



# **Hewlett Packard Enterprise**

## **Hewlett Packard Enterprise Legal and Regulatory Compliance Program Tool Guide**



# Introduction

Hewlett Packard Enterprise (HPE) values our business relationship and believes in our mutual commitment to conduct business with the highest standards of integrity.

We are committed to develop a successful and ethical partnership.

Hewlett Packard Enterprise Legal and Regulatory Compliance Program Tool Guide provides guidelines on completing the HPE Compliance Program.

Please note that a necessary part of Hewlett Packard Enterprise Compliance Program is a periodic refresh of each Partner's compliance profile.

To access the Hewlett Packard Enterprise Compliance Program, HPE Compliance team will issue an invitation via email.

❖ **In this matter:**

- Expect an invitation email to be sent to your company's primary HPE Compliance Program point of contact containing a system link, user ID, and password.
- Please review and follow steps listed on the login page.
- Display language may be changed on the login page in the section with international flags.

❖ **System Requirements:**

- Internet Explorer v6.0 is not supported. Use another browser, such as Firefox or a later IE version;
- Enable JavaScript;
- Install the latest [Adobe Flash Player](#);
- If the invitation was not received, check recipient's junk mail folder. If not found, corporate email filters may be blocking delivery.
- If unable to resolve, see the last slide for HPE contact information.



# Steps to complete the process

# Step 1

## Access the tool

Welcome Hewlett Packard Enterprise Partner,

Hewlett Packard Enterprise has established this partner compliance program to support its ongoing commitment to meet all legal and compliance obligations. This program is designed to ensure that Hewlett Packard Enterprise and its partners are in compliance with the laws and regulations of the United States and other countries in which Hewlett Packard Enterprise conducts business. Within this partner compliance website, Hewlett Packard Enterprise will ask you to provide certain information to ensure compliance. The information requested is limited and necessary to complete Hewlett Packard Enterprise's legal due diligence responsibilities. Hewlett Packard Enterprise will only use the personal information and other information you provide in this questionnaire to validate your Company's compliance with all applicable laws, regulations and Hewlett Packard Enterprise policies, and to conduct investigations into possible breaches.

Hewlett Packard Enterprise will use the information you provide in the questionnaire to determine whether to maintain a contractual relationship with you or your Company. If Hewlett Packard Enterprise determines that you have provided any false, incomplete, or misleading responses to these questions, Hewlett Packard Enterprise may modify the terms of the contract, terminate the contract, suspend all transactions with you or your Company, or take any other action allowed by law.

**IMPORTANT PRIVACY NOTICE** - This Hewlett Packard Enterprise Legal and Regulatory Compliance program website and the Hewlett Packard Enterprise Due Diligence Questionnaire will ask you to provide Hewlett Packard Enterprise with personal data relating to your employees, directors, owners and shareholders and their family members. This information is required by Hewlett Packard Enterprise to conduct a level of due diligence in relation to its existing and prospective partners which is sufficient to ensure compliance with anti-corruption legislation, including the Foreign Corrupt Practices Act and the U.K. Bribery Act.

Hewlett Packard Enterprise may in certain circumstances collect additional personal information via publicly available and other on and off-line sources with the assistance of a third party contractor. Where that involves the collection of sensitive personal data such as data relating to political beliefs, criminal convictions, trade union membership, Hewlett Packard Enterprise will, where required by law, obtain written consent of the affected individual and may request your assistance to do so. Any personal data provided to or collected by Hewlett Packard Enterprise will be processed solely for the purpose of undertaking due diligence activities in connection with Hewlett Packard Enterprise's compliance program, which may include additional investigations or forensic analysis.

Hewlett Packard Enterprise may transfer personal data to other Hewlett Packard Enterprise-owned businesses or professional advisors in the USA and worldwide as required in connection with these due diligence activities. Hewlett Packard Enterprise shall process personal data in compliance with applicable privacy laws and the [Hewlett Packard Enterprise Global Master Privacy Policy](#) which articulates the privacy and data protection principles followed by Hewlett Packard Enterprise around the world. The Hewlett Packard Enterprise Global Master Privacy Policy includes details of how individuals may exercise their legal rights in connection Hewlett Packard Enterprise's use of their personal data, including obtaining copies of their personal data.

#### Steps to satisfy Hewlett Packard Enterprise questionnaire requirements:

NOTICE: Only an officer of your company should complete the following steps. An officer is defined as an individual with signatory authority and the ability to represent your company in all legal, regulatory and compliance matters. Please identify this signatory authority and have them complete the following steps.

**Step 1)** Login below with the user ID & password credentials provided in the invitation email from Hewlett Packard Enterprise

**Step 2)** Take the required Legal Compliance Training when prompted in the process.

**Step 3)** For a better understanding of questionnaire requirements, you may access the [Hewlett Packard Enterprise Legal and Regulatory Compliance Program Tool Guide](#) using the link near the top of each webpage for a brief description of the steps required to complete and submit the questionnaire.

**Step 4)** Complete and submit the online questionnaire and Anti-Corruption Declaration requirements. You will no longer be able to modify the information contained within. A "Thank You" message will appear after a successful questionnaire submission.

