



**Global Compact Learning Forum
United Nations**

Business and Human Rights: The Case of Hewlett-Packard

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Case Abstract

This case study describes how a technology company developed a Human Rights and Labor Policy within their Global Citizenship strategy, and is engaged in the complex and unclearly defined issues of human rights within their business. The case also describes ongoing development and challenges, and examines how the company has been implementing the United Nations Global Compact, specifically the principles that deal with human rights.

Introduction

Hewlett-Packard, headquartered in Palo Alto, California, is a technology solutions provider to consumers, businesses, and institutions. It operates in 178 countries and employs approximately 160,000 people across the globe. A distinct culture at HP, to be described in more detail, emanates strongly from within the corporation. Stanford University classmates Bill Hewlett and Dave Packard founded HP in 1939 in their Palo Alto garage. Their first product was an audio oscillator - an electronic test instrument used by sound engineers. One of HP's first customers was Walt Disney Studios, which purchased eight oscillators to develop and test an innovative sound system for the movie "Fantasia." Employees within HP claim to share a passion for satisfying customers, an intense focus on teamwork, speed and agility, and a commitment to trust and respect for all individuals.

The company of HP is divided into four businesses groups:

Table 1: HP's Core Business Groups

Enterprise Systems Group (ESG)	ESG focuses on providing the key technology components of enterprise IT infrastructure to enhance business agility, including enterprise storage, servers, management software and a variety of solutions.
Imaging and Printing Group (IPG)	HP is the leading provider of printing and imaging solutions for both business and consumer use. IPG includes printer hardware, all-in-ones, digital imaging devices such as cameras and scanners, and associated supplies and accessories. It also is expanding into the commercial printing market.
HP Services (HPS)	HP Services is a premier, global IT services team. It offers guidance, know-how and a comprehensive portfolio of services to help customers realize measurable business value from their IT investments.
Personal Systems Group (PSG)	PSG focuses on supplying simple, reliable and affordable personal-computing solutions and devices for home and business use, including desktop PCs, notebooks, workstations, thin clients, smart handhelds and personal devices.

Although its annual revenues for fiscal year ending October 31, 2002 were \$72 billion USD and its scope and reach clearly span the globe, HP still revels in the “garage start-up” mentality of a company that is innovative, human-focused, and socially committed. Indeed co-founder David Packard stated in 1942:

Many assume, wrongly, that a company exists simply to make money...the real reason HP exists is to make a contribution...to improve the welfare of humanity...to advance the frontiers of science...Profit is not the proper end and aim of management – it is what makes all of the proper ends and aims possible...

Over 60 years later, current CEO Carly Fiorina re-states even more eloquently and expanded-upon in 2003:

We believe that the winning companies of this century will be those that not only increase shareholder value but increase social and environmental value... By developing products and solutions that are environmentally sound, by bringing the benefits of information technology to emerging markets, by holding our company to the highest standards of business conduct, and by giving back to the communities in which we operate, HP is contributing to a more sustainable future while also making HP a stronger company and the preferred IT solutions provider.

Through high-speed growth, mergers and acquisitions, down turns, new products, new management, and half a decade later, HP still appears to remain as committed to social responsibility and creating positive social impact today as they did when started in the garage of co-founders David Packard and Bill Hewlett.

HP states the following as its corporate objectives, which were first written down by the co-founders in 1957:

Table 2: HP Corporate Objectives

Customer Loyalty	To provide products, services and solutions of the highest quality and deliver more value to our customers that earns their respect and loyalty.
Profit	To achieve sufficient profit to finance our company growth, create value for our shareholders and provide the resources we need to achieve our other corporate objectives.
Market Leadership	To grow by continually providing useful and significant products, services and solutions to markets we already serve—and to expand into new areas that build on our technologies, competencies and customer interests.
Growth	To view change in the market as an opportunity to grow; to use our profits and our ability to develop and produce innovative products, services and solutions that satisfy emerging customer needs.
Employee Commitment	To help HP employees share in the company's success that they make possible; to provide people with employment opportunities based on performance; to create with them a safe, exciting and inclusive work environment that values their diversity and recognizes individual contributions; and to help them gain a sense of satisfaction and accomplishment from their work.

