

Integrity at HP



Integrity at HP



Introduction

03 A message from our CEO

04 Ethical leadership

Our culture

06 The HP Way

08 Act with integrity

10 Winning with purpose and integrity

11 How to raise a concern

Our promise

15 Respect human rights

17 Enable trust

20 Respect others

Our company

24 Promote a safe HP

26 Protect our assets

30 Keep accurate records

33 Do not trade on material non-public
information

35 Speaking on behalf of HP

Our relationships

37 Avoid conflicts of interest

39 Engage responsibly with third parties

41 Never bribe or participate in kickbacks

43 Know the rules about gifts, meals,
entertainment, and travel

46 Compete fairly

49 Putting customers first

51 Know the rules about importing and
exporting

Our impact

54 Minimize our environmental footprint

56 Make a difference

A message from our CEO

One of our greatest strengths as a company is the uncompromising integrity that underpins everything we do. Together, we have built a purpose-driven brand that is trusted by people around the world.

But we can never take this for granted. How we do things is just as important as what we do. Our shared values and culture are the foundation of our success, providing clarity and direction as we navigate an increasingly complex and rapidly changing world.

As we face new challenges and opportunities, it's important to reflect on how our values guide us. They shape the decisions we make, inspire the innovations we develop, and amplify the impact we create for our customers and communities. These same values are critical as we embrace the future of work—our greatest opportunity to empower people and businesses to thrive.

The future of work is about more than technology; it's about creating solutions that deliver growth and enable more fulfilling work experiences, wherever and however people work. As stewards of the HP brand, each of us plays a vital role in strengthening the trust we've built and setting the stage for this transformation.

By leading with integrity and staying true to our values, there is no limit to what we can achieve.

Thank you for all you do.

Enrique Lores
President & CEO



Ethical leadership

HP is a company grounded in integrity, trust, and honesty. These values drive our purpose and guide everything we do. Our commitment to an ethical culture is reflected in our multi-year recognition as one of the World's Most Ethical Companies® by the Ethisphere Institute—an honor that affirms how the HP Way is lived through our collective dedication to people, the planet, and our communities.

Integrity at HP is more than a code of conduct—it's a source of guidance and confidence that empowers us to make the right choices, wherever we are and whatever our role. It applies to all HP employees and all members of our Board of Directors. If you need additional guidance after reading the code, please reach out to the Ethics and Compliance Office using one of the many available channels provided.

Together, we can continue to win with purpose and integrity.

Amy Fox
Chief Ethics & Compliance Officer





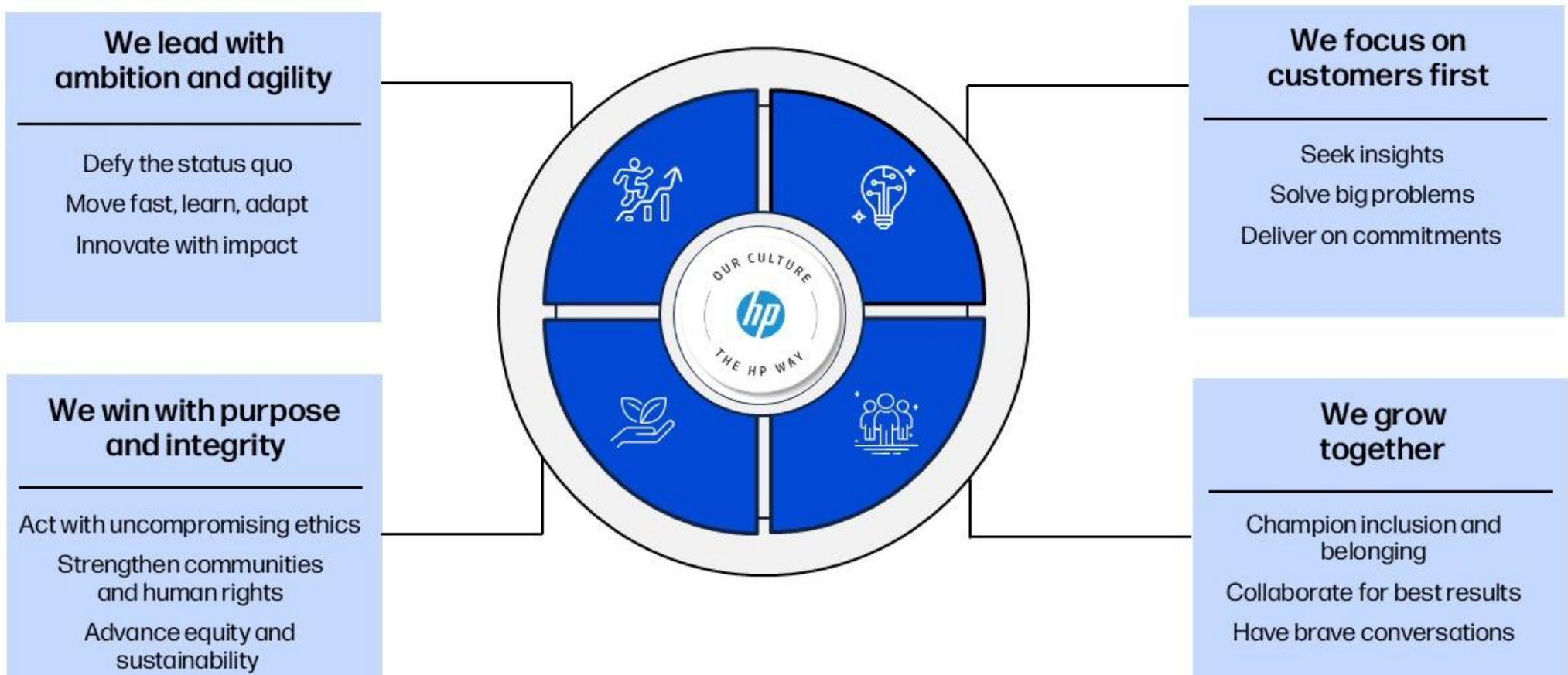
Our culture

- The HP Way
- Act with integrity
- Winning with purpose and integrity
- How to raise a concern


The HP Way

The HP Way is how we do business with ethics and integrity. It remains as vital and impactful today as when HP was founded. The HP Way drives innovation and guides how we create technology that contributes to humanity.

The HP Way Practices are how we bring HP’s vision, mission, and belief to life. Everyone has a role and can contribute to finding solutions, taking risks, having an opinion, and expanding their knowledge to forge a career. Learn more by visiting the [HP Culture](#) page.




What are the HP Way Practices?



We lead with ambition and agility.

At HP, we inspire bold, creative, and aspirational thinking and do not let impediments stand in the way of progress and change.


Ambition is about setting the end state. Agility is about how you get there.



We focus on customers first.

At HP, we start with customers at the center of everything we do by delivering exceptional value and providing unparalleled experiences.


Everyone—no matter their role—contributes to the success of our business and has a part to play in enriching the lives of our customers.



We win with purpose and integrity.

At HP, we do the right thing, especially when it's hard. HP's legacy of purpose drives our commitment to create positive, lasting change for the planet, its people, and our communities.

Our culture has always set us apart, and it continues to be a competitive advantage that drives our success.



We grow together.

At HP, we grow ourselves and each other by adapting to changing dynamics and learning constantly from diverse perspectives.

It's a culture where we all are doing our best, together—and it's a core of the community, supported by our growth and innovation strategy.



Act with integrity

Integrity at HP is a resource for all employees and members of our Board of Directors. It represents the highest level of guidance for our conduct on behalf of HP.

As an employee, you are expected to:

- **Act with uncompromising integrity:** demonstrate your commitment to our values, policies, and the law by always putting integrity first.
- **Raise a concern:** every employee is expected to report any suspected misconduct immediately.
- **Cooperate:** comply with all internal investigations and audits.



