

A photograph of a child lying on their back in a grassy field, blowing dandelion seeds into the air. The scene is captured during the golden hour of sunset, with warm light and many seeds suspended in the air. The child is wearing a white shirt and blue floral shorts.

# Code of conduct





#### VISION

**Clean air  
everywhere**

#### PURPOSE

**Driving energy  
transformation**

#### VALUES

**Integrity &  
Drive**

## **Hexagon's purpose is Driving Energy Transformation**

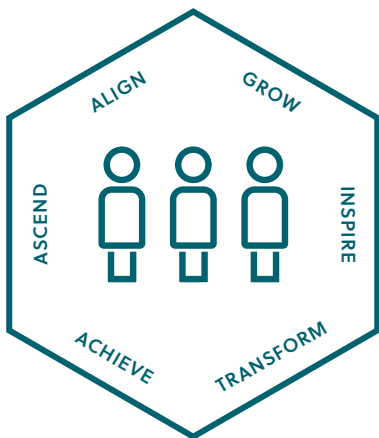
Our world leading composite cylinder technology enables the safe delivery of clean gaseous energy to homes and industries – and decarbonizes transportation on land and at sea. To date we have thousands of solutions and six decades of experience helping our customers reduce CO2 emissions.

### **Our beliefs**

We have a strong, value-based culture that drives our business performance. Our core values, integrity and drive, support our behavior and our beliefs.

Driven by a vision of Clean Air Everywhere, we believe that clean air is a right not a privilege; that technology is no longer the barrier in enabling clean energy for all; and that change is urgent.

We hold ourselves accountable for all our interactions with our customers, suppliers and owners, our people and the communities in which we operate.



# The Hexagon Way

At Hexagon, our vision, values and leadership principles create the foundation for the Hexagon Way.

Our six leadership principles, Grow, Inspire, Transform, Achieve, Ascend and Align represent the six sides of a hexagon, and describe our leadership framework. Through developing these behaviors, we strengthen our culture and equip our leaders at all levels with the skills needed to drive our mission for a clean energy future.

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## The purpose of this Code

**Our Code of Conduct provides guidance and insight into how to act in accordance with our governing principles, including our vision, purpose and values.**

### Compliance with laws and regulations

At Hexagon, we foster an organizational culture based on integrity and high ethical standards. All Hexagon employees, contractors, suppliers and business partners must comply with applicable laws and regulations in the relevant jurisdictions in which Hexagon operates or does business.

### To whom the Code applies

Compliance with the Code of Conduct is mandatory for all Hexagon personnel, including the Board of Directors, managers, supervisors, employees, independent contractors, agents, and temporary personnel, including within our subsidiaries (referred to within the Code as “team members”).

Hexagon believes that trust and respect are essential to building long-lasting relationships within our organization. Team members should uphold the highest standards of integrity, act in compliance with all applicable laws, including this Code, and operate honestly and equitably in all business relationships.

### Violations of this Code

All team members are accountable for complying with the Code of Conduct. Failure to do so may result in consequences for both the team member and Hexagon. If any team member becomes aware of any violation of the Code, the team member is required to promptly report the noncompliance.

### Additional resources

All employees should consult and review Hexagon Group’s policies, resources, handbooks and compliance programs. These are meant to supplement the Code and provide additional direction and details. Many of these resources are available online, including at <https://hexagongroup.com/sustainability/esg-resources>, while others can be accessed through internal channels. Please contact your manager if you have any questions regarding these resources.



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# Taking care of people



## Human rights

Respect for human rights is a fundamental value of Hexagon. Hexagon is strongly committed to ensuring the people, workers, and communities that support our entire supply chain are treated with dignity and respect. To Hexagon, the protection of human rights across our operations and value chain is a moral and business priority.

In addition to complying with all applicable laws and regulations, Hexagon abides by the following internationally recognized human rights covenants and conventions: (i) United Nation's Universal Declaration of Human Rights; (ii) International Covenant on Economic, Social and Cultural Rights; (iii) International Covenant on Civil and Political Rights; and (iv) International Labor Organization's core conventions.



