

HPE India Corporate Social Responsibility (CSR) Policy

The CSR Policy document for:

- ❖ **Hewlett Packard Enterprise India Private Limited**
- ❖ **Hewlett Packard (India) Software Operation Private Limited**
- ❖ **Global E-Business Operations Private Limited**
- ❖ **Hewlett Packard Financial Services (India) Private Limited**
- ❖ **Hewlett Packard Enterprise GlobalSoft Private Limited**

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1 INTRODUCTION

1.1 HPE Philosophy

Founded in 1939, Hewlett Packard Company's founders, Bill Hewlett and Dave Packard started HP with a vision that has transformed HP & Hewlett Packard Enterprise (HPE) today into the one of largest providers of information technology infrastructure and solutions to individuals and organizations of all sizes. HPE aims to enrich society and drive sustainable economic growth by giving people and businesses innovative ways to be more creative, productive, and successful through the power of information. The founders, Bill and Dave, first put Global Citizenship on the list of HPE's corporate objectives in 1957. Being a good corporate citizen is integral to HPE's corporate purpose of advancing the way people live and work.

Idea and philosophy of HPE Living Progress is to create sustainable solutions for our company, customer and world. It's about how HPE does business! We set bold targets for our company, we empower our customers to do more while taking care of the environment, and leverage technology to solve the world's toughest social and environmental challenges.

In the words of Dave Packard, **"The betterment of society is not a job to be left to a few. It's a responsibility to be shared by all."** Today, Corporate Social Responsibility remains a core value and one of HPE's seven corporate objectives. With operations in more than 170 countries, HPE's scale means we can positively impact critical issues affecting communities worldwide. CSR, through our Living Progress initiatives is incorporated into HPE's business strategy, guiding where HPE can apply its technologies, influence and expertise to drive shared value and create a positive impact worldwide. HPE's CSR commitments include, but are not limited to, health care, education, energy and climate change, and betterment of the society through respect for universal human rights and the environment, acting with integrity and accountability and operating responsibly and sustainably.

1.2 Corporate Social Responsibility (CSR) in India

CSR in India has traditionally been seen as a philanthropic activity. While the corporate houses have been traditionally engaged in doing CSR activities voluntarily, the CSR provisions included in the Companies Act, 2013 put formal and greater responsibility on Indian companies to set out clear framework and process to ensure strict compliance.

The Companies Act 2013 (hereinafter referred to as 'the Act'), has introduced the idea of CSR to the forefront and through its "Comply-or-Explain" mandate. It mandates qualifying companies to constitute Corporate Social Responsibility

Committee (CSR Committee) constituted of the members of the Board of Directors of to effectively monitor CSR activities of the Company. Further the Companies (Corporate Social Responsibility Policy) Rules, 2014 updated from time to time (hereinafter referred to as “CSR Rules”) lays down the framework and modalities of carrying out CSR activities which are specified in Schedule VII of the Act.

The government, from time to time, amends the CSR Rules and has now included areas including supporting start-up companies, hosting & helping incubation activities, healthcare support in COVID-19 pandemic etc. and has also provided procedure to strengthen impact assessment and other controls.

2 OBJECTIVE & SCOPE

The main objective of this document is to lay down guidelines for the aforementioned HPE India entities to maintain CSR as one of the key focus areas to adhere to HPE’s Global Living Progress strategy that focuses on making a positive contribution to society through high impact, sustainable programs and also seek to align with the objectives of the HPE Foundation :

- Promote corporate citizenship and sustainability through Living Progress initiatives
- Ensure targeted stakeholder engagement
- Promote humanitarian help through HPE Giving.

This policy covers current as well as proposed CSR activities to be undertaken by the Company and examining their alignment with Schedule VII of the Act, as amended from time to time. It covers the CSR activities which are being carried out in India and includes strategy that defines plans for future CSR activities.

The Company proposes to implement its CSR activities in various sectors stated hereunder:

2.1 Targeted Sectors

- Healthcare
- Sanitation
- Drinking Water
- Education
- Vocational , Entrepreneurship Skills & Employment Opportunities
- Supporting old aged homes
- Environment protection and Go Green Initiatives (through Volunteer programs)
- Rural Development Projects
- Contribution to technology incubators located within academic institutions (through HPE technology such as IoT, Aruba WiFi & Networking solutions, 3PAR storage, high end servers etc.)

