



2024 Modern Slavery Transparency Statement

April 2025 reporting for fiscal year ending October 31, 2024

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,¹ pursuant to the UK Modern Slavery Act of 2015; 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 and Hewlett Packard Enterprise Canada Co. and Hewlett-Packard Financial Services Canada Company,⁴ 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, 2024, and describes foundational work

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. To prepare this joint statement, we consulted with each of the Australian reporting entities covered by this statement.

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 in their capacity as the principal governing body (the “higher entity”) on April 3, 2025 and signed by an HPE board member.

⁴ 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.

undertaken in previous years where relevant to the description of these activities.

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”) companies, on [KnowTheChain’s 2025 ICT Benchmark](#), and the highest ranking among 43 of the world’s largest ICT companies in the [2022 Corporate Human Rights Benchmark](#).⁵

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 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 Operations, Legal and Administrative Affairs. This team of five, led by our Director of Global Human Rights, reports to our Vice President of Global Trade & 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.

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.⁶ 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 labor⁷ accounts for 27.6 million.⁸

⁵ The 2022 Corporate Human Rights Benchmark rankings are the most recent evaluations of ICT companies against this benchmark, at the time of publishing this statement.

⁶ International Labour Organization (“ILO”). (n.d.). What are forced labour, modern slavery, and human trafficking? Retrieved March 6, 2025, from <https://www.ilo.org/global/topics/forced-labour/definition/lang--en/index.html>; and Decent work. Retrieved March 6, 2025, from <https://www.ilo.org/topics/decent-work>.

⁷ 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.

⁸ ILO, IOM and Walk Free. Global Estimates of Modern Slavery: Forced Labour and Forced Marriage. Retrieved March 6, 2025, from https://www.ilo.org/global/topics/forced-labour/publications/WCMS_854795/lang--en/index.htm.

HPE has committed to respect human rights in accordance 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, 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.

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 government and public sector entities. Our products and services are available worldwide.⁹ HPE is a corporation incorporated in Delaware, with its global headquarters in Houston, Texas, with approximately 61,000 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 2007,¹⁰ 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 73% of HPE’s direct supplier facilities are in Asia with the remaining 27% located across Europe and the Americas.

⁹ See further information on HPE’s Products and Services at its website, available from <https://hpe.com/uk/en/home.html>.

¹⁰ 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.

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. 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. We note 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 of forced labor further down our supply chain in the production of certain components such as memory parts, cables and connectors, and resistors. As a result, we plan to commission independent forced labor assessments in these areas.

During 2024, we continued reviewing these risks and further strengthened our approach for identifying potentially higher-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 migrant workers, and specific types of services such as facility management, security, and construction. We have introduced more robust and formalized monitoring for these potentially higher risk indirect suppliers and engaged two suppliers in a high-risk country to undertake their first full Responsible Business Alliance (“RBA”) audit.

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 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 accordance 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 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, 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 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. 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 and child labor. We require independent audits against our Supplier Code of Conduct, and our approach includes supplementing those audits with assessments on specific areas of risk, 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 the 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, 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. 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 strive to refine our policies, actions, and disclosure to reflect such improvements. 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 2024, we took several steps to advance our approach, including:

- Conducting a forced labor risk review, including a deep dive of our data on forced labor risks and findings;
- Reminding manufacturing workers and onsite-services-provider workers at our manufacturing sites about the availability and accessibility of our internal grievance mechanisms;
- Advancing our work with indirect suppliers by identifying suppliers and facilities that have potential forced labor risk and placing them in-scope for SER audits and engagement. This resulted in full RBA audits, the collaborative development of corrective action plans, and subsequent follow-up to ensure progress and completion;
- Increasing our engagement with key organizations in this space, including through our role on the RLI Advisory Committee and our Chief Operating and Legal Officer’s (“COLO”) board membership at The Anti-Slavery Collective (“TASC”);
- Launching a [partnership with the International Rescue Committee](#) (“IRC”) to pioneer innovative digital initiatives to help create a profound and measurable impact against human trafficking;
- Launching our HPE responsible purchasing committee, with members of the SER team and the global sourcing organization, to discuss how our company can identify and mitigate practices that may lead to social issues in our supply chain, and how we

- can promote practices that enable our suppliers to treat their workers fairly; and
- In preparation for, and to facilitate effective action in FY25, actively expanding our programmatic reach with tier 2 suppliers, including collecting and analyzing forced labor risk data and working in partnership with direct suppliers to commission third-party forced labor assessments across highest risk tier 1 and tier 2 suppliers.

