



SUPPLIER CODE OF CONDUCT

Hexagon Group

1 Introduction

The Hexagon Group ("Hexagon") believes that clean air is a right, not a privilege. Our core mission is to drive energy transformation through the delivery of clean vehicle solutions. Our core values – integrity and drive – support this mission and ensure accountability for our actions. Hexagon recognizes the obligations we have towards our people, investors, customers, suppliers, and the community. Our suppliers, contractors, sub-suppliers, subcontractors, consultants and business partners ("Suppliers") play a critical role in maintaining our customer's trust and ensuring the highest degree of quality in our products. This Code of Conduct ("Code") sets forth the requirements and expectations that our Suppliers must abide by when doing business with Hexagon.

Hexagon is a member of the United Nations Global Compact ("UNGC") and is committed to ensuring its business is performed in a responsible, ethical and environmentally sound manner. Hexagon conducts its business in accordance with the UNGC's Ten Principles and requires its Suppliers to do the same.

These Ten Principles, available at <https://www.unglobalcompact.org/what-is-gc/mission/principles>, are derived from internationally recognized conventions, values and standards and set forth fundamental responsibilities in the areas of human rights, labor, environment and anti-corruption.

2 General Requirements

Hexagon believes that trust and respect are essential to building long-lasting partnerships with our customers and business partners. Suppliers shall 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. Failure to comply with this Code may result in corrective measures, up to and including Hexagon terminating its relationship with Suppliers. If Suppliers become aware of any violation of the Code within their business organization or applicable supply chain, Suppliers shall promptly notify Hexagon and ensure adequate remedial measures are taken to address the noncompliance. Hexagon reserves the right to audit Suppliers to verify compliance with this Code. We encourage Suppliers and Supplier's personnel to report any violations of this Code or any other concerns through Hexagon's [Whistleblower Channel](#). Retaliation for whistleblowing is strictly prohibited.



Hexagon expects all Suppliers to commit to establishing similar reporting channels for grievances.

2.1 Oversight Management System

Suppliers must establish and maintain an oversight management system that is adequate to ensure compliance with this Code. Suppliers' oversight management system may reflect the relative size, complexity and risk associated with Suppliers' business and products. Among other things, the system should provide for training, effective risk assessment, assign responsibility to relevant personnel, and include monitoring, audit rights, and reporting mechanisms related to all areas of this Code. Suppliers shall conduct adequate due diligence and secure reciprocal commitments to ensure that all levels of the supply chain comply with the provisions of the Code. Hexagon reserves the right to monitor, assess, and verify Supplier's compliance with this Code. To support this oversight, Suppliers must provide, upon request, accurate and timely information and allow Hexagon reasonable access to relevant facilities, records, processes, and personnel. Hexagon may conduct audits, assessments, or other forms of review as needed to confirm adherence to the standards outlined in this Code.

2.2 Legal and Regulatory Compliance

Hexagon requires all Suppliers to be knowledgeable about and to comply with all applicable laws and regulations as well as the contractual terms and conditions agreed upon with Hexagon. All legally required permits, approvals, licenses, registrations, inspections and related reports must be in place, up to date and available for inspection upon request.

2.3 Continuous Improvement

Hexagon strives to provide products of the highest quality at the highest value. Continuous improvement is the foundation on which Hexagon has built its business and reputation. Hexagon is committed to continuously improving its products and operations across all levels of the organization. Suppliers must show dedication to the principles of continuous improvement, including compliance matters, and strive to seek continuous improvements in their operations and across their supply chains over time.

