

# OUR STANDARDS OF BUSINESS CONDUCT

BUILDING TRUST TOGETHER

## **Our shared values**

Passion for customers  
Trust and respect for individuals  
Achievement and contribution  
Results through teamwork  
Speed and agility  
Meaningful innovation  
Uncompromising integrity

## **Our corporate objectives**

Customer loyalty  
Profit  
Growth  
Market leadership  
Commitment to employees  
Leadership capability  
Global citizenship



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SINCE BILL HEWLETT AND DAVE PACKARD  
STARTED OUR COMPANY MANY YEARS AGO, HP HAS  
BEEN KNOWN NOT JUST FOR THE PRODUCTS  
AND SERVICES WE OFFER BUT ALSO FOR THE  
VALUES WE SHARE.

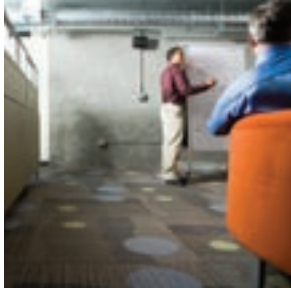


WE WANT TO BE A COMPANY KNOWN FOR  
ITS ETHICAL LEADERSHIP—A COMPANY WHERE  
EMPLOYEES ARE PROUD TO WORK, A COMPANY  
WITH WHICH CUSTOMERS, BUSINESS PARTNERS, AND  
SUPPLIERS WANT TO DO BUSINESS.





**We gain trust by treating others with integrity, respect, and fairness. We must continue to demonstrate these values every day and in all our interactions, one day at a time.**



## A MESSAGE FROM ASHLEY WATSON

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Dear fellow Hewlett-Packard employee:

The SBC continues to be a key resource and guide to Ethics and Compliance information at HP.

Throughout the SBC you will find helpful links to questions and answers, key tips, and red flags to assist you in applying our SBC to situations you may encounter. This format will allow us to update our SBC and add to the links as necessary to ensure that the SBC has the latest guidance and remains timely and relevant.

You will also find that every section of our SBC contains links to corporate policies and other supporting documents. These links are important. Our SBC cannot contain every policy that is relevant in every country and for every employee. Remember that in addition to the guidance contained in our SBC, there are many other policies and rules that must be followed and will continue to be enforced. If you have ethical concerns or questions about the right thing to do, please raise them with your management or contact the Ethics and Compliance Office.

Ashley Watson

Chief Ethics and Compliance Officer

# USING OUR STANDARDS OF BUSINESS CONDUCT



**HP will not tolerate retaliation against anyone who raises a concern or question in good faith.**

keys to success, red flags, questions and answers, and scenarios.

Because HP is committed to getting things done the right way, violations of our SBC or HP policies or rules may result in disciplinary action, up to and including termination of employment.

When concerns or questions come up, communicating at the local level, either peer-to-peer or with your manager, is often the best place to start. When it is not possible to raise or resolve an issue with your immediate manager, use the open door policy to contact the next level of management, Human Resources, or the Ethics and Compliance Office at: [corporate.compliance@hp.com](mailto:corporate.compliance@hp.com) or by phone through the GuideLine (24 hours a day, translation available, callers can remain anonymous)—from the U.S. and Canada, dial 800-424-2965, or from outside the U.S. and Canada, 1) go to <http://www.business.att.com/bt/access.jsp>; 2) find your country in the alphabetical listing; 3) dial the AT&T Direct® Code; and 4) when prompted, dial 800-424-2965. Or you may send a letter via postal mail to: HP Ethics and Compliance Office, 5400 Legacy Drive, Plano, TX 75024 USA.

Our Standards of Business Conduct (SBC) is a resource for employees and all those who represent HP. All employees and members of the Board of Directors are required to act consistently with our SBC.

