Hewlett-Packard Company
Contingent Worker Code of Conduct

Hewlett-Packard Company is committed to the highest standards of business ethics. All suppliers, consultants and contractors doing business with HP agree to deliver their services in a manner consistent with this commitment. Accordingly, each such supplier, consultant and contractor shall ensure that any member of its workforce (including employees, suppliers, agents, etc.) involved in the performance of services for or on behalf of HP is aware of, trained on and complies with this Code of Conduct.

All non-employees performing services for HP (hereinafter “contingent workers”) must under the direction and control of their respective employers, comply with the following provisions and adhere to the highest standards of business ethics.

Compliance with Laws, Rules and Regulations

Contingent workers must comply with all laws, rules and government regulations applicable to HP wherever it does business.

Equal Opportunity

Unlawful discrimination in the workplace is prohibited. Contingent workers must not in the conduct of business discriminate on the basis of race, creed, color, religion, gender, sexual orientation, gender identity/expression, national origin, disability, age or any other protected status.

Work Environment

Harassment in the workplace is prohibited. Such harassment includes offensive verbal, physical, or visual behavior and actions directed toward an individual, based upon the individual’s gender, color, race, ancestry, religion, national origin, age, physical or mental disability, sexual orientation, gender identity/expression or other protected status.

All forms of sexual harassment are unacceptable. This includes 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.
Conflicts of Interest

General. Contingent workers must not engage in any activities that would present a conflict of interest related to their employer and/or HP.

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 may create 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 and competitors.

Agency contractors under the direction and control of their employer are expected to adhere to the additional provisions set forth below.

Work with Competitors. Agency contractors may not work for an HP competitor during their HP assignment.

Work with Channel Partners, suppliers and others. Agency contractors may not work for a HP channel partner, supplier, OEM, alliance partner, marketing partner or other business partner during their HP assignment.

Work with Customers. Agency contractors may not work for an HP end-user customer in the purchase or support of any HP products or services.

Business with Family or Friends. During their HP assignment, agency contractors must disclose to their employer all situations where they may be conducting business with members of their family, friends or others with whom they have a close personal relationship.

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 the law and must not allow others, including friends and family, to use HP resources for any purpose. 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; or messages, images or materials that HP deems to be threatening, pornographic, sexually explicit, harassing or demeaning to any person or group.
HP may, as allowed by applicable local laws, access and inspect all HP resources that contingent workers may use for personal activity, including HP computers, servers and systems, telephones, voicemail systems, desks, lockers, cabinets, 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, subject to applicable local laws.

Contingent workers should not have any expectation of personal privacy in any messages or records created, transmitted or stored via HP systems. HP owns all business emails, voicemails and any other non-personal data of any kind stored on or transmitted by HP equipment. HP has the right to access or retrieve such data at any time.

**Anti-Corruption**

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

**Anti-bribery.** Contingent workers may not directly or indirectly bribe or improperly influence any federal, provincial, state or local governmental employee in any country. The U.S. Foreign Corrupt Practices Act (“FCPA”) prohibits any payment or gift to government officials, political parties, or candidates for office outside of the U.S. for the purpose of winning or keeping business. The FCPA covers the actions of HP, HP subsidiaries, joint ventures, agents and representatives.

**Finder Fees.** Contingent workers may not enter any commission or fee arrangements except under written agreements with bona fide commercial distributors, sales representatives, agents or consultants.

**Records.** All payments made on behalf of HP must be properly documented.

**Gray Marketing**

Contingent workers must avoid and report any situation that could lead to the unauthorized diversion of HP products, such as noncompliance with permitted territorial assignments, abuse of pricing and promotional programs, etc. Contingent workers should promptly report any suspected gray marketing activity to their employer as well as the HP Ethics and Compliance Office.
Insider Trading

Contingent workers may at times have access to “material insider” information, which is undisclosed information concerning HP’s business that, if disclosed to the public, could influence an ordinary investor’s decision to buy or sell HP’s stock or other securities.

