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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. I have always believed that how we do things is just as important as what we do.

We must never lose sight of the values and culture that have made us the company we are today. It's important that we take time to reflect on our values, and learn how to apply them in an increasingly complex world.

Each and every one of us are stewards of the HP brand – and have an important role to play. Thank you for everything you are doing to enable our success.

If we continue to lead with integrity and live up to the values, there is nothing we can't achieve.

Enrique Lores
President & CEO



Ethical Leadership

HP is a company grounded in integrity, trust, and honesty. How we do things is as important as what we do. Our commitment to an ethical culture is demonstrated by our multi-year recognition as one of the World's Most Ethical Companies® by the Ethisphere Institute. This honor validates that the HP Way is lived out through our commitment to people, planet, and the community.

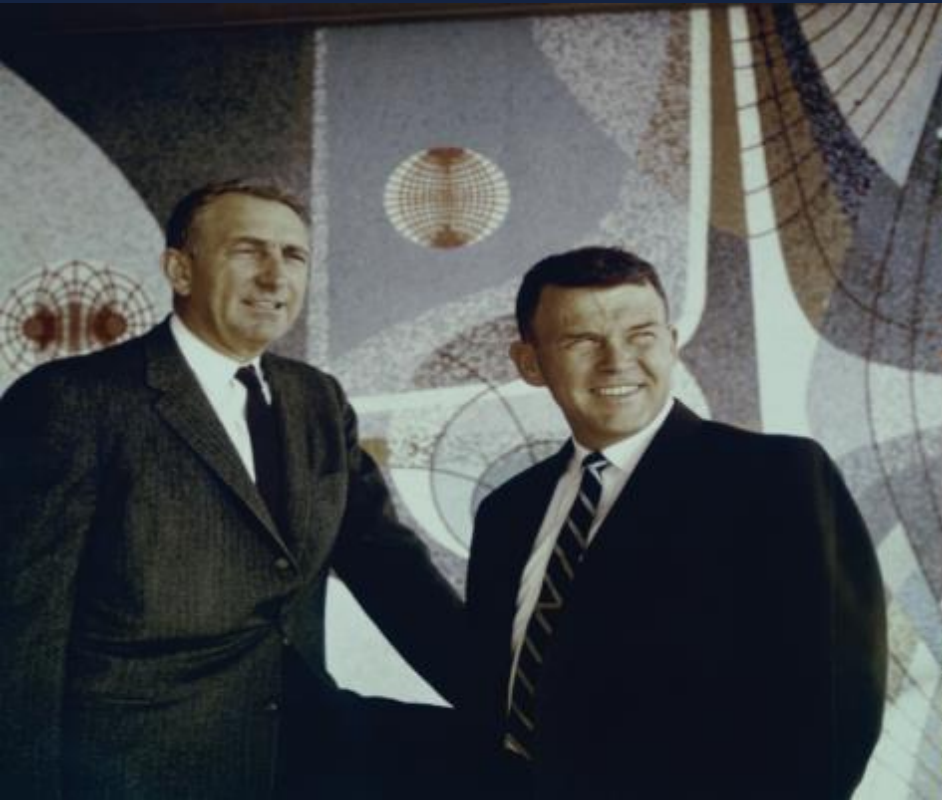
Integrity at HP is our code of conduct that provides us with the guidance and confidence we need to make the right choices, no matter our role or where we are in the world. If you need more guidance after reading our code of conduct, please reach out to the Ethics and Compliance Office using one of the many avenues provided.