Leadership Capability	To develop leaders at every level who are accountable for achieving business results and exemplifying our values.
Global Citizenship	Good citizenship is good business. We live up to our responsibility to society by being an economic, intellectual and social asset to each country and community in which we do business.

HP and the UN Global Compact

In his address to The World Economic Forum in January of 1999, United Nation Secretary-General Kofi Annan challenged business leaders to join an international initiative – the Global Compact – that would bring companies together with UN agencies, labor, and civil society to support nine principles in the areas of human rights, labor, and the environment. The Global Compact’s operational phase was launched at UN Headquarters in New York in July of 2000.

Through the power of collective action, the Global Compact seeks to advance responsible corporate citizenship so that business can be part of the solution to the challenges of globalization. In this way, the private sector – in partnership with other social actors – can help realize the Secretary-General’s vision: a more sustainable and inclusive global economy. The Global Compact is a voluntary corporate citizenship initiative with two objectives:

- To mainstream the nine principles in business activities around the world
- To catalyze actions in support of UN goals

The Global Compact is not a regulatory instrument – it does not “police,” enforce, or measure the behavior or actions of companies. Rather, the Global Compact relies on public accountability, transparency, and the enlightened self-interest of companies, labor, and civil society to initiate and share substantive action in pursuing the principles upon which the Global Compact is based. To this end, it has been largely criticized as “having no teeth” and as being fairly innocuous.

HP was one of the earlier US companies to become a participant in the UN Global Compact. This case will focus on HP’s adherence to UN Global Compact principles one and two, which focus on human rights:

Table 3: UN Global Compact Human Rights Principles

Principle 1	Businesses should support and respect the protection of internationally proclaimed human rights within their sphere of influence.
Principle 2	Businesses should make sure that they are not complicit in human rights abuses

Human Rights and Business

Human rights are rights that individuals have simply because they are human. They are designed to respect the dignity and integrity of the individual. Human rights are fundamental principles that, if respected, ensure an individual can live a life of dignity, free from deprivation and abuse, free to participate in their community, and can express their beliefs. Human rights are recognized in international law. Although the rights are best achieved by action within a national legal system, such as the passing of laws and implementation of government programs, the national government is not the source of a person's human rights. It follows that the government cannot withdraw human rights at will.¹

Human rights, as we know them today, grew out of the reaction against the horrors experienced during the Second World War. At the formation of the United Nations in 1945, one of the UN's stated objectives was to encourage respect for, and realization of, human rights. Not long after its formation, the UN produced the Universal Declaration of Human Rights, which was adopted by the nations of the world sitting in the General Assembly of the United Nations. The Declaration was adopted without a dissenting vote being cast, signifying an extremely high level of commitment to the principles contained in the Declaration. Since then numerous more focused and specific human rights documents have been drafted and accepted, but the Universal Declaration remains the foundational document in the human rights field.² The Universal Declaration contains a relatively comprehensive set of rights. It covers civil and political rights, as well as economic, social and cultural rights. Some of the main categories of rights covered by the Declaration include:

- Physical integrity
- Fair treatment before the law
- Equal protection
- Freedom of belief, speech, and association
- Political participation
- Access to education
- Just and favorable conditions of work
- Adequate standard of living

¹ For more on the nature and sources of human rights see J., Donnelly, *Universal Human Rights in Theory and Practice*, Cornell University Press, Ithaca, 1989 pp. 14 – 19 and R., Higgins, *Problems and Process: International Law and How We Use It*, Clarendon Press, Oxford, 1994, pp. 95-110.

² For more on the current system of human rights protection at the UN level see H., Steiner and P., Alston, *International Human Rights in Context: Law, Politics, Morality*, Oxford University Press, Oxford, 2000 pp. 137-141.

