



## HP Supplier Code of Conduct

Version 5.0, Effective April 1, 2015

The Electronic Industry Code of Conduct (EICC) establishes standards to ensure that working conditions in the electronics industry supply chain are safe, that workers are treated with dignity and respect, and that business operations are conducted in an environmentally responsible and ethical way. The HP Supplier Code of Conduct (also known as the HP Electronic Industry Code of Conduct or HP EICC Code of Conduct) is based on the EICC Code of Conduct and reflects additional HP standards and expectations and the nature of our Suppliers' operations.

This Policy defines the social and environmental performance requirements for HP Inc. suppliers.

### Scope

All HP Inc. suppliers must comply with the HP Supplier Code of Conduct. HP suppliers include all entities that provide goods or services, whether to or on behalf of HP ("Suppliers"). This includes all Suppliers that are:

- Manufacturing HP products, packaging, parts, components, subassemblies, and materials, or are involved in processes related to that manufacturing; and
- Providing services to or on behalf of HP, regardless of where the service is being performed including at a Supplier's site, at an HP site, or at a customer's site.

### Policy

While we recognize that there are different legal and cultural environments in which Suppliers operate throughout the world, the HP Supplier Code of Conduct (the "HP Code" or "this Code") sets forth the minimum requirements that all Suppliers must meet.

HP goes beyond the EICC Code of Conduct and requires additional social and environmental responsibility related requirements including, but not limited to:

- For Suppliers employing student and/or dispatch workers in China the [HP Student and Dispatch Worker Standard for Supplier Facilities in the People's Republic of China \(PRC\)](#)
- For Suppliers employing foreign migrant workers the [HP Supply Chain Foreign Migrant Worker Standard](#)
- For Suppliers of subassemblies, parts, materials, components, batteries, and packaging that are incorporated into HP brand products the requirements contained in the [HP General Specification for the Environment](#)
- For Suppliers who recycle or dispose of HP electronic hardware products or materials the [Vendor Requirements for Hardware Recycling Standard](#)
- For Suppliers and Sub-suppliers who provide reuse, refurbishment, or remarketing services of electronic hardware products, parts, and components on behalf of HP the [Vendor Requirements for Hardware Reuse Standard](#).
- Other requirements as specified

Suppliers are required to understand and meet these and other requirements where applicable.

The HP Code is a total supply chain requirement. At a minimum, Suppliers shall require their next tier Suppliers to acknowledge and implement the HP Code and hand the HP Code down to their sub-tier Suppliers. The requirements apply to all workers including temporary, migrant, student, contract, direct employees, and any other type of worker.

Fundamental to the HP Code is the understanding that a business, in all of its activities, must operate in full compliance with the laws, rules and regulations of the countries in which it operates.<sup>1</sup> The HP Code encourages Suppliers to go beyond legal compliance, drawing upon internationally recognized standards, in order to advance social and environmental responsibility, and business ethics. Where the HP Code and national or local laws have requirements for the same subject matter, Suppliers shall meet the more stringent requirements.

The HP Code is made up of five sections. Sections A, B, and C outline standards for Labor, Health and Safety, and the Environment, respectively. Section D adds standards relating to business ethics; Section E outlines the elements of an acceptable system to manage conformity to the HP Code. The Reference section outlines the international standards and leading practices which were referenced in the development of the HP Code and may be useful as an additional source of information.

## **A. LABOR**

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HP is committed to ensuring that all workers in its supply chain are treated fairly and with dignity and respect.

The labor standards are:

### **1) Freely Chosen Employment**

Forced, bonded (including debt bonded) or indentured labor; prison labor; or slavery or trafficking of persons shall not be used. This includes transporting, harboring, recruiting, transferring or receiving persons by means of threat, force, coercion, abduction or fraud for labor or services. There shall be no unreasonable restrictions on workers' freedom of movement in the facility, nor unreasonable restrictions on entering or exiting company-provided facilities. As part of the hiring process, workers must be provided with a written employment agreement in their native language that contains a description of terms and conditions of employment prior to the worker departing from his or her country of origin. All work must be voluntary, and workers shall be free to leave work at any time or terminate their employment. Suppliers and agents may not hold or otherwise destroy, conceal, confiscate or deny access by employees to employees' identity or immigration documents, such as government-issued identification, passports, or work permits, unless the holding is required by law. Workers shall not be required to pay for their employment. Suppliers shall maintain adequate controls to ensure that workers have not been charged recruitment or placement fees during their recruitment process and Suppliers are responsible to repay any such fees charged to workers.