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

Cynthia Bright
Chief Ethics & Compliance Officer



Our Culture



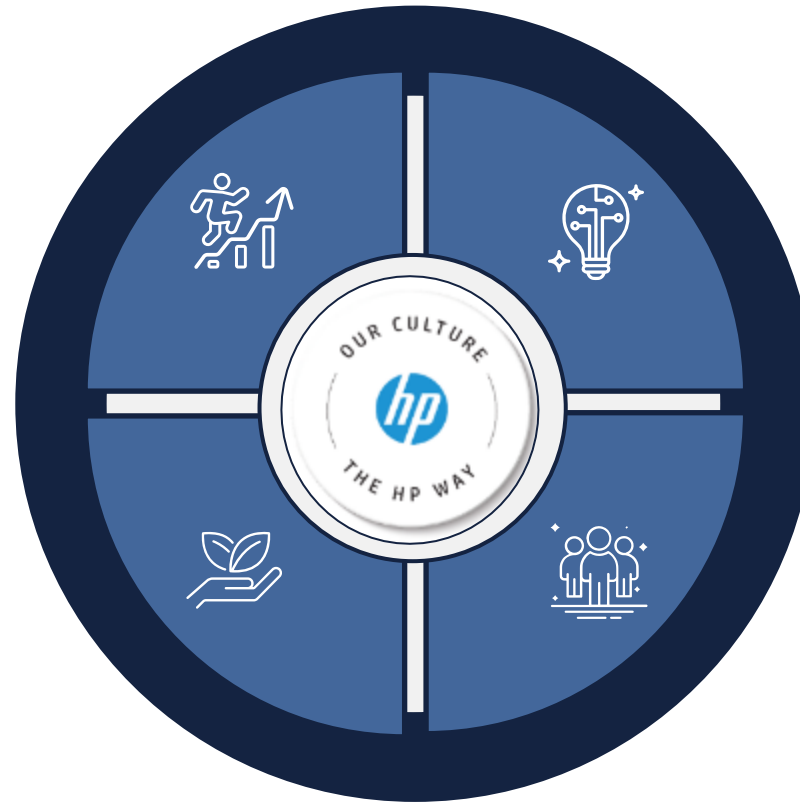
The HP Way

We lead with ambition and agility

Defy the status quo
Move fast, learn, adapt
Innovate with impact

We win with purpose and integrity

Act with uncompromising ethics
Strengthen communities and human rights
Advance equity and sustainability



We focus on customers first

Seek insights
Solve big problems
Deliver on commitments

We grow together

Champion diversity and inclusion
Collaborate for best results
Have brave conversations

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:

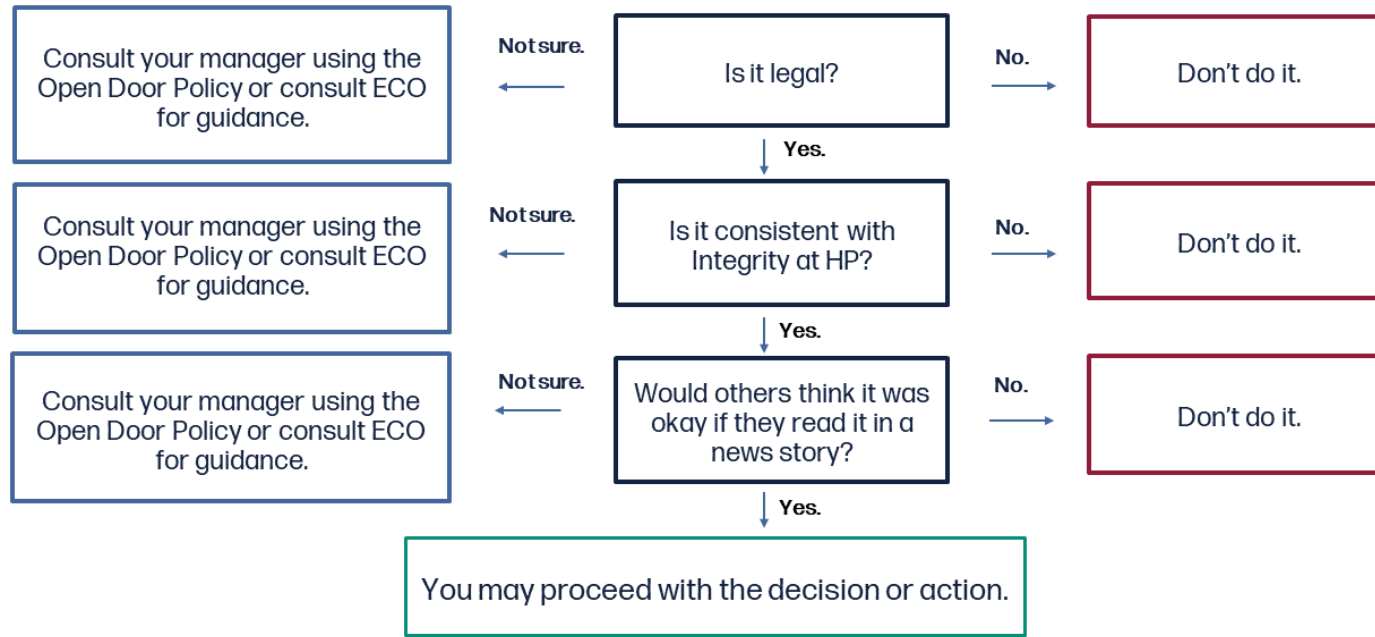
- **Be an ethical leader:** use your good judgment and the Headline Test to ensure your actions demonstrate the highest standards of ethical behavior.
- **Be a resource:** know Integrity at HP values and expectations so you can reinforce them with your team and answer employee questions.
- **Open your 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 and ask for help 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.