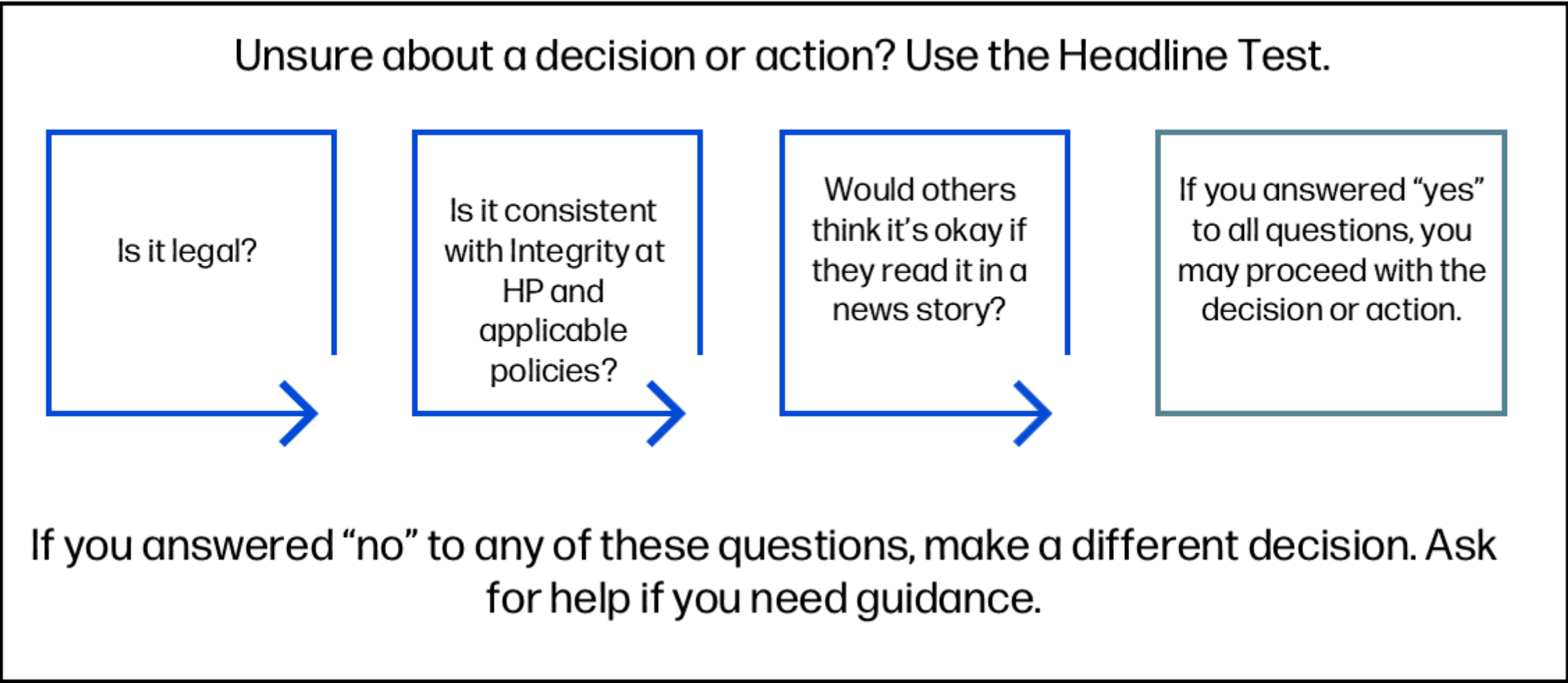
If you are a manager, you must also:

- **Be an ethical leader:** use your good judgment and the Headline Test to ensure your actions demonstrate the highest standards of ethical behavior.
- **Be a resource:** know the [HP Way Practices](#) so you can reinforce those practices with your team and answer their questions.
- **Open your door:** encourage employees to come to you if they want to talk or have questions.
- **Build trust:** take employee concerns seriously, provide guidance, and take appropriate action to prevent, detect, and respond to misconduct. Ask for help from your own manager or the [Ethics and Compliance Office](#) if needed.
- **Never retaliate:** do not retaliate (or let others retaliate) against anyone who raises a concern.
- **Escalate:** every people manager is required to report any suspected violation of Integrity at HP or other misconduct immediately.

The Headline Test

The Headline Test ensures appropriate consideration of the impact of our business decisions.

Before you make a decision, consider how it would look in a news story. If needed, seek guidance from your manager or the [Ethics and Compliance Office](#).





Winning with purpose and integrity

Follow Integrity at HP, our policies, and the law.

Maintain high standards. All of us have a responsibility to do our part to protect our company and its reputation. When someone violates Integrity at HP, other HP policies, or the law, it may result in disciplinary action, up to and including termination. Certain violations can have additional consequences, such as reporting to a government regulator.

Take action when aware of misconduct. Every employee is expected to report any alleged misconduct immediately. Use our [Global Open Door Policy](#) to raise concerns. Managers must encourage open and honest communication.

Never retaliate. Every HP employee must feel free to speak out about potential Integrity at HP violations without fear of retaliation. HP does not tolerate retaliation against anyone who raises a concern or asks a question.

Cooperate with investigations. Reports of misconduct are reviewed, investigated if appropriate, and treated confidentially to the extent possible to conduct a fair and appropriate investigation.

Everyone who works at HP has a responsibility to:

- Participate fully and honestly with investigations and audits. Employees of HP subsidiaries are required to cooperate with internal HP investigations.
- Cooperate with Legal or your designated legal support to respond to litigation or requests from government and other external agencies.
- Never act in any manner that would interfere with an investigation, including destroying or fabricating evidence, intimidating witnesses, or improperly disclosing information in a manner that impedes a fair review.
- Follow instructions to retain and preserve records in response to litigation, investigations, or audits.



How to raise a concern

At HP, we believe everyone’s voice should be heard and we are committed to maintaining an environment where employees feel comfortable raising concerns without fear of retaliation. If you believe someone may have violated Integrity at HP, our policies, or the law, you are expected to speak up immediately, and we offer a variety of resources to help you do so.

Your manager is usually the best place to start. When it is not possible to raise or resolve an issue with your immediate manager, use the [HP Global Open Door Policy](#) to discuss it with:

- Another leader
 - [The People Organization](#)
 - [Legal or your designated legal support](#)
 - [Your Integrity at HP country team](#)
 - [Your business group or market Integrity at HP liaison](#)
 - [Internal Audit](#)
- Ethics and Compliance Office:
 - [Online web form](#)
 - Telephone*: from anywhere in the world, call the in-country phone line to report concerns. The phone line is available 24 hours a day and supports anonymous reporting. To find your in-country phone line, select your country from the “[Call Us](#)” dropdown list.
 - Via mail:
HP Inc.
Ethics and Compliance Office
1501 Page Mill Road, Mailstop 1560
Palo Alto, CA 94304-1112
United States