Our SBC is based on HP shared values and corporate objectives, and represents the highest level of guidance. There are additional rules and specific policies that are to be followed and enforced within HP. As the diagram illustrates, the additional information, including relevant corporate policies, may be found in links throughout the document. There is also other guidance in the form of

# THE HEADLINE TEST

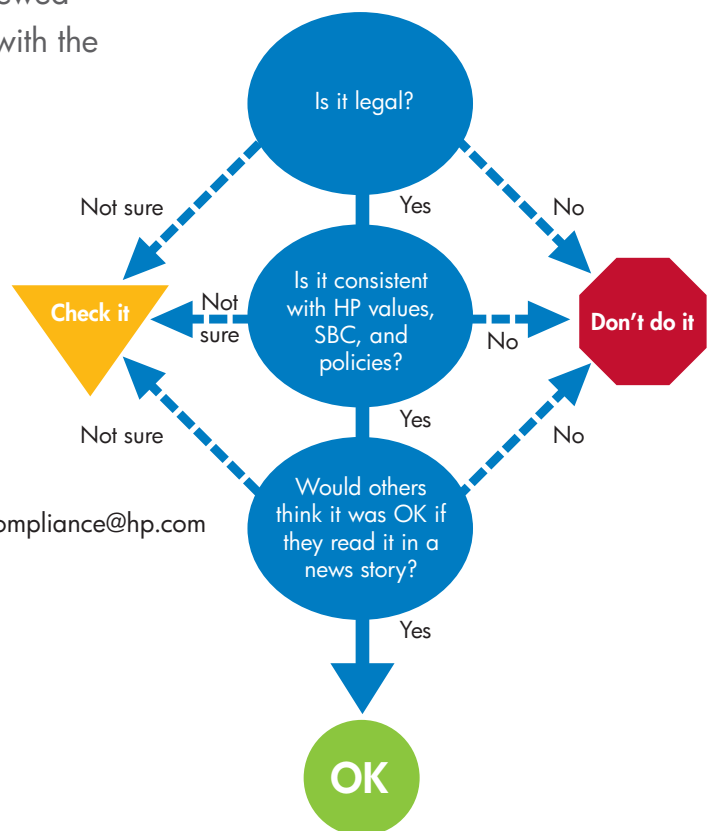
*Unsure about a decision or action?  
Consider the following:*

The Headline Test is a simple but powerful tool designed to make sure we appropriately consider the soundness and impact of our business decisions. It is named after one of the tools most commonly used by executives: “Before I make a decision, I consider how it would look in a news story.”

We should each ask ourselves what the impact would be if the conduct or actions became public or were reviewed by colleagues we respect. If you are uncomfortable with the answer, don’t do it!

**Check it with:**

- Your manager
- Another manager
- The Guideline
- Legal
- Human Resources
- <mailto:corporate.compliance@hp.com>





# BUILDING TRUST

*We gain trust by treating others with integrity, respect, and fairness.*



» **Key** Keys to living up to the “Building trust” section (see Appendix page 15)

» **Q:** I have a concern, but it is not covered in our SBC. Does that mean there is no problem? (see Appendix page 15)

## **WE MAKE ETHICAL DECISIONS**

- Obey the law and HP policies.
- Seek guidance from our SBC and the resources and policies linked to it.
- Talk to colleagues, your manager, or other members of management to get help making the right decision.
- Use your good judgment, the Headline Test, and the supporting decision-making model to work through situations where the right course of action isn’t clear.
- Additionally, managers must provide proper guidance to employees and take appropriate action to prevent, detect, and respond to misconduct.

» [Global HR policies](#)

## **WE TAKE ACTION WHEN AWARE OF MISCONDUCT AND DO NOT RETALIATE**

- Report any alleged misconduct immediately by first using our open door policy. If this does not work or seem appropriate, go to another member of management, Human Resources, or your business unit or regional SBC liaison.
- Contact the Ethics and Compliance Office if you have questions or concerns that you are not comfortable discussing with your management team.
- Speak up for HP values, knowing that our company will not tolerate retaliation against anyone who raises a concern in good faith.

» [Open door policy](#)

## **WE COOPERATE WITH INVESTIGATIONS**

- Cooperate with all internal investigations and audits.
- Work with HP Legal to respond to litigation or requests from government and other external agencies.
- Tell the whole truth when responding to an investigation or audit.
- Never alter or destroy records in response to litigation, an investigation or audit, or when one of these is anticipated.
- Do not discuss an investigation with anyone, unless instructed to do so by the investigators.