### Our standards

- Promote protection and respect of human rights among all employees, business partners, and customers of Hexagon
- Maintain Hexagon's high ethical standards
- Contribute to the protection of human rights globally

### Your responsibilities

**All team members must comply with the following principles for human rights and working conditions:**

#### No tolerance for child labor or forced labor

Hexagon does not tolerate the use of child labor or forced or involuntary labor of any kind from any partner, supplier or third party at any level of its supply chain. Hexagon does not engage in or tolerate human trafficking or any form of physical or mental coercion, including threatened restrictions on movement, confiscation of identity documents and/or passports, withholding of wages, abusive working conditions, debt bondage or any other kind of exploitation or abuse.

#### Working hours and leave

Hexagon follows all applicable laws regarding working hours and over-time pay and conducts operations in ways that limit overtime to levels that ensure humane and productive working conditions. Hexagon complies with all requirements relating to paid time off, annual leave, sick leave, or parental leave, as required by applicable laws.

### **Wages and benefits**

Hexagon pays all its employees and workers at least the minimum legal wage. Hexagon provides its employees with benefits that comply with applicable laws and any applicable collective bargaining agreements. Information provided to workers and employees regarding wages and benefits is in a form that is easily understandable. Hexagon strives to adopt and promote wage progression structures that enable and promote career advancement.

### **Freedom of association and collective bargaining**

Hexagon respects workers' rights relating to freedom of association, collective bargaining, and peaceful assembly across its supply chain. In cases where local laws restrict the right to freedom of association and collective bargaining, Hexagon allows alternative forms of worker representation, association and bargaining, provided, however, that such alternatives comply with the requirements of the covenants and conventions listed above.

### **Policy**

[Human Rights and working conditions](#)



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## Equal opportunities / Diversity and inclusion

**Hexagon is committed to workplace diversity, ensuring equal opportunities for all, and fostering a culture of inclusion. Our core values – integrity and drive – support this mission and ensure accountability for our actions. Diversity is essential to our business, enabling better decision-making and increased value creation.**

At Hexagon, we respect and embrace different cultures, languages, customs, competencies, and ways of experiencing the world. We take pride in the uniqueness of our workforce, employing individuals of many different nationalities. We subscribe to the idea that our greatest asset is our people, and we strive to maintain the highest level of diversity and inclusion within all levels of our organization.

Our continued success depends on our ability to attract, recruit, retain and develop a diverse and highly skilled group of employees. We recognize the importance of each individual's perspective and appreciate each individual's contribution to Hexagon.

Diversity and inclusion are embedded in the Hexagon Way: Our vision, our values and our leadership principles promote diversity from the inside out.

### Our standards

Hexagon shall:

- Promote and build a diverse workforce
- Foster a culture of inclusion by respecting the dignity of all people from all backgrounds
- Embrace the benefits of diversity and inclusion so that employees use their unique experiences to create a better and more equitable work environment
- Identify and address systemic barriers that could hinder employees from reaching their full potential
- Conduct our business in accordance with the International Labour Organization (ILO) Convention on Discrimination and other internationally recognized standards

All employees shall be treated in a nondiscriminatory manner regarding, for example, wages, benefits, hiring procedures, race, religion, gender, age, education, national origin, disability, or sexual orientation. We respect and value every employee as an integral member of Hexagon. We are committed to support and develop all employees personally and professionally. The work environment shall be free from any form of harassment or bullying. We understand that our company is only as successful as every member of our team



## Your responsibilities

All Hexagon team members are expected to demonstrate their commitment to diversity and inclusion through purposeful actions every day, including as follows:

- Make diversity and inclusion a priority
- Create an inclusive environment that is free from discrimination, harassment, and bullying
- Create a working atmosphere where employees feel respected, heard, and valued for their differences and viewpoints
- Take appropriate action to address behavior that is inconsistent with Hexagon's principles of diversity and inclusion
- Focus on conscious inclusion to drive diversity, equity and belonging
- Contribute to and promote company initiatives that focus on diversity and inclusion

## Policy

[Diversity and Inclusion Policy](#)



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## Health and safety

Hexagon is committed to providing a safe and healthy environment for its employees, contractors, visitors, and anyone who may be affected by our business operations, and to protecting the environment by managing the business in an environmentally sensitive and responsible manner.

