

DEFENCE COMPANIES INDEX (DCI) ON ANTI-CORRUPTION AND CORPORATE TRANSPARENCY 2020

FINAL ASSESSMENT

HEWLETT PACKARD ENTERPRISE

The following pages contain the detailed scoring for this company based on publicly available information.

The table below shows a summary of the company's scores per section:

Section	Number of Questions*	Score Based on Publicly Available Information
1. Leadership and Organisational Culture	4	7/8
2. Internal Controls	6	7/12
3. Support to Employees	7	9/14
4. Conflict of Interest	4	4/8
5. Customer Engagement	7	8/14
6. Supply Chain Management	5	7/10
7. Agents, Intermediaries and Joint Ventures	10	9/20
8. Offsets	4	0/8
9. High Risk Markets	4	5/8
10. State-Owned Enterprises	0	N/A
TOTAL		56/102
BAND		C

*This column represents the number of questions on which the company was eligible to receive a score; i.e. where the company did not receive a score of N/A.

1. Leadership and Organisational Culture

Question
1.1. Does the company have a publicly stated anti-bribery and corruption commitment, which is authorised by its leadership?
Score
1
Comments
There is evidence that the company publishes a statement in support of ethical conduct and integrity, which is authorised and endorsed by the company's President and CEO. However, the company receives a score of '1' because this publicly available statement does not directly mention or address the company's commitment to anti-bribery and corruption.
Evidence
<p>[14] Standards of Business Conduct (Webpage) Accessed 19/11/2019 https://sbc.hpe.com/ At Hewlett Packard Enterprise, how we do things is just as important as what we do.</p> <p>The HPE Standards of Business Conduct governs our business practices and provides guidance for ethical decision-making. When following these standards, our collective conduct helps us achieve more as a team, and builds trust with our suppliers, partners, and customers.</p> <p>We aspire to ethical leadership, and we pride ourselves on winning the right way. Together, let's uphold our commitment to ethical behavior by acting with uncompromising integrity and respect every day.</p> <p>Antonio Neri, President and CEO</p> <p>[15] SBC - Message from the Chief Ethics and Compliance Officer (Webpage) Accessed 20/11/2019 https://sbc.hpe.com/en/message-from-our-chief-ethics-and-compliance-officer At HPE, our ethical conduct is a top priority. We act with honesty, integrity and respect, even as we compete to win.</p> <p>Our Standards of Business Conduct provides guidance for HPE employees across the globe: we are all bound by its rules, and we are all responsible for upholding its values. Read the Standards of Business Conduct, understand it, and when faced with tough situations, consult it for guidance. When you are unsure, reach out – to my team, to your leaders, or Human Resources – and ask for help.</p> <p>Finally, if you have concerns about conduct you see or hear about, please raise them through one of our many reporting channels. We take allegations seriously. We hold people accountable when we find misconduct. And we never tolerate retaliation against employees who speak up honestly and in good faith.</p> <p>Thank you for helping HPE win the right way.</p> <p>Glenn Leon</p> <p>[17] Our Ethical Conduct – We Follow the Law (Webpage) Accessed 20/11/19 https://sbc.hpe.com/en/we-are-an-ethical-company Standards of Business Conduct We are an ethical company</p> <p>Our ethical conduct</p> <p>HPE conducts business ethically – in all of the cultures and countries in which it operates – and with trust, respect, and integrity. All HPE employees must support this mission by abiding by the following principles:</p>

We do not bribe or accept kickbacks

You may never provide, offer, or accept bribes or other improper payments or inducements to win business. And you may not do so to improperly influence a business decision either. These rules apply to everyone, every day, even if it means losing business in the short-term.

[39] Living Progress Report 2018 (Document)

Accessed 25/11/2019

<https://assets.ext.hpe.com/is/content/hpedam/documents/a00069000-9999/a00069386/a00069386enw.pdf>

[p.1] CULTURE

Being a purpose-driven organization starts from the inside. Our HPE Board and executive committee firmly believe that trust, integrity, and strong environmental, social, and governance (ESG) performance are core to our business. We regularly discuss our ongoing efforts to build our culture, deepen our relationships with customers and partners, and bring to market innovative products and solutions which make our world better.

Our culture is centered on always doing the right thing. Good business always requires good judgment, and I continually stress the importance of “winning the right way.” Our culture must also be defined by our commitment to

and progress in building a diverse and inclusive environment for our global team members. Two-thirds of our business is outside the U.S.—and our people and insights should mirror that.

Our leaders and managers are now directly accountable for driving even-higher levels of inclusion and employee engagement, shaping an inclusive culture which will yield the innovative thinking needed to help our customers thrive.

[p.55] ETHICAL BEHAVIOUR

Maintaining the highest ethical standards requires everyone at HPE to take responsibility for their actions. Behaving with honesty and integrity is the right thing to do; it also supports the stability and sustainable growth of our business.

HPE has been recognized as one of the World’s Most Ethical Companies by the Ethisphere Institute. Anti-corruption program We do not tolerate corrupt behavior, including bribery or kickbacks, in any circumstance.

We comply with relevant laws in every country in which we do business, and we set and share our expectations with employees through our anti-corruption program.

[...]

HPE remains an active member of the World Economic Forum’s Partnering Against Corruption Initiative (PACI), committing to zero tolerance of corruption in all forms and engaging in a coordinated response to the challenges of corruption globally.

Question
1.2. Does the company have a comprehensive anti-bribery and corruption policy that explicitly applies to both of the following categories: a) All employees, including staff and leadership of subsidiaries and other controlled entities; b) All board members, including non-executive directors.
Score
2
Comments
<p>There is evidence that the company publishes an anti-bribery and corruption policy, which specifically prohibits bribery, payments to public officials, commercial bribery, and facilitation payments. This policy applies to all employees and board members as described in (a) and (b) in the question.</p>
Evidence
<p>[1] Anti-Corruption Policy (Document) Accessed 18/11/2019 https://h20195.www2.hpe.com/v2/GetDocument.aspx?docname=A00000574ENW</p> <p>[p.3] Guiding Principles</p> <p>At Hewlett Packard Enterprise (HPE), our integrity is non-negotiable—we do not tolerate bribery of any kind—and we will not knowingly facilitate any other party's corrupt conduct. We will never trade our integrity for a business opportunity. We believe it is important that public officials spend public money based on the merits of the deal, not for personal interests.</p> <p>We do not bribe You must not offer, promise, give, or accept money or anything of value to or from government officials, political parties, or commercial-sector (non-public sector) parties to improperly obtain or retain business, secure an improper advantage, or otherwise influence them to act improperly.</p> <p>We do not allow third parties to bribe on our behalf You may not use third parties to take actions that we cannot otherwise take ourselves. You must not ignore "red flags" that indicate that a third party may make illegal payments or engage in corrupt behavior on HPE's behalf.</p> <p>We do not engage in activities that create the appearance of impropriety We avoid the appearance of impropriety, even if the conduct is not specifically prohibited. We maintain accurate books and records You must fairly and accurately represent how we spend our money, no matter how large or small the transaction. You must comply with our record retention guidelines.</p> <p>We comply with local laws This Policy sets a global, minimum standard, and provides the underlying principles to help our employees, officers and directors uphold HPE's anti-corruption commitment. However, many countries have more restrictive rules and you must comply with those requirements as well.</p> <p>This Policy establishes HPE's global anti-corruption principles and applies to HPE employees worldwide. HPE employees may not deviate from HPE's Anti-Corruption Policy or any of the related policies without prior written authorization from the Chief Ethics & Compliance Officer.</p> <p>Violations of this Policy may lead to disciplinary action up to and including termination of employment with HPE.</p> <p>Any employee with knowledge or suspicion of any violations of this Policy must report these concerns to the Ethics & Compliance Office.</p> <p>[p.4] Providing and Receiving Things of Value</p> <p>We have a duty to spend resources in ethical ways. You may never provide or promise to provide anything of value to a third party to improperly influence a decision on their part. You may provide or accept gifts, meals, travel, entertainment and other items of value only when appropriate. You must never solicit any item of value from any third party. Gifts of nominal value are generally permitted, but cash and expensive or lavish items are not. You must not provide things of value too frequently to the same recipient, and you should never provide anything of value</p>

during a competitive bid process or a contract negotiation with the recipient's company. Items and activities that may cause embarrassment to HPE or damage HPE's reputation, such as sexually explicit items or items that involve gambling, are strictly prohibited to be provided to anybody.

[p.8] Facilitation Payments

HPE prohibits facilitation payments by HPE employees or by any third party on HPE's behalf. A facilitation, or "grease," payment is a payment, generally of low value, made to a government official to facilitate or expedite a routine, non-discretionary government activity that the official is required to perform as a matter of course. Examples of these activities include:

- Permits, licenses, or other documents that allow companies to conduct business in a particular country
- Processing of visas and work papers
- Inspections related to transit of goods, for example loading and unloading of cargo
- Certain one-time fees, such as a government-owned utility company activating a telephone line

The only circumstances when HPE permits a facilitation payment is when an HPE employee's health or safety is at risk (such as to expedite an evacuation or airlift for medical attention, or if threatened with a weapon), the person being asked to pay fears physical harm or imprisonment, and there is no safe alternative to complying with the demand.

You must report any demands for facilitation payments, including a demand or payment made by a third party acting on HPE's behalf. The report must be made to corporate.compliance.hpe@hpe.com, an HPE attorney or the Ethics & Compliance Office as soon as possible after the demand. Third parties working with HPE must comply with this policy, and HPE will not reimburse third parties for facilitation payments.

[5] 2019 Proxy Statement (Document)

Accessed 18/11/2019

<https://investors.hpe.com/financial/proxy-2019/interactive/proxy/images/HPE-Proxy2019.pdf>

[p.5] Hewlett Packard Enterprise board of directors

Board composition

Our Board was thoughtfully structured after a global search targeting world-class directors with the diversity of skills, experience, ethnicity, and gender resulting in exceptional leadership for HPE.

The selection criteria for our directors included:

- high professional and personal ethics and values consistent with our longstanding values and standards;

[p.27] Governance documents

We maintain a code of business conduct and ethics for directors, officers and employees known as our Standards of Business Conduct.

[p.28] Our Corporate Governance Guidelines contain the current Board membership criteria that apply to nominees recommended for a position on the Board. Under those criteria, members of the Board should have the highest professional and personal ethics and values, consistent with our long-standing values and standards.

[39] Living Progress Report 2018 (Document)

Accessed 25/11/2019

<https://assets.ext.hpe.com/is/content/hpedam/documents/a00069000-9999/a00069386/a00069386enw.pdf>

[p.55] Anti-corruption program

We do not tolerate corrupt behavior, including bribery or kickbacks, in any circumstance. We comply with relevant laws in every country in which we do business, and we set and share our expectations with employees through our anti-corruption program.

Our anti-corruption program includes:

- Policies that provide clear guidance, including the HPE Anti-Corruption Policy and the HPE Global Business Amenities Policy.

In 2018, we substantially updated both policies and accompanying FAQ guides for employees. These documents are available in 23 languages.

[p.56] Ethics and compliance program

We expect everyone involved in our business to behave responsibly and ethically, setting expectations and holding people accountable through relevant policies and procedures. We require compliance with the law and with our Standards of Business Conduct, which we recently revised to make more accessible and interactive, and we set specific requirements for suppliers, business partners, and contingent workers.

[22] SBC - We Win The Right Way (Webpage)

Accessed 22/11/2019

<https://sbc.hpe.com/en/we-win-the-right-way>

At HPE, we aspire to ethical leadership. We want to win the right way, every day. How do we live up to that aspiration?

We make ethical decisions.

We report misconduct, and we never retaliate.

And we cooperate with investigations and audits when we are called upon to do so.

Our collective good conduct and decision-making is important. When we act with integrity, we work better together and build trust with our suppliers, partners and customers.

To that end, our Standards of Business Conduct provide guidance for all HPE employees and for members of HPE's Board of Directors. Everyone must follow the rules articulated here and in the underlying policies referenced here. And because we take our commitment to ethical behavior seriously, violations of these rules can lead to disciplinary sanctions, including termination of employment.

[11] Corporate Governance Guidelines (Document)

Accessed 18/11/2019

<https://investors.hpe.com/~media/Files/H/HP-Enterprise-IR/documents/governance/hpe-corporate-governance-guidelines-updated-jan-2016.pdf>

[p.4] XI. Standards of Business Conduct

The Board expects all directors, as well as officers and employees, to display the highest standard of ethics, consistent with Hewlett Packard Enterprise's longstanding values and standards. Hewlett Packard Enterprise has and will continue to maintain a code of conduct, known as the "Standards of Business Conduct" that is applicable to directors, officers and employees. Directors are expected to comply with the letter and the spirit of the Standards of Business Conduct, to focus on areas of ethical risk, to report unethical conduct and to help foster a culture of honesty and accountability.

[19] US Public Sector Code of Conduct (Document)

Accessed 20/11/2019

<https://h20195.www2.hpe.com/V2/GetPDF.aspx/c04909622.pdf>

[p.2] Guidelines

Gifts, bribes, gratuities, and kickbacks

You may not offer, give or promise to give (directly or indirectly) anything of value to employees of the following institutions unless the recipient pays its fair market value:

- US. state, local or federal government
- Public higher education institution
- Public or private K-12 educational institution
- Public or private library This includes gifts, meals, entertainment or travel. The prohibition on gifts to private or public K-12 educational institutions and libraries includes those entities' board members, employees, officers, representatives, agents, consultants, or independent contractors.

You also may not offer, give, solicit, or receive any gift or other thing of value (directly or indirectly) to or from one of these entities in exchange for favorable treatment or advantage, or for the purpose of obtaining or attempting to influence the award of a contract or subcontract. See: U.S. Business Amenities Policy.

[p.3] Procurement integrity You may not knowingly obtain or attempt to obtain another contractor's bid or proposal information or the government's source selection information before the award of a government contract to which the information relates. Additionally, you may not attempt to influence an ongoing source selection by means other than the bid and proposal process.

The U.S. Procurement Integrity Act specifically prohibits any contractor from soliciting or obtaining certain nonpublic bid proposal, cost and pricing, and source selection information. This Act and various state and local variations also impose additional requirements on the management of certain information relating to government procurements. Also, you may not attempt to acquire another company's or person's proprietary information, either from the government or private entities, unless the government or other entity has been authorized to disclose it to you. See: Antitrust Basics and Procurement Integrity.

[2] Partner Code of Conduct (Document)

Accessed 18/11/2019

<https://www.hpe.com/us/en/pdfViewer.html?docId=a00042891&parentPage=/us/en/about/governance/policies&resourceTitle=Partner+Code+of+Conduct>

[p.2] Anti-Corruption Laws


Absolute Prohibition on Bribery HPE expects HPE Partners to uphold the highest standards of integrity in all business interactions. HPE has a zero tolerance policy prohibiting any and all forms of bribery, corruption, extortion, kickbacks and embezzlements. All HPE Partners are strictly prohibited from promising, offering, authorizing, giving or accepting anything of value, either directly or indirectly through a third party, in order to obtain or retain business, direct business to any person, or otherwise gain an improper advantage.

For purposes of this policy, "anything of value" includes, but is not limited to, gifts, favors, entertainment, and meals, regardless of their value. HPE Partners must comply with all applicable anti-corruption laws, including but not limited to the U.S. FCPA and the U.K. Bribery Act (collectively, the "Anti-Corruption Laws").

In addition to the AntiCorruption Laws, there may be other applicable local laws or regulations related to gifts to and entertainment of government officials and/or commercial entities. For example, in the United States and some other countries, gifts to and entertainment of federal, state, or local government officials may be strictly prohibited, regardless of intent. As an HPE Partner, you are required to comply with all applicable laws governing interactions with government officials. For the avoidance of doubt, HPE Partners are prohibited from promising, offering, authorizing, giving or accepting any "grease" or "facilitation payments" for routine government actions, even where permitted by the FCPA or local laws. HPE also prohibits HPE Partners, or their representatives or employees, from offering or providing cash or non-cash gifts, kickbacks, or entertainment to any HPE employee for any improper purpose, such as influencing him or her to take a course of action. HPE employees are similarly prohibited from soliciting such items. This prohibition extends to immediate family members of both HPE Partner employees or representatives and HPE employees.

Books and Records

HPE Partners are required to keep complete and accurate books and records regarding sales of HPE products and any and all transactions or other expenditures with respect to any HPE-related business. HPE Partners are expressly prohibited from engaging in false and/or misleading accounting practices, including but not limited to creating "slush funds" or similar improper financial practices. Such practice may also violate applicable laws, including the Anti-Corruption Laws.

Question
1.3. Does the board or a dedicated board committee provide oversight of the company's anti-bribery and corruption programme?
Score
2
Comments
<p>Based on publicly available information, there is evidence that the board-level Audit Committee is ultimately responsible for oversight of the company's anti-bribery and corruption programme. This includes reviewing reports from management on the programme's performance and the results of audits. In addition, there is evidence that the Audit Committee has the authority to require that any necessary changes to the programme are made.</p>
Evidence
<p>[39] Living Progress Report 2018 (Document) Accessed 25/11/2019 https://assets.ext.hpe.com/is/content/hpedam/documents/a00069000-9999/a00069386/a00069386enw.pdf [p.55]</p>  <p>The diagram illustrates the 'ETHICS & COMPLIANCE GOVERNANCE STRUCTURE'. At the top, the 'Audit Committee' and 'Board of Directors' are shown in grey boxes. Below them, the 'Chief Executive Officer' is in a teal box, followed by the 'Chief Legal and Administrative Officer' and 'Chief Ethics & Compliance Officer (Head of Ethics & Compliance Office)' in teal boxes. To the right, the 'Ethics & Compliance Committee (Chaired by Chief Ethics & Compliance Officer)' is in a teal box. At the bottom, 'Compliance Councils & Boards' and 'Ethics & Compliance Office' are in teal boxes. Lines indicate reporting and oversight relationships between these entities.</p>
<p>[6] Audit Committee Charter (Document) Accessed 18/11/2019 https://investors.hpe.com/~media/Files/H/HP-Enterprise-IR/documents/committees/audit-committee-charter-october2015.pdf [p.3] IV. Responsibilities</p> <p>The following responsibilities of the Committee are set forth as a guide to the Committee with the understanding that the Committee may alter or supplement them as appropriate under the circumstances to the extent permitted by applicable laws and listing standards.</p> <p>[p.5] 15. Compliance.</p> <p>The Committee will oversee Hewlett Packard Enterprise's ethics and compliance programs with respect to legal and regulatory requirements, and review with management and the Director of Internal Audit the results of their review of compliance with applicable laws, regulations and listing standards, Hewlett Packard Enterprise's Standards of Business Conduct and internal audit reports. The Chief Ethics and Compliance Officer shall have the express authority to communicate personally to the Committee, including authority to promptly communicate personally to the Committee on any matter involving criminal conduct or potential criminal conduct and authority to communicate no less than annually on the implementation and effectiveness of the ethics and compliance program.</p>
<p>[11] Corporate Governance Guidelines (Document) Accessed 18/11/2019 https://investors.hpe.com/~media/Files/H/HP-Enterprise-IR/documents/governance/hpe-corporate-governance-guidelines-updated-jan-2016.pdf [p.1] I. Role of the Board of Directors</p>

The Board of Directors oversees and provides policy guidance on the business and affairs of Hewlett Packard Enterprise. Among other things, the Board monitors overall corporate performance, the integrity of Hewlett Packard Enterprise's controls and the effectiveness of its legal, ethics and compliance programs. The Board selects the Chairman of the Board (the "Chairman"), if any, and the Chief Executive Officer (the "CEO") of Hewlett Packard Enterprise, elects officers, designates which executive officers are officers for purposes of Section 16 of the Securities Exchange Act of 1934, as amended ("Section 16 Officer"), and oversees management. The Board also oversees Hewlett Packard Enterprise's strategic and business planning process. This is generally a year-round process, which includes a Board review of Hewlett Packard Enterprise's updated Corporate Strategic Plan, its business plan, the next year's capital expenditures budget, and key financial and supplemental objectives. The Board also reviews and assesses risks facing Hewlett Packard Enterprise and management's approach to addressing such risks.

[p.4] XI. Standards of Business Conduct

The Board expects all directors, as well as officers and employees, to display the highest standard of ethics, consistent with Hewlett Packard Enterprise's longstanding values and standards. Hewlett Packard Enterprise has and will continue to maintain a code of conduct, known as the "Standards of Business Conduct" that is applicable to directors, officers and employees.

Directors are expected to comply with the letter and the spirit of the Standards of Business Conduct, to focus on areas of ethical risk, to report unethical conduct and to help foster a culture of honesty and accountability. Directors are encouraged to bring questions about particular circumstances to the attention of the Chairman, Chairman of the NGSR Committee, or Chairman of the Audit Committee, who may consult with Hewlett Packard Enterprise attorneys or outside counsel, as appropriate. The Board also expects directors, officers and employees to acknowledge their adherence to the Standards of Business Conduct on an annual basis. The Audit Committee periodically reviews compliance with the Standards of Business Conduct.

[5] 2019 Proxy Statement (Document)

Accessed 18/11/2019


<https://investors.hpe.com/financial/proxy-2019/interactive/proxy/images/HPE-Proxy2019.pdf>

[p.86] Audit Committee composition

The Audit Committee of Hewlett Packard Enterprise is composed of four directors, Michael J. Angelakis, Pamela L. Carter, Jean M. Hobby, and Mary Agnes Wilderotter. Mrs. Wilderotter serves as the Chair of the Audit Committee. Every member of the Audit Committee is independent and three, including the Chair, are audit experts.

Audit Committee oversight

The purpose of the Audit Committee is to represent and assist the Board of Directors in fulfilling its responsibilities for generally overseeing our financial reporting process and financial statements, as well as compliance with legal and regulatory requirements, the independent registered public accounting firm's qualifications and independence, the performance of our internal audit function and independent registered public accounting firm, and risk assessment and risk management. The Audit Committee, at its discretion, may request a review of any issue it deems necessary to ensure the integrity of the Company's financial statements, adherence to regulatory requirements, or adherence with the Company's ERM program. The Audit Committee has the authority to obtain advice and assistance from outside legal, accounting or other advisors as the Audit Committee deems necessary to carry out its duties and receives appropriate funding, as determined by the Audit Committee, from Hewlett Packard Enterprise for such advice and assistance.

Question
1.4. Is responsibility for implementing and managing the company's anti-bribery and corruption programme ultimately assigned to a senior executive, and does he or she have a direct reporting line to the board or board committee providing oversight of the company's programme?
Score
2
Comments
Based on publicly available information, there is evidence that a designated senior executive – the Chief Ethics and Compliance Officer – has ultimate responsibility for implementing and managing the company's anti-bribery and corruption programme. It is clear that this individual has a direct reporting line to the board-level Audit Committee which provides oversight of the anti-bribery and corruption programme. There is evidence of reporting and feedback activities between this person and the Audit Committee.
Evidence
<p>[39] Living Progress Report 2018 (Document) Accessed 25/11/2019 https://assets.ext.hpe.com/is/content/hpedam/documents/a00069000-9999/a00069386/a00069386enw.pdf [p.55]</p>  <p>The diagram illustrates the 'ETHICS & COMPLIANCE GOVERNANCE STRUCTURE'. At the top, the 'Audit Committee' and 'Board of Directors' are shown in grey boxes. The 'Board of Directors' has a direct line to the 'Chief Executive Officer' (CEO), who is in a teal box. Below the CEO is the 'Chief Legal and Administrative Officer' (also in a teal box). Below that is the 'Chief Ethics & Compliance Officer (Head of Ethics & Compliance Office)' in a teal box. To the right of the CEO is the 'Ethics & Compliance Committee (Chaired by Chief Ethics & Compliance Officer)' in a teal box. Below the Chief Ethics & Compliance Officer are two boxes: 'Compliance Councils & Boards' on the left and 'Ethics & Compliance Office' on the right, both in teal boxes. Lines indicate reporting relationships: from the Board of Directors to the CEO; from the CEO to the Chief Legal and Administrative Officer; from the Chief Legal and Administrative Officer to the Chief Ethics & Compliance Officer; from the Chief Ethics & Compliance Officer to the Compliance Councils & Boards and the Ethics & Compliance Office; and from the Ethics & Compliance Committee to the Chief Ethics & Compliance Officer. There is also a line from the Audit Committee to the Chief Ethics & Compliance Officer.</p> <p>[p.56] Our Ethics and Compliance Committee and our Audit Committee oversee our approach to ethical conduct, with the HPE Board of Directors taking ultimate responsibility.</p> <p>[6] Audit Committee Charter (Document) Accessed 18/11/2019 https://investors.hpe.com/~media/Files/H/HP-Enterprise-IR/documents/committees/audit-committee-charter-october2015.pdf [p.5] 15. Compliance.</p> <p>The Committee will oversee Hewlett Packard Enterprise's ethics and compliance programs with respect to legal and regulatory requirements, and review with management and the Director of Internal Audit the results of their review of compliance with applicable laws, regulations and listing standards, Hewlett Packard Enterprise's Standards of Business Conduct and internal audit reports. The Chief Ethics and Compliance Officer shall have the express authority to communicate personally to the Committee, including authority to promptly communicate personally to the Committee on any matter involving criminal conduct or potential criminal conduct and authority to communicate no less than annually on the implementation and effectiveness of the ethics and compliance program.</p> <p>[8] Chief Legal Officer Bio (Webpage) Accessed 18/11/2019 https://www.hpe.com/emea_europe/en/leadership-bios/john-schultz.html Chief Legal and Administrative Officer and Corporate Secretary, Office of Legal and Administrative Affairs John Schultz is Executive Vice President, Chief Legal and Administrative Officer and Corporate Secretary for Hewlett Packard Enterprise.</p>

In this role, John heads the Office of Legal and Administrative Affairs, which comprises a variety of organisations including the Legal Department, Ethics and Compliance Office, Global Corporate Services, Corporate Affairs, Cyber Security, Global Security Services and Aviation.

John was appointed general counsel of Hewlett-Packard Co. in 2012 and became general counsel of Hewlett Packard Enterprise after HP separated into two separate companies in the autumn of 2015. John joined HP in 2008, serving as deputy general counsel for litigation, investigations and global functions.

[15] SBC - Message from the Chief Ethics and Compliance Officer (Webpage)

Accessed 20/11/2019

<https://sbc.hpe.com/en/message-from-our-chief-ethics-and-compliance-officer>

Read the Standards of Business Conduct, understand it, and when faced with tough situations, consult it for guidance. When you are unsure, reach out – to my team, to your leaders, or Human Resources – and ask for help.

Finally, if you have concerns about conduct you see or hear about, please raise them through one of our many reporting channels. We take allegations seriously. We hold people accountable when we find misconduct. And we never tolerate retaliation against employees who speak up honestly and in good faith.

[1] Anti-Corruption Policy (Document)

Accessed 18/11/2019

<https://h20195.www2.hpe.com/v2/GetDocument.aspx?docname=A00000574ENW>

[p.3] This Policy establishes HPE's global anti-corruption principles and applies to HPE employees worldwide. HPE employees may not deviate from HPE's Anti-Corruption Policy or any of the related policies without prior written authorization from the Chief Ethics & Compliance Officer.

