HEXAGON

Supplier code of conduct

Ensuring an ethical and sustainable supply chain

Version 7 | July 2025



Our commitment



At Hexagon, innovation shapes everything we do—and integrity guides how we do it. We believe technology has the power to drive progress, but only when built on a foundation of ethical conduct, transparency, and responsibility.

To deliver sustainable, data-driven solutions that improve industries and lives, we rely on strong, values-aligned partnerships. Our suppliers are essential to this mission. We expect and support you as our suppliers in upholding high standards of ethics, compliance, and accountability.

Hexagon's Supplier Code of Conduct outlines the standards we uphold and the principles we expect our suppliers to follow. It is grounded in internationally recognized frameworks—such as the UN Global Compact—and covers key areas including human rights, fair labour practices, environmental responsibility, and zero tolerance for corruption. These are not just expectations; they are shared commitments that enable long-term, responsible growth for all.

We are also committed to developing supplier relationships that promote innovation, continuous improvement, and shared value creation.

We believe in working together to build resilient supply chains that advance both business goals and societal progress.

By partnering with Hexagon, you join us in shaping a smarter, safer, and more sustainable future—built on trust, collaboration, and integrity your partnership and commitment to doing business the right way.

Core values

Customer-focused
We know our customers' success is paramount to our own, and we are dedicated to driving efficiency, productivity and quality for everyone we serve.

Entrepreneurial
We're confident we have what it takes to achieve our ambitious vision. We take ownership in dreaming big, trying new things and pushing for progress.

Engaged
We seek personal fulfilment by doing great work while enjoying what we do. We lead with a sense of urgency, without prejudice or politics.

Professional
We are honest and ethical professionals who understand the importance of knowing our business, leading by example and demonstrating humility along the way.

Innovative
We invest heavily in innovation to meet our customers' ever-changing needs, with laser-like focus on creating sustainable businesses that benefit humanity.

Sustainably profitable
We value sustainable profitability, performance over procedure, setting measurable goals and working collectively to achieve our financial targets.

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Words denoting a specific gender within this policy are intended to apply equally to all employees without regard to gender.

1. Putting the supplier code into practice



1. 1 Why we have a Supplier Code?

The strength of Hexagon's reputation is based not only on our own conduct as described in the **Hexagon Code of Business Conduct and Ethics ("Code")**, and on the behaviour of those with whom we do business. Hexagon seeks to positively impact the environment by acting sustainably and addressing environmental challenges through its supply chain. Accordingly, Hexagon will only work with Suppliers that share Hexagon's values and commitment to ethical business practices. This Supplier Code of Conduct is intended to communicate Hexagon's minimum requirements for the standards and business practices of Hexagon's Suppliers.

1. 2 Who must follow this Supplier Code?

To ensure that Hexagon's Suppliers adhere to our strict standards, all Suppliers must comply with the Supplier Code. Suppliers must also comply with all applicable laws, regulations, and standards in every country in which they operate. Further, Suppliers are expected to conduct their business in an ethical and sustainable manner and to act with integrity. Violations of the Supplier Code or actions by Suppliers that could bring Hexagon's reputation into disrepute may jeopardize a Supplier's business relationship with Hexagon up to and including termination.

Furthermore, Hexagon reserves the right to conduct audits to verify the Supplier's adherence to the Supplier Code of Conduct at any time, with or without giving prior notice and as detailed herein. These audits may be conducted by Hexagon, or a designated third party with expenses covered by Hexagon. The Suppliers, when asked, shall provide all the resources and evidence which are needed to conduct the audit. In the event of a breach of this Supplier Code of Conduct, the Supplier shall compensate Hexagon for all associated audit expenses.

1. 3 How the Supplier Code works

Hexagon expects its Suppliers to share this commitment and to agree to follow the Supplier Code through verification, which means acting with the highest standards of ethics and in compliance with all regulatory and legal requirements and recommended practices.

The verification of the Supplier Code is also part of Hexagon's Supplier selection and approval process. In addition, Hexagon does not just expect Suppliers to implement these standards in their own company, but to also implement and verify them in their own supply chains.

