



# Integrity at HP





## Integrity at HP

### A Message from our CEO

### Our Promise

- 9 What we value
- 11 Using Integrity at HP
- 13 How to raise a concern

### Our People

- 17 Build trust
- 19 Respect others
- 21 Promote a safe HP
- 23 Protect personal data

## Our Company

- 27 Protect our assets
- 29 Keep accurate records
- 31 Avoid conflicts of interest
- 33 Do not trade on material non-public information

## Our Relationships

- 37 Engage responsible business partners
- 39 Never bribe or accept kickbacks
- 41 Know the rules about gifts and entertainment
- 43 Compete fairly
- 45 Putting customers first
- 47 Know the rules about importing and exporting
- 49 Speaking on behalf of HP

## Our Impact

- 53 Respect human rights
- 54 Reduce our environmental footprint
- 55 Make a difference

## Closing Thoughts from Chris Kloes

## Our Resources



# A Message from Our CEO

At HP, we imagine the future and make it happen. Our conduct is the core of our culture, founded on shared values that are as relevant today as when HP was established back in 1939.

Integrity at HP guides us on how to win the right way, how to protect and strengthen our reputation, and how to sustain our success for the long term.

Every decision we make matters in our effort to deliver meaningful contributions. We are all accountable for our actions, responsible for their consequences. By living our values, we are building a culture based on trust and respect, and solving tough challenges with integrity—all with a vision to make life better, for everyone, everywhere.

CEO





## Our Promise

- 9 What we value
- 11 Using Integrity at HP
- 13 How to raise a concern

# What we value

The HP Way includes three components, each equally important.

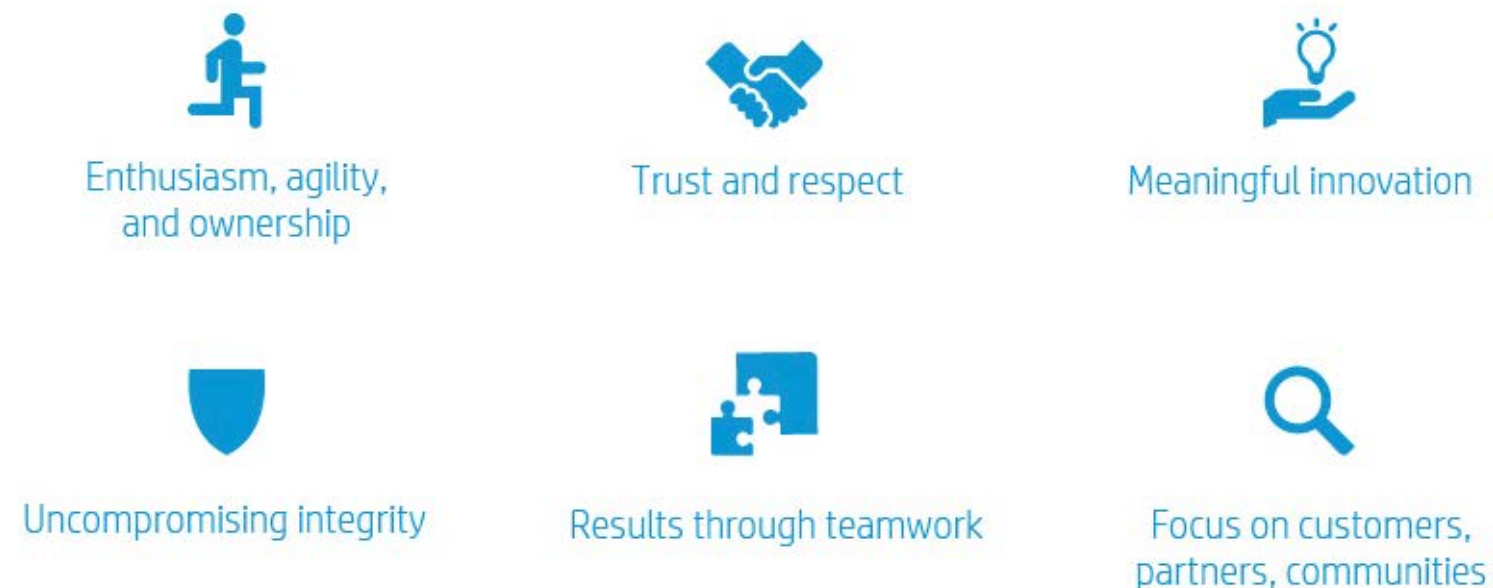
- **What we value:** Our values reflect the high standards to which we hold ourselves.
- **How we work:** These fundamentals sum up what differentiates how we work at HP.
- **How we lead:** Our leadership principles and practices describe how everyone at HP has the opportunity, and the responsibility, to be a leader.

