



HEXAGON

Code of business conduct and ethics

Doing business the Hexagon way





A message from our CEO

At Hexagon, our mission is to put data to work to enable autonomous, connected ecosystems that boost efficiency, productivity and quality for our customers. We are inspired by a future where data is autonomously leveraged so that business, industry and humanity sustainably thrive.

To build and maintain a successful business and continue serving our customers, we must all uphold a steadfast commitment to always doing the right thing. This commitment should guide everything we do as a company, reflecting our dedication to making a positive impact around the globe. We must uphold the highest ethical standards in every aspect of our business while ensuring full compliance with all applicable laws and regulations. These standards must be applied to our suppliers and business partners to preserve trust with all stakeholders, whether customers, governments, investors, other representatives or you – our employees.

As embodied by one of our core values, we are honest professionals who understand the importance of knowing our business, leading by example and demonstrating humility along the way. As we strive to exemplify this professionalism in all we do, it is crucial that we abide by this Code of Conduct to set the standard, as it contains the principles of our approach to ethics and compliance. As a Hexagon employee, it is important that you understand and apply these principles in your daily work. For it is up to each and every one of us to bring this Code of Conduct to life.

Please do not hesitate to turn to our compliance team for advice and support if you are ever in doubt about what to do. I ask you to read through this Code carefully and to act at all times in the best interests of Hexagon.

Thank you for exemplifying Hexagon's values and taking pride in making a positive difference.

Core values



Profit-driven

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



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 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.



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.

Table of contents

1 Our commitment	4
2 Putting the Code into practice	
2.1 Why we have a Code	4
2.2 Who must follow this Code	4
2.3 How the Code works	5
2.4 Roles and responsibilities	5
2.5 Special responsibility of all Hexagon managers to set the appropriate tone	6
2.6 Revisions to this Code	6
2.7 How to raise concerns	6
3 We ensure an ethical workplace	
3.1 Diversity, equity and inclusion	7
3.2 Discrimination, harassment and victimisation	7
3.3 Involuntary and child labour	8
3.4 Adequate compensation	8
3.5 Freedom of association	8
3.6 Health and safety	8
3.7 Working hours	8
4 We secure our data and assets	
4.1 Intellectual property	9
4.2 Information security	9
4.3 Privacy and protection of personal data	10
4.4 Responsible use of artificial intelligence	10
5 We do the right thing	
5.1 Conflicts of interest	11
5.2 External activities	11
5.3 Fair competition	12
5.4 Corruption	12
5.5 Trade compliance	15
5.6 Taxes	16
6 We operate sustainably	17
7 We foster appropriate communication and record keeping	
7.1 Financial reporting	18
7.2 Keeping accurate records	18
7.3 Inside information and reporting obligations	18
7.4 Representing Hexagon or publishing Hexagon-related information	19
8 Living our values	19



1. Our commitment

As a world-class technology company, Hexagon understands the value of reputation and sustainable business practices and their direct correlation to strong financial performance and a successful future. The strength of Hexagon’s reputation is built on the ethical conduct and integrity of our employees and other representatives. As such, Hexagon requires, above all, that all personnel respect and comply with the laws, rules and regulations in the countries where Hexagon operates. However, this commitment extends beyond just legal compliance — it reflects Hexagon’s responsibility as a market leader to uphold the highest standards of ethics, integrity and sustainability.

The Hexagon Code of Business Conduct and Ethics is based on OECD Responsible Business Conduct. Hexagon adheres to the [United Nations Global Compact](#) principles on human rights, labour conditions, the precautionary principle and responsibility concerning the environment and anti-corruption.

2. Putting the Code into practice

2.1 Why we have a Code

Determining the right thing to do when faced with a decision is not always clear. This Code of Business Conduct and Ethics (‘Code’) can help by outlining Hexagon’s expectations and requirements for activities performed on our behalf. It serves as a central guide for daily decision-making, with all referenced documents forming an integral part of the Code.

2.2 Who must follow this Code

This Code applies to Hexagon AB, its subsidiaries and joint ventures over which Hexagon AB exercises management control (collectively, ‘Hexagon’, ‘us’, ‘our’ and ‘we’). The Code applies to all individuals employed by or engaged to provide services on behalf of Hexagon, including Hexagon’s full-time, part-time and temporary employees, officers, directors and contract workers (for ease of reference throughout this Code, referred to as ‘personnel’ and ‘you’).

Anyone who works on Hexagon’s behalf, including suppliers, agents, dealers, consultants and other business partners, must share Hexagon’s commitment to ethical business practices by following the principles of our Code when providing goods and services to Hexagon or acting on our behalf. As a condition to working with us, business partners in Hexagon’s supply chain must agree to comply with the principles in [Hexagon’s Supplier Code of Conduct](#) or other equivalent standards.

To help employees adhere to the principles outlined in this Code, the compliance team offers ongoing training sessions.