Additional requirements specific to Student and Dispatch Workers in China and to Foreign Migrant Workers are contained [in HP's Student and Dispatch Worker Standard for Supplier Facilities in the People's Republic of China \(PRC\)](#) and [HP's Supply Chain Foreign Migrant Worker Standard](#).

### **2) Young Workers**

Child labor is not to be used in any stage of manufacturing or in the provision of services or supplies. The term "child" refers to any person under the age of 15, or under the age for completing compulsory education, or under the minimum age for employment in the country, whichever is greatest. The use of legitimate workplace learning programs, which comply with all laws and regulations, is supported. Workers under the age of 18 ("young workers") shall not perform work that is likely to jeopardize their health or safety, including night shifts and overtime. Suppliers shall ensure proper management of student workers through proper maintenance of student records, rigorous due diligence of educational partners, and protection of students' rights in accordance with applicable law and regulations. Suppliers shall provide appropriate support and training to all student workers. In the absence of local

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<sup>1</sup> The Code is not intended to create new and additional third party rights, including for workers.

law, the wage rate for student workers, interns and apprentices shall be at least the same wage rate as other entry-level workers performing equal or similar tasks.

**3) Working Hours**

Studies of business practices clearly link worker strain to reduced productivity, increased turnover and increased injury and illness. Workweeks are not to exceed the maximum set by local law. Further, a workweek should not be more than 60 hours per week, including overtime, except in emergency or unusual situations. Workers shall be allowed at least one day off every seven days.

**4) Wages and Benefits**

Compensation paid to workers shall comply with all applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits. In compliance with local laws, workers shall be compensated for overtime at pay rates greater than regular hourly rates. Deductions from wages as a disciplinary measure shall not be permitted. For each pay period, workers shall be provided with a timely and understandable wage statement that includes sufficient information to verify accurate compensation for work performed. All use of temporary, dispatch and outsourced labor will be within the limits of the local law.

**5) Humane Treatment**

There is to be no harsh or inhumane treatment, including any sexual harassment, sexual abuse, corporal punishment, mental or physical coercion or verbal abuse of workers; nor is there to be the threat of any such treatment. Disciplinary policies and procedures in support of these requirements shall be clearly defined and communicated to workers.

**6) Non-Discrimination**

Suppliers should be committed to a workforce free of harassment and unlawful discrimination. Companies shall not engage in discrimination based on race, color, age, gender, sexual orientation, gender identity and expression, ethnicity or national origin, disability, pregnancy, religion, political affiliation, union membership, covered veteran status, protected genetic information or marital status in hiring and employment practices such as wages, promotions, rewards, and access to training. Workers shall be provided with reasonable accommodation for religious practices. In addition, workers or potential workers should not be subjected to medical tests or physical exams that could be used in a discriminatory way.

**7) Freedom of Association**

In conformance with local law, Suppliers shall respect the right of all workers to form and join trade unions, of their own choosing, to bargain collectively and to engage in peaceful assembly as well as respect the right of workers to refrain from such activities. Workers and/or their representatives shall be able to openly communicate and share ideas and concerns with management regarding working conditions and management practices without fear of discrimination, reprisal, intimidation or harassment.

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**B. HEALTH and SAFETY**

HP recognizes that in addition to minimizing the incidence of work-related injury and illness, a safe and healthy work environment enhances the quality of products and services, consistency of production and worker retention and morale. HP also recognizes that ongoing worker input and education is essential to identifying and solving health and safety issues in the workplace.

The health and safety standards are:

**1) Occupational Safety**

Worker exposure to potential safety hazards (e.g., electrical and other energy sources, fire, vehicles, and fall hazards) are to be controlled through proper design, engineering and administrative controls, preventative maintenance and safe work procedures (including lockout/tagout), and ongoing safety training. Where hazards cannot be adequately controlled by these means, workers are to be provided

with appropriate, well-maintained, personal protective equipment and educational materials about risks to them associated with these hazards. Workers shall be encouraged to raise safety concerns.

**2) Emergency Preparedness**

Potential emergency situations and events are to be identified and assessed, and their impact minimized by implementing emergency plans and response procedures, including: emergency reporting, employee notification and evacuation procedures, worker training and drills, appropriate fire detection and suppression equipment, adequate exit facilities and recovery plans. Such plans and procedures shall focus on minimizing harm to life, the environment and property.

**3) Occupational Injury and Illness**

Procedures and systems are to be in place to prevent, manage, track and report occupational injury and illness, including provisions to: a) encourage worker reporting; b) classify and record injury and illness cases; c) provide necessary medical treatment; d) investigate cases and implement corrective actions to eliminate their causes; and e) facilitate return of workers to work.