## Our culture: The HP Way



## What we value

The HP Way is led by our shared values. Much like our drive to reinvent, these values have stood the test of time.



The “what” and the “how” are familiar concepts to HP employees. That is because how we do things here is as important as what we do, a belief that is reinforced throughout this document, just as it is in our day-to-day lives at HP.

# Using Integrity at HP

Integrity at HP is a resource for all employees and members of the Board of Directors. Integrity at HP is the new name for the Standards of Business Conduct. It represents the highest level of guidance for our conduct.

## 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 has a responsibility to report any suspected misconduct immediately, and honestly.

**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 that 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.

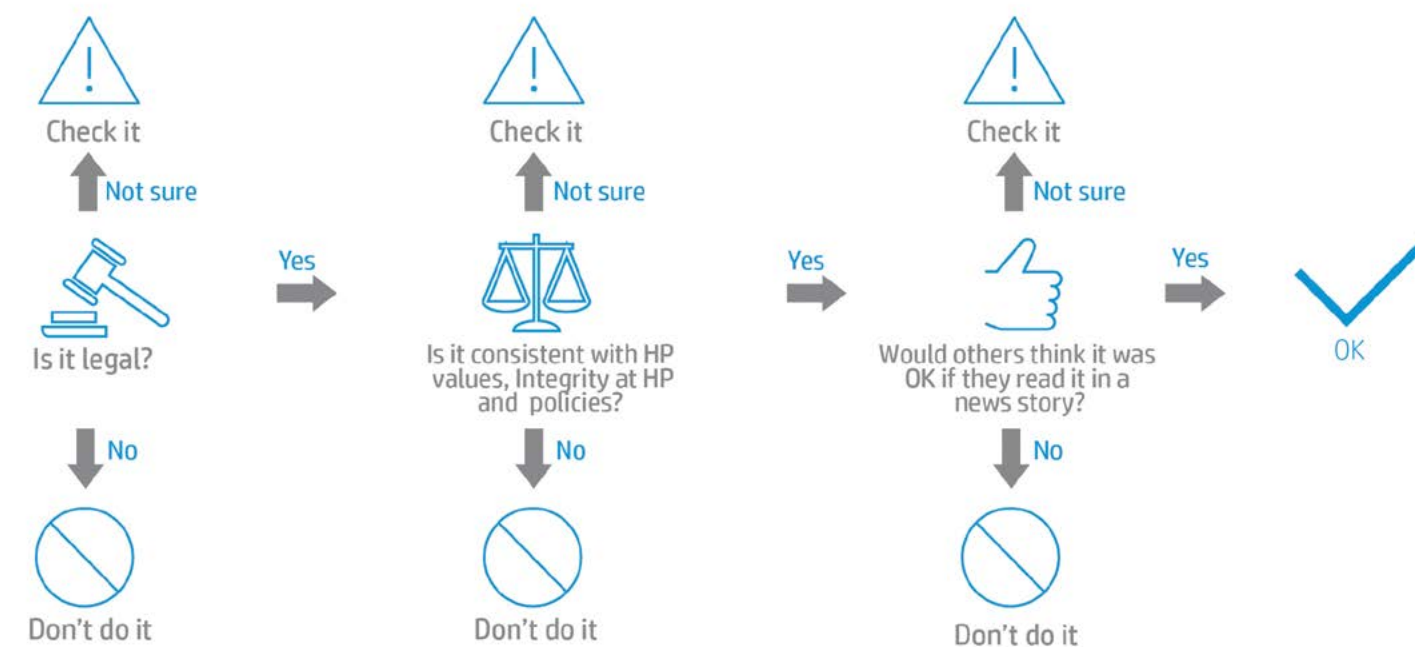
**Open your door**—Encourage employees to come to you if they want to talk or have questions.