Hexagon is dedicated to prioritizing environment, health, and safety by developing and maintaining tools and procedures that equal or exceed industry best practices.

### Our standards

- Lead a **Zero Injury Health & Safety Culture** by encouraging team member input and involvement to reduce risk and eliminate workplace hazards.
- Sustain a **Zero Impact Environmental Culture** and realize our vision of Clean Air Everywhere, through innovative products and responsible business practices to protect the environment and prevent pollution.
- Advance a **Zero Impact Energy Culture**, by making efficient design, operational and procurement choices to reduce energy consumption and carbon emissions.
- Drive a **Zero Waste Operations Culture** to create an ongoing competitive advantage as a world-class manufacturer.
- Provide the necessary information and resources to achieve our objectives and support continuous improvement within all business processes.
- Ensure activities are conducted in accordance with internal procedures, as well as applicable laws, regulations and requirements.



## Your responsibilities

Team members at every level are expected to actively participate in the success of environmental, health and safety programs by:

- Complying with safe work practices.
- Wearing personal protective equipment and clothing as required.
- Complying with direction given by supervisors/management regarding environmental, health and safety.
- Engaging in continuously improving health and safety programs by individual actions and participation in safety programs and committee activities.
- Minimizing waste and emissions, reusing and recycling materials, promoting renewable energy use, and conserving energy and water wherever feasible.
- Including contractors, guests and other third parties in environmental, health and safety planning discussions.
- Reporting all accidents, incidents, hazards and unsafe work practices immediately to your supervisor, management, safety committee representative or the Hexagon whistleblower channel.

## Policy

[Environment, Health and Safety Policy](#)

## Drugs and alcohol

Hexagon is committed to a healthy and safe work environment.

A key factor in meeting this commitment is the assurance of a workplace free from drugs, illegal substances and substance abuse. Team members are prohibited from carrying, transporting, dispensing, selling, buying, offering for sale or offering to buy, illegal or controlled substances when on Hexagon premises, when driving in Company vehicles or driving personal vehicles on Company business, while attending Hexagon-related events and whenever conducting business-related activities off Hexagon premises. Exceptions may be permitted for special occasions where it could be appropriate to consume limited amounts of alcohol in office settings. Team members must act responsibly at all times at Hexagon-sponsored social activities and Hexagon-related business events both on and off Company premises. Team members should contact their human resources business partner for local laws and regulations applicable to a particular business area, as certain rules may differ by jurisdiction.



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## Our commitment to sustainability

As a provider of clean energy solutions to people and industries around the world, Hexagon plays a key role in the transition towards a more sustainable, decarbonized global society.

But no matter how noble the purpose of a company, business can have a negative impact on the environment. At Hexagon we are committed to conducting our business in an economically, socially, and environmentally responsible manner – safeguarding life, continually working to reduce and eliminate our carbon footprint, and promoting biodiversity in the ecosystems in which we operate. Throughout Hexagon's business operations, we prioritize protection of all aspects of the environment, including animal welfare, soil quality, deforestation, and noise emissions.

### Related documents

[Sustainability Policy](#), [Annual Sustainability report](#)



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**Business  
integrity**





## Anti-corruption and bribery

Hexagon is committed to carrying out business fairly, honestly and openly with no tolerance for corruption. Hexagon opposes corruption in all forms – direct and indirect, active as well as passive, between public officials and private parties, in both private and public sectors. This includes any form of corruption, such as bribes, facilitation payments, trading in influence, network corruption (nepotism) and any form of illegal kick-back. We are committed to conducting our business in accordance with the highest ethical standards.

