



HPE GLOBAL HUMAN RIGHTS POLICY

Purpose

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

Organization:

Ethics and Compliance Office

Policy number:

HPE001-03

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 Responsible Business Association (RBA) Code of Conduct; the International Labour Organization (ILO) eight core conventions (covering [Fundamental Principles and Rights at Work | International Labour Organization](#), including forced labor, child labor, freedom of association—right to organize and collective bargaining, discrimination, and health and safety) and the [Convention on the Rights of the Child](#). Other influential international initiatives, such as the [OECD Guidelines for Multinational Enterprises](#), [International Covenant on Civil and Political Rights](#), and [the Children’s Rights and Business Principles](#) inform our approach.

Scope

This Policy focuses on our commitment to leading human rights standards, explaining our overall strategy and approach to managing and respecting human rights in our operations and value chain, and detailing and highlighting our salient human rights risks. We require 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 and supply chain.



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, disproportionately affect vulnerable individuals, or where risk of adverse impact is more probable to occur. Our six salient risks are responsible use, responsible product development, modern slavery and decent work, responsible minerals sourcing, respect for everyone in our value chain, and clean and healthy environment, as highlighted in Figure 1.

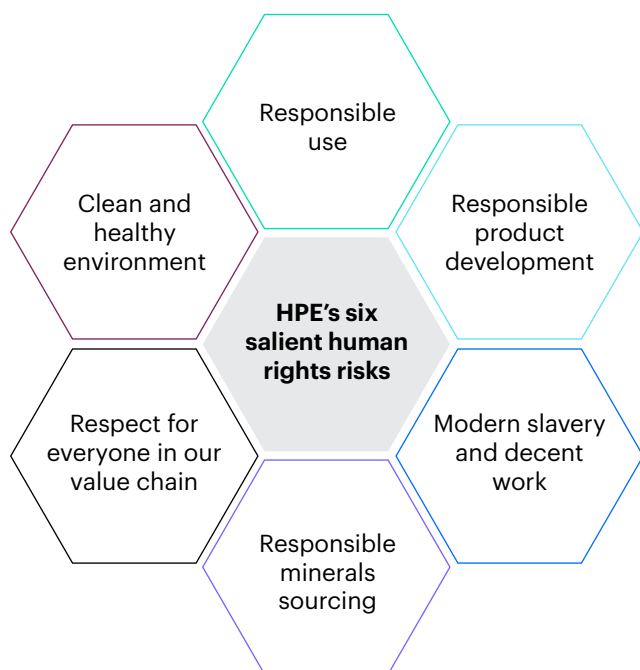


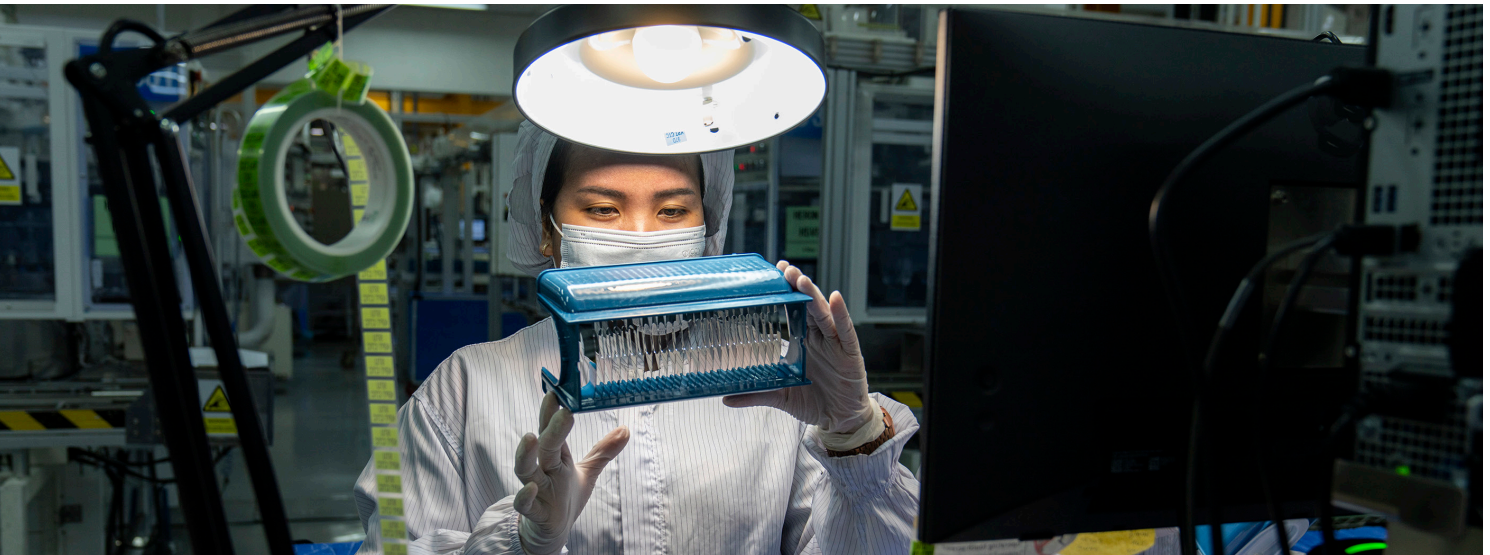
Figure 1. HPE's six salient human rights risks

These risks relate to protecting all human rights including the right 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

