



## Policy on Human Rights and Working Conditions

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Respect for human rights is a fundamental value of the Hexagon Group ("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 or exceeding 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; (iv) International Labor Organization's core conventions; and (v) Organisation for Economic Co- operation and Development (OECD) Guidelines for Multinational Enterprises.

## **1 Policy Objectives**

- 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

## **2 Scope**

This policy applies to all Hexagon personnel worldwide, including the Board of Directors, managers, supervisors, employees, independent contractors, agents, and temporary personnel, as well as suppliers and participants within our supply chain, anyone doing business for or with Hexagon and others acting on Hexagon's behalf. This policy applies to all locations where Hexagon conducts business, including all Hexagon facilities and offices worldwide and throughout Hexagon's operations.

## **3 Principles**

The following principles for human rights and working conditions, although non-exhaustive, are consistent with the covenants and conventions listed above and serve as the foundation for Hexagon's business operations.

### **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 overtime 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 of 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. Hexagon requires that strict control be maintained over private or public security forces, to ensure that security personnel exercise restraint and caution in a manner consistent with applicable international standards.

#### Employment security

Hexagon strives to secure employment for employees, maintain and further improve working conditions for fair and stable long-term employment, and create a workplace of mutual respect and trust. Hexagon is committed to protecting workers against fluctuations in earned income as a result of job loss.

#### Land, Forest, and Water Rights, Forced Evictions

Hexagon does not engage in or support the unlawful eviction or unlawful taking of land, forests and waters in the acquisition,

development, or other use of land.

#### **4 Supplier Compliance**

As further set forth in Hexagon's Supplier Code of Conduct, Hexagon expects all suppliers, business partners and other third parties to conduct their business in accordance with this policy, to respect human rights and to provide for acceptable working conditions throughout their supply chain. Hexagon is committed to ensuring that its suppliers comply with the internationally recognized human rights covenants and conventions set forth above, including the United Nation's charters and the International Labor Organization's core conventions. Hexagon may terminate business with partners that fail to comply with this policy and Hexagon's human rights principles. For further information, please see Hexagon's Supplier Code of Conduct, available on our [website](#).

#### **5 Due Diligence**

Hexagon is committed to understanding and addressing human rights risks that exist throughout the value chain. Hexagon performs periodic due diligence assessments of its key suppliers to identify and evaluate whether risks to human rights exist and if so, what actions must be taken to address and mitigate such risks. The due diligence methodology involves multiple steps to map human rights risks across the many countries in which Hexagon does business.

Using reputable human rights indices, Hexagon identifies suppliers located in geographic regions where a likelihood exists of a possible adverse human rights impact. Hexagon then evaluates each supplier, obtaining sufficient information and/or documentation to ensure that the supplier (and sub-suppliers, as necessary) has taken adequate measures to identify, address and remedy any adverse human rights impacts. Hexagon performs a saliency assessment based on likelihood and severity, and formulates action items as necessary to address any suppliers identified as at high risk of human rights violations. Hexagon is prepared to cease doing business with any supplier where a risk of a human rights violation is identified. Hexagon also endeavors to work with impacted stakeholders and communities to ensure human rights impacts are mitigated.

#### **6 Grievance System**

Hexagon ensures that workers have an effective mechanism to report grievances in order to facilitate open communication between management and workers. The whistleblower channel is available in four languages through Hexagon's internal channels and the Company's website. For further details, see Hexagon's Whistleblower Policy at [Hexagon | Whistleblowing \(hexagongroup.com\)](#). Hexagon expects all partners, suppliers and other third parties to commit to establishing similar reporting channels for grievances.

**Hexagon Composites ASA**

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