



2022 Modern Slavery Transparency Statement

April 2023 reporting for fiscal year ending October 31, 2022

Hewlett Packard Enterprise Company (“Hewlett Packard Enterprise” or “HPE”) is committed to combatting the risk of modern slavery 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, and the California Transparency in Supply Chains Act of 2010. 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,¹ pursuant to the UK Modern Slavery Act of 2015, and Hewlett-Packard Australia Pty Ltd, Hewlett-Packard South Pacific Pty Ltd, and HP Financial Services (Australia) Pty Ltd,² pursuant to the Australia Modern Slavery Act 2018.³ HPE and its consolidated subsidiaries share the same core business operations and supply chains as well as modern slavery policies, processes, and risks further described in this statement.

We are incredibly proud of our leadership in the fight against modern slavery. The Thomson Reuters Foundation has twice recognized HPE for its leadership in combatting modern slavery in our supply chain and operations, awarding HPE the inaugural Stop Slavery Award in 2016 and recognizing our efforts again in February 2021, making HPE the only repeat winner of the award. HPE also earned the highest ranking among 60 of the largest global information communications and technology (ICT) companies, on [KnowTheChain’s 2022 Benchmark](#) (published every two years), and the highest ranking among 43 of the world’s largest ICT companies in the [2022 Corporate Human Rights Benchmark](#).

Our Chief Executive Officer and Board of Directors, as well as the Nominating, Governance, and Social Responsibility (NGSR) Committee of the Board, oversee environmental, social, and governance issues and are committed to operating HPE in a responsible manner. The NGSR Committee guides HPE’s global citizenship activities, providing strategic direction on policies

¹ 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.

² Hewlett-Packard Australia Pty Ltd, Hewlett-Packard South Pacific Pty Ltd, and HP Financial Services (Australia) Pty Ltd are based in Australia and were formed under the laws of Australia.

³ This statement meets the requirements for approval and signature under Australia Modern Slavery Act 2018. This statement was approved by the board of HPE as the “higher entity” and signed by an HPE board member.

and programs related to human rights. The NGSR 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 the Office of Legal and Administrative Affairs. This team of six, led by our Vice President of Anti-Corruption & Social and Environmental Responsibility, and accountable to our Chief Ethics and Compliance Officer, works in partnership with social and environmental colleagues on HPE’s Corporate Affairs team to enforce our policies and commitments relating to the United Nations Guiding Principles on Business and Human Rights (UNGPs) and the principles set forth in the International Labour Organization (ILO) eight core conventions. The SER team provides support, guidance and resources with our partners in global sourcing teams. We partner with local country counsel, other 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.

As part of a company-wide human rights impact assessment, “modern slavery and decent work” was identified as one of HPE’s six most salient human rights risks.⁴ 2021 figures published by the ILO, International Organization of Migration (IOM), and WalkFree suggest the global estimate of people in modern slavery has increased to 49.6 million people, of which forced labor⁵ accounts for 27.6 million.⁶

HPE has committed to respect human rights in accordance with the UNGPs and the principles set forth in the ILO core conventions (covering [Fundamental Principles and Rights at Work](#), including the Forced Labor Convention No. 29 and the Abolition of Forced Labour Convention No 105). Other influential international initiatives, such as the Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises, International Covenant on Social and Cultural Rights, and 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 in light of our experience and emerging best practices.

⁴ International Labour Organization (ILO). (n.d.). What is forced labour, modern slavery, and human trafficking. Retrieved February 14, 2023, from [ilo.org/global/topics/forced-labour/definition/lang--en/index.html](https://www.ilo.org/global/topics/forced-labour/definition/lang--en/index.html); and Decent work. Retrieved February 14, 2023, from <https://www.ilo.org/global/topics/decent-work/lang--en/index.htm>.

⁵ HPE recognizes that modern slavery can take many forms, including forced labor, bonded labor, and human trafficking. HPE uses the ILO’s definitions of forced labor and human trafficking in its policies and programs, and therefore will use the terms “forced labor,” “bonded labor,” or “human trafficking” in addition to “slavery” or “modern slavery” in this statement.

