CHRB Corporate Human Rights Benchmark

# Corporate Human Rights Benchmark 2022 Company Scoresheet

World Benchmarking Alliance

The CHRB is part of the WBA

| | |
|---|---|
| **Company Name** | Hewlett Packard Enterprise |
| **Industry** | ICT (Supply Chain only) |
| **Overall Score** | 39.1 out of 100 |

| Theme Score | Out of | For Theme |
|---|---|---|
| 5.9 | 10 | A. Governance and Policies |
| 11.5 | 25 | B. Embedding Respect and Human Rights Due Diligence |
| 8.0 | 20 | C. Remedies and Grievance Mechanisms |
| 5.8 | 25 | D. Performance: Company Human Rights Practices |
| 7.8 | 20 | E. Performance: Responses to Serious Allegations |

Please note that any small differences between the Overall Score and the added total of Measurement Theme scores are due to rounding the numbers at different stages of the score calculation process.

Please note also 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 2022 Methodology document for the sector concerned. 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

## A. Governance and Policies (10% of Total)

### A.1 Policy Commitments (5% of Total)

| Indicator Code | Indicator name | Score (out of 2) | Explanation |
|---|---|---|---|
| A.1.1 | Commitment to respect human rights | 2 | The individual elements of the assessment are met or not as follows:<br>Score 1<br>• Met: General HRs commitment: The Company states in its Human Rights Policy that it 'upholds and respects human rights as defined by the United Nations Universal Declaration of Human Rights (UDHR) through our commitment to upholding the United Nations Guiding Principles on Business and Human Rights (UNGPs)'. [Human Rights Policy, 2022: hpe.com]<br>Score 2<br>• Met: Commitment to the UNGPs: The Company states in its Human Rights Policy that it 'upholds and respects human rights as defined by the United Nations Universal Declaration of Human Rights (UDHR) through our commitment to upholding the United Nations Guiding Principles on Business and Human Rights (UNGPs)'. [Human Rights Policy, 2022: hpe.com] |
| A.1.2.a | Commitment to respect the human rights of workers: ILO Declaration on Fundamental Principles and Rights at Work | 2 | The individual elements of the assessment are met or not as follows:<br>Score 1<br>• Met: Company has a commitment to the ILO Core: The Company states in its Human Rights Policy that it 'upholds and respects human rights as defined by the United Nations Universal Declaration of Human Rights (UDHR) through our commitment to upholding […] the International Labour Organization (ILO) eight core conventions (covering Fundamental Principles and Rights at Work, including forced labor, child labor, freedom of association—right to organize and collective bargaining, and discrimination)'. [Human Rights Policy, 2022: hpe.com]<br>• Met: Company has a explicit commitment to All four ILO Core: The Company states in its Human Rights Policy that it 'upholds and respects human rights as defined by the United Nations Universal Declaration of Human Rights (UDHR) through our commitment to upholding […] , the International Labour Organization |

| Indicator Code | Indicator name | Score (out of 2) | Explanation |
|---|---|---|---|
| | | | (ILO) eight core conventions (covering Fundamental Principles and Rights at Work, including forced labor, child labor, freedom of association—right to organize and collective bargaining, and discrimination)'. [Human Rights Policy, 2022: hpe.com]<br>Score 2<br>• Met: Company expect suppliers to commit to ILO Core: See below. [Supplier Code of Conduct, 2022: hpe.com]<br>• Met: Company explicitly list All four ILO for 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. In situations where right to freedom of association and collective bargaining is restricted by local regulation, suppliers shall allow and actively engage with alternate forms of worker representation'. [Supplier Code of Conduct, 2022: hpe.com] |
| A.1.2.b | Commitment to respect the human rights of workers: Health and safety and working hours | 0.5 | The individual elements of the assessment are met or not as follows:<br>Score 1<br>• Met: Commitment to respect H&S of workers: 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 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, 2021: hpe.com]<br>• Not Met: Respect ILO labour standards on working hours or Commits to 48 hours regular work week<br>Score 2<br>• Met: Expect suppliers to commit to H&S of their workers: 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, 2022: hpe.com]<br>• Met: Expect suppliers to commit to ILO labour standard or to 48 hours regular work week: 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. Suppliers should not schedule workers for more than 48 hours in a regular workweek. All overtime must be voluntary. Workers shall be provided sufficient rest including breaks, rest between shifts, holiday, and allowed at least one day off every seven days'. It also adds that 'Workers shall be compensated for overtime at pay rates greater than regular hourly rates, and this overtime pay must be paid in compliance with local law'. [Supplier Code of Conduct, 2022: hpe.com] |
| A.1.3.a.ICT | Commitment to respect human rights particularly relevant to the industry – responsible sourcing of minerals (ICT) | 1 | The individual elements of the assessment are met or not as follows:<br>Score 1<br>• Met: Responsible mineral sourcing: The Company indicated in its Conflict Minerals Report 2019 that it 'is committed to the responsible sourcing of minerals used in its products, and expects its suppliers to conduct their worldwide operations in a socially and environmentally responsible and sustainable manner'. On the other hand, the Company indicates in its Human Rights Policy: 'We have a responsibility to ensure that the materials used to make HPE products— including metals found in most technology products such as tin, tantalum, tungsten, and gold—are ethically sourced. [...]Through our responsible minerals program, we work to advance the responsible sourcing of minerals from CAHRAs used in our products. We strive to improve the transparency of mineral sourcing within our supply chain and achieve DRC conflict-free sourcing for our products. Ultimately, we aim to improve conditions in CAHRAs identified by the presence of armed conflict, widespread violence, or other human rights abuses'. [Human Rights Policy, 2022: hpe.com] & [Conflict Minerals Report 2020, 2021: assets.ext.hpe.com]<br>• Met: Based on OECD Guidance: The Company states that 'we designed our due diligence measures to conform with applicable portions of the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (Third Edition, OECD, 2016) and the related supplements'. [Conflict Minerals Report 2020, 2021: assets.ext.hpe.com] |

| Indicator Code | Indicator name | Score (out of 2) | Explanation |
|---|---|---|---|
| | | | • Met: Requires suppliers to commit to responsible mineral sourcing: In its Supplier Code the Company indicates: 'Suppliers shall adopt a policy and exercise due diligence on the source and chain of custody of the tantalum, tin, tungsten, and gold ("3TG") in the products, parts, components, and materials they manufacture to reasonably assure that they are sourced in a way consistent with the Organisation for Economic Co-operation and Development (OECD) Guidance for Responsible Supply Chains of Minerals from Conflict Affected and High-Risk Areas ("OECD Guidance") or an equivalent and recognized due diligence framework'. [Supplier Code of Conduct, 2022: hpe.com]<br>Score 2<br>• Not Met: Commits to follow OECD Guidance for all minerals<br>• Not Met: Suppliers expected to make similar requirements of their suppliers |
| A.1.3.b.ICT | Commitment to respect human rights particularly relevant to the industry – vulnerable groups (ICT) | 1.5 | The individual elements of the assessment are met or not as follows:<br>Score 1<br>• Met: Women's rights: The Company states in its Supplier Code of Conduct, referring to itself: '[...] we respect the rights of vulnerable groups (including migrants, children, and women) and all individuals in accordance with the core ILO conventions and the Convention on the Rights of the Child'. [Supplier Code of Conduct, 2022: hpe.com]<br>• Met: Children's rights: The Company states in its Supplier Code of Conduct, referring to itself: '[...] we respect the rights of vulnerable groups (including migrants, children, and women) and all individuals in accordance with the core ILO conventions and the Convention on the Rights of the Child'. [Supplier Code of Conduct, 2022: hpe.com]<br>• Met: Migrant worker's rights: As indicated above, the Company states that it respects 'the rights of vulnerable groups (including migrants, children, and women)'. In addition, the Company has a specific document to protect Migrants from inadequate recruitment practices: 'Supply Chain Foreign Migrant Worker Standard'. In this policy, the Company states: 'set forth the minimum requirements for the appropriate and ethical recruitment, employment and management of, and support for migrant workers by or on behalf of suppliers doing business with Hewlett Packard Enterprise (HPE).' [Migrant worker standards, 2021: hpe.com] & [Supplier Code of Conduct, 2022: hpe.com]<br>• Met: Expects suppliers to respect at least one of these rights: As indicated above, the Company has a specific supply chain foreign migrant worker standards ' for the appropriate and ethical recruitment, employment and management of, and support for migrant workers by or on behalf of suppliers doing business with Hewlett Packard Enterprise (HPE)'. [Migrant worker standards, 2021: hpe.com]<br>Score 2<br>• Not Met: CEDAW/Women's Empowerment Principles<br>• Met: Child Rights Convention/Business Principles: As indicates above, the Company states in its Supplier Code of Conduct, referring to itself: 'we respect the rights of vulnerable groups (including migrants, children, and women) and all individuals in accordance with the core ILO conventions and the Convention on the Rights of the Child'. [Supplier Code of Conduct, 2022: hpe.com]<br>• Not Met: Convention on migrant workers<br>• Not Met: Expecting suppliers to respect these rights: The Company makes reference, in its feedback to CHRB, to the document ´Commitment to Respect the Rights of Marginalized Groups reference guide´ and to its ´Supplier Code of Conduct´. Although both documents were drafted in in consultation with standards and publications such as the ´United Nations Convention on the Elimination of All Forms of Discrimination Against Women´, United Nations Convention on the Rights of the Child, among other, no evidence found that the Company expects suppliers to committing it to respect women's rights also refers to the relevant part(s) of the Convention on the Elimination of Discrimination Against Women (CEDAW) or of the Women's Empowerment Principles or the company's publicly available policy statement committing it to respect children's rights also refers to the relevant part(s) of the Convention on the Rights of the Child or of the Children's Rights and Business Principles or the company's publicly available policy statement committing it to respect migrant workers' rights also refers to the relevant part(s) of the International Convention on the Protection of the Rights of All Migrant Workers and Members of Their Families. Consulting those standards doesn't imply a commitment to them. [Supplier Code of Conduct, 2022: hpe.com] & [Commitment to Respect the Rights of Marginalized Groups reference guide, N/A: hpe.com] |

| Indicator Code | Indicator name | Score (out of 2) | Explanation |
|---|---|---|---|
| A.1.4 | Commitment to remedy | 2 | The individual elements of the assessment are met or not as follows:<br>Score 1<br>• Met: The Company commits to remedy: The Company states in its Human Rights Policy: 'HPE commits to: […] Complete due diligence to avoid complicity in human rights violations. Our due diligence process includes: […] Promptly investigating allegations and pursuing action to remedy and mitigate any adverse human rights impacts'. It also commit to, in the context of mechanism to seek remedy, to 'maintain processes for escalating, investigating, and remedying critical findings in our own operations and that of our suppliers and other partners [...] support remedy of any actual adverse impacts that may occur, whether wholly or in part due to our actions or inactions'. [Human Rights Policy, 2022: hpe.com] & [2018 Living Progress Report, 05/2019: assets.ext.hpe.com]<br>• Met: Company expect suppliers to make this commitment: The Company indicates in its Supplier Code: 'Suppliers shall provide or cooperate in remediation for workers or other affected individuals, where the supplier has caused or contributed to adverse impacts. Suppliers will engage workers or other affected individuals to ensure effective and complete remedy. HPE works with suppliers, providing guidance and support where linked to HPE business'. [Supplier Code of Conduct, 2022: hpe.com]<br>Score 2<br>• Met: Collaborating with other remedy initiatives: Also in its Human Rights Policy: 'HPE prohibits the use of retaliation of any form, and as appropriate cooperate—and not obstruct—remedy through judicial and non-judicial mechanisms. We also benefit from additional third-party channels including those managed by RBA and RMI'. [Human Rights Policy, 2022: hpe.com]<br>• Met: Work with suppliers to remedy impact: The Company indicates in its Supplier Code with respect remediation for workers or other affected individuals: 'HPE works with suppliers, providing guidance and support where linked to HPE business.' In addition, in its Human Rights Policy, it states: 'HPE commits to:[...] Support remedy of any actual adverse impacts that may occur, whether wholly or in part due to our actions or inactions. HPE seeks to apply leverage and encourage responsible parties to assess conditions and implement corrective actions, even in circumstances where HPE is not directly linked to an identified adverse impact. We take action to influence any adverse impacts that may be linked to us and engage with peers and other partners on collective remedy, including collaboration with suppliers'. [Supplier Code of Conduct, 2022: hpe.com] & [Human Rights Policy, 2022: hpe.com] |
| A.1.5 | Commitment to respect the rights of human rights defenders | 2 | The individual elements of the assessment are met or not as follows:<br>Score 1<br>• Met: Zero tolerance attacks on HRs Defenders (HRDs): The HR policy states that it commits to 'demonstrate our respect for the human rights of all individuals in our value chain and where we live and work, with particular concern for identifying, understanding, and reducing risk of negative impact to those most vulnerable (including [...] human rights defenders)'. It's Supplier Code reads: 'Suppliers must also share and uphold HPE's commitment to respect the rights of human rights defenders, and allow them to exercise their rights to freedom of expression without threats, intimidation, or attacks'. [Supplier Code of Conduct, 2022: hpe.com]<br>• Met: Company expect suppliers to make this commitment: The supplier code states that 'Suppliers must also share and uphold HPE's commitment to respect the rights of human rights defenders, and allow them to exercise their rights to freedom of expression without threats, intimidation, or attacks'. [Supplier Code of Conduct, 2022: hpe.com]<br>Score 2<br>• Met: Work with HRD to create safe and enabling environment: The Company states in its Human Rights Policy: 'when we have caused or contributed to actual harm in our business or supply chain, we commit to working with representatives and human rights defenders to inform and improve our approach and enable safe environments for raising concerns'. [Human Rights Policy, 2022: hpe.com] |

## A.2 Policy Commitments (5% of Total)

| Indicator Code | Indicator name | Score (out of 2) | Explanation |
|---|---|---|---|
| A.2.1 | Commitment from the top | 2 | The individual elements of the assessment are met or not as follows:<br>Score 1<br>• Met: Board level responsibility for HRs: 'HPE Board of Directors' Nominating, Governance, and Social Responsibility Committee: Guides HPE's global citizenship activities, providing strategic direction on policies and programs covering topics such as human rights, privacy, sustainability, and corporate social responsibility; Identifies, evaluates, and monitors matters that could significantly affect the company's reputation or operations, including social, political, regulatory, and environmental concerns; Oversees our Political Action Committee, government affairs, and public policy engagement. [Living the progress Report 2019, 05/2020: assets.ext.hpe.com]<br>• Met: Describe HR expertise of Board member: The 2022 Proxy Statement indicates, in its Board of Directors Skills and Qualifications that four Board members have ´Social: Experience in advocating for gender and racial equality, human rights, and effective corporate citizenship ensures that the Company remains at the forefront of ensuring social justice, diversity and inclusivity´. [2022 Proxy Statement, 2022: annualmeeting.hpe.com]<br>Score 2<br>• Met: Speeches/letters by Board members or CEO: The Company's CEO spoke at the latest World Economic Forum annual meeting in Davos on ending modern slavery and the Company's approach to social and environmental responsibility, including human rights. [World Economic Forum: Ending Modern Slavery - Video, 01/2019: webcasts.weforum.org] & [Live from the World Economic Forum Annual Meeting in Davos, 17/01/2019: hpe.com] |
| A.2.2 | Board responsibility | 1 | The individual elements of the assessment are met or not as follows:<br>Score 1<br>• Met: Board/Committee review HRs strategy: In its 2019 Corporate Responsibility Report, the Company indicates: 'HPE Board of Directors' Nominating, Governance, and Social Responsibility Committee (NGSR): […] Identifies, evaluates, and monitors matters that could significantly affect the company's reputation or operations, including social, political, regulatory, and environmental concerns.' In addition, according its Charter 'The purpose of the Nominating, Governance and Social Responsibility Committee (the "Committee") of the Board of Directors (the "Board") of Hewlett Packard Enterprise Company ("Hewlett Packard Enterprise") is: […] To review, assess, report and provide guidance to management and the full Board regarding Hewlett Packard Enterprise's policies and programs relating to global citizenship (which includes, among other things, human rights, […] and corporate social responsibility) and the impact of Hewlett Packard Enterprise's operations on employees, customers, suppliers, partners and communities worldwide, as well as reviewing the annual Living Progress Report; […] The Committee convenes at least four times each year, with additional meetings as appropriate'. [Living the progress Report 2019, 05/2020: assets.ext.hpe.com] & [Nominating, Governance and Social Responsibility Committee Charter, 07/2019: investors.hpe.com]<br>• Met: Examples/trends re HR discussion in the last reporting period: The 2022 Proxy Statement indicates: The Board approves HPE's annual Modern Slavery Transparency Statement, and the Audit Committee approves HPE's annual Conflict Minerals Disclosure filed with the U.S. Securities and Exchange Commission. Our human rights program also falls within our broader ESG strategy, policies, and public disclosures, which are led by our Chief Sustainability Officer and overseen by the Board's NGSR Committee. […] Throughout the year, the Board, our executives, CECO, and COLO review emerging human rights trends, including salient risks, stakeholder perspectives, and HPE's approach to mitigating those risks. In 2021, we substantially revised our Global Human Rights Policy, highlighting six salient human rights risks — (1) responsible use of our products, (2) responsible product development, (3) modern slavery and decent work, (4) responsible sourcing of minerals, (5) inclusion & diversity, and (6) water use — which have been identified through a company-wide human rights risk assessment conducted by a third-party human rights expert. We continuously monitor these human rights risks and perform thorough due diligence to avoid complicity in human rights violations´. [2022 Proxy Statement, 2022: annualmeeting.hpe.com]<br>Score 2<br>• Met: Meets both requirements under score 1<br>• Not Met: How affected stakeholders/HR experts informed discussions |

| Indicator Code | Indicator name | Score (out of 2) | Explanation |
|---|---|---|---|
| A.2.3 | Incentives and performance management | 0 | The individual elements of the assessment are met or not as follows:<br>Score 1<br>• Not Met: Incentives for at least one board member: The Company indicates in its Living Progress Report 2020: 'Our diversity targets are tied to incentive compensation for HPE executives and our diversity scorecard progress is reviewed quarterly with the Board of Directors.' However, no further information was found describing the incentive mechanism and if it applies to a Board member.<br>• Not Met: At least one key HR risk, beyond employee H&S<br>Score 2<br>• Not Met: Performance criteria made public<br>• Not Met: Review of other board performance criteria |
| A.2.4 | Business model strategy and risks | 0 | The individual elements of the assessment are met or not as follows:<br>Score 1<br>• Not Met: Board process to review bussiness model and strategy: The 2022 Proxy Statement indicates: ´We win the right way, holding ourselves, our suppliers, and our partners to the highest ethical standards. We protect our customers' reputations by upholding human rights, promoting accountability, and building security into everything we do. We share a responsibility to protect people and the environment and uphold these standards in our innovation principles, business decisions, and procurement choices. In this area, we focus on corporate governance and ethical behavior, ethical sourcing, human rights, data security, privacy, and public policy´. It then elaborates on its ethical sourcing and Human Rights approach´. It also indicates Human Rights oversight at Board level and its Human Rights management. Similar information is found in its 2021 Proxy Statement and in the 2021 Modern Slavery Statement. Finally, the Executive Vice President, Chief Operating and Legal Officer indicates, in a blog post: ´Our board of directors, my fellow executives and I have ultimate accountability over our human rights performance. Throughout the year, we review human rights trends, specific risks, and our approach to mitigating those risks. At the executive level, our Ethics & Compliance Committee frequently engages on these issues. At the Board level, our Nominating, Governance and Social Responsibility Committee oversees HPE's ESG strategy, policies, and public disclosures, and our Audit Committee engages on human rights risk through our annual ethics and compliance risk review´. However, although the Company provides comprehensive information on how it manages its Human Rights approach, it is not clear the process it has in place to discuss and review its business model and strategy for inherent risks to human rights at board level or a board committee. [2022 Proxy Statement, 2022: annualmeeting.hpe.com] & [Accelerating our commitment to human rights (web), N/A: hpe.com]<br>• Not Met: Describe frequency and triggers for reviewing<br>Score 2<br>• Not Met: Meets both requirements under score 1<br>• Not Met: Example of actions decided |

# B. Embedding Respect and Human Rights Due Diligence (25% of Total)

## B.1 Embedding Respect for Human Rights in Company Culture and Management Systems (10% of Total)

| Indicator Code | Indicator name | Score (out of 2) | Explanation |
|---|---|---|---|
| B.1.1 | Responsibility and resources for day-to-day human rights functions | 1.5 | The individual elements of the assessment are met or not as follows:<br>Score 1<br>• Met: Score of 1 on A.1.2.a: See indicator A.1.2.a<br>• Met: Senior responsibility for HR implementation and decision making: In its 2020 Living Progress Report, the Company indicates that the HPE Living Progress Strategy Council has the following responsibilities: '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 and external stakeholders; Endorses materiality assessments and reporting activities. In 2020, we expanded the Living Progress Strategy Council to include a wider range of internal stakeholders who will ensure best-in-class ESG performance continues to be a part of our culture and value proposition. The Council is co-chaired by the senior vice presidents of our Corporate Affairs and Legal organizations'. [2020 Living Progress Report, 2021: hpe.com] |

| Indicator Code | Indicator name | Score (out of 2) | Explanation |
|---|---|---|---|
| | | | Score 2<br>• Met: How it assigns Day-to-day responsibility: It also states that 'The Corporate Affairs team communicates with the HPE Board of Directors on issues including risks, impacts, target setting, and resiliency. In addition, Corporate Affairs provides regular updates to the NGSR Committee regarding ESG matters and the company's approach to managing them, with particular emphasis on matters that pose material risk to the business. [...] The HPE Office of Operations, Legal, and Administrative Affairs (OLAA) guides our approach and works across the business to address specific issues as they arise. Our Human Rights program, which is part of HPE's Global Social and Ethical Responsibility team and sits within OLAA, supervises the day-to-day oversight responsibilities of our human rights policies and initiatives.' In addition, in its MS statement 2020: 'The SER Team is responsible for establishing and coordinating the policies, processes, and programs governing HPE's approach to human rights and ethical conduct in the supply chain. The SER Team works closely with dedicated individuals in the product supply chain, indirect procurement, corporate affairs, and other internal organizations to implement and manage these policies, processes, and programs across HPE's operations and supply chain.' The 2022 Proxy Statement also indicates: ´Our strategy is also informed by the Living Progress Strategy Council, a cross-functional team of executives who ensure best-in-class ESG performance across organizations such as Corporate Affairs, Legal, Human Resources, Global Operations, Ethics and Compliance, and Corporate Strategy´. [2020 Living Progress Report, 2021: hpe.com] & [MSA 2020, 2021: hpe.com]<br>• Not Met: Day-to-day resources and expertise allocation in own ops: In its feedback to CHRB, the Company refers to the webpage section Supply Chain Responsibility and to the webpage section AI Ethics and Principles. The 2021 Modern Slavery Statement discloses examples of trainings, collaborations, advocacy, activities to address modern slavery. The 2021 Living Progress Report indicates: ´On a day-to-day basis, our Living Progress team leads the effort to set HPE's ESG strategy by identifying, evaluating, and addressing ESG risks and opportunities in coordination with subject matter experts across our business´. It also notes that the Global Human Rights Policy ´highlights six salient human rights risks identified through a company-wide assessment conducted by a third-party´. The 2022 Proxy Statement reiterates Board and executive responsibilities for the Company´s Human Rights management. However, although the Company indicates some of its many efforts to carry out its Human Rights commitments, it is not clear the resources/ expertise allocation for the day-to-day management of relevant human rights issues within its own operations (i.e people with specific knowledge adopting human rights perspective, people devoted to human rights management, etc). [2021 Modern Slavery Transparency Statement, 04/2022: hpe.com] & [2021 Living Progress Report, 2022: assets.ext.hpe.com]<br>• Met: Resources and expertise allocation in the supply chain: The 2021 Modern Slavery Statement discloses examples of trainings, collaborations, advocacy, activities to address modern slavery. It also indicates: ´Our approach and activities to address modern slavery are driven by the Global Social and Environmental Responsibility (SER) Team in the Ethics and Compliance Office, which resides within the Office of Legal and Administrative Affairs. This team of five, led by our Vice President of Anti-Corruption & SER, and accountable to our Chief Ethics and Compliance Officer, works in partnership with social and environmental colleagues on HPE's Corporate Affairs team to enforce our policies and commitments relating to the United Nations Guiding Principles on Business and Human Rights (UNGPs) and the principles set forth in the International Labour Organization (ILO) eight core conventions. The SER team provides support, guidance and resources with our partners in global sourcing teams. We partner with local country counsel, other members of local legal teams, operations and sales teams, and in consultation with the boards of our subsidiary entities, as appropriate, to develop, adopt, and approve statements that are responsive to local requirements´. [2021 Modern Slavery Transparency Statement, 04/2022: hpe.com] |
| B.1.2 | Incentives and performance management | 0.5 | The individual elements of the assessment are met or not as follows:<br>Score 1<br>• Met: Senior manager incentives for human rights: The Company indicates in its 2020 Living Progress Report : 'We link a portion of senior management compensation to ESG factors and reward team members for delivering near-term results and long-term sustainable value. For instance, in order to enhance our human capital value, the HPE management by objectives (MBO) approach includes performance targets for retaining top talent and meeting organizational diversity targets'. Additionally, the 2021 Living Progress notes: 'The HPE Executive Council, including our Chief Operating Officer and CEO, directly oversees the company's ESG |

