



Ethics and human rights

Technology is transforming the world, making it more important than ever for companies such as HP to make this transformation thoughtfully and responsibly. [Our values](#) guide us to behave ethically and with respect for others, including suppliers, partners, employees, customers, and society more broadly. We use our scale and influence to encourage similar behavior beyond our operations. Read more in [Human rights on page 85](#).

We work diligently to maintain a strong culture of integrity globally, regardless of cultural norms or local laws and regulations. Our [Standards of Business Conduct \(SBC\)](#) applies to all HP employees, everywhere. Our robust ethics and compliance program ensures we don't just avoid doing the wrong thing, but also that we enhance our brand by winning the right way. Our approach requires that all HP employees, partners, and suppliers, everywhere, behave with integrity and use lawful and ethical business practices. We do not tolerate bribery and will never trade our integrity for a business opportunity. This means refusing to pay bribes or kickbacks even when it means walking away from a deal (see [Anti-corruption](#) section).

We have processes in place for employees, partners, and suppliers to report ethics issues that do arise, and we work quickly to resolve those according to our policy and local laws. Read more in [Asking questions and reporting concerns on page 84](#).

HP codes of conduct

Employees

[Standards of Business Conduct](#)
(20+ languages)

HP U.S. Public Sector Employees

[U.S. Public Sector Code of Conduct](#)

Contingent Workers

[Contingent Worker Code of Conduct](#)
(20+ languages)

Suppliers

[HP Electronic Industry Citizenship Coalition \(EICC\) Code of Conduct](#)

Partners

[Partner Code of Conduct](#)
(20+ languages)

Ethics and compliance

Every day, HP's actions impact our reputation. Legal compliance is the absolute minimum we expect of our employees, partners, and suppliers. We diligently promote a culture of integrity and ethical decision making everywhere we operate, even when it means holding ourselves to a higher standard than local laws or customs require. We have in place the standards, governance structures, training, communications, and reporting and investigation procedures needed to ensure ethical behavior and legal compliance globally.

Our [Standards of Business Conduct \(SBC\)](#) sets non-negotiable expectations for all our decisions and actions and provides guidance in difficult situations, such as avoiding conflicts of interest and rejecting bribery and corruption. The SBC is available in more than 20 languages and is supplemented by additional codes for HP employees working with the U.S. Public Sector, [contingent workers](#), [suppliers](#), and [partners](#).

Governance structure and responsibilities

Our governance structure includes executives from the board level and down. They set the tone at the top and reinforce our ethics and compliance culture. Our Ethics and Compliance Office leads this work from within HP's Office of the General Counsel, with oversight from the [Board of Directors](#).

Meg Whitman became HP's president and chief executive officer in September 2011, and has served as a member of HP's board since January 2011. When Ms. Whitman was appointed, Raymond Lane moved from nonexecutive chairman to executive chairman of the board of directors. In connection with Mr. Lane's transition to an executive role, HP appointed Rajiv Gupta to serve as lead independent director.

The board's [Audit Committee](#) provides nonexecutive input into HP's ethics and compliance program and provides guidance to our chief ethics and compliance officer as required.

See also information on [HP board membership](#), [board committees and composition](#), and [corporate governance guidelines](#), which covers items including director independence and compensation.

Ethics and compliance governance structure



Key ethics and compliance functions

The diagram shows HP's organizational governance structure for ethics and compliance. Here are just two examples of significant activities carried out by these functions during the year:

- The Compliance Office continued to assess our compliance functions against predefined standards, identify new legal risks, and track progress against recommendations made during our “wellness assessment” process, which began in 2009. Every 2 years, we comprehensively assess compliance risks for each business group and will next do so in 2012. The Compliance Office is the central hub for 44 companywide compliance functions including the privacy, anti-corruption, and global trade offices.
- We increased the number of SBC liaisons from 28 to 36 to further embed ethics and compliance into each business unit. SBC liaisons are senior-level employees who champion ethics and compliance across HP.