These requirements are to serve as a minimum standard and are not intended to supplant any stricter terms set forth in any contract(s) or any legal requirements. If a contractual term is stricter than this Supplier Code, the Supplier must meet the stricter contractual requirement.

1. 4 Governance and enforcement

This Supplier Code has been approved by the Hexagon AB (publ) Board of Directors and is annually reviewed and re-adopted by the Board and Executive Management. Hexagon has a global team of compliance professionals empowered with investigation and enforcement of this Supplier Code, violations of which may include, but are not limited to, ceasing or reducing business with non-compliant Suppliers.

1. 5 Revisions to this Supplier Code

Hexagon closely monitors the political and regulatory environment, industry trends in relevant markets in the countries in which Hexagon operates, and regularly adapts this Supplier Code to address relevant developments, as well as changes in Hexagon's business operations. This Supplier Code is subject to change upon posting on Hexagon web pages, without prior notice.

2. Responsible business practices and ethics

2. 1 Integrity in business transactions

Corruption is the abuse of entrusted power for private gain. Hexagon does not tolerate corruption in any form. We comply with all applicable anti-corruption laws and regulations in the countries where we conduct business and expect the same from our suppliers.

Suppliers are required to conduct due diligence to prevent and detect corruption in all business dealings, including partnerships, hiring, joint ventures, and third-party engagements. They must prohibit, and may not condone or tolerate, any form of corruption, extortion, disloyalty, or embezzlement. Offering, soliciting, or accepting bribes or any other unlawful payments is strictly prohibited. Additionally, suppliers may not provide gifts or gratuities to Hexagon employees for personal gain.

Facilitation payments—small bribes intended to expedite government actions—are strictly forbidden.

Suppliers must not enter into any inappropriate side agreements or establish or maintain undisclosed or unrecorded funds or assets related to any Hexagon transaction. Furthermore, they must avoid all conflicts of interest, including situations that give the appearance of a conflict. Any actual or potential conflicts involving Hexagon must be promptly disclosed, including those arising from cooperation between the supplier, Hexagon, and the chain of production or service for Hexagon. When acting as a supplier to a governmental authority, all applicable local regulations must be fully understood and followed.

Suppliers must also ensure that their employees receive training on ethical business practices to reinforce compliance with anti-corruption and fraud prevention policies.

At Hexagon, integrity and transparency are core values of our business.

To uphold these principles, suppliers must:

- Maintain accurate and complete records.
- Foster a culture of accountability.
- Report fraud promptly to Hexagon.

For further guidance, see the **Hexagon Anti-Corruption Compliance Programme Summary.**

2.2 Competitive fairness

Suppliers are expected to act fairly in competition and to comply with applicable anti-trust or fair competition laws. Suppliers must not participate in cartel behaviour, which includes bid rigging, price fixing, and reduction in output, and Suppliers must not engage in money laundering, theft of trade secrets, improper influencing, and/or making false or misleading representations.

For further guidance, see the **Hexagon Anti-Competition Compliance Programme Summary.**

Suppliers must respect Hexagon's confidential and proprietary information, as well as its intellectual property rights. Suppliers must ensure that sensitive data and the intellectual property rights of their business partners are appropriately secured.

2.3 Conflict minerals

Suppliers must ensure that products supplied to Hexagon do not contain conflict minerals and/or that their derivatives have not originated from conflict regions that directly or indirectly finance or benefit armed groups, or who violate human rights. Suppliers must undertake reasonable due diligence within their supply chains to identify and document the origin of the minerals contained in their products provided to Hexagon. Suppliers must comply with all applicable laws and regulations and respond to Hexagon's inquiries concerning the existence of conflict minerals in Supplier products. For further guidance, see the **Hexagon Conflicts Minerals Policy**.