2.3 How the Code works

All personnel must read and follow this Code, along with additional Hexagon policies applying to their roles. You should apply this Code not only to the letter, but also abide by the spirit behind its content. If, for example, you are confronted with a situation for which this Code does not provide guidance, the following questions can help you make the right decision:

- 1. Is it legal, ethical and fair?
- 2. Would it embarrass Hexagon or harm Hexagon’s reputation if it became publicly known?
- 3. Would a customer, colleague, shareholder or other Hexagon stakeholder approve of it?
- 4. Would you feel comfortable telling your family about it?

Failure to comply with the Code may result in civil and criminal liability as well as disciplinary action, up to and including termination of employment or contract.

If you are unsure of how to apply the Code, please consult your immediate supervisor or a member of Hexagon’s compliance team.

2.4 Roles and responsibilities

This Code has been approved by the Hexagon AB Board of Directors and is annually reviewed by the Board and Executive Management.

Hexagon maintains its decentralised management structure so that the talent and experience of all personnel are utilised for the benefit of customers and shareholders. This means that day-to-day operational responsibilities belong to the individual divisions and organisation units that form Hexagon. The president/highest-ranking manager of each division is therefore responsible for setting up the communication channels, processes and local procedures needed to ensure compliance with this Code.

To support these obligations, Hexagon has established a global team of compliance professionals. Hexagon’s compliance team is responsible for managing Hexagon’s Ethics & Compliance System under the direction of Hexagon’s Chief Compliance Officer.

Our success depends on each of us accepting personal responsibility for doing the right thing. It is the responsibility of all Hexagon personnel to understand and comply with the Code. Employees who violate the law or the Code are subject to disciplinary action, which could include termination of employment. Additionally, legal action may be taken, and the consequences are not limited solely to the termination of employment. If you have any questions in regard to the Code, please consult your immediate supervisor or a member of Hexagon’s compliance team



What if

There is a conflict between our Code and the laws where I work?



Although we do not expect that any such conflicts exist, the best approach would be to follow and abide by whichever is the stricter standard towards ethical conduct, and then reach out to the compliance team for guidance.

2.5 Special responsibility of all Hexagon managers to set the appropriate tone

Every Hexagon manager must ensure personnel are fully aware of the Code and take steps to promote and monitor compliance with the Code and other Hexagon policies applicable to personnel. They are expected to maintain a two-way line of communication and encourage employees to ask questions, make suggestions and report wrongdoing. Managers are expected to act in a manner that exemplifies the principles set forth in the Code.

2.6 Revisions to this Code

Hexagon closely monitors the political and regulatory environment and industry trends in relevant markets and in the countries where Hexagon operates, and regularly adapts this Code to address relevant developments as well as changes in Hexagon’s business operations.

2.7 How to raise concerns

It is important that Hexagon obtains knowledge of possible compliance violations. Therefore, all personnel are encouraged and required to promptly report any incidents of non-compliance with this Code or applicable laws. Your report may result in internal inquiries, investigations by public authorities and other consequences. For this reason, you should report only what you believe to be true to the best of your knowledge. Personnel who report suspected compliance violations in good faith will be protected and will not face retaliation or any disadvantage or negative consequences at Hexagon. However, employees found to have knowingly made false accusations may be subject to disciplinary action, which could include termination of employment. The integrity of the reporting process is taken very seriously, and as such, information provided, and the reporter’s identity will be handled in confidentiality and only shared with the parties responsible for further examination of the report. Hexagon provides various ways for personnel and external stakeholders to confidentially report any suspected misconduct. You can submit reports in written and oral form, and you can also report and raise concerns in a face-to-face meeting.

Depending on the nature of the issue, concerns can be raised with your division or regional compliance officer, any Hexagon manager, or with applicable employees of Hexagon’s human resources, finance or compliance departments. Reports can be submitted to Hexagon’s compliance team via email at compliance@hexagon.com, or directly to Hexagon’s Chief Compliance Officer.

In addition, you can report misconduct via [Hexagon’s Ethics & Compliance Reporting System](#). Operated by a third- party supplier on Hexagon’s behalf, the system offers multiple secure and confidential reporting options, available 24/7 in multiple languages. All reports are handled exclusively by Hexagon, and anonymous submissions are also supported.

For more information, please visit the FAQ section here: [FAQ](#)



The Hexagon Ethics & Compliance 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.

What if

I suspect someone is violating our Code, but I’m not absolutely sure. Should I keep my concerns to myself or investigate further to confirm before reporting?

No, if you suspect a violation of our Code, it is better to say something and report a potential problem than to wait and risk harm to others or Hexagon. A person ‘acting in good faith’ means coming forward with information that they believe to be true, even if it turns out they were mistaken after investigation. Our compliance team handles investigations of credible reports of potential non-compliance.

3. We ensure an ethical workplace

Hexagon conducts its activities in a manner that respects human rights as set out in The United Nations Universal Declaration of Human Rights and supports the International Labour Organisation (ILO) labour standards. Furthermore, Hexagon seeks to build a culture of respect for human rights within our operations, with our suppliers and among our business partners.