HP employees making an impact: Eberhard Koehler

Eberhard Koehler is working to level the playing field among HP's channel partners, helping to ensure that business is done fair and square. Learn more about Eberhard Koehler on page 140.

Communication and training

Every person at HP is accountable for their actions—regardless of the position held in the company. We continue to strengthen our training and awareness program to maintain focus on ethics and compliance. The main initiatives include:

- **Mandatory ethics and compliance annual refresher course** This 60-minute online session covers the SBC and key policies, procedures, and high-risk issues. Between March 1 and June 30, 2011, 99.2% of employees (excluding new hires, those on leave of absence, and people leaving HP) completed the course. New hires are asked to complete a more comprehensive course within 30 days of their start date.
- **Videos** Our Ethical Moments videos depict ethical issues that might arise and how to handle them. In 2011, approximately 35,000 employees viewed each of four videos on reporting fraud, accuracy of records, data protection, and gifts and entertainment. In our Leaders on Ethics videos, senior leaders provide guidance on company policies and workplace behavior. This year, the videos covered anti-corruption, social media, and information technology security.
- **IonETHICS** New this year, *IonETHICS* combines our previous employee *Ethics Bulletin* and *SBC Lessons Learned* for leaders into a twice yearly presentation of anonymous real-life case studies, “what if?” scenarios, timely tips, and statistics to help employees understand the questions to ask and actions to take if faced with similar situations.

Spotlight on anti-corruption

HP's expansion in growth markets means we increasingly operate in countries where regulations and cultural norms may be less stringent than our own standards. Our responsibility is to make sure everyone lives up to the highest standards.

Corrupt behavior impedes legal compliance, and social and economic development, and undermines the very foundation upon which HP was built. We do not tolerate any bribery and will never trade our integrity for a business opportunity, and we do not offer bribes or kickbacks to win business or influence a business decision.

HP is committed to complying fully with all anti-corruption and anti-money laundering laws and regulations, including the U.S. Foreign Corrupt Practices Act and the UK Bribery Act. To ensure compliance with all applicable anti-corruption laws, wherever we do business, we have an extensive program, which is summarized in HP's [Anti-Corruption Compliance Program Overview](#). HP also has policies for [Global Business Gifts, Travel, and Entertainment](#) and [Political Contributions](#).

To minimize potential issues, we use globally respected data—the [Corruption Perceptions Index](#), produced by Transparency International—in conjunction with internal and other external data, to identify high-risk countries and raise awareness of ethical issues in each market.

Anti-corruption training is part of our mandatory ethics and compliance induction for new hires and an annual refresher course for all employees. Additionally, HP salespeople globally complete detailed, scenario-based anti-corruption training.

Those who work with public sector customers in the United States complete additional training specific to the unique requirements of doing business with the U.S. government. The ethics and compliance office provides specific guidance for growth markets, including face-to-face training on the SBC and Global Business Gifts, Travel, and Entertainment Policy in local languages.

In 2011, we launched a blueprint to standardize the way we implement our program in each new market, based on our experience in existing markets. We also appointed ethics and compliance directors in our Asia Pacific and Europe, Middle East, and Africa regions to strengthen our approach.

In addition, we require all employees, partners, and suppliers to report corrupt activity and to understand and follow our anti-corruption policies—ignorance is not an excuse for failing to comply. We encourage them to contact the Ethics and Compliance Office to check whether an action might constitute misconduct, and we promptly investigate alleged violations of our policies or the law.

The German Public Prosecutor's Office, the U.S. Department of Justice, and the Securities and Exchange Commission are investigating allegations of misconduct in connection with a 2003 transaction between a former HP subsidiary in Germany and the Russian General Prosecutor's Office (GPO). HP continues to cooperate fully with these authorities in their ongoing investigations of the GPO transaction. We take these matters very seriously, and HP remains committed to upholding the highest standards of ethics and compliance in the conduct of its business.