- Participation in cultural life

A question is often raised concerning the scope of a firm's responsibility for human rights: If a business professes a commitment to human rights, do they become responsible for doing something about every human rights issue wherever it occurs? The answer is no. Businesses should think in terms of being responsible within their 'sphere of influence'.³ A company's sphere of influence can be divided into four broad areas:

1. core operations
2. business partners
3. host communities
4. advocacy/policy dialogue

A company's core operations include issues that many companies are familiar with, such as labor rights, the regulation of the behavior of security forces, and independent monitoring, verification and reporting of company performance. In terms of relations with business partners, companies should ensure that business partners have an equivalent commitment to human rights and they should have some sort of monitoring and compliance verification processes in place. Effects of operations on the human rights of host communities should form part of the impact assessment performed by the company, and these communities should regularly be consulted on questions concerning human rights. Finally, companies should have a commitment to uphold international human rights standards in their dialogue with governments. A company might choose to achieve this by quiet diplomacy or advocacy, but whatever approach a company chooses should have some response to abuses such as the arbitrary detention of labour activists, unexplained disappearances of workers, or abuse committed by government-provided security forces operating at or around a company's location.⁴ It can be seen from this discussion of issues that arise within a company's 'sphere of influence' that human rights extends beyond issues relating to how a company deals with its own immediate work force, although that remains vitally important. Human rights are also concerned with the broader impact that a company has in the communities in which it operates.

Following are some examples of ways in which human rights arise in the business context. **Non-discrimination** is required in all dealings. This includes interactions with employees, customers, suppliers, partners, and contractors. Human rights issues might arise in relation to the behavior of **security guards** in and around company facilities. Issues include excessive use of force by security guards in the performance of their

³ Amnesty International and the Prince of Wales Business Leaders Forum look in some detail at a company's obligations in terms of their sphere of influence. See Amnesty International and The Prince of Wales Business Leaders Forum, *Human Rights: Is it Any of Your Business*, April 2000, pp. 28-9.

⁴ Amnesty International and The Prince of Wales Business Leaders Forum, *Human Rights: Is it Any of Your Business*, April 2000, pp. 28-9.

duties, the implication of members of the security forces in human rights abuse in the area, and the use of security forces to shut down legitimate forms of protest by workers or community members against the company. In relation to **communities**, human rights issues could arise in the context of competition between the company and local populations over land and other resource use. These issues will be particularly acute where indigenous populations are involved. People may be deprived of their means of securing a livelihood (or practicing their religion or culture) by the location of, or demand for local resources by, the new enterprise, they may be forcibly removed by the government to facilitate the new venture, or their health might be adversely affected by the activities conducted by the facility. In dealing with **employees**, fair working conditions, freedom of association and collective bargaining, freedom from slavery, and health and safety need to be ensured in relation to workers wherever they are located, irrespective of the level of protection those workers are afforded under national legislation.

NGOs have long been involved in the study and connection of human rights responsibilities to global business. For example, Amnesty International and the Prince of Wales International Business Leaders Forum have been engaged in an ongoing study that illustrates the geography of corporate risk within human rights segmented by industry. For the “IT Hardware and Telecommunications” sectors, into which HP falls, they believe the following four issues are under the human rights spotlight:

- Freedom of expression
- Forced labor
- Links to repression
- Access to knowledge⁵

However, it is not only major NGOs who appear to be engaged in corporations being involved positively in issues of human rights. In Global Issues Monitor, an ongoing large-scale study conducted by Environics International in 2003, which polled over 1,000 citizens in 20 countries, respondents cited “human rights” as the fourth highest priority for business, falling under “the rich/ poor gap,” “biodiversity,” and “basic education.”⁶ Another study conducted by Edelman on corporate social responsibility (CSR) which tracks attitudes towards business, media, government, and NGOs, the technology industry as a whole was viewed as the leading industry in CSR, leading consumer packaged goods, retail, manufacturing, pharmaceutical, publishing, automotive, financial services, and energy/ oil and gas industries.⁷ Yet respondents were only 38% trustful that business

⁵ Business & Human Rights: A geography of corporate risk, Amnesty International and The Prince of Wales International Business Leaders Forum, November, 2001.

⁶ 2003 CSR Monitor, Environics International, March 2003.

⁷ Edleman, Rebuilding Public Trust Through Accountability and Responsibility, address to the Ethical Corporation Magazine Conference, New York City, October, 2002.

as a whole was adequately addressing human rights issues. Finally, the Reputation Institute at Harris Interactive found that “Treatment of Human Rights/ Employees” was *the* most essential element of corporate citizenship in Europe, the U.S., and Scandinavia. So while the tech industry as a whole is seen as a leader in CSR in general, stakeholders are becoming increasingly engaged in and scrutinizing of human rights as a component of CSR in business.

