



## **Whistleblowing Policy**

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The Hexagon Group ("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.

### **Purpose of this policy:**

This whistleblowing policy has been put in place to:

- 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

### **What should you report?**

- It is the duty of all employees and business partners 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.

### What do you need to be aware of before reporting?

- An individual that reports suspicious activity is not responsible for investigating the activity or for determining fault or corrective actions. Hexagon does not expect individuals to have all the facts, to conduct investigations or to make decisions regarding alleged misconduct.
- You may report anonymously via Hexagon's whistleblower channel. Hexagon is committed to protecting the identity of individuals reporting suspicious activity.

### 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 Pricewaterhouse Coopers (PwC).

### What happens when you raise concerns?

- All reports will be handled confidentially to the extent possible to comply with applicable law and in accordance with our internal whistleblower procedures. We will endeavor to share information only with those who are necessary to properly investigate the matter.
- We will initiate an investigation of the matter reported. The length of an investigation will depend on the complexity and severity of the concern.
- To the extent matters are reported anonymously through our whistleblower channel, results of any investigation will be communicated back through the whistleblower channel; anonymity will be retained and Hexagon will not be able to contact the individual that has reported the matter.
- We will seek to be transparent about the outcome of an investigation, subject to requests for anonymity.

### How are whistleblower reports handled?

- Whistleblower reports will be handled in a fair, objective and transparent manner. All steps in the handling of whistleblowing reports will be logged, documented and stored safely in order to secure and fulfil the principles regarding confidentiality and privacy.
- In addition to the Corporate Compliance Officer, each business area has appointed a Compliance Officer, who will lead investigations of whistleblower reports pertaining to his or her business area. The investigation may involve information gathering and inquiries/interviews, as may be necessary given the specific matter at issue.

- Based on the information gathered, the Compliance Officer will prepare and provide a response to the whistleblower. If requested, parties involved will have an opportunity to rebut any factual allegations, as deemed appropriate by the Compliance Officer.

#### **Protection from retaliation:**

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

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