



Integrity Is at Our Core

CODE OF BUSINESS CONDUCT



Table of Contents

Our Hexcel Values 3

Integrity and Fairness Are at the Core of Everything We Do 4

Integrity Is at Our Core 5

Doing Business the Right Way 6

How We Use the Code.....	7
Ethical Decision Making.....	8
Speaking Up and Seeking Help.....	9
External Reporting and Investigations.....	10
Discipline for Violations.....	12
Waivers and Amendments to the Code.....	12

The Hexcel Workplace..... 13

Maintaining a Safe and Healthy Workplace.....	14
Preventing Workplace Violence and Substance Abuse.....	15
Embracing Inclusion and Preventing Harassment and Discrimination.....	16
Protecting Human Rights.....	18
Safeguarding Data Privacy.....	19

Our Marketplace..... 20

Contracting with the Government.....	21
Competing Fairly and Gathering Competitive Information.....	22
Delivering Quality Products and Services.....	24
Exchanging Gifts and Entertainment Responsibly.....	25
Engaging in the Political Process with Integrity.....	26

Our Global Responsibilities 27

Protecting the Environment.....	28
Conducting International Trade Legally.....	29
Working with Third Parties and Preventing Bribery and Corruption.....	30

Our Shareholder Commitments..... 32

Guarding Hexcel Assets.....	33
Using Technical Resources Responsibly.....	35
Using Artificial Intelligence Safely.....	37
Using Social Media Wisely.....	38
Preventing Fraud and Ensuring Accurate Financial Disclosures.....	39
Protecting Confidential Information.....	41
Avoiding Insider Trading.....	43
Managing Conflicts of Interest.....	45
Protecting Intellectual Property.....	46

Our Hexcel Values

Our Values and Code of Business Conduct are essential to how we succeed as a company. They promote a safe and respectful environment, reflect the best of our culture and shape how we work. Together, they guide us through challenges and inspire our work—lightweighting to propel the future.

Putting safety first, always

We prioritize safety for everyone, in every decision.

Leading with integrity, delivering quality

We go above and beyond for our customers, communities, and each other.

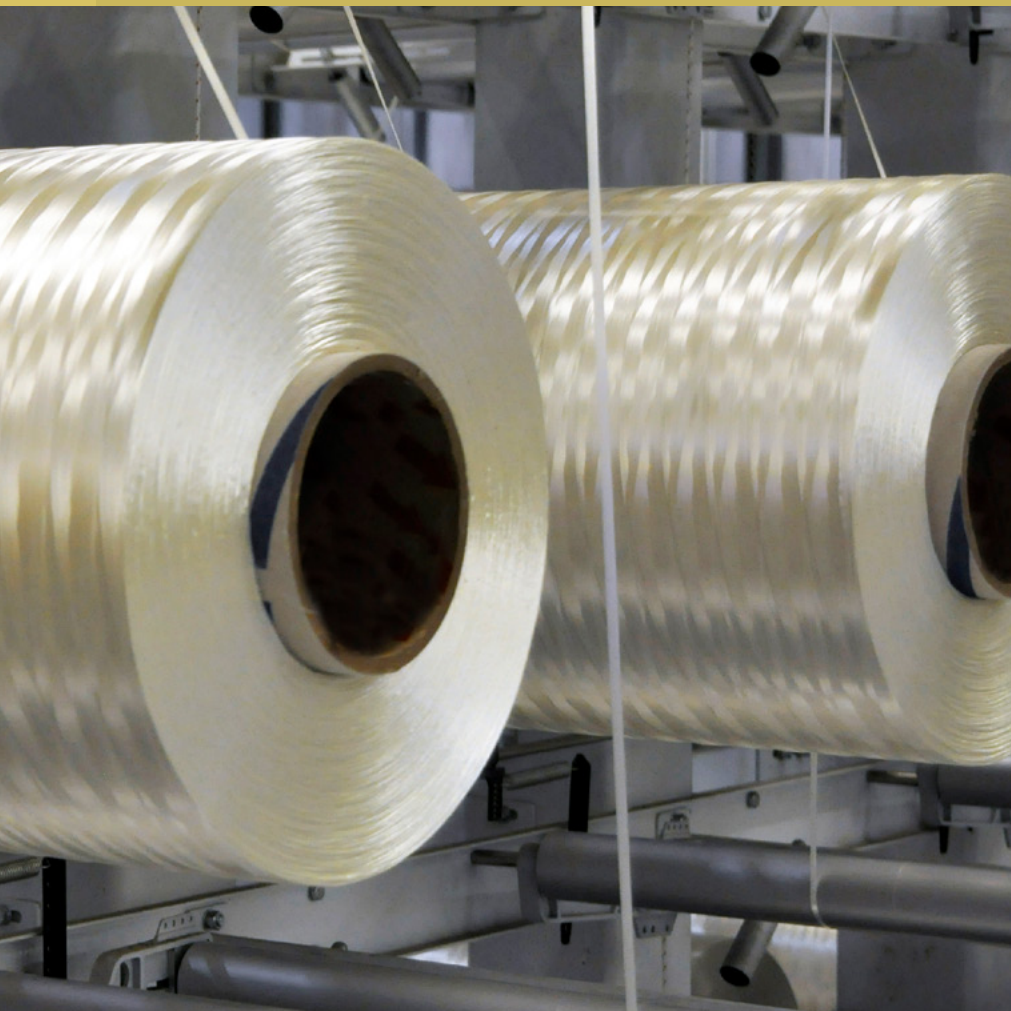
One Hexcel, embracing the strength within

