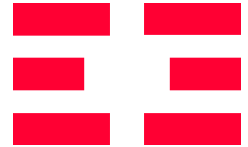




# The ODP Corporation

Subsidiaries: Office Depot, OfficeMax  
Locations: Florida (HQ)  
Industries: Retailing

RISK LEVEL:



High Risk

## DESCRIPTION:

The ODP Corporation is High Risk. The company yields to political activism in shaping corporate governance, potentially alienating consumers, dividing employees, and harming shareholders. The company implements race and identity-based policies that replace merit, excellence, and integrity with preferential treatment and outcomes. ODP embraces corporate initiatives that redirect its central focus from business goals to partisan policies and divisive issues. This approach fails to safeguard free exercise, free speech, and free enterprise.

## Corporate Weaponization

**Has canceled customers, suppliers, or vendors due to their political views or religious beliefs OR corporately boycotts, divests, or sanctions regions, people groups, or industries. Medium Risk**

ODP received a score of 100 on the 2025 Corporate Equality Index (CEI) from the Human Rights Campaign (HRC), a political stakeholder group. The company recruits employees based on sexual identity issues. The company discriminates against vendors that do not promote divisive sex and gender policies, indicating it prioritizes sexual issues over merit (1)(2). In 2015, an Office Depot employee refused to print a suburban Illinois woman's anti-abortion fliers, claiming that the fliers violated company policy (4). However, ODP corporate quickly apologized and allowed the woman to print the fliers (5). The company promotes divisive sex and gender policies. Its Supplier Guiding Principles require international vendors to include sexual orientation in their nondiscrimination policy (6). ODP and its subsidiaries have not had further incidents of publicly terminating business relationships based on political or religious views (7).

**Charitable giving (including employee matching programs) policies or practices discriminate against charitable organizations based on views or religious beliefs. High Risk**

ODP's HRC 2025 CEI rating indicates the company will not donate to non-religious charities unless they embrace controversial sexual identity policies (1)(2). However, the company does not appear to discriminate against charitable organizations based on views or beliefs (3).

**Employment policies fail to protect against viewpoint or other discrimination and/or are ideological in nature. High Risk**

ODP's HRC 2025 CEI rating indicates the company forces employees to attend multiple, controversial trainings on gender identity, sexual orientation, transgender issues, and divisive racial ideology. The company provides gender transition guidelines for its employees and a specific benefits guide with a comprehensive explanation of transgender services funded by the company (1)(2). The company appears to prioritize diversity over merit in its recruitment. From its 2024 Sustainability Report: "Expanded and consistent outreach and recruitment efforts to attract a diverse applicant pool and build a comprehensive understanding of our

workforce to develop an inclusive and engaged associate culture." The company appears to prioritize diversity over merit in its supply chain: "Supporting and promoting diverse companies fosters equal opportunities, resonates with customers' desires, and contributes to the economic success of communities and the larger economy" (3). The company appears to prioritize diversity over merit in its leadership composition. From its 2023 Sustainability Report: "Our Corporate Governance Guidelines speak to our selection of

Directors, who reflect a diverse set of skills, professional and

personal backgrounds, perspectives, and experiences. We are proud to have Directors who are highly diverse with respect to gender, ethnicity, and experience" (4). ODP protects its employees against viewpoint discrimination (5).

## Corporate Governance and Public Policy

**Uses corporate reputation to support causes, organizations, or policies hostile to freedom of expression. High Risk**

ODP's HRC 2025 CEI rating indicates the company agrees to allow a controversial stakeholder group focused on sexual identity issues to dictate marketing or advertising strategy. By doing so, the company risks dividing employees, alienating customers and harming shareholders (1)(2). ODP signed an open letter endorsing the Equality Act, a contentious proposal to amend the 1964 Civil Rights Act by adding sexual orientation and so-called gender identity as protected categories. The legislation would, among other implications, grant biological men access to women-only spaces such as sports teams and public restrooms, and compel healthcare providers to deliver sex-denying healthcare (3). In 2018, Office Depot announced that it would halt its advertising on Laura Ingraham's Fox News show after controversy surrounding the Parkland shooting (4). The company supports DEI within its business practices. From its 2023 Sustainability Report: "In 2022, our company's commitment to promoting diversity, equity, inclusion, and belonging through associate-led efforts and allyship was successful" (5). The company supports ESG within its business practices. From its 2024 Sustainability Report: "The Board of Directors recognizes the importance of sustainability and ESG (Environmental, Social, and Governance) and provides oversight while management works to integrate our program into the company's strategy, products, services, and operations" (6). The company scored a 100 out of 100 on the 2023-2024 Corporate Equality Index (CEI) from the Human Rights Campaign (HRC), a political stakeholder group (7)(8).

**Uses corporate funds to advance ideological causes, organizations, or policies hostile to freedom of expression. High Risk**

ODP's HRC 2025 CEI rating indicates the company covers transgender related costs for its employees and their children, including paid short-term leave, puberty blockers, cross-sex hormones, chest surgeries, genital surgeries, medical visits and lab monitoring, travel and lodging. Additionally, the company has pledged philanthropic support of at least one organization or event that promotes sex and gender ideology. By allowing a political stakeholder group to dictate operations, the company increases health care costs and risks dividing employees, alienating customers and harming shareholders (1)(2). ODP is a corporate partner of the National LGBT Chamber of Commerce (3). Otherwise, there are no publicly known cases of the company using corporate funds to advance ideological causes, organizations, or policies (4).

**Uses corporate political actions and/or financial contributions for ideological, non-business purposes. High Risk**

ODP's HRC 2025 CEI rating indicates the company publicly advocated for controversial sex and gender ideology through local, state or federal legislation or initiatives. By allowing a political stakeholder group to dictate operations, the company risks dividing employees, alienating customers and harming shareholders (1)(2). ODP does not operate a PAC or engage in lobbying at this time (3)

)(4)(5).

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