3.1 Diversity, equity and inclusion

Hexagon promotes a diverse workplace and seeks to actively recruit, continually develop and retain talented people of different backgrounds, culture, origin, age, gender, race, ethnicity, religion, disability and sexual orientation. We strive to foster an inclusive culture where all personnel are to be treated with equal respect and will have an equal opportunity to contribute fully to Hexagon’s success based on their individual skills and interests.

For further guidance, see the [Hexagon Diversity, Equity and Inclusion Policy](#).

3.2 Discrimination, harassment and victimisation

Personnel will not discriminate against, harass or victimise any colleague, business associate, job applicant, customer, service provider or member of the public. Hexagon has a zero-tolerance policy against such practices whether based on age, ancestry, skin colour, marital or civil partnership status, pregnancy or maternity, medical condition, mental or physical disability, national or ethnic origin, race, religion, belief, political or union affiliation, sex, sexual orientation or gender identity, or any other factor as established by law.

Employment-related decisions based on any of these factors are improper and will not be tolerated.

For further guidance, see the [Hexagon Unfair Discrimination and Harassment Policy](#).





What if

I heard an allegation that one of our suppliers may be exploiting its workers and doesn't follow applicable wage laws. Should I report it?



Yes. Our compliance team would work with the appropriate supply chain managers to investigate and take any necessary action if your report is proven to be true.

3.3 Involuntary and child labour

We do not engage in human trafficking or exploitation, or tolerate forced or involuntary labour in any form. We do not trade goods tainted by slavery or human trafficking. We will not employ underage children or forced labourers. We prohibit physical punishment or abuse.

Hexagon has a responsibility to be alert to human trafficking in its business and in its activities with third-party vendors and suppliers. Where acts of human trafficking are identified, Hexagon personnel are expected to report such concerns and management is expected to act upon them.

For further guidance, see the [Hexagon Anti-Human-Trafficking Policy](#).

3.4 Adequate compensation

Hexagon pays wages and salaries on time and in compliance with applicable laws in every country in which we operate. We do not accept recruitment fees or related costs to be charged to, or otherwise borne by, employees.

3.5 Freedom of association

Hexagon recognises the rights of employees to form, join, and be active in trade unions and employee representative bodies in accordance with national laws, collective bargaining agreements, and local customs, without harassment or intimidation.

3.6 Health and safety

Hexagon strives to minimise the risks of accidents or illness among its personnel. Hexagon is responsible for maintaining a safe work environment by implementing all legally mandatory health and safety rules and practices within each Hexagon facility.

As part of creating a safe workplace, employees are not permitted to be under the influence of drugs (including inappropriate use of lawful medications), controlled substances or alcohol while at work. Drugs and alcohol can impair your ability to do your job and may put other employees at risk.

3.7 Working hours

Hexagon strives to ensure fair working hours among personnel. Working hours are not to exceed the maximum set by law. Workers should be entitled to at least one day off every seven days (or equivalent).



4. We secure our data and assets

Hexagon has a wide range of assets, including physical assets, proprietary information and intellectual property. We are responsible for safeguarding all such assets entrusted to us. Further, Hexagon expects these assets to be used in an ethical and responsible manner. When necessary, Hexagon will take appropriate action to protect its assets against loss, theft, waste, damage or misuse. No personnel shall make improper use of Hexagon, customer or supplier resources or assets or permit others to do so.

4.1 Intellectual property

We are committed to protecting our intellectual property, which includes our trademarks, copyrights, software code, trade secrets, patents, concepts, designs and business processes. As with confidential information, we expect you to protect our intellectual property and only use it or disclose details about it in accordance with the relevant guidelines. Further, all personnel are expected to respect the intellectual property rights of third parties.

Hexagon is committed to preventing the introduction of counterfeit materials into our products. All personnel are expected to use reasonable efforts to source materials and components manufactured by or for the original component manufacturers or from their authorised distributors.

4.2 Information security

Data protection and cybersecurity are important areas of focus for Hexagon. Hexagon takes appropriate technical and organisational measures designed to protect its business operations and systems from data breach incidents and cyber-attacks, and to respond and recover effectively in the event such incidents should arise.

All personnel are responsible for protecting confidential information relating to Hexagon, its products and operations, including financial results, business and market strategies, business plans, business processes, technology and systems. Personnel are also responsible for protecting third-party confidential information in Hexagon's custody or control, or otherwise accessible to personnel within the scope of their responsibilities for Hexagon.

Personnel are bound by confidentiality obligations, which remain in force regardless of their employment status with Hexagon.

Hexagon's communications system and infrastructure may only be used for legitimate business purposes or as authorised by management. In order to promote safety, prevent possible security violations and manage the communications system, Hexagon has the right to monitor, in accordance with applicable law, its electronic information systems and their use by personnel.



What if

In doing research on the internet, you find free 'cracked' software to a tool that you need to use only once to create a presentation for your supervisor. Should you use it?



No, as a technology company and good citizen we respect the intellectual property rights of others as we expect will be done to us. We do not abuse or misuse the IP of any third party.



