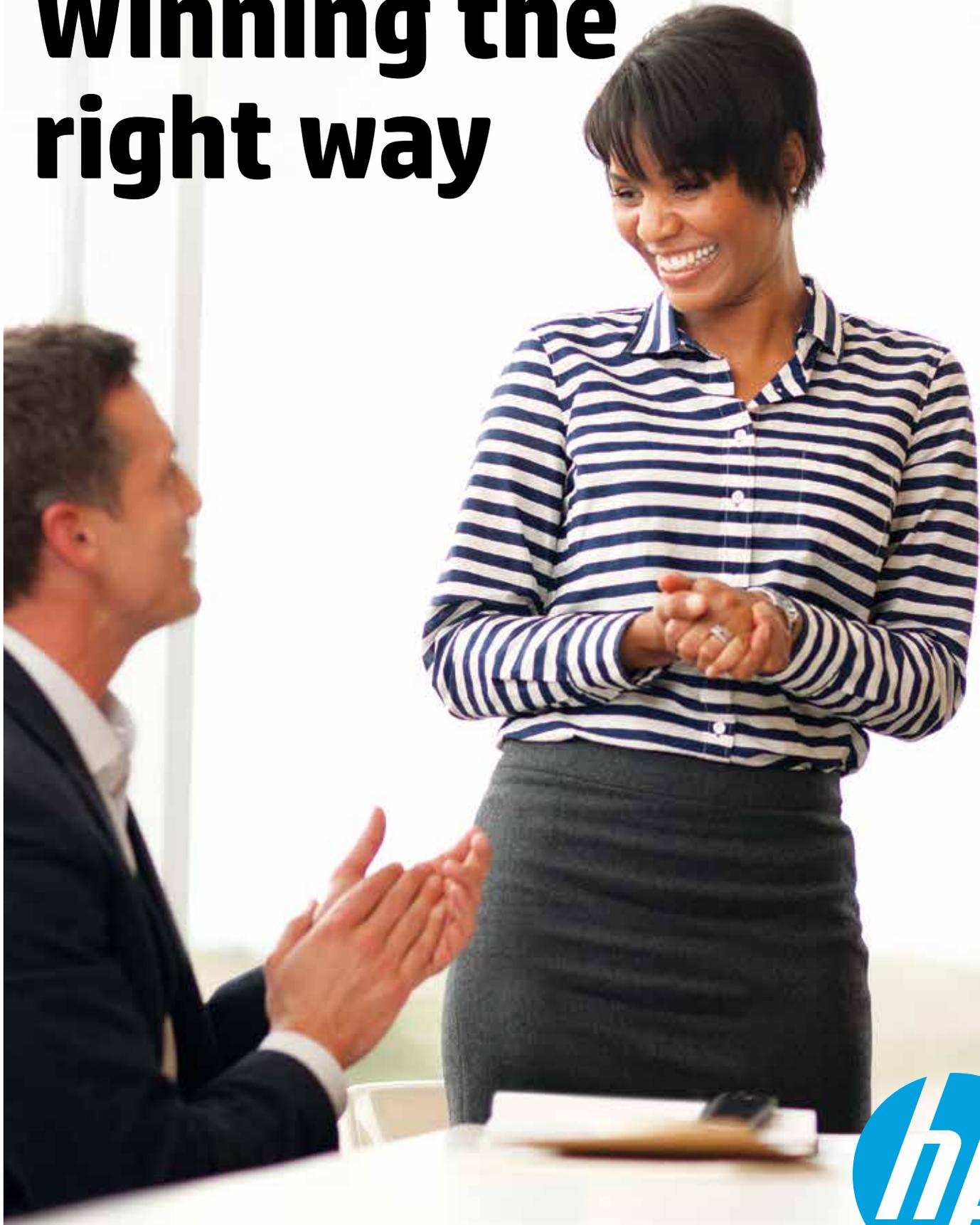


Standards of business conduct

# Winning the right way



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  - 18** It is up to you to choose the right action to make winning the right way a reality. HP depends on each of us to:
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**Since Bill Hewlett and Dave Packard started our company many years ago, HP has been known not just for the products and services we offer, but also for the values we share.**

### **HP Values**

**Trust & Respect**  
**Achievement & Contribution**  
**Results through Teamwork**  
**Meaningful Innovation**  
**Uncompromising Integrity**

### **Core Principles**

**We have a desire to **make a difference****  
**We are driven to **achieve meaningful results****  
**We believe in the **power of people****

### **Leader Attributes**

**Always Accountable**  
**Will to Win**  
**Passion for Customers**  
**Highly Capable & Innovative**  
**People & Team Developer**



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

**We gain trust by treating others with integrity, respect, and fairness. We must continue to demonstrate these values in all our interactions, every day.**



## A message from Meg Whitman

At HP, how we do things is as important as what we do.

