



Global Business Gifts, Travel and Entertainment Policy

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Introduction

This policy sets minimum standards for giving or receiving business amenities and applies to all HP employees worldwide.

What is a business amenity? A business amenity is anything of value or something that provides a value to the recipient. **Business amenities can take many forms and include** any gift, meal, travel, service, prize, event ticket/pass, promotion, entertainment, reimbursement, loan, favor, or anything else of value, whether given or received by an HP employee, directly or indirectly.

Other rules may be more restrictive – if so, the more restrictive rule applies. Some countries, HP business groups, or local country organizations may have additional, more restrictive laws or rules and approval processes that apply to business amenities. You must be aware of and abide by this policy, those local laws and rules, any local policy your country has implemented or that applies to the country of which the recipient is a citizen, and any rules set by the recipient's employer. The country-specific policies at the end of this document may have more or less restrictive dollar thresholds and take precedence over this global policy to the extent they expressly modify the terms of this global policy. Contact your HP attorney for guidance, if necessary.

This policy does not apply to:

- Business amenities, events or activities involving only HP employees. Internal gifts/meal/entertainment, events or activities involving only HP employees are governed by the [HP Global Travel Policy](#);
- Political contributions made by HP employees. Political contributions are governed by HP's [Political Participation Policy](#);
- Philanthropic efforts made by HP or HP employees. These are governed by the [Global Contributions Policy](#);
- Sponsorships are governed by the [Sponsorship Principles Policy](#); or

- Sales performance incentives. Relatively small dollar value incentives or other bonus-related payments, which form part of the compensation to an employee of any third party entity for specific sales performance. Such incentive programs must be approved within the appropriate business and local legal.

Please refer to the [Hospitality and Promotional Activity Guidelines](#) for an overview and summary of HP's rules in the above referenced areas.

Exceptions to this global policy apply only in the instances specifically stated below or in a country-specific policy. Any other proposals for exceptions must be approved by the Chief Ethics and Compliance Officer. All exceptions of any sort, including those allowed by this global policy or a country-specific policy with certain approvals, must be evidenced in writing. Records of any exceptions must be maintained by the person who relied upon the exception, in accordance with the HP [Records Management Policy](#).

Violations of this global policy may lead to disciplinary action up to and including termination of employment with HP.

Any employee with knowledge or suspicion of any violations of this global policy must report these concerns to the [Ethics and Compliance Office](#) or to the Office of the General Counsel.

How to use this policy

This policy is organized as follows:

- Definitions
- General principles
- The Commercial Business Gifts, Travel and Entertainment Unrelated to an HP-sponsored Event section of this policy applies to the giving and receiving of business amenities by and between HP and commercial recipients. It also applies to business amenities received from employees of the public sector.
- The Public Sector Business Gifts, Travel and Entertainment Unrelated to an HP-sponsored Event section applies to the giving of business amenities, including travel, to public sector recipients.
- The Business Gifts, Travel and Entertainment Related to an HP-sponsored Event section of this policy applies to the giving of business amenities by HP to both commercial and public sector recipients when given in conjunction with an HP-sponsored event.
- Country-specific rules. The country-specific policies at the end of this document may have more or less restrictive dollar thresholds and take precedence over this global policy to the extent they expressly modify the terms of this global policy.

Definitions

- Business amenity: A business amenity is anything of value or something that provides a value to the recipient. Business amenities can take many forms and include any gift, meal, travel, service, prize, event ticket/pass, promotion, entertainment, reimbursement, loan, favor, or anything else of value, whether given or received by an HP employee.
- Commercial sector: Privately owned and controlled entities, which are not public sector or government entities.
- Customer: 'Customer' includes current HP customers and prospective HP customers, both individuals and entities.

- **“Event”**: Any activity where HP products and services are showcased, and the participants will receive any amenity or item of value as defined in this guidance. Event does not include ordinary business meals.
- **Gift**: Item that is provided free of charge or without payment. Examples include, but are not limited to a gift basket, wine, tobacco, tickets to a sporting event or concert, or any other item of value.
- **Meals/entertainment**: Food, beverage, or other activities intended to promote HP business. Examples include, but are not limited to breakfast, lunch, dinner, drinks, golf outings, tickets to a sporting event or concert. For any meals or entertainment provided to a non-HP source, an HP employee must be in attendance.
- **Non-HP source**: A third party outside of HP.
- **Public sector entity**: Any entity that is owned or controlled by a government. This will include any entity where a government has greater than 50% ownership, or otherwise controls the entity. You should consult the Office of the General Counsel for a determination as to whether an entity is government-owned for purposes of this policy. For countries with a central government and ownership by the government of the telecom industry, banking institutions, transportation facilities and the like, you should assume these entities are public sector.
- **Public sector recipient**: This includes:
 - Any officer or employee of a government or any department, agency, or public international organization, or any person acting in an official capacity for or on behalf of any such government or any department, agency or public international organization.
 - Members of royal families.
 - Candidates for a political office.
 - Immediate family members (parents, children, spouse, and in-laws), significant others, close friends, and business associates of a public sector employee.
 - The United States considers private K-12 educational institutions and all libraries as “public sector” entities for the purpose of the [U.S. Business Gifts, Travel and Entertainment policy](#).
 - Country-specific policies may define a public sector recipient as: public sector representative, government official, public sector official, public sector customer, public sector clients, and foreign official.
- **Vice President**: “Your vice president” means the first vice president in the **management chain above you; if you are a vice president**, “your vice president” means your manager.

General Principles

To aid in building business relationships, HP employees may give business amenities to, or receive business amenities from, HP customers, potential customers, suppliers and business partners, as described in this policy. References in this policy to specific dollar amounts should be considered “total dollar amounts” and include taxes, gratuities, and any shipping and import duties/taxes unless otherwise specified in a country-specific policy. As a reminder, HP employees may not export received business amenities using HP assets/facilities; HP is not to be considered the Exporter or Importer of Record in such cases.

Subject to the specific rules outlined further in this policy, the following business amenities are **generally permitted**:

- Pens

- Calendars
- Memo pads
- T-shirts
- Coffee mugs
- A local sporting event or cultural entertainment valued at less than \$50 USD
- Gift cards or coupons for HP products and services valued at less than \$50 USD
- Gift cards or coupons for non-HP products and services that do not compete with HP's products or services valued at less than \$25 USD
- Any travel, meals and entertainment exchanged during a competitive bid process or contract negotiation must be reasonable and directly related to the promotion, demonstration or explanation of HP's products or services. Gifts should not be provided during a competitive bid process or contract negotiation.

The following business amenities are **never permitted**:

- Cash, loans, stock or stock options
- Cash gift-cards such as, but not limited to, American Express, Visa, MasterCard
- Any gift or entertainment provided in direct exchange for a reciprocal action
- Any item or entertainment that is illegal or sexually explicit, involves gambling, or would otherwise violate our values or our Standards of Business Conduct
- Any item that might present an appearance of impropriety, conflict of interest or undue influence
- Anything that may cause embarrassment to HP or damage HP's reputation.
- Excessive, lavish, or frequent gifts or entertainment
- Any item that might violate the recipient's policies
- Gifts provided during a competitive bid process or contract negotiation
- Amenities for the immediate family members, other relatives, or significant others of public sector and commercial recipients are prohibited, except for infrequent attendance of an immediate family member or significant other at Events of nominal value where the family members or significant others of HP employees are also attending or where it would otherwise be customary for a family member or significant other to attend, and all other rules of this policy are met. For commercial recipients, infrequent attendance of an immediate family member or significant other at high-value Events may be allowed only when pre-approved by Country Legal.
- HP employees may never accept cash (or cash equivalent) in return for advocating or selling products from a partner/supplier, except commissions and customer loyalty programs as allowed under HP's [Conflicts of Interest Policy](#).
- You may not accept any combination of gifts/travel/meals/entertainment totaling more than \$500 USD per person from the same non-HP source more than once per quarter, and you should consider whether the frequency or timing of gifts totaling more than \$500 USD per person may create any appearance of impropriety. HP employees must obtain prior written approval from their vice president and the Office of the General Counsel in order to accept any combination of gifts/travel/meals/entertainment from a non-HP source totaling more than \$500 USD per person. To obtain pre-approval from the Office of the General Counsel, complete and submit the "Accepting Amenities over \$500 USD" form from the [Global Business Gifts, Travel and Entertainment \(GBGTE\) Approval Tool](#). As stated in the "Commercial Business Gifts, Travel and Entertainment Unrelated to an HP-sponsored Event" section, if you receive a gift valued at more than \$150 USD, you are required to give the gift to your manager for appropriate disposition, or otherwise follow your manager's instructions for appropriate disposition.

Record keeping: all uses of HP funds and assets must be documented in compliance with the [HP Accounting and Finance Manual](#) and HP employees must follow all expense [reimbursement rules](#) to obtain reimbursement of business amenities. You must keep accurate records of all business amenities provided to any third party, including the name of the person receiving or giving the amenity and an accurate description of the amenity provided, including the name of the service establishment in the case of meals and entertainment and the value of the amenity. Accurate receipts must be obtained for all amenities paid for by HP. All records must be retained in accordance with the [HP Records Management Policy](#). As a reminder, managers may not approve meals or entertainment in which they participated; the next level manager above the most senior participating manager must approve.

These rules apply to all business amenities, whether given directly or indirectly. HP employees may not provide any business amenity to anyone through a third party, nor may any third party pay for any business amenity on HP's behalf unless provision of such amenity would be permissible according to this policy if paid directly. In certain instances, HP employees may be contractually prohibited from providing amenities to a third party; you should confirm with the third party prior that they can receive the amenity prior to providing it. Also, HP employees may never solicit a business amenity.

Commercial Business Gifts, Travel and Entertainment Unrelated to an HP-sponsored Event

The following rules apply to the giving of business amenities by HP or its employees to commercial (private sector, non-governmental) recipients, and to the receipt of business amenities by HP or its employees from non-HP sources. If you are unsure whether you may give or accept a proposed business amenity, consult your HP attorney for guidance.

