



keep reinventing

Supply chain responsibility:

Our approach

This document outlines HP Inc.'s approach to supply chain responsibility (SCR). We explain the elements of our program that form the foundation of our efforts and link to a list of our suppliers.

The mission of HP supply chain responsibility program is to protect and empower workers, and to reduce global and community environmental impacts while simultaneously creating benefits for HP and our customers. We believe this mission is complementary to our business objectives and results in a competitive advantage.

Our approach involves four interconnected elements, shown in the graphic to the left. Our **policies and standards** establish clear social and environmental responsibility (SER) requirements for our supply chain and our management system to effectively drive the development and execution of our program. The closely related elements of **sensing risk** and **addressing risk** are part of a holistic approach to identifying and mitigating SER issues, which includes awareness of geographic risks, labor trends, and other factors. To minimize the potential for supply chain-related risks, we work with suppliers and other stakeholders, focusing on empowering workers and raising standards. Our commitment to **transparency** forms a solid foundation for all of our efforts. We believe this comprehensive approach is consistent with the expectations of the UN Guiding Principles on Business and Human Rights for companies' due diligence.

Policies, standards, and management system

HP seeks to set leading supplier SER performance standards and drive supplier conformance. While we intend to align our standards and expectations with those of our industry, we also recognize that clear guidance on how to address some of the most pressing SER issues is sometimes lacking for suppliers. As these gaps are identified, HP introduces leading policy and standard updates that appropriately communicate our expectations to our suppliers. Our specific policies and standards are discussed below.

Our management system is designed to continually improve the SER performance of our supply chain.

Sensing risk

Before taking action to remediate potential or existing issues at any point in our supply chain, HP works to identify and characterize sources of risk and their context. Risks are identified at a global or regional level, and at the level of individual suppliers. We accomplish this through the following avenues:

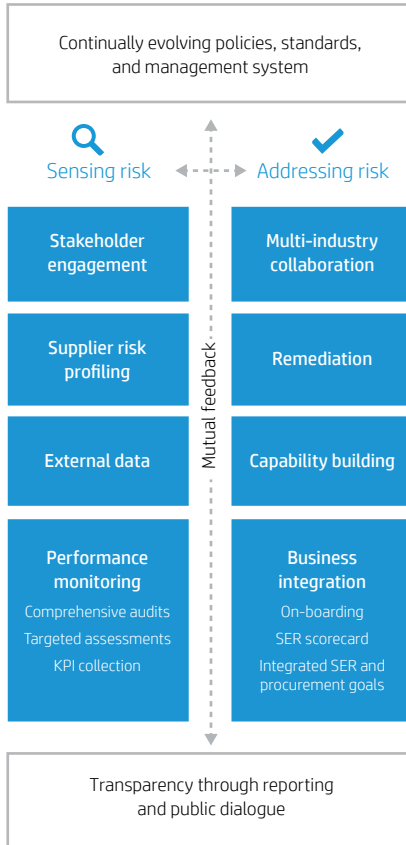
- **Stakeholder engagement** HP engages with a broad range of stakeholders including workers (through interviews, surveys, capability building programs, and our ethics concerns reporting system), industry bodies, governments, socially responsible investors (SRIs), and non-governmental organizations (NGOs) to research and better understand issues of concern regarding SER in our supply chain. Stakeholder engagement is a critical step towards coordinated and effective response to important human and environmental challenges.

HP supply chain responsibility program

Mission



Our approach



- **Supplier risk profiling** We create an ongoing risk profile of our supply base. From this we determine how to most effectively deploy resources and engage suppliers.
- **External data** We use information from a wide range of external sources to provide context for our supply chain responsibility program design. These sources include research, reports, and indices from industry groups and other resources.
- **Performance monitoring** We measure supplier performance in order to understand issues at the supplier level and identify trends across our supplier base. We track supplier issues and trends through our assurance program, which includes both comprehensive audits using HP's Supplier Code of Conduct, and focused assessments in specific high-risk areas such as use of foreign migrant workers. We also use supplier key performance indicator (KPI) monitoring, which collects data on key issues such as working hours and use of student workers.