**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 someone who comes forward with a concern.

## Applying the Headline Test

The Headline Test is a simple but powerful tool designed to make sure we appropriately consider the soundness and impact of our business decisions. It is named after one of the tools most commonly used by executives.



Before you make a decision, consider how it would look in a news story. If needed, check it with an [internal resource](#).

## Act with integrity

**Q:** 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?

**A:** No, you should not. Nobody at any level of HP has the authority to direct you to do something that violates our policies or the law. Before you act, check Integrity at HP. If the action seems wrong, let your manager know you cannot do it and why. If she insists, or if you are uncomfortable approaching her directly, share your concerns with another member of management or another [internal resource](#) right away.

# How to raise a concern

At HP, we believe everyone's voice should be heard.

It is also 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 required 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 manager](#)
- [Human Resources](#)
- [Global Legal Affairs](#)
- [Your local Integrity at HP team](#)
- [Your business group or region 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 [available here](#).

- **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.



## Find Out More

[HP Global HR Policies](#)

[HP Global Open Door Policy](#)

[HP Litigation and Investigations Policy](#)



## Our People

- 17 Build trust
- 19 Respect others
- 21 Promote a safe HP
- 23 Protect personal data



# Build trust

## What We Do

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

## How We Do It

**Maintain high standards.** When someone violates Integrity at HP, our other policies, or the law, it can result in disciplinary action, up to and including termination. Certain violations can have additional consequences under the law. 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 has a responsibility to report any alleged misconduct immediately. Use the HP 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 question honestly. 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 under the law. Everyone who works at HP has a responsibility to:

- Participate fully and honestly with investigations and audits
- Cooperate with Global Legal Affairs to respond to litigation or requests from government and other external agencies
- Never act in any manner that would impede an investigation, including destroying or fabricating evidence, intimidating witnesses, or improperly discussing the investigation or disclosing information in a manner that impedes a fair review
- Retain and do not alter or destroy records in response to litigation, investigations, or audits



# Respect others

## What We Do

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

## How We Do It

**Embrace our diversity.** HP values differences—whether 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 that results from 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 set out in our policies, do not discriminate against any employee or applicant.

**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 has zero tolerance for 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.

### Watch Out For ...

- Critical or dismissive comments about our harassment policies
- The perception of harassers as victims or victims as complainers
- Threats or name-calling
- Jokes or comments that are sexual or offensive



## Act with integrity

**Q:** 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 does not want to report it. Should I respect her wishes?

**A:** Not in this case. Despite what your colleague says, she is experiencing harassment under HP’s policies. This behavior is not tolerated at HP. Speak up about this situation immediately by calling the telephone line or reaching out to the [Ethics and Compliance Office](#).

## Find Out More

- HP Global HR Policies
- HP Global Non-Discrimination Policy
- HP Global Harassment-Free Work Environment Policy
- HP Litigation and Investigations Policy

# Promote a safe HP



## What We Do

Put the safety and security of people first.

## How We Do It

**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 alert to what is going on around you. Immediately contact your manager about any situation that could jeopardize safety at HP.

**Prevent breaches of our IT systems.** Keeping our IT systems safe from inappropriate access and disclosure is the responsibility of every employee. All employees must be familiar with HP data security policies, standards, and specifications. Never provide information that can be used to access our systems to anyone unless you are sure that the recipient is who they claim to be, is authorized to have access, and has a valid need for the information.

