



Taking care of business, our planet and our communities.

At Office Depot[®], we believe in sustainable development as we grow and evolve our organization. This means that we strive to take care of our customers and stakeholders while also taking care of our shared environment and community.

While we measure our organization's success through sales and profit, we also capture other metrics that define our industry leadership in areas such as environmental sustainability, diversity and philanthropy.

We are committed to decreasing the company's environmental impact through waste diversion programs, greener packaging, transportation innovations and product solutions that extend through the lifecycle. In 2016, we decreased our direct Greenhouse Gas Emissions (GHG) by 8 percent, and we expect to realize further decreases with ongoing energy and transportation efficiency practices. Our waste management efforts resulted in more than 50 percent of our waste being diverted from the landfill.

We also continue to support diversity and entrepreneurism in our business community by partnering with over 300 diverse suppliers, including minority-, women-, veteran-, disabled-, and LGBT-owned businesses. In this report, you'll learn more about how we uncover and develop these important relationships in our communities across the U.S.A.

Additionally, the Office Depot Foundation provided support and assistance to underserved members of our community. In 2016, they continued the legacy of their 'National Backpack Program', donating 200,000 backpacks to children in need, resulting in over 4 million backpacks donated since 2001. This is only one of their inspiring programs that make a difference across our nation and globe, year after year.

While our environmental and social sustainability efforts increase each year, we are also noticing a growing trend in our sales of greener products. Last year, sales of greener products accounted for 30 percent of our total product assortment. Therefore, we feel strongly that sustainability is a business strategy that builds upon our financial foundation while supporting our environmental commitment and serving our community.

Sincerely,





THREE PILLARS OF SUSTAINABILITY				
SUSTAINABILITY MATRIX	7			
ECONOMIC SUSTAINABILITY				
Office Depot® at a Glance	9			
ENVIRONMENTAL SUSTAINABILITY				
Sustainability Awards	11			
Greener Products & Services	12			
Defining Shades of Green	13			
Recycling & Waste	14			
Greenhouse Gas Footprint	15			
The Office Depot® GreenerOffice™ Delivery Service	16			
Tree-Up Program	17			

SOCIAL SUSTAINABILITY

Supplier Guiding Principles	26
Ethics & Compliance	28
Philanthropy	30
National Backpack Program	31
Educational Forum	31
Disaster Recovery	32
Office Depot Foundation Women's Symposium	33
SUSTAINABILITY DASHBOARD	35

ABOUT THIS REPORT

This report covers the Office Depot, Inc. U.S.A. sustainability activities in the calendar year 2016, unless otherwise indicated. For questions and comments regarding this report, please contact corporatesustainability@officedepot.com

THREE PILLARS OF SUSTAINABILITY

Office Depot's sustainability platform, which includes the Office Depot® GreenerOffice™ program, has been in place since 2004. The platform is built on the triple-bottom-line approach to sustainability which includes the three pillars of economic, environmental and social initiatives.

To include triple-bottom-line factors in the scope of our report, we developed a Corporate Sustainability Matrix which serves as the basis for our data reporting. We strive for transparency in our sharing of metrics for our customers, our suppliers and ourselves, and this matrix is the basis for the organization's sustainability scope and reporting.



ECONOMIC SUSTAINABILITY	Sales	Spend		Gross Profit	
ENVIRONMENTAL SUSTAINABILITY	Eco-Conscious Sales	Eco-Conscious Spend		Waste From Operations	
	Recycled Products From Customers	Carbon Footprint From Transportation		Carbon Footprint From Facilities	
COCIAL SUSTAINIA DILITY	Socially Conscious Sa	ales	Socially Conscious Spend		
SOCIAL SUSTAINABILITY	Global Supplier Compl	iance	Philanthropy		

Greener Products & Services Waste & Recycling Packaging **Human Rights Product Quality Greenhouse Gas Footprint Transportation Efficiency** IMPORTANCE TO STAKEHOLDERS Health & Safety **Communication & Reporting Customer Partnerships Supplier Diversity** Water Consumption **MATERIALITY ANALYSIS** Philanthropy Office Depot® leveraged this analysis to help us identify, evaluate and prioritize the issues of greatest importance to customers **Workplace Diversity** and our stakeholders. Using that feedback we created a framework that focuses on all material aspects of sustainability. **Associate Development Opportunities & Training** Grand & Toy's Materiality Assessment done in 2014 revealed that stakeholders have a strong preference for our company to prioritize Corruption providing high quality greener products and services that are optimally **Biodiversity** packaged and delivered on efficient vehicles. In evaluating the feedback from this analysis, we believe these issues continue to be of high importance for us to address.

ORGANIZATIONAL IMPORTANCE

TAKING CARE OF BUSINESS

ABOUT OFFICE DEPOT, INC.

Office Depot, Inc. is a leading provider of products, services and solutions for every workplace – whether your workplace is an office, home, school or car.

The company had 2016 annual sales of approximately \$11 billion, employed approximately 38,000 associates, and served consumers and businesses in North America and abroad with approximately 1,400 retail stores, award-winning e-commerce sites and a dedicated business-to-business sales organization – with a global network of wholly owned operations, franchisees, licensees and alliance partners. The company operates under several banner brands including Office Depot, OfficeMax and Grand & Toy. The company's portfolio of exclusive product brands includes TUL®, Foray®, Brenton Studio®, Ativa®, WorkPro®, Realspace® and Highmark™.

