



## Global Business Amenities Policy

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<b>Sponsor:</b>	Glenn Leon, Senior Vice President and Chief Ethics and Compliance Officer	<b>Revision:</b> W	15-Feb-2015
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(Translations: Arabic, Bulgarian, Chinese-Simplified, Chinese-Traditional, Czech, Dutch, French, German, Hebrew, Hungarian, Indonesian, Italian, Japanese, Korean, Polish, Portuguese, Russian, Spanish, Vietnamese, English)

### Introduction

HP's Anti-Corruption Policy provides the guidelines and principles to help HP's directors, officers and employees uphold HP's anti-corruption commitment. This Global Business Amenities Policy establishes HP's standards for providing or receiving business amenities to or from third parties and applies to all HP employees worldwide. Because some countries may have more restrictive rules than those provided in the *Business Amenities Limits* section of this Policy, you should always consult and comply with the country-specific rules as they apply. Before providing any business amenity, ask yourself these questions:

- (1) Is the recipient Public Sector or Commercial Sector? What might be acceptable for Commercial Sector recipients may not be acceptable for Public Sector recipients.
- (2) Is there a country-specific rule that applies? The country you should look at is the country where the recipient works.
- (3) When was the last time HP gave business amenities to or received business amenities from this recipient? Does the frequency or timing create the appearance of impropriety?
- (4) Are my actions consistent with HP's Anti-Corruption Policy and other rules, guidelines and values?

A business amenity can be anything of value. It can be any gift, meal, travel, service, prize, event ticket/pass, promotion, entertainment, reimbursement, loan, favor, or item of value, whether given or received, by an HP employee, where the recipient is receiving something for free. For this Policy, a business amenity does not include something given as part of a sale, or which the recipient has a contractual right to receive, for example sales promotions, rebates, discounts or sales incentives. For such items, marketing and sales policies may apply. If in doubt, please get advice from your HP attorney.

This Policy does not apply to business amenities, events or activities involving only HP employees such as internal gifts, meals, or entertainment.

Definitions of the terms used in this Policy are located below. Violations of this Policy may lead to disciplinary action, up to and including termination of employment with HP. Any employee with

knowledge or suspicion of any violations of this global policy must report these concerns to the Ethics and Compliance Office.

## **General Principles**

The behavior of HP employees must be in accordance with both the relevant legal requirements and HP's values. Many countries have established very strict laws regarding bribery and our employees must be aware that their conduct could expose both HP and themselves to criminal and civil liability. Before providing anything of value to third parties, you must review this Policy and comply with the country-specific or global rules, as appropriate. Some third parties may not be able to accept anything of value from HP either because of internal policies or contractual limitations. You should confirm with the third parties that they can accept something of value prior to providing a business amenity. If you have any questions about this Policy, consult your HP attorney.

Certain items of value can never be provided to or received from third parties:

- Cash – in any form – is absolutely prohibited.
- Cash-equivalent gift cards such as American Express, Visa or MasterCard gift cards, as well as gold and other precious metals or gemstones are also strictly prohibited.
- You cannot accept cash (or cash equivalent) in return for advocating or selling products from a partner/supplier, except commissions and customer loyalty programs as allowed under HP's Conflicts of Interest Policy.
- You cannot provide gifts to or receive gifts from a third party involved in a pending competitive bid process or contract negotiation with HP.
- You cannot provide or receive any item or entertainment that is illegal or sexually explicit, involves gambling or would otherwise create embarrassment to the company.
- You may not provide business amenities to, or receive business amenities from, the immediate family members (parents, children, spouses, and in-laws), significant others, close friends and business associates (e.g., agents, consultants, etc.) of third parties. The only exception is the infrequent attendance of an 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 it would otherwise be customary for a family member or significant other to attend.
- You may not indirectly provide or receive any business amenity through a third party that this Policy would prohibit you to provide or receive directly. This includes asking a third party to pay for any business amenity on HP's behalf, for example using Market Development Funds.