As indicated in the country-specific policies below, some countries prohibit or restrict any business amenities for commercial employees. If no country-specific rule applies (based on the country in which the commercial employee provides his or her service), the following rules apply:

Business Gifts

- **Gifts of \$50 USD or less.** You may generally give or accept gifts of \$50 USD or less. Even for such items of nominal value, you should consider whether the frequency or timing of gifts may create any appearance of impropriety, such as a frequency of more than once per quarter.
- **Gifts of \$50 - \$150 USD require approval of manager.** With your manager's prior written approval, you may occasionally give or receive a gift valued between \$50 and \$150 USD, provided that your manager agrees that the gift is in keeping with accepted business norms and will not create the appearance of undue influence. Gifts above \$50 USD should not be given to or received from the same non-HP source more than once per quarter.
- **Gifts requiring prior written approval from your vice president.** The following business amenities require prior written approval by your vice president:
 - Business gifts valued between \$150 and \$500 USD provided to a commercial recipient; however, if you receive a gift valued at more than \$150 USD, you are required to give the gift to your manager for appropriate disposition.
 - Gift cards or coupons for HP products and services valued at more than \$50 USD.
 - HP products and services valued at more than \$50 USD.
 - Trips or tickets to major sporting events, such as the Super Bowl, the World Cup, the U.S. Open, or the Olympics.
 - Gifts requiring prior written approval from your vice president should not be given to or received from the same non-HP source more than once per quarter.

- Gifts above \$500 USD to a commercial recipient: see below (Providing any combination of gifts, meals, and/or entertainment totaling more than \$500 USD).

Meals and entertainment

Business meals and entertainment should be infrequent, consistent with accepted local business practice, and for the express purpose of furthering a business relationship. A representative from each entity must be present.

- **Meals and entertainment of \$100 USD or less.** You may generally provide or receive meals and entertainment of a value up to \$100 USD per person or less. Even for such meals and entertainment of nominal value, you should consider whether the frequency or timing may create any appearance of impropriety, such as a frequency of more than once a quarter.
- **Meals and entertainment of \$100 - \$150 USD require approval of manager.** With your manager's prior written approval, you may occasionally provide or receive meals and entertainment of a value up to \$150 USD per person provided that your manager agrees that the meal/entertainment is in keeping with accepted business norms and will not create the appearance of undue influence. Meals and entertainment above \$100 should not be given to or received from the same non-HP source more than once per quarter.
- **Meals and entertainment of \$150 - \$500 USD require prior written approval from your vice president.** With your vice president's prior written approval, you may occasionally provide or receive meals and entertainment valued between \$150 and \$500 USD per person provided that your vice president agrees that the meal/entertainment is in keeping with accepted business norms and will not create the appearance of undue influence. You may not provide or receive meals or entertainment valued between \$150 and \$500 USD to the same commercial recipient more than once a quarter. Any exception request to provide or receive meals or entertainment involving a [Corporate Account](#) more than once per quarter must be sent to anticorruption@hp.com fourteen days in advance of the planned activity.
- **Providing any combination of gifts, meals and/or entertainment totaling more than \$500 USD requires prior written approval from your vice president and the Office of the General Counsel.** With prior written approval from both your vice president and the Office of the General Counsel, you may occasionally provide a combination of gifts, meals and/or entertainment totaling more than \$500 USD to a commercial recipient. To obtain pre-approval from the Office of the General Counsel, complete and submit the "Commercial (non-Public sector) Recipient Business Gifts, Travel and Entertainment Approval Request Form" from the [GBGTE Approval Tool](#). **You may not provide gifts, meals, or entertainment** totaling more than \$500 USD to the same commercial recipient more than once per quarter, and you should consider whether the frequency or timing of gifts, meals, and entertainment totaling more than \$500 USD may create any appearance of impropriety.
- **Accepting any combination of gifts, travel, meals and/or entertainment totaling more than \$500 USD from a non-HP source requires prior written approval from your vice president and the Office of the General Counsel.** With prior written approval from both your vice president and the Office of the General Counsel, you may occasionally accept a combination of gifts, travel, meals, and/or entertainment totaling more than \$500 USD from a non-HP source. To obtain pre-approval from the Office of the General Counsel, complete and submit the "Accepting Amenities over US \$500" form from the [GBGTE Approval Tool](#). **You may not accept gifts, travel, meals and/or entertainment** totaling more than \$500 USD from the same non-HP source more than once per quarter, and you should consider whether the frequency or timing of gifts, travel, meals and/or entertainment totaling more than \$500 USD may create any appearance of impropriety. If you receive any gift valued at more than \$150 USD, you are required to give the gift to your manager for appropriate disposition, or otherwise follow your manager's instructions for appropriate disposition.

Travel

You may not accept transportation, accommodation, or other travel-related amenities from any non-HP source, nor may you provide transportation, accommodation, or other travel-related amenities to representatives of HP customers, suppliers, other business partners or competitors, without prior written approval from your vice president. Additionally, you may not accept or provide such travel-related amenities more than once per quarter to the same non-HP source without prior written approval from your vice president. All travel must serve a legitimate HP business purpose.

- **Travel, gifts, meals and/or entertainment totaling more than \$500 USD per person require prior written approval from your vice president and the Office of the General Counsel.** With prior written approval from both your vice president and the Office of the General Counsel, you may occasionally provide HP-sponsored travel, gifts, meals and/or entertainment totaling more than \$500 USD per person (unrelated to an HP-sponsored Event) to a commercial recipient. To obtain pre-approval from the Office of the General Counsel, complete and submit the “Commercial (non-Public sector) Recipient Business Gifts, Travel and Entertainment Approval Request Form” from the [GBGTE Approval Tool](#). **You may not provide travel, gifts, meals and/or entertainment** totaling more than \$500 USD per person to the same commercial recipient or entity more than once a quarter, and you should consider whether the frequency or timing of travel, gifts, meals and/or entertainment totaling more than \$500 USD per person may create any appearance of impropriety.

Public Sector Business Gifts, Travel and Entertainment Unrelated to an HP-sponsored Event

This section outlines the policy that applies to the giving of business amenities to public sector recipients. Any proposed gift, meal or entertainment received from a non-HP source to HP or its employees is governed by the *Commercial Business Gifts, Travel and Entertainment Unrelated to an HP-sponsored Event* section of this policy. You must consult the U.S. Public Sector Compliance Manual for any business amenity intended to be provided to a representative of a U.S. federal, state or local government entity (including U.S. territories).

Business amenities which are permitted to be given to commercial recipients may be unacceptable and even unlawful when dealing with public sector recipients. You must be aware of, and adhere to, the relevant laws and regulations governing relations between HP and the public sector. This includes compliance with the U.S. Foreign Corrupt Practices Act (FCPA), UK Bribery Act (UKBA), other applicable laws, and the recipient entity's published code of conduct.

The FCPA and the UKBA are laws that apply to every employee of HP worldwide. These laws, and other national laws, prohibit any payment or gift to public sector recipients for the purpose of obtaining or retaining business or to otherwise gain an advantage. These laws govern the conduct of HP, its subsidiaries, joint ventures, agents, representatives and third-party relationships. A violation of these laws could result in civil and criminal penalties for HP, as well as the individuals involved in any improper conduct.

See Definitions for HP definitions of the terms **public sector entity** and **public sector recipient**

As indicated in the country-specific policies included below, some countries entirely prohibit any business amenities for public sector recipients or restrict the value significantly. If no country-specific rule applies (based on which country the public sector recipient works):

- You may give a business gift to a public sector recipient located in a country other than the U.S. if the gift is valued at \$50 USD per person or less and is not provided to the same recipient or entity more than once per quarter.
- You may give HP products and services to a public sector recipient if the product or service is valued at \$50 USD or less and is not provided to the same recipient or entity more than once per quarter.

- You may provide a meal or entertainment to a public sector recipient rendering his or her service to a country other than the U.S. if the meal or entertainment is valued at \$100 USD per person or less and is not provided to the same recipient or entity more than once per quarter.
- You may never provide cash or cash-equivalent gift cards to a public sector recipient.

You may not provide any business amenity to a public sector recipient in a country where HP does not have a registered local office or does not conduct business operations (for example, serving only specific customers) or delivers products or services solely through resellers or subcontractors unless you obtain prior written approval from both your vice president and your HP Office of the General Counsel representative. For business amenities of any value, you should consider whether the frequency or timing of gifts may create any appearance of impropriety, such as the frequency of gifts provided to the same public-sector recipient or entity more than once a quarter. In every case where you provide business amenities to or pay for travel for any third party, you must maintain accurate records of that business amenity in accordance with the [HP Records Management Policy](#). To obtain pre-approval for any HP-sponsored travel for a public sector recipient, review the Public Sector Travel section below and complete the required information in the “Public Sector Travel Approval Request Form” from the [GBGTE Approval Tool](#).

No one acting on HP's behalf may use bribes, kickbacks or other corrupt practices in conducting HP business. You are required to strictly comply with all ethical standards and applicable laws in every country in which HP does business. You may not directly or indirectly bribe or improperly influence any public sector employee in any country. You may not provide any funds to any intermediary when any of those funds may be used for corrupt payments to public sector recipients.

- **Facilitation payments.** You may not offer facilitation payments for routine government actions. For more specific guidance on the prohibition against facilitation payments, please refer to the [Facilitation Payments Policy](#).
- **Commissions and finder's fees.** Special rules apply to the payment of all commissions and finder's fees. See [Dealing with Business Intermediaries](#).
- **Cash.** Giving cash or cash equivalent gift-cards is never permitted for any reason.

Requirements for Company-sponsored Travel

Unless prohibited by a country-specific policy, HP may in limited circumstances pay for travel and accommodation by public sector recipients. This might include travel and accommodation expenses associated with the promotion of a product or performance of a contract. All approvals obtained for public sector travel expenses described in this section of this policy must be documented and obtained through use of the “Public Sector Travel Approval Request Form” from the [GBGTE Approval Tool](#).

Any proposed travel must be strictly in accordance with all applicable laws. You must consult with HP's Office of the General Counsel regarding the local laws in your country (and the country of the public sector recipient, if different) before proceeding with company sponsorship of a public sector recipient's travel.

For travel permitted by local law, the following rules apply.

- The public sector recipient making the trip should normally be selected by the public sector entity, not HP. HP must achieve the maximum transparency within the public sector agency employing the public sector recipient. An invitation must be addressed to the appropriate, highest level official.
- HP may not sponsor travel to an Event for public sector recipients if there is a pending government procurement or negotiation with the agency employing the public sector

recipient, without approval from your local HP country counsel. Such approvals should only be given in exceptional circumstances.