2016 SALES BY DIVISION



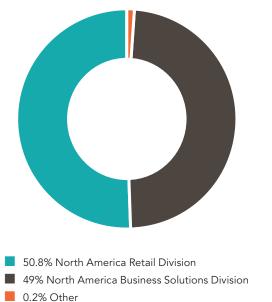
\$11 BILLION
2016 Global Sales



38,000 Worldwide Associates



1,400 Retail Stores



Of fice Depot, Inc.'s common stock is listed on the NASDAQ Global Select Market under the symbol "ODP." and the symbol of the

Office Depot, Ativa, FORAY and Realspace are trademarks of The Office Club, Inc. OfficeMax , Brenton Studio, Divoga, Highmark, TUL, and WorkPro are trademarks of OMX, Inc. Grand & Toy is a trademark of Grand & Toy Limited. ©2017 Office Depot, Inc. All rights reserved.

EXCLUSIVE BRANDS

TÜL

FORAY.

HIGHMARK

ATIVA®



divoga







OFFICE DEPOT® SUSTAINABILITY AWARDS



2016 EASTMAN CHEMICAL COMPANY SUSTAINABILITY AWARD AND SPECIAL RECOGNITION AWARD FOR EXCELLENCE

OFFICE DEPOT® GREENER PURCHASING AWARDS TO CUSTOMERS

One of the unique ways we sell greener is by celebrating our customers who buy greener. In 2016, we awarded Leadership in Greener Purchasing Awards for high overall green spend vs. peers up to 30 of our customers, including:

American Electric Power	Ogletree, Deakins, Nash, Smoak & Stewart
Best Buy Co., Inc.	Oracle
Chicago Public Schools	Rush Enterprises, Inc.
City of Chicago	State of Washington, Dept. of Licensing
DaVita	University of California
Los Angeles City College	University of Notre Dame
Marsh & McLennan	University of Pennsylvania

OFFICE DEPOT® PARTNERSHIPS











GREENER PRODUCTS AND SERVICES

We use a wide range of approaches to increase customer uptake of greener products. We offer The Green Book® digital catalog to simplify the green shopping experience for our contract customers, maintain a GreenerOffice™ web store with 14,000 products with environmental attributes, and run regular promotions on greener products. We also have one of the industry's leading sets of Green Solutions and reporting tools, many of which were developed in collaboration with specific customers.

A key success metric of our environmental program is "greener sales." This single number captures how we are sourcing greener products, how well we are attracting customers who demand greener products and how well we are marketing these products to create demand. In 2016, we had \$3.2 billion in greener sales, which is 30 percent of our overall sales.

Office Depot has a strong focus on selling greener paper as it is one of our most material environmental impacts. In 2016, 27 percent of Office Depot paper sales were environmentally conscious in some way.

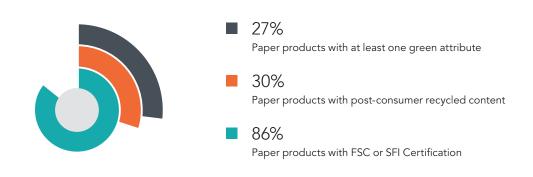
TOTAL SALES



TOTAL ACTIVE ASSORTMENT



TOTAL ACTIVE** PAPER ASSORTMENT



SHADES OF GREEN

The lack of formal standards on what constitutes a green product continues to be the reason for Office Depot's environmental team to evaluate questions, including: "What makes a product green?" "Which certifications are 'good enough'?" and "Is one certification process preferable to another?" These questions (and more) needed to be discussed to formulate a consistent approach and strategy for buying greener for internal purchasing as well as resale. Therefore, we designed the Office Depot® GreenerOffice™ Rating System.

When developing this system, we started by researching the attributes and eco-labels referenced in Environmentally Preferable Purchasing (EPP) policies from several major stakeholders, e.g., EPA (Environmental Protection Agency), GSA (General Services Administration), US Green Building Council (USGBC), State of Washington, State of Florida, etc., as well as Responsible Purchasing Guides created by the Responsible

Purchasing Network. Our research revealed that different customers have widely different definitions of green and their thresholds for 'how green is green enough' also varied substantially.

Our goal in defining 'shades of green' was to create a relatively simple method to allow all customers to compare similar products and make choices that could be considered greener for one or more reasons. We sought input and feedback from a number of stakeholders, and made adjustments based on their input. The ratings help us select products for our Green Books and form the basis of our Green Business Review, a report that documents a customer's purchases.

Visit our Greener Purchasing Program guide to learn more about Shades of Green at business.officedepot.com/gpp

PERCENT OF GREEN SALES

Broken down by Shades of Green

% 34% 5%



LIGHT GREEN
For products with
at least one meaningful
green attribute/eco-label



MID GREEN
For products with a
high level of meaningful
green attributes/eco-labels



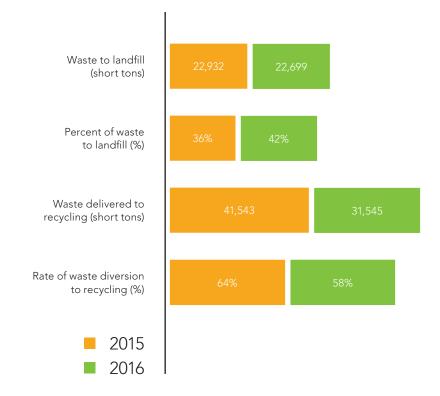
DARK GREEN
For products with the
highest level of meaningful
green attributes/eco-labels

RECYCLING AND WASTE

Reducing the amount of waste we send to landfills continues to be an effort of focus. In 2016, we partnered with our waste service provider, Republic Services, to assist in streamlining and optimizing our operations around waste management.

One of our goals was to streamline our cardboard recycling at stores by eliminating local cardboard pick-ups and using more efficient backhauling of baled cardboard to distribution centers. We implemented office paper recycling best practices by incorporating office paper with the baled cardboard, and conducted a waste services evaluation to eliminate unnecessary pickups across the country. By conducting waste audits at supply chain locations, we were able to gain visibility of waste streams and make recommendations for increased diversion of recoverable cardboard. Going forward, we will continue to look for ways to increase our diversion rate.