- Financial inclusion, Financial literacy and circular economy awareness
- Volunteering programs in any of the areas as mentioned in Schedule VII
- Any other area as may be prescribed by Schedule VII amended from time to time

The CSR Committee and the Board of Directors of the Company is empowered to review the sectors from time to time and make additions/deletions to the above sectors.

3 CSR COMMITTEE

3.1 Constitution

Pursuant to the provisions of Section 135 of the Act, the Board of Directors shall constitute the Corporate Social Responsibility (CSR) Committee. The Members of CSR Committee shall be appointed by the Board of Directors of the Company which must consist of at least two or more Directors.

3.2 Powers of the CSR committee

Following are the powers of the CSR committee:

- (i) Formulate & update CSR Policy as appropriate and recommend the same to the Board of Directors for approval;
- (ii) Recommend CSR activities as part of annual CSR plan as stated under Schedule VII of the Act;
- (iii) Recommend collaboration with other Companies/ firms/ NGOs etc. to undertake CSR activities;
- (iv) Monitor the allocated CSR budget and spend on the CSR activities;
- (v) Periodic monitoring of the CSR projects and review of the HPE India CSR Policy.

3.3 Frequency of the Meetings of the CSR Committee

The CSR Committee shall endeavor to meet at least once in a quarter or as required under the Act/ CSR Rules. Quorum for the meeting shall be two. The members of the Committee may participate in the meeting either in person or through video conferencing or other audio visual means in accordance with the provisions of the Companies Act, 2013 and CSR Rules. Members of the HPE Foundation and Living Progress Team of HPE can be the invitees to the said Meetings. Other Members of the Senior Management may attend the CSR Committee Meetings as may be appropriate, subject to the approval of the CSR Committee. Minutes of the CSR Committee shall be placed before the Board of Directors for noting.

4 CSR BUDGET/CSR SPEND

The Act mandates companies meeting the qualification criteria to allocate certain portion of its average net profits of a company made during the three immediately preceding financial years to be spent on CSR Activities that fall under purview of Schedule VII of the Act.

4.1 CSR Expenditure:

Net profit means profit more fully described under Rule 2(f) of the CSR Rules. The CSR expenditure shall include all expenditure including contribution to corpus or on projects or programs relating to CSR activities approved by the Board of Directors on the recommendation of its CSR Committee but does not include any expenditure on an item not in conformity or not in line with activities stated under Schedule VII of the Act.

4.2 Expenditure on CSR capabilities

The company may build CSR capabilities of their own personnel or of their Implementing Agencies. However, as per the Act, the overall administrative expenditure shall not exceed 5% of the total CSR spend of the company as stated in the CSR rules. In order to determine whether a particular expense falls within this cap, the Board of Directors or CSR Committee may seek consultation from the relevant stakeholders including from the Head of Finance Controllership or India Country Counsel as required based on clarifications from Ministry of Corporate Affairs in this regard.

4.3 Failure to spend the CSR Budget for any Financial Year

In case, the Company fails to spend the targeted budget amount in a particular financial year, the Committee shall inform the Board of Directors which in turn shall be reported by the Board of Directors in their Directors' Report for that particular Financial Year.

5 CSR INITIATIVES

In line with Schedule VII of the Act and the CSR Rules, the Company shall undertake CSR activities included in its Annual CSR Plan, as recommended by the CSR Committee preferably at the beginning of each financial year. The Committee is authorized to approve any modification to the existing Annual CSR Plan or to propose any new program during the financial year under review.

5.1 Annual CSR Plan

The Annual CSR Plan is a yearly plan of CSR activities that would be placed before the Board of Directors of the Company based on recommendation of its CSR Committee which outlines the following aspects of CSR initiatives of the Company:

- Tailor-made CSR projects for the particular financial year depending upon allocated spend and geographical presence
- Partnering agencies/companies/firms
- Process Owners
- Project Proposals
- Targeted Beneficiaries & their key needs
- Alignment with Schedule VII
- Project Goals and milestones
- Activities and Timelines including expected closure dates
- CSR Budget with projections
- Monitoring mechanism
- Progress reporting and frequency of reports
- Risks and mitigation strategies
- Any other information as may be required by the CSR Committee

5.2 Collaboration

The Company may collaborate with other HPE Group entity or any other Company/ NGOs as may be recommended by the CSR Committee to implement CSR activities. The Company may form trusts on its own to carry out CSR activities in accordance with the CSR Rules and to administer its CSR activities. Subject to the approval of the Board of Directors and applicable provisions of Act/ CSR Rules, the Company may also collaborate its CSR activities with other HPE Affiliates or its subsidiaries or any other Company and towards this effort, the Company may jointly along with other HPE Affiliates or its subsidiaries or any other Company form Trusts to administer the CSR activities.