For 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 seven years in a row (2019 through 2025) 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](#).

In 2024, we reminded manufacturing workers and onsite-services-provider workers at our manufacturing sites about the availability and accessibility of our internal grievance mechanisms. We received one grievance through the mechanisms in place, from a supplier's worker about practices by management and their recruitment agencies (discussed further below). We quickly responded to the worker and kept them updated as we investigated and worked with the supplier to make improvements.

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 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 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 key 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 adheres to the [UNGP approach](#), through which 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 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 continued to expand its engagement with indirect suppliers by formally rolling out the SER program's work to 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 with NGOs, including, but not limited to Verite, Migrant Forum in Asia, 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, monthly key performance indicator reports, Verite'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 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 training, partnerships, capability building programs and specialized forced labor 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. Increasingly, we work with our 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 ECO 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 FY24, 147 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 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 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 training on our Global Human Rights Policy, our salient human rights risks, and 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 courses to team members who source and manage relationships with our suppliers 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. The purpose of internal human trafficking awareness training is to:

- emphasize why the employee should care about human trafficking in their role at HPE;

- provide a definition of human trafficking;
- dispel common myths about human trafficking;
- highlight key HPE policies that prohibit human trafficking;
- 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 human trafficking; 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.¹¹

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.

Throughout FY24, HPE employees also donated their time and expertise to continue work with the Sophie Hayes Foundation and The Anti-Slavery Collective to update and extend access to survivor-informed online security training for survivors of human trafficking. Survivors of human trafficking 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 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.

During 2024, we launched our HPE responsible purchasing committee, with members of the SER team and the global sourcing organization, to discuss how our company can identify and mitigate practices that may lead to SER issues in our supply chain, and how we can promote fair practices that enable our suppliers to treat their workers fairly. We also provided tailored training for HPE's Quality and Engineering team, who frequently visit our final assembly suppliers. Given these regular visits, the training focused on how to identify potential forced labor risks at supplier sites.

¹¹ 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 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 2024 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 51% 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 October 2024, we co-sponsored supplier responsibility training in partnership with suppliers and peers, including Intel Corporation, Western Digital Corporation, HP Inc., and Seagate Technology PLC. We worked with our key partner in forced labor collaboration, the RBA, who facilitated these live training sessions across multiple days for both Asia Pacific and Europe/North America. The facilitated training covered updates to RBA's Code of Conduct (version 8.0), the ILO Indicators of Forced Labour, how to identify and mitigate forced labor risks, the elements of a good grievance mechanism, and principles of worker-driven remedy. Training addressed forced labor issues best practice, such as the importance of posting jobs accurately; completing contracts in the native language before departing; not substituting contracts; providing timely and understandable pay slips; not restricting movement; and ensuring there is no harassment or discrimination, retention of identity documents, and recruitment fees. The training explained that grievance mechanisms should be legitimate, accessible, and transparent; that there should be an option to raise grievances anonymously and without fear of reprisal; and that suppliers should quickly investigate grievances with a fair process, communicating the outcomes to the people involved, and maintaining records. The training reached 460 representatives coming from more than 40 supplier companies and over 250 facilities throughout our extended, global value chain.
- **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 use 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 occasional best practice notes 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 digitize worker human rights training on a mobile platform, piloted the training with select suppliers, and launched the training with our suppliers, free of charge, in early-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 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 on forced and child labor; and actively promoting new mobile-based human rights training to all suppliers and their workers and supporting roll-out of this training.

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 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 and conducted additional engagement with peer companies to specifically research and plan how to introduce living wage measures across the electronics supply chain. 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. We continue to strive towards meeting our three social supply chain goals, one of which is directly focused on 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.

As of January 2025, this is where HPE stands on its social supply chain goals (to achieve by 2030), with our suppliers (based on HPE's 95% supplier spend):

- **97%** of HPE major suppliers committed to the Employer Pays Principle (2030 goal: 100%);¹²
- **77%** of major HPE suppliers train their workers on human rights (2030 goal: 100%); and
- **87%** of HPE major supplier sites have implemented effective grievance processes (2030 goal: 100%).