4.3 Privacy and protection of personal data

Hexagon respects the privacy of individuals and is committed to comply with all applicable data protection laws and regulations. Accordingly, Hexagon’s Data Protection Compliance Programme establishes a common minimum data protection standard based on the EU General Data Protection Regulation (GDPR) principles that apply to the processing of personal data. A governance organisation headed by a Group Privacy Officer, and overseen by the Chief Compliance Officer, is responsible for driving the Hexagon data protection compliance strategy.

Hexagon respects the rights of individuals and is committed to cooperate with the competent data protection authorities in an adequate manner and report personal data breaches without undue delay.

Hexagon implements privacy by design and privacy by default principles while developing products and solutions. In line with our commitment to the accountability principle, we have adopted key policies and procedures such as Data Breach Management, Subject access Requests, Privacy notices and Data Protection Impact Assessments (DPIAs).

For further guidance, see the [Hexagon Data Protection Compliance Programme Summary](#).

4.4 Responsible use of artificial intelligence

Hexagon is committed to the ethical and responsible use of artificial intelligence. Hexagon ensures that all AI technologies are developed and deployed in alignment with our core values of corporate responsibility, transparency, and compliance with applicable laws and regulations. We implement rigorous oversight to prevent biases, protect privacy, and ensure the security of our AI systems. Additionally, we promote continuous education and awareness among our employees regarding the ethical implications of AI, fostering a culture of integrity and accountability.

Hexagon is committed to:

- Develop an AI governance strategy to encourage AI use and comply with the AI Act.
- Map out AI systems used in high-risk areas as defined by the AI Act.
- Raise awareness and AI literacy among the employees and others using AI on Hexagon’s behalf, considering their knowledge, experience, and the context of AI use.

Additionally, Hexagon has adopted AI guiding principles, which are outlined in our Generative AI Usage Policy. This policy describes best practices for using such tools.

Hexagon’s AI guiding principles ensure that AI is used responsibly by keeping humans central, protecting privacy, promoting transparency and inclusivity, ensuring accountability, and fostering sustainable outcomes.

For further guidance, see the [Hexagon AI Policy](#).

What if



A family member works as a salesperson for a company that I think might be able to supply higher-quality and less expensive components to Hexagon than our current supplier. Can we use their company?



Maybe. Always disclose to the person responsible for making purchasing decisions any close relationship you have with any of our suppliers and any potential conflict of interest to the compliance team. Each situation will be reviewed according to its own circumstances.

5. We do the right thing

Hexagon is committed to creating value by delivering long-term profitability and sustainable competitiveness, which can only be achieved by doing business responsibly. Responsibility is about conducting business in a way that wins the trust of customers, personnel, suppliers, shareholders and local communities. Hexagon conducts business responsibly and in compliance with the legal requirements of the countries in which we operate and expects the same from our partners.

5.1 Conflicts of interest

All business-related decisions must be made based on the best interests of Hexagon, rather than on any personal or other considerations or relationships.

All personnel are expected to avoid any situation that could create actual or potential conflicts between the interest of themselves or others and those of Hexagon.

A conflict of interest can arise in a number of situations, such as where a Hexagon employee (directly or through a relative):

- Misuses his or her position with Hexagon in a way that results in personal gain
- Has a financial interest that can affect their judgment or influence a decision
- Gains personal enrichment through access to confidential information
- Has personal interests in a Hexagon supplier or customer company

You are responsible for disclosing any actual or potential conflict of interest situation to your manager and the compliance team when the conflict situation arises. You must abide by any conditions placed on you to control or eliminate the conflict. Such conditions may include, for example, removing you from decision-making on behalf of Hexagon or putting additional controls in place to address the conflict or potential conflict.

For further guidance, see the [Hexagon Conflict of Interest Guidance](#) available on Hexagon’s Intranet: **HexNet**

5.2 External activities

Engaging in certain external activities that are not compatible with your duties to Hexagon requires the written approval of your immediate supervisor.

What if



A vendor wants to send a ‘congratulations’ card to a coworker after hearing of their promotion and has asked me for their home address. Can I share the information?



Not without the explicit consent of the coworker. By not disclosing this personal information, we demonstrate our commitment to respect the privacy of individuals and comply with applicable data privacy laws.



5.3 Fair competition

Hexagon competes fairly and in full compliance with applicable antitrust and competition laws in the countries where we conduct business. All personnel must avoid situations that can lead to unlawful anticompetitive behaviour, including in dealings with competitors, suppliers and other trading partners. These include:

- Any anticompetitive agreement or understanding
- Imposing unlawful restrictions on suppliers/distributors
- Avoiding any conduct that would constitute abuse of a dominant market position


Examples of prohibited conduct include (i) agreeing with competitors to fix prices, allocate/share markets, territories or customers, establishing production/sales quotas and/or rig bids; or (ii) engaging in any discussions with competitors on competitively sensitive topics such as pricing, costs and marketing strategies.

For further guidance, see the [Hexagon Competition Compliance Programme Summary](#).



What if

A friend who works for a competitor as a salesperson complains to you about the low prices the competitor charges, making it difficult to achieve their sales targets?