Based on the standards and initiatives noted 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 to those impacts.
- 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 or prohibitions and to identify risks within our operations, and that of our business partners and supply chain. Our due diligence process includes:
 - identifying and assessing actual and potential adverse impacts on human rights.
 - 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. We look to identify groups who are most vulnerable to harm and execute heightened human rights due diligence to mitigate these risks.
- applying our processes for identifying and assessing activities with heightened risk and potential impact, and prioritizing areas where potential harm could be most probable, severe, widespread, and irremediable. We execute heightened human rights due diligence when changes in the operating context occur, such as a new conflict beginning in a specific geography where we have a notable presence. We review our local footprint such as recent sales and local presence, and where there's potential for human rights risk and a need for heightened due diligence. We leverage country risk metrics and carry out heightened human rights due diligence when human rights risks are elevated.
- in response (and where necessary), implementing appropriate measures to cease, prevent or mitigate any actual and potential adverse impacts on human rights. This includes promptly investigating allegations and pursuing action to remedy and mitigate any adverse human rights impacts.
- 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. This includes:
 - Evaluate grievance effectiveness and seek improvements to ensure channels remain effective, accessible, and trusted.
 - 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.
- Require suppliers in our supply chain to understand and comply with certain requirements to advance human rights responsibility within their organization and supply chain and to reflect our policy, standards, and expectations and the nature of our Supplier’s operations.
- 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 identify a cause or contribution 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.¹
 - 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.
- Annually, evaluate and review our programs, improve policies and standards that advance human rights, and better understand risks and practices, and effectiveness through a journey of cumulative progress, including through the following efforts:
 - Promoting and supporting continuous improvement through capability building for our business partners, taking remedial action as required, and terminating relationships only as a last resort.
 - Tracking and measuring our human rights program effectiveness and impact, including the effectiveness of individual human rights impact assessments, actions taken and subsequent results, and the impact of improvement and remediation on workers and other potential or affected stakeholders.
 - Assessing our overall programmatic impact and stakeholder feedback, and reporting to management at least annually, and improving our policy, processes, membership, and accountability as needed.
 - Embedding responsible business conduct into our policies and standards.
 - Reporting and informing transparently on our efforts, performance and challenges.
- 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.

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.

Salient Human Rights Risks

Our work is organized around our six salient human rights risks, which we identify through our regular third-party company-wide human rights impact assessments, stakeholder input, and regular internal reviews:

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. We must consider who wishes to purchase our products and how they will use them, and promote deployment with safeguards to prevent unintended harm. HPE seeks to understand where and how our products could be deployed in unethical ways. We 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 and services 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 executive-level Artificial Intelligence (AI) Oversight Committee and its AI Ethics Responsibility Committee, AI Principles and supporting screenings and assessment related to artificial intelligence.

Our AI Ethics Working Group implements assessments of AI solutions being leveraged internally and externally. In the assessments we consider how HPE products and services making up AI solutions can impact people with a particular focus on groups with greater vulnerability such as children. This includes discussing options related to responsible use and risk mitigation for solutions that come into contact with vulnerable groups.

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 violations including 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 rollout of robust due diligence 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 forced labor is identified, we require suppliers to work closely with us to investigate the extent of the non-conformance. In the case of fees, suppliers engage with us to 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 support our suppliers to share this approach by providing worker engagement tools, actively promoting the benefits of worker voice and assessing the effectiveness of suppliers' grievance mechanisms, and extending our channels for raising concerns through third parties.

We regularly work with suppliers throughout the year to survey and engage workers, to 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 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, gold, and cobalt—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 also monitor human rights risks in countries beyond the CAHRA list, working with our direct suppliers to apply leverage, understand and contribute to efforts that address root causes, and remove smelters where necessary.

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. Respect for Everyone in our Value Chain

HPE demonstrates 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 the risk of negative impact to those most vulnerable to those impacts.

Inclusion and non-discrimination are factored into how we identify and prioritize human rights risks. In line with our commitment to the UNGPs and our [Commitment to Respect the Rights of Marginalized Groups](#), we carry out additional due diligence across our value chain to identify when human rights of vulnerable groups are particularly at risk. This includes all human rights impact assessments conducted across the business, as well as AI ethics assessments.

6. Clean and Healthy Environment

HPE believes in a clean and healthy environment for all. HPE seeks to better understand the human impact of environmental harm and how to identify and mitigate risks across the entire value chain. We continuously monitor these human rights risks and perform thorough due diligence to avoid potential involvement in human rights violations. Climate change will disproportionately affect vulnerable groups. We aim to ensure human rights considerations are included in our sustainability strategy. In particular, 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. We work across HPE to review risks of our sustainability pursuits resulting in unintended impact on people. As a result, we are ensuring our efforts to achieve environmental progress assess and mitigate potential negative impact on people.

Supporting Policies and Documents

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

- [Anti-Corruption Policy](#)
- [Commitment to Respect the Rights of Marginalized Groups](#)
- [Contingent Worker Code of Conduct](#)
- [Environmental, Health, and Safety \(EHS\) Policy](#)
- [Harassment-Free Work Environment Policy](#)
- [AI Ethics Principles](#)
- [HPE Global Privacy Policy](#)
- [HPE Open Door Policy](#)
- [HPE Partner Code of Conduct](#)
- [HPE Supplier Code of Conduct](#)
- [HPE Water Policy](#)
- [Nondiscrimination Policy](#)
- [Standards of Business Conduct](#)
- [Supplier SER Requirements](#)



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