- HP may sponsor travel for public sector recipients to an HP site only when that site may provide services or demonstrate capabilities related to a pending government procurement activity.
- HP may not sponsor travel to an externally sponsored event for public sector recipients from an agency that is considering HP for government procurement, unless the event involves the promotion, demonstration or explanation of HP's products or services.
- HP must pay all incurred expenses directly to the service providers. For example: payments for air transportation must be made directly by HP to the air carriers, hotel accommodations must be paid directly to the hotel, and expenses for meals during the trip must be paid by HP directly to the restaurant. HP travel services should be used to the greatest extent possible to arrange and pay for these expenses.
- No per diem or stipend may be given to public sector recipients. Under no circumstances may a public sector recipient be given cash.
- All transportation, accommodation, and meals must be reasonable and not lavish.
- HP approved hotels should be used. For externally sponsored events, public sector recipients may stay in a hotel where HP has booked blocks of rooms.
- Economy class for air transportation is required and in no event should company aircraft be used for air transportation of public sector recipients.
- Generally, a public sector recipient's travel itinerary should not include any personal travel. Any request to include personal travel in conjunction with HP business travel must be pre-approved by HP Country Counsel and any costs associated with the personal travel must be paid by the recipient, not HP.
- HP may not provide any entertainment, meals, or leisure activity that is inconsistent with HP policy and guidelines.
- HP may not pay for any expenses for spouses, family, or other guests of public sector recipients.
- Sightseeing or other recreational activities during an HP sponsored trip are not allowed unless they are minimal and incidental in nature. A modest city sightseeing tour, for example, is allowed.
- Company-sponsored travel should be infrequent. HP cannot sponsor trips for the same public sector recipient more than once per quarter in the same calendar year.

For further guidance, see the [HP Meeting and Event Guidelines](#).

Procedure for Requesting Approval for Company-sponsored Public Sector Travel

HP employees must complete the "Public Sector Travel Approval Request Form" from the [GBGTE Approval Tool](#) before HP may sponsor travel for public sector recipients. The Public Sector Travel Approval Request Form must be submitted a minimum of ten days prior to the date of the travel.

Business Gifts, Travel and Entertainment Related to an HP-sponsored Event

Business amenities connected to an HP-sponsored Event are treated differently by this policy

“Event” means any activity where HP products and services are showcased, and the participants will receive any amenity or item of value as defined in this guidance. “Event” does not include ordinary business meals. Examples of “Events” include:

- HP-sponsored corporate activity
- Demonstration of HP products
- HP trade show sponsorship event
- CIO events
- Road shows
- Advisory councils
- Executive Briefing Center/Lab visits
- Technical workshop, seminars, lunch and learns
- Sales account activities and hospitality
- Sponsorships

As a reminder, you must adhere to country-specific policies; for example, the [U.S. Business Gifts, Travel and Entertainment Policy](#) prohibits meals, gifts, travel and entertainment of ANY value (over \$0 USD) to employees of any U.S. government entity, public and private K-12 entities and all libraries. Any item of value over \$0 USD (including event tickets/passes) to one of these individuals must be individually pre-screened and expressly approved on a case-by-case basis by the U.S. Public Sector Compliance Office. There are no exceptions to this requirement.

If your Event includes more than one of the circumstances below, you must follow ALL of the steps outlined for each of the applicable circumstances.

As an HP host/Event planner or lead, you must also ensure adherence to the [HP Meeting and Event Guidelines](#) which provides additional guidance on planning and seeking required approvals for Events in which employees of public sector or commercial entities are invited.

“Donation” is defined as grants and donations that comply with [HP’s Global Contributions Policy](#).

When	What	How
Events with U.S. Public Sector invitees: Events where an employee of the U.S. federal government, U.S. state/local government, or public higher education institution, or any private or public K-12 educational institution, and all libraries may be in invited or participate.	MUST be pre-screened by the U.S. Public Sector Compliance Office	The HP host/Event planner or lead must complete the pre-screening form at least 2 weeks prior to invitations being sent and await review and directions from the U.S. Public Sector Compliance Office.
Public sector Events not involving U.S. public sector participants, >\$100: Events where employees of a public sector entity outside the U.S. (including state-owned enterprises) may be in attendance or invited and items of value will be provided (meals, gifts, entertainment, travel, free attendance that would otherwise have a value) that exceeds \$100 USD.	Invitation disclaimer language Non-U.S. public sector invitees must identify themselves and acknowledge value of gifts.	Must use this language on invitations or registration websites and a copy retained by the HP Event organizer/host or sponsor per HP Corporate Record Retention Guidelines . Registration websites (or via email/ public sector supplemental questionnaire should request public sector invitees outside the U.S. to identify themselves and acknowledge they may accept each of the items of value to be provided. A copy of the language on the website, the information submitted on the registration site and/or completed

	A record of attendees, the meeting agenda and items of value provided must be documented.	<p>public sector supplemental questionnaire(s) must be retained per HP Corporate Record Retention Guidelines.</p> <p>The HP host/Event planner or lead must ensure that a detailed list of attendees (name, email, company/gov't entity, and position), the Event agenda (including business and non-business activities) and the list of items of value offered are tracked and retained per HP Corporate Record Retention Guidelines.</p>
Commercial only Events >\$500: Events with commercial invitees only where cumulative value of gifts, meals and entertainment per attendee >\$500 USD.	A record of attendees and items of value provided must be documented.	The HP host/Event planner or lead must ensure that a detailed list of attendees (name, email, company name, and position) be retained per HP Corporate Record Retention Guidelines .
Raffles: An item will be raffled off to attendees at an Event.	<p>Must use the Raffle Acceptance Form:</p> <ul style="list-style-type: none"> Non-U.S. public sector recipient wins a raffle item valued at >\$50 USD must complete and sign the form. Commercial recipient wins a raffle item valued at >\$500 USD must complete and sign the form. <p>Any item valued at \$1,000 USD or above must be pre-approved by the applicable regional Director of Ethics & Compliance, or the Corporate Compliance Office.</p> <p>Contact: anticorruption@hp.com</p>	HP Host/Event planner or lead must retain the signed Raffle Acceptance form as required by HP Corporate Record Retention Guidelines . If the value of the item being raffled is \$1,000 USD or higher, you must also obtain prior written approval from HP's Global Anti-corruption Office .
Travel for non-U.S. public sector recipients: All travel for public sector recipients outside the U.S.	GBGTE Approval Tool	Request form must be submitted at least 2 weeks prior to the date in which the public sector travel will be provided. The recipient cannot be invited nor can travel be provided

		unless the request is approved through the GBGTE Approval Tool.
Grants/donations for non-U.S. public sector entities: HP grants and donations to public sector entities outside the U.S.	Grants/donations process and requirements and Anti-corruption checklist	HP employee must complete the anti-corruption checklist and assure the donation is aligned with HP's Global Contributions Policy , GBGTE policy , Conflicts of Interest Policy , and the Accounting and Finance Manual (AFM) .
Grants/donations for U.S. public sector entities: HP grants and donations to U.S. public sector entities.	Grants/donations process and requirements and MUST be pre-screened by U.S. the U.S. Public Sector Compliance Office	Must complete the process and pre-screen.

Country-specific Policies Business Gifts, Travel and Entertainment

Several countries have adopted country-specific policies related to business amenities. Contact your HP attorney for guidance, if necessary.

[Austria](#)
[Australia and New Zealand](#)
[Belgium & Luxembourg](#)
[Brazil](#)
[Central America Region and Caribbean \(excluding Puerto Rico\)](#)
[China](#)
[CIS \(Azerbaijan, Belarus, Kazakhstan, Ukraine, Uzbekistan, Georgia, Armenia, Tajikistan\)](#)

[Turkmenistan](#),
[Kyrgyzstan\)](#)
[Denmark](#)
[Estonia](#)
[Finland](#)
[France](#)
[Germany](#)
[Hong Kong](#)
[Ireland](#)
[Israel](#)
[Italy](#)
[Japan](#)
[Korea](#)
[Latvia](#)
[Netherlands](#)
[Norway](#)

[Philippines](#)
[Poland](#)
[Republic of Turkey](#)
[Russia](#)
[SEE Region](#)
[Singapore](#)
[Spain](#)
[Sweden](#)
[Switzerland](#)
[Taiwan](#)
[United Kingdom](#)
[United States](#)
[Venezuela](#)
[Vietnam](#)

Austria Business Gifts, Travel and Entertainment Policy

Pursuant to the Austrian Criminal Code ("Strafgesetzbuch") the active as well as the passive bribery of Austrian or foreign public officials, including employees and officers of state-owned enterprises and enterprises who are (partially) directly or indirectly controlled by a regional administrative body, ("Public Sector Bribery") as well as of employees or representatives of private companies ("Private Sector Bribery") constitutes a crime carrying a sentence of up to 10 years in prison. Bribery means demanding, offering or promising a benefit to obtain an action or omission contrary to the person's duties or for the unlawful performance or omission

of a legal act (negative influence). It is only permitted to provide locally customary gifts of small value which shall not be linked to any (future) action or omission of a person and shall not be intended to negatively influence a person in the fulfillment of his or her professional duties.

This said, the following thresholds for gifts, meals, entertainment and travel may be seen as locally customary:

- (i) Public Sector: Gifts, meals and/or entertainment – as low as possible, the general HP standards as outlined in this policy apply. Exception: You must not provide funding for third party travel.
- (ii) Private Sector: Gifts, meals entertainment and/or travel – as low as possible, the general HP standards as outlined in this policy apply.

You should always consider whether the frequency or the timing of the gift, meal and/or entertainment may create an appearance of impropriety, such as a frequency of more than once per quarter.

If you are aware that the recipient's own internal regulations provide for lower thresholds you must comply with these.

Australia and New Zealand Public Sector Business Gifts, Travel and Entertainment Policy

The HP [Public Sector Business Gifts, Travel and Entertainment Policy](#) applies in Australia and New Zealand.

Note that the internal policies that apply to public sector officials vary widely. For example, some public sector officials cannot accept entertainment of any value. Where the internal public sector policy provides for no entertainment or entertainment of a lesser value than that allowed under HP's policy, the internal public sector policy will prevail. To avoid embarrassment, always check with your public sector guest as to what is acceptable.