Office Depot has a strong offering of take-back programs for closed loop recycling – most notably through Office Depot's ink & toner and technology recycling programs. In 2016, we took back close to 6,900,000 lbs of these products for recycling, including 17 million ink and toner cartridges.



RECYCLING SOLUTIONS FOR CUSTOMERS





17,093,800 Number of ink and toner cartridges



2,910,775
Technology
weight (lbs)

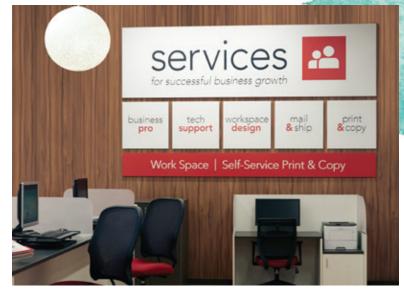


9,015,200 Paper from shredding services (lbs)



2,150 Batteries (lbs)







GREENHOUSE GAS FOOTPRINT

Our facilities' carbon footprint at Office Depot® is driven by three main sources: our stores, distribution centers and headquarters.

We continuously look to our facilities for ways in which they can run and operate more efficiently and reduce our environmental impact. To reduce our energy consumption, we have replaced our old HVAC units with more efficient ones, and installed motion sensors in offices and restrooms and lighting and electrical on EMS circuits. In addition to using more energy-efficient LED lighting, we're also keeping lights on timers with a programmable schedule. Additionally, all exterior signs are also on timers tied into the EMS system, for more energy efficiency. To reduce our water footprint, we have installed low-flow toilets and other water-saving plumbing fixtures.

Another factor that constitutes to the overall improvement in our Facilities footprint is due to the business activities and streamlining operations over the past year.

2015	2016	Improvement
_	153.26	_
2,841,858	2,590,449	10%
640,884	588,910	9%
11.4	11.2	2%
63,500	60,500	5%
334,000	306,100	9%
8,500	8,400	1%
389,000	358,200	9%
	- 2,841,858 640,884 11.4 63,500 334,000 8,500	- 153.26 2,841,858 2,590,449 640,884 588,910 11.4 11.2 63,500 60,500 334,000 306,100 8,500 8,400

THE OFFICE DEPOT® GREENEROFFICE™ DELIVERY SERVICE

Through the Office Depot® GreenerOffice™ Delivery Service, a large number of our orders are delivered in paper bags instead of cardboard boxes because significantly less wood is used to produce paper bags than corrugated boxes. The bags also contain 40 percent postconsumer recycled content, while the reusable plastic totes that protect the bags during transportation contain 60 percent postconsumer recycled plastic. This program continues to help decrease the overall use of packing materials needed for Office Depot deliveries, resulting in cost savings and waste footprint reduction. It also responds to our customers' interest in saving resources and reducing their waste.

The following chart shows the overall waste avoidance impact of switching from boxes to paper bags for all of our eligible customers in 2016.

GREENEROFFICE™ DELIVERY LIFECYCLE IMPACT ANALYSIS

	Environmental Impact	Est. Equivalence*	
Wood Use	4,013,967 lbs	1,797 trees**	
Net Energy	24,044 mil BTUs	264 homes energy avg/yr	
Greenhouse Gases	4,355,766 lbs CO ₂	396 avg cars/yr	
Wastewater	115,625,519 gal	24 Olympic-size swimming pools	
Solid Waste	1,441,188 lbs	51 garbage trucks	

^{*}Scenario assumes a single bag to box replacement. The assumed average box weight is based on the weighted average of all boxes forcasted to be transitioned to bags.



TREE-UP PROGRAM

Office Depot® and the Arbor Day Foundation are collaborating on a new program called "TreeUp" which utilizes a paper calculator tool to determine the amount of wood used and carbon emitted, based on a company's paper purchases. The Arbor Day Foundation offset the 2016 paper purchases from our headquarters in Boca Raton, FL by planting 855 trees and offsetting 214 metric tons of carbon on behalf of Office Depot. Learn more about the associated environmental benefits in the project descriptions below.

Reforestation Project

Milford Neck, Bombay & Prime Hook National Wildlife Refuge

This Delaware project focuses on replanting land that was clear-cut for agricultural purposes as well as forests that were lost to salt water intrusion after Hurricane Sandy. It reestablishes forest cover in and around watershed areas to improve water quality and restores critical habitat for migratory birds and area wildlife.

Carbon Project

Mississippi River Valley

This area is one of the most critical wetland resources in North America. Carbon credits help restore forest lands that have been used for a variety of non-forest purposes such as agriculture and mining, for decades. In addition to carbon sequestration, these trees provide benefits such as improved water quality, soil stabilization and wildlife habitat.



^{**}The number of typical trees assumes a mix of hardwoods and softwoods 6"-8" in diameter and 40' tall.

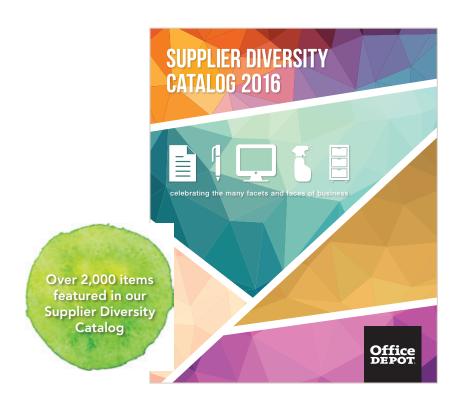


DIVERSITY MISSION STATEMENT & COMMITMENT

At Office Depot®, we believe that one critical component to social sustainability is a commitment to diversity: from the partners and suppliers we align with, to the products and services we offer, to the culture we create for our associates, we believe that diversity makes us stronger, more competitive, and more creative in delivering valuable solutions to our customers.

