



Hexagon Geospatial Supplier Code of Conduct

Hexagon Geospatial ("Hexagon") is a division of Hexagon, the owner of world-class brands in highly demanding sectors; moreover, Hexagon knows and understands the value of reputation as well as to why responsible business is essential for strong financial performance and 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 their employees, agents, and subcontractors (collectively referred to as "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: Suppliers must adhere to this Supplier Code of Conduct while conducting business with or on behalf of Hexagon. Suppliers must have adequate management systems and controls in place, commensurate with the size and nature of its business, to ensure compliance with this Code. Suppliers must inform their Hexagon contact (or a member of Hexagon management) when any situation develops that causes the Supplier to operate in violation of this Code of Conduct. 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. While Hexagon's Suppliers are expected to self-monitor and demonstrate their compliance with this Code of Conduct, Hexagon reserves the right to verify compliance with this Code using mechanisms including, but not limited to, self-assessments, inspections of Suppliers' facilities, 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. Hexagon is committed to treating all workers with respect and dignity, ensuring safe working conditions, and conducting environmentally responsible, ethical operations. We expect suppliers in our operations and supply chain, and their Suppliers, to embrace the same social, environmental, and ethical responsibilities, such as (but not limited to) Information Disclosure and Cooperation.

Information Disclosure. Suppliers will accurately disclose information regarding their labor, health and safety, environmental practices, business activities, structure, financial situation, and performance, in accordance with prevailing industry practices.

Cooperation. Suppliers will cooperate with any information requests or audits we may initiate to confirm their fulfillment of these responsibilities. Though we seek to work with suppliers to improve conditions, we may terminate our relationship with any supplier that fails to meet these responsibilities.

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 honesty and integrity in business operations, including 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).

Privacy and Information Security. Suppliers will protect the privacy of personal information of everyone with whom they do business, including suppliers, customers, and workers.

Protection of Assets and Intellectual Property. Protection of intellectual property rights is vital for any company. Hexagon depends on intellectual property such as information, processes and technology. All Hexagon Suppliers must, without limitation: (1) Respect and protect the intellectual property rights of all parties by only using information technology and software that has been legitimately acquired and licensed; (2) Use software, hardware, and content only in accordance with their associated licenses or terms of use; (3) Protect and responsibly use the physical and intellectual assets of Hexagon, including intellectual property, tangible property, supplies, consumables, and equipment, when authorized by Hexagon to use such assets; (4) Use Hexagon-provided information technology and systems (including email) only for authorized Hexagon business-related purposes; (5) Hexagon strictly prohibits Suppliers from using Hexagon provided technology and systems to (i) create, access, store, print, solicit, or send any material that is intimidating, harassing, threatening, abusive, sexually explicit or otherwise offensive or inappropriate, or (ii) send any false, derogatory, or malicious communications; (6) Comply with all Hexagon requirements and procedures for maintaining passwords, confidentiality, security and privacy as a condition of providing Hexagon with goods or services or receiving access to the Hexagon internal corporate network, systems, and buildings. (7) Comply to ensure all data stored or transmitted on Hexagon-owned or Hexagon-leased equipment is to be considered private and is the property of Hexagon; moreover, Hexagon may monitor all use of the corporate network and all systems and may access all data stored or transmitted using the Hexagon network; & (8) Comply with the intellectual property ownership rights of Hexagon and others including but not limited to copyrights, patents, trademarks, and trade secrets; and manage the transfer of technology and know-how in a manner that protects intellectual property rights.

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. Supplier must 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. Suppliers will not discriminate in screening, hiring, or employment practices based on race, color, age, sex, gender, gender identity, gender expression, sexual orientation, marital status, ethnicity, national origin, caste, pregnancy, disability, genetic information, medical condition, pregnancy, religion, political affiliation, union membership, covered veteran status, body art, or any other factor as established by law. Workers' religious practices will be reasonably accommodated. Suppliers will not inquire about potential workers' criminal histories on employment applications or before initial interviews, or, if no interview is conducted, before making conditional offers of employment. In addition, suppliers will demonstrate a commitment to identify, measure, and improve a culture of diversity and inclusion through all aspects of workplace management. 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 organizations, without harassment or interference. Suppliers will not permit harassment, abuse, corporal punishment, or inhumane treatment. Suppliers will not subject workers or potential workers to unlawful medical tests or physical exams.

Accessibility. Suppliers will embed relevant web accessibility standards, innovation, and best practices to deliver inclusive products and services for our users.

Child and Involuntary Labor. Supplier will not engage in human trafficking, or use forced, involuntary, or child labor in any form. “Child” means any person under the age of 15 (fifteen), under the age for completing compulsory education, or under the minimum age for employment in the country, whichever is greatest. Workers under the age of 18 will not perform work that is likely to jeopardize their health or safety, including night shifts and overtime. Suppliers may use legitimate, properly managed apprenticeship programs, such as student internships. Unless otherwise addressed by local law, suppliers are expected to pay student workers, interns, and apprentices at least the same wage rates as other entry-level workers performing equal or similar tasks.