### Our standards

All forms of bribery and corruption are strictly prohibited. This also applies to all forms of receiving or giving any improper or undue advantages such as, but not limited to cash, stocks, gifts, discounts, travels, personal benefits, favors or any other undue advantages.

### Your responsibilities

All Hexagon team members must comply with Hexagon's Anti-Corruption Policy and Guidelines. All managers and other employees dealing with governmental authorities, agents, distributors, customers, and suppliers shall annually affirm that they have read and will comply with the most recent version of the policy.

Hexagon team members should report suspected misconduct or violations of Hexagon's Anti-Corruption Policy and Guidelines to their compliance officer. Hexagon will not impose any form of retaliation against anyone making a good faith report. All reports of suspected violations will be taken seriously and will be followed up as appropriate. Hexagon shall, to the extent possible, secure the anonymity of the person reporting concern.

Facilitation payments are prohibited, and no such payments shall be made by or on behalf of Hexagon.

Gifts may only be acceptable if of modest value and not intended to gain an improper or undue advantage or influence. It shall always be considered whether the gift seems reasonable and justifiable.

Hospitality, meals, and entertainment of modest value, proportionate to the business rationale behind it, may be offered or received if it is reasonable with respect to local customs.

Hexagon team members shall never offer anything, directly or indirectly, to any public official, or anyone who has a close relationship with a public official, in return for any sort of favorable treatment. For further information, visit the Anti-Corruption Policy on the Hexagon website.

#### Related documents

[Anti-Corruption Policy and Guidelines](#)



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## Accurate books and records

**We consider accurate and objective recording of transactions and reporting of financial results essential to maintaining our credibility and reputation, and a prerequisite for meeting legal and regulatory obligations and standards.**

We provide accurate financial statements and disclosure information to the financial markets in compliance with all relevant laws and regulations, including for companies listed on the Oslo Stock Exchange. Hexagon communicates relevant business information on a timely basis to its employees, the financial market, and other external stakeholders. All material information is disclosed to relevant recipients equally in terms of timing and content.

Hexagon is committed to providing the financial markets with the necessary information, including potential material risks and opportunities, to enable investors, analysts, and other stakeholders to maintain reasonable financial forecasts. All accounting and financial information, as well as other disclosure information, is accurately documented and presented in accordance with laws, regulations, and relevant accounting standards. Our financial reporting is based on International Financial Reporting Standards (IFRS) and applied standards as described in our Annual Report.

Hexagon maintains a stringent internal control system, including an authorization structure, over its financial recordkeeping processes. We perform recurring reviews of our internal procedures to ensure and maintain the quality of our processes at all levels over time.

### Your responsibilities

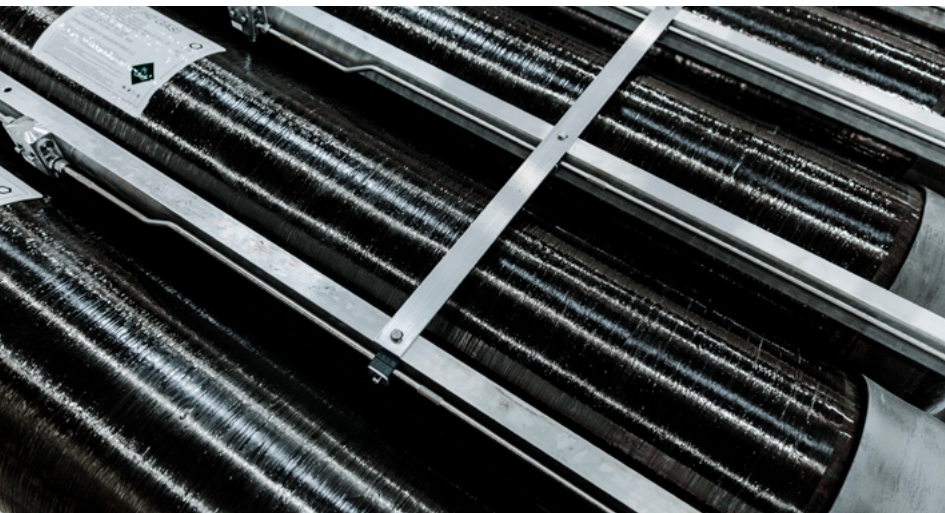
Provide full, fair, accurate and understandable disclosures in financial and non-financial reports and documents filed with tax authorities, other regulatory authorities and in other public communications.

