



HP Italy S.r.l.  
Via Carlo Donat Cattin, 5  
20063 Cernusco sul  
Naviglio  
Milano  
Italia  
www.hp.com

# HP GROUP WHISTLEBLOWING POLICY – GROUP REPORTING PROCEDURE

## Introduction

Whistleblowing is the mechanism by which any stakeholder can voice their concerns, made in good faith without fear of repercussion, while reporting of offenses of which they have become aware due to an employment and/or contractual relationship with reference to what provided for by the Legislative Decree 24/2023, HP Integrity Code, HP 231 Organizational Model and any procedure in place in HP.

## Purpose

This Policy is specific to HP Italy and the purpose of this Policy is to:

ensure compliance by HP Italy Srl with the D. LGS 24/2023 (the so-called Italian Whistleblowing Regime) and encourage reporting of compliance concerns by all eligible whistleblowers, as defined in the Italian Whistleblowing Regime.

The Policy also applies to anonymous reports, where these are adequately detailed, i.e. where they are able to bring out facts and situations by relating them to specific contexts.

## Policy

### 1. Policy Statement

HP Italy is committed to conducting its business in a lawful and ethical manner. HP expects and requires all HP Italy Personnel to perform their duties in a lawful and ethical manner, as required by HP's Integrity Code and Model 231.

HP may take prompt action against those who engage in improper conduct, up to and including termination.

Any eligible whistleblowers suspecting improper conduct by HP Italy Personnel or HP Italy business partners may report a complaint (Complaint) so that HP may respond to it under this Policy.



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HP is committed to affording the Complainant the benefits and protections identified in this Policy, so as to foster an open environment in which whistleblowers may come forward without fear of retribution or retaliation.

HP Italy is committed to adopting the spirit and principles of the Italian Whistleblowing Regime, and this Policy is in line with what provided for by the Legislative Decree 24/2023.

This Policy should also be read in conjunction with the [HP's Integrity Code](#) (Integrity at HP; here is the [link](#) to the publicly available HP's Integrity Code).

## 2. Whistleblower Protection

HP Italy encourages all HP Italy Personnel, HP Italy business partners and all the Eligible Whistleblowers, as defined in article 3 of the D. Lgs. 24/2023 to feel free to provide information about suspected improper conduct by HP Italy by calling the Ethics Helpline, the confidential telephone helpline (refer to Section 3) which is operated for HP by Convercent, an independent multilingual third-party service provider.

Complainants are entitled to remain anonymous when making a Complaint. If a Complainant supplies his or her details to Convercent, Convercent will not disclose them to HP Italy without the Complainant's consent, unless it is required or authorized by law. The same applies to situations when a Complainant chooses to supply his or her details to HP Italy.

HP is committed to fostering an environment in which Complainants feel free to bring forward concerns about suspected improper conduct, understanding that HP will treat them seriously and take appropriate action.

HP Italy will not tolerate HP Italy Personnel taking adverse action against Complainants, such as reprisals, retaliation or victimization and will take all reasonable measures to guard Complainants from such behavior. Complainants are encouraged to report any such behaviors if they experience them.

HP Italy will ensure that all investigations into protected disclosures are conducted in a procedurally fair and confidential manner, to ensure the fair treatment of any individuals mentioned in a Complaint raised under this Policy or to whom the Complaint relates. HP Italy will not tolerate any reprisals or threats of reprisals made against Complainants and will take appropriate steps to protect Complainants from such retaliation.



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### 3. HP Integrity Reporting

The HP Integrity Reporting tool is HP's 24-hour confidential ethics resource telephone resource, including a telephone helpline and web submission options, operated by Convercent.

A Complainant can report anonymously, identify themselves to HP or remain anonymous to HP but provide their details to Convercent. All reporting parties are provided a report number and pin, so that they can access the tool and communicate with the Investigation Team if they choose to do so.

When reporting a concern or making an allegation, a Complainant will be asked to provide as much information about the suspected violation, such as the name of the Complainant's business unit or function, organization, the name of the people involved, and other details so that HP Italy can investigate.

To further protect a Complainant's anonymity:

- call summary reports do not identify the Complainant's gender.
- calls are not tape-recorded.
- no attempts are made to identify the Complainant's telephone number through the use of "Caller ID."

Every concern or allegation is handled promptly, discretely, and professionally. HP Italy will investigate all reports of improper conduct and take appropriate action to resolve each reported matter.

### 4. Lodging a Complaint

Complaints may be oral or in writing. In each case a Complainant needs to identify the following matters:

- their name, organization and contact details (phone and address) (if a Complainant wishes to provide this information);
- nature of the Complaint;
- all relevant facts giving rise to the Complaint;
- name of the relevant HP Italy Department, Business Group or Function which is the subject of the Complaint;
- the name(s) of all HP Italy Personnel involved;
- an acknowledgement that the information a Complainant has provided: (i) is a true and accurate representation of the events which have occurred and that have led to the Complaint; and (ii) does not contain any misleading statements or omissions; and



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- whether the Complainant consents to the disclosure of their name (if provided).