You should politely explain that you will not discuss prices with a competitor and report the incident to your manager. Generally, the antitrust laws require that each company establish prices and other terms on its own, without agreeing with a competitor, and discussions with competitors about pricing and markets shall be avoided.

5.4 Corruption

Corruption is the abuse of entrusted power for private gain. It takes many forms, including bribery, fraud, money laundering and embezzlement, and is often concealed in legitimate-looking actions. Hexagon does not tolerate corruption in any form, strives to eliminate fraud within its organization and expects behaviour with integrity from all employees.

Hexagon complies with anti-corruption laws and regulations in the countries in which it conducts business and expects the same from its trading partners. Furthermore, Hexagon has developed an anti-money laundering and combating the financing of terrorism policy aimed at diligently responding in cases of suspected money laundering.

For further guidance, see the [Hexagon Anti-Corruption Compliance Programme Summary](#), and the Hexagon Anti-Money Laundering and Combating the Financing of Terrorism Policy, available on Hexagon's Intranet: [HexNet](#).

5.4.1 Bribery

One of the most common forms of corruption is bribery, where a person offers or gives something of value (money, but also other benefits such as gifts, meals, travel and entertainment) to a person with entrusted authority for the purpose of obtaining or retaining business or securing an improper advantage.

Hexagon competes for business solely on its merits. Payments to third parties must be based exclusively on the products or services contracted and not on improper or illegal premium payments or other considerations to facilitate a transaction.

Further, Hexagon employees may not receive or give any bribes.






What if

A vendor offers me tickets to a sporting event that she can't attend. May I take the tickets?




No, the event doesn't provide any opportunity to enhance your relationship with the vendor or her company in a way that helps Hexagon, since the vendor's employee won't be attending with you.



What if

We use a sales agent to facilitate sales in a certain country. Recently, the agent asked us to increase their commission, and I suspect they intend to pass this money on to the customer's buyer. What should I do?



You should not increase the agent's commission, and you should report your suspicions to your supervisor and the compliance team.

5.4.2 Fraud

At Hexagon, we have zero tolerance for any form of fraud. Fraudulent activities, including but not limited to, misrepresentation, deceit, or any other dishonest conduct intended to secure an unfair or unlawful gain, are strictly prohibited. All employees, suppliers, and business partners must adhere to the highest standards of integrity and honesty in all dealings. Any suspected fraudulent activity must be reported immediately to the compliance team for investigation. Hexagon is committed to taking all necessary actions, including legal measures, to address and prevent fraud.

For further guidance, see the [Fraud and White Collar Guidance](#).

5.4.3 Gifts, entertainment and hospitality

In many cultures, gifts and entertainment are important for development of business relationships. However, some gifts and other benefits may unreasonably influence the recipient's decision-making or create the appearance of improper influence. Gifts of nominal value are permitted when given as a courtesy, token of regard or esteem or in return for hospitality. Entertainment is permitted when directly related to the promotion, demonstration or explanation of a product or service, performance of a contract or other business purpose. Gifts and entertainment must be reasonable, customary and lawful in the country, and accurately recorded in Hexagon's financial records.


Under no circumstances will Hexagon offer or give gifts, gratuities, entertainment or anything else of value, directly or indirectly through others, to public officials or private parties for the purpose of influencing any act or decision of such party or gaining some other advantage. In this context, the term 'public official' is defined broadly and includes government personnel, personnel of government instrumentalities and state-owned enterprises and political candidates and parties.

Personnel will not request or accept anything of value from a third party that may influence their business activity or decisions. Personnel should decline and return any gifts of more than nominal value and should only accept entertainment that is directly related to a business purpose.




5.4.4 Due diligence

Hexagon may be held responsible for corrupt conduct by third parties acting on Hexagon's behalf. Before engaging a third party that will be representing Hexagon or interacting with government agencies or other third parties on Hexagon's behalf, Hexagon must perform appropriate due diligence to determine whether the third-party is suitable to represent Hexagon.



What if

You are considering hiring a former government engineer to work at Hexagon. They are very qualified for the position. May you hire this engineer?




It depends. Many laws impose several restrictions on Hexagon's ability to hire US government employees. Before speaking with any government employee about employment opportunities at Hexagon, consult with the Hexagon compliance team to ensure compliance with applicable laws.




5.5 Trade compliance

Hexagon provides products and services around the world. As such, we must comply with all applicable trade laws and regulations, including those that relate to export controls, trade sanctions programmes, and customs procedures, and we expect our trading partners to do the same.



What if

I learned that our customer prospect intends to use our product for manufacturing military items, while formally declaring the use for civil purposes. What should I do?



Notify your export officer, as export of our products for military use in certain countries, e.g., Russia, may be prohibited or require an authorisation of export authorities.

5.4.5 Public contracting/doing business with government customers

Hexagon sells to national, state and local governments and their agencies around the world. Strict rules apply to business relations with government agencies and their officials. These rules may sometimes differ from those that apply when dealing with commercial or private customers.

