

Contingent Worker Code of Conduct

Organization: GLA	Policy ID: HP001-04	Last revision: 8-Aug-2022
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Introduction

HP is committed to the highest standards of business ethics and regulatory compliance. We gain trust by treating others with integrity, respect, and fairness. We must demonstrate these values in all our interactions, every day.

Scope

This policy is applicable to all non-employees (“contingent workers”) performing services for HP at an HP site, or an alternate work location such as a home office, HP customer site, or other designated HP workplace and all suppliers of contingent workers to HP. In addition, it is also applicable to HP personnel managing the contracts and assignment of contingent workers.

Policy

We must ensure that contingent workers and suppliers of contingent workers share our commitment to conducting business with integrity. Contingent workers are expected to act with the highest standards of business ethics and must not engage in any fraudulent, illegal or unethical conduct or behavior.

All contingent workers must, under the direction and control of their respective employers, comply with the provisions set out in this Contingent Worker Code of Conduct. Contingent workers must also comply with all laws, rules and government regulations applicable to HP in their location.

All suppliers of contingent workers to HP shall comply with and ensure that their employees are aware of, trained on, and comply with this Contingent Worker Code of Conduct and all laws, rules and government regulations applicable to HP in their location.

In addition to this Contingent Worker Code of Conduct, contingent workers must also comply with any HP policy that states it is applicable to contingent workers. All HP policies referenced in this Code of Conduct, and any others that may be applicable to contingent workers, can be found on the [Policy Directory](#).

Equal opportunity

Unlawful discrimination in the workplace is prohibited. When conducting HP business, contingent workers must not discriminate against anyone because of 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 or any characteristic protected by law.

Work environment

HP is committed to maintaining a work environment¹ free from discrimination and harassment, one where employees are treated with dignity and respect. Harassment in the workplace is prohibited. When conducting HP business, contingent workers must not behave in a disrespectful, hostile, violent, intimidating, threatening or harassing manner.

Sexual harassment can take many forms and all forms are unacceptable. This includes any behavior toward any employee or contingent worker by a manager or coworker that involves unwelcome sexual advances, requests for sexual favors, the display of sexually-explicit materials, or any other verbal or physical conduct of a sexual nature.

Contingent workers must comply with environmental, health, safety and security policies and procedures, and correct or report any environmental, health, safety, or security threats. Acts of workplace violence will not be tolerated. Workplace violence includes acts or threats of physical violence and any conduct that is sufficiently severe, offensive, or intimidating to result in another individual becoming reasonably fearful or apprehensive about his or her safety or the safety of his or her family or property.

Anti-corruption

Contingent workers must not offer bribes, kickbacks, or engage in corrupt practices. Contingent workers must comply with all ethical standards and applicable law in every country in which HP does business.

Contingent workers must not offer or provide bribes, kickbacks or gifts to win or retain business or to improperly influence a business decision. Contingent workers are prohibited from offering, promising, or providing money or anything of value, either directly or indirectly, by employees or through other parties, to any person to obtain or retain business or otherwise gain a business advantage in any country.

The U.S. Foreign Corrupt Practices Act (FCPA) and the UK Bribery Act (UKBA) apply to the actions of all HP employees, HP subsidiaries, joint ventures, contingent workers, agents, and representatives.

The FCPA and the UKBA prohibit any payment or gift to government officers and employees, political parties, candidates for public or political office, or members of royal families for the

¹ HP's work environment is defined as anywhere contingent workers 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; at HP-sponsored events; or during travel on behalf of HP.

purpose of winning or keeping business. This includes any entity where a government has greater than 50% ownership or otherwise controls the entity. The UKBA also prohibits any payment or gift to commercial entities for the purpose of winning or keeping business.

Corruption includes, but is not limited to, acceptance or payment of:

- Anything of value provided for the purpose of winning or keeping business
- Any form of bribe or kickback

Facilitation Payments

Unless subjected to duress, contingent workers may not offer or make facilitation payments to any government official for routine government actions, either directly or indirectly. Duress occurs when a contingent worker fears physical harm or imprisonment if the facilitation payment isn't made and there is no safe alternative to complying with the demand. The duress exception applies only to one-time payment, typically of small value. Repeated facilitation payments or facilitation payments of high value are not permitted. Any demand or payment of a facilitation payment must be reported to HP Global Legal Affairs within 24 hours of the payment.

Business gifts and entertainment

Contingent workers may not provide or receive business amenities (gifts, meals, services, entertainment, or anything else of value) when doing so creates the appearance of impropriety or undue influence. This restriction applies to amenities given to or received from representatives of HP, or its current or potential customers, channel partners, suppliers, other business partners or competitors. If you have questions, please contact your employer or amenities@hp.com.

Anti-Human Trafficking

Contingent workers are expected to treat all people with fairness, dignity and respect. HP does not permit child, prison, forced or trafficked labor in our operations. Suppliers of contingent workers and contingent workers are prohibited from engaging in trafficking in persons, which includes but is not limited to the illegal movement of people, trafficking in persons, sexual exploitation, and the use of forced or child labor of any form. HP is committed to taking action against human trafficking, child labor, and forced labor in our operations. If such activity occurs, HP's response may include terminating contracts and such other measures that will ensure no further inappropriate activity occurs.

