

U.S. Public Sector Code of Conduct



STATEMENT OF POLICY

HP recognizes that many complex rules govern our business activities when the end user of our products or services is a U.S. federal, state or local government entity, or educational institution. In this marketplace, even the appearance of impropriety can be the basis for protests, governmental inquiries, or the loss of HP's ability to conduct government business. We comply with all laws and regulations applicable to government contractors and sometimes set HP's policies at even higher standards.

When conducting business with the U.S. public sector, whether it is directly with the government or through a third party, you must understand the requirements the government has established for itself and those who bid on and receive government contracts and subcontracts. In addition to complying with all applicable laws and regulations, all employees must abide by the HP Standards of Business Conduct (SBC), the U.S. Public Sector Code of Conduct, all policies within the HP U.S. Public Sector Compliance Manual, and the terms of the HP contracts, including those with government customers.

GUIDELINES

Gifts, Bribes, Gratuities, and Kickbacks

You may not offer, give or promise to give, directly or indirectly, an employee of the U.S. federal government, U.S. state/local government, or public higher education institution, or to any public or private K-12 educational institution, or library, anything of value—including gifts, meals, entertainment or travel—unless the recipient pays its fair market value. The prohibition on gifts to private or public K-12 educational institutions and libraries includes those entities' board members, employees, officers, representatives, agents, consultants, or independent contractors. You also may not offer, give, solicit, or receive any gift or other thing of value (directly or indirectly) to or from one of these entities in exchange for favorable treatment or advantage, or for the purpose of obtaining, or attempting to influence the award of a contract or subcontract. See: U.S. Business Amenities.



Procurement Integrity

You may not knowingly obtain or attempt to obtain another contractor's bid or proposal information or the government's source selection information before the award of a government contract to which the information relates. Nor may you attempt to influence an ongoing source selection by means other than the bid and proposal process. The U.S. Procurement Integrity Act specifically prohibits any contractor from soliciting or obtaining certain nonpublic bid proposal, cost and pricing, and source selection information. This act and various state and local variations also impose additional requirements on the management of certain information relating to government procurements. Also, you may not attempt to acquire another company's or person's proprietary information either from the government or private entities unless the government or other entity has been authorized to disclose it to you. See: Antitrust Basics and Procurement Integrity.

Hiring Government Employees

Due to the wide range of laws and regulations that govern the hiring of former government employees, you may not enter into employment discussions with current or former government employees meeting the criteria of a *Covered Government Official* until they have been pre-screened by the U.S. Public Sector Compliance Office. Prospective applicants who have worked for the federal or state/local government within the last five years and meet the criteria of a *Covered Government Official* must provide HP with answers to a special employment questionnaire. This questionnaire will allow the U.S. Public Sector Compliance Office to provide you with instructions about any limitations you need to observe before having any employment discussions. Under no circumstances may you have employment discussions with government officials involved in a pending



procurement in which HP is participating. See: Hiring Current and Former Government Employees.

Organizational Conflicts of Interest

In addition to avoiding personal conflicts of interest with the Company's business, you must comply with the rules governing organizational conflicts of interest (OCI) applicable to government contractors and subcontractors. Under these rules, HP may be disqualified from certain present or future business opportunities if HP would obtain an unfair competitive advantage over other offerors; be in a position to unfairly bias government action in HP's favor; or unable to render objectively impartial advice. For example, HP may be precluded from bidding on future work for that agency if HP had access to other potential offerors' proprietary information; prepared the specifications governing the specifications governing the future procurement or was placed in a position to evaluate HP's own performance; or could not render objectively impartial advice. You should become familiar with applicable OCI rules and, if you have questions, consult with Contracts, Legal or U.S. Public Sector Compliance. See: Conflicts of Interest and Organizational Conflicts of Interest.

Consultants

Federal, state, or local laws may require disclosure of, and place limits on payments to, consultants, representatives, lobbyists, or other third parties in dealings with the government. For example, an arrangement to pay a fee for soliciting or obtaining government contracts may be prohibited by law. All consultants hired by HP are bound by the same laws and regulations as are HP employees, and use of a consultant will not insulate HP or its employees from liability for violations of these rules. You may never ask or allow a third party to do something on HP's behalf that you are prohibited from doing yourself. See: Global Business Amenities and Consultants.



False Statements/False Claims

You should never knowingly make a false statement or submit a false claim to the government. This includes the submission of inaccurate or misleading information in support of prices offered by HP to the government, the submission of improper invoices, or inaccurate or misleading representations or certifications, either to a government representative or a prime contractor when the end user is the government. See: False Statements/False Claims.

Timekeeping and Expense Reporting

You are required to maintain accurate and complete records of transactions, including time reports, expense accounts, and other company records. When time and expense reports will be used as the basis for invoicing to our government customers or prime contractors, failure to provide accurate information can be the basis for false claims or false statements liability. All time, expenses, and other charges must be documented accurately and completely, and charged to the correct account. See: AFM and Timekeeping and Expense Reporting.



Product Substitution

All deliveries under HP's government contracts and subcontracts must conform to contract requirements. Nonconforming products or services may not be delivered unless the customer is fully aware of the nonconforming situation and agrees in writing to accept the delivery of the nonconforming goods and services. Similarly, all invoices should accurately reflect what has been ordered by and delivered to the customer, consistent with the terms of the contract. For example, if the contract requires certain credentials of workers performing a certain service, you may not provide workers who do not meet those standards and bill for them as if they do. See: Product Substitution.

Protection of Sensitive Information

Information is one of HP's greatest assets and safeguarding it is key to our success and maintaining the trust of our customers. You must practice security behaviors that prevent information leaks and protect HP and our clients. HP's ability to protect classified and other types of sensitive information depends on you. Disclosure of company, client, or employee sensitive information—whether intentional or negligent—violates the SBC and can lead to disciplinary action. See: Protecting Classified Information, Controlled Unclassified Information, and Confidential Information.



BACKGROUND AND INFORMATION

Questionable situations must be reported immediately to the Corporate Ethics & Compliance Office or the U.S. Public Sector Compliance Office. If you wish to maintain confidentiality, you may write to the Hewlett-Packard Ethics and Compliance Office, 3000 Hanover Street, Mailstop 1050, Palo Alto, CA, 94304 or call The GuideLine at 1-800-424-2965.

Violations of this policy are grounds for disciplinary action, up to and including dismissal. Disciplinary action will be taken against those who authorize or participate in violations of this Code of Conduct, or those who deliberately fail to report violations or withhold relevant information concerning a violation.

Questions concerning this Code of Conduct should be directed to U.S. Public Sector Compliance Office.

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