We collaborate as one team to serve our customers better.

Improving today, better tomorrow

We welcome creativity and new ideas.

Integrity and Fairness Are at the Core of Everything We Do



We trust each other to uphold this commitment and to protect Hexcel's reputation.

Since its founding in 1948, Hexcel has been synonymous with innovation. The company that came to be known as Hexcel was born in the San Francisco Bay area of Northern California, nurtured by a band of fraternity brothers from the University of California at Berkeley. Hexcel's early product line was honeycomb core and the newly-formed company was ready when the defense aerospace industry in the United States needed strong, lightweight materials following World War II. To this day, we remain a leader in delivering innovative advanced composite solutions to our customers. Indeed, a pioneering spirit, sheer persistence, and integrity have always epitomized the Hexcel brand.

From those early roots, Hexcel worked to protect its reputation as a company that does the right thing. At Hexcel, we involve the right people in our decision-making. When we face tough decisions, we consider the potential consequences of our actions, aiming for fairness across our employee population and with the goal of minimizing negative impacts to our business partners and communities. We know that cutting corners or ignoring our ethical principles can

lead to the destruction of value and a loss of our credibility among stakeholder groups. We are One Hexcel: collaborating, building consensus, valuing our employees at all levels in the organization, and making sure that these employees understand that **HOW** we do things is as important as **WHAT** we do.

This Code and the processes we have established to ensure compliance with our ethical and legal responsibilities, investigate employee concerns, and develop corrective actions, are all based on the idea that we need people to Speak Up when they see suspected wrongdoing. Therefore, we must foster trust in our handling of these reports. Our assessments and investigations must be conducted in a fair and consistent manner, no matter whether the individual reporting a concern or the potential wrongdoer is at a particular level in the organization. Impartial, honest and uniform treatment is essential.

We all have a responsibility to promote the One Hexcel values and to foster an "integrity first" mindset at Hexcel. Acting ethically is at our core!



Integrity Is at Our Core

Every day, we face decisions—some straightforward, others more complex. When the path is not clear, we turn to what anchors us: our Values. At Hexcel, we share a set of Values that guide our actions and unite us.

We trust one another to do the right thing, especially when it comes to **putting safety first, always**—for everyone, in every decision. **Leading with integrity, delivering quality** is how we build trust and provide the best value to our customers and show our commitment to the communities where we live and work. **One Hexcel, embracing the strength within** reflects our dedication to work as one team to serve our customers better. And, by welcoming creative and new ideas, we encourage innovation that leads to better products and solutions—**improving today, better tomorrow**.