### Related documents

[Note 2: Accounting Policies \(Annual Report 2021\)](#)



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## Conflict of interest

**Team members shall refrain from any actions that may create, or may appear to create, a direct or indirect conflict of interest between the team members' private interests and the interests they are to protect as a team member of Hexagon.**

Team members are responsible for informing Hexagon where there is a close personal relationship, which may have an impact on the integrity of decisions. A close personal relation is a parent, sibling, spouse, cohabitant, parents in law or other close relationship. If there is a close personal relationship, employees must inform their immediate manager as soon as possible. Hexagon will assess and consider appropriate steps to avoid potential conflicts of interest and breaches of confidentiality.

Employees should expect to devote all of their business time, efforts, judgment, skill and knowledge to the advancement of the business and interests of Hexagon. However, employees may serve on the board of directors of civic, charitable, educational, or other community organizations so long as such activities do not interfere with, or conflict with, their duties for, or obligations to, Hexagon or create a potential business or fiduciary conflict. Hexagon requires management approval before employees take on board positions that are time consuming or for which they will receive remuneration beyond symbolic value.

If in doubt, team members should seek guidance from superiors or their relevant compliance officer.

# Expectations to our business partners (Supplier Code of Conduct)

## Fair competition

Suppliers that do business with Hexagon must comply with all applicable fair trade, competition and anti-trust laws and regulations. Suppliers may not engage in anti-competitive discussions or enter into anti-competitive agreements, including relating to illegal price-fixing, market sharing, customer allocation or other illegal restrictive practices, at any level of the production or distribution chain.

## Conflicts of interest

Suppliers shall at all times uphold the highest level of integrity in all business interactions. Subject to applicable confidentiality and privacy considerations, Suppliers shall conduct business in an open and transparent manner, always acting as an honest and reliable partner. Suppliers shall conduct business in a way that avoids situations where private, personal, financial or other external interests conflict with their professional responsibilities.

## Data protection

Suppliers shall ensure that personal data is processed in compliance with applicable laws and subject to an adequate system to ensure appropriate protection against unauthorized or unlawful processing, loss, alteration, misuse, disclosure or other transmission. Suppliers shall have in place adequate safeguards to protect Hexagon's confidential information and intellectual property rights to prevent misuse, mishandling, counterfeit, theft, fraud or improper disclosure in accordance with applicable laws and contractual terms with Hexagon.

## International trade restrictions and sanctions

Suppliers shall comply with all applicable export control laws and regulations, including economic sanctions policies, both domestically and internationally. Suppliers shall not, directly or indirectly, export, re-export, transmit or cause to be exported, re-exported or transmitted any product, commodity, accompanying software, and/or technical data to any country, individual, corporation, organization, or entity to which such export, re-export or transmission is restricted or prohibited.

## Anti-money laundering

Suppliers shall not engage in, endorse or tolerate any form of bribery or corruption, directly or indirectly. Suppliers shall not offer or accept any form of improper or undue advantage or benefit, loan, gift, donation or other payment of anything of value, directly or indirectly, whether in case or in kind, to or for the benefit of any third party, including any political candidate, political party, government agency, other public or non-public agency, or representative for any entity, company or organization or any individual elected or appointed as an employee or officer thereof. Suppliers shall implement effective systems to ensure compliance with all applicable regulations for combating money laundering and terrorist financing.