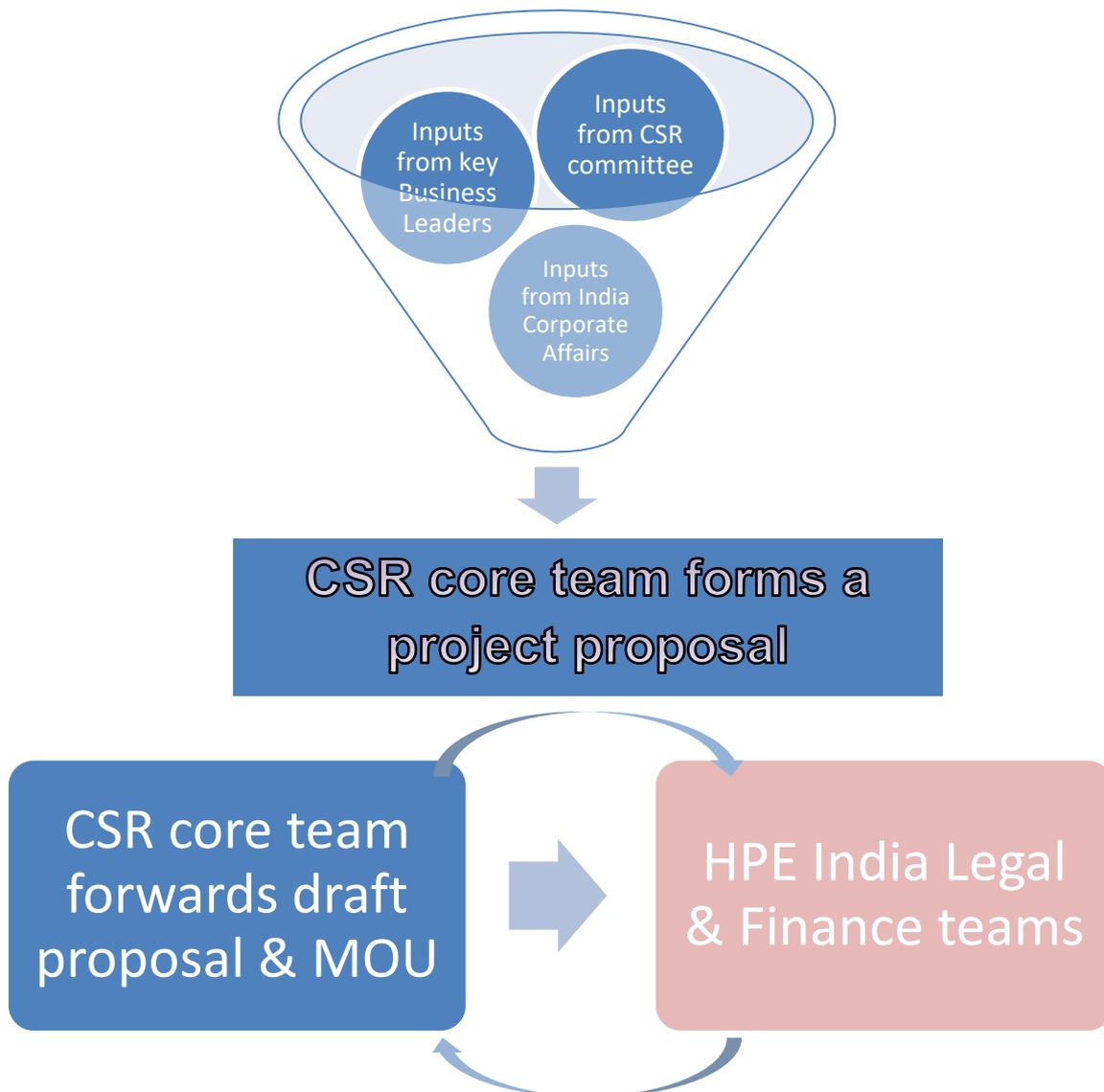
5.3 Monitoring Mechanism

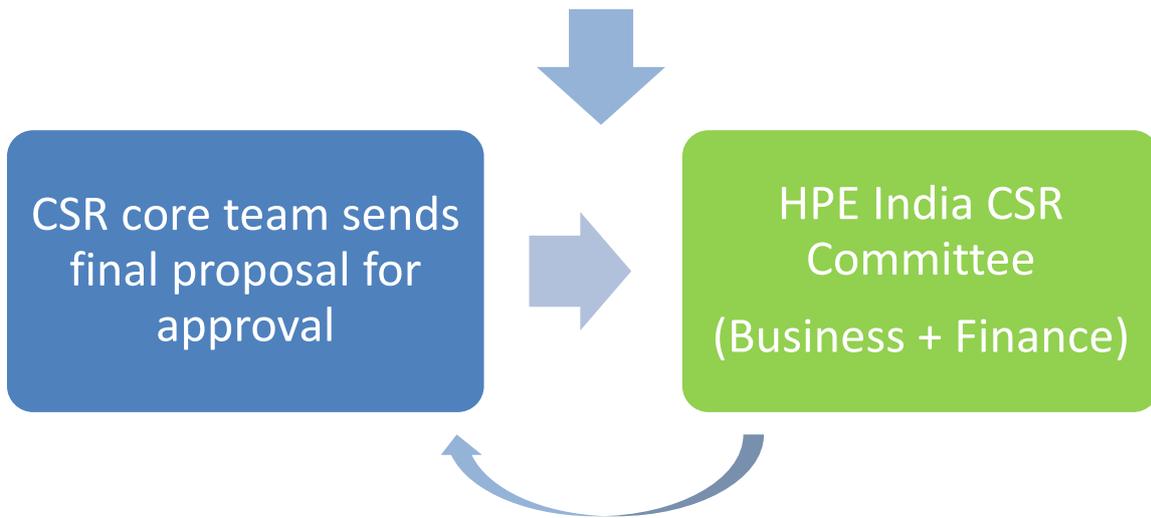
A Joint Working Group (JWG) (aka CSR core team) comprising of members of HPE India CSR team, and supported by representatives of legal and finance controllership teams shall be formed. JWG shall ensure effective implementation and monitoring of the projects approved by the CSR Committee. The responsibilities of the JWG include

- Create & maintain transparent monitoring mechanism for proposal, approval, implementation & reporting of CSR Initiatives in India
- To submit periodic reports to the CSR Committee or Board of Directors of the Company on the progress of the various projects approved by the CSR Committee and entrusted to the JWG for implementation and monitoring.