## Find Out More

[HP Environmental, Health and Safety Policy](#)

[HP Security Policy](#)

[HP Global Cybersecurity Policies](#)

Help to prevent viruses and breaches of our IT systems. Follow our policies as well as:

- Protect your password(s)
- Secure your workstation when you step away
- Use only hardware and software provided by HP
- Never download or install unauthorized applications or storage devices
- Never access our network via unauthorized applications
- Be alert to phishing scams, and do not open suspicious links in emails, even if you know the source

## Report cybersecurity incidents

- Report an IT security event, incident, or crisis
- Immediately forward any suspicious emails as an attachment to the HP Security Operations Center at [phish@hp.com](mailto:phish@hp.com)



# Protect personal data

## What We Do

Recognize and honor our obligations.

## How We Do It

Respect the privacy of personal data. We demonstrate through words and actions that we respect the privacy of personal data that is shared with us by our employees and customers. Follow our policies and all applicable laws in collecting, accessing, using, storing, sharing, and disposing of personal data. Be transparent about our practices and provide choice to individuals regarding their privacy preferences. Use personal information only for legitimate HP business purposes.

Know what types of data are personal. Personal data is anything that could be used to identify someone, either directly or indirectly, such as a name, email address, phone number, or credit card number. Sensitive personal data includes racial or ethnic origin, political opinions, religious or philosophical beliefs, sexual orientation, genetic data, or biometric data.

### Watch Out For ...

- Sharing more personal data than is needed for business purposes
- “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 preferences



## What are some examples of personal data?

- Contact details (name, email address, phone number, postal address)
- Government ID number
- Location data (GPS, IP address)
- Serial number



## Act with Integrity

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



## Find Out More

HP Global Master Privacy Policy



## Our Company

- 27 Protect our assets
- 29 Keep accurate records
- 31 Avoid conflicts of interest
- 33 Do not trade on material non-public information

# Protect our assets



## What We Do

Preserve our competitive advantage in the marketplace.

## How We Do It

**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 them to promote your personal interests or allow other people, including 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 in your use of HP hardware, software, voicemail, and email. Keep personal use to a minimum and never use our systems to violate the law or to create, store, or send content that others might find offensive.



## What is “intellectual property?”

It includes:

- Trade secrets and trademarks
- Patents
- Copyrights
- Business plans
- Engineering ideas
- Customer lists

### Safeguard sensitive information.

Information about our company, products, customers, business partners, suppliers, and our processes is our most valuable asset. To protect our sensitive information, always label it properly, use only for business purposes, share only with those who have a legitimate business need, are an authorized party, and/or have a signed confidential agreement, and properly store or dispose of it.

**Safeguard intellectual property (IP).** Be proactive in protecting intellectual property from loss, theft, or accidental disclosure. Never discuss HP intellectual property on social media, share it without an appropriate non-disclosure agreement in place, or take it with you if you leave HP.

**Safeguard the HP brand.** The HP brand is our corporate identity and an integral part of our intellectual property. Each of us has a duty to protect the brand by following the brand standards.

## Find Out More

[HP Conflicts of Interest Policy](#)

[HP IT Policies](#)

[HP Brand Guidelines and Tools](#)

## Act with Integrity

**Q:** I have noticed a colleague visiting websites with explicit content. Maybe I am just too sensitive. Is it OK to visit inappropriate websites as long as you do not share them with others?

**A:** No, it is not OK. HP systems are meant for business use and should never be used to access inappropriate websites or information. Share your concerns with your manager or another [internal resource](#).

### Watch Out For ...

- Borrowing or using HP assets without approval
- Sending work emails containing sensitive information to your personal email account
- Discussions about sensitive information in public places, such as planes, elevators, and restaurants
- Using HP assets to conduct non-HP business

# Keep accurate records



## What We Do

Make business decisions based on complete and accurate information.

## How We Do It

### 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 both our customers and our stakeholders. 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. Where required, obtain approvals and be prepared to provide supporting documentation.