» [Records management policy](#)


» [Litigation and investigations policy](#)




# RESPECT

*We treat all people—inside  
and outside the company—with fairness, dignity,  
and respect.*



»  **Keys to living** up to the “Respect” section (see Appendix page 15)

» **Q:** Different countries have different cultures and laws. Does our SBC apply worldwide? (see Appendix page 15)

»  **Red flags:** Harassment (see Appendix page 15)

## **WE HONOR HUMAN RIGHTS**

- Support and respect the protection of human rights and ensure that our business partners and suppliers do the same.
  - Ensure that child labor, prison or forced labor, and physical punishment are never permitted in any operation of HP or our business partners and suppliers.
  - Understand that HP recognizes the right of employees to organize in labor unions in accordance with local laws.
- » [Global citizenship policy](#) » [Partner code of conduct](#)  
» [Supplier code of conduct](#)

## **WE TREAT OTHERS WITH RESPECT**

- Be open and honest with one another.
  - Do not discriminate on the basis of race, color, religion, gender, sexual orientation, gender identity or expression, national origin, disability, age, covered veteran status, or any other characteristic protected by law.
  - Embrace the diversity of all members of the HP team.
- » [Global HR policies](#) » [Non-discrimination policy](#)

## **WE MAINTAIN A SAFE AND SECURE WORK ENVIRONMENT**

- Comply with safety, health, and security policies and procedures.
  - Correct or report any health and safety threats.
  - Do not sell, possess, or use illegal drugs or create a safety risk through drug use or intoxication while on HP property or while conducting HP business.
- » [Environmental health and safety policy](#)  
» [Security policies](#)

## **WE PROMOTE AND PROVIDE A HARASSMENT-FREE ENVIRONMENT**

- Do not behave in a disrespectful, hostile, violent, intimidating, threatening, or harassing manner.
  - Encourage a harassment-free work environment.
  - Refuse to accept or tolerate sexual harassment, including unwelcome sexual advances, requests for sexual favors, or other unwelcome verbal or physical conduct of a sexual nature.
- » [Global HR policies](#)  
» [Harassment-free work environment policy](#)

## **WE RESPECT PRIVACY AND PROTECT PERSONAL INFORMATION**


- Provide transparency in HP practices, provide choice to customers regarding their privacy preferences, and honor those choices.
  - Protect the personal information of current and former employees, members of the Board of Directors, customers, job applicants, online users, business partners, and suppliers.
  - Obtain and use personal information solely for legitimate business purposes and only if you have a legitimate need to know.
- » [Global master privacy policy](#)



# UNCOMPROMISING INTEGRITY

*We are open, honest, and ethical in all of our dealings.*



»  Keys to living up to the “Integrity” section (see Appendix page 16)

» **Q:** I’m doing volunteer work for a local neighborhood group. Every month they need me to make copies or send faxes. If I bring my own paper from home, is it okay for me to use the office equipment? (see Appendix page 16)

»  **Red flags:** We maintain accurate business records (see Appendix page 16)

## WE USE ASSETS WISELY

- Keep personal use of HP assets to a minimum.
- Do not allow other people, including friends and family, to use HP resources.
- Do not use HP equipment or systems to violate the law or to create, store, or send content that others might find offensive.
- Avoid any usage that might lead to loss or damage, including the introduction of viruses or a breach of our IT security.
- Uphold your responsibility to protect HP financial assets.

» [Conflicts of interest policy](#) » [IT policy set](#)

## WE MAINTAIN ACCURATE BUSINESS RECORDS

- Create business records that accurately reflect the truth of the underlying transaction or event.
- Sign only documents, including contracts, that you are authorized to sign and that you believe are accurate and truthful.
- Remember that email and other electronic communications may be business records; avoid exaggeration, derogatory language, and other expressions that could be taken out of context.
- Retain, protect, and dispose of records according to policy.

