



## **HP Global Charitable Contributions Policy**

### **Introduction**

HP has a long history of charitable giving and community involvement. This policy has been established to reflect company-wide considerations, processes and controls that are to be employed to ensure charitable actions are carried out with fairness and due diligence and are reflective of HP's core values and business interests.

### **Scope**

This policy establishes principles and requirements for making charitable contributions and applies to all HP employees and business units worldwide. The term "charitable contributions," as used in this policy, refers to monetary or in-kind donations, including grants, donated to a charitable organization, academic institution, or library.

As used in this policy, the term charitable contributions does not include donations made in exchange for a benefit (e.g., meals, memberships, event participation, marketing rights). "Sponsorship" refers to any arrangement whereby HP provides financial support, products, services, or anything of value to a third party (including charitable organizations), in exchange for the acquisition of rights that allows HP to associate its brand with another brand in a broad, publically visible way. The term "sponsorship" will include anything defined as such in HP's Sponsorship Policy. For example, the purchase of tables at charitable events or participation in a charity golf tournament are examples of sponsorships and are not charitable contributions.

Any sponsorship must comply with the HP's Sponsorship Policy and Anti-Corruption Policy.

### **Philosophy**

HP is a recognized multi-national corporation with a global workforce and facilities in communities worldwide. We seek to reflect our corporate values and sustainability objectives in all locales with a profound respect of all cultures and the unique social needs found country to country.

Our strategic giving programs (described in greater detail below) are defined by the Sustainability & Social Innovation team and engineered to have relevance in the countries and markets in which we are present and competing. We proactively partner with employees and organizations that can help ensure responsible engagements with those schools and organizations receiving a charitable contribution from HP.

We recognize the diversity of people, culture, and social needs. We seek to align our giving to be reflective of our brand values and to be helpful in resolving a social need and advancing our HP business and market interests.

HP organizations are encouraged to extend HP's sustainability values. This may be manifested, with the approval of requisite leadership, by locally coordinated volunteerism and giving initiatives where access and leverage of centralized funding or administrative capability does not exist.

## Policy

HP seeks to address social needs through strategic philanthropic investments that build brand equity and support HP business priorities. We align our philanthropic priorities with our business and brand objectives by investing in educational institutions and nonprofit organizations around the world that promotes learning and enrich lives.

Charitable contributions and all HP business-driven giving initiatives are to be executed within a controlled framework that mitigates risk, ensures fairness in the consideration of prospective beneficiaries, complies with applicable laws, and reflects HP values, business and social interests and the behaviors of exemplary corporate sustainability.

HP supports strategic charitable contributions, with emphasis in the areas of Education, Health and Community, and also encourages and supports programs to facilitate employee giving. These strategic giving programs are administered through the HP Sustainability & Social Innovation organization.

## Giving Practices

The HP Sustainability & Social Innovation team administers the company's charitable contributions protocols. Our charitable giving activities are reflective of the assets that HP can bring to organizations in need: specifically, monetary donations and equivalents such as HP products.

- Product giving is highly encouraged. HP products are typically procured from within the company at "cost," to allow HP the opportunity to deploy technology in the context of good sustainability, and develop brand awareness in diverse nonprofit and academic settings.
- Monetary donations remain an element of HP's giving strategy and may supplement strategic equipment grant transactions. Occasional charitable contributions that are exclusively monetary are permitted.
- Charitable contributions must be documented in writing, including the intended recipient, eligibility criteria, and payment terms.
- Charitable giving transactions must be executed and recorded according to the (1) written agreement with the recipient, and (2) financial policy reflected in Section 6590 of HP's Accounting and Finance Manual (AFM). Where possible, funds intended to purchase equipment or provide services should be paid directly to the vendor.

## Recipient Eligibility Criteria

ALL RECIPIENTS of HP charitable contributions must meet the following criteria

- All giving must be to either a 501(c)(3) organization (in the United States) or equivalent (outside of the United States), or a certified academic institution;
- The organization's primary mission is non-sectarian, non-religious, non-denominational, non-discriminatory, and non-political; and
- The organization's policies and practices are consistent with HP's non-discrimination policies and practices. HP will not make contributions, matching gift donations or product donations to organizations that discriminate on the basis of race, color, ethnicity, creed, religion, gender, gender identity and expression, national origin, sexual orientation, age, pregnancy, disability, veteran status, protected genetic information, or political affiliation.

## Restrictions on Charitable Contributions

HP cannot provide charitable contributions to:

- Individuals;
- Organizations whose primary purpose is to promote political views, influence legislation, or support candidates for public office;
- Organizations located in countries where US Trade Embargo is in place or on HP's Restricted Parties List;
- Churches, houses of worship, religious or sectarian programs for religious purposes, or religious training programs including but not limited to seminaries, theology schools, or yeshivas;
- Fraternal organizations; or
- Non-profits not currently holding a 501(c)(3) exempt status or international equivalent.