Belgium & Luxembourg Business Gifts, Travel and Entertainment Policy

The HP [Public Sector Business Gifts, Travel and Entertainment Policy](#) applies in Belgium and Luxembourg. The maximum limit for Public Sector Gifts is \$50 USD per person and the limit for Public Sector Meals/Entertainment is \$100 USD per person.

Keeping this in mind, following thresholds for meals, entertainment and gifts may be seen as customary:

- (i) Public Sector – as low as possible, but in no case exceeding \$100 USD (meals/entertainment), whereas between \$50 and \$100 USD written manager approval is necessary. For gifts, the maximum limit is \$50 USD;
- (ii) Private Sector – as low as possible, whereas no approval is required up to \$50 USD; written Manager approval is required between \$50 and \$100 USD; written VP approval is required between \$100 and \$500 USD; written VP approval and Country Legal approval is required over \$500 USD utilizing the [Global Business Gifts, Travel and Entertainment Approval Tool](#).

Please be reminded that you should always carefully consider the invitees and circumstances of the planned meal/entertainment in advance and refrain from inviting representatives of a Public Sector customer if you are aware of an up-coming or pending tender or procurement activity with that Public Sector customer.

Please remember also to take into account and respect the internal policies of the Public Sector entity in question.

Brazil Public Sector Business Gifts, Travel and Entertainment Policy

Public Sector Business Gifts, Travel and Entertainment Unrelated to an HP-sponsored Event

In addition to the restrictions contained in the HP [Public Sector Business Gifts, Travel and Entertainment Policy](#), a public sector recipient in Brazil needs to observe local restrictions to receive anything of value – including gifts, meals, entertainment, travel or other benefits.

You must not give, offer or promise anything of value (including gifts, meals, entertainment, travel or other benefits) to a Brazilian public sector recipient unless the value does not exceed \$50 USD (or R\$ 100) per year.

To obtain pre-approval for any HP-sponsored travel for a public sector recipient, review the Public Sector Travel section below and complete the required information in the. “Public Sector Travel Approval Request Form” from the [GBGTE Approval Tool](#).

You must not give, promise or offer to public sector entity or recipient anything of value on the grounds of its/his role or expecting that such entity or recipient does something that is part of their role. **These are considered crimes.**

You must not give, promise or offer to public sector recipient with whom you are negotiating a contract anything of value.

Brazilian Public Sector Entities include state-owned companies, semipublic companies and regulatory agencies.

Business Gifts, Travel and Entertainment Related to an HP-sponsored Event

In addition to the restrictions contained in the HP [Public Sector Business Gifts, Travel and Entertainment Policy](#):

Definitions and Responsibilities:

(i) ***Public sector events not involving U.S. public sector participants, >\$50 USD (or R\$100):*** Events where employees of a Brazilian public sector entity may be in attendance or invited and items of value will be provided (meals, gifts, entertainment, travel, free attendance that would otherwise have a value) that exceeds \$50 USD (or R\$100)

(ii) ***Raffles:*** Events where employees of a Brazilian public sector entity may be in attendance or invited and items of value will be raffled

The [Raffle Acceptance Form](#) must be completed and signed when a Brazilian public sector recipient wins a raffle item of any value.

Central America Region & and Caribbean (excluding Puerto Rico) Public Sector Business Gifts, Travel and Entertainment Policy

In Central America and Caribbean Region (excluding Puerto Rico which is part of the U.S. for purposes of this policy) the maximum limit of Public Sector Gifts/Meals/Entertainment is \$50 USD per person. Prior manager approval is not required when adhering to the stated limit.

Please be reminded that you should always carefully consider the invitees and circumstances of the planned gift/meal/entertainment in advance and refrain from inviting representatives of a Public Sector customer if you are aware of an upcoming or pending tender or procurement activity with that Public Sector customer.

China Public Sector Business Gifts, Travel and Entertainment Policy

No pre-approval is required provided that the general rules in HP [Public Sector Business Gifts, Travel and Entertainment Policy](#) are followed for the amount below:

Gifts	Meals	Travel (and meals and entertainment as part of a conference or other event)
\$50 USD	\$100 USD	Pre-approval always required: See below and China Public Sector Business, Gifts, Travel and Entertainment Policy

Whenever there is a proposal to organize an activity resulting in giving anything of value of more than the limits set above per person per occasion and for payment of any travel expenses, the affected business unit controller must first review the activity against the 13 points checklist. All boxes in the checklist must be checked in the affirmative. Thereafter, the proposal must be passed to the China Office of the General Counsel (for H3C the proposal must be passed to the H3C Office of the General Counsel) for review and clearance. At least ten business days must be allowed for the Office of the General Counsel to approve before the proposed activity may proceed.

This policy applies to seminars and meetings; training; travel, both domestic and overseas; meals; accommodations; entertainment including sightseeing tours; teambuilding activities; gifts and souvenirs; luck draws; and other similar activities. This policy does not apply to events or gifts with a value of less than \$50 USD per person per occasion.

See the [China Public Sector Business Gifts, Travel and Entertainment Policy](#) in its entirety.

CIS (Azerbaijan, Belarus, Kazakhstan, Ukraine, Uzbekistan, Georgia, Armenia, Tajikistan, Turkmenistan, Kyrgyzstan) Public Sector Business Gifts, Travel and Entertainment Policy

See the [Russia and CIS](#) section.

Denmark Business Gifts, Travel and Entertainment Policy

In Denmark the maximum limit of commercial and Public Sector Meals/Entertainment is **\$150 USD per person** (due to higher cost of living). Prior manager approval is not required when adhering to the said limit.

Please be reminded that you should always carefully consider the invitees and circumstances of the planned meal/entertainment in advance and refrain from inviting representatives of a customer if you are aware of an up-coming or pending tender or procurement activity with that customer. Regarding public sector customer please remember also to take into account and respect the internal representation policies of the public sector entity in question.

Estonia Public Sector Business Gifts, Travel and Entertainment Policy

It is prohibited to provide any business amenities to government officials, their close relatives or close relatives by marriage, regardless of the value of such amenities, if the acceptance of such amenities may directly or indirectly influence the impartial performance of the duties of employment or service of the government official.

The term **government official** means a state or local government official who has an official position, or a non-staff public servant performing the duties of the official. Government officials also include management and supervisory board members and employees of a private legal entity if such entity is primarily financed through public means. Government officials include employees of government-owned entities and public international organizations.

Before providing any business amenities, HP employees must refer to the full list of officials stipulated in Estonian laws (such as the *Anti-Corruption Act*, the *Public Procurement Act*, and the *Public Service Act*) to determine if a person falls under the term “government official” under Estonian laws. Even if an individual does not qualify as a “government official” under

local laws, HP employees must also ensure that the individual does not qualify as a public sector employee or a government official or employee as defined by the HP [Public Sector Business Gifts, Travel and Entertainment Policy](#).

Note that the local laws that apply to government officials vary widely. Where the local law provides for no entertainment or entertainment of a lesser value than that allowed under HP's policy, the local law will prevail. Where HP's policy is more restrictive than that allowed under local law, HP's policy will prevail.

Finland Business Gifts, Travel and Entertainment Policy

In Finland the maximum limit of Commercial Sector and Public Sector Meals/Entertainment is **\$150 USD per person** (due to higher cost of living). Prior manager approval is not required when adhering to this limit.

With your BU Vice President's prior knowledge and prior written approval, you may occasionally provide to a Commercial customer or receive from a Commercial customer meals and entertainment valued at between \$150 and \$500 USD per person provided that your Vice President agrees that the meal/entertainment is in keeping with accepted business norms and will not create the appearance of undue influence. You may not provide or receive meals or entertainment valued between \$150 and \$500 USD to the same Commercial customer representative or entity more than once a quarter. **The above mentioned exception procedure for costs higher than \$150 is not applicable to Public Sector customers.**

Please be reminded that you should always carefully consider the invitees and circumstances of the planned meal/entertainment in advance and refrain from inviting representatives of a customer if you are aware of an up-coming or pending tender or procurement activity with that customer. Please remember also to take into account and respect the internal representation policies of the customer under consideration.

France Business Gifts, Travel and Entertainment Policy

In France, Meals/Entertainment for commercial and Public Sector customers up to \$100 USD (per person) does not require prior manager approval.

You should still keep in mind whether meals and entertainment even below this amount are adequate and would not cause the risk to be considered (illegal) influencing of a commercial or Public Sector customer, especially when you are in current negotiations with this customer concerning a tender and/or a tender is up for decision. Please remember also to take into account and respect the internal representation policies of the customer in question.

Germany Public Sector Business Gifts, Travel and Entertainment Policy

In addition to following the rules in the HP [Public Sector Business Gifts, Travel and Entertainment Policy](#), you may not give an employee of a German Public Entity anything of value—including gifts, meals, entertainment, event tickets/passes or travel—unless the Public Entity employee pays its fair market value or the acceptance of the amenity is approved in writing by the administrative head of the respective German Public Entity. A confirmation from the Public Entity employee himself/herself will not be sufficient. It makes no difference whether these gifts are provided within an HP-sponsored Event as there are no exceptions to this requirement. The regulations of the GBGTEP regarding "Public sector events not involving U.S. public sector participants, >\$100:" shall apply even the value does not exceed USD 100". German Public Entities include employees of government-owned entities such as public banks or public hospitals.

Hong Kong Public Sector Business Gifts, Travel and Entertainment Policy

The HP [Public Sector Business Gifts, Travel and Entertainment Policy](#) applies in Hong Kong, except that the dollar threshold for any public sector business gift is \$32 USD per person and

the threshold for any public sector meal/entertainment is \$100 USD per person. Contact the Hong Kong Office of the General Counsel for further clarification.

Ireland Public Sector Business Gifts, Travel and Entertainment Policy

In addition to the restrictions provided for in the HP Global Business Gifts, Travel and Entertainment Policy, be sensitive to the fact that public sector employees are under tight restrictions regarding the receipt of gifts or hospitality. Local government members in Ireland operate under a detailed code of conduct. When providing business amenities to public sector clients, always ensure that the provision of the business amenity is cleared with the relevant public sector customer. You should ensure that you have written confirmation from an executive or senior line manager within the public sector client confirming that they approve that the relevant public sector employee can accept the business amenity and that such employees are not prohibited by their own internal policies from accepting such business amenities. Also please note that any financial institution that is majority-owned by the government will be considered a public sector entity and fall within this policy.

