



**Hewlett Packard**  
Enterprise

# **Hewlett Packard Enterprise Supplier Code of Conduct**

Version 5.0, Effective October 2024



The Responsible Business Alliance (RBA) establishes standards to ensure that working conditions in the electronics industry, or industries in which electronics are a key component, and its supply chains are safe, that workers are treated with dignity and respect, and that business operations are conducted in an environmentally responsible and ethical way. The Hewlett Packard Enterprise Supplier Code of Conduct is based on the RBA Code of Conduct and reflects additional Hewlett Packard Enterprise standards and expectations and the nature of our Suppliers' operations.

This Policy defines the social and environmental performance requirements for Hewlett Packard Enterprise suppliers.

## Scope

All Hewlett Packard Enterprise suppliers must comply with the Hewlett Packard Enterprise Supplier Code of Conduct. HPE suppliers include all entities that provide goods or services, whether to or on behalf of Hewlett Packard Enterprise ("Suppliers"). This includes all Suppliers that are:

- Manufacturing Hewlett Packard Enterprise products, packaging, parts, components, subassemblies, and materials, or are involved in processes related to that manufacturing; and
- Providing services to or on behalf of Hewlett Packard Enterprise, regardless of where the service is being performed, including at a Supplier's site, at an HPE site, or at a customer's site.

## Policy

While we recognize that there are different legal and cultural environments in which Suppliers operate throughout the world, the Hewlett Packard Enterprise Supplier Code of Conduct (the "HPE Code" or "this Code") sets forth the minimum requirements that all Suppliers must meet.

Hewlett Packard Enterprise goes beyond the RBA Code of Conduct and requires additional social and environmental responsibility related requirements including, but not limited to:

- For Suppliers employing student and/or dispatch workers in China the [Hewlett Packard Enterprise Student and Dispatch Worker Standard for Supplier Facilities in the People's Republic of China \(PRC\)](#);
- For Suppliers employing migrant workers the [Hewlett Packard Enterprise Supply Chain Migrant Worker Standard](#);
- For Suppliers of subassemblies, parts, materials, components, batteries, and packaging that are incorporated into HPE brand products the requirements contained in the [Hewlett Packard Enterprise General Specification for the Environment](#);
- For Suppliers who, in the process of fulfilling an HPE contract, including but not limited to contracts for manufacturing, handling, storage, repair, and transportation services for HPE, recycle or dispose of HPE branded and non-branded electronic hardware products or materials the [Vendor Requirements for Hardware Recycling Standard](#);
- For Suppliers and Sub-suppliers who provide reuse, refurbishment, or remarketing services of electronic hardware products, parts, and components on behalf of Hewlett Packard Enterprise the [Vendor Requirements for Hardware Reuse Standard](#); and
- Other requirements as specified.

Suppliers are required to understand and meet these and other requirements where applicable.

The HPE Code is a total supply chain requirement. At a minimum, Suppliers must require their next tier Suppliers to acknowledge and implement the HPE Code and flow down the requirements of the HPE Code down to their sub-tier Suppliers, and along the supply chain. Suppliers should also monitor their own supplier's effective implementation of this Code or the RBA Code of Conduct through risk-based audits. The requirements of the HPE Code apply to all workers including temporary, migrant, student, contract, direct employees, and any other type of worker.

Fundamental to the HPE Code is the understanding that a business, in all of its activities, must operate in full compliance with the laws, rules, and regulations of the countries in which it operates.<sup>1</sup> The HPE Code encourages Suppliers to go beyond legal compliance, drawing upon internationally recognized standards, in order to advance social and environmental responsibility, and business ethics. Where the HPE Code and national or local laws have requirements for the same subject matter, Suppliers must meet the more stringent requirements.

<sup>1</sup> This Code is not intended to create new and additional third-party rights, including for workers



HPE respects human rights as defined by the United Nations Universal Declaration of Human Rights (UDHR). In particular, we respect the rights of vulnerable groups (including migrants, children, and women) and all individuals in accordance with the core ILO conventions<sup>2</sup> and the Convention on the Rights of the Child and the Women's Empowerment Principles.<sup>3</sup> HPE expects our suppliers to also uphold these standards. We commit to the United Nations Guiding Principles on Business and Human Rights (UNGPs). Suppliers should uphold and respect human rights, and be guided by best practice set out in the UNGPs.