[p.12] Organization - Office of Legal and Administrative Affairs

Sponsor - Glenn Leon, Senior Vice President and Chief Ethics & Compliance Officer

Contact - Matt Cohen, Director and Managing Counsel, Anti-Corruption

Phone +1 757 448 2840

Email - mcohen@hpe.com

2. Internal Controls

Question
2.1. Is the design and implementation of the anti-bribery and corruption programme tailored to the company based on an assessment of the corruption and bribery risks it faces?
Score
2
Comments
Based on publicly available information, there is evidence that the company has a formal risk assessment procedure in place that informs the design of its ethics and compliance programme. The results of risk assessments are reviewed by the board's Audit Committee on at least an annual basis. There is evidence that the results of such reviews are used to update specific parts of the company's ethics and compliance programme.
Evidence
<p>[5] 2019 Proxy Statement (Document) Accessed 18/11/2019 https://investors.hpe.com/financial/proxy-2019/interactive/proxy/images/HPE-Proxy2019.pdf [p.86] Committee meetings</p> <p>The Audit Committee disposes of its duties through a series of regularly-scheduled meetings, including dedicated meetings to review quarterly earnings releases and financial filings with the SEC, and regular communications from the Company on material risk oversight matters. At least six Audit Committee meetings are held each year. During fiscal 2018, the Audit Committee met a total of 11 times. The Audit Committee reviews and discusses a number of different topics and items of business in meetings including, but not limited to, annual risk management overviews, cyber security, internal audit matters, Sarbanes-Oxley 404 plan matters, ethics and compliance trends and matters, earnings releases, auditor updates, required disclosures, and business segment specific risk reviews. Management, internal audit, and EY are invited to attend committee meetings and present on these topics as well as internal and external audit plans and budget forecasts. The Audit Committee regularly meets in separate executive sessions at which only members are present and in private sessions with each of management, the internal auditors, and the independent registered public accounting firm. During fiscal 2018, the Audit Committee held seven executive sessions, six private sessions with management, seven private sessions with the head of internal audit, and seven private sessions with EY.</p> <p>[11] Corporate Governance Guidelines (Document) Accessed 18/11/2019 https://investors.hpe.com/~media/Files/H/HP-Enterprise-IR/documents/governance/hpe-corporate-governance-guidelines-updated-jan-2016.pdf [p.1] I. Role of the Board of Directors</p> <p>The Board of Directors oversees and provides policy guidance on the business and affairs of Hewlett Packard Enterprise. Among other things, the Board monitors overall corporate performance, the integrity of Hewlett Packard Enterprise's controls and the effectiveness of its legal, ethics and compliance programs. The Board selects the Chairman of the Board (the "Chairman"), if any, and the Chief Executive Officer (the "CEO") of Hewlett Packard Enterprise, elects officers, designates which executive officers are officers for purposes of Section 16 of the Securities Exchange Act of 1934, as amended ("Section 16 Officer"), and oversees management. The Board also oversees Hewlett Packard Enterprise's strategic and business planning process. This is generally a year-round process, which includes a Board review of Hewlett Packard Enterprise's updated Corporate Strategic Plan, its business plan, the next year's capital expenditures budget, and key financial and supplemental objectives. The Board also reviews and assesses risks facing Hewlett Packard Enterprise and management's approach to addressing such risks.</p>

[6] Audit Committee Charter (Document)**Accessed 18/11/2019**
<https://investors.hpe.com/~media/Files/H/HP-Enterprise-IR/documents/committees/audit-committee-charter-october2015.pdf>

[p.3] IV. Responsibilities

The following responsibilities of the Committee are set forth as a guide to the Committee with the understanding that the Committee may alter or supplement them as appropriate under the circumstances to the extent permitted by applicable laws and listing standards.

[p.5] 15. Compliance.

The Committee will oversee Hewlett Packard Enterprise's ethics and compliance programs with respect to legal and regulatory requirements, and review with management and the Director of Internal Audit the results of their review of compliance with applicable laws, regulations and listing standards, Hewlett Packard Enterprise's Standards of Business Conduct and internal audit reports. The Chief Ethics and Compliance Officer shall have the express authority to communicate personally to the Committee, including authority to promptly communicate personally to the Committee on any matter involving criminal conduct or potential criminal conduct and authority to communicate no less than annually on the implementation and effectiveness of the ethics and compliance program.

[p.6] 18. Risks.

The Committee will review the results of significant to addressing these risks, including significant risks or exposures relating to litigation and other proceedings and regulatory matters that may have a significant impact on Hewlett Packard Enterprise's financial statements, and discuss policies with respect to risk assessment and risk management.

[2] Partner Code of Conduct (Document)**Accessed 18/11/2019**
<https://www.hpe.com/us/en/pdfViewer.html?docId=a00042891&parentPage=/us/en/about/governance/policies&resourceTitle=Partner+Code+of+Conduct>

[p.4] Business Controls

HPE Partners must maintain or where necessary establish effective business controls that are capable of preventing and detecting unlawful conduct by their employees and counterparties. By way of guidance,

[p.5] an effective business controls program typically contains at least the following components:

(i) periodic risk assessments that lead to adjustments in their business controls that take into account the current risk environment;

[39] Living Progress Report 2018 (Document)**Accessed 25/11/2019**
<https://assets.ext.hpe.com/is/content/hpedam/documents/a00069000-9999/a00069386/a00069386enw.pdf>

[p.55] Our anti-corruption program includes:

[...]

- Process controls to review higher-risk transactions and screen third-party partners. We identify countries at a high risk for corruption based in part on Transparency International's Corruption Perceptions Index. We audit the controls, and in 2018, we expanded our audit program to conduct more sophisticated and complex audits and to test new areas of risk.

Question
2.2. Is the company's anti-bribery and corruption programme subject to regular internal or external audit, and are policies and procedures updated according to audit recommendations?
Score
2
Comments
<p>Based on publicly available information, there is evidence that the company's ethics and compliance programme is subject to a regular audit process. The company indicates that it conducts audits on an annual basis and that the results are reviewed by the board-level Audit Committee, which provides oversight of the compliance programme. There is evidence to indicate that the company's Ethics & Compliance Office is tasked with implementing planned updates and improvements to the ethics and compliance programme.</p>
Evidence
<p>[6] Audit Committee Charter (Document) Accessed 18/11/2019 https://investors.hpe.com/~media/Files/H/HP-Enterprise-IR/documents/committees/audit-committee-charter-october2015.pdf [p.3] IV. Responsibilities</p> <p>The following responsibilities of the Committee are set forth as a guide to the Committee with the understanding that the Committee may alter or supplement them as appropriate under the circumstances to the extent permitted by applicable laws and listing standards.</p> <p>[p.5] 11. Internal Controls. The Committee will review the adequacy and effectiveness of Hewlett Packard Enterprise's internal controls, including any significant deficiencies in such controls and significant changes or material weaknesses in such controls reported by the independent registered public accounting firm, the internal auditors or management, any special audit steps adopted in light of material control deficiencies, and any fraud, whether or not material, that involves management or other Hewlett Packard Enterprise employees who have a significant role in such controls.</p> <p>[...]</p> <p>13. Internal Audit. The Committee will review the overall scope, qualifications, resources, activities, reports, organizational structure and effectiveness of the internal audit function.</p> <p>[...]</p> <p>15. Compliance. The Committee will oversee Hewlett Packard Enterprise's ethics and compliance programs with respect to legal and regulatory requirements, and review with management and the Director of Internal Audit the results of their review of compliance with applicable laws, regulations and listing standards, Hewlett Packard Enterprise's Standards of Business Conduct and internal audit reports. The Chief Ethics and Compliance Officer shall have the express authority to communicate personally to the Committee, including authority to promptly communicate personally to the Committee on any matter involving criminal conduct or potential criminal conduct and authority to communicate no less than annually on the implementation and effectiveness of the ethics and compliance program.</p> <p>[36] Corporate Ethics (Webpage) Accessed 25/11/2019 https://www.hpe.com/us/en/about/governance/ethics.html We also benchmark our program with those of other companies to identify potential improvements. This information helps us to prioritize employee education and training efforts and focus our audits and assessments of our own operations as well as our suppliers and partners.</p> <p>[39] Living Progress Report 2018 (Document) Accessed 25/11/2019 https://assets.ext.hpe.com/is/content/hpedam/documents/a00069000-9999/a00069386/a00069386enw.pdf [p.55] Our anti-corruption program includes:</p>

[...]

• Process controls to review higher-risk transactions and screen third-party partners. We identify countries at a high risk for corruption based in part on Transparency International's Corruption Perceptions Index. We audit the controls, and in 2018, we expanded our audit program to conduct more sophisticated and complex audits and to test new areas of risk.

[...]



[44] Updated Corporate Ethics Page (Webpage)

Accessed 18/06/2020

<https://www.hpe.com/us/en/about/governance/ethics.html#Anticorruption>

HPE's Ethics & Compliance Office (ECO) has a dedicated anti-corruption team staffed with specialized attorneys, auditors, and compliance professionals. This team is responsible for implementing our anti-corruption compliance program and updating and enhancing the company's anti-corruption policies and processes, in partnership with other global functions and business units.

Question
2.3. Does the company have a system for tracking, investigating and responding to bribery and corruption allegations or incidents, including those reported through whistleblowing channels?
Score
1
Comments
<p>There is evidence that the company publicly commits to investigating incidents, and that it has a specific procedure in place to deal with whistleblowing cases. There is evidence that the information on each investigation is documented and that summary information on investigations is reviewed centrally on a regular basis.</p> <p>However, the company receives a score of '1' because it does not provide publicly available information on the whole investigation process from receipt to final outcome. There is also no evidence that it takes steps to ensure the independence of its investigations, for example by stating that cases are handled by an independent team or that staff conducting investigations report to an independent board member. There is also no clear evidence that the company commits to providing whistleblowers with updates on the outcome of investigations.</p>
Evidence
<p>[7] Report an Ethics Concern (Webpage) Accessed 18/11/2019 https://www.hpe.com/us/en/about/governance/report-ethics-concerns.html We encourage anyone with a concern to speak up and report things that don't seem right. We provide multiple channels, making it easy to ask questions or report a concern. Use any of the options listed on this page when you have questions or concerns about a potential violation of law, company policy, or HPE's Standards of Business Conduct.</p> <p>Reports are kept confidential and can even be submitted anonymously. We take each and every report seriously; we review every concern raised, respond promptly and investigate alleged violations as appropriate.</p> <p>[6] Audit Committee Charter (Document) Accessed 18/11/2019 https://investors.hpe.com/~media/Files/H/HP-Enterprise-IR/documents/committees/audit-committee-charter-october2015.pdf [p.2] III. Procedures</p> <p>1. Number of Meetings. The Committee will convene at least six times each year, with additional meetings as appropriate</p> <p>[p.3] IV. Responsibilities</p> <p>The following responsibilities of the Committee are set forth as a guide to the Committee with the understanding that the Committee may alter or supplement them as appropriate under the circumstances to the extent permitted by applicable laws and listing standards.</p> <p>[p.5] 15. Compliance.</p> <p>[...]</p> <p>The Chief Ethics and Compliance Officer shall have the express authority to communicate personally to the Committee, including authority to promptly communicate personally to the Committee on any matter involving criminal conduct or potential criminal conduct and authority to communicate no less than annually on the implementation and effectiveness of the ethics and compliance program.</p> <p>[p.6] 20. Investigations.</p> <p>The Committee will conduct or authorize investigations into any matters within the Committee's scope of responsibilities.</p>

[2] Partner Code of Conduct (Document)**Accessed 18/11/2019**
<https://www.hpe.com/us/en/pdfViewer.html?docId=a00042891&parentPage=/us/en/about/governance/policies&resourceTitle=Partner+Code+of+Conduct>

[p.5] Investigations and HPE's Ongoing Monitoring of the HPE Partners' Compliance

HPE Partners must, consistent with applicable laws and contractual obligations, provide reasonable assistance to any investigation by HPE of a violation of this Partner Code of Conduct or of a violation by an HPE employee of HPE's Standards of Business Conduct if related to the HPE Partners' business or applicable laws relevant to their HPE Partner status, and to allow HPE reasonable access to all documentation concerning the HPE Partners' compliance with this Partner Code of Conduct and laws applicable to their sale and distribution of HPE products.

[24] SBC - We Win The Right Way – Report Concerns And Do Not Retaliate (Webpage)**Accessed 22/11/2019**
<https://sbc.hpe.com/en/we-win-the-right-way>

Every employee has a responsibility to report misconduct promptly.

If you are aware of misconduct, use the Open Door Policy to raise concerns with your manager, HR, your local SBC team, or the Ethics and Compliance Office.

HPE does not tolerate retaliation against anyone who raises a concern honestly and in good faith.

Q: What do we expect from managers?

Managers must demonstrate ethical leadership and cultivate a work environment that promotes integrity, trust, and respect. Managers must provide proper guidance to employees and take appropriate action to prevent, detect, and respond to misconduct. And managers must encourage open and honest communication, and ensure that employees can ask questions or raise concerns without fear of retaliation.

Q: Do I need to report misconduct that was committed by a supplier, partner, or customer?

Yes. If you are aware of misconduct, even if the action was taken by a supplier, partner, or customer, rather than an employee, you still must report it.

Related Content

Global Open Door Policy

Investigations FAQs

[36] Corporate Ethics (Webpage)**Accessed 25/11/2019**
<https://www.hpe.com/us/en/about/governance/ethics.html>

We respond swiftly to violations and have systems in place for reporting and resolving ethical concerns, in line with our policies and local laws.

[39] Living Progress Report 2018 (Document)**Accessed 25/11/2019**
<https://assets.ext.hpe.com/is/content/hpedam/documents/a00069000-9999/a00069386/a00069386enw.pdf>

[p.56] If something is not right, we want to know. We encourage anyone with a concern or question about business conduct to raise it via one of our reporting channels, without fear of reprisal. Reports are confidential and can be made anonymously where local law allows.

For each report made, we:

- Add a record to our global case management system, which we use to identify trends and priorities
- Review and respond promptly
- Conduct any required investigations appropriately, carrying out disciplinary or remedial action when needed

We track the nature of ethics and compliance items reported to us each year.

In 2018, the majority of items related to labor law.

Question
2.4. Does the company have appropriate arrangements in place to ensure the quality of investigations?
Score
0
Comments
There is no publicly available evidence that the company assures itself of the quality of investigations, for example by indicating that staff conducting investigations are properly trained, by implementing a policy to handle complaints about the process or by reviewing the investigation process every three years.
Evidence
<p>[6] Audit Committee Charter (Document) Accessed 18/11/2019 https://investors.hpe.com/~media/Files/H/HP-Enterprise-IR/documents/committees/audit-committee-charter-october2015.pdf [p.6] 16. Complaints and Submissions.</p> <p>The Committee will oversee procedures established for the receipt, retention and treatment, including investigation, of complaints regarding the federal securities laws, including accounting, internal accounting controls and auditing matters, as well as for confidential, anonymous submissions by Hewlett Packard Enterprise's employees of concerns regarding such matters and compliance with the Standards of Business Conduct.</p>

Question
2.5. Does the company's investigative procedure include a commitment to report material findings of bribery and corruption to the board and any criminal conduct to the relevant authorities?
Score
1
Comments
<p>Based on publicly available information, there is evidence that the company commits to report material findings of criminal conduct to the board-level Audit Committee. However, there is no evidence that an appropriate senior individual is responsible for ensuring that the disclosure of criminal offences to relevant authorities is evaluated and acted upon if necessary.</p>
Evidence
<p>[11] Corporate Governance Guidelines (Document) Accessed 18/11/2019 https://investors.hpe.com/~media/Files/H/HP-Enterprise-IR/documents/governance/hpe-corporate-governance-guidelines-updated-jan-2016.pdf [p.4] XI. Standards of Business Conduct</p> <p>[...]</p> <p>Directors are expected to report any possible conflict of interest between the director and Hewlett Packard Enterprise or any violation of the Standards of Business Conduct to the Chairman, or Chairman of the NGSRC Committee, who will review the matter and take appropriate action.</p> <p>[6] Audit Committee Charter (Document) Accessed 18/11/2019 https://investors.hpe.com/~media/Files/H/HP-Enterprise-IR/documents/committees/audit-committee-charter-october2015.pdf [p.5] 15. Compliance.</p> <p>[...]</p> <p>The Chief Ethics and Compliance Officer shall have the express authority to communicate personally to the Committee, including authority to promptly communicate personally to the Committee on any matter involving criminal conduct or potential criminal conduct and authority to communicate no less than annually on the implementation and effectiveness of the ethics and compliance program.</p> <p>[p.6] 17. Attorneys' Reports. The Committee will receive and, if appropriate, respond to attorneys' reports of evidence of material violations of securities laws and breaches of fiduciary duty and similar violations of U.S. or state law.</p> <p>[...]</p> <p>19. Regulatory Investigations.</p> <p>The Committee will review the results of significant investigations, examinations or reviews performed by regulatory authorities and management's response.</p>

Question																								
2.6. Does the company publish high-level results from incident investigations and disciplinary actions against its employees?																								
Score																								
1																								
Comments																								
<p>The company publishes some high-level information on bribery and corruption-related incidents reported to its Standards of Business Conduct team. This data relates to the most recent reporting year and there is evidence indicating that it is updated annually.</p> <p>However, the company receives a score of '1' because it is unclear whether the data includes the number of reports received via whistleblowing channels. There is also no evidence that the company publishes information on the number of investigations launched or the number of disciplinary actions as a result of investigation findings.</p>																								
Evidence																								
<p>[43] 2018 Living Progress Data Summary (Document) Accessed 18/06/2020 https://h20195.www2.hpe.com/v2/Getdocument.aspx?docname=a00071279enw# [p.16]</p> <p>BREACHES OF ETHICAL BEHAVIOR Items reported to the HPE global Standards of Business Conduct team or other compliance functions in 2018.</p> <table><tr><th></th><th>2018</th></tr><tr><td>Labor Law/HR</td><td>40%</td></tr><tr><td>Misuse of assets</td><td>22%</td></tr><tr><td>Conflicts of interest</td><td>8%</td></tr><tr><td>Anti-corruption⁵²</td><td>7%</td></tr><tr><td>Reporting</td><td>5%</td></tr><tr><td>Fraud</td><td>4%</td></tr><tr><td>Workplace security and theft</td><td>3%</td></tr><tr><td>Confidentiality</td><td>3%</td></tr><tr><td>Gray marketing/channel</td><td>3%</td></tr><tr><td>Failure to make ethical decisions</td><td>3%</td></tr><tr><td>Competition</td><td>2%</td></tr></table>		2018	Labor Law/HR	40%	Misuse of assets	22%	Conflicts of interest	8%	Anti-corruption ⁵²	7%	Reporting	5%	Fraud	4%	Workplace security and theft	3%	Confidentiality	3%	Gray marketing/channel	3%	Failure to make ethical decisions	3%	Competition	2%
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<p>⁵² The anti-corruption category is broadly defined and includes allegations of commercial bribery, kickbacks, and certain Global Business Amenities Policy violations, as well as alleged corruption related to foreign public officials.</p>																								
<p>[39] Living Progress Report 2018 (Document) Accessed 25/11/2019 https://assets.ext.hpe.com/is/content/hpedam/documents/a00069000-9999/a00069386/a00069386enw.pdf [p.56] If something is not right, we want to know. We encourage anyone with a concern or question about business conduct to raise it via one of our reporting channels, without fear of reprisal. Reports are confidential and can be made anonymously where local law allows.</p> <p>For each report made, we:</p> <ul style="list-style-type: none">• Add a record to our global case management system, which we use to identify trends and priorities• Review and respond promptly• Conduct any required investigations appropriately, carrying out disciplinary or remedial action when needed																								

We track the nature of ethics and compliance items reported to us each year.

In 2018, the majority of items related to labor law.

3. Support to Employees

Question
3.1. Does the company provide training on its anti-bribery and corruption programme to all employees across all divisions and geographies, and in all appropriate languages?
Score
2
Comments
<p>Based on publicly available information, there is evidence that the company provides training to all employees that outlines the principles of its anti-bribery and corruption policy, including the whistleblowing options available. The company states that it provides training in all appropriate languages and that employees are required to take an anti-corruption refresher course annually.</p>
Evidence
<p>[44] Updated Corporate Ethics Page (Webpage) Accessed 18/06/2020 https://www.hpe.com/us/en/about/governance/ethics.html#Anticorruption HPE provides anti-corruption training to all employees annually as part of its Standards of Business Conduct training. We provide this training in twenty different languages: English, French, Italian, German, Spanish, Japanese, Chinese (simplified), Chinese (traditional), Korean, Vietnamese, Portuguese, Dutch, Bulgarian, Czech, Hungarian, Arabic, Russian, Hebrew, Indonesian, and Polish.</p> <p>[39] Living Progress Report 2018 (Document) Accessed 25/11/2019 https://assets.ext.hpe.com/is/content/hpedam/documents/a00069000-9999/a00069386/a00069386enw.pdf [p.55] Our anti-corruption program includes:</p> <p>[...]</p> <ul style="list-style-type: none"> • Tools and training to help employees identify and avoid potential issues, including the Amenities Approval Tool (AAT). <p>[p.56] Training and communication</p> <p>We reinforce and support our ethics and compliance programs with regular training and communications. We evaluate and update training and communications each year to ensure we address trends and areas for improvement.</p> <p>Our training and communications are relevant, timely, and tailored to employee roles. Our program includes the following:</p> <ul style="list-style-type: none"> • Training on our Standards of Business Conduct (SBC)—All employees must complete the annual SBC refresher course, which covers key policies, procedures, and high-risk issues. Board members take SBC training every two years. New hires complete an SBC course within 30 days of joining HPE. • Internal ethics and compliance social media platform—Part of our internal social network Connect Now, the platform allows our employees to ask questions, access resources, and debate ethics and compliance issues. • Ethics Road Show—The Road Show connects senior members of the Ethics and Compliance Office (ECO) with HPE business leaders in our regions. This face-to-face contact helps to strengthen our culture of ethical conduct and enables ECO to remain alert to real-life challenges and successes across our business. <p>We also communicate with employees on important ethics and compliance issues throughout the year through targeted email messages, videos, and live training sessions which were conducted in over 20 countries in 2018.</p>

[1] Anti-Corruption Policy (Document)**Accessed 18/11/2019**<https://h20195.www2.hpe.com/v2/GetDocument.aspx?docname=A00000574ENW>

[p.12] Mergers and Acquisitions

Mergers and acquisitions present business opportunities for HPE, as well as risks. For example, HPE can be held accountable for the actions of an acquired company, so we must conduct anti-corruption due diligence, both before and after the acquisition, to evaluate the target company's internal controls and third-party relationships. As part of the integration, HPE will begin moving the third parties onto HPE contractual terms and conditions where appropriate. HPE also incorporates the acquired company into our ethics and compliance program and provides training to the acquired company employees as soon as practicable after the acquisition.

[2] Partner Code of Conduct (Document)**Accessed 18/11/2019**<https://www.hpe.com/us/en/pdfViewer.html?docId=a00042891&parentPage=/us/en/about/governance/policies&resourceTitle=Partner+Code+of+Conduct>

[p.1] HPE expects its Partners to maintain the highest standards of business ethics; become familiar with and comply with all laws that are relevant to their HPE Partner status, including the extraterritorial laws that govern the conduct of HPE, such as the United States Foreign Corrupt Practices Act ("FCPA"), the U.K. Bribery Act, and similar anti-corruption laws of other countries where the Partner does business or which otherwise apply to the Partner; and stay abreast of all legal and regulatory changes that are relevant to their HPE Partner status.

Further, HPE requires that HPE Partners

[...]

(5) provide certification of their compliance with these laws and complete all related HPE training and due diligence as and when requested by HPE.

[p.4] Business Controls

HPE Partners must maintain or where necessary establish effective business controls that are capable of preventing and detecting unlawful conduct by their employees and counterparties. By way of guidance,

[p.5] an effective business controls program typically contains at least the following components:

[...]

(v) training and continuing advice regarding the legal and ethics compliance programs and HPE Partner policies and procedures;

[36] Corporate Ethics (Webpage)**Accessed 25/11/2019**<https://www.hpe.com/us/en/about/governance/ethics.html>

We also benchmark our program with those of other companies to identify potential improvements. This information helps us to prioritize employee education and training efforts and focus our audits and assessments of our own operations as well as our suppliers and partners.

Question
3.2. Does the company provide tailored training on its anti-bribery and corruption programme for at least the following categories of employees: a) Employees in high risk positions, b) Middle management, c) Board members.
Score
1
Comments
<p>Based on publicly available information, there is evidence that the company provides tailored anti-bribery and corruption training to employees based on an assessment of their role and exposure to corruption risk. The company indicates that it provides tailored training to employees in high-risk positions, as well as senior business leaders which can be understood to include middle management.</p> <p>However, the company receives a score of '1' because there is no publicly available evidence that board members receive tailored anti-corruption training. It is also unclear whether tailored training for employees in high-risk positions is updated on at least an annual basis.</p>
Evidence
<p>[44] Updated Corporate Ethics Page (Webpage) Accessed 18/06/2020 https://www.hpe.com/us/en/about/governance/ethics.html#Anticorruption ECO regularly presents "ethics roadshows" to senior business leaders in countries around the globe in live meetings to discuss anti-corruption and other top risk areas, investigations trends and the importance of a strong tone from the top. ECO also presents live and virtual trainings on anti-corruption compliance to groups of employees in high-risk areas, using current and refreshed content.</p> <p>[39] Living Progress Report 2018 (Document) Accessed 25/11/2019 https://assets.ext.hpe.com/is/content/hpedam/documents/a00069000-9999/a00069386/a00069386enw.pdf [p.55] Our anti-corruption program includes:</p> <p>[...]</p> <ul style="list-style-type: none"> • Tools and training to help employees identify and avoid potential issues, including the Amenities Approval Tool (AAT). <p>[p.56] Training and communication</p> <p>We reinforce and support our ethics and compliance programs with regular training and communications. We evaluate and update training and communications each year to ensure we address trends and areas for improvement.</p> <p>Our training and communications are relevant, timely, and tailored to employee roles. Our program includes the following:</p> <ul style="list-style-type: none"> • Training on our Standards of Business Conduct (SBC)—All employees must complete the annual SBC refresher course, which covers key policies, procedures, and high-risk issues. Board members take SBC training every two years. New hires complete an SBC course within 30 days of joining HPE.

Question
3.3. Does the company measure and review the effectiveness of its anti-bribery and corruption communications and training programme?
Score
2
Comments
Based on publicly available information, there is evidence the company reviews the effectiveness of its anti-bribery and corruption communications and personnel training programme annually. There is evidence that the company has a system to do this, using data from compliance-related reviews. It is clear that the results of such reviews are used to update specific parts of the company's anti-bribery and corruption communications and training programme.
Evidence
<p>[36] Corporate Ethics (Webpage) Accessed 25/11/2019 https://www.hpe.com/us/en/about/governance/ethics.html We also benchmark our program with those of other companies to identify potential improvements. This information helps us to prioritize employee education and training efforts and focus our audits and assessments of our own operations as well as our suppliers and partners.</p> <p>[39] Living Progress Report 2018 (Document) Accessed 25/11/2019 https://assets.ext.hpe.com/is/content/hpedam/documents/a00069000-9999/a00069386/a00069386enw.pdf [p.55] Our anti-corruption program includes:</p> <p>[...]</p> <p>Tools and training to help employees identify and avoid potential issues, including the Amenities Approval Tool (AAT). We strengthened the amenities approval process this year by improving data collection and reporting within the AAT and by updating training for users and approvers.</p> <p>[p.56] Training and communication</p> <p>We reinforce and support our ethics and compliance programs with regular training and communications. We evaluate and update training and communications each year to ensure we address trends and areas for improvement.</p> <p>Our training and communications are relevant, timely, and tailored to employee roles.</p>

Question
3.4. Does the company ensure that its employee incentive schemes are designed in such a way that they promote ethical behaviour and discourage corrupt practices?
Score
0
Comments
There is no publicly available evidence that the company's incentive schemes employees incorporate ethical or anti-bribery and corruption principles.
Evidence
No evidence found.