Whether or not a business amenity was provided free of charge or at a reduced cost to HP, you must comply with the rules in this Policy if you intend to give the item(s) to any third party. The value of an amenity is its open market value. For example, if HP pays for a sponsorship or makes a payment to a charitable organization and receives something of value in return, e.g., tickets to the event, the value of those tickets is the amount that the tickets would have sold for on the open market.

All uses of HP funds and assets must be documented in compliance with the HP Accounting and Finance Manual and HP employees must follow all expense reimbursement rules to obtain reimbursement of business amenities. You must keep accurate records of all business amenities provided to or received from any third party (including the name and entity of the third party), and retain them in accordance with the HP Records Management Policy. As a reminder, the most senior person in attendance at a meal/entertainment must pay so that his or her manager (and not themselves) is authorizing the charge.

## **Business Amenities Limits**

In order to determine whether you can provide or receive business amenities, consult the country-specific rules and the tables below based on the Total Value of the business amenity, and follow the general principles of this Policy and the Anti-Corruption Policy. Any required approvals must be in writing and obtained in advance of providing or receiving the business amenity. You must consult the U.S. Public

Sector Compliance Office for any business amenity intended to be provided to a representative of a U.S. (including U.S. territories) federal, state or local government entity (including public or private K-12 educational institutions and all libraries).

You will find three separate sets of limits below:

- Business Amenities provided to Public Sector Recipients
- Business Amenities provided to Commercial Sector Recipients
- Business Amenities received by an HP employee from a Third Party

Business amenities connected to an HP Event are treated differently by this policy and certain requirements apply as described in the tables below. “Event” means any activity where HP products and services are showcased, and the participants will receive any business amenity or item of value. “Event” does not include ordinary business meals or amenities. Examples of “Events” include:

- o HP organized corporate activities
- o Demonstrations of HP products
- o Trade show events
- o CIO events
- o Road shows
- o Advisory councils
- o Executive Briefing Center/Lab visits
- o Technical workshops, seminars, lunch and learns
- o Sales promotional account activities

For Public Sector, the dollar limits of the amenities (not including gifts) provided at Events may be relaxed slightly, if the Event is pre-approved using the Amenities Approval Tool and if the country-specific limits for the country in which the Public Sector recipient works allow the limits to be relaxed. For Commercial Sector, the limits on the amenities we provide at Events may be relaxed slightly, as discussed below.

You are required to strictly comply with all ethical standards and applicable laws in every country in which HP does business. If you have questions after your review of the limits, contact your HP attorney for guidance.

<b>Business Amenities Provided to Public Sector Recipients</b> (unless more restrictive country-specific rules apply: <a href="#">click here to check</a> )			
<b>Type of Business Amenity</b>	<b>Total Value - USD</b>	<b>Prior Written Approval Requirements</b>	<b>Limitations</b>
Gifts	\$0 - \$50	Approval not required	<ul style="list-style-type: none"> <li>• Not allowed during RFP/contract negotiations</li> <li>• Once per quarter</li> </ul>
	\$50.01+	Not allowed	<ul style="list-style-type: none"> <li>• Not allowed</li> </ul>
Tickets or passes to concerts/sporting events	\$0 - \$50	Approval not required	<ul style="list-style-type: none"> <li>• Once per quarter</li> </ul>
	\$50.01 +	Not allowed	<ul style="list-style-type: none"> <li>• Not allowed</li> <li>• For example, tickets/passes to World Cup, Formula 1, Olympics and similar events are not allowed</li> </ul>
HP products/services	\$0 - \$50	Approval not required	<ul style="list-style-type: none"> <li>• Once per quarter</li> </ul>
	\$50.01 +	Not allowed	<ul style="list-style-type: none"> <li>• Not allowed</li> </ul>
Gift cards/coupons for non-HP products and services	\$0 - \$50	Approval not required	<ul style="list-style-type: none"> <li>• Must not compete with HP's products or services</li> <li>• Cash equivalent gift cards are not allowed</li> </ul>
	\$50.01 +	Not allowed	<ul style="list-style-type: none"> <li>• Not allowed</li> </ul>

