



Whistleblowing Policy

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. 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.
- If matters are reported anonymously, we will not be able to contact the individual that has reported the matter or to share the outcome of the investigation.
- We will seek to be transparent about the outcome of an investigation, subject to requests for anonymity.

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.

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