Question
3.5. Does the company commit to and assure itself that it will support and protect employees who refuse to act unethically, even when it might result in a loss of business?
Score
1
Comments
<p>Based on publicly available information, there is evidence that the company will support employees who refuse to act unethically, even when it might result in a loss in business.</p> <p>However, the company receives a score of '1' because there is no evidence that it assures itself of its employees' confidence in this statement through anonymised surveys or other clearly stated means.</p>
Evidence
<p>[1] Anti-Corruption Policy (Document) Accessed 18/11/2019 https://h20195.www2.hpe.com/v2/GetDocument.aspx?docname=A00000574ENW [p.3] Guiding Principles</p> <p>At Hewlett Packard Enterprise (HPE), our integrity is non-negotiable—we do not tolerate bribery of any kind—and we will not knowingly facilitate any other party's corrupt conduct. We will never trade our integrity for a business opportunity.</p> <p>[29] SBC - We Work With Third Parties Responsibly – Bribery And Corruption (Webpage) Accessed 22/11/2019 https://sbc.hpe.com/en/we-work-with-third-parties-responsibly We don't allow third parties to bribe on our behalf. And we don't want to associate ourselves with anyone who bribes for any purpose. This is true even if it means losing business in the short term.</p> <p>You may never use a third party to do something that you yourself are prohibited from doing.</p>

Question
3.6. Does the company have a clear policy of non-retaliation against whistleblowers and employees who report bribery and corruption incidents?
Score
1
Comments
<p>Based on publicly available information, there is evidence the company promotes a policy of non-retaliation against both whistleblowers and employees who report bribery and corruption incidents. There is evidence that this policy applies to all employees across the organisation, including business partners.</p> <p>However, the company receives a score of '1' because there is no evidence that it assures itself of its employees' confidence in this commitment through surveys, usage data, or other clearly stated means.</p>
Evidence
<p>[1] Anti-Corruption Policy (Document) Accessed 18/11/2019 https://h20195.www2.hpe.com/v2/GetDocument.aspx?docname=A00000574ENW [p.12] Any person who, in good faith, reports suspected legal, ethical or policy violations will not suffer any adverse consequences for having done so. Retaliation in any form against an individual who in good faith reports a suspected violation of this Policy, or who assists in the investigation of a reported violation, is prohibited.</p> <p>[39] Living Progress Report 2018 (Document) Accessed 25/11/2019 https://assets.ext.hpe.com/is/content/hpedam/documents/a00069000-9999/a00069386/a00069386enw.pdf [p.56] If something is not right, we want to know. We encourage anyone with a concern or question about business conduct to raise it via one of our reporting channels, without fear of reprisal.</p> <p>[22] SBC - We Win The Right Way (Webpage) Accessed 22/11/2019 https://sbc.hpe.com/en/we-win-the-right-way At HPE, we aspire to ethical leadership. We want to win the right way, every day. How do we live up to that aspiration?</p> <p>We make ethical decisions.</p> <p>We report misconduct, and we never retaliate.</p> <p>[2] Partner Code of Conduct (Document) Accessed 18/11/2019 https://www.hpe.com/us/en/pdfViewer.html?docId=a00042891&parentPage=/us/en/about/governance/policies&resourceTitle=Partner+Code+of+Conduct [p.4] Business Controls</p> <p>HPE Partners must maintain or where necessary establish effective business controls that are capable of preventing and detecting unlawful conduct by their employees and counterparties. By way of guidance,</p> <p>[p.5] an effective business controls program typically contains at least the following components:</p> <p>[...]</p> <p>(viii) clearly communicated mechanisms for employees to report misconduct or seek guidance without fear of retaliation, including on a confidential basis, unless prohibited by law.</p> <p>[15] SBC - Message from the Chief Ethics and Compliance Officer (Webpage) Accessed 20/11/2019 https://sbc.hpe.com/en/message-from-our-chief-ethics-and-compliance-officer Read the Standards of Business Conduct, understand it, and when faced with tough situations, consult it for guidance. When you are unsure, reach out – to my team, to your leaders, or Human Resources – and ask for help.</p>

Finally, if you have concerns about conduct you see or hear about, please raise them through one of our many reporting channels. We take allegations seriously. We hold people accountable when we find misconduct. And we never tolerate retaliation against employees who speak up honestly and in good faith.

[24] SBC - We Win The Right Way – Report Concerns And Do Not Retaliate (Webpage)

Accessed 22/11/2019

<https://sbc.hpe.com/en/we-win-the-right-way>

Every employee has a responsibility to report misconduct promptly.

If you are aware of misconduct, use the Open Door Policy to raise concerns with your manager, HR, your local SBC team, or the Ethics and Compliance Office.

HPE does not tolerate retaliation against anyone who raises a concern honestly and in good faith.

Q: What do we expect from managers?

Managers must demonstrate ethical leadership and cultivate a work environment that promotes integrity, trust, and respect. Managers must provide proper guidance to employees and take appropriate action to prevent, detect, and respond to misconduct. And managers must encourage open and honest communication, and ensure that employees can ask questions or raise concerns without fear of retaliation.

Q: Do I need to report misconduct that was committed by a supplier, partner, or customer?

Yes. If you are aware of misconduct, even if the action was taken by a supplier, partner, or customer, rather than an employee, you still must report it.

[2] Partner Code of Conduct (Document)

Accessed 18/11/2019

<https://www.hpe.com/us/en/pdfViewer.html?docId=a00042891&parentPage=/us/en/about/governance/policies&resourceTitle=Partner+Code+of+Conduct>

[p.4] Business Controls

HPE Partners must maintain or where necessary establish effective business controls that are capable of preventing and detecting unlawful conduct by their employees and counterparties. By way of guidance,

[p.5] an effective business controls program typically contains at least the following components:

[...]

(viii) clearly communicated mechanisms for employees to report misconduct or seek guidance without fear of retaliation, including on a confidential basis, unless prohibited by law.

[...]

HPE Partners should contact HPE if they have any questions about this Partner Code of Conduct. HPE Partners also must report to HPE any conduct of their employees and representatives, as well as any conduct of HPE's employees and representatives, that is believed in good faith to be an actual, apparent, or potential violation of this Partner Code of Conduct, HPE's Standards of Business Conduct, or applicable laws relating to the sale or distribution of HPE products. Reports will be handled as confidentially as possible.

Reports should be made to the Partners' designated HPE representative or to the HPE Ethics and Compliance Office:

- By email: corporate.compliance.hpe@hpe.com
- By phone: Partners in the following countries can reach The Guideline by dialing the applicable number below:

United States/Canada/Puerto Rico 855-409-0075

China 4008811554 Malaysia 1-800-81-8048

Singapore 800-110-2183

United Kingdom 0808-234-6187

Partners in all other countries should use the International Dialing Guide to locate your AT&T Direct® Access Number - select the country you are calling from and select the United States as the country you are calling. Dial the Direct® Access Number provided. When prompted, dial 855-409-0075.

- By mail: Hewlett Packard Enterprise Attention: Ethics and Compliance Office 11445 Compaq Center Dr. West Houston, TX 77070 United States
- If preferred, you may submit your report directly to the HPE Board of Directors via email at BOD-HPE@hpe.com.

Question
3.7. Does the company provide multiple whistleblowing and advice channels for use by all (e.g. employees and external parties), and do they allow for confidential and, wherever possible, anonymous reporting?
Score
2
Comments
<p>Based on publicly available information, there is evidence that the company has multiple channels to report instances of suspected corrupt activity and seek advice on its anti-bribery and corruption programme. The company indicates that channels are sufficiently varied to allow employees to raise concerns across the management chain, as well as through an external channel operated by an independent third party. These channels allow for confidential and, wherever possible, anonymous reporting.</p> <p>In addition, there is evidence that these are available and accessible to all employees in all jurisdictions where the company operates, including those employed by the group as third parties, and in all relevant languages.</p>
Evidence
<p>[45] Ethics Point Whistleblowing Website (Webpage) Accessed 18/06/2020 https://secure.ethicspoint.com/domain/media/en/gui/44841/index.html ATTENTION! This webpage is hosted on EthicsPoint's secure servers and is not part of the Hewlett Packard Enterprise website or intranet.</p> <p>Our Commitment</p> <p>Hewlett Packard Enterprise is committed to an environment of open, honest communication. We want you to feel comfortable approaching us when you have a concern about a potential violation of HPE policy or the HPE Standards of Business Conduct. We encourage you to use the toll-free numbers or web form, hosted by a third-party provider, EthicsPoint, to submit a confidential, anonymous report.</p> <p>Please provide as much information as possible, including the name of your organization, the name(s) of people potentially involved, details of the concern, supporting evidence, and any other relevant information. It is important to provide sufficient detail, especially if you are submitting an anonymous report. You will be contacted within two business days with confirmation of your submittal or to request additional information, if you have provided your contact information.</p> <p>Please note: Some countries may have restrictions on which types of issues are available for reporting through this site. However, reporting is still available by emailing the HPE Ethics Office directly at corporate.compliance.hpe@hpe.com</p> <p>See the EthicsPoint FAQs and EthicsPoint Privacy Notice for more information.</p> <p>[15] SBC - Message from the Chief Ethics and Compliance Officer (Webpage) Accessed 20/11/2019 https://sbc.hpe.com/en/message-from-our-chief-ethics-and-compliance-officer Our Standards of Business Conduct provides guidance for HPE employees across the globe: we are all bound by its rules, and we are all responsible for upholding its values. Read the Standards of Business Conduct, understand it, and when faced with tough situations, consult it for guidance. When you are unsure, reach out – to my team, to your leaders, or Human Resources – and ask for help.</p> <p>Finally, if you have concerns about conduct you see or hear about, please raise them through one of our many reporting channels. We take allegations seriously. We hold people accountable when we find misconduct. And we never tolerate retaliation against employees who speak up honestly and in good faith.</p> <p>Thank you for helping HPE win the right way.</p> <p>Glenn Leon</p> <p>[23] SBC - We Win The Right Way – Your Obligations (Webpage)</p>

Accessed 22/11/2019

<https://sbc.hpe.com/en/we-win-the-right-way>

Corporate.compliance.hpe@hpe.com

Ethics Hotline - phone or web

Anonymous reporting possible wherever local law allows

Translation services available

Operators available 24/7

Hewlett Packard Enterprise

Attention: Ethics and Compliance Office

11445 Compaq Center Dr.

West Houston, TX 77070, USA

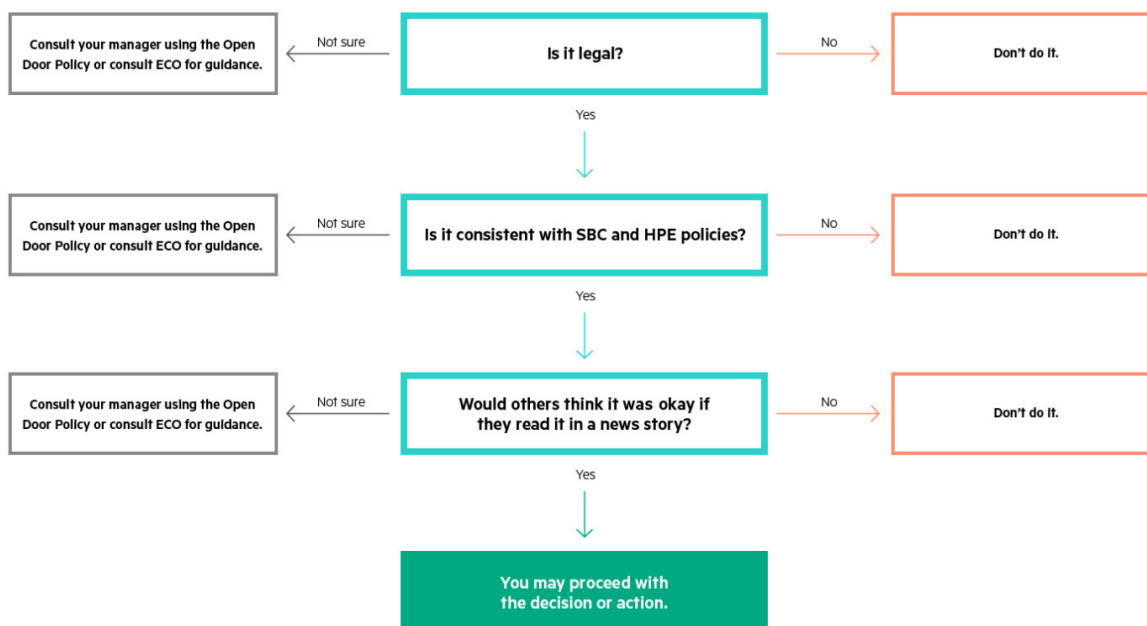
As an HPE employee, you must conduct yourself with integrity and make ethical decisions.

As part of this obligation, you must abide by the SBC, HPE policies, and the law.

Often, reaching the right decision will be obvious. But occasionally, you will encounter circumstances where the right decision will not be immediately clear.

In these circumstances, we encourage you to consult the SBC for guidance. Take the headline test below to assess the soundness and potential consequences of your decisions. And reach out to your HPE colleagues for help: your manager, your peers, your local SBC team, or the Ethics and Compliance Office will be glad to engage to ensure we win the right way

Unsure about a decision or action? Use the Headline Test.



[24] SBC - We Win The Right Way – Report Concerns And Do Not Retaliate (Webpage)

Accessed 22/11/2019

<https://sbc.hpe.com/en/we-win-the-right-way>

Every employee has a responsibility to report misconduct promptly.

If you are aware of misconduct, use the Open Door Policy to raise concerns with your manager, HR, your local SBC team, or the Ethics and Compliance Office.

HPE does not tolerate retaliation against anyone who raises a concern honestly and in good faith.

Q: What do we expect from managers?

Managers must demonstrate ethical leadership and cultivate a work environment that promotes integrity, trust, and respect. Managers must provide proper guidance to employees and take appropriate action to prevent, detect, and respond to misconduct. And managers must encourage open and honest communication, and ensure that employees can ask questions or raise concerns without fear of retaliation.

Q: Do I need to report misconduct that was committed by a supplier, partner, or customer?

Yes. If you are aware of misconduct, even if the action was taken by a supplier, partner, or customer, rather than an employee, you still must report it.

[7] Report an Ethics Concern (Webpage)

Accessed 18/11/2019

<https://www.hpe.com/us/en/about/governance/report-ethics-concerns.html>

We encourage anyone with a concern to speak up and report things that don't seem right.

We provide multiple channels, making it easy to ask questions or report a concern. Use any of the options listed on this page when you have questions or concerns about a potential violation of law, company policy, or HPE's Standards of Business Conduct.

Reports are kept confidential and can even be submitted anonymously. We take each and every report seriously; we review every concern raised, respond promptly and investigate alleged violations as appropriate.

For assistance or to report a concern:

Email:

corporate.compliance.hpe@hpe.com

Phone:

Call the GuideLine from anywhere in the world 24 hours a day. Translators are available and callers can remain anonymous, except where anonymous reporting is prohibited by local law.

- United States/Canada/Puerto Rico (855-409-0075)
- China (4008811554)
- Malaysia (1-800-81-8048)
- Singapore (800-110-2183)
- United Kingdom (0808-234-6187)

Employees in all other countries should use the International Dialing Guide to locate your AT&T Direct® Access Number. Select the country you are calling from and select the United States as the country you are calling. Dial the Direct® Access Number provided. When prompted, dial 855-409-0075.

Mail:

Hewlett Packard Enterprise

Attn: Ethics and Compliance Office

11445 Compaq Center Dr. West

Houston, TX 77070

[1] Anti-Corruption Policy (Document)

Accessed 18/11/2019

<https://h20195.www2.hpe.com/v2/GetDocument.aspx?docname=A00000574ENW>

[p.3] Guiding Principles

[...]

Violations of this Policy may lead to disciplinary action up to and including termination of employment with HPE.

Any employee with knowledge or suspicion of any violations of this Policy must report these concerns to the Ethics & Compliance Office.

[p.12] Reporting of Violations or Concerns and Non-Retaliation Policy

Reporting violations is an obligation of all employees under our Standards of Business Conduct. Please report any suspected violations of HPE's Anti-Corruption Policy to your manager, the next level of management, Human Resources, or the Ethics & Compliance Office at corporate.compliance.hpe@hpe.com. You also may call HPE's

24-hour confidential ethics hotline. Employees in the following countries can reach the ethics hotline by dialing the applicable number below:

United States/Canada/Puerto Rico 855-409-0075
 China 4008811554
 Malaysia 1-800-81-8048
 Singapore 800-110-2183
 United Kingdom 0808-234-6187

Employees in all other countries should use the International Dialing Guide to locate your AT&T Direct Access Number. Select the country you are calling from and select the United States as the country you are calling. Dial the Direct Access Number provided. When prompted, dial 855-409-0075.

Any person who, in good faith, reports suspected legal, ethical or policy violations will not suffer any adverse consequences for having done so. Retaliation in any form against an individual who in good faith reports a suspected violation of this Policy, or who assists in the investigation of a reported violation, is prohibited.

Organization - Office of Legal and Administrative Affairs
 Sponsor - Glenn Leon, Senior Vice President and Chief Ethics & Compliance Officer
 Contact - Matt Cohen, Director and Managing Counsel, Anti-Corruption
 Phone +1 757 448 2840
 Email - mcohen@hpe.com

[39] Living Progress Report 2018 (Document)
Accessed 25/11/2019

<https://assets.ext.hpe.com/is/content/hpedam/documents/a00069000-9999/a00069386/a00069386enw.pdf>

[p.56] If something is not right, we want to know. We encourage anyone with a concern or question about business conduct to raise it via one of our reporting channels, without fear of reprisal. Reports are confidential and can be made anonymously where local law allows.

[2] Partner Code of Conduct (Document)
Accessed 18/11/2019

<https://www.hpe.com/us/en/pdfViewer.html?docId=a00042891&parentPage=/us/en/about/governance/policies&resourceTitle=Partner+Code+of+Conduct>

[p.1] Further, HPE requires that HPE Partners

[...]

(4) to the extent they become aware, proactively report to HPE actual or potential violations of this Partner Code of Conduct or applicable laws involving HPE products by their employees and representatives, as well as actual or potential violations of HPE's Standards of Business Conduct, this Partner Code of Conduct, and applicable laws by HPE's employees and representatives;

[p.2] Any requests by an HPE employee to engage in unethical conduct should be reported to HPE through one of the methods specified at the end of this Code of Conduct.

[p.5] HPE Partners should contact HPE if they have any questions about this Partner Code of Conduct. HPE Partners also must report to HPE any conduct of their employees and representatives, as well as any conduct of HPE's employees and representatives, that is believed in good faith to be an actual, apparent, or potential violation of this Partner Code of Conduct, HPE's Standards of Business Conduct, or applicable laws relating to the sale or distribution of HPE products.

Reports will be handled as confidentially as possible. Reports should be made to the Partners' designated HPE representative or to the HPE Ethics and Compliance Office:

- By email: corporate.compliance.hpe@hpe.com
- By phone: Partners in the following countries can reach The Guideline by dialing the applicable number below:

[2] Partner Code of Conduct (Document)
Accessed 18/11/2019

<https://www.hpe.com/us/en/pdfViewer.html?docId=a00042891&parentPage=/us/en/about/governance/policies&resourceTitle=Partner+Code+of+Conduct>

[p.4] Business Controls

HPE Partners must maintain or where necessary establish effective business controls that are capable of preventing and detecting unlawful conduct by their employees and counterparties. By way of guidance,

[p.5] an effective business controls program typically contains at least the following components:

[...]

(viii) clearly communicated mechanisms for employees to report misconduct or seek guidance without fear of retaliation, including on a confidential basis, unless prohibited by law.

[...]

HPE Partners should contact HPE if they have any questions about this Partner Code of Conduct. HPE Partners also must report to HPE any conduct of their employees and representatives, as well as any conduct of HPE's employees and representatives, that is believed in good faith to be an actual, apparent, or potential violation of this Partner Code of Conduct, HPE's Standards of Business Conduct, or applicable laws relating to the sale or distribution of HPE products. Reports will be handled as confidentially as possible.

Reports should be made to the Partners' designated HPE representative or to the HPE Ethics and Compliance Office:

- By email: corporate.compliance.hpe@hpe.com

- By phone: Partners in the following countries can reach The Guideline by dialing the applicable number below:

United States/Canada/Puerto Rico 855-409-0075

China 4008811554 Malaysia 1-800-81-8048

Singapore 800-110-2183

United Kingdom 0808-234-6187

Partners in all other countries should use the International Dialing Guide to locate your AT&T Direct® Access Number - select the country you are calling from and select the United States as the country you are calling. Dial the Direct® Access Number provided. When prompted, dial 855-409-0075.

- By mail: Hewlett Packard Enterprise Attention: Ethics and Compliance Office 11445 Compaq Center Dr. West Houston, TX 77070 United States

- If preferred, you may submit your report directly to the HPE Board of Directors via email at BOD-HPE@hpe.com.

[36] Corporate Ethics (Webpage)

Accessed 25/11/2019

<https://www.hpe.com/us/en/about/governance/ethics.html>

We respond swiftly to violations and have systems in place for reporting and resolving ethical concerns, in line with our policies and local laws.

[44] Updated Corporate Ethics Page (Webpage)

Accessed 18/06/2020

<https://www.hpe.com/us/en/about/governance/ethics.html#Anticorruption>

HPE provides anti-corruption training to all employees annually as part of its Standards of Business Conduct training. We provide this training in twenty different languages: English, French, Italian, German, Spanish, Japanese, Chinese (simplified), Chinese (traditional), Korean, Vietnamese, Portuguese, Dutch, Bulgarian, Czech, Hungarian, Arabic, Russian, Hebrew, Indonesian, and Polish.

[19] US Public Sector Code of Conduct (Document)

Accessed 20/11/2019

<https://h20195.www2.hpe.com/V2/GetPDF.aspx/c04909622.pdf>

To report a concern

Questionable situations must be reported immediately to the Ethics & Compliance Office or the U.S. Public Sector Compliance Office. If you wish to maintain confidentiality, you may write to Hewlett-Packard Enterprise, Ethics and Compliance Office, 11445 Compaq Center Dr. West, Houston, TX, 77070 or call The GuideLine at 855-409-0075.

Violations of this policy are grounds for disciplinary action, up to and including dismissal. Disciplinary action will be taken against those who authorize or participate in violations of this Code of Conduct, or those who deliberately fail to report violations or withhold relevant information concerning a violation.

Questions concerning this Code of Conduct should be directed to the U.S. Public Sector Compliance Office.

4. Conflict of Interest

Question
4.1. Does the company have a policy defining conflicts of interest – actual, potential and perceived – that applies to all employees and board members?
Score
2
Comments
<p>Based on publicly available information, there is evidence that the company has policies that define conflicts of interest, including actual, potential and perceived conflicts. The company's policy clearly apply to all employees and board members and address possible conflicts arising from government relationships, outside employment, financial interests and employee relationships.</p>
Evidence
<p>[5] 2019 Proxy Statement (Document) Accessed 18/11/2019 https://investors.hpe.com/financial/proxy-2019/interactive/proxy/images/HPE-Proxy2019.pdf [p.27] Governance documents</p> <p>We maintain a code of business conduct and ethics for directors, officers and employees known as our Standards of Business Conduct.</p> <p>[16] SBC – We Avoid Conflicts of Interest – Outside Employment (Webpage) Accessed 20/11/2019 https://sbc.hpe.com/en/we-avoid-conflicts-of-interest</p> <p>A conflict of interest can exist in any situation where loyalties may be divided between our company's interests and our own, or between HPE's interests and those of anyone outside HPE. Be sure to make decisions in the best interests of HPE.</p> <p>Most conflicts of interest can be avoided by following the rules in HPE's Conflicts of Interest Policy. We are all responsible for using good judgment to evaluate activities that may result in a conflict of interest, along with asking questions and sharing with managers any concerns about potential conflicts.</p> <p>You may not engage in outside employment activities if doing so will negatively impact the work you do at HPE.</p> <p>Some activities are never permitted: for example, you may never work for an HPE competitor.</p> <p>Other activities – like outside opportunities with our partners, suppliers, or customers – may be permissible in some instances, but only with proper approval.</p> <p>Bear in mind that even the appearance of a conflict can be problematic. Consider whether your outside activities would lead others to question your judgement, decisions, or actions in your role at HPE. And consult the policy to make sure you follow the rules.</p> <p>Q: What is an outside employment activity?</p> <p>Outside employment means any position you hold – whether as an employee, consultant, contractor, or owner – in addition to your job at HPE.</p> <p>Examples include:</p> <ul style="list-style-type: none"> • Part-time job at a local coffee shop • Service on the advisory board of an HPE customer • Consulting services provided to a friend's business <p>Q: Does the policy apply to volunteer activities and/or board service?</p>

Yes. Our policy addresses these kinds of outside activities too. Check out the specific rules here.

[18] SBC – We Avoid Conflicts of Interest – Financial Interests (Webpage)

Accessed 20/11/2019

<https://sbc.hpe.com/en/we-avoid-conflicts-of-interest>

You may never hold personal or family financial interest in an HPE customer, reseller, supplier, partner, or competitor if those financial interests would improperly influence your judgment and actions at HPE. Indeed, these interests are forbidden even if they create an appearance of improper influence.

Financial interests include investment, ownership, creditor interests, or any other financial arrangement that provides a share of profits or revenues. This includes founder's stock in any company with which you deal on HPE's behalf.

Consult the policy for more on financial interests in other businesses.

Related Content:

COI Frequently Asked Questions

[20] SBC – We Avoid Conflicts of Interest – Personal Relationships (Webpage)

Accessed 22/11/2019

<https://sbc.hpe.com/en/we-avoid-conflicts-of-interest>

If you and a family member – or other individual with whom you have a romantic or other close personal relationship – are employed at HPE, you may not:

- Report to one another, either directly or indirectly; or
- Be involved in the other's employment-related decisions, such as hiring, performance reviews, or recommendations for promotions.

If you have personal relationships with individuals who work for an HPE business partner or competitor, or who serve as a government official involved with HPE business, you should consult our policy to ensure you follow the rules. Note that even the appearance of an improper relationship may create a conflict for HPE.

Q: What do I do if a conflict of interest arises?

If you find yourself in one of the above situations due to organizational changes or other circumstances, you must promptly disclose in writing the situation to your manager and director.

Consult the policy for more on potential conflicts of interest that may arise from your personal relationships.

[21] SBC – We Avoid Conflicts of Interest – Use of HPE Resources (Webpage)

Accessed 22/11/2019

<https://sbc.hpe.com/en/we-avoid-conflicts-of-interest>

HPE provides computers, email and phone systems, and other resources for employees to conduct HPE business. Personal use must be infrequent and kept to a minimum. And you may not use HPE resources to conduct outside employment or volunteer activities.

Consult the policy for more on the use of HPE resources.

[19] US Public Sector Code of Conduct (Document)

Accessed 20/11/2019

<https://h20195.www2.hpe.com/V2/GetPDF.aspx/c04909622.pdf>

Organizational conflicts of interest

In addition to avoiding personal conflicts of interest with the company's business, you must comply with the rules governing organizational conflicts of interest (OCI) applicable to government contractors and subcontractors. Under these rules, HPE may be disqualified from certain present or future business opportunities if HPE would obtain an unfair competitive advantage over other offerors, be in a position to unfairly bias government action in HPE's favor, or be unable to render objectively impartial advice.

For example, HPE may be precluded from bidding on future work for that agency if HPE had access to other potential offerors' proprietary information, had prepared the specifications governing the future procurement, was placed in a position to evaluate HPE's own performance, or could not render impartial advice. You should become

familiar with applicable OCI rules and if you have questions, consult with Contracts, Legal, or the U.S. Public Sector Compliance Office.

See: Conflicts of Interest and Organizational Conflicts of Interest

[28] SBC - We Work With Third Parties Responsibly – Conflicts of Interest (Webpage)

Accessed 22/11/2019

<https://sbc.hpe.com/en/we-work-with-third-parties-responsibly>

HPE engages third parties based on the merits of their services and business practices, not based on family connections, personal financial interests, or other inappropriate considerations. You should be mindful of any potential conflicts of interest, including those that might arise between our third party partners and our customers.

How might a conflict arise?

For example, if a government official requires HPE to use a specific third party, the official may have an improper arrangement with the third party. If you discover a conflict of interest like this (or any other) in your dealings with a third party, you must address it. For more information, consult the Conflicts of Interest Section, or read our Conflicts of Interest Policy.

[1] Anti-Corruption Policy (Document)

Accessed 18/11/2019

<https://h20195.www2.hpe.com/v2/GetDocument.aspx?docname=A00000574ENW>

[p.9] Third parties must not have a conflict of interest in connection with the particular transaction(s) for which they are engaged.

For example, they may not receive payment from HPE if they are also the customer's consultant, paid adviser, or supplier relating to the transaction with HPE, or if they are an employee, officer, director, proxy-holder, affiliate or shareholder of any other party to the transaction. Similarly, the third party may not receive payment from HPE if they are also a family member of any party in the transaction unless: the third party discloses the potential conflict of interest to HPE; the third party's family member is not involved in and does not benefit from the transaction; and your manager approves the arrangement in writing.

[p.10] Third parties associated with government officials require approvals.

You must obtain written approval from the Ethics & Compliance Office before entering into any arrangement with a third party if a government official has or may have an interest, directly or indirectly, in the business opportunity

[2] Partner Code of Conduct (Document)

Accessed 18/11/2019

<https://www.hpe.com/us/en/pdfViewer.html?docId=a00042891&parentPage=/us/en/about/governance/policies&resourceTitle=Partner+Code+of+Conduct>

[p.4] Conflicts of Interest

HPE Partners must avoid engaging in any business activity that could create a conflict between their interests as an HPE Partner and HPE Partner's separate duty or obligation to provide independent advice to a Customer regarding the products or services being procured.

In order to avoid actual, potential or apparent conflict of interest situations, HPE Partners are not authorized to operate as an agent partner or to collect an agent commission or fee, or other type of compensation from HPE, where the HPE Partner is under a separate duty or obligation to provide independent, unbiased advice to a Customer regarding the products or services being procured.

If a Partner believes that there exists a conflict of interest, or that a potential conflict of interest may arise, the Partner should report all pertinent details to a designated HPE representative. HPE employees are required to comply with HPE's Standards of Business Conduct. The selection of HPE Partners is based on the quality of their services and their business integrity.