2.4 Trade compliance

Numerous export and customs laws and regulations impact Hexagon's operations. Suppliers must comply with all export, re-export, and import laws and regulations, and all trade controls, including sanctions and embargoes prohibiting business with specific countries, parties, or for any other specific purpose. Suppliers are expected to provide Hexagon, free of charge, with the applicable product related export control classification numbers, harmonized system numbers, country of origin and any other information reasonably requested by Hexagon. Further, Suppliers shall avoid sourcing products and services from sanctioned parties and territories.

For further guidance, see the **Hexagon Trade-Export Compliance Programme Summary**.

Suppliers are expected to provide Hexagon with any information or documentation supporting the application of customs procedures.

For further guidance, see the **Hexagon Trade-Customs Compliance Programme Summary**.

2.5 Data privacy and security

Hexagon respects the privacy of individuals and is committed to compliance with all applicable data protection 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). We expect our Suppliers to process personal data in a transparent manner and only for legitimate purposes.

Suppliers must have appropriate industry standard data handling policies, procedures, and standards in place and provide such materials to employees in the form of training. All Suppliers and the third parties with whom they conduct business should have, at a minimum, the following procedures in place to guard against the loss or unauthorized exchange of information: (i) proper management of component sourcing, inventory controls, software and firmware security, and counterfeit mitigation; (ii) proper management of Supplier's digital infrastructure from network security, encryption, patch and vulnerability to incident response management and reporting; (iii) ensure the protection of physical assets, both in transit and at the manufacturing facility, by means of access controls, documentation, and other related procedures; (iv) incorporate information and physical security into Suppliers' overall operations, including but not limited to maintaining proper certifications, hiring practices, security training, and especially when processing Hexagon's personal data (v) proper personal data breach management and assistance in privacy obligations, including but not limited to management of data subjects' requests.

Suppliers must immediately notify us of data breaches and security incidents in connection with Hexagon business.

For further guidance, see the **Hexagon Data Protection Compliance Programme Summary.**

2.6 Effective complaint mechanism

Supplier must provide an effective complaint mechanism for their employees to report possible violations of this Supplier Code to the Supplier. Supplier must investigate complaints using a reasonable degree of diligence, the results of which should be communicated to Hexagon where practicable and appropriate. Supplier must protect whistle-blower confidentiality and prohibit retaliation.

In addition, misconduct can also be reported via **Hexagon's Speak-up Reporting System**. This system is operated by a third-party supplier on Hexagon's behalf and provides several options for secure reporting, is available at all times and in multiple languages. All reports are exclusively handled by Hexagon. The Speak-Up Reporting System can be used for submission of anonymous reports.



The Hexagon Speak-up Reporting System is staffed 24 hours a day, 7 days a week, 365 days a year by an outside firm experienced in handling sensitive calls. Interpreters are available. Callers may report anonymously, and no attempt will be made to identify them. Anonymous callers should know, however, that it is sometimes more difficult to follow up on issues raised anonymously.

2.7 Reporting: How to Raise Concerns

Hexagon is committed to upholding the highest standards of compliance and ethical conduct, making it essential that any potential compliance violations are promptly reported. All third parties (contractors, suppliers, and business partners) are encouraged and required to report any suspected non-compliance with this Code, Hexagon's Code of Conduct, or applicable laws.

Reports may lead to internal reviews, investigations by public authorities, or other necessary actions; therefore, you should only report information you believe to be true to the best of your knowledge. Those who report suspected violations in good faith are protected from retaliation or any adverse consequences when working with Hexagon, though suppliers found to have knowingly made false accusations may face contract termination. Hexagon takes the integrity of the reporting process seriously, ensuring that all reports and the identity of the reporter are handled with strict confidentiality and shared only with relevant parties responsible for further investigation.

To report suspected misconduct, you have several confidential options:

Email: Send your report to Hexagon's compliance team at **compliance@hexagon.com** or contact Hexagon's Chief Compliance Officer directly.

Face-to-Face Meetings: You may raise concerns in person with the division you work with, your regional compliance officer, any Hexagon manager, or relevant employees in the human resources, finance, or compliance departments.

