

**Company Name** Hewlett Packard Enterprise  
**Industry** ICT (Supply Chain only)  
**UNGP Core Score (\*)** 18.5 out of 26

Score	Out of	For indicators
<b>Governance and Policy Commitments</b>		
2	2	A.1.1 Commitment to respect human rights
1.5	2	A.1.2 Commitment to respect the human rights of workers
1	2	A.1.4 Commitment to engage with stakeholders
1.5	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
1	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
1.5	2	C.2 Grievance channels/mechanisms to receive complaints or concerns from external individuals and communities
1.5	2	C.7 Remedying adverse impacts and incorporating lessons learned
<b>18.5</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 Standards of Business Conduct, the Company states: 'we support and respect human rights and ensure that our business partners and suppliers do the same'. In addition, in its Global Human Rights Policy, the Company states: 'HPE upholds and respects human rights as reflected in the United Nations Universal Declaration of Human Rights (UDHR), the UN Global Compact, and the UN Guiding Principles on Business and Human Rights, which further clarify government responsibility to protect human rights against third party abuses, business responsibility to respect human rights, and a joint responsibility to remedy if rights are not upheld'. [Standards of Business Conduct - website, N/A: <a href="http://sbc.hpe.com">sbc.hpe.com</a> &amp; Global Human Rights Policy, 02/2017: <a href="http://hpe.com">hpe.com</a>]</li> <li>• Met: UNGC principles 1 &amp; 2: The Company is a signatory of the UNGC. [Global Human Rights Policy, 02/2017: <a href="http://hpe.com">hpe.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: UNGPs: In its Supplier Code, referring to itself, the Company indicates: 'HPE respects human rights [...] We commit to the United Nations Guiding Principles on Business and Human Rights'. [Supplier Code of Conduct, 13/01/2020: <a href="http://h20195.www2.hpe.com">h20195.www2.hpe.com</a>]</li> </ul>
A.1.2	Commitment to respect the human rights of 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: UNGC principles 3-6: The Company is a signatory to the UN Global Compact [Global Compact signatory, N/A: <a href="http://unglobalcompact.org">unglobalcompact.org</a> &amp; Global Human Rights Policy, 02/2017: <a href="http://hpe.com">hpe.com</a>]</li> <li>• Met: Explicitly list ALL four ILO for ICT suppliers: The supplier code includes provisions covering all ILO Core. These include child labour, forced labour and discrimination. In relation to freedom of association and collective bargaining, it indicates the following: '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. Workers and/or their representatives shall be able to openly communicate and share ideas and concerns with management regarding working conditions and management practices without fear of discrimination, reprisal, intimidation or harassment'. In addition, in its document 'Supply Chain Responsibility - Our approach', the Company says: 'Our SCR 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'. [Supplier Code of Conduct, 13/01/2020: <a href="http://h20195.www2.hpe.com">h20195.www2.hpe.com</a> &amp; Supply Chain Responsibility _ Our Approach, 07/2020: <a href="http://assets.ext.hpe.com">assets.ext.hpe.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Explicit commitment to All four ILO Core: Its Standard of Business Conduct, accessible on its website, makes reference to some ILO Core: 'We do not discriminate against any employee[...]. [...]We take steps to ensure that child labor, prison or forced labor, and physical punishment are never permitted in any of HPE's operations, or those of our business partners or suppliers'. However, no reference found to freedom of association and collective bargaining. [Standards of Business Conduct - website, N/A: <a href="http://sbc.hpe.com">sbc.hpe.com</a>]</li> <li>• Met: Respect H&amp;S of workers: In addition, in its Environmental, health and safety Policy, the Company states that it 'is committed to conducting its business to deliver leading environmental, health, and safety performance. This is consistent with our commitment to corporate citizenship, social responsibility, and</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>sustainability. Our goals are to provide products and services that are safe and environmentally sound throughout their lifecycles, conduct our operations in an environmentally responsible manner, and create health and safety practices and work environments that enable us to work injury-free'. [Environmental, health and safety Policy, 05/2020: <a href="https://assets.ext.hpe.com">assets.ext.hpe.com</a>]</p> <ul style="list-style-type: none"> <li>• Met: H&amp;S applies to ICT suppliers: In addition, its Supplier Code of Conduct includes provisions to respect health and safety of its workers, including the following topics: Occupational Safety; Emergency Preparedness; Occupational Injury and Illness; Industrial Hygiene; Physically Demanding Work; Machine Safeguarding; Sanitation, Food, and Housing; and Health and Safety Communication. [Supplier Code of Conduct, 13/01/2020: <a href="https://h20195.www2.hpe.com">h20195.www2.hpe.com</a>]</li> <li>• Not met: working hours for workers</li> <li>• Not met: Working hours for ICT suppliers: The Supplier Code of Conduct indicates: 'Working hours are not to exceed the maximum set by local law. Further, 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 days.' However, no evidence found of references to standard working week hours or the Company explicitly requiring to respect ILO conventions on working hours. [Supplier Code of Conduct, 13/01/2020: <a href="https://h20195.www2.hpe.com">h20195.www2.hpe.