### 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

**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, such as: 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 either the Records Information Management team or their department's Records Coordinator or Records Officer.

**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 the subject matter of an ongoing litigation, investigation, or audit. Be sure to 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 such employees, must contact the Litigation Department prior to deleting or destroying any information.

## Act with integrity

**Q:** In compiling some 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?

**A:** You have a responsibility to be honest and accurate 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.

## Find Out More

HP Accounting and Finance Manual

HP Global Master Records and Information Management Policy

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. They can include time sheets, purchase orders, invoices, expense reports, invoices, emails, or regulatory filings.

## What are business records?

# Avoid conflicts of interest



## What We Do

Make decisions in the best interest of HP.

## How We Do It

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 as employees on behalf of HP. It is your responsibility to recognize situations that could be perceived as a conflict of interest and avoid or address them. If you are unsure, discuss the situation with your manager, and consult HP's Conflicts of Interest Policy.

Some situations involving potential conflicts of interest include:

- 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
- Family or close personal relationships within HP
- Pursuing a business opportunity for yourself that you learned about through your work at HP
- Service on a board of directors or as advisor of an organization whose interests conflict with HP

## Act with integrity

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

**A:** It depends on the nature of the product. As long as 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 to 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.

## Find Out More

[HP Conflicts of Interest Policy](#)





# Do not trade on material non-public information

**What We Do**  
Protect confidential information and never use it to make trades or tip others.

**How We Do It**  
**Know what to protect.** Material, non-public information is any information about HP or our customers or business partners that is not publicly available, but might be useful to an investor. 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 the company.

**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. 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, and contact Global Legal Affairs if you have questions.



## What could be considered “inside information?”

Information like:

- Financial earnings
- Forecasts
- New product offerings
- Business strategies
- Potential mergers, sales, or acquisitions
- Changes in management

## Act with Integrity

**Q:** 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?

**A:** 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.



## Find Out More

[HP Confidential Information Policy](#)

[HP Insider Trading Policy](#)





## Our Relationships

- 37 Engage responsible business partners
- 39 Never bribe or accept kickbacks
- 41 Know the rules about gifts and entertainment
- 43 Compete fairly
- 45 Putting customers first
- 47 Know the rules about importing and exporting
- 49 Speaking on behalf of HP

# Engage responsible business partners



## What We Do

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

## How We Do It

**Source responsibly.** We must ensure that our partners share our commitment to conducting business with integrity. HP’s business partners 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 must comply with HP’s Global Procurement Policy when engaging business partners. All contracts with business partners must be in writing and must 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 concerns about violations of our policies by business partners or suppliers, and terminate contracts with partners who fail to address violations of our standards.

## Act with integrity

**Q:** I just learned that one of our suppliers was arrested for bribing one of their customers. The allegation has not been proven, and it does not involve HP. Should I do anything?

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

## Find Out More

- [HP Global Procurement Policy](#)
- [HP Sustainability Policy](#)
- [HP Partner Code of Conduct](#)
- [HP Supplier Code of Conduct](#)
- [HP Contingent Worker Code of Conduct](#)

It could be:

- A vendor
- A supplier
- A consultant
- A contractor
- A contingent worker
- An agent or any third party doing business on behalf of HP



## Who is considered a “business partner?”

# Never bribe or accept kickbacks



## What We Do

Never give, request, or accept bribes, kickbacks, or improper payments of any sort.

## How We Do It

**Do not put yourself or HP at risk.** Report any request for—or offer of—a bribe or kickback to your manager, Global Legal Affairs, or the Ethics and Compliance Office.

**Maintain a zero-tolerance position.** Regardless of local practice or the practices of other companies, make sure you avoid even the appearance of impropriety. Never provide, offer, pay, ask for, or accept anything of value in order to win business or improperly influence a decision—even if it means losing business.