Ethics & Compliance Reporting System: Reports can be submitted through **Hexagon's Speak-up Reporting System,** operated by an independent third-party provider. This system allows for secure, confidential reporting at any time and in multiple languages. Anonymous reports can also be submitted through this platform.

Hexagon's Speak-Up Reporting System

3. Responsible treatment of people

Suppliers are expected to respect human rights within their companies, treat their employees fairly and with respect and comply with applicable employment laws and internationally recognised human rights standards.

3. 1 Fair treatment

Suppliers are expected to have a diverse and inclusive work environment and ensure equal treatment of their employees regardless of skin colour, age, gender, race, nationality, ethnicity, social background, disabilities, sexual identity and orientation, marital status, political or religious views and offer them better and equal employment opportunities.

Suppliers are expected to treat their employees free from sexual harassment, sexual abuse, corporal punishment, torture, mental or physical coercion and verbal abuse or other abusive conduct. Suppliers shall not retaliate towards their employees in any manner in response to an employee's good faith efforts to comply with this Supplier Code.

3. 2 Prevention of involuntary labor, child labor and protection of indigenous peoples and marginalised communities

Hexagon does not engage in human trafficking or exploitation or tolerate forced or involuntary labour in any form. Hexagon does not import goods tainted by slavery or human trafficking. Hexagon does not allow or tolerate child labour in our supply chain. Suppliers are expected to avoid any form of child labour in their companies. A "child" is anyone under the legal working age in their location or under the age defined by the International Labour Organization Convention 138 (ILO), whichever is higher. Workers under 18 must be protected from hazardous work or work that could harm their health, development, or well-being and pursuant to applicable laws. More information regarding child labour is described in the United Nations Global Compact.

Supplier has a responsibility to be vigilant towards human trafficking in its business and in its activities with its third-party vendors. Where acts of human trafficking are identified, Supplier personnel must promptly report such concerns and the Supplier's management is expected to act upon them.

Beyond this, Hexagon expects its Suppliers to respect the rights of minorities, migrant workers and indigenous peoples.

For further guidance, see the **Hexagon Anti-Human-Trafficking Policy.**

3.3 Diversity, inclusion, harassment and abuse

It is expected that the equal treatment of all employees is a basic principle of Suppliers' company policies. Hexagon encourages Suppliers to create an inclusive and supportive work environment and to respect diversity when selecting their employees and sub-contractors.

Further, Suppliers must treat all employees with dignity and respect. Suppliers should respect their 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 intimidation. Suppliers must not subject their employees to harassment or abuse.

For further guidance, see the **Hexagon Diversity, Equity and Inclusion Policy** and the **Hexagon Unfair Discrimination and Harassment Policy**.

3.4 Working hours, wages and other benefits

Suppliers must comply with legally mandated work hours for their respective employees. Suppliers´ compensation and benefits including overtime hours and holidays must meet the requirements of local laws and applicable local or industry standards. Hexagon expects Suppliers' employees to receive remuneration in line with applicable laws and Suppliers ensure an appropriate standard of living.



4. Environment, health and safety

Suppliers are expected to provide a safe and healthy work environment in their companies, in compliance with applicable occupational health and safety laws and regulations and international standards. Furthermore, it is expected that Suppliers act in an environmentally conscious and resource-conserving manner. Suppliers should ensure quality in their business processes. All required permits, licences and registrations must be obtained and kept up to date.

4.1 Respect of environment

Suppliers are expected to engage in the development and use of climate-friendly products and processes to reduce power consumption, carbon footprint and greenhouse gas emissions. Suppliers are encouraged to develop best practices around responsible business and strive for environmental consciousness in their internal operations, supply chain and social engagements while improving their own environmentally sustainable footprint.

Furthermore, Hexagon expects that its Supplier will not directly or indirectly take part in forced evictions or unlawful taking of land, forests or waters. Hexagon encourages its Suppliers to be certified ISO 14001 or to implement equivalent management systems.
For further guidance, see the **Hexagon Environmental Policy.**

4. 2 Health and safety

Each 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. Suppliers are expected to protect their employees from any chemical, biological and physical hazards and unreasonably physically demanding tasks in the workplace, as well as from risks associated with any machinery or equipment used by their employees. Suppliers must provide appropriate controls, safe work procedures, preventative maintenance, and necessary technical protective measures to mitigate health and safety risks in the workplace. Suppliers must provide trainings to ensure employees are educated in Health and Safety matters.