| Indicator Code | Indicator name | Score (out of 2) | Explanation |
|---|---|---|---|
| | | | strategy, with management goals and executive compensation tied to diversity and climate targets'. It also indicates its ESG targets, including: 'Increase representation of women and ethnically diverse talent by at least 1 percentage point year-over-year; Increase representation of women in executive roles by at least 1 percentage point year-over-year'. [2020 Living Progress Report, 2021: hpe.com] & [2021 Living Progress Report, 2022: assets.ext.hpe.com]<br>• Not Met: At least one key HR risk, beyond employee H&S<br>Score 2<br>• Not Met: Performance criteria made public<br>• Not Met: Review of other senior management performance |
| B.1.3 | Integration with enterprise risk management | 0.5 | The individual elements of the assessment are met or not as follows:<br>Score 1<br>• Met: HR risks is integrated as part of enterprise risk system: The Company indicates in its 2020 Living Progress Report: 'Our Enterprise Risk Management (ERM) program assesses and monitors company risk. The program is overseen by HPE's Chief Financial Officer and supported by the HPE Executive Risk Council, composed of an executive from every function and business unit across the company. ERM reports to the Audit Committee of the board quarterly and to the full Board of Directors annually. Select board committees also have responsibilities for oversight of risk management, for instance the NGSR Committee oversees risks associated with ESG matters and the Human Resources and Compensation Committee oversees employee relations topics including inclusion and diversity and pay equity'. Risks in the annual report describe the following: 'If we were to violate or become liable under environmental or certain ESG-related laws or if our products become non-compliant with such laws or market access requirements, our customers may refuse to purchase our products, and we could incur costs or face other sanctions, such as restrictions on our products entering certain jurisdictions, fines, and/or civil or criminal sanctions'. The Human rights policy states that provide impact assessments to senior leaders, in addition to recommendations and/or guidance on preventing and mitigation of risk. [2020 Living Progress Report, 2021: hpe.com] & [Annual Report 2021, 2021: annualmeeting.hpe.com]<br>• Not Met: Provides an example<br>Score 2<br>• Not Met: Audit Ctte or independent risk assessment |
| B.1.4.a | Communication /dissemination of policy commitment(s) to workers and external stakeholders | 1 | The individual elements of the assessment are met or not as follows:<br>Score 1<br>• Met: Score of 1 on A.1.2.a: See indicator A.1.2.a<br>• Met: Communicates its policy to all workers in own operations: In its 2019 Living Progress Report, the Company indicates that its training and communication approach includes: 'requiring all team members to complete SBC [Standards of Business Conduct] training, with new hires required to complete it within 30 days of joining HPE, Board members take SBC training every two years'. The 2021 Modern Slavery Statement indicates: 'All HPE employees must complete annual training on the HPE SBC. [...]. The SBC requires, and associated annual training emphasizes, the importance of employees treating others with integrity, respect, and fairness´. The 2021 Living Progress indicates: ´Monitoring and enforcing human rights is a responsibility of the entire company, and we provide and track mandatory training for all new employees on our global human rights policy. Additional human rights trainings were launched in 2021 targeting specific groups [...]'. [Living the progress Report 2019, 05/2020: assets.ext.hpe.com] & [2021 Living Progress Report, 2022: assets.ext.hpe.com]<br>Score 2<br>• Not Met: Communication of policy commitments to stakeholder: In its feedback to CHRB to Company provided evidence various sources with evidence that it communicates its policy commitments to workers. However, no description found of how it communicates its policy commitments to affected stakeholders, including local communities.<br>• Not Met: How policy commitments are made accessible to audience |
| B.1.4.b | Communication /dissemination of policy commitment(s) to business relationships | 2 | The individual elements of the assessment are met or not as follows:<br>Score 1<br>• Met: Meets ILO requirement for suppliers on A.1.2.a: See indicator A.1.2.a<br>• Met: Requires suppliers to communicate policy requirements: In its Supplier SER Agreement, the Supplier 'confirms that it has read Hewlett Packard Enterprise Supplier Code of Conduct […] and Hewlett Packard Enterprise's General Specification for the Environment and agrees with its statement of requirements.' In its Supplier Code, the Company indicates: 'The HPE Code is a total supply chain requirement. At a minimum, Suppliers shall require their next tier Suppliers to |

| Indicator Code | Indicator name | Score (out of 2) | Explanation |
|---|---|---|---|
| | | | acknowledge and implement the HPE Code and flow down the requirements of the HPE Code down to their sub-tier Suppliers. The requirements of the HPE Code apply to all workers including temporary, migrant, student, contract, direct employees, and any other type of worker.' [Supplier Code of Conduct, 2022: hpe.com] & [SER Agreement, 07/2017: h20195.www2.hpe.com]<br>Score 2<br>• Met: How HR commitments made binding/contractual: See above. Human rights requirements (contained in the code) is part of the SER agreement.<br>• Met: Company requires suppliers to cascade down to their suppliers: As indicated above, the code is a 'total supply chain requirement.' and 'At a minimum, Suppliers shall require their next tier Suppliers to acknowledge and implement the HPE Code and flow down the requirements of the HPE Code down to their sub-tier Suppliers.'. [Supplier Code of Conduct, 2022: hpe.com] |
| B.1.5 | Training on Human Rights | 2 | The individual elements of the assessment are met or not as follows:<br>Score 1<br>• Met: Scores at least 1 on A.1.2.a: See indicator A.1.2.a<br>• Met: How workers are trained on HR policy commitments: In its Living 2019 Progress Report, the Company indicates that its training and communication approach includes: 'requiring all team members to complete SBC training [Standards of Business Conduct], with new hires required to complete it within 30 days of joining HPE, Board members take SBC training every two years'. The 2021 Modern Slavery Statement indicates: 'All HPE employees must complete annual training on the HPE SBC. The SBC specifically prohibits child labor, prison or forced labor, and physical punishment throughout our operations, or those of our business partners or suppliers. The SBC requires, and associated annual training emphasizes, the importance of employees treating others with integrity, respect, and fairness'. Moreover, the 2021 Living Progress indicates: 'Monitoring and enforcing human rights is a responsibility of the entire company, and we provide and track mandatory training for all new employees on our global human rights policy'. [Living the progress Report 2019, 05/2020: assets.ext.hpe.com] & [2021 Modern Slavery Transparency Statement, 04/2022: hpe.com]<br>• Met: Trains relevant managers including procurement: See above. In its Modern Slavery Statement 2020, it adds: 'HPE provides training courses on key SCR issues and on effective management of suppliers' SCR performance. This training is broadly available, but aimed at staff who engage with any aspect of HPE's SCR program (e.g., procurement, quality control).' The 2021 Living Progress indicates: 'Monitoring and enforcing human rights is a responsibility of the entire company, and we provide and track mandatory training for all new employees on our global human rights policy. Additional human rights trainings were launched in 2021 targeting specific groups such as sourcing teams—on responsible purchasing practices and supply chain responsibility challenges such as modern slavery and working hours—and sales, legal, government affairs, and leadership in high-risk countries—on responsible use due diligence'. [2021 Living Progress Report, 2022: assets.ext.hpe.com] & [MSA 2020, 2021: hpe.com]<br>Score 2<br>• Met: Score of 2 on A.1.2.a: See indicator A.1.2.a<br>• Met: Meets both requirements under score 1: See above.<br>• Met: Trains suppliers to meet company's HR commitment: The 2021 Modern Slavery Statement indicates: 'For the past several years, we have partnered with other leading IT companies, including several of our competitors and suppliers, to conduct these training sessions. By taking this collaborative approach, we reinforce our industry's commitment on this issue and deepen the reach of the program beyond our first-tier suppliers. […] Our live, facilitated trainings on human rights, conflict minerals, forced labor, hours, and health and safety reached a total of 313 participants, and approximately 62% of our suppliers in our program (which covers tier 1 and 2 suppliers who account for 98% of our supply chain spend)'. [2021 Modern Slavery Transparency Statement, 04/2022: hpe.com]<br>• Met: Disclose % trained: The 2021 Modern Slavery Statement indicates: 'Our live, facilitated trainings on human rights, conflict minerals, forced labor, hours, and health and safety reached a total of 313 participants, and approximately 62% of our suppliers in our program (which covers tier 1 and 2 suppliers who account for 98% of our supply chain spend)'. [2021 Modern Slavery Transparency Statement, 04/2022: hpe.com] |
| B.1.6 | Monitoring and corrective actions | 0.5 | The individual elements of the assessment are met or not as follows:<br>Score 1<br>• Met: Scores at least 1 on A.1.2.a: See indicator A.1.2.a<br>• Not Met: Monitoring implementation of HR policy commitments across global ops and supply chain: In its Modern Slavery Act Statement, the Company states: |

