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Introduction

This Global Business Amenities Policy establishes HPE’s standards for providing or receiving business amenities to or from third parties and helps implement the principles in HPE’s Anti-Corruption Policy. This Policy applies to all HPE employees worldwide and for all recipients worldwide, except that amenities to U.S. Public Sector employees are covered separately in the U.S. Business Amenities Policy. An “amenity” is anything of value; amenities may be in the form of gifts, meals, travel, entertainment, prizes, event tickets, loans, or any other item of value.

Before providing any business amenity, ask yourself these questions:

- What is expected if you offer or accept the amenity? Is the amenity in exchange for a reciprocal action or to secure an improper advantage? (If the amenity creates an expectation of receiving anything in return, or appears to do so, then you should not give or accept it.)

- Does the amenity create an appearance of impropriety, or an appearance of undue influence? (For example, you should not give or accept an amenity from a counter-party during contract negotiations.)

- Is the amenity of a type that is not allowed under this Policy? (Certain types of amenities, such as cash and sexually explicit items, are never allowed.)

- Is the recipient Public Sector or Commercial Sector? (As explained further below, what might be acceptable for Commercial Sector recipients might not be acceptable for Public Sector recipients.)

- Does the total value of the amenity exceed the limit set forth in this Policy for the particular type of amenity? (Monetary limits based on the type of amenity and recipient are set forth in the tables below.)

- Does the amenity exceed the frequency limits set forth in this Policy? (Typically, most amenities are limited to once per quarter.)

- Does the amenity violate any country-specific rule? (The country-specific rules are located at the end of this Policy. You should consider the country-specific rules for where the recipient works.)

- Have I received the necessary approvals and submitted it in the Amenities Approval Tool if required? (All Events and all Public Sector amenities must be pre-approved through HPE’s Amenities Approval Tool. You also must seek pre-approval through the Amenities Approval Tool to give or accept other amenities worth more than $500, as described below.)

This Policy does not cover something given as part of a sale or which the recipient has a contractual right to receive; for example, items of value provided in connection with sales promotions or awards earned from participation in an established sales incentive program. HPE’s Anti-Corruption Policy includes guidelines for such activities. Marketing and Sales policies and HPE’s Conflicts of Interest Policy also may apply.

This Policy addresses business amenities provided to or from third parties. Amenities provided by HPE as a company to HPE employees, or amenities given from one HPE employee to another HPE employee, are not covered by this Policy.

Violations of this Policy may lead to disciplinary action, up to and including termination of employment with HPE. Many countries have established strict laws regarding bribery, and our employees must be aware that their conduct could expose both HPE and themselves to criminal and civil liability.
**Prohibited Items**

HPE employees may never accept or provide the following:

- Any item or entertainment that is illegal, contains sexually explicit content, involves sexually explicit conduct, involves gambling, or would otherwise create embarrassment to the company.
- Excessive, lavish, or frequent amenities.
- Any amenity that is not permissible under the internal rules of the recipient’s organization.
- Cash and cash-equivalent gift cards, such as American Express, Visa, or Mastercard gift cards.
- Gold and other precious metals, expensive jewelry, or gemstones.
- Any item or entertainment to or from a third party involved in a pending competitive bid process or contract negotiation with HPE.
- Amenities for the immediate family members (parents, children, spouses, and in-laws), significant others, close friends, and business associates (e.g., agents, consultants, etc.) of third parties. The only exception is the infrequent attendance of an immediate family member or significant other of a Commercial Sector recipient at an activity where the family members or significant others of HPE employees are also attending, or where it would otherwise be customary for a family member or significant other to attend.

You may not use third parties to avoid the limits in this Policy. In other words, you may not indirectly provide or receive any amenity through a third party that this Policy would prohibit you to provide or receive directly. This includes asking a third party to pay for any business amenity on HPE’s behalf, for example, asking a partner to pay for an amenity and seek reimbursement from HPE Market Development Funds.

This Policy applies to all things of value that you may give to a third party, regardless of whether the item was purchased by you, someone else, or HPE. Even if the thing of value was provided free of charge or at a reduced cost to you or to HPE, or if you used personal funds for the purchase, you must comply with the rules in this Policy. Similarly, if you are purchasing a business amenity with funds provided by an HPE partner, you must comply with this Policy, including the approval requirements and limits described below.

You may not actively seek a business amenity. HPE employees may never solicit any gift, entertainment, travel, meal, fee, favor, personal discount, or other item of value from any other person or organization.