## Related documents

[Supplier Code of Conduct](#)



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# Communication & information

Hexagon follows the Oslo Stock Exchange's recommendations for reporting investor information, and we aim to provide the market with correct, relevant and clear information. All our stakeholders should have equal access to information provided by Hexagon



## Confidentiality and public communication

Confidential or non-public information may be valuable to various stakeholders and must be managed carefully to ensure that it is not misused. It is important to Hexagon that we protect such information and maintain a consistent approach to external communication and which individuals are authorized to communicate on the Company's behalf.

### Our standards

Our communication policy is based on openness and equal treatment of all stakeholders, providing correct, clear and prompt information. Only authorized persons can make statements on behalf of the Company to media, the financial community or through Hexagon's external communications channels.

### Your responsibilities

Keep non-public information about Hexagon and its stakeholders confidential, this also applies after your employment or contract with the company has been terminated. Any requests from media or the financial community should be directed to the local Marketing and Communications team.

### Related documents

[Communication Policy](#)



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## Inside information

**Inside information is information of a precise nature, which has not been made public, and which, if it were made public, would be likely to have a significant effect on Hexagon's share price.**

Handling of inside information is strictly regulated through the Norwegian Securities Trading Act as well as Oslo Stock Exchange's rulebooks, and includes keeping the information strictly confidential. For Hexagon, examples of inside information could be major contracts, significant acquisitions, or forecasts of financial figures. Inside information is first to be made public through stock exchange announcements.



### Our standards

We maintain strict internal procedures for handling inside information in accordance with applicable regulations, which includes keeping the information confidential and making sure it is not shared with any unauthorized persons. Hexagon publishes inside information according to the stock exchange's regulations and makes it publicly available to all stakeholders at the same time.

### Your responsibilities

Treat inside information confidentially and follow up on any obligations related to holding such information, including making sure it is not shared with unauthorized persons. Never trade in Hexagon shares, or any other related companies based on non-public information. Contact Investor Relations or your manager if you have questions related to inside information or trading in Hexagon shares.

### Related documents

Primary insider manual, Oslo Stock Exchange's issuer rules, The Norwegian Securities Trading Act



# Data protection and IP



## Privacy and data protection

Hexagon is committed to safeguarding the personal data of its employees and business partners.

### Our standards

We take appropriate steps to keep personal data confidential and to protect it from misuse. We comply with all applicable privacy laws when we collect, use, and share personal information about individuals. We only collect personal information that is necessary to further a legitimate purpose of Hexagon's business. We only keep the information for as long as is necessary in accordance with applicable law and have security measures in place to protect the security and integrity of all personal data.

### Your responsibility

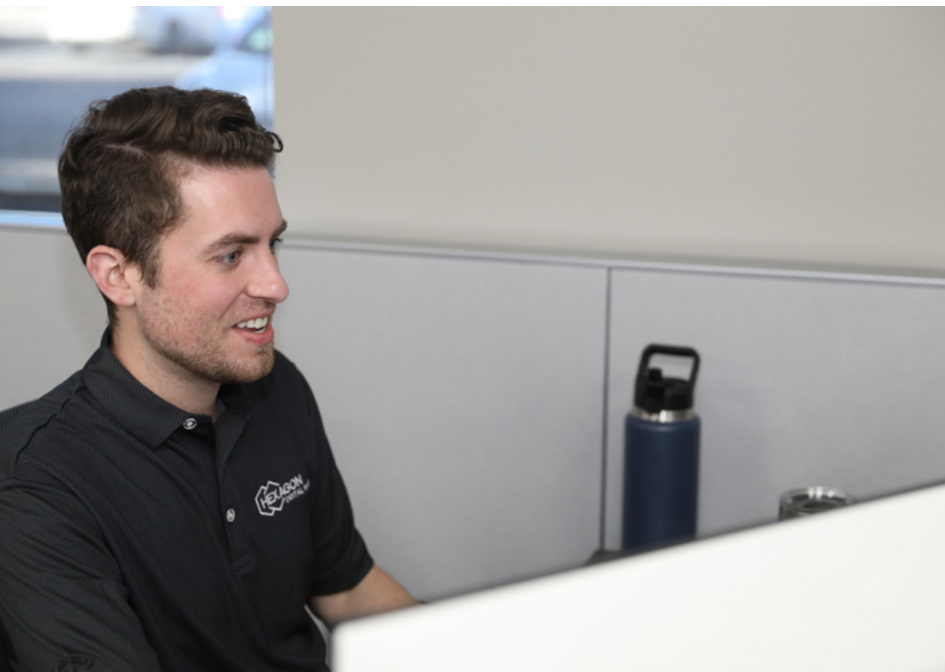
Comply with all Hexagon policies pertaining when collecting, storing, using, or sharing personal information. Only access and use personal information stored on our systems for legitimate business purposes. Maintain the highest degree of confidentiality when using personal data.

