
HP Norge AS Transparency Statement



We are committed to respecting human rights around the world, both in our operations and value chain, and through our business relationships. Respecting human rights requires persistence, ongoing due diligence, stakeholder engagement, and continuous improvement. This work is consistent with the core values on which our company was founded and strives to live up to each day: to create a positive, lasting, and sustainable impact on the planet, our people, and the communities where we live, work, and do business.

The Act relating to enterprises' transparency and work on fundamental human rights and decent working conditions (Norwegian Transparency Act) of 2022 requires in scope enterprises to carry out due diligence in accordance with the OECD Guidelines for Multinational Enterprises and to publish an account of this due diligence. This statement fulfills HP Norge AS' obligation to publish an account of human rights due diligence efforts during the fiscal year ending on October 31, 2022.

Section 5: Duty to Account for Due Diligence

Enterprise's Structure

HP Norge AS is a wholly owned subsidiary of Alpha Holding One BV and is a part of the HP Inc. group, one of the world's leading IT companies. HP Norge AS is registered in Norway with its headquarters in Fornebu, Norway. HP Inc. is a corporation incorporated in the state of Delaware, with principal executive offices in Palo Alto, California. HP Inc. and its consolidated subsidiaries share the same core business operations and supply chains as well as the policies, processes and risks further described in this statement. HP Inc. and its subsidiaries operate worldwide and are collectively known as HP. HP has operations in 58 countries and territories, with approximately 58,000 employees. HP's Printing business provides consumer and commercial printer hardware, supplies, services and solutions. HP's Personal Systems business provides commercial and consumer desktop and notebook personal computers (PCs), workstations, thin clients, commercial mobility devices, retail point-of-sale systems, displays and peripherals, software, support and services.

Area of Operations and Supply Chain

From PCs to printers, HP's unique products require a vast network of suppliers and partners spanning six continents and over 41 countries and territories. HP has approximately 900 manufacturing suppliers and several thousand non-manufacturing suppliers that provide goods and services in support of operations. HP discloses the names of key manufacturing suppliers on its Sustainable Impact website. HP utilizes a significant number of outsourced manufacturers around the world to manufacture HP-designed products. This helps maintain flexibility in the supply chain and manufacturing processes. In some circumstances, third-party suppliers produce products that we purchase and resell under the HP brand. HP also manufactures finished products from components and subassemblies that HP acquires from a wide range of vendors. HP has direct business relationships with suppliers that represent up to four tiers of manufacturing, including materials, components, sub-assemblies, branded components, and final assembly suppliers. HP's operations include some manufacturing as well as design and product development, supply chain management, marketing, sales, customer support and administrative operations. HP's operations are supported by non-manufacturing suppliers that provide services and facility management.

Guidelines and Procedures

Our Policies

Human rights have long been at the heart of how HP does business, and HP has embedded responsible business conduct into the enterprise's policies. As a subsidiary of HP, all HP group policies apply to HP Norge AS. HP established its first Human Rights Policy in 2003 and has evolved it over time as its understanding and due diligence has deepened. In 2021, HP strengthened the [Human Rights Policy](#) (available in 24 languages), which advances HP's commitment to respecting human rights, engaging with rights holders, and embedding its approach throughout its business and value chain. The reinvigorated policy better reflects the breadth and depth of HP's commitment to respecting human rights in accordance with the UN Guiding Principles on Business and Human Rights (UNGPs).

Additional policies and practices have been developed to reinforce HP's commitment to respect human rights, such as HP's Contingent Worker Code of Conduct. This policy is applicable to all non-employees ("contingent workers") performing services for HP at an HP site, or an alternate work location such as a home office, HP customer site, or other designated HP workplace and all suppliers of contingent workers to HP. It is also applicable to HP personnel managing the contracts and assignment of contingent workers. HP expects contingent workers and suppliers of contingent workers to share its commitment to conducting business with integrity. For example, this code prohibits unlawful discrimination, harassment, charging applicant or recruiting fees, as well as interference with identity documents or passports or contingent workers' ability to resign at any time (all local country legislation and Workers Council Agreements apply). Suppliers of contingent workers and contingent workers themselves are prohibited from engaging in trafficking in persons. Suppliers of contingent workers shall respect the right of their employees to organize in labor unions and collectively bargain in accordance with local laws and established practices.

Foreign migrant workers are especially at risk for exploitative labor practices and forced labor. HP was the first technology company to set requirements for suppliers on how they recruit, hire, and manage such workers. In 2015, HP published an industry-leading standard known as the Supply Chain Foreign Migrant Worker Standard to better address the risks surrounding foreign migrant workers in the supply chain. This standard requires direct employment of foreign migrant workers by our suppliers, prohibits the retention of worker passports and personal documentation, and requires the elimination of worker-paid recruitment fees.

HP's Supplier Code of Conduct (SCOC) outlines HP's expectations for contracted suppliers, incorporates international labor and human rights principles, and aligns with the Responsible Business Alliance (RBA) code of conduct. Contracted suppliers must comply with international standards and applicable laws and regulations regarding forced labor and human trafficking, as well as the SCOC. The SCOC outlines HP's commitment that workers associated with HP services and products have: (i) the right to freely chosen employment; (ii) the right, in accordance with local laws, to join labor unions on a voluntary basis, to bargain collectively and to engage in peaceful assembly; and (iii) the right to a workplace free of harassment and unlawful discrimination. The SCOC requires suppliers (and their suppliers) to acknowledge and implement the SCOC. Contracted suppliers must adopt a management system that includes monitoring supplier compliance with the SCOC.