Complaints can be made as follows:

**Web:**

**HP Integrity Reporting page:** Submitters may remain anonymous. Anonymous submissions will be acted on, although company action on anonymous reports may be limited by local law. In addition, we are unable to reply to an anonymous submitter if no return information is provided. Please use this link to access the form: <https://app.convercent.com/en-us/LandingPage/05a42b7d-2f20-e911-80e9-000d3ab6ebad>

**Phone:**

See details in Section 3 above. From anywhere in the world, a Complainant can call the HP Integrity Reporting Helpline – 24 hours a day, translation is available, callers may remain anonymous, except where anonymous reporting is prohibited by local law.

Direct in-country (Italy) phone line: 800.727.406

**Mail:**

HP Ethics and Compliance Office

1501 Page Mill Road Palo Alto, CA 94304

Or

**Contact the Local Integrity Team (for physical meeting)**

At  
HP Italy Srl  
Via Donat Cattin, 5  
20063 Cernusco sul Naviglio (MI)

**External reporting channel of unlawful conduct**

External Reports of unacceptable conduct in each country, local competent Authorities could activate dedicated Whistleblowing reporting channels. The European Directive 2019/1937 provides that Whistleblowers may provide information on violations using external channels, after using internal whistleblowing channels. The whistleblower can also contact the local competent Authority



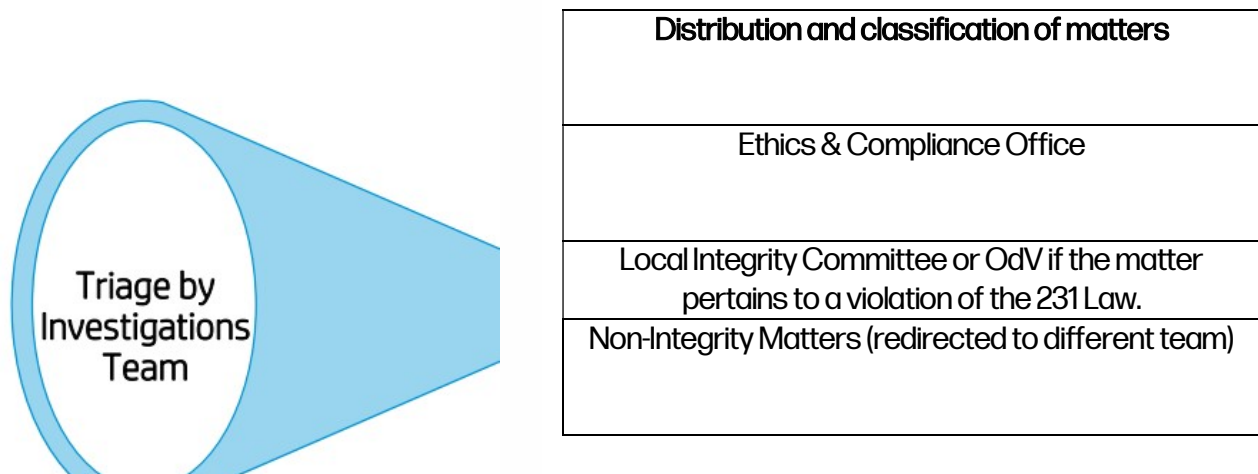
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especially when he/she considers that a Report will/is not be/being taken seriously within the Group, using the following link: [Segnalazioni di vigilanza \(anticorruzione.it\)](https://www.hp.com/Segnalazioni-di-vigilanza-anticorruzione.it)

## 5. Investigations

### 5.1. The Investigation Process

All investigations of improper conduct will be conducted in the same manner as an Integrity investigation. Integrity investigations follow a process designed to promote consistency and fairness in the conduct of investigations across the company. The investigations cycle covers a number of steps, including gathering and reviewing relevant information and interviewing those who may be able to provide information.



All Reports, both oral or in writing, will be taken into serious consideration by the Group and the Compliance function has to send an acknowledgment of receipt of the Report to the whistleblower within no more than seven days receipt.

### 5.2. The Investigation Principles

The Integrity investigation process embraces several key elements of fairness, including the following principles:



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- Independent
- Objective
- Thorough
- Professional
- Confidential
- Timely
- Cost Effective

HP Italy will aim to keep the Complainant informed of the expected timescale of the investigation. Given the nature of such investigations, HP Italy is unlikely to be able to provide specific details of the matter. All staff should treat any information about the investigation as confidential.

Once the investigation is completed, HP Italy will advise the Complainant that the matter is closed. If the Complainant has concerns about the way in which an investigation was conducted, they may raise this concern to the external channel listed in Section 4 above.

## 6. Education and Training of Employees

Information about this Policy will be provided to HP Italy Personnel as part of any ongoing Ethics and Compliance training.

## 7. Review of this Policy

This Policy will be reviewed periodically as required and may be amended from time to time.

## 8. Record keeping and data protection

These records must be stored securely by the nominated person in a material and/or electronic repository in compliance with the rules of law and the rules in force within the Group on the classification and handling of the confidential information and in compliance with relevant local laws and regulations. These records may be stored in Compliance and in any functions involved in any investigation and must be accessed only by the Employees that based on their role have to access to the records. Only information that is required to be stored by applicable local law or by internal rules of the Group Company, will be retained. The Legal Entities may establish record retention times related to the severity of the report. Personal data not useful for the processing of the report will be immediately deleted. In compliance with local law or by internal rules, whistleblower, concerned person and any witness have the right to obtain a confirmation in case there is a personal data processing regarding him/her and can therefore ask for any adjustment, integration,



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update or cancellation if the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed.