HPE GLOBAL HUMAN RIGHTS POLICY
PURPOSE

“Respecting human rights is a core value at HPE and is embedded in the way we do business.”

– Antonio Neri, President and CEO

We have a responsibility to demonstrate this core value by embedding human rights standards, principles, and best practices in the way we do business. Investing in ethical practices while delivering financial results is a responsibility HPE takes seriously.

Human rights are the fundamental rights, freedoms, and standards of treatment to which all people are entitled. HPE upholds and respects human rights as defined by the United Nations Universal Declaration of Human Rights (UDHR) through our commitment to upholding the United Nations Guiding Principles on Business and Human Rights (UNGPs); the UN Global Compact; the International Labour Organization (ILO) eight core conventions (covering Fundamental Principles and Rights at Work, including forced labor, child labor, freedom of association—right to organize and collective bargaining, and discrimination); and the Convention on the Rights of the Child. Other influential international initiatives, such as the OECD Guidelines for Multinational Enterprises, International Covenant on Social and Cultural Rights, and International Covenant on Civil and Political Rights inform our approach.
SCOPE

This Policy focuses on our commitment to leading human rights standards, explaining our overall approach to managing and respecting human rights in our operations and value chain, and detailing and highlighting our salient human rights risks. We expect our sales partners and suppliers to share our commitment to protecting human rights.

POLICY

Through HPE’s commitment to the UNGPs and leadership in integrating respect for human rights worldwide into our operations and value chain, HPE seeks to avoid causing or contributing to actual or potential adverse human rights impacts through our own operations and that of our business partners.

We approach human rights due diligence with a risk-based approach and partner with relevant stakeholders across the company to operationalize this policy. Our programs and engagement focus on our most salient risks. We continuously review these risks, solicit stakeholder input, and prioritize risks that could contribute to greater impact or disproportionately affect vulnerable individuals. Our six salient risks are responsible use, responsible product development, modern slavery and decent work, responsible minerals, inclusion & diversity, and water use, as highlighted in Figure 1.

These risks relate to protecting human rights to dignity (UDHR article 1), non-discrimination (UDHR article 2), freedom from modern slavery (UDHR article 4), privacy (UDHR article 12), and freedom of expression (UDHR article 19).
OUR COMMITMENT

In light of our recognition of global standards above, HPE commits to:

• Demonstrate our respect for the human rights of all individuals in our value chain and where we live and work, with particular concern for identifying, understanding, and reducing risk of negative impact to those most vulnerable (including migrant workers, children and youth, dispatch workers, female and LGBTQI+ persons, ethnic minorities, and human rights defenders).

• Comply with laws and regulations where HPE does business, and adopt and apply international standards (referenced above) where laws are less stringent.

• Complete due diligence to avoid complicity in human rights violations. Our due diligence process includes:
  – Assessing specific human rights risks and potential impacts.
  – Implementing processes and screenings for specific transactions such as sales, new suppliers and acquisitions and investments which risk a contribution or linkage to potential human rights violations. Our risk assessment considers geography (based on independent expert risk indices), product (with heightened attention on artificial intelligence and surveillance-enabling technology), customer past performance or allegations, and purpose of use.
  – Providing human rights impact assessments to the business, our partners, and senior leaders, in addition to recommendations and/or guidance on preventing and mitigation of risk.
  – Applying our processes for identifying, assessing, and avoiding or mitigating activities with heightened risk and potential impact, and prioritizing areas where potential harm could be most probable, severe, widespread, and irremediable.
  – Promptly investigating allegations and pursuing action to remedy and mitigate any adverse human rights impacts.

1 We apply the UN’s definition of human rights defenders as people who, individually or with others, act to promote or protect human rights.
• Provide uninterrupted access to independent grievance mechanisms so any stakeholder can easily and quickly raise concerns, report potential adverse human rights impacts, or seek remedy.
  – Evaluate grievance effectiveness and seek improvements to ensure channels remain effective, accessible, and trusted.\(^2\)
  – Communicate that threats, intimidation, and physical or other attacks against individuals, including those advocating for working conditions in the supply chain, are unacceptable.
  – Maintain processes for escalating, investigating, and remedying critical findings in our own operations and that of our suppliers and other partners, with input from affected stakeholders such as workers. We engage our business partners and encourage them to implement the same processes.
  – Support remedy of any actual adverse impacts that may occur, whether wholly or in part due to our actions or inactions. HPE seeks to apply leverage and encourage responsible parties to assess conditions and implement corrective actions, even in circumstances where HPE is not directly linked to an identified adverse impact. We take action to influence any adverse impacts that may be linked to us and engage with peers and other partners on collective remedy, including collaboration with suppliers.

• Engage stakeholders on how to effectively reach the aims of our policy, to inform our key risks and implement best practice in our program activities.
  – We seek feedback from individuals and representatives potentially or actually impacted on areas of heightened risk or concern, and incorporate such stakeholder feedback into our programmatic activities, priorities, and risk assessments. For example, when we have caused or contributed to actual harm in our business or supply chain, we commit to working with representatives and human rights defenders to inform and improve our approach and enable safe environments for raising concerns.
  – Our human rights stakeholders include human rights and topical experts, workers, suppliers, community members, government, civil society, multi-stakeholder, and membership groups. We identify potentially affected stakeholders and their representatives based on those who work in our salient risk areas as well as those who promote best practice on human rights related to groups we have identified as most vulnerable.
  – Workers in our supply chain remain a key stakeholder, and as such we engage and welcome feedback from workers and suppliers on a continuous basis. We extend our third-party hotline to suppliers and their workers, and make it available only for any individual or community member to access.

