

# 2025 Modern Slavery Transparency Statement

## April 2026 reporting for fiscal year ending October 31, 2025

Hewlett Packard Enterprise Company (“Hewlett Packard Enterprise” or “HPE”) is committed to combatting the risk of modern slavery and child labor in our global operations and supply chain. Transparency is a key part of this commitment and is essential to engaging companies, governments, investors, suppliers, recruitment agencies, workers, and other stakeholders in a broader dialogue on this important issue.

This statement is designed to meet Hewlett Packard Enterprise’s reporting obligations under the Australia Modern Slavery Act 2018, the UK Modern Slavery Act of 2015, the California Transparency in Supply Chains Act of 2010, and the Canada Fighting Against Forced Labour and Child Labour in Supply Chains Act. HPE provides this joint statement for itself and on behalf of certain foreign subsidiaries that are directly covered by a disclosure obligation in their respective jurisdictions. Currently this includes Hewlett-Packard Limited and Juniper Networks (UK) Limited,<sup>1</sup> pursuant to the UK Modern Slavery Act of 2015; Hewlett-Packard Australia Pty Ltd, Hewlett-Packard South Pacific Pty Ltd, HPE Financial Services (Australia) Pty Ltd, and Juniper Networks Australia Pty Ltd,<sup>2</sup> pursuant to the Australia Modern Slavery Act 2018;<sup>3</sup> and Hewlett Packard Enterprise Canada Co., Hewlett-Packard Financial Services Canada Company, and Juniper Networks Canada Inc.,<sup>4</sup> pursuant to the Canada Fighting Against Forced Labour and Child Labour in Supply Chains Act. HPE and its consolidated subsidiaries share the same core business operations and supply chains as well as the same modern slavery program, policies, processes, and risks further described in this statement, and as a result, this report covers the reporting obligations from a global perspective. The global team works to identify risks within HPE and our supply chains at global, regional and local levels. For further information, please refer to the [HPE Global Human Rights Policy](#) and [HPE Human Rights Report](#).

This statement is published on HPE’s website, available [here](#).

This statement covers the steps taken by HPE to prevent and reduce risks of forced labor and child labor during the financial year ending October 31, 2025, and describes foundational work undertaken in previous years where relevant to the description of these activities. On July 2, 2025, HPE finalized the acquisition of Juniper Networks (“Juniper”). Since then, HPE’s has been integrating Juniper into its global modern slavery program. Accordingly, this Statement reflects a consolidated approach for the period July 2, 2025, to October 31, 2025.

We are incredibly proud of our leadership in the fight against modern slavery. HPE earned the second highest ranking among 45 of the largest global information communications and technology (“ICT”)

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<sup>1</sup> Hewlett-Packard Limited is a private limited company incorporated under the laws of England & Wales with company number 00690597 and its registered office at Ground Floor, 210 Wharfedale Road, Winnersh Triangle, Berkshire, RG415TP, United Kingdom. Juniper Networks (UK) Limited is a private limited company incorporated under the laws of England & Wales with company number 03845874 and its registered office C/O Rourke House Watermans Business Park, The Causeway, Staines, United Kingdom, TW18 3BA.

<sup>2</sup> Hewlett-Packard Australia Pty Ltd, Hewlett-Packard South Pacific Pty Ltd, HPE Financial Services (Australia) Pty Ltd, and Juniper Networks Australia Pty Ltd are based in Australia and were formed under the laws of Australia. To prepare this joint statement, the Australian reporting entities were consulted on the statement and received an overview of how HPE’s global modern slavery program was implemented during the relevant reporting year.

<sup>3</sup> This statement meets the requirements for approval and signature under Australia Modern Slavery Act 2018. This statement was approved by the board of HPE in their capacity as the principal governing body (the “higher entity”) on April 2, 2026 and signed by an HPE board member.

<sup>4</sup> Hewlett Packard Enterprise Canada Co., BN 763966090, Registered Office: Halifax, Nova Scotia; Hewlett-Packard Financial Services Canada Company., BN 869440099, Registered Office: Halifax, Nova Scotia; Juniper Networks Canada Inc., BN 866995574, Registered Office: Saint John, New Brunswick.

companies, on [KnowTheChain's 2025 ICT Benchmark](#) and the top ranking in the IT Software and Services industry category of the [2026 Corporate Human Rights Benchmark](#).

Our Chief Executive Officer and Board of Directors, as well as the Nominating and Governance Committee of the Board, oversee environmental, social, and governance issues and are committed to operating HPE in a responsible manner. The Nominating and Governance Committee guides HPE's social and environmental activities, providing strategic direction on policies and programs related to human rights. The Nominating and Governance Committee's strategic review also considers how risks and responses align within the company's business model and overall purpose to advance the way people live and work. The Board of Directors approves this annual company-wide modern slavery statement.

Our approach and activities to address modern slavery are driven by the global Social and Environmental Responsibility ("SER") team in the Ethics and Compliance Office, which resides within Operations, Legal and Administrative Affairs. This team of four, led by our Director of Global Human Rights, reports to our Vice President of Anti-Corruption, Compliance & Social and Environmental Responsibility, who is accountable to our Chief Ethics and Compliance Officer. The SER team works in partnership with social and environmental colleagues on HPE's Global Strategic Sourcing team and Corporate Affairs team to action our policies and commitments relating to the United Nations Guiding Principles on Business and Human Rights ("UNGPs") and the principles set forth in the eight International Labour Organization ("ILO") core conventions. The SER team provides support, guidance, and resources to our partners in global sourcing teams, and partners with members of local legal teams, operations, and sales teams, and in consultation with the boards of our subsidiary entities, as appropriate, to develop, adopt, and approve statements that are responsive to local requirements.

