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June 24, 2022

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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 efforts as it relates to our operations in Russia and/or Ukraine. Please find below the response from HP Inc. to the Business & Human Rights Resource Centre's request for information on *"Russian invasion of Ukraine: What companies have to say about their human rights due diligence."*

HP is deeply disturbed by the escalating war in Ukraine and the unfolding humanitarian crisis. This is a moment of grave difficulty for all Ukrainians and people around the world with loved ones in harm's way.

In February, HP suspended all shipments to Russia. On May 31<sup>st</sup>, we made the decision to stop all Russia activity and have begun the process of fully winding down our operations. We employ approximately 200 people in Russia and are committed to supporting them during this process. HP stands with the global community in calling for an immediate end to the violence and the restoration of peace in the region.

Please refer to our corporate [human rights policy](#), available in multiple languages, and website for updates on our sustainable impact and human rights efforts at [Sustainable Impact | HP® Official Site](#).

Regards,

Tu Rinsche  
HP Human Rights  
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## Business &amp; Human Rights Resource Centre Survey Questions

For companies operating in Ukraine

## Nature of involvement

1. **How long has your company or subsidiary been operating in Ukraine? In summary, can you briefly describe the nature, sector, scale, and geographic area of these operations?**

HP does not have any offices or employees based in Ukraine. HP products and services are provided in Ukraine through a network of channel partners.

## Assessing risks

2. **How is your company enhancing its due diligence to identify, prevent, and mitigate heightened human rights risks and comply with international humanitarian law?**
  - a. **What measures is your company taking to ensure it relies and acts upon robust monitoring of the situation, including through consultation with your workers, users, human rights groups, and/or humanitarian organizations?**

Embedded in our human rights commitment is a risk-based approach to conduct due diligence to identify, prevent, mitigate, and document potential and actual severe adverse human rights impacts. This requires risk sensing, risk assessment, engagement with a range of different entities, and auditing using relevant industry standards. We also assess performance and complete corrective action where required and integrate what we learn into our capability-building and prevention programs.

As a normal course of business, we operate in accordance with all applicable laws and regulations. We have a cross-functional team in place to identify and adapt to any required changes in our operations, as well as highly experienced teams who are well versed in navigating complex geopolitical situations. We are also in frequent communication with partners and customers throughout the region.

On our humanitarian efforts, The HP Foundation provided grants to support Ukrainian relief efforts - working with NGOs such as UNICEF, UNHCR and the Polish Red Cross, and matching all donations made through the HP Giving and Volunteering program. We will continue seeking even more opportunities to help where we can, including providing technology to refugees who have been forced to rebuild their lives.

Right now, our focus is on supporting our employees, partners and their loved ones who may be in harm's way. Their safety and wellbeing are our number one priority.

## Mitigating risks and tracking effectiveness

3. **What measures is your company taking to ensure that your business relationships, products, services, or other actions do not contribute to Russian military activities or occupation in Ukraine (incl. Crimea, occupied parts of Donetsk and Luhansk Oblasts)?**

HP does not have business relationships with the Russian military and is not knowingly contributing in any way to Russian military activities and occupation in Ukraine.

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- 4. For social media and other platform companies: What steps are you taking to prevent the spread of misinformation and disinformation by Russian state-sponsored actors and to stop targeting of Ukrainian users on your platform?**

HP is not a social media or other platform company.

- 5. For telecommunications companies and internet providers: What steps are you taking to maintain connectivity and prevent internet and communications shutdowns in Ukraine?**

HP is not a telecommunications company or internet provider.

- 6. What steps are you taking to secure communications to, from, and within Ukraine, as well as protect the data and rights to privacy of users?**

HP has an unwavering focus on cybersecurity. HP leverages the most sophisticated tools available to monitor against the threat of cyber intrusions into our networks and endpoint devices. We will continue to maintain the highest levels of vigilance and have processes in place to enable rapid response.

We recognize the fundamental importance of privacy, security, and data protection, which are critical pillars of brand trust. We design these principles into our products, services, and operations, and strive to exceed legal minimums across all of our operations.

- 7. What steps are you taking to protect the data and rights to privacy, and to secure the communications of people fleeing Ukraine, as well as the organizations and individuals who aid them at the border and beyond?**

HP does not have any offices or employees based in Ukraine.

HP recognizes the fundamental importance of privacy, security, and data protection to our employees, customers, and partners worldwide. We build privacy, security, and data protection into the design and development of our products, services, and operations. We strive to provide protections that exceed legal minimums across all our operations, and to deploy consistent, rigorous policies and procedures to give our customers, employees, and partners confidence when sharing information with us and using our products and services.

- 8. Have you made any changes to your advertising and monetisation policies and practices?**

On March 3<sup>rd</sup>, we shared that we have paused all marketing and advertising activities in the region.

- 9. Is your company or subsidiary planning to scale-down or suspend your operations in Ukraine? If so, what are the immediate and longer-term steps that your company has taken or is prepared to take to mitigate the negative impacts of this decision on your users, workers, and other affected stakeholders?**

HP does not have any offices or employees based in Ukraine. We are supporting employees with family and loved ones in Ukraine.

We have suspended all shipments and have been in communication with our channel partners.

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**10. Are you taking steps to preserve documentation of human rights abuses to aid potential future efforts to hold relevant actors accountable?**

HP is committed to respecting internationally recognized human rights. We understand that the conditions and contexts that give rise to human rights risks change constantly, and we need to respond quickly and appropriately. We monitor emerging human rights expectations and best practices to continue to demonstrate leadership in this rapidly evolving area wherever we do business.