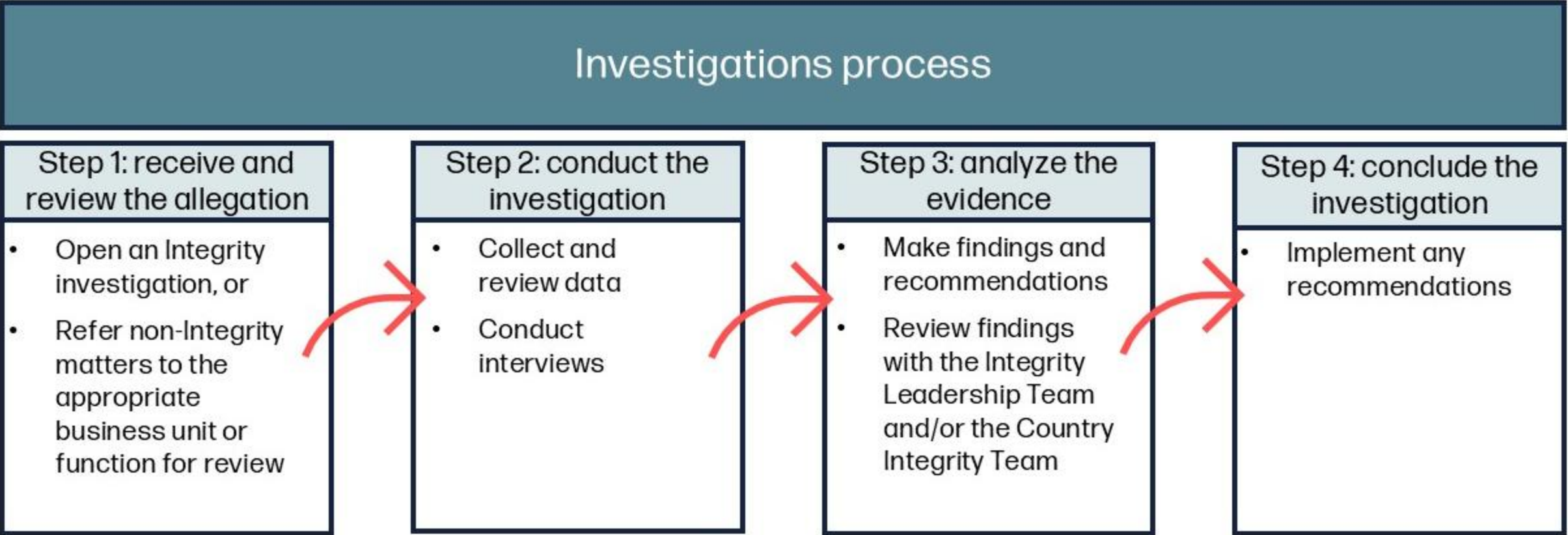


Regardless of the resource you contact, you can be assured that your concern will be handled promptly and appropriately.

*The telephone line is managed by a third party.

What happens after you raise a concern?

All Integrity at HP investigations follow a process designed to ensure consistency and fairness. HP is committed to maintaining an environment where employees feel comfortable raising concerns without fear.





Learn more

Policies	Resources
<ul style="list-style-type: none">• Global Best Work Environment Policy• Global Misconduct Policy• Global Open Door Policy• Litigation and Investigations Policy	<ul style="list-style-type: none">• How to report a concern webpage• Integrity Central• Records and Information Management



Integrity in action

My manager suggested I do something that seems to violate our policies. It feels wrong, but I am afraid I will be fired if I do not do what she asks. Should I just go along with it?

No, you should not. No one at HP has the authority to direct you to do something that violates our policies or the law. Before you act, review Integrity at HP. If the action seems wrong, let your manager know you cannot do it and why. If your manager insists, or if you are uncomfortable approaching your manager directly, share your concerns with another member of management or another internal resource right away.



Our promise

- Respect human rights
- Enable trust
- Respect others

Respect human rights

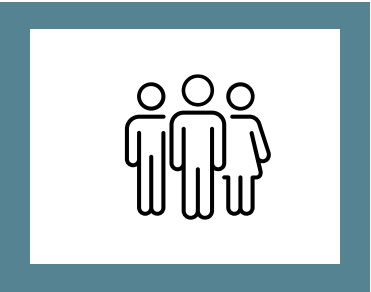
Conduct business in a way that respects human rights.

Respect fundamental rights and freedoms. Our commitment to upholding human rights is a core value at HP, shaping how we do business globally. We are committed to respecting internationally recognized human rights. We implement our human rights commitments by undertaking ongoing human rights due diligence to identify, assess, mitigate, and account for actual and potential adverse human rights impacts in our operations and throughout our value chain.

Raise a concern. HP does not tolerate retaliation against anyone who raises a concern. If you believe your rights have been infringed upon or you witness retaliation, report it to your manager or to another [internal resource](#). Investigations in response to concerns raised are conducted in an appropriate, objective manner, and are free from undue influence by management or the business.

Live up to our values. Respecting human rights is everyone’s responsibility at HP. We also expect our suppliers and other business partners to share our commitment. We set human rights expectations for our suppliers and other business partners in our [Supplier Code of Conduct](#) and [Partner Code of Conduct](#). We incorporate these expectations into contractual and other arrangements.

Our performance is shared in HP’s annual [Sustainable Impact Report](#) and through other mandatory and voluntary reporting channels.



HP commits to respecting human rights as expressed in the International Bill of Human Rights and in the International Labour Organization’s Declaration on Fundamental Principles and Rights at Work. HP also commits to upholding the UN Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises.

Examples of key human rights:

- Forced labor
- Child Labor
- Health and safety
- Nondiscrimination
- Rest and leisure (working hours)
- Privacy



Learn more

Policies

- [Contingent Worker Code of Conduct](#)
- [HP Human Rights Policy](#)
- [HP Partner Code of Conduct](#)
- [HP Supplier Code of Conduct](#)

Resources

- [Modern Slavery Transparency Statement](#)
- [Sustainable Impact at HP](#)

Enable trust

Maintain an environment with trusted digital experiences and data practices.

As an HP employee, you are committed to complying with all policies, procedures, and controls implemented by HP, including any voluntary frameworks HP participates in, such as Binding Corporate Rules. Failure to adhere to HP’s [Global Master Privacy Policy](#), HP’s [Binding Corporate Rules](#), or any other privacy policy or process may lead to corrective action, up to and including termination.

Respect privacy and personal data. We recognize that privacy is a fundamental human right. We also know that privacy, security, and data protection are increasingly important to maintaining the trust of our employees, customers, and partners worldwide. As an HP employee, you must follow our policies and all applicable laws in collecting, accessing, using, storing, sharing, and disposing of personal data. Be transparent about HP’s practices and provide privacy preference options to the individuals you work with. Use personal information only for legitimate HP business purposes.

Go beyond compliance. As we engage in automated processing capabilities, big data analytics, and machine learning—while relying on artificial intelligence for decision making—we are committed to applying principles of integrity and inclusion in our data governance.

Act responsibly when sharing personal data. We are committed to sharing data responsibly within our business operation. Personal data should only be shared when a third party signs a contract that ensures they will provide equal levels of data protection. We do not, and will not, sell personal data to third parties.



What is “personal data”?

“**Personal data**” is anything that could be used to identify someone, either directly or indirectly, such as a name, email address, phone number, credit card number, government ID number, location data (GPS, IP address), or device serial number.

“**Sensitive data or special category of personal data**” is a subset of personal data that requires additional safeguards. It is categorized as a specific set of personal data that must be protected against unwarranted disclosure or unauthorized access, including racial or ethnic origin, political opinions, religious or philosophical beliefs, children’s data, health information, sexual orientation, gender identification, or biometric data. Some jurisdictions may also consider precise location and financial data as sensitive information.

Where are our risks?

- Partnering with third party websites and applications—HP’s brand is at stake if they are non-compliant
- Using personal data in ways beyond the intended purpose
- Accidentally sharing personal data to unintended audiences
- “Free” or individually purchased internet hosting, collaboration, or cloud services—we cannot guarantee data privacy
- Social engineering—when you are asked to share personal information, first authenticate the request
- Using customer lists with unclear contact preference



Learn more

Policies

- [HP Binding Corporate Rules](#)
- [HP Global Employee Privacy Policy & Notice](#)
- [HP Global Master Privacy Policy](#)
- [HP Job Applicant Privacy Notice](#)
- [HP Personal Data Retention Policy](#)
- [HP Privacy Statement](#)

Resources

- [HP Privacy Rulebook](#)
- [Privacy @HP](#)
- [Privacy Risk Review Process](#)
- [Report a Privacy Incident](#)



Integrity in action

One of our team members recently had a baby and I wanted to send her a card to congratulate her on the new addition. My manager said she could not provide my colleague's home address. It is just a greeting card—is this taking privacy too far?