You must never provide a business amenity to a local government official with whom you are potentially entering into a contractual arrangement. Commercial agents and subcontractors employed by HP in Ireland are considered to be acting on behalf of HP. You are required to ensure that any agents or subcontractors you are responsible to engage or oversee have been provided with a copy of this policy and have agreed to abide by its terms in all their dealings on behalf of HP.

Israel Public Sector Business Gifts, Travel and Entertainment Policy

You may not give a public sector representative (including consultants, sub-contractors and so forth working for or on behalf of a public sector client) a gift that is valued at more than \$25 USD. Any and all exceptions—up to a maximum value of \$50 USD—require, at a minimum, advance written approval by HP Israel country counsel. A value of \$50 USD may not be exceeded for gifts under any circumstance.

You may not supply a public sector representative (including consultants, sub-contractors etc. working for or on behalf of a public sector client) with meals/entertainment valued at more than \$25 USD. Any and all exceptions—up to a maximum value of 300 NIS (and in no circumstance exceeding an equivalent of \$100 USD)—require, at a minimum, advance written approval by HP Israel country counsel. A value of 300 NIS cannot be exceeded for meals/entertainment under any circumstance.

You may not give a public sector representative (including consultants, sub-contractors and so forth working for or on behalf of a public sector client) anything of value if it is for an action that is within his or her duty as a public sector representative. The giving of anything of value under such circumstances constitutes bribery under Israeli law.

Under Israeli law, an employee of a "corporation supplying services to the general public" is also regarded as a public official for the purposes of the Bribery section of the Israeli Criminal law. As such, the definition of a public official may include employees of banking institutions, telecommunications providers, transportation companies, healthcare providers, and other corporate entities engaged in providing services to the general public.

Rules governing gifts, travel and meals/entertainment for commercial sector clients are according to HP's GBGTEP policy.

Italy Business Gifts, Travel and Entertainment Policy

In Italy the maximum limit of commercial and Public Sector meals/entertainment is \$150 USD per person.

No prior approval is required for meals/entertainment up to \$100 USD per person. However, prior VP approval is required for meals between \$100 and \$150 USD.

Please be reminded that you should always carefully consider the invitees and circumstances of the planned meal/entertainment in advance and refrain from inviting representatives of a Public Sector customer if you are aware of an up-coming or pending tender or procurement activity with that Public Sector customer.

Please remember also to take into account and respect the internal policies of the Public Sector entity in question.

Japan Business Gifts, Travel and Entertainment Policy

Public Sector

The HP [Public Sector Business Gifts, Travel and Entertainment Policy](#) applies in Japan, except that due to Japan law, you must obtain pre-approval from the Japan Office of the General Counsel for all gifts, meals, or entertainment (hereinafter collectively referred to as 'amenity') to be given or provided to a foreign official or government official, and must identify the following:

- The reason for giving or providing the amenity
- The market price of the amenity (which should be less than \$50 USD for one time)
- Frequency of giving or providing the amenity to the specific foreign or governmental official in the fiscal year of foreign official or government official
- Aggregated amount of the amenity to the specific foreign or governmental official in the fiscal year of the foreign official or government official

Commercial (Private Sector/Non-Governmental)

Meals and entertainment. Business meals and entertainment should be infrequent, consistent with accepted local business practice, and for the express purpose of furthering a business relationship. Whether you are providing or receiving a business meal or entertainment, it should not be extravagant in nature and a representative from each company must be present.

- **Meals and entertainment of nominal value.** You may generally provide to a commercial customer or receive meals and entertainment of a value up to \$100 USD per person or less. Even for such meals/entertainment of nominal value, you should consider whether the frequency or timing may create any appearance of impropriety, such as a frequency of more than once a quarter.
- **Meals and entertainment above nominal value require approval of manager.** With your manager's prior knowledge and prior written approval, you may occasionally provide or receive meals and entertainment to a commercial representative or entity of a value up to \$150 USD per person provided that your manager agrees that the meal/entertainment is in keeping with accepted business norms and will not create the appearance of undue influence.
- **Meals and entertainment requiring prior written approval from your director or vice president.**
 - **\$150 to \$250 USD.** With your Director's (must be direct report to VP) prior knowledge and prior written approval, you may occasionally provide to a commercial customer or receive from a commercial customer meals and entertainment valued between \$150 and \$250 USD per person provided that your Director agrees that the meal/entertainment is in keeping with accepted business norms and will not create the appearance of undue influence. You may not provide or receive meals or entertainment valued between \$150 and \$250 USD to the same customer representative or entity more than once a quarter. Directors cannot approve meals or entertainment in which they

participated; the VP above the most senior participating manager must approve.

- **\$250 to \$500 USD.** With your vice president's prior knowledge and prior written approval, you may occasionally provide to a commercial customer or receive from a commercial customer meals and entertainment valued between \$250 and \$500 USD per person provided that your VP agrees that the meal/entertainment is in keeping with accepted business norms and will not create the appearance of undue influence. You may not provide or receive meals or entertainment valued between \$250 and \$500 USD to the same customer representative or entity more than once a quarter.
- **Meals and entertainment totaling more than \$500 USD require prior written approval from your vice president and the Office of the General Counsel.** With prior knowledge and written approval from both your vice president and the Office of the General Counsel, you may occasionally provide gifts, meals and entertainment totaling more than \$500 USD to a commercial customer. To obtain pre-approval from the Office of the General Counsel, complete and submit the "Commercial (non-Public sector) Recipient Business Gifts, Travel and Entertainment Approval Request Form" from the [Global Business Gifts, Travel and Entertainment Approval Tool](#). **You may not provide gifts, meals or entertainment** totaling more than \$500 USD to the same customer representative or entity more than once a quarter, and you should consider whether the frequency or timing of gifts totaling more than \$500 USD may create any appearance of impropriety.

Korea Public Sector Business Gifts, Travel and Entertainment Policy

This policy applies to business amenities that HP may provide to or organize for any foreign or government official, which includes any officer or employee of the Korean government, department, or agency; a political party; a government-owned or controlled organization; a government-related organization; or a public international organization. Information Technology managers and employees and procurement officers employed by any of these entities are also considered foreign or government officials for the purpose of this policy.

The Corruption Prevention Act (CPA) defines Korean government organizations to include the following:

- An administrative body under the National Government Organization Act and an executive body and The Local Assembly of a local government under the Local Government Act
- A superintendent of educational affairs, Office of Education and School Board under the Local Government Education Act
- The National Assembly under the National Assembly Act, the courts under the Court Organization Act, the Constitution Court under the Constitution Court Act, the Election Management Committee under the Election Management Committee Act, and the Board of Audit and Inspection under the Board of Audit and Inspection Act
- Government-related organization under the Public Servant's Ethics Article 3, Section 1 and Subsection 10

The *Enforcement Ordinance of Public Servants Ethics* lists the following government-related organizations, among others:

- Government-invested organization
- Bank of Korea
- Local public organization

- Government organizations or organizations that receive local government subsidy or perform government business upon entrustment by the government
- Organizations that require the approval of the chief of local government or central administrative body when appointing an executive, and organizations for which the chief of local government or central administrative body appoints the executive

You should consult the HP Korea (HPK) Office of the General Counsel for a determination as to whether an entity is government-owned or controlled, or a government-related organization, for purposes of this policy.

1. Application

Meals or gifts of KRW 30 000 or less (and in no circumstance exceeding an equivalent of \$100 USD for meals/entertainment or \$50 USD for gifts), based on each government or government-related organization policy or Code of Conduct, per person per occasion generally are not prohibited under this policy. However, even for such items, you should consider whether the frequency or timing of events or gifts may create an appearance of impropriety. Even if allowed under Korean law or government policy or Code of Conduct, giving cash (including cash equivalents such as a gift card or voucher) is NEVER permitted, including “Congratulatory and Condolatory” money.

2. Planning and Event Approval

Whenever there is a proposal to organize an event, the affected BU Controller must first review the agenda against the 11 point checklist included here. Answers to the checklist must all be in the affirmative. The Event Approval request includes salient information like agenda, cost estimate, and list of participants to be invited, together with a copy of the checklist with all affirmative answers and duly signed by the affected BU Manager and BU Controller. The request must be transmitted to the HPK Office of the General Counsel for final review and approval. No event should take place without advance written approval from HPK Office of the General Counsel.

3. Checklist

- Purpose—Are we satisfied that the purpose of the event is legitimate? In addition to responding “yes” or “no,” please answer the following questions:
 - Why do we invite these officials to the event?
 - Is this event related to a specific reference account or deal, or is it just a business or IT Forum for them to learn more about HP’s business, technology or product?
 - Does HP have any ongoing business project that is under the supervision or control of the recipient of the gift or invitation?
- Event—Is the length of the event reasonable, considering the purpose of the event?
- Additional activities (including teamwork building)—Are any additional activities reasonable, not extravagant, minimal, and relevant to the purpose of the meeting?
- Venue—Is the venue reasonable?
- List of participants—Is the list of participants reasonable, considering the purpose of the event?
- Invitation—Is the invitation sent to the government bodies or organizations directly, and not to individual officials or officers?
- Cost—Is the cost of the event reasonable and not extravagant, considering the purpose of the event? Will HP pay the expense directly to vendors or suppliers?
- Gifts—Is the value of any gifts reasonable? Is the value of any gift less than KRW 30 000 per person per occasion? Is the cumulative value of any such gifts given to any particular individual during the last 12 months reasonable?

- i. HP internal approval—Have all HP internal approvals been obtained in advance of the event?
- j. HP's SBC headline test—Does the event pass the HP SBC headline test?
- k. Restricted Parties List (RPL)—Have you verified that no attendees are on the RPL?

Latvia Public Sector Business Gifts, Travel and Entertainment Policy

The HP [Public Sector Business Gifts, Travel and Entertainment Policy](#) applies in Latvia as follows. The limits in the HP Public Sector Business Gifts, Travel and Entertainment rules apply to all persons who are public sector officials under such rules, but are not Latvian Government Officials. The following stricter rules apply to Latvian Government Officials. Government Officials in the Republic of Latvia ("Latvian Government Officials") must not accept any gifts that are given to them (directly or indirectly) relating to their duties as Latvian Government Officials. Therefore, no such gifts should be offered. However, a gift might be offered and accepted by a Latvian Government Official if given outside his or her duties provided that, within a period of two years prior to acceptance of the gift, the Latvian Government Official has not prepared or issued an administrative act; performed supervision, control, inquiry or punitive functions; entered into contracts, or performed other activities related to HP and associated with the fulfillment of the duties of office.