The HPE Code is made up of five sections. Sections A, B, and C outline standards for Labor, Health and Safety, and the Environment, respectively. Section D adds standards relating to business ethics; Section E outlines the elements of an acceptable system to manage conformity to the HPE Code. The Reference section outlines the international standards and leading practices which were referenced in the development of the HPE Code and may be useful as an additional source of information.

## A. Labor

Hewlett Packard Enterprise is committed to ensuring that all workers in its supply chain are treated fairly and with dignity and respect. This applies to direct and indirect suppliers, as well as all workers including temporary, migrant, student, contract, direct employees, and any other type of worker.

The labor standards are:

### 1. Prohibition of Forced Labor

Forced, bonded (including debt bondage) or indentured labor; prison labor; or slavery or trafficking of persons is not permitted. This includes transporting, harboring, recruiting, transferring, or receiving persons by means of threat, force, coercion, abduction or fraud for labor or services. There must be no unreasonable restrictions on workers' freedom of movement in the facility, nor unreasonable restrictions on entering or exiting company-provided facilities, including, if applicable, workers' dormitories or living quarters. Workers must have the right to choose their own accommodation. As part of the hiring process, all workers must receive a written employment agreement in their primary language or in a language the worker can understand, that contains a description of terms and conditions of employment prior to the worker departing from his or her country of origin and there must be no substitution or changes(s) allowed in the employment agreement upon arrival in the receiving country unless these changes are made to meet local law and provide equal or better terms. All work must be voluntary. Workers must be free to leave work at any time without penalty, to terminate their employment with reasonable notice, and receive pay for all work carried out, in accordance with the terms in a worker's contract. Suppliers, agents, and sub-agents may not hold or otherwise destroy, conceal, or confiscate identity or immigration documents, such as government-issued identification, passports, or work permits, or other personal assets. Employers can only hold documentation if such holdings are required by law. In this case, at no time should workers be denied access to their documents or assets. Suppliers will ensure any instances of workers being denied documents or assets are addressed, immediately returning documents or assets to workers and providing for worker safekeeping. Workers must not be required to pay suppliers', employers', agents', or sub-agents' recruitment fees or other related fees for their employment. Suppliers must maintain adequate controls to ensure that workers have not been charged recruitment or placement fees during their recruitment process and Suppliers are responsible to repay any such fees charged to workers. Additional requirements specific to Student and Dispatch Workers in China and to Foreign Migrant Workers are contained in [Hewlett Packard Enterprise's Student and Dispatch Worker Standard for Supplier Facilities in the People's Republic of China \(PRC\)](#) and [Hewlett Packard Enterprise's Supply Chain Migrant Worker Standard](#).

### 2. Young Workers

Child labor is not to be used in any stage of manufacturing or in the provision of services or supplies, nor should children be permitted in manufacturing areas. The term "child" refers to any person under the age of 15, or under the age for completing compulsory education, or under the minimum age for employment in the country, whichever is greatest. Suppliers must implement an appropriate mechanism to verify the age of workers. The use of legitimate workplace learning programs, which comply with all laws and regulations, is supported. Workers under the age of 18 ("young workers") must not perform work that is likely to jeopardize their health or safety, including night shifts, overtime, hazardous work, or work that may compromise their social development. Suppliers must ensure proper management of student workers through proper maintenance of student records, rigorous due diligence of educational partners, and protection of students' rights in accordance with applicable laws and regulations. Suppliers must provide appropriate support and training to all student workers. In the absence of local law, the wage rate for student workers, interns, and apprentices must be at least the same wage rate as other entry-level workers performing equal or similar tasks. If child labor is identified, assistance/remediation is provided, including immediate support to transport the child safely to their parent or guardian, support for continuing education, and financial support.

<sup>2</sup> Covering the fundamental rights related to preventing and addressing forced labor, supporting freedom of association (including right to organize and collective bargaining), antidiscrimination, and preventing and remediating child labor. Available at [ilo.org/global/standards/introduction-to-international-labour-standards/conventions-and-recommendations/lang--en/index.htm](https://ilo.org/global/standards/introduction-to-international-labour-standards/conventions-and-recommendations/lang--en/index.htm).

<sup>3</sup> Available at [ohchr.org/EN/ProfessionalInterest/Pages/CRC.aspx](https://ohchr.org/EN/ProfessionalInterest/Pages/CRC.aspx).