Our Hexcel Code of Business Conduct shows us how to put these Values into practice every day. It is our guide for how we live, act, work and lead with safety, consistency and integrity. I encourage you to read it, reflect on it, and refer to it often. Because when we align our decisions with our Code and Values, our lightweighting solutions propel the future.



Tom Gentile
Chairman, Chief Executive Officer
and President

Doing Business the Right Way

How We Use the Code

Ethical Decision Making

Speaking Up and Seeking Help

External Reporting
and Investigations

Discipline for Violations

Waivers and Amendments
to the Code



How We Use the Code

Our Code of Business Conduct guides all of us at Hexcel to act ethically. Our Code and our good judgment help us live our Values regardless of our job or location.

Our Code helps us:

- Understand expectations and where to seek assistance for ethical and legal questions.
- Report suspected unethical or unlawful conduct.
- Ensure prompt corrective action is taken in response to inappropriate conduct or wrongdoing.
- Avoid even the appearance of impropriety.

Our Responsibilities

We are all responsible for knowing and following our Code. It applies to everyone doing Hexcel business, including all directors, officers, employees, consultants and business partners.

Special Responsibilities of Leaders

Those with leadership or supervisory roles have heightened responsibilities. Leaders encourage their teams to follow our Values, the Code and the law by:

- Creating a safe and healthy work environment for our team members that promotes integrity.
- Communicating the importance of ethical practices and the long-term value of doing the right thing.
- Encouraging others to speak up without fear of retaliation.
- Being responsive and supportive when others reach out for help.

Hexcel managers and supervisors are also required to report immediately any and all violations of the Code, Hexcel policy or applicable law.



Ethical Decision Making

Our Code cannot anticipate every ethical dilemma that you may encounter at work, and in some cases, you will have to use your best judgment to decide the correct approach. In these situations, the ETHICS model can help you make decisions that are consistent with our Values and the Code. If you have questions at any time while utilizing the ETHICS model, contact your manager, HR, the Law Department or the SafeTalk Helpline for support.

Ethical Decision-Making Model

Our **ETHICS** model is there to help employees with decision making when faced with an ethical dilemma or problem



Speaking Up and Seeking Help

As part of One Hexcel, it is our right and responsibility to speak up and voice our concerns whenever we see or experience unethical or illegal conduct. If you know of or suspect misconduct, you must report it immediately through one of our available reporting channels:

- Your supervisor, manager or site leader
- Human Resources
- The Law Department
- The SafeTalk Helpline
- For fraud, internal accounting control, and accounting standards matters, the Audit Committee of the Board of Directors at auditcommittee@hexcel.com

Although reporting a concern is not always easy, it can prevent issues from escalating or reoccurring.

We must also seek guidance through one of these available reporting channels if we have questions about the Code, our Hexcel Values or the law.

NOTE: Your site may have other means of reporting specific types of ethical or compliance issues. Check with your Human Resources manager or the Law Department for more information.



External Reporting and Investigations

Nothing in this Code restricts you from reporting possible violations of law or regulation or directly assisting an investigation or inquiry conducted by a regulatory authority or government agency. You are also not prohibited from making other disclosures that are protected under the whistle-blower provisions of any applicable law or regulation.



SAFETALK

An independent company called NAVEX operates our SafeTalk Helpline. It is a free service, available 24 hours a day, 7 days a week.

Through the SafeTalk Helpline, employees and other external stakeholders, such as contractors, suppliers or intermediaries, can submit questions and concerns confidentially or anonymously. If you choose to remain anonymous, the operator (for phone reporting) or the NAVEX system (for reporting online or via your mobile) will not record your identity, phone number or IP address.

Translators are available if you request one for phone reporting, and the NAVEX system is available online in most languages spoken by our employees.

Contact the SafeTalk Helpline in any of these ways:

Phone: SafeTalk Phone Numbers

Online: <http://hexcel.ethicspoint.com>

Mobile: <http://hexcel.navexone.com>
or use the QR code below



Note that local privacy laws in some countries may prohibit non-employees from using the SafeTalk Helpline or limit reports to only certain subject matters. For those other types of issues that cannot be reported via the SafeTalk Helpline, you can use one of the other available reporting channels.