**How to Use this Policy**

To determine whether you can provide or receive business amenities, consult the general principles in this Policy, the tables below, and the country-specific rules at the end of this Policy. The tables set forth monetary limits and, where applicable, approval requirements based on the type of recipient (Public Sector, Commercial Sector, or HPE employee) and the type of business amenity. As stated in the tables below, this Policy requires that you always seek approval through HPE’s Amenities Approval Tool before providing any amenity to a Public Sector recipient, regardless of value. In other instances, this Policy may require you to seek written approval from your Manager, Director, or Vice President, or through the Amenities Approval Tool, depending on the type and value of the amenity. For more information, see the discussion of [Documentation and Approvals](#).
**Frequency**

As a general rule, you may not give an amenity to the same individual recipient more than once per quarter, and you may not accept an amenity from the same individual or organization more than once per quarter.

A limited exception to this frequency limit exists for low value gifts (US$0–US$50) and low value business meals/entertainment (US$0–US$150), provided that the amenities are given to a Commercial Sector recipient (not Public Sector) or received from a third party; you have a legitimate business purpose for doing so in each instance; the amenities collectively do not create the appearance of impropriety; and you otherwise follow this Policy. As described below, the frequency limitation also may be relaxed for amenities that are approved through an Amenities Approval Tool request for Event approval and then provided to all attendees of an approved Event. At such Events, attendees may receive multiple amenities offered to all event attendees as a part of the conference experience.

**Definitions**

“Public Sector” refers to:

- Any officer or employee of a Public Sector entity, or any person acting in an official capacity for or on behalf of a Public Sector entity. A “Public Sector entity” includes any entity in which a government has greater than 50% ownership or is controlled by a government. In countries with government-owned or operated institutions or industries, such as healthcare, education, energy, telecom, banking, or transportation, you should assume these entities are Public Sector, and you should consult your HPE attorney with any questions.
- Members of royal families.
- Candidates for a political office.
- Immediate family members (parents, children, spouses, and in-laws), significant others, close friends, and business associates of a Public Sector employee.
- Any other person as defined by country-specific rules set forth at the end of this Policy.
- In the United States, public and private K-12 educational institutions and all libraries are considered “Public Sector” entities for the purpose of this Policy and the U.S. Business Amenities Policy.

“Commercial Sector” is anything other than Public Sector, including privately owned and controlled entities.

The “total value” of an amenity is the fair market value of the item that is being provided to a recipient. Normally, “total value” will be the total cost of the item, including taxes, gratuities, and shipping costs. In situations where you or HPE has received the item free or for a discounted price, or where the exact value is otherwise unknown, you must use best efforts (such as an internet search) to calculate fair market value.
Events

An “Event” is an activity that involves 10 or more attendees and $5000 or more in contractual obligations related to arranging the activity, and where HPE products and services are showcased. Activities for fewer than 10 attendees or with less than $5000 in contractual obligations should be treated as stand-alone amenities, not as “Events” for purposes of this Policy. Events are discussed in more detail in the HPE Meetings and Events Policy.

All Events hosted or co-hosted by HPE (or by a third-party agent engaged by HPE) must be pre-screened through the Amenities Approval Tool—there are no exceptions. In addition, if an HPE employee is actively involved in planning the event, such as by having input into the agenda, the invitees, and/or what business amenities are to be provided, then the HPE employee is also responsible for pre-screening the Event through the Amenities Approval Tool. Otherwise, partner-hosted Events are not required to be screened in the Amenities Approval Tool.

Requests for Event approval should be submitted at least two weeks in advance of issuing invitations, and invitations may not be issued until the Event has been approved. If the Event is approved, you must return to the Amenities Approval Tool and enter details of the Event including actual attendees and total value of business amenities provided.

Although the frequency limits on amenities may be relaxed for Events where a combination of amenities are provided to create a “conference experience,” all Events must comply with the following requirements:

• Events must be for a legitimate purpose to demonstrate or promote HPE’s products and services.

• The entire Event, viewed as a whole, must be primarily about business, and should not be lavish. The business nature of the Event should be apparent from reviewing the agenda and applying reasonable judgment.

• The agenda of the Event should contain at least 80% business activities and no more than 20% leisure activities. The “clock” starts at the beginning of the entire Event, not just the business portion of the Event, and runs during the time when an individual attendee is taking part in any activity that is planned, hosted, or funded by HPE. Business activities include business presentations, exhibitions, Q&A sessions, and transfers to the place of business activities.

• HPE will not pay for any side trips for Event participants.

• A relatively small amount of unscheduled, sightseeing or recreational time is acceptable, provided those activities are minimal and incidental in nature.

• All meals, gifts, and entertainment must be included in the request submitted to the Amenities Approval Tool. This Policy sets forth the acceptable monetary limits and other requirements for amenities provided during an Event.