Act with integrity

The Headline Test

The Headline Test is a simple but powerful tool designed to ensure we appropriately consider the soundness and impact of our business decisions.

Unsure about a decision or action? Use the Headline Test.



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.

Win the right way

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

Maintain high standards. 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 misconduct reportable to a government agency. All of us have a responsibility to do our part to protect our reputation and our company.

Take action when aware of misconduct. Every employee is expected to report any alleged misconduct immediately. Use the Open Door Policy to raise concerns – managers must encourage open and honest communication.

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

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.
- 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 not alter or destroy records in response to litigation, investigations, or audits.

How to raise a concern

At HP, we believe everyone's voice should be heard. It is important that you know there are resources available if you have a question or concern. 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 ways to 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.

Our Promise



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*. Our goal is to create positive impacts for people, society, and business, while mitigating risk and preventing harm. To accomplish this, we must prioritize communication, clarity, and accountability across HP.

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 see retaliation happen to someone else, report to your manager or to another [internal resource](#). HP promptly investigates allegations and will take action when appropriate to remedy any adverse impact on someone's rights.

Live up to our values. We carry out human rights due diligence across our business to identify, investigate, prevent, and mitigate adverse human rights impacts. This includes impacts that we may cause or contribute to through our own activities, or those which may be directly linked to our operations, products or services by our business relationships. We engage and collaborate with individuals and stakeholders to develop, implement, and monitor our approach. We also require our partners and suppliers to uphold respect for human rights through our programs and contracts.

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 the principles concerning fundamental rights set out in the International Labour Organization's Declaration on Fundamental Principles and Rights at Work.

Examples of key human rights:

- Favorable working conditions
- Fair and equitable treatment
- Nondiscrimination
- Rest and leisure (working hours)
- Privacy
- Freedom from modern slavery

Enable trust

Maintain an environment with trusted digital experiences and data practices

As an HP employee, you are committed to following HP's corporate privacy compliance framework. 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**” 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



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.

Embrace our diversity. HP values diversity, equity and 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. Practice equal opportunity in every action and embrace the diversity of all HP employees. As stated in HP's policies, do not discriminate against any employee or applicant based on 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.

Promote trust and respect. Promote and encourage an inclusive work environment, free of harassment. Do 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.

Respect others

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



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 contacting the [Ethics and Compliance Office](#).

Our Company



Promote a safe HP

Put the safety and security of people first.

Prevent safety risks. Comply with safety, health, and security policies and procedures. Be proactive in preserving your safety and the safety of those around you. Do 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, is authorized to have 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)

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 phones and computers – from theft, loss, damage, and waste. Never use HP assets to promote your personal 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](#).

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

- Label it properly
- Use it only for business purposes
- Share it only with those who have a legitimate business need, is an authorized party, and/or have a signed [Confidential Disclosure Agreement](#) (CDA)
- Properly store sensitive information and dispose of it appropriately when no longer needed
- Encrypt sensitive information and protect it with role-based access controls

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.

Protect our assets

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.