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. The HP Standards of Business Conduct (SBC) sets the standards that guide our business practices and govern our behavior.

We are all responsible for protecting and enhancing HP's reputation for integrity. Every decision we make matters in our effort to deliver meaningful contributions to people, organizations, our communities, and the world. We're accountable for our actions, responsible for their consequences, and proud of our efforts. Together, let's build trust in everything we do by living our values.

### **Meg Whitman**

CEO

## A message from Ashley Watson

HP has built its reputation as an exceptional company by doing business ethically and in compliance with the law. Doing otherwise can damage our reputation and business we've worked so hard to build. We take our ethical responsibilities very seriously, and we must work together to address any issues that arise under the SBC, related policies, and local laws. This includes all of us speaking up and reporting what doesn't seem right.

We provide a variety of avenues for employees to ask questions or voice their concerns. And we don't tolerate retaliation against employees who speak up honestly and in good faith. We take action when we find misconduct, and we hold people accountable.

The SBC is a key part of the company's unique culture and identity, and we're proud to stand behind it. Its standards and supporting policies set expectations and are designed to give you the guidance and confidence to make ethical choices even in tough situations, no matter where you are located in the world. If you don't know what to do, reach out and ask—your leaders, Legal, Human Resources, or my office can help you find the answer so you can make the right choice.

Our continued success depends on all of us working together and competing to win, while at all times acting with honesty, integrity, and respect. Let's win the right way.

### **Ashley Watson**

Chief Ethics and Compliance Officer

## Using the HP Standards of Business Conduct

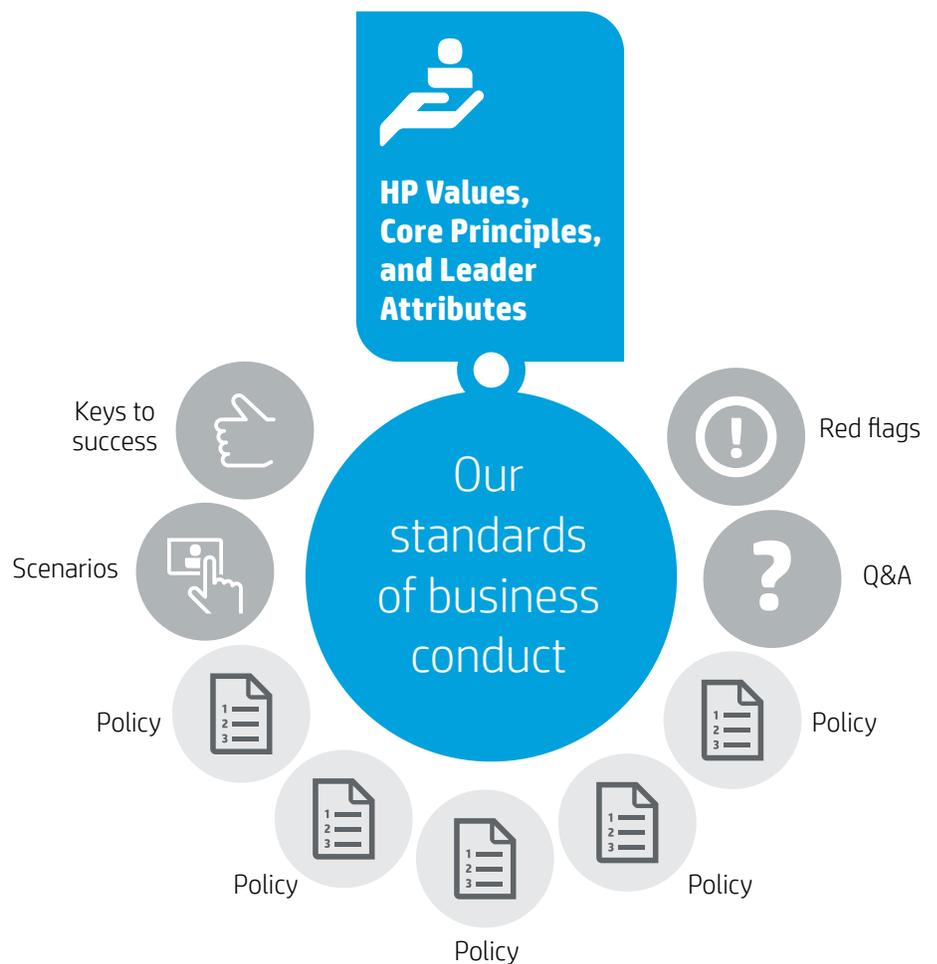
HP does not tolerate retaliation against anyone who raises a concern or question honestly and in good faith.