Trading stock, or causing stock to be traded, on the basis of material inside 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 as well. Anyone who violates insider trading laws may be subject to severe civil and criminal sanctions.

Confidentiality

Contingent workers are expected to be familiar with and adhere to any specific confidentiality terms agreed to between their employer and HP. If a separate confidentiality agreement does not exist, contingent workers must presume that all information available from HP is confidential. This includes information that HP may have received from its suppliers, customers or business partners. Confidential information may only be used or disclosed as necessary and appropriate to perform assigned duties on behalf of HP.

Third-Party Confidential Information

Contingent workers are expected to honor any valid disclosure or use restrictions on confidential information received from any current or former employers or any other third-parties. Such information in any tangible or readable form must not be brought onto HP premises without the prior written consent of such former employers or other third-parties.

Discussions with Press or Media

Contingent workers are not authorized to speak to the media on behalf of HP unless authorized in writing by HP’s communications group.

Privacy

Contingent workers must follow HP privacy policies and data protection practices in using online and offline systems, processes, products and services that involve the use, storage or transmission of any personally identifiable data from HP customers, business partners, employees and other individuals. Personal information includes data related to a person who can be identified or located by that data.
Non-Solicitation

Contingent workers may not solicit any HP employee during the HP employee's working time. Further, contingent workers may not distribute literature or other materials in HP working areas. This policy prohibits soliciting or handing out materials for any non-business reason, including for charitable purposes.

Additional Principles

This Code of Conduct must be read in conjunction with the standards of conduct, if any, of the respective contingent worker’s employer. In addition, the principles described above are not all-inclusive. Any conduct that could call into question HP’s commitment to the highest standards of business ethics is prohibited. Contingent workers with questions concerning this Code of Conduct must contact their employer, a member of HP management or HP’s Ethics and Compliance Office.

Reporting Violations

Contingent workers are expected to report any conduct that they believe in good faith to be inconsistent with this Code of Conduct or with the law. Reports should be made to their employer, and a member of HP management or HP’s Ethics and Compliance Office. HP will not retaliate, nor tolerate retaliation committed by others, against those who report in good faith suspected violations of this Code or other wrongdoing.

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

- Email: corporate.compliance@hp.com
- Telephone: Guideline 1-800-424-2965
  (Outside U.S., first dial AT&T Access Number)
- Mail: Hewlett-Packard Ethics and Compliance Office
  PO Box 692015, Houston, TX 77269-2015
Supplier Code of Conduct

All suppliers of contingent workers are expected to adhere to the highest standards of ethics in their own business transactions as highlighted in the HP Supplier Code of Conduct:

**Business Integrity:** The highest standards of integrity are to be expected in all business transactions. Any and all forms of corruption, extortion and embezzlement are strictly prohibited, resulting in immediate termination and legal actions.

**No Improper Advantage:** Bribery or other means of obtaining undue or improper advantage are not to be offered or accepted.

**Disclosure of Information:** Information regarding business activities, structure, financial information and performance is to be disclosed in accordance with applicable regulations, and prevailing industry practices.

**Intellectual Property:** Intellectual property rights are to be respected; transfer of technology and know-how is to be done in a manner that protects intellectual property rights.

**Fair Business, Advertising and Competition:** Standards of fair business, advertising and competition are to be upheld. Means to safeguard customer information should be available.

**Protection of Identity:** Programs that ensure the protection of supplier or employee whistleblower confidentiality are to be maintained.

**Community Engagement:** Community engagement is encouraged to help foster social and economic development.

Suppliers, contractors and other providers of contingent workers are responsible for ensuring that they and their employees adhere to the standards set forth in the above Codes of Conduct. Providers must ensure that each of their employees conducting business for HP receives a copy of the HP Contingent Worker Code of Conduct and must have a mechanism in place by which their employees can report suspected violations of the Code or other ethical concerns.

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1 This is an excerpt from HP’s Supplier Code of Conduct. The entire text of the Code can be found at www.hp.com/hpinfo/globalcitizenship/environment/pdf/supcode.pdf