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

Protect our assets

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 sources



Integrity in action

As part of my responsibilities at HP, I have been doing research and have results that I want to share or publish in a technical journal. The results may be useful in improving HP products and are not publicly known. Is it OK to post the results publicly or submit the results to a journal as part of a research paper?

No. Since the results of the research are not publicly known, the information would be considered HP Confidential Information under HP's Confidential Information Policy. In addition, because these results have value, they may also be considered a trade secret. Additionally, if you have invented patentable technology, the rights for HP to secure a patent may be destroyed by disclosing the invention.

Keep accurate records

Make business decisions based on complete and accurate information.

Insist on accurate business records.* Accurate records are essential to how we manage our business, 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.

Ensure the financial policies and reporting guidelines in the Accounting and Finance Manual are followed. Obtain approvals where required and be prepared to provide supporting documentation.

*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 time sheets, purchase orders, invoices, expense reports, emails, and regulatory filings.

Keep accurate records

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, or unrecorded funds. Raise a concern about any unusual activity immediately. Employees who have questions about records should contact the Records Information Management team or their department's Records Coordinator or Records Officer.

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.
- Sales targets can be unfairly rewarded: for example, when a surplus of goods develops, the value of goods is actually reduced.

What are the potential consequences for HP?

- Channel stuffing leads to inaccurate records.
- Channel stuffing undermines trust in the company brand, which encourages partners and customers to shift toward competitors.

Keep accurate records

Preserve materials subject to legal hold. Do not delete or destroy any records or materials that are subject to a legal hold or relate to ongoing litigation, investigation, or audit. 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.



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 [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. 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. Familiarize yourself with the HP Insider Trading Policy. Even exercising employee stock options may be considered a “trade,” so follow the rules about quarterly trading restrictions and windows. Contact insidertrading.compliance@hp.com if you have questions.

Do not trade on material non-public information

Inside information includes information such as:

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



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 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 regarding the use of social media. You must make it clear on your social media that your views are your own. 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

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 you are unsure, discuss the situation with your manager and consult HP's Conflicts of Interest Policy.

How can potential conflicts of interest arise?

- Outside employment – 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
- Service on a board of directors or as advisor of an organization

Avoid conflicts of interest

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 but may also include other relationships as well, particularly financial relationships such as partners in ownership of a business or property.



Integrity in action

I am planning to start a side business, marketing a product that I developed on my own time. Are there any conflict of interest concerns with this?

It depends on the nature of the product. If it does not compete with what HP sells and you do not use HP's time, resources, or business relationships in support of your business, it is likely OK. The best strategy is to review the HP Conflicts of Interest Policy, disclose your plans with your manager, and obtain approval in writing, if needed. And remember, any outside pursuit should not interfere with the time, talent, or passion you bring to your work at HP.

Engage responsible third parties

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

Source responsibly. We must ensure that our partners share our commitment to conducting business with integrity. HP's third parties should uphold our high standards in ethics, human rights, diversity, management, health, safety, and the environment. Our partners and suppliers must meet our quality, delivery, service, and pricing standards.

Communicate our expectations. We all must comply with HP's Global Procurement Policy and all applicable onboarding processes when we engage with third parties. All contracts with third parties must be in writing and clearly describe their obligations and ours. We have a responsibility to monitor contractual arrangements and promote compliance with the law and our policies. Report any HP policy violation concerns by business partners or suppliers and terminate contracts with partners who fail to address violations of our standards.

Third parties include: vendors, suppliers, consultants, contractors, contingent workers, an agent, or any third party doing business on behalf of HP.



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. Regardless of local practice or the practices of other companies, we never engage in corrupt behavior and we avoid even the appearance of impropriety.

Maintain integrity at all costs. Never offer or give anything of value to win or retain business, or to secure an improper advantage – even if it means losing business. Offers of anything of value to win business are considered bribery. Never offer money or something of value to a third party in exchange for something else, such as a discount, favor, or preferential treatment. This is considered a kickback. We never offer or receive bribes and do not permit kickbacks.

Do not make facilitation payments. A facilitation payment is a small payment of cash or something of value made to a government official to secure or speed up the performance of a routine government action. Any requests for a facilitation payment or any facilitation payments made under duress must be reported immediately.