The SBC is a resource for employees and all those who represent HP. All employees and members of the Board of Directors are required to act in ways that are consistent with the SBC.<sup>1</sup>

The SBC is based on HP's values, core principles, and leader attributes. It represents the highest level of guidance. In addition, there are other rules and specific policies that are to be followed and enforced within HP. As figure 1 illustrates, information on these rules and policies, including relevant corporate policies, may be found by following links throughout the SBC. There is also additional guidance in the form of key points & practices, questions and answers, and red flags.

Because HP is committed to getting things done the right way, violations of the SBC or HP policies or rules may result in disciplinary action, up to and including termination of employment.

**Figure 1.** HP Standards of Business Conduct



<sup>1</sup> HP also sets high standards for those who perform services for or on behalf of HP through our Partner Code of Conduct, Supplier Code of Conduct, and Contingent Worker Code of Conduct.



When concerns or questions come up, communication at the local level, either peer-to-peer or with your manager, is often the best place to start. When it is not possible to raise or resolve an issue with your immediate manager, use the Open Door Policy to contact the next level of management, or contact HP Human Resources, your local SBC team, your business group or region SBC liaison, or the HP Ethics and Compliance Office:

- By email: [corporate.compliance@hp.com](mailto:corporate.compliance@hp.com)
- By phone: Call the Guideline from anywhere in the world, 24 hours a day. Translators are available and callers can remain anonymous except where anonymous reporting is prohibited by local law.

From the U.S. and Canada: 800-424-2965

Outside the U.S. and Canada:

1. Go to AT&T Access Codes
2. Find your country in the alphabetical listing
3. Dial the AT&T Direct® Code
4. When prompted, dial 800-424-2965

- By mail:  
Hewlett-Packard Company  
Ethics and Compliance Office  
Mailstop 1050  
3000 Hanover St.  
Palo Alto, CA 94304-1112  
United States

## The Headline Test

### Unsure about a decision or action?

#### Consider the following:

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.

**Figure 2.** Headline Test



“Before I make a decision, I consider how it would look in a news story.”

We should each ask ourselves what the impact would be if our conduct or actions became public or were reviewed by colleagues we respect. If you are uncomfortable with the answer, don't do it!

Check it with:

- Your manager
- Another manager
- HP Office of the General Counsel
- HP Human Resources
- Your local SBC team
- Your business group or region SBC liaison
- Phone call to the GuideLine
- Email to: [corporate.compliance@hp.com](mailto:corporate.compliance@hp.com)

**Key points & practices**

- Engage in open and honest communication in all your business interactions
- Keep your promises—show others that they can rely on your word
- Be willing to make the right decision for HP, even if it is not the best decision for your organization or you personally

**Question and answer**

**Q:** I have a concern, but it is not covered in the SBC. Does that mean there is no problem?

**A:** No. The SBC cannot possibly address every situation or ethical dilemma. However, the principles, values, and other guidance discussed in the SBC, including the Headline Test, can help you make the right decision. We are all expected to act ethically even in the absence of a company policy. If you need more help, talk to your manager, another member of management, HP Human Resources, your local SBC team, or your business group or region SBC liaison. You can also contact the HP Ethics and Compliance Office.

**Red flags:****We take action when aware of misconduct and do not retaliate**

- Awareness of an issue without willingness to raise it with anyone
- Different treatment of any employee who raised an issue or concern

**We cooperate with investigations**

- Withholding of relevant documents or information from investigators or auditors
- Lies to, or less than complete honesty with, investigators or auditors
- Deletion of documents or information in response to an investigation or audit
- Discussion of an internal investigation with others without permission from the investigation team, except communication with governmental agencies in compliance with local law

## Building trust

### We gain trust by treating others with integrity, respect, and fairness

**We make ethical decisions**

- Obey the law and HP policies
  - Do not engage in any fraudulent conduct or behavior
  - Seek guidance from the SBC and the resources and policies linked to it
  - Talk to colleagues, your manager, or other members of management to get help to make the right decision
  - Use your good judgment, the Headline Test, and the supporting decision-making model to work through situations when the right course of action may not be clear
  - Always act honestly, in good faith, and in a respectful manner when raising concerns or otherwise using the SBC
  - Managers must be ethical leaders and cultivate a work environment that promotes integrity, trust, and respect
  - Managers must provide proper guidance to employees and take appropriate action to prevent, detect, and respond to misconduct
- » [Global HR Policies](#)
- » [Fraud Mitigation Policy](#)

**We take action when aware of misconduct and do not retaliate**

- Every employee has a responsibility to report any alleged misconduct immediately, including misconduct by employees, clients, visitors, contractors, partners, and suppliers
  - Use the Open Door Policy to raise concerns with your manager. If this does not work or seem appropriate, go to another member of management, [HP Human Resources](#), your [local SBC team](#), or your [business group or region SBC liaison](#). Also contact the [HP Ethics and Compliance Office](#) if you have a question or concern that you are not comfortable discussing with your management team
  - Speak up for HP values, knowing that our company does not tolerate retaliation against anyone who raises a concern honestly and in good faith
  - Managers must encourage open and honest communication, and ensure that employees can ask questions or raise concerns without fear of retaliation
- » [Global Open Door Policy](#)