What Happens When I Make a Report?

Allegations of violations of our Code are taken very seriously. Hexcel will promptly respond to all questions and concerns raised through one of our available reporting channels. When a matter is reported, it will be reviewed and, if sufficient information is provided, investigated. All investigations are conducted in accordance with our Business Ethics and Compliance Program policy. The content of the report will be treated as confidential to the extent reasonably possible.

Following your initial report, you may be asked to provide additional details to allow for a thorough and fair investigation. If you choose to report anonymously, the SafeTalk system allows you to communicate with a member of the Law Department without disclosing your identity.

Hexcel is committed to treating all parties involved in an investigation with respect. Subject to applicable law, you must cooperate fully with any inquiry or investigation, including accurately responding to all questions and information requests.

Hexcel will not tolerate retaliation against anyone who makes a report in good faith, seeks help or takes part in an investigation. Retaliation is unacceptable, violates this Code and may lead to disciplinary action, up to and including termination.

Retaliation can take many forms, including threats, discrimination, harassment, demotion, reassignment, firing or violence. If you believe you have experienced retaliation, you should immediately report it to your supervisor, Human Resources, the Law Department or the SafeTalk Helpline. We will investigate all allegations of retaliation.

+ Resources

Prohibition of Abusive Conduct,
Discrimination, Harassment, and
Retaliation (CP 1.12)

Hexcel Speaking Up Guidelines

Business Ethics and Compliance
Program policy (CP 1.08)

