

Speaking Up at Hexcel

Hexcel employees at every level, in every department, and at every location have a responsibility to speak up when they believe they have knowledge that the Company or one of its employees is acting improperly. Speaking up protects Hexcel, its employees, and its stakeholders. If you observe impropriety first hand, speak up. If you suspect non-compliance with laws or Company policies, speak up. If you have a question about how to do the right thing, speak up.

Why speak up? Examples of Issues to Report

Hexcel is committed to speaking up because it is an important way to foster a culture of trust and to detect instances of non-compliance that may harm the continued success of our Company and our reputation. Employees should speak up about all violations or suspected instances of misconduct including, but not limited to:

- Theft or Fraud
- Bribery, corruption, and inappropriate giving or receiving of gifts or entertainment
- Inappropriate or inaccurate financial and accounting records or controls
- Product tampering or alteration, and alteration of quality records
- Discrimination
- Harassment of any sort
- Environmental, health, and safety violations
- Inappropriate use of Company assets
- Misuse of intellectual property rights; or
- Retaliation

For example, if you work in a plant and learn of foreign material (FOD) entering a product, you need to report that fact immediately. If you work in an office or warehouse and learn of theft of supplies or products, report it immediately. If you are in procurement and learn of a supplier offering lavish gifts to employees, whether or not they were accepted, you should speak up. If you work in sales or finance and you become aware of accounting entries that do not properly record sales revenues or promotional expenses, you need to speak up.

Your voice matters. Management needs to know about your concerns so the Company can address issues quickly and properly. By raising concerns, you help to protect yourself, your co-workers, and the Company. Timeliness in reporting is essential. We encourage you to speak up as soon as possible, ideally before situations get out of hand or damage is done. It is always better to discuss a potential issue upfront than to report afterwards. If you know about or suspect misconduct, speak up with the facts you have. We do not expect you to have all the answers and you are certainly not expected to prove that your concern is well-founded. Let Hexcel look into the matter to determine if there is a reason for concern.

Employees who engage vendors, consultants, temporary help, or other service providers must monitor their work to be sure that they act in a manner consistent with the principles in the Code of Business Conduct and Company policies, and report when they do not.

No matter where you work, and no matter what level of job you have, if you learn of wrongdoing, Hexcel wants to hear from you.

Self-Reporting

If you believe that you have been personally involved in an instance of non-compliance, you are still expected to speak up; it is better to self-report than to be the subject of another person's allegation. Hexcel will consider the situation fully when deciding if disciplinary action is necessary.

Non-Retaliation Statement

Employees should feel comfortable reporting issues of non-compliance and suspected misconduct. Retaliation of any type will not be tolerated against an employee who brings forward a concern in good faith. If you suspect retaliation against you, personally, or any Hexcel employee for speaking up, report your concern. Anyone who is found to attempt retaliation against an employee for speaking up will face discipline, which may include termination.

Confidentiality

Hexcel respects confidentiality and will protect the identity of any employee who brings a concern forward in good faith. Relevant information will be shared on a "need to know" basis only with individuals responsible for investigating and resolving the concern.

Reporting Channels

Hexcel offers several channels for speaking up. Use the channel with which you are most comfortable, starting with your manager. Other speaking up channels include:

- Another manager or supervisor
- Your HR Department representative
- The Law Department
- The Hexcel SafeTalk Help Line at: www.hexcel.ethicspoint.com
- The Hexcel SafeTalk Help Line at the following local toll-free numbers:
 - o Austria: 0800 068742
 - o Belgium: 0800 70 183
 - o China: 400 120 4706
 - o France: 0 805 08 01 01
 - o Germany: 0800 1809036
 - o Morocco: phone access is not available. Please report through the Hexcel SafeTalk Help Line website at www.hexcel.ethicspoint.com
 - o Spain: 900 999 393
 - o U.K.: 0800 098 8478
 - o U.S.: 1 844 929 1438
 - o Other Sales Locations: please consult the Hexcel SafeTalk website at www.hexcel.ethicspoint.com for phone access information
- The Hexcel SafeTalk Help Line via mobile phone access at: www.hexcel.navexone.com or the QR code available on SafeTalk posters throughout your location.

Face-to-face discussions are often best, but there may be times when you may not feel comfortable talking to someone in person or you may prefer to remain anonymous. If you

are uncomfortable reporting directly to your manager, or to HR or the Law Department, you can report anonymously via the Hexcel SafeTalk Help Line – without fear of retaliation. These tools allow you to report your concerns anywhere, anytime. Note that in certain countries, national data privacy laws do not permit certain types of issues or concerns to be raised via the Help Line. In such cases, please contact local management or your local HR representative.

When another Employee approaches you with a Concern

If an employee comes to you with a concern, you are expected to immediately inform the most senior person at your location or your functional manager. The senior employee or other Hexcel employee who receives the concern or report will then inform the Law Department so that an investigation may be initiated. If the concern or report involves the most senior person or functional leader, don't worry. You may always report concerns directly to the Law Department or HR Department, or through the Hexcel SafeTalk Help Line via the access methods described above.

Expectations of Managers and Supervisors

Every manager or supervisor who receives a report is expected to treat the concern or allegation with discretion, and to treat the employee who brought the concern forward with respect. The manager or supervisor is expected to escalate this concern per the Hexcel Escalation Criteria for Employees (attached).

Manager Failing to Take Action

If you bring a concern to your manager and are told to “keep quiet,” you should immediately contact the Law Department or the Hexcel SafeTalk Help Line to report the concern as well as the manager's pushback. We don't want you to feel pressured into not disclosing your concerns.