» [Accounting and finance manual](#)

» [Records management policy](#)

## WE AVOID CONFLICTS OF INTEREST

- Make decisions in the best interest of HP.
- Discuss with your manager any situation that could be perceived as a potential conflict of interest.
- Proactively address situations that may put your interests or those of a family member in potential conflict with HP.

» [Conflicts of interest policy](#)

## WE PROVIDE AND ACCEPT GIFTS AND ENTERTAINMENT ONLY WHEN APPROPRIATE

- Provide and accept gifts, favors, and entertainment only if they are reasonable complements to business relationships.
- Exchange gifts and entertainment that foster goodwill in business relationships, but never provide or accept gifts, favors, or entertainment that may create undue influence, or even the appearance of undue influence.
- Provide gifts, favors, and entertainment only if consistent with the policies of the recipient’s employer as well as HP policies.
- Do not provide gifts, favors, or entertainment to a government official unless doing so is legal and consistent with HP policies.
- Do not solicit gifts, favors, or entertainment.
- Report any gifts, favors, or entertainment you receive to your manager if they have more than nominal value.

» [Conflicts of interest policy](#)

» [Global business amenities policy](#)

» [U.S. business gifts and entertainment policy](#)



# UNCOMPROMISING INTEGRITY *(continued)*

*We are open, honest, and ethical in all of our dealings.*



## Red flags:

- » Misuse of HP assets (see Appendix page 16)
- » Potential conflict of interest situations (see Appendix page 16)
- » We do not bribe (see Appendix page 16)
- » Protecting sensitive information (see Appendix page 16)

## **WE DO NOT BRIBE**

- Do not offer or provide bribes or kickbacks to win business or to influence a business decision—anywhere on anything.
- Use agents and distributors only after they have passed our due diligence process to ensure that our commissions or fee arrangements will not be used as bribes on our behalf.

- » [Global business amenities policy](#)
- » [Dealing with business intermediaries](#)

## **WE PROTECT SENSITIVE INFORMATION**

- Use and disclose HP, customer, business partner, and supplier sensitive information only for valid business purposes.
- Properly label sensitive information to indicate how it should be handled, distributed, and destroyed.
- Share sensitive information outside of HP only with authorized parties who have signed a confidential disclosure agreement.
- Follow HP procedures for reuse, redeployment, and return of all your HP work equipment.

- » [Confidential information policy](#)



## **WE COMPLY WITH LAWS GOVERNING INTERNATIONAL TRADE**

- Remember that every product and service marketed by HP must comply with applicable regulations in all countries where HP authorizes delivery.
- Maintain appropriate import, export, and customs records and controls.
- Seek guidance from HP Global Trade to ensure that international transfers of products, services, or information comply with applicable laws.
- Respond to requests relating to boycotts only as permitted by HP global trade policy or HP Legal.

- » [Global trade policies](#)
- » [HP Standard 014-0: safe and legal products](#)

## **WE DO NOT TRADE ON OR DISCLOSE NON-PUBLIC MATERIAL INFORMATION**


- Do not trade in HP securities or tip others to trade while you are aware of material non-public information about HP.
- Do not trade in the securities of any other company or tip others to trade while you are aware of material non-public information about that company.
- Remember that material non-public information is something that a reasonable investor would consider important in deciding whether to buy, sell, or hold securities and that has not been released to the public.
- Recognize that exercising employee stock options may be considered a “trade.”

- » [Confidential information policy](#)
- » [Insider trading policy](#)

# PASSION FOR CUSTOMERS

*We put our customers first.*



»  Keys to living up to the “Passion for customers” section (see Appendix page 17)

» **Q:** To help me do a better job here at HP, I kept several documents from my previous employer describing various processes they used. Can I use those documents at HP? (see Appendix page 17)

## Red flags:

- » Potential violations of antitrust and fair competition laws (see Appendix page 17)
- » Obtaining business intelligence (see Appendix page 17)

## **WE PROVIDE QUALITY PRODUCTS AND SERVICES**

- Promise only what you can deliver.
  - Deliver on what you promise.
  - Remember products and services delivered by HP stand for quality.
- » [HP quality policy](#)  
» [HP Standard 014-0: safe and legal products](#)