No. Even though this is a kind gesture, your manager has an obligation to protect this information. You could contact your colleague through your work email to ask for her address directly, or you could wait until she has returned to work to offer your best.

Respect others

Treat all people—inside and outside the company—with fairness, dignity, and respect.

Champion inclusivity. HP values inclusion and individual differences—including those based in race, ethnicity, gender, nationality, ability, military status, religion, generation, or sexual orientation. We engage top industry talent to drive our company’s long-term success. HP benefits from the creativity and innovation of employees with different experiences, perspectives, and cultures working together.

Focus on fairness. We practice equal opportunity in employment and embrace the diversity of all HP employees. As stated in HP’s policies, we do not discriminate against any employee or applicant based on the individual’s membership in a legally protected class, including gender, color, race, ethnicity, national origin, religion, age, marital status, sexual orientation, gender identity and expression, disability, pregnancy, covered veteran status, protected genetic information and political affiliation.

No retaliation. Every HP employee should feel free to speak up without fear of retaliation when they have a concern about misconduct or deviations from our policies and standards. HP does not tolerate retaliation against anyone who raises a concern of misconduct or a potential violation of HP policy or who assists or participates in investigations.

Promote trust and respect. We all must promote and encourage an inclusive work environment, free of harassment and must not behave in a disrespectful, hostile, violent, intimidating, threatening, or harassing manner. HP does not tolerate any form of sexual harassment, including unwanted sexual advances, requests for sexual favors, the display of sexually explicit materials, or any other verbal or physical conduct of a sexual nature.





What is HP’s work environment?

HP’s work environment is defined as anywhere HP employees are conducting business on HP’s behalf, including in person by phone, in virtual meeting spaces, through email or other internet communication channels, on HP premises and at company-sponsored events, or during travel on behalf of HP.

Watch out for...

- Inappropriate behavior that includes sharing derogatory texts, emails, or gestures based on a protected class
- Unwanted sexual advances
- Threats, assaults, or name-calling
- Jokes or comments that are inappropriate or offensive





Learn more

Policies	Resources
<ul style="list-style-type: none">• Global Best Work Environment Policy• Global HP-Sponsored and Non-HP-Sponsored Event and Attendance Policy• Global Open Door Policy	<ul style="list-style-type: none">• Integrity Central



Integrity in action

A woman on my team just confided in me about her manager who, despite prior refusals, continues asking her on dates. She even asked me to walk out of the office with her at the end of the day. She is obviously uncomfortable but says she doesn't want to report it. Should I respect her wishes?

Not in this case. Despite what your colleague says, she may be experiencing harassment in violation of HP's policies. Speak up about this situation immediately by contacting the [People Organization](#), another manager, or the [Ethics and Compliance Office](#).



Our company

- Promote a safe HP
- Protect our assets
- Keep accurate records
- Do not trade on material non-public information
- Speaking on behalf of HP



Promote a safe HP

Put the safety and security of people first.

Prevent safety risks. All employees must comply with safety, health, and security policies and procedures and be proactive in preserving their safety and the safety of those around them. You must not sell, possess, or use illegal drugs or create a safety risk through drug use or intoxication while on HP property or while conducting HP business. If you see a situation that could put others at risk, report it to your manager.

Keep HP violence-free. Threats, acts of violence, and physical intimidation have no place at HP. Follow good security practices and be aware of your environment. Immediately contact your manager or another internal resource about any situation that could jeopardize safety at HP.

Prevent system breaches. Keeping our systems safe from inappropriate access and disclosure is everyone’s responsibility. We all must understand HP data security policies, standards, and specifications. Never provide access to our systems or sensitive data to anyone unless you can provide the information securely while following HP’s official processes and procedures. You must also be sure that the recipient is who they claim to be, has authorized access, and has a valid business need.



How to prevent viruses and breaches

- Never share your password(s) with anyone
- Secure your workstation when you step away
- Only use hardware and software provided or approved by HP
- Never download or use pirated software or software from unapproved sources
- Never access our network via unauthorized devices or applications
- Be alert to phishing scams—do not open suspicious links or attachments in emails
- Secure your home office and network
- Never use untrusted USB drives—they may contain viruses
- Never allow unauthorized individuals to use your work devices (including friends and family)



Learn more

Policies

- [Global HP-Sponsored and Non-HP-Sponsored Event and Attendance Policy](#)
- [HP Security Policy](#)
- [Workplace Violence Prevention Policy](#)

Resources

- [HP Cybersecurity Awareness Best Practices](#)
- [HP Cybersecurity home page](#)
- [Preventing/Reporting Phishing and Ransomware Attacks](#)
- [Report information security incidents](#)



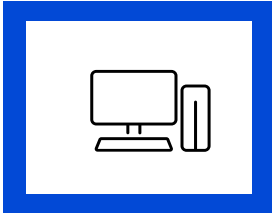
Protect our assets

Preserve our competitive advantage in the marketplace.

Safeguard our physical assets. It is important to do your part to protect HP assets—including but not limited to, phones, computers, and HP-sponsored credit cards—from theft, fraud, loss, damage, and waste. You must never use HP assets to promote your personal or political interests or allow other people, such as friends or family, to use HP resources. Additionally, you should follow HP procedures for reuse, redeployment, and return of all work equipment upon leaving HP.

Safeguard our electronic assets. Be responsible when you use HP hardware, software, voicemail, and email. Keep personal use to a minimum and never use our systems to violate the law.

Safeguard the HP brand. The HP brand is our corporate identity and an integral part of our intellectual property, and therefore it holds significant value. Any use of our brand by anyone outside of HP must be reviewed and approved by the appropriate HP group. Each of us has a duty to protect our brand by following the brand standards.



How do we protect our intellectual property?

- Patents to protect inventions
- Trademarks to protect the HP brand
- Copyrights to protect software, documents, images, and videos
- Domain registrations to protect domain names
- Agreement regarding confidential information and proprietary developments signed by all employees at the time of hire
- Labeling HP sensitive information
- Agreements with obligations to protect HP’s non-public information, including trade secrets, when disclosed outside of HP, such as a Confidential Disclosure Agreement (CDA)
- Agreements with terms related to the license or ownership of intellectual property
- Implementation of technical security controls to prevent the unauthorized release of sensitive data



Safeguard sensitive information. Information about our company, products, customers, business partners, suppliers, and processes are our most valuable assets. To protect our sensitive information (non-public information), you should always:

- Label it properly
- Use it only for business purposes
- Share it only with those who have a legitimate business need
- Properly store sensitive information and dispose of it appropriately when no longer needed
- Encrypt sensitive information and protect it with role-based access controls
- Have permission from the HP business unit that owns or controls the sensitive information to disclose it outside of HP
- Comply with cybersecurity policies and controls when disclosing sensitive information outside of HP
- Have a signed agreement with recipients outside of HP that obligates them to protect the sensitive information, such as a Confidential Disclosure Agreement (CDA)

Where is the risk?

- Sending work emails containing sensitive information to your personal email account
- Discussions about sensitive information in public places, such as planes, elevators, and restaurants
- Borrowing or using HP assets to conduct non-HP business without prior approval
- Phishing messages impersonating customers, partners, employees, tech support, etc.
- Using personal or unapproved cloud services to store HP data
- Using unapproved Instant Messaging platforms for confidential business communications
- Downloading or using pirated software or software from unapproved source
- Disclosing HP sensitive information without an agreement obligating recipients to protect the information
- Failing to specify with developers or partners ownership of developed intellectual property that is to be owned by HP
- Using artificial intelligence (AI) tools or services that have not been approved by HP’s Center for Data Science and HP Cybersecurity

Which label should you use for HP sensitive information?

- Internal Use Only: information intended for widespread distribution within HP.
- HP Confidential: information that may be shared with limited audiences within HP based on a business need to know. The information may be shared outside HP by those authorized to disclose it, and in compliance with HP policies.
- Private: information prepared for HP’s executives and other top managers. This information must be handled so as to ensure access is only by those authorized by the HP executive or other functional owner of the information.