• Evaluate our programs, improve policies and standards that advance human rights, and better understand risks and practices through a journey of cumulative progress, including through the following efforts:
  – Promote and support continuous improvement through capability building for our business partners, terminating relationships only as a last resort.
  – Track and measure our human rights program effectiveness and impact, including effectiveness of individual HRIA, actions taken and impact of improvement and remediation on workers and other potential or affected stakeholders.
  – Assess our overall programmatic impact and stakeholder feedback, and report to management at least annually, and improve our policy, processes, membership, and accountability as needed.
  – Report transparently on our efforts and challenges.

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\(^2\) We ensure easy access for any individual to raise a concern through our third-party managed hotline, available 24 hours a day, 7 days a week in any language, with an option to raise an issue anonymously. HPE prohibits the use of retaliation of any form, and as appropriate cooperate—and not obstruct—remedy through judicial and non-judicial mechanisms. We also benefit from additional third-party channels including those managed by RBA and RMI.
SALIENT HUMAN RIGHTS RISKS

Our work is organized around our six salient human rights risks, which we have identified through our third-party company-wide human rights impact assessment and regular internal review:

1. Responsible Use

Innovative technologies have the power to disrupt industries and create significant solutions for some of the world’s toughest problems. However, if such technologies are misused, new challenges arise. HPE seeks to understand where and how our products could be deployed in unethical ways, and work throughout our company and partnerships to raise awareness of human rights, provide training and guidance, screen and assess transactions with potential human rights risk, and promote responsible use.

2. Responsible Product Development

HPE manages processes to identify potential new products that could increase risks, and we seek to understand and mitigate those risks prior to and during product development by engaging our engineers and involving them in our risk analysis. We continue to design and refine formulaic processes for carrying out due diligence in responsible product design, particularly through our AI Ethics Advisory Board, AI Principles and supporting screenings and assessment related to artificial intelligence.

3. Modern Slavery and Decent Work

HPE recognizes that eliminating forced labor from supply chains requires innovation and collaboration, and as such remains committed to researching root causes, developing innovative tools and approaches, and openly engaging in collaboration with peers, suppliers, civil society, and other stakeholders. Through our commitment to the ILO Core Conventions, HPE actively monitors and enforces decent work in our own operations and that of our suppliers. We prohibit any form of child and forced labor, and expect our suppliers to share our commitment to carry out effective due diligence, including age verification checks for all workers. Should a case of child labor be identified, we have stringent internal procedures applicable to our own operations and that of our staff, which includes immediate transfer of a child to their guardian, access to education and support, and checks such as age verification systems.

We commit to the Employer Pays Principle, and actively monitor and work along our supply chain to ensure workers do not pay recruitment fees. Where fees are identified, we require suppliers to work closely with us to investigate the extent of fees, develop an HPE-approved reimbursement plan, ensure worker voice throughout, engage in monitoring, develop a plan for improving systems for detecting and preventing future instances and carry out a closure audit.
Worker input and voice is a key feature of our effectiveness in preventing and improving nonconformances. We seek to ensure our suppliers share this approach by actively promoting the benefits of worker voice and assessing the effectiveness of suppliers’ grievance mechanisms and extending channels for raising concerns through third parties.

We regularly work with suppliers throughout the year to survey and engage workers, both proactively to improve understanding of worker needs, to monitor supplier improvements, and to ensure workers are aware of their rights and our standards. Our Approach provides a detailed description of how our commitment to respect human rights is applied to our supply chain operations.

4. Responsible Sourcing of Minerals

We have a responsibility to ensure that the materials used to make HPE products—including metals found in most technology products such as tin, tantalum, tungsten, and gold—are ethically sourced. The mining, sale, and use of minerals from Conflict-Affected and High-Risk Areas (CAHRAs) has been associated with negative social and environmental impacts, including the funding of violent groups who commit human rights offenses. Through our responsible minerals program, we work to advance the responsible sourcing of minerals from CAHRAs used in our products.

We strive to improve the transparency of mineral sourcing within our supply chain and achieve DRC conflict-free sourcing for our products. Ultimately, we aim to improve conditions in CAHRAs identified by the presence of armed conflict, widespread violence, or other human rights abuses.

5. Inclusion & Diversity

HPE drives business impact and market differentiation by investing in diverse talent and advancing inclusion across our value chain. We are unconditionally inclusive in the way we work and celebrate individuality.

Inclusion & diversity are factored into how we identify and prioritize human rights risks. In line with our commitment to the UNGPs, we carry out additional due diligence in areas of our supply chain that may impact vulnerable groups we have identified, including migrant workers, children, youth and students, women, and ethnic minorities.

6. Water Use

HPE believes access to clean water is a fundamental human right. We work to align our water strategy with broader global sustainability frameworks, such as the UN Sustainable Development Goals, to help ensure the availability of clean water for future generations.
SUPPORTING POLICIES

HPE’s key policies that further support our commitment to respect human rights are:

• Standards of Business Conduct
• Nondiscrimination Policy
• Harassment-Free Work Environment Policy
• HPE Open Door Policy
• HPE Supplier Code of Conduct
• HPE Partner Code of Conduct
• Contingent Worker Code of Conduct
• HPE AI Ethics & Principles
• HPE Global Privacy Policy
• Anti-Corruption Policy
• Environmental, Health, and Safety Policy
• Supplier SER Requirements
• HPE Water Policy

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