### 3. Working Hours

Studies of business practices clearly link worker strain to reduced productivity, increased turnover and increased injury and illness. Working hours are not to exceed the maximum set by local law. Further, a workweek should not be more than 60 hours per week, including overtime, except in emergency or unusual situations. Suppliers should not schedule workers for more than 48 hours in a regular workweek. All overtime must be voluntary. Workers must be provided sufficient rest including breaks, rest between shifts, holiday, and allowed at least one day off every seven days.

### 4. Wages and Benefits

Compensation paid to workers must comply with all applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits. All workers must receive equal pay for equal work and qualification. Workers must be compensated for overtime at pay rates greater than regular hourly rates, and this overtime pay must be paid in compliance with local law. Deductions from wages as a disciplinary measure must not be permitted. For each pay period, workers must be paid on time, in currency that is local or accessible by workers, provided with a timely and understandable wage statement that includes sufficient information to verify accurate compensation for work performed. All use of temporary, dispatch, and outsourced labor will be within the limits of the local law. Suppliers should limit use of temporary workers to 20% of the workforce.

### 5. Non-Discrimination/Non-Harassment/Humane Treatment

Supplier companies must commit to a workplace free of harassment and unlawful discrimination. There must be no harsh or inhumane treatment including violence, gender-based violence, sexual harassment, sexual abuse, corporal punishment, mental or physical coercion, bullying, public shaming, or verbal abuse of workers; nor is there to be the threat of any such treatment. Companies must not engage in discrimination or harassment based on race, color, age, gender, sexual orientation, gender identity or expression, ethnicity or national origin, disability, pregnancy, religion, political affiliation, union membership, covered veteran status, protected genetic information or marital status in hiring and employment practices such as wages, promotions, rewards, and access to training. Disciplinary policies and procedures in support of these requirements must be clearly defined and communicated to workers. Workers must be provided with reasonable accommodation for religious practices and disability. In addition, workers or potential workers should not be subjected to medical tests, including pregnancy or virginity tests, or physical exams that could be used in a discriminatory way.

### 6. Freedom of Association and Collective Bargaining

Open communication and direct engagement between workers and management are the most effective ways to resolve workplace and compensation issues. Workers and/or their representatives must be able to openly communicate and share ideas and concerns with management regarding working conditions and management practices without fear of discrimination, reprisal, intimidation, or harassment. In alignment with these principles, supplier companies must respect the right of all workers to form and join trade unions of their own choosing, to bargain collectively, and to engage in peaceful assembly as well as respect the right of workers to refrain from such activities. Where the right of freedom of association and collective bargaining is restricted by applicable laws and regulations, workers must be allowed to elect and join alternate lawful forms of worker representations.

## B. Health and Safety

Hewlett Packard Enterprise recognizes that in addition to minimizing the incidence of work-related injury and illness, a safe and healthy work environment enhances the quality of products and services, consistency of production, and worker retention and morale. Hewlett Packard Enterprise also recognizes that ongoing worker input and education are essential to identifying and solving health and safety issues in the workplace. Where the HPE Code and national or local laws regulating health and safety have requirements for the same subject matter, Suppliers must meet the more stringent requirements.

The health and safety standards are:

### 1. Occupational Health and Safety

Worker potential for exposure to health and safety hazards (chemical, electrical and other energy sources, fire, vehicles, and fall hazards, etc.) are to be identified, risk assessed, and mitigated using the Hierarchy of Controls, which includes eliminating the hazard, substituting processes or materials, controlling through proper design, implementing engineering and administrative controls, preventative maintenance and safe work procedures (including lockout/ tagout), and providing ongoing occupational health and safety training. Where hazards cannot be adequately controlled by these means, workers are to be provided with appropriate, well-maintained, personal protective equipment and educational materials about risks to them associated with these hazards. Workers must be encouraged to raise safety concerns.

Gender-responsive measures must be taken, such as taking reasonable steps to ensure that pregnant women and nursing mothers are not exposed to working conditions with high hazards, removing or reducing any workplace health and safety risks, and providing reasonable accommodations for nursing mothers.



## 2. Emergency Preparedness

Potential emergency situations and events are to be identified and assessed, and their impact minimized by implementing emergency plans and response procedures, including: emergency reporting, employee notification and evacuation procedures, worker training, and drills.

Emergency drills must be executed at least annually or as required by local law, whichever is more stringent. Emergency plans should also include appropriate fire detection and suppression equipment, clear and unobstructed egress, adequate exit facilities, contact information for emergency responders, and recovery plans. Such plans and procedures must focus on minimizing harm to life, the environment, and property.