Additional activities in 2011 included:

- Delivering ethics and compliance training to country managers and senior leaders in high-risk countries. In 2011, we provided the training to 15 such countries. Other countries may participate at their discretion. The training is designed by the Ethics Office and delivered by regional and country attorneys in their native countries. It highlights current trends, and we encourage countries to customize the content where appropriate.
- Refreshing our ethics and compliance training for new employees to reflect current trends. The comprehensive, straightforward course explains the reporting channels available for discussing ethical concerns or reporting violations and HP's commitment to nonretaliation for employees reporting suspected violations in good faith.
- Training our global sales force in anti-corruption, with a particular focus on public sector sales. In 2012, we will deliver anti-corruption training to employees from Privacy, Social and Environmental Sustainability and Compliance, Global Security, and Government Relations, in addition to our salespeople.

We work to provide more counseling on ethical issues to prevent violations of law, company policy, or the SBC. In 2011, we increased ethics and compliance consulting matters by 34.8%, compared with 2010. Views of the questions and concerns page of HP's global website increased by almost 90% between 2010 and 2011 as a result of our focus on encouraging people to seek guidance when they are unsure of the best course of action.

When alleged violations do occur, we provide formal, confidential communication reporting channels for employees and third parties including, beginning in 2011, an online form, as well as a global 24-hour toll-free hotline with translators available. Where allowed by law, reporting can be anonymous.

See how to [ask a question or report a concern](#).

Asking questions and reporting concerns

HP encourages employees to speak up, ask questions whenever they are uncertain of the best course of action, and report anything that doesn't seem right—without fear of retaliation.

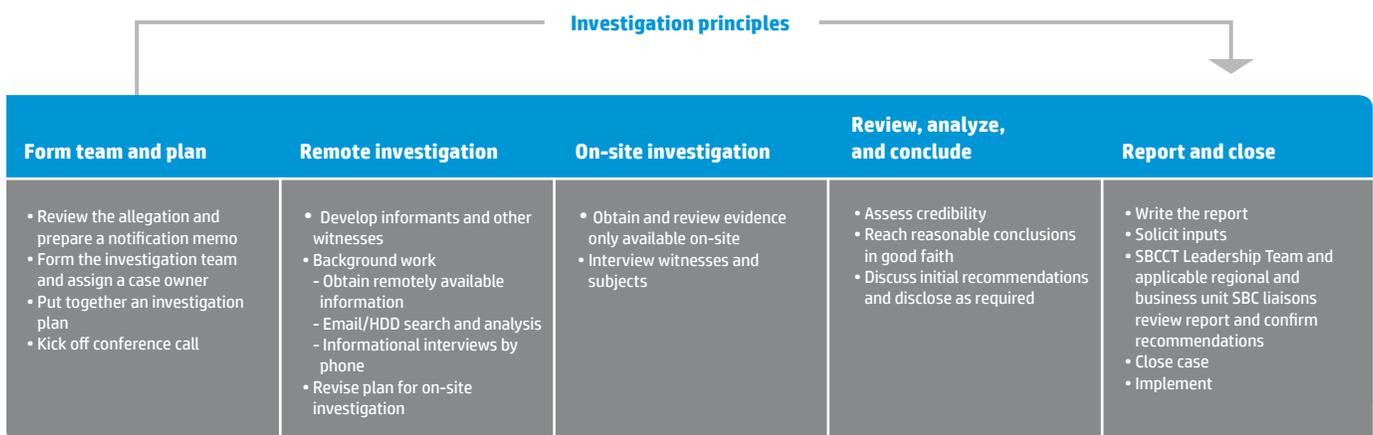
In keeping with HP's longstanding "open door" approach to communication, we provide guidance on asking questions and reporting concerns in our SBC, accompanying training module, corporate policy directory, and ethics and compliance website. Employees can talk to their line manager or more senior managers if ethics issues arise, or seek advice from our ethics and compliance experts or regional or business SBC liaisons.

Investigating concerns

HP's Global Case Management System records allegations of ethical violations in a worldwide database, and provides management with access to incident details as needed, while protecting personal information. Data recorded in the system enables us to identify locations where higher levels of ethics and compliance-related incidents are being reported, indicating where additional action may be needed.