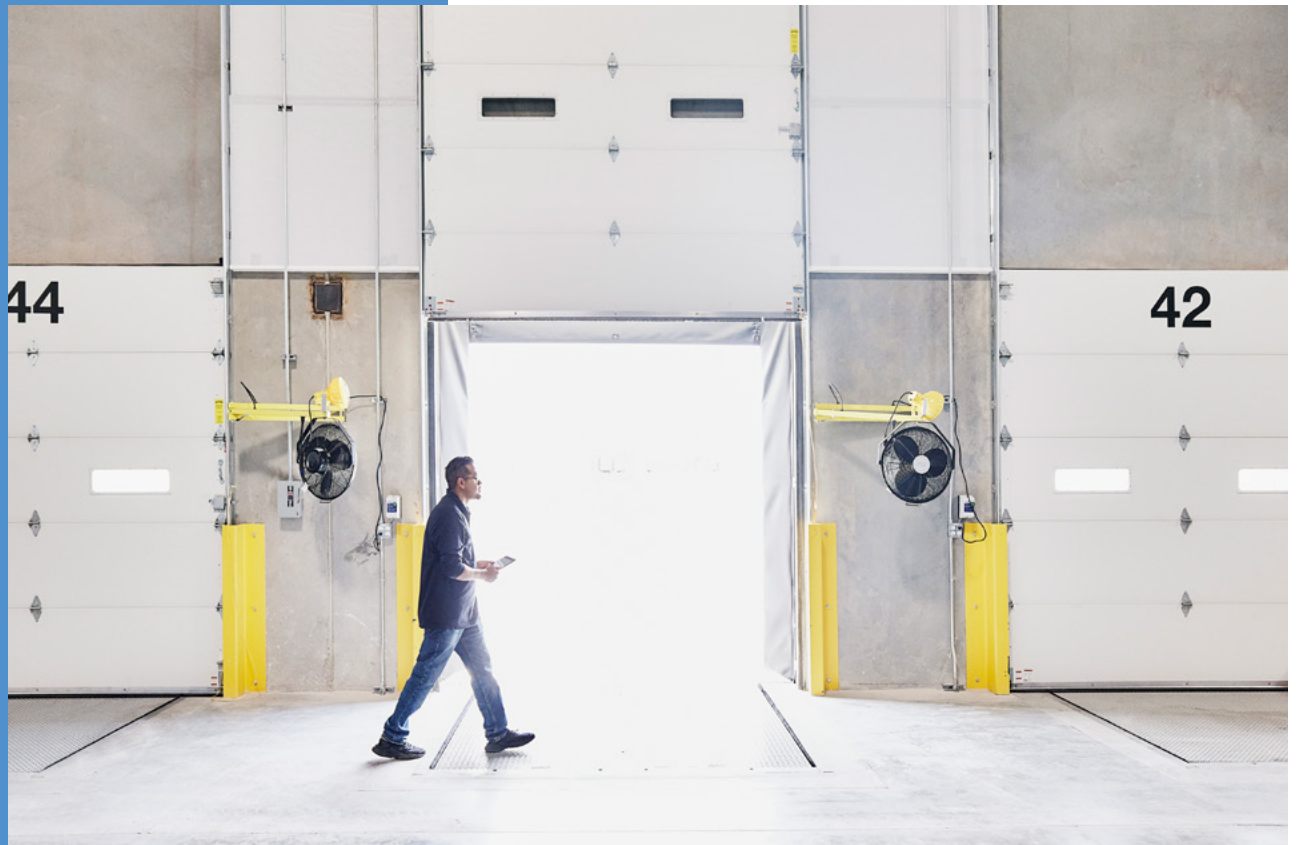


Discipline for Violations

Violation of this Code is a serious matter that may lead to discipline, up to and including termination of employment. Disciplinary measures will apply to anyone who commits or approves misconduct, or when a supervisor or manager is aware of misconduct and does not promptly report or correct it. In the case of a violation of law, civil and/or criminal penalties may also be imposed by a governmental agency or court.

Waivers and Amendments to the Code

The Hexcel Board of Directors is responsible for approving and issuing this Code. The Board must approve any substantial or material amendments to the Code. Waivers of the Code are rare and require the prior written approval of the chief executive officer and the chief legal officer or, in the case of any Hexcel director or executive officer, the Hexcel Board of Directors or a committee of the Board. Any such waiver will be disclosed as required by applicable law.





The Hexcel Workplace

Maintaining a Safe and Healthy Workplace

Preventing Workplace Violence and Substance Abuse

Embracing Inclusion and Preventing Harassment and Discrimination

Protecting Human Rights

Safeguarding Data Privacy

Maintaining a Safe and Healthy Workplace

Our Commitment

Hexcel prioritizes the well-being of its workforce, and we understand that our employees must be kept safe while at work for Hexcel to be truly successful. It takes each of us, working together, to achieve Hexcel's goal of zero injuries and safety incidents. We are all responsible for the health and safety of our colleagues, our work sites and our communities.



✓ DO

- Stop the job and speak up if you are asked to perform a task you believe is unsafe or for which you lack the proper knowledge, tools or protective equipment.
- Immediately report any safety concerns or potential risks, such as someone performing a task in an unsafe manner, removing or deactivating guarding, interlocks or environmental control equipment, or failing to use required personal protective equipment.
- Make sure all workers on your team are properly trained and follow all rules and procedures.
- Know, understand and comply with the Hexcel EHS Golden Rules (HMS 3.1.21) at all times.

✗ DON'T

- Compromise health and safety for any reason.
- Remain silent when others are not working in compliance with health and safety rules and procedures.
- Fail to immediately report an incident, injury or illness to the appropriate supervisor, line manager, EHS site manager or site leader.

⊕ Resources

Hexcel Speaking Up Guidelines

Hexcel EHS Golden Rules (HMS 3.1.21)

Site EHS Standards and Procedures

? Integrity in Action

Q: While working on a project, I noticed a potential safety hazard. Reporting the hazard could cause both a delay in work and added costs for Hexcel. Is it okay if I wait to report this issue until after we complete the project?

A: No, you should notify your supervisor, site leader or EHS site manager immediately. Promptly report any potential hazard that could endanger you or a co-worker, or damage Hexcel equipment. You may also make a report through the SafeTalk Helpline.

Preventing Workplace Violence and Substance Abuse

Our Commitment

The Hexcel commitment to safety includes ensuring our workplaces are free from violence and the use of substances that could impair our ability to perform our jobs. Acts of violence, threats and physical intimidation have no place at Hexcel. The same is true for working while impaired. Employees should report to work fit for duty and free of any adverse effects of any substance that would impair their ability to work safely in the workplace.