⁶ ILO, IOM and Walk Free. Global Estimates of Modern Slavery: Forced Labour and Forced Marriage. Retrieved December 1, 2022, from https://www.ilo.org/global/topics/forced-labour/publications/WCMS_854795/lang--en/index.htm.

Business structure/supply chain overview

Hewlett Packard Enterprise is a global technology leader focused on developing intelligent solutions that allow customers to capture, analyze and act upon data seamlessly from edge to cloud. HPE customers include small and medium-sized businesses (i.e., SMBs), large global enterprises, and governments and public sector entities. Our products and services are available worldwide. HPE is a corporation incorporated in Delaware, with its global headquarters in Houston, Texas, with approximately 60,200 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 coordinating 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, 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 2007,⁷ 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 [HPE's Conflict Minerals Report](#) and [HPE's 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 to HPE can change. On average, however, approximately two-thirds of HPE's direct supplier facilities are located in Asia, with the remaining one-third located across Europe and North America. Our volume of business with most of these suppliers, although business cycle dependent, is relatively consistent outside of unforeseen business disruptions related to factors such as natural disasters and disease.

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 students and dispatch labor in China, foreign students in Japan, and migrant workers in certain high-risk countries in Asia. Forced labor risks can increase when facilities are dependent on recruitment agents or temporary workers. As such, we review supplier practices for managing agents and contractors, and require suppliers to limit dependence on them. We noted that these risks are not associated with types of products, but are often associated with local country practices and laws on foreign migrant workers and sub-tier operations – e.g., higher risk further down our supply chain. This year, we continued reviewing these risks and further strengthened our approach for identifying potentially higher-

⁷ 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 HP, as well as HPE.

risk suppliers in our indirect supply chain. Factors that may indicate higher risk in our indirect supply chain include low skilled labor, dependency on temporary or foreign workers, and specific types of services such as facility management, security and construction. We have introduced more robust and formalized monitoring for these highest risk indirect suppliers.

As outlined in [HPE's 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 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 Responsible Business Alliance \(RBA\)](#), the Business Roundtable on AI and Human Rights, the World Economic Forum (WEF), Business Against Slavery Forum, 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.

As a company whose purpose is to advance the way people live and work, HPE remains committed to upholding human rights during the COVID-19 pandemic, and reviewing heightened risk of modern slavery due to pressures from the pandemic. We acknowledge the need to maintain effective channels of communication so any individual can raise issues or concerns without fear of retaliation, and our SER team, supported by senior leadership, is continuing to review for elevated human rights risks. We have taken steps, in consultation with our suppliers, to review and understand risks to workers in our supply chain, to identify the most vulnerable worker populations, and to help suppliers protect workers and strengthen their resiliency to a crisis, including the current COVID-19 pandemic. For more information, see [HPE Supply Chain Responsibility: COVID-19 Response](#).

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 accordance with the UNGPs. HPE's [Standards of Business Conduct \(SBC\)](#) and U.S. Public Sector Anti-Human Trafficking Policy contain prohibitions on forced labor, bonded labor, and human trafficking—as well as conduct that can contribute to forced labor and human trafficking. Our modern slavery strategy and roadmap guides our work on modern slavery, which we review annually and update as needed. We seek to engage all relevant stakeholders, including workers, in selecting our priorities in order to focus on issues that will have the greatest overall impact.

The HPE [Migrant Worker Standard](#) demonstrates our leadership on issues related to addressing modern slavery. This standard adopts an industry-leading “Employer Pays Principle” approach to the foreign and domestic migrant workforce 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 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 Migrant Worker Standard, HPE's external relationships (i.e., supplier and partner relationships) are governed by HPE's Supplier Code of Conduct, which fully aligns with, and in some cases, extends beyond the RBA Code of Conduct 7.0 (effective January 1, 2021). HPE's other leading standards include our Student and Dispatch Worker Standard for Supplier Facilities in the People's Republic of China, Partner Code of Conduct, and 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 are highest in our supply chain, specifically at the sites where our products are manufactured. Our 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 labor. We require independent audits against our Supplier Code of Conduct, and we supplement those audits with assessments on specific risk areas, such as modern slavery. A non-conformance (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 and number of vulnerable workers. We encourage suppliers to apply best practices and support them with training and guidance on specific issues, including combatting forced 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 student and dispatch workers in China. In both instances, our approach has been to:

- Map and identify the key risks related to how workers are recruited and employed;
- 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—in addition to our standard social compliance audit—and carry out in-depth assessments for supplier sites employing these vulnerable workers (e.g., HPE’s migrant worker assessment);
- 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, both internally (e.g., awareness building and sponsorship for employee volunteer opportunities to support modern slavery initiatives) and globally.