**Business Amenities Provided to Public Sector Recipients**  
(unless more restrictive country-specific rules apply: [click here to check](#))

<b>Type of Business Amenity</b>	<b>Total Value - USD</b>	<b>Prior Written Approval Requirements</b>	<b>Limitations</b>
Gift cards/coupons for HP products and services	\$0 - \$50	Approval not required	<ul style="list-style-type: none"> <li>Once per quarter</li> </ul>
	\$50.01 +	Not allowed	<ul style="list-style-type: none"> <li>Not allowed</li> </ul>
Meals/entertainment	\$0 - \$150	Approval not required	<ul style="list-style-type: none"> <li>Once per quarter</li> </ul>
	\$150.01 +	Not allowed	<ul style="list-style-type: none"> <li>Not allowed</li> </ul>
Travel/accommodations	\$0 +	Amenities Approval Tool	<ul style="list-style-type: none"> <li>Once per quarter</li> <li>Economy class required for domestic flights and for international flights of less than 5 hours</li> <li>Business class allowed for international flights longer than 5 hours</li> <li>Must be for legitimate business purpose including the promotion, demonstration or explanation of HP's products or services</li> </ul>
Raffle/lucky draw (U.S. Public Sector)	\$0 +	Amenities Approval Tool	<ul style="list-style-type: none"> <li>Submit request at least 2 weeks in advance of the raffle/lucky draw</li> </ul>
Raffle/lucky draw (non-U.S. Public sector)	\$0 - \$50	Approval not required	<ul style="list-style-type: none"> <li>Tax forms may be required, contact your local Controllershship Office</li> </ul>
	\$50.01 - \$999.99	Approval not required	<ul style="list-style-type: none"> <li>Tax forms may be required, contact your local Controllershship Office</li> <li>Winner must complete the Raffle Acceptance Form</li> <li>Form is maintained by the employee organizing the raffle/lucky draw as per HP Corporate Record Retention Guidelines</li> </ul>
	\$1000 +	If not part of an HP-sponsored Event being screened through the Amenities Approval Tool, pre-approval by the Anti-Corruption Office is required.	<ul style="list-style-type: none"> <li>Tax forms may be required, contact your local Controllershship Office</li> <li>Winner must complete the Raffle Acceptance Form</li> <li>Form is maintained by the employee organizing the raffle/lucky draw as per HP Corporate Record Retention Guidelines</li> </ul>
Cash/cash equivalent/per diem/	\$0 +	Not allowed	<ul style="list-style-type: none"> <li>Not allowed</li> </ul>

<b>Business Amenities Provided to Public Sector Recipients</b> (unless more restrictive country-specific rules apply: <a href="#">click here to check</a> )			
<b>Type of Business Amenity</b>	<b>Total Value - USD</b>	<b>Prior Written Approval Requirements</b>	<b>Limitations</b>
gold/other precious metals or gemstones			
Events		<ul style="list-style-type: none"> <li>• Events must be for a legitimate purpose to demonstrate or promote HP's products and services</li> <li>• Agenda should contain at least 80% business activities and no more than 20% leisure activities</li> <li>• All Events involving Public Sector invitees must be screened through the Amenities Approval Tool – there are no exceptions to this requirement</li> <li>• Submit requests at least two weeks in advance of issuing any invitations for the Event</li> <li>• Do not issue invitations until the Event has been approved</li> <li>• If the Event is approved, you must return to the Amenities Approval Tool and enter details of the Event including actual attendees and Total Value of business amenities provided</li> <li>• If Event attendees include Commercial sector as well as Public Sector participants, HP host/Event planner or lead must also ensure that the requirements of this policy are followed for any business amenity provided to the Commercial sector participants</li> </ul>	

