



## **HEXCEL SUPPLIER CODE OF CONDUCT**

Hexcel requires its suppliers of goods and services (each a “Supplier” and collectively “Suppliers”) to: (i) comply with the requirements set forth below (“Requirements”); and (ii) maintain appropriate management systems to ensure such compliance. Failure to adhere to these standards will be considered by Hexcel to be a material breach of contract by the Supplier and will 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 the personal dignity, privacy and rights of each individual.
- Not use forced labor, including but not limited to involuntary prison labor or victims of slavery or human trafficking.
- Not use child labor.
- Not discriminate against employees or in the hiring of employees based on any characteristic protected by 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.
- Ensure that working hours, including overtime, do not exceed applicable legal requirements.
- Permit employees to raise concerns with management without fear of reprisal.

- **Health, Safety and Environmental Management**

- Provide a safe and healthy workplace for its employees.
- Ensure employee awareness of health, safety and environmental requirements through proper training programs.
- Conduct its business in an environmentally responsible way, including compliance with all applicable environmental laws and regulations.

- **Business Ethics**

- Conduct its business in an ethical manner and in compliance with all laws and regulations that apply to 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 its 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 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 Code of Conduct.
- Correct, at Supplier's expense, any activities or conditions identified by Hexcel as not conforming to this 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 records, and not alter any record to conceal or misrepresent the underlying transaction represented by it.
- 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.

## **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 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.