Based on our most recent company-wide human rights impact assessment, modern slavery continues to be one of HPE's most salient human rights risks.<sup>5</sup> 2021 figures published by the ILO, International Organization of Migration ("IOM"), and Walk Free suggest the global estimate of people in modern slavery has increased to 49.6 million people, of which forced labor<sup>6</sup> accounts for 27.6 million.<sup>7</sup>

HPE has committed to respect human rights in alignment with the UNGPs and the principles set forth in the ILO core conventions (covering the [ILO Declaration on Fundamental Principles and Rights at Work](#), including the Forced Labor Convention, 1930 (No. 29) and the Abolition of Forced Labour Convention, 1975 (No 105)). Other influential international initiatives, such as the Organisation for Economic Co-operation and Development ("OECD") Guidelines for Multinational Enterprises on Responsible Business Conduct, the UN International Covenant on Economic, Social and Cultural Rights, and the UN International Covenant on Civil and Political Rights, inform our approach.

Driven by our culture and what defines us as a company – how we act, how we treat others, and how we conduct business – we believe a future without modern slavery is possible and we are determined to do our part to get there. We re-examine and refine our program each year considering our experience and emerging best practices.

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<sup>5</sup> International Labour Organization ("ILO"). (n.d.). What are forced labour, modern slavery, and human trafficking? Retrieved February 26, 2026, from <https://www.ilo.org/topics/forced-labour-modern-slavery-and-trafficking-persons/what-forced-labour>; and Decent work. Retrieved February 26, 2026, from <https://www.ilo.org/topics/decent-work>.

<sup>6</sup> HPE recognizes that modern slavery can take many forms, including forced labor, child labor, bonded labor, and human trafficking. For the avoidance of doubt, HPE defines "modern slavery" to include forced labor, including child labor. HPE uses the ILO's definitions of forced labor, child labor, bonded labor and human trafficking in its policies and programs. The terms "forced labor," "child labor", "bonded labor", or "human trafficking" in addition to "slavery" or "modern slavery" used in this statement are used in the same manner as in HPE's policies and programs.

<sup>7</sup> ILO, IOM and Walk Free. (2022). Global Estimates of Modern Slavery: Forced Labour and Forced Marriage. Retrieved February 26, 2026, from <https://www.ilo.org/publications/global-estimates-modern-slavery-forced-labour-and-forced-marriage-executive>.

## Business structure/supply chain overview

Hewlett Packard Enterprise is a leader in essential enterprise technology, bringing together the power of AI, cloud, and networking to help organizations achieve more. HPE customers include small-and-medium-sized businesses, large global enterprises, and government and public sector entities. Our products and services are available worldwide.<sup>8</sup> HPE is a corporation incorporated in Delaware, with its global headquarters in Houston, Texas, with approximately 67,000 employees. The company and its subsidiaries operate worldwide and are collectively known as HPE. A list of HPE's principal subsidiaries can be found in Exhibit 21 of HPE's most recent [SEC Form 10-K annual report](#).

The SER team is responsible for establishing and managing the policies, processes, and programs governing HPE's approach to human rights and ethical conduct in the supply chain. The SER team works closely with dedicated individuals in the product supply chain, indirect procurement, corporate affairs, human resources, and other internal organizations to implement and manage these policies, processes, and programs across HPE's operations and supply chain.

HPE sources its products and services from a worldwide network of suppliers. Since 2007,<sup>9</sup> we have disclosed a [list of our production suppliers](#). Since 2013, we also have disclosed a list of smelters, refiners, recyclers, and scrap processors for "Conflict Minerals", which includes tin, tungsten, tantalum, and gold that our direct suppliers have reported to us as potentially being in their supply chains. For more information, see the [HPE Conflict Minerals Report](#) and [HPE Living Progress Report](#) (including the Living Progress Data Summary, which sets forth key performance indicators).

Many of HPE's suppliers are large companies themselves and have a global network of supplier facilities from which HPE products are manufactured and distributed. Depending on product needs and operations, the individual facilities supplying HPE can change. On average, however, approximately 80% of HPE's direct supplier facilities are in Asia with the remaining 20% located across Europe and the Americas.

## Risks of Modern Slavery

Through research, on-site due diligence, and engagement with supplier facilities and industry groups, HPE has identified the following salient risks in its supply chain: the risk of forced labor with internal migrants in India and foreign migrant workers in certain high-risk countries in Asia (such as Malaysia, Taiwan, Singapore, and India). Forced labor risks can increase when facilities are dependent on recruitment agents or temporary workers. To manage these risks, we review supplier practices for managing agents and contractors in sending and receiving countries and require suppliers to limit dependence on temporary workers. Our risks are correlated to countries where local laws and practice are less protective and often align to suppliers who are new to our program, e.g., because they are new to HPE. Certain types of products and services and sub-tier operations, e.g., in the production of memory parts, cables and connectors and resistors deeper in our supply chain, may also be associated with greater risks. In 2025, we commissioned independent forced labor risk assessments in areas we deemed to be high risk, in order to more effectively detect and address any findings.

In our indirect supply chain, factors that may indicate higher risk include low-skilled labor, dependency on temporary or migrant workers, and specific types of services such as facility management, security, and construction. In 2024, we introduced more robust and formalized monitoring for some of these potentially higher risk indirect suppliers.

As outlined in [HPE Supply Chain Responsibility: Our Approach](#), HPE takes a systematic approach to sensing, understanding, and addressing risk. We engage with a broad range of stakeholders to research and better understand issues of concern regarding social and environmental responsibility in our supply chain, including geographic risks, labor trends, and environmental risks. These stakeholders

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<sup>8</sup> See further information on HPE's Products and Services at its website, available from <https://hpe.com/uk/en/home.html>.

<sup>9</sup> On November 1, 2015, Hewlett Packard Enterprise became an independent publicly traded company following the separation of Hewlett-Packard Company into two corporate entities. To avoid confusion, HPE, as used throughout this report, refers both to pre-separation Hewlett-Packard Company, as well as HPE.

include randomly selected workers and workers affected by poor labor conditions (through interviews, surveys, capability building programs, and our ethics concerns reporting system), industry groups, suppliers, governments, socially responsible investors, non-governmental organizations (“NGOs”), and human rights groups, such as the [Leadership Group on Responsible Recruitment \(“LGRR”\)](#), the [RBA](#), the [Business Roundtable on AI and Human Rights](#), the [World Economic Forum \(“WEF”\)](#), the [Business Network on Civic Freedoms and Human Rights Defenders](#), the [Responsible Minerals Initiative \(“RMI”\)](#), the [Responsible Labor Initiative \(“RLI”\)](#), and the [UN B-Tech Community of Practice](#). Stakeholder engagement is a critical step toward a coordinated and effective response to important social and environmental challenges.