### Related documents

[Local data protection procedures, Information security and data protection policy](#)



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## Intellectual property

Hexagon's intellectual property is one of its most valuable assets. Hexagon's intellectual property includes all of the following:

- Copyrights
- Patents
- Trade secrets
- Trademarks
- Inventions
- Ideas and Innovations
- Improvements
- Software
- Discoveries



### Our standards

Hexagon take measures to protect our intellectual property rights. All of our team members are trusted to take responsibility for safeguarding our intellectual property assets against misuse, loss, damage, waste and theft.

### Your responsibility

Follow Hexagon's internal procedures and protocols regarding sharing of intellectual property with third parties. Use caution and ask a manager if you have any questions regarding the handling or dissemination of intellectual property. You cannot use any of Hexagon's intellectual property without Hexagon's prior written consent. In certain instances, Hexagon may have ownership rights to intellectual property you create or develop. You must promptly notify the Legal Department of any intellectual property that you discover, develop or create as part of your job or that relates to the Company's business.

### Related documents

IP Policy

# Reporting concerns:

## Our whistleblowing policy

### Asking questions and reporting concerns

Hexagon is committed to conducting its business with honesty and integrity at all times. We believe that transparency and good communication throughout the organization promotes a better working culture. Reports from our employees and stakeholders are our most important mechanism to uncovering and understanding when things are not as they should be at Hexagon.

### Our standard

- Encourage employees and business partners to disclose information regarding dishonest, fraudulent, or illegal behavior or activities
- Protect complainants from retaliation
- Treat all parties to an investigation in a fair and equitable matter
- Ensure confidentiality and anonymity for reporting individuals, if requested
- Take corrective and disciplinary action if wrongdoing is discovered

### Your responsibility

#### What should you report?

- It is the duty of all team members to report misconduct or suspected misconduct, including fraud, financial impropriety, corruption and bribery, money laundering or terrorist financing, environmental crimes, violations or potential violation of any applicable law or Hexagon's policies and/or procedures.
- If you see suspicious behavior, report your concern through one of the reporting channels.
- If asked to participate in an investigation, assist honestly and keep all information confidential.

#### Where/who can you report to?

- Your direct manager or other individual in management
- Your compliance officer
- The legal department
- Your HR representative
- Hexagon's independent whistleblower channel

Hexagon's whistleblower channel may be used where reporting to direct management is undesirable or difficult, or where such reports have not been handled adequately. Whistleblowers may seek advice from anyone he/she wishes. The channel gives the whistleblower the possibility to make a report anonymously. The whistleblower channel is managed by the third-party provider PricewaterhouseCoopers (PwC).