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: Commits to stakeholder engagement: The Company states in its Disclosure to CHRB Platform: 'HPE is committed to stakeholder engagement and identifies stakeholders through various, complementary approaches, including our materiality assessment and our most recent human rights assessment, which was carried out by a third party'. [Supplement disclosure to CHRB, 19/07/2019: <a href="https://business-humanrights.org">business-humanrights.org</a>]</li> <li>• Met: Regular stakeholder engagement: In its Modern Slavery Statement, the Company states: 'Hewlett Packard Enterprise engages with a broad range of stakeholders, including workers at HPE supplier facilities (through worker interviews and capability building programs)'. As an example, the Company indicates in its Living Progress Report: 'We have a number of channels to engage with team members and encourage ongoing dialogue globally. [...] In 2019, our annual Voice of the Workforce survey engagement score rose to 81%, an 18-point increase over the last two years. Seventy-six percent of our workforce completed the survey, an increase of three points from the previous year'. [MSA 2019, 01/04/2020: <a href="https://h20195.www2.hpe.com">h20195.www2.hpe.com</a> &amp; Living the progress Report 2019, 05/2020: <a href="https://assets.ext.hpe.com">assets.ext.hpe.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</li> </ul>
A.1.5	Commitment to remedy	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: Commits to remedy: The Company states in its Global Human Rights Policy that 'HPE upholds and respects human rights as reflected in the United Nations Universal Declaration of Human Rights (UDHR), the UN Global Compact, and the UN Guiding Principles on Business and Human Rights, which further clarify government responsibility to protect human rights against third party abuses, business responsibility to respect human rights, and a joint responsibility to remedy if rights are not upheld.' In addition, in its 2018 Corporate Responsibility Report, the Company states: 'We reinforce our statements with a transparent approach to identifying risks to these rights across our value chain and work to prevent, mitigate, and remediate any human rights impacts associated with our business.' No new relevant evidence found in latest revision. [Global Human Rights Policy, 02/2017: <a href="https://hpe.com">hpe.com</a> &amp; 2018 Living Progress Report, 05/2019: <a href="https://assets.ext.hpe.com">assets.ext.hpe.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Not obstructing access to other remedies: The Company indicates that it 'provides multiple channels for individuals in our value chain to raise concerns, including our workers, those of our suppliers, community members, and the general public.' However, no evidence found of a commitment to not obstruct access to other initiatives that provide remedy. [Know the Chain Disclosure, 01/2020: <a href="https://business-humanrights.org">business-humanrights.org</a>]</li> <li>• Not met: Collaborating with other remedy initiatives</li> <li>• Met: Work with ICT suppliers to remedy impacts: In its Modern Slavery Statement, the Company indicates: 'HPE has worked intensively in each instance to remediate the identified issues and to strengthen the facility's policies and systems to guard against reoccurrences'. In addition, in its 'Our approach' document, it</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			states: 'Suppliers should take steps to both remedy any negative impact on workers and prevent further negative impacts. We work in partnership with suppliers to review root causes, approve plans to improve and remedy, and monitor evidence of improvement and worker engagement. Grievance channels, third party audits, and partnership with our suppliers are important tools for ensuring remedy'. 2018 Living Progress Report, the Company discloses information about a specific case: 'After conducting an audit, we provided TES written guidance materials, and connected them with another local HPE supplier that already successfully followed our no-fees standard. TES worked with us cooperatively to improve its understanding of our standard and then fully reimbursed the recruitment fees to affected workers'. [MSA 2019, 01/04/2020: <a href="http://h20195.www2.hpe.com">h20195.www2.hpe.com</a> & Supply Chain Responsibility _ Our Approach, 07/2020: <a href="http://assets.ext.hpe.com">assets.ext.hpe.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. The Company is signatory to the UN Global Compact.</li> <li>• Met: Senior responsibility for HR: In its 2018 Living Progress Report, the Company indicates: 'HPE Living Progress Strategy Council: Evaluates the company's ESG focus areas and priorities; Provides support from senior leaders across the organization for Living Progress objectives and commitments; Oversees communication of ESG strategy to internal stakeholders; Leads materiality assessments, reporting activities, and engages with external stakeholders'. This includes human rights. [Living the progress Report 2019, 05/2020: <a href="http://assets.ext.hpe.com">assets.ext.hpe.