



Materializing Our Values

The HEXPOL Code of Conduct

Framework and Scope

People, Environment and Business Ethics

Materializing Our Values – the HEXPOL Code of Conduct – focuses on people, environment and business ethics. The Code of Conduct, Group Policies and other relevant supporting information serve as a fundamental part of the HEXPOL corporate culture – providing guidance on how business principles and values should be put into practice. It sets out the principles that govern each area and seeks to translate these core values into tangible, comprehensive guidelines. Realization of the values is a responsibility that we must jointly take by integrating the Code of Conduct into the daily work.

Based on Materializing Our Values:

- We comply with applicable legislation, regulations, international conventions and guidelines.
- We apply sound business ethics.
- We contribute to sustainable development and demonstrate commitment to the United Nation’s Agenda 2030 and its Sustainable Development Goals (SDGs)
- We practice corporate responsibility in relation to colleagues, business partners, owners and other stakeholders.
- We create long-term value for our stakeholders.

Scope of Materializing Our Values

Materializing Our Values and its associated policies covers the impact HEXPOL has on people, environment and business ethics through its own operations and its value chain – globally as well as locally. It primarily addresses material impacts, risks and opportunities based on the conducted Double Materiality Assessment of the HEXPOL business.

External Principles and Frameworks

Materializing Our Values is primarily based on the Ten Principles of the UN Global Compact and the International Guideline for Social Responsibility (ISO 26000). HEXPOL recognizes and respects:

- [The fundamental principles of Human Rights, as defined by the “Universal Declaration of Human Rights” \(UN\)](#),
- [United Nations’ Guiding Principles on Business and Human Rights](#),
- [The Children’s Rights and Business Principles by UNICEF, the UN Global Compact and Save the Children](#),
- [The eight core conventions defined in the Fundamental Principles of Rights at Work \(ILO Declaration\)](#),
- [OECD Guidelines for Multinational Enterprises on Responsible Business Conduct](#),
- [The planetary boundaries defined by Stockholm Resilience Centre](#),
- [The Paris Agreement and its goal to limit the rise in global surface temperature to well below 2°C above pre-industrial levels, aiming for 1.5°C](#),
- [The Kunming-Montreal Global Biodiversity Framework \(GBF\)](#), and
- Other relevant conventions, protocols and guidelines.

Additionally, Materializing Our Values is based on laws and regulations that are applicable to public companies that are listed at the Swedish stock market.

The Structure of Materializing Our Values and its Associated Policies

This document gives an overview of the areas that are covered by Materializing Our Values. Details about requirements and ambitions are found in the supporting Group Policies and Guidelines. The Business Ethics chapter is supported by a Compliance Program relating to Competition and Anti-trust law.

Within the framework and requirements of ISO 14001, and other standardized management systems, it is recommended that each site establishes more detailed policies. The measures in these policies should, however, not fall short of the commitments undertaken by the HEXPOL Group.



* Supported by a Compliance Program relating to Competition and Anti-trust law.
 ** Policies available for all employees but not externally distributed.

Governance, Compliance and Follow-up

Approval Body

Materializing Our Values has been adopted by the Board of Directors of HEXPOL AB in November 2025.

It is reviewed annually to ensure that it remains relevant and reflective of HEXPOL's obligations, expectations, and future development. When necessary, they are updated.

Applies to All

Alongside the corporate governance regulations and the HEXPOL Group's other guidelines, Materializing Our Values serves as a framework for us. It applies to all HEXPOL employees, temporary staff, board members, contractors and consultants – regardless of where they are in the world.

The CEO assumes ultimate responsibility for the implementation and application of the Group Code of Conduct Materializing Our Values and its associated policies.

The responsibility to promote sound business ethics and compliance with our policies is delegated to all managers at all managerial levels within the HEXPOL Group.

This document is a summary. More detailed information is found in each respective Group Policy. HEXPOL employees are not expected to know all the details in the Materializing Our Values and associated policies, but are indeed responsible for understanding requirements that are directly applicable to your position and employment.

Communication & Training

To HEXPOL employees

- Every new employee shall be provided Materializing Our Values and its associated policies, and be given the opportunity to read and discuss its content.
- Materializing Our Values, and associated policies, shall be a part of training and follow-up programs at all levels in HEXPOL Group.