HPE holds its employees to high ethical standards and requires them to avoid engaging in any activity that involves even the appearance of impropriety or conflict of interest. HPE Partners must not ask or encourage HPE employees to violate the provisions of HPE's Standards of Business Conduct.

Question
4.2. Are there procedures in place to identify, declare and manage conflicts of interest, which are overseen by a body or individual ultimately accountable for the appropriate management and handling of conflict of interest cases?
Score
1
Comments
<p>Based on publicly available information, there is some evidence the company has procedures to manage conflicts of interest, including actual, potential and perceived conflicts. The company states that employees are required to disclose potential conflicts to their manager, while directors must report potential conflicts to the Chairman of the board.</p> <p>However, there is no evidence that all employee and board member declarations are held in a dedicated central register that is accessible to those responsible for oversight of the process. There is no evidence that a specific body or individual has overarching oversight and accountability for handling cases, nor that its policy provides examples of criteria for recusals or indicate that disciplinary measures will apply if breached.</p>
Evidence
<p>[11] Corporate Governance Guidelines (Document) Accessed 18/11/2019 https://investors.hpe.com/~media/Files/H/HP-Enterprise-IR/documents/governance/hpe-corporate-governance-guidelines-updated-jan-2016.pdf [p.4] XI. Standards of Business Conduct</p> <p>[...]</p> <p>Directors are expected to report any possible conflict of interest between the director and Hewlett Packard Enterprise or any violation of the Standards of Business Conduct to the Chairman, or Chairman of the NGSRC Committee, who will review the matter and take appropriate action.</p> <p>[1] Anti-Corruption Policy (Document) Accessed 18/11/2019 https://h20195.www2.hpe.com/v2/GetDocument.aspx?docname=A00000574ENW [p.9] Third parties must not have a conflict of interest in connection with the particular transaction(s) for which they are engaged. For example, they may not receive payment from HPE if they are also the customer's consultant, paid adviser, or supplier relating to the transaction with HPE, or if they are an employee, officer, director, proxy-holder, affiliate or shareholder of any other party to the transaction. Similarly, the third party may not receive payment from HPE if they are also a family member of any party in the transaction unless: the third party discloses the potential conflict of interest to HPE; the third party's family member is not involved in and does not benefit from the transaction; and your manager approves the arrangement in writing.</p> <p>[p.10] Third parties associated with government officials require approvals.</p> <p>You must obtain written approval from the Ethics & Compliance Office before entering into any arrangement with a third party if a government official has or may have an interest, directly or indirectly, in the business opportunity.</p> <p>[2] Partner Code of Conduct (Document) Accessed 18/11/2019 https://www.hpe.com/us/en/pdfViewer.html?docId=a00042891&parentPage=/us/en/about/governance/policies&resourceTitle=Partner+Code+of+Conduct [p.4] Conflicts of Interest</p> <p>HPE Partners must avoid engaging in any business activity that could create a conflict between their interests as an HPE Partner and HPE Partner's separate duty or obligation to provide independent advice to a Customer regarding the products or services being procured. In order to avoid actual, potential or apparent conflict of interest situations, HPE Partners are not authorized to operate as an agent partner or to collect an agent commission or fee, or other type of compensation from HPE, where the HPE Partner is under a separate duty or obligation to provide independent, unbiased advice to a Customer regarding the products or services being procured. If a Partner</p>

believes that there exists a conflict of interest, or that a potential conflict of interest may arise, the Partner should report all pertinent details to a designated HPE representative.

[20] SBC – We Avoid Conflicts of Interest – Personal Relationships (Webpage)

Accessed 22/11/2019

<https://sbc.hpe.com/en/we-avoid-conflicts-of-interest>

Q: What do I do if a conflict of interest arises?

If you find yourself in one of the above situations due to organizational changes or other circumstances, you must promptly disclose in writing the situation to your manager and director.

[16] SBC – We Avoid Conflicts of Interest – Outside Employment (Webpage)

Accessed 20/11/2019

<https://sbc.hpe.com/en/we-avoid-conflicts-of-interest>

Most conflicts of interest can be avoided by following the rules in HPE's Conflicts of Interest Policy. We are all responsible for using good judgment to evaluate activities that may result in a conflict of interest, along with asking questions and sharing with managers any concerns about potential conflicts.

You may not engage in outside employment activities if doing so will negatively impact the work you do at HPE.

[...]

Other activities – like outside opportunities with our partners, suppliers, or customers – may be permissible in some instances, but only with proper approval.

Question
4.3. Does the company have a policy and procedure regulating the appointment of directors, employees or consultants from the public sector?
Score
1
Comments
<p>Based on publicly available information, there is evidence the company has a policy that addresses the risks associated with the employment of public officials. The company's policy stipulates that the compliance officer must give prior approval for the initiation of any employment discussions with former or current public officials.</p> <p>However, the company receives a score of '1' because there is no clear evidence that its recruitment process for current or former public officials includes a review of actual, potential or perceived conflicts of interest, or that restrictions may be placed on their activities if such conflicts of interest are identified. There is also no evidence that the company has a policy to implement a cooling-off period of at least 12 months before public officials are permitted to have any form of contact or relationship with their former organisation on the company's behalf. It is noted that the company has a separate policy which may contain more information on its approach, but this document does not appear to be publicly accessible.</p>
Evidence
<p>[19] US Public Sector Code of Conduct (Document) Accessed 20/11/2019 https://h20195.www2.hpe.com/V2/GetPDF.aspx/c04909622.pdf Hiring government employees</p> <p>Due to the wide range of laws and regulations that govern the hiring of former government employees, you may not enter into employment discussions with current or former government employees meeting the criteria of a Covered Government Official until they have been prescreened by the U.S. Public Sector Compliance Office.</p> <p>Prospective applicants who have worked for the federal or state/local government in the last five years and who meet the criteria of a Covered Government Official must complete a special employment questionnaire and receive counsel from the U.S. Public Sector Compliance Office prior to any employment discussions. Additionally, under no circumstances may you have employment discussions with government officials involved in a pending procurement in which HPE is participating.</p> <p>See: Hiring Current and Former Government Employees.</p> <p>[1] Anti-Corruption Policy (Document) Accessed 18/11/2019 https://h20195.www2.hpe.com/v2/GetDocument.aspx?docname=A00000574ENW [p.8] Employment Decisions</p> <p>HPE employment decisions must be based on objective measures and legitimate company needs. HPE may not provide a job or internship to a family member of a public sector official, or anyone suggested by a public sector official, in order to gain influence with the government official or secure any other improper advantage.</p>

Question
4.4. Does the company report details of the contracted services of serving politicians to the company?
Score
0
Comments
There is no evidence that the company publishes details of any contracted services of serving politicians.
Evidence
No evidence found.

5. Customer Engagement

5.1 Contributions, Donations and Sponsorships

Question
5.1.1. Does the company have a clearly defined policy and/or procedure covering political contributions?
Score
0
Comments
<p>Based on publicly available information, there is evidence that the company has a policy on corporate political contributions. The company indicates that political contributions are permissible in limited circumstances and when approved by the Vice President of HPE Corporate Affairs and reviewed by the board. The company states that it does not make any political donations where there is a risk of creating the appearance of undue influence. In addition, there is evidence that the company is associated with a Political Action Committee (PAC) in the United States.</p> <p>Since the company does not prohibit political donations and is associated with a PAC, it receives a score of '0' in line with the scoring criteria.</p>
Evidence
<p>[13] Political Contributions Policy (Document) Accessed 18/11/2019 https://h20195.www2.hpe.com/V2/GetDocument.aspx?docname=A00001848ENW</p> <p>[p.2] Hewlett Packard Enterprise always has been active in the formation of public policies that affect the company, its employees, and its operations. As Hewlett Packard Enterprise looks to the future, it will continue to work with key public officials to promote HPE as a thought, technology, and issue leader, to promote HPE as an exemplary global citizen, and to promote the HPE brand. Throughout its history, Hewlett Packard Enterprise has encouraged employees to be active in their communities. Because the development of public policy and related political activity can be complicated—particularly during active campaign periods—the company limits political activities on company time and premises.</p> <p>Within the U.S., the company makes a limited number of political contributions as part of its Global Citizenship Objective and in furtherance of its public policy agenda. All Hewlett Packard Enterprise political endorsements and contributions must be authorized by the Senior Vice President of HPE Corporate Affairs as part of political programs reviewed by HPE's Board of Directors. The HPE Corporate Affairs department manages all political programs and contributions and works with HPE employees in the regions regarding HPE involvement in any political or public policy activities. Hewlett Packard Enterprise does not provide political contributions that could create even the appearance of undue influence.</p> <p>HPE PAC and corporate contributions</p> <p>Hewlett Packard Enterprise may not use its corporate funds or assets for U.S. federal political contributions. The Hewlett Packard Enterprise Political Action Committee (HPE PAC) makes contributions to U.S. congressional candidates (and in limited cases, contributions to state candidates where corporate contributions are not allowed) who share HPE's public policy views. The HPE PAC is a separate legal entity from the company.</p> <p>Voluntary personal contributions to fund the HPE PAC are solicited from selected employees in compliance with federal election laws. Company funds may be used, where legally permissible, to participate in the election of state officials who share Hewlett Packard Enterprise's public policy views, as well as passage or defeat of state and local ballot measures having an impact on the company and the quality of life in HPE communities. In rare instances, HPE will consider contributions to local candidates. HPE does not make independent political expenditures. Occasionally, HPE will support ballot initiatives, and includes these contributions in its public disclosures. Hewlett Packard Enterprise makes contributions to federal and state organizations for the purpose of public policy development. A committee of HPE managers annually reviews eligible recipients of funds for both the HPE PAC</p>

contributions and corporate contributions and develops an HPE PAC contributions plan and a corporate contributions plan.

The HPE PAC plan undergoes an initial legal review and is presented to the HPE PAC Board of Directors, which reviews, revises, and approves the plan. Both the final HPE PAC plan and the corporate contributions plan are then presented to Hewlett Packard Enterprise's Senior Vice President of Corporate Affairs, Hewlett Packard Enterprise's Chief Communications Officer, and the Nominating and Governance Committee of the Hewlett Packard Enterprise Board. Upon approval of the plans, the HPE Political Contributions Committee, comprised of HPE Corporate Affairs managers, implements the plans by reviewing all specific political contributions requests and events requiring corporate and HPE PAC funding. After final legal review of each such contribution, funds are disbursed. On a limited basis and with the approval of the Senior Vice President of HPE Corporate Affairs, the company may also make contributions to policy-based partisan organizations, state partisan organizations, trade association political committees and coalitions to further its public policy and business interests.

Generally, HPE does not contribute to 501(c)(4) organizations for political purposes, nor does it allow trade association dues to be used for political contributions. In-kind contributions of equipment or employee time are considered to be political contributions, and must be approved by the Senior Vice President of HPE Corporate Affairs. No HPE funds or assets may be used for political contributions outside the United States, even where permitted by local law, without the prior written approval of HPE's Chief Executive Officer.

[p.3] Criteria for assessing candidates

HPE Corporate Affairs uses the following candidate assessment factors as guidelines when developing candidate recommendations at both the state/local and federal levels:

Primary considerations

- Bi-partisan activity
- Support/leadership (key committees) on HPE business priorities
- HPE site relationship
- Strong or emerging relationship with HPE and/or high-tech industry

Additional considerations

- Moderate candidates favored over partisan extremes
- Ethics/statesmanship
- Promising non-incumbents and diverse candidates Extent of support
- Ability to make a difference in the outcome of the race
- Leadership position and/or support on HPE priority issues
- Make a difference in the tech-friendly composition of legislative body

[27] Rules Applying to Political Contributions (Webpage)

Accessed 22/11/2019

<https://sbc.hpe.com/en/we-comply-with-the-rules-that-govern-our-business>

Special rules apply to political contributions

HPE makes U.S. political contributions to state and local candidates as allowed by U.S. law and HPE policies.

The HPE Political Action Committee (PAC) may also provide political contributions to federal political candidates. Neither HPE nor its PAC provides political contributions that could create even the appearance of improper influence.

HPE employees may make personal contributions to U.S. government candidates, but you may not seek reimbursement from HPE or use HPE funds to do so. Nor should your contributions create the impression that you are speaking or acting on behalf of HPE.

If you are a VP or higher, or if you work on U.S. public sector contracts, you may need to seek approval before making personal political contributions. For more information on approvals, please consult the Political Contributions to U.S. State and Local Government Candidates and the Political Participation Policy.

[12] Public Policy Priorities (Webpage)

Accessed 18/11/2019

<https://www.hpe.com/us/en/public-policy.html>

Political Engagement

HPE engagement in the political process is ethical, legal, and transparent. In the U.S., we advance our political objectives through the HPE PAC, which contributes to candidates and committees aligned with our public policy objectives, and through limited corporate contributions where permitted by law.

[1] Anti-Corruption Policy (Document)

Accessed 18/11/2019

<https://h20195.www2.hpe.com/v2/GetDocument.aspx?docname=A00000574ENW>

[p.6] Political Contributions

HPE supports public policy activities worldwide and the election of public officials who understand HPE's business interests and support legislation important to those interests. The use of HPE's influence, funds and other assets as political contributions must comply with global anti-corruption laws, HPE's Political Participation Policy, and the principles and rules in this Policy. HPE must not provide political contributions or engage in any activity that could create the appearance of bribery, undue influence or other corrupt practices.

[32] Criteria for Assessing Candidates (Webpage)

Accessed 25/11/2019

<https://www.hpe.com/us/en/about/government-affairs/engagement-criteria.html>

HEWLETT PACKARD ENTERPRISE CORPORATE AFFAIRS

Hewlett Packard Enterprise Corporate Affairs uses the following candidate assessment factors as guidelines when developing candidate recommendations at both the state/local and federal levels:

Recommendations

Additional considerations:

- Moderate candidates favored over partisan extremes
- Ethics/statesmanship
- Promising non-incumbents and diverse candidates

Primary considerations:

- Bi-partisan activity
- Support/leadership (key committees) on HPE business priorities
- HPE site relationship
- Strong or emerging relationship with HPE and/or high-tech industry

Extent of support

- Ability to make a difference in the outcome of the race
- Leadership position and/or support on HPE priority issues
- Make a difference in the tech-friendly composition of legislative body

[36] Corporate Ethics (Webpage)

Accessed 25/11/2019

<https://www.hpe.com/us/en/about/governance/ethics.html>

All employees must also abide by our Political Contributions Policy.

[39] Living Progress Report 2018 (Document)

Accessed 25/11/2019

<https://assets.ext.hpe.com/is/content/hpedam/documents/a00069000-9999/a00069386/a00069386enw.pdf>

[p. 54] HPE Board of Directors' Nominating, Governance, and Social Responsibility Committee (NGSR):

[...]

- Oversees our Political Action Committee (PAC), government affairs, and public policy engagement

[p.58] POLITICAL CONTRIBUTIONS

As we engage in the political process, we ensure that our actions are ethical, legal, transparent, and align with the HPE Standards of Business Conduct.

HPE makes corporate contributions to U.S. state and local candidates, committees, and ballot measures. We publicly disclose the candidates, groups, and Section 527 organizations that receive corporate contributions from HPE. The company does not make political contributions outside the U.S. The HPE Political Action Committee (PAC), a separate legal entity funded by voluntary employee donations, makes bipartisan contributions to U.S. Congressional and state and local candidates and committees who share our public policy views. We publicly disclose the candidates and groups that receive HPE PAC contributions

Question

5.1.2. Does the company publish details of all political contributions made by the company and its subsidiaries, or a statement that it has made no such contribution?

Score

2

Comments

There is evidence that the company publishes full information of its corporate political contributions, including details of the recipient, amount, country of recipient and the name of the corporate entity that made the contribution. The company also publishes details of the donations made by its Political Action Committee (PAC), including the name of the candidate, state, party, office and amount donated. There is evidence that this data is updated and released on an annual basis.

Evidence**[39] Living Progress Report 2018 (Document)**

Accessed 25/11/2019

<https://assets.ext.hpe.com/is/content/hpedam/documents/a00069000-9999/a00069386/a00069386enw.pdf>

[p.58] POLITICAL CONTRIBUTIONS

[...] HPE makes corporate contributions to U.S. state and local candidates, committees, and ballot measures. We publicly disclose the candidates, groups, and Section 527 organizations that receive corporate contributions from HPE. The company does not make political contributions outside the U.S. The HPE Political Action Committee (PAC), a separate legal entity funded by voluntary employee donations, makes bipartisan contributions to U.S. Congressional and state and local candidates and committees who share our public policy views.

We publicly disclose the candidates and groups that receive HPE PAC contributions

[33] 2017 Corporate Contributions (Document)

Accessed 25/11/2019

<https://h20195.www2.hpe.com/v2/GetDocument.aspx?docname=a00071666enw>

[p.1]

2017 Corporate Contributions

Candidate/Committee	Party	State	Office	District	Amount
California					
Atkins, Toni	DEM	CA	Senate	078	\$ 1,200
Baker, Catherine	REP	CA	House	016	\$ 1,200
Bates, Pat	REP	CA	Senate	036	\$ 1,200
Berman, Marc	DEM	CA	House	024	\$ 2,500
Bigelow, Frank	REP	CA	House	005	\$ 1,200
Burke, Autumn	DEM	CA	House	062	\$ 1,200
Calderon, Ian	DEM	CA	House	057	\$ 1,500
California Democratic Party - Assembly	DEM	CA	Party Committee	000	\$ 15,000
California Democratic Party - Senate	DEM	CA	Party Committee	000	\$ 15,000
California Latino Caucus Leadership PAC	DEM	CA	House	000	\$ 4,000
California Republican Party	REP	CA	Party Committee	000	\$ 36,500
California Trailblazers	REP	CA	Party Caucus	000	\$ 5,000
Californians for Jobs and a Strong Economy	DEM	CA	Party Caucus	000	\$ 10,000
Chau, Ed	DEM	CA	House	049	\$ 1,200
Cooper, Jim	DEM	CA	House	009	\$ 1,200
Fong, Vince	REP	CA	House	034	\$ 1,200
Gallagher, James	REP	CA	House	003	\$ 1,200
Garcia, Christina	DEM	CA	House	058	\$ 1,200
Glazer, Steven	DEM	CA	Senate	007	\$ 1,200
Hill, Jerry	DEM	CA	House	013	\$ 2,000
Irwin, Jacqui	DEM	CA	House	044	\$ 1,200
Kiley, Kevin	REP	CA	House	006	\$ 1,200
Lara, Ricardo	DEM	CA	Senate	033	\$ 1,200
LGBT Caucus Leadership PAC	DEM	CA	Party Caucus	000	\$ 2,000

[List continues over two pages and includes a state-by state breakdown of donations]

[p.2] Total Corporate Contributions \$143,500

[p.3] 2017 HPE PAC Contributions

The following candidates and committees received HPE support.

US Senate Contributions

Candidate/Committee	Party	State	Office	District	Amount
Barletta, Louis	REP	PA	U.S. Senate		\$ 1,000
Blumenthal, Richard	DEM	CT	U.S. Senate		\$ 2,500
Capito, Shelley	REP	WV	U.S. Senate		\$ 1,000
Carper, Thomas	DEM	DE	U.S. Senate		\$ 1,000
Casey, Robert	DEM	PA	U.S. Senate		\$ 2,500
Collins, Susan	REP	ME	U.S. Senate		\$ 1,500
Flake, Jeffrey	REP	AZ	U.S. Senate		\$ 5,000
Hatch, Orrin	REP	UT	U.S. Senate		\$ 2,500
Heinrich, Martin	DEM	NM	U.S. Senate		\$ 1,500
McCaskill, Claire	DEM	MO	U.S. Senate		\$ 2,000
Peters, Gary	DEM	MI	U.S. Senate		\$ 2,500
Shaheen, Jeanne	DEM	NH	U.S. Senate		\$ 2,000
Strange, Luther	REP	AL	U.S. Senate		\$ 7,500
Total U.S. Senate Contributions					\$ 32,500

[The document provides a further breakdown of all the donations made by the company's various affiliated PAC organisations]

[p.4] Total PAC Contributions \$ 196,500

[34] 2016 Corporate Contributions (Document)

Accessed 25/11/2019

<https://h20195.www2.hpe.com/V2/GetDocument.aspx?docname=A00005842ENW>

[p.1]

2016 Corporate Contributions

Candidate/Committee	Party	State	Office	District	Amount
Alabama					
Free Enterprise PAC	N/A	AL	PAC	000	\$ 5,000
Mainstream PAC	N/A	AL	PAC	000	\$ 5,000
					\$ 10,000
California					
Allen, Ben	DEM	CA	Senate	026	\$ 1,000
Atkins, Toni	DEM	CA	Senate	078	\$ 1,500
Baker, Catherine	REP	CA	Assembly	016	\$ 2,500
Bates, Pat	REP	CA	Senate	036	\$ 1,500
Bigelow, Frank	REP	CA	Assembly	005	\$ 1,500
Brough, Bill	REP	CA	Assembly	073	\$ 1,500
Burke, Autumn	DEM	CA	Assembly	062	\$ 1,500
CA Legislative Black Caucus	N/A	CA	Party Caucus	000	\$ 8,000
Calderon, Ian	DEM	CA	Assembly	057	\$ 2,500
California Democratic Party - Assembly	DEM	CA	Assembly	000	\$ 25,000
California Democratic Party - Senate	REP	CA	Senate	000	\$ 25,000
California Republican Party	REP	CA	Party Committee	000	\$ 50,000
California Trailblazers	REP	CA	Party Caucus	000	\$ 5,000
Californians for Jobs and a Strong Econo	DEM	CA	Party Caucus	000	\$ 25,000
Chau, Ed	DEM	CA	Assembly	049	\$ 1,500
Cooley, Ken	DEM	CA	Assembly	008	\$ 1,500
Cooper, Jim	DEM	CA	Assembly	009	\$ 1,150
Countywide Coalition to Fix Our Roads	N/A	CA	Ballot	000	\$ 25,000
Dahle, Brian	REP	CA	Assembly	001	\$ 2,000
Gallagher, James	REP	CA	Assembly	003	\$ 1,500
Garcia, Christina	DEM	CA	Assembly	058	\$ 1,000
Glazer, Steve	DEM	CA	Senate	007	\$ 1,500
Hadley, David	REP	CA	Assembly	066	\$ 2,500
Hertzberg, Bob	DEM	CA	Senate	018	\$ 1,500
Hill, Jerry	DEM	CA	Senate	013	\$ 200
Irwin, Jacqui	DEM	CA	Assembly	044	\$ 1,500
Kim, Young	REP	CA	Assembly	065	\$ 2,500
Lara, Ricardo	DEM	CA	Senate	033	\$ 4,000
LGBT Caucus Leadership Fund	N/A	CA	Party Caucus	000	\$ 5,000
Ling Chang, Ling	REP	CA	Senate	055	\$ 2,500
Low, Evan	DEM	CA	Assembly	028	\$ 2,500
Maienschein, Brian	REP	CA	Assembly	077	\$ 1,500
Mendoza, Tony	DEM	CA	Senate	032	\$ 1,000

[41] 2018 PAC Contributions (Document)

Accessed 26/11/2019

<https://h20195.www2.hpe.com/v2/Getdocument.aspx?docname=A00048175ENW>

[p.1]

2018 HPE PAC Contributions

The following candidates and committees received PAC support.

U.S. Senate Contributions

Candidate/Committee	Party	State	Office	District	Amount
Barrasso, John	REP	WY	U.S. Senate		\$ 10,000
Carper, Thomas	DEM	DE	U.S. Senate		\$ 2,500
Casey, Robert	DEM	PA	U.S. Senate		\$ 4,200
Daines, Steve	REP	MT	U.S. Senate		\$ 2,000
Fischer, Debra	REP	NE	U.S. Senate		\$ 2,500
Heinrich, Martin	DEM	NM	U.S. Senate		\$ 8,500
Heller, Dean	REP	NV	U.S. Senate		\$ 5,000
Kaine, Tim	DEM	VA	U.S. Senate		\$ 2,500
Shaheen, Jeanne	DEM	NH	U.S. Senate		\$ 1,000
Tester, Jon	DEM	MT	U.S. Senate		\$ 2,500
Total U.S. Senate Contributions					\$ 40,700

U.S. House of Representatives Contributions

Candidate/Committee	Party	State	Office	District	Amount
Aguilar, Peter	DEM	CA	U.S. House	031	\$ 3,000
Beyer, Donald	DEM	VA	U.S. House	008	\$ 2,000
Cardenas, Tony	DEM	CA	U.S. House	029	\$ 2,000
Casten, Sean	DEM	IL	U.S. House	006	\$ 2,000
Cheney, Elizabeth	REP	WY	U.S. House	001	\$ 2,500
Comstock, Barbara	REP	VA	U.S. House	010	\$ 5,000
Connolly, Gerald	DEM	VA	U.S. House	011	\$ 2,000
Culberson, John	REP	TX	U.S. House	007	\$ 1,000
Dean, Madeleine	DEM	PA	U.S. House	004	\$ 2,000
DelBene, Suzan	DEM	WA	U.S. House	001	\$ 2,500
Eshoo, Anna	DEM	CA	U.S. House	018	\$ 5,000
Faso, John	REP	NY	U.S. House	019	\$ 1,000
Flores, Bill	REP	TX	U.S. House	017	\$ 2,500

[List continues over 3 pages]

Question
5.1.3. Does the company have a clearly defined policy and/or procedure covering charitable donations and sponsorships, whether made directly or indirectly, and does it publish details of all such donations made by the company and its subsidiaries?
Score
1
Comments
<p>Based on publicly available information, there is evidence that the company has a policy on both charitable donations and sponsorships to ensure that such expenses are not used as vehicles for bribery. The company's policy stipulates procedures for senior sign-off on all donations and sponsorships. In addition, the company provides some information of its charitable donations and philanthropic activities, including the number of charities supported around the world.</p> <p>However, the company receives a score of '1' because there is no publicly available evidence that it publishes full details of its charitable contributions and sponsorships, such as details of the recipient, amount, country of recipient and which corporate entity made the payment.</p>
Evidence
<p>[5] 2019 Proxy Statement (Document) Accessed 18/11/2019 https://investors.hpe.com/financial/proxy-2019/interactive/proxy/images/HPE-Proxy2019.pdf [p.6] Finally, one of the most critical ways we invest in our collective future is by strengthening the communities where we live and work. We are proud to have both a legacy and a modern-day commitment to community engagement and support. Last year, we donated to more than 4,300 charities in 41 countries, delivered eHealth solutions to more than 500,000 patients in 18 Indian states, provided more than \$14.5 million in loans to entrepreneurs in 85 countries, and launched a global day of service across every geography. We reduced our greenhouse gas emissions by 25% and introduced important sustainability goals and smart city partnerships that earned global awards and recognition.</p> <p>[1] Anti-Corruption Policy (Document) Accessed 18/11/2019 https://h20195.www2.hpe.com/v2/GetDocument.aspx?docname=A00000574ENW [p.5] Sponsorships</p> <p>As used in this Policy, a "Sponsorship" is when HPE provides financial support, products, services, or anything of value to a third party (including charitable organizations), in return for the right to associate our image, brand or products with an activity, or receive some other lawful benefit, such as participation in an event. Any sponsorship must comply with the Sponsorship Policy and must receive the appropriate approval. In addition, when considering paying for a sponsorship, you must:</p> <ul style="list-style-type: none"> • Never provide a sponsorship to improperly influence anyone or obtain an improper advantage. • Never provide a sponsorship that creates the appearance of a bribe, kickback, or other corrupt practice. • Ensure that the sponsorship is consistent with HPE's core values. • Memorialize all sponsorship agreements in writing and document what HPE is paying and receiving. • Make the payments to the entity not to an individual. • Follow the principles in this Policy and the Global Business Amenities Policy with respect to giving away anything HPE receives for the sponsorship, such as tickets to the event we are sponsoring. <p>[p.6] Charitable Contributions</p> <p>HPE seeks to address social needs through strategic philanthropic investments that support our communities, build brand equity and align with HPE business priorities. HPE's Corporate Affairs administers the company's charitable contributions and grant-making protocols, ensuring charitable actions are fair and transparent, comply with global anti-corruption laws, and reflect HPE values and business and social interests. Any payment to a charitable organization must:</p> <ul style="list-style-type: none"> • Not create the appearance of a bribe, kickback, or other corrupt practice.

- Never be used to directly procure HPE future business or otherwise be made with the intent to obtain or retain business, secure an improper advantage, or induce anyone to act improperly.
- Not be used to circumvent HPE's rules relating to giving business amenities.
- Be consistent with the HPE Conflicts of Interest Policy.

Charitable contributions must receive written pre-approval from Corporate Affairs when required by the Global Charitable Contributions Policy.