We respond promptly to all alleged violations and conduct investigations as appropriate. Investigations may involve local, regional, or corporate-level employees, depending on the allegation, and may include members of other relevant functions, as needed. The Litigation Investigations team oversees all escalated, corporate-led investigations. Details and results of investigations are kept confidential to the extent reasonably practical. We take appropriate disciplinary action based on the results of our investigations, including terminating employees and reviewing relationships with partners where necessary.

Investigation process overview



Items reported to the Global SBC team or other compliance functions, 2007–2011

| | 2007* | 2008 | 2009 | 2010 | 2011 |
|--------------------------------|-------|------|------|------|------|
| Human resources | 37% | 56% | 35% | 44% | 42% |
| Misuse of assets | 20% | 19% | 14% | 11% | 10% |
| Fraud | 12% | 5% | 12% | 10% | 9% |
| Sales channel violations | 9% | 1% | 3% | 3% | 3% |
| Conflicts of interest | 7% | 4% | 7% | 6% | 8% |
| Confidentiality | 4% | 4% | 6% | 5% | 6% |
| Customer relationships | 1% | 0% | 2% | 2% | 3% |
| Financial and public reporting | 1% | 1% | 4% | 3% | 2% |
| Competition | 0% | 1% | 1% | 1% | 3% |
| Other | 9% | 9% | 16% | 15% | 14% |

* This data is for the calendar year. Data for 2008–2011 is for HP's financial year ending October 31, 2011.

Human rights

Human rights are the fundamental rights, freedoms, and standards of treatment to which all people are entitled. HP upholds and respects human rights as reflected in the United Nations (UN) Universal Declaration of Human Rights (UDHR), the UN Global Compact, and the UN Guiding Principles on Business and Human Rights.

Respecting human rights is a core value at HP and is embedded in everything we do. We believe it is our corporate responsibility to use our size and influence to promote human rights in our communities. We apply this commitment across our business, from our

suppliers to our own operations to protecting the privacy of our customers. Our formal commitments are outlined in HP's [Global Human Rights Policy](#).

During 2011 we reviewed and enhanced our Global Human Rights Policy and strengthened HP's internal governance for managing human rights issues and fulfilling our human rights commitments.

We continue to participate in leadership initiatives and engage with organizations that promote global respect for human rights such as the Global Business Initiative on Human Rights (GBI) and BSR.

HP employees making an impact: Zoe McMahon

As part of her work as director of HP's Social and Environmental Sustainability and Compliance program, Zoe McMahon collaborates with human rights organizations and draws on HP's experience to help improve working conditions in supply chains worldwide. Learn more about Zoe McMahon on page 142.

Faris Natour Director, Human Rights, BSR

Faris looks to HP to be at the forefront of businesses developing innovative approaches to addressing human rights. Visit our online gallery of external stakeholder perspectives to see Faris's video.



Features of HP's enhanced Global Human Rights Policy

Following a risk assessment of HP's human rights policies and practices conducted by the Danish Institute on Human Rights (DIHR) in 2010 and commissioned by HP, our Global Citizenship Council (GCC) determined that the company's longstanding human rights policy should be revised to provide greater focus on the areas identified as priorities for our industry.

The policy, expanded in 2011, establishes HP's commitment to leadership in integrating respect for human rights worldwide into our operations and across our business. HP will in practice:

- Comply with laws and regulations where HP does business and adopt and apply international standards where laws are less stringent.
- Complete due diligence to avoid complicity in human rights violations.
- Regularly assess human rights risks, policies, and impacts and provide visibility of the results to senior executives.
- Provide access to independent grievance mechanisms immediately to raise concerns or identify adverse human rights impacts.
- Promptly investigate allegations and pursue action to mitigate any adverse human rights impacts.
- Promote continual improvement through capability building for our business partners, terminating relationships only as a last resort.
- Advance our human rights practices through a journey of cumulative progress.
- Report transparently on our efforts.