## Policies

Hewlett Packard Enterprise believes that all people should be treated with dignity and respect. HPE’s broad commitment to respect human rights is set out in our [Global Human Rights Policy](#), which is rooted in our commitment to respecting human rights in alignment with the UNGPs. The [HPE Standards of Business Conduct \(“SBC”\)](#) and U.S. Public Sector Anti-Human Trafficking Policy contain prohibitions on forced labor, child labor, bonded labor, and human trafficking – as well as conduct or any operations that can contribute to forced labor and human trafficking. Our modern slavery strategy guides our work on modern slavery, which we review annually, and update as required. We seek to engage all relevant stakeholders, including workers, in selecting our priorities, to enable HPE to focus on issues that will have the greatest overall impact.

The [HPE Migrant Worker Standard](#), published over a decade ago, reflects HPE’s early adoption of the “Employer Pays Principle” approach in our supply chain. Under this standard, migrant workers cannot be charged recruitment fees or costs and such workers’ original migrant worker identification documents, passports, travel papers, and other personal assets and documents may not be retained or held by suppliers, recruitment agents, or any third-party. We require our suppliers to directly employ foreign workers. All suppliers and supplier facilities globally that are involved in manufacturing HPE’s products, packaging, parts, components, subassemblies, and materials, or involved in processes related to that manufacturing, and all suppliers that provide services to or on behalf of HPE, are bound to adhere to the standard. The standard also establishes requirements for the use of employment contracts and recruitment, travel, and processing fee reimbursements.

In addition to the HPE Migrant Worker Standard, HPE’s external relationships (i.e., supplier and partner relationships) are governed by the [HPE Supplier Code of Conduct](#), which fully aligns with, and in some cases, extends beyond the [RBA Code of Conduct](#) (version 8.0, effective January 1, 2024). HPE’s other leading standards include the [HPE Student and Dispatch Worker Standard for Supplier Facilities in the People’s Republic of China \(PRC\)](#), [HPE Partner Code of Conduct](#), and HPE Contingent Worker Code of Conduct.

## Program Approach

Our Supply Chain Responsibility (“SCR”) program reflects years of research and engagement and incorporates our ongoing risk assessments. Those risk assessments have indicated, and continue to indicate, that the risks of forced labor and child labor are highest in our supply chain, specifically at the sites where our product components and sub-tier supplier parts are manufactured. Key risks at supplier sites include payment of recruitment fees charged by third-party recruitment agents, and lack of strong supplier management systems that would detect and prevent such fees. Our Supplier Code of Conduct has long prohibited forced and child labor. We require independent audits against our Supplier Code of Conduct for all suppliers in our SCR program (i.e. 98% spend suppliers and certain high-risk tier 2 suppliers), and our approach includes supplementing those audits with assessments on specific areas of risk, such as modern slavery. A non-conformance with our Supplier Code of Conduct (i.e., negative audit finding) does not necessarily mean a violation has been found. It could mean that there are insufficient management systems in place to prevent violations from occurring. We require our key suppliers in high-risk locations or suppliers that have had certain non-conformances to provide additional monthly reporting

on key performance indicators such as working hours, use and management of recruitment agencies, and the number of vulnerable workers. We encourage suppliers in HPE's SCR program to apply best practices and support them with training and guidance on specific issues, including combatting forced labor, child labor, bonded labor, and human trafficking. See *Supplier Verification: Auditing, Monitoring, and Remediation* section below for additional details.

We have taken targeted steps to enhance protection for particularly vulnerable groups that are at heightened risk of exploitation. Our differentiated approach focuses on addressing risks related to migrant workers worldwide, especially in high-risk Asian countries, and local workers in China and India. In both instances, our approach has been to:

- Map and identify the key risks related to how workers are recruited and employed;
- Collect and analyze data from audits or engage stakeholders to identify vulnerable groups;
- Develop specialized supplier standards, as referenced in the "Policies" section above – in addition to our Supplier Code of Conduct – to address key risk areas;
- Conduct supplier training and education on the standards and best practices for employing these workers;
- Develop specialized assessment tools or approaches – in addition to our standard social compliance audit;
- Collaborate with our suppliers, peers, competitors, and other stakeholders on best practices, raising industry standards, and disrupting the environment that allows for modern slavery to persist (e.g., RBA's Standard for the Investigation and Repayment of Fees to Workers); and
- Engage HPE leadership in promoting our standards and approach to modern slavery, including forced labor and child labor, both internally (e.g., awareness building and sponsorship for employee volunteer opportunities to support modern slavery initiatives) and externally worldwide.

Through progressive improvements over a period of years, we have built and maintained an approach that addresses not only our supply chain generally, but also these particularly vulnerable groups. We continue to work to refine our policies, actions, and disclosure. Most recently, we have focused on identifying sites with multiple risk factors related to vulnerability, to enable us to prioritize our specialized assessments and worker engagement.

Every year we review our approach to supply chain responsibility and evaluate its effectiveness, which includes incorporating new metrics, where appropriate, to measure and internally report our SER program's effectiveness. In 2025, we took several steps to advance our approach, including:

- Using the findings from our 2024 risk review – which included a deep dive of our data on forced labor risks and findings – to help guide programmatic decisions, including conducting more forced labor deep-dive assessments at supplier sites identified as high risk;
- Increasing our use of Verité's CUMULUS tool to assess supplier-site responsible recruitment practices and potential risks associated with recruitment agencies;
- Advancing our partnership with the World Economic Forum ("WEF") to help support the large-scale data sharing and use of technology in the fight against human trafficking<sup>10</sup>; and
- Expanding our programmatic reach with tier 2 and indirect suppliers, including collecting and analyzing forced labor risk data and working in partnership with direct suppliers to commission third-party forced labor risk assessments across highest risk tier 1, tier 2 and indirect suppliers.

For information on our supplier requirements and engagements, see the *Supplier Verification: Auditing, Monitoring, and Remediation* section below.