It is important to note that after receipt of such a gift, the Latvian Government Official will not be allowed to make any decision regarding HP during the two years following the day the gift is accepted.

The following items or services are not considered gifts under Latvian law, but are considered gifts or amenities under HP's policy:

- Flowers
- Souvenirs, books, or various marketing items
- Awards, prizes or honors that are provided for in external regulatory enactments
- Any benefit and guarantee that the public official is ensured by regulatory enactments of the State or local government authority for which the relevant person fulfils the duties of office
- Services and various types of rebates that are publicly available and are offered by commercial companies, individual merchants, farms, and fishery enterprises

HP employees must adhere to the limits established by HP's policy even if internal Latvian laws or policies provide otherwise. As such, even if a gift or amenity falls within the categories described immediately above, the amount of the item must be valued at \$50 USD per person or less.

In addition to persons who are covered by the general terms **public sector official or employee** and **government official or employee**, the following persons are considered **Latvian Government Officials**:

1. Persons who, in the performance of the duties of office in the State or local government authorities and in accordance with regulatory enactments, have the right to issue administrative acts; to perform supervision, control, inquiry or punitive functions related to persons who are not under their direct or indirect control; or to deal with the property of the State or local government, including financial resources.
2. Persons who, in fulfilling the duties of office in State security authorities, perform at least one of the following activities:
 - Intelligence
 - Counter-intelligence
 - Investigatory operations
 - The processing, analysis or protection of information acquired through intelligence, counter-intelligence or investigatory operations
3. Persons who, in fulfilling the duties of office in institutions involved in the management of European Union or foreign financial aid, perform at least one of the following activities:

- Fulfill supervisory, control or punishment functions related to persons who are not directly or indirectly subordinate to them
 - Make decisions regarding the submitted project or project application
 - Make decisions that affect the use of granted financial aid
4. Persons who hold the offices of chairperson of the board of a port, port manager, or member of the board of a port. Persons employed in private ports shall be considered to be public officials only if they meet the requirements in paragraph 5.
 5. Persons who perform duties of office external to the State or local government authorities shall also be considered Latvian Government Officials if, in accordance with regulatory enactments, the State or local government has permanently or temporary delegated to them any of the functions identified in paragraph 1, above.

Before providing any business amenities, HP employees must refer to the full list of officials and criteria stipulated in the law *On Prevention of Conflict of Interest in Activities of Public Officials* (available in Latvian at <http://www.likumi.lv/doc.php?id=61913>) to determine if a person falls under the term “Latvian Government Official.” HP employees must also ensure that the individual does not qualify as a public sector employee or a government official or employee as defined by the HP [Public Sector Business Gifts, Travel and Entertainment Policy](#).

Netherlands, Business Gifts, Travel and Entertainment Policy

The HP [Public Sector Business Gifts, Travel and Entertainment Policy](#) applies in The Netherlands.

Keeping this in mind, following thresholds for meals, entertainment and gifts may be seen as customary:

- (i) Public Sector – as low as possible, but in no case exceeding \$100 USD (meals/entertainment). For gifts, the maximum limit is \$50 USD.
Please note that all Public Sector travel must be approved via the [Global Business Gifts, Travel and Entertainment Approval Tool](#).
- (ii) Private Sector – as low as possible, whereas for gifts no approval is required up to \$50 USD; written Manager approval is required between \$50 and \$150 USD; written VP approval is required between \$150 and \$500 USD; written VP approval and Country Legal approval is required over \$500 USD utilizing the [Global Business Gifts, Travel and Entertainment Approval Tool](#).

For meals/entertainment up to \$100 USD no approval is required, written Manager approval is required between \$100 and \$150 USD, written VP approval is required between \$150 and \$500 USD; written VP approval and Country Legal approval is required over \$500 USD utilizing the [Global Business Gifts, Travel and Entertainment Approval Tool](#). For all Private Sector travel written VP approval is required and for travel in conjunction with gifts/meals/entertainment totaling more than \$500 USD per person, Legal approval is required as well.

Please be reminded that you should always carefully consider the invitees and circumstances of the planned meal/entertainment in advance and refrain from inviting representatives of a Public Sector customer if you are aware of an up-coming or pending tender or procurement activity with that Public Sector customer. Please remember also to take into account and respect the internal policies of the Public Sector entity in question..

New Zealand

(see [Australia and New Zealand](#))

Norway Business Gifts, Travel and Entertainment Policy

In Norway the maximum limit of commercial meals/entertainment is \$150 USD per person. Prior manager approval is not required when adhering to the said limit.

The HP [Public Sector Business Gifts, Travel and Entertainment Policy](#) applies in Norway in its entirety. Please be reminded that you should always carefully consider the invitees and circumstances of the planned meal/entertainment in advance and refrain from inviting representatives of a Public Sector customer if you are aware of an upcoming or pending tender or procurement activity with that Public Sector customer. Please remember also to take into account and respect the internal representation policies of the Public sector entity in question.

Philippines Public Sector Business Gifts, Travel and Entertainment Policy

The general rules in the [Public Sector Business Gifts, Travel and Entertainment](#) section of the Policy apply except that the maximum amount for Public Sector Meals and Entertainment is \$50 USD.

Poland Public Sector Business Gifts, Travel and Entertainment Policy

In addition to the restrictions provided for in the [Public Sector Business Gifts, Travel and Entertainment Policy](#), under the laws of Poland it is also forbidden to grant benefits of a personal nature to any person performing a public function for the purpose of obtaining or retaining business or to otherwise gain a business advantage. Polish law penalizes not only financial but also personal benefits given to a governmental official when provided for the purpose of obtaining or retaining business or to otherwise gain a business advantage. Examples of what constitutes a personal benefit include, but are not limited to, offering membership in a certain organization or facilitating a personal introduction with a particular person.

SEE Region Public Sector Business Gifts, Travel and Entertainment Policy

The HP [Public Sector Business Gifts, Travel and Entertainment Policy](#) applies in the South East Europe (SEE) Region, except that the definition of **government owned** also includes companies in which the government owns less than 20% of the shares.

In addition, in accordance with local anti-corruption laws, a government-owned entity is broadly defined to include public institutions such as ministries, national banks, national museums, political parties, official trade unions, employer organizations, and trading companies in which the state or an authority of the local public administration is a shareholder, regardless of the number of shares held.

SEE currently consists of the following countries: Albania, Bosnia and Herzegovina, Bulgaria, Croatia, Kosovo, Macedonia, Malta, Moldova, Montenegro, Hungary, Romania, Serbia, and Slovenia.

Singapore Public Sector Business Gifts, Travel and Entertainment Policy

“For the purposes of this policy, the term “public sector” or “government owned” in the context of Singapore shall be construed to refer only to:

- (a) The ministries, statutory boards, organs of state and agencies set out in the Singapore Government portal;
- (b) The Government of Singapore Investment Corporation (GIC);
- (c) Temasek Holdings; and

All Singapore incorporated private and public listed companies in which GIC or Temasek Holdings maintains a greater than 50% ownership.

Republic of Turkey Business Gifts, Travel and Entertainment Policy

Public Sector

Identification of Civil Servants:

“Civil Servants” for the purposes of this policy shall include:

Civil Servants that are considered as government officials under the local law (“Public Sector”) are defined as all personnel employed at departments included in the general state budget, contributed budget administrations, state economic enterprises, working capital establishments, local administrations and unions thereof, all public establishments and institutions founded under the names of committees, upper committees, institutions, institutes, enterprises, organizations, funds and similar possessing public entities, the chairmen and members of the management and audit committees, boards, supreme boards and all personnel employed in other public legal entities who is involved in the operations of public activities, who are assigned the task of performing fundamental and permanent public services executed in line with the general administrative principles of the State for a definite or an indefinite term, either by way of election or nomination or any other way.

There is more restrictive local legislation applicable to Public Sector (Civil Servants) as described below.

- Gifts to Civil Servants:
The amount of a gift to a Civil Servant cannot exceed \$50 USD in Turkish Lira equivalent on the date of purchase and the type provided such gift is a “token gift” of nature. The gift shall not be provided to a Civil Servant in return for any action or inaction in favor of the grantor of such gift, otherwise this may be viewed as a bribe.
- Meals/Entertainment of Civil Servants:
The amount of a meal/entertainment to a Civil Servant cannot exceed \$50 USD in Turkish Liras equivalent on the date of the meal/entertainment is provided. The meal/entertainment shall not be provided to a Civil Servant in return for any action or inaction in favor of the grantor of such meal/entertainment, otherwise this may be viewed as a bribe. All event invitations should be addressed to the department/institution the Civil Servant is working and not to the Civil Servant personally.
- Travel of Civil Servants:
Sponsorship of Civil Servants travel is not allowed.

Commercial (Private Sector/Non-Governmental)

The general provisions of Global Business Gifts, Travel and Entertainment Policy will apply in its entirety. However the ethic codes of the private companies to whom the gifts are addressed should be reviewed before an offer is made (especially in regulated sectors such as banking, insurance, telecom, etc.) since some private companies have ethic rules similar to those in the Public Sector.

Russia and CIS Business Gifts, Travel and Entertainment Policy

Russia

Identification of Government Officials:

“Government Official” for the purposes of this policy shall include:

- **State Officers that are considered as government officials under the local law** (“Public sector”) defined as representatives of any federal, state, regional, local or other

government and departments, agencies, and instrumentalities thereof (administration, legislature, enforcement, supervision/control, military, state security, judicial, and so forth), which are appointed to serve in any state body or organization of any state, regional, or municipal level and are paid from the state, regional, or municipal budget.

- Employees of government-owned entities and public international organizations that **are not considered to be government officials (state servants) under the Russian law** ("Quasi-Public sector")

There is more restrictive local legislation applicable to Public sector (State Officers) described below, whereas to the Quasi Public Sector, the general provisions of *Global Business Gifts, Travel and Entertainment Policy* will apply in its entirety.

