

**Company Name** HP  
**Industry** ICT (Supply Chain only)  
**UNGP Core Score (\*)** 17.0 out of 26

Score	Out of	For indicators
<b>Governance and Policy Commitments</b>		
2	2	A.1.1 Commitment to respect human rights
0.5	2	A.1.2 Commitment to respect the human rights of workers
1	2	A.1.4 Commitment to engage with stakeholders
1	2	A.1.5 Commitment to remedy
<b>Embedding respect and Human Rights Due Diligence</b>		
Embedding respect		
2	2	B.1.1 Embedding - Responsibility and resources for day-to-day human rights functions
Human Rights Due Diligence (HRDD)		
1.5	2	B.2.1 HRDD - Identifying: Processes and triggers for identifying human rights risks and impacts
1	2	B.2.2 HRDD - Assessing: Assessment of risks and impacts identified (salient risks and key industry risks)
2	2	B.2.3 HRDD - Integrating and Acting: Integrating assessment findings internally and taking appropriate action
0	2	B.2.4 HRDD - Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts
0.5	2	B.2.5 HRDD - Reporting: Accounting for how human rights impacts are addressed
<b>Remedies and Grievance Mechanisms</b>		
1.5	2	C.1 Grievance channels/mechanisms to receive complaints or concerns from workers
2	2	C.2 Grievance channels/mechanisms to receive complaints or concerns from external individuals and communities
2	2	C.7 Remedying adverse impacts and incorporating lessons learned
<b>17.0</b>	<b>26</b>	

(\*) Instead of the full list of indicators in the 2020 CHRB Methodology, this year's assessment uses the CHRB Core UNGP Indicators. These are 13 non-industry specific indicators that focus on three key areas of the UNGPs: high level commitments, human rights due diligence and access to remedy.

The 13 indicators selected from the full CHRB Methodology are scored on a simple unweighted basis, with a maximum of 2 points for each indicator for a maximum total of 26 points.

In addition, allegations of severe human rights impacts (Measurement Theme E) were also assessed but do not impact overall final scores

Please note that the "Not met" labels in the Explanation boxes below do not necessarily mean that the company does not meet the requirements as they are described in the bullet point short text. Rather, it means that the analysts could not find information *in public sources* that met the requirements *as described in full* in the CHRB 2020 Methodology document. For example, a "Not met" under "General HRs Commitment", which is the first bullet point for indicator A.1.1, does not necessarily mean that the company does not have a general commitment to human rights. Rather, it means that the CHRB could not identify a public statement of policy in which the company commits to respecting human rights.