Uncertainty about Raising a Concern

We realize it can be hard to raise concerns. Speaking up takes courage, but it is the right thing to do. As a Hexcel employee, we depend on you to do the right thing, and you do the right thing when you raise a concern.

Any time an employee raises a good faith concern about a potential issue, management will investigate it and take appropriate actions.

Investigations Process

When an employee raises a concern, Hexcel investigates the facts to determine objectively what has happened; no one is judged to be “guilty” or “at fault” before this investigation is complete. The Hexcel Law Department will work with the HR Department and other managers, if necessary, to determine how best to investigate and resolve the matter. The privacy of the reporting employee will be respected; confidential information will be shared only on a “need to know” basis.

What should you expect after reporting a concern?

You may or may not be involved in the investigation after bringing your concern forward. However, Hexcel takes all reports seriously and we investigate appropriately.

Investigation Outcomes

Each reported case is unique. We may determine that we do not need to take action or that we need to take corrective actions. Depending on the circumstances we may need to report to a governmental agency. If the facts warrant, management will take corrective action to improve business systems or take disciplinary action against employees who have broken the law or violated Company policy or our Code of Business Conduct. To the extent appropriate, we will report back to the person who first raised the concern.

Board of Directors Reporting

The Law Department reports periodically to the Board of Directors on cases of non-compliance brought forward by Hexcel employees.

Right to Contact Regulatory Authorities or Government Agencies/Entities

Employees may always exercise their rights to directly contact any regulatory authority, government agency or entity, to report possible violations of law or make other disclosures under applicable whistleblower laws. Employees do not need prior authorization from Hexcel or their management to make any such reports or disclosures and will not be retaliated against for making such reports or disclosures.

Questions?

If you have questions about the Policy, please:

- Speak to your manager
- Visit the Hexcel Compliance website
- Contact the Law Department
- Access the Hexcel Safe Talk Help Line via phone, internet or mobile device

Hexcel's Escalation Criteria for Employees

As an employee, and particularly if you are a manager, you may have another employee come to you with concerns, allegations, and/or information about possible violations. Some information you receive should be handled locally by you or by Human Resources at your location and other issues will need to be escalated immediately to the Law Department. This chart is a guide to help you know how to escalate information you receive. You should contact your manager, the Law Department, or ComplianceLine if you are unsure or have any questions about information you receive.

Priority 1 Allegation: Violation with Serious Implications for the Company

Characteristic of Allegation	Escalate?
<p>Includes one of the following characteristics:</p> <ul style="list-style-type: none"> • Violates a law or regulation • Involves senior officials (HLT or their direct reports) • Relates to fraud, internal controls or accounting • Poses serious operational, reputational, or financial risk to the Company • Represents an egregious, willful attempt to circumvent normal procedures or controls • Poses significant environmental, health, or safety risks 	<u>Yes</u>
	To:
	The Law Department or Corporate Finance* or Your Manager
<p>Examples:</p> <ul style="list-style-type: none"> ▪ An employee has manipulated or withheld information from financial or quality documents ▪ An employee hides information about the Company or its products that should be communicated to regulators or customers ▪ An employee has directly or indirectly bribed a government official or customer or received bribes or kickbacks ▪ An employee is sexually harassing or discriminating against another employee based on their race, gender, age, nationality, religion or sexual orientation 	

- * Particularly if the matter involves an allegation of fraud, failure to adhere to internal controls, or poses potential financial risk to the Company, reporting to Corporate Finance (the CFO or SVP/Corporate Controller) may be appropriate.

Priority 2 Allegation: Violation with Limited Material Risk to the Company

Characteristic of Allegation	Escalate?
<p>Includes one of the following characteristics:</p> <ul style="list-style-type: none"> • Potentially violates the Company Code or Company policy • Raises an actual or potential conflict of interest • The issue could escalate further or become disruptive in the workplace, including disputes between employees or between an employee and supervisor • No significant impact on Company interests currently expected 	<p><u>Yes</u></p>
	<p>To:</p>
	<p>Local Human Resources or The Law Department or Hexcel SafeTalk Help Line or Your Manager</p>
<p>Examples:</p> <ul style="list-style-type: none"> ▪ Employee says, “Tom makes inappropriate statements about Hexcel on social media.” ▪ Employee reports that another employee uses foul language or has shown disrespect to another employee ▪ Employee reports that another employee does not consistently wear personal protective equipment as required 	

Priority 3 Allegation: No Violation, Minor Violation, or General Questions

Characteristic of Allegation	Escalate?
<p>Includes one of the following characteristics:</p> <ul style="list-style-type: none"> • General employee relations issues, including employee benefits • Gift and entertainment questions • Questions about the Code of Business Conduct • Questions about how to use the Hexcel SafeTalk Help Line • Questions about how investigations are handled 	<p><u>No</u>, if there is clearly no violation and no further action is needed</p>
	<p><u>Yes</u>, if further clarification may be helpful to the reporting employee or to you</p>
	<p>To: Local HR or Hexcel SafeTalk Help Line</p>
<p>Examples:</p> <ul style="list-style-type: none"> ▪ Employee asks you if he/she can accept a small gift basket during the holidays from a supplier and you approve as a nominal gift – No escalation required ▪ Employee says, “I made a report to the Hexcel Safe Talk Help Line but haven’t heard anything about it since I called.” – Should be escalated to check the process. 	