We are committed to creating an inclusive environment where all people are valued and respected. Diversity is an important dimension of Inclusion, Innovation and Customer Focus – three of our core values and keys to our success in a global marketplace.

As part of a strong commitment to social sustainability, Office Depot supports and promotes diversity in multiple ways: from partnering with diverse suppliers, to ensuring our customers have access to a diversely sourced assortment, to offering diverse partnerships, and to fostering a culture within our associates that supports and values differences.



2016 AWARDS

WOMEN'S BUSINESS ENTERPRISE NATIONAL (WBENC)

One of America's Top Corporations for Women's Business Enterprises

WE (WOMEN'S ENTERPRISE) USA MAGAZINE

100 Corporations of the Year

MBN (MINORITY BUSINESS NEWS) USA MAGAZINE

Corporate 101 – America's Most Admired Corporations for Supplier Diversity

2016 Champions of Supplier
Diversity

DIVERSITY SPONSORSHIP

Student Entrepreneur Program

The Women's Business Enterprise National Council (WBENC) Student Entrepreneur Program (SEP) fosters growth for the next generation of women-owned businesses. The program consists of aspiring collegiate female entrepreneurs studying in STEAM (Science, Technology, Engineering, Arts, and Math) or Business. The students receive mentoring from successful Women's Business Enterprises in Fortune 500 companies while participating in a tailored entrepreneurial curriculum, a pitch competition awarding \$20,000 in seed capital, and experiential learning through off-site visits to Women's Business Enterprises, corporate campuses, and accelerators. Since 2008, more than 150 students from 50 colleges and universities have graduated from SEP program.

In 2016, Office Depot sponsored two students to attend the WBENC SEP program in Orlando, Florida. Mona Amin, WBENC's 2nd place SEP Pitch Competition Winner from Eastern Carolina University and Co-Founder of Freshspire Incorporated, stated, "WBENC SEP gave me a new sense of pride in the words 'female entrepreneur'. I would highly recommend this program to any woman interested in pursuing entrepreneurship."

Tuck WBENC Strategic Growth Program

Tuck Executive Education at Dartmouth College and IBM partnered to provide an exceptional Strategic Growth Program (SPG) for Women Business Enterprises (WBEs). The SPG program consists of a six-day intensive experience focused on WBE skill development to increase business capacity, operations, and leadership. Participants examine their businesses as case studies throughout the week and apply core business concepts through real-world applications.

In 2016, Office Depot sponsored President Marty Harris of Sep Communications, LLC to attend the Tuck Executive Program. Marty states, "The professors are top notch, both in their knowledge and passion. They teach you how to view your business more strategically. Many thanks to Office Depot, WBENC, Tuck, and IBM for an amazing opportunity!"

DIVERSITY VENDOR BREAKOUT

131

Minority Owned Business Enterprise

191

Woman Owned Business Enterprise

6

Veteran Owned Business Enterprise

8

Service Disabled Veteran Owned Enterprise

58

Small Disadvantaged Owned Business Enterprise

14

Disability Owned Business Enterprise

219

Small Business

69

NMSDC - National Certified

107

WBENC - National Certified

207

Central Contractor Registration (CCR) Listed

ASSOCIATE DIVERSITY

Office Depot® is committed to an inclusive work environment that values and respects the talents and contributions of every associate. We create a diverse and inclusive workplace culture when we attract and hire associates of all abilities and backgrounds.

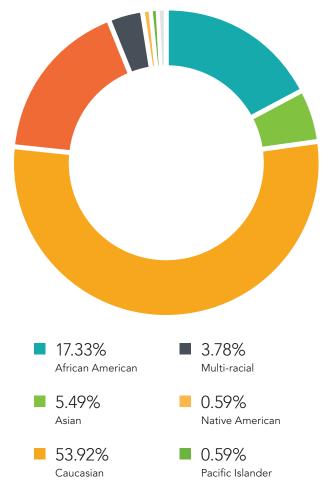
Our commitment to equal opportunity is driven by Office Depot's values, which include teamwork and respect. Diversity is intrinsic to our values and contributes to our success in the markets we serve. In addition to our company values, we also live by the following diversity values:

- We employ a diverse workforce that reflects the communities in which we do business.
- We offer equal opportunities for advancement and encourage all employees to develop to their full potential.
- We appreciate the importance of a diverse workforce at the highest levels of management.
- We embrace new ideas and perspectives and respect individual differences.
- We do not tolerate harassment of any kind.

To help achieve our inclusion and diversity goals, we engage a broad range of community stakeholders and reach entire communities through our corporate citizenship efforts.

In 2016, our outreach and diversity involvement activity earned us a perfect score in the Human Rights Campaign Foundation's Corporate Equality Index for the sixth consecutive year.







17.22%

Hispanic

40.96% Female



1.07%

Not Specified

59.04% _{Male}



ASSOCIATES WITH DISABILITIES ARE GIVEN THE TOOLS TO SUCCEED

Diversity and inclusion are more than just buzzwords or boxes to check. They are important values that have always been rooted in Office Depot's culture. Through the company's Launch Ability Academy Training program, in partnership with Grand Prairie Independent School District and the Texas Department of Assistive and Rehabilitative Services, individuals with disabilities are trained to work in various positions in the Grand Prairie Distribution Center. Students gain hands-on experience in the packing and induction departments of the warehouse, and spend time in the training room learning about Office Depot's core values, policies and procedures.

Office Depot warehouse associates work with the students on daily job functions, being a team player, and working well with others. In conjunction with the Texas Workforce Commission, the company also provides sensitivity training to supervisors of these associates to ensure they are fully equipped to deal with any challenges that may arise.