<b>Business Amenities Provided to Commercial Sector Recipients</b> (unless more restrictive country-specific rules apply: <a href="#">click here to check</a> )			
<b>Type of Business Amenity</b>	<b>Total Value - USD</b>	<b>Prior Written Approval Requirements</b>	<b>Limitations</b>
Gifts	\$0 - \$50	Approval not required	<ul style="list-style-type: none"> <li>• Does not create the appearance of impropriety</li> <li>• Once per quarter**</li> <li>• Does not create appearance of impropriety</li> </ul>
	\$50.01 - \$150	Manager approval	
	\$150.01 - \$500	Director approval	
	\$500.01 +	Vice president approval & Amenities Approval Tool	
Tickets or passes to concerts/sporting events	\$0 - \$150	Approval not required	<ul style="list-style-type: none"> <li>• Does not create the appearance of impropriety</li> </ul>
	\$150.01 - \$500	Director approval	<ul style="list-style-type: none"> <li>• Once per quarter</li> </ul>
	\$500.01 +	Vice president approval & Amenities Approval Tool	<ul style="list-style-type: none"> <li>• Once per quarter</li> </ul>
HP products/services	\$0 - \$50	Approval not required	<ul style="list-style-type: none"> <li>• Once per quarter</li> <li>• Does not create the appearance of impropriety</li> </ul>
	\$50.01 +	Director approval	

**Business Amenities Provided to Commercial Sector Recipients**  
(unless more restrictive country-specific rules apply: [click here to check](#))

<b>Type of Business Amenity</b>	<b>Total Value - USD</b>	<b>Prior Written Approval Requirements</b>	<b>Limitations</b>
Gift cards/coupons for non-HP products and services	\$0 - \$50	Approval not required	<ul style="list-style-type: none"> <li>Does not create the appearance of impropriety</li> <li>Must not compete with HP's products or services</li> <li>Cash equivalent gift cards are not allowed</li> </ul>
	\$50.01 +	Not allowed	<ul style="list-style-type: none"> <li>Not allowed</li> </ul>
Gift cards/coupons for HP products and services	\$0 - \$50	Approval not required	<ul style="list-style-type: none"> <li>Does not create the appearance of impropriety</li> </ul>
	\$50.01 +	Not allowed	<ul style="list-style-type: none"> <li>Not allowed</li> </ul>
Meals/entertainment	\$0 - \$150	Approval not required	<ul style="list-style-type: none"> <li>Does not create the appearance of impropriety</li> </ul>
	\$150.01 - \$500	Manager approval	<ul style="list-style-type: none"> <li>Once per quarter**</li> <li>Does not create appearance of impropriety</li> </ul> ** Corporate accounts may seek an exception to the frequency limit
	\$500.01 +	Vice president approval & Amenities Approval Tool	
Travel/accommodations	\$0 - \$500	Vice president approval	<ul style="list-style-type: none"> <li>Once per quarter</li> <li>Must be for legitimate business purpose including the promotion, demonstration or explanation of HP's products or services</li> <li>Economy required for domestic flights and international flights of less than 5 hours</li> <li>Business allowed for international flights longer than 5 hours</li> </ul>
	\$500.01 +	Vice president approval & Amenities Approval Tool	
Combination travel/accommodations, gifts, meals and/or entertainment	\$0 - \$500	See approval requirements for each type of business amenity	<ul style="list-style-type: none"> <li>See limitations for each type of business amenity</li> </ul>
	\$500.01 +	Vice president approval & Amenities Approval Tool	<ul style="list-style-type: none"> <li>Once per quarter</li> <li>If the amenities are provided as part of the "conference experience" at an HP Event, then approval via Amenities Approval Tool is not required. You must follow the guidance in this table and the Anti-Corruption Policy regarding Events.</li> </ul>

**Business Amenities Provided to Commercial Sector Recipients**  
(unless more restrictive country-specific rules apply: [click here to check](#))