## 3. Occupational Injury and Illness

Procedures and systems are to be in place to prevent, manage, track, and report occupational injury and illness, including provisions to: a) encourage worker reporting; b) classify and record injury and illness cases; c) provide necessary medical treatment; d) investigate cases and implement corrective actions to eliminate their causes; and e) facilitate the return of workers to work. Supplier companies must allow workers to remove themselves from imminent harm, and not return until the situation is mitigated, without fear of retaliation.

## 4. Industrial Hygiene

Worker exposure to chemical, biological and physical agents is to be identified, evaluated, and controlled according to the Hierarchy of Controls. If any potential hazards are identified, Supplier companies must look for opportunities to eliminate and/or reduce the potential hazards. If elimination or reduction of the hazards is not feasible, potential hazards are to be controlled through proper design, engineering, and administrative controls. When hazards cannot be adequately controlled by such means, workers are to be provided with and use appropriate, well-maintained, personal protective equipment programs free of charge.

Suppliers must provide occupational health monitoring to routinely evaluate if workers' health is being harmed from occupational exposures. Suppliers must provide protective programs, which must be ongoing and include educational materials about the risks associated with these hazards. Suppliers must also meet the requirements restricting substances in products as well as those used during manufacturing processes in the [Hewlett Packard Enterprise General Specification for the Environment](#).

## 5. Physically Demanding Work

Worker exposure to the hazards of physically demanding tasks, including manual material handling and heavy or repetitive lifting, prolonged standing, and highly repetitive or forceful assembly tasks is to be identified, evaluated, and controlled.

## 6. Machine Safeguarding

Production and other machinery must be evaluated for safety hazards. Physical guards, interlocks, and barriers are to be provided and properly maintained where machinery presents an injury hazard to workers.

## 7. Sanitation, Food, and Housing

Workers are to be provided with ready access to clean toilet facilities, potable water and sanitary food preparation, storage, and eating facilities. Worker dormitories provided by the Supplier or a labor agent are to be maintained to be clean and safe, and provided with appropriate emergency egress, hot water for bathing and showering, adequate lighting, heat, ventilation, individually secured accommodations for storing personal and valuable items, and reasonable personal space along with reasonable entry and exit privileges.

## 8. Health and Safety Communication

Suppliers must provide workers with appropriate workplace health and safety information and training in the primary language of the worker or in a language the worker can understand for all identified workplace hazards that workers are exposed to, including but not limited to mechanical, electrical, chemical, fire, and physical hazards. Health and safety related information must be clearly posted in the facility or placed in a location identifiable and accessible by workers. Training is provided to all workers prior to the beginning of work and regularly thereafter. Workers must be encouraged to raise any health and safety concerns without retaliation.



## C. Environment

Hewlett Packard Enterprise recognizes that social and environmental responsibility is integral to producing and providing world class products and services. Supplier must identify the environmental impacts and minimize adverse effects on the community, environment, and natural resources within their manufacturing operations, while safeguarding the health and safety of workers and the public.

The environmental standards are:

### 1. Environmental Permits and Reporting

All required environmental permits (e.g., discharge monitoring), approvals, and registrations are to be obtained, maintained, and kept current and their operational and reporting requirements are to be followed.

### 2. Pollution Prevention and Resource Conservation

Emissions and discharges of pollutants and generation of waste of all types, including water and energy, are to be minimized or eliminated at the source or by practices such as adding pollution control equipment; modifying production, maintenance, and facility processes; or by other means. The use of natural resources, including water, fossil fuels, minerals, and virgin forest products, is to be conserved by practices such as modifying production, maintenance and facility processes, materials substitution, re-use, conservation, recycling, or other means.

### 3. Hazardous Substances

Chemical, waste, and other materials posing a hazard to humans or the environment are to be identified, labeled, and managed to ensure their safe handling, movement, storage, use, recycling or reuse, and disposal. Hazardous waste data must be tracked and documented, in accordance with relevant international, national and local laws.

### 4. Solid Waste

Supplier must implement a systematic approach to identify, manage, reduce, and responsibly dispose of or recycle solid waste (non-hazardous). Solid waste generated from operations, industrial processes, and sanitation facilities are to be characterized, monitored, controlled, and treated as required prior to disposal. Waste data must be tracked and documented, in accordance with relevant international, national and local laws.