Addressing risk

HP's risk sensing activities provide detailed information to identify and prioritize existing and emerging areas of concern in our supply chain. Our program addresses risks to workers and the environment in the following ways:

- **Multi-industry collaboration** HP works with industry peers and consortia to influence industry alignment and direction, such as general sharing of best practices, and more specific forms of collaboration, including the evolution of the RBA Code of Conduct. We also participate in multi-industry collaboration to drive and support change beyond the IT industry.
- **Remediation** Using information from sources such as audits and assessments, HP improves SER performance through activities designed to address known and potential issues at suppliers, including:
 - Defined corrective action plans with focused follow-up assurance activities
 - Escalated remediation for zero-tolerance findings and situations when effort beyond standard corrective action is needed
- **Capability building** We help suppliers improve SER performance through programs and partnerships with NGOs, training partners, governmental organizations, and suppliers focusing primarily on worker empowerment and management systems development.
- **Business integration** Our program relies on HP's procurement operations function to motivate and incentivize suppliers through ongoing relationships, including regular supplier business reviews and day-to-day engagement. Our procurement operations team is trained to undertake SER performance evaluation, education, and mentoring. As part of our onboarding process, the team evaluates key new suppliers against SER performance standards, which engages suppliers early and demonstrates the connection between SER and procurement. Once a supplier is selected for business, our procurement team includes HP SER requirements in business contracts with suppliers. Our SER scorecard directly ties ongoing procurement decisions to supplier SER performance and participation in capability building, ensuring SER is prioritized in business decisions. A supplier's SER score acts as a multiplier to its general supplier management score. This allows suppliers with strong SER performance greater opportunities for new or expanded business with HP, while suppliers with persistently low SER performance will have much lower overall scores and may see large reductions in our business.

Transparency

HP publicly reports, year-over-year, key information about our supply chain and its SER performance. We recognize that transparency is critical to engagement with stakeholders, informed decision making, creating accountability, and progress towards solutions. HP's long history of industry-leading transparency includes:

- **2005** First IT company to publish aggregated supplier audit results.
- **2008** First IT company to publish a list of suppliers. In 2014 we added details on supplier addresses, product types, and the number of hourly employees dedicated to HP production.
- **2012** Published an industry-first Student and Dispatch Worker Standard, with stakeholder input.
- **2013** First IT company to publish its complete carbon and water footprints.
- **2013** First IT company to publish its supply chain smelter list, adding to the dialogue between companies and stakeholders on conflict minerals.
- **2014** Published an industry-leading Supply Chain Foreign Migrant Worker standard, developed in collaboration with Verité.

Over the years we have achieved significant benefits from our proactive transparency. For example, since 2008, we have measured and disclosed HP's supply chain greenhouse gas (GHG) emissions, which in turn helped us to establish and publish the industry's first supply chain GHG goal in 2013. Our commitment to transparent pursuit of this goal motivates us to continually work with supply chain partners to reduce emissions. This in turn helps our suppliers save money on energy costs, and opens up opportunities for dialogue with and recognition from stakeholders such as CDP.

Our evolving approach

We continually revise our supply chain responsibility program, founded in 2001, to better realize our goals. This approach includes responding to situations that are beyond the traditional sphere of influence of our program. Conflict minerals is one such issue, as it relates to suppliers many tiers deep in our supply chain. While many aspects of our traditional approach to supply chain SER management — such as risk assessment and the propagation of process expectations to tiers beyond our direct suppliers — are part of our approach to conflict minerals, we also work to influence specific activities deeper in our supply chain — such as validation of smelters as conflict free.

Regardless of the exact form our engagement with suppliers takes, HP's vision is for a sustainable supply chain, with empowered partners who own and prioritize the well-being of the people, communities, and environment around them. We have been working toward this vision since founding our Supply Chain Responsibility program in 2001 and before.

Policies and standards

International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work

HP's Supply Chain Responsibility program promotes the core labor standards as stated in the ILO Declaration on Fundamental Principles and Rights at Work (1998):

- Freedom of association and the effective recognition of the right to collective bargaining
- Elimination of all forms of forced or compulsory labor
- Effective abolition of child labor
- Elimination of discrimination in respect to employment and occupation

HP's Supplier Code of Conduct

Our highest level of supplier SER requirements is HP's [Supplier Code of Conduct](#), which is based upon the Responsible Business Alliance (RBA) (formerly Electronic Industry Citizenship Coalition) Code of Conduct, the standard applied across the industry's global supply chain. In 2004, we co-led the development of the RBA Code of Conduct. HP endorses the RBA code in its entirety, and we have worked over the years to refine and expand it to best support workers' rights and protect the environment. To further achieve these goals, HP has augmented our Supplier Code of Conduct to provide additional specificity on our requirements for the management of vulnerable worker groups, requirements for substances used in products and production processes, and product recycling and reuse. These associated standards are described below.