HP has developed additional specialized policies and practices to support its human rights commitments, including policies relating to environmental sustainability, responsible mineral sourcing, diversity, equity and inclusion, human resources, privacy and data protection, accessibility, racial equality and supply chain responsibility.

Our Processes

HP identifies and assesses human rights risks in the supply chain, operations, and business relationships as part of HP's company-wide due diligence program, including human rights assessments and audits. The human rights due diligence program considers HP's business activities and potential risks to rights-holders, consistent with the UNGPs. HP conducts human rights risk assessments to identify potential human rights risks that could be associated with HP's business models and operations. HP considers risks in its operations (HP offices, HP manufacturing and distribution operations, and suppliers that support these operations) where it could cause or contribute to negative human rights impacts. HP also considers risks associated with its manufacturing and non-manufacturing suppliers (operating in their own facilities) where HP may be directly linked through a business relationship. HP prioritizes risks based on salience, focusing on those risks where there is the highest risk of a severe negative impact that HP may cause or contribute to, or may be directly linked through a business relationship.

Risks of adverse impacts

In HP's most recent human rights risk assessment, which was completed in 2022 in partnership with external human rights experts, modern slavery, child labor, discrimination, security of the person, health and safety, and privacy were identified as salient human rights risks. The process also included reviewing common stakeholder concerns across the IT sector by engaging with potentially affected stakeholders and civil society

organizations, as well as reviewing policies and procedures with reference to both proposed human rights laws and to how HP's voluntary commitments align to the UNGPs and the UN Sustainable Development Goals.

Measures implemented

HP has implemented measures to mitigate actual or potential risks of adverse impacts. HP maintains human rights standards (HP Supplier Code of Conduct and Partner Code of Conduct) for our business partners and delivers capability building programs to our suppliers and service providers to facilitate their adherence to these standards. HP requires through contractual and other arrangements, that partners, suppliers and other business relationships demonstrate respect for human rights and cascade this requirement through their respective supply chains. HP requires that business partners comply with all applicable laws, regulations and international standards relating to human rights (including minimum wage, maximum working hours, the prevention of forced, bonded or indentured labor, involuntary or prison labor, slavery or trafficking of persons and child labor, and protection of human rights defenders), and provide evidence of compliance with all such laws, regulations and standards upon reasonable written notice.

HP requires that our contracted business partners conduct human rights due diligence with their partners, and cooperate in mitigation and remedy when needed, and provide evidence of their human rights due diligence upon reasonable prior written notice. HP requires our suppliers and service providers work to ensure that no worker pays for any recruitment-related or job on-boarding fees and that no personal documentation is retained from workers. HP evaluates suppliers and service providers with the aim of selecting and retaining those whose policies and practices align with our human rights standards. HP periodically increases expectations of suppliers, encouraging suppliers' continuous improvement. Additionally, in 2021 HP adopted version 7.0 of the RBA Code of Conduct, which includes requirements related to worker voice and training, pregnant and nursing women, process chemicals, and water management.

HP establishes measurable and transparent indicators to assess implementation of policy and process, drawing on internal and external sources and feedback from individuals and communities. Throughout the tracking, monitoring and evaluation process, HP engages and seeks feedback from affected stakeholders. HP communicates openly with workers and management in the supply chain to identify and understand workers' questions, concerns, and priorities. HP trains its procurement teams, supplier managers, and other employees to be vigilant and report instances of practices that violate HP standards. To help address risk, if any nonconformances are identified during the supplier audit process, HP requires suppliers to provide a detailed corrective action plan addressing all identified nonconformances within 30 days of receipt of the site audit report (except immediate priority findings, which are addressed expeditiously), and has processes in place to monitor progress and subsequent closure of nonconformances. In 2022, HP focused on building communication channels to provide additional opportunities for more extensive worker feedback that will inform future human rights initiatives.

HP collaborates in initiatives to provide access to effective remedy and does not obstruct access. Where HP determines that it has caused or contributed to adverse human rights impacts, HP provides for or participates in effective remediation through legitimate processes. Where HP believes it is directly linked to an adverse impact, HP expects business partners to operate their own remediation mechanism and will collaborate with them to provide access to remedy for the impacted individuals. HP prohibits retaliation against those who

choose to engage in the grievance processes to raise human rights-related concerns and expects business partners to do the same.

Section 6: Right to Information

In accordance with Section 6 of the Norway Transparency Act, any person may submit a request for information regarding how HP Norge addresses actual and potential adverse human rights impacts. In the fiscal year 2022, we received two information requests and responded in accordance with Section 7, *Enterprises' processing of requests for information*. Please submit all information requests to humanrights@hp.com.

Respecting human rights is consistent with the core values on which HP was founded and strives to live up to each day: to create a positive, lasting and sustainable impact on the planet, our people and the communities where we live, work and do business.

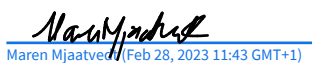
Approved on February 27, 2023 by the HP Norge AS Board of Directors.



Heli Aaltonen (Feb 28, 2023 14:52 GMT+2)

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Chairman of the Board



Maren Mjaatvedt (Feb 28, 2023 11:43 GMT+1)

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Board Member