### 5. Air Emissions

Air emissions of volatile organic chemicals, aerosols, corrosives, particulates, ozone depleting substances, and combustion byproducts generated from operations are to be characterized, routinely monitored, controlled, and treated as required prior to discharge. Ozone-depleting substances are to be effectively managed in accordance with the Montreal Protocol and applicable regulations. Supplier must conduct routine monitoring of the performance of its air emission control systems.

### 6. Materials Restrictions

Suppliers are to adhere to all applicable laws, regulations, and Hewlett Packard Enterprise requirements regarding the prohibition or restriction of specific substances in products and manufacturing, including labeling for recycling and disposal.

### 7. Water Management

Supplier must implement a water management program that documents, characterizes, and monitors water sources, use and discharge; seeks opportunities to conserve water; and controls channels of contamination. All wastewater is to be characterized, monitored, controlled, and treated as required by law prior to discharge or disposal. Supplier must conduct routine monitoring of the performance of its wastewater treatment and containment systems to ensure optimal performance and regulatory compliance. Supplier must implement a systematic approach to prevent contamination of storm water runoff.

### 8. Energy Consumption and Greenhouse Gas Emissions

Suppliers are to establish a corporate-wide greenhouse gas reduction goal. Energy consumption and all Scopes 1, 2, and significant categories of Scope 3 greenhouse gas emissions are to be tracked, documented, and publicly reported against the greenhouse gas reduction goal. Suppliers are to look for methods to improve energy efficiency in their operations and to minimize their energy consumption and greenhouse gas emissions.



## D. Ethics

Hewlett Packard Enterprise requires its Suppliers, their sub-tier suppliers, and any other third-party agents to uphold the highest standards of ethics in their business operations.

The ethics standards are:

### 1. Business Integrity

The highest standards of integrity are to be upheld in all business interactions. Suppliers must 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 must 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. Suppliers should conduct appropriate risk-based diligence prior to engaging contractors or third parties to ensure that such third parties comply with the HPE 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.

### 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, record keeping, and enforcement procedures must be implemented to ensure compliance with anti-corruption laws.

### 3. Disclosure of Information

All business dealings should be transparently performed and accurately reflected on the Supplier's business books and records. Information regarding Supplier's labor, health and safety, environmental practices, business activities, structure, financial situation, and performance is to be disclosed in accordance with applicable laws, regulations, and prevailing industry practices. Falsification of records and / or misrepresentation of conditions or practices in the supply chain are unacceptable.

### 4. Intellectual Property

Intellectual property rights are to be respected; transfer of technology and know-how is to be done in a manner that protects intellectual property rights; and customer and supplier information is to be safeguarded.

### 5. Fair Business, Advertising and Competition

Standards of fair business, advertising and competition are to be upheld. Appropriate means to safeguard customer information must be available and used.

### 6. Protection of Identity and Non-Retaliation

Programs that ensure the confidentiality, anonymity and protection of Supplier and employee whistleblowers<sup>4</sup> are to be maintained, unless prohibited by law. Suppliers should have a communicated process for their personnel and workers to be able to raise any concerns without fear of retaliation.

### 7. Responsible Sourcing of Minerals<sup>5</sup>

Suppliers must adopt a policy and exercise due diligence on the source and chain of custody of the tantalum, tin, tungsten, gold ("3TG") and cobalt in the products, parts, components, and materials they manufacture to reasonably assure that they are sourced in a way consistent with the Organisation for Economic Co-operation and Development (OECD) Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas ("OECD Guidance") or an equivalent and recognized due diligence framework. Suppliers should provide a CMRT or EMRT to HPE as requested, and aim to provide this reporting at product level. Suppliers are also required to inform HPE immediately if they identify certain high risks included in Annex II of the OECD Guidance (including, but not limited to conflict or human rights risks associated with 3TG and cobalt) and share plans to remove smelters or refiners as requested by HPE, due to human rights concerns including forced labor.

### 8. Privacy

Suppliers are committed to protecting the reasonable privacy expectations of personal information of everyone they do business with, including suppliers, customers, consumers, and employees. Suppliers are to comply with privacy and information security laws and regulatory requirements when personal information is collected, stored, processed, transmitted, and shared.

<sup>4</sup> Whistleblower definition: Any person who makes a disclosure about improper conduct by an employee or officer of a company, or by a public official or official body.

<sup>5</sup> Suppliers must comply with the requirements set forth in [HPE's Supply Chain Social and Environmental Responsibility Policy](#) and [General Specification for the Environment](#), including with respect to responsible minerals.