The policy highlights the cross linkage between human rights and other existing HP policy areas such as supply chain management, employment practices, and privacy. It summarizes human rights components of existing policies that affirm HP's commitment to human rights across business functions.

Human rights governance and management

Because respect for human rights takes many forms and can occur in multiple areas of HP's business, we need strong governance to ensure consistent risk identification and issues management. During 2011, we added a human rights program manager and transferred responsibility for human rights program management to the Ethics and Compliance Office within the Office of the General Counsel.

HP's GCC, sponsored by a member of the HP Executive Council, is made up of senior executives and subject matter experts from across the company. The council meets quarterly to promote global citizenship and human rights. During 2011, the membership of the GCC was modified to ensure appropriate senior leader and subject matter expert representation. The GCC was instrumental in the human rights policy review and approval of the enhanced policy.

Related to this process, we discussed seven focal areas identified by the DIHR with external stakeholders:

- Labor and employment, especially in our supply chain
- Conflict minerals
- Privacy and data protection
- Diversity and discrimination
- Freedom of expression
- Water
- Customer use of products and services

Feedback indicated that water issues were likely to increase in significance and that we should add an eighth focus area, anti-corruption, to our watch list.

External leadership

HP continued its external advocacy and leadership to promote human rights during 2011, primarily through participation in the GBI. Supported by 14 companies, the GBI is pursuing two complementary workstreams: "action learning around the UN Guiding Principles on Human Rights" and "business awareness and capacity building."

During 2011, HP representatives spoke at the GBI Roundtable in Malaysia, contributing insights on incorporating respect for human rights through corporate policies and processes. HP is also involved in a project to provide guidance on how human rights principles can most effectively be embedded in contractual relationships.

Other sections of the HP Global Citizenship Report relevant to human rights

Human rights issues intersect many aspects of HP's global citizenship work. Below are links to other sections of this report containing aspects of human rights management:

- [Anti-corruption](#)
- [Reporting and investigating human rights and other ethics concerns](#)
- Conflict minerals tracing and elimination (see below)
- Health, education, and community initiatives in support of human rights
- Labor, employment, diversity, and antidiscrimination in HP's operations
- Privacy and data protection
- Supply chain human rights issues
- Water availability

Human rights–related policies

HP policies with particular relevance to human rights include:

- [HP Standards of Business Conduct](#)
- [HP Global Human Rights Policy](#)
- [Contingent Worker Code of Conduct](#)
- HP Best Work Environment Policy
- [HP Environmental, Health, and Safety \(EHS\) Policy](#)
- [HP Global Citizenship Policy](#)
- [HP Global Master Privacy Policy](#)
- [HP Harassment-free Work Environment Policy](#)
- [HP Nondiscrimination Policy](#)
- [HP Open Door Policy](#)
- [HP Electronic Industry Citizenship Coalition \(EICC\) Code of Conduct \(supplier code of conduct\)](#)
- [HP Supply Chain Social and Environmental Responsibility Policy](#)
- [Partner Code of Conduct](#)

Conflict minerals

HP plays a leading role in international efforts focused on achieving practical solutions to the issue of conflict minerals in the Democratic Republic of Congo (DRC).

Minerals originating from the DRC have been a concern for more than a decade because some mines are controlled by armed militia engaged in a civil war. Transport over long distances from the mine is also vulnerable to interference by these forces. The problems in the DRC are complex and intractable, but HP has determined that its leadership and resources, working in collaboration with others, can develop pilot supply chains through which minerals can be mined free from the influence of armed groups.

One of our prime concerns is to avoid a widespread exit of trade from the region. This would worsen the plight of the population, and may not reduce trade in conflict minerals by those industries and companies not obligated to make disclosures under U.S. law. We believe that advancing multi-stakeholder initiatives will encourage others to join us in building a lasting solution. We have engaged widely, working in partnership with others committed to achieving conflict-free trade with the DRC, including industry peers and trade organizations, nongovernmental organizations (NGOs), and governments.