To external stakeholders, incl. customers and suppliers

- Materializing Our Values, and relevant policies, shall be communicated to all external stakeholders
- Materializing Our Values, and relevant policies, shall be shared as part of contracts made between HEXPOL and any supplier or customer

When customers, and other stakeholders, ask HEXPOL to demonstrate compliance with laws, international initiatives and other requirements, the following actions are recommended:

- Send the Materializing Our Values document to the stakeholder and provide directions to the HEXPOL webpage at www.hexpol.com, where more information about the Group Policies is available.

- In addition to that, the HEXPOL Annual Report and its Sustainability Report should be used to demonstrate how we implement and follow up the Group's performance in relation to Materializing Our Values. The reports are found at www.hexpol.com

Storing Location of Documents

Documents that are of interest for our stakeholders are described/posted at HEXPOL's public website. These include:

- The HEXPOL Code of Conduct Materializing Our Values
- Sustainability Policy
- Whistleblower Policy
- Communication Policy,
- Equal Opportunities Policy,
- Insider Policy and Guidelines,
- Supplier Sustainability Guideline, and
- Data Protection Policy.

The above documents, and all other internal Group Policies and Guidelines that are mentioned in this document, are found at the HEXPOL internal database.

For questions concerning Code of Conduct, Group Policies and Guidelines please consult info@hexpol.com.

Compliance Issues

In certain areas of Materializing Our Values and associated Group Policies, we employ a zero-tolerance policy for non-compliance. This applies to such areas as complying with legislation, respecting human rights, and in issues regarding bribes, corruption and competition laws.

In other areas, Materializing Our Values and associated Group Policies are based on work with continuous improvement. Systematic activities enable us to reduce our environmental impact, improve our working environment and implement other improvement measures. Preventive work and the application of the precautionary principle are key concepts for us.

Follow-up and Reporting

We regularly follow up the work on sustainable development and business ethics. Follow-ups take the form of annual questionnaires, but also through dialogues and formal audits. The Group's performance is mainly presented in the Annual Report and its Sustainability Report. Reporting is to meet the requirements set by legal requirements and international standards.

Business Ethics

HEXPOL aims to uphold and promote business methods of the highest possible ethical standards. We work against corruption in all its forms including extortion and bribery. We impose demands on honesty and honorability throughout our operations and expect the same of our business partners. This means that we:

Promote Fair Operating Practices

- We recognize that behaving ethically is fundamental in establishing and sustaining legitimate and productive relationships with our stakeholders.
- We are aware of legal and other requirements and sanctions related to export and import, anti-bribery laws, anti-boycott provisions, trade embargos and the formation of cartels.
- We act in accordance with fair business, marketing and advertising practices.
- We never get involved in any understandings with competitors regarding the allocation of customers or prices, or any other practices or agreements, that restrict competition.
- We respect property and intellectual rights.

Work Against Corruption

- We do not accept any form of corruption. All forms of compensation to agents, suppliers and partners must only be for actual goods or services.
- We identify risks for corruption and implement preventive measures.
- Gifts and other benefits may comprise an element of conventional hospitality but shall not exceed local customs and must be completely in line with local legislation.
- We work actively to prevent the use of HEXPOL for money laundering or terrorist financing.

Avoid Conflicts of Interest

- We make business decisions based on the best interest of HEXPOL. We avoid situations in which company loyalty could come into conflict with personal interests.
- We avoid all situations in which there is a potential conflict of interest in relationships or personal considerations.
- We avoid situations where business decisions could be affected by gifts, hospitality, entertainment, sponsorship, political or charitable contributions, or by a close relationship with any business entity engaging or competing with HEXPOL.

Apply Strict Accounting, Reporting and Tax Principles

- We are transparent and impartial in our financial reporting. We maintain an Insider Policy and an Insider Register that regulates the trading of financial instruments.
- We are committed to ensuring transparency in the Group's financial reporting. HEXPOL has a policy of full, fair and accurate disclosure to ensure that the market receives timely, comprehensive and understandable information on an impartial basis.
- We comply with applicable tax laws and regulations. We pay taxes as required by legislation in each jurisdiction.
- We conduct our business and support tax processes with a high level of ethics and integrity, with the overall aim of producing correct tax outcomes at accurate cost.
- We address tax-related issues promptly and work proactively to mitigate tax risks.

Provide Balanced Information

- Only appointed persons shall make comments that are related to our financial performance, and future prospects, to external parties.
- External statements regarding the HEXPOL Group should only be made by the CEO or CFO. Managers are spokespeople within their respective area of responsibility. Employees may give statements regarding specialist knowledge or on facts that are already known. In situations where these external disclosure restrictions do not provide a clear answer, you should discuss the matter with your senior manager or with the management team.