Hexagon conducts its business with government agencies in compliance with these rules, including those related to procurement, lobbying, gifts and entertainment, making false claims or statements, recruiting current or former

government officials, and payment of commissions or contingent fees to third parties for assisting Hexagon to win government contracts.

Hexagon funds may not be used for political activity. Notwithstanding the foregoing, lobbying activities may be undertaken with the advance approval of the CEO.

For further guidance, see the [Hexagon Public Contracting Compliance Programme Summary](#).



5.5.1 Export control and trade sanctions programmes

If our products are found in sanctioned countries or in the possession of unauthorised end-users, government regulators may question the integrity of our internal controls, even if a third party is solely responsible for an unauthorised shipment. Export laws and regulations also may apply to third-party products that incorporate Hexagon products or that are made using technology or services from Hexagon.

Prior to the export or in-country transfer of goods, software, technology or services, Hexagon confirms that the export is lawful and does not violate an applicable economic or trade sanctions programme.

Hexagon will not export any item or provide services to any party if Hexagon knows or has reason to believe the Hexagon item will be used or retransferred in a manner contrary to applicable export control or trade sanction laws and regulations or if the party, or any other party to the transaction, is prohibited under an applicable trade sanctions programme or other list of proscribed individuals or entities.

For further guidance, see the [Hexagon Trade Export Compliance Programme Summary](#).





What if

I am asked to produce a pro forma invoice that significantly undervalues equipment to reduce customs duties?



Do not provide the pro forma invoice. Customs documents must be accurate in the description of the value and origin.

5.5.2 Customs procedures

Multiple customs laws and regulations impact Hexagon's everyday business. These laws and regulations are complex and complying with them requires significant expertise. An incorrect implementation of customs rules, by Hexagon or its agents, can create a liability for unpaid or underpaid duties, and sometimes for penalties and criminal sanctions. Furthermore, in cases where a classification, origin or valuation mistake results in a higher duty than what should have applied, the Company ends up paying more than required, which harms our business and competitiveness.

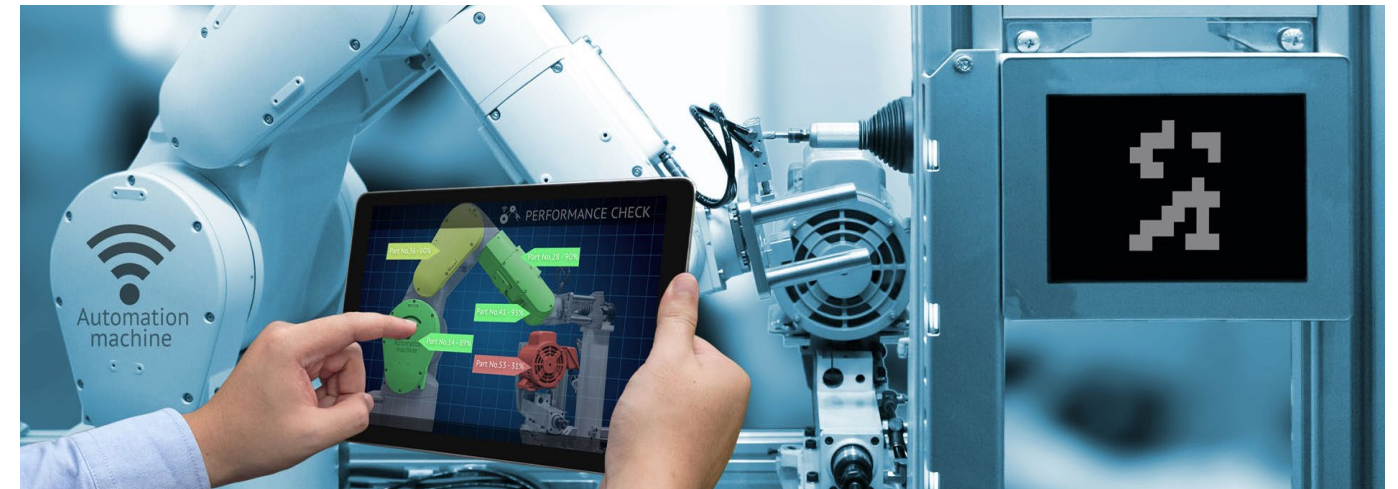
Only Hexagon personnel designated to clear imports and exports may export or import any merchandise, samples, spares, replacement parts or software by shipment, mail, courier or other means.

For further guidance, see the [Hexagon Trade Compliance Programme Summary](#).

5.6 Taxes

Hexagon complies with tax law and practice in all of the territories in which we operate. Compliance for us means paying the right amount of tax in the right place at the right time. In structuring our commercial activities Hexagon will consider — among other factors — the tax laws of the countries within which we operate with a view to maximising value on a sustainable basis for our shareholders. Any tax planning undertaken will have commercial and economic substance and will have regard to the potential impact on our reputation and broader goals. We will not undertake planning that is contrived or artificial.

For further guidance, see the [Hexagon Tax Policy](#).



6. We operate sustainably

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.