## Detailed assessment

### Governance and Policies

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.1	Commitment to respect human rights	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: General HRs commitment: In its Human Rights Policy, the Company states: 'Respecting human rights is embedded in the way we do business. We believe respect for human rights is integral to advancing sustainability, and therefore we have chosen to express our policy commitment to respecting human rights in this Policy' [Sustainable Impact and Human Rights Policy, 2019: <a href="http://www8.hp.com">www8.hp.com</a>]</li> <li>• Met: UNGC principles 1 &amp; 2: The Company is signatory of the UN Global Compact. [Sustainable Impact and Human Rights Policy, 2019: <a href="http://www8.hp.com">www8.hp.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: UNGPs: The Company indicates that: 'HP strives to uphold the relevant fundamental rights and freedoms of all people across our business, in line with [...][ the UN Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises'. Furthermore, in its Human Rights Report, the Company states: 'HP respects the human rights defined in the following instruments: [...]; The UN Guiding Principles on Business and Human Rights (UNGPs); [...]' [Sustainable Impact and Human Rights Policy, 2019: <a href="http://www8.hp.com">www8.hp.com</a> &amp; Human Rights Progress Report 2019, N/A: <a href="http://h20195.www2.hp.com">h20195.www2.hp.com</a>]</li> </ul>
A.1.2	Commitment to respect the human rights of workers	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: ILO Core: In its Human Rights Policy the Company includes provisions covering all ILO core, such as: 'HP is committed to taking action against human trafficking, child labor and forced labor in our operations and supply chain.'; 'HP respects the right of employees to organize in labor unions and collectively bargain in accordance with local laws and established practices.'; 'HP is committed to maintain a work environment free from discrimination and harassment, one where employees are treated with dignity and respect.' The Company has a specific policy with respect Non discrimination. However, it is not clear whether the Company's commitment to freedom of association and collective bargaining covers all contexts as it clarifies that is respected 'in accordance with local laws and established practices'. [Sustainable Impact and Human Rights Policy, 2019: <a href="http://www8.hp.com">www8.hp.com</a> &amp; Nondiscrimination Policy (Website), N/A: <a href="http://hp.com">hp.com</a>]</li> <li>• Met: UNGC principles 3-6 [Un Global Compact, N/A: <a href="http://unglobalcompact.org">unglobalcompact.org</a>]</li> <li>• Not met: Explicitly list ALL four ILO for ICT suppliers: Its Supplier Code of Conduct includes provisions covering all ILO core, such as: 'Forced, bonded (including debt bonded) or indentured labor'. 'Child labor is not to be used in any stage of manufacturing or in the provision of services or supplies.'; 'Suppliers should be committed to a workforce free of harassment and unlawful discrimination. Companies shall not engage in discrimination based on race, color, age, gender, [...] or marital status in hiring and employment practices such as wages, promotions, rewards, and access to training.'; 'In conformance with local law, suppliers shall respect the right of all workers to form and join trade unions, of their own choosing, to bargain collectively and to engage in peaceful assembly as well as respect the right of workers to refrain from such activities.' However, it is not clear whether the Company is requiring to respecting those rights in all contexts, as it indicates 'in conformance with local law' (i.e. alternative mechanisms for those countries where there are legal restrictions to the exercise of these rights). [Supplier Code of Conduct, 08/2018: <a href="http://h20195.www2.hp.com">h20195.www2.hp.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Explicit commitment to All four ILO Core: See above [Sustainable Impact and Human Rights Policy, 2019: <a href="http://www8.hp.com">www8.hp.com</a> &amp; Nondiscrimination Policy (Website), N/A: <a href="http://hp.com">hp.com</a>]</li> <li>• Met: Respect H&amp;S of workers: In its Human Rights Policy, the Company states: 'HP is committed to [...] to conducting our operations in an environmentally</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>responsible manner and to leading our business in a manner that ensures the health, safety, and security of our workforce, our workplaces, and the protection of our brand, products, reputation, and assets.' [Sustainable Impact and Human Rights Policy, 2019: <a href="http://www8.hp.com">www8.hp.com</a>]</p> <ul style="list-style-type: none"> <li>• Met: H&amp;S applies to ICT suppliers: The Company's Supplier Code include provisions with respect Health and Safety, including the following topics: Occupational Safety, Emergency Preparedness, Occupational Injury and Illness, Industrial Hygiene, Food, Sanitation and Housing among others. [Supplier Code of Conduct, 08/2018: <a href="http://h20195.www2.hp.com">h20195.www2.hp.com</a>]</li> <li>• Not met: working hours for workers: According to its Sustainable Impact and Human Rights Policy 'HP is committed to complying with applicable wage and hours laws and will generally pay employees regularly and at intervals not exceeding one month'; No further details found on working hours. [Sustainable Impact and Human Rights Policy, 2019: <a href="http://www8.hp.com">www8.hp.com</a>]</li> <li>• Not met: Working hours for ICT suppliers: In addition, its Supplier Code of Conduct indicates: 'a workweek should not be more than 60 hours per week, including overtime, except in emergency or unusual situations. Workers shall be allowed at least one day off every seven-day week'. However, no evidence found of references to standard weekly hours or the Company explicitly committing to respect ILO conventions on working hours. [Supplier Code of Conduct, 08/2018: <a href="http://h20195.www2.hp.com">h20195.www2.hp.com</a>]</li> </ul>
A.1.4	Commitment to engage with stakeholders	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Regular stakeholder engagement: In its Sustainable Impact Report, the Company states: 'We gain valuable insight through our regular engagement with a range of stakeholders—including employees, investors, suppliers, customers, peer companies, public policymakers, industry bodies, nongovernmental organizations (NGOs), sector experts, and others. [...] Individual functions across the company drive our decentralized approach, engaging in ways that are most relevant to their objectives and operations. These include partnerships, sponsorships, collaboration on industry initiatives, customer and supplier education, supplier capability-building programs, supplier audits and assessments, conference participation, employee surveys, mentoring, and more'. In its SI Report 2018, the Company reports in relation to its employee survey 2018, engagement with workers in the supply chain (women in factories), etc. [Sustainable Impact Report 2019, 05/2020: <a href="http://h20195.www2.hp.com">h20195.www2.hp.com</a> &amp; 2018 Sustainability Impact Report, 05/2019: <a href="http://h20195.www2.hp.com">h20195.www2.hp.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Commits to engage stakeholders in design</li> <li>• Not met: Regular stakeholder design engagement: The Company indicates that 'We collaborate with a range of stakeholders to ensure that our commitment to environmental and social responsibility, and our expectations around ethical business conduct, are applied across our value chain, from sourcing and manufacturing, to HP's own operations, to product use, repair, reuse, and recovery.' However, there is no further evidence on how the Company is engaging potentially and actually affected stakeholders in the design or monitoring of the human rights approach. No new relevant evidence found in latest report. [2017 Sustainable Impact Report, 06/2018: <a href="http://www8.hp.com">www8.hp.com</a>]</li> </ul>
A.1.5	Commitment to remedy	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Commits to remedy: In its Human Rights Policy, the Company states: 'Sustainable impact at HP is based on the following principled commitments: [...] Conduct due diligence to avoid complicity in human rights violations and cooperate in access to remediation for those impacted; Promptly investigate allegations and pursue action to mitigate any adverse impac [Sustainable Impact and Human Rights Policy, 2019: <a href="http://www8.hp.com">www8.hp.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Not obstructing access to other remedies</li> <li>• Not met: Collaborating with other remedy initiatives</li> <li>• Not met: Work with ICT suppliers to remedy impacts: The Company reports in its MSA Statement 2019: 'Eight suppliers were found to have indicators of modern slavery, including charging of recruitment fees and one also had passport and personal document withholding. Two of these suppliers (a manufacturing supplier and a sub-supplier to one of our direct suppliers) were also associated with media reports raising possible indicators of modern slavery. We required the issues to be immediately addressed and worked with the suppliers to provide remedy to the workers and implement corrective actions to adjust their management systems'. However, no details found on how it worked with them, or a specific commitment</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			to cooperate with suppliers in providing remedy including either through suppliers own mechanisms, or through the development of third party non-judicial mechanisms. [MSA Statement 2019, 2020: <a href="http://www8.hp.com">www8.hp.com</a> ]