**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.

**Monitor third parties.** We are responsible for the acts of third parties conducting business on behalf of HP. When hiring third parties, ensure that you follow approved onboarding processes, set clear expectations, and actively manage their work. Guarantee our commissions or arrangement fees will not be used as bribes on our behalf. Report any requests for or offers of bribes, kickbacks, or payments of any sort to your manager, Global Legal Affairs, or the Ethics and Compliance Office.



## Can You Recognize a Bribe?

A bribe can take many forms including:

- A payment
- A gift
- A favor
- A job offer
- An offer of entertainment or travel

Even a charitable or political contribution could be considered a bribe if offered to influence a decision.

## Act with Integrity

**Q:** A long-time, trusted supplier offered me a commission in exchange for securing an annual contract with HP for his company. Is there any problem with this?

**A:** Yes, a “commission” for doing business is another word for a kickback or bribe, both of which are unethical and potentially illegal. Let the supplier know that this kind of request violates HP policy and report the incident to your manager.

## Find Out More

[HP Global Business Amenities Policies](#)

[HP Anti-Corruption Policy](#)

# Know the rules about gifts and entertainment

## What We Do

Provide and accept gifts and entertainment only when appropriate.

## How We Do It

**Comply with our policies.** Give and receive gifts, meals, travel, and entertainment only if they comply with the HP Global Business Amenities Policy. Never give the impression that a business decision was made because of something we gave or received. All gifts or entertainment must:

- Be consistent with the policies of the giver or recipient, as well as HP policies
- Be intended only to improve HP's image, better represent products and services, or foster goodwill in business

- Appear reasonable and legitimate to an outside observer
- Never be given in exchange for something in return
- Never be solicited

**Meet our obligations.** Make sure you obtain any approvals required by our policies in advance of giving or receiving, and, where required by the policy, report to your manager gifts, meals, or entertainment you receive. Be aware that the rules for what you may give to government representatives are even stricter than those in the commercial sector, and that rules for government representatives vary by country.



## 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 compromises your professional judgment is always inappropriate. Do not take a risk—always ask your manager or Global Legal Affairs if you are unsure.

### Watch Out For ...

- Lavish or excessive gifts, meals, travel, or entertainment
- Frequent giving or receiving of gifts, meals, travel, or entertainment
- Gifts of cash, gold, precious metals, gemstones, or any item or entertainment that is sexually explicit, involves gambling, or would otherwise create embarrassment for HP
- Giving or receiving gifts during a bid, deal, or contract negotiation



## Act with integrity

**Q:** An HP business partner who is bidding on work in my department has offered me his two tickets to a local sporting event because he cannot make the game. The tickets are not expensive. May I go?

**A:** No. Even if the tickets are inexpensive, accepting them would be inappropriate. Since the business partner is not attending with you, this offer is considered a gift. Because this gift was extended during a competitive bidding process, accepting the tickets could suggest to others that the business partner is trying to win your favor and therefore HP's business. You must ensure that all business decisions are made objectively and that there is not even the appearance of something improper. Refuse the offer and report the incident to your manager.



## Find Out More

[HP Conflicts of Interest Policy](#)

[HP Anti-Corruption Policy](#)

[HP Global Business Amenities Policy](#)

[HP U.S. Business Amenities Policy](#)

# Compete fairly



## What We Do

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

## How We Do It

**Honor our legacy.** At HP, we work fairly and passionately, competing based on the merits of our products and services and avoiding 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 know and follow the antitrust and competition laws in the countries where we operate.

**Avoid improper agreements.** We conduct business ethically, never entering into any agreement with a competitor, customer, supplier, or other business partner, either formally or informally, about pricing, costs or terms or conditions of sale, wages, or the division of customers, suppliers, or markets.

**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.** In talking with customers—whether in person or through our advertising, marketing, or sales materials—we 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 confidential information of former employers and to honor any disclosure limitation to which you may be subject. Do not use or share with HP any confidential information from a former employer. Do not hide your true identity or ties to HP when gathering information.

### Watch Out For ...

What's an "improper" agreement?