Hexagon takes a holistic approach to sustainability, which includes its environmental, social and governance (ESG) impacts in the whole value chain.

Additionally, Hexagon seeks to have a positive impact on the environment by acting sustainably and addressing environmental challenges in its internal operations and supply chain. By upholding high standards of environmental sustainability processes, Hexagon supports activities that reduce its environmental footprint, better meet customer requests, attract and retain talent, generate savings, mitigate environmental risks and fuel innovation.

Hexagon's actions include efforts to reduce greenhouse gas emissions in its operations and supply chain, increase energy efficiency and reduce waste at our facilities. In addition, we implement processes for sustainable resource management to reduce the stress of impure water and air quality from our own operations and supply chain. We are incorporating an environmental management system (ISO 14001 certification or equivalent) in our major production facilities, integrating sustainability considerations into product development, design and production processes, and creating a culture of sustainability among employees.

Accountability and governance for sustainability encompasses the entire Hexagon organisation. For further guidance, see the [Hexagon Environmental Policy](#).

7. We foster appropriate communication and record keeping

Hexagon's goal is to strike a balance to provide relevant and transparent information in its communications with all of its stakeholders, while avoiding disclosing any sensitive information that could damage the Company's competitive position or conflict with other values or obligations.

In our commitment to transparency and continuous improvement, Hexagon implement detailed reporting practices, setting clear metrics and targets to measure and communicate our progress effectively.

In its advertising and marketing communication practices, Hexagon adheres to the ethical standards applicable in the relevant markets. We follow all rules and policies regarding use of social media.

In dealings with third parties on behalf of Hexagon, all personnel are expected to make only those statements and commitments that can be honoured and fulfilled.

For further guidance, see the [Hexagon Policy Regarding the Release of External Information](#).



Hexagon Policy Regarding the Release of External Information
Available on Hexagon's Intranet: **HexNet**



7.1 Financial reporting

As a publicly listed company, Hexagon is required to follow strict accounting principles and standards and to have appropriate internal controls and processes to ensure that accounting and financial reporting complies with legal, regulatory and listing requirements.

Hexagon is committed to ensuring transparency in its financial reporting. It has a policy of full, fair and accurate disclosure to ensure that the market receives timely, comprehensive and understandable information on an impartial basis.

Comments about financial performance and prospects to external parties may only be made by an official Hexagon spokesperson.

7.3 Inside information and reporting obligations

Inside information is material, non-public information about a company that would be considered important in making an investment decision. It is illegal to use inside information about Hexagon or any other company learned through your position at Hexagon for personal financial gain or advantage. It is also illegal to disclose inside information to any party inside or outside of Hexagon who does not have a right to receive such information.

Examples of such inside information would be significant changes to earnings forecasts, business acquisitions or significant restructurings, executive management changes and important product or litigation developments. It is illegal to buy or sell securities of any company, including Hexagon’s, based on inside information.

Hexagon complies with all applicable securities laws. Personnel may not purchase or sell Hexagon securities while in possession of inside information about or relating to Hexagon. Members of the Board of Directors of Hexagon AB and Hexagon executive management must report any transactions in Hexagon securities to the Swedish Financial Supervisory Authority and to the Company.

For further guidance, see the [Hexagon Insider Policy and Guidelines](#).

7.2 Keeping accurate records

We have an obligation to follow all internal controls in recording and maintaining our company books and records. In every transaction, whether you are complying with disclosure requirements, preparing a financial statement or simply completing a time sheet, be honest, accurate and complete. Be alert for any suspicious financial transactions—know your customers and partners and understand their use of our products in order to prevent illegal activity such as money laundering. You also have a responsibility to know and follow our records retention policies. Take care and never dispose of information that may be relevant to current or threatened litigation until you are notified to do so.

7.4 Representing Hexagon or publishing Hexagon-related information

Prior written approval from a Hexagon manager is required for Hexagon personnel to represent Hexagon in an external event or discussion (including, for example, a conference, lecture, or internet forum discussion), or to publish Hexagon-related information (including, for example, on a blog or another internet forum). If granted, the individual participating in an external event should remain mindful that they represent Hexagon. Personnel can have a direct impact on Hexagon’s reputation and should remain professional at all times, displaying positivity about Hexagon and colleagues alike.



What if

In the course of my employment at Hexagon, I learned that one of our partners is about to announce new information that would be expected to greatly increase the value of its stock. May I purchase shares of the partner before the news is public?

No. This would be a conflict of interest. You may not use information acquired solely through your relationship with Hexagon for personal benefit. Using this information to purchase stock could also be insider trading. You may not buy or sell shares based on non-public information you receive about Hexagon or other companies in the course of your employment at Hexagon.

What if

I was contacted by the media about a rumoured acquisition. I have heard discussions in the office about the deal and passing along what I have heard might boost our company’s stock price. Is it a good idea to tell the reporter what I know?

No. Unless you are an official spokesperson for Hexagon, do not comment on the rumour. The information you have may be incorrect or incomplete or could even constitute material inside information and is best addressed by an official company spokesperson.