We require all suppliers of HP goods and services to conform to the HP [Supplier Code of Conduct](#). Furthermore, our suppliers must pass on these requirements to their next tier suppliers and monitor compliance.

Student and Dispatch Worker Standard

In response to the growing focus on responsible student worker management in the electronics industry supply chain, HP developed specific student and dispatch worker standard for supplier facilities in China. Complementing the HP Supplier Code of Conduct, this industry-leading initiative was communicated to suppliers in February 2013.

Foreign Migrant Worker Standard

To address the vulnerable position of migrant workers traveling to foreign countries for work, in November 2014 HP implemented a standard requiring direct employment of foreign migrant workers in its supply chain, as well as prohibiting retention of worker passports and personal documentation and the elimination of worker-paid recruitment fees. This standard complements HP's Supplier Code of Conduct.

HP General Specification for the Environment

HP's [General Specification for the Environment \(GSE\)](#) defines substance and materials requirements used in HP products, packaging, and manufacturing processes.

We require all suppliers to conform to HP's [Supplier Code of Conduct](#) and comply with our GSE, which includes substance and materials requirements for parts and components that are used in HP products, packaging, and manufacturing processes.

HP Reuse and recycling

HP's reuse and recycling standards define requirements for transportation, treatment, and disposal of IT hardware and printing supplies on our behalf. We require suppliers to operate ethically and with respect for the environment and human health and safety. The goal is to maximize reuse and recycling, minimize waste, and ensure information security. Suppliers must commit to conformance with HP standards and applicable laws, and demonstrate management systems to ensure success.

Supplier SER development

HP's four phases of SER supplier development (see graphic below) provide a framework for engagement through our supply chain responsibility program. We focus our resources according to identified risks posed by supplier activities, and aim to improve long-term SER performance by building suppliers' capabilities through sustained, long-term engagement. Since our Supply Chain Responsibility program began, all of our key production suppliers have completed the *Assessment and Positioning for engagement* phases. We primarily focus our SER engagement on first-tier suppliers, those with which HP has a direct contractual relationship. However, when we identify specific risks or opportunity to have a significant impact, we may also engage suppliers deeper in our supply chain.

Because HP works to identify and address SER risks at many levels, we are able to tailor our engagement to the specific needs of individual suppliers. Some suppliers may present greater risk for poor SER performance, and therefore necessitate greater engagement on our part. As new risks are detected we are able to pull appropriately from our toolkit or — when the opportunity arises — to develop new tools.

The graphic on the next page illustrates the number of suppliers achieving HP's phases of SER supplier development through 2015. The difference between numbers of suppliers reaching the *Assessment and Positioning for engagement* phases represents supplier sites that pose low risk. The difference between numbers of suppliers reaching the *Positioning for engagement* and *Monitoring and improvement* phases represents sites whose self-assessments indicate they are low risk. The increases in *Assessment and Positioning for engagement* starting in 2009 and 2010 are largely due to the expansion of our program to non production suppliers. The following pages explain each of our four phases of supplier development.

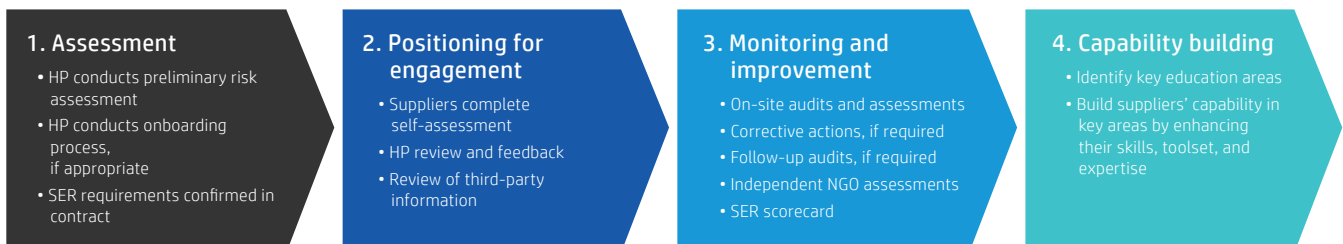
Phase 1: Assessment

HP considers supplier risk profiles and conducts a formal preliminary risk assessment, if necessary. Key suppliers may then undergo site-based onboarding assessments to determine if they are capable of acceptable SER performance prior to doing business. This motivates suppliers to emphasize SER performance, and ensures SER engagement from the onset of the business relationship. We confirm our SER requirements in our contract with suppliers.