#### Display Language



#### Editing a saved Questionnaire?

Email Address:

PartnerA@PartnerA.com

Password:

••••••••

Submit

Forgot your password?  
Change your password

Enter the e-mail address and password provided from the HPE Compliance Program invitation

## Step 2

### Check company details

NOTICE: Only an officer of your company should complete the following steps. An officer is defined as an individual with signatory authority and the ability to represent your company in all legal, regulatory and compliance matters. Please identify this signatory authority and have them complete the following steps.

#### Confirm Profile

Official Company Name:	TESTHPE Partner A
Alternate Trade or Business Name(doing business as):	
Physical Business Location	
Address 1:	123 Street
Address 2:	
City:	City
Country:	Country
State/Province:	
Postcode:	
Company Telephone:	123

#### Main Point of Contact

Name:	Partner A Contact
Position:	CEO
Telephone:	123
Email Address:	PartnerA@PartnerA.com

#### Training

Take the required Legal Compliance Training presentation which provides an overview of important legal and regulatory requirements including the United States Foreign Corrupt Practices Act (FCPA) and Global Trade Export Compliance requirements. Please [Click to access training](#).

\*  Training Completed

[→ Continue](#)

[→ Save and Close](#)

**Please ensure company profile details are accurate on the Confirm Profile page.**

- To update profile information, please send email to the appropriate contact point below;
- If all information is correct, please click “Continue”

**For further information, please contact:**

For Europe, Middle East, Africa region:

[Legal.and.Regulatory.Compliance.EMEA@hpe.com](mailto:Legal.and.Regulatory.Compliance.EMEA@hpe.com)

For North America, Central America, and South America region:

[Legal.and.Regulatory.Compliance.AMS@hpe.com](mailto:Legal.and.Regulatory.Compliance.AMS@hpe.com)

For Asia Pacific Japan region:

[Legal.and.Regulatory.Compliance.APJ@hpe.com](mailto:Legal.and.Regulatory.Compliance.APJ@hpe.com)

## Step 3.1

### Key personnel details

**Due Diligence Questionnaire**

\* All Fields Are Required  
Hewlett Packard Enterprise Legal and Regulatory Compliance Program Tool Guide

[Click here to Add Key Personnel](#)

\* At least one Key Person is required.

OWNERSHIP: If publicly traded list each person or entity holding 15% or more individually

Name	Email	Position	Address	Phone	Ownership
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BOARD OF DIRECTORS: Please list all Members of the Board of Directors and all Officers of your Company

Name	Email	Position	Address	Phone
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KEY MANAGEMENT: List other Key Employees who will manage your Company's relationship with Hewlett Packard Enterprise, have decision making authority relevant to Hewlett Packard Enterprise products or services or be involved with projects involving Hewlett Packard Enterprise products or services.

Name	Email	Position	Address	Phone
------	-------	----------	---------	-------

KEY CONSULTANT(S): If you are providing consulting services, please identify the key individual(s).

Name	Email	Position	Address	Phone
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[Continue](#)

[Save and Close](#)

[Go Back | Edit](#)

The Personnel section requires you to provide details of your Company's key personnel.

- The Due Diligence Questionnaire requires your Company to provide personnel information to help Hewlett Packard Enterprise better understand your business.
- Select "Click here to add key personnel" to start.

## Step 3.2

### Key personnel details

**Personnel**  
**\* All Fields Are Required**  
Hewlett Packard Enterprise Legal and Regulatory Compliance Program Tool Guide

<b>1</b>	<b>*Name</b> Partner A CEO Name	<b>Email</b> Partner_A@1234.com	<b>Phone</b> 1234 CEO Phone no	<b>*Role:</b> <input checked="" type="checkbox"/> Owner 33.000 % <input type="checkbox"/> Board Member	<b>Check all that apply</b> <input type="checkbox"/> Key Manager <input type="checkbox"/> Key Consultant
<b>2</b>	<b>*Name</b> Partner A CFO Name	<b>Email</b> Partner_CFO@1234.com	<b>Phone</b> 1234 CFO Phone no	<b>*Role:</b> <input type="checkbox"/> Owner 0.000 % <input checked="" type="checkbox"/> Board Member	<b>Check all that apply</b> <input type="checkbox"/> Key Manager <input type="checkbox"/> Key Consultant
<b>3</b>	<b>*Name</b> Partner A Ops Manager	<b>Email</b> Partner_COO@1234.com	<b>Phone</b> 1234 COO Phone no	<b>*Role:</b> <input checked="" type="checkbox"/> Owner 67.000 % <input type="checkbox"/> Board Member	<b>Check all that apply</b> <input checked="" type="checkbox"/> Key Manager <input type="checkbox"/> Key Consultant

→ Save  
→ Cancel

- Key personnel detail data field is required (e.g. full name in the “Name” box and check at least one role for each person that you include);
- For “Owner”, please specify the ownership percentage and include all individuals with greater than 15% ownership;
- Once data has been entered for up to 4 key personnel, review data accuracy, then click “Save” at the bottom of the page.