| Indicator Code | Indicator name | Score (out of 2) | Explanation |
|---|---|---|---|
| | | | 'We conduct verification of supplier conformance through multiple means. We use supplier SAQs, comprehensive audits, specialized assessments, and our key performance indicator program. We also promptly investigate any third-party allegations related to forced labor, bonded labor, and human trafficking. Comprehensive, independent third-party audits evaluate supplier performance against our Supplier Code of Conduct, including the provisions on freely chosen employment. The majority of these audits are conducted through the RBA Validated Assessment Process (VAP). We supplement these audits with specialized assessments that target key risk areas, such as recruitment and employment practices for foreign migrant workers. These assessments are carried out by independent third-party auditors with specific expertise related to the issue area.' In addition, in its Living the progress Report: 'We undertake regular, independent audits against our Supplier Code of Conduct and include Social and Environmental Responsibility (SER) indicators in our supplier scorecard, ensuring supplier performance against social and environmental factors is demonstrated and considered in our supplier selection criteria'. However, no evidence found describing how the Company monitors the implementation of human rights policy commitments in its own operations. [MSA 2020, 2021: hpe.com] & [Living the progress Report 2019, 05/2020: assets.ext.hpe.com]<br>• Not Met: Proportion of supply chain monitored: The Company reports in its MSA 2020: 'In FY20, 71 site audits and assessments were conducted at supplier facilities.' However, it is not clear the percentage/proportion to the supply chain that this figure represents. [MSA 2020, 2021: hpe.com]<br>• Not Met: Describe how workers are involved in monitoring<br>Score 2<br>• Met: Score of 2 on A.1.2.a: See indicator A.1.2.a<br>• Met: Describes corrective action process: It also states: 'In any event, in a case of non- conformance, a supplier is required to produce a corrective action plan to outline how it intends to resolve the issue. HPE then reviews the plan and approves or requires further refinement. A supplier must cease any practice that contributes to a critical labor issue and must promptly report its corrective actions to HPE for review and feedback. Hewlett Packard Enterprise or a third-party auditor will then re-examine the finding through a site visit to confirm resolution'. [MSA 2020, 2021: hpe.com]<br>• Met: Disclose findings and number of corrective action: The Company reports: 'We identified one critical finding related to risks of forced labor in our supply chain in FY20, which was a case of workers paying recruitment fees to recruitment agencies in their home countries. HPE worked intensively with the supplier, as we do in each instance of a critical finding, to ensure all workers were fully reimbursed within three months of the critical finding, and the supplier improved its policies, agreements, and systems for identifying and preventing such recruitment fees. HPE also worked with the supplier to improve worker awareness of the policy against recruitment fees and worker trust in the effectiveness of available grievance channels.' In addition, it discloses information about the total number of non-conformances in its Living Progress 2020 Data Summary: 135 (49 Health and Safety, 54 Labor, 26 Environmental, 5 Management Systems, 1 Ethics). [MSA 2020, 2021: hpe.com] & [Data Summary 2020, 2021: hpe.com] |
| B.1.7 | Engaging and terminating business relationships | 2 | The individual elements of the assessment are met or not as follows:<br>Score 1<br>• Met: HR affects selection of suppliers: The Company indicates in its 'Supply Chain Responsibility: Our approach' document: 'We build ethical criteria into supplier selection and onboarding. We consider the risk profile of every supplier and conduct a formal preliminary risk assessment. Key suppliers also undergo site-based onboarding assessments. This motivates suppliers to value SER performance and build relevant standards into their management systems early in the business relationship. We assess the following risk factors: Location […]; Procurement category […]; External stakeholder reports […]; Supplier-specific factors […]'. [Supply chain responsibility – Our approach, 2022: hpe.com]<br>• Met: HR affects on-going supplier relationships: In its 'Supply Chain Responsibility: Our Approach' document, the Company indicates: 'Our SER Scorecard ties ongoing procurement decisions to supplier SER performance and participation in capability building. Suppliers with strong SER performance improve their opportunities for new or expanded business. Suppliers with poor SER performance risk a reduction in the business.' [Supply chain responsibility – Our approach, 2022: hpe.com]<br>Score 2<br>• Met: Describe positive incentives offered to respect human rights: In its 'Supply Chain Responsibility: Our approach' document, the Company indicates: 'Our SER |

| Indicator Code | Indicator name | Score (out of 2) | Explanation |
|---|---|---|---|
| | | | Scorecard ties ongoing procurement decisions to supplier SER performance and participation in capability building. Suppliers with strong SER performance improve their opportunities for new or expanded business. Suppliers with poor SER performance risk a reduction in the business. The SER Scorecard includes a management system component, which enables suppliers to demonstrate integration of SER issues within their own management systems, and to demonstrate a proactive approach on key risks'. [Supply chain responsibility – Our approach, 2022: hpe.com]<br>• Met: Working with suppliers to meet HR requirements: In addition, the Company adds: 'Capability-building programs address the most significant supply chain SER issues as identified by audit trends, external stakeholder input, and other intelligence. We often pair supplier assessments with capability-building opportunities to facilitate improvement. In conjunction with local and international NGOs and training groups, we have delivered four types of training and capability-building programs: Supplier-specific capability-building. Virtual and on-site programs that help suppliers develop sustainable management systems and remediation plans for specific SER issues;[...] Buyer engagement. Training, awareness building, and engagement with our teams responsible for purchasing and leading our relationship with suppliers. Topics include responsible purchasing practices, SER requirements and procedures, modern slavery. [...] Broad-topic capability-building. Programs, workshops, and events that address industry-wide key issues, emerging risks, and new requirements across our supply chain. Worker well-being. Programs and training with a focus on worker empowerment, worker voice, and well-being. These are based on the belief that facilitating and empowering workers enables them to influence their working conditions and building their skills can also improve their work experience, earning potential and a positive impact beyond the workplace'. [Supply chain responsibility – Our approach, 2022: hpe.com] |
| B.1.8 | Approach to engagement with affected stakeholders | 0.5 | The individual elements of the assessment are met or not as follows:<br>Score 1<br>• Met: Discloses stakeholders that HRs may be affected: In its 'Supply Chain Responsibility: Our Approach', the Company indicates: 'We engage with a broad range of stakeholders to research and better understand issues of concern regarding SER in our supply chain. These stakeholders include workers, industry bodies, governments, investors, NGOs, and human rights groups such as the Leadership Group on Responsible Recruitment, the RBA, the Business Roundtable on AI and Human Rights, the World Economic Forum, Business Against Slavery Forum, the Responsible Minerals Initiative, and the Responsible Labor Initiative. Stakeholder engagement is a critical step toward a coordinated and effective response to important social and environmental challenges.' Moreover, 'since 2021 we have been developing and advancing our overall stakeholder engagement strategy, from a human rights perspective. Our program benefits from regular dialogue with worker representatives, workers, and/or community members affected by critical issues identified in our supply chain; local NGOs; suppliers; investors; and topical experts. It states that 'Affected parties in recent years have included migrant workers, female workers, and student workers'. [Supply chain responsibility – Our approach, 2022: hpe.com]<br>• Not Met: Provides two examples of engagement with stakeholders: It also indicates: 'Workers along our supply chain are our primary stakeholder. We engage with them directly through interviews, surveys, capability building programs, and a variety of grievance channels available to workers in our supply chain. We believe the single best way to advance SCR performance is to empower workers. As such, we assess suppliers' ability to effectively engage workers and assess workers' trust in such systems, and provide guidance to suppliers on proactively listening to workers, pilot new tools for elevating worker voice. We also develop worker rights training to reinforce these actions'. No other example of particular engagement with affected stakeholders was found. [Supply chain responsibility – Our approach, 2022: hpe.com]<br>Score 2<br>• Not Met: Analysis of stakeholder views on company's HR issues<br>• Not Met: Describe how views influenced company's HR approach |

## B.2 Human Rights Due Diligence (15% of Total)

| Indicator Code | Indicator name | Score (out of 2) | Explanation |
|---|---|---|---|
| B.2.1 | Identifying human rights risks and impacts | 1.5 | The individual elements of the assessment are met or not as follows:<br>Score 1<br>• 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 2020, 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: responsible product development, responsible use, modern slavery and decent work, responsible sourcing of minerals, inclusion and diversity, and water us'. [2020 Living Progress Report, 2021: hpe.com] & [Supplement disclosure to CHRB, 19/07/2019: business-humanrights.org]<br>• Met: Identifying risks through relevant business relationships: In its Modern Slavery Statement 2020, the Company indicates: 'We work to identify emerging risks in our supply chain at global, regional, and local levels. We analyse 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: h20195.www2.hpe.com] & [MSA 2020, 2021: hpe.com]<br>Score 2<br>• Met: Describe ongoing global risk identification in consultation with stakeholder/HR experts: The 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'. In addition, as indicated above, the Company reports that it works 'to identify emerging risks in our supply chain at global, regional, and local levels. We analyse information from our supplier monitoring program, worker engagement, extensive stakeholder network, and other external sources to look for, and address risks proactively'. The Commitment to Respect the Rights of Marginalized Groups indicates: ´We seek to annually review and ensure our due diligence considers those most vulnerable and to engage affected individuals and representatives of marginalized groups to better inform and provide meaningful direction to our human rights program'. The Supply Chain Responsibility explains its approach: 'we have been building out our program according to Article One's recommendations, and are reviewing our progress, interviewing external stakeholders, and confirming our risks through our HRIA update in 2022´. In the Context of this risk-based approach, it notes: ´Workers along our supply chain are our primary stakeholder. We engage with them directly through interviews, surveys, [...]'. [Supply chain responsibility – Our approach, 2022: hpe.com] & [MSA 2020, 2021: hpe.com]<br>• Met: Triggered by new circumstances: The Supply Chain Responsibility – Our Approach indicates: 'We engage with stakeholders when conducting a human rights impact assessment (HRIA) (whether company-wide or an issue-or geo-specific) for a new sourcing country or country with a changing risk profile. Our HRIA is meant to identify/confirm and prioritize our salient human rights risks when developing or advancing our standards; collaborating to advocate for regulation that better supports migrant workers; and when an affected stakeholder, representative, worker-led monitoring group, or NGO raises a concern related to an alleged breach of our standards'. [Supply chain responsibility – Our approach, 2022: hpe.com]<br>• Not Met: Describes risks identified |
| B.2.2 | Assessing human rights risks and impacts | 1 | The individual elements of the assessment are met or not as follows:<br>Score 1<br>• Met: Describe process for assessment of HR risks and discloses salient HR issues: The Supply Chain Responsibility – Our Approach explains its risk-based approach: ´HPE conducts a regular company and value-chain wide human rights impact assessment (HRIA), and tracks and reviews risks and performance data annually. |

| Indicator Code | Indicator name | Score (out of 2) | Explanation |
|---|---|---|---|
| | | | Our 2019 HRIA, completed with the help of experts at Article One, included identification of the most salient risks […]. The saliency assessment considered geographic, economic, job, product type, and performance risks to people (as per articles in the UNDHRs). Since that time, we have been building out our program according to Article One's recommendations, and are reviewing our progress, interviewing external stakeholders, and confirming our risks through our HRIA update in 2022. When it comes to our supply chain, we conduct an in-depth review coupled with continuous risk sensing. Our supplier SER risk calculator identifies and characterizes sources of risk at a global or regional level, and at the level of individual suppliers and our own production sites based on geography, job nature, review of major findings and learnings in our own supply chain, past allegations, environmental trends, industry SER data, publications by media/NGOs/academics that provide evidence of emerging risk, dependency on migrant workers, and input from affected and potentially affected individuals such as workers. We accomplish this through the following avenues´: stakeholder engagement; external data; Supplier risk profiling and risk calculator; Performance monitoring. [Supply chain responsibility – Our approach, 2022: hpe.com]<br>• Met: How process applies to supply chain: See above, particularly, 'When it comes to our supply chain, we conduct an in-depth review coupled with continuous risk sensing. Our supplier SER risk calculator identifies and characterizes sources of risk at a global or regional level, and at the level of individual suppliers and our own production sites based on geography, job nature, review of major findings and learnings in our own supply chain, past allegations, environmental trends, industry SER data, publications by media/NGOs/academics that provide evidence of emerging risk, dependency on migrant workers, and input from affected and potentially affected individuals such as workers. We accomplish this through the following avenues´: stakeholder engagement; external data; Supplier risk profiling and risk calculator; Performance monitoring. [Supply chain responsibility – Our approach, 2022: hpe.com]<br>• Met: Public disclosure of the results of HR assessment: The Company discloses its most salient risks in its Living Progress Report 2020: 'responsible product development, responsible use, modern slavery and decent work, responsible sourcing of minerals, inclusion and diversity, and water use.' In addition, in its Modern Slavery Statement 2020, the Company indicates: 'HPE has identified the following salient 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.' [2020 Living Progress Report, 2021: hpe.com] & [MSA 2020, 2021: hpe.com]<br>Score 2<br>• Met: Meets all requirements under score 1: See above.<br>• Not Met: How it involved affected stakeholders in the assessment |
| B.2.3 | Integrating and acting on human rights risks and impact assessments | 1 | The individual elements of the assessment are met or not as follows:<br>Score 1<br>• Not Met: Action Plans to mitigate risks: The Commitment to Respect the Rights of Marginalized Groups indicates: 'We apply a risk-based approach to human rights, seeking to understand the nature of risks identified, impact of our business operations and partner operations on vulnerable groups, and how to mitigate or prevent harm'. As for 'migrant workers': 'HPE published our Migrant Worker Standard in 2015, developed specialized assessments for detecting forced labor, provides regular training and capacity building resources for suppliers, trains staff on how to spot and report potential issues and how to source responsibly, provides staff with opportunities to support organizations worldwide who are leading efforts to combat trafficking or support survivors, and works with suppliers to investigate, plan improvements, and monitor reimbursement of fees and other forced labor remediation'. Regarding 'racial and ethnic minorities': 'Going forward we seek to advance our understanding of risks to highest risk racial and ethnic groups in our value chain, improve our risk detection and mitigation efforts, and consider what proactive steps our suppliers can take to foster inclusive culture that supports minorities, eliminates workplace harassment, and helps minorities thrive. We are embedding social justice efforts into our existing programs'. However, although the Company indicates examples of actions taken to mitigate specific issues, it is not clear if there's a systematic approach to tackle all human rights risks and impacts considered to be salient in its own operations. [Commitment to Respect the Rights of Marginalized Groups reference guide, N/A: hpe.com]<br>• Met: Description of how global system applies to supply chain: The Company indicates that it addresses risks 'We address risks to workers and the environment in the following ways: 1) Remediation. Using information from audits and assessments, we improve SER performance through: HPE-approved corrective |