**We cooperate with investigations**

- Cooperate fully with all internal investigations and audits
  - Work with the HP Office of the General Counsel to respond to litigation or requests from government and other external agencies
  - Tell the whole truth when responding to an investigation or audit
  - Never alter or destroy records in response to litigation, an investigation, or an audit, whether ongoing or anticipated
  - Do not discuss an internal investigation with anyone, inside or outside HP, unless you are permitted to do so by the internal investigators or are communicating with government agencies in compliance with local law
- » [HP Global Master Records and Information Management Policy](#)
- » [Litigation and Investigations Policy](#)

**Key points & practices**

- Treat others the way you and they would like to be treated
- Let others know if they make you uncomfortable
- Report concerns to your manager, another member of management, HP Human Resources, your local SBC team, your business group or region SBC liaison, or the HP Ethics and Compliance Office
- Behave professionally, and do not threaten or intimidate anyone

**Question and answer**

**Q:** Different countries have different cultures and laws. Does the SBC apply worldwide?

**A:** Yes. The SBC establishes principles for business conduct applicable throughout HP, regardless of the location or the particular HP organization or business. Where differences exist on any particular question, as a result of local customs, cultures or laws, employees must apply either the SBC or local requirements—whichever sets the highest standard of behavior with respect to the situation.

**Red flags:****We promote and provide a harassment-free work environment**

- Dismissive attitude or comments about anti-harassment policies
- Depiction of harassers as victims or victims as complainers
- Unwelcome remarks, gestures, advances, or physical contact
- The display of sexually explicit or offensive pictures or other materials
- Sexual or offensive jokes or comments (explicit or by innuendo)
- Verbal abuse
- Threats or taunting

## Respect

We treat all people—inside and outside the company—with fairness, dignity, and respect

**We honor human rights**

- Support and respect the protection of human rights and ensure that our business partners and suppliers do the same
- Avoid complicity in human rights violations that could arise through our businesses actions
- Take all allegations seriously through prompt investigation and pursue action to mitigate any adverse human rights impacts
- Ensure that child labor, prison or forced labor, and physical punishment are never permitted in any operation of HP, or our business partners or suppliers
- Respect the right of employees to organize in labor unions and collectively bargain in accordance with local laws and established practices

» [Global Human Rights Policy](#)

» [Global Citizenship Policy](#)

**We treat others with respect**

- Be open and honest with one another
- Do not discriminate against any employee or applicant for employment because of any characteristic protected by law, including gender, color, race, ethnicity, national origin, religion, age, marital status, sexual orientation, gender identity and expression, disability, pregnancy, covered veteran status, protected genetic information, and political affiliation
- Embrace the diversity of all members of the HP team

» [Global HR Policies](#)

» [Global Non-Discrimination Policy](#)

**We maintain a safe and secure work environment**

- Comply with safety, health, and security policies and procedures
- Correct or report any health, safety, or security threats
- 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

» [Environmental Health and Safety Policy](#)

» [Global Security Standards](#)

**We promote and provide a harassment-free work environment**

- Do not behave in a disrespectful, hostile, violent, intimidating, threatening, or harassing manner
- Encourage a harassment-free work environment
- Refuse to accept or tolerate sexual harassment, including unwelcome sexual advances, requests for sexual favors, or the physical or computer image display of sexually-explicit posters, pictures, cartoons, or drawings, and other verbal or physical conduct of a sexual nature

» [Global HR Policies](#)

» [Harassment-Free Work Environment Policy](#)

**We respect privacy and protect personal information**

- Provide transparency in HP practices, provide choice to customers regarding their privacy preferences, and honor those choices
- Protect the personal information of current and former employees, members of the Board of Directors, customers, job applicants, online users, business partners, and suppliers
- Obtain and use personal information solely for legitimate business purposes, and only if you have a legitimate need to know

» [Global Master Privacy Policy](#)



### Key points & practices

- Do the right thing, regardless of the pressure
- Make the right decision for HP, not yourself or others
- Protect all HP assets, remembering that our reputation is the most important asset to keep—and the easiest to lose



### Red flags:

#### We use assets wisely

- Coworkers who are excessively protective of their computers (because they may be concerned that their misuse of their computers or other HP assets may be discovered by others)
- HP property that is not secured when not in use
- Those who allow others to borrow or use HP equipment without approval
- Unknown individuals without proper credentials on HP premises
- Excessive use of HP resources for personal purposes
- Use of HP resources to access or store inappropriate materials
- Lax enforcement of electronic access control cards and other tools that provide access to HP facilities
- Sharing of passwords



