



HEXCEL SUPPLIER CODE OF CONDUCT

Hexcel expects each of its suppliers of goods and services (each a “Supplier” and collectively, “Suppliers”) to operate with the highest ethical and operational standards and to be responsible stewards of human and natural resources for their employees, customers and other stakeholders. Hexcel expects its Suppliers to: (i) comply with the requirements set forth below (“Requirements”); (ii) maintain appropriate management systems to ensure such compliance; and (iii) cascade Requirements through their own supply chain and monitor the adoption by suppliers and subcontractors. Suppliers shall promptly notify Hexcel of any breach of these provisions, including any data or confidentiality breach impacting Hexcel or Hexcel-provided information or data. Continued failure to address or remediate issues related to these standards will be considered by Hexcel to be a material breach of contract by the Supplier and may be grounds for termination by Hexcel in accordance with the applicable contract’s termination provisions.

Each of Hexcel’s Suppliers shall comply, and shall have management processes to ensure compliance, with the following Requirements:

- **Human Rights / Fair Labor Conditions**

- Respect and promote human rights in accordance with the UN Guiding Principles on Business and Human Rights, the International Bill of Human Rights and the International Labor Organization Declaration on Fundamental Principles and Rights at Work.
- Respect the personal dignity, privacy and rights of each individual, particularly through the promotion and support of a diverse and inclusive workforce.
- Not use forced labor, including but not limited to involuntary prison labor, victims of slavery or human trafficking.
- The use of child labor is strictly prohibited. Employment of persons younger than the higher of sixteen years of age or the minimum legal age for employment in that country is not permitted, provided that this shall not exclude a Supplier program for participation of persons in legitimate apprenticeship positions which comply with all applicable legal requirements.
- Not discriminate against employees or in the hiring of employees based on any characteristic protected by applicable law, including but not limited to gender, age, ethnicity, nationality, religion, disability, union membership, political affiliation, or sexual orientation.
- Not tolerate harassment, discrimination, violence, retaliation or other disrespectful behavior.
- Employee compensation must be not less than the legally required minimum rates per hour (including overtime) as well as all legally mandated employee benefits.
- Ensure that working hours, including overtime, do not exceed applicable legal requirements.
- Comply with all applicable laws and regulations and respect the right to collective bargaining and freedom of association in the workplace.
- Permit employees to raise concerns with management or governmental authorities without fear of reprisal.
- Respect the rights of local communities, including observing the ban on unlawful eviction and respecting access to land, forest and water.

- **Health, Safety and Environmental Management and Sustainability**

- Provide a safe and healthy workplace for its employees.
- Ensure employee knowledge of health, safety and environmental requirements for their job responsibilities through effective training, education and risk reduction programs.



- Comply with all applicable health, safety and environmental laws and regulations and pursue best practices to reduce the frequency of injuries, operational upsets and compliance deviations.
- Conduct business in an environmentally responsible and sustainable manner that minimizes the environmental impacts of its operations. Suppliers are expected to reduce greenhouse gases, air emissions, waste generation, natural resource usage and water consumption, avoid unnecessary pollution of the land, soil, air and water, and increase reuse and recycling.
- Manage highly hazardous chemicals and related obsolescence matters, and ensure business continuity measures are in place to reduce supply chain impacts in the event of a potential catastrophic event.
- **Business Ethics**
 - Conduct its business in an ethical manner and in compliance with all laws and regulations that apply to the Supplier's business, including but not limited to:
 - Anti-Corruption and Anti-Bribery Laws. Specifically, Supplier will not offer or accept any bribes, kickbacks or favors, or use any improper influence when dealing with government officials or in any business arrangements, including business arrangements with Hexcel.
 - Antitrust Laws. Supplier will comply with antitrust and other applicable competition laws and regulations.
 - Intellectual Property. Supplier will respect the intellectual property rights of others (including Hexcel) and comply with applicable laws and regulations governing intellectual property.
 - Trade/Export Laws. Supplier will comply with international trade and export control regulations.
 - Supplier will disclose to Hexcel any actual or potential conflicts of interest.
- **Gifts and Entertainment**
 - Maintain appropriate records reflecting gifts and entertainment. Gifts and entertainment shall not be excessive and shall not be used to gain advantage with or preferential treatment from Hexcel.
- **Inspections and Corrective Actions**
 - On reasonable notice to Supplier, allow Hexcel at its own expense to conduct inspections of Supplier's facilities (with or without third party assistance) to ensure compliance with this Supplier Code of Conduct.
 - Supplier shall be required at Supplier's expense to correct any activities or conditions identified by Hexcel as not conforming to this Supplier Code of Conduct.
- **Confidentiality, Intellectual Property and Data Privacy Rules**
 - Protect and respect the intellectual property and confidential information of Hexcel and third parties, and ensure that the intellectual property and confidential information of Hexcel and any third parties is used solely as explicitly permitted by applicable agreement(s).
 - Collect, process, disclose or store personal data ONLY for a legitimate business purpose, and ensure that proper agreements are in place before collecting or processing such data, or before transferring such data to third parties.
- **Accuracy of Records and Documentation**



- Create accurate manufacturing, quality and financial records, and not alter any record to conceal or misrepresent the underlying transaction represented by it or the products or services provided under such transaction.
- Ensure that all records made or received by Supplier as evidence of a business transaction will fully and accurately represent the transaction or event being documented.
- **Information and Cybersecurity**
 - Protect the security of Hexcel's and Hexcel's customer, supplier and other third-party data, business information, organizational information, processing systems, and facility access by Supplier establishing and implementing a comprehensive set of information security operating standards and procedures for itself and its supply chain.

ALTERNATIVE CODE OF CONDUCT

Notwithstanding the foregoing Requirements, if a Supplier has its own code of conduct that covers most or all of the principles set forth above, the Supplier may present its code of conduct to Hexcel as an alternative to complying with this Supplier Code of Conduct. Hexcel, in its sole discretion, may accept or reject the alternative code of conduct and will advise the Supplier in writing of its decision.

REPORTING ISSUES OR RAISING CONCERNS AND QUESTIONS

If a Supplier or Supplier's employee has a question regarding any aspect of this Supplier Code of Conduct or wishes to report a problem or concern related to a possible violation of this Supplier Code of Conduct, they should speak to their Hexcel sourcing or purchasing contact. However, if this is impractical or inappropriate under the circumstances, reports or questions can be raised directly or anonymously to the Hexcel Compliance Department through the Hexcel SafeTalk Help Line which can be accessed:

- By Phone at: +1.844.929.1438 (toll free in the U.S.) (interpreters for non-English speakers are available)
- Via the Internet at: <https://hexcel.ethicspoint.com>
- Via mobile at: <https://hexcel.navexone.com>

Hexcel will respond to all reports or questions.