Pre-approval from Corporate Affairs and the Ethics & Compliance Office is always required for any charitable contribution made to a public sector entity, any charitable contribution associated with a Public Sector entity or official, or any charitable contribution requested by a Public Sector official, regardless of value.

For more information on these approval requirements, you should consult the HPE Gives website and the Global Charitable Contributions Policy.

5.2 Lobbying

Question												
5.2.1 Does the company have a policy and/or procedure covering responsible lobbying?												
Score												
1												
Comments												
<p>There is some evidence that the company has a policy in place to ensure that its engagement in lobbying is ethical, legal and transparent. In addition, there is evidence that the company provides clear standards of conduct and guidelines for responsible behaviour for its third parties, which clearly include lobbyists.</p> <p>However, there is no publicly available evidence that the company's approach includes oversight mechanisms for lobbyists, nor is it clear that the company's standards of behaviour apply to all in-house, external and association lobbyists. There is also no evidence that the company provides a clear definition of responsible lobbying.</p>												
Evidence												
<p>[39] Living Progress Report 2018 (Document) Accessed 25/11/2019 https://assets.ext.hpe.com/is/content/hpedam/documents/a00069000-9999/a00069386/a00069386enw.pdf [p.54] HPE Board of Directors' Nominating, Governance, and Social Responsibility Committee (NGSR):</p> <p>[...] Oversees our Political Action Committee (PAC), government affairs, and public policy engagement</p> <p>[p.68] Through public policy engagement, we help governments understand how legislation and regulations can either accelerate the adoption of emerging technologies or be a barrier to progress. We advocate for policies that open trade, boost economic development, and expand market opportunities.</p> <p>[p.90] Report section Issue Definition</p> <p>[...]</p> <table><tr><th colspan="3">Medium importance to external stakeholders, high importance to HPE's business success</th></tr><tr><td>Investing in people: <u>Employee health, safety, and well-being</u></td><td>Employee health, safety, and well-being</td><td>Creating a healthy, safe, and secure working environment for all HPE employees. Promoting employee well-being.</td></tr><tr><td>Operating responsibly: <u>Public policy engagement</u></td><td>Public policy engagement</td><td>Influencing public policy development through direct engagement and multi-stakeholder associations or initiatives. Responsible and ethical public policy engagement, including lobbying and political contributions. Fulfilling taxation responsibilities to the economies in which HPE operates.</td></tr><tr><td>Driving the circular economy: <u>Environment</u></td><td>Supply chain resilience</td><td>Managing risk and potential exposure of our supply chain to impacts from natural resource constraints, extreme and unpredictable weather events related to climate change, and geographic-specific considerations of supply chain risk.</td></tr></table> <p>[12] Public Policy Priorities (Webpage) Accessed 18/11/2019 https://www.hpe.com/us/en/public-policy.html Political Engagement</p> <p>HPE engagement in the political process is ethical, legal, and transparent. In the U.S., we advance our political objectives through the HPE PAC, which contributes to candidates and committees aligned with our public policy objectives, and through limited corporate contributions where permitted by law.</p> <p>[19] US Public Sector Code of Conduct (Document) Accessed 20/11/2019 https://h20195.www2.hpe.com/V2/GetPDF.aspx/c04909622.pdf Consultants</p> <p>Federal, state, or local laws may require disclosure of, and place limits on, payments to consultants, representatives, lobbyists, or other third parties in dealings with the government. For example, an arrangement to</p>	Medium importance to external stakeholders, high importance to HPE's business success			Investing in people: <u>Employee health, safety, and well-being</u>	Employee health, safety, and well-being	Creating a healthy, safe, and secure working environment for all HPE employees. Promoting employee well-being.	Operating responsibly: <u>Public policy engagement</u>	Public policy engagement	Influencing public policy development through direct engagement and multi-stakeholder associations or initiatives. Responsible and ethical public policy engagement, including lobbying and political contributions. Fulfilling taxation responsibilities to the economies in which HPE operates.	Driving the circular economy: <u>Environment</u>	Supply chain resilience	Managing risk and potential exposure of our supply chain to impacts from natural resource constraints, extreme and unpredictable weather events related to climate change, and geographic-specific considerations of supply chain risk.
Medium importance to external stakeholders, high importance to HPE's business success												
Investing in people: <u>Employee health, safety, and well-being</u>	Employee health, safety, and well-being	Creating a healthy, safe, and secure working environment for all HPE employees. Promoting employee well-being.										
Operating responsibly: <u>Public policy engagement</u>	Public policy engagement	Influencing public policy development through direct engagement and multi-stakeholder associations or initiatives. Responsible and ethical public policy engagement, including lobbying and political contributions. Fulfilling taxation responsibilities to the economies in which HPE operates.										
Driving the circular economy: <u>Environment</u>	Supply chain resilience	Managing risk and potential exposure of our supply chain to impacts from natural resource constraints, extreme and unpredictable weather events related to climate change, and geographic-specific considerations of supply chain risk.										

pay a fee for soliciting or obtaining government contracts may be prohibited by law. All consultants hired by HPE are bound by the same laws and regulations that bind HPE employees, and use of a consultant will not insulate HPE or its employees from liability for violations of these rules.

You may never ask or allow a third party to do something on behalf of HPE that you are prohibited from doing as well.

See: Global Business Amenities and Consultants.

[1] Anti-Corruption Policy (Document)

Accessed 18/11/2019

<https://h20195.www2.hpe.com/v2/GetDocument.aspx?docname=A00000574ENW>

[p.9] Using Third Parties

HPE regularly engages third parties, such as channel partners, distributors, resellers, agents, intermediaries, subcontractors, lobbyists, logistics providers, joint venture partners, and other suppliers and vendors. This is one of HPE's biggest areas of risk because HPE can be held responsible for any improper actions of third parties. We must be vigilant when we engage third parties and actively monitor our relationship to ensure that they will conduct business in an ethical manner and that our fee arrangements will not be used as bribes on our behalf, or for other corrupt activity.

Third parties must be reputable.

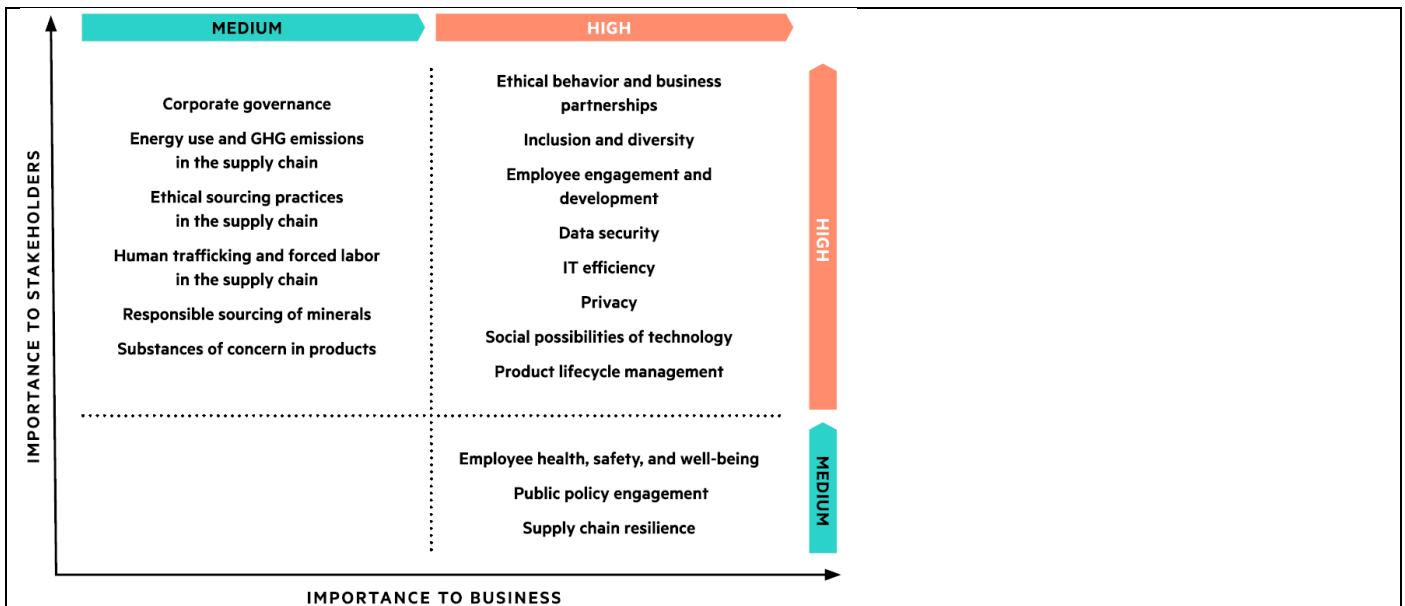
Any third party HPE engages must be an authentic business entity that operates with the highest ethical standards and complies with all applicable laws. Third parties must be chosen on the merits of their services and business practices. We conduct appropriate due diligence. HPE is committed to conducting properly documented risk-based due diligence before retaining agents and contracting with or onboarding business partners and other third parties. Third parties must follow the applicable mandatory onboarding process (e.g., through Global Procurement or the Channel Partner organization), including HPE's Legal and Regulatory Due Diligence when required. Engagements must be in writing and use approved terms and conditions.

[...]

Third parties must be informed of our ethical expectations and agree not to engage in bribery.

HPE expects every third party it engages to abide by the law and our standards for conducting business. For example, HPE's authorized forms of agreement contain provisions prohibiting third parties from making improper payments and requiring channel partners to comply with HPE's Partner Code of Conduct, among other things. To ensure that HPE receives the benefits of these provisions, you must follow the applicable onboarding process and must use an approved contract template when engaging a third party.

Question
5.2.2 Does the company publish details of the aims and topics of its public policy development and lobbying activities it carries out?
Score
2
Comments
<p>There is evidence that the company publishes some details of the aims and topics on which it conducts lobbying. The company publishes clear policy priorities for different areas of the business and provides some information on their relevance to stakeholders. In addition, there is evidence to indicate that these priorities cover multiple relevant jurisdictions and it is clear that this information is updated on an annual basis.</p>
Evidence
<p>[39] Living Progress Report 2018 (Document) Accessed 25/11/2019 https://assets.ext.hpe.com/is/content/hpedam/documents/a00069000-9999/a00069386/a00069386enw.pdf [p.68] Through public policy engagement, we help governments understand how legislation and regulations can either accelerate the adoption of emerging technologies or be a barrier to progress. We advocate for policies that open trade, boost economic development, and expand market opportunities.</p> <p>POLICY PRIORITIES</p> <p>The actions of policy makers influence how emerging technologies are developed, deployed, and adopted. As our personal and professional lives become more intertwined with technology, policy decisions become increasingly important. We engage in public policy discussions to advance the adoption of technologies such as high-performance computing (HPC), artificial intelligence (AI), and the Internet of Things (IoT). We encourage governments to open markets, foster a competitive landscape, and ensure that technology improves the way we live and work.</p> <p>In 2018, we advanced significant public policy developments impacting technology, including:</p> <ul style="list-style-type: none"> • Spectrum allocation—We actively participated in a U.S. coalition encouraging the Federal Communications Commission to open the 6 GHz band, a development that would quintuple the available spectrum for anticipated growth in Wi-Fi traffic. • Investments in HPC—In the U.S., HPE worked with Congress as it passed record government funding for HPC technologies at the Department of Defense and Department of Energy. Internationally, HPE worked closely with EU institutions, various EU member states, and others as they developed and advanced strategies on HPC. • Government advisement on AI—HPE continues to serve as a trusted advisor to governments on the positive potential of AI and emerging policy issues. In the U.S., we participated in the development of the U.S. National Artificial Intelligence Strategic Plan and research road map with the National Science Foundation. We also contributed to the EU High-Level Expert Group on AI, which shapes AI policy and adoption. • Edge and IoT—At Startup India incubation and innovation centers, HPE teams advance citizen-centric smart city solutions, collaborating with cities, startups, professors, and students. HPE is also assessing how AI-based smart city solutions can be brought to the city of Darmstadt, Germany. <p>Additionally, we participated in public policy engagement to address social issues associated with technology. This includes working to address forced labor and human trafficking in the IT sector's global supply chain. Read about our work to counter modern slavery in Ethical sourcing.</p> <p>Details on our policy positions, as well as a list of our industry coalitions, are available on our Public Policy website.</p> <p>[p.72] Through ongoing stakeholder engagement, we continuously evaluate the issues most relevant to our business and our stakeholders. In 2018, we escalated product lifecycle management to a tier-one issue, recognizing new opportunities to drive innovation and brand reputation by accelerating the circular economy for IT. The issues in the following chart met the materiality threshold for this report. Issues are rated by their importance to HPE's business and importance to external stakeholders.</p>



[12] Public Policy Priorities (Webpage)

Accessed 18/11/2019

<https://www.hpe.com/us/en/public-policy.html>

Policy Priorities

We advocate on public policy issues to grow and protect our business. Our engagement with government leaders and global audiences encourages policies that promote innovation, provide access to technology, eliminate barriers to growth, and advance our business priorities.

Internet of Things Powers Transformative Growth

Internet of Things (IoT) will drive economic growth and efficiency with smarter homes, cars, factories, businesses, and entire cities. Governments can advance IoT adoption through public project deployments, increased spectrum availability, harmonization of global standards, and robust security and data protection.

[View Our IoT Solutions](#)

High-Performance Computing Solves Complex Problems

Public-private collaboration and R&D investments are critical to leap to the next level of exascale computing and to maintain U.S. economic competitiveness through leadership in High-Performance Computing.

[View Our HPC Offerings](#)

Connectivity Makes It All Possible

Spectrum availability is essential to the increasingly networked world. Campus connectivity allows innovative delivery of important public services, such as education and healthcare.

Tax Policies Foster Competitiveness

Tax policies drive economic growth and job creation. U.S. tax reform should focus on achieving global competitiveness and encouraging R&D.

Market Access Helps Us Reach Our Customers

Improved market access enables our technologies to reach global customers. Trade agreements must reduce barriers and reflect the digital economy.

Sustainability Guides Our Approach

Sustainability is part of HPE's DNA and guides our operations, innovation strategy, and employee engagement. Our sustainable technologies benefit our company, our customers, and our world. We encourage organizations to consider sustainability as an integral factor in technology decisions to meeting the data needs of the future.

[...]

Political Engagement

HPE engagement in the political process is ethical, legal, and transparent. In the U.S., we advance our political objectives through the HPE PAC, which contributes to candidates and committees aligned with our public policy objectives, and through limited corporate contributions where permitted by law.

[27] Rules Applying to Political Contributions (Webpage)

Accessed 22/11/2019

<https://sbc.hpe.com/en/we-comply-with-the-rules-that-govern-our-business>

Special rules apply to political contributions

[...]

Related Content

[...]

Reporting of Lobbying Activities

Question
5.2.3 Does the company publish full details of its global lobbying expenditure?
Score
0
Comments
There is no evidence that the company publishes any details about its global lobbying expenditure. The company indicates that it has an internal document entitled 'Reporting of Lobbying Activities' which may contain more information on this subject, but it does not appear to be publicly accessible.
Evidence
<p>[27] Rules Applying to Political Contributions (Webpage) Accessed 22/11/2019 https://sbc.hpe.com/en/we-comply-with-the-rules-that-govern-our-business Special rules apply to political contributions</p> <p>[...]</p> <p>Related Content</p> <p>[...]</p> <p>Reporting of Lobbying Activities</p>

5.3 Gifts and Hospitality

Question
5.3.1 Does the company have a policy and/or procedure on gifts and hospitality to ensure they are bona fide to prevent undue influence or other corruption?
Score
2
Comments
<p>Based on publicly available information, there is evidence that the company has a policy on the giving and receipt of gifts and hospitality with clear procedures designed to ensure that such promotional expenses are bona fide and not used for bribery. This policy establishes financial limits, along with an approval procedure, for the different types of promotional expense that employees may encounter.</p> <p>In addition, the company's policy clearly addresses the risks associated with gifts and hospitality given to and/or received from public officials, by specifying a different financial threshold. There is evidence that all gifts and hospitality above certain thresholds are recorded in a dedicated central tool that is accessible to those responsible for oversight of the process.</p>
Evidence
<p>[42] Global Business Amenities Policy (Document) Accessed 06/04/2020 https://www.hpe.com/us/en/pdfViewer.html?docId=a00000573&parentPage=/us/en/about/governance/ethics&resourceTitle=Global+Business+Amenities+Policy [p.3] Introduction</p> <p>This Global Business Amenities Policy establishes HPE's standards for providing or receiving business amenities to or from third parties and helps implement the principles in HPE's Anti-Corruption Policy. This Policy applies to all HPE employees worldwide and for all recipients worldwide, except that amenities to U.S. Public Sector employees are covered separately in the U.S. Business Amenities Policy. An "amenity" is anything of value; amenities may be in the form of gifts, meals, travel, entertainment, prizes, event tickets, loans, or any other item of value.</p> <p>Before providing any business amenity, ask yourself these questions:</p> <ul style="list-style-type: none"> • What is expected if you offer or accept the amenity? Is the amenity in exchange for a reciprocal action or to secure an improper advantage? (If the amenity creates an expectation of receiving anything in return, or appears to do so, then you should not give or accept it.) • Does the amenity create an appearance of impropriety, or an appearance of undue influence? (For example, you should not give or accept an amenity from a counter-party during contract negotiations.) • Is the amenity of a type that is not allowed under this Policy? (Certain types of amenities, such as cash and sexually explicit items, are never allowed.) • Is the recipient Public Sector or Commercial Sector? (As explained further below, what might be acceptable for Commercial Sector recipients might not be acceptable for Public Sector recipients.) • Does the total value of the amenity exceed the limit set forth in this Policy for the particular type of amenity? (Monetary limits based on the type of amenity and recipient are set forth in the tables below.) • Does the amenity exceed the frequency limits set forth in this Policy? (Typically, most amenities are limited to once per quarter.) • Does the amenity violate any country-specific rule? (The country-specific rules are located at the end of this Policy. You should consider the country-specific rules for where the recipient works.) • Have I received the necessary approvals and submitted it in the Amenities Approval Tool if required? (All Events and all Public Sector amenities must be pre-approved through HPE's Amenities Approval Tool. You also must seek pre-approval through the Amenities Approval Tool to give or accept other amenities worth more than \$500, as described below.) <p>This Policy does not cover something given as part of a sale or which the recipient has a contractual right to receive; for example, items of value provided in connection with sales promotions or awards earned from participation in an established sales incentive program. HPE's Anti-Corruption Policy includes guidelines for such activities. Marketing and Sales policies and HPE's Conflict of Interest Policy also may apply.</p>

This Policy addresses business amenities provided to or from third parties. Amenities provided by HPE as a company to HPE employees, or amenities given from one HPE employee to another HPE employee, are not covered by this Policy.

Violations of this Policy may lead to disciplinary action, up to and including termination of employment with HPE. Many countries have established strict laws regarding bribery, and our employees must be aware that their conduct could expose both HPE and themselves to criminal and civil liability.

[p.4] Prohibited Items

HPE employees may never accept or provide the following:

- Any item or entertainment that is illegal, contains sexually explicit content, involves sexually explicit conduct, involves gambling, or would otherwise create embarrassment to the company.
- Excessive, lavish, or frequent amenities.
- Any amenity that is not permissible under the internal rules of the recipient's organization.
- Cash and cash-equivalent gift cards, such as American Express, Visa, or MasterCard gift cards.
- Gold and other precious metals, expensive jewelry, or gemstones.
- Any item or entertainment to or from a third party involved in a pending competitive bid process or contract negotiation with HPE.
- Amenities for the immediate family members (parents, children, spouses, and in-laws), significant others, close friends, and business associates (e.g., agents, consultants, etc.) of third parties. The only exception is the infrequent attendance of an immediate family member or significant other of a Commercial Sector recipient at an activity where the family members or significant others of HPE employees are also attending, or where it would otherwise be customary for a family member or significant other to attend.

You may not use third parties to avoid the limits in this Policy. In other words, you may not indirectly provide or receive any amenity through a third party that this Policy would prohibit you to provide or receive directly. This includes asking a third party to pay for any business amenity on HPE's behalf, for example, asking a partner to pay for an amenity and seek reimbursement from HPE Market Development Funds.

This Policy applies to all things of value that you may give to a third party, regardless of whether the item was purchased by you, someone else, or HPE. Even if the thing of value was provided free of charge or at a reduced cost to you or to HPE, or if you used personal funds for the purchase, you must comply with the rules in this Policy. Similarly, if you are purchasing a business amenity with funds provided by an HPE partner, you must comply with this Policy, including the approval requirements and limits described below.

You may not actively seek a business amenity. HPE employees may never solicit any gift, entertainment, travel, meal, fee, favor, personal discount, or other item of value from any other person or organization.

How to Use this Policy

To determine whether you can provide or receive business amenities, consult the general principles in this Policy, the tables below, and the country-specific rules at the end of this Policy. The tables set forth monetary limits and, where applicable, approval requirements based on the type of recipient (Public Sector, Commercial Sector, or HPE employee) and the type of business amenity. As stated in the tables below, this Policy requires that you always seek approval through HPE's Amenities Approval Tool before providing any amenity to a Public Sector recipient, regardless of value. In other instances, this Policy may require you to seek written approval from your Manager, Director, or Vice President, or through the Amenities Approval Tool, depending on the type and value of the amenity. For more information, see the discussion of Documentation and Approvals.

[p.5] Frequency

As a general rule, you may not give an amenity to the same individual recipient more than once per quarter, and you may not accept an amenity from the same individual or organization more than once per quarter.

A limited exception to this frequency limit exists for low value gifts (\$0–\$50) and low value business meals/entertainment (\$0–\$150), provided that the amenities are given to a Commercial Sector recipient (not Public Sector) or received from a third party; you have a legitimate business purpose for doing so in each instance; the amenities collectively do not create the appearance of impropriety; and you otherwise follow this Policy. As

described below, the frequency limitation also may be relaxed for amenities that are approved through an Amenities Approval Tool request for Event approval and then provided to all attendees of an approved Event. At such Events, attendees may receive multiple amenities offered to all event attendees as a part of the conference experience.

Definitions

“Public Sector” refers to:

- Any officer or employee of a Public Sector entity, or any person acting in an official capacity for or on behalf of a Public Sector entity. A “Public Sector entity” includes any entity in which a government has greater than 50% ownership or is controlled by a government. In countries with government-owned or operated institutions or industries, such as health care, education, energy, telecom, banking, or transportation, you should assume these entities are Public Sector, and you should consult your HPE attorney with any questions.
- Members of royal families.
- Candidates for a political office.
- Immediate family members (parents, children, spouses, and in-laws), significant others, close friends, and business associates of a Public Sector employee.
- Any other person as defined by country-specific rules set forth at the end of this Policy.
- In the United States, public and private K-12 educational institutions and all libraries are considered “Public Sector” entities for the purpose of this Policy and the U.S. Business Amenities Policy.

“Commercial Sector” is anything other than Public Sector, including privately owned and controlled entities.

The “total value” of an amenity is the fair market value of the item that is being provided to a recipient. Normally, “total value” will be the total cost of the item, including taxes, gratuities, and shipping costs. In situations where you or HPE has received the item free or for a discounted price, or where the exact value is otherwise unknown, you must use best efforts (such as an internet search) to calculate fair market value.

[p.6] Events

An “Event” is an activity that involves 10 or more attendees and \$5000 or more in contractual obligations related to arranging the activity, and where HPE products and services are showcased. Activities for fewer than 10 attendees or with less than \$5000 in contractual obligations should be treated as stand-alone amenities, not as “Events” for purposes of this Policy. Events are discussed in more detail in the HPE Meeting and Events Policy.

All Events hosted or co-hosted by HPE (or by a third-party agent engaged by HPE) must be pre-screened through the Amenities Approval Tool—there are no exceptions. In addition, if an HPE employee is actively involved in planning the event, such as by having input into the agenda, the invitees, and/or what business amenities are to be provided, then the HPE employee is also responsible for pre-screening the Event through the Amenities Approval Tool. Otherwise, partner-hosted Events are not required to be screened in the Amenities Approval Tool.

Requests for Event approval should be submitted at least two weeks in advance of issuing invitations, and invitations may not be issued until the Event has been approved. If the Event is approved, you must return to the Amenities Approval Tool and enter details of the Event including actual attendees and total value of business amenities provided.

Although the frequency limits on amenities may be relaxed for Events where a combination of amenities are provided to create a “conference experience,” all Events must comply with the following requirements:

- Events must be for a legitimate purpose to demonstrate or promote HPE’s products and services.
- The entire Event, viewed as a whole, must be primarily about business, and should not be lavish. The business nature of the Event should be apparent from reviewing the agenda and applying reasonable judgment.
- The agenda of the Event should contain at least 80% business activities and no more than 20% leisure activities. The “clock” starts at the beginning of the entire Event, not just the business portion of the Event, and runs during the time when an individual attendee is taking part in any activity that is planned, hosted, or funded by HPE. Business activities include business presentations, exhibitions, Q&A sessions, and transfers to the place of business activities.
- HPE will not pay for any side trips for Event participants.
- A relatively small amount of unscheduled, sightseeing or recreational time is acceptable, provided those activities are minimal and incidental in nature.

- All meals, gifts, and entertainment must be included in the request submitted to the Amenities Approval Tool. This Policy sets forth the acceptable monetary limits and other requirements for amenities provided during an Event.
- Any raffle/lucky draw conducted in connection with an Event must be included in the request submitted to the Amenities Approval Tool. Raffles and lucky draws also should comply with the Raffles/Lucky Draws guidelines.

[p.7] Gifts, Entertainment, and Meals

Gifts for Public Sector recipients outside of the U.S. must be pre-approved through the Amenities Approval Tool. The only exception is business gifts of nominal value with HPE branding, such as pens, calendars, memo pads, T-shirts, and coffee mugs with HPE logos—those HPE branded items do not need pre-screening through the Amenities Approval Tool. You generally may give or accept gifts of nominal value to Commercial Sector recipients, as stated in the tables below.

This Policy distinguishes between “gifts” and “entertainment.” If an HPE employee is attending an activity (such as a concert, theater, or sporting event) with the third party, then the event is considered entertainment. If an HPE employee is not attending, then the tickets are considered gifts. As stated in the tables below, the allowed limits for entertainment are generally higher than those for gifts. All entertainment of Public Sector recipients must be pre-approved through the Amenities Approval Tool.

In addition to the approval requirements and limits described in the tables below, meals and entertainment must comply with the following guidelines:

- Business meals and entertainment must be for the express purpose of furthering a business relationship.
- All meal and entertainment expenses must be reasonable in cost, not lavish, and paid directly to the third-party vendor rather than making any payments for meals or entertainment to the recipient.
- When providing a meal or entertainment, the most senior HPE employee in attendance must pay, and his or her manager must then authorize the charge. Such authorization, however, does not replace pre-approval via the Amenities Approval Tool where required according to this Policy.

If a meal or entertainment is being provided in connection with an HPE-sponsored Event, consult the Events section.

Travel

Travel expenses generally may be offered or accepted for legitimate business purposes, including the promotion, demonstration, or explanation of HPE's products or services.

Travel must comply with the following guidelines:

- All travel for Public Sector customers must be pre-approved through the Amenities Approval Tool. Approval requirements for Commercial Sector and HPE employee travel depend on the value of the travel and whether it is in connection with an Event, as detailed in the tables below.
- Any HPE-sponsored travel should be limited to once per quarter per recipient.
- The class of travel must be appropriate and reasonable: Economy class is required for domestic flights and for international flights less than 5 hours; business class is allowed for international flights longer than 5 hours.
- We do not pay for any travelers to take side trips. Any unscheduled or recreational time (such as sightseeing) should be minimal and incidental in nature.
- All travel expenses must be paid directly to the vendor (i.e., airline, hotel, restaurant, etc.) rather than making any payments to the recipient. Per diem, cash, checks, or equivalents to the third-party travelers are strictly prohibited.
- Travel may not be provided to spouses or other family members or acquaintances of the recipient. Exceptions may be made only upon written approval from the Ethics & Compliance Office.

[p.8]

Business Amenities Limits and Approval Requirements

The limits in the tables below must be followed unless a more restrictive country-specific rule applies.