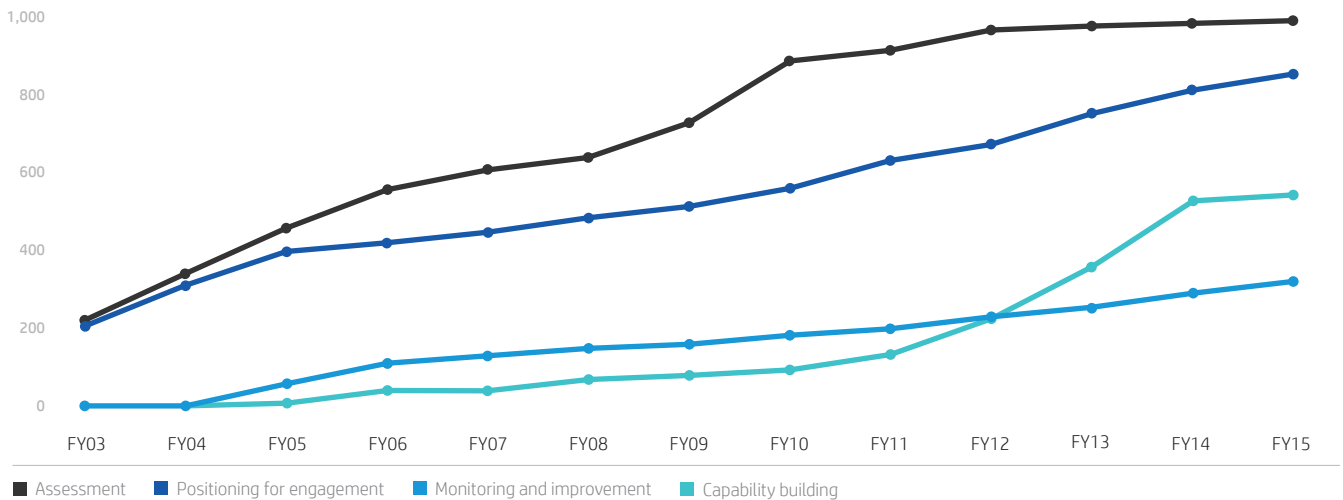
We assess the following risk factors:

- **Location Risk** is higher in some locations than others.
- **Procurement category Risk** is higher in some procurement categories, as determined by the type of activity carried out by the supplier and the association to the HP brand. High-risk categories include: manufacturing and assembly of parts/components, call centers, warranty/break fix, reuse/recycling, and branded merchandise. Lower risk categories include: consultancy, outsourced financial services, and software licensing
- **Supplier-specific factors** These include: workforce composition, past performance, nature of business relationship with HP, and volume of business. Insight from previous audits, press articles, incidents, or accidents may also affect our assessment of supplier risk.
- **External stakeholder reports** We consider information highlighted in NGO and other external stakeholder reports and determine whether action is required.

Four phases of supplier SER development



Number of suppliers reaching each phase, cumulative



Phase 2: Positioning for engagement

To most effectively use our resources, HP prioritizes and plans our engagement with suppliers. If HP's risk assessments show a supplier poses a medium or higher social and environmental risk, it must complete a [self-assessment questionnaire](#). This helps us identify potential SER performance risks and helps suppliers understand our expectations for conformance to HP's [Supplier Code of Conduct](#). HP reviews and provides feedback on the self-assessment, and suppliers create and implement an improvement plan, if required. We also use the supplier self-assessment, our previous risk assessment, and various 3rd-party information sources to determine how best to engage the supplier—in terms of monitoring and capability building—to ensure adequate and improving SER performance.

Phase 3: Monitoring and improvement

Monitoring conformance

HP currently uses a mix of local internal auditing teams and third-party audits, backed by independent quality verification. We are increasing the independence, transparency, and supplier ownership of these audits (see Audit strategy, below).

We use three types of on-site audits:

- Audits conducted by trained and certified HP employees.
- Joint audits conducted by an external organization on behalf of HP and other RBA member companies. This auditing methodology—the Validated Audit Process (VAP)—was launched in 2010 to eliminate duplication and promote audit sharing by providing a common auditing approach among companies. We encourage our suppliers to use the VAP as an independent assessment of their performance.
- Audits conducted by an external organization to verify the results of HP audits or to independently investigate allegations.