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 strive to refine our policies, actions and disclosure to reflect such improvements. Every year we review our approach to supply chain responsibility, which includes incorporating new metrics, where appropriate, to measure and internally report our SER program’s effectiveness. In 2022, we updated our commitments and approach, and:

- Refined our tools and approaches to detecting forced labor.
- Reviewed opportunities to further document our mapping of the origin of products and components, and - in partnership with our sourcing colleagues - facilitated many one-to-one conversations with suppliers to understand their potential exposure to forced labor risk further in their supply chains, and provide guidance on collectively enhancing programs and documentation.
- Reviewed and expanded our understanding of forced labor risks all the way up our supply chain, at the minerals level, and built supplier awareness of these risks.
- Published our Commitment to Respect the Rights of Marginalized Groups (covering migrants, women, children and youth, racial and ethnic minorities, and human rights defenders), following in-depth internal and external stakeholder engagement to better refine our commitment and overall approach to applying a vulnerable groups lens.

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

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 five years in a row (2019 through 2023) for exemplifying and advancing corporate citizenship, transparency and the standards of integrity.

Hewlett Packard Enterprise requires all its employees to comply with our SBC, which includes provisions prohibiting the use of child, prison, or forced labor in HPE operations. In 2022, we included human rights in our SBC training for all new employees. 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, 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 can 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](#). For more information on HPE employee trainings, 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 HPE's 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's requirements. 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 social and environmental responsibility requirements, including those related to forced 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 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 [HPE's 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 [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-conformances can also place a supplier at risk of business implications.

We value and nurture our relationships with key suppliers. Therefore, we place a high priority in 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 matter, 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 adheres to the UNGP approach, whereby companies should use their leverage to incentivize the partner to prevent, mitigate, or remediate the human rights impacts. In addition, we generally follow the UNGP approach that the prospect of disengagement can serve as a means 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 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 has expanded its engagement with indirect suppliers by formally rolling out the SER program's work to indirect suppliers, and continuously expanding and evolving our work in that space. For these suppliers that provide services and goods to support our own operations, we focus on prevention (through selection of suppliers based on alignment with HPE's commitments to and performance on preventing forced labor), collaboration (monitoring along with a shared journey of continuous improvement), and innovation (to work effectively and focus on program priorities such as worker voice and forced labor). From 2022, we incorporated formal third-party monitoring requirements and annual risk assessments for indirect suppliers.

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, the UN Global Compact, 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 with NGOs, including, but not limited to Verite, Migrant Forum in Asia, International Organization for Migration, 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, monthly key performance indicator reports, Verite's CUMULUS tool (reviewing supplier agreements and management systems in relation to how they work with recruitment agencies), engagement with and review of findings and recommendations from NGOs such as Migrant Forum Asia, 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 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 US State Department on child labor, wages, contracts, forced labor, worker rights, chemicals, climate index.
- **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, 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 regularly map our supply chain to ensure visibility of our major tier 1 and tier 2 suppliers, and assess risks.

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 trainings, partnerships, and capability building programs.

We primarily focus our program engagement on those suppliers with which Hewlett Packard Enterprise has a direct contractual relationship, including final assembly suppliers, as well as strategic commodity suppliers. We typically work with these suppliers over a number of years, and therefore they have the opportunity to build an understanding of our standards and expectations. In some instances, where we identify specific risks or an opportunity to have a significant impact, we may engage suppliers deeper in our supply chain, with the support of our direct suppliers, though this approach may have limitations based on our relationships with individual suppliers. 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 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 allegations related to forced labor.

Comprehensive, independent third-party audits evaluate supplier performance against our Supplier Code of Conduct, including the provisions on freely chosen employment. The majority

of these audits are conducted through the RBA Validated Assessment Process (VAP). 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, bonded labor, and human trafficking. In FY22, 88 site audits and assessments were conducted at supplier facilities. (For more information on our audit program, please see HPE Living Progress.)

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 it, such as if we have strong reason to believe workers were coached.

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

In addition to audits and assessments, in 2020 we developed, implemented, and donated to RBA members our tool for developing robust, inclusive, and timely reimbursement plans with the supplier and monitoring progress of reimbursement to the workers. This tool allows HPE to closely track and review evidence of suppliers’ improvement between audits on matters of concern. We also actively engaged in the development of RBA’s Standard for the Investigation and Repayment of Fees, which became effective in 2021. 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 these trainings as:

Multi-supplier trainings	Direct 1:1 capacity-building with suppliers	Worker training	Internal team trainings – such as sourcing – who help enforce our policies and standards
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Internal

All HPE employees must complete annual training on the HPE SBC. All new employees must complete SBC training shortly upon joining HPE, which includes our Global Human Rights Policy, our salient risks, and how to escalate or raise concerns without fear of retaliation. The SBC specifically prohibits child labor, prison or forced labor, and physical punishment throughout our 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 courses on key SCR issues and on effective management of suppliers' SCR performance. We offer more targeted training for HPE employees on Human Trafficking Awareness through various employee awareness and volunteering events, as well as through our virtual university, Accelerating U. The purpose of the internal Human Trafficking Awareness training is several fold, including to: 1) emphasize why the employee should care about human trafficking in their role at HPE; 2) provide a definition of "human trafficking;" 3) dispel common myths about human trafficking; 4) highlight key HPE policies that prohibit human trafficking; 5) provide a list of red flags to look for in interactions with colleagues and business partners' employees; 6) explain how an employee can act on concerns that they or someone else may be in a situation of human trafficking; and 7) highlight ways employees can volunteer to combat modern slavery in the communities where they live and work.

We carry out modern slavery awareness trainings open to all employees, in collaboration with organizations that we partner with on HPE's modern slavery volunteering initiative. 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.⁸

For example, throughout FY21 and FY22, HPE employees donated their time and expertise to work with Sophie Hayes Foundation in the UK to develop survivor-informed online security training for survivors of human trafficking. Survivors played an important role in informing content and the approach of this training.

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 such buyers' purchasing practices can exacerbate or reduce risk of forced labor in our supply chain. In 2022, we formalized this training, offering annual in-depth training 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 practice on our sourcing practices and aim to leverage our practices to positively impact supplier SER performance.

⁸ Volunteering through our Antislavery Volunteer Initiative is feasible for many employees because HPE offers all employees 60 hours of paid volunteer time off per year and matches up to \$5000 per employee, which may be allocated to match monetary donations or donations of volunteer time.

External

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

Training and capability building activities in 2022 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 these training sessions. By taking this collaborative approach, we reinforce our industry's commitment on 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. Our live, facilitated trainings this year covered forced labor in great depth, through multiple facilitated trainings. In this type of training alone, we reached approximately 65% of suppliers in our program (which covers tier 1 and tier 2 suppliers who account for 98% of our supply chain spend. For example:
 - In August 2022, we co-sponsored supplier responsibility trainings in partnership with suppliers and peers, including Intel Corporation, Western Digital Corporation, HP Inc., and Seagate Technology PLC. RBA, our key partner in standard-setting, auditing, and industry collaboration, facilitated the training sessions. We worked with Verite to facilitate these live trainings across multiple days for both Asia Pacific and Europe/North America. The facilitated trainings covered how to identify forced labor issues and risks, providing effective remedy, standards updates, government perspectives, and more. The training reached 144 representatives throughout our extended, global value chain. Feedback from sessions was overwhelmingly positive, with over 88% of attendees for part I and 95% of attendees for part II rating their overall learning experiences as excellent or very good.
 - In FY22 we supported preparations for three in-person forced labor training sessions for suppliers and their sites located in Taiwan, delivered in local language. These in-depth, in-person trainings for SMBs reached at least 8 direct supplier attendees as well as broader industry and supply chain partners. The content was locally tailored and covered the 11 forced labor indicators in depth and with real-world examples. This training was in partnership with multiple brands across industry under the leadership of a global garment brand and Work Better Innovations as part of a [project aimed at promoting international labor standards in Taiwan](#), particularly on forced labor as it manifests locally.
- **Addressing risks due to COVID-19:** HPE continued to support suppliers and their workers as the pandemic persisted, leveraging our 2020 Supplier Guidance on Social Responsibility and COVID-19, which recognizes migrant vulnerability to