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<sup>10</sup> See [WEF Global Data Partnership Against Forced Labour](#).

# Accountability

## Employees

Uncompromising integrity is one of HPE's foundational values, and accountability is one of the leadership attributes expected of all employees. HPE has been named by the Ethisphere Institute as one of the "[World's Most Ethical Companies](#)" for eight years in a row (2019 through 2026) for exemplifying and advancing corporate citizenship, transparency and standards of integrity.

Hewlett Packard Enterprise requires all its employees to comply with our SBC, which notes that child, prison, or forced labor are never permitted. Our SBC training for all new employees includes content on broader human rights risks. HPE trains employees on the SBC annually and takes alleged violations of company policy seriously. We respond to allegations promptly and conduct investigations when appropriate. Violations of the SBC or other HPE policies may result in disciplinary action, up to and including termination.

Hewlett Packard Enterprise provides employees with multiple channels for reporting concerns about a potential violation of law or company policy. HPE also provides mechanisms for external parties to raise potential concerns, including those related to forced labor, child labor, bonded labor, and human trafficking. HPE's third party-managed hotline offers uninterrupted access, anonymity, and translation services to make it easy for any person, including suppliers' workers and those workers further down the supply chain, to raise a concern or complaint. We promote the hotline on our public-facing website, during interviews with workers, and in some instances, through informational posters placed in our facilities and offices where employees and workers may frequently view the information. The process and handling of concerns, referencing who handles complaints, and relevant timelines with respect to the hotline, are easily accessible and publicly available [online](#).

We promote our internal grievance mechanisms to manufacturing workers and onsite-services-provider workers and at select supplier sites.

For more information on HPE employee training, see *Training and Capability Building* below.

## Suppliers

Hewlett Packard Enterprise's supplier agreements require suppliers to comply with all applicable laws and regulations and include requirements relating to the [HPE Supplier Code of Conduct](#).

Through our Supplier Code of Conduct, HPE requires suppliers, at a minimum, to communicate the requirements of HPE's Supplier Code of Conduct to next-tier suppliers and to monitor those next-tier suppliers' conformance with the Supplier Code of Conduct requirements. We conduct annual or semi-annual calls with high-risk critical suppliers, to understand the challenges they face, in particular regarding forced labor risks in sub-tiers, and we offer resources and direct guidance. Conformance is evaluated through our comprehensive third-party audits (see *Supplier Verification: Auditing, Monitoring, and Remediation* below for more information on our audit program).

HPE's supply chain SER requirements, including those related to combatting forced labor, child labor, bonded labor, and human trafficking, are integrated into HPE's supplier performance management process. HPE sourcing teams communicate our SER requirements to their suppliers, score their performance, and communicate with suppliers about their conformance through regular supplier business reviews and day-to-day engagement. Our SER team partners engage day-to-day with our buying teams across the company on SER topics, concerns, and messaging; and regularly train our buying teams on our commitments, supplier requirements, responsible purchasing practices, and workers' feedback and risks related to topics such as forced labor and working hours. We rank levels of non-conformance to the HPE Supplier Code of Conduct according to the RBA grading system of 'minor', 'major', and 'priority', and apply an additional HPE-defined grade of 'critical' (as outlined in the [HPE Supply Chain Responsibility: Our Approach](#)). HPE requires suppliers to produce a corrective action plan for any issue of non-conformance, and a member of the SER team tracks each major, priority, or critical issue to closure.

We incorporate supplier performance in each supplier’s SER Scorecard. Our SER Scorecard – owned and communicated by our HPE sourcing teams and described in more detail in the [HPE Supply Chain Responsibility: Our Approach](#) – ties ongoing procurement decisions to supplier SER performance and participation in capability building. Suppliers with strong SER performance improve their opportunities for new or expanded business. Suppliers with poor SER performance risk a reduction in business. Inaction on non-conformance can also place a supplier at risk of business implications.

We value and nurture our relationships with our suppliers. Therefore, we place a high priority on communicating and working with suppliers to ensure the wellbeing of workers. When a supplier fails to adhere to HPE standards and policies, as an initial measure, we seek to work with the supplier to remediate and improve practices in an effort to ensure adoption of all HPE standards and policies. HPE aligns with the UNGPs, which guide companies to use their leverage to incentivize the partner to prevent, mitigate, or remediate any human rights impacts. In addition, we generally follow the UNGP approach that the prospect of disengagement can serve to create or increase leverage, but companies considering disengagement need to take into account factors such as the severity of the adverse impact. We recognize that walking away from a supplier can further harm labor conditions for workers. Accordingly, as a first step, we work with our key suppliers and partners to improve labor conditions, in the interest of workers. But persistent violations may result in action, up to and including termination of a business relationship.

HPE’s forced labor due diligence applies to several types of suppliers, including hardware and assembly; indirect suppliers; recycling and refurbishment; and logistics service providers. HPE has continued to expand its engagement with indirect suppliers by formally rolling out the SER program’s work to more of these suppliers, including more robust and regular monitoring.

## Due Diligence Processes to Assess and Manage Risk

### Risk Mapping in the Supply Chain

We work to identify emerging risks in our supply chain at global, regional, and local levels. We analyze information from our supplier monitoring program, worker engagement, extensive stakeholder network, and other external sources to look for, and address risks proactively:

- **Stakeholder engagement:** Hewlett Packard Enterprise engages with a broad range of stakeholders, including workers at HPE supplier facilities (through interviews, surveys, capability building programs, and channels for raising concerns), industry bodies, governments, and NGOs. This engagement allows us to research and better understand practices that can lead to modern slavery in the supply chain. For example, HPE is a member of several leading industry groups in the fight against modern slavery, including the RBA, the RLI, and the LGRR. We also engage directly and consult on specific topics such as key needs and how to improve our approach to forced labor due diligence with NGOs, including, but not limited to Verité, Global Migrant Workers Network, IOM, Institute for Human Rights and Business, and UNICEF. These relationships collectively help HPE to leverage shared resources, collaborate on new tools, share best practices, engage with external stakeholders, and advocate for higher cross-industry standards.
- **Supplier risk evaluation:** HPE evaluates suppliers to analyze the potential for practices that can lead to forms of modern slavery and other labor and environmental non-conformances. These evaluations include information from supplier self-assessment questionnaires (“SAQs”), on-site social compliance audits, Verité’s CUMULUS tool (reviewing supplier agreements and management systems in relation to how they work with all recruitment agencies in sending and receiving countries), engagement with and review of findings and recommendations from NGOs, and in-person specialized assessments (including information from worker interviews). We take particular care to analyze the following indicators: employment of vulnerable worker groups, the use of third-party agents in the recruitment or management of workers, and supplier operations in geographic areas with potential for elevated risks of forced labor. All suppliers who fall within 98% spend are included in our supply chain responsibility risk calculator (including some tier 2 suppliers). Our supplier risk calculator considers supplier, facility, product and country risk, and leverages external expert data including global data from multilateral organizations and the U.S.