At the end of each program, a graduation ceremony is hosted in the students' honor. Parents, school administrators and fellow associates are invited to attend the celebration.

WOMEN'S LEADERSHIP CIRCLE

Office Depot has a history of supporting and developing women leaders and is increasing this commitment through its newly established Women's Leadership Circle. Comprised of women from Sr. Manager to Sr. Director level, the program provides skill-building and networking opportunities through workshops and panel discussions hosted by seasoned women leaders and entrepreneurs.

The ultimate goal of the Women's Leadership Circle is to see more women in leadership roles. By applying the best practices that they learn as part of the group, the participants can drive their teams, and ultimately, their own success.

The opportunity to meet with other women leaders across the company and within the different career stages allows these women to leverage one another's experiences and insight.

HELPING VETERANS

Office Depot is proud to support many ongoing programs that recognize veterans. Office Depot is a member of the Veteran Jobs Mission, a coalition of companies committed to hiring 100,000 veterans by 2020. The company also launched a partnership with Veterans Advantage, a military benefits program, to provide veterans and their families with an exclusive 20 percent discount on select purchases in our retail stores and at officedepot.com.



LGBT

Office Depot is proud to be a champion of diversity. Our focus on creating a diverse work environment includes our lesbian, gay, bisexual, and transgender (LGBT) associates.

This commitment is evidenced by our designation from the Human Rights Campaign as one of the "Best Places to Work for LGBT Equality" and earning a perfect 100 percent score in the organization's Corporate Equality Index each year since 2012. Such recognition reflects our ongoing efforts to ensure that our associates are not discriminated against due to sexual orientation or gender identity and that our benefits offerings are inclusive, as well as our continued public demonstration of support for the LGBT community.

As an extension of these efforts, the company hosts an LGBT affinity group. The purpose of the group is to bring LGBT associates and allies together to foster a welcoming and inclusive work environment, facilitate associate engagement, and develop and promote diversity within Office Depot and externally. Activities include social events and community service projects to provide opportunities to network, give back and learn from peers.

PRIVATE BRAND & CORPORATE SOCIAL RESPONSIBILITY

Office Depot continues to work extensively with an independent, accredited third-party audit partner to conduct onsite supplier audits to ensure that our sourcing factories for our branded products are operating in accordance with our Supplier Guiding Principles and the local laws/regulations in that country.

Our Social Responsibility team continues to actively review and approve corrective action plans and, based on an internal grading system, re-audit requirements are defined and conducted by an independent third-party audit provider. Office Depot takes a zero tolerance stance on certain breaches of our policies in which noncompliance by the supplier may result in termination of the relationship. We also ensure that factories receiving consecutive "needs improvement" grades are monitored for corrective action through our continuous improvement process.

Office Depot continues to proactively train our vendors and factories on local laws, regulations and quality-of-life issues for their employees. Empowering our partners to do the right thing and be socially accountable is a cornerstone of Office Depot's Corporate Social Responsibility Program.

The program will continue to expand in those regions where we are sourcing Office Depot products currently or plan to in the future.

Social responsibility is unique in its potentially profound impact on the quality of life for workers around the world.

— Sandy Stainton, Sr. Manager, Social Responsibility







CALIFORNIA TRANSPARENCY IN SUPPLY CHAINS ACT DISCLOSURE

The California Transparency in Supply Chains Act took effect in the State of California on January 1, 2012. The purpose of the Act is to eliminate slavery and human trafficking in product supply chains, and to provide transparency to consumers so they may make more educated purchasing decisions.

Office Depot continues to fully support this Act, which requires companies to disclose their efforts to ensure that their supply chains are free of slavery and human trafficking. We continuously seek ways to enhance our processes to ensure that high standards of safety, quality and human rights are upheld throughout our supply chain. Since the implementation of the Office Depot social and vendor compliance program in 2003, we have made value-based management the framework around which our global business strategy is constructed. We have committed to uphold the highest ethical, social and environmental standards in the conduct of our business and the operation of our supply chain. Fulfilling this commitment requires a comprehensive set of policies and programs integrated throughout our business operations.

We ensure our compliance with the California Transparency in Supply Chains Act by communicating our Supplier Guiding Principles and working to ensure these Principles are upheld by our business partners who manufacture, assemble and distribute our products. We require verification and certification as a condition of vendor purchasing agreements or purchase order items from each of our direct suppliers. These agreements require that these suppliers comply with applicable laws and regulations, including prohibitions on forced or child labor, slavery and human trafficking.

Suppliers and their factories producing Office Depot's private label and direct import products are selected for a vendor compliance audit. These audits are performed or evaluated by an independent third party to verify compliance with our requirements.

More information can be viewed on our public website: officedepot.com/transparency

Office DEPOT OfficeMax **Supplier Guiding Principles** Office Depot Values and Commitmen The values of Office Depot, Inc. and its subsidiaries, affiliates, franchisees, joint venture partners, divisions and agents ("Office Depot") are founded on the principles of accountability and integrity. Office Depot expects organizations producing goods and previding services for it, including any approved subcontractions (collectively "Aggolders"). To follow and adhere to these Supplier Guiding Principles and the services of the Supplier Guiding Principles and the services of the Supplier Guiding Principles and propriet of the Supplier Guiding Principles and services only from Suppliers who strive to comply fully with all applicable laws and regulations, and those who meet internationally recognized standards and practices in dealing with its workers and their working All Suppliers of Office Depot must comply with all applicable laws and each of the following principles: L. Labor Standards and Human Rights <u>Prohibition of Forced Labor, Hernan Trafficking and Stevery</u> Supplier may not use any form of forced labor including prison, inderstand, bonded, military, slave or any other forms of forced labor; suggest <u>Bast</u>. In the event Supplier desires to participate in a program that provides shabilisation or such programs for incarcerated individuals to supply goods or services to Office Depot, all elements of any such programs must be submitted to Cifcio Depot and Service and velocities and programs of the Depot Cifcio Depot and Service and Service and Service Depot Cifcio Dep not require any of its workers to remain in employment against their will. Prohibition of Child Labor Supplier may not use child labor. Workers should not be younger than the minimum employment age established bupport may not use creat about, violants snoble not one younger it has not minimum employment agit established, workers by the estapetities country or boall jurisdiction. In the event no minimum employment gas a residebled, workers should not be younger than the age of computercy education; or if no minimum age for computercy education is established, workers should not be younger than age 16.