Human Rights at HP

One senior manager from HP stated a compelling belief that the term “human rights” is largely an NGO term, not truly one that is used business, and certainly *not* a term that has been used in the past at HP.⁸ This was clearly confirmed in the interview process that was conducted for this study. A clear and succinct definition of human rights, as described above, was sent out to all interview respondents prior to the interviews. Even after that, a significant portion of each interview was spent detailing what is meant by the term “human rights,” and fielding questions about the unbundling of the aspects of the term.

That is not to say that there is no attention paid to areas of human rights within HP; in fact, there is considerable commitment and attention. It is simply that within HP, treating employees fairly, not engaging in age or race discrimination or using hiring agencies that do, and not engaging with suppliers who do not comply with HP’s Supplier Code of Conduct is not extrinsically viewed by HP managers as paying attention to human rights per se; it is simply good business and part the “HP way.” HP has recently publicly aligned itself to the Universal Declaration of Human Rights⁹. HP upholds and respects human rights as reflected in the *Universal Declaration of Human Rights*. HP is also committed to fair labor practices and the respectful treatment of all employees, including the protection of workplace health and safety, and data-privacy protections.

HP has policies that deal with a number of human rights issues relevant to their operations (eg. privacy, accessibility and supply chain management) and it is active in terms of developing and supporting community development activities in parts of the world in which they operate.

Commitment to the Universal Declaration of Human Rights

⁸ Interview with Senior Vice President, Corporate Affairs, HP.

⁹ See HP's Commitment to Global Citizenship, 17 July 2003, <http://www.hp.com/hpinfo/globalcitizenship/>

A commitment to upholding and respecting human rights as reflected in the Universal Declaration of Human Rights has recently been included in HP's Commitment to Global Citizenship. The Global Citizenship Commitment goes on to set out HP's "Human Rights and Labor Policy" which focuses heavily on labor rights. The policy addresses forced, bonded or involuntary prison labor, child labor, minimum wages, working hours, non-discrimination, harsh or inhuman treatment, and freedom of association. For the most part the rights under this policy are expressed in a way that links them to compliance with local laws.

Supply Chain

HP recognizes that this is the area in which they have the most risk if human rights are not a focus; however, their efforts around supply chain and human rights are fairly nascent. The company currently contractually obliges its top 40 suppliers, which includes 100 sites and accounts for 80% of their spend dollars, to commit to HP's supply chain code of conduct. HP is in the process of increasing the number of suppliers it requires to make this commitment and strengthening the means by which it ensures compliance with the obligation. Eventually, this code of conduct will be explicit in all new supplier contracts, so compliance will be a necessity to do business. In developing their supply chain code of conduct, HP did their own extensive benchmarking and research, and worked with Business for Social Responsibility, a think tank and consultancy around CSR based in San Francisco, California. The Director of Supply Chain Services stated that they scoured the landscape of supplier codes of conduct, looked at the various international standards, even looked at the UN Global Compact- but none were satisfactory or entirely relevant to HP. So they developed their own code. They did find one company whose code they modeled and that was British Telecom. The BT code was derived from the Ethical Trading Initiative standard, which HP felt closely embodied the elements that were important to them.

The "HP Supplier Code of Conduct" professes to focus on compliance with local laws in the areas of environment, worker health and safety, and labor and employment practices, and in intended to work in conjunction with management systems to measure, improve and communicate progress in these areas. The treatment of labor issues is fairly comprehensive and, despite the use of headings that refer to compliance with local laws, contains standards, for example, in relation to non-discrimination and prison labor, which may or may not be covered by local legislation. The focus on these issues is positive and its effectiveness will be greatly enhanced by the planned improvements in compliance monitoring. To meet HP's human rights obligations, the supplier code of conduct should be expanded to cover human rights matters beyond labor issues, matters such as performance and monitoring of security guards by suppliers; the impact on the local community of supplier operations; and the penalization of suppliers for corrupt or human rights-abusive regimes.