8. Living our values



It’s up to each one of us to carry out Hexagon’s values and principles in the way we do business. Thank you for making the right choice day in and day out.

We regularly review and update our policies and procedures, including this Code. Any amendments to this Code will be posted on our website. Material exceptions to this Code require written approval by the CEO and General Counsel and may require public disclosure under applicable law.

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

Tony Zana
Hexagon AB
General Counsel and Chief Compliance Officer
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Index

A

Accounting, 7.1
Adequate compensation, 3.4
Agents, 2.2; 5.5
Alcohol and drugs in the workplace, 3.6
Anti-Bribery, 5.4 Anti-Corruption, 1; 5.4
Antitrust, 5.3
Applicable Law, 2.7; 3.4; 4.2; 5.4; 8
Association, 3.5

B

Board of Directors, 2.4; 7.3
Bribery, 5.4
Business entertainment, 5.4
Business partners, 2.2
Business with government customers, 5.4
Business with relatives and friends, 5
Business records, 7.2

C

Code of conduct for suppliers, 2
Communication, 7
Communicating with the public, 7.4
Company assets, 4
Competition laws, 5.3
Compliance officer, 2.4; 2.7; 4.3; 8
Compliance team, 2.3; 2.4; 2.6; 2.7; 3.3; 5.1; 5.4
Confidential information, 4.1; 4.2; 5.1
Conflicts of interest, 5.1
Contact, 7.4; 8
Copyrights, 4.1
Corporate social responsibility and sustainability, 5; 6
Counterfeit materials, 4.1
Customs, 5.5,

D

Data privacy, 5.1
Data protection, 4.2; 4.3
Digital assets, 4
Disclosing conflicts of interest 4.1; 5; 7; 8
Discrimination, 3.2
Diversity and inclusion, 3.1
Drugs, 3.6

E

Electronic communications, 4
Employment practices, 3
Employment, 2.3; 2.4; 3.2; 4.2; 5.4
Embezzlement, 5.4
Entertainment, 5.4;
Environmental responsibility, 1; 2.6; 6
Equal opportunity, 3.1
Ethical workplace, 3
Ethics, 1; 2.1; 2.4; 2.7
Export control, 5.5
External activities, 5.2

F

Facilitation or grease payments, 5.4
Fair competition, 5.3
False accusation, 5.4
Financial books, 7.1
Financial crime, 7.2
Financial laws and regulations, 7.1
Financial reporting, 7.1
Foreign corrupt practices act, 5.4
Fraud, 5.4

G

Gifts, 5.4
Global anti-corruption policy, 5.4
Global compliance office, 2.4; 2.7; 4.3; 8
Government Customers, 5.4
Government official(s), 5.4
Global political activity, 2; 3; 5

H

Harassment, 3.2; 3.5
Health and Safety, 3.6
Hospitality, 5.4
Human resources, 2.7
Human rights 1; 3
Human trafficking, 3.3

I

Improper payments, 5.4
Inclusion and diversity, 3.1
Intellectual property, 4.1; 4.2
Internal audit, 8
Inside information, 7.3
Internal controls, 5.5; 7.1; 7.2
Intimidation, 3.5
Internal investigations, 8

K

Kickbacks, 5.4

L

Laws and regulations, 4.3; 5.4; 5.5
Letter and spirit/intent, 2.3

M

Marketing, 5.3; 7
Money laundering, 5.4; 7.2

N

Nepotism, 5

O

Outside employment, 5.2

P

Partners, 5; 7.2; 7.3
Patents and IP, 4.1
Payments, 5.4
Personal accountability, 2
Personal benefit, 7.3
Personal data, 4.3
Policy (ies), 3.2; 7.1; 8
Political, 2.6; 3.2; 5.4
Privacy, 4.3; 5.1
Public (ly), 2.3; 2.7; 5.4; 7.1; 7.3; 8
Proprietary rights, 4.1
Protection against retaliation, 2.7

Q

Quality, 3.1; 5; 6

R

Red flags, 5.5
Record management 5.4; 7.2, 18
Relative, 5.1
Reports, 2.7; 3.3; 4.3; 5.3; 7.1
Representing Hexagon, 5.4; 7.4
Respect and dignity, 7 1; 3; 4.1; 4.3; 5.1
Retaliation, 2.7

S

Sanctions, 5.5
Safe workplace, 3.6
Securities, 7.3;
Sexual-harassment, 3.2
Social media, 7
Social responsibility, 8
Sourcing and sustainability, 1; 6
Suppliers, 2.2; 3.3; 5
Supplier code of conduct, 2.2
Supplier relationships, 2.2; 5

T

Tax, 5.6
Third-party, 2.7; 3.3; 4.2; 5.4; 5.5
Trade law, 5.5
Trademarks, 4.1
Trade practices, 5.5
Trade secret information, 4.1

U

United Nations, 3
Universal declaration of human rights, 3

V

Vendors, 3.3

W

Waivers, 5.1; 5.2
Workplace safety, 3.6
Worldwide sustainability report, 6