#### We maintain accurate business records

- Establishment of any off-the-books funds or undisclosed or unrecorded assets or liabilities
- Undocumented agreements with customers, business partners, or suppliers
- Backdating of contracts or other documents
- Creation of side letters or side agreements outside of the HP contracting processes
- The act of creating or entering into false contracts or other documents



#### We avoid conflicts of interest

- Outside employment with, or receiving compensation from, a customer, business partner, supplier, or competitor
- Significant financial interest in a customer, business partner, supplier, or competitor held by you or a family member
- Conducting business with a business partner, supplier, channel partner or customer when someone in your family, or anyone else with whom you have a close personal relationship, has a substantial role in that company
- Service in a government or public body that has regulatory authority over HP or that purchases from HP
- Family members or individuals with close personal relationships should not report to each other, either directly or indirectly

## Uncompromising integrity

### We are open, honest, and ethical in all of our dealings

#### We use assets wisely

- Keep personal use of HP assets to a minimum
- Do not allow other people, including friends or family, to use HP resources
- Theft, damage, or unauthorized possession or use of property or systems is prohibited
- Do not use HP equipment or systems to violate the law or to create, store, or send content that others might find offensive
- Avoid any usage that might lead to loss or damage, including the introduction of viruses or a breach of our IT security
- Uphold your responsibility to protect HP financial assets

» [Conflicts of Interest Policy](#)

» [IT Policy Set](#)

#### We maintain accurate business records

- 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
- Sign only documents, including contracts, that you are authorized to sign and that you believe are accurate and truthful
- Remember that email and other electronic communications may be business records; avoid exaggeration, derogatory language, and other expressions that could be taken out of context
- Do not establish any undisclosed or unrecorded HP fund or asset for any purpose
- Do not enter into any side letters or side agreements
- Retain, protect, and dispose of records according to policy

» [Accounting and Finance Manual](#)

» [Global Master Records and Information Management Policy](#)

#### We avoid conflicts of interest

- Make decisions in the best interest of HP
- Discuss with your manager any situation that could be perceived as a potential conflict of interest
- Proactively address situations that may put your interests or those of a family member or friend in potential conflict with HP

» [Conflicts of Interest Policy](#)



- Family members or individuals with close personal relationships should not directly or indirectly be involved in each other's employment-related decisions such as hiring, work assignments, compensation, performance reviews, disciplinary actions, or recommendations for promotions



**Question and answer**

**Q:** Are there any limits on what types of gifts or entertainment can be provided to a representative of a customer, partner, or other person on behalf of HP?

**A:** Yes. HP has restrictions on the types of amenities that may be provided to our customers, partners, or other third parties, because certain types of amenities create unnecessary risk to HP. Refer to the Global Business Amenities Policy.

The following business amenities are never permitted:

- Cash, loans, stock, or stock options
- Cash gift cards such as, but not limited to, American Express, Visa, MasterCard
- Any gift or entertainment provided in direct exchange for a reciprocal action
- Any item that is illegal or sexually explicit, involves gambling, or would otherwise violate our values or the SBC
- Any item that might present an appearance of impropriety or conflict of interest
- Any item exchanged during a competitive bid process or contract negotiation
- Excessive, lavish, or frequent gifts or entertainment
- Any item that might violate the recipient's policies
- Amenities given to, or received from, immediate family members (parents, children, spouse, and in-laws), significant others, close friends, and business associates (e.g., agents, consultants, etc.) of third parties. Exception is infrequent attendance of immediate family member or significant other at commercial events of nominal value where the family members or significant others of HP employees are also attending or where customary for a family member or significant other to attend.



**We provide and accept gifts and entertainment only when appropriate**

- Frequent giving or receipt of gifts, meals, travel, or entertainment to or from customers, business partners, or suppliers
- Giving or receipt of gifts, meals, travel, or entertainment to or from customers, business partners, or suppliers during a bid, deal, or contract negotiation
- Lavish or excessive gifts, meals, travel, or entertainment

**We provide and accept gifts and entertainment only when appropriate**

- Provide gifts, meals, travel, and entertainment only if they comply with the Global Business Amenities Policy; gifts, meals, travel, and entertainment must be reasonable for the business relationship and intended only to improve HP's image, better represent products and services, or establish cordial relationships
- Accept gifts, meals, travel, and entertainment only if they comply with the Global Business Amenities Policy
- Exchange gifts, meals, travel, and entertainment that foster goodwill in business relationships, but never provide or accept gifts, meals, travel, or entertainment that may create undue influence, or even the appearance of undue influence, and never provide or accept gifts, meals, travel, or entertainment in exchange or return for a reciprocal action
- Provide gifts, meals, and entertainment only if consistent with the policies of the recipient's employer, as well as HP policies
- Do not provide gifts, meals, or entertainment to a government official unless doing so is legal and consistent with HP policies
- Do not solicit gifts, meals, or entertainment
- Report to your manager any gifts, meals, or entertainment you receive, as required by the Global Business Amenities Policy
- Consult the Global Business Amenities Policy before offering or accepting gifts, meals, travel or entertainment, and act according to the policy, including any approval process
- » [Conflicts of Interest Policy](#)
- » [Global Business Amenities Policy](#)
- » [Anti-Corruption Policy](#)
- » [U.S. Business Amenities Policy](#)

