Hexagon Supplier Code of Conduct

As the owner of world-class brands in highly demanding sectors, Hexagon knows the value of reputation and why responsible business is essential to strong financial performance and to a successful future. The strength of Hexagon’s reputation is based not only on our own conduct, but also on the behavior of those with whom we do business. Accordingly, Hexagon will work only with suppliers and subcontractors (“Suppliers”) that share Hexagon’s values and commitment to ethical business practices. This Supplier Code of Conduct (“Code”) is intended to communicate Hexagon’s minimum requirements for the standards and business practices of Hexagon’s Suppliers.

Applicability of this Code: Compliance with this Code, or other agreed equivalent standard, is a mandatory qualifying condition for Hexagon to enter a business relationship with Supplier. The requirements set forth in this Code are not intended to replace the terms of any contract between Supplier and a Hexagon company. Rather, the requirements in this Code are intended to supplement the terms of any such contract(s). If a contractual term is stricter than this Code, the Supplier must meet the stricter contractual requirement.

Ensuring Compliance with this Code: Supplier must have adequate management systems and controls in place, commensurate with the size and nature of its business, to ensure compliance with this Code. To the extent applicable, Supplier must ensure its own suppliers agree to adhere to standards comparable to those set forth in this Code. Supplier must ensure that its personnel and those of its suppliers are adequately trained on the requirements of this Code. Hexagon reserves the right to verify compliance with this Code using mechanisms including, but not limited to, self-assessments, surveys, site-visits or audits.

Code Violations: If Supplier fails to comply with this Code, Hexagon will engage with Supplier and take appropriate corrective action. Supplier’s significant or recurring breaches, without corrective actions and remedy, or lack of cooperation, could result in Hexagon’s reduction or termination of business with Supplier.

Responsible Business Practices and Ethics

Supplier must comply with all applicable laws, regulations, and standards in every country in which it operates. Supplier is also expected to conduct its business in an ethical manner and to act with integrity, to include the following:

Anti-Corruption: Supplier must not engage in, endorse nor tolerate any form of bribery or corruption. Supplier must not, directly or indirectly through a third party, promise, authorize, offer, give, or accept any form of improper benefit to or from a third party, public or private, with the purpose of obtaining or retaining business or preferential treatment.

Supplier must accurately document all transactions with Hexagon or related to Hexagon business in Supplier’s records and in all documents provided to Hexagon. Supplier must not enter into any side agreements or establish or maintain any undisclosed or unrecorded fund or asset related to any Hexagon transaction.

Antitrust and Fair Competition: Supplier must comply with applicable antitrust and fair competition laws. Supplier must not participate in a cartel, or in bid rigging, price fixing, trading in information, money laundering, theft of trade secrets, improper influencing, or making false or misleading representations. Supplier must respect Hexagon confidential and proprietary information and intellectual property rights.

Conflicts of Interest: Supplier must avoid all conflicts of interest or situations giving the appearance of a conflict of interest, and must promptly notify Hexagon of an actual or potential conflict of interest involving Hexagon.

Personal Data: Supplier must comply with all applicable laws and regulations relating to the collection, use, distribution, destruction and other processing of personal data (i.e. data about an identified or identifiable individual).

Trade Compliance: Supplier must comply with all export, re-export, and import laws and regulations, and all trade controls, applicable to Hexagon business and products, including sanctions and embargoes prohibiting business with specific countries, parties, or for specific purposes.

Supplier must not procure products for Hexagon from countries subject to trade sanctions or from suppliers that are listed in connection with a trade sanctions programme or other list of proscribed individuals or entities in violation of applicable law.

Conflict Minerals: Supplier must take reasonable efforts to avoid use in its products of raw materials that directly or indirectly finance armed groups who violate human rights. Supplier must undertake reasonable due diligence with its supply chain to
identify and document the source of origin of the minerals contained in the products provided to Hexagon, and respond to Hexagon inquiries regarding existence of conflict minerals in Supplier products.

**Human Rights and Fair Labour Practices**

Supplier is expected to conduct its business in a manner that respects human rights, and complies with applicable employment laws and internationally recognized human rights standards, including the following:

**Discrimination, Harassment and Abuse:** Supplier must treat all employees with dignity and respect. Supplier must prohibit employment discrimination on the basis of age, colour, nationality, race, religion, political or union affiliation, sex, sexual orientation, marital status, pregnancy, medical condition, disability, or any other factor as established by law. Supplier must respect its employees’ rights to freedom of association and collective bargaining, including the right to form and join trade unions and other worker organisations, without harassment or interference. Supplier must not subject its employees to harassment or abuse.

**Child and Involuntary Labour:** Supplier will not engage in human trafficking, or use forced, involuntary, or child labour in any form.

**Working Hours and Compensation:** Supplier must comply with legally mandated work hours for its employees. Supplier compensation and benefits, including for overtime hours, must meet the requirements of local laws and applicable local or industry standards. Supplier must pay wages and salaries on time and pursuant to all agreements.

**Health and Safety**

Supplier must provide a safe and healthy working environment for its employees, in compliance with applicable occupational health and safety laws and regulations and international standards. Supplier must implement measures to minimize the causes of accidents and injury at Supplier’s facilities or resulting from Supplier’s operations. Supplier must provide its employees with appropriate health and safety information and training, including, but not limited to information on risks to which they are exposed, and correct handling and marking of chemicals and machinery.

**Environmental Protection**

In its operations, Supplier must:

- comply with environmental laws, regulations and directives, including those regulating hazardous materials, air and water emissions, and waste;
- obtain and maintain all required environmental permits and registrations;
- limit the use of natural resources by minimising consumption of materials and maximising recycling;
- manage materials that may pose a threat to the environment, such as chemicals, batteries, and waste water, to ensure safe use, handling, and disposal;
- utilise safe and environmentally friendly installations in Supplier’s manufacturing processes;
- integrate sustainability considerations into product development, design and production processes; and
- promote energy efficiency in buildings, production plants and performance of services.

**Raising Concerns**

Supplier is expected to promptly notify Hexagon of any violation or suspected violation of this Code by reporting the matter to your Hexagon business contact. If this is not appropriate, Supplier can report the matter to Hexagon’s compliance team via email at compliance@hexagon.com, or directly via telephone, text or email to Hexagon’s Chief Compliance Officer. Hexagon prohibits retaliation against persons reporting a potential or actual violation in good faith. The integrity of the reporting process is taken very seriously, and as such, your identity as the individual reporting the suspected violation will, wherever possible, not be revealed to local-level personnel.