## **WE MARKET RESPONSIBLY**

- Represent our products and services fairly, accurately, and truthfully.
  - Do not create misleading impressions in any advertising, marketing, or sales materials or presentations.
  - Protect the HP brand and marks and only use them with proper authorization.
  - Use due diligence in preventing situations that may lead to the gray marketing of HP products.
  - Do not make false or illegal claims about competitors or their products and services.
  - Use due diligence when choosing a business partner or supplier to ensure that they meet HP standards.
- » [Global brand guidelines](#)  
» [Marketing and sales policies](#)  
» [External communications and endorsement principles](#)  
» [End-user customer verification policy](#)

## **WE COMPETE VIGOROUSLY AND FAIRLY**

- Do not use a substantial market position to establish restrictive practices that diminish competition without valid business justification or consumer benefits.
  - Do not enter into agreements with competitors to set prices; limit production; or divide up customers, suppliers, or markets.
- » [Antitrust/Competition law legal resources](#)

## **WE OBTAIN BUSINESS INTELLIGENCE APPROPRIATELY**


- Respect people’s obligations to protect the confidential information of their current and former employers. Never induce anyone to violate any obligation of confidentiality.
  - Ensure that third parties acting on our behalf live up to our standards.
  - Do not disclose customer, business partner, or supplier non-public pricing information.
  - Accept information in confidence only when HP management agrees that we need it, and only under a written agreement that defines and limits our obligations in dealing with it.
- » [Confidential information policy](#)



# RESPONSIBLE CITIZENSHIP

*We are an economic, intellectual, and social asset in every country and community where we do business.*



»  **Keys to living** up to the “Responsible citizenship” section (see Appendix page 18)

» **Q:** I’ve seen activities at HP that may be creating an environmental hazard, but I don’t want to get involved. Isn’t this the safest course? (see Appendix page 18)

»  **Red flags:** Responsible citizenship (see Appendix page 18)

## **WE ARE STEWARDS OF THE ENVIRONMENT**

- Reduce use of energy, water, and other resources where feasible.
- Design and manufacture our products to increase reuse and recycling.
- Support waste reduction and recycling efforts at HP and in our communities.

» [Global citizenship policy](#)  
» [HP Standard 011: general specification for the environment](#)  
» [Environmental health and safety policy](#)

## **WE ENGAGE WITH RESPONSIBLE BUSINESS PARTNERS AND SUPPLIERS**

- Business partners and suppliers must meet our quality, delivery, service, and pricing standards and be responsible corporate citizens.
  - Communicate our standards for high business partner and supplier performance in ethics, human rights, management, health, safety, and the environment.
  - Shift HP business away from business partners and suppliers who fail to address violations of our standards.
  - Document all business partner and supplier relationships in appropriate written contracts.
- » [Global procurement policy](#) » [Global citizenship policy](#)  
» [Partner code of conduct](#) » [Supplier code of conduct](#)  
» [Contingent worker code of conduct](#)



## **WE COMMUNICATE HONESTLY WITH INVESTORS AND THE MEDIA**

- All communications with investors, analysts, or the media regarding HP business must first be approved by HP Investor Relations, Corporate Communications, or the appropriate HP communications specialists.
- Never give the impression that you are speaking on behalf of HP in any personal communication, including user forums, blogs, chat rooms, or bulletin boards.

» [Confidential information policy](#)  
» [External communications and endorsements principles](#)

## **WE EXERCISE OUR RIGHTS IN THE POLITICAL PROCESS**

- Ensure that your individual political views and activities are not viewed as those of HP.
- Obtain advance approval from HP Government Affairs before lobbying a government official or engaging a lobbyist.
- Remember that HP Government Affairs is solely responsible for managing political contributions on behalf of HP, including donating products, services, transportation, or facilities.

» [Political participation policy](#)

## **WE SUPPORT GIVING AND VOLUNTEERING IN OUR COMMUNITIES**

- Get involved with efforts of your choice to improve your community.
- Do not pressure others to contribute to or join your preferred charities, groups, or political activities.
- Do not participate in HP decisions regarding a charity or other organization where you volunteer.