Currently, HP monitors its supply chain using a self-assessment questionnaire completed by HP's top 40 suppliers. HP then works collaboratively with suppliers to achieve the required standards in any area that is identified as falling below HP requirements. HP's Director of Supply Chain Services reports that HP's suppliers take this process very seriously given the importance to them of their relationship and business with HP. HP is moving to expand and strengthen their supply chain monitoring. They are extending self-assessment beyond the top 40 suppliers to the suppliers HP regards as 'high risk'. At the same time they are strengthening the monitoring of the top 40 suppliers by utilizing HP's own procurement auditing capacity to conduct site assessments of supplier performance, moving beyond the self-assessment model. In time, this model will also be extended to the high risk suppliers. Finally, HP is currently researching appropriate entities to conduct third-party assessment of supplier performance. Selective third-party assessment will be the final stage in the evolution of supply chain monitoring at HP.¹⁰

Privacy

HP invests considerable energy in the protection of information privacy for its consumers and its employees. HP has long had a policy dealing with employee information privacy stemming from HP's focus on 'doing the right thing' for their employees as part of the 'HP way'. From relatively humble beginnings as a one-person operation four years ago, the HP privacy program has grown considerably and now undertakes co-coordinated strategy on privacy for consumers and employees and conducts training on employee and customer data handling.

Since January 2001 HP has self-certified its privacy practices as consistent with U.S.-E.U. Safe Harbor principles on Notice, Choice, Onward Transfer, Access and Accuracy, Security, and Oversight/Enforcement. The Safe Harbor principles were designed in response to the prohibition in the European Commission's Directive on Data Protection on the transfer of personal data to non-European Union countries that do not provide 'adequate' privacy protection. HP also meets the requirements of the Council of Better Business Bureau's BBBOnLine Privacy Program. HP is a founding sponsor of the BBBOnLine Privacy Program, a privacy certification scheme that awards a privacy seal to businesses that have proven to meet standards relating to the following: posting online privacy notices; completing a privacy assessment; monitoring and review; and participation in the program's consumer dispute resolution system.

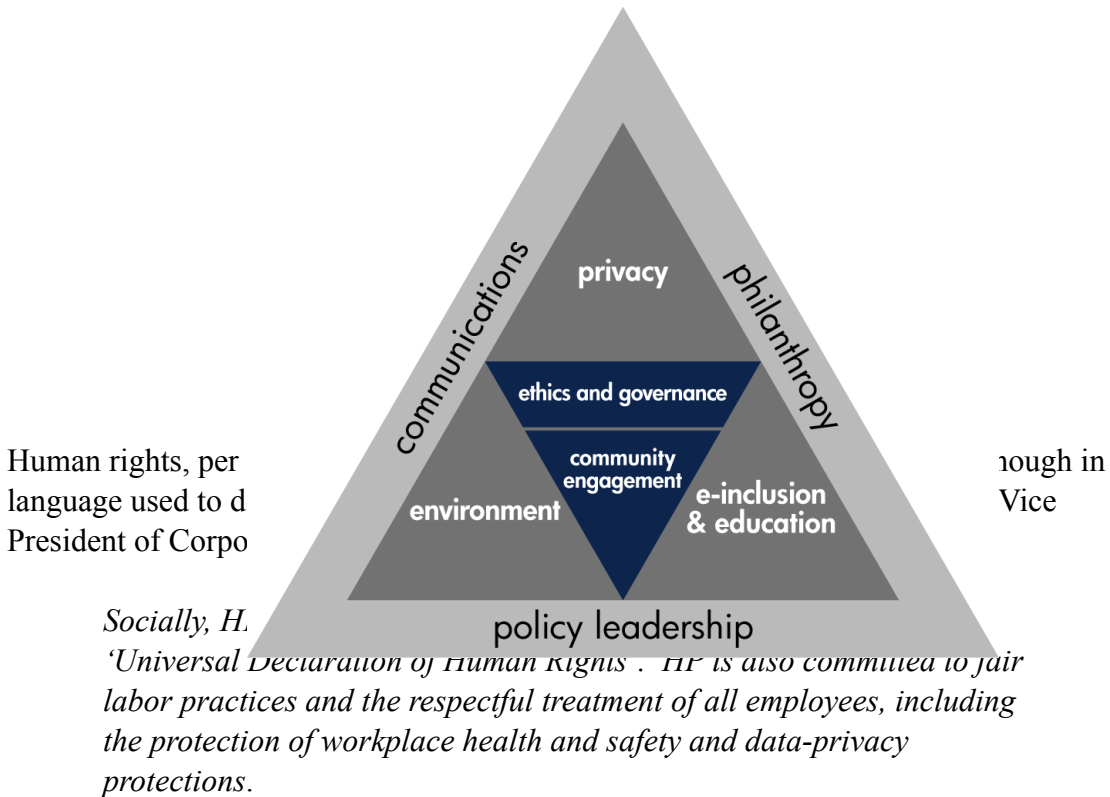
HP adopts the approach of applying a consistent global policy for privacy protection and complies with that policy or local laws, whichever are more stringent.