<b>Type of Business Amenity</b>	<b>Total Value - USD</b>	<b>Prior Written Approval Requirements</b>	<b>Limitations</b>
Raffle/lucky draw	\$0 - \$500	No approval required	<ul style="list-style-type: none"> <li>Tax forms may be required, contact your local Controllershship Office</li> </ul>
	\$500.01 - \$999.99	No approval required	<ul style="list-style-type: none"> <li>Tax forms may be required, contact your local Controllershship Office</li> </ul>
	\$1000 +	If not part of an HP-sponsored Event being screened through the Amenities Approval Tool, pre-approval by the Anti-Corruption Office is required.	<ul style="list-style-type: none"> <li>Winner must complete the Raffle Acceptance Form</li> <li>Form is maintained by the employee organizing the raffle/lucky draw as per HP Corporate Record Retention Guidelines</li> </ul>
Cash/cash equivalent/per diem/gold and other precious metals or gemstones	\$0 +	Not allowed	<ul style="list-style-type: none"> <li>Not allowed</li> </ul>
Events	<ul style="list-style-type: none"> <li>Events must be for a legitimate purpose to demonstrate or promote HP's products and services</li> <li>Agenda should contain at least 80% business activities and no more than 20% leisure activities</li> <li>Meals, gifts, and entertainment should not be lavish – the limits set forth above for business amenities are instructive as to acceptable dollar limits of business amenities provided during an event</li> <li>Event organizer maintains records of what was provided (including value) as per HP Record Retention Guidelines</li> <li>For Events with a Total Value (per person, excluding travel) of \$500.01 USD or more, a record of attendees (name, email, company name, and position) must be documented and retained per HP Record Retention Guidelines</li> <li>If Event attendees include Public Sector as well as Commercial Sector participants, HP host/Event planner or lead must also ensure that the requirements of this policy are followed for any business amenity provided to the Public Sector participants</li> </ul>		

**Business Amenities Received by an HP Employee from a Third Party**  
(unless more restrictive country-specific rules apply, [click here to check](#))

Type of Business Amenity	Total Value - USD	Prior Written Approval Requirements	Limitations
Cash/cash equivalent/gold and other precious metals or gemstones	\$0 +	Not allowed	<ul style="list-style-type: none"> <li>Only commission or customer loyalty programs allowed</li> <li>Customer loyalty programs must comply with HP's Conflicts of Interest Policy</li> </ul>
Gift	\$0 - \$50	Approval not required	<ul style="list-style-type: none"> <li>Does not create the appearance of impropriety</li> </ul>
	\$50.01 - \$150	Manager approval	<ul style="list-style-type: none"> <li>Once per quarter</li> </ul>
	\$150.01 - \$500	Give to manager for appropriate disposition	<ul style="list-style-type: none"> <li>HP employee cannot keep the gift unless the manager determines that it is appropriate to do so</li> <li>Once per quarter</li> </ul>
	\$500.01 +	Vice president approval & Amenities Approval Tool	<ul style="list-style-type: none"> <li>Once per quarter</li> </ul>
Gift cards/coupons for non-HP products and services	\$0 - \$50	Approval not required	<ul style="list-style-type: none"> <li>Does not create the appearance of impropriety</li> <li>Must not compete with HP's products or services</li> <li>Cash equivalent gift cards are not allowed</li> </ul>
	\$50.01 +	Not allowed	<ul style="list-style-type: none"> <li>Not allowed</li> </ul>
Meals/entertainment	\$0 - \$150	Approval not required	<ul style="list-style-type: none"> <li>Does not create the appearance of impropriety</li> </ul>
	\$150.01 - \$500	Manager approval	<ul style="list-style-type: none"> <li>Once per quarter</li> </ul>
	\$500.01 +	Vice president approval & Amenities Approval Tool	<ul style="list-style-type: none"> <li>Once per quarter</li> </ul>
Travel/accommodations	\$0 - \$500	Vice president approval	<ul style="list-style-type: none"> <li>Does not create the appearance of impropriety</li> <li>Must have a legitimate business purpose</li> </ul>
	\$500.01 +	Vice president approval & Amenities Approval Tool	<ul style="list-style-type: none"> <li>Once per quarter</li> <li>Must have a legitimate business purpose</li> </ul>
Combination travel/accommodations, gifts, meals and/or entertainment	\$0 - \$500	See approval requirements for each type of business amenity	<ul style="list-style-type: none"> <li>See limitations for each type of business amenity</li> </ul>
	\$500.01 +	Vice president approval & Amenities Approval Tool	<ul style="list-style-type: none"> <li>Once per quarter</li> </ul>