2.4 Submission of Environmental, Social and Governance (ESG) Information

Developing, producing and delivering products and services in a responsible and sustainable manner is critical to our core vision of Clean Air Everywhere. Our suppliers play an integral part in our sustainability journey; we will never succeed without our partners and suppliers making sustainability a top priority. Suppliers are required to complete self-assessments, questionnaires or scorecards to demonstrate their sustainability initiatives and goals. Each supplier is evaluated based on certain criteria that reflect the sustainability targets and priorities of Hexagon. Among other things, Suppliers shall provide the following information



to Hexagon as part of the Supplier evaluation process:

- Information regarding programs or policies that Suppliers have in place relating to sustainability;
- An Environmental Product Declaration (EPD) for the raw materials Supplier provides to Hexagon; if it is not possible to produce an EPD, Suppliers should provide their carbon emission factor (kg CO₂e/kg) for the materials supplied to Hexagon, as well as the preconditions used in the calculation;
- Details regarding Supplier's efforts to convert to renewable power;
- Data regarding recycling programs and efforts to reduce landfill waste; and

Information regarding programs or policies that Suppliers have in place to promote and/or protect diversity and inclusion, human rights and working conditions, anti-corruption, health and safety, or other core principles of corporate responsibility.

Hexagon recognizes that certain Suppliers may not have the foregoing information readily available to provide, as different Suppliers are in different stages of monitoring and assessing different ESG factors and metrics. Hexagon considers itself a partner with its Suppliers and will work with Suppliers to establish a strategic plan to obtain and provide such information to Hexagon over time. Enabling Suppliers to better understand and evaluate their own internal processes will benefit the industry overall and lead to more a sustainable future.

3 Business Ethics

3.1 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.

3.2 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.

3.3 Anti-Corruption

Suppliers shall not engage in, endorse or tolerate any form of bribery or corruption, directly or indirectly. This includes any form of corruption, such as bribes, facilitation payments, trading in influence, network corruption (nepotism) and any form of illegal kick-back. 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. 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. Suppliers 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. Suppliers shall not make charitable contributions and sponsorships which are or can reasonably be perceived as connected to a position, assignment or office. Suppliers shall implement effective systems to ensure compliance with all applicable regulations for combating money laundering and terrorist financing.

3.4 Data Protection, Privacy and Artificial Intelligence

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.

Suppliers must ensure that any use of artificial intelligence (AI), automated decision-making tools, or machine-learning technologies in connection with their work for Hexagon is conducted responsibly, transparently, and in compliance with all applicable laws and industry standards. AI systems may not be used in ways that compromise data privacy, intellectual property rights, confidentiality obligations, or the integrity of information provided to Hexagon.

Suppliers are expected to maintain human oversight over AI-generated outputs and to implement appropriate safeguards to prevent inaccurate, biased, or misleading information from influencing deliverables, business decisions, or representations made to Hexagon. Suppliers must not use AI tools to fabricate, alter, or obscure material facts, nor may they rely on AI to circumvent due-diligence, quality-control, or ethical-compliance requirements. Suppliers remain fully responsible for the accuracy, authenticity, and compliance of all work product—regardless of whether AI tools were used in its creation—and must disclose to Hexagon, upon request, the nature and extent of AI use in producing any materials or services.

3.5 Export Control

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.

4 Human Rights and Working Conditions

Hexagon is strongly committed to respecting human and labor rights throughout the entire supply chain. Specifically, Hexagon is committed to complying with the following 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. Suppliers must assess the potential impacts of their operations on factory and production workers, migrant and temporary workers, women, children, minorities, and local communities, and must take appropriate, proactive measures to prevent, mitigate, and remediate any adverse effects on these groups.

4.1 No Child Labor or Forced Labor

Suppliers that do business with Hexagon are strictly prohibited from using child labor or forced or involuntary labor of any kind. Suppliers must 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.

4.2 Working Hours and Leave

Suppliers must follow all applicable laws regarding working hours, wages and overtime pay. Suppliers shall conduct operations in ways that limit overtime to levels that ensure humane and productive working conditions. Suppliers must comply with requirements relating to paid time off, annual leave, sick leave or parental leave, as required by applicable laws.

4.3 Wages and Benefits

Workers must be paid at least the minimum legal wage. Suppliers shall provide employees with benefits that comply with applicable laws and any applicable collective bargaining agreements. 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, Suppliers shall allow alternative forms of worker representation, association and bargaining, provided, however, that such alternatives must comply with the requirements of the covenants and conventions referenced in this section 4. Information provided to workers and employees regarding wages and benefits should be in a form that is easily understandable. Suppliers are encouraged to adopt a wage progression structure that enables and promotes career advancement.