## Embedding Respect and Human Rights Due Diligence

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.1	Responsibility and resources for day-to-day human rights functions	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Commits to ILO core conventions: See indicator A.1.2. Commitment to Global Compact.</li> <li>• Met: Senior responsibility for HR: The Company indicates: 'The Human Rights Office then works with our local senior management team, in consultation with the boards of our subsidiary entities, as appropriate, to develop, adopt, and approve statements that are responsive to local requirements. HP's Chief Supply Chain Officer oversees implementation of our human rights commitments (found within our Sustainable Impact and Human Rights Policy) and the design of processes to prevent, mitigate, and remediate related impacts, including any relating to modern slavery and human trafficking.' [Sustainable Impact Report 2019, 05/2020: <a href="http://h20195.www2.hp.com">h20195.www2.hp.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Day-to-day responsibility: In addition to the explanation above, the Company indicates in its Human Rights Report: '[...] the Privacy Office and the Ethics and Compliance Office (which owns the company's grievance mechanism); and Strategy and Business Management includes management and due diligence of our non-manufacturing suppliers, and our facilities management.' In addition, its SI Report 2018 reads: 'Ethics and Compliance Office (within Global Legal Affairs) Manages ethical issues across our global operations. Specific responsibilities include oversight of Integrity at HP, coordination of the company's Compliance Assessment Program, management of anti-corruption and privacy, and the design and management of processes that prevent, mitigate, and remediate all related business impacts'. [2018 Sustainability Impact Report, 05/2019: <a href="http://h20195.www2.hp.com">h20195.www2.hp.com</a> &amp; Human Rights Progress Report 2019, N/A: <a href="http://h20195.www2.hp.com">h20195.www2.hp.com</a>]</li> <li>• Met: Day-to-day responsibility for ICT in supply chain: Furthermore, in its 'Supply Chain: our approach' document, the Company indicates that its 'Supply Chain Responsibility Program' depends on the Ethics and Compliance Office and the Supply Chain Sr. VPs from each HP business unit. [Supply Chain Responsibility: Our Approach, 2016: <a href="http://www8.hp.com">www8.hp.com</a>]</li> </ul>
B.2.1	Identifying: Processes and triggers for identifying human rights risks and impacts	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Identifying risks in own operations: According to its Human Rights Report: 'Due diligence for HP is a systematic process to address actual and potential adverse impacts in operations, supply chain, and in our business model, in relation to customers, community members, workers, and other rights holders. It is a risk-based assessment that is commensurate with the severity and likelihood of adverse impacts. [...] Since 2011, we have regularly conducted internal human rights impact assessments (HRIA) to take stock of actual and potential human rights risks across our business. Our approach is to: Identify and engage relevant business functions that have the potential for human rights risks, followed by a review of those functions to assess the types of rights holders that may be impacted; Compare potential and actual risks of rights holders served by the function against the rights described by the UDHR – enabling us to uncover new or emerging risks that have not previously been identified. We characterize risk based on scope, likelihood, severity, and difficulty to remediate the impact. We consider risks salient based on the combination of likelihood, severity, and difficulty to remediate'. In addition, in its Sustainable Impact Report, the Company states: 'During 2019, we evaluated seven global corporate functions that have a role in respecting the human rights of workers against the UDHR, to identify salient risks across our value chain. These risks were further evaluated against HP's policies, processes, and practices to determine any gaps. This process was informed by desk research related to the industry, as well as interviews with internal and external leaders. The assessment highlighted several salient risks that we are now addressing through our human rights program'. [Sustainable Impact Report 2019, 05/2020: <a href="http://h20195.www2.hp.com">h20195.www2.hp.com</a> &amp; Human Rights Progress Report 2019, N/A: <a href="http://h20195.www2.hp.com">h20195.www2.hp.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Met: Identifying risks in ICT suppliers: As indicates above, the Company indicates: 'Due diligence for HP is a systematic process to address actual and potential adverse impacts in operations, supply chain, and in our business model, in relation to customers, community members, workers, and other rights holders'. [Human Rights Progress Report 2019, N/A: <a href="https://www2.hp.com/h20195">h20195.www2.hp.com</a>]</li> <li>Score 2</li> <li>• Met: Ongoing global risk identification: As indicated above, the Company states: 'Since 2011, we have regularly conducted internal human rights impact assessments (HRIA) to take stock of actual and potential human rights risks across our business'. [Human Rights Progress Report 2019, N/A: <a href="https://www2.hp.com/h20195">h20195.www2.hp.com</a>]</li> <li>• Not met: In consultation with stakeholders: The Company indicates that 'This process was informed by desk research related to the industry, as well as interviews with internal and external leaders.' However, it is not clear whether affected or potentially affected stakeholders are consulted for risk identification purposes. [Sustainable Impact Report 2019, 05/2020: <a href="https://www2.hp.com/h20195">h20195.www2.hp.com</a>]</li> <li>• Not met: In consultation with HR experts: It also indicates: 'In 2019, we completed a third-party-led human rights impact assessment. The external expert we worked with evaluated the validity of HP's internal assessment findings and process, recommended improvements to our existing assessment approach, and conducted an independent human rights impact assessment. The approach was as follows: 1. Validating a list of salient human rights risks across HP's value chain by providing an external expert lens to HP's existing efforts; 2) Assessing the degree to which risks are effectively managed by existing mechanisms; 3) Evolving HP's existing approach to managing risks'. Although no evidence was found in relation to expert(s) consulted, the Company describes the actions carried out with it. [Human Rights Progress Report 2019, N/A: <a href="https://www2.hp.com/h20195">h20195.www2.hp.com</a>]</li> <li>• Not met: Triggered by new circumstances</li> </ul>