| Indicator Code | Indicator name | Score (out of 2) | Explanation |
|---|---|---|---|
| | | | action plans that assess root cause of any non-conformance, identify clear improvements assigned to individuals with deadlines, and implement actions to remedy where applicable. Escalated remediation, monitoring, and reporting for critical findings. 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. We believe suppliers must commit to continuous improvement with respect to capability building, and worker voice is critical to compliance and robust operations. 3) Business integration. Our program relies on procurement operations to motivate and incentivize suppliers, including through regular supplier business reviews, sharing the results of HPE's supplier SER scorecard, 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, contributing research, co-developing supplier guidance and tools, or proposing and 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, 2022: hpe.com]<br>• Met: Example of actions decided on at least 1 salient HR issues: The Company reports in its MSA 2020: 'HPE engaged closely with suppliers in our reimbursement program, speaking with them regularly to strengthen their understanding of recruitment fees, improve upon reimbursement plans, and promote worker voice throughout the process. We also regularly reviewed reports for evidence of progress.' In addition, in its MSA 2019: '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 2020, 2021: hpe.com] & [MSA 2019, 01/04/2020: h20195.www2.hpe.com]<br>Score 2<br>• Not Met: Meets all requirements under score 1<br>• Not Met: Involve stakeholders in decisions about actions |
| B.2.4 | Tracking the effectiveness of actions to respond to human rights risks and impacts | 0 | The individual elements of the assessment are met or not as follows:<br>Score 1<br>• Not Met: System for tracking or monitor if actions taken are effective: The Supply Chain Responsibility – Our Approach indicates: 'We engage more closely with suppliers who have critical findings. We escalate findings internally, meet with the supplier to discuss the issues and our expectations, and support the supplier in developing or reviewing their improvements and remediation. This engagement includes regular check-ins, monitoring of improvements with evidence, and worker feedback´. In the context of ranking non-conformances: 'We have a critical incident response process for social and environmental issues found in our supply chain. Critical findings and the underlying management system deficiencies are immediately escalated and the supplier receives a significant penalty in our SER scorecard. We require suppliers to work with us to remediate these issues, demonstrate improvement, and close the issue through a third-party audit. Failure to do so can impact their future business opportunities with HPE. Suppliers must also have a process to communicate the requirements and monitor compliance in their own supply chain based on our Supplier Code of Conduct´. However, it seems to be in the context of compliance monitoring, following audits. The Company is expected to describe its global system for tracking or monitoring the actions taken in response to human rights risks and impacts found in its Human Rights risk assessment. [Supply chain responsibility – Our approach, 2022: hpe.com]<br>• Not Met: Lessons learnt from checking system effectiveness: According to its 2019 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 |

| Indicator Code | Indicator name | Score (out of 2) | Explanation |
|---|---|---|---|
| | | | 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'. However, this document or its content has not been found in publicly available sources anymore. No further information found in latest review. [MSA 2019, 01/04/2020: h20195.www2.hpe.com]<br>Score 2<br>• Not Met: Meets both requirements under score 1<br>• Not Met: Involve stakeholders in evaluation of actions taken |
| B.2.5 | Communicating on human rights impacts | 0 | The individual elements of the assessment are met or not as follows:<br>Score 1<br>• Not Met: Provides two examples of comms with stakeholders: Supply Chain Responsibility – Our Approach indicates: 'Our HRIA is meant to identify/confirm and prioritize our salient human rights risks […] when an affected stakeholder, representative, worker-led monitoring group, or NGO raises a concern related to an alleged breach of our standards'. However, although the Company indicates it communicates with affected stakeholders through the HRIA, this is not a specific example, of communication taking place. The 2021 Modern Slavery Statement indicates: 'This year we worked with a final assembly supplier, the union, a third-party expert, and an NGO to address concerns raised by workers through an NGO. Our immediate response was to commission a third party to speak with a large sample of workers and union representatives to understand their priorities and concerns, and to carry out an assessment of related management systems and practices. […] The workers, union representatives, and other stakeholders helped us understand what matters most to them (increased voice, flexibility, alternative shift patterns, and equal opportunity in promotions)'. However, although there is an example that demonstrates how it communicates with affected stakeholders regarding specific human rights impacts raised by them or on their behalf, the Company is expected to provide two of such examples. The Company has provided additional comments to CHRB regarding this indicator. However, evidence was not material. [Supply chain responsibility – Our approach, 2022: hpe.com] & [2021 Modern Slavery Transparency Statement, 04/2022: hpe.com]<br>Score 2<br>• Not Met: Describe challenges to effective comms and how it is working to address them |

## C. Remedies and Grievance Mechanisms (20% of Total)

| Indicator Code | Indicator name | Score (out of 2) | Explanation |
|---|---|---|---|
| C.1 | Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers | 2 | The individual elements of the assessment are met or not as follows:<br>Score 1<br>• 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.' The Company has provided an additional source to this indicator, however key information was already in use. [Report Ethic Concern, N/A: hpe.com]<br>Score 2<br>• Met: Channel is available in all appropriate languages and workers aware: The Company indicates: 'Anonymous reporting possible wherever local law allows. Translation services available. Operators available 24/7 ' 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. In addition, in its Living Progress Report 2020, the Company indicates: 'All employees must complete the annual SBC refresher course, which covers key policies, procedures, and high-risk issues. Board members take SBC training every two years. New hires complete an SBC course within 30 days of joining HPE'. A reference to the grievance mechanism is included in the Code. [Report Ethic Concern, N/A: hpe.com] & [Ethics Point FAQ, N/A: secure.ethicspoint.com] |

| Indicator Code | Indicator name | Score (out of 2) | Explanation |
|---|---|---|---|
| | | | • Met: Describe how workers in the supply chain have access to grievance mechanism: In its Supplier Code, the Company indicates: 'Suppliers should have a communicated process for their personnel and workers to be able to raise any concerns without fear of retaliation.' It also requires that 'At a minimum, Suppliers shall require their next tier Suppliers to acknowledge and implement the HPE Code and hand the HPE Code down to their sub-tier Suppliers'. In addition, the Company has a Supply Chain Foreign Migrant Worker Policy, which indicates: 'Suppliers shall have effective, confidential grievance mechanisms, available in the migrant workers' native languages, and shall ensure that workers can raise grievances without intimidation or fear of retaliation. Such mechanisms should also include the ability to report grievances anonymously if desired, unless restricted by local law.' [Supplier Code of Conduct, 2022: hpe.com] & [Migrant worker standards, 2021: hpe.com]<br>• Met: Expect Suppliers to convey expectation to their own suppliers: The supplier code requires that 'At a minimum, Suppliers shall require their next tier Suppliers to acknowledge and implement the HPE Code and hand the HPE Code down to their sub-tier Suppliers'. [Supplier Code of Conduct, 2022: hpe.com] & [Migrant worker standards, 2021: hpe.com] |
| C.2 | Grievance channel(s)/mechanism(s) to receive complaints or concerns from external individuals and communities | 1 | The individual elements of the assessment are met or not as follows:<br>Score 1<br>• 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: hpe.com] & [Living the progress Report 2019, 05/2020: assets.ext.hpe.com]<br>Score 2<br>• Not Met: Describes accessibility and local languages and stakeholder awareness: In addition, it indicates: 'Anonymous reporting possible wherever local law allows. Translation services available. Operators available 24/7'. 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. Similarly, the Global Human Rights Policy states: ´We ensure easy access for any individual to raise a concern through our third-party managed hotline, available 24 hours a day, 7 days a week in any language, with an option to raise an issue anonymously. […] We also benefit from additional third-party channels including those managed by RBA and RMI´. However, although the Company indicates that it has the channel available in all appropriate languages, no information describing how the Company ensures awareness in external stakeholders was found. [Report Ethic Concern, N/A: hpe.com] & [Ethics Point FAQ, N/A: secure.ethicspoint.com]<br>• Not Met: Communities access mechanism direct or through suppliers: Although the Company indicates in its Living Progress Report that 3rd party audits are carried out using the RBA Validated Audit Process, and that the RBA Code include requirements related to accessible grievance channels for workers and local communities, it is not clear how many of its suppliers are audited according to RBA Code. No further information found in latest review. [2020 Living Progress Report, 2021: hpe.com] & [Data Summary 2019, 05/2020: h20195.www2.hpe.com]<br>• Not Met: Expect supplier to convey expectation to their own suppliers |
| C.3 | Users are involved in the design and performance of the channel(s)/mechanism(s) | 0 | The individual elements of the assessment are met or not as follows:<br>Score 1<br>• Not Met: Engages users to create or assess system<br>• Not Met: Examples (at least two) of how they do this<br>Score 2<br>• Not Met: Engages with potential or actual users on the improvement of the mechanism<br>• Not Met: Provides user engagement example (at least two) on improvement |
| C.4 | Procedures related to the mechanism(s)/channel(s) are equitable, | 0 | The individual elements of the assessment are met or not as follows:<br>Score 1<br>• Not Met: Response timescales and how complainants will be informed<br>• Not Met: Describe support (technical, financial,etc) available for equal access by complainants |