No charitable giving is to be made in a manner that would:

- Be or create the appearance of a bribe, kickback or other corrupt practice.
- Directly procure HP future business or otherwise be made with the intent to obtain or retain business, secure an improper advantage, or induce anyone to act improperly.
- Circumvent existing HP rules relating to giving business amenities highlighted in the Global Business Amenities Policy or U.S. Business Amenities Policy.
- Be inconsistent with applicable law and HP's policies, including its Anti-Corruption and Conflicts of Interest policies. Disclosure of board seats and involvement with organizations, including indirectly through a close relative or friend, that may be petitioning HP for a grant or contribution is essential to protect HP, the employee or executive, and the organization. See the HP policy Service by HP Employees as a Director or Officer of a non-HP Company.

## Additional Approvals for Public Sector Transactions

- The HP Public Sector Compliance team must approve all charitable contributions to a U.S. public sector institution or agency, including a business owned or operated by the U.S. public sector or a U.S. public or private school or library, to ensure adherence with HP's Public Sector "Code of Conduct".
- You must consult the Anti-Corruption Office before agreeing to donate to a charitable organization, public or private school, or a public-sector institution or agency, in connection with any public-sector sales promotion, tender, or bid scenario.
- The Anti-Corruption Office must also approve all charitable contributions, if a government official has, or may have, an interest, directly or indirectly, in the organization.
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## Charitable Contributions Valued at \$10,000 or Greater

In addition to the requirements above, charitable contributions valued at \$10,000 USD or greater, regardless of HP funding source, must be approved by the Sustainability & Social Innovation to ensure

proper recipient engagement, legal vetting, and tax documentation are adequately developed and completed.

- Grant Making procedures require due diligence of a potential grantee or recipient be completed PRIOR to announcing an intention to give.
- At least a vice president-level executive must complete and submit an Anti-Corruption Checklist Certification to the Human Resources Organization's Grant Administrator.

See Grant Making Process website for additional information regarding the due diligence and approval procedures. If a grant proposal is being made valued at \$10,000 or greater, that proposal must include:

- A proposal from a grantee with clear goals and success measurement criteria.
- Signed (electronically through the HP Human Resources Organization) Terms and Conditions for the grant or contribution.
- A confirmation of receipt once goods or monetary donations are received.
- Written acknowledgment on file from the recipient organization to be claimed as a tax deduction in the United States.
- All appropriate detail associated with a grantee or recipient organization: names, address, tax identification status confirmation, and other information.

### **Charitable Contributions Valued Less Than \$10,000 USD**

Charitable contributions with values less than \$10,000 USD may be made by any HP organization and do not require approval from the Corporate Affairs Organization. Such charitable contributions, however, must be consistent with the principles contained within this Policy.

Employees within the HP organization must retain the related documentation according to HP Record Retention policy. All U.S. grants of \$250 or more are required to have a written acknowledgment on file from the recipient organization to be claimed as a tax deduction in the United States.

### **Strategic Giving Programs**

HP's charitable contributions and grant making activities within its strategic giving programs, as defined and coordinated by the HP Sustainability & Social Innovation team seek to maximize the impact of our philanthropy by developing global programs that showcase HP technology in a solutions-oriented context. These programs are developed in conjunction with HP business organizations to align strategic giving initiatives with areas of market and technological interest.

Strategic grant initiatives are developed and announced annually, often with a Request for Proposal message soliciting requests from schools and organizations related to a theme, such as advancing the process of teaching, community engagement, and so forth.

The proposals are reviewed by neutral third parties or by employees to ensure fairness in the recommendation of winners.

All strategic giving programs are coordinated by the HP Sustainability & Social Innovation organization. in collaboration with Business Unit and or Global Function leadership.

## **Employee Giving Programs**

HP provides resources to match employee giving. Each fiscal year an Employee Cash Giving program is funded by the HP Company Foundation. This is a first come, first served model, coordinated through an external service provider specializing in cash-based charitable transactions. The program is launched at the beginning of the fiscal year and is available as long as funds are available.

## **Business Unit Used Equipment Grants**

The Sustainability & Social Innovation team realizes that certain HP businesses may have access to used HP and non-HP equipment, that is no longer of value to HP and could be of use to qualified recipient organizations. As such, despite HP not being able to recognize the same tax and reporting benefits associated with granting new HP equipment, used HP and non-HP equipment may be granted in accordance with the requirements set in the Used HP Product and Used Non-HP Product.

## **Reporting**

HP reports its global charitable and citizenship activities each year in the form of a HP Sustainability Report. The report is a critical element, leveraged worldwide, in the messaging of our sustainability and giving profile. It reflects the company's total giving activity, which is derived from a centralized data and grant administration repository managed by the HP Sustainability & Social Innovation organization. It is in HP's best interest to have all giving activity captured centrally, to accurately and fully reflect the rate of contributions activity and social goodwill that HP manifests annually.

Additionally, centrally capturing all charitable contributions information allows our HP sales, marketing and executive teams to have access to information related to HP's activity in given regions, countries, cities and organizations – and to what financial extent. Often this information is essential in developing new business relationships, particularly in new market areas.

## **The HP Company Foundation**

The HP Company Foundation is a distinct legal entity unto itself and is not a discretionary resource for HP's philanthropic pursuits.