Table 1. Business Amenities Provided to non-U.S. Public Sector Recipients

(unless more restrictive country-specific rules apply: [click here to check](#))

Type of Business Amenity	Total Value (USD)	Prior Written Approval Requirements
Gifts (including tickets or passes to concerts or sporting events when an HPE employee is not in attendance)	\$0–\$50	Amenities Approval Tool
	\$50.01+	Not allowed
Meals and/or entertainment (when an HPE employee is attending with the recipient)	\$0–\$150	Amenities Approval Tool
	\$150.01+	Not allowed
Travel/accommodations	\$0+	Vice President approval & Amenities Approval Tool
Raffle/lucky draw hosted by HPE	\$0+	Amenities Approval Tool

[p.9]

Table 2. Business Amenities Provided to Commercial Sector Recipients

(unless more restrictive country-specific rules apply: [click here to check](#))

Type of Business Amenity	Total Value (USD)	Prior Written Approval Requirements
Gifts (including tickets or passes to concerts or sporting events when an HPE employee is not in attendance)	\$0–\$50	Approval not required
	\$50.01–\$150	Manager approval
	\$150.01–\$500	Director approval
	\$500.01+	Vice President approval & Amenities Approval Tool
Meals and/or entertainment (when an HPE employee is attending with the recipient)	\$0–\$150	Approval not required
	\$150.01–\$500	Manager approval
	\$500.01+	Vice President approval & Amenities Approval Tool
Travel/accommodations (not related to attendance at an Event that has been separately pre-screened through the Amenities Approval Tool)	\$0–\$500	Vice President approval
	\$500.01+	Vice President approval & Amenities Approval Tool
Combination travel/accommodations, gifts, meals, and/or entertainment (not related to attendance at Event that has been separately pre-screened through the Amenities Approval Tool)	\$0–\$500	See approval requirements for each type of business amenity
	\$500.01+	Vice President approval & Amenities Approval Tool
Raffle/lucky draw hosted by HPE	\$0+	Amenities Approval Tool

Table 3. Business Amenities Received by an HPE Employee from a Third Party

(unless more restrictive country-specific rules apply: [click here to check](#))

Type of Business Amenity	Total Value (USD)	Prior Written Approval Requirements
Gift (including tickets to concerts or sporting events when the third party providing the amenity is not in attendance)	\$0–\$50	Approval not required
	\$50.01–\$150	Manager approval
	\$150.01–\$500	Director approval
	\$500.01+	Vice President approval & Amenities Approval Tool
Meals and/or entertainment (with the third party providing the amenity in attendance)	\$0–\$150	Approval not required
	\$150.01–\$500	Manager approval
	\$500.01+	Vice President approval & Amenities Approval Tool
Travel/accommodations	\$0–\$500	Vice President approval
	\$500.01+	Vice President approval & Amenities Approval Tool
Combination travel/accommodations, gifts, meals, and/or entertainment	\$0–\$500	See approval requirements for each type of business amenity
	\$500.01+	Vice President approval & Amenities Approval Tool
Participation in raffle/lucky draw	\$0–\$999.99	Approval not required
	\$1000+	Manager approval

[p.10] Documentation and Approvals

Business amenities must be provided openly and transparently.

Any required approvals must be in writing and obtained in advance of providing or receiving the business amenity. Approvals must be obtained and pre-screened through the Amenities Approval Tool for all amenities to Public Sector recipients, all Events, and certain other amenities as set forth in the tables above. As a general rule, requests should be submitted to the Amenities Approval Tool at least two weeks in advance. Other than prior approvals, which must be obtained through the Amenities Approval Tool, the written business approvals (e.g., HPE Manager, Director, and Vice President) required by the Policy can be documented through an email or in any other form that creates a record that can be saved. You must keep accurate records of all business amenities provided to or received from any third party (including the name and entity of the third party), and retain them in accordance with the HPE Records Management Policy.

All uses of HPE funds and assets must be documented in compliance with the HPE Accounting and Finance Manual and HPE employees must follow all expense reimbursement rules to obtain reimbursement of business amenities. As a reminder, the most senior person in attendance at a meal/entertainment must pay so that his or her manager would then review and authorize the charge.

Country-Specific Rules

Several countries have adopted country-specific rules related to business amenities. A summary of those laws is contained here. Please contact your local HPE attorney or the Ethics & Compliance Office with any questions.

[1] Anti-Corruption Policy (Document)

Accessed 18/11/2019

<https://h20195.www2.hpe.com/v2/GetDocument.aspx?docname=A00000574ENW>

[p.4] Providing and Receiving Things of Value

We have a duty to spend resources in ethical ways. You may never provide or promise to provide anything of value to a third party to improperly influence a decision on their part. You may provide or accept gifts, meals, travel, entertainment and other items of value only when appropriate. You must never solicit any item of value from any third party. Gifts of nominal value are generally permitted, but cash and expensive or lavish items are not. You must not provide things of value too frequently to the same recipient, and you should never provide anything of value during a competitive bid process or a contract negotiation with the recipient's company. Items and activities that may cause embarrassment to HPE or damage HPE's reputation, such as sexually explicit items or items that involve gambling, are strictly prohibited to be provided to anybody.

HPE's Global Business Amenities Policy and U.S. Business Amenities Policy provide more detailed guidance about business amenities (meaning gifts, meals, travel, entertainment, and other things of value that may be provided to a third party or received from a third party). The Global Business Amenities Policy and U.S. Business Amenities Policy include specific monetary limits on the value of the amenities and the approvals that may be required. For certain higher-risk business amenities, you must obtain approval through the Amenities Approval Tool before offering or providing the amenities to a third party. The following items must be entered into the Amenities Approval Tool for pre-approval: anything of value to public sector recipients, including requests paid for with market development funds; all Events where amenities will be offered to non-HPE attendees; all requests to offer or provide an amenity valued at over \$500 to a commercial sector recipient, apart from amenities associated with attendance at an HPE Event; all HPE-hosted raffles and lucky draws; and all requests by HPE employees to receive an amenity valued at over \$500.

Travel

Unless prohibited by a country-specific rule, HPE may, in limited circumstances, pay for travel (that is, transportation and/or accommodation) for third parties, provided the travel is related to a legitimate HPE business purpose and prior approval has been obtained in accordance with the Global Business Amenities Policy. The following principles apply to HPE-paid travel for third parties:

- Travel must be necessary for a legitimate business meeting or event.
- Any travel must be reasonable, not lavish, and consistent with HPE's internal travel policies and practices, including using HPE-approved hotels and HPE travel services when possible.

- HPE must pay any expenses directly to the service provider, not the traveler. HPE must not pay per diems to the traveler.
- Sightseeing or other recreational activities are allowed only if they are minimal or incidental in nature.
- You must obtain prior approvals as detailed in the Global Business Amenities Policy, including approval through the Amenities Approval Tool where required.

[p.5] HPE Events and Amenities Related to an HPE Event

HPE often invites third parties to attend HPE Events, such as Discover or Aruba Atmosphere. Events are activities that involve 10 or more attendees and \$5,000 or more in contractual obligations. Events are discussed in more detail in the HPE Meeting and Events policy. As part of an HPE Event, you may be able to provide attendees with free access to the Event as well as various business amenities associated with Event attendance, including gifts, travel, meals, entertainment, and other items of value, provided the Event is directly related to the promotion, demonstration, or explanation of HPE products or services. The Event, including all amenities, cannot be lavish. Amenities to be provided in connection with an Event are subject to the Global Business Amenities Policy. When planning an Event or planning to invite anyone to an Event, the following principles apply:

- All events must be pre-screened through the Amenities Approval Tool.
- After the event, the organizer must enter information in the Amenities Approval Tool about who attended and what they received at the event.
- Events must comply with the 80/20 rule: at least 80% of the agenda should comprise business activities, and no more than 20% should comprise leisure activities. Leisure time should not be lavish and should emphasize the business nature of the HPE Event.
- No cash or per diems may be provided. The HPE Event organizer must maintain records of what was provided at the event and records of all third-party attendees as outlined in the Global Business Amenities Policy.

[2] Partner Code of Conduct (Document)

Accessed 18/11/2019

<https://www.hpe.com/us/en/pdfViewer.html?docId=a00042891&parentPage=/us/en/about/governance/policies&resourceTitle=Partner+Code+of+Conduct>

[p.2] Anti-Corruption Laws

Absolute Prohibition on Bribery HPE expects HPE Partners to uphold the highest standards of integrity in all business interactions. HPE has a zero tolerance policy prohibiting any and all forms of bribery, corruption, extortion, kickbacks and embezzlements. All HPE Partners are strictly prohibited from promising, offering, authorizing, giving or accepting anything of value, either directly or indirectly through a third party, in order to obtain or retain business, direct business to any person, or otherwise gain an improper advantage.

For purposes of this policy, "anything of value" includes, but is not limited to, gifts, favors, entertainment, and meals, regardless of their value. HPE Partners must comply with all applicable anti-corruption laws, including but not limited to the U.S. FCPA and the U.K. Bribery Act (collectively, the "Anti-Corruption Laws").

[30] SBC – Gifts and Entertainment – Five Points to Remember (Webpage)

Accessed 22/11/2019

<https://sbc.hpe.com/en/we-follow-the-rules-that-apply-to-gifts-meals-and-entertainment>

Gifts, meals, travel, and entertainment constitute items of value that we may give to third parties only in appropriate circumstances. You need to take the utmost care when you are contemplating giving anything to a third party. Never give anything to anyone in circumstances that could improperly influence business decisions, or even create the appearance of improper influence. And always ensure your actions pass the headline test.

ASK THE RIGHT QUESTIONS

Five things you need to know

Q: What is a business amenity?

A business amenity is:

any item of value

given or received by an HPE employee

Items of value include meals, gifts, travel, and entertainment. Amenities also include anything of value given by a third party on our behalf. Consult our Third Parties section for additional considerations.

Q: Are there limits on what I can provide to a customer, partner, or other person on behalf of HPE?

Yes. HPE has restrictions on what may be provided to our customers, partners, or other third parties based on the type and value of the amenity, as well as the recipient's role and location. Some amenities require pre-approval. In those instances, you must submit a request to the Amenities Approval Tool.

For more information on these rules, consult the Global Business Amenities Policy (or for USPS-related matters, the U.S. Business Amenities Policy).

Q: Are there items of value I can never give or receive?

Yes. The following items are never permitted:

Cash, Visa or Amex gift cards, gold, or expensive jewelry

Any item that is illegal, sexually explicit, or involves gambling

Any gifts exchanged during a competitive bid process or contract negotiation

Any gifts to or from the family members, close friends, or business associates of a third party

Any gift that violates the recipient's gift policies

Q: When do I need to use the Amenities Approval Tool?

You must seek pre-approval through the Amenities Approval Tool anytime you are planning on:

Holding an event

Providing anything to public sector employees (both U.S. and non-U.S.)

Conducting a raffle

Providing any gifts, meals, entertainment, and/or travel valued at \$500USD or more to commercial sector recipients

Receiving from third parties any gift, meal, entertainment, and/or travel valued at \$500USD or more

Q: What are the rules for events?

Whenever you plan to host or co-host an event, you need to obtain pre-approval using the Amenities Approval Tool.

Any gifts, meals, travel, and entertainment provided in association with the event must be included in the request submitted to the Amenities Approval Tool. For more information on events, consult the Global Business Amenities Policy.

Related Content

Amenities Approval Tool

Amenities Approval Tool FAQ

Global Business Amenities Policy (GBAP)

Global Business Amenities Policy FAQ

Global Travel Policy

HPE Meeting and Events Policy

U.S. Business Amenities Policy

[31] SBC – Gifts and Entertainment – Ask The Right Questions (Webpage)

Accessed 22/11/2019

<https://sbc.hpe.com/en/we-follow-the-rules-that-apply-to-gifts-meals-and-entertainment>

Before providing an amenity, ask yourself the following questions:

Is the recipient commercial, U.S. public sector, or non-U.S. public sector?

Different rules apply: for commercial and non-U.S. public sector rules, consult the appropriate sections of the Global Business Amenities Policy (GBAP); for U.S. public sector rules, consult the U.S. Business Amenities Policy (USBAP).

Does giving this amenity violate the headline test or create an appearance of impropriety?

If so, stop. You may not provide the amenity in these circumstances.

Does the amenity violate any country-specific laws?

Some countries have specific rules. Make sure you consult the correct section of the applicable policy to ensure you apply the right rules. (For the GBAP, a country-by-country list appears at the end.)

Do I need to obtain approvals?

Depending on the type of amenity, its value, and the recipient, you may need to secure pre-approval. Consult our policy, and if necessary, use the Amenities Approval Tool.

[19] US Public Sector Code of Conduct (Document)

Accessed 20/11/2019

<https://h20195.www2.hpe.com/V2/GetPDF.aspx/c04909622.pdf>

[p.2] Guidelines

Gifts, bribes, gratuities, and kickbacks

You may not offer, give or promise to give (directly or indirectly) anything of value to employees of the following institutions unless the recipient pays its fair market value:

- US. state, local or federal government
- Public higher education institution
- Public or private K-12 educational institution
- Public or private library

This includes gifts, meals, entertainment or travel.

The prohibition on gifts to private or public K-12 educational institutions and libraries includes those entities' board members, employees, officers, representatives, agents, consultants, or independent contractors. You also may not offer, give, solicit, or receive any gift or other thing of value (directly or indirectly) to or from one of these entities in exchange for favorable treatment or advantage, or for the purpose of obtaining or attempting to influence the award of a contract or subcontract. See: U.S. Business Amenities Policy.

[p.3] Procurement integrity

You may not knowingly obtain or attempt to obtain another contractor's bid or proposal information or the government's source selection information before the award of a government contract to which the information relates. Additionally, you may not attempt to influence an ongoing source selection by means other than the bid and proposal process.

[39] Living Progress Report 2018 (Document)

Accessed 25/11/2019

<https://assets.ext.hpe.com/is/content/hpedam/documents/a00069000-9999/a00069386/a00069386enw.pdf>

[p.55] Our anti-corruption program includes:

[...]

Tools and training to help employees identify and avoid potential issues, including the Amenities Approval Tool (AAT). We strengthened the amenities approval process this year by improving data collection and reporting within the AAT and by updating training for users and approvers.

[36] Corporate Ethics (Webpage)

Accessed 25/11/2019

<https://www.hpe.com/us/en/about/governance/ethics.html>

Our Anti-corruption Policy provides the guidelines and principles to help directors, officers, and employees worldwide uphold our anti-corruption commitment, while our Global Business Amenities Policy establishes limits, approvals, and requirements for employees to follow when providing and receiving business amenities to or from third parties.

6. Supply Chain Management

Question
6.1. Does the company require the involvement of its procurement department in the establishment of new supplier relationships and in the oversight of its supplier base?
Score
2
Comments
<p>Based on publicly available information, there is evidence that the company requires the involvement of its procurement department in the establishment of new suppliers. It is clear that this department is ultimately responsible for providing oversight of the company's supplier base. In addition, there is evidence that the company assures itself that it performs proper procedures regarding the onboarding of suppliers on an annual basis, through audits and reviews.</p>
Evidence
<p>[35] Supply Chain Responsibility (Document) Accessed 25/11/2019 https://assets.ext.hpe.com/is/content/hpedam/documents/a00001000-1999/a00001852/a00001852enw.pdf [p.2] The HPE Supply Chain Responsibility Program</p> <p>We share a responsibility with our suppliers to protect workers, communities, and the environment in our supply chain. Our extensive Supply Chain Responsibility (SCR) program guides our approach to assessing risks, monitoring and improving performance, and working collaboratively with suppliers to share knowledge on key issues.</p> <p>The mission of HPE's SCR program is to protect and elevate workers, and to reduce global and community environmental impacts while creating benefits for the company, our business partners, and our customers. Indeed, our efforts help us to retain a stable, high-quality supply chain, ensuring we remain a trusted sourcing partner to our customers. We continually revise our SCR program, founded in 2001, to realize our vision of a sustainable supply chain.</p> <p>[p.3] Leadership and transparency Leadership and transparency are central to our SCR program. Openly reporting supply chain risks and social and environmental performance data leads to a more robust and resilient supply chain with positive impacts on people and the environment. Transparency is critical to effective stakeholder engagement, informed decision-making, accountability, and progress toward cross-sectoral issues. We publicly report key information about our suppliers and their SER performance year-over-year, which helps us hold ourselves and our suppliers accountable.</p> <p>[p.5] Supplier SER development We focus our resources according to the identified risks posed by suppliers and aim to improve long-term SER performance by building suppliers' capabilities through sustained engagement. Because HPE works to identify and address SER risks at many levels, we are able to tailor our engagement to the specific needs of individual suppliers. Some suppliers may present a greater risk for poor SER performance, and therefore necessitate greater engagement on our part. As new risks are detected, we leverage our toolkit or develop new tools.</p> <p>The four phases of SER supplier development (see Figure 2) provide a framework for engagement through our SCR program. Since our SCR program began, all of our key production suppliers have completed the assessment and positioning for engagement phases. In line with our risk-based approach, our primary focus is on suppliers with whom we have a direct contractual relationship, including final assembly and strategic component suppliers. However, when we identify specific risks or opportunity to have a significant impact, we may also engage suppliers deeper in our supply chain.</p>



Note: Number of suppliers reaching each phase, cumulative

[p.6] **Phase 1: Assessment** We consider the risk profile of every supplier and conduct a formal preliminary risk assessment if necessary. Key suppliers may also undergo site-based onboarding assessments. This motivates suppliers to value SER performance and build relevant standards into their management systems early in the business relationship.

We assess the following risk factors:

- **Location:** Risk is higher in some geographic locations than others.
- **Procurement category:** Risk is higher in some procurement categories. High-risk categories include manufacturing and assembly of parts/components, call centers, warranty/break fix, reuse/recycling, and branded merchandise. Lower risk categories include consultancy, outsourced financial services, and software licensing.
- **External stakeholder reports:** We consider information highlighted in NGO and other external stakeholder reports and determine whether an action is required.

[...]

Monitoring conformance We use third-party audits and assessments, backed by independent quality verification. We engage with suppliers and monitor their performance through data collection and assessment, consisting of the following elements:

- Third-party on-site audits.

We require regular independent audits against our Supplier Code of Conduct, in two forms:

- Comprehensive audits conducted by an external organization on behalf of HPE and other RBA member companies. The auditing methodology, the Validated Audit Process (VAP), eliminates duplication and promotes audit sharing by providing a common approach among companies. We request that our suppliers use the VAP as an independent assessment of their performance.
- Audits conducted by an external organization to verify audits, or to provide independent investigations of allegations. Alongside regular audits, we sometimes undertake additional assessments on specific risk areas including vulnerable worker groups such as student, dispatch, and foreign migrant workers.

[39] Living Progress Report 2018 (Document)

Accessed 25/11/2019

<https://assets.ext.hpe.com/is/content/hpedam/documents/a00069000-9999/a00069386/a00069386enw.pdf>

[p.58] Our extensive Supply Chain Responsibility program guides our approach to assessing risks, monitoring and improving performance, and working collaboratively with suppliers to share knowledge on key issues. Our efforts help us to retain a stable, high-quality supply chain, ensuring we remain a trusted sourcing partner to our customers.

[1] Anti-Corruption Policy (Document)

Accessed 18/11/2019

<https://h20195.www2.hpe.com/v2/GetDocument.aspx?docname=A00000574ENW>

[p.9] Third parties must be reputable.

Any third party HPE engages must be an authentic business entity that operates with the highest ethical standards and complies with all applicable laws. Third parties must be chosen on the merits of their services and business practices. We conduct appropriate due diligence. HPE is committed to conducting properly documented risk-based due diligence before retaining agents and contracting with or onboarding business partners and other third parties. Third parties must follow the applicable mandatory onboarding process (e.g., through Global Procurement or the Channel Partner organization), including HPE's Legal and Regulatory Due Diligence when required.

Question
6.2 Does the company conduct risk-based anti-bribery and corruption due diligence when engaging or re-engaging with its suppliers?
Score
1
Comments
<p>Based on publicly available information, there is evidence that the company has formal procedures to conduct due diligence on all suppliers, with the highest risk suppliers subject to enhanced due diligence.</p> <p>However, the company receives a score of '1' because it is not clear how frequently the company conducts due diligence, nor that its procedures include checks on beneficial ownership. In addition, there is no clear evidence to suggest that the company might be willing to review or terminate supplier relationships in circumstances where a red flag highlighted in the due diligence cannot be mitigated. It is noted that the company provides additional policies which may contain more information on its approach to supply chain management, but these documents do not appear to be publicly accessible.</p>
Evidence
<p>[1] Anti-Corruption Policy (Document) Accessed 18/11/2019 https://h20195.www2.hpe.com/v2/GetDocument.aspx?docname=A00000574ENW</p> <p>[p.9] Using Third Parties</p> <p>HPE regularly engages third parties, such as channel partners, distributors, resellers, agents, intermediaries, subcontractors, lobbyists, logistics providers, joint venture partners, and other suppliers and vendors. This is one of HPE's biggest areas of risk because HPE can be held responsible for any improper actions of third parties. We must be vigilant when we engage third parties and actively monitor our relationship to ensure that they will conduct business in an ethical manner and that our fee arrangements will not be used as bribes on our behalf, or for other corrupt activity.</p> <p>Third parties must be reputable.</p> <p>Any third party HPE engages must be an authentic business entity that operates with the highest ethical standards and complies with all applicable laws. Third parties must be chosen on the merits of their services and business practices. We conduct appropriate due diligence. HPE is committed to conducting properly documented risk-based due diligence before retaining agents and contracting with or onboarding business partners and other third parties. Third parties must follow the applicable mandatory onboarding process (e.g., through Global Procurement or the Channel Partner organization), including HPE's Legal and Regulatory Due Diligence when required. Engagements must be in writing and use approved terms and conditions.</p> <p>[p.10] Third parties associated with government officials require approvals.</p> <p>You must obtain written approval from the Ethics & Compliance Office before entering into any arrangement with a third party if a government official has or may have an interest, directly or indirectly, in the business opportunity. We must be alert for "red flags" that indicate that a third party may engage in corrupt activities. When you learn of any signs that a third party may engage in improper business practices like bribery, you must take prompt action to obtain reasonable assurance that the third party will not engage in such practices. If you are not sure about what action to take, or if the assurances are not adequate, you should report your concerns to your local HPE attorney or the Ethics & Compliance Office.</p> <p>Examples of "red flags" include:</p> <ul style="list-style-type: none"> • Requests for excessive compensation, discounts, fees, or commissions • The third party is recommended or required by a government official • Comments suggesting improper conduct or bribery • Requests for unusual payment arrangements, like payment in a different name or unrelated country • Refusals to provide detailed invoices • Requests to add multiple subcontractors without clear business justification <p>[25] Standards of Business Conduct - International Trade Laws and Obligations (Webpage)</p>

Accessed 22/11/2019

<https://sbc.hpe.com/en/we-comply-with-the-rules-that-govern-our-business>

As HPE employees, we have an obligation to ensure HPE complies with international trade laws and regulations, including customs and import rules, export controls, sanctions, embargos, and immigration laws.

These obligations include:

- Assigning the appropriate import/export classifications to our products and services
- Screening all customers and business partners before we do business with them
- Conducting necessary due diligence to ensure the products and services we provide are used legally and ethically

[36] Corporate Ethics (Webpage)

Accessed 25/11/2019

<https://www.hpe.com/us/en/about/governance/ethics.html>

In 2014, we expanded controls related to third-party due diligence, including those covering suppliers, global logistics service providers, and the re-screening of existing channel reseller partners. We commissioned enhanced due diligence regarding corruption for those with a high-risk profile.

Question
6.3 Does the company require all of its suppliers to have adequate standards of anti-bribery and corruption policies and procedures in place?
Score
2
Comments
<p>Based on publicly available information, there is evidence that the company requires suppliers to have adequate anti-bribery and corruption policies and procedures in place, including policies that prohibit foreign and domestic bribery and facilitation payments, as well as procedures to address conflicts of interest, gifts and hospitality, and whistleblowing. The company outlines these expectations in both its Supplier Code of Conduct and its Partner Code of Conduct.</p> <p>In addition, there is evidence that the company ensures itself of partners' anti-corruption programmes by assessing their programmes and ensuring standards are implemented where gaps are identified. The company indicates that this assurance is carried out when onboarding new suppliers and then regularly throughout the business relationship.</p>
Evidence
<p>[40] Supplier Code of Conduct (Document) Accessed 25/11/2019 https://h20195.www2.hpe.com/V2/GetDocument.aspx?docname=c04797632&123 [p.6] Hewlett Packard Enterprise requires its Suppliers, their sub-tier suppliers and any other 3rd party agents to uphold the highest standards of ethics in their business operations.</p> <p>The ethics standards are:</p> <p>1) Business Integrity The highest standards of integrity are to be upheld in all business interactions. Suppliers shall have a zero tolerance policy to prohibit any and all forms of bribery, corruption, extortion and embezzlement. All business dealings should be transparently performed and accurately reflected on Supplier's business book and records. Monitoring and enforcement procedures shall be implemented to ensure compliance with anti-corruption laws including but not limited to the United Kingdom Bribery Act and the United States Foreign Corrupt Practices Act.</p> <p>Suppliers should conduct appropriate risk-based diligence prior to engaging contractors or third parties to ensure that such third parties comply with the Hewlett Packard Enterprise Code and the anti-corruption laws. Suppliers are also responsible for ensuring that any third party they engage agrees to abide by business integrity standards that are no less stringent than the provisions of this Code of Conduct.</p> <p>2) No Improper Advantage Bribes or other means of obtaining undue or improper advantage are not to be accepted, promised, offered, authorized, given or accepted. This prohibition covers promising, offering, authorizing, giving or accepting anything of value, either directly or indirectly through a third party, in order to obtain or retain business, direct business to any person, or otherwise gain an improper advantage. Monitoring and enforcement procedures shall be implemented to ensure compliance with anti-corruption laws.</p> <p>[2] Partner Code of Conduct (Document) Accessed 18/11/2019 https://www.hpe.com/us/en/pdfViewer.html?docId=a00042891&parentPage=/us/en/about/governance/policies&resourceTitle=Partner+Code+of+Conduct [p.2] Absolute Prohibition on Bribery HPE expects HPE Partners to uphold the highest standards of integrity in all business interactions. HPE has a zero tolerance policy prohibiting any and all forms of bribery, corruption, extortion, kickbacks and embezzlements. All HPE Partners are strictly prohibited from promising, offering, authorizing, giving or accepting anything of value, either directly or indirectly through a third party, in order to obtain or retain business, direct business to any person, or otherwise gain an improper advantage.</p> <p>For purposes of this policy, "anything of value" includes, but is not limited to, gifts, favors, entertainment, and meals, regardless of their value. HPE Partners must comply with all applicable anti-corruption laws, including but not</p>

limited to the U.S. FCPA and the U.K. Bribery Act (collectively, the “Anti-Corruption Laws”). In addition to the AntiCorruption Laws, there may be other applicable local laws or regulations related to gifts to and entertainment of government officials and/or commercial entities. For example, in the United States and some other countries, gifts to and entertainment of federal, state, or local government officials may be strictly prohibited, regardless of intent. As an HPE Partner, you are required to comply with all applicable laws governing interactions with government officials.

For the avoidance of doubt, HPE Partners are prohibited from promising, offering, authorizing, giving or accepting any “grease” or “facilitation payments” for routine government actions, even where permitted by the FCPA or local laws. HPE also prohibits HPE Partners, or their representatives or employees, from offering or providing cash or non-cash gifts, kickbacks, or entertainment to any HPE employee for any improper purpose, such as influencing him or her to take a course of action. HPE employees are similarly prohibited from soliciting such items. This prohibition extends to immediate family members of both HPE Partner employees or representatives and HPE employees.

[...]

Third Parties Engaged By HPE Partners

HPE Partners must not engage or contract with any third party in connection with any HPE-related business that engages in, or is suspected of engaging in, bribes, kickbacks, improper payments or any other conduct that may violate the Anti-Corruption Laws. HPE Partners may comply with this requirement by conducting appropriate risk-based diligence on any third party that the HPE Partner may engage in connection with HPE-related business in order to ensure that such third party complies with the AntiCorruption Laws. Any and all employees, agents, representatives, subcontractors, or other parties who have been or will be engaged by an HPE Partner in connection with HPE-related business must agree to

[p.3] comply with ethics and compliance standards that are no less stringent than those embodied in this Code of Conduct.

[p.4] Conflicts of Interest

HPE Partners must avoid engaging in any business activity that could create a conflict between their interests as an HPE Partner and HPE Partner’s separate duty or obligation to provide independent advice to a Customer regarding the products or services being procured. In order to avoid actual, potential or apparent conflict of interest situations, HPE Partners are not authorized to operate as an agent partner or to collect an agent commission or fee, or other type of compensation from HPE, where the HPE Partner is under a separate duty or obligation to provide independent, unbiased advice to a Customer regarding the products or services being procured. If a Partner believes that there exists a conflict of interest, or that a potential conflict of interest may arise, the Partner should report all pertinent details to a designated HPE representative. HPE employees are required to comply with HPE’s Standards of Business Conduct. The selection of HPE Partners is based on the quality of their services and their business integrity. HPE holds its employees to high ethical standards and requires them to avoid engaging in any activity that involves even the appearance of impropriety or conflict of interest. HPE Partners must not ask or encourage HPE employees to violate the provisions of HPE’s Standards of Business Conduct.