Uphold Information Security and Confidentiality

- We are careful regarding the Group's critical information and information that may be confidential.
- We maintain confidentiality and discretion regarding information we gain access to in contacts with our business partners.
- We uphold good information management, information safety and IT safety.
- We respect the protection of rights and privacy according to the EU General Data Protection Regulation (GDPR).

Sustainable Business Practices

HEXPOL recognizes that environmental responsibility is a precondition for the survival and prosperity of human beings. The overall aim is that impacts on the environment, that are related to our activities, products and services, should be minimized, and support a precautionary approach to environmental challenges.

Furthermore, HEXPOL respects and supports internationally proclaimed human rights, and to make sure that our activities are not complicit in human rights abuses, for example, in relations with our suppliers. We apply sound labor practices and maintain high standards concerning health and safety at the workplaces. We have routines (Whistleblower Process) for how to bring up issues and complaints regarding human rights and business ethics related aspects.

Science-driven Approach & Precautionary Principle

- We shall base our sustainability-related decisions in line with scientific facts and universally agreed rights and conventions in addition to economic interests of HEXPOL.
- We shall not use the lack of full scientific certainty as an excuse to avoid preventive steps to prevent or reduce negative impact on people and planet.
- We shall continuously identify and assess sustainability-related impacts, risks and opportunities at own operations and our value chain, and act to prevent any negative impact. Relevant measures shall be taken where environmental and/or human rights-related violations are identified, and appropriate remedies shall be provided.

Legal and Other Requirements

- We shall identify relevant sustainability-related legal and other requirements. We will ensure continued compliance with the requirements.
- We have suitable long-term planning in place for new legislation and identify the requirements and requests from employees, customers and other interested parties well in advance.

Respecting the Planetary Boundaries

- We acknowledge and respect the planetary boundaries and take action towards acting within their limits.

Respect and Support Human Rights

- We treat all employees fairly and with dignity and respect.
- We support and encourage diversity and inclusion at our workplaces.
- We aim to achieve a mix of genders, ages and ethnicities in our business and to increase the share of female managers.
- We do not distinguish between our employees on the basis of religion, gender, age, disability, sexual orientation, nationality, political opinion, social background or ethnic origin.

- We do not tolerate harassment, threats or discrimination.
- We do not tolerate child labor; illegal, forced or compulsory labor; modern slavery or human trafficking.

Apply Sound Labor Practices

- We apply sound labor practices at our workplaces.
- We aim to mitigate unconscious bias connected to our workplaces.
- We believe no employee should be hurt while conducting work for HEXPOL and maintain high standards concerning health and safety at our workplaces.
- We foster a culture where accidents and near-accidents are reported in order to avoid that they happen again.

Whistleblowing

- We have routines for whistleblowing in place to bring up issues and complaints regarding human rights, environmental and business ethics related aspects.

Demonstrate Good Citizenship

- We will engage in the local community in which we operate and endeavor to recruit and develop local employees and managers.
- We will prioritize grants and sponsorship agreements that benefit the societies in which we operate.
- We participate in collaborations and projects with schools, universities, research institutes and industrial networks.
- We take a neutral stance on political issues. The name of the company, or any subsidiary, and HEXPOL's financial resources are not to be used in political contexts.

Continual Improvement

- Sustainability impacts shall be managed in a systematic way. We encourage the implementation of relevant management systems at the manufacturing sites.
- We will continually improve our sustainability performance by the implementation and follow-up of objectives, targets and action plans – from strategic to tactical and operational level.
- We shall use the opportunity to improve our sustainability performance whenever there is a change of processes, plants and products.
- Best practices should be applied to reduce negative impacts and increase any positive impacts. >>

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Collaborative Approach

- We shall support each other by sharing knowledge and best practices and identify improvements when visiting each other's sites.
- We engage with other businesses and research initiatives to develop more sustainable products and services connected to the HEXPOL business.
- We engage in open consultations connected to relevant sustainability initiatives.

Transparency & Disclosure

- We shall provide open and objective information about our sustainability work to the general public, authorities, customers, shareholders, media and other interested parties.

- We will report according to applicable legal requirements and international standards and initiatives.
- We will assure our sustainability performance and claims through relevant third-party audits, verification or certifications.
- We should transparently share the environmental footprints of our products to our customers and at a level that does not risk disclosing business sensitive information.



HEXPOL AB (publ), Gibraltargatan 7, SE-211 18 Malmö, Sweden.
Telephone +46 040-25 46 60.

www.hexpol.com