Furthermore, Suppliers are expected to have good security practices across their supply chains. Suppliers should maintain processes and standards that are designed to assure the integrity of each shipment to Hexagon from its origin through to its destination and all points in between.

5. Responsible supply chain management

Hexagon's compliance policies regarding supply chain management are set out in the **Code** (see section 1.1 above) and in various Compliance Programme manuals and procedures. This Supplier Code defines the framework for a responsible supply chain management.

All suppliers are expected to assist hexagon in enforcing this supplier Code of Conduct and are responsible for communicating the principles contained in this supplier Code of Conduct to their employees, subsidiaries, affiliates and subcontractors.

Hexagon selects Suppliers based on an assessment of the overall competitiveness of the offering and if they live up to the goals and values expressed in the United Nations Global Compact's 10 principles in the areas of human rights, labour rights, environmental impact and anti-corruption.

Hexagon's sustainability efforts are a natural, integrated part of its operations and core values. Hexagon believes that its sustainability journey is determined both by the role its products and solutions play in the market, as well as its own processes and actions and therefore impacts in the whole value chain.

For further guidance, see the annual **Hexagon Annual Sustainability Report.**

5.1 Hexagon supplier's qualification

Hexagon strives to ensure that its Suppliers follow the principles set forth in this Supplier Code. Compliance with this Supplier Code, or other agreed equivalent standards, is a mandatory qualifying condition for Hexagon to enter a business relationship with a Supplier.

Hexagon´s Suppliers are expected to implement management systems to facilitate compliance with all applicable laws within their companies and to promote continuous improvement with respect to the expectations set forth in this Supplier Code. Non-compliance may result in the termination of the supplier relationship.

Hexagon will provide suppliers with the necessary information and training to support their understanding and adherence to the principles in this Supplier Code

5.2 Hexagon supply chain management

Hexagon is committed to routine supplier risk assessments and sustainability supplier audits in order to achieve adherence to ethical, environmental and sustainable standards from a long-term perspective.

The policies related to supply chain management include requirements for: (i) screening Hexagon Suppliers against applicable sanctions lists; (ii) conducting additional due diligence investigations into Suppliers that may be developing Hexagon business; (iii) including appropriate anti-corruption and other compliance provisions in Supplier agreements; and (iv) prohibiting the acceptance of items of value or other benefits by Hexagon's employees while knowing or suspecting that it is offered or provided with an expectation that a business advantage will be provided by Hexagon. Additionally, Hexagon will not purchase from Suppliers that procure products originating from sources subject to applicable trade sanctions.

Audit schemes and processes differ by division, depending on risk levels and operational contexts. Hexagon has adopted a systematic evaluation process for all new Suppliers that contains several steps of scrutiny to ensure compliance with Hexagon's policies.

5.3 Continous sustainability improvement

Suppliers are expected to continuously improve their sustainability performance by implementing appropriate measures. They are expected to maintain accurate and complete records of its business dealings in line with the law and applicable technical and professional standards.

Suppliers are also expected to implement processes to identify, determine and manage risks in all areas addressed by this Supplier Code and with respect to all applicable legal or regulatory requirements.

Further questions

For any questions regarding this Supplier Code or other Hexagon compliance policies, please contact:

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Re-adopted by the Board of Directors:
July 2025



Hexagon is the global leader in measurement technologies. We provide the confidence that vital industries rely on to build, navigate, and innovate. From microns to Mars, our solutions ensure productivity, quality, safety and sustainability in everything from manufacturing and construction to mining and autonomous systems.

Hexagon (Nasdaq Stockholm: HEXA B) has approximately 24,800 employees in 50 countries and net sales of approximately 5.4bn EUR.

Learn more at hexagon.com.

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