



Hexagon Anti-Human-Trafficking Policy

Adopted by the Board of Directors on 29 April 2021



As a global leader in sensor, software and autonomous solutions, Hexagon has a responsibility to uphold the highest standard of ethics and compliance in all business activities and regions in which it operates. Hexagon is deeply committed to preventing Human Trafficking in its business and supply chains, in compliance with applicable laws and regulations and respecting internationally recognized human rights standards and principles. This commitment is supported by [Hexagon's Code of Business Conduct and Ethics](#) ("Code"). Human trafficking involves the use or threat of force, position of power, fraud or coercion, or unlawful inducement of a child, to obtain some type of labour or commercial sex act ("Human Trafficking").

This Anti-Human-Trafficking Policy ("Policy") applies to all personnel employed by or engaged to provide services to Hexagon, including, but not limited to, Hexagon's employees, directors, officers, and other individuals providing services on Hexagon's behalf (for ease of reference throughout this Policy referred to as "personnel").

In case of breach of this Policy, Hexagon will engage with the breaching party and take appropriate corrective action. Significant or recurring breaches, without corrective actions and remedy, or lack of cooperation, could result in termination of employment or Hexagon's reduction or termination of business with the breaching party.

Hexagon is committed to:

- Not tolerating forced or involuntary labour in any form, and strictly forbids child labour. Hexagon personnel, contractors, subcontractors, vendors, suppliers, partners, and others through whom Hexagon conducts business must avoid complicity in any practice that constitutes Human Trafficking. This includes, but is not limited to, the following activities:
- deceiving employees or making false promises to employees during the recruitment process;
- charging any recruitment fees to employees;
- withholding employees' access to personal documents, such as passports, identity papers and travel documents;
- failing to accurately and timely pay required wages and salaries;
- confining employees in the workplace or otherwise restricting their movements;
- requiring employees to work overtime in excess of legal limits;
- requiring employees to pay any financial deposits or security fees; and
- threatening to report employees to authorities.

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 are expected to act upon them.

Hexagon's actions are:

- Implementing the Supplier Code of Conduct

This Policy is enforced within Hexagon's supply chain in the [Hexagon Supplier Code of Conduct](#) ("Supplier Code")¹. Among other principles, the Supplier Code requires applicable suppliers to comply with legally mandated work hours for its employees; provide compensation and benefits on time and in accordance with applicable laws and industry

¹ The [Hexagon Supplier Code of Conduct](#) was created and introduced in 2019 and is currently available in 19 languages on Hexagon's external website.



standards; avoid human trafficking or use of forced, involuntary or child labour; prohibit employee harassment or abuse; and respect employee rights to freedom of association and collective bargaining.

- Due Diligence, Risk Assessment and Management

Hexagon selects suppliers based on an assessment of the overall competitiveness of the offering. This assessment includes several factors in addition to financial aspects, such as competency, technology, process, management, logistics, leadership and investments in continuous improvements. Although the competitiveness of the company's offer is the most decisive factor, our aim is to give particular preference to suppliers that are in the forefront of environmental focus and work and that live up to the goals and values expressed in the United Nations Global Compact's ten principles in the areas of human rights, labour rights, environment and anti-corruption.

Hexagon's global compliance procedures require Hexagon to perform due diligence prior to engaging applicable suppliers. The nature and scope of the due diligence is dependent on identified risk factors, such as the supplier's country of origin. Additionally, Hexagon is required to perform restricted party screening on all suppliers to avoid transactions with prohibited end-users.

The Supplier Code requires applicable suppliers to have adequate management systems and controls in place, commensurate with the size and nature of their business, to ensure compliance with its terms. To the extent applicable, suppliers are required to ensure their own suppliers agree to adhere to standards comparable to those set forth in the Supplier Code. Hexagon reserves the right to verify compliance with the Supplier Code using mechanisms including, but not limited to, self-assessments, surveys, site-visits or audits. Hexagon Divisional Compliance Officers liaise with personnel responsible for Hexagon's Supply Chain to strictly enforce requirements in the Supplier Code.

- Monitor Performance Indicators

Hexagon will monitor the effectiveness of measures we are taking to prevent Human Trafficking within our business and supply chain by the number of reports, if any, received from employees, suppliers, the public, or law enforcement agencies to indicate that Human Trafficking issues have been identified.

- Training

Every Hexagon manager is required to ensure their employees are fully aware of this Policy and to take steps to monitor compliance with this Policy. Hexagon provides periodic training on Human Trafficking issues to employees with responsibilities for Hexagon's supply chain.

The Supplier Code requires suppliers to ensure their personnel, and those of their suppliers, are adequately trained on its requirements.

Raising Concerns

Any party, including personnel, vendors, suppliers, partners, and others with whom Hexagon conducts business, may report credible information regarding a violation or suspected violation of this Policy to Hexagon's compliance team via email at compliance@hexagon.com or directly via telephone, text or email to Hexagon's Chief Compliance Officer. In addition, you can report misconduct via [Hexagon's Ethics & Compliance Reporting System](#). 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. Personnel who fail to report actual or suspected Human trafficking may be deemed to be in violation of this Policy.