B.2.2	Assessing: Assessment of risks and impacts identified (salient risks and key industry risks)	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Salient risk assessment (and context): In its Human Rights Report, the Company states: 'Since 2011, we have regularly conducted internal human rights impact assessments (HRIA) to take stock of actual and potential human rights risks across our business. Our approach is to: [...] Compare potential and actual risks of rights holders served by the function against the rights described by the UDHR – enabling us to uncover new or emerging risks that have not previously been identified. We characterize risk based on scope, likelihood, severity, and difficulty to remediate the impact. We consider risks salient based on the combination of likelihood, severity, and difficulty to remediate. [...] In 2019, we completed a third-party-led human rights impact assessment. The external expert we worked with evaluated the validity of HP's internal assessment findings and process, recommended improvements to our existing assessment approach, and conducted an independent human rights impact assessment'. However, no details found in relation to factors taken into account (social, economic, geographical, etc) to determine saliency. [Human Rights Progress Report 2019, N/A: <a href="https://www2.hp.com/h20195">h20195.www2.hp.com</a>]</li> <li>• Met: Public disclosure of salient risks: The Company indicates: 'The assessment highlighted several salient risks that we are now addressing through our human rights program: Indicators of modern slavery such as retention of identity documents and charging of recruitment fees; Risk of unsafe working conditions and excessive working hours at supplier sites; Risk of forced labor, child labor, and armed group conflict associated with raw minerals extraction.' [Sustainable Impact Report 2019, 05/2020: <a href="https://www2.hp.com/h20195">h20195.www2.hp.com</a>]</li> <li>Score 2</li> <li>• Not met: Both requirements under score 1 met</li> </ul>
B.2.3	Integrating and Acting: Integrating assessment findings internally and taking appropriate action	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Action Plans to mitigate risks: For each salient issue identified, the Company discloses in a table 'Human rights risks and plans'. For instance, the Company's risks mitigation tactics to face the risk of 'forced labor', 'excessive working hours' and 'unsafe working conditions', all of them identified in the Supply chain, include to 'Conduct risk-based due diligence across HP's supplier base; Prioritize suppliers for self-assessment questionnaires, capability building, and onsite audits, and expand those programs; Provide remedy to victims (more than \$1.2 million in repayments to over 1,000 workers); Participate in multi-stakeholder initiatives that develop and encourage responsible labor practices'. No new relevant evidence found in latest revision. [2018 Sustainability Impact Report, 05/2019: <a href="https://www2.hp.com/h20195">h20195.www2.hp.com</a>]</li> <li>• Met: Including in ICT supply chain: See above</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>Met: Example of Actions decided: With respect to 'Conflict and forced labor associated with raw material extraction', the Company decided the following actions: 'Conduct due diligence; Participate in multi-stakeholder initiatives that develop and promote responsible minerals sourcing; Engage with and encourage smelters to participate in responsible minerals sourcing assurance programs and drive our suppliers to source from those smelters.' No new relevant evidence found in latest revision. [2018 Sustainability Impact Report, 05/2019: <a href="https://www2.hp.com">h20195.www2.hp.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>Met: Both requirements under score 1 met: See above</li> </ul>
B.2.4	Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>Not met: System to check if Actions are effective: The Company indicates in its Human Rights Report: 'As a part of conducting due diligence and engagement with our partners, suppliers and employees, we look to identify recurring issues, gaps, or challenges in performance that need to be systematically addressed. Integrating this knowledge into our communications, training and capability building helps to better prevent and mitigate risks. Through our collaborations with the RBA and others, we work to build industry tools, standards, and training to support continuous improvement.' However, no evidence found of a system to check the effectiveness of actions put in place to face the salient human rights issues. [Human Rights Progress Report 2019, N/A: <a href="https://www2.hp.com">h20195.www2.hp.com</a>]</li> <li>Not met: Lessons learnt from checking effectiveness</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>Not met: Both requirement under score 1 met</li> </ul>
B.2.5	Communicating : Accounting for how human rights impacts are addressed	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>Met: Comms plan re identifying risks: See indicator B.2.1. The Company carries out a global risk identification and assessment process that includes both its own operations and business partners, and describes at least some features of the process</li> <li>Not met: Comms plan re assessing risks: In order to be awarded this indicator, the Company has to achieve a full score in B.2.2</li> <li>Met: Comms plan re action plans for risks: See indicator B.2.3</li> <li>Not met: Comms plan re reviewing action plans: In order to be awarded this indicator, the Company has to achieve a full score in B.2.4</li> <li>Not met: Including ICT suppliers: In order to be awarded this indicator, the Company has to achieve a full score in B.2.2/B.2.3/B.2.4 and at least 1,5 points in B.2.1</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>Not met: Responding to affected stakeholders concerns</li> <li>Not met: Ensuring affected stakeholders can access communications</li> </ul>