SUPPLIER GUIDING PRINCIPLES

Office Depot® expects the suppliers who produce goods and services for our Company to adhere to our Supplier Guiding Principles. The Supplier Guiding Principles are essentially our supplier code of conduct and represent Office Depot's commitment to source goods and services from suppliers that strive to fully comply with all applicable laws and regulations.

Office Depot seeks to partner with suppliers who meet internationally recognized standards in dealings with their workers, the environment in which products are made, and their supply chain operations. Office Depot requires our suppliers to uphold the Office Depot Guiding Principles as a requirement for doing business with our Company.

SUPPLIER COMPLIANCE METRICS

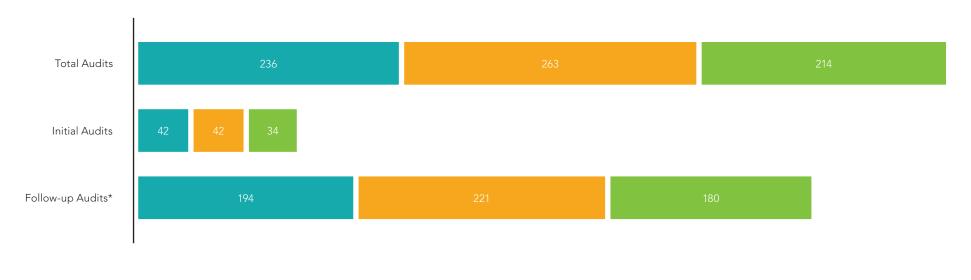
In collaboration with our suppliers, we have enhanced our supply chain business model in order to address potential issues. This process includes ongoing training, education visits, and assessments. The continuous improvement program mandates factories receiving three consecutive "Needs Improvement" results must attend in-house training. The enhanced program has provided an opportunity to customize the training to the factory to address the root cause for reported findings and to implement sustainable solutions for those factories that qualified for the program.

By the end of 2016, 87 factories completed the mandated training.

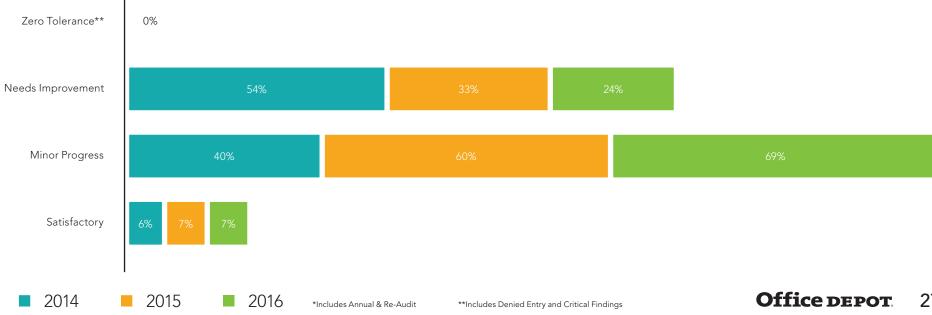
Monitoring the long-term effectiveness of the program, 78 percent of active factories audited after exiting the program sustained improvement.

The program has been implemented globally and is built on a foundation of integrity. The program continues to drive improvement through process, collaboration, training and transparent data reporting.

U.S.A. FACTORY INSPECTIONS (2014 – 2016)



GRADE (2014 – 2016)



2014 2015 2016 *Includes Annual & Re-Audit **Includes Denied Entry and Critical Findings Office DEPOT. 27

ETHICS & COMPLIANCE

The foundation of Office Depot's culture is based on our core values.

These values guide our decision-making and how we behave as a company. At Office Depot, we strive to conduct ourselves and our business with uncompromising honesty and integrity. We make this commitment on a global scale to our customers, business partners, associates and shareholders because it is the right thing to do. We are committed to the highest standards of ethics and transparency in our operations. We believe organizations that remain loyal to their beliefs and have mechanisms in place to fulfill these goals build a foundation for long-term, sustainable success.

The Global Compliance Department strives to create awareness of and maintain compliance with Office Depot's ethical business practices and compliance policies by educating and training our associates. Office Depot's 2016 compliance training program consisted of a broad curriculum of compliance training courses to educate our employees on new and existing Company policies, laws and regulations.

We reinforced our commitment to behaving ethically through live instructor-led and computer-based training for our employees around the globe. Our Ethics and Compliance Program was strengthened through live instructor-led Anti-Corruption and Anti-Bribery Policy training for associates in the various regions in which we operate. In addition, Office Depot conducted numerous other trainings on topics such as Anti-Harassment, Privacy, Conflict of Interest, Human Trafficking, and Insider Trading to further exemplify our commitment to our compliance policies and educate our associates on the policies, laws, and regulations that are applicable to our business.

Office Depot's commitment to growing our business means ensuring that our growth strategies align with our commitment to ethical behavior and compliant business practices. As such, we regularly evaluate our internal compliance programs against industry standards, and validate their effectiveness by engaging outside legal, audit and ethics compliance partners in this evaluation.

OUR CORE VALUES

INTEGRITY

We say what we do and do what we say.
We always tell the whole truth and deliver
on our commitments.