Exercising leverage

**11. Is your company or subsidiary taking any other actions to promote respect for humanitarian law, human rights, democracy, and peace in Ukraine?**

Our human rights policies and practices advance our commitment to upholding human rights and engaging with rights holders. We believe our role as a global company is to respect human rights around the world, both in our operations and by influencing our suppliers through our business relationships. This work is consistent with the core values on which HP was founded and strives to live up to each day: to create a positive, lasting and sustainable impact on the planet, our people and the communities where we live, work and do business.

For companies operating in Russia

Nature of involvement

**1. How long has your company or subsidiary been operating in Russia? In summary, can you briefly describe the nature, sector, scale, and geographic area of these operations?**

HP Inc. Russia was established in 2015 to facilitate sales and servicing, both directly and through sales partners.

In February 2022, HP suspended all shipments to Russia. On May 31<sup>st</sup>, we made the decision to stop all Russia activity and have begun the process of fully winding down our operations. We employ approximately 200 people in Russia and are committed to supporting them during this process.

Assessing risks

**2. How is your company enhancing its due diligence to identify, prevent, and mitigate heightened human rights risks and comply with international humanitarian law?**

- a. **What measures is your company taking to ensure it relies and acts upon robust monitoring of the situation, including through consultation with your workers, users, human rights groups, and/or humanitarian organizations?**

As a normal course of business, we operate in accordance with all applicable laws and regulations.

We have a cross-functional team in place to identify and adapt to any required changes in our operations, as well as highly experienced teams who are well versed in navigating complex geopolitical situations. We are also in frequent communication with partners and customers throughout the region.

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Our Crisis Management Team and local leadership teams are closely monitoring the situation and have remained in contact with colleagues throughout the region to support their safety.

On our humanitarian efforts, The HP Foundation provided grants to support Ukrainian relief efforts – working with NGOs such as UNICEF, UNHCR and the Polish Red Cross, and matching all donations made through the HP Giving and Volunteering program.

Right now, our focus is on supporting our employees, partners and their loved ones who may be in harm's way. For employees, HP has established a dedicated employee support center for employees affected by the crisis. Their safety and wellbeing are our number one priority.

Mitigating risks and tracking effectiveness

- 3. As the situation in Ukraine unfolds, is your company or subsidiary planning to cease operations in Russia? If so:**
- a. What have been the key considerations informing this decision and did you consult with your workers, users, and/or other affected stakeholders as part of your decision-making process?**
  - b. What are the immediate and longer-term steps that your company has taken or is prepared to take to mitigate any negative human rights impacts of your exit on your users, workers, and other affected stakeholders?**

In late February, HP suspended all shipments to Russia and Belarus across our portfolio and paused all marketing and advertising activities. On May 31<sup>st</sup>, we made the decision to stop all Russia activity and have begun the process of fully winding down our operations.

Our Crisis Management Team and local leadership teams are closely monitoring the situation and have remained in contact with colleagues throughout the region to support their safety.

For other affected stakeholders, The HP Foundation provided grants to support Ukrainian relief efforts – working with NGOs such as UNICEF, UNHCR, and the Polish Red Cross, and matching all donations made through the HP Giving and Volunteering program. We will continue seeking even more opportunities to help where we can, including providing technology to refugees who have been forced to rebuild their lives.

- 4. If your company chooses to continue operating in Russia, what human rights due diligence has been undertaken and how are you planning to mitigate harm in Ukraine?**

On May 31<sup>st</sup>, we made the decision to stop all Russia activity and have begun the process of fully winding down our operations.

- 5. What kind of due diligence measures does your company use to ensure that it does not have any business relationships with sanctioned Russian individuals and entities? Beyond sanctions compliance, how does your company ensure that it does not have any business relationships with individuals or entities with a track record of rights violating conduct?**

As a normal course of business, we operate in accordance with all applicable laws and regulations. We will continue to abide by all standards that are set pertaining to our business. We are in frequent communication with partners and customers throughout the region.

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**6. For social media and other platform companies: What steps are you taking to prevent the spread of misinformation and disinformation by Russian state-sponsored actors?**

HP is not a social media or other platform company.

**7. Have you made any changes to your advertising and monetisation policies and practices?**

On March 3<sup>rd</sup>, we shared that we have paused all marketing and advertising activities in the region.

**8. For telecommunications companies and internet providers: What steps are you taking to prevent internet and communications shutdowns in Russia and ensure the Russian public remains connected?**

HP is not a telecommunications company or internet provider.

**9. Are you taking steps to preserve documentation of human rights abuses to aid potential future efforts to hold relevant actors accountable?**

HP is committed to respecting internationally recognized human rights. We understand that the conditions and contexts that give rise to human rights risks change constantly, and we need to respond quickly and appropriately. We monitor emerging human rights expectations and best practices to continue to demonstrate leadership in this rapidly evolving area wherever we do business.

Exercising leverage

**10. How does your company intend to use your leverage to protect the rights of your users and workers in Russia, including freedoms of association and expression?**

HP is committed to respecting human rights and upholding the fundamental rights and freedoms of all people across our business, in line with the UN Universal Declaration of Human Rights. We are doing everything we can to support our colleagues and employees in Russia.

**11. Is your company providing any support to Russian activists who are taking action against the war and in support of democracy and peace in Ukraine?**

HP is not providing such support.

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