✓ DO

- Talk through disagreements calmly before they escalate.
- Report any violent incidents, intimidation or threats of violence right away.
- Report impaired or suspicious behavior to your line manager, site leader, EHS or your Human Resources manager.
- Seek assistance if you have a drug or alcohol problem. Contact your Human Resources manager to find out whether there are any programs available to you.

✗ DON'T

- Bring firearms, explosives or any other weapon onto Hexcel sites, or while conducting Company business, even if you have a permit or license to carry a weapon.
- Consume alcohol, illegal drugs or other controlled substances in the workplace, or work under the influence of any substance that would impair your judgment or pose a safety risk.
- Sell, use, possess, manufacture or distribute any controlled substance on Hexcel property or while conducting Hexcel business.

? Integrity in Action

Q: I will attend a trade show on behalf of Hexcel, and alcohol will be served at the opening reception. Is it acceptable for me to drink alcohol at this event?

A: Yes, provided you are legally entitled to drink alcohol under applicable law and do not become impaired. If you need to drive or use equipment, you should not consume alcohol. Remember, your behavior in this context reflects upon Hexcel and could place both you personally and Hexcel at legal risk.

+ Resources

Emergency Preparedness and Response Prevention of Workplace Violence Guidance Tool (HMS 4.0.16)

Prohibition of Abusive Conduct, Discrimination, Harassment, and Retaliation (CP 1.12)

Human Rights Policy (CP 1.11)

Embracing Inclusion and Preventing Harassment and Discrimination

Our Commitment

We create work environments free from harassment or discrimination and treat everyone with respect, dignity and honesty. A hostile work environment does not support superior work, is contrary to Hexcel's Values, and in most cases violates the law.

As One Hexcel, we thrive on the different skills and viewpoints each of us brings to the workplace. We respect the various backgrounds, capabilities and opinions of our people. Inclusivity expands our skill sets and broadens our perspectives. Through it, we build a workplace that reflects the communities where we do business.



✓ DO

- Treat everyone we encounter in our workplace fairly and with respect.
- Support inclusion at every level of the Company and every stage of hiring and development.
- Foster a work environment that encourages learning and collaboration.
- Take responsibility for making sure everyone counts and every voice is heard.

✗ DON'T

- Tolerate any form of harassment, bias, unfair treatment or offensive or disrespectful language or conduct.
- Allow the use of discriminatory language or any other remarks, jokes, social media or internal postings, or conduct that may create or foster an offensive or hostile work environment.
- Discourage employees from openly sharing in the workplace what personal attributes make them different.
- Exclude employees with different backgrounds and work experiences from sharing new perspectives or solutions.

? Integrity in Action

Q: A co-worker often jokes about my appearance and makes up embarrassing nicknames for me. Their comments have nothing to do with my sex, and the person does this to both men and women in the department. Is this against Company policy?

A: Yes. Behavior does not have to be sexual in nature to be intimidating, offensive or bullying. Hexcel does not tolerate this type of behavior in the workplace, even if the behavior does not constitute illegal sexual harassment or racial or other discrimination. You should report your concern through one of our available reporting channels.

Q: My manager frequently loses his temper and raises his voice when our team makes a mistake or misses a deadline. Is that harassment?

A: All Hexcel employees are entitled to a work environment that is free from intimidating, offensive or hostile conduct. While not all critical remarks constitute harassment, we are committed to maintaining a safe and respectful workplace. If you believe the behavior is creating an uncomfortable environment, share your concerns through one of our available reporting channels.

+ Resources

Prohibition of Abusive Conduct, Discrimination, Harassment, and Retaliation (CP 1.12)

Career Management, Learning & Development Policy (CP 1.13)

One Hexcel SharePoint Site

Q: I am currently on a team where the same voices dominate. How can I encourage others to share ideas?

A: You can actively seek alternative opinions by asking for feedback or speaking up when a viewpoint is overlooked. When a new voice is heard, listen attentively and ensure that person feels acknowledged. Additionally, try to create a safe and inclusive work environment by continuously emphasizing the value of different thoughts and ideas for fostering growth and innovation.