ACCOUNTABILITY

We take responsibility for our actions and the actions of our teams.

We accept responsibility for delivering results.

INNOVATION

We embrace the need for continuous improvement and never get too comfortable with the status quo.

TEAMWORK

We subordinate our personal needs and agendas for the greater benefit of our team.

RESPECT

We treat others the way we want to be treated.

If you SEE something, SAY something...



Call the OD Hotline 866-OD-HOTLINE 866-634-6854



Visit ODHotline.com



Speak to your **manager** or contact your **HR or LP Representative**

If you witness unethical behavior in the workplace, tell your manager or report it to the Office Depot® Hotline through one of the ways shown above.

Unethical behavior includes

■ Theft or fraudulent activity ■ Workplace misconduct ■ Violations of company policy or the law

Associates may choose to remain anonymous during the reporting process. Office Depot[®] does not tolerate any retaliatory action against anyone who has acted in good faith in reporting possible violations of law, the Code of Ethical Behavior, or Company quidelines

Office DEPOT OfficeMax

OFFICE DEPOT® HOTLINE

Office Depot is committed to fostering an environment where open communication regarding the Company's ethics and compliance program is encouraged. Associates are encouraged to ask questions and report concerns to their manager, their manager's manager, the Global Compliance Department, the Legal Department, Human Resources, or directly to our Chief Compliance Officer. The Company also has an effective hotline that may be accessed via phone or web from around the world, allowing confidential and anonymous reporting.

Office Depot seeks to create a positive, ethical and safe work environment through its global hotline. The hotline is our global ethics and compliance communications forum for associates and others to voice their concerns or report violations pertaining to our Code of Ethical Behavior, the law or other Company policies. Our Global Compliance Department administers the hotline to ensure that concerns are reported in accordance with our policies and procedures, assigned to the correct investigation team, and thoroughly investigated and addressed.

The Office Depot Hotline is operated by an independent third party and available 24 hours a day, seven days a week through multiple avenues in various languages. We encourage all associates to do the right thing and report fraud, misconduct, theft or other unethical behavior through the various avenues, including the Office Depot Hotline. Such reports help us address issues in the workplace and allow the company to act to resolve actions or behaviors that could potentially harm others or the company.

PHILANTHROPY

The Office Depot® Foundation has evolved from a disaster-relief Foundation to an organization guided by the principles of Listen Learn Care. Its vision is to empower people to make a difference in the classroom, conference room, and community. It seeks to carry out its mission through the guiding principles known as "The Caring Agenda." These include:

- Equipping children with tools to succeed in school and in life;
- Engaging individuals who desire to make a difference in the world through donations, volunteerism, and information sharing;
- Enhancing the capabilities of nonprofit organizations by providing the expertise, resources, and collaboration they need to increase their capacity while becoming more efficient and effective;
- Partnering with businesses of all sizes to develop and implement philanthropic programs that engage their employees and deliver measurable results; and
- Helping communities prepare for disasters, and recover and rebuild afterwards.

The Foundation is an independent foundation, tax exempt under IRC Sec. 501(c)(3), and is governed by an independent by a board of directors that is composed of Office Depot associates as well as individuals from outside the company. Every day, the Foundation strives to make a difference for children, families and communities around the world.





NATIONAL BACKPACK PROGRAM

16th anniversary

The beginning of a new school year is full of excitement and hope. But for families who can't afford to provide the bare necessities to their children, it's often a time for stress and concern.

The Office Depot Foundation National Backpack Program seeks to help these deserving kids by donating sturdy and colorful sackpacks containing essential school supplies across the country. In 2016, some 200,000 sackpacks were given away – enough to cover five football fields! Time and again, sackpack recipients tell us what an important difference it makes for their children to receive these much-needed supplies.



"It is an amazing program. It is such a big help to so many kids in the community. The smiles on the faces of the children and their parents are a heartfelt blessing."

— Bernadine Malone, Youth Director, Morning Star Baptist Church, New Orleans

EDUCATIONAL FORUM ENGAGES NONPROFITS

Every year, representatives of a wide range of nonprofit organizations throughout South Florida and beyond gather for a full day of education and inspiration at Office Depot. Known for the past nine years as Weekend in Boca, this event will be renamed the Difference Maker Leadership Forum when it convenes again in 2018. The program brings together distinguished speakers as well as participants from across the United States. The theme of the 2016 event, which took place on November 11 at Office Depot headquarters, was "Building Community: Strategies for Making a Difference."



"Office Depot's Weekend in Boca seminar is one of the most interesting and valuable seminars I have attended within the nonprofit world."

— Jon Sahn, Ascendant Planned Giving



HELPING COMMUNITIES RECOVER IN TIMES OF DISASTER

Flint Water Crisis

The Office Depot Foundation donated \$10,000 to the international relief organization, Feed the Children, to sponsor the delivery of four truckloads of bottled water for use by the residents of Flint, Michigan during their water crisis. The water was distributed by local volunteers in collaboration with the Michigan State Police Department and other official efforts to assist the residents. One truckload of water was donated to the Genesee County Humane Society to help residents with pets who had been affected by the tainted water.

Pulse Orlando

Following the tragic events that occurred at the Pulse Night Club in Orlando, the Office Depot Foundation donated to Lutheran Church Charities Comfort Dogs, the Zebra Coalition, the Trevor Project, and to the Center Orlando. "We Stand with Orlando" wristbands were created in rainbow colors to remember the Orlando victims and were distributed to all Office Depot associates. The Foundation also sponsored PARK Fest – a 5K run and festival in Miami, and dedicated its participation in the event to the Orlando victims.