In addition to comprehensive audits, we target specific risks through focused assessments covering areas including:

- Vulnerable worker groups such as student, dispatch, and foreign migrant workers
- Health and safety, focusing on fire safety and emergency preparedness
- Supplier SER management system readiness as measured by the SAI Social Fingerprint Assessment
- Supplier environmental performance, benchmarked against best practices using the GSCP Environmental Reference Tools

Supplier audit performance is rated on the SER Scorecard using a five-tier scale. The rating acts as a modifier to the general supplier management score. Suppliers with strong SER performance improve their opportunities for new or expanded business. Suppliers with poor SER performance risk a reduction in the business they are awarded.

Responding to nonconformance

We rank levels of nonconformance to HP's Supplier Code of Conduct as "major" and "minor" using International Standards Organization (ISO) guidelines.

A nonconformance does not necessarily mean a violation has been found. It could mean there are insufficient management systems in place to prevent violations from occurring.

Major nonconformance A major nonconformance is a significant failure in the management system that affects a company's ability to ensure that conditions conform to HP's Supplier Code of Conduct or General Specification for the Environment. For example, a site may not have implemented a required standard, or 20% or more of workers are not aware that such a standard exists. Suppliers must demonstrate that they have addressed major nonconformances within 180 days by delivering appropriate documentation or other evidence of resolution.

Zero-tolerance items are the most serious type of major nonconformance. Examples include child labor, forced labor, health and safety issues posing immediate danger to life or risk of serious injury, and perceived violation of environmental laws posing serious and immediate harm to the community. Our zero-tolerance policy requires auditors to escalate such items immediately.

Suppliers must rectify these items no later than 30 days after the original audit. HP then reexamines the zero-tolerance item between 30 and 90 days after the audit with an in-person visual verification to confirm resolution of the issue. Zero-tolerance items also result in suppliers being downgraded in our SER scorecards and either a reduction or elimination of business if both the zero-tolerance item and the underlying management system deficiencies are not addressed.

Minor nonconformance A minor nonconformance is not a systemic problem and typically an isolated finding from an internal audit or a procedure that has not been revised to reflect a change in regulations. This could include, for example, an out-of-date record or an overdue procedure that has not been updated. Suppliers have up to 360 days to address minor nonconformances.

Corrective action plans HP requires suppliers to provide a detailed corrective action plan addressing all identified nonconformances (except zero-tolerance items, which are treated independently) within 30 days of receipt of the site audit report. We review these plans and request quarterly reports to monitor progress and subsequent closure of nonconformances. We also conduct follow-up audits to ensure all nonconformances are closed. When progress is inadequate, we intervene to help create a more effective plan.

Phase 4: Capability building

Remaining engaged with suppliers and providing support is as important to our program as uncovering problems. In conjunction with local and international NGOs and training groups, our capability-building programs include collaboration with suppliers on key drivers of SER performance improvement, such as worker empowerment and SER management system development. In addition, our varied, independent assessments are often paired with capability-building opportunities to help the supplier through improvement planning.

If a supplier rejects the continual improvement approach, we emphasize that we will not tolerate serious or repeated violations of HP's Supplier Code of Conduct and will terminate the relationship if needed. Terminating a contract can mean the loss of jobs, so we prefer to collaborate with suppliers to improve SER performance where possible.

HP's investment in capability-building programs addresses the most critical supply chain SER issues, as identified by audit trends, external stakeholder input, and other intelligence.

Audit strategy

We monitor the SER performance of suppliers through self-assessments, HP and/or third-party audits, risk-specific on-site assessments, and monthly collection of KPI data.

Supplier audits provide the broadest measurement of conformance with HP's [Supplier Code of Conduct](#) and are used to establish whether the supplier has systems in place to facilitate continued conformance. We perform these audits based on [RBA tools](#). Audits enable HP to identify pressing issues and build corrective action plans with suppliers to address those issues, as well as help us to prioritize issues to cover in our capability-building programs.

We understand that auditing is not a means to sustained supplier performance, but it is an important measurement tool to receive continual feedback on the effectiveness of our leading policies and standards, as well as our innovative capability-building programs and trainings.

As part of our vision for a sustainable supply chain, we utilize third-party audits based on HP's Supplier Code of Conduct. In addition we target specific risks uncovered through audits, KPIs, and external stakeholder feedback through focused assessments (described above in Supplier SER development, *Phase 3: Monitoring and improvement*).

Collaborative audits

Achieving suppliers' cooperation is essential to creating lasting improvements. We usually announce audits in advance and conduct them in the presence of facility management. Although this could allow suppliers to present an artificially positive picture, skilled local auditors speaking the native language of the region and our robust audit methodology provide reasonable safeguards against suppliers hiding issues, and we believe this level of collaboration is an important aspect of building capabilities and helping management understand the issues.