Only one label at a time should be used on HP sensitive information. Be sure to review the label on template footers, such as those on presentation slides, and if the label does not apply, replace it with one that does.

You should never take HP’s sensitive information with you if you leave HP. You should also never post our sensitive information on social media.





Learn more

Policies	Resources
<ul style="list-style-type: none">• Confidential Information Policy• HP Cybersecurity policies, standards, and specifications• HP Instant Messaging Policy	<ul style="list-style-type: none">• Brand Central• CDA Portal• HP Cybersecurity Awareness Best Practices• HP Cybersecurity home page• Matrix For Handling and Managing the Company's Information Assets• Preventing/Reporting Phishing and Ransomware Attacks• Report information security incidents



Integrity in action

As part of my responsibilities at HP, I am working with a with a partner that needs HP confidential information to develop new software code for HP. I expect HP to own the new software code. Does a Confidential Disclosure Agreement (CDA) provide HP with ownership of the new software code?

No. A CDA is not a development agreement and does not include terms related to ownership of intellectual property developed using the confidential information disclosed under the agreement.

Keep accurate records

Make business decisions based on complete and accurate information.

Insist on accurate business records. Accurate and transparent records are essential to how we manage our business; prevent fraud, corruption, and money laundering; maintain compliance with financial reporting regulations; and uphold credibility with our customers and our stakeholders. It’s important that you create business records that accurately reflect the truth of the underlying transaction or event.

You must follow all financial policies and reporting guidelines, including the [Accounting and Finance Manual](#). You must obtain approvals where required and be prepared to provide supporting documentation.

What are “business records”?

Business records are valuable HP information assets that are created, received, and maintained as evidence of HP’s business transactions or compliance with legal obligations. These assets include, but are not limited to, time sheets, purchase orders, invoices, expense reports, emails, and regulatory filings.

Stay alert. If accessing records is a regular part of your job, watch for any irregularities that might signal fraud, bribery, or other illegal activity. This includes false entries, discrepancies, omissions, misleading entries, and unrecorded funds. [Raise a concern](#) about any unusual activity immediately. Employees who have questions about records should contact the Global Records Management team or their department’s Records Coordinator or Records Officer.

Preserve materials subject to legal hold. You must not delete or destroy any records or materials that are subject to a legal hold or relate to ongoing litigation, investigations, or audits. Be sure you suspend any manual or automated practices that might lead to the deletion or destruction of any such records or materials. Employees departing HP whose records are on legal hold – or the managers of these employees – must contact the [Litigation Department](#) prior to deleting or destroying any information.

How long should I keep “non-records”?

If it is not a record, do not keep information longer than two years unless there is a valid business need to keep the information, or the information is subject to a legal hold.



Anti-money laundering. Money laundering is the process by which funds generated from criminal activity are moved through legitimate businesses to hide their criminal origin. You must never knowingly facilitate money laundering and must take steps to prevent the use of HP's business activities for these purposes. You must be vigilant and exercise good judgment when dealing with customers or business partners, know who they are, what kind of business they are in, and the origin of their funds. You must immediately report any unusual or suspicious activities or transactions.

You must not:

- Establish any off-the-books funds or undisclosed or unrecorded assets or liabilities
- Backdate contracts or other documents
- Create side letters or side agreements
- Sign documents that you are not authorized to sign
- Alter records or make false or misleading entries

What is “channel stuffing”?

Channel stuffing occurs when a company sells more products into a distribution channel than required by customers in the market to inflate sales and earnings.

Channel stuffing creates the appearance of demand in a given channel or market that does not actually exist. This typically occurs just before quarter-end or year-end so that sales quotas can be reached.

What are the potential consequences for HP?

- Channel stuffing may result in unfair sales targets.
- Channel stuffing may lead to the creation of inaccurate records.
- Channel stuffing may undermine trust in the company brand, potentially causing partners and customers to shift toward competitors.





Learn more

Policies	Resources
<ul style="list-style-type: none"> • Accounting and Finance Manual • Anti-Corruption Policy • HP Global Travel Policy • Litigation and Investigations Policy 	<ul style="list-style-type: none"> • Anti-Corruption FAQs • Integrity Central



Integrity in action

In compiling end-of-quarter data, my manager directed me to change information on an invoice that I don't think is accurate. She did not provide me with any documentation to support this change. What should I do?

You have a responsibility to be honest and to record information in a way that fully and accurately reflects every transaction. Ask your manager for the supporting documentation. If she does not provide it, report the issue to another member of management or an internal resource.

Do not trade on material non-public information

Protect confidential information and never use it to make trades or tip others.

Know what to protect. Material, non-public information is any information (positive or negative) about HP, our customers, or business partners that is not publicly available but might be useful to an investor or that changes the total mix of available information to make an investment decision. You might have access to this information through your role and it is your responsibility to keep it confidential. Using this kind of information to trade is called insider trading, which is illegal and unfair to other investors. Insider trading has serious consequences, including potential civil and criminal prosecution of you and HP.

Do not trade or tip on it. If you come across inside information through your work or through another person—even if it is just something you overheard—do not trade on it. It is also important that you do not share this information with anyone, including family or friends. This activity is called “tipping,” which is another form of illegal insider trading.

Understand the rules. It is important to familiarize yourself with our [Insider Trading Policy](#). Even exercising employee stock options may be considered a “trade,” so follow the rules about quarterly trading restrictions and windows.

Inside information includes information such as:

- Earnings information
- Forecasts
- New product offerings
- Business strategies
- Potential mergers, sales, or acquisitions
- Management changes





Learn more

Policies	Resources
<ul style="list-style-type: none"> • <u>Confidential Information Policy</u> • <u>Insider Trading Policy</u> 	<ul style="list-style-type: none"> • <u>Trading Window Calendar</u> • <u>Insider trading compliance</u>



Integrity in action

My work involves mergers and acquisitions. I mentioned a possible new acquisition to my husband over dinner but cautioned him not to share the information with anyone else. Did I do anything wrong?


Yes, it is important to keep inside information private, even from family and friends. If your husband trades based on this information or shares the information with someone else (“tipping”), he—and you—could violate our policies and the law.

Speaking on behalf of HP

Allow only authorized individuals to speak for our company.

Rely on the experts. HP has designated individuals to speak on behalf of our company to ensure that all information disclosed about HP is accurate, consistent, and complete. Unless you are authorized to do so, you should not make any public statements on HP’s behalf and should refer all HP business-related communications or questions from investors, analysts, and the media to HP Investor Relations or [HP Corporate Communications](#).

Use social media wisely. In any online communication platform (including user forums, blogs, chat rooms, bulletin boards, and other social media), you should understand and follow HP’s policies, including our [Global Social Media Governance Policy](#), regarding the use of social media. You must make it clear on your social media that your views are your own and do not represent the views of HP. With HP-related communication, you should never give the impression that you are speaking on behalf of HP unless you have been authorized to do so. You should not disclose sensitive or proprietary business information about HP, our customers, suppliers, or other business partners. You must never use slurs, insults, obscenities, or other words that might constitute a threat, intimidation, harassment, or bullying.



Integrity in action

I recently read a blog by an industry insider. He mentioned some features about an upcoming HP product release that was incorrect. I was part of the team that developed the product, and I am knowledgeable about the product. Is it OK for me to post a comment on his blog since I have firsthand knowledge to share?

No. You should refer information about the blog to HP Corporate Communications at mediarelations@hp.com and allow them to speak on HP’s behalf.



Our relationships

- Avoid conflicts of interest
- Engage responsibly with third parties
- Never bribe or participate in kickbacks
- Know the rules about gifts, meals, entertainment, and travel
- Compete fairly
- Putting customers first
- Know the rules about importing and exporting

Avoid conflicts of interest

Make decisions that are in HP’s best interest.