5.4 CSR processes

5.4.1 Approval flow for CSR projects



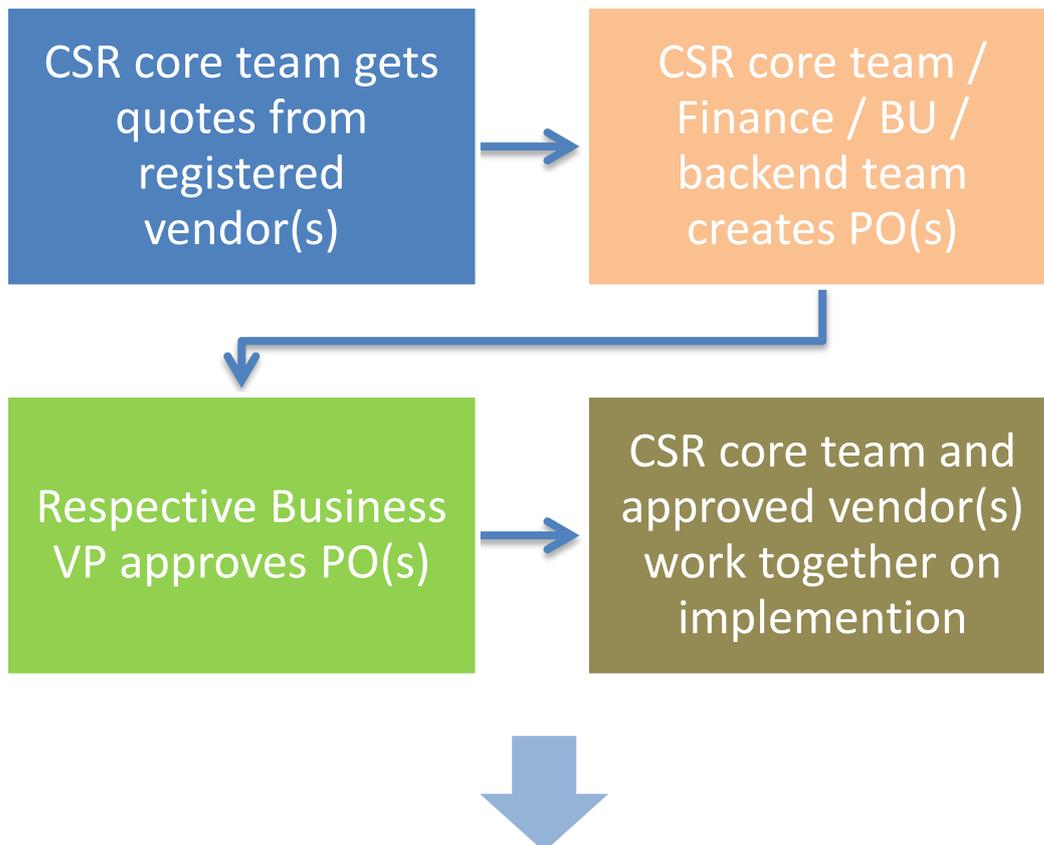


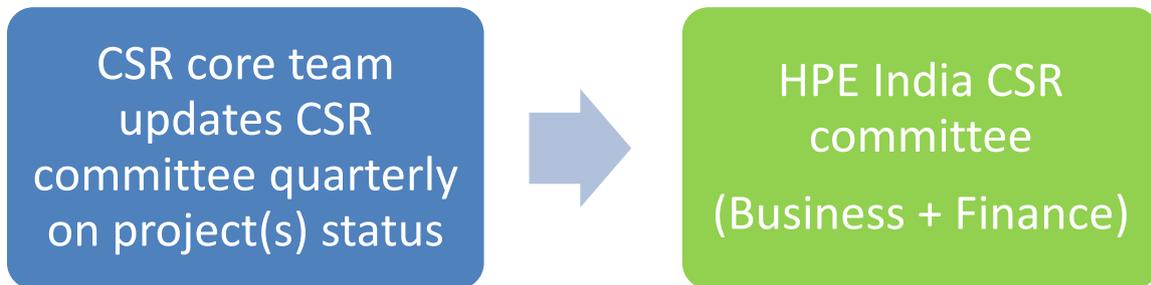
5.4.2 Vendor addition for CSR projects

Majority of the CSR projects are completed through third party and existing vendors which are identified as per the internal procurement policy and pricing (with HPE India procurement team)

If a new vendor needs to be added to execute any CSR project, the CSR core team works with the respective Business Units (BU) or with help of finance & procurement team to add a vendor to HPE’s system which can then be partner for the approved CSR project.

5.4.3 Execution of a CSR project





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5.5 Reports

The format of the Report that are required to be placed before the Board shall be the format prescribed under the CSR Rules stated hereunder:

S.no	CSR Project or Activity Identified	Sector which the project is covered	Project or Programs 1) Local Areas, 2) Specify the state and district where projects or programs was undertaken	Budget (Project or Program	Amount spent on Project or Program	Cumulative Expenditure	Amount Spent Direct or through Agency	Target Date & Status
					a)Direct Expenditure			
					b)Overheads			

6 PUBLICATION OF CSR POLICY & PROGRAMS

6.1 Publication of the CSR Policy

As per the CSR rules, the contents of the CSR Policy shall be included in the Directors' Report and the same shall be displayed on the Company's website, if any.