State Department on child labor, wages, contracts, forced labor, worker rights, chemicals and climate.

- **External data:** We use information from a wide range of external sources to inform the design of our SCR program. These sources include research, reports, new and emerging human rights due diligence regulations, and indices from governments, NGOs, human rights experts, and reputable research institutions. We also monitor external sources for new resources as they become available.
- **Supply chain mapping:** We continuously map our supply chain to gain visibility of our key tier 1 and tier 2 suppliers and work to assess risks of forced labor in collaboration with them and their supply chains.

We use the information we obtain through our risk-sensing processes to inform our requirements, supplier monitoring (annual audit prioritization process), and other program activities, such as training, partnerships, capability building programs and specialized forced labor risk assessments.

We primarily focus our program engagement on those suppliers with which HPE has a direct contractual relationship, including final assembly suppliers, as well as strategic commodity suppliers. We typically work with these suppliers over several years, allowing them to gain insight into and develop an understanding of our standards and expectations. In 2024 and 2025, we worked with our major tier 1 suppliers to collaborate and assess risks with their suppliers, especially where we identify potential risk of forced labor and child labor. As noted above, we require our direct suppliers to communicate the requirements of HPE's Supplier Code of Conduct to the next tier of suppliers (in their supply chain) and to monitor those suppliers' conformance with these requirements.

### **Supplier Verification: Auditing, Monitoring, and Remediation**

We conduct verification of supplier conformance through multiple means. We use supplier SAQs, comprehensive audits, specialized assessments, and our key performance indicator program. We also promptly investigate any third-party or supply chain worker allegations related to forced labor or child labor. Our Ethics and Compliance Office aims to reply to any raised grievance within 24 hours, and we subsequently endeavor to escalate to leadership and to suppliers within a few days, to investigate the complaint within a few weeks, and from there, we proceed to correct practices and provide remedy in alignment with the RBA's robust timelines. We require workers to be consulted throughout the process to ensure improvements are having an impact and any new concerns can be safely raised. We update individuals who raise grievances and welcome more information and evidence.

Comprehensive, independent third-party audits evaluate supplier performance against our Supplier Code of Conduct, including the provisions on freely chosen employment. Most of these audits are conducted through the [RBA Validated Assessment Process \("VAP"\)](#). Where risk is identified, we supplement these audits with specialized assessments that target key risk areas, such as recruitment and employment practices for migrant workers. Within each of those audits and assessments, we identify potentially high-risk practices, as well as weak controls or systems to manage risks of forced labor, child labor, bonded labor, and human trafficking. In FY25, 188 site audits and assessments were conducted at supplier facilities<sup>11</sup>. (For more information on our audit program, please see [HPE Supply Chain Responsibility: Our Approach](#)).

As a matter of general practice, we announce audits in advance and conduct them in the presence of facility management, as doing so contributes to building and maintaining strong relationships and fostering supplier ownership of SER performance. However, we will – and have – conducted unannounced audits or offsite worker interviews when circumstances call for such an approach, such as if we have strong reason to believe workers may be coached.

A finding of non-conformance with HPE requirements does not necessarily indicate that forced or child labor is present but may indicate inadequate operating standards or procedures to prevent such an

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<sup>11</sup> Audits and assessments include RBA VAP audits, specialized assessments including investigations, onboarding assessments, and Verité's CUMULUS responsible recruitment assessments.

occurrence. In any event, in a case of non-conformance, a supplier is required to produce a corrective action plan to outline how it intends to resolve the issue. HPE then reviews the plan and approves or requires further refinement. A supplier must cease any practice that contributes to a critical labor issue and must promptly report its corrective actions to HPE for review and feedback. HPE or a third-party auditor will then re-examine the findings through a site visit to confirm resolution. For example, if a worker is found to have been charged recruitment or placement fees during their recruitment process, the supplier at issue will be required to repay any such fees charged to the worker and introduce effective management systems to prevent fees being charged.

In addition to audits and assessments, we develop practical resources (such as a tool for robust and worker-inclusive tracking of remediation), and when potentially helpful for other companies, donate them to RBA members. We also actively engage in the development and update of industry leading tools for addressing and preventing forced labor, such as RBA's Standard for the Investigation and Repayment of Fees. We require heightened engagement and consultation with workers to ensure plans are robust and followed through, and that the workers' well-being and safety is maintained throughout the remedy process. Audit and assessment data, as well as data on responsiveness to corrective action plans, are incorporated into the SER Scorecard (as explained above).

## Training and Capability Building

We structure our approach to training to better track and ensure all primary stakeholders receive regular, meaningful training. We categorize training by participant: HPE global sourcing teams (which helps to enforce our SER policies and standards), suppliers (e.g., multi-supplier facilitated training, direct 1:1 capability-building), and supply chain workers (building awareness of their rights and grievance channels).

### Internal

All HPE employees must complete annual SBC training, with new employees required to complete SBC training when joining HPE, which includes how to escalate or raise concerns without fear of retaliation. The SBC specifically notes that child, prison, or forced labor, and physical punishment are never permitted in any of HPE's operations, or those of our business partners or suppliers. The SBC requires, and associated annual training emphasizes, the importance of employees treating others with integrity, respect, and fairness.