**We do not bribe or accept kickbacks**

- Do not offer or provide bribes or other improper payments or inducements to win business or to influence a business decision—anywhere on anything, even if it means losing business in the short term
- Do not request or accept a bribe or kickback of any sort
- Report to your manager any requests for, or offers of, bribes or kickbacks
- Do not make facilitation payments, and report any requests for facilitation payments
- Use agents and distributors only after they have passed our due diligence process to ensure that our commissions or fee arrangements will not be used as bribes on our behalf
- » [Global Business Amenities Policy](#)
- » [Anti-Corruption Policy](#)
- » [Global Anti-Corruption website](#)

**We protect sensitive information**

- Use and disclose HP, customer, business partner, and supplier sensitive information only for valid business purposes and only if the appropriate protections are in place
- Properly label sensitive information to indicate how it should be handled, distributed, and destroyed
- Share sensitive information outside HP only with authorized parties who have signed a confidential disclosure agreement
- Share sensitive information inside of HP only with employees who have a need to know
- Follow HP procedures for reuse, redeployment, and return of all your HP work equipment
- Understand and follow HP policies for the use of social media, including but not limited to user forums, blogs, social platforms (for example, Facebook, Twitter, and others), chat rooms, and bulletin boards



**We do not bribe or accept kickbacks**

- Request by an agent for payments in a different country, to a third party, or in cash
- Requests for, or offers of, cash or favors
- Directions from a government official that a particular agent is to facilitate a transaction
- An agent who has a reputation for making prohibited payments
- An agent who requests fees higher than the market rate without reasonable explanation
- A close personal relationship between an agent and a government official
- Request by an agent for a charitable or political contribution
- An agent who objects to HP's efforts to perform due diligence



**We protect sensitive information**

- Failure to mark sensitive information as "sensitive" or "confidential"
- Sending of sensitive information to unattended fax machines or printers
- Loud or open discussion of sensitive information when others might be able to hear
- Distribution of copyrighted materials without the appropriate copyright notice
- Discussions about HP proprietary information with customers or suppliers without proper approval and knowledge of the status of the relationship as confidential or nonconfidential
- Confidential drafts and notes that are improperly discarded or not shredded when no longer needed
- Use of "free" or individually purchased internet hosting, collaboration or cloud services, "just to get the job done"



**We do not trade on or disclose material nonpublic information**

- If invited to join an expert network, advisory board, peer exchange, or other information sharing group, be alert to the following red flags:
- Expert networks sponsored by firms managing stock market investments
  - Invitations made without apparent involvement of a firm's legal department
  - Requests that you not inform HP about your participation
  - Requests for details of possible future events at HP
  - Requests for any material nonpublic information

- Never discuss HP intellectual property, trade secrets, and other company confidential information in social media
- Contact HP Legal if you are unsure how information should be handled, whether something is confidential or for any other questions
- » [Confidential Information Policy](#)
- » [Social Media and Blogging Governance Policy](#)

**We comply with laws governing international trade**

- Remember that every product and service marketed by HP, as well as technical information related to products and services, must be classified by Global Trade to ensure compliance with applicable regulations in all countries where HP authorizes delivery
- Seek guidance from HP Global Trade to ensure that all transfers of products, services, and technology comply with applicable laws
- Screen all customers and business partners against the list of embargoed countries and government sanctioned parties, and obtain appropriate government export authorizations where required
- Maintain appropriate import, export, and customs records and controls
- Respond to requests relating to boycotts only as permitted by the HP Global Trade Policies or the HP Office of the General Counsel
- Ensure compliance with immigration laws and obtain proper authorizations (including work permits and visas) in each country when working on behalf of HP
- » [Global Trade Policies](#)
- » [Global Employee Mobility Policy](#)
- » [HP Standard 014-0: Safe and Legal Products](#)