## E. Management System

Suppliers must adopt or establish a management system with a scope that is related to the content of this Code. The management system must be designed to ensure: (a) compliance with applicable laws, regulations and customer requirements related to the Supplier's operations, products and/or services; (b) conformance with this Code; and (c) identification and mitigation of risks related to this Code. It should also be designed to facilitate continual improvement in the business's social and environmental performance.

The management system should contain the following elements:

### 1. Company Commitment

Corporate social and environmental responsibility policy statements affirming Supplier's commitment to compliance and continual improvement, endorsed by executive management, and posted in the Supplier's facility (where applicable) in the local language.

### 2. Management Accountability and Responsibility

The Supplier clearly identifies senior executive and company representative(s) responsible for ensuring implementation of the management systems and associated programs. Senior management reviews the status of the management systems on a regular basis.

### 3. Legal and Customer Requirements

A process to identify, monitor and understand applicable laws, regulations, and customer requirements, including the requirements of the HPE Code.

### 4. Risk Assessment and Risk Management

A process to identify the legal compliance, environmental, health and safety<sup>6</sup> and labor practice and ethics risks associated with Supplier's operations. Determination of the relative significance for each risk and implementation of appropriate procedural and physical controls to control the identified risks and ensure regulatory compliance.

### 5. Improvement Objectives

Written performance objectives, targets and implementation plans to improve the Supplier's social, environmental, and health and safety performance, including a periodic assessment of Supplier's performance in achieving those objectives.

### 6. Training

Programs for training managers and workers to implement Supplier's policies, procedures, and improvement objectives and to meet applicable legal and regulatory requirements.

### 7. Communication

Process for communicating clear and accurate information about Supplier's policies, practices, expectations and performance to workers, suppliers, and customers.

### 8. Worker /Stakeholder Engagement and Access to Remediation

Worker-management dialogue empowers workers to influence their own labor conditions. Suppliers should seek to continuously improve worker voice mechanisms, giving workers more ways to provide feedback and learn important professional and personal skills. Ongoing processes, including an effective grievance mechanism, to assess workers' understanding of and obtain feedback on or violations against practices and conditions covered by this Code and to foster continuous improvement. Workers must be given a safe environment to provide grievance and feedback, in their language, and without fear of reprisal or retaliation. Suppliers must also share and uphold HPE's commitment to respect the rights of human rights defenders, and allow them to exercise their rights to freedom of expression without threats, intimidation, or attacks. Suppliers must provide or cooperate in remediation for workers or other affected individuals, where it has caused or contributed to adverse impacts. Suppliers will engage workers or other affected individuals to ensure effective and complete remedy. HPE works with suppliers, providing guidance and support where linked to HPE business.

### 9. Audits and Assessments

Periodic self-evaluations to ensure conformity to legal and regulatory requirements, the content of this Code and customer contractual requirements related to social and environmental responsibility.

<sup>6</sup> Areas to be included in a risk assessment for environmental health and safety are production areas, warehouse and storage facilities, plant/facilities support equipment, laboratories and test areas, sanitation facilities (bathrooms), kitchen/cafeteria and worker housing/dormitories.



## Legal and regulatory

### 10. Corrective Action Process

Process for timely correction of deficiencies identified by internal or external assessments, inspections, investigations, and reviews.

### 11. Documentation and Records

Processes and controls to ensure accurate books and records, and creation and maintenance of documents and records to ensure regulatory compliance and conformity to company requirements along with appropriate confidentiality to protect privacy.

### 12. Supplier Responsibility

Process to communicate the HPE Code requirements to next-tier suppliers and to monitor compliance to this Code.

## References

The following standards were used in preparing this Code and may be useful sources of additional information.

[Dodd-Frank Wall Street Reform and Consumer Protection Act](#)

[Eco Management & Audit System](#)

[Ethical Trading Initiative](#)

[ILO occupational safety and health code and latest standards](#)

[ILO International Labor Standards](#)

[ISO 14001](#)

[ISO 45001](#)

[National Fire Protection Association](#)

[OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas](#)

[OECD Guidelines for Multinational Enterprises](#)

[SA8000](#)

[Social Accountability International \(SAI\)](#)

[Universal Declaration of Human Rights](#)

[United Nations Convention Against Corruption](#)

[United Nations Convention on the Rights of the Child](#)

[United Nations Convention on the Elimination of All Forms of Discrimination Against Women](#)

[United Nations Guiding Principles on Business and Human Rights](#)

[United Nations Global Compact](#)

[United States Federal Acquisition Regulation](#)

## Document History

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