Gifts to Public Sector and Quasi Public Sector representatives:

The amount of a gift to a State Officer cannot exceed 50 USD in ruble equivalent on the date of purchase and the type provided such gift is a "token gift" of nature. The gift shall not be provided to a State Officer in return for any action or inaction in favor of the grantor of such permitted gift; otherwise, this may be viewed as a bribe.

Gifts to Commercial Sector:

In general a gift to a Commercial Sector representative cannot exceed 4000 RUR (Four thousand rubles). A gift to a Commercial Sector representative which amounts to \$50 USD can be granted with no prior approval. A gift which is more than 50 USD and up to 4000 RUR can be granted further to preliminary written approval of manager. Allowed gift cards: amounting to 25 USD and for the products/services not competing with HP's ones (e.g. Apple gift cards are not allowed). VISA, AMEX and other gifts equal to provision of monies, are not allowed.

Travel of State Officers:

State Officers are allowed to travel abroad at the expense of third parties only **on official business trips and only on the basis of an agreement between the corresponding state authority and "international or foreign organization,"** provided such agreement is made in writing between the payee company and the relevant authority and is specifying the terms of payment of such travel expenses. In certain cases, regional governors or local governments also issue special regulations in this respect. Therefore, providing travel expenditures to Public Sector Representatives (including Meals and other travel-related expenses) would be permissible if based on a respective agreement, as required by the legislation.

Travel of Quasi Public Sector representatives:

Travel of Quasi Public Sector representatives shall be approved via GBGTE Approval Tool: by way of filling in «PS Recipient Travel Approval Request Form».

Travel of Commercial Sector:

Travel of Commercial Sector is allowed subject to the following: (i) prior written approval of VP; (ii) for travels with accommodation and/or payment for meals, and/or for transports, and/or gifts, amounting to 500 USD per person, shall be approved by Legal as well.

Meals for Public Sector:

Meals for Public Sector are not allowed.

Meals for Quasi Public Sector:

The cost of meal for Quasi Public Sector cannot exceed \$100 USD per person.

Meals for Commercial Sector:

Meals for Commercial Sector are allowed subject to the following criteria:

- 100 USD – no prior approval;

- 100-150 USD – prior written approval of manager;
- 150-500 USD – prior written approval of VP;
- 500 USD (not connected with HP's launched or sponsored event) – prior written approval of VP and Legal.

Azerbaijan

Identification of Government Officials:

“Government Official” for the purposes of the policy shall include:

- State Servant is considered to be government officials under the local law (“Public sector”), and defined as citizen of the Republic of Azerbaijan who holds “salaried” (the salary should be exclusively paid from the state budget) state service positions in the order determined by the laws of the Republic of Azerbaijan, and who swear allegiance to the Republic of Azerbaijan while being recruited to the state service on administrative position.
- Person who is constantly, temporarily or on special power carrying out functions of authority representative; either carrying out organizational-administrative or administrative functions in state bodies, institutions of local government, state and municipal establishments, enterprises or organizations, and also in other commercial and non-commercial organizations (“Quasi-Public sector”)

There is more restrictive local legislation applicable to Public sector (State Officers) described below, whereas to Quasi Public Sector general provisions of the *Global Business Gifts, Travel and Entertainment Policy* will apply in its entirety.

Gifts, Meals, and Entertainment for State Officers:

HP employees may give a gift or provide a meal or entertainment to a State Officer if it is a minor gift, modest meal, or entertainment and the amenity that correspond to conventional hospitality and is valued at \$50 USD with aggregated year value should not exceed approximately USD \$70. No gifts, meals, or entertainment can be provided to a State Officer which may influence or appear to influence the impartial performance of his or her duties, or may be or appear to be a reward relating to his or her duties or might create an impression of such influence, or are given as a reward for performance of his or her duties, or might create an impression of such reward.

Travel of State Officers:

Sponsorship of State Officers' travel is not recommended, though no special provisions in local law. General restrictions applicable to gifts, services and benefits should be applied to sponsorship.

Belarus

Identification of Government Officials:

“Government Official” for the purposes of the policy shall include:

- State Officers that are considered as government officials under the local law (“Public sector”), defined as citizens of the Republic of Belarus who occupy a public position, which provides them with some permissions and charges to carry out certain official duties and have a legal right to make orders in respect of unsubordinated individuals.
- Employees of government-owned entities and public international organizations, who are not considered to be government officials (state servants) under the law of the Republic of Belarus (“Quasi-Public sector”)

There is more restrictive local legislation applicable to Public sector (State Officers) described below, whereas to Quasi Public Sector general provisions of *Global Business Gifts, Travel and Entertainment Policy* will apply in its entirety.

Gifts and Meals to State Officers:

Gifts (other amenities including services) could be granted to the State Officers only during ceremonial or other official events, in the line of duty, or on the occasion of birthday and holidays, if they are handed to the official without any expectations of compensation by corresponding actions and the gift is of a “token” nature. The value of the gift or meal which is given to State Officers should not exceed \$50 USD. If gift exceeds 5 basic units (currently about \$58 USD), such gifts are to be transferred into the State property.

Travel of State Officers:

Sponsored tourist or other travel arrangements would qualify as corrupt practice, subject to a number of exceptions:

- traveling is paid by their close relatives;
- traveling is required under an international treaty of Belarus;
- traveling within the framework of exchange between Belarusian and foreign state authorities;
- traveling is paid by other individuals relations with whom are outside Public Official's scope of duties;
- traveling for personal purpose approved by higher executives of relevant state body.

Kazakhstan

Identification of Government Officials:

“Government Official” for the purposes of the policy shall include:

- State Officers that are considered as government officials under the local law (“Public sector”), defined as citizens of the Republic of Kazakhstan holding, in accordance with the legislatively established procedure, an office in a governmental agency payable from the national budget or local budgets or from the funds of the National Bank of the Republic of Kazakhstan and performing official duties, for the purposes of implementation of the objectives and functions of the State.
- Employees of government-owned entities and public international organizations, who are not considered to be government officials (state servants) under the law of the Republic of Kazakhstan Persons that are permanently, temporarily or under a special authorization carrying out functions of a representative of authority or performing organizational-and-executive or administrative-and-economic functions in the governmental agencies, local self-administration bodies, as well as in the Armed Forces of the Republic of Kazakhstan or other troops or military formations of the Republic of Kazakhstan (“Quasi-Public sector”).

There is more restrictive local legislation applicable to Public sector (State Officers) described below, whereas to Quasi Public Sector general provisions of *Global Business Gifts, Travel and Entertainment Policy* will apply in its entirety.

Gifts, Meals, and Entertainment to State Officers:

No gifts, meals, or entertainment can be provided to the State Officers except for the meals (other travel-related expenses) in connection with sponsorship of travel of State Officers within official business trip as described below.

Conflicting laws in Kazakh legislation

At the same time Article 509 of the Civil Code of the Republic of Kazakhstan contains a general rule according to which ordinary gifts can be presented to Government Officials in connection with their official status or the performance of their official duties. The value of such gift should not exceed \$107USD.

Taking into account that The Law on Combating Corruption directly prohibits the receipt of gifts in connection with the exercise of official powers and related duties, we deem that the above allowance (Article 509 of Civil Code) for a gift of a limited value is a conflict within

Kazakhstan legislation¹. Therefore gifts for Public sector (State Officers) are not recommended.

Travel of State Officers:

Kazakhstan legislation prohibits State Officers' acceptance of invitations to tourist, treatment-and-rehabilitation, or other trips, inside the country or abroad, at the expense of individuals or legal entities, local or foreign, except for trips occurring upon consent of a higher officer or body for participation in scientific, sports, creative, professional or humanitarian events at the expense of organizations. Therefore, sponsorship by HP of the trips of State Officers can only occur upon explicit written consent of a higher officer or body of the governmental agency or institution where the invited person holds a position. Such written consent shall be obtained before applying for the travel sponsorship approval of the State Officer according to HP internal approval process.

Ukraine

Identification of Government Officials:

"Government Official" for the purposes of the policy shall include:

- State Officers that are considered as government officials under the local law ("Public sector"), defined as (i) the persons holding positions in public authorities and departments thereof, who have powers to implement through their professional activities the goals and responsibilities of the State and receive salaries from the State. Persons who act, permanently or temporarily, as government or self-government representatives and occupy, permanently or temporarily, positions in state-owned or public unitary enterprises, institutions or organizations performing organizational-executive or administrative-economic responsibilities
- Persons who act, permanently or temporarily, as government or self-government representatives and occupy, permanently or temporarily, positions in state-owned or public unitary enterprises, institutions or organizations performing organizational-executive or administrative-economic responsibilities ("Quasi-Public sector").

There is more restrictive local legislation applicable to Public sector (State Officers) described below, whereas to Quasi Public Sector general provisions of the *Global Business Gifts, Travel and Entertainment Policy* will apply in its entirety.

Gifts to State Officers:

Government Officials may accept gifts that fall within the generally accepted notions of hospitality, and donations, provided that the value of such gifts does not exceed 50 percent of the minimal wage (approximately \$130 USD) from one source.

Nevertheless it is recommended that the value of the gift or meal which is given to State Officers should not exceed \$50 USD to ensure equal approach for CIS countries.

Meals, Entertainment, and Travel of State Officers:

Sponsorship of meals, travel, and entertainment of State Officers is not allowed.

Uzbekistan

¹ In accordance with the Law No. 213-I of the Republic of Kazakhstan, On Normative Legal Acts, dated 24 March 1998, codes have larger legal force than laws, i.e., in case of controversy between the norms of codes and norms of laws, the norms of codes must apply¹². However, this conflict (between the allowance for gifts of limited value and complete prohibition of gifts) has not until now been tested by the Kazakhstan law enforcement practice and, in particular, by court practice. In this regard, we have contacted top-ranked officials in charge of development of legislative acts in the sphere of state service who acknowledge the existence of the specified controversies in legislation and tend to believe that in case of disputable situations connected with gifts to governmental officials, the Law on Combating Corruption is to be applied. Due to this, we deem that it would be expedient for anyone to refrain from giving gifts until the legislation is appropriately amended.