**We do not trade on or disclose nonpublic material information**

- Do not trade in HP securities while you are aware of material nonpublic information about HP, or pass material nonpublic information about HP to others or make recommendations to others about the purchase or sale of HP securities while you are aware of the material nonpublic information
- Do not trade in the securities of any other company while you are aware of material nonpublic information about that company or pass material nonpublic information about that company to others or make recommendations to others about the purchase or sale of that company's securities while you are aware of the material nonpublic information
- Remember that material nonpublic information is information that has not been released to the public that a reasonable investor would consider important in deciding whether to buy, sell, or hold securities
- Recognize that exercising employee stock options may be considered a "trade"
- Become familiar with the HP Insider Trading Policy, including any quarterly trading restrictions that may be applicable to you
- » [Confidential Information Policy](#)
- » [Insider Trading Policy](#)
- » [Insider Trading Compliance webpage](#)

**Key points & practices**

- Focus on treating the customer right
- Compete fairly
- Choose business partners, suppliers, and others who represent HP with care

**Question and answer**

**Q:** To help me do a better job at HP, I kept several documents from my previous employer describing various processes they used. Can I use those documents at HP?

**A:** It depends. If the documents contain your former employer's confidential or proprietary information, you cannot use or share this information. HP expects all employees to honor any disclosure or use restrictions on the confidential information they have obtained from former employers or other third parties. In fact, new employees are instructed not to bring such information onto HP premises. If you are unsure, you should not use or share this information until you have consulted with the HP Office of the General Counsel.

**Red flags:****We compete vigorously and fairly**

- Formal or informal understandings with competitors that stabilize prices or allocate sales territories, product lines, or groups of customers
- Exchange of information with competitors on these subjects
- Agreements with customers, business partners or suppliers that establish the resale price of a product or service, limit a customer's right to sell a product, or make the sale of a product or service conditional on the purchase of other products or services
- Pricing that is below cost, especially when we have a substantial share of the market
- Unfair discrimination between similarly situated customers or channel partners

**We obtain business intelligence appropriately**

- Use of anyone else's confidential information without appropriate approvals
- Requests for or gaining of competitor pricing information from customers, business partners, or suppliers
- Pressure on or encouragement of an HP employee to discuss a previous employer's confidential information
- Suggestions from third parties for new products, product features, or services when the source of the original idea is not fully known
- Acquisition of information through any behavior that you would not be willing to fully disclose
- Reliance, without verification, on third parties' claims that business intelligence was properly obtained

## Passion for customers

### We put our customers first

**We provide quality products and services**

- Promise only what you can deliver
- Deliver on what you promise
- Remember that products and services delivered by HP stand for quality
- » [HP Quality Policy](#)
- » [HP Standard 014-0: Safe and Legal Products](#)
- » [HP Standard 014-2: Supplier Safe and Legal Products](#)

**We market responsibly**

- Represent our products and services fairly, accurately, and truthfully
- Do not create misleading impressions in any advertising, marketing, or sales materials or presentations
- Protect the HP brand and marks, and use them only with proper authorization
- Use due diligence in preventing situations that may lead to the gray marketing of HP products
- Do not make false or illegal claims about competitors or their products and services
- Use due diligence when choosing a business partner or supplier to ensure that they meet HP standards
- » [Brand Guidelines and Tools](#)
- » [Marketing and Sales Policies](#)
- » [External Communications and Endorsement Principles](#)
- » [End-User Customer Verification Policy](#)

**We compete vigorously and fairly**

- Do not use a substantial market position to establish restrictive practices that diminish competition without valid business justification or consumer benefits
- Do not agree with competitors or partners to any type of bid rigging or improper collusion; this includes, but is not limited to, setting prices, limiting production, or dividing up customers, suppliers, or markets
- » [Antitrust/Competition Law Legal Resources Website](#)

**We obtain business intelligence appropriately**

- Respect people's obligations to protect the confidential information of their current and former employers; never induce anyone to violate any obligation of confidentiality
- Do not request, accept, use, or share confidential competitor information
- Ensure that third parties acting on our behalf live up to our standards
- Do not disclose customer, business partner, or supplier nonpublic pricing information
- Accept information in confidence only when HP management agrees that we need it, and only under a written agreement that defines and limits our obligations in dealing with it
- » [Confidential Information Policy](#)



### Key points & practices

- Take community interests into account when making decisions
- Make decisions with a long-term view
- Remember that people outside HP judge us solely on our actions because they do not know our decision-making processes



### Question and answer

**Q:** I've seen activities at HP that may be creating an environmental hazard, but I don't want to get involved. Isn't this the safest course?

**A:** No. All HP employees are responsible for taking action when aware of potential violations of the SBC. This responsibility includes reporting environmental hazards or other unsafe working conditions of which you are aware. Retaliation against anyone making a good faith report will not be tolerated.

When concerns or questions come up, communication at the local level, either peer-to-peer or with your manager, is often the best place to start. When it is not possible to raise or resolve an issue with your immediate manager, use the Open Door Policy to contact another member of management, or contact HP Human Resources, your local SBC team, your business group or region SBC liaison, or the HP Ethics and Compliance Office.