Louisiana Flooding

The Office Depot Foundation worked with the international relief organization Feed the Children to sponsor the delivery of three truckloads of supplies for distribution in the communities affected by the 2016 flooding in southeastern Louisiana. Two truckloads of relief supplies, personal hygiene items and food were delivered in Baton Rouge. A third truckload of relief supplies was delivered for other community residents. Together, the items sent to Louisiana with the Office Depot Foundation's support were valued at approximately \$150,000. In addition to the Feed the Children partnership, the Foundation also made a \$5,000 donation to the Humane Society to assist with relief and recovery efforts for pets and their families.



OFFICE DEPOT FOUNDATION WOMEN'S SYMPOSIUM

The Office Depot Foundation's annual Women's Symposium offers a full schedule of speakers who come together to inspire, encourage and energize attendees with their dynamic presentations. Just as in previous years, the 2016 Women's Symposium speakers took the event to a whole new level of inspiration, motivation and education - with extraordinary networking opportunities that make it an exceptional experience.

The symposium brings together hundreds of like-minded, thoughtful, strong and driven women in an engaging, collaborative and personally transformative atmosphere.

"I couldn't stop talking about my experiences at this conference. I am so motivated to make a change and a difference in my life."

– Susan Minix, Owner, Wet Kisses Pet Company



SUSTAINABILITY DASHBOARD

Goal	Corporate Sustainability Metric	Total	Proposed Sub-Metric	Sub-Metric Data	GRI Indicators
Economic Sustainability	Global Office Depot [®] Sales (in millions) ¹	\$11,021	Net Sales (all products & services)	\$11,021	G4-9
	Global Office Depot Spend (in millions)	\$8,313	COGS (all products & services)	\$8,313	
	Global Office Depot Gross Profit (in millions)	\$2,708	Gross Profit (all products & services)	\$2,708	
		29%	Sales of Products Containing Recycled Content ³	16%	G4-EN27
	Eco-Conscious Sales ²		Sales of Products With Other Meaningful Eco-Attributes⁴	13%	
			Sales of Products With Third-Party Eco-Labels⁵	14%	
	Eco-Conscious Spend ⁶	30.49%	COGS on Eco-Conscious Products & Services	30.49%	
	Waste from Operations ^{7 11}	56,750mt	Waste Footprint	20600mt	G4-EN23
			Recycling From Operations	36150mt	
	Weight of Products Recycled From Customers ¹¹	8,381mt	Tech	1,320mt	G4-EN28
Environmental Sustainability			Paper (shredding)	4,090mt	
			Ink/Toner Weight	2,970mt	
			Batteries/Cellphones	1mt	
	Carbon Footprint From Transportation ¹¹	91,100mt C02e	Carbon Footprint From Private Fleet	13000mt C02e	G4-EN15 G4-EN30
			Carbon Footprint From Third Party Carriers	32800mt C02e	
			Carbon Footprint From Long Haul Transportation	33450mt C02e	
			Carbon Footprint From Shipping	2850mt C02e	
			Carbon Footprint From Other Transportation	9000mt C02e	

Continued on next page Office DEPOT: 35

Goal	Corporate Sustainability Metric	Total	Proposed Sub-Metric	Sub-Metric Data	GRI Indicators
Environmental Sustainability	Carbon Footprint From Facilities ⁸⁹¹¹	345,015mt C02e	Electricity ¹⁰	584,500,000kWh	G4-EN3 G4-EN16
			Natural Gas/Propane Fuel ¹⁰	445,400mmbtu	G4-EN3 G4-EN15
			Renewable Energy Credits Purchased	8400 mtC02e	
	Socially Conscious Sales	F 240/	Diverse Supplier Sales (%)	5.32%	
		5.34%	Sales of Fair Trade Products	0.02%	
		\$1,723,540	Cash Donations	\$799,706	
	Philanthropy		Number of Backpacks Donated	283,799	G4-EC1
Social			Value of In-Kind Donations	\$923,834	
Sustainability	Supplier Diversity	331	Number of Diverse Suppliers Supported	331	
	Global Supplier Compliance*	7%	Number of Factories Manufacturing Private Brand Products	215	G4-HR9
			Number of Audits Completed	221	
			Number of Factories With Satisfactory Audit Results	15	O4-UKA
			Percent of Factories With Satisfactory Audit Results	7%	

- 1 Global Office Depot information was used for this metric. All other data in the dashboard is specific to US.
- 2 Office Depot US: products with at least \$1,000 sales.
- 3 Includes products with 10% or greater postconsumer recycled content.
- 4 Includes applicable green attributes excluding Recycled and Remanufactured.
- 5 Not all products containing third party eco-labels are classified as green products.
- 6 Due to availability of data, indirect spend associated with the calculation of eco-consious spend only includes US global headquarters, therefore we have underestimated eco-conscious spend.
- 7 Combination of actual and estimated data, based on billing period, provided by Office Depot internal team and third-party waste management vendors; excludes data from locations serviced by municipalities that do not provide waste/recycling data to Office Depot; Waste footprint = tonnage sent to landfill, incinerated and/or waste to energy, excluding tonnage that was recycled; note, last year North America's data was reported in short tons.
- 8 This figure excludes diesel fuel beacause it is a very small number.
- 9 Facilities' are buildings owned or leased by Office Depot with utility usage in the reporting year; carbon footprint calculated following the WRI/WBCSD GHG Protocol, using actual and estimated monthly data from natural gas, electricity and propane; Office Depot North America: includes estimated fugitive HFCs emissions and used the US EPA Climate Leaders methodology, some of the reduction in footprint improvement attributed to updated EPA regional emissions factors; OfficeMax North America: estimate based on trend in past three years of reporting; UK and Ireland: used Defra/DECC's GHG Conversion Factors for Company Reporting.
- 10 Actual and estimated based on monthly bills provided by vendors.
- 11 Office Depot does not perform additional procedures to validate data provided by third parties, we are reliant on their reporting accuracy.