



Global Business Amenities Policy (GBAP)

Introduction

This policy identifies when you may give Business Amenities (including Gifts, meals, Entertainment and Travel) to customers, partners, suppliers and other third parties. This policy also identifies when you may accept Business Amenities from third parties.

If done transparently, openly and for a legitimate purpose, Business Amenities are often appropriate. Business Amenities that lack transparency or a legitimate business purpose may harm our business and damage HP's reputation. Inappropriate Business Amenities may be viewed as a bribe and may be prohibited by law or by the recipient's employer.

Before giving or accepting any Business Amenity, you must obtain all approvals required by this policy and, when required, submit a request through the Amenities Approval Tool (AAT). You must also maintain accurate records regarding any Business Amenities.

Because some countries have more restrictive rules than those provided herein, you must follow any country-specific rules that may apply.

If you have questions about this policy or are unsure of the right course of action, discuss with your manager, your designated attorney or email amenities@hp.com.

Scope

All HP directors and employees must follow this policy whenever giving anything of value to a Third Party or receiving anything of value from a Third Party.

This policy does not apply to the following:

- Activities involving only HP employees, like team meals or a Gift given by an HP employee to an HP employee
- Things of value that the recipient receives as a condition of sale, under the terms of a contract or HP partner program (e.g., sales promotions, sales incentives, discounts and rebates). In these situations, other sales or marketing rules may apply.
- Sponsorships, Charitable Contributions and Political Contributions. Any such payments must comply with HP's Anti-Corruption Policy and, respectively, HP's Sponsorship Policy, Global Contributions Policy and Political Participation Policy. The Global Business Amenities Policy applies when giving away anything HP receives for sponsorship, such as product or tickets to the event we are sponsoring.
- Demonstration, Evaluation and Seed Products. Any such products must comply with HP's Anti-Corruption Policy and HP's Corporate Marketing and Sales Policy regarding Demonstration Products ("Demo Unit Policy").

Finally, it is important to recognize that this policy prohibits you from doing indirectly what you cannot do directly. Using a Third Party to circumvent HP policies or internal controls is prohibited. For example, if you cannot give a



Business Amenity under this policy, you cannot have a partner or other person give the Business Amenity for you. This includes asking a Third Party to use Market Development Funds to pay for any prohibited item on HP's behalf.

Key Rules for Gifts, Entertainment, Travel, and Raffles

1. Business Amenities must be reasonable and appropriate. Any Business Amenity must:
 - Follow applicable internal policies, contractual agreements, and/or country-specific rules of both the giver and recipient;
 - Serve a legitimate and appropriate business purpose, such as to promote HP business or image, to foster goodwill or show gratitude; and
 - Not be lavish or extravagant under the circumstances.
2. Some Business Amenities are never appropriate. You should not give or receive:
 - Business Amenities that may improperly influence a business decision;
 - Gifts when there is a pending bid or contract negotiation;
 - Business Amenities that are illegal, contain sexually explicit content or conduct, involve gambling, or could in any way embarrass HP;
 - Cash, per diems or a cash equivalent (e.g., travelers checks, AMEX or VISA gift cards);
 - Gold, precious metals, or gemstones;
 - Business amenities where the frequency, timing, or circumstances create the appearance of impropriety.
3. Business Amenities may not be provided to the Immediate Family Members, significant others, close friends, or business associates of a Third Party. The only exception is the infrequent and customary attendance of an Immediate Family Member or significant other at a commercial sector event of reasonable value. The attendance of the Immediate Family Member or significant other must not create the appearance of impropriety and must follow the limits and approval requirements set forth in the Business Amenities Limits and Approval Requirements section of this policy.
4. You must follow the limits and approval requirements set forth in the Business Amenities Limits and Approval Requirements section of this policy. Any required approval must be obtained before the Business Amenity is offered or given to the recipient. All approvals must be in writing. Email approvals are acceptable. Violations of this Policy may lead to disciplinary action, up to and including termination of employment with HP. Any employee with knowledge or suspicion of any violations of this global policy must report these concerns to the Ethics and Compliance Office.
5. Accurately document the Business Amenity.
 - You must keep accurate records of all Business Amenities provided to and received from any Third Party (including the name and entity of the Third Party) and retain them in accordance with the HP Records Management Policy. In addition, you must follow all expense reimbursement rules, and all uses of HP funds and assets must be documented as required by the HP Accounting and Finance Manual. As a reminder, the most senior person in attendance at a meal/Entertainment must pay so that his or her manager (and not themselves) is authorizing the charge.



Rules for HP Events

HP Events are activities at which HP products and services are showcased and the participants will receive items of value, including meals, Entertainment or Gifts. Business Amenities connected to an HP Event that meets the rules of this section are treated differently and are not subject to the Business Amenity limits below, although such limits should be considered instructive as to acceptable amounts for Business Amenities provided during an HP Event. Examples of HP Events include:

- HP organized corporate activities
- Trade show events
- Road shows
- Executive Briefing Center/Lab visits
- Seminars and lunch and learns
- Media events
- Demonstrations of HP products
- CIO events
- Advisory councils
- Technical workshops
- Partner event or conference
- Product showcases

1. Before arranging an HP Event, ensure that:
 - It is for a legitimate purpose to demonstrate or promote HP's products and services;
 - The agenda contains at least 80% business activities and no more than 20% leisure activities;
 - Gifts and Entertainment, including meals, provided in connection with the HP Event are not lavish;
 - You follow any country-specific limits that may apply to the home country of attendees or to the country in which the HP Event will be held.
2. If a Public Sector individual will be invited, follow the approval requirements below in the Business Amenities Limits and Approval Requirements section.
3. If only Commercial Sector individuals will attend, maintain appropriate records.
 - The HP Event organizer must maintain records of the Business Amenities provided (including the value) and a record of the attendees (such as name, email address, company name, and position) in accordance with the HP Record Retention Guidelines.