» [Global contributions policy](#)  
» [Employee volunteerism policy](#)  
» [Conflicts of interest policy](#)



# APPENDIX

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## *Building Trust Together*

### **OUR SHARED VALUES**

#### **Passion for customers**

We put our customers first in everything we do.

#### **Trust and respect for individuals**

We work together to create a culture of inclusion built on trust, respect, and dignity for all.

#### **Achievement and contribution**

We strive for excellence in all we do; each person's contribution is critical to our success.

#### **Results through teamwork**

We effectively collaborate, always looking for more efficient ways to serve our customers.

#### **Speed and agility**

We are resourceful and adaptable, and we achieve results faster than our competitors.

#### **Meaningful innovation**

We are the technology company that invents the useful and the significant.

#### **Uncompromising integrity**

We are open, honest, and direct in all of our dealings.

### **OUR CORPORATE OBJECTIVES**

#### **Customer loyalty**

We earn customer respect and loyalty by consistently providing the highest quality and value.

#### **Profit**

We achieve sufficient profit to finance growth, create value for our shareholders, and achieve our other corporate objectives.

#### **Growth**

We recognize and seize opportunities for growth that build upon our strengths and competencies.

#### **Market leadership**

We lead in the marketplace by developing and delivering useful and innovative products, services, and solutions.

#### **Commitment to employees**

We demonstrate our commitment to employees by promoting and rewarding them based on performance and by creating a work environment that reflects our values.

#### **Leadership capability**

We develop leaders at all levels who achieve business results, exemplify our values, and lead us to grow and win.

#### **Global citizenship**

We fulfill our responsibility to society by being an economic, intellectual, and social asset to each country and community where we do business.

# APPENDIX

## **BUILDING TRUST**

### **Keys to living up to the “Building trust” section**

- Engage in open and honest communication in all your business interactions.
- Keep your promises—show others they can rely on your work.
- Be willing to make the right decision for HP, even if it is not the best decision for your organization or you personally.

### **Question and answer**

**Q:** I have a concern, but it is not covered in our SBC. Does that mean there is no problem?

**A:** No. The SBC cannot possibly address every situation or ethical dilemma. However, the principles, values, and other guidance discussed in our SBC, including the Headline Test, can help you make the right decision. We all are expected to act ethically even in the absence of a company policy. If you need more help, talk to your manager, another member of management, Human Resources, or your Business Group or Region SBC Liaison. You can also send your questions to [corporate.compliance@hp.com](mailto:corporate.compliance@hp.com) or by phone through the Guideline at [AT&T access number] 800-424-2965 (for access outside the U.S. and Canada, see: AT&T access number). In the U.S. and Canada, dial 800-424-2965, or from outside the U.S. and Canada:

- 1) Go to <http://www.business.att.com/bt/access.jsp>
- 2) Find your country in the alphabetical listing
- 3) Dial the **AT&T Direct® Code**
- 4) When prompted, dial 800-424-2965

Or you may send a letter via postal mail to:  
HP Ethics and Compliance Office  
5400 Legacy Drive  
Plano, TX 75024 USA

## **RESPECT**

### **Keys to living up to the “Respect” section**

- Treat others the way you and they would like to be treated.
- Let others know if they make you uncomfortable.
- Report concerns to your manager, another member of management, Human Resources, or the Ethics and Compliance Office.
- Behave professionally and do not threaten or intimidate anyone.

### **Question and answer**

**Q:** Different countries have different cultures and laws. Does our SBC apply worldwide?

**A:** Yes. Our SBC establishes principles for business conduct applicable throughout HP, regardless of the location or the particular HP organization or business. Where differences exist on any particular question as a result of local customs, cultures, or laws, employees must apply either the SBC or local requirements—whichever sets the highest standard of behavior with respect to that question.