[...]

Business Controls

HPE Partners must maintain or where necessary establish effective business controls that are capable of preventing and detecting unlawful conduct by their employees and counterparties. By way of guidance,

[p.5] an effective business controls program typically contains at least the following components:

(i) periodic risk assessments that lead to adjustments in their business controls that take into account the current risk environment;

(ii) a high-level commitment to legal and ethics compliance programs, including ethics, anticorruption, environmental, occupational health and safety, commercial practices, and labor programs;

(iii) adoption of clearly articulated Code of Conduct and compliance procedures addressing the foregoing (the Electronic Industry Code of Conduct (EICC) is encouraged as a model for this Code of Conduct);

(iv) adequate resources and designated company representative(s) responsible for overseeing and implementing the legal and ethics compliance programs;

(v) training and continuing advice regarding the legal and ethics compliance programs and HPE Partner policies and procedures;

(vi) appropriate incentives and disciplinary measures for legal and ethical compliance;

(vii) procedures for appropriate riskbased diligence on third parties;

(viii) clearly communicated mechanisms for employees to report misconduct or seek guidance without fear of retaliation, including on a confidential basis, unless prohibited by law.

[39] Living Progress Report 2018 (Document)

Accessed 25/11/2019

<https://assets.ext.hpe.com/is/content/hpedam/documents/a00069000-9999/a00069386/a00069386enw.pdf>

[p.57] At HPE, we hold our supply chain partners to high ethical standards and regularly audit and engage with suppliers to ensure compliance with HPE standards through our Supply Chain Responsibility (SCR) program. Our mission is to protect and elevate workers; reduce global and community environmental impact; and benefit our company, our business partners, and our customers.

[1] Anti-Corruption Policy (Document)

Accessed 18/11/2019

<https://h20195.www2.hpe.com/v2/GetDocument.aspx?docname=A00000574ENW>

[p.8] Facilitation Payments

HPE prohibits facilitation payments by HPE employees or by any third party on HPE's behalf. A facilitation, or "grease," payment is a payment, generally of low value, made to a government official to facilitate or expedite a routine, non-discretionary government activity that the official is required to perform as a matter of course. Examples of these activities include:

- Permits, licenses, or other documents that allow companies to conduct business in a particular country
- Processing of visas and work papers
- Inspections related to transit of goods, for example loading and unloading of cargo
- Certain one-time fees, such as a government-owned utility company activating a telephone line

The only circumstances when HPE permits a facilitation payment is when an HPE employee's health or safety is at risk (such as to expedite an evacuation or airlift for medical attention, or if threatened with a weapon), the person being asked to pay fears physical harm or imprisonment, and there is no safe alternative to complying with the demand.

You must report any demands for facilitation payments, including a demand or payment made by a third party acting on HPE's behalf. The report must be made to corporate.compliance.hpe@hpe.com, an HPE attorney or the Ethics & Compliance Office as soon as possible after the demand. Third parties working with HPE must comply with this policy, and HPE will not reimburse third parties for facilitation payments.

[p.9] Third parties must be informed of our ethical expectations and agree not to engage in bribery. HPE expects every third party it engages to abide by the law and our standards for conducting business. For example, HPE's authorized forms of agreement contain provisions prohibiting third parties from making improper payments and requiring channel partners to comply with HPE's Partner Code of Conduct, among other things. To ensure that HPE receives the benefits of these provisions, you must follow the applicable onboarding process and must use an approved contract template when engaging a third party.

[...]

Third parties must not have a conflict of interest in connection with the particular transaction(s) for which they are engaged. For example, they may not receive payment from HPE if they are also the customer's consultant, paid adviser, or supplier relating to the transaction with HPE, or if they are an employee, officer, director, proxy-holder, affiliate or shareholder of any other party to the transaction. Similarly, the third party may not receive payment from HPE if they are also a family member of any party in the transaction unless: the third party discloses the potential

conflict of interest to HPE; the third party's family member is not involved in and does not benefit from the transaction; and your manager approves the arrangement in writing.

[26] Standards of Business Conduct - Responsible Partners and Suppliers (Webpage)

Accessed 22/11/2019

<https://sbc.hpe.com/en/we-comply-with-the-rules-that-govern-our-business>

We work with responsible partners and suppliers

We build trust with our customers, partners, and suppliers by acting as good corporate citizens, and we expect the same from those in our supply chain. If you learn that a supplier is violating the law or our standards on human rights, foreign migrant workers, or environmental health and safety, you must notify the Ethics and Compliance Office promptly.

[36] Corporate Ethics (Webpage)

Accessed 25/11/2019

<https://www.hpe.com/us/en/about/governance/ethics.html>

We also benchmark our program with those of other companies to identify potential improvements. This information helps us to prioritize employee education and training efforts and focus our audits and assessments of our own operations as well as our suppliers and partners.

Question
6.4 Does the company ensure that its suppliers require all their sub-contractors to have anti-corruption programmes in place that at a minimum adhere to the standards established by the main contractor?
Score
2
Comments
Based on publicly available information, there is evidence that the company takes steps to ensure that the substance of its anti-bribery and corruption programme and standards are required of sub-contractors throughout the supply chain. The company states that suppliers should conduct corruption due diligence on all third parties and require subcontractors to comply with policies of the same stringency as the company's Supplier Code of Conduct.
Evidence
<p>[2] Partner Code of Conduct (Document) Accessed 18/11/2019 https://www.hpe.com/us/en/pdfViewer.html?docId=a00042891&parentPage=/us/en/about/governance/policies&resourceTitle=Partner+Code+of+Conduct</p> <p>[p.2] Third Parties Engaged By HPE Partners HPE Partners must not engage or contract with any third party in connection with any HPE-related business that engages in, or is suspected of engaging in, bribes, kickbacks, improper payments or any other conduct that may violate the Anti-Corruption Laws. HPE Partners may comply with this requirement by conducting appropriate risk-based diligence on any third party that the HPE Partner may engage in connection with HPE-related business in order to ensure that such third party complies with the Anti-Corruption Laws.</p> <p>Any and all employees, agents, representatives, subcontractors, or other parties who have been or will be engaged by an HPE Partner in connection with HPE-related business must agree to</p> <p>[p.3] comply with ethics and compliance standards that are no less stringent than those embodied in this Code of Conduct.</p> <p>[p.4] Business Controls HPE Partners must maintain or where necessary establish effective business controls that are capable of preventing and detecting unlawful conduct by their employees and counterparties. By way of guidance,</p> <p>[p.5] an effective business controls program typically contains at least the following components:</p> <p>[...]</p> <p>(vii) procedures for appropriate risk-based diligence on third parties;</p> <p>[40] Supplier Code of Conduct (Document) Accessed 25/11/2019 https://h20195.www2.hpe.com/v2/Getdocument.aspx?docname=c04797632&123</p> <p>[p.6] Hewlett Packard Enterprise requires its Suppliers, their sub-tier suppliers and any other 3rd party agents to uphold the highest standards of ethics in their business operations.</p> <p>[...]</p> <p>Suppliers should conduct appropriate risk-based diligence prior to engaging contractors or third parties to ensure that such third parties comply with the Hewlett Packard Enterprise Code and the anti-corruption laws. Suppliers are also responsible for ensuring that any third party they engage agrees to abide by business integrity standards that are no less stringent than the provisions of this Code of Conduct.</p>

Question
6.5 Does the company publish high-level results from ethical incident investigations and disciplinary actions against suppliers?
Score
0
Comments
There is no evidence that the company publishes any data on ethical or anti-bribery and corruption reports, investigations or associated disciplinary actions involving its suppliers.
Evidence
No evidence found.

7. Agents, Intermediaries and Joint Ventures

7.1 Agents and Intermediaries

Question
7.1.1 Does the company have a clear policy on the use of agents?
Score
2
Comments
<p>There is evidence that the company has a policy to control the use of agents which address the corruption risks associated with their use and provide details of specific controls to mitigate these risks. As part of this policy, the company commits to establishing and verifying that the use of an agent is, in each case, necessary to perform a legitimate business function. In addition, there is evidence that this policy applies to all of the company's employees worldwide, including those employed by third parties and subsidiaries.</p>
Evidence
<p>[1] Anti-Corruption Policy (Document) Accessed 18/11/2019 https://h20195.www2.hpe.com/v2/GetDocument.aspx?docname=A00000574ENW <p>[p.3] This Policy establishes HPE's global anti-corruption principles and applies to HPE employees worldwide.</p> <p>[p.9] Using Third Parties HPE regularly engages third parties, such as channel partners, distributors, resellers, agents, intermediaries, subcontractors, lobbyists, logistics providers, joint venture partners, and other suppliers and vendors. This is one of HPE's biggest areas of risk because HPE can be held responsible for any improper actions of third parties. We must be vigilant when we engage third parties and actively monitor our relationship to ensure that they will conduct business in an ethical manner and that our fee arrangements will not be used as bribes on our behalf, or for other corrupt activity.</p> <p>Third parties must be reputable. Any third party HPE engages must be an authentic business entity that operates with the highest ethical standards and complies with all applicable laws. Third parties must be chosen on the merits of their services and business practices.</p> <p>We conduct appropriate due diligence. HPE is committed to conducting properly documented risk-based due diligence before retaining agents and contracting with or onboarding business partners and other third parties. Third parties must follow the applicable mandatory onboarding process (e.g., through Global Procurement or the Channel Partner organization), including HPE's Legal and Regulatory Due Diligence when required. Engagements must be in writing and use approved terms and conditions.</p> <p>Third parties must be engaged for legitimate purposes. When engaging a third party in any transaction, you must fully understand the business rationale for engaging the third party and document what the third party did or will do to justify its payment. Among other things, you must understand the role of and need for the third party, ensure that the contract terms specifically describe the services to be performed, and verify that the third party is actually performing the work for which it is being paid. Compensation to third parties must be reasonable according to the level and type of work being performed, and consistent with local laws and industry practice.</p> <p>Compensation may not be paid in cash, and may not be paid to a country or location that is not related to the location of the third party or the services (such as to an "offshore" account). Discounts or rebates that we provide on our products or services to partners and commissions that we pay in connection with sales must be appropriate, properly authorized and approved, and offered for legitimate business reasons. It is important to ensure that no</p> </p>

such discount, rebate or commission ends up in the pocket of a government official or is otherwise used to fund corrupt or inappropriate activities.

Third parties must be informed of our ethical expectations and agree not to engage in bribery.

HPE expects every third party it engages to abide by the law and our standards for conducting business. For example, HPE's authorized forms of agreement contain provisions prohibiting third parties from making improper payments and requiring channel partners to comply with HPE's Partner Code of Conduct, among other things. To ensure that HPE receives the benefits of these provisions, you must follow the applicable onboarding process and must use an approved contract template when engaging a third party.

Third parties must not have a conflict of interest in connection with the particular transaction(s) for which they are engaged.

For example, they may not receive payment from HPE if they are also the customer's consultant, paid adviser, or supplier relating to the transaction with HPE, or if they are an employee, officer, director, proxy-holder, affiliate or shareholder of any other party to the transaction. Similarly, the third party may not receive payment from HPE if they are also a family member of any party in the transaction unless: the third party discloses the potential conflict of interest to HPE; the third party's family member is not involved in and does not benefit from the transaction; and your manager approves the arrangement in writing.

[19] US Public Sector Code of Conduct (Document)

Accessed 20/11/2019

<https://h20195.www2.hpe.com/V2/GetPDF.aspx/c04909622.pdf>

Consultants

Federal, state, or local laws may require disclosure of, and place limits on, payments to consultants, representatives, lobbyists, or other third parties in dealings with the government. For example, an arrangement to pay a fee for soliciting or obtaining government contracts may be prohibited by law. All consultants hired by HPE are bound by the same laws and regulations that bind HPE employees, and use of a consultant will not insulate HPE or its employees from liability for violations of these rules. You may never ask or allow a third party to do something on behalf of HPE that you are prohibited from doing as well.

See: Global Business Amenities and Consultants.

Question
7.1.2 Does the company conduct risk-based anti-bribery and corruption due diligence when engaging or re-engaging its agents and intermediaries?
Score
1
Comments
<p>Based on publicly available information, there is evidence that the company has formal procedures in place to conduct anti-bribery and corruption due diligence prior to engaging agents and intermediaries.</p> <p>However, the company receives a score of '1' because there is no evidence that it commits to not engage or terminate its engagement with agents or intermediaries where risks identified in the due diligence cannot be mitigated. In addition, it is not clear that all agents and the highest risk intermediaries are subject to enhanced due diligence, nor that it conducts and refreshes this due diligence at least every two years or when there is a significant change in the business relationship.</p>
Evidence
<p>[1] Anti-Corruption Policy (Document) Accessed 18/11/2019 https://h20195.www2.hpe.com/v2/GetDocument.aspx?docname=A00000574ENW</p> <p>[p.9] Using Third Parties HPE regularly engages third parties, such as channel partners, distributors, resellers, agents, intermediaries, subcontractors, lobbyists, logistics providers, joint venture partners, and other suppliers and vendors. This is one of HPE's biggest areas of risk because HPE can be held responsible for any improper actions of third parties. We must be vigilant when we engage third parties and actively monitor our relationship to ensure that they will conduct business in an ethical manner and that our fee arrangements will not be used as bribes on our behalf, or for other corrupt activity.</p> <p>Third parties must be reputable. Any third party HPE engages must be an authentic business entity that operates with the highest ethical standards and complies with all applicable laws. Third parties must be chosen on the merits of their services and business practices. We conduct appropriate due diligence. HPE is committed to conducting properly documented risk-based due diligence before retaining agents and contracting with or onboarding business partners and other third parties. Third parties must follow the applicable mandatory onboarding process (e.g., through Global Procurement or the Channel Partner organization), including HPE's Legal and Regulatory Due Diligence when required. Engagements must be in writing and use approved terms and conditions.</p> <p>[p.10] Third parties associated with government officials require approvals.</p> <p>You must obtain written approval from the Ethics & Compliance Office before entering into any arrangement with a third party if a government official has or may have an interest, directly or indirectly, in the business opportunity.</p> <p>We must be alert for "red flags" that indicate that a third party may engage in corrupt activities. When you learn of any signs that a third party may engage in improper business practices like bribery, you must take prompt action to obtain reasonable assurance that the third party will not engage in such practices. If you are not sure about what action to take, or if the assurances are not adequate, you should report your concerns to your local HPE attorney or the Ethics & Compliance Office.</p> <p>Examples of "red flags" include:</p> <ul style="list-style-type: none"> • Requests for excessive compensation, discounts, fees, or commissions • The third party is recommended or required by a government official • Comments suggesting improper conduct or bribery • Requests for unusual payment arrangements, like payment in a different name or unrelated country • Refusals to provide detailed invoices • Requests to add multiple subcontractors without clear business justification <p>[p.10] Agent Commissions</p>

Although sales agents and intermediaries can be important partners in a sale, the payment of transaction-specific sales commissions to a third party may pose anti-corruption risks. Accordingly, the following “Agent Controls” must be met before any sales commission or fee to a third party is authorized:

[...]

- Due Diligence. Only agents and sales intermediaries who have completed and passed HPE’s Legal and Regulatory Due Diligence process may be retained.

[39] Living Progress Report 2018 (Document)

Accessed 25/11/2019

<https://assets.ext.hpe.com/is/content/hpedam/documents/a00069000-9999/a00069386/a00069386enw.pdf>

[p.55] Our anti-corruption program includes:

[...]

- Process controls to review higher-risk transactions and screen third-party partners. We identify countries at a high risk for corruption based in part on Transparency International’s Corruption Perceptions Index.

[2] Partner Code of Conduct (Document)

Accessed 18/11/2019

<https://www.hpe.com/us/en/pdfViewer.html?docId=a00042891&parentPage=/us/en/about/governance/policies&resourceTitle=Partner+Code+of+Conduct>

[p.1] Further, HPE requires that HPE Partners

[...]

(5) provide certification of their compliance with these laws and complete all related HPE training and due diligence as and when requested by HPE.

[p.5] Investigations and HPE’s Ongoing Monitoring of the HPE Partners’ Compliance

HPE Partners must, consistent with applicable laws and contractual obligations, provide reasonable assistance to any investigation by HPE of a violation of this Partner Code of Conduct or of a violation by an HPE employee of HPE’s Standards of Business Conduct if related to the HPE Partners’ business or applicable laws relevant to their HPE Partner status, and to allow HPE reasonable access to all documentation concerning the HPE Partners’ compliance with this Partner Code of Conduct and laws applicable to their sale and distribution of HPE products.

[36] Corporate Ethics (Webpage)

Accessed 25/11/2019

<https://www.hpe.com/us/en/about/governance/ethics.html>

In 2014, we expanded controls related to third-party due diligence, including those covering suppliers, global logistics service providers, and the re-screening of existing channel reseller partners. We commissioned enhanced due diligence regarding corruption for those with a high-risk profile.

Question
7.1.3 Does the company aim to establish the ultimate beneficial ownership of its agents and intermediaries?
Score
0
Comments
<p>There is some evidence that the company assesses the ownership of third parties in instances where it suspects government officials may have a direct or indirect interest in the company. However, there is no clear evidence that the company aims to establish the beneficial ownership of all its agents as part of its due diligence process, nor is there clear evidence that it commits to not engage or terminate its relationship with an agent if beneficial ownership cannot be established.</p>
Evidence
<p>[1] Anti-Corruption Policy (Document) Accessed 18/11/2019 https://h20195.www2.hpe.com/v2/GetDocument.aspx?docname=A00000574ENW</p> <p>[p.9] Third parties must be reputable. Any third party HPE engages must be an authentic business entity that operates with the highest ethical standards and complies with all applicable laws. Third parties must be chosen on the merits of their services and business practices. We conduct appropriate due diligence. HPE is committed to conducting properly documented risk-based due diligence before retaining agents and contracting with or onboarding business partners and other third parties. Third parties must follow the applicable mandatory onboarding process (e.g., through Global Procurement or the Channel Partner organization), including HPE's Legal and Regulatory Due Diligence when required. Engagements must be in writing and use approved terms and conditions.</p> <p>[p.10] Third parties associated with government officials require approvals.</p> <p>You must obtain written approval from the Ethics & Compliance Office before entering into any arrangement with a third party if a government official has or may have an interest, directly or indirectly, in the business opportunity.</p>

Question
7.1.4 Does the company's anti-bribery and corruption policy apply to all agents and intermediaries acting for or on behalf of the company, and does it require anti-bribery and corruption clauses in its contracts with these entities?
Score
2
Comments
<p>Based on publicly available information, there is evidence that the company's Partner Code of Conduct applies to all agents and intermediaries acting for or on its behalf. The company indicates that all agents and intermediaries are subject to anti-bribery and corruption clauses in their contracts, which include audit and termination rights to detect, control and prevent breaches.</p>
Evidence
<p>[2] Partner Code of Conduct (Document) Accessed 18/11/2019 https://www.hpe.com/us/en/pdfViewer.html?docId=a00042891&parentPage=/us/en/about/governance/policies&resourceTitle=Partner+Code+of+Conduct <p>[p.1] Introduction</p> <p>At Hewlett Packard Enterprise (HPE), we work collaboratively with our Partners to conduct business with passion for our customers and products, respect for individuals, and uncompromising integrity in our business dealings. References in this Code of Conduct to HPE products include HPE service offerings as well as HPE hardware, software, supplies, and other products.</p> <p>To meet these objectives, HPE expects its Partners to maintain the highest standards of business ethics; become familiar with and comply with all laws that are relevant to their HPE Partner status, including the extraterritorial laws that govern the conduct of HPE, such as the United States Foreign Corrupt Practices Act ("FCPA"), the U.K. Bribery Act, and similar anti-corruption laws of other countries where the Partner does business or which otherwise apply to the Partner; and stay abreast of all legal and regulatory changes that are relevant to their HPE Partner status.</p> <p>Further, HPE requires that HPE Partners</p> <ol style="list-style-type: none"> (1) implement effective business controls that prevent and detect unlawful conduct; (2) comply with and agree to contractual provisions that require strict adherence to all applicable anti-corruption laws and other laws that are relevant to their HPE Partner status and their HPE Partner business; (3) grant HPE audit rights to review the Partners' compliance with such laws relevant to their HPE partner status; (4) to the extent they become aware, proactively report to HPE actual or potential violations of this Partner Code of Conduct or applicable laws involving HPE products by their employees and representatives, as well as actual or potential violations of HPE's Standards of Business Conduct, this Partner Code of Conduct, and applicable laws by HPE's employees and representatives; and (5) provide certification of their compliance with these laws and complete all related HPE training and due diligence as and when requested by HPE. <p>Although HPE recognizes the different legal and cultural environments in which its Partners operate throughout the world, HPE Partners must comply with the fundamental legal and ethical principles escribed in this Partner Code of Conduct. This Partner Code of Conduct is applicable to HPE Partners, their employees, temporary employees, agents, independent contractors, and subcontractors. An HPE Partner is any party selling HPE products, including distributors, OEMs, resellers, agents, and any other party to an HPE partner or channel agreement.</p> <p>An HPE Partner also includes any party providing services directly or indirectly to HPE in support of HPE business, such as system integrators, logistics companies and other service providers to HPE supporting HPE business with its customers. A breach of this Partner Code of Conduct will be considered a breach of the Partner's contract with HPE and may lead to the termination of the business relationship with HPE.</p> <p>[p.4] Conflicts of Interest</p> </p>

HPE Partners must avoid engaging in any business activity that could create a conflict between their interests as an HPE Partner and HPE Partner's separate duty or obligation to provide independent advice to a Customer regarding the products or services being procured.

In order to avoid actual, potential or apparent conflict of interest situations, HPE Partners are not authorized to operate as an agent partner or to collect an agent commission or fee, or other type of compensation from HPE, where the HPE Partner is under a separate duty or obligation to provide independent, unbiased advice to a Customer regarding the products or services being procured.

If a Partner believes that there exists a conflict of interest, or that a potential conflict of interest may arise, the Partner should report all pertinent details to a designated HPE representative. HPE employees are required to comply with HPE's Standards of Business Conduct. The selection of HPE Partners is based on the quality of their services and their business integrity.

HPE holds its employees to high ethical standards and requires them to avoid engaging in any activity that involves even the appearance of impropriety or conflict of interest. HPE Partners must not ask or encourage HPE employees to violate the provisions of HPE's Standards of Business Conduct.

[...]

Business Controls

HPE Partners must maintain or where necessary establish effective business controls that are capable of preventing and detecting unlawful conduct by their employees and counterparties. By way of guidance,

[p.5] an effective business controls program typically contains at least the following components:

- (i) periodic risk assessments that lead to adjustments in their business controls that take into account the current risk environment;
- (ii) a high-level commitment to legal and ethics compliance programs, including ethics, anticorruption, environmental, occupational health and safety, commercial practices, and labor programs;
- (iii) adoption of clearly articulated Code of Conduct and compliance procedures addressing the foregoing (the Electronic Industry Code of Conduct (EICC) is encouraged as a model for this Code of Conduct);
- (iv) adequate resources and designated company representative(s) responsible for overseeing and implementing the legal and ethics compliance programs;

[19] US Public Sector Code of Conduct (Document)

Accessed 20/11/2019

<https://h20195.www2.hpe.com/V2/GetPDF.aspx/c04909622.pdf>

Consultants

Federal, state, or local laws may require disclosure of, and place limits on, payments to consultants, representatives, lobbyists, or other third parties in dealings with the government. For example, an arrangement to pay a fee for soliciting or obtaining government contracts may be prohibited by law. All consultants hired by HPE are bound by the same laws and regulations that bind HPE employees, and use of a consultant will not insulate HPE or its employees from liability for violations of these rules. You may never ask or allow a third party to do something on behalf of HPE that you are prohibited from doing as well.

See: Global Business Amenities and Consultants.

[1] Anti-Corruption Policy (Document)

Accessed 18/11/2019

<https://h20195.www2.hpe.com/v2/GetDocument.aspx?docname=A00000574ENW>

[p.9] Using Third Parties

HPE regularly engages third parties, such as channel partners, distributors, resellers, agents, intermediaries, subcontractors, lobbyists, logistics providers, joint venture partners, and other suppliers and vendors. This is one of HPE's biggest areas of risk because HPE can be held responsible for any improper actions of third parties. We

must be vigilant when we engage third parties and actively monitor our relationship to ensure that they will conduct business in an ethical manner and that our fee arrangements will not be used as bribes on our behalf, or for other corrupt activity.

[p.10] Agent Commissions

Although sales agents and intermediaries can be important partners in a sale, the payment of transaction-specific sales commissions to a third party may pose anti-corruption risks. Accordingly, the following “Agent Controls” must be met before any sales commission or fee to a third party is authorized:

- Valid Agreement. The agent or sales intermediary must have a written contract with HPE. The contract terms must specifically describe the services to be performed and must include HPE’s standard anti-corruption terms and conditions.

[38] Contingent Worker Code of Conduct Policy (Document)

Accessed 25/11/2019

https://h20168.www2.hpe.com/classC/spwebdocs/HPE001-04_External.pdf

[p.1] Policy

All contingent workers must, under the direction and control of their respective employers, comply with the provisions set out in this Contingent Worker Code of Conduct. Contingent workers must also comply with all laws, rules and government regulations applicable to HPE in their location.

All suppliers of contingent workers to HPE shall ensure that their contingent workers are aware of, trained on, and comply with this Contingent Worker Code of Conduct and all laws, rules and government regulations applicable to HPE in their location.

[p.2] Anti-corruption

Contingent workers must not offer bribes, kickbacks or engage in corrupt practices. Contingent workers must comply with all ethical standards and applicable law in every country in which HPE does business. Anti-corruption: Contingent workers must not offer or provide bribes, kickbacks or gifts to win or retain business or to improperly influence a business decision. Contingent workers are prohibited from offering, promising, or providing money or anything of value, either directly or indirectly, by employees or through other parties, to representatives of commercial entities or to government officials for the purpose of obtaining or retaining business or otherwise gaining a business advantage in any country.

The U.S. Foreign Corrupt Practices Act (FCPA) and the UK Bribery Act (UKBA) prohibit any payment or gift to government officials, political parties, candidates for public or political office for the purpose of winning or keeping business. The UKBA also prohibits any payment or gift to commercial entities for the purpose of winning or keeping business.

- The FCPA and the UKBA apply to the actions of all HPE employees, HPE subsidiaries, joint ventures, contingent workers, agents and representatives.
- In short, anti-corruption means no acceptance or payment of:

- o Anything of value provided for the purpose of winning or keeping business
- o Any form of bribe or kickback

Facilitation Payments:

Unless subjected to duress, contingent workers may not offer or make facilitation payments to any government official for routine government actions, either directly or indirectly. Duress occurs when a contingent worker fears physical harm or imprisonment if the facilitation payment isn’t made and there is no safe alternative to complying with the demand. The duress exception applies only to one-time payment, typically of small value. Repeated facilitation payments or facilitation payments of high value are not permitted. Any payment of a facilitation payment must be reported to HPE Legal within 24 hours of the payment.

[...]

Business gifts and entertainment

Contingent workers may not provide or receive business amenities (gifts, meals, services, entertainment, or anything else of value) when doing so creates the appearance of impropriety or undue influence. This restriction applies to amenities given to or received from representatives of HPE, or its current or potential customers, channel partners, suppliers, other business partners or competitors.

[p.3] Conflicts of interest

Contingent workers must always make decisions in the best interest of HPE and based on the contract with their employer when conducting HPE business. Contingent workers may not receive any personal profit or advantage, other than their compensation from their employer, in connection with any transaction involving HPE.

Contingent workers must not engage in:

- Any activity that would present a conflict of interest related to their employer and/or HPE
- Any activity that could be perceived as a potential conflict of interest related to their employer and/or HPE

Work with third parties

Third parties are identified as HPE competitors, channel partners, suppliers (other than the CW employer) and other HPE business partners and customers. Contingent workers may not work for any third parties while on assignment at HPE if this is specified or covered in the contract with their employer. The HPE contract with the supplier must specify the rules for the relationship with any other third parties (such as channel partners, competitors and customers not defined in the contract).

Business with family or friends

During their HPE assignment, contingent workers must disclose to their employer and HPE all situations where they may be conducting business with members of their family, friends, or others with whom they have a close personal relationship.