## Step 3.3

### Key personnel details

[Click here to Add Key Personnel](#)

**\* At least one Key Person is required.**

**OWNERSHIP:** If publicly traded list each person or entity holding 15% or more individually

Name	Email	Position	Address	Phone	Ownership
Partner A CEO Name	Partner_A@1234.com	CEO	1234 Partner A address	1234 CEO Phone no.	34.000%

**BOARD OF DIRECTORS:** Please list all Members of the Board of Directors and all Officers of your Company

Name	Email	Position	Address	Phone
Partner A CFO Name	Partner_CFO@1234.com	CFO	1234 Partner A address	1234 CFO Phone no.

**KEY MANAGEMENT:** List other Key Employees who will manage your Company's relationship with Hewlett Packard Enterprise, have decision making authority relevant to Hewlett Packard Enterprise products or services or be involved with projects involving Hewlett Packard Enterprise products or services.

Name	Email	Position	Address	Phone
Partner A Manager Name	Partner_manager@1234.com	Manager	1234 Partner A address	1234 Manager Phone no.

**KEY CONSULTANT(S):** If you are providing consulting services, please identify the key individual(s).

Name	Email	Position	Address	Phone
------	-------	----------	---------	-------

[→ Continue](#)

[→ Save and Close](#)

[← Go Back | Edit](#)

Once you click “Save”, your browser will return to the main Personnel screen.

- It will have all personnel information that you entered. If a data entry error is identified, please click on the individual name that you need to edit for correction.
- If your company has additional key personnel, please repeat the steps in the previous slide.
- Once your key personnel list is complete, click “Continue”.

## Step 4 Questionnaire\*

**Due Diligence Questionnaire**

**\*All Fields Are Required**

**Section 1: The following questions 1 through 15 are to be completed by ALL Partners**

1. Does your Company have more than 10 employees?  Yes  No

Reference to "Company" shall include any subsidiaries or affiliates. "Subsidiaries and affiliates" includes any company, partnership or other entity that the company submitting this questionnaire or controls, is controlled by, or is in under common control with.

2. Does your Company currently sell, plan to sell, or market any IPI products or services to the Public Sector?  Yes  No

The following are examples of Public Sector persons and entities:

- Federal, state, provincial, or local government entity
- Company, enterprise, or agency that is 50% or more government owned
- Government entity, department, ministry, agency, or internationally
- Government or public hospital, school, college, or university
- Companies operating in government owned or operated industries such as oil, gas, or telecommunications
- Government related organization
- Political party, public official or candidate for public office
- Non-profit members
- International public organizations such as the United Nations or World Bank
- Employees of an official of any company, enterprise, or agency listed above

3. Does your Public Sector business currently exceed 5% of your Company's total annual revenue?  Yes  No

*\*The image is blurred for confidential reasons*

- There are 15 questions in this questionnaire;
- Most of them will be in "Yes/No" format;
- If you need to elaborate on a response, please use the available text box;
- Once you have completed the questionnaire, please click "Continue".

## Step 5 Anti-Corruption Compliance Declaration

This is the final step in  
the process.

Hewlett Packard Enterprise may transfer personal data to other Hewlett Packard Enterprise owned businesses or professional advisors in the USA and worldwide as required in connection with these due diligence activities. Hewlett Packard Enterprise shall process personal data in compliance with applicable privacy laws and the [Hewlett Packard Enterprise Global Privacy Policy](#) which articulates the privacy and data protection principles followed by Hewlett Packard Enterprise around the world. The Hewlett Packard Enterprise Global Privacy Policy includes details of how individuals may exercise their legal rights in connection Hewlett Packard Enterprise's use of their personal data, including obtaining copies of their personal data.

**SUBMITTED BY**

- Name
- Title
- Telephone
- Email
- Custom Email
- Date **2018-10-03 09:46 UTC**

Submit  
 Save and Close (Do not Submit)  
 Go Back (Exit)

Note: Selecting "Submit" will send your information to Hewlett Packard Enterprise for evaluation. You will no longer be able to modify the information contained within.

Please review the “Anti-Corruption Compliance Declaration” on the Submit tab, then:

- Complete the required fields below the declaration section;
- Once you have completed this, please click “Submit”.

### IMPORTANT:

After clicking the “Submit” button, please wait for a moment for a “Thank you” page to appear before closing your internet browser to confirm successful transmission of your responses to HPE.



# Hewlett Packard Enterprise

For Further information, please contact:

**For Europe, Middle East, Africa region:**

[Legal.and.Regulatory.Compliance.EMEA@hpe.com](mailto:Legal.and.Regulatory.Compliance.EMEA@hpe.com)

**For North America, Central America, and South America region:**

[Legal.and.Regulatory.Compliance.AMS@hpe.com](mailto:Legal.and.Regulatory.Compliance.AMS@hpe.com)

**For Asia Pacific Japan region:**

[Legal.and.Regulatory.Compliance.APJ@hpe.com](mailto:Legal.and.Regulatory.Compliance.APJ@hpe.com)

# Thank you!