### **Red flags: Harassment**

- Dismissive attitude or comments about anti-harassment policies
- Depiction of harassers as victims or of victims as complainers
- Unwelcome remarks, gestures, or physical contact
- The display of sexually explicit or offensive pictures or other materials
- Sexual or offensive jokes or comments (explicit or by innuendo)
- Verbal abuse
- Threats or taunting

# APPENDIX

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## **UNCOMPROMISING INTEGRITY**

### **Keys to living up to the “Uncompromising integrity” section**

- Do the right thing, regardless of the pressure.
- Protect all HP assets, remembering that our reputation is the easiest asset to lose and the most important to keep.

### **Question and answer**

**Q:** I’m doing volunteer work for a local neighborhood group. Every month they need me to make copies or send faxes. If I bring my own paper from home, is it okay for me to use the office equipment?

**A:** No. HP employees cannot use HP resources for employee-initiated volunteer activities. While you would bring your own paper, you are still using HP resources such as toner, ink, network bandwidth, etc.

### **Red flags: We maintain accurate business records**

- Establishing any off-the-books funds or undisclosed or unrecorded assets or liabilities
- Backdating contracts or other documents
- Creating side agreements outside HP contracting processes

### **Red flags: Misuse of HP assets**

- Coworkers who are excessively protective of their computers (because they may be concerned that their misuse of their computers or other HP assets may be discovered by others)
- HP property that is not secured when not in use
- Allowing others to borrow or use HP equipment without approval
- Unknown individuals without proper credentials on our premises
- Excessive use of HP resources for personal purposes
- Lax enforcement of electronic access control cards and other tools that provide access to HP facilities
- Sharing passwords

### **Red flags: Potential conflict of interest situations**

- Outside employment with or receiving compensation from a customer, business partner, supplier, or competitor
- Significant financial interest in a customer, business partner, supplier, or competitor held by you or a family member
- Conducting business with a customer, business partner, or supplier, channel partner, or customer when someone in your family or anyone else with whom you have a close personal relationship has a substantial role in that company
- Serving in a government or public body that has regulatory authority over HP or that purchases from HP

### **Red flags: We do not bribe**

- Request by an agent for payments in a different country, to a third party, or in cash
- Directions from a government official that a particular agent is to facilitate a transaction
- Agent who has a reputation for making prohibited payments
- A close relationship between an agent and a government official
- Request by an agent for a charitable or political contribution

### **Red flags: Protecting sensitive information**

- Information that is not clearly marked as sensitive or non-sensitive
- Sending sensitive information to unattended fax machines or printers
- Discussing confidential information loudly or openly when others might be able to hear
- Distribution of copyrighted materials without the appropriate copyright notice
- Discussions about HP proprietary information with customers or suppliers without proper approval and knowledge of the status of the relationship as confidential or non-confidential
- Confidential drafts and notes that are improperly discarded or not shredded when no longer needed



# APPENDIX

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## **PASSION FOR CUSTOMERS**

### **Keys to living up to the “Passion for customers” section**

- Focus on treating the customer right.
- Choose business partners, suppliers, and others who represent HP with care.

### **Question and answer**

**Q:** To help me do a better job here at HP, I kept several documents from my previous employer describing various processes they used. Can I use those documents at HP?

**A:** It depends. If the documents contain your former employer’s confidential or proprietary information, you cannot use or share this information. HP expects all employees to honor any disclosure or use restrictions on the confidential information they have obtained from former employers or other third parties. In fact, new employees are instructed not to bring such information onto HP premises. If you are unsure, you should not use or share this information until you have consulted with the HP Legal Department.

### **Red flags: Potential violations of antitrust and fair competition laws**

- Formal or informal understandings with competitors that stabilize prices or allocate sales territories, product lines, or groups of customers
- Exchanging information with competitors on these subjects
- Agreements with customers, business partners, or suppliers that establish the resale price of a product or service, limit a customer’s right to sell a product, or condition the sale of a product or service on an agreement to buy other products or services
- Pricing below cost, especially when we have a substantial share of the market
- Discriminating unfairly between similarly situated customers or channel partners

### **Red flags: Obtaining business intelligence**

- Using anyone else’s confidential information without appropriate approvals
- Pressuring or encouraging an HP employee to discuss confidential information from their previous employer
- Suggestions from third parties for new products, product features, or services when the source of the original idea is not fully known
- Obtaining information through any behavior that could be construed as “misrepresentation” or “spying” or that you would not be willing to fully disclose
- Relying, without verification, on third parties’ claims that business intelligence was properly obtained

# APPENDIX

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## **RESPONSIBLE CITIZENSHIP**

### **Keys to living up to the “Responsible citizenship” section**

- Take community interests into account when making decisions.
- Make decisions with a long-term view.
- Remember that people outside HP judge us solely on our actions because they are not inside our decision-making processes.