Question
7.1.5 Does the company ensure that its incentive schemes for agents are designed in such a way that they promote ethical behaviour and discourage corrupt practices?
Score
2
Comments
<p>Based on publicly available information, there is evidence that the company highlights and addresses incentive structures for agents as a factor in bribery and corruption risk. The company indicates that any sales-based commissions must be proportionate to the level and type of services provided and that such fees must be in line with a commission matrix. In addition, the company states that all payments are subject to approval procedures and that fees are only released upon proof of work completed. The company also commits to paying agents and intermediaries into local bank accounts.</p>
Evidence
<p>[1] Anti-Corruption Policy (Document) Accessed 18/11/2019 https://h20195.www2.hpe.com/v2/GetDocument.aspx?docname=A00000574ENW <p>[p.7] Sales Partner Incentive Programs and Sales Promotions</p> <p>HPE occasionally may run programs in which things of value are offered to channel partners or their sales employees in exchange for specific sales performance. These programs typically are referred to as Sales Partner Incentive Fund (SPIF) programs. From time to time, HPE also may run sales promotions that target end users of HPE equipment and services. Providing a thing of value in connection with an established SPIF program typically will not qualify as a business amenity under HPE's Global Business Amenities Policy, because such programs are contractual in nature: participants have a right to receive specified incentives upon achievement of defined targets. However, because SPIF programs involve the giving of things of value to third parties, these programs must:</p> <ul style="list-style-type: none"> • Have written terms with clear criteria for participation, and defined and measurable targets • Create a contractual entitlement to a specific incentive and contain HPE's standard anti-corruption terms and conditions • Limit participation to authorized channel partners with signed HPE partner agreements and their employees • Have incentives that are not lavish or excessive • Comply with BU-specific rules and policies and receive country counsel approval Sales promotions for end users of HPE equipment and services involve similar considerations. <p>Although things of value provided in connection with sales promotions generally will not qualify as business amenities, HPE must take steps to ensure that promotional programs do not give rise to an appearance of impropriety. Accordingly, sales promotions that offer things of value (other than HPE products or services) in connection with the purchase of a product or service should be limited to Commercial Sector customers. Such promotions should not involve lavish or excessive items or awards, and the things of value should be provided to participating entities only, and never directly to an individual. Sales promotions should have written terms and receive country counsel approval. In all cases, the organizer of the SPIF or sales promotion program must retain records of the program, awards, and recipients.</p> <p>[p.9] Using Third Parties</p> <p>[...]</p> <p>Compensation to third parties must be reasonable according to the level and type of work being performed, and consistent with local laws and industry practice.</p> <p>Compensation may not be paid in cash, and may not be paid to a country or location that is not related to the location of the third party or the services (such as to an "offshore" account). Discounts or rebates that we provide on our products or services to partners and commissions that we pay in connection with sales must be appropriate, properly authorized and approved, and offered for legitimate business reasons. It is important to ensure that no such discount, rebate or commission ends up in the pocket of a government official or is otherwise used to fund corrupt or inappropriate activities.</p> </p>

[p.10] Agent Commissions

Although sales agents and intermediaries can be important partners in a sale, the payment of transaction-specific sales commissions to a third party may pose anti-corruption risks. Accordingly, the following “Agent Controls” must be met before any sales commission or fee to a third party is authorized:

- **Valid Agreement.** The agent or sales intermediary must have a written contract with HPE. The contract terms must specifically describe the services to be performed and must include HPE’s standard anti-corruption terms and conditions.
- **Due Diligence.** Only agents and sales intermediaries who have completed and passed HPE’s Legal and Regulatory Due Diligence process may be retained.
- **Commission Fee/Dual Approval.** Fees paid to agents or sales intermediaries must be reasonable according to the level and type of work performed and align with a written commission matrix that has been approved by your business unit and Finance.
- **Proof of Performance.** Agents and sales intermediaries must demonstrate that they executed the contracted-for activities by submitting detailed proof of performance.
- **Direct Payment.** You must ensure that agent or sales intermediary fees are paid directly to the intended recipient. If a sales agent or intermediary requests that its payment be made to another third party, do not approve the payment and report the request to your manager or the Ethics & Compliance Office.

Question
7.1.6 Does the company publish details of all agents currently contracted to act with and on behalf of the company?
Score
0
Comments
There is no evidence that the company publishes any details of the agents currently contracted to act for or on its behalf.
Evidence
No evidence found.

Question
7.1.7 Does the company publish high-level results from incident investigations and sanctions applied against agents?
Score
0
Comments
There is no evidence that the company publishes any data on ethical or bribery and corruption-related reports, investigations or associated disciplinary actions involving its agents.
Evidence
No evidence found.

7.2 Joint Ventures

Question
7.2.1 Does the company conduct risk-based anti-bribery and corruption due diligence when entering into and operating as part of joint ventures?
Score
1
Comments
<p>Based on publicly available information, there is evidence that the company has formal procedures to conduct risk-based anti-bribery and corruption due diligence prior to entering joint ventures.</p> <p>However, the company receives a score of '1' because there is no clear evidence that the company's due diligence includes checks on the ultimate beneficial ownership of the partner company. There is also no evidence to suggest that joint ventures operating in high risk markets or with high risk partners are subject to enhanced due diligence. It is also unclear whether or how frequently the company repeats due diligence on joint venture partners.</p>
Evidence
<p>[1] Anti-Corruption Policy (Document) Accessed 18/11/2019 https://h20195.www2.hpe.com/v2/GetDocument.aspx?docname=A00000574ENW [p.9] Using Third Parties</p> <p>[...]</p> <p>Third parties must be reputable. Any third party HPE engages must be an authentic business entity that operates with the highest ethical standards and complies with all applicable laws. Third parties must be chosen on the merits of their services and business practices. We conduct appropriate due diligence. HPE is committed to conducting properly documented risk-based due diligence before retaining agents and contracting with or onboarding business partners and other third parties. Third parties must follow the applicable mandatory onboarding process (e.g., through Global Procurement or the Channel Partner organization), including HPE's Legal and Regulatory Due Diligence when required. Engagements must be in writing and use approved terms and conditions.</p> <p>[p.10] Third parties associated with government officials require approvals.</p> <p>You must obtain written approval from the Ethics & Compliance Office before entering into any arrangement with a third party if a government official has or may have an interest, directly or indirectly, in the business opportunity. We must be alert for "red flags" that indicate that a third party may engage in corrupt activities. When you learn of any signs that a third party may engage in improper business practices like bribery, you must take prompt action to obtain reasonable assurance that the third party will not engage in such practices. If you are not sure about what action to take, or if the assurances are not adequate, you should report your concerns to your local HPE attorney or the Ethics & Compliance Office.</p> <p>[2] Partner Code of Conduct (Document) Accessed 18/11/2019 https://www.hpe.com/us/en/pdfViewer.html?docId=a00042891&parentPage=/us/en/about/governance/policies&resourceTitle=Partner+Code+of+Conduct [p.1] Introduction</p> <p>[...] Further, HPE requires that HPE Partners [...] (5) provide certification of their compliance with these laws and complete all related HPE training and due diligence as and when requested by HPE.</p>

Question
7.2.2 Does the company commit to incorporating anti-bribery and corruption policies and procedures in all of its joint venture partnerships, and does it require anti-bribery and corruption clauses in its contracts with joint venture partners?
Score
2
Comments
<p>Based on publicly available information, there is evidence that the company commits to establishing and implementing anti-bribery and corruption policies and procedures in its joint ventures, by requiring the partner to conduct audits as part of its Partner Code of Conduct. There is also evidence that the company includes anti-corruption clauses in its contracts with such entities, with clear audit and termination rights to detect, control and prevent breaches.</p>
Evidence
<p>[1] Anti-Corruption Policy (Document) Accessed 18/11/2019 https://h20195.www2.hpe.com/v2/GetDocument.aspx?docname=A00000574ENW [p.9] Third parties must be informed of our ethical expectations and agree not to engage in bribery. HPE expects every third party it engages to abide by the law and our standards for conducting business. For example, HPE's authorized forms of agreement contain provisions prohibiting third parties from making improper payments and requiring channel partners to comply with HPE's Partner Code of Conduct, among other things. To ensure that HPE receives the benefits of these provisions, you must follow the applicable onboarding process and must use an approved contract template when engaging a third party.</p> <p>[2] Partner Code of Conduct (Document) Accessed 18/11/2019 https://www.hpe.com/us/en/pdfViewer.html?docId=a00042891&parentPage=/us/en/about/governance/policies&resourceTitle=Partner+Code+of+Conduct [p.1] Introduction</p> <p>At Hewlett Packard Enterprise (HPE), we work collaboratively with our Partners to conduct business with passion for our customers and products, respect for individuals, and uncompromising integrity in our business dealings. References in this Code of Conduct to HPE products include HPE service offerings as well as HPE hardware, software, supplies, and other products.</p> <p>To meet these objectives, HPE expects its Partners to maintain the highest standards of business ethics; become familiar with and comply with all laws that are relevant to their HPE Partner status, including the extraterritorial laws that govern the conduct of HPE, such as the United States Foreign Corrupt Practices Act ("FCPA"), the U.K. Bribery Act, and similar anti-corruption laws of other countries where the Partner does business or which otherwise apply to the Partner; and stay abreast of all legal and regulatory changes that are relevant to their HPE Partner status.</p> <p>Further, HPE requires that HPE Partners (1) implement effective business controls that prevent and detect unlawful conduct; (2) comply with and agree to contractual provisions that require strict adherence to all applicable anti-corruption laws and other laws that are relevant to their HPE Partner status and their HPE Partner business; (3) grant HPE audit rights to review the Partners' compliance with such laws relevant to their HPE partner status; (4) to the extent they become aware, proactively report to HPE actual or potential violations of this Partner Code of Conduct or applicable laws involving HPE products by their employees and representatives, as well as actual or potential violations of HPE's Standards of Business Conduct, this Partner Code of Conduct, and applicable laws by HPE's employees and representatives; and (5) provide certification of their compliance with these laws and complete all related HPE training and due diligence as and when requested by HPE.</p> <p>Although HPE recognizes the different legal and cultural environments in which its Partners operate throughout the world, HPE Partners must comply with the fundamental legal and ethical principles described in this Partner Code of Conduct. This Partner Code of Conduct is applicable to HPE Partners, their employees, temporary employees, agents, independent contractors, and subcontractors. An HPE Partner is any party selling HPE products, including distributors, OEMs, resellers, agents, and any other party to an HPE partner or channel agreement. An HPE Partner also includes any party providing services directly or indirectly to HPE in support of HPE business, such as</p>

system integrators, logistics companies and other service providers to HPE supporting HPE business with its customers. A breach of this Partner Code of Conduct will be considered a breach of the Partner's contract with HPE and may lead to the termination of the business relationship with HPE.

Question
7.2.3 Does the company commit to take an active role in preventing bribery and corruption in all of its joint ventures?
Score
0
Comments
There is no publicly available evidence that the company commits to take an active role in preventing bribery and corruption in all of its joint ventures, for example by stipulating provisions for secondments of its senior management, providing specific anti-corruption training or establishing a separate internal audit function.
Evidence
<p>[1] Anti-Corruption Policy (Document) Accessed 18/11/2019 https://h20195.www2.hpe.com/v2/GetDocument.aspx?docname=A00000574ENW [p.9] Third parties must be informed of our ethical expectations and agree not to engage in bribery.</p> <p>HPE expects every third party it engages to abide by the law and our standards for conducting business. For example, HPE's authorized forms of agreement contain provisions prohibiting third parties from making improper payments and requiring channel partners to comply with HPE's Partner Code of Conduct, among other things. To ensure that HPE receives the benefits of these provisions, you must follow the applicable onboarding process and must use an approved contract template when engaging a third party.</p> <p>[2] Partner Code of Conduct (Document) Accessed 18/11/2019 https://www.hpe.com/us/en/pdfViewer.html?docId=a00042891&parentPage=/us/en/about/governance/policies&resourceTitle=Partner+Code+of+Conduct [p.4] III. Compliance and Risk Management System</p> <p>1. Business Controls</p> <p>HPE Partners must maintain or where necessary establish effective business controls that are capable of preventing and detecting unlawful conduct by their employees and counterparties. By way of guidance, ...</p> <p>[p.5] ... an effective business controls program typically contains at least the following components: (i) periodic risk assessments that lead to adjustments in their business controls that take into account the current risk environment; (ii) a high-level commitment to legal and ethics compliance programs, including ethics, anticorruption, environmental, occupational health and safety, commercial practices, and labor programs; (iii) adoption of clearly articulated Code of Conduct and compliance procedures addressing the foregoing (the Electronic Industry Code of Conduct (EICC) is encouraged as a model for this Code of Conduct); (iv) adequate resources and designated company representative(s) responsible for overseeing and implementing the legal and ethics compliance programs; (v) training and continuing advice regarding the legal and ethics compliance programs and HPE Partner policies and procedures; (vi) appropriate incentives and disciplinary measures for legal and ethical compliance; (vii) procedures for appropriate risk-based diligence on third parties; (viii) clearly communicated mechanisms for employees to report misconduct or seek guidance without fear of retaliation, including on a confidential basis, unless prohibited by law.</p>

8. Offsets

Question
8.1 Does the company explicitly address the corruption risks associated with offset contracting, and is a dedicated body, department or team responsible for oversight of the company's offset activities?
Score
0
Comments
There is no evidence that the company addresses the corruption risks associated with offset contracting, nor is there evidence that a dedicated body, department or team is responsible for monitoring of its offset activities.
Evidence
No evidence found.

Question
8.2 Does the company conduct risk-based anti-bribery and corruption due diligence on all aspects of its offset obligations, which includes an assessment of the legitimate business rationale for the investment?
Score
0
Comments
There is no publicly available evidence that the company has formal procedures in place to conduct risk-based anti-bribery and corruption due diligence on its offset obligations.
Evidence
No evidence found.

Question
8.3 Does the company publish details of all offset agents and brokers currently contracted to act with and/or on behalf of the company?
Score
0
Comments
There is no evidence that the company publishes any details of the offset agents, brokers or consultancy firms currently contracted to act with and on behalf of its offset programme.
Evidence
No evidence found.

Question
8.4 Does the company publish details about the beneficiaries of its indirect offset projects?
Score
0
Comments
There is no evidence that the company publishes any details of its offset obligations or contracts.
Evidence
No evidence found.

9. High Risk Markets

Question
9.1 Does the company have enhanced risk management procedures in place for the supply of goods or services to markets or customers in countries identified as at a high risk of corruption?
Score
2
Comments
<p>Based on publicly available information, there is evidence that the company acknowledges the corruption risks associated with operating in different markets and that it has a dedicated assessment process in place to assess such risks. There is evidence to suggest that the results of these assessments have an impact on business decisions and trigger the implementation of additional controls.</p>
Evidence
<p>[36] Corporate Ethics (Webpage) Accessed 25/11/2019 https://www.hpe.com/us/en/about/governance/ethics.html We use internal data and Transparency International's Corruption Perceptions Index to identify countries at high risk for corrupt activity and raise employee awareness of potential issues in these locations.</p> <p>[2] Partner Code of Conduct (Document) Accessed 18/11/2019 https://www.hpe.com/us/en/pdfViewer.html?docId=a00042891&parentPage=/us/en/about/governance/policies&resourceTitle=Partner+Code+of+Conduct [p.1] Although HPE recognizes the different legal and cultural environments in which its Partners operate throughout the world, HPE Partners must comply with the fundamental legal and ethical principles escribed in this Partner Code of Conduct.</p> <p>[35] Supply Chain Responsibility (Document) Accessed 25/11/2019 https://assets.ext.hpe.com/is/content/hpedam/documents/a00001000-1999/a00001852/a00001852enw.pdf [p.2] We take a systematic approach to sensing, understanding, and addressing risk—maintaining awareness of geographic risks, labor trends, and other factors through sources such as industry groups, suppliers, and other stakeholders.</p> <p>[p.6] • Key Performance Indicator (KPI) program.</p> <p>We require key suppliers in high-risk locations to provide additional monthly reporting on KPIs such as working hours, vulnerable workers, and GHG emissions</p> <p>[39] Living Progress Report 2018 (Document) Accessed 25/11/2019 https://assets.ext.hpe.com/is/content/hpedam/documents/a00069000-9999/a00069386/a00069386enw.pdf [p.55] Our anti-corruption program includes:</p> <p>[...]</p> <p>• Process controls to review higher-risk transactions and screen third-party partners. We identify countries at a high risk for corruption based in part on Transparency International's Corruption Perceptions Index.</p>

Question
9.2 Does the company disclose details of all of its fully consolidated subsidiaries and non-fully consolidated holdings (associates, joint ventures and other related entities)?
Score
1
Comments
<p>There is evidence that the company publishes a list of its principal consolidated subsidiaries and affiliates on an annual basis. This list includes information on the country of incorporation for each entity.</p> <p>However, the company receives a score of '1' because there is no publicly available evidence that it discloses the percentage ownership and the country or countries of operation for each entity. The company's publicly available evidence also indicates that the list only contains information on principal subsidiaries and affiliates, and therefore it is not clear that the list represents all of the company's holdings.</p>
Evidence
<p>[4] 2018 Form 10-K (Document) Accessed 18/11/19 https://investors.hpe.com/~media/Files/H/HP-Enterprise-IR/documents/hpe-fy18-form-10-k.pdf [p.176] Exhibit 21</p> <p>Principal Subsidiaries of Hewlett Packard Enterprise Company The registrant's principal subsidiaries and affiliates as of October 31, 2018 are included in the list below.</p> <p>ARGENTINA -Hewlett-Packard Argentina S.R.L.</p> <p>AUSTRALIA -Hewlett-Packard Australia Pty Ltd -HP Enterprise Services Australia Pty Ltd -HP Financial Services (Australia) Pty Limited</p> <p>AUSTRIA -Hewlett-Packard Gesellschaft mbH</p> <p>BELGIUM -Hewlett-Packard Belgium SPRL/BVBA</p> <p>BRAZIL -HP Financial Services Arrendamento Mercantil S.A. -Hewlett-Packard Brasil Ltda.</p> <p>BULGARIA -Hewlett-Packard Bulgaria EOOD</p> <p>CANADA -Hewlett-Packard Financial Services Canada Company</p> <p>CAYMAN ISLANDS -Hewlett-Packard Marigalante Ltd. -Sapphire Holding Co - H3C Holdings Limited - Hewlett-Packard G1 SPV (Cayman) Company -Aruba Networks International Cayman</p> <p>[List of subsidiaries continues over a further 6 pages]</p> <p>[p.184] Exhibit 31.</p>

1 CERTIFICATION I, Antonio F. Neri, certify that:

1. I have reviewed this Annual Report on Form 10-K of Hewlett Packard Enterprise Company;
2. Based on my knowledge, this report does not contain any untrue statement of a material fact or omit to state a material fact necessary to make the statements made, in light of the circumstances under which such statements were made, not misleading with respect to the period covered by this report;
3. Based on my knowledge, the financial statements, and other financial information included in this report, fairly present in all material respects the financial condition, results of operations and cash flows of the registrant as of, and for, the periods presented in this report;

Question										
9.3 Does the company disclose its beneficial ownership and control structure?										
Score										
2										
Comments										
There is evidence that the company is a publicly listed entity trading on the New York Stock Exchange (NYSE) and therefore it is not required to disclose further information on its beneficial ownership in order to receive a score of '2'.										
Evidence										
<p>[10] FT Markets Data – HP Enterprise Co (Webpage) Accessed 18/11/2019 https://markets.ft.com/data/equities/tearsheet/summary?s=HPE:NYQ</p> <div><h1>Hewlett Packard Enterprise Co</h1><p>HPE:NYQ ▼</p><p>Technology > Software & Computer Services</p><table><tr><th>PRICE (USD)</th><th>TODAY'S CHANGE</th><th>SHARES TRADED</th><th>1 YEAR CHANGE</th><th>BETA</th></tr><tr><td>17.22</td><td>↓ -0.005 / -0.03%</td><td>4.18m</td><td>↑ 13.32%</td><td>1.6182</td></tr></table></div>	PRICE (USD)	TODAY'S CHANGE	SHARES TRADED	1 YEAR CHANGE	BETA	17.22	↓ -0.005 / -0.03%	4.18m	↑ 13.32%	1.6182
PRICE (USD)	TODAY'S CHANGE	SHARES TRADED	1 YEAR CHANGE	BETA						
17.22	↓ -0.005 / -0.03%	4.18m	↑ 13.32%	1.6182						

Question
9.4 Does the company publish a percentage breakdown of its defence sales by customer?
Score
0
Comments
There is no evidence that the company publishes any information on its defence sales by customer.
Evidence
No evidence found.

10. State-Owned Enterprises (SOEs)

Question
10.1 Does the SOE publish a breakdown of its shareholder voting rights?
Score
N/A
Comments
N/A
Evidence

Question
10.2 Are the SOE's commercial and public policy objectives publicly available?
Score
N/A
Comments
N/A
Evidence

Question
10.3 Is the SOE open and transparent about the composition of its board and its nomination and appointment process?
Score
N/A
Comments
N/A
Evidence

Question
10.4 Is the SOE's audit committee composed of a majority of independent directors?
Score
N/A
Comments
N/A
Evidence

Question
10.5 Does the SOE have a system in place to assure itself that asset transactions follow a transparent process to ensure they accord to market value?
Score
N/A
Comments
N/A
Evidence

List of Evidence & Sources

No.	Type (Webpage or Document)	Name	Download Date	Link
01	Document	Anti-Corruption Policy	18/11/19	https://h20195.www2.hpe.com/v2/GetDocument.aspx?docname=A00000574ENW
02	Document	Partner Code of Conduct	18/11/19	https://www.hpe.com/us/en/pdfViewer.html?docId=a00042891&parentPage=/us/en/about/governance/policies&resourceTitle=Partner+Code+of+Conduct
03	Webpage	Report an Incident	18/11/19	https://sbc.hpe.com/en/report-an-incident
04	Document	2018 Form 10-K	18/11/19	https://investors.hpe.com/~media/Files/H/HP-Enterprise-IR/documents/hpe-fy18-form-10-k.pdf
05	Document	2019 Proxy Statement	18/11/19	https://investors.hpe.com/financial/proxy-2019/interactive/proxy/images/HPE-Proxy2019.pdf
06	Document	Audit Committee Charter	18/11/19	https://investors.hpe.com/~media/Files/H/HP-Enterprise-IR/documents/committees/audit-committee-charter-october2015.pdf
07	Webpage	Report an Ethics Concern	18/11/19	https://www.hpe.com/us/en/about/governance/report-ethics-concerns.html
08	Webpage	Chief Legal Officer Bio	18/11/19	https://www.hpe.com/emea_europe/en/leadership-bios/john-schultz.html
09	Webpage	Open Ownership Register - HP Enterprise Company	18/11/19	https://register.openownership.org/entities/5ab930b49dfc3fae1835f0bf
10	Webpage	FT Markets Data – HP Enterprise Co	18/11/19	https://markets.ft.com/data/equities/tearsheet/summary?s=HPE:NYQ
11	Document	Corporate Governance Guidelines	18/11/19	https://investors.hpe.com/~media/Files/H/HP-Enterprise-IR/documents/governance/hpe-corporate-governance-guidelines-updated-jan-2016.pdf
12	Webpage	Public Policy Priorities	18/11/19	https://www.hpe.com/us/en/public-policy.html
13	Document	Political Contributions Policy	18/11/19	https://h20195.www2.hpe.com/V2/GetDocument.aspx?docname=A00001848ENW
14	Webpage	Standards of Business Conduct	19/11/19	https://sbc.hpe.com/
15	Webpage	SBC - Message from the Chief Ethics and Compliance Officer	20/11/19	https://sbc.hpe.com/en/message-from-our-chief-ethics-and-compliance-officer
16	Webpage	SBC – We Avoid Conflicts of Interest – Outside Employment	20/11/19	https://sbc.hpe.com/en/we-avoid-conflicts-of-interest
17	Webpage	Our Ethical Conduct – We Follow the Law	20/11/19	https://sbc.hpe.com/en/we-are-an-ethical-company

18	Webpage	SBC – We Avoid Conflicts of Interest – Financial Interests	20/11/19	https://sbc.hpe.com/en/we-avoid-conflicts-of-interest
19	Document	US Public Sector Code of Conduct	20/11/19	https://h20195.www2.hpe.com/V2/GetPDF.aspx/c04909622.pdf
20	Webpage	SBC – We Avoid Conflicts of Interest – Personal Relationships	22/11/19	https://sbc.hpe.com/en/we-avoid-conflicts-of-interest
21	Webpage	SBC – We Avoid Conflicts of Interest – Use of HPE Resources	22/11/19	https://sbc.hpe.com/en/we-avoid-conflicts-of-interest
22	Webpage	SBC - We Win The Right Way	22/11/19	https://sbc.hpe.com/en/we-win-the-right-way
23	Webpage	SBC - We Win The Right Way – Your Obligations	22/11/19	https://sbc.hpe.com/en/we-win-the-right-way
24	Webpage	SBC - We Win The Right Way – Report Concerns And Do Not Retaliate	22/11/19	https://sbc.hpe.com/en/we-win-the-right-way
25	Webpage	Standards of Business Conduct - International Trade Laws and Obligations	22/11/19	https://sbc.hpe.com/en/we-comply-with-the-rules-that-govern-our-business
26	Webpage	Standards of Business Conduct - Responsible Partners and Suppliers	22/11/19	https://sbc.hpe.com/en/we-comply-with-the-rules-that-govern-our-business
27	Webpage	Rules Applying to Political Contributions	22/11/19	https://sbc.hpe.com/en/we-comply-with-the-rules-that-govern-our-business
28	Webpage	SBC - We Work With Third Parties Responsibly – Conflicts of Interest	22/11/19	https://sbc.hpe.com/en/we-work-with-third-parties-responsibly
29	Webpage	SBC - We Work With Third Parties Responsibly – Bribery And Corruption	22/11/19	https://sbc.hpe.com/en/we-work-with-third-parties-responsibly
30	Webpage	SBC – Gifts and Entertainment – Five Points to Remember	22/11/19	https://sbc.hpe.com/en/we-follow-the-rules-that-apply-to-gifts-meals-and-entertainment
31	Webpage	SBC – Gifts and Entertainment – Ask The Right Questions	22/11/19	https://sbc.hpe.com/en/we-follow-the-rules-that-apply-to-gifts-meals-and-entertainment
32	Webpage	Criteria for Assessing Candidates	25/11/19	https://www.hpe.com/us/en/about/government-affairs/engagement-criteria.html
33	Document	2017 Corporate Contributions	25/11/19	https://h20195.www2.hpe.com/v2/GetDocument.aspx?docname=a00071666enw
34	Document	2016 Corporate Contributions	25/11/19	https://h20195.www2.hpe.com/V2/GetDocument.aspx?docname=A00005842ENW
35	Document	Supply Chain Responsibility	25/11/19	https://assets.ext.hpe.com/is/content/hpedam/documents/a00001000-1999/a00001852/a00001852enw.pdf
36	Webpage	Corporate Ethics	25/11/19	https://www.hpe.com/us/en/about/governance/ethics.html
37	Webpage	Contingent Worker Code of Conduct	25/11/19	https://h20168.www2.hpe.com/supplierextranet/cw_codeofconduct.do

38	Document	Contingent Worker Code of Conduct Policy	25/11/19	https://h20168.www2.hpe.com/classC/spwebdocs/HPE001-04_External.pdf
39	Document	Living Progress Report 2018	25/11/19	https://assets.ext.hpe.com/is/content/hpedam/documents/a00069000-9999/a00069386/a00069386enw.pdf
40	Document	Supplier Code of Conduct	25/11/19	https://h20195.www2.hpe.com/v2/Getdocument.aspx?docname=c04797632&123
41	Document	2018 PAC Contributions	26/11/19	https://h20195.www2.hpe.com/v2/Getdocument.aspx?docname=A00048175ENW
42	Document	Global Business Amenities Policy	06/04/20	https://www.hpe.com/us/en/pdfViewer.html?docId=a00000573&parentPage=/us/en/about/governance/ethics&resourceTitle=Global+Business+Amenities+Policy
43	Document	2018 Living Progress Data Summary	18/06/2020	https://h20195.www2.hpe.com/v2/Getdocument.aspx?docname=a00071279enw#
44	Webpage	Updated Corporate Ethics Page	18/06/2020	https://www.hpe.com/us/en/about/governance/ethics.html#Anticorruption
45	Webpage	Ethics Point Whistleblowing Website	18/06/2020	https://secure.ethicspoint.com/domain/media/en/gui/44841/index.html