¹⁰ Interview with Director of Supply Chain Services, HP.

CSR

As Global Citizenship was outlined above as one of HP’s seven core corporate objectives, HP has developed a well-integrated framework for this citizenship strategy:

Figure 1: HP’s Global Citizenship Framework



HP has four separate policies that address these topics: the Environmental, Health and Safety Policy; the Human Rights and Labor Policy, the Privacy Policy, and the Supply Chain Commitment Policy. Each policy includes issues of human rights within them, ranging from employee health and safety to freely chosen employment to privacy of personal data.

There seems to be clear evidence, then, that ‘human rights’ as a term has not made it into the language of HP’s business managers, but when the term is unbundled, evidence of careful attention to human rights is clearly visible.

Labor

Country human resources managers were very aware of human rights issues as they relate to employment, and seemed confident that HP was duly addressing human rights issues.

For example, in Malaysia, HP's competitors tend to employ local indigenous employment agencies. It is standard in Malaysia for these agencies to both collect information on and use in hiring decisions data on age and race. There is no local law against doing so. However HP Malaysia has chosen not to use these local temp agencies for this reason, and instead uses global temp agencies which adhere to HP's Human Rights and Labor Policy. The Human Resources Manager believes that HP is ahead of the local country laws, and while she fully believes in this position and the "HP way", she also admits that HP undoubtedly loses business and pays more for labor than companies who use local employment agencies. HP has engaged with the local government in trying to improve local labor laws, but even being in Malaysia for 25 years and growing from eight to 1000 plus employees, the manager felt that HP was behind competitors like Dell and IBM in having enough presence and leverage to really force the government to change labor practices or law.¹¹

There were slightly mixed messages received on whether local country laws are the standard or whether there exist higher and more consistent HP standards. One manager claimed that there is a global HP approach to treating all employees within their sphere of influence, with local law being relied on for only a few things, like pay and benefits. Yet another manager's understanding was that local law is the standard, and that documents like the Global Citizenship objectives, which claim to rely on local laws, also include some general standards that are likely above the standard of law in some of the countries in which they operate. An example of this would be 'discrimination on grounds of sexual orientation' - this is not a widely or globally understood concept, yet HP has it in their Global Citizenship policy. Ultimately there was some lack of clarity on how certain HP managers are about the standards they maintain. HP's Personnel Policy & Guidelines (PPG) is designed to provide the basis for decisions affecting HP personnel worldwide. HP's PPG are global in their application with some local variation based on local law and custom. It supports the decentralized organizational structure of the company by allowing local entity decision making, while still recognizing HP's dual objective of maintaining consistent treatment for its employees and complying with applicable legal requirements in the jurisdictions in which HP operates.

Recommendations for the UN Global Compact

There was a lot of discussion within HP of the UN Global Compact as being symbolically good for HP and fitting with their brand identity and commitment to global citizenship, but beyond that, it has little impact on how HP conducts its business. The managers interviewed felt that HP was already far beyond what the UNGC compels them to do.

¹¹ Interview with country Human Resources Manager, HP Malaysia

It seems that the value of the Global Compact for this, and perhaps for other North American companies, remains relatively unclear and largely symbolic. Perhaps further work, segmented by geographical areas, needs to be done to ferret out the clear value of the UNGC for segments of signatories, particularly in those regions in which the signatories are fewer. In fact, HP has already led in this direction, together with Pfizer. They organized a meeting in April, 2003, bringing together North American companies, both UNGC signatories and non-signatories, to discuss the UNGC and its usefulness and place within North American business. The Global Compact seems to serve best as a starting, or early point, for companies who are newer to the practices and strategy of corporate citizenship and issues therein.