Protecting Human Rights

Our Commitment

We support human rights and operate globally under policies and programs that:

- Make available fair and competitive wages, benefits and terms of employment.
- Recognize the right to freedom of association.
- Provide humane and safe working conditions.
- Prohibit forced or child labor or other forms of modern slavery.
- Comply with all applicable laws, regulations and union and collective bargaining agreements regarding working hours and other workplace conditions.

We seek to work only with business partners who share this commitment.



? Integrity in Action

Q: During a visit to a supplier, I noticed that their employees appeared younger than the legal working age in that country. What should I do?

A: Raise any concerns about Hexcel suppliers promptly with your supervisor, the Global Sourcing leader or the Law Department. Doing so upholds our Values, our Human Rights Policy and our Supplier Code of Conduct. In addition, the activity may constitute a breach by the supplier of its agreements with Hexcel.

✓ DO

- Ensure that you know how to identify and report all forms of human rights abuse.
- Stay alert for signs of human trafficking and related activities worldwide at Hexcel and in our supply chain, and comply with applicable policies and regulations prohibiting such activities.

✗ DON'T

- Ignore or fail to report anything that you think violates someone's human rights, even if they are working for one of our suppliers.
- Attempt to address an issue yourself outside of the available reporting channels.

+ Resources

Human Rights Policy (CP 1.11)

Hexcel Supplier Code of Conduct

Safeguarding Data Privacy

Our Commitment

We protect the personal information entrusted to us with integrity, prioritizing its confidentiality and security at all times. Access to this data is limited to employees with legitimate business reasons on a need-to-know basis. We only collect necessary information and always follow applicable privacy laws.



What is Personal Information?

“Personal information” generally means any information that identifies or relates to an identifiable person. Examples include:

- Contact information (including email and mobile phone numbers)
- Government-assigned identification numbers
- Financial information
- Banking details
- Salary and other compensation information
- Employment data

✓ DO

- Adhere to our data protection policies and procedures, and follow IT policies and practices for safeguarding personal information.
- Know how to recognize personal information and follow protocols for collecting, handling and storing it.
- Contact dataprivacy@hexcel.com if you have questions about local data privacy laws to ensure personal information is handled properly.

✗ DON'T

- Disclose personal information except as authorized, and even then, only to those obligated to protect that information.
- Access or collect any personal information unless required for legitimate business reasons.
- Store personal information on external storage devices or upload onto cloud-based platforms, such as Google Drive.

? Integrity in Action

Q: One of our vendors has requested the names, titles and email addresses of the employees on my team to offer them a special sales promotion. Is it okay to share this information?

A: No. Even if the request is well-intended, employee information is confidential and should not be shared externally without authorization. Contact the Law Department prior to sharing any personal information about our employees or customers.

+ Resources

Hexcel Data Protection Policy
Hexcel Subject Rights Policy
Data Breach Management Policy
Hexcel Workforce Data Privacy Notice

Our Marketplace

Contracting with the Government

Competing Fairly and Gathering
Competitive Information

Delivering Quality
Products and Services

Exchanging Gifts and
Entertainment Responsibly

Engaging in the Political
Process with Integrity



Contracting with the Government

Our Commitment

We follow all applicable regulations, Company policies and other requirements, including security procedures, that apply to doing business, directly or indirectly, with any government agency. The rules for supplying products and services to the government are stricter and more complex than those that govern our commercial dealings. We are committed to upholding our high standards of integrity and transparency at all times when working with government agencies.



✓ DO

- Retain all records and evidence relating to a government contract until the applicable retention period has ended.
- Familiarize yourself with the legal requirements and Company policies that apply to government contracts.
- Ensure our reports, certifications and statements are accurate, complete and submitted on time.
- Work with Global Sourcing and site procurement to ensure that we flow down any applicable government requirements to our suppliers.

✗ DON'T

- Submit inaccurate cost or pricing data.
- Use government equipment or supplies for a purpose outside of those stated in the contract.
- Attempt to