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Day-to-day responsibility: The Company also indicates: 'The HPE Office of Legal and Administrative Affairs guides our approach and works across the business to address specific issues as they arise. We recently updated our policies and commitments related to Human Rights to strengthen our pledge to global standards, clarify our commitment to respect the rights of vulnerable groups and human rights defenders, and better explain how we ensure compliance with the policy.' In addition, in its Living Progress Report 2018, it indicates with respect its Office of Legal and Administrative Affairs: 'We engage with external stakeholders, governments, industry organizations, specialized consultants, and across our own company to identify potential human rights issues to ensure that we focus our resources where they are most needed'. In addition, see below in relation to the Global Social and Environmental Responsibility Team. [2018 Living Progress Report, 05/2019: <a href="http://assets.ext.hpe.com">assets.ext.hpe.com</a> &amp; Living the progress Report 2019, 05/2020: <a href="http://assets.ext.hpe.com">assets.ext.hpe.com</a>]</li> <li>• Met: Day-to-day responsibility for ICT in supply chain: In its 'Supply Chain Responsibility: Our approach' document, the Company indicates: The Global Social and Environmental Responsibility (SER) Team in the Ethics and Compliance Office, which resides within the Office of Legal and Administrative Affairs, is responsible for establishing and coordinating the policies, programs, and processes governing HPE's approach to human rights and ethical conduct in the supply chain. The Global SER team works closely with dedicated individuals in the product supply chain, indirect procurement, corporate affairs, and other organizations to implement and manage policies and programs in our operations and in our supply chain.' [Supply Chain Responsibility _ Our Approach, 07/2020: <a href="http://assets.ext.hpe.com">assets.ext.hpe.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
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: in its Disclosure to CHRB Platform, the Company indicates: 'Our Global SER team recently engaged an independent third party to carry out a corporate-wide human rights assessment. The scope of the assessment covered identification of the most salient risks, a review of existing policy, a review of process and due diligence tools and a scan of published media, concerns and opinions of HPE. [...]. In addition to our corporate-wide human rights assessments, we review risks when we have a relevant change to the business.' In the Living Progress Report, the Company states: 'In 2019, HPE conducted a company-wide Human Rights Impact Assessment with an external evaluator, Article One, to better understand our risks, identify gaps in our due diligence, and update our strategy and processes in order to more effectively manage our human rights risks. The assessment identified HPE's most salient risks, all of which are common throughout the IT industry'. [Living the progress Report 2019, 05/2020: <a href="https://assets.ext.hpe.com">assets.ext.hpe.com</a> &amp; Supplement disclosure to CHRB, 19/07/2019: <a href="https://business-humanrights.org">business-humanrights.org</a>]</li> <li>• Met: Identifying risks in ICT suppliers: In its Modern Slavery Statement, the Company indicates: 'We work to identify emerging risks in our supply chain at global, regional, and local levels. We analyze information from our supplier monitoring program, worker engagement, extensive stakeholder network, and other external sources to look for, and address risks proactively'. In addition, in its Living Progress Data Summary, it adds: 'In 2019, we continued to undertake stringent due diligence within our supply chain to uncover risks—including through additional specialized assessments against our Foreign Migrant Worker Standard'. [Data Summary 2019, 05/2020: <a href="https://h20195.www2.hpe.com">h20195.www2.hpe.com</a> &amp; MSA 2019, 01/04/2020: <a href="https://h20195.www2.hpe.com">h20195.www2.hpe.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Ongoing global risk identification: As indicated above, the Company reports on its 2019 work in relation to risk identification and assessment. It also says that carries out process when there are changes in circumstances. [Data Summary 2019, 05/2020: <a href="https://h20195.www2.hpe.com">h20195.www2.hpe.com</a> &amp; MSA 2019, 01/04/2020: <a href="https://h20195.www2.hpe.com">h20195.www2.hpe.com</a>]</li> <li>• Not met: In consultation with stakeholders: As indicated above, the Company reports that it works 'to identify emerging risks in our supply chain at global, regional, and local levels. We analyze information from our supplier monitoring program, worker engagement, extensive stakeholder network, and other external sources to look for, and address risks proactively.' However, it is not clear how it identifies risks in own operations including through (affected) stakeholder consultation. [MSA 2019, 01/04/2020: <a href="https://h20195.www2.hpe.com">h20195.www2.hpe.com</a>]</li> <li>• Met: In consultation with HR experts: Also in its Living the progress Report: 'In 2019, HPE conducted a company-wide