HP, its employees, contractors, subcontractors (including suppliers and agents), contingent workers, and others performing work on behalf of HP are prohibited from:

- Engaging in "severe forms of trafficking" in persons during the period of performance of the contract
- Procuring commercial sex acts during the contract period
- Using forced labor in the performance of the contract
- Destroying, concealing, confiscating, or otherwise denying access to a worker's identity or

immigration documents

- Using misleading or fraudulent recruitment practices, such as failing to disclose basic information or making material misrepresentations during the recruitment of employees regarding the key terms and conditions of employment, including wages and fringe benefits, and, if applicable, the hazardous nature of the work
- Charging employees or candidates recruitment fees
- Failing to provide certain return transportation or pay for the cost of return transportation upon the end of employment, if applicable
- Providing or arranging housing that fails to meet the host country housing and safety standards and, if required, failing to provide an employment contract, recruitment agreement, or similar work document, written in a language the employee understands at least 5 days prior to the employee relocating

Any contingent worker that believes he or she has been a victim of human trafficking, child labor or forced labor, or has knowledge of such offenses should exercise HP's Open Door Policy to report such incident to his or her manager, another leader, the People Organization, or the Ethics and Compliance Office.

Fair Employment

When suppliers of contingent workers recruit employees, information provided to potential candidates about the prospective work is to be truthful and candidates are not to be charged applicant or recruiting fees. Suppliers of contingent workers shall comply with applicable wage and hour laws and must:

- Pay employees regularly and at intervals not exceeding one month²
- Pay wages in accordance with local and national applicable wage statutes and not withhold deductions as a disciplinary measure
- Not interfere with their employees' control of, or access to, their identity documents or passports or right to resign at any time

Freedom of Association

Suppliers of contingent workers shall respect the right of their employees to organize in labor unions and collectively bargain in accordance with local laws and established practices.

Finder fees

Contingent workers may not enter into any commission or fee arrangements, except under written agreements, with *bona fide* commercial distributors, sales representatives, agents, or consultants. Any such commission or fee arrangements must be preapproved by HP Global Legal Affairs.

² All Local Country Legislation and Workers Council Agreements will apply.

Conflicts of interest

When conducting HP business, contingent workers must always make decisions in the best interest of HP and based on the contract with their employer. Contingent workers may not receive any personal profit or advantage, other than their compensation from their employer, in connection with any transaction involving HP.

Contingent workers must not engage in:

- Any activity that would present a conflict of interest related to their employer and/or HP
- Any activity that could be perceived as a potential conflict of interest related to their employer and/or HP

Business with family or friends

During their HP assignment, contingent workers must disclose to their employer and HP all situations where they may be conducting business with members of their family, friends, or others with whom they have a close personal relationship. Contingent workers should consult their manager or HP contact if they have questions about the circumstances that might create a conflict of interest.

Work with third parties

Third parties include HP competitors, channel partners, suppliers (other than the contingent worker's employer), and other HP business partners and customers. If specified or covered in the contract with their employer, contingent workers may not work for any third parties while on assignment at HP. The HP contract with the supplier must specify the rules for the relationship with any other third parties (such as channel partners, competitors, and customers not defined in the contract).

Use of HP resources

Any use of HP assets, resources, or equipment, including the company's computers and information systems, must be solely for HP business purposes and must be consistent with all HP policies and guidelines. Contingent workers may not use any HP resource in violation of law and must not allow other people, including friends and family, to use HP resources. Contingent workers should avoid any usage that might lead to loss or damage, including the introduction of viruses or a breach of HP's IT security. Theft or unauthorized possession or use of HP assets is prohibited.

HP resources may not be used to create, transmit, store, copy, or display messages, images or materials that are:

- For personal gain
- Solicitations
- Chain letters
- Threatening, pornographic, sexually explicit, harassing, demeaning or otherwise offensive

HP may, as allowed by applicable local laws, access and inspect all HP resources that contingent workers may use, including HP computers, servers and systems, telephones, voicemail, and email systems, desks, lockers, cabinets, storage areas, vehicles and other equipment belonging to HP. For reasons related to safety, supervision, security, and other concerns, HP may inspect persons and property on HP premises at any time and without notice, as allowed by applicable local laws.

Contingent workers should not have any expectation of personal privacy in any messages or records created, transmitted or stored by means of HP systems. HP owns all business emails, voicemails, and any other non- personal data of any kind stored on or transmitted by HP equipment. As allowed by applicable local law, HP may access or retrieve such data at any time.

Prevent system breaches

Keeping HP 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)

Safeguard HP 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 HP electronic assets

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

Avoid:

- 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
- 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

Confidentiality

Contingent workers are expected to be familiar with and adhere to any specific confidentiality terms agreed to between their employer and HP. If an agreement covering the protection of confidential information does not exist, contingent workers must presume that all information made available to them in conducting HP business is confidential. This includes information of third parties that HP may have received, such as information from HP's suppliers, customers, or business partners. Confidential information may only be used for valid business purposes and must be protected from disclosure to a third-party by the contingent worker with the same level of care as their employer's confidential information.