### **Question and answer**

**Q:** I’ve seen activities at HP that may be creating an environmental hazard, but I don’t want to get involved. Isn’t this the safest course?

**A:** No. All HP employees are responsible for taking action when aware of potential violations of our SBC. This responsibility includes reporting environmental hazards or other unsafe working conditions of which you are aware. Retaliation against anyone making a good faith report will not be tolerated.

When concerns or questions come up, communicating at the local level, either peer-to-peer or with your manager, is often the best place to start. When it is not possible to raise or resolve an issue with your immediate manager, use the open door policy to contact the next level of management, Human Resources, or the Ethics and Compliance Office at: [corporate.compliance@hp.com](mailto:corporate.compliance@hp.com) or by phone through the GuideLine (24 hours a day, translation available, callers can remain anonymous)—from the U.S. and Canada, dial 800-424-2965, or from outside the U.S. and Canada:

- 1) Go to <http://www.business.att.com/bt/access.jsp>
- 2) Find your country in the alphabetical listing
- 3) Dial the **AT&T Direct® Code**
- 4) When prompted, dial 800-424-2965

Or you may send a letter via postal mail to:  
HP Ethics and Compliance Office  
5400 Legacy Drive  
Plano, TX 75024 USA

### **Red flags: Responsible citizenship**

- Using materials that endanger the environment
- Carelessly making a supplier’s confidential information accessible to others to see
- Creating side agreements outside HP contracting processes
- Giving a reporter an interview on HP business without involving Corporate Communications
- Supporting a political candidate through unapproved use of HP resources

# BUILDING TRUST TOGETHER, ONE DAY AT A TIME

**We are all occasionally faced with situations where the right decision is not necessarily clear. Our SBC, embedded tools, and links are available to help you make the right choice.**

## ***IT IS UP TO YOU TO CHOOSE THE RIGHT ACTION TO MAKE BUILDING TRUST A REALITY. HP DEPENDS UPON EACH OF US TO:***

- Understand how the SBC is structured
- Internalize the underlying principles that guide everyday behaviors
- Use the Headline Test to find answers when challenged with ethical issues
- Become familiar with the keys to success so that you can model ethical behavior
- Learn to recognize red flag behaviors or actions
- Learn to use the links in the SBC to find details regarding policies and other information
- Know where to go and who to contact if you have questions

## ***FOR HP TO MAINTAIN ITS REPUTATION AS A COMPANY WITH AN ETHICAL LEADERSHIP CULTURE, WE MUST ALL WORK TOGETHER TO BUILD TRUST AROUND OUR SHARED VALUES.***

We need to inspire the trust of customers, business partners, suppliers, and our colleagues. At all levels, we should fulfill our commitments to others as outlined by our SBC.

## ***CONTACTING THE ETHICS AND COMPLIANCE OFFICE***

If you have a question or wish to discuss a possible violation of the SBC, you should first discuss it with those in your management chain. If you are not comfortable with that approach for any reason, or if no action is taken, you may contact your business, regional, or global function SBC liaison or the Ethics and Compliance Office:

- **By email:** [corporate.compliance@hp.com](mailto:corporate.compliance@hp.com)
- **By phone:** From anywhere in the world, call the GuideLine—24 hours a day, translation available, callers can remain anonymous, except where anonymous reporting is prohibited by local law

From the U.S. and Canada: 800-424-2965

Outside the U.S. and Canada:

- 1) Go to <http://www.business.att.com/bt/access.jsp>
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To learn more, visit [www.hp.com/hpinfo/](http://www.hp.com/hpinfo/)

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