Human Rights Impact Assessment with an external evaluator, Article One, to better understand our risks, identify gaps in our due diligence, and update our strategy and processes in order to more effectively manage our human rights risks'. [Living the progress Report 2019, 05/2020: <a href="https://assets.ext.hpe.com">assets.ext.hpe.com</a>]</li> <li>• Met: Triggered by new circumstances: The Company indicates in its disclosure to CHRB that 'in addition to our corporate-wide human rights assessments, we review risks when we have a relevant change to the business'. In addition, in its Living the progress Report, it states that it conducts 'due diligence on relevant business activities in appropriate circumstances.' Finally, in an article disclosed on its website, it states: 'we review risks when we have a relevant change to the business, such as an acquisition or when entering a new market. We are using the results of our assessments to update to our human rights strategy and develop a more accurate picture of our risks, which helps us to deliver on our commitment in a changing environment'. [HPE's commitment to protecting human rights, 11/12/2019: <a href="https://hpe.com">hpe.com</a> &amp; Living the progress Report 2019, 05/2020: <a href="https://assets.ext.hpe.com">assets.ext.hpe.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
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): The Company indicates: 'In 2019, HPE conducted a company-wide Human Rights Impact Assessment with an external evaluator, Article One, to better understand our risks, identify gaps in our due diligence, and update our strategy and processes in order to more effectively manage our human rights risks. The assessment identified HPE's most salient risks, all of which are common throughout the IT industry: responsible use, responsible product development, modern slavery and decent work, conflict minerals, inclusion and diversity, and water use.' However, no further information found describing the process for assessing human rights risk, including how relevant factors were taken into account to determine salience of issue identified (geographical, social, economical, etc). [Living the progress Report 2019, 05/2020: <a href="https://assets.ext.hpe.com">assets.ext.hpe.com</a>]</li> <li>• Met: Public disclosure of salient risks: As indicated above, the Company discloses its most salient risks: 'responsible use, responsible product development, modern slavery and decent work, conflict minerals, diversity and inclusion, and water use.' In addition, in its Modern Slavery Statement, the Company indicates: 'Through research, on-site due diligence, and engagement with supplier facilities and industry groups, HPE identified the following high risks in its supply chain: the risk of forced student labor in China, and the risk of forced labor specific to foreign migrant workers in Taiwan, Malaysia, and Singapore'. [Living the progress Report 2019, 05/2020: <a href="https://assets.ext.hpe.com">assets.ext.hpe.com</a> &amp; MSA 2019, 01/04/2020: <a href="https://h20195.www2.hpe.com">h20195.www2.hpe.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <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: The Company indicates that it addresses risks 'to workers and the environment in the following ways: 1. Remediation. Using information from audits and assessments, we improve SER performance through: Defined corrective action plans with focused follow-up assurance activities; Escalated remediation for critical findings and situations when effort beyond standard corrective action is needed. 2. Capability building. We help suppliers improve SER performance through programs and partnerships with NGOs, training partners, and governmental organizations focusing primarily on worker empowerment and management systems development. 3. Business integration. Our program relies on procurement operations to motivate and incentivize suppliers, including through regular supplier business reviews and day-to-day engagement. 4. Multi-industry collaboration. We work with industry peers and consortia to influence industry alignment and direction. Collaboration can entail general sharing of best practices, or consulting on amendments to the RBA Code of Conduct. We also participate in multi-industry collaboration to drive and support change beyond the IT industry.' [Supply Chain Responsibility _ Our Approach, 07/2020: <a href="https://assets.ext.hpe.com">assets.ext.hpe.com</a>]</li> <li>• Met: Including in ICT supply chain: See above</li> <li>• Met: Example of Actions decided: See above. In addition, in its MSA Statement, the Company indicates: 'Since 2017, HPE has promoted training courses provided by RLI to suppliers and recruitment agents for additional training and guidance on industry standards.. [...] HPE provided on-site capability building services to a supplier in Taiwan. This localized engagement focused on reviewing HPE's prohibition of recruitment fees, conducting root cause and gap analyses, and developing new processes and policies that if implemented, would improve the supplier's ability to avoid, recognize, and resolve issues in the future.' Forced labor and forced labour specifically to migrant is considered a salient issue for the Company. [MSA 2019, 01/04/2020: <a href="https://h20195.www2.hpe.com">h20195.www2.hpe.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Both requirements under score 1 met</li> </ul>