**4) Industrial Hygiene**

Worker exposure to chemical, biological and physical agents is to be identified, evaluated, and controlled. Engineering or administrative controls must be used to control overexposures. When hazards cannot be adequately controlled by such means, worker health is to be protected by appropriate personal protective equipment programs.

Suppliers must also meet the requirements restricting substances in products as well as those used during manufacturing processes in the [HP General Specification for the Environment](#).

**5) Physically Demanding Work**

Worker exposure to the hazards of physically demanding tasks, including manual material handling and heavy or repetitive lifting, prolonged standing and highly repetitive or forceful assembly tasks is to be identified, evaluated and controlled.

**6) Machine Safeguarding**

Production and other machinery shall be evaluated for safety hazards. Physical guards, interlocks and barriers are to be provided and properly maintained where machinery presents an injury hazard to workers.

**7) Sanitation, Food, and Housing**

Workers are to be provided with ready access to clean toilet facilities, potable water and sanitary food preparation, storage, and eating facilities. Worker dormitories provided by the Supplier or a labor agent are to be maintained clean and safe, and provided with appropriate emergency egress, hot water for bathing and showering, and adequate heat and ventilation and reasonable personal space along with reasonable entry and exit privileges.

**8) Health and Safety Communication**

Suppliers shall provide workers with appropriate workplace health and safety training in their primary language. Health and safety related information shall be clearly posted in the facility.

## **C. ENVIRONMENTAL**

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HP recognizes that social and environmental responsibility is integral to producing and providing world class products and services. In manufacturing or industrial operations, adverse effects on the community, environment and natural resources are to be minimized while safeguarding the health and safety of workers and the public.

The environmental standards are:

**1) Environmental Permits and Reporting**

All required environmental permits (e.g. discharge monitoring), approvals and registrations are to be obtained, maintained and kept current and their operational and reporting requirements are to be followed.

- 2) Pollution Prevention and Resource Reduction**  
The use of resources and generation of waste of all types, including water and energy, are to be reduced or eliminated at the source or by practices such as modifying production, maintenance and facility processes, materials substitution, conservation, recycling and re-using materials.
- 3) Hazardous Substances**  
Chemical and other materials posing a hazard if released to the environment are to be identified and managed to ensure their safe handling, movement, storage, use, recycling or reuse and disposal.
- 4) Wastewater and Solid Waste**  
Supplier shall implement a systematic approach to identify, manage, reduce, and responsibly dispose of or recycle solid waste (non-hazardous). Wastewater and solid waste generated from operations, industrial processes and sanitation facilities are to be characterized, monitored, controlled and treated as required prior to discharge or disposal. In addition, measures should be implemented to reduce generation of wastewater. Supplier shall conduct routine monitoring of the performance of its wastewater treatment systems.
- 5) Air Emissions**  
Air emissions of volatile organic chemicals, aerosols, corrosives, particulates, ozone depleting chemicals and combustion by-products generated from operations are to be characterized, routinely monitored, controlled and treated as required prior to discharge. Supplier shall conduct routine monitoring of the performance of its air emission control systems.
- 6) Materials Restrictions**  
Suppliers are to adhere to all applicable laws, regulations and HP requirements regarding prohibition or restriction of specific substances in products and manufacturing, including labeling for recycling and disposal.
- 7) Storm Water Management**  
Supplier shall implement a systematic approach to prevent contamination of storm water runoff. Supplier shall prevent illegal discharges and takes steps to ensure that spills are contained.
- 8) Energy Consumption and Greenhouse Gas Emissions**  
Energy consumption and greenhouse gas emissions are to be tracked and documented, at the facility and/or corporate level. Suppliers are to look for cost-effective methods to improve energy efficiency in their operations and to minimize their energy consumption and greenhouse gas emissions.

## **D. ETHICS**

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HP requires its Suppliers, their sub-tier suppliers and any other 3rd party agents to uphold the highest standards of ethics in their business operations.