Proactively address potential conflicts of interest. We all have activities, interests, and relationships outside of HP, but they should never influence or appear to influence the decisions we make on behalf of HP. It is your responsibility to recognize and avoid situations that could be perceived as a conflict of interest. If required under HP’s [Conflicts of Interest Policy](#), you must promptly disclose the potential conflict of interest. Failure to be transparent about conflicts of interest can lead to distrust and the appearance of fraud or corruption. If you are unsure, discuss the situation with your manager and consult the [Conflicts of Interest policy](#).

How can potential conflicts of interest arise?

- Being employed by or conducting non-HP business with an HP business partner, supplier, channel partner, or customer
- Investing or having a financial interest in an HP business partner, supplier, channel partner, or customer
- Having family or close personal relationships within HP
- Pursuing a business opportunity that you learned about through your work at HP
- Serving on a board of directors or as an advisor to an organization

What are “financial interests”?

Financial interests include investment, ownership, and creditor interests, as well as any other financial arrangement that provides a share of profits or revenues.

Who are “immediate family members”?

Immediate family members include spouses, domestic partners, parents, step-parents, children, step-children, siblings, and in-laws, as well as anyone residing in an immediate family member's home other than a tenant or employee.

What are close personal relationships”?

Close personal relationships include romantic relationships and may also include other relationships, particularly financial relationships such as partners in ownership of a business or property.



Learn more

Policies

- [Conflicts of Interest Policy](#)

Resources

- [Integrity Central](#)



Integrity in action

My spouse is planning to start a business, providing marketing services. The business intends to approach HP to promote HP products. Are there any conflict-of-interest concerns with this?

It depends on your role at HP and whether it influences the selection of the marketing vendor and/or the management of the relationship thereafter. HP's [Conflicts of Interest Policy](#) states that you should not be involved in HP business decisions with third parties with whom you have a close personal or financial relationship. In this case, you should discuss the matter with your manager and review the [Conflicts of Interest Policy](#).

Engage responsibly with third parties

Hold our business partners and suppliers to the same high ethical standards we set for ourselves.

Communicate our expectations. We must ensure that our business partners and suppliers share our commitment to conducting business with integrity and respecting human rights, inclusivity, health, safety, and the environment. Our expectations are set out in our [Partner Code of Conduct](#), [Supplier Code of Conduct](#), and [Contingent Worker Code of Conduct](#). Our partners and suppliers must meet our quality, delivery, service, and pricing standards.

Follow onboarding policies. We must comply with all applicable onboarding policies and processes when engaging third parties, including HP’s [Global Indirect Procurement Policy](#) (for suppliers) and the [Partner Legal and Regulatory Compliance Policy](#) (for channel partners). This helps to ensure that third parties are properly screened for corruption, trade compliance, and money laundering risk. All contracts with third parties must be in writing and clearly describe their obligations and ours.

Monitor compliance. We have a responsibility to monitor contractual arrangements to promote compliance with the law and our policies, and to prevent fraud. Report any HP policy violation concerns by third parties and terminate contracts with those who fail to address violations of our standards.

Who are third parties?

Third parties include: channel partners, vendors, suppliers, consultants, contractors, contingent workers, agents, or other third parties doing business on behalf of HP.





Learn more

Policies	Resources
<ul style="list-style-type: none">• Contingent Worker Code of Conduct• Global Indirect Procurement Policy• HP Partner Code of Conduct• HP Supplier Code of Conduct• Partner Legal and Regulatory Compliance Policy	<ul style="list-style-type: none">• HP Partner Portal• HP Supplier Portal• Sustainable Impact at HP• Third party onboarding processes



Integrity in action

I just learned that one of our channel partners was accused of bribing one of their customers. The allegation has not been proven, and it does not involve HP. Should I do anything?

Yes. Any potential violation of the law or HP policy by a third party is cause for concern. You should share this information with your manager or Legal as soon as possible.

Never bribe or participate in kickbacks

Always behave with uncompromising integrity in our business dealings and avoid even the appearance of fraud or impropriety.

Maintain integrity at all costs. Bribery involves creating or exploiting conflicts of interest and includes any payment, benefit, or other thing of value provided to improperly win or retain business, secure an improper advantage, or otherwise improperly influence a decisionmaker. We must never offer or receive bribes, kickbacks, or other improper payments—even if it means losing business.

Do not make facilitation payments. A facilitation or “grease” payment is a small payment of cash or something of value made to a government official to secure or expedite the performance of a routine government action. All facilitation payments are prohibited. Any request for a facilitation payment must be reported immediately.

Monitor third parties. We are responsible for the actions of third parties that conduct business on HP’s behalf. Ensure that our discounts, rebates, commissions, marketing funds, and other HP funds will not be used fraudulently to fund bribes or kickbacks. Do not ignore “red flags” that a third party may be making improper payments or engaging in corrupt or fraudulent behavior on HP’s behalf.

Additional rules for healthcare. Special kickback rules may apply to healthcare professionals and customers. Be sure to check and follow HP policies when giving anything of value to the healthcare sector.

Speak up. You must report any bribes, kickbacks, or other improper payments, as well as any related requests or offers, to your manager, Legal, or the Ethics and Compliance Office.

Can you recognize a bribe?

A bribe can happen in many forms, including:

- A payment
- A gift
- A favor
- A job offer
- Entertainment or travel offer

Even a charitable or political contribution could be considered a bribe if it influences a decision.



Learn more

Policies	Resources
<ul style="list-style-type: none">• Anti-Corruption Policy• Contingent Worker Code of Conduct• HP Partner Code of Conduct• HP Supplier Code of Conduct	<ul style="list-style-type: none">• Anti-Corruption FAQs• Anti-Corruption Manual• Anti-Corruption Red Flags



Integrity in action

A long-time, trusted partner is bidding for a contract with a public sector entity and requested a steeper discount than normal. The partner indicated the discount will offset “extra costs,” but refused to provide any further explanation. Does this raise any red flags?

Yes. Any request for a discount must follow HP sales policies and be accompanied by a meaningful business justification. Requests for additional discounts or compensation, no matter how small, should be carefully examined. If you have any reason to believe the partner may be using the additional funds to bribe government officials, you must deny the request.



Know the rules about gifts, meals, entertainment, and travel

Only provide and accept gifts, meals, entertainment, and travel when it's appropriate.

Comply with our policies. We must give and receive gifts, meals, travel, and entertainment only if it complies with HP's [Global Business Amenities Policy](#). We should avoid even the appearance of a business decision being influenced by what we gave or received.

Meet our obligations. Make sure you check allowable limits and obtain any approvals required by our policies prior to giving or receiving gifts, meals, entertainment, or travel. Know that the rules for what you give to government and healthcare representatives are stricter than those in the commercial sector, and the government and healthcare representative rules vary by country. You are also responsible for maintaining accurate records for any gifts, meals, entertainment, or travel as required by HP policy. Reimbursement requests must follow HP's employee expense management process and must be accurately classified and include all required information, including attendees.

Take extra care if combining business and personal travel. You may need additional approvals and should always consult the [HP Global Travel Policy](#) for guidance.





How do I know if a gift is acceptable?

Reasonable gifts offered in the normal course of business can be perfectly acceptable, but any offer that creates a sense of obligation or would appear improper is always inappropriate. Do not take a risk—always ask your manager or Legal if you are unsure.