B.2.4	Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts	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: System to check if Actions are effective</li> </ul>



Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Met: Lessons learnt from checking effectiveness: According to its MSA Statement: 'HPE has monitored for risks related to the recruitment and employment of foreign migrant workers at supplier sites. We also carry out research and engage key stakeholders to understand the challenges facing the most vulnerable groups in our supply chain in order to develop potential solutions to address these issues. [...]. As anticipated, by conducting more in-depth assessments at sites evaluated as potentially higher risk, we found more issues of non-conformance with HPE policies and standards, including high-risk practices, as well as inadequate policies and programs to protect against risks of forced labor. In particular, we identified six critical findings related to risks of forced labor in our supply chain in FY19. The types of findings included: Payment of excessive recruitment fees; Retention of worker documents and related issues; Verbal harassment and unfair treatment by management of workers; and Hours and shifts worked by students in violation of HPE policies and standards. HPE has worked intensively in each instance to remediate the identified issues and to strengthen the facility's policies and systems to guard against reoccurrences'. [MSA 2019, 01/04/2020: <a href="https://www2.hpe.com">h20195.www2.hpe.com</a>] Score 2</li> <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>• Met: Including ICT suppliers: Evidence refers mainly to supply chain, although as indicated above, evidence is still not sufficient in relation to assessment process for determining salience or systems to track effectiveness of actions taken to prevent/mitigate risks.</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Responding to affected stakeholders concerns: The Company reports: 'When we identify a case of recruitment fees, we ensure the following steps are taken: – Reach out to all workers of a demographic (e.g. migrants) to remind them of the zero fees policy, ask if they paid any fees, and inform them of the process for reporting fees, and share additional findings with HPE. – Develop a reimbursement plan, in consultation with workers, and a corrective action plan to improve management systems in order to prevent it from reoccurring, and obtain HPE's approval. This often includes a collaborative effort to improve the plan and ensure all HPE requirements are addressed. – Reimburse workers according to their plan, continuously engage with workers, and share multiple forms of evidence of each reimbursement payment with HPE. – Commission an independent third party closure audit to assess and confirm full compliance, and collaborate with the RBA to ensure awareness of the issue'. [Supply Chain Responsibility _ Our Approach, 07/2020: <a href="https://assets.ext.hpe.com">assets.ext.hpe.com</a>]</li> <li>• Not met: Ensuring affected stakeholders can access communications: As indicated above, when the Company identifies a case of recruitment fees, it 'Reach out to all workers of a demographic (e.g. migrants) to remind them of the zero fees policy, ask if they paid any fees, and inform them of the process for reporting fees, and share additional findings with HPE.' However, no further information found describing how ensures that affected stakeholders and their legitimate representatives are able to access communications. [Supply Chain Responsibility _ Our Approach, 07/2020: <a href="https://assets.ext.hpe.com">assets.ext.hpe.com</a>]</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 section 'Report Ethic Concerns', 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 HPE's Standards of Business Conduct.' [Report Ethic Concern, N/A: <a href="http://hpe.com">hpe.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Number grievances filed, addressed or resolved: The Company indicates in its Living Progress Report that it tracks 'the nature of ethics and compliance items reported to us each year. In 2019, the majority of items related to labor law'(38,6%). However, no evidence found of information about the number or percentage of grievances filed, addressed or resolved related to human rights. [Living the progress Report 2019, 05/2020: <a href="http://assets.ext.hpe.com">assets.ext.hpe.com</a> &amp; Data Summary 2019, 05/2020: <a href="http://h20195.www2.hpe.com">h20195.www2.hpe.com</a>]</li> <li>• Met: Channel is available in all appropriate languages: The Company indicates: 'Call the GuideLine 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.' On the other hand, in its Ethics Point FAQ document, the Company indicates that this channel is operated by Navex an independent third-party company recognized as one of the premier providers of this service. According to NAVEX website it provides over 150 languages. [Report Ethic Concern, N/A: <a href="http://hpe.com">hpe.com</a> &amp; Ethics Point FAQ, N/A: <a href="http://secure.ethicspoint.com">secure.ethicspoint.com</a>]</li> <li>• Met: Opens own system to ICT supplier workers: See above. In addition, in its 2018 Corporate Responsibility Report, the Company states: 'We encourage anyone with a concern or question about business conduct to raise it via one of our reporting channels, without fear of reprisal'. [Report Ethic Concern, N/A: <a href="http://hpe.com">hpe.com</a> &amp; 2018 Living Progress Report, 05/2019: <a href="http://assets.ext.hpe.com">assets.ext.hpe.com</a>]</li> </ul>