Mining tantalite at Luba Mine in Katanga, DRC.

Progress toward a solution

In 2011 HP and its partners made significant progress on the following five fronts: (1) conducting due diligence of HP's supply chain, (2) supporting the development of an industry due diligence approach, (3) advancing the Electronic Industry Citizenship Coalition Global e-Sustainability Initiative (GeSI) Conflict-Free Smelter (CFS) program, (4) supporting an alliance for in-region mineral certification, and (5) influencing policy and legislation.

Conducting due diligence of our supply chain

HP worked to conduct due diligence on its suppliers in advance of the final U. S. Securities and Exchange Commission (SEC) regulations implementing the conflict minerals provisions of the Dodd-Frank Act. We then followed up in August 2011 with a formal communication requiring suppliers to provide information about the smelters they use, and requesting that they adopt a DRC conflict-free policy and set the same requirements for their suppliers. HP's suppliers have provided the names of several hundred possible smelters and refiners. We are working with those companies to confirm which are smelters and will encourage those not already involved in CFS to participate in the program.

Supporting the development of an industry due diligence approach

HP has developed and propagated to the industry a common approach to conducting due diligence. We were a codeveloper of the [EICC-GeSI reporting template](#) used to share due diligence information between suppliers and customers. We also cofacilitated the implementation of the dashboard tool that supports this reporting template, facilitating and standardizing data collection and reporting.

In addition, HP helped to teach hundreds of industry members how to use the template and dashboard to advance this standardized approach, leading to improved accuracy of information and less administrative duplication.

Advancing the CFS program

HP is one of five company representatives on the Audit Review Committee of the CFS program. The committee's role is to identify and validate smelters that process only conflict-free minerals. CFS auditors have visited and reviewed more than 40 smelters to conduct audits according to CFS-developed protocols for tantalum, tin, tungsten, and gold—audit protocols shared with all industry sectors. To date, 11 tantalum smelters have been validated as conflict free through this process. The participation of 22 gold, 5 tungsten, and 45 tin smelters is under way.¹

The list of conflict-free smelters is maintained at www.conflictreesmelter.org.



Miners using a sluicing technique to concentrate tantalite ore at the Mai Baridi Mine in Katanga.

Supporting an alliance for in-region mineral certification

Establishing a validated supply of minerals to smelters poses significant challenges. Given that there is no visible difference between minerals from different mines, there is a need for secure traceability from mine to smelter to avoid misrepresentation of conflict minerals as conflict free. In addition, militias often engage in extortion of workers during mineral transport rather than at the mine itself, further confusing the clear origin of minerals. To be certified as conflict free, all transactions reflecting movement of minerals from mines to smelters need to be transparent. The Public-Private Alliance for Responsible Minerals Trade was founded to help establish a system of traceability in supply chains where there is a risk of involvement with conflict. The Solutions for Hope project is a leading example of how conflict-free tantalum is being sourced in the DRC today (see details on next page).

¹ As of March 15, 2012.

Public-Private Alliance for Responsible Minerals Trade (PPA)

The rationale underpinning the newly established [Public-Private Alliance for Responsible Minerals Trade](#) is that collaboration between influential stakeholders is the key to achieving change with respect to sourcing conflict-free minerals. PPA is a joint initiative between the U.S. government, private sector companies, trade associations representing a range of industries, NGOs, and the International Conference on the Great Lakes Region (ICGLR). This alliance will act as a hub to support developing secure supply chains for conflict-free minerals. Notably, HP was the first corporation to commit to joining the PPA, and an HP representative was elected to its Governance Committee.