Avoid agreements that discuss:

- Fixing prices
- Preventing a company from entering the market
- Refusing to deal with a customer or supplier
- Limiting production, sales, or output

## Act with Integrity

**Q:** I was at an industry conference and, during a lunch break, a group of competitors started sharing pricing information in an effort 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?

**A:** You did not participate, and that 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 Global Legal Affairs. In addition, if you heard competitors' pricing information, you should not participate in HP's bid for business with ABC Corporation.

## Find Out More

[HP Marketing and Sales Policies](#)

[HP Confidential Information Policy](#)

# Putting customers first

 **What We Do**  
Insist on quality.

 **How We Do It**

Meet or exceed industry standards ... and customer expectations. We all have a responsibility to deliver an exceptional customer experience by embedding quality in everything we do. We only promise what we can deliver, and we deliver what we promise. We use due diligence when choosing a business partner or supplier to ensure that they meet HP standards. And 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 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 gray market.** We must use due diligence in preventing situations that may lead to the gray marketing of HP products. This includes complying with HP policies on end-user customer verification.

## Act with integrity

**Q:** 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 market responsibly and verify the end user?

**A:** Yes. To ensure that HP products do not end up on the gray 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.

## Find Out More

[HP End-User Customer Verification Policy](#)

[HP Confidential Information Policy](#)

[HP Quality Policy](#)

[HP Standard 014-0: Safe and Legal Products](#)

[HP Standard 014-2: Supplier Safe and Legal Products](#)



# Know the rules about importing and exporting



## What We Do

Comply with applicable laws as they relate to international trade.

## How We Do It

**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 avoiding significant financial and criminal penalties for non-compliance.

**Follow our processes.** Operating a multinational corporation requires us all to be aware of, 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 any 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

**Beware of requests to participate in boycotts.** Obtain and maintain the appropriate import, export, and customs documentation and records. Respond to requests related to trade-related boycotts 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.

## Find Out More

[HP Global Trade Policies](#)

[HP Global Employee Mobility Policy](#)

## Rely on HP Global Trade

This team is chartered with helping 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 instances of non-compliance should be immediately escalated to the Global Trade team.





# Speaking on behalf of HP



## What We Do

Allow only authorized individuals to speak for our company.

## How We Do It

**Rely on the experts.** HP has designated individuals to speak on behalf of the 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 communications from investors, analysts, and the media regarding HP business to HP Investor Relations or HP Corporate Media Relations.

**Use social media wisely.** In any online communications (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, and must make it clear that your views are your own.

In communications concerning HP, 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, and never use slurs, insults, obscenities, or other wording that might constitute a threat, intimidation, harassment, or bullying.

## Act with Integrity

**Q:** 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?

**A:** No. You should refer information about the blog to HP Corporate Media Relations at [mediarelations@hp.com](mailto:mediarelations@hp.com) and allow them to speak on HP's behalf.

## Find Out More

[HP Confidential Information Policy](#)

[HP Global Social Media Governance Policy](#)





## Our Impact

- 53 Respect human rights
- 54 Reduce our environmental footprint
- 55 Make a difference



# Respect human rights

## What We Do

Conduct business in a way that supports and respects human rights.

## How We Do It

**Respect fundamental rights and freedoms.** Our commitment to upholding human rights is a core value at HP, shaping how we do business worldwide. We believe all people are entitled to internationally recognized basic rights and freedoms. We promise to respect the rights expressed in the HP Sustainability Policy.

**Live up to our values.** We take steps to advance the respect of human rights and do not permit child, prison, forced, or trafficked labor. We expect our suppliers to make the same commitment and provide employees and suppliers with ways to report concerns.

**Raise a concern.** Any employee that believes he or she has been impacted adversely or has observed an adverse human rights impact is encouraged to report the suspected violation to his or her manager or an [internal resource](#). HP will conduct due diligence, promptly investigate allegations, and pursue action to mitigate any adverse human rights impact.

## Find Out More

[HP Sustainability Policy](#)

# Reduce our environmental footprint

## What We Do

Work to minimize our environmental footprint and conserve resources.

