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May 18, 2023

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Business & Human Rights Resource Centre  
2-8 Scrutton Street, 2<sup>nd</sup> Floor  
London, EC2A 4RT  
United Kingdom

Dear Business & Human Rights Resource Centre,

We appreciate the opportunity to share our responses to the Business & Human Rights Resource Centre's questions, copied below:

- 1) Has your company put in place appropriate internal mechanisms and tools to carry out enhanced due diligence of your supply chains, intermediaries, customers and end-users to understand the risk of your products' diversion to Russia? If yes, please provide details.**

As an extension of the decision to exit the Russia, HP has stopped all sales and shipments to Russia and Belarus, and this prohibition extends to our distributors and resellers. We have deployed several controls to mitigate risk of diversion, including notifying our distributors/resellers of the prohibition, modifying contracts to incorporate the restriction, conducting due diligence on larger customers with worldwide operations to ensure the customers comply with HP's prohibition, and continuing to screen all customers and suppliers against sanctions and export restrictions lists of the U.S., EU, UK and other countries where HP does business. HP's trade compliance team conducts due diligence on customer and suppliers flagged during the screening process.

In certain countries with a high-risk of diversion, HP requires customers to certify that HP products will not be shipped to Russia or Belarus, and the customer will not deal with any third party the customer knows or has reason to believe will transfer/transport the goods to Russia or Belarus.

- 2) Does your company consider potential red flags that suggest the use of front companies that may hide the true end-users of your products and thereby evade sanctions and export controls? If yes, please provide details. (Potential red flags may include companies registered recently; companies based in Armenia, Belarus, Turkey, Kazakhstan, Kyrgyzstan, Uzbekistan or other [countries helping Russia circumvent sanctions](#); companies making large orders of products within a short space of time; companies with obscure beneficial ownership structures, etc.)**

HP screens all customers and suppliers. Such screens include analyzing the ownership structure of companies related to sanctioned parties. After scrutiny of the due diligence information, the trade compliance team determines whether to approve or reject the transaction.

**3) Has your company taken any other actions to prevent re-export of your products to Russia?**

HP employees have been informed of the Company's policy to exit Russia, and sales personnel have been trained on the processes and controls put in place to mitigate diversion risk. This training includes identifying red flags and how to contact HP's trade compliance team for review of questionable transactions. When such escalations occur, transactions are placed on hold pending the trade compliance team's approval.

Sincerely,

HP's Human Rights Team