The PPA will focus on three functions:

- Growing existing programs and systems for businesses to source minerals from mines that have been audited and certified as conflict free
- Providing a platform for coordination and dialogue among government, industry, and civil society participants seeking to support conflict-free mineral sourcing in the DRC and Great Lakes Region
- Supporting a website that provides companies and other stakeholders with information about sourcing minerals in the DRC while remaining compliant with U.S. law

HP was one of two companies with representatives who traveled to the DRC to meet with stakeholders, visit mines, and assess the situation on the ground to inform HP's PPA governance role. During this trip, HP representatives participated in a series of separate meetings with other PPA members and the Provincial Minister of Mines of Katanga, Maniema, North Kivu, and South Kivu, as well as the local



HP's program manager Jay Celorie inspecting the tantalite crushing and homogenization processing at Kalemie Warehouse in Katanga, DRC.

civil society in Katanga, North Kivu, and South Kivu. In addition, HP representatives visited tantalite and cassiterite mines in Katanga, wolfram and cassiterite mines in Rwanda, and gold and cassiterite mines in South Kivu. Finally, HP and other PPA representatives met with the United Nations Organization Stabilization Mission in the DR Congo (MONUSCO) Head of Operations in Bukavu to understand the current situation with armed militias in the Kivu provinces.

Solutions for Hope project

In 2011, HP announced its participation in Solutions for Hope, a project led by major capacitor manufacturer, AVX Corporation. One of the prime uses of tantalum is in the manufacture of electrical capacitors. Solutions for Hope has achieved the first validated source of conflict-free tantalum ore from the DRC through a "closed pipe" supply chain stretching from a mine free from conflict interference to a validated smelter.

The first delivery of conflict-free tantalum took place in November 2011. After processing by a validated conflict-free smelter, it will be used to manufacture the first DRC conflict-free tantalum capacitors. HP commends AVX for its leadership on this issue and intends to incorporate AVX's conflict-free tantalum capacitors in HP products when the capacitors become available. We believe it is appropriate to use our purchasing power as a market incentive for expansion of similar initiatives.

HP visited the mines, and the processing, warehousing, and smelting locations of the "closed pipe" Solutions for Hope project and observed how each of the below-listed parties has an important role to play in a responsible mineral supply chain:

- Mining co-op that coordinates the miners and provides equipment and training
- Mining company that owns title to the mining concession, purchases the minerals from the miners, supports the traceability of the transactions, and enables the concentrating and export of the minerals in a legal and transparent nature
- International Tin Supply Chain Initiative (iTSCi) employees who provide the independent tracking of the minerals produced
- Agents who work on behalf of the DRC government issuing iTSCi tags and verifying the iTSCi-reported totals
- Division of Mines that supports exporting minerals out of the DRC
- AVX, the corporation that has committed to purchase the tantalite at agreed prices

The on-the-ground review of this project revealed how a successful and responsible mineral supply chain can be created in the DRC.

Influencing policy and legislation

HP supported the inclusion of the conflict minerals clauses in the [Dodd-Frank Act](#), which require disclosure of the use of tungsten, tantalum, tin, and gold originating in the DRC. We believe these provisions will facilitate greater transparency in supply chains and reduce the trade in minerals that fund armed conflict in the DRC. However well-intentioned the regulation, implementation has challenging

implications. For example, to comply, many companies are likely to eliminate trade from the DRC sources altogether, damaging that country's economy and worsening conditions for its people.

HP is seeking to reduce the adverse economic impact of the Dodd-Frank Act on the people of the DRC. We are advocating for implementation mechanisms that should encourage continued trade with the DRC.

During 2011, HP played a leading role in developing consensus comments and recommendations from a multi-stakeholder group of NGOs and socially responsible investors on this issue. These comments and recommendations were submitted to, and discussed with, the SEC.

HP also supports the [Organisation for Economic Co-operation and Development's](#) (OECD) due-diligence guidance on conflict minerals. HP is participating in a 1-year pilot program to test implementation

of the OECD's guidance and will provide feedback to the OECD through a series of three questionnaires and in-person multi-stakeholder meetings.

Next steps

During 2012 we will continue progressing toward conflict-free minerals by tracing the smelters in our supply chain and publishing relevant details. We will encourage those smelters to participate in the CFS by giving preference to sourcing from smelters validated as conflict free.

We will continue our support for the CFS program and also for efforts to establish validated in-region conflict-free sourcing through the PPA and Solutions for Hope project.