The ethics standards are:

- 1) Business Integrity**  
The highest standards of integrity are to be upheld in all business interactions. Suppliers shall have a zero tolerance policy to prohibit any and all forms of bribery, corruption, extortion and embezzlement. All business dealings should be transparently performed and accurately reflected on Supplier's business book and records. Monitoring and enforcement procedures shall be implemented to ensure compliance with anti-corruption laws including but not limited to the United Kingdom Bribery Act and the United States Foreign Corrupt Practices Act. Suppliers should conduct appropriate risk-based diligence prior to engaging contractors or third parties to ensure that such third parties comply with the HP Code and the anti-corruption laws. Suppliers are also responsible for ensuring that any third party they engage agrees to abide by business integrity standards that are no less stringent than the provisions of this Code of Conduct.
- 2) No Improper Advantage**  
Bribes or other means of obtaining undue or improper advantage are not to be accepted, promised,

offered, authorized, given or accepted. This prohibition covers promising, offering, authorizing, giving or accepting anything of value, either directly or indirectly through a third party, in order to obtain or retain business, direct business to any person, or otherwise gain an improper advantage.

**3) Disclosure of Information**

Information regarding Supplier labor, health and safety, environmental practices, business activities, structure, financial situation and performance is to be disclosed in accordance with applicable laws, regulations and prevailing industry practices. Falsification of records and / or misrepresentation of conditions or practices are unacceptable.

**4) 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; and, customer information is to be safeguarded.

**5) Fair Business, Advertising and Competition**

Standards of fair business, advertising and competition are to be upheld. Appropriate means to safeguard customer information must be available and used.

**6) Protection of Identity and Non-Retaliation**

Programs that ensure the confidentiality, anonymity and protection of Supplier and employee whistleblowers<sup>2</sup> are to be maintained. Suppliers should have a communicated process for their personnel and workers to be able to raise any concerns without fear of retaliation.

**7) Responsible Sourcing of Minerals**

Suppliers shall have a policy to reasonably assure that the tantalum, tin, tungsten and gold in the products, parts, components, and materials they manufacture does not directly or indirectly finance or benefit armed groups in the Democratic Republic of the Congo or an adjoining country. Suppliers shall exercise due diligence on the source and chain of custody of these minerals and make their due diligence measures available to customers upon customer request.

**8) Privacy**

Suppliers are committed to protecting the reasonable privacy expectations of personal information of everyone they do business with, including suppliers, customers, consumers and employees. Suppliers are to comply with privacy and information security laws and regulatory requirements when personal information is collected, stored, processed, transmitted, and shared.

## **E. MANAGEMENT SYSTEM**

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Suppliers shall adopt or establish a system to manage the elements of this Code. The management system shall be designed to ensure (a) compliance with applicable laws, regulations and customer requirements related to the Supplier's operations, products and/or services; (b) conformance with this Code; and (c) identification and mitigation of risks related to this Code. It should also be designed to facilitate continual improvement in the business's social and environmental performance.

The management system should contain the following elements:

**1) Company Commitment**

Corporate social and environmental responsibility policy statements affirming Supplier's commitment to compliance and continual improvement, endorsed by executive management and posted in the Supplier's facility (where applicable) in the local language.

**2) Management Accountability and Responsibility**

The Supplier clearly identifies senior executive and company representative[s] responsible for ensuring implementation of the management systems and associated programs. Senior management reviews the status of the management system on a regular basis.

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<sup>2</sup> Whistleblower definition: Any person who makes a disclosure about improper conduct by an employee or officer of a company, or by a public official or official body.

- 3) Legal and Customer Requirements**  
A process to identify, monitor and understand applicable laws, regulations and customer requirements, including the requirements of the HP Code.
- 4) Risk Assessment and Risk Management**  
A process to identify the legal compliance, environmental, health and safety<sup>3</sup> and labor practice and ethics risks associated with Supplier's operations. Determination of the relative significance for each risk and implementation of appropriate procedural and physical controls to control the identified risks and ensure regulatory compliance.
- 5) Improvement Objectives**  
Written performance objectives, targets and implementation plans to improve the Supplier's social and environmental performance, including a periodic assessment of Supplier's performance in achieving those objectives.
- 6) Training**  
Programs for training managers and workers to implement Supplier's policies, procedures and improvement objectives and to meet applicable legal and regulatory requirements.
- 7) Communication**  
Process for communicating clear and accurate information about Supplier's policies, practices, expectations and performance to workers, suppliers and customers.
- 8) Worker Feedback and Participation**  
Ongoing processes to assess employees' understanding of and obtain feedback on practices and conditions covered by this Code and to foster continuous improvement.
- 9) Audits and Assessments**  
Periodic self-evaluations to ensure conformity to legal and regulatory requirements, the content of this Code and customer contractual requirements related to social and environmental responsibility.
- 10) Corrective Action Process**  
Process for timely correction of deficiencies identified by internal or external assessments, inspections, investigations and reviews.
- 11) Documentation and Records**  
Processes and controls to ensure accurate books and records, and creation and maintenance of documents and records to ensure regulatory compliance and conformity to company requirements along with appropriate confidentiality to protect privacy.
- 12) Supplier Responsibility**  
Process to communicate the HP Code requirements to next-tier suppliers and to monitor compliance to this Code.