4.4 **Non-Discrimination and Fair Treatment**

Hexagon values the diversity of its workforce and is committed to having a safe workplace with equal opportunities for all, free from any discrimination, bullying or harassment of any kind. Suppliers must treat everyone with dignity and respect, and conduct their activities without discrimination on the basis of race, ethnicity, national or other origin, disability, age, gender, sexual orientation, language or religion.

5 **Health and Safety**

Safety is our primary goal at Hexagon. Suppliers must comply with all government and regulatory health and safety requirements and specifications. Suppliers are responsible for ensuring that their operations are conducted safely. Suppliers shall observe all safety rules and practices and follow instructions concerning safe and efficient work practices.

5.1 **Safety in the Workplace**

Suppliers shall provide their employees with a safe and healthy working environment that minimizes the incidence of work-related injuries and enhances the quality of products and services. Suppliers shall strive to create an environment that fosters consistency of production and worker retention and morale. Suppliers shall ensure that potential exposure to safety hazards, such as machines, equipment or substances, or other chemical, biological or physical agents, are identified, assessed and controlled through proper design and/or preventative maintenance and safe work procedures. Safety information shall be made available in order to educate, train, and protect individuals from safety hazards. Suppliers shall have adequate emergency preparedness procedures in place in order to identify and assess potential emergency situations. Emergency plans, fire safety and response procedures shall be implemented in accordance with applicable law.

5.2 **Product Safety**

The safety of Hexagon's products is ensured throughout the value chain. Suppliers must comply with all applicable safety requirements. Suppliers shall abide by good manufacturing practices and shall have in place appropriate quality management systems. Suppliers shall conduct all required internal and external testing, as required by applicable laws and regulations. Suppliers shall follow any changes in legislation and indications received from the market regarding product safety.

6 **Responsible Sourcing of Raw Materials and Conflict Minerals**

Suppliers shall conduct human rights due diligence to identify, address and mitigate adverse human rights impacts that may result from a business relationship. Suppliers shall comply with all internationally recognized human rights and supply chain management principles, particularly in connection with materials from conflict affected and high-risk areas. Suppliers shall exercise robust due diligence with respect to sourcing, extraction and handling of high-risk minerals, including tantalum, tin, tungsten, gold and cobalt – also



known as “3TG” or “conflict minerals.” Suppliers shall make a reliable determination of the origin and source of such minerals, with the ambition of only sourcing components with 3TG materials from suppliers validated by a third party as conflict free. Suppliers shall have a policy and process in place to ensure that the raw materials contained in Suppliers’ products do not directly or indirectly finance or benefit armed groups that are perpetrators of human rights abuses or in any other way directly or indirectly contribute to human rights violations.

7 Environmental Performance

Hexagon’s mission is “Clean Air Everywhere.” To help achieve this mission, Hexagon expects its Suppliers to actively seek to reduce their environmental footprint. Suppliers should strive to protect the environment, conserve natural resources and continuously reduce the environmental impact of their production, products and services throughout their entire life-cycle. When appropriate, Hexagon will endeavor to support Supplier initiatives that aim at improving environmental performance. The life cycle stages include acquisition of raw materials, design, production, transportation/delivery, use, end- of-life treatment, recycling and final disposal.

7.1 Resource Efficiency and Energy Consumption

Suppliers should ensure efficient and optimized use and consumption of natural resources, with particular focus on implementing conservation and recycling practices in Suppliers’ production and maintenance processes. Hexagon encourages Suppliers to utilize production practices that minimize potential environmental and health-related risks. Suppliers are encouraged to implement a comprehensive energy reduction strategy and management program while increasing the use of renewable energy.

7.2 Emissions and Waste Management

Suppliers shall continuously strive to control, minimize and to the extent possible eliminate greenhouse gas emissions and discharges of pollutants at the source or by other adequate measures. Suppliers are encouraged to control and treat wastewater and solid waste generated from their operations and industrial processes.

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