Announcing audits also contributes to building and maintaining strong relationships. Unannounced investigative audits are an exception. We use these in response to serious, credible allegations. We consider the falsification of records to be a zero-tolerance item that may negatively impact a supplier's business with HP through the SER scorecard system.

Building suppliers' audit capabilities

We monitor and partner with our suppliers to improve their ability to audit their own suppliers. These partnerships forge a better understanding of the requirements and processes needed to resolve issues while encouraging greater ownership of the audit results and of overall performance. This type of collaboration also enables HP's Supplier Code of Conduct to be monitored more effectively at lower levels of the supply chain.

By building suppliers' internal audit competencies, we allow our auditors to focus more on capability building. All of our lead auditors have been trained as SER consultants, helping suppliers improve performance and strengthen their SER management systems.

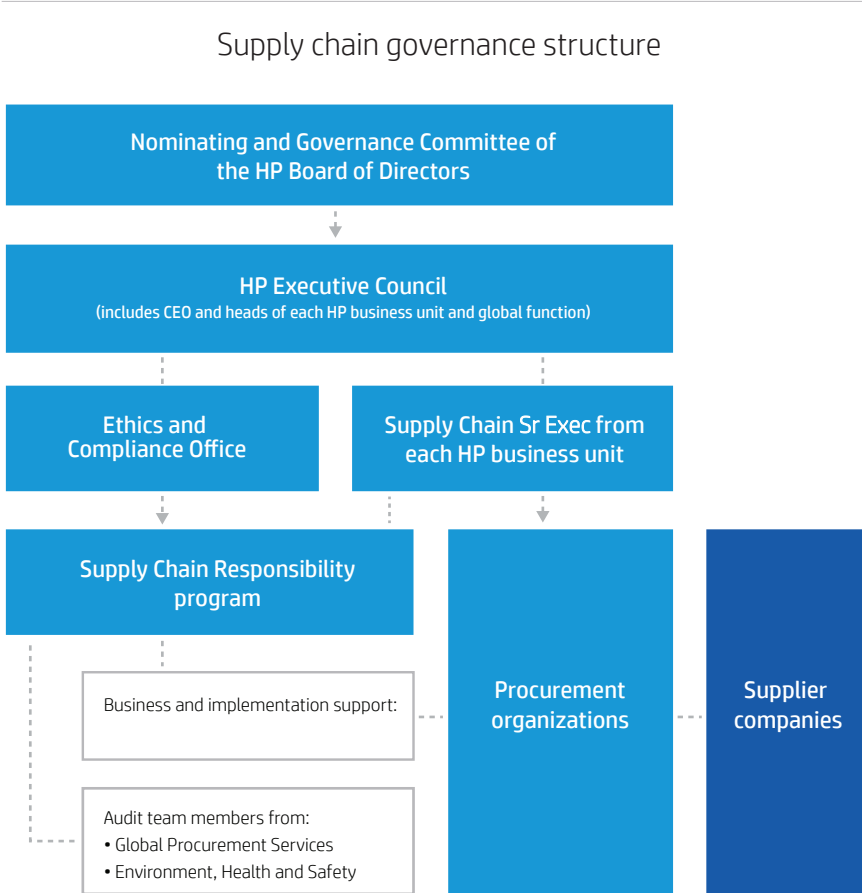
Internal collaboration and governance

Our supply chain responsibility governance system defines responsibility and reporting across HP businesses and functions. All HP businesses support our program through their respective Supply Chain senior executives who report directly to the HP Executive Council (see graphic below).

Collaborating to accelerate progress

The larger electronics manufacturers typically supply numerous major brands. In the IT supply chain many companies are both suppliers to and customers of each other.

Electronics manufacturers and brands therefore benefit from collaboration. It allows them to share best practices and resources, standardize tools and processes, avoid duplication, and develop consistent approaches to improving SER performance. Suppliers' appreciation of strong SER performance is heightened when they receive a consistent message from many of their customers.



HP shares our experiences and learns from those of companies inside and outside of our industry.

Supplier list

HP was the first electronics company to publish a list of suppliers. The list first appeared in our 2007 Global Citizenship Report. Our current list covers 95% of first-tier production suppliers (by spend). It includes information about their sustainability programs and the number of reported hourly employees dedicated to the production of HP products at our final assembly sites. Also disclosed are factory address and product type information for final assembly suppliers. View a [list](#) of production suppliers.