7 Selection of partner for HPE CSR project(s)

7.1.1 Process of selection of NGOs

The NGOs / Partners will be selected based on satisfaction of following broad criteria:

- Original proposal
- Background of the Institution.
- Area where project activity will be carried
- Completion of the Due Diligence Check list
- Anti-Corruption Checklist and sign off

Once the criteria mentioned above are satisfied, the JWG will vet the NGO and its proposal and take Legal and Finance controllership approval before recommending to the CSR committee for approval.

8 POLICY REVIEW & FUTURE AMENDMENT

The CSR Committee shall annually review its CSR Policy and make suitable changes as may be required and submit the same for the approval of the Board.

Revision History:

V 1.0 : 2014 : Original HP India CSR policy

V 1.1 : Jun-2017 : Updated the policy to reflect

- **HPE & HP India separation in 2015**
- **Services merge-spin and software spin-off in 2017**

V 1.2 February 2018: Updated the policy to further clarify Targeted sectors

V 2.0 28-May-2018 : Added all HPE India legal entities

V 2.1 25-Mar-2019 :

- **Incorporated feedback from Corporate Affairs team**
- **Added CSR approval process infographics**

V 2.2 29-Apr-2019 :

- **Incorporated feedback from HPE India Legal team**

V3.0 18th May 2020

- **Updated policy for IFY 20-21;**

V 3.1 30th June 2020

- **Incorporated a few changes suggested by HPE Legal**