| Indicator Code | Indicator name | Score (out of 2) | Explanation |
|---|---|---|---|
| | publicly available and explained | | Score 2<br>• Not Met: Describe types of outcome to complainant through use of mechanism<br>• Not Met: Escalation to senior/independent level |
| C.5 | Prohibition of retaliation for raising complaints or concerns | 0.5 | The individual elements of the assessment are met or not as follows:<br>Score 1<br>• Met: Public statement prohibiting retaliation: The Company states in its Global Human Rights Policy: 'We ensure easy access for any individual to raise a concern through our third-party managed hotline, available 24 hours a day, 7 days a week in any language, with an option to raise an issue anonymously. HPE prohibits the use of retaliation of any form´. The Company has provided comments to CHRB regarding this indicator. However, the content of it was already in use. [Human Rights Policy, 2022: hpe.com]<br>• Not Met: Practical measures to prevent retaliation: As indicated above, the Company's grievance mechanism allows anonymous reports. However, as indicated in its Standards of Business Conduct: 'Anonymous reporting possible wherever local law allows'. It is not clear, whether there are alternatives on practical measures to prevent retaliation in cases where anonymous reports are not allowed. [Report Ethic Concern, N/A: hpe.com] & [Standards of Business Conduct - website, N/A: sbc.hpe.com]<br>Score 2<br>• Not Met: Company indicate it will not retaliate against workers/stakeholders<br>• Not Met: Expects suppliers to prohibit retaliation against workers/stakeholders: The Company indicates in its Supplier Code of Conduct: 'Suppliers should have a communicated process for their personnel and workers to be able to raise any concerns without fear of retaliation.' Similarly, the Migrant Worker Standard notes: ´No retaliation shall be taken against any worker, including migrant workers who report grievances´. However, no reference concerning suppliers' external stakeholders found. [Supplier Code of Conduct, 2022: hpe.com] & [Migrant worker standards, 2021: hpe.com] |
| C.6 | Company involvement with state-based judicial and non-judicial grievance mechanisms | 0 | The individual elements of the assessment are met or not as follows:<br>Score 1<br>• Not Met: Complainants not asked to waive rights<br>• Not Met: Company does not require confidentiality provisions<br>Score 2<br>• Not Met: Will work with state based non judicial mechanisms: The Global Human Rights Policy indicates: ´HPE prohibits the use of retaliation of any form, and as appropriate cooperate—and not obstruct—remedy through judicial and non-judicial mechanisms´. However, it is not clear it sets out the process by which it cooperates with state-based non-judicial grievance mechanism on complaints brought against it. [Human Rights Policy, 2022: hpe.com]<br>• Not Met: Example of issue resolved (if applicable) |
| C.7 | Remedying adverse impacts | 2 | The individual elements of the assessment are met or not as follows:<br>Score 1<br>• Met: Describes how remedy has been provided: The Company reports in its MSA 2020: 'We identified one critical finding related to risks of forced labor in our supply chain in FY20, which was a case of workers paying recruitment fees to recruitment agencies in their home countries. HPE worked intensively with the supplier, as we do in each instance of a critical finding, to ensure all workers were fully reimbursed within three months of the critical finding, and the supplier improved its policies, agreements, and systems for identifying and preventing such recruitment fees. HPE also worked with the supplier to improve worker awareness of the policy against recruitment fees and worker trust in the effectiveness of available grievance channels.' [MSA 2020, 2021: hpe.com]<br>Score 2<br>• Met: Changes to systems, processes and practices to stop similar impact: The Company reports in its MSA 2020: 'HPE engaged closely with suppliers in our reimbursement program, speaking with them regularly to strengthen their understanding of recruitment fees, improve upon reimbursement plans, and promote worker voice throughout the process. We also regularly reviewed reports for evidence of progress.' In addition, in its MSA 2019: '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 |

| Indicator Code | Indicator name | Score (out of 2) | Explanation |
|---|---|---|---|
| | | | 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 2020, 2021: hpe.com] & [MSA 2020, 2021: hpe.com]<br>• Met: Describe approach to monitoring implementation of agreed remedy: The 2021 Modern Slavery Statement indicates: 'This year we worked with a final assembly supplier, the union, a third-party expert, and an NGO to address concerns raised by workers through an NGO. Our immediate response was to commission a third party to speak with a large sample of workers and union representatives to understand their priorities and concerns, and to carry out an assessment of related management systems and practices. The supplier engaged in a six-month program of improvement, training, worker engagement, and heightened monitoring with HPE - focusing primarily on worker priorities of effective grievance mechanisms, increased and more effective engagement with the union, and non-discrimination. […] A final independent audit confirmed the supplier effectively addressed all nonconformances´. [2021 Modern Slavery Transparency Statement, 04/2022: hpe.com]<br>• Not Met: Approach to learning from incident to prevent future impacts |
| C.8 | Communication on the effectiveness of grievance mechanism(s) and incorporating lessons learned | 0.5 | The individual elements of the assessment are met or not as follows:<br>Score 1<br>• Not Met: Number grievances filed, addressed or resolved and outcome achieved: The 2021 Data Summary indicates: 'HPE responded to 100% of our queries related to human rights. We receive queries through a variety of grievance channels including our human resources lines, open door policy, ethics and compliance inbox, investor relations inbox, RBA grievance mechanism, our third-party hotline, Sustainability Contact Center, and direct to our human rights team. These queries are in addition to general queries regarding our social and environmental responsibility and responsible mineral sourcing in the supply chain'. It also discloses figures for these Human Rights inquiries in 2021 and are divided by the party who raised it, including employee (8) and NGO (1). In total. There were 80 Human Rights inquiries in 2021. However, no further information found including outcomes achieved for the different stakeholder groups that raised them. [2021 Data Summary, 2022: assets.ext.hpe.com]<br>• Met: How lessons from mechanism improve management system: The 2021 Modern Slavery Statement indicates: 'This year we worked with a final assembly supplier, the union, a third-party expert, and an NGO to address concerns raised by workers through an NGO. […] The workers, union representatives, and other stakeholders helped us understand what matters most to them (increased voice, flexibility, alternative shift patterns, and equal opportunity in promotions). […] Worker feedback has spurred our work with peers to develop worker human rights training (which we plan to roll-out along our supply chain), and helped us shape our supply chain gender plans, as published in our 2022 Commitment to Respect the Rights of Marginalized Groups (covering migrants, women, children and youth, racial and ethnic minorities, and human rights defenders). This effort also helped our understanding of best practice in engaging union representatives in supplier improvement planning´. [2021 Modern Slavery Transparency Statement, 04/2022: hpe.com]<br>Score 2<br>• Not Met: Evaluation of the channel/mechanism and changes made as result<br>• Not Met: Describes procedures to address delays of outcomes agreed with stakeholders |

## D. Performance: Company Human Rights Practices (25% of Total)

| Indicator Code | Indicator name | Score (out of 2) | Explanation |
|---|---|---|---|
| D.4.1.b | Living wage (in the supply chain) | 0 | The individual elements of the assessment are met or not as follows:<br>Score 1<br>• Not Met: Discloses living wage requirements in supplier code or contracts: The Company indicates in its Supplier Code: 'Compensation paid to workers shall comply with all applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits.' No evidence found on living wage. [Supplier Code of Conduct, 2022: hpe.com]<br>• Not Met: Improving living wage practices of suppliers<br>Score 2<br>• Not Met: Assessment of number affected by payment below living wage<br>• Not Met: Provides analysis of trends demonstrating progress |

| Indicator Code | Indicator name | Score (out of 2) | Explanation |
|---|---|---|---|
| D.4.2 | Aligning purchasing decisions with human rights | 0 | The individual elements of the assessment are met or not as follows:<br>Score 1<br>• Not Met: Avoids business model pressure on HRs (purchasing practices): The Company indicates: 'we regularly train HPE buyers (e.g., managers in strategic sourcing) on key SER [Global Social and Environmental Responsibility] risks, including modern slavery and working hours, our approach to supply chain responsibility, and how such buyers' purchasing practices can exacerbate or reduce risk of forced labor in our supply chain. We work closely with buying teams, and with each critical finding, we facilitate 1:1 discussions with relevant internal sourcing managers to review and share best practice on our sourcing practices and aim to leverage our practices to positively impact supplier SER performance'. Additionally, 'any supplier with a critical finding receives a significant penalty in their SER Scorecard, which can impact the supplier's future business awards with HPE. HPE supplier performance managers operating within our purchasing teams communicate to suppliers the importance of adherence to HPE SER standards and polices as reflected in our scorecards, and work closely to monitor progress of identified corrective actions'. Also, 'Our SER team partners day-to-day with our buying teams across the company on SER topics, concerns, and messaging; and regularly train our buying teams on our commitments, supplier requirements, responsible purchasing practices, and workers' feedback and risks related to topics such as forced labor and working hours'. However, although the Company indicates it trains and supports key workers to improve their sourcing practices and it keeps the scores of its suppliers in relation to its compliances, it is not clear the practices it adopts specifically to avoid price or short notice requirements or other business considerations undermining human rights. This indicator looks the opposite perspective, how the Company's actions can have negative impacts on suppliers. [2021 Modern Slavery Transparency Statement, 04/2022: hpe.com]<br>• Not Met: Practices adopted to pay suppliers in line with agreed timeframes<br>• Not Met: Review own operations to mitigate negative impact<br>Score 2<br>• Not Met: Meets all requirements under score 1<br>• Not Met: Examples of how it assessed, addressed and change purchasing practices |
| D.4.3 | Mapping and disclosing the supply chain | 1.5 | The individual elements of the assessment are met or not as follows:<br>Score 1<br>• Met: Identifies direct and indirect suppliers back to manufacturing sites (factories or fields): The Company discloses in its 'Suppliers Reference Guide' document a list of 'Hewlett Packard Enterprise production suppliers and information about their sustainability practices. These suppliers represent more than 95% of HPE's procurement expenditures for materials, manufacturing, and assembly at the time of publication. This list includes final assembly suppliers, which may include contract manufacturers, electronic manufacturing service providers, and original design manufacturers, as well as commodity and component suppliers'. The Company indicates that commodity and components suppliers are indirect suppliers. [Suppliers reference guide, 06/2021: assets.ext.hpe.com]<br>Score 2<br>• Met: Discloses names and locations of significant parts of SP and why: The Company discloses its Supplier List which 'represent more than 95% of HPE's procurement expenditures for materials, manufacturing, and assembly at the time of publication. This list includes final assembly suppliers, which may include contract manufacturers, electronic manufacturing service providers, and original design manufacturers, as well as commodity and component suppliers. [Supplier List, 06/2021: assets.ext.hpe.com] |

| Indicator Code | Indicator name | Score (out of 2) | Explanation |
|---|---|---|---|
| | | | • Not Met: Discloses which direct or indirect suppliers is involved in higher-risk activities: The 2021 Modern Slavery Statement indicates: 'Through research, on-site due diligence, and engagement with supplier facilities and industry groups, HPE has identified the following salient risks in its supply chain: the risk of forced labor with students and dispatch labor in China, foreign students in Japan, and migrant workers in certain high-risk countries in Asia. Forced labor risks can increase when facilities are dependent on recruitment agents or temporary workers – as such we review supplier practices for managing agents and contractors, and require suppliers to limit dependence on them. We noted that risks are not associated with types of products, but are often associated with sub- tier operations – e.g., higher risk further down our supply chain. […] Factors that may indicate higher risk in our indirect supply chain include low skilled labor, dependency on temporary or foreign workers, and specific types of services such as facility management, security and construction. […] Our Supply Chain Responsibility (SCR) program reflects years of research and engagement and incorporates our ongoing risk assessments. Those risk assessments have indicated, and continue to indicate, that the risks of forced labor, bonded labor, and human trafficking are highest in our supply chain, specifically at the sites where our products are manufactured. Our key risks at supplier sites include payment of recruitment fees charged by third-party recruitment agents, and lack of strong supplier management systems that would detect and prevent such fees´. However, although the Company discloses the various risks identified, including geography, activities, among other characteristics, it is no clear which direct or indirect suppliers it considers to be involved in higher-risk. The Company is expected to indicate which are they suppliers it considers to be riskier. [2021 Modern Slavery Transparency Statement, 04/2022: hpe.com] |
| D.4.4.b | Prohibition of child labour: Age verification and corrective actions (in the supply chain) | 0.5 | The individual elements of the assessment are met or not as follows:<br>Score 1<br>• Met: Child Labour rules in codes or contracts: The Supplier Code includes a section dedicated to the prohibition to Child Labour and the management of Young workers: 'Child labor is not to be used in any stage of manufacturing or in the provision of services or supplies, nor should children be permitted in manufacturing areas. [...] Suppliers shall implement an appropriate mechanism to verify the age of workers. [...] If child labor is identified, assistance/remediation is provided, including immediate support to transport the child safely to their parent or guardian, support for continuing education, and financial support'. [Supplier Code of Conduct, 2022: hpe.com]<br>• Not Met: How working with suppliers on child labour: The 2021 Living Progress indicates: 'we contributed enhancements to the multi-industry Responsible Business Alliance Code of Conduct, better aligning it with the well-respected ILO Core Conventions and incorporating new, tough rules to deter the use of child labor and ensure any identified cases of child labor are fully remediated'. However, although it indicates that has contributed to the RBA Code, it is not clear how it works with suppliers to eliminate child labour and to improve working conditions for young workers where relevant. [2021 Modern Slavery Transparency Statement, 04/2022: hpe.com]<br>Score 2<br>• Not Met: Assessement of number affected by child labour in supply chain<br>• Not Met: Analysis of trends in progress made: The 2022 Data Summary indicates that in the year 2021, the number of 'Critical findings related to the ILO Declaration on Fundamental Principles and Rights at Work: freedom of association; freedom from forced, bonded, or indentured labor; from child labor; or from discrimination' was 3. However, there is no detailed information related only to child labor. Moreover, the Company is expected to provide as analysis of trends, or year-on-year figures. [2021 Data Summary, 2022: assets.ext.hpe.com] |