HPE provides training to team members who source and manage relationships with our suppliers on key SCR issues and on effective management of suppliers' SCR performance. From time to time, we offer more targeted training for HPE employees on human trafficking awareness through various employee awareness and volunteering events. The purpose of internal modern slavery awareness training is to:

- emphasize why the employee should care about forced labor in their role at HPE;
- provide a definition of forced labor;
- dispel common myths about forced labor;
- highlight key HPE policies that prohibit forced labor;
- provide a list of red flags to look for in interactions with colleagues and business partners' employees;
- explain how an employee can act on concerns that they or someone else may be in a situation of forced labor; and
- highlight ways employees can volunteer to combat modern slavery in the communities where they live and work.

Modern slavery awareness training is open to all employees, in collaboration with organizations with whom we partner. This initiative encourages HPE employees to apply their professional skills and volunteer with organizations that work to combat modern slavery or support survivors of human trafficking.<sup>12</sup>

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<sup>12</sup> HPE provides matching for eligible financial contributions and credits for eligible volunteering activities.

For example, in FY24, the HPE Foundation, in partnership with The Anti-Slavery Collective and MIT Solve, launched a program to scale and support exceptional tech solutions developed for and by survivors of modern slavery, that leverage ethical technology – like AI – to improve and provide services to survivors. These organizations are deploying solutions, including safer recruitment channels, trauma recovery and access to justice.

In FY25, HPE data engineers donated their time and expertise to build agentic AI tools to help partners such as the WEF and the International Red Cross to combat forced labor more effectively.

In addition, we regularly train HPE buyers (e.g., managers in strategic sourcing) on key SER risks, including modern slavery and working hours, our approach to supply chain responsibility, and how buyers' purchasing practices can exacerbate or reduce risk of forced labor and child labor in our supply chain. We offer annual in-depth training for buying teams, coupled with quarterly refreshers, updates, and engagements. We work closely with buying teams, and with each critical finding, we facilitate 1:1 discussions with relevant internal sourcing managers to review and share best practices, and aim to leverage our experience to positively impact supplier SER performance.

## External

In 2011, Hewlett-Packard Company initiated a supplier training program on forced labor risks. Since then, we have held numerous focused training sessions designed to help suppliers understand HPE's expectations, as well as expanding on the various standards and requirements introduced by the RBA, governments, and other leading institutions. The training sessions are designed to provide suppliers with the tools, skills, and best practices needed to better implement the requirements outlined in the [HPE Supplier Code of Conduct](#), [HPE Migrant Worker Standard](#), and [HPE Student and Dispatch Worker Standard for Supplier Facilities in the People's Republic of China \(PRC\)](#). All suppliers that participate in capability-building activities receive additional points in their SER Scorecard. (See the *Accountability* section above for additional information on our SER Scorecard program).

External training and capability building activities in 2025 included:

— **Collaboration:** Since its inception as an independent company, HPE has partnered with other leading IT companies, including several of our competitors and suppliers, to conduct training sessions. By taking this collaborative approach, we reinforce our industry's commitment to this issue and deepen the reach of the program beyond our first-tier suppliers. We believe this better protects the rights and wellbeing of workers in our collective supply chains, reduces risks for our companies and for our suppliers, and will lead to better business outcomes. This year, we covered forced labor in great depth, through multiple live facilitated training sessions. In this type of training alone, we reached approximately 71% of suppliers in our program which covers suppliers who account for 98% of our supply chain spend (including some high-risk tier 2 suppliers). For example:

- In October 2025, we co-sponsored supplier-responsibility training in partnership with some of our suppliers and peers, including Intel Corporation, Western Digital Corporation, HP Inc., and Seagate Technology PLC. We worked with the RBA, who facilitated these live training sessions across multiple days for participants in Asia Pacific, Europe and North America. The facilitated training covered updates on the RBA risk and audit tools for indirect suppliers; forced labor risks; recruitment fee definitions; forced labor remediation; fee investigation challenges; emerging human rights regulations; grievance mechanisms; and an update on the RBA Responsible Factory Initiative. The training reached 214 representatives coming from more than 75 supplier companies and over 162 facilities throughout our extended, global value chain.
- We encouraged local suppliers to participate in other capability building opportunities as well, including a mandatory human rights due diligence session hosted by the RBA and the Thai Government, and RBA outreach meetings that covered a range of relevant topics.
- In September 2025, we paid for high-risk suppliers to attend in-person training in Taiwan and Malaysia, focused on forced labor.
- During 2025, we continued collaborating in RBA's Responsible Purchasing Practices Working Group, contributing to a best practice guide.

- Leveraging Existing Training Resources: HPE also encourages suppliers and other relevant personnel to take courses through the RBA’s eLearning Academy and RLI online training and directs suppliers to the appropriate tools and resources, as needed. Available courses through the RBA eLearning Academy include topics such as preventing forced labor during recruitment, recognizing forced labor, understanding specialized VAP assessments on forced labor; and forced labor due diligence. Since 2017, HPE has promoted training courses provided by RLI to suppliers and recruitment agents for additional training and guidance on industry standards.
- Best Practices: HPE actively collects and works to disseminate best practices and resources to all suppliers in our program.
- Worker Human Rights Training: Following its launch in early 2025, worker human rights training that we helped digitize (alongside peers and an industry membership group), was completed by 2,257 workers across 74 supplier sites in 2025.
- Tailored engagement: We provided direct support and continuous guidance for our suppliers with major, priority, and critical non-conformances. For example:
  - HPE engaged closely with suppliers who had priority and critical findings, speaking with them regularly to strengthen their understanding of root causes, planning appropriate and effective management systems, and their engagement with workers to roll out new practices that are robust, effective, and trusted by workers. We also regularly requested and reviewed, in detail, evidence of progress from suppliers.
  - HPE scheduled targeted semi-annual check-ins with certain suppliers to discuss in depth HPE’s SER priority areas (including preventing and addressing forced labor, extending our standards deeper in their supply chains, and worker voice).

We plan to continue to provide training in all categories, including training suppliers and recruitment agencies on forced and child labor; and rolling out, actively promoting and supporting new mobile-based human rights training to all suppliers and their workers.