All gifts or entertainment must:

- Be intended only to improve HP’s image, better represent products and services, or foster goodwill in business
- Appear reasonable and legitimate to an outsider
- Never be given in exchange for something in return
- Never be solicited
- Not violate the policies of the recipient’s organization

Examples of inappropriate business amenities:

- Any amenity that creates an appearance of impropriety, undue influence, or conflict of interest
- Cash, loans, stock, cash-equivalent gift cards (AMEX and VISA), precious metals, or gemstones
- Any item that is illegal or sexually explicit
- Any gift that violates the recipient’s gift policies
- Any item provided in exchange for an improper advantage
- Gifts provided during a competitive bid process or contract negotiation
- Business amenities provided or received through a third party that the policy would otherwise prohibit you to receive directly



Learn more

Policies	Resources
<ul style="list-style-type: none">• Anti-Corruption Policy• Conflicts of Interest Policy• Contingent Worker Code of Conduct• Global Business Amenities Policy• HP Partner Code of Conduct• U.S. Business Amenities Policy• HP Global Travel Policy	<ul style="list-style-type: none">• Anti-Corruption FAQs• Anti-Corruption Red Flags• Employee Reimbursement Hub• HP Amenities Approval Tool• Integrity Central



Integrity in action

During a discussion of a new tender opportunity, a prospective customer mentioned that he supports the same local football club as me. I have two tickets to an upcoming game that I won't be able to use. The tickets are not expensive. May I offer them to the customer?

No. Since the prospective customer is not attending with you, this is considered a gift. While a meal or meeting to discuss a bid may be acceptable, we prohibit gifts during bids or contract negotiations. Even if the tickets are inexpensive, if you offer them during a competitive bidding process, it could create the appearance that we are trying to improperly influence the prospective customer's decision.

Compete fairly

Win the right way by marketing responsibly and competing vigorously and lawfully.

Honor our legacy. At HP, we work fairly and passionately. We compete based on the merits of our products and services and we avoid any unfair trade.

Follow the law and HP policies. Countries around the world have competition laws, and violations can result in significant legal consequences for HP and for you. Be sure you understand and follow competition laws in the countries where we operate.

Competition laws govern HP’s interactions with:

- Partners
- Competitors and potential competitors
- Customers
- Suppliers and other vendors
- Alliances

Avoid improper agreements or concerted practices. We conduct business ethically, never entering into any improper agreement with a competitor, customer, supplier, or other business partner—either formally or informally—about pricing, margins, costs, terms or conditions of sale, and wages, or the division of customers, suppliers, or markets. Improper agreements or concerted practices can be inferred from the behavior of two or more parties—they do not need to be specifically expressed or formally written. An informal understanding, inferred behavior, or subsequent parallel action can constitute such improper behavior.

Be aware of agreements that discuss:

- Prices and pricing elements, including discounts, rebates, and terms
- Preventing a company from entering the market
- Refusing to deal with a customer or supplier
- Limiting production, sales, or output
- Market or customer allocation
- Bid rigging



Bid fairly. Bid rigging happens when competitors or partners manipulate bidding to limit competition. It can include express or tacit agreements to compare or split bids, agree not to bid, or agree on who will submit the winning bid. If you are involved in the bid preparation process, comply with the law and our policies.

Market fairly. When you speak with customers—whether in-person or through our advertising, marketing, or sales materials—provide only truthful information about our products and services. Do not make false or illegal claims about our competitors and never use deception or misrepresentation to gain an unfair advantage over them.

Obtain business intelligence appropriately. We have a responsibility to protect and honor all confidentiality duties and disclosure limitations. Do not use or share with HP any confidential information from a former employer or other third party if the information is subject to such limitations. Also, it’s important that you do not hide your identity or ties to HP when gathering information.



Competitively sensitive information should not be shared with competitors. This includes:

- Customer-specific or product-specific pricing information that is either current or future-focused
 - Sharing aggregated, historical, and non-customer or product-specific pricing information is generally lower risk if competitors are not able to discern specific product line or customer information.
- Confidential future product roadmaps
 - Sharing historical or high-level product roadmaps is generally lower risk if competitors cannot discern the confidential business strategy.
- Customer pipeline or prospect information
- Any other competitively-sensitive information prior to counsel consultation



Learn more

Policies	Resources
<ul style="list-style-type: none">• Confidential Information Policy	<ul style="list-style-type: none">• Corporate Sales and Marketing Resource Center• Integrity Central



Integrity in action

I was at an industry conference and during a lunch break, a friend working for a competitor approached me to discuss whether we could agree on which lots to bid in an upcoming tender so that everyone wins. Embarrassed, I changed the topic immediately, since I knew it was wrong. Did I handle the situation correctly?

You did not participate—which is good—but if you do not speak up about what happened, others may think you were complicit in the discussion. The best action would be to stop the conversation, remove yourself from the situation, and report the incident to Legal.

Putting customers first

Insist on a high standard of quality.

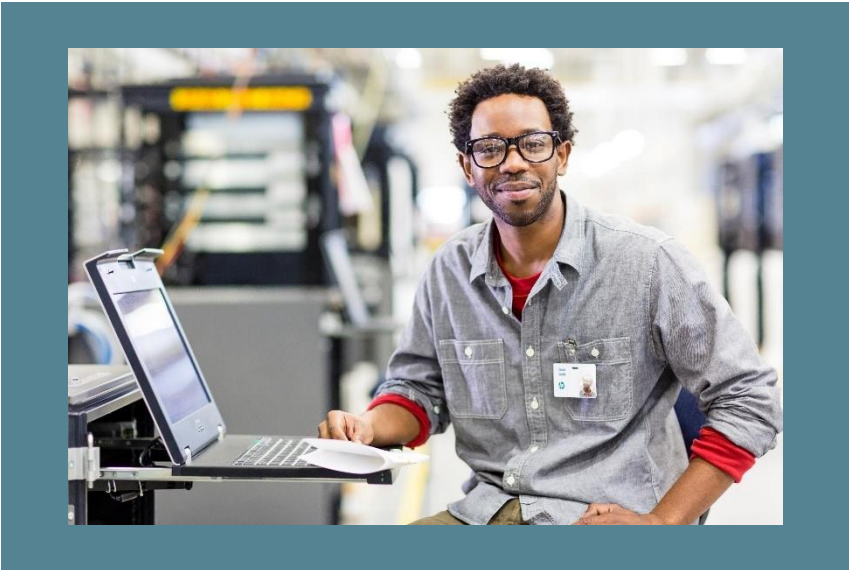
Meet or exceed industry standards—and customer expectations. We all have a responsibility to deliver an exceptional customer experience by prioritizing quality in everything we do. We only promise what we can deliver, and we deliver what we promise. We use due diligence when we select our business partners and suppliers to ensure they meet HP standards. Always remember that HP products stand for quality.

Market responsibly. We must represent our products and services fairly, accurately, and truthfully. We must not create misleading impressions in any advertising, marketing, or sales materials, or in any presentations, and we must not make false or illegal claims about competitors or their products and services. We protect the HP brand and marks and use them only with the proper authorization.

Do not grey market. We must use due diligence to prevent situations that may lead to the grey marketing of HP products. This includes complying with [HP policies](#) on end user customer verification.

What are “grey markets”?

Grey markets are created when HP products are made available for sale outside normal distribution channels and/or shipped across international borders in violation of channel partner/reseller contract terms and conditions. In some parts of the world, grey marketing is referred to as “leakage.”





Learn more

Policies

- [End User Verification Policy](#)
- [HP WW Quality Policy and Manual](#)

Resources

- [Corporate Sales and Marketing Resource Center](#)
- [Front-End End User Verification \(FE EUV\) Guidelines](#)



Integrity in action

I received a large order from an HP partner, and the partner has requested a significant discount. However, the partner has refused to provide customer contact details. I know the partner has placed orders for this customer in the past. Do I need to verify the end customer on this occasion?

Yes. To ensure that HP products do not end up in the grey market, HP policies require verification that there is a legitimate end user for discounted deals and that the end user has a need for the quantity of the product listed on the order.