• Any raffle/lucky draw conducted in connection with an Event must be included in the request submitted to the Amenities Approval Tool. Raffles and lucky draws also should comply with the Raffles/Lucky Draws guidelines.
Gifts, Entertainment, and Meals

Gifts for Public Sector recipients outside of the U.S. must be pre-approved through the Amenities Approval Tool. The only exception is business gifts of nominal value with HPE branding, such as pens, calendars, memo pads, T-shirts, and coffee mugs with HPE logos—those HPE branded items do not need pre-screening through the Amenities Approval Tool. You generally may give or accept gifts of nominal value to Commercial Sector recipients, as stated in the tables below.

This Policy distinguishes between “gifts” and “entertainment.” If an HPE employee is attending an activity (such as a concert, theater, or sporting event) with the third party, then the event is considered entertainment. If an HPE employee is not attending, then the tickets are considered gifts. As stated in the tables below, the allowed limits for entertainment are generally higher than those for gifts. All entertainment of Public Sector recipients must be pre-approved through the Amenities Approval Tool.

In addition to the approval requirements and limits described in the tables below, meals and entertainment must comply with the following guidelines:

- Business meals and entertainment must be for the express purpose of furthering a business relationship.
- All meal and entertainment expenses must be reasonable in cost, not lavish, and paid directly to the third-party vendor rather than making any payments for meals or entertainment to the recipient.
- When providing a meal or entertainment, the most senior HPE employee in attendance must pay, and his or her manager must then authorize the charge. Such authorization, however, does not replace pre-approval via the Amenities Approval Tool where required according to this Policy.

If a meal or entertainment is being provided in connection with an HPE-sponsored Event, consult the Events section.

Travel

Travel expenses generally may be offered or accepted for legitimate business purposes, including the promotion, demonstration, or explanation of HPE’s products or services.

Travel must comply with the following guidelines:

- All travel for Public Sector customers must be pre-approved through the Amenities Approval Tool. Approval requirements for Commercial Sector and HPE employee travel depend on the value of the travel and whether it is in connection with an Event, as detailed in the tables below.
- Any HPE-sponsored travel should be limited to once per quarter per recipient.
- The class of travel must be appropriate and reasonable: Economy class is required for domestic flights and for international flights less than 5 hours; business class is allowed for international flights longer than 5 hours.
- We do not pay for any travelers to take side trips. Any unscheduled or recreational time (such as sightseeing) should be minimal and incidental in nature.
- All travel expenses must be paid directly to the vendor (i.e., airline, hotel, restaurant, etc.) rather than making any payments to the recipient. Per diem, cash, checks, or equivalents to the third-party travelers are strictly prohibited.
- Travel may not be provided to spouses or other family members or acquaintances of the recipient. Exceptions may be made only upon written approval from the Ethics & Compliance Office.
Raffles/Lucky Draws

Raffles or “lucky draws” are marketing activities in which a winner is randomly selected to receive a thing of value. Because it can be difficult to determine if a Public Sector official might be the recipient of a raffle prize, all raffles and lucky draws that are hosted by HPE must be submitted for pre-approval to the Amenities Approval Tool. If you plan to conduct a raffle or lucky draw during an Event, you must include details of the proposed activity—including the total value of the proposed award—when pre-screening the Event through the Amenities Approval Tool. If the raffle or lucky draw will be conducted outside of an Event, it must be separately entered into the Amenities Approval Tool.

All raffles and lucky draws also must comply with the following guidelines:

- Winners should complete a Raffle Acceptance Form.
- Winners also may be required to complete a country-specific tax form; contact your local controller for guidance before conducting the activity.
- Completed forms must be maintained by the HPE employee organizing the activity in accordance with HPE’s corporate record retention guidelines.

Business Amenities Limits and Approval Requirements

The limits in the tables below must be followed unless a more restrictive country-specific rule applies.

Table 1. Business Amenities Provided to non-U.S. Public Sector Recipients
(unless more restrictive country-specific rules apply; click here to check)

<table>
<thead>
<tr>
<th>Type of Business Amenity</th>
<th>Total Value (USD)</th>
<th>Prior Written Approval Requirements</th>
</tr>
</thead>
<tbody>
<tr>
<td>Gifts</td>
<td>$0–$50</td>
<td>Amenities Approval Tool</td>
</tr>
<tr>
<td></td>
<td>$50.01+</td>
<td>Not allowed</td>
</tr>
<tr>
<td>Meals and/or entertainment (when an HPE employee is attending with the recipient)</td>
<td>$0–$150</td>
<td>Amenities Approval Tool</td>
</tr>
<tr>
<td></td>
<td>$150.01+</td>
<td>Not allowed</td>
</tr>
<tr>
<td>Travel/accommodations</td>
<td>$0+</td>
<td>Vice President approval &amp; Amenities Approval Tool</td>
</tr>
<tr>
<td>Raffle/lucky draw hosted by HPE</td>
<td>$0+</td>
<td>Amenities Approval Tool</td>
</tr>
</tbody>
</table>
### Table 2. Business Amenities Provided to Commercial Sector Recipients
(unless more restrictive country-specific rules apply: click here to check)