## Remedies and Grievance Mechanisms

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.1	Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>Met: Channel accessible to all workers: On its website, the Company indicates: 'We encourage anyone with a concern to speak up and report things that don't seem right. We provide multiple channels, making it easy to ask questions or report a concern. Use any of the options listed on this page when you have questions or concerns about a potential violation of law, company policy, or Integrity at HP.' The Company also states that Integrity at HP is a program which pertains not only to its 'conduct within the company but also to conduct involving our customers, channel partners, suppliers and competitors.' [Integrity at HP, N/A: <a href="https://investor.hp.com">investor.hp.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>Not met: Number grievances filed, addressed or resolved: In its Sustainability Report, the Company discloses the number of reports to HP global Integrity at HP team or other compliance functions in in the last year: 171. It also break down this number by reported item, including human resources (23%) conflict of interest, fraud, anti-corruption, misuse of assets, workplace security, etc. However, none of the items is related to human rights, so it is not clear whether there was none human rights related reports or if this system is only focused on its Anti-Corruption Code. The Company has provided comments to CHRB regarding this indicator. However, this document or its content has not been found in publicly available sources. [Sustainable Impact Report 2019, 05/2020: <a href="https://www2.hp.com">h20195.www2.hp.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Met: Channel is available in all appropriate languages: The Company indicates that there is a Guideline available 'from anywhere in the world 24 hours a day. Translators are available and callers can remain anonymous, except where anonymous reporting is prohibited by local law.' In addition, the Company has translated its document about 'Report an Ethics concern' to 21 languages (available in its website section 'Integrity at HP'). [Integrity at HP, N/A: <a href="http://investor.hp.com">investor.hp.com</a>]</li> <li>• Met: Expect ICT supplier to have equivalent grievance systems: In its Supplier Code the Company indicates: 'The management system should contain the following elements: [...] Ongoing processes, including an effective grievance mechanism, to assess employees' understanding of and obtain feedback on or violations against practices and conditions covered by this Code and to foster continuous improvement.' In addition, the Supplier Code requires that 'At a minimum, Suppliers shall require their next tier Suppliers to acknowledge and implement the HP Code and hand the HP Code down to their sub-tier Suppliers'. [Supplier Code of Conduct, 08/2018: <a href="http://h20195.www2.hp.com">h20195.www2.hp.com</a>]</li> <li>• Met: Opens own system to ICT supplier workers: See above [Integrity at HP, N/A: <a href="http://investor.hp.com">investor.hp.com</a>]</li> </ul>
C.2	Grievance channel(s)/mechanism(s) to receive complaints or concerns from external individuals and communities	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Grievance mechanism for community: On its website, in the 'Report ethic concern' link the Company indicates: 'We encourages anyone with a concern to speak up and report things that don't seem right. We provide multiple channels, making it easy to ask questions or report a concern. Use any of the options listed on this page when you have questions or concerns about a potential violation of law, company policy, or Integrity at HP.' [Integrity at HP, N/A: <a href="http://investor.hp.com">investor.hp.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Describes accessibility and local languages: The Company indicates: 'Call the Ethics Helpline from anywhere in the world 24 hours a day. Translators are available and callers can remain anonymous, except where anonymous reporting is prohibited by local law.' In addition, the Company has translated its document about 'Report an Ethics concern' to 21 languages (available on its website section 'Integrity at HP'). [Integrity at HP, N/A: <a href="http://investor.hp.com">investor.hp.com</a>]</li> <li>• Not met: Expects ICT supplier to have community grievance systems</li> <li>• Met: ICT supplier communities use global system: See above. The channel is open to anyone in 21 languages (plus English) [Integrity at HP, N/A: <a href="http://investor.hp.com">investor.hp.com</a>]</li> </ul>
C.7	Remedying adverse impacts and incorporating lessons learned	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Describes how remedy has been provided: In its Sustainable Impact Report, the Company indicates: 'As a part of addressing priority findings identified in the last two years, HP has confirmed remedy to more than 6,500 workers in our operations and supply chain including more than \$2.2 million USD in repayments addressing findings associated with modern slavery occurring in the last two years'. [MSA Statement 2019, 2020: <a href="http://www8.hp.com">www8.hp.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Approach to learning from incident to prevent future impacts: In addition, in its Human Rights Report, the company states: 'As a part of conducting due diligence and engagement with our partners, suppliers and employees, we look to identify recurring issues, gaps, or challenges in performance that need to be systematically addressed. Integrating this knowledge into our communications, training and capability building helps to better prevent and mitigate risks. Through our collaborations with the RBA and others, we work to build industry tools, standards, and training to support continuous improvement'. [Human Rights Progress Report 2019, N/A: <a href="http://h20195.www2.hp.com">h20195.www2.hp.com</a>]</li> <li>• Met: Evaluation of the channel/mechanism: In its 2017 Sustainable Impact Report, the Company indicates: 'Researched the grievance mechanisms available to workers in our commodity and final assembly suppliers. Based on this assessment, all of HP's final assembly suppliers have accessible grievance mechanisms in place and have informed workers about how to access those systems. According to the recent RBA Code revision, these suppliers must now prove effectiveness of those mechanisms, including the percentage of grievances addressed and closed.' In addition, it adds: 'In 2016, we evaluated all nine relevant corporate functions against the appropriate UN UDHR rights. [...] We found effective monitoring and grievance mechanisms in place in Human Resources and Technical Regulations, and remediation available.' No new relevant evidence found in latest report. [2017 Sustainable Impact Report, 06/2018: <a href="http://www8.hp.com">www8.hp.com</a>]</li> </ul>