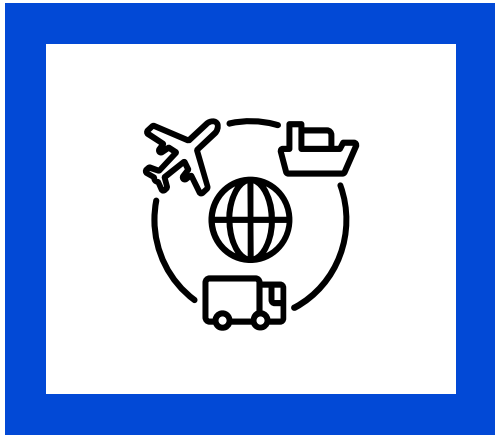


Know the rules about importing and exporting

Comply with applicable international trade laws.

Stay informed. As a global company, we must comply with all international trade laws and regulations to protect our ability to buy, sell, and trade goods and services in countries around the world. Abiding by global trade laws and regulations enables us to obtain and retain the government authorizations required to trade our products and expedite deliveries to our customers, while preventing financial and criminal penalties for noncompliance.

Beware of requests to participate in boycotts. Boycott requests can appear in contract language, shipping documents, or in routine business communications. You must not respond to trade-related boycott requests unless you have received guidance, as required by HP trade compliance policies.



Follow our processes. Operating a multinational corporation requires all of us to know and abide by all international trade laws and regulations and HP’s trade compliance policies. Across the company, we must:

- Remember that all HP products and services marketed by HP—along with the related technical information—must be reviewed and assigned the appropriate import and export classifications by the Trade Compliance team prior to marketing, extending offers, or entering into agreements to sell, import, export, or transfer.
- Understand that all customers, partners, and business transactions must be screened to confirm that we do not engage in unauthorized transactions with sanctioned parties or countries subject to trade embargoes. This will prevent our products from being used for activities such as military end uses without the appropriate authorizations.
- Understand that all products shipping internationally must be marked with an accurate Country of Origin. The Country of Origin designation informs consumers where a product is made (a determination which may involve legal analysis), and is used by customs authorities to determine duty rates, eligibility for preferential trade agreements or government procurement programs, trade sanctions, and import quotas.

Rely on HP Trade Compliance

This team helps our businesses and functions successfully learn, implement, update, and comply with the necessary global trade programs for each organization within our company and in each country where HP does business. Ask our trade compliance experts about any issues related to the international trade of goods, services, and technology. This ensures that the appropriate internal controls are implemented in the organization and documented in our business processes and procedures. All questions or noncompliance concerns should be immediately escalated to the Trade Compliance team.



Learn more

Policies	Resources
<ul style="list-style-type: none">• Trade compliance policies	<ul style="list-style-type: none">• HP Trade Compliance webpage



Our impact

- Minimize our environmental footprint
- Make a difference

Minimize our environmental footprint

Take urgent and decisive action to achieve net zero carbon emissions across our entire value chain, give back more to forests than we take, and innovate our products and services for a more circular economy.

Embed sustainability into our business. We conduct business in a way that is environmentally responsible and complies with environmental laws, regulations, and standards. We are constantly reinventing how our products are designed, manufactured, and delivered to increase energy and material efficiency, promote reuse and recycling practices, and avoid materials of concern. We embed waste reduction and material recycling into our operations, and we ensure the safe disposal of hazardous materials in our communities.

Hold our supply chain accountable. Our production and nonproduction suppliers are essential partners as we work to drive net zero carbon and improved resource efficiency throughout the value chain. We comply with the terms of environmental permits and authorizations, and we are proactive in making sure our suppliers do the same. All contracted HP suppliers are subject to environmental requirements in HP’s [Supplier Code of Conduct](#) and HP’s [General Specification for the Environment](#).

Do your part. Consider setting a Sustainable Impact goal as part of your annual goal setting process and explore how you can contribute to HP’s sustainability efforts through your job role. This could be through product design, efficient use of resources, sales, participation in HP site or community volunteer activities, and more.





Learn more

Policies

- [HP Corporate Real Estate and Workplace Services \(CREWS\) Resource Conservation Policy](#)
- [HP Environmental, Health and Safety Policy](#)
- [HP General Specification for the Environment](#)
- [HP Materials and Chemical Management Policy](#)
- [HP Supplier Code of Conduct](#)
- [HP Supply Chain Social and Environmental Responsibility Policy](#)
- [HP Sustainable Paper and Wood Policy](#)

Resources

- [Sustainable Impact at HP](#)
- [Sustainable Impact Sales Resources Site](#)

Make a difference

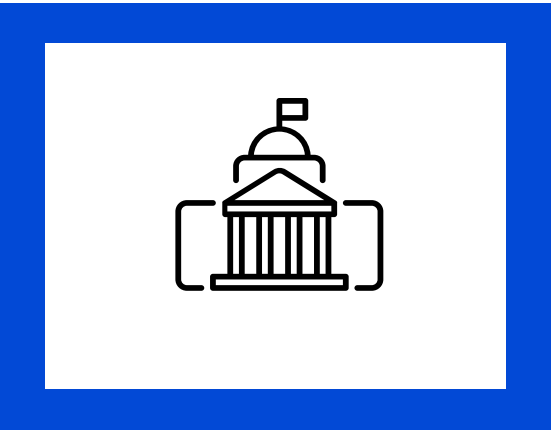
Work in ways that are good for us and the world.

Volunteer responsibly. You are encouraged to take an active role in making a positive impact in your community. However, it’s important that you do not use HP’s resources for any political or charitable contributions without prior approval.

Contribute responsibly. We encourage you to make personal contributions to causes and organizations you support, and we want everyone to feel comfortable with their choices. Do not pressure or solicit employees, business partners, or customers to contribute to or join your preferred charities, groups, or political activities.

Know our policies surrounding donations and sponsorships. HP supports strategic investments designed to address social needs in our communities and advance HP business and market interests. There are processes and controls in place to ensure company giving reflects HP’s core values and business interests, while properly classifying these investments. For example, nonprofit organizations often use the terms “donation” and “sponsorship” interchangeably when approaching HP for financial support. However, there are legal and financial differences that impact the ways in which we can engage with nonprofits, and they are guided by distinct policies and processes. Please consult our policies for more information.

Follow the rules on political participation and lobbying. If you engage in civic activities or share political views, do not use HP’s time, and make it clear that your perspective is your own. Any contact made by HP employees with government personnel intended to influence legislation, policies, or government action may be considered lobbying, including submissions in response to government requests for comments on public policy matters. All HP employees must obtain prior approval from HP Government Affairs & Public Policy to lobby or to authorize anyone else—like a consultant, agent, trade association, or HP Business Partner—to lobby on HP’s behalf.





Learn more

Policies

- [Conflicts of Interest Policy](#)
- [Global Volunteerism Policy](#)
- [HP Global Charitable Contributions Policy](#)
- [HP Sponsorship Policy](#)
- [Political Participation Policy](#)



Integrity in action

I would like to make a donation to my local non-profit. Can I make the donation with my HP-sponsored credit card?

Only with prior authorization. HP employees are encouraged to actively engage in their communities to make a positive impact. However, HP resources cannot be used for charitable or political contributions without prior approval.



Waivers and updates to Integrity at HP

Integrity at HP is HP’s code of conduct.

HP understands and respects your rights as an employee. Keep in mind that nothing in Integrity at HP is intended to interfere with any legal right you may have to speak publicly about matters of public or workplace concern, or to engage in collective activities that are protected under local labor law. This includes protected activity concerning wages, hours, and other terms and conditions of your employment.

Integrity at HP will be disclosed to shareholders and made available on the HP website. HP is committed to keep Integrity at HP up to date and may periodically make updates as needed. The provisions of Integrity at HP are in addition to, and do not modify, replace, or supersede HP’s other policies or procedures.

Only our Chief Legal Officer may grant exceptions or waivers to this document for employees and non-executive officers. The Board of Directors must approve any waivers for director or executive officers and must properly disclose such waivers to the public.