<table>
<thead>
<tr>
<th>Type of Business Amenity</th>
<th>Total Value (USD)</th>
<th>Prior Written Approval Requirements</th>
</tr>
</thead>
<tbody>
<tr>
<td>Gifts (including tickets or passes to concerts or sporting events when an HPE employee is not in attendance)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>$0–$50</td>
<td>Approval not required</td>
<td></td>
</tr>
<tr>
<td>$50.01–$150</td>
<td>Manager approval</td>
<td></td>
</tr>
<tr>
<td>$150.01–$500</td>
<td>Director approval</td>
<td></td>
</tr>
<tr>
<td>$500.01+</td>
<td>Vice President approval &amp; Amenities Approval Tool</td>
<td></td>
</tr>
<tr>
<td>Meals and/or entertainment (when an HPE employee is attending with the recipient)</td>
<td>$0–$150</td>
<td>Approval not required</td>
</tr>
<tr>
<td>$150.01–$500</td>
<td>Manager approval</td>
<td></td>
</tr>
<tr>
<td>$500.01+</td>
<td>Vice President approval &amp; Amenities Approval Tool</td>
<td></td>
</tr>
<tr>
<td>Travel/accommodations (not related to attendance at an Event that has been separately pre-screened through the Amenities Approval Tool)</td>
<td>$0–$500</td>
<td>Vice President approval</td>
</tr>
<tr>
<td>$500.01+</td>
<td>Vice President approval &amp; Amenities Approval Tool</td>
<td></td>
</tr>
<tr>
<td>Combination travel/accommodations, gifts, meals, and/or entertainment (not related to attendance at Event that has been separately pre-screened through the Amenities Approval Tool)</td>
<td>$0–$500</td>
<td>See approval requirements for each type of business amenity</td>
</tr>
<tr>
<td>$500.01+</td>
<td>Vice President approval &amp; Amenities Approval Tool</td>
<td></td>
</tr>
<tr>
<td>Raffle/lucky draw hosted by HPE</td>
<td>$0+</td>
<td>Amenities Approval Tool</td>
</tr>
</tbody>
</table>

### Table 3. Business Amenities Received by an HPE Employee from a Third Party
(unless more restrictive country-specific rules apply: click here to check)

<table>
<thead>
<tr>
<th>Type of Business Amenity</th>
<th>Total Value (USD)</th>
<th>Prior Written Approval Requirements</th>
</tr>
</thead>
<tbody>
<tr>
<td>Gift (including tickets to concerts or sporting events when the third party providing the amenity is not in attendance)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>$0–$50</td>
<td>Approval not required</td>
<td></td>
</tr>
<tr>
<td>$50.01–$150</td>
<td>Manager approval</td>
<td></td>
</tr>
<tr>
<td>$150.01–$500</td>
<td>Director approval</td>
<td></td>
</tr>
<tr>
<td>$500.01+</td>
<td>Vice President approval &amp; Amenities Approval Tool</td>
<td></td>
</tr>
<tr>
<td>Meals and/or entertainment (with the third party providing the amenity in attendance)</td>
<td>$0–$150</td>
<td>Approval not required</td>
</tr>
<tr>
<td>$150.01–$500</td>
<td>Manager approval</td>
<td></td>
</tr>
<tr>
<td>$500.01+</td>
<td>Vice President approval &amp; Amenities Approval Tool</td>
<td></td>
</tr>
<tr>
<td>Travel/accommodations</td>
<td>$0–$500</td>
<td>Vice President approval</td>
</tr>
<tr>
<td>$500.01+</td>
<td>Vice President approval &amp; Amenities Approval Tool</td>
<td></td>
</tr>
<tr>
<td>Combination travel/accommodations, gifts, meals, and/or entertainment</td>
<td>$0–$500</td>
<td>See approval requirements for each type of business amenity</td>
</tr>
<tr>
<td>$500.01+</td>
<td>Vice President approval &amp; Amenities Approval Tool</td>
<td></td>
</tr>
<tr>
<td>Participation in raffle/lucky draw</td>
<td>$0–$999.99</td>
<td>Approval not required</td>
</tr>
<tr>
<td>$1000+</td>
<td>Manager approval</td>
<td></td>
</tr>
</tbody>
</table>
Documentation and Approvals

Business amenities must be provided openly and transparently.