## Performance: Responses to Serious Allegations (Not included in the overall score)

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(1).0	Serious allegation No 1		<ul style="list-style-type: none"> <li>• Headline: HP faces child labour claims in its supply chain in the Democratic Republic of Congo</li> <li>• Area: Child labour</li> <li>• Story: On November 15, 2017, Amnesty International, a Human Rights NGO, released a report which reveals that electronic and electric vehicle companies, including HP, are still not doing enough to stop human rights abuses entering their cobalt supply chains.</li> </ul> <p>The report assessed the policies and practices of 29 companies and how much their cobalt-sourcing practices have improved since its previous report published in January 2016. More than half of the world's cobalt, a key element in lithium-ion batteries, is sourced from the Democratic Republic of Congo (DRC), where Amnesty has found human rights abuses. Amnesty International stated that about a fifth of the country's cobalt production is mined by informal miners including children, often in dangerous conditions.</p> <p>Amnesty International found that HP has made some improvements to its supply chain policies and practices with respect to cobalt, but that these do not yet conform to international standards. the Company still has room for additional improvement, particularly in terms of disclosure of its cobalt smelters and refiners and information about identified risks and mitigation or remediation efforts. Therefore, Amnesty International assessed HP's level of response as 'moderate action taken'.</p> <p>The electronics companies and the automobile manufacturers included in the report are: Apple, Samsung SDI, Dell, HP, BMW, Tesla, LG Chem, Sony, Samsung Electronics, General Motors, Volkswagen, Fiat-Chrysler, Daimler, Hunan, Shanshan, Ampere Technology, Tianjin Lishen, Microsoft, Lenovo, Renault, Vodafone, Huawei, L&amp;F, Tianjin B&amp;M, BYD, Coslight, Shenzhen BAK and ZTE..</p> <ul style="list-style-type: none"> <li>• Sources: [Amnesty International, 15/11/2017: <a href="https://www.amnesty.org/">amnesty.org</a>][Reuters, 15/11/2017: <a href="https://www.reuters.com/">reuters.com</a>]</li> </ul>
E(1).1	The Company has responded publicly to the allegation	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Public response available: The Company provides a detailed response to the Amnesty International allegations on the BHRRC website, outlining a number of actions that were undertaken in the wake of the allegations. [Amnesty International's report on child labour in DRC, 2017: <a href="https://www.amnesty.org/">amnesty.org</a> &amp; Response to Amnesty DRC allegation, 19/07/2019: <a href="https://www.bhrrc.org/">bhrrc.org</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Response goes into detail: The company details the actions it undertook, saying "We informed our Chief Supply Chain Officer of this allegation and agreed on a course of action with our suppliers...We initiated onsite procurement audits with relevant direct battery suppliers to identify the cobalt smelters that may be in our supply chain...Because neither HP nor our direct suppliers have a direct business relationship with smelters or their mining partners, our suppliers relied on declarations made with respect to the smelters and refiners of cobalt of their sub suppliers...Based on the information we obtained from our suppliers, we believe cobalt processed by Huayou was likely less than 5% of our total cobalt usage in 2016. [Response to Amnesty DRC allegation, 19/07/2019: <a href="https://www.bhrrc.org/">bhrrc.org</a>]</li> </ul>
E(1).2	The Company has appropriate policies in place	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Company policies address the general issues raised: In its Human Rights Policy the Company includes provisions covering all ILO core. [Sustainable Impact and Human Rights Policy, 2019: <a href="https://www8.hp.com/">www8.hp.com</a>]</li> <li>• Met: Policies apply to the type of business relationships involved: The policy also applies to the Company's suppliers. [Supplier Code of Conduct, 08/2018: <a href="https://www2.hp.com/h20195">h20195.www2.hp.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Policies address the specific rights in question: CHRB could not find evidence of the Company's measures to verify the age of workers. [Sustainable Impact and Human Rights Policy, 2019: <a href="https://www8.hp.com/">www8.hp.com</a>]</li> </ul>
E(1).3	The Company has taken appropriate action	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Engages with affected stakeholders: The company in its response says it is engaged with the Responsible Raw Minerals Initiative (RRMI) and states that "The RRMI aims to work with mid and upstream actor efforts, facilitate dialogue with</li> </ul>



Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>external actors, and coordinate downstream actors to develop standards, tools, and programs that advance responsible sourcing. HP is a member of the cobalt work group". The company states that the work group is engaged in developing several tools to advance the responsible sourcing of cobalt. [Response to Amnesty DRC allegation, 19/07/2019: <a href="http://bhrrc.org">bhrrc.org</a>]</p> <ul style="list-style-type: none"> <li>• Met: Encourages linked business to engage affected stakeholders: The company says upon becoming aware of the allegations "We initiated onsite procurement audits with relevant direct battery suppliers to identify the cobalt smelters that may be in our supply chain...The supply of cobalt to our suppliers occurs through a web of supply chain actors, including smelters of ore, refiners, chemical manufacturers, and cathode manufacturers. Because neither HP nor our direct suppliers have a direct business relationship with smelters or their mining partners, our suppliers relied on declarations made with respect to the smelters and refiners of cobalt of their sub suppliers...Based on the information we obtained from our suppliers, we believe cobalt processed by Huayou was likely less than 5% of our total cobalt usage in 2016. " [Response to Amnesty DRC allegation, 19/07/2019: <a href="http://bhrrc.org">bhrrc.org</a>]</li> <li>• Not met: Provides remedies to affected stakeholders: HP is a member of both the RCI and RRMI, but it has not disclosed details of any mitigation or remediation efforts directed at risks or abuses identified in its own cobalt supply chain. [Amnesty International's report on child labour in DRC, 2017: <a href="http://amnesty.org">amnesty.org</a> &amp; Response to Amnesty DRC allegation, 19/07/2019: <a href="http://bhrrc.org">bhrrc.org</a>]</li> <li>• Met: Has reviewed management systems to prevent recurrence: HP stated that it "initiated on-site procurement audits with relevant battery suppliers to identify the cobalt smelters that may be in [its] supply chain". These audits "included inspections of the labelling of cobalt-containing materials within the manufacturing operations as well as reviewing purchase orders by the manufacturing operations". [Amnesty International's report on child labour in DRC, 2017: <a href="http://amnesty.org">amnesty.org</a> &amp; Response to Amnesty DRC allegation, 19/07/2019: <a href="http://bhrrc.org">bhrrc.org</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Remedies are satisfactory to the victims: HP is a member of both the RCI and RRMI, but it has not disclosed details of any mitigation or remediation efforts directed at risks or abuses identified in its own cobalt supply chain.</li> <li>• Met: Has improved systems and engaged affected stakeholders: The company has also provided details of its membership of initiatives such as the RRMI. Additionally HP stated that it "initiated on-site procurement audits with relevant battery suppliers to identify the cobalt smelters that may be in [its] supply chain". These audits "included inspections of the labelling of cobalt-containing materials within the manufacturing operations as well as reviewing purchase orders by the manufacturing operations...Based on the information we obtained from our suppliers, we believe cobalt processed by Huayou was likely less than 5% of our total cobalt usage in 2016." [Amnesty International's report on child labour in DRC, 2017: <a href="http://amnesty.org">amnesty.org</a> &amp; Response to Amnesty DRC allegation, 19/07/2019: <a href="http://bhrrc.org">bhrrc.org</a>]</li> </ul>
E(2).0	Serious allegation No 2		<ul style="list-style-type: none"> <li>• <b>Headline:</b> Cal-Comp Electronics accused of sourcing from recruitment agencies linked to systematic exploitation of migrant laborers in Thailand</li> <li>• <b>Area:</b> forced labour</li> <li>• <b>Story:</b> October 2018, Electronics Watch released a report which found that many migrant workers at Cal-Comp Electronic's manufacturing operations in Thailand remain at a heightened risk of exposure to conditions of forced labour. The report notes that despite changes undertaken by the company in 2016, migrant workers from Myanmar continue to report excessive recruitment fees, in excess of the 79 Euro limit they should have to pay under Myanmar regulations, which are being required by recruitment agencies in Thailand. The report notes that "In some cases workers have reported nearly €700 in recruitment related service fees or costs, equivalent to more than two months salary". A second report, released in February 2020, explains how the situation has improved throughout three years of monitoring and action taken by Electronics Watch and the Migrant Workers Rights Network. It states that while Cal-Comp was not able to control its recruiting agencies, since 2017 all workers controlled their own passports and work permits, they have received their contracts in their native languages, and had received partial reimbursement for their fees. By 2019, the company agreed to pay back all workers' fees who started at the company during or after January 2016.