Freedom of Association and Collective Bargaining. Workers will be permitted to associate freely, bargain collectively, and seek representation in accordance with local laws. Suppliers are expected to permit workers to openly communicate and share grievances with management about working conditions without fear of reprisal or harassment.

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. Except in emergency or unusual situations, for suppliers’ workers paid hourly, workweeks are expected not to exceed 60 hours per week (including overtime) or, if less, the maximum set by local law. Workers should be allowed at least one day off every seven days.

Suppliers will pay legally mandated wages and benefits, will comply with the law regarding wage deductions, and will provide workers with the basis on which workers are paid via pay stub or similar documentation. Suppliers are expected not to deduct from wages as a disciplinary measure.

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.

Suppliers will integrate the following health and safety management requirements into business processes to provide workers with a healthy and safe work environment:

Occupational Safety and Health. Suppliers will comply with all applicable safety and health laws and regulations, and identify, evaluate, and control worker exposure to safety and health hazards, including chemical, biological, physical, and ergonomic stressors, through proper design, engineering controls, maintenance, safe work procedures, and ongoing health and safety guidance. Where these means cannot adequately control hazards, suppliers will protect workers with appropriate personal protective equipment and provide them with information about risks to them from these hazards. Suppliers will implement procedures to prevent, manage, track, and report occupational injury and illness, including encouraging worker reporting, classifying and recording cases, providing medical treatment, investigating cases, implementing corrective actions, and facilitating workers’ return to work.

Emergency Preparedness. Suppliers will identify and plan for potential emergencies; moreover, Suppliers will implement emergency plans and provide guidance to workers on emergency response procedures. Response procedures include emergency reporting, worker notification and evacuation, drills, fire detection and suppression equipment, exit facilities, and recovery plans.

Sanitation, Food, and Housing. Suppliers will provide workers with ready access to clean toilet facilities, potable water, and sanitary food preparation, storage, and eating facilities. If suppliers provide workers with residential facilities, those facilities will be clean and safe, with adequate personal space, entry and exit privileges, emergency egresses, heat and ventilation, and hot water for bathing and showering.

Environmental Protection

Hexagon recognizes that environmental responsibility is integral to producing world-class products. In manufacturing operations and construction, Suppliers will strive to create regenerative processes and will minimize adverse effects on the community, environment, and natural resources while safeguarding the health and safety of the public. In addition, Suppliers must comply with environmental laws, regulations and directives, including those regulating hazardous materials, air and water emissions, and waste.

Environmental Permits and Reporting. Suppliers will obtain and keep current all required environmental permits, approvals, and registrations, and follow their operational and reporting requirements.

Natural Resources. Limit the use of natural resources by minimizing consumption of materials and maximizing recycling.

Resource Efficiency and Clean Energy. Throughout their operations, Suppliers will work to reduce consumption of resources, including raw materials, energy, and water as well as promote energy efficiency in buildings, production plants and performance of services. Suppliers will track, document, and seek to minimize energy consumption and greenhouse gas emissions, and seek ways to improve energy efficiency and use cleaner sources of energy. Suppliers will utilize 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.

Hazardous and Restricted Substances. Suppliers will identify and manage materials that may pose a threat to the environment, such as chemicals, batteries, wastewater and other materials that pose a hazard to the environment, to ensure safe use, handling, and disposal. Suppliers will identify, monitor, control, treat, and reduce hazardous air emissions, wastewater, and waste generated from its operations. Suppliers will adhere to our requirements restricting use of specific substances, including labeling for recycling or disposal.

Waste Mitigation. Wastewater, Solid Waste and Stormwater Management. Suppliers will work to reduce or eliminate waste of all types. Where waste cannot be eliminated, suppliers will manage and control all waste streams to comply with applicable laws and regulations, and in an environmentally responsible and secure way; this includes, but is not limited to, preventing illegal discharges and spills from entering storm drains, and treating as required prior to discharge or disposal of all wastewater and solid waste from operations, industrial processes, and sanitation facilities.

Management System

Suppliers are expected to adopt or establish a management system to carry out their responsibilities under this Code of Conduct. The management system will be designed to ensure suppliers' operations: (a) comply with our requirements and applicable laws and regulations; (b) conform to these responsibilities; and (c) identify and mitigate operational risks related to these responsibilities. It should also facilitate continual improvement.

The management system should contain the following elements: executive level commitment and accountability; processes to identify, monitor, and comply with all applicable laws, regulations, standards, and requirements; risk management processes; communications and training for all workers and suppliers as determined by suppliers; ongoing assessments, monitoring, and continued improvement, including corrective action processes; a program that provides workers with a means to report grievances anonymously and without fear of retaliation, unless prohibited by law; and a program to ensure suppliers will continuously monitor these reporting processes, record issues raised, and take appropriate action.

When making sourcing decisions, adherence to the requirements set forth in the Supplier Code will be considered. Hexagon reserves the right to terminate a business relationship with any Supplier if any of its officers, directors or employees are found to have behaved in a manner that is unlawful or in violation of this Supplier Code. Again, a 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.

If requested, our Suppliers may be required to attend training sessions on the Supplier Code. Compliance with the Supplier Code, and attendance at any offered training sessions, is required in addition to any other obligations in any agreement a Supplier may have with Hexagon.

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.