Identification of Government Officials:

“Government Official” for the purposes of the policy shall include:

- State Officers which are considered as government officials under the local law (“Public sector”) and defined as (i) a representative of the authority; (ii) a person which permanently or temporarily, upon election or appointment, holds in state enterprise, establishment or organization a position, relating to execution of organizational-and-executive or administrative-and-managing duties or authorized to perform actions that lead to formal consequences; (iii) a head of an enterprise, establishment or organizations, representatives of the community, duly vested with powers of state management; (iv) a person occupying a position with organizational-and-executive or administrative-and-managing functions in the self-government organizations.
- Employees of government-owned entities and public international organizations which are not considered to be government officials (state servants) under the law of Uzbekistan (“Quasi-Public sector”)

There is more restrictive local legislation applicable to Public sector (State Officers), whereas to Quasi Public Sector general provisions of the *Global Business Gifts, Travel and Entertainment Policy* will apply in its entirety.

Gifts, Meals, Entertainment, and Travel to State Officers:

Sponsorship of meals, gifts, travel, and entertainment of State Officers is not allowed.

RMC countries (Georgia, Armenia, Kyrgyzstan, Turkmenistan, Tajikistan)

Identification of Government Officials:

“Government Official” for the purposes of the Policy shall include:

- State Officers that are considered as government officials under the national law (“Public sector”), generally defined as representatives of state or regional government and departments, agencies, and instrumentalities thereof (administration, legislature, enforcement, supervision or control, military, state security, judicial, and so forth), who are appointed to serve in any state body or organization of any state/regional/municipal level and paid from the state/regional/municipal budget.
- Employees of government-owned entities and public international organizations who are not considered to be government officials (state servants) under the national law (“Quasi-Public sector”)

Gifts, Meals, Entertainment, and Travel:

Financing of gifts, travel, meals, or entertainment of State Officers (Public Sector) in each respective country of RMC region is not allowed, except for:

- Kyrgyzstan: Only token gifts, symbolic souvenirs presented following the commonly accepted rules of courtesy or during protocol or other official events. Ordinary gifts with value less than approximately USD \$22.;
- Turkmenistan: Gifts are not explicitly prohibited by legislation. The only monetary limitation relates to the deductibility of costs for tax purposes (gifts and benefits more than approximately USD \$175 should be declared).

To Quasi Public Sector representatives general provisions of the *Global Business Gifts, Travel and Entertainment Policy* will apply in its entirety.

Spain Business Gifts, Travel and Entertainment Policy

In Spain the maximum limit of commercial and Public Sector Meals/Entertainment is **\$150 USD per person**.

No prior approval is required for meals/entertainment up to **\$100 USD** per person. However, prior VP approval is required for meals between **\$100 USD** and **\$150 USD**.

Please be reminded that you should always carefully consider the invitees and circumstances of the planned meal/entertainment in advance and refrain from inviting representatives of a Public Sector customer if, for any reason, there is any risk that the meal or entertainment could be considered (illegal) influencing of a Public Sector customer specially when you are aware of an up-coming or pending tender or procurement activity with that Public Customer.

Sweden Public Sector Business Gifts, Travel and Entertainment Policy

You may not give a public sector official, defined as a person who exercises authority on behalf of a public sector entity, anything of value, including gifts, meals, entertainment, travel, or any other business amenity. Further, you may not give a public sector employee anything of value—including gifts, meals, entertainment, travel or any other business amenities—without consulting local HP counsel, except for ordinary business meals of a maximum 225 SEK (approximately \$35 USD).

Switzerland Public Sector Business Gifts, Travel and Entertainment Policy

In Switzerland, Meals/Entertainment for commercial and Public Sector customers up to \$150 USD (per person) does not require prior manager approval.

You should still keep in mind whether meals and entertainment even below this amount are adequate and would not cause the risk to be considered (illegal) influencing of a commercial or Public Sector customer, especially when you are in current negotiations with this customer concerning a tender and/or a tender is up for decision. Please remember also to take into account and respect the internal representation policies of the customer in question.

For HP-sponsored Events the following applies for Swiss Public Sector participants:

For HP-sponsored Events in Switzerland, invitations for Public Sector customers up to \$150 USD follow the general policy and do not require prior approval.

If you invite Public Sector customers to an international HP-sponsored Event and the value is between \$100 USD and \$150 USD the general process as set forth above ("Public sector events not involving U.S. public sector participants, >\$100") does apply to the Public Sector participants from Switzerland as well.

Invitations for Public Sector customers to HP-sponsored Events > \$150 USD require local Legal approval and local Legal will provide you with the necessary forms.

Taiwan Public Sector Business Gifts, Travel and Entertainment Policy

The HP [Public Sector Business Gifts, Travel and Entertainment Policy](#) applies in Taiwan, except that government officers shall not request, arrange, or receive gifts and benefits from any party with a business relationship or interests, unless there is no conflict of interest in the business relationship and the amount shall not exceed \$20 USD. For normal social events such as an engagement, wedding, funeral, birth of a child, moving, promotion, new job, retirement, resignation, illness, and so forth, the amount shall not exceed \$50 USD per event and shall not exceed NT\$10 000 in a fiscal year.

United Kingdom Public Sector Business Gifts, Travel and Entertainment Policy

In addition to the rules provided for in the [Public Sector Business Gifts, Travel and Entertainment Policy](#), you should be aware of and be sensitive to the fact that public sector employees are under their own restrictions regarding the receipt of gifts, travel or hospitality of any kind. Public sector employees are usually required to report all business gifts, travel and hospitality that they receive. This may include reporting business gifts, travel and hospitality that they have declined.

When providing business gifts, travel or hospitality to public sector employees, you should ensure that the recipient of your intended business gift, travel or hospitality is able to receive it without violating their own internal rules and standards by obtaining prior written confirmation from their management (e.g. an executive or senior line manager) that they approve that the recipient can accept the business gift, travel or hospitality without violating any legal or their own internal rules and standards that are applicable. If you are in any doubt about the ability of a public sector employee to receive a business gift, travel or hospitality then you should err on the side of caution by not offering or providing the business gift, travel or hospitality in the first place.

You must never provide business gifts, travel or hospitality to a public sector employee with whom you are potentially entering into a contractual arrangement or other negotiation (such as a dispute resolution process) or a competitive bid process, other than basic courtesies in the form of modest refreshments and food (e.g a working lunch) travel which is in accordance with the Global Business Gifts, Travel and Entertainment Policy.

Commercial agents and subcontractors engaged by HP in the UK are considered to be acting on behalf of HP. Therefore you are required to ensure that any agents or subcontractors you have engaged have been provided with a copy of this policy and have agreed to comply with the rules set out in this policy in all their dealings when acting on behalf of HP.

United States Business Gifts, Travel and Entertainment Policy

HP employees may not offer, give or promise to give, directly or indirectly, an employee of the U.S. federal government, U.S. state/local government, or public higher education institution, or to any private or public K-12 educational institution or library, any item of value—including gifts, meals, entertainment or travel—unless the recipient pays its fair market value.

The prohibition on gifts to private or public K-12 educational institutions and libraries includes those entities' board members, employees, officers, representatives, agents, consultants or independent contractors. Government contractors often have similar restrictions concerning the acceptance of business amenities by their personnel which should be respected in our dealings with them.

Limited exceptions may apply when approved by HP's Chief Ethics and Compliance Officer and Public Sector Legal Counsel. Only very limited exceptions will be considered for approval, such as openly announced marketing activities, appropriate no-charge service offerings, select promotional activities and public policy initiatives, all of which must be individually [pre-screened](#) and expressly approved on a case-by-case basis by the U.S. Public Sector Compliance Office.

Public and private K-12 educational institutions and all libraries are NOT permitted to have any no-charge offerings/free services or gifts and will almost never be granted an exception. Before proceeding with any gift to a K-12 educational institution or library, please ensure you have personally seen confirmation of an exception approval in writing from the U.S. Public Sector Compliance Office.

Please refer to the [U.S. Business Gifts, Travel and Entertainment policy](#) for more information.

Venezuela Public Sector Business Gifts, Travel and Entertainment Policy

The global business gifts, travel and entertainment policy references the amount of \$50 USD, as the maximum value for both customers' gifts or entertainment and business gifts or entertainment to be accepted by employees. In Venezuela, this amount shall be considered to represent the current value of 3 UT (3 "unidades tributarias" or 3 tax units). In Venezuela, the amount of \$100 USD shall be considered to represent the current value of 6 UT (6 "unidades tributarias" or 6 tax units). To eliminate any doubt regarding the applicable UT value, the current value of each UT shall be the one published in the official gazette of the Bolivarian Republic of Venezuela and valid at the time the corresponding amount is calculated for the value of the business amenity. No other equivalencies shall be considered.

Vietnam Public Sector Business Gifts, Travel and Entertainment Policy

The HP [Public Sector Business Gifts, Travel and Entertainment Policy](#) applies in Vietnam, except that the Criminal Code of Vietnam prohibits you from giving any gift or providing a meal, entertainment, or any gratification (hereinafter together referred to as “Amenity”) as an inducement or reward to any person holding an official position of power, or who may be employed by, or acting on behalf of, a public sector entity or government body if that Amenity is valued at more than \$24 USD. You are also prohibited from providing such Amenity of value less than \$24 USD if serious consequences may follow from such action or if you have already provided such Amenity within one calendar year. Those persons holding an official position as identified above are also restricted by the Criminal Code from accepting any Amenities, and this fact should be respected in our dealings with them. Only very limited exceptions will be considered for approval, such as openly announced marketing activities, public policy initiatives, and so forth, and these will be considered on a case-by-case basis. Violation of the Criminal Code can result in penalties including imprisonment, fine, or capital punishment depending on the seriousness of the crime.

Contact the Office of the General Counsel for further clarification.

References

[HP Accounting and Finance Manual](#)

[Dealing with Business Intermediaries \(HP010-11\)](#)

[U.S. Business Gifts, Travel and Entertainment Policy](#)

[Facilitation Payments Policy \(HP011-03\)](#)

[Global Business Gifts, Travel and Entertainment Approval Tool](#)

[Anti-Corruption Manual](#)

[Records Management Policy \(HP010-02\)](#)

[HP Standards of Business Conduct](#)

[HP Meeting and Event Guidelines](#)

[Hospitality and Promotional Activity Guidelines](#)

Note: This version of the policy is provided for external publication. Accordingly, all HP-internal hyperlinks have been disabled.