Speak up. Report any request for – or offer of – a bribe or kickback to your manager, Legal, or the Ethics and Compliance Office.

Monitor third parties. We are responsible for the actions of third parties that conduct business on behalf of HP. When you hire third parties, follow approved onboarding processes, set clear expectations, and actively manage their work. Ensure our discounts, rebates, commissions, or other HP funds – such as Market Development Funds – will not be used as bribes on our behalf. You may not use third parties to take actions that we cannot otherwise take ourselves. Also, do not ignore "red flags" that indicate a third party may be making illegal payments or engage in corrupt 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.

Never bribe or participate in kickbacks

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.



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 detailed 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. Give and receive gifts, meals, travel, and entertainment only if it complies with the HP Global Business Amenities Policy. We should avoid even the appearance of a business decision being influenced by what we gave or received.

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

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 – as required by HP policy – for any gifts, meals, entertainment, or travel. Requests for reimbursement must follow HP's employee expense management process. Gifts, meals, entertainment, and travel submitted for reimbursement must be accurately classified and include all required information, including attendees.

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

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.

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



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 avoid any conduct that could restrict fair trade.

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

Antitrust laws govern HP's interactions with:

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

Avoid improper agreements. 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. An improper agreement can be inferred from the behavior of two parties – it does not need to be specifically expressed.

What's an "improper agreement?"

It can be:

- An informal understanding
- Verbal, not written
- Nonverbal (e.g., a wink/nod)
- Inferred behavior (disclosing future market conduct, influencing the conduct of competitors, or exchanging views on competitively sensitive subjects)
- Silence, followed by subsequent parallel action
- Accomplished through a third party, such as common customer

Compete fairly

Bid fairly. Bid rigging happens when competitors manipulate bidding to limit competition. It can include comparing bids, agreeing not to bid, or agreeing 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. 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 the confidential information of our former employers and to honor any disclosure limitations of which you may be subject. Do not use or share any confidential information from a former employer with HP. Also, it's important that you do not hide your identity or ties to HP when gathering information.

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

Compete fairly

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



Integrity in action

I was at an industry conference and during a lunch break, a group of competitors started sharing pricing information to level the playing field for everyone participating in an upcoming bid for ABC Corporation. I did not participate in the conversation, 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. In addition, if you heard competitors' pricing information, you should not participate in HP's bid for business with ABC Corporation.

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.

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.”



Integrity in action

I received a large order from an HP partner, and the partner has requested a large discount. Since I have done business with this partner many times, do I have to verify the end user?

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 laws as they relate to international trade.

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 develop our products and expedite deliveries to our customers, while preventing financial and criminal penalties for noncompliance.

Beware of requests to participate in boycotts. Obtain and maintain the appropriate import, export, and customs documentation and records. Respond to trade-related boycott requests only as permitted by HP Global Trade Policies.

Comply with immigration laws. You have a responsibility to obtain proper authorizations (including work permits and visas) for any countries in which you work on behalf of HP.

Follow our processes. Operating a multinational corporation requires all of us to know and abide by HP's Global Trade Policies. Across the company, we must:

- Conduct the necessary due diligence to ensure that our products are not used for sanctioned activities, such as nuclear proliferation or prohibited weapons development.
- Remember that every product and service marketed by HP – along with the related technical information – must be reviewed and assigned the appropriate import and export classifications by the Global Trade team prior to the transaction.
- 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.

Rely on HP Global Trade. 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 Global Trade 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 Global Trade team.

Our Impact



Minimize our environmental footprint

Drive toward a net zero carbon and fully regenerative economy while creating the industry's most sustainable portfolio of products and solutions.

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 environmentally-concerning materials. We also support waste reduction, material recycling, and the safe disposal of hazardous materials in our communities.

Hold our supply chain accountable. Our suppliers are essential partners in improving HP's carbon, energy, water, and waste footprint. We comply with the terms of environmental permits and authorizations, and we are proactive in making sure our suppliers do the same.

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.

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 difference 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.

Make a difference

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.