Business Amenities Limits and Approval Requirements

Public Sector

<u>Item</u>	<u>Manager Approval Required</u>	<u>Executive + AAT Approval Required</u>	<u>Additional Information</u>
Gifts	\$0 - \$100	--	<ul style="list-style-type: none"> - Over \$100 Prohibited - Limited to once per quarter
Meals or Entertainment	\$0 - \$150	--	<ul style="list-style-type: none"> - Over \$150 Prohibited - Limited to once per quarter
Travel	--	All	
Raffle / Lucky Draw	\$0 - \$999.99	\$1000.00 +	<ul style="list-style-type: none"> - Tax forms may be required, contact your local Controllershship Office - Winner of prize of \$1000.00+ must complete the Raffle Acceptance Form - Form is maintained by the employee organizing the Raffle/Lucky Draw as per Corporate Record Retention Guidelines - If prize is over \$1000.00+, must be entered as an HP Event within AAT.
HP Event	--	All	<ul style="list-style-type: none"> - Submit request at least two weeks in advance of issuing any invitations - Do not issue invitations until the event is approved

Commercial Sector

<u>Item</u>	<u>No Approval Required</u>	<u>Director Approval Required</u>	<u>Additional Information</u>
Gifts & Meals or Entertainment	\$0 - \$200	\$200.01 +	<ul style="list-style-type: none"> - Limited to once per quarter - Gift cards over \$200 are prohibited
Travel	--	All	
Raffle / Lucky Draw	\$0 - \$999.99	\$1000.00 +	<ul style="list-style-type: none"> - Tax forms may be required, contact your local Controllershship Office



Amenities Received by HP Employees

<u>Item</u>	<u>No Approval Required</u>	<u>Director Approval Required</u>	<u>Additional Information</u>
Gifts & Meals or Entertainment	\$0 - \$200	\$200.01 +	- Limited to once per quarter - Gift cards over \$200 are prohibited
Travel	--	All	
Raffle / Lucky Draw	\$0 - \$999.99	\$1000.00 +	- Tax forms may be required, contact your local Controllorship Office

All limits are based on the Total Value of the Business Amenity.

Exceptions

Any exception to this policy must be approved in writing by the Anti-Corruption office within Global Legal Affairs.

Definitions

- **AAT:** Amenities Approval Tool.
- **Business Amenity:** A Business Amenity can be anything of value. It can be any Gift, meal, Travel, service, prize, event ticket/pass, Entertainment, reimbursement, loan, favor, job, or item of value, whether given or received, by an HP employee, where the recipient is receiving something for free. If in doubt, please get advice from your HP attorney.
- **Cost:** The cost of an item is its open market value, for example the face value of a ticket to a concert or sporting event. When giving an HP product, it should be valued at retail price.
- **Director:** Approvals required from a "Director" means the first director in the management chain above you; if you are a director, it means your manager. If there is no director in the management chain above you, then an Executive must approve.
- **Entertainment:** An activity or meal intended to promote HP business where an HP employee is in attendance, including conference or event passes, or tickets or passes to concerts or sporting events.
- **Executive:** Leadership formerly referred to as "Vice President." Approvals required from an executive means the first executive in the management chain above you; if you are an executive, it means your manager. For the CEO and L1 executives, the General Counsel or Chief Ethics & Compliance Officer may approve.



- **Gift:** An item or service provided to someone free of charge or without payment. Gifts include gift cards, coupons, HP Products and Services, and tickets or passes to concerts and sporting events where no HP employee is in attendance.
- **HP Event:** An activity at which HP products and services will be showcased and the participants will receive any item of value. HP Events do not include ordinary business meals. Examples of HP Events include trade show events; technical workshops, seminars, lunch and learns; sales promotional account activities; demonstrations of HP products, etc.
- **Immediate Family Members:** Parents, children, spouses, siblings and in-laws.
- **Public Sector:**
 - Any entity that is owned or controlled by a government. This will include any entity where a government has greater than 50% ownership, or otherwise controls the entity. You should consult your HP attorney for a determination as to whether an entity is government-owned for purposes of this policy. In countries with government-owned or operated institutions or industries, such as health care, education, energy, telecom, banking or transportation, you should assume these entities are Public Sector.
 - Any officer or employee of a government or any department, agency, or public international organization, or any person acting in an official capacity for or on behalf of any such government or any department, agency, or public international organization;
 - Members of royal families;
 - Candidates for political office;
 - Immediate Family Members (parents, children, spouses, and in-laws), significant others, close friends, and business associates of a Public Sector employee. The United States considers public and private K-12 educational institutions and all libraries as “Public Sector” entities for the purpose of the U.S. Business Amenities Policy; and
 - Country-specific policies may define a Public Sector recipient as: Public Sector representative, government official, Public Sector official, Public Sector customer, Public Sector clients, and foreign official.
- **Raffle/Lucky Draw:** Any prize giveaway where the winner is selected by chance or by a random drawing. HP employees must not influence the selection process or direct the prize to a preferred recipient.
- **Third Party:** A non-HP party.
- **Total Value:** On a per-person, per occasion basis, all Costs including taxes, gratuities, and shipping costs unless otherwise specified in a country-specific policy. If the exact costs are unknown or cannot be reasonably



determined, you must use the fair market value to calculate the Total Value.

- **Travel:** Costs associated with travel, such as airfare, hotel accommodations, ground transportation, meals, and modest Entertainment during a trip. For Travel provided to third parties, economy class travel is required for domestic flights and international flights of less than 5 hours. Business class is allowed for international flights longer than 5 hours, if approved by the business unit funding travel and allowable under the applicable country specific rule.