### **Protection from retaliation**

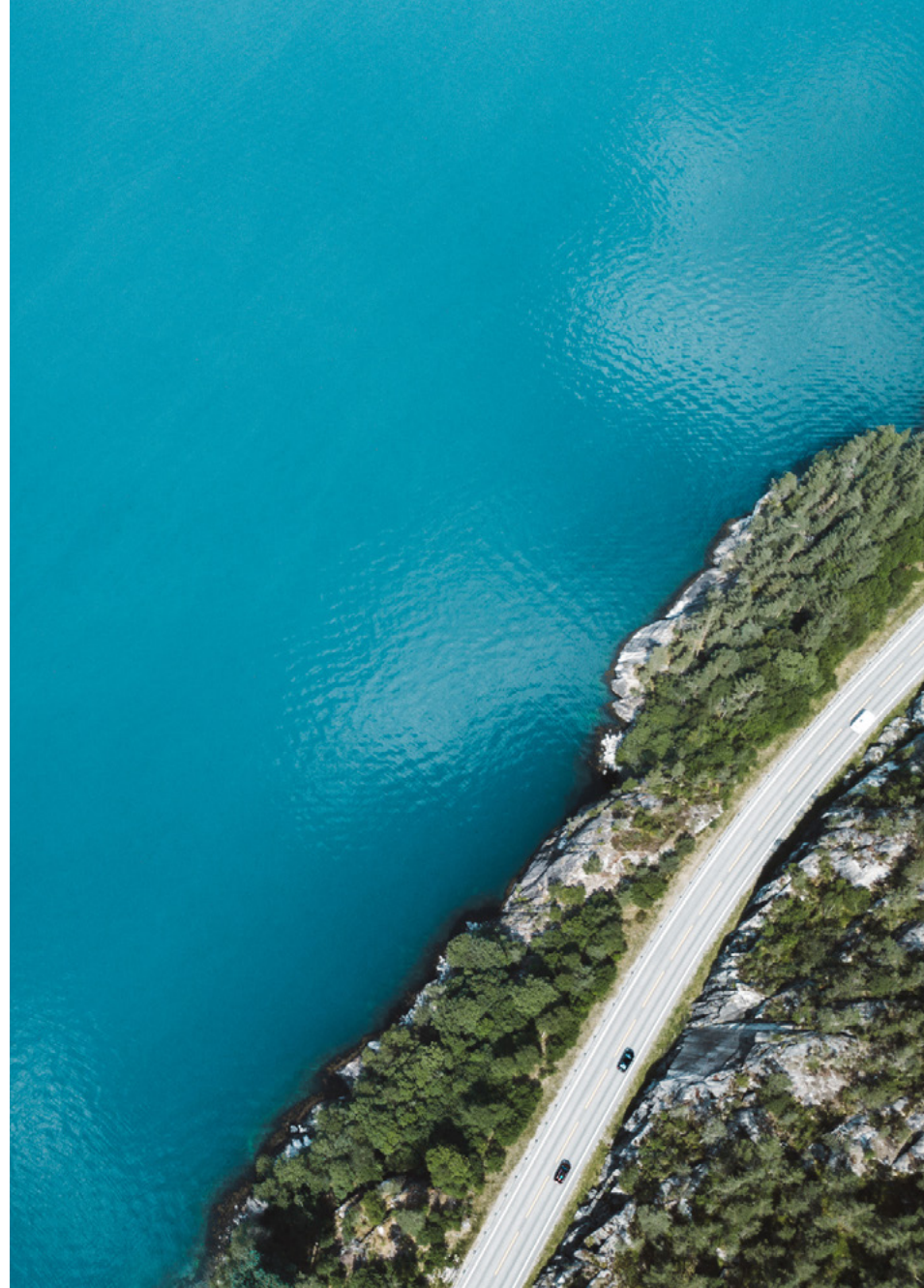
Hexagon will not tolerate any form of retaliation against employees or business partners who report suspected misconduct in good faith. Hexagon will protect whistleblowers, including respecting requests for anonymity or keeping individuals' identities confidential. Retaliation is unacceptable in all locations where Hexagon operates and will be disciplined accordingly.

### **Related document**

[Whistleblowing policy](#)



SCAN TO ACCESS THE  
WHISTLEBLOWING CHANNEL



**Contact information**

If you have questions regarding the  
Code of Conduct, please contact:

Ashley Remillard  
Chief Legal Officer  
[legal@hexagonagility.com](mailto:legal@hexagonagility.com)



[hexagongroup.com](http://hexagongroup.com)