C.2	Grievance channel(s)/mechanism(s) to receive complaints or concerns from external individuals and communities	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: Grievance mechanism for community: 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 HPE's Standards of Business Conduct.' In addition, in its Living Progress Report, the Company states: 'We encourage anyone with a concern or question about business conduct to raise it via one of our reporting channels, without fear of reprisal'. [Report Ethic Concern, N/A: <a href="http://hpe.com">hpe.com</a> &amp; Living the progress Report 2019, 05/2020: <a href="http://assets.ext.hpe.com">assets.ext.hpe.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Describes accessibility and local languages: In addition, it indicates: 'Call the GuideLine 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'. However, no further details found on channel being available in all appropriate languages (not clear if translators are available in all cases). On the other hand, in its Ethics Point FAQ document, the Company indicates that this channel is operated by Navex an independent third-party company recognized as one of the premier providers of this service. According to NAVEX website it provides over 150 languages. However, it is not clear this mechanism is available to all external individuals and communities who may be adversely impacted by the Company. [Report Ethic Concern, N/A: <a href="http://hpe.com">hpe.com</a> &amp; Ethics Point FAQ, N/A: <a href="http://secure.ethicspoint.com">secure.ethicspoint.com</a>]</li> <li>• Met: ICT supplier communities use global system: See above, anyone can use the Company's reporting channels to reports about breaches of company's policies, including supply chain. [Report Ethic Concern, N/A: <a href="http://hpe.com">hpe.com</a>]</li> </ul>
C.7	Remedying adverse impacts and incorporating lessons learned	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: Describes how remedy has been provided: In its 'Living Progress Data Summary' document, the Company indicates: 'Specific remedial actions have included suppliers repaying recruitment fees; returning deposits; changing company policies and procedures; updating worker contracts; amending labor agent contracts; enhancing labor agent due diligence and monitoring; and clearly</li> </ul>



Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>communicating changes to policies and practices with workers'. [Data Summary 2019, 05/2020: <a href="https://www2.hpe.com">h20195.www2.hpe.com</a>]</p> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Changes introduced to stop repetition: Following up in remediation above In its Modern Slavery Statement, the Company indicates: 'Our supply chain responsibility program reflects years of research and engagement [...] We have taken targeted steps to enhance protection for particularly vulnerable groups that are at heightened risk of exploitation. [...] our approach has been to: [...] Develop specialized supplier standards, as referenced in the "Policies" section above—in addition to our Supplier Code of Conduct—to address key risk areas; Conduct supplier training and education on the standards and best practices for employing these workers; Develop specialized assessment tools—in addition to our standard social compliance audit—and carry out in-depth assessments for supplier sites employing these vulnerable workers (example: HPE's Foreign Migrant Worker Audit); [...] and Engage HPE leadership in promoting our standards and approach to modern slavery, both internally (e.g., awareness building and sponsorship for employee volunteer opportunities to support modern slavery initiatives) and globally'. [MSA 2019, 01/04/2020: <a href="https://www2.hpe.com">h20195.www2.hpe.com</a>]</li> <li>• Not met: Evaluation of the channel/mechanism</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		No allegations meeting the CHRB severity threshold were found.

### 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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As WBA, we want to emphasise that the results will always be a proxy for good human rights management, and not an absolute measure of performance. This is because there are no fundamental units of measurement for human rights. Human rights assessments are therefore necessarily more subjective than objective. The Benchmark

also captures only a snap shot in time. We therefore want to encourage companies, investors, civil society and governments to look at the broad performance bands that companies are ranked within rather than their precise score because, as with all measurements, there is a reasonably wide margin of error possible in interpretation. We also want to encourage a greater analytical focus on how scores improve over time rather than upon how a company compares to other companies in the same industry today. The spirit of the exercise is to promote continual improvement via an open assessment process and a common understanding of the importance of the UN Guiding Principles on Business and Human Rights.

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