modern slavery during a pandemic, and lays out best practices in three areas for electronics manufacturers in order to maintain labor standards and promote worker well-being enhanced health and safety, enhanced benefits, and enhanced communication with workers. For most sourcing locations, the impact of the pandemic on worker wellbeing dramatically reduced in 2022.

- 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 understanding the requirements of the UK Modern Slavery Act and California Transparency in Supply Chains Act; recognizing and preventing forced labor; working with labor brokers; and understanding continuous improvement and utilization of key performance indicators. 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 disseminates best practices and resources to all suppliers in our program. We send a monthly best practice note on specific responsible supply chain topics, including areas of forced labor, with the intent of increasing supplier engagement and support for continuous improvement.
- Worker Human Rights Training: We worked with peers and an industry membership group to develop worker human rights training, and organized a piloting of the training, with the goal of rolling this free training out to all workers in our supply chain.
- 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 or critical findings, speaking with them regularly to strengthen their understanding of root causes, plan appropriate and effective management systems, and engage with workers to roll out new practices that are robust, effective, and trusted by workers. We also regularly requested and reviewed in great detail, evidence of progress from suppliers.
 - HPE scheduled targeted annual check-ins with suppliers, which are annual in-depth discussions on HPE's SER priority areas (including, preventing and addressing forced labor, extending our standards deeper in their supply chains, and worker voice).

This coming year we will continue to provide training in all categories, including two notable efforts:

- Training suppliers on our updated Migrant Worker Standard, helping our suppliers demonstrate our joint commitment to the principles set forth in the ILO Core Conventions, especially ILO Forced Labor Convention, 1930 (No. 29) and Abolition of Forced Labor Convention, 1957 (No. 105), Minimum Age Convention, 1973 (No. 138), Worst Forms of Child Labour Convention, 1999 (No. 182), and the Convention on the Rights of the Child.
- Completing our pilot of human rights training for workers, and planning to make training free and accessible to all our suppliers.

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, in FY22:

- HPE worked with peers and suppliers to understand emerging forced labor risks across Asia, and best practices in assessing and preventing forced labor.
- HPE recognizes forced labor and wage risks are often linked. We continued to actively participate in the RBA taskforce on living wages, and conducted additional engagement with peer companies to specifically research and plan how to introduce living wage measures across the electronics supply chain. No single electronics company can achieve this without collective action. In FY22, we began planning our practical pilot program for implementing a living wage, including trialing different approaches, and engaging with suppliers. This pilot will occur in 2023.
- HPE continued to engage and demonstrate our leadership in the Employer Pays Principle through active engagement with the LGRR. In FY22, we launched three social goals, one of which is to achieve 100% of HPE suppliers committed to the employer pays principle by 2030. As of FY22, 94% of our major suppliers (95% of our supplier spend) have committed, and we have begun reaching out to additional suppliers to obtain evidence or support them on this journey to make their commitments and practices more robust.

In 2022, HPE launched 3 social supply chain goals to achieve by 2030:

- 100% of HPE suppliers committed to the employer pays principle.⁹
- 100% of major HPE suppliers train their workers on human rights.
- 100% of HPE supplier sites (tier 1 and 2) have effective grievance processes.

Program Effectiveness

We have taken significant action in the past few years to improve our efforts to mitigate the risks of forced labor, particularly in our supply chain. This has included updating our supply chain standards, developing more specialized tools for monitoring supplier performance (including with respect to supplier conformance with the HPE Migrant Worker Standard), developing supplier guidance materials, conducting specific supplier trainings (as well as the promotion of non-HPE trainings and guidance materials), building awareness within HPE and having a more active voice in public fora.