</li> <li>• <b>Sources:</b> [BHRRC - 10/2018: <a href="http://business-humanrights.org">business-humanrights.org</a>][Electronics Watch - 10/2018: <a href="http://electronicswatch.org">electronicswatch.org</a>][Electronics Watch - 02/2020: <a href="http://electronicswatch.org">electronicswatch.org</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(2).1	The Company has responded publicly to the allegation	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Public response available: The Company provided a public response, stating 'HP conducted multiple assessments at NKG and is working to address concerns and drive improvement. We are working on the ground with Cal-Comp/NKG, who has since made notable improvements including returning workers their personal documentation, directly hiring contract workers and reimbursing workers for placement fees. Cal-Comp/NKG have improved their communication tools so that workers have a clearer understanding of payroll, recruitment and benefits during their employment. Contracts and communication throughout the facility are in workers' native languages. HP is aware of the most recent Electronics Watch report and we are working with industry peers and a third-party audit firm to carry out a specialized assessment that looks further into the allegations highlighted in their report.' [HP's response to Cal-Comp allegation, 7/3/2019: <a href="https://business-humanrights.org">business-humanrights.org</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Response goes into detail</li> </ul>
E(2).2	The Company has appropriate policies in place	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Company policies address the general issues raised: The Company is a member of the UN Global Compact, which includes policy on the prohibition of forced labour. [Un Global Compact, N/A: <a href="https://unglobalcompact.org">unglobalcompact.org</a>]</li> <li>• Met: Policies apply to the type of business relationships involved: The Supplier Code of Conduct includes expectation not to use forced labour, and mechanisms to be put in place to prevent it. [Supplier Code of Conduct, 08/2018: <a href="https://h20195.www2.hp.com">h20195.www2.hp.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Policies address the specific rights in question: As stated above, the Supplier Code of Conduct has mechanisms in place to prevent forced labour. Additionally, the Company has a Supply Chain Foreign Migrant Worker Standard, which includes more specific policy to prevent forced labour of foreign migrant workers in its supply chain. [Supplier Code of Conduct, 08/2018: <a href="https://h20195.www2.hp.com">h20195.www2.hp.com</a> &amp; Supply Chain Foreign Migrant Worker Standard, 09/2015: <a href="https://h20195.www2.hp.com">h20195.www2.hp.com</a>]</li> </ul>
E(2).3	The Company has taken appropriate action	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Encourages linked business to engage affected stakeholders: The Company has worked 'on the ground with Cal-Comp/NKG, who has since made notable improvements including returning workers their personal documentation, directly hiring contract workers and reimbursing workers for placement fees.' [HP's response to Cal-Comp allegation, 7/3/2019: <a href="https://business-humanrights.org">business-humanrights.org</a>]</li> <li>• Met: Provides remedies to affected stakeholders: The Company has worked 'on the ground with Cal-Comp/NKG, who has since made notable improvements including returning workers their personal documentation, directly hiring contract workers and reimbursing workers for placement fees.' [HP's response to Cal-Comp allegation, 7/3/2019: <a href="https://business-humanrights.org">business-humanrights.org</a>]</li> <li>• Met: Has reviewed management systems to prevent recurrence: The Company implemented its Supply Chain Foreign Migrant Worker Standard, the same year these allegations were brought to its attention. [Cal-Comp: A Lesson in the Importance of Worker-Driven Monitoring to End Forced Labour, 2/2020: <a href="https://electronicswatch.org">electronicswatch.org</a> &amp; Supply Chain Foreign Migrant Worker Standard, 09/2015: <a href="https://h20195.www2.hp.com">h20195.www2.hp.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Remedies are satisfactory to the victims: Although remedy has been provided to 10,570 workers, Electronics Watch notes that the remedy is not complete, stating that "Ongoing monitoring by Electronics Watch and MWRN suggests that more than 1,000 workers employed in one legally separate division were bypassed and have not received compensation for the recruitment fees they paid as of the time of this writing. Tracking down former workers who are owed reimbursement is also an ongoing process in which MWRN and others who can communicate with former workers have a vital role." [MSA Statement 2019, 2020: <a href="https://www8.hp.com">www8.hp.com</a> &amp; Cal-Comp: A Lesson in the Importance of Worker-Driven Monitoring to End Forced Labour, 2/2020: <a href="https://electronicswatch.org">electronicswatch.org</a>]</li> <li>• Met: Has improved systems and engaged affected stakeholders: See above [HP's response to Cal-Comp allegation, 7/3/2019: <a href="https://business-humanrights.org">business-humanrights.org</a> &amp; Supply Chain Foreign Migrant Worker Standard, 09/2015: <a href="https://h20195.www2.hp.com">h20195.www2.hp.com</a>]</li> </ul>

## Disclaimer

A score of zero for a particular indicator does not mean that bad practices are present. Rather it means that we have been unable to identify the required information in public documentation.

See the 2020 Key Findings report and the 2019 technical annex for more details of the research process.

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