At HPE, we do not believe that training alone is sufficient. To achieve change, we believe that HPE (along with others) should contribute to research on new initiatives, engage with governments and law enforcement, educate workers and amplify their voices, and share best practices with other companies and stakeholders. For example, during the reporting year:

- HPE worked through the RLI and with peers and suppliers to understand emerging forced labor risks across Asia, and best practices in assessing and preventing forced labor.
- HPE continued to actively participate in the RBA taskforce on living wages. We conducted living wage assessments at select indirect spend suppliers, where we learned the process and challenges of measuring living wage gaps. We shared results with our internal procurement teams and facilitated discussions about what is feasible due diligence in this area. The findings from our assessments and related discussions will inform our approach to encouraging living wages throughout our supply chain. HPE continued to engage and demonstrate our leadership in the Employer Pays Principle through active engagement with the LGRR and as Chair of the RLI. We continue to strive towards meeting our three social supply chain goals, one of which is directly focused on combatting forced labor: to achieve 100% of HPE suppliers committed to the Employer Pays Principle by 2030. The two additional goals focus on worker voice and agency, which we believe support prevention of forced labor.

In 2025, we worked with our suppliers to advance their performance against our social supply chain goals. As of January 2026, this is where HPE stands on its social supply chain goals (to achieve by 2030), with our suppliers<sup>13</sup>:

- **86%** of HPE suppliers committed to the Employer Pays Principle (2030 goal: 100%);<sup>14</sup>
- **83%** of HPE suppliers train their workers on human rights (2030 goal: 100%); and
- **86%** of HPE supplier sites have implemented effective grievance processes (2030 goal: 100%).

<sup>13</sup> From 2025, HPE has tracked our social supply chain goals based on an expanded HPE 98% spend, from 95% in prior years.

<sup>14</sup> The Employer Pays Principle is the idea that no worker should pay for a job. The costs of recruitment should be borne not by the worker but by the employer.

We continue to work with our suppliers and procurement teams to meet these goals, including by offering our advice and resources, and in the coming year will continue working with our smaller spend and new suppliers to build their capability to align with our goals and implement best practice.

## Program Effectiveness

Each year, we work to further mitigate the risks of forced labor, particularly in our supply chain. This includes undertaking a review of our supply chain standards, contributing to industry tools and guidance materials, tailoring supplier trainings to current risks, assessing risks, and publicly engaging on forced labor prevention.

We recognize that, similar to our experience in past years, as we continue our strategy to raise our requirements and implement deeper due diligence and monitoring efforts, we might uncover previously unidentified high-risk behaviors. We are committed to our strategy and to ongoing continuous improvement.

Since its inception as an independent company in November 2015, HPE has monitored risks related to the recruitment and employment of migrant workers at supplier sites. We also carry out research and engage key stakeholders to understand the challenges facing the most vulnerable groups in our supply chain to develop potential solutions to address these issues.

HPE is committed to ongoing continuous improvement in the identification of forced labor and child labor risks, including by training suppliers and sourcing teams to identify risks in our broader, collective supply chain, and having procedures in place to ensure that where identified, they are investigated, and corrective action and remediation steps are taken.<sup>15</sup>

Since HPE adopted the Employer Pays Principle in 2016, the cumulative total of recruitment fees reimbursed to workers in our supply chain as of end of 2025 was \$2.5 million.

We have developed our affected worker consultation process by seeking feedback for the purpose of informing our program priorities (which includes forced labor and child labor) and influencing best practice, such as guidance and requirements for suppliers. During our experience and through consultation with experts and rights-holders representing migrant worker rights, we found that engagement is more effective when worker interviews are conducted through third-party local experts, and as such we are seeking opportunities to improve our worker-led monitoring through partnership with local partners. We also require heightened engagement with workers when we identify and address critical issues in our supply chain, including but not limited to remedy procedures (see remedy requirements in the [HPE Migrant Worker Standard](#)). Worker feedback prompted our work with peers to develop worker human rights training and subsequently, our social goal on worker training.

HPE places a high degree of importance on addressing all findings relating to forced labor with our suppliers. For allegations of a critical non-conformance, HPE commissions an investigation as appropriate. HPE assigns a critical grade to a finding of non-conformance if it has the potential to cause a significant and immediate negative impact on people. Where critical forced labor instances arise, HPE follows its internal critical incident response process, which includes commissioning an onsite independent investigation (where needed), reviewing and approving suppliers' corrective action plans, updates on progress with evidence, worker reports, and ultimately an independent closure audit.

Any supplier with a critical finding receives a significant penalty in their SER Scorecard, which can impact the supplier's future business awards with HPE. HPE supplier performance managers operating within our purchasing teams communicate to suppliers the importance of adherence to HPE SER standards and policies as reflected in our SER Scorecards, and work closely to monitor the progress of identified corrective actions.

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<sup>15</sup> See HPE's Living Progress Report for details on HPE's most critical risks.

We take each finding relating to forced labor seriously and believe that uncovering these issues shows that our approach is working. In FY25, where we identified findings through our supply chain audits and specialized assessments, we worked quickly with the relevant suppliers to address them in accordance with our policies.

Based on our understanding of the root causes and enabling factors of these risks, we believe that collaborative action by the private sector, governments, enforcement officials, and civil society is essential to long-term and systemic success. We have worked on, and will continue to promote, this collaborative approach even as we individually seek to mitigate the frequency of these occurrences and strive to accurately identify and address these issues when they do occur.

We will continue to evaluate how to improve our program through training and supplier engagement to ensure that suppliers fully understand our requirements and are proactively working to ensure conformance with HPE requirements.

In FY25, HPE commissioned more specialized forced labor assessments. This included 16 forced labor site assessments and 20 Verité CUMULUS responsible recruitment assessments. We targeted sites with high-risk characteristics, as determined by our first forced labor risk review, conducted the previous year.

We began compiling and analyzing more forced labor data in FY25, including data on subtier suppliers and from additional specialized assessments. This second forced labor risk review (completed in FY26), continued to identify the highest risk of forced labor in Taiwan, Singapore, Malaysia, and India. As a result, we are planning practical workshops in these high-risk countries focusing specifically on how risks manifests locally.