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 ongoing continuous improvement and our strategy going forward.

Since its inception as an independent company in November 2015, HPE has monitored for risks related to the recruitment and employment of foreign migrant workers at supplier sites. We also carry out research and engage key stakeholders to understand the challenges facing the most

⁹ 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.

vulnerable groups in our supply chain in order to develop potential solutions to address these issues. We prioritize foreign migrant worker assessments at sites that we evaluated to be highest risk based on location, number of foreign migrant workers, and preliminary information provided through supplier SAQs. COVID-19 restrictions and outbreaks continued to present health and safety risk when conducting onsite, in-person specialized foreign migrant worker assessments. Despite these restrictions, HPE continued to maintain a high level of monitoring. For example, we leveraged RBA's virtual and semi-virtual audits, and continued to commission supplier assessments through Verite's CUMULUS tool, which works remotely with suppliers to assess policies, practices, and agreements between suppliers and their recruitment agents.

HPE is committed to ongoing continuous improvement in the identification of forced 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.¹⁰

Since HPE adopted the Employer Pays Principle in 2016, the cumulative total of recruitment fees reimbursed to workers in our supply chain is now at \$1.9 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 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 2021 updates to remedy requirements in our Migrant Worker Standard). Worker feedback prompted our work with peers to develop worker human rights training and subsequently, our social goal on worker training.

A review of our findings by supplier type and tier suggests the nature of forced labor risks are the same across all suppliers, namely fees, restricted movement, and withheld documents, but are more prevalent further down our supply chain.

In instances where a finding is rated critical or priority (see *Accountability* above, for a discussion on ratings), HPE requires a thorough on-site assessment with third-party auditors to validate that all required corrective actions have been completed as discussed. Additionally, 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 polices as reflected in our scorecards, and work closely to monitor progress of identified corrective actions.

We take each finding seriously and believe that uncovering these issues shows that our approach is working. But based on our understanding of the root causes and enabling factors of these risks, we

¹⁰ See HPE's Living Progress Report for details on HPE's most critical risks.

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 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 make sure that suppliers fully understand our requirements and are proactively working to ensure conformance with HPE requirements.

As noted in the section above, this year we targeted several capability-building efforts to meet the particular 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.

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 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, in FY22, HPE:

- Supported various initiatives through our membership, encouraging governments to engage and prioritize forced labor.
- Shared best practices through presentations or discussions at various global events including:
 - Our approach to human rights for the UN B-Tech Community of Practice group, comprised of human rights professionals from global technology leaders.
 - Accountability and remedy in the technology sector at a UN conference titled OHCHR Multi-Stakeholder Consultation on Access to Remedy in the Tech Sector (March 2022).
 - Our Commitment to Respect the Rights of Marginalized Groups for the Business Network on Civic Freedoms and Human Rights Defenders (April 2022).
 - Our modern slavery work in a discussion with authors of the ILO-IOM-Walk Free Global Estimates of Modern Slavery Report (September 2022).
 - Gender, migrants, and responsible recruitment at the Global Forum for Responsible Recruitment (November 2022).
 - Corporate responsibility and respect for human rights defenders at the 11th UN Forum on Business and Human Rights (November 2022).

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. Convened by the RBA, RLI has become a multi-industry, multi-stakeholder initiative focused on the rights of workers vulnerable to forced labor, bonded labor, and human trafficking in global supply chains.

HPE has contributed its expertise, tools, and resources to other companies as well. For example, we regularly share our standards and tools with the RBA and its broader membership, including (jointly with HP Inc.) the Hewlett-Packard Company Foreign Migrant Worker Supplier Transition Guidance Document in 2016, the Hewlett Packard Enterprise Migration Corridor Database in 2017, the fee reimbursement tool in 2020, and collaborative Supplier Guidance on Social Responsibility and COVID-19 in 2020.

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

This statement was approved by the Board of Hewlett Packard Enterprise Company on April 6, 2023.

Gary Reiner

Director and Chair of the
Nominating, Governance and Social Responsibility Committee of
Hewlett Packard Enterprise Company