



HEXAGON

Hexagon Internal Reporting and Investigation

Frequently Asked Questions

1. Who can report a concern?

Both Hexagon employees and third parties (i.e., suppliers, customers, freelancers, contractors, shareholders, or other individuals) may report concerns.

2. What can be reported?

Report any genuine suspicions of violations of law, Hexagon's policies and procedures, or harmful activities within Hexagon. Examples include genuine suspicions of fraud, corruption, conflicts of interest, or export and sanctions violations related to our business. Reporters are encouraged to provide with their report any documentation supporting and explaining the allegation. However, please avoid reporting operational issues such as sales or after-sales matters, issues customarily handled by direct manager, and human resources management issues. False, misleading, fake, or defamatory reports should not be submitted.

3. How to report a concern?

The following internal reporting channels are available for reporting concerns and providing relevant information:

- Hexagon Ethics & Compliance Reporting System: This web-based application is operated 24/7/365 by a third-party vendor on behalf of Hexagon and offers a secure platform for reporting in various languages, either online or by phone, with the option for anonymity. It also functions as a case management system, where all reports and investigation records are documented and stored. Should a report be received over the phone, it will be transferred to and registered within the system. Upon submitting a report, reporters receive a unique report number and are requested to create a four-character alphanumeric PIN. This PIN allows secure, anonymous online access for updates, submitting additional documentation, or requesting status inquiries. Reporters shall keep their PIN and report number confidential to maintain the process's integrity.
- Hexagon Compliance Organisation: Your Division or Regional Compliance Officer or other members of the [Hexagon Compliance Team](#) are available to receive reports. The Hexagon Compliance Organisation can also be reached via email at compliance@hexagon.com.
- Depending on the issue, reports can be addressed to any Hexagon manager, or relevant employees from Hexagon's human resources, or finance departments.
- Within the EU (European Union), if an entity employs 250 or more individuals, complaints can also be directed to local representatives of the entity for handling at the local level.
- Where mandated by applicable laws or deemed expedient and appropriate at Hexagon's discretion, an opportunity to report in person will be provided upon the reporter's request within a reasonable timeframe. To request this option, reporters shall email compliance@hexagon.com, specifying their request for an in-person meeting.



HEXAGON

You are encouraged to utilize our internal reporting channels for reporting misconduct. However, you can also report to competent authorities, where applicable, via their external reporting channels. Each sector may have specific authorities designated to handle reports of misconduct. For instance, financial misconduct might be reported to financial regulatory authorities, while labor violations might be directed to labor enforcement agencies. For detailed information on what issues can be reported and the process for initiating a report, please visit the website of the respective authority.

4. Who handles reports and what principles apply?

The Hexagon Compliance Team is the primary designated recipient of reports. Certain complaints may be redirected at their discretion, for example, to other relevant departments. When an investigation is deemed necessary, an investigation team composed of an investigator and reviewer will be assembled. In certain circumstances, an independent external investigator may be engaged to ensure the investigation process remains objective and maintains its integrity.

In addressing complaints, Hexagon adheres to the following key principles:

- Compliance with applicable laws and internal policies
- Respectful, fair, diligent, impartial, and objective case management
- Protection against retaliation
- Preservation of confidentiality and data protection
- Upholding the principle of presumption of innocence
- Protection of Hexagon's interests and operational integrity

5. What is the process for handling reports?

Hexagon's response to reports corresponds to the facts and circumstances reported. The typical process often begins with logging the report into our case management system, acknowledging its receipt within five business days, where appropriate, and conducting a preliminary assessment, all of which may occur concurrently. Depending on the findings, we either proceed with a detailed investigation or decide to close the matter. At the conclusion of any investigation, responsive actions may be taken if necessary. Updates on the investigation's progress might be provided to the reporter, if permissible and appropriate under the circumstances. All employees must cooperate with internal investigations. Once submitted, the reporter cannot withdraw their report and all subsequent actions are determined at Hexagon's discretion.

6. How does Hexagon protect reporters from retaliation?

If a reporter discloses their identity, it will be treated confidentially. The disclosure of a reporter's identity is strictly limited to situations where it is necessary for the appropriate management of the report or compliance with applicable laws. For instance, disclosure may be required when addressing the allegations is impossible without revealing the reporter's identity, particularly if the alleged misconduct is directed towards the reporter, such as in instances of harassment. Only necessary parties will be informed or gain access to the report, upholding a strict need-to-know principle. Hexagon strictly enforces a no-retaliation policy to protect any individual who reports a concern in good faith. This policy prohibits any actions that may directly or indirectly impact the reporter. Hexagon enforces these principles by reminding all involved parties of their confidentiality obligations and the no-retaliation policy. If the Compliance organisation receives any report of current or impending retaliation, it is thoroughly evaluated and addressed appropriately.

However, this safeguard does not cover individuals who abuse the system by submitting inaccurate or malicious reports. Engaging in such behavior may lead to disciplinary or legal consequences.

7. Where can I learn more about Hexagon policies and procedures?

If you are a Hexagon employee, please consult our Ethics & Compliance System at: <https://hexnet.hexagon.com/policies-and-guidelines/compliance-programme>

If you are not an employee, please refer to <https://hexagon.com/legal/compliance>