Contingent workers must understand and follow HP's policies regarding the protection of confidential information and the use of social media, including user forums, blogs, chat rooms, and bulletin boards, and must never discuss HP intellectual property, trade secrets, and other company confidential information on social media.

Third-party confidential information

- Former employers: Contingent workers are expected to honor any valid disclosure or use restrictions on confidential information of their current or former employers. Such confidential information in any tangible or readable form must not be brought onto HP premises without the prior written consent of such former employers.
- Competitors: Contingent workers must not request, accept, use, or share confidential information of HP's competitors.
- Other third parties: Contingent workers must not disclose confidential information of customers, business partners, or suppliers, including non-public pricing information.

Contingent workers must never induce anyone to violate any obligation of confidentiality.

Records

All records created in conducting HP business must be complete and accurate, and must be retained, protected and disposed of according to HP policy. All true payments made on behalf of HP must be properly documented. Contingent workers must not enter into any side letters or side agreements or establish any undisclosed or unrecorded HP fund or asset for

any purpose. Records include email and other communications, and contingent workers should communicate in a professional manner.

Gray marketing

“Gray marketing” is the trade of product through distribution channels that are unofficial, unauthorized, or unintended by HP. Contingent workers must use due diligence in preventing situations that may lead to the gray marketing of HP products. Contingent workers must promptly report any suspected gray marketing activity to their employer, as well as to the HP Ethics and Compliance Office.

Global trade compliance

Contingent workers must understand and follow HP’s global trade policies and procedures to ensure HP’s products, services, and technology are not imported, exported, or transferred in violation of applicable law.

Insider trading

Contingent workers may, at times, have access to material non-public information, which is confidential information concerning HP’s business, financials or strategy that a reasonable investor would consider important in deciding whether to buy, sell, or hold securities—and that information has not been released to the public. Trading stock, or causing stock to be traded, on the basis of material non-public information, regardless of the size of the trade or where the trader is located, is a violation of U.S. securities laws and, depending on the circumstances, the laws of other countries. Anyone who violates these laws may be subject to severe civil and criminal sanctions.

Working in other countries

When a contingent worker is conducting HP business outside his or her resident country, the contingent worker must ensure compliance with immigration laws, and obtain proper authorizations (including work permits and visas), in each country in which they conduct business or perform work.

Discussions with press or media

Contingent workers are not authorized to speak to the media on behalf of HP. 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. If you are contacted by a member of the news media, refer them directly to HP Corporate Communications (mediarelations@hp.com).

Privacy

Contingent workers must follow HP privacy and data protection policies, standards, and specifications, as well as any external compliance codes of conduct or standards required by HP when conducting HP business and in using online and offline systems, processes, products, and

services that involve the use, storage, or transmission of any personal data from HP customers, business partners, employees, and other individuals. Personal data is any information relating to an identified person, or information that can result in the identification of a person either directly or indirectly.

Non-solicitation

Contingent workers may not solicit any HP employee during the HP employee's working time for purposes not related to their HP engagement. Contingent workers may not distribute literature or other materials in HP working areas or solicit or hand out materials for any reason not related to their HP engagement, including for charitable purposes.

Cooperation with investigations and audits

Contingent workers must cooperate fully and honestly with all HP internal investigations and audits and provide all applicable documents when responding to an investigation or audit. Contingent workers must not destroy or alter any records, and must not discuss an internal investigation with anyone, inside or outside HP, unless permitted to do so by the internal investigators or in communicating with government agencies in compliance with local law.

Additional provisions

This Contingent Worker Code of Conduct must be read and adhered to in conjunction with the applicable code of conduct and policies (if any) of the contingent worker's employer. In addition, the requirements set out above are not all-inclusive. Any conduct that could raise questions about HP's commitment to the highest standards of business ethics and compliance is prohibited. Contingent workers with questions concerning this Contingent Worker Code of Conduct should contact their employer, a member of HP management, or HP's Ethics and Compliance Office.

Reporting violations

Contingent workers have an obligation to report any alleged misconduct immediately, including misconduct by HP employees, clients, contractors, partners, and suppliers.

Contingent workers should make reports to their employer, and a member of HP management or HP's Ethics and Compliance Office. HP does not tolerate retaliation against anyone who raises a concern.

HP's Ethics and Compliance Office can be reached as follows:

- **Telephone:** From anywhere in the world, call the in-country phone line to report concerns. A list of in-country phone numbers can be accessed [here](#). The phone line is available 24 hours a day and supports anonymous reporting.
- **Web form:** Report concerns using the [web form submission tool](#). This method supports anonymous reporting.
- **Mail:**
HP Inc.
Ethics and Compliance Office

Mailstop 1560
1501 Page Mill Road
Palo Alto, CA 94304-1112
United States

This is a version of HP001-04, *Contingent Worker Code of Conduct*, prepared for the HP portal.

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Updated August 2022