| Indicator Code | Indicator name | Score (out of 2) | Explanation |
|---|---|---|---|
| D.4.5.b | Prohibition of forced labour: Recruitment fees and costs (in the supply chain) | 1.5 | The individual elements of the assessment are met or not as follows:<br>Score 1<br>• Met: Debt and fees rules in codes or contracts: In its Supplier Code, the Company indicates: 'Forced, bonded (including debt bondage) or indentured labor; prison labor; or slavery or trafficking of persons is not permitted. […] Workers shall not be required to pay suppliers', employers', agents', or sub-agents' recruitment fees or other related fees for their employment. Suppliers shall maintain adequate controls to ensure that workers have not been charged recruitment or placement fees during their recruitment process and Suppliers are responsible to repay any such fees charged to workers.' In addition, the Company put in place the Supply Chain Foreign Migrant Worker Standard which sets put 'minimum requirements for the appropriate and ethical recruitment and management of foreign migrant workers by or on behalf of suppliers doing business with Hewlett Packard Enterprise'. [Supplier Code of Conduct, 2022: hpe.com] & [Migrant worker standards, 2021: hpe.com]<br>• Met: How working with suppliers on debt & fees: In its Modern Slavery Statement 2020, 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'. In 2020 'HPE engaged closely with supplier in our reimbursement program, speaking with them regularly to strengthen their understanding of recruitment fees, improve upon reimbursement plans, and promote worker voice throughout the process'. The Company has provided an additional source to this indicator, however key information was already in use. [MSA 2020, 2021: hpe.com]<br>Score 2<br>• Met: Assessment of the number affected by payment of recruitment fees: The 2022 Data Summary discloses a table with forced labor risk indicators, including: Foreign migrant workers in our supply chain: 3,803; Top 3 nationalities of foreign migrant workers: Philippines, Nepalese, Malaysian; Facilities that provide worker accommodation: 50% of workers reimbursed for recruitment fees identified: 100%; Cumulative total of reimbursement fees reimbursed to workers (since 2020): $1,092,553; Major suppliers that demonstrate their commitment to the Employer Pays Principle in a written policy or commitment: 88%. It also indicates: ´Within the labor category, […] 0 workers were impacted by a priority or critical non-conformance related to fees´. Also; ´Nonconformances related to freely chosen employment primarily consisted of lack of adequate and effective policies and procedures to ensure that any form of forced, bonded, involuntary, or exploitative prison, trafficked, or slave labor is not used. One common finding is workers initially covering the cost of a small medical examination at the onboarding stage, and being reimbursed later. Suppliers were required to complete corrective actions for identified issues. We continued to undertake stringent due diligence within our supply chain to uncover risks—including through heightened due diligence against our Migrant Worker Standard'. [2021 Data Summary, 2022: assets.ext.hpe.com]<br>• Not Met: Analysis of trends in progress made: The Company discloses information about the number of 'critical finding related to the ILO Declaration on Fundamental Principles and Rights at Work: freedom of association; freedom from forced, bonded, or indentured labor; from child labor; or from discrimination' for 2020 (1). However, it is not clear which is the specific trend for this particular issue. It also reports on major nonconformances of sites audited for the last year which include 'Freely chosen employment management systems', which cover debt bondage and freedom of movement: '[...] we identified one critical finding payment of excessive recruitment fees'. However, it is not clear the trend (figures need to be compared in the same report to establish a trend). [Data Summary 2020, 2021: hpe.com] |
| D.4.5.d | Prohibition of forced labour: Wage practices (in the supply chain) | 0.5 | The individual elements of the assessment are met or not as follows:<br>Score 1<br>• Met: Requirement for suppliers to pay workers in full and on time in codes or contracts: The Company requires in its Supplier Code: 'For each pay period, workers shall be paid on time, in currency that is local or accessible by workers, provided with a timely and understandable wage statement that includes sufficient information to verify accurate compensation for work performed' [Supplier Code of Conduct, 2022: hpe.com] |

| Indicator Code | Indicator name | Score (out of 2) | Explanation |
|---|---|---|---|
| | | | • Not Met: How working with supply chain to pay workers regularly and on time: The 2022 Data Summary indicates : ´Wage-related nonconformances largely occurred primarily in Asia. The most common issue concerned social security deductions or withholdings not being calculated correctly and submitted to the appropriate government agency within the local law time frame. We continue to work with suppliers and peers to better understand the root cause of these issues and a process to fix them and sustain compliance´. However, although the Company indicates it works with suppliers to address issues related to wage practices, no description of the work carried out found. [2021 Data Summary, 2022: assets.ext.hpe.com]<br>Score 2<br>• Met: Assessment of the number affected by failure to pay directly: The 2022 Data Summary indicates ´504 workers were impacted by incorrect calculation and provision of wages (across two sites). […] 0 workers were impacted by findings related to penalties or deductions for disciplinary reasons. Approximately 360 workers were impacted by findings related to timely pay or provision of clear wage records (the vast majority being approximately one week delay in full payment to resigned workers)´. [2021 Data Summary, 2022: assets.ext.hpe.com]<br>• Not Met: Provides analysis of trends demonstrating progress |
| D.4.5.f | Prohibition of forced labour: Restrictions on workers (in the supply chain) | 0.5 | The individual elements of the assessment are met or not as follows:<br>Score 1<br>• Met: Free movement rules in codes or contracts: In its Supplier Code, the Company indicates: 'There shall be no unreasonable restrictions on workers' freedom of movement in the facility, nor unreasonable restrictions on entering or exiting company- provided facilities, including, if applicable, workers' dormitories or living quarters. Workers shall have the right to choose their own accommodation. […]. Workers shall be free to leave work at any time without penalty, to terminate their employment with reasonable notice, and receive pay for all work carried out, in accordance with the terms in a worker's contract. Suppliers, agents, and sub-agents may not hold or otherwise destroy, conceal, or confiscate identity or immigration documents, such as government-issued identification, passports, or work permits, or other personal assets. Employers can only hold documentation if such holdings are required by law. In this case, at no time should workers be denied access to their assets. Suppliers will ensure any instances of workers being denied assets are addressed, immediately returning documents to workers and providing for worker safekeeping.' [Supplier Code of Conduct, 2022: hpe.com]<br>• Not Met: How working with suppliers on free movement: In its 'Living Progress Data Summary 2017' document, the Company indicates: 'we identified four critical findings, including: payment of excessive recruitment fees; restriction of workers access to personal documentation; […]. In each case we worked closely with the relevant supplier to remediate the issue and strengthen management system to guard against reoccurrence. […] Specific remedial actions have included suppliers […] returning personal documents, deposits and savings; changing company policies and procedures; updating workers contracts, amending labor agent contracts, enhancing labor agent due diligence and monitoring; and clearly communicating changes to policies and practices to workers.' However, this document, dated 2018, is now out of the three-year timeframe that the methodology requires. No further evidence found in latest review. [Living Progress Data Summary 2017: h20195.www2.hpe.com]<br>Score 2<br>• Met: Assessment of the number affected by retaining docs or restricting movement: The 2022 Data Summary indicates that ´Within the labor category, up to 430 workers were impacted by document retention—all workers were from one supplier, who immediately returned personal assets and provided lockers for workers' safekeeping´. [2021 Data Summary, 2022: assets.ext.hpe.com]<br>• Not Met: Provides analysis of trends demonstrating progress: In its Living Progress Data Summary 2020, the Company discloses information about the number of 'critical finding related to the ILO Declaration on Fundamental Principles and Rights at Work: freedom of association; freedom from forced, bonded, or indentured labor; from child labor; or from discrimination' for 2020 (1). However, it is not clear which is the specific trend for this particular issue. [Data Summary 2020, 2021: hpe.com] |

| Indicator Code | Indicator name | Score (out of 2) | Explanation |
|---|---|---|---|
| D.4.6.b | Freedom of association and collective bargaining (in the supply chain) | 0.5 | The individual elements of the assessment are met or not as follows:<br>Score 1<br>• Met: FoA & CB rules in codes or contracts: In its Supplier Code, the Company indicates: '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. In situations where right to freedom of association and collective bargaining is restricted by local regulation, suppliers shall allow and actively engage with alternate forms of worker representation. 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'. [Supplier Code of Conduct, 2022: hpe.com]<br>• Not Met: How working with suppliers on FoA and CB<br>Score 2<br>• Met: Assessment of the number affected by restrictions to FoA and CB in the SP: In our Living Progress Report for 2021, we publish 0 findings on freedom of association, hence no workers were affected. [2021 Data Summary, 2022: assets.ext.hpe.com]<br>• Not Met: Provides analysis of trends demonstrating progress: In its Living Progress Data Summary, the Company discloses information about the number of 'critical finding related to the ILO Declaration on Fundamental Principles and Rights at Work: freedom of association; freedom from forced, bonded, or indentured labor; from child labor; or from discrimination' for 2020 (1). However, there is no detailed information related only to freedom of association and collective bargaining. [Data Summary 2020, 2021: hpe.com] |
| D.4.7.b | Health and safety: Fatalities, lost days, injury, occupational disease rates (in the supply chain) | 0.5 | The individual elements of the assessment are met or not as follows:<br>Score 1<br>• Met: Sets out clear Health and Safety requirements: The Company's Supplier Code includes 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, 2022: hpe.com]<br>• Not Met: Injury rate disclosures and lost days (or near miss disclosures) for the last reporting period: The Company indicates in its Living Progress Report 2020: In 2020, our lost workday case rate was .02 and our recordable incident rate was .05.' However, these figures do not seem to include suppliers' workers. [2020 Living Progress Report, 2021: hpe.com]<br>• Not Met: Fatalities disclosures for lasting reporting period<br>• Not Met: Occupational disease rates for the last reporting period<br>Score 2<br>• Not Met: How working with suppliers on H&S<br>• Not Met: Assessment of the number affected by H&S issues in the SP<br>• Not Met: Provide analysis of trends in progress made: The Company reports in its Living progress data summary 2020 on the number of non-conformances related to Health and Safety in supplier SER audits: 'Health and safety findings represented 36% of all major nonconformances in 2020. […] Nonconformances related to emergency preparedness were specific to emergency exit routs that were inadequate in number and location, not readily accessible, or not properly maintained. [...] Nonconformances with respect to occupational safety are related to workplace health and safety risks to workers, not properly identified, assessed or mitigated. Nonconformances were found related to the requirement of having reasonable steps to remove pregnant women/nursing mothers from working conditions with high hazards. This area was harnessed by the RBA in 2018, and some suppliers were first assessed against this requirement in 2020. [...]' However, no trend analysis was found. [Data Summary 2020, 2021: hpe.com] |