Recommendations and Next Steps for HP

The following recommendations are relevant to HP's protection of brand identity as a leader in global citizenship, and are consistent with HP's public, consistent, and historical commitment to it. At this stage, they are leading the high tech industry with their Global Citizenship strategy and policy, and the industry has not had the intense scrutiny around human rights by NGOs that the apparel industry has, but there is belief inside the company that the risks and penalties of lack of human rights performance are very high, given what Nike and others have been through. HP can also increase its achievement of the principles of the Global Compact and the UDHR (in relation to which HP has stated its intention to respect as part of the Global Compact and as part of its Global Citizenship Policy).¹²

HP has a corporate culture that values 'doing the right thing', which is traced back to the original quote by David Packard in 1942. While this way was spoken about time and time again by each and every manager interviewed, this valuable manner of thinking about the impact of HP's business cannot be relied upon *alone* to achieve appropriate levels of human rights performance, particularly in this world of high-paced growth and mergers and acquisitions. It seems improbable that the newly acquired Compaq employees can fully embrace the "HP way" without more systemic and explicit standards and policies. While the four major policies do exist within HP, they could be better integrated into and aligned with the overall Global Citizenship strategy and framework. Across the company there is a need to:

1. Identify and prioritize the human rights issues that are most likely to arise across the company's operations;
2. Educate employees and management in the identification of these human rights issues; and
3. Work to develop framework guidance on how to deal with the issues.

¹² HP's Global Citizenship policy, 17 July 2003, <http://www.hp.com/hpinfo/globalcitizenship/>

The HP tradition of 'doing the right thing' means that the company already operates with an eye towards the ethical and responsible dimensions of their work. This places HP in a perfect position to combine that commitment to ethics with education on human rights and guidance on how to handle the issues in order to strengthen their human rights performance by achieving a greater level of consistency across the various operations and locations. It is also risky to rely on the 'HP way' in a post-merger time when now 40% of the company are not pre merger HP employees, but rather came over from Compaq. The 'HP way' at this stage needs to be more explicitly stated and systemically measured for individual employee comprehension and performance.

HP should allocate responsibility for human rights across the company to a high level manager, or team of managers. More study is needed to understand who is doing this currently and what the best practices of this model might be. This will allow a comprehensive assessment to be made of HP's current human rights performance, identifying and prioritizing for HP the best way of addressing outstanding issues, and allowing the development of company-wide policy performance objectives and implementation plans. Such a company-wide approach is presently lacking in HP and is needed to ensure that human rights are consistently addressed throughout the company's operations. It would also help facilitate awareness-raising within HP and allow the sharing of information and good practice among various parts of HP. Importantly, a centralized approach will allow a fast, comprehensive, consistent response to any human rights incidents that do arise. Such a next step is crucial to moving HP's commitment to human rights, as embodied in its Global Citizenship policy, into a living part of HP operations. It is imagined that, given HP's preference for decentralized structures, this company-wide activity would involve the close co-operation of regional and other managers as well as employees and would be best implemented by those close to the ground with a tangible understanding of the priority issues in their area.

HP should investigate how to strengthen its dual objective of maintaining consistent treatment for its employees and complying with applicable legal requirements in the jurisdictions in which HP operates.

This would include looking at timing and issues where there may be conflicts with local law and custom. This is already the practice in the privacy field where we understand arguments relating to the benefit of consistency and the ethics of providing the same level of protection to all regardless of their location were successful.¹³ While an approach based solely on compliance with national laws may be valid for other considerations, it is not sufficient in achieving an adequate level of human rights compliance. Many countries have implemented laws that do not meet the standards required under international human rights law for the realization of particular human rights for members of their population. Other countries have no law at all on some human rights issues. The

¹³ Interview with Chief Privacy Officer

reasons for an absence of adequate law at the national level are many and may include pressure on governments of developing countries to attract and retain international investment, as well as historical and cultural factors.

HP is actively implementing internal and external monitoring systems for its supply chain systems. In addition to expanding the scope of issues considered by the supplier code of conduct, as discussed earlier, in order for this system to form an effective method for monitoring the human rights performance of suppliers it will need to evolve from the early self-assessment focused model to a model based on more effective compliance monitoring. HP's efforts in this regard are welcome.