Amongst the most prevalent forced labor-related findings in our supply chain based on our FY25 assessments were inadequate supplier policies and procedures, and inadequate worker contracts. While recruitment fee findings were less prevalent, the risk of recruitment fees was identified as high. We continue to work with our suppliers to advance their practices in line with our social goals, including the goal for 100% of suppliers committing to the Employer Pays Principle.

As noted in the section above, this year we targeted several capability-building efforts to meet the needs and issues we had identified.

Based on the improvements we saw because of these efforts, we continue to believe that education and guidance remain extremely important elements of any program to mitigate the risks of modern slavery. We also believe in establishing a dialogue with suppliers to identify root causes, amplify worker voice, and secure commitments to maintaining such a program.

We track and measure multiple indicators of the effectiveness of our program on an ongoing basis, this includes:

- Tracking the effectiveness of our work with suppliers to prevent forced labor: HPE set public social goals for our supply chain that we hold our suppliers and ourselves accountable to. Since FY23, we have published our progress against these goals, which include suppliers establishing robust policies to prevent fees, training workers on their rights, and providing effective grievance mechanisms.
- % of Correction Action Plans (CAPs) reviewed and approved: Following each audit with major, priority or critical findings, we request the supplier to share a detailed assessment of root cause and corrective actions for each non-conformance within 30 days of receipt of the audit. We assess the strength and relevance of CAPs, provide input/feedback, and approve the CAP once it meets our expectations.
- % of fees reimbursed: We work closely with suppliers and workers where recruitment fees are identified. We track all recruitment fees paid by workers, requiring and achieving to date, full reimbursement of fees to those workers.
- Tracking and reporting on supplier scorecard performance: We use HPE supplier scorecards to measure the effectiveness of our efforts to drive supplier improvements. These scorecards are used to measure range of criteria relating to supplier engagement and supplier facility performance.

## Public Advocacy and Collective Action

Hewlett Packard Enterprise views engagement with stakeholders and public advocacy as integral aspects of our overall strategy to address the risks of modern slavery, particularly in the supply chain.

We often share our experiences, and the challenges associated with combatting forced labor and child labor in our supply chain at conferences, through joint letters, signing public pledge campaigns, and other public forums. The goal of our participation in these initiatives is to raise awareness of the issue, to help other companies build an internal business case for action on modern slavery, to encourage government progress towards better legal protections for migrants, and to advance wider stakeholder dialogue about how we can collaborate on meaningful actions to ensure freely chosen employment for all workers and legal protections for those that are most vulnerable. For example, during the reporting year, HPE:

- Supported various initiatives through our RBA and LGRR memberships, encouraging governments to engage and prioritize forced labor; and
- Shared best practices through presentations or discussions at various global events, including the WEF Global Data Partnership on Forced Labor, the Global Responsible Recruitment Forum, IHRB Circle of Leaders, UN Global Compact UK quarterly, HPE Gives Human Rights Accelerator, KnowTheChain investor meeting, the RBA Annual Conference 2025, and an Allies Against Slavery convening of data leaders.

HPE's commitment to combatting the risk of modern slavery and child labor in our global operations and supply chain is supported at the Executive Committee level. Indeed, many of HPE's best practice sharing and thought leadership events in 2025 were facilitated through deep engagement of HPE's Chief Operating and Legal Officer, including co-hosting modern slavery events with the WEF and with the Global Commission Against Modern Slavery.

HPE worked with the WEF's Global Data Partnership against Forced Labour to help launch a Proof of Concept (PoC) in Thailand. The PoC is designed to demonstrate how federated data can generate actionable intelligence against forced labor. Its goals are to build trust among stakeholders, prove the technical feasibility of federated data-sharing, and show real-world value through humanitarian and supply chain use cases. Activities include onboarding diverse partners, connecting fragmented datasets, piloting multilingual tools and federated AI models, and testing governance and safeguards. The PoC ran through 2025, with early results presented at the WEF Annual Meeting in Davos in January 2026. This pre-Davos phase will be followed by post-Davos phases in 2026, to scale impact further.

We also frequently meet directly with experts in government, NGOs, and other organizations that are focused on combatting forced labor, bonded labor, and human trafficking. We recognize this is a very complex issue and are always seeking to learn more about areas of risk, the ways in which workers are recruited and employed within specific local contexts, and new initiatives focused on tackling these issues across industries.

We continue our active participation in several organizations dedicated to advancing meaningful reform around issues related to modern slavery. For example, we are a founding member of the LGRR, formed by the Institute for Human Rights in Business. The LGRR advocates for broad, cross-sectoral adoption of the "Employer Pays Principle." We believe it is important to continue highlighting the risks associated with worker-paid recruitment fees, and that we, in partnership with the LGRR and other leading companies, can further promote awareness and help other companies identify the necessary tools to adopt the Employer Pays Principle in their own supply chains.

HPE is also an active member of RLI (joining the [RLI Steering Committee](#) in 2023), and became the Member Chair of the RLI Steering Committee in 2025. Convened by the RBA, RLI has become a multi-industry, multi-stakeholder initiative focused on the rights of workers vulnerable to forced labor, child labor, bonded labor, and human trafficking in global supply chains.

We hope that by continuing to expand the universe of available resources, companies will be better able to address risks of forced labor, child labor, bonded labor, and human trafficking.

This statement was approved by the Board of Hewlett Packard Enterprise Company on April 2, 2026.

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Gary Reiner

Director and Chair of the Nominating and Governance Committee of the Board of Directors of  
Hewlett Packard Enterprise Company

## **Pursuant to the Canada Fighting Against Forced Labour and Child Labour in Supply Chains Act (the “Act”):**

In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for Hewlett Packard Enterprise Canada Co., Hewlett-Packard Financial Services Canada Company and Juniper Networks Canada Inc. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.

This statement was approved pursuant to section 11, paragraph 4(a) of the Act.

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Gary Reiner

Director and Chair of the Nominating and Governance Committee of the Board of Directors of  
Hewlett Packard Enterprise Company

April 2, 2026

I have the authority to bind Hewlett Packard Enterprise Company, the entity which ultimately controls Hewlett Packard Enterprise Canada Co., Hewlett-Packard Financial Services Canada Company and Juniper Networks Canada Inc.