### Red flags:

#### We are responsible citizens

- Use of materials that endanger the environment
- Careless treatment of a supplier's confidential information such that it is accessible to others
- Creation of undocumented agreements with customers, business partners, or suppliers
- Discussion with a reporter of HP business without involving Corporate Communications
- Support of a political candidate or charity through unapproved use of HP resources
- Use of business partners or agents who have a reputation for unethical conduct/behavior

## Responsible citizenship

We are an economic, intellectual, and social asset in every country and community where we do business

### We are stewards of the environment

- Reduce use of energy, water, and other resources where feasible
- Design and manufacture our products to increase efficiency, reuse, and recycling
- Support waste reduction and recycling efforts at HP and in our communities

» [Global Citizenship Policy](#)

» [HP Standard 011: General Specification for the Environment](#)

» [Environmental Health and Safety Policy](#)

### We engage with responsible business partners and suppliers

- Business partners and suppliers must meet our quality, delivery, service, and pricing standards and be responsible corporate citizens
- Communicate our standards for high business partner and supplier performance in ethics, human rights, management, health, safety, and the environment
- Report any concerns of a business partner or supplier violating our standards
- Shift HP business away from business partners and suppliers who fail to address violations of our standards
- Document all business partner and supplier relationships in appropriate written contracts

» [Global Procurement Policy](#)

» [Global Citizenship Policy](#)

» [Partner Code of Conduct](#)

» [Supplier Code of Conduct](#)

» [Contingent Worker Code of Conduct](#)



**We communicate honestly with investors and the media**

- All communications with investors, analysts, and the media regarding HP business must first be approved by HP Investor Relations, Corporate Communications, or the appropriate HP communications specialists
- Never give the impression that you are speaking on behalf of HP in any personal communication or social media, including user forums, blogs, chat rooms, and bulletin boards
- » [Confidential Information Policy](#)
- » [External Communications and Endorsement Principles](#)
- » [Social Media and Blogging Governance Policy](#)

**We exercise our rights in the political process**

- Ensure that your individual political views and activities are not viewed as those of HP
- Obtain advance approval from HP Corporate Affairs before lobbying a government official or engaging a lobbyist
- Remember that HP Corporate Affairs is solely responsible for managing political contributions on behalf of HP, including donations of products, services, transportation, and facilities
- » [Political Participation Policy](#)

**We support giving and volunteering in our communities**

- Get involved with efforts of your choice to improve your community
- Do not pressure others to contribute to or join your preferred charities, groups, or political activities
- Do not participate in HP decisions regarding a charity or other organization where you volunteer
- Do not use HP resources for the benefit of your preferred charities, groups, or political activities, unless approved officially by HP
- » [Global Contributions Policy](#)
- » [Employee Volunteerism Policy](#)
- » [Conflicts of Interest Policy](#)



## Winning the right way, every day

We are all occasionally faced with situations where the right decision is not necessarily a clear one. Our SBC, together with its embedded tools, links, and avenues for raising questions, is provided to help you make the right choice.

**It is up to you to choose the right action to make winning the right way a reality. HP depends on each of us to:**

- Understand the SBC and underlying rules and policies, and comply with their provisions
- Internalize the HP Way Now values, core principles and leader attributes that drive our everyday behaviors
- Use the Headline Test to guide decision making when challenged with ethical issues
- Become familiar with the key points and practices in order to model ethical behavior
- Recognize red flag behaviors or actions
- Know where to go and whom to contact if a question or concern arises

**For HP to enhance its reputation as a company with a culture of integrity and ethical leadership, we must all work together, in line with our values, to win the right way, every day.**

We need to inspire the trust of customers, business partners, suppliers, and our colleagues. At all levels, we should fulfill our commitments to others as outlined in the SBC.



### **Contacting the Ethics and Compliance Office**

If you have a question or wish to discuss a possible concern or violation of the SBC, you should first use the Open Door Policy to discuss it with those in your management chain. If you are uncomfortable with that approach for any reason, or if no action is taken after your discussion, you may contact HP Human Resources, your local SBC team, your business group or region SBC liaison, or the HP Ethics and Compliance Office:

- By email: [corporate.compliance@hp.com](mailto:corporate.compliance@hp.com)
- By phone: Call the Guideline from anywhere in the world, 24 hours a day. Translators are available and callers can remain anonymous except where anonymous reporting is prohibited by local law.

From the U.S. and Canada: 800-424-2965

Outside the U.S. and Canada:

1. Go to AT&T Access Codes
2. Find your country in the alphabetical listing
3. Dial the AT&T Direct® Code
4. When prompted, dial 800-424-2965

- By mail:  
Hewlett-Packard Company  
Ethics and Compliance Office  
Mailstop 1050  
3000 Hanover St.  
Palo Alto, CA 94304-1112  
United States



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