Going forward, we will track our social supply chain goals based on HPE's 98% supplier spend. As of January 2025, based on 98% supplier spend: 78% of HPE suppliers committed to the Employer Pays Principle; 63% of HPE suppliers train their workers on human rights; and 76% of HPE supplier sites have implemented effective grievance processes.

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 suppliers to build their capability to align with our goals and implement best practice.

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 training and guidance materials), building awareness within HPE and having a more active voice in public fora, focusing on prevention of forced labor, and helping raise awareness of this critical issue across industries.

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.¹³

¹² 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.

¹³ See HPE's Living Progress Report for details on HPE's most critical risks.

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 2024 was \$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 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 2021 updates to 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.

While we had no critical findings in FY24, we identified some instances of non-critical forced labor findings (e.g., small health check fees and one instance of recruitment fees). HPE takes all findings related to forced labor seriously, placing a high degree of importance on addressing these findings with our suppliers. We work quickly with suppliers to address them, even if they are only indicators of potential risk and even if our connection with the supplier and the risk is minimal.

In all cases of forced labor findings, HPE reviews the allegation, commissions an investigation as appropriate, and works with the supplier to review and approve their Corrective Action Plan, make improvements, and ensure appropriate remediation. All supplier policies and practices have been improved to further align with our Supplier Code of Conduct, which prohibits forced labor. For all forced labor instances that significantly impact workers, HPE follows its internal critical incident response process, which includes reviewing suppliers' corrective action plans, updates on progress with evidence, worker reports, and ultimately an independent closure audit.

We did not identify any instances in 2024 where remediation was required to address any loss of income to the most vulnerable families resulting from our responses to the above findings.

A review of our findings by supplier type and tier suggests the nature of forced labor risks are the same across all types of suppliers, namely fees and weak policies or processes for ensuring no fees, as well as insufficient worker employment contracts, 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 policies as reflected in our SER Scorecards, and work closely to monitor the progress of identified corrective actions.

We take each finding seriously and believe that uncovering these issues shows that our approach is working. 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.

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 or priority 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 fees are identified. We track all fees to all in-scope workers, requiring and achieving to date, full reimbursement.
- 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:

- Made a [pledge](#) reinforcing our commitment to combat forced labor in our supply chain, in honor of the 75th anniversary of the Universal Declaration of Human Rights (December 2023);
- 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 human rights challenges and opportunities through a UN Plenary on the 75th anniversary of the Universal Declaration of Human Rights at the UN Forum on Business and Human Rights (November 2023), and announcing winners of HPE funding through the MIT Solve Supporting Survivors of Modern Slavery Challenge (September 2024).

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 FY24 were facilitated through deep engagement of HPE's Chief Operating and Legal Officer, including:

- Publishing of various modern-slavery related content, such as blog posts (January and September 2024), an article in the HPE Dopler magazine (October 2024); a HPE Technology Now podcast on modern slavery (October 2024); and a TechTalk and interview on modern slavery at HPE's flagship Discovery event (June 2024);
- Presenting on modern slavery at Grace Farms flagship event, Design for Freedom Summit (March 2024);
- Participating in a [WEF livestream panel](#) on the role of public-private partnerships, AI, and stronger legislation to combat human trafficking (September 2024); and
- Co-hosting modern-slavery related events, such as with WEF and industry experts (September 2024); and a Goals House luncheon during UN General Assembly week (September 2024).

Building on our action in the reporting year (and prior to publishing this report) we have also undertaken the following initiatives:

- Speaking on a plenary panel titled, "The Promise and Limits of Supply Chain Transparency" and a breakout session titled, "Responsible Purchasing Practices: The Missing Link for More Sustainable Supply Chains?" at the RBA Annual Conference (November 2024); HPE Foundation sponsoring of Lisa Kristine to embark on a photographic journey of the electronics supply chain to capture the firsthand experiences of forced labor (November 2024);
- Working with the RLI to launch a Forced Labor Data Working Group (December 2024); and
- Collaborating with WEF to prepare and launch the Global Data Partnership against Forced Labour at the WEF Annual Meeting 2025 in Davos (January 2025).

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 3, 2025.

Gary Reiner

Director and Chair of the Nominating, Governance and Social Responsibility 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. and Hewlett-Packard Financial Services Canada Company. 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.

Gary Reiner

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

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