<b>Business Amenities Received by an HP Employee from a Third Party</b> (unless more restrictive country-specific rules apply, click here to check)			
<b>Type of Business Amenity</b>	<b>Total Value - USD</b>	<b>Prior Written Approval Requirements</b>	<b>Limitations</b>
Participation in raffle/lucky draw	\$0 - \$999.99	Approval not required	<ul style="list-style-type: none"> <li>Tax forms may be required, contact your local Controllershship Office</li> </ul>
	\$1000 +	Written approval from your manager	<ul style="list-style-type: none"> <li>Inform your manager as soon as possible</li> <li>Does not create the appearance of impropriety</li> </ul>

## Definitions

- **Business amenity:** A business amenity can be anything of value. It can be any gift, meal, travel, service, prize, event ticket/pass, promotion, entertainment, reimbursement, loan, favor, or item of value, whether given or received, by an HP employee, where the recipient is receiving something for free. For this Policy, a business amenity does not include something given as part of a sale, or which the recipient has a contractual right to receive, for example sales promotions, rebates, discounts or sales incentives. For such items, marketing and sales policies may apply. If in doubt, please get advice from your HP attorney.
- **Commercial Sector:** Anything other than Public Sector, including consumers and privately owned and controlled entities.
- **Customer:** Includes current HP customers and prospective HP customers, both individuals and entities.
- **Director:** Approvals required from a “director” means the first director in the management chain above you; if you are a director, it means your manager.
- **Event:** Any activity where HP products and services are showcased and the participants will receive any business amenity or item of value as defined in this guidance. Event does not include ordinary business meals.
- **Gift:** Item that is provided free of charge or without payment. Examples include, but are not limited to a gift basket, wine and tobacco; tickets to a sporting event or concert (where an HP employee is not in attendance), or any other item of value.
- **Meals/entertainment:** Food, beverage, or other activities intended to promote HP business. Examples include, but are not limited to breakfast, lunch, dinner, drinks, golf outings, tickets to a sporting event or concert where an HP employee is in attendance.
- **Public Sector entity:** Any entity that is owned or controlled by a government. This will include any entity where a government has greater than 50% ownership, or otherwise controls the entity. You should consult your HP attorney for a determination as to whether an entity is government-owned for purposes of this policy. In countries with government-owned or operated institutions or industries, such as health care, education, energy, telecom, banking or transportation, you should assume these entities are Public Sector.
- **Public Sector recipient:** This includes:
  - Any officer or employee of a government or any department, agency, or public international organization, or any person acting in an official capacity for or on behalf of any such government or any department, agency or public international organization.
  - Members of royal families.

- Candidates for a political office.
- Immediate family members (parents, children, spouses, and in-laws), significant others, close friends, and business associates of a Public Sector employee. The United States considers public and private K-12 educational institutions and all libraries as “Public Sector” entities for the purpose of the U.S. Business Amenities Policy.
- Country-specific policies may define a Public Sector recipient as: Public Sector representative, government official, Public Sector official, Public Sector customer, Public Sector clients, and foreign official.
- **Sponsorship**: Any arrangement whereby HP provides financial support, products, services, or anything of value to a third party (including charitable organizations), in return for the right to associate our image, brands or products with an activity, or to receive some other lawful benefit, such as participation in an event.
- **Third party**: A non-HP party.
- **Total Value**: On a per-person basis, all costs including taxes, gratuities, and shipping costs unless otherwise specified in a country-specific policy. If the exact costs are unknown or cannot be reasonably determined, you must use the fair market value to calculate the total value.
- **Vice president**: Approvals required from a vice president means the first vice president in the management chain above you; if you are a vice president, it means your manager.

Note: This version of the policy is provided for external publication. Accordingly, all HP-internal hyperlinks have been disabled.