## REFERENCES

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The following standards were used in preparing this Code and may be a useful source of additional information.

Dodd-Frank Wall Street Reform and Consumer Protection Act  
<http://www.sec.gov/about/laws/wallstreetreform-cpa.pdf>

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<sup>3</sup> Areas to be included in a risk assessment for environmental health and safety are production areas, warehouse and storage facilities, plant/facilities support equipment, laboratories and test areas, sanitation facilities (bathrooms), kitchen/cafeteria and worker housing/dormitories.

Eco Management & Audit System

[www.quality.co.uk/emas.htm](http://www.quality.co.uk/emas.htm)

Ethical Trading Initiative

[www.ethicaltrade.org/](http://www.ethicaltrade.org/)

ILO Code of Practice in Safety and Health

[www.ilo.org/public/english/protection/safework/cops/english/download/e000013.pdf](http://www.ilo.org/public/english/protection/safework/cops/english/download/e000013.pdf)

ILO International Labor Standards

[www.ilo.org/public/english/standards/norm/](http://www.ilo.org/public/english/standards/norm/)

ISO 14001

<http://www.iso.org/iso/home/standards/management-standards/iso14000.htm>

National Fire Protection Association

[http://www.nfpa.org/aboutthecodes/list\\_of\\_codes\\_and\\_standards.asp](http://www.nfpa.org/aboutthecodes/list_of_codes_and_standards.asp)

OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas

[http://www.oecd.org/document/36/0,3746,en\\_2649\\_34889\\_44307940\\_1\\_1\\_1\\_1,00.html](http://www.oecd.org/document/36/0,3746,en_2649_34889_44307940_1_1_1_1,00.html)

OECD Guidelines for Multinational Enterprises

<http://www.oecd.org/corporate/mne/>

OHSAS 18001

[www.bsi-global.com/index.xalter](http://www.bsi-global.com/index.xalter)

Universal Declaration of Human Rights

[www.un.org/Overview/rights.html](http://www.un.org/Overview/rights.html)

United Nations Convention Against Corruption

<http://www.unodc.org/unodc/en/treaties/CAC/>

United Nations Global Compact

[www.unglobalcompact.org](http://www.unglobalcompact.org)

United States Federal Acquisition Regulation

[www.acquisition.gov/far/](http://www.acquisition.gov/far/)

SA 8000

<http://sa-intl.org/index.cfm?fuseaction=Page.ViewPage&PageID=937>

SAI

<http://www.sa-intl.org>



## **DOCUMENT HISTORY**

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Version 1.0 - Released October 2004.

Version 1.1 - Released May 2005. Converted document to EICC format, minor page layout revisions; no content changes.

Version 2.0 - Released October 2005 with revisions to multiple provisions.

Version 3.01 – Released June 2009 with revisions to multiple provisions. Renamed HP Electronic Industry Code of Conduct.

Version 4.01 Released June 2012 with updates for consistency with the EICC version 4.0.

Version 4.02 Released November 2014 with revision to A.1) Freely Chosen Employment provision.

Version 5.0 – Released April 2015 with updates for:

Consistency with EICC revision 5.0 including updates to the following provisions:

- A1 Freely Chosen Employment
- A2 Young Workers
- A3 Working Hours
- A4 Wages and Benefits
- A6 Non-discrimination
- A7 Freedom of Association
- B1 Occupational Safety
- B2 Emergency Preparedness
- B4 Industrial Hygiene
- C2 Pollution Prevention and Resource Reduction
- C4 Wastewater and Solid Waste
- C5 Air Emissions
- C6 Materials Restrictions
- D1 Business Integrity
- D2 No Improper Advantage
- D3 Disclosure of Information
- D4 Intellectual Property
- D6 Protection of Identity and Non-Retaliation
- D7 Responsible Sourcing of Minerals
- E1 Company Commitment
- E2 Management Accountability and Responsibility
- E4 Risk Assessment and Risk Management
- E11 Documentation and Records

Addition of new provisions

- B8 Health and Safety Communication
- C7 Storm Water Management
- C8 Energy Consumption and Greenhouse Gas Emissions

Other updates to Objective, Scope, Policy and introductory language for each of the five Code sections.

Renamed Code “HP Supplier Code of Conduct”.