Any required approvals must be in writing and obtained in advance of providing or receiving the business amenity. Approvals must be obtained and pre-screened through the Amenities Approval Tool for all amenities to Public Sector recipients, all Events, and certain other amenities as set forth in the tables above. As a general rule, requests should be submitted to the Amenities Approval Tool at least two weeks in advance.

Other than prior approvals, which must be obtained through the Amenities Approval Tool, the written business approvals (e.g., HPE Manager, Director, and Vice President) required by the Policy can be documented through an email or in any other form that creates a record that can be saved. You must keep accurate records of all business amenities provided to or received from any third party (including the name and entity of the third party), and retain them in accordance with the HPE Records Management Policy.

All uses of HPE funds and assets must be documented in compliance with the HPE Accounting and Finance Manual and HPE employees must follow all expense reimbursement rules to obtain reimbursement of business amenities. As a reminder, the most senior person in attendance at a meal/entertainment must pay so that his or her manager would then review and authorize the charge.

Country-Specific Rules

Several countries have adopted country-specific rules related to business amenities. A summary of those laws is contained here. Please contact your local HPE attorney or the Ethics & Compliance Office with any questions.

Reporting Violations or Concerns

Violations of this Policy may lead to disciplinary action up to and including termination of employment with HPE. Any employee with knowledge or suspicion of any violations of this Policy must report these concerns to the Ethics & Compliance Office at corporate.compliance.hpe@hpe.com.

You also may call HPE’s 24-hour confidential ethics hotline. Employees in the following countries can reach the ethics hotline by dialing the applicable number below:

<table>
<thead>
<tr>
<th>Table 4. HPE’s 24-hour Ethics Hotline</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Country</strong></td>
</tr>
<tr>
<td>United States/Canada/Puerto Rico</td>
</tr>
<tr>
<td>China</td>
</tr>
<tr>
<td>Malaysia</td>
</tr>
<tr>
<td>Singapore</td>
</tr>
<tr>
<td>United Kingdom</td>
</tr>
</tbody>
</table>

Employees in all other countries should use the International Dialing Guide to locate your AT&T Direct Access Number—select the country you are calling from and select the United States as the country you are calling. Dial the Direct Access Number provided. When prompted, dial 855-409-0075.

Any person who, in good faith, reports suspected legal, ethical or policy violations will not suffer any adverse consequences for having done so. Retaliation in any form against an individual who in good faith reports a suspected violation of this Policy, or who assists in the investigation of a reported violation, is prohibited. Acts of retaliation should be reported immediately to the Ethics & Compliance Office or the ethics hotline.
Ask Questions—Seek Answers

All HPE employees are encouraged to ask questions and seek answers. If you have questions about this Policy, please raise them with your management or contact the Ethics & Compliance Office. You can email corporate.compliance.hpe@hpe.com.

If you have questions or need assistance with the Amenities Approval Tool, email amenities_aat@hpe.com.

For scenarios and additional guidance on providing business amenities, see the Global Business Amenities Policy FAQs.

Revision History

<table>
<thead>
<tr>
<th>Revision</th>
<th>Description of Change</th>
</tr>
</thead>
<tbody>
<tr>
<td>Policy number</td>
<td>HPE011-02</td>
</tr>
<tr>
<td>Nov 01, 2015</td>
<td>Initial release of policy for Hewlett Packard Enterprise</td>
</tr>
<tr>
<td>Rev. 1, Jan 19, 2017</td>
<td>Policy revised with updated hyperlinks</td>
</tr>
<tr>
<td>Rev. 2, Feb 06, 2017</td>
<td>Updated hyperlinks</td>
</tr>
<tr>
<td>Rev. 3, Jul 01, 2018</td>
<td>Policy revised</td>
</tr>
<tr>
<td>Rev. 4, Aug 20, 2018</td>
<td>Updated hyperlinks</td>
</tr>
<tr>
<td>Rev. 5, Feb 15, 2019</td>
<td>Updated translations section with few additional languages</td>
</tr>
</tbody>
</table>

Translations

SharePoint link containing the translations

- Arabic
- Chinese—Simplified
- Chinese—Traditional
- Czech
- Dutch
- French
- German
- Greek
- Hebrew
- Hungarian
- Indonesian
- Italian
- Japanese
- Korean
- Malaysian
- Polish
- Portuguese
- Russian
- Spanish
- Thai
- Turkish
- Vietnamese

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