Integrity in action

I've been asked to host a local town hall event where candidates will answer questions about community issues. Is it okay in my introduction to share with the audience where I work and what I do?

This might be okay. Reach out to Government Affairs & Public Policy in advance, and if approved, make sure your participation in the event complies with our policies.

Policies

Our Culture

- [Global Open Door Policy](#)
- [Global Best Work Environment Policy](#)
- [Litigation and Investigations Policy](#)

Our Promise

- [HP Human Rights Policy](#)
- [HP Supplier Code of Conduct](#)
- [HP Global Master Privacy Policy](#)
- [HP Binding Corporate Rules](#)
- [HP Global Employee Privacy Policy & Notice](#)
- [HP Personal Data Retention Policy](#)
- [Global Best Work Environment Policy](#)
- [Global Open Door Policy](#)

Our Company

- [HP Cybersecurity policies, standards, and specifications](#)
- [HP Environmental, Health and Safety Policy](#)
- [HP Security Policy](#)
- [Global Best Work Environment Policy](#)
- [Confidential Information Policy](#)
- [Conflicts of Interest Policy](#)
- [Global Social Media Governance Policy](#)
- [Accounting and Finance Manual](#)
- [HP Global Master Records and Information Management Policy](#)
- [Litigation and Investigations Policy](#)
- [HP Insider Trading Policy](#)
- [HP Instant Messaging Policy](#)

Our Impact

- [HP Environmental, Health and Safety Policy](#)
- [HP General Specification for the Environment](#)
- [Global Volunteerism Policy](#)
- [Conflicts of Interest Policy](#)
- [HP Global Charitable Contributions Policy](#)
- [Political Participation Policy](#)
- [HP Sponsorship Policy](#)

Our Relationships

- [Conflicts of Interest Policy](#)
- [Anti-Corruption Policy](#)
- [Anti-Corruption FAQs](#)
- [Global Procurement Policy](#)
- [Sustainable Impact and Human Rights Policy](#)
- [Partner Legal and Regulatory Compliance Policy](#)
- [Partner Code of Conduct](#)
- [Supplier Code of Conduct](#)
- [Contingent Worker Code of Conduct](#)
- [Global Business Amenities Policy](#)
- [Global Business Amenities FAQs](#)
- [U.S. Business Amenities Policy](#)
- [Conflicts of Interest Policy](#)
- [Confidential Information Policy](#)
- [End User Verification Policy](#)
- [HP Global Trade webpage](#)

Resources

Our Culture

- [HP Culture webpage](#)
- [Raise a concern infographic](#)
- [Anti-retaliation infographic](#)
- [“Take the First Step” video](#)
- [Speak Up Listen Up – Module 1: Our Open Door Policy](#)
- [Speak Up Listen Up – Module 2: Communicating With Your Employees](#)
- [Integrity Investigations FAQs](#)
- [How to Report a Concern webpage](#)

Our Promise

- [Sustainable Impact @HP](#)
- [Report concerns](#)
- [HP Privacy Statement](#)
- [HP Job Applicant Privacy Notice](#)
- [HP Privacy Rulebook](#)
- [Privacy principles video](#)
- [Report privacy incidents](#)
- [“Don’t Stand By” video](#)

Our Company

- [HP Cybersecurity home page](#)
- [Report information security incidents](#)
- [IT knowledgebase](#)
- [Protect Sensitive Company Data](#)
- [Preventing/Reporting Phishing and Ransomware Attacks](#)
- [Working from Home – Cybersecurity guidance](#)
- [Matrix For Handling and Managing the Company’s Information Assets](#)
- [CDA Portal](#)
- [Conflicts of interest infographic](#)
- [Side agreements infographic](#)
- [Corporate AMEX card usage infographic](#)

Our Relationships

- [Conflicts of interest infographic](#)
- [Anti-Corruption Red Flags](#)
- [HP Amenities Approval Tool](#)
- [Employee Reimbursement Hub](#)
- [Corporate Sales and Marketing Resource Center](#)

Our Impact

- [HP Sustainable Impact webpage](#)
- [HP Sustainable Impact Sales and Marketing Resources](#)

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.