



Conflict Minerals Policy

Introduction

Hexagon has a responsibility to uphold the highest standards of ethics and compliance in all business activities and regions in which it operates. Hexagon is committed to sourcing responsibly and respecting human rights in its own operations and supply chain, extending beyond legal compliance. The [Hexagon Code of Business Conduct and Ethics](#) (“**the Code**”) and [Hexagon Supplier Code of Conduct](#) (“**Supplier Code**”), which apply to all Hexagon employees, guides interactions with customers and suppliers and promotes these commitments.

This Hexagon Conflict of Minerals Policy (“Policy”) applies to Hexagon AB and its subsidiaries and joint ventures over which Hexagon AB exercises management control (collectively, ‘Hexagon’, ‘us’, ‘our’ and ‘we’) and 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”).

The term Conflict Mineral means columbite-tantalite (coltan, tantalum), cassiterite (tin), gold, wolframite (tungsten) or their derivatives; or any other mineral or its derivatives determined by the Secretary of State to be financing conflict in Democratic Republic of Congo or any of its adjoining country, as defined by the [Dodd-Frank Wall Street Reform and Consumer Protection Act](#).

While Hexagon does not mine, trade or source minerals directly, it may be indirectly exposed via its supply chain. Thus, identifying the use of Conflict Minerals with its suppliers is part of Hexagon’s commitment to responsible sourcing. Hexagon takes reasonable efforts to avoid use in its products of raw materials that directly or indirectly finance armed groups who violate human rights. Hexagon works together with its suppliers to manage raw materials and to increase transparency by investigating and determining the source of ‘Conflict Minerals’ in the supply chain as an important first step towards making any improvements.

Hexagon, to best of its knowledge, represents and certifies that it does not receive any materials or products containing cassiterite (tin), coltan (tantalum), wolframite (tungsten) or gold (known as “3TG minerals”) sourced from the Democratic Republic of Congo or any of its adjoining countries.

In case of any 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:

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. In order to do so, Hexagon’s personnel are expected to recognize when they potentially have, or could be perceived as having, a conflict of interest.

A conflict of interest arises when personnel place their personal interests before the interests of Hexagon and where such personal interests improperly influence or could be seen as improperly influencing their business judgments, decisions, or actions. A conflict of interest can arise in a number of situations, such as where a Hexagon employee (directly or through a relative):

- Continuously identifying which Hexagon products that may be exposed to Conflict Minerals.
- Continuously identifying suppliers that provide components and products likely to contain Conflict Minerals, and require them to, on an annual basis, complete a Conflict Minerals Report to conclude traceability of the Conflict Mineral.
- Deploying its best efforts around responsible business and due diligence measures to its suppliers where appropriate, which includes guidance on responsible sourcing of minerals.
- Ensuring that all suppliers adhere to the Hexagon Supplier Code, taking reasonable efforts to avoid use in its products of raw materials that directly or indirectly finance armed groups who violate human rights.
- Ensuring that all suppliers undertake due diligence measures within their supply chain and that they document the source of origin of the minerals contained in the products provided to Hexagon and respond to Hexagon inquiries regarding the existence of Conflict Minerals in supplier products.

Hexagon’s actions are:

- Developing and implementing a Sustainability Programme within Hexagon.
- Developing and implementing a strong supplier qualification process which includes the monitoring of Conflict Minerals in its supply chain.
- Encouraging its suppliers to use the [OECD Due Diligence Guidance](#) in order for them to determine the source and chain of custody of the Conflict Minerals in the assemblies, parts or components supplied to a Hexagon entity.
- Expecting its suppliers to respond to Hexagon inquiries regarding the existence of Conflict Minerals in its products.
- Training its suppliers on Hexagon standards in relation to sustainability including Conflicts Minerals.

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 [Hexagon’s Ethics & Compliance Reporting System](#), or misconduct can be reported via email at compliance@hexagon.com or directly via telephone, text or email to Hexagon’s Chief Compliance Officer.

Hexagon prohibits any 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 breaches of this Policy may be deemed to be in violation of this Policy.