## How We Do It

**Promote sustainability.** 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 materials efficiency, promote reuse and recycling, and avoid materials of concern. We also support waste reduction, materials recycling, and safe disposal of hazardous materials in the communities where we live and work.

**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 are proactive in ensuring that our suppliers do the same.

**Do your part.** Understand how you can contribute to sustainability at HP. This could be through product design and development, efficient use of resources, or participation in HP site or community environmental initiatives or volunteer activities.

## Find Out More

- [HP Sustainability Policy](#)
- [HP Standard 011: General Specification for the Environment](#)
- [HP Environmental Health and Safety Policy](#)
- [HP Sustainability Website](#)

# Make a difference

## What We Do

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

## How We Do It

**Volunteer responsibly.** You are encouraged to take an active role in making a positive difference in your community, but make sure your political or charitable activities remain personal. Do not use HP’s resources without approval from HP to do so.

**Contribute responsibly.** We encourage you to make personal contributions to causes and organizations you support. 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 the communities where we operate 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 as well as to ensure that these investments are properly classified. When approaching HP for financial support, nonprofit organizations often use the terms “donation” and “sponsorship” interchangeably. 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.

**Respect differing political views.** If you engage in civic activities or share political views, do not use HP’s time to do so and make it clear that your perspective is your own. HP Government Relations is solely responsible for managing political contributions (including donations of products, services, transportation, and facilities) on behalf of HP. You must also obtain approval from this team before lobbying a government official or engaging a lobbyist.



## Act with Integrity

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

**A:** This might be OK. Reach out to the Government Relations team in advance, and if approved, make sure your participation in the event complies with our policies.

## Find Out More

- HP Global Volunteerism Policy
- HP Conflicts of Interest Policy
- HP Global Charitable Contributions Policy
- HP Political Participation Policy
- HP Sponsorship Policy

# Closing Thoughts from Chris Kloes

We want HP to be a company known for its ethical leadership—a company where employees are proud to work; a company with which customers, partners, and suppliers want to do business.

The global business environment in which HP operates presents many challenges and can put employees in difficult situations that may push the boundaries of ethical practices. Integrity at HP helps address those situations. With its embedded tools, links, and avenues for raising questions, it is designed to provide you with the guidance and confidence you need to make the right choice, no matter where you are located in the world. It is up to you to choose the right action. The next time you face a difficult situation ask yourself, “Am I acting ethically?” before you make that decision. We are all accountable to make winning the right way a reality.

[Chris Kloes](#)  
Deputy General Counsel and  
Chief Ethics and Compliance Officer

# Our Resources

## HP Human Resources

Contact Human Resources

## Local Integrity at HP Team

Contact Local Team

## Business Group or Region Integrity at HP Liaison

Contact Liaison

## HP Ethics and Compliance Office

Mail: HP Inc.  
Ethics and Compliance Office  
1501 Page Mill Road  
Mailstop 1560  
Palo Alto, CA 94304-1112  
United States

## The Ethics telephone line, a 24/7 resource available anywhere in the world

To find your in-country phone line, select your country from the “Call Us” dropdown list [available here](#).

## Global Legal Affairs

Contact Global Legal Affairs

## Corporate Affairs

Media inquiries can be sent to [mediarelations@hp.com](mailto:mediarelations@hp.com)

## Waivers and updates to Integrity at HP

Integrity at HP is the new name for the HP Standards of Business Conduct (the “SBC”). For all purposes, Integrity at HP serves as our HP Standard of Business Conduct.

HP understands and respects your rights as an employee. Keep in mind that nothing in Integrity at HP is intended to interfere with your right to speak publicly about matters of public concern or to engage in activities that are protected under Section 7 of the U.S. National Labor Relations Act. This includes communicating about 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 General Counsel may grant exceptions or waivers to this document for employees and non-executive officers. The Board of Directors must approve any waivers for directors or executive officers and must properly disclose such waivers to the public.