| Indicator Code | Indicator name | Score (out of 2) | Explanation |
|---|---|---|---|
| D.4.8.b | Women's rights (in the supply chain) | 0 | The individual elements of the assessment are met or not as follows:<br>Score 1<br>• Not Met: Women's rights in codes or contracts: The Supplier Code of Conduct indicates: ´HPE respects human rights as defined by the United Nations Universal Declaration of Human Rights (UDHR). In particular, we respect the rights of vulnerable groups (including migrants, children, and women) and all individuals in accordance with the core ILO conventions and the Convention on the Rights of the Child. HPE expects our suppliers to also uphold these standards´. The Migrant Worker Standard indicates: ´The treatment of migrant workers shall be equal with that of local workers. This includes the same wage rate for the same job, equal opportunity for bonuses and promotions, regular and overtime hours, shift arrangements, holidays, access to facilities, insurance and any other benefits, except where different benefits are specified under local law. Registration of migrant workers' applicable social security, work accident insurance and other benefits shall be made timely´. The scope of the document covers suppliers. However, it is not clear the Company requires suppliers to provide equal pay for equal work, introduce measures to ensure equal opportunities throughout all levels of employment and to eliminate health and safety concerns that are particularly prevalent among women workers in its contractual arrangements with suppliers or supplier code of conduct. [Supplier Code of Conduct, 2022: hpe.com] & [Migrant worker standards, 2021: hpe.com]<br>• Not Met: How working with suppliers on women's rights<br>Score 2<br>• Not Met: Assessment on the number affected by discrimination or unsafe working conditions<br>• Not Met: Provide analysis of trends in progress made |
| D.4.9.b | Working hours (in the supply chain) | 0.5 | The individual elements of the assessment are met or not as follows:<br>Score 1<br>• Met: Working hours in codes or contracts: In its Supplier Code, the Company indicates: 'workweek should not be more than 60 hours per week, including overtime, except in emergency or unusual situations. Suppliers should not schedule workers for more than 48 hours in a regular workweek. All overtime must be voluntary. Workers shall be provided sufficient rest including breaks, rest between shifts, holiday, and allowed at least one day off every seven days.' [Supplier Code of Conduct, 2022: hpe.com]<br>• Not Met: How working with suppliers on working hours: The Company indicates in its Living Progress Data Summary 2020 with respect Working hours audit non-conformances: 'We are continue to work with suppliers to raise standards by: [...] Engaging with supplier management to address root causes of non conformances and support them in establishing robust working hours monitoring systems'. No details found on proactive work to improve performance. Evidence seems to focus in correcting non-compliances. The 2021 Modern Slavery Statement indicates: ´We require our key suppliers in high-risk locations or suppliers that have had certain non-conformances to provide additional monthly reporting on key performance indicators such as working hours and number of vulnerable workers´. Additionally, ´Our live, facilitated trainings on human rights, conflict minerals, forced labor, hours, and health and safety reached a total of 313 participants, and approximately 62% of our suppliers in our program (which covers tier 1 and 2 suppliers who account for 98% of our supply chain spend)´. However, no description found of the training to improve working hours practices. [Data Summary 2020, 2021: hpe.com] & [2021 Modern Slavery Transparency Statement, 04/2022: hpe.com]<br>Score 2<br>• Not Met: Assessment of number affected by excessive working hours<br>• Met: Provide analysis of trends in progress made: In its 'Living Progress Data Summary 2020' document, the Company indicates: 'The most frequent nonconformance was associated with HPE's requirement for a maximum 60-hour workweek. Other findings related to our requirement for workers to have one day off in seven. In 2020, an average of 95% of workers at supplier sites in the KPI program worked less than 60 hours per week, compared to 96% in 2019. On average, 98% of workers at supplier sites received at least one day of rest in every seven-day period, compared to 99% in 2019. The slight decrease of these percentages is also a result of the pandemic. We are continue to work with suppliers to raise standards by: Frequent monitoring of conformance with working hours and day of rest requirements for certain suppliers through our KPI program; Engaging with supplier management to address root causes of non-conformances and support them in establishing robust working hours monitoring systems.' [Data Summary 2020, 2021: hpe.com] |

| Indicator Code | Indicator name | Score (out of 2) | Explanation |
|---|---|---|---|
| D.4.10.a | Responsible mineral sourcing: Arrangements with suppliers and smelters/refiners in the mineral resource supply chains | 0.5 | The individual elements of the assessment are met or not as follows:<br>Score 1<br>• Met: Due diligence in accordance with OECD Guidance in supplier contracts: The supplier code states: 'Suppliers shall adopt a policy and exercise due diligence on the source and chain of custody of the tantalum, tin, tungsten, and gold ("3TG") in the products, parts, components, and materials they manufacture to reasonably assure that they are sourced in a way consistent with the Organisation for Economic Co-operation and Development (OECD) Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas ("OECD Guidance") or an equivalent and recognized due diligence framework. Suppliers are also required to inform HPE immediately if they identify certain high risks included in Annex II of the OECD Guidance (including, but not limited to conflict or human rights risks associated with 3TG).' A similar requirement is included in its Supply Chain Social and Environmental Responsibility Policy': Suppliers must ensure that parts and products supplied to HPE contain minerals that are responsibly sourced. Suppliers are required to establish and maintain policies, due diligence frameworks, and management systems consistent with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas. Suppliers must exercise due diligence on tin, tantalum, tungsten, and gold necessary to the functionality or production of materials, parts, components, or products supplied to HPE. Suppliers must extend these expectations to their suppliers'. In its Supplier Code, the Company indicates: 'The HPE Code is a total supply chain requirement. At a minimum, Suppliers shall require their next tier Suppliers to acknowledge and implement the HPE Code and flow down the requirements of the HPE Code down to their sub-tier Suppliers. The requirements of the HPE Code apply to all workers including temporary, migrant, student, contract, direct employees, and any other type of worker.' [Supplier Code of Conduct, 2022: hpe.com] & [Supply Chain Social and Environmental Responsibility Policy, 2021: hpe.com]<br>• Not Met: Works with smelters/refiners and suppliers to build capacity: The Company indicates in its SCR: Our approach document: 'We also directly engage with smelters and refiners to increase their awareness of due diligence resources and encourage their use'. Additionally, the 2021 Living Progress indicates: ´Through our Responsible Minerals Program, we work to advance the responsible sourcing of minerals used in our products and within our supply chain'. Also, ´Although we do not prohibit our suppliers from sourcing from CAHRAs […], we strive to improve the transparency of mineral sourcing within our supply chain and achieve DRC conflict-free sourcing. We designed our program to align with the internationally recognized OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from CAHRAs. HPE's processes for identifying and prioritizing risks and impacts in its supply chain, including with respect to smelter and refiner due diligence, in alignment with OECD Guidance is set for in HPE Supply Chain Responsibility: Our Approach and our annual HPE Conflict Minerals Disclosure'. However, no description found of how it works with both SORs and suppliers to contribute to building their capacity in risk assessment and improving their due diligence performance (including through industry-wide initiatives). [Supply chain responsibility – Our approach, 2022: hpe.com] & [2021 Living Progress Report, 2022: assets.ext.hpe.com]<br>Score 2<br>• Not Met: Contractual requirement to disclosure smelter/refiner information<br>• Not Met: Contractual requirement covers all minerals |

| Indicator Code | Indicator name | Score (out of 2) | Explanation |
|---|---|---|---|
| D.4.10.b | Responsible mineral sourcing: Risk identification and responses in mineral supply chain | 0.5 | The individual elements of the assessment are met or not as follows:<br>Score 1<br>• Not Met: Risk identification and disclosure in line with OECD Guidance: The 2021 Conflict Minerals Report indicates: ´Identification and assessment of risks in the supply chain, including through the Supply Chain Transparency System, the mechanism by which risks are identified and assessed in the supply chain. The system is designed to support the Responsible Minerals Program team in systematically surveying, collecting, and analyzing information relating to 3TG facilities´. The 2021 Living Progress indicates: ´In 2021, 99% of smelters and refiners reported by suppliers made progress toward DRC conflict-free status´. The 2022 Data Summary notes: 'HPE conducted due diligence by surveying suppliers between January 1, 2021 and December 31, 2021 to identify smelters and refiners in our supply chain […]. The surveyed suppliers contributed material, components, or manufacturing to products containing tin, tantalum, tungsten, or gold (3TG). The percentage of conformant smelters and refiners dropped year-over-year due to the onboarding of 30 new suppliers in 2021. The 2020 Conflict Minerals Report indicates that the 'supply chain transparency system' is the mechanism by which risks are identified and assessed in the supply chain. As described below, it surveyed suppliers and required them to survey their supply chains using the reporting template. It assessed countries of origin and participation in RMAP. However, no reference found to what are the risks it faces. [Conflict Minerals Report 2020, 2021: assets.ext.hpe.com] & [2021 Conflic Mineral Report, 2022: hpe.com]<br>• Met: Identification of smelter/refiners and OECD Guidance: In its Conflict Mineral Report 2020, the Company indicates that it 'surveyed 3TG Direct Suppliers during the reporting period of this Conflict Minerals Report using the Template […] and required those suppliers to make similar efforts to survey their supply chains using the Template; reviewed information obtained through those surveys on 3TG facilities, and any mine or location of origin information if it was provided; and assessed any information on countries of origin available through our membership in RMI for 3TG facilities.' 'Because participation in an audit program, such as RMAP, provides us (a downstream company) with a level of assurance of an upstream facility's sourcing practices, we track and report on this participation'. [Conflict Minerals Report 2020, 2021: assets.ext.hpe.com]<br>Score 2<br>• Met: Discloses smelters/refiners judged in line with OECD Guidance: The Company discloses in its Conflict Minerals Report 2020 the List of all qualified smelters/refiners in it supply chain that it has independently judged, and it indicates: 'Our suppliers reported 302 total 3TG facilities in 2020, 95% (288) of which (as of the 2021 Cut-Off Date) are conformant with or active with an OECD aligned independent assessment program, are believed to source from outside the Covered Countries, or are exclusively providing conflict minerals from recycled or scrap sources. Only 5% (14) of the supplier-reported 3TG facilities are facilities for which we have limited or no information on the sourcing of necessary conflict minerals (both because they are not yet participating in an audit program and because we found no information giving us reason to believe they were sourcing from outside the Covered Countries or exclusively from recycled or scrap sources)'. [Conflict Minerals Report 2020, 2021: assets.ext.hpe.com]<br>• Not Met: Risk identification and disclosure covers all minerals |
| D.4.10.c | Reporting on responsible sourcing of minerals | 0 | The individual elements of the assessment are met or not as follows:<br>Score 1<br>• Not Met: Describes mineral risk management plan for supply chain: The Company includes in its Conflict Minerals Report a list of 'Steps to Further Mitigate Risk and Improve Due Diligence in 2021', however these steps are not related with the management and respond to risks identified in its mineral supply chain. [Conflict Minerals Report 2020, 2021: assets.ext.hpe.com]<br>• Not Met: Monitoring, tracking and whether better risk prevention/mitigation over time<br>• Not Met: Disclose better risk prevention/mitigation over time |

| Indicator Code | Indicator name | Score (out of 2) | Explanation |
|---|---|---|---|
| | | | Score 2<br>• Not Met: Suppliers and stakeholders engaged in risk management strategy: The 2021 Living Progress indicates: ´In 2021, we rolled out a new shared industry tool, the Minerals Grievance Platform, an online system for reporting, tracking, and managing critical incidents linked to mineral supply chains. HPE also joined the Public-Private Alliance for Responsible Minerals Trade (PPA), which supports collaborative 3TG initiatives in the DRC region with peer companies and the U.S. government´. However, although stakeholders have grievance channels to report concerns, it is not clear how it engages with suppliers and affected stakeholders to agree on its strategy for risk management. [2021 Living Progress Report, 2022: assets.ext.hpe.com]<br>• Not Met: Risk management and response processes cover all minerals |

## E. Performance: Responses to Serious Allegations (20% of Total)

| 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, and so the score of 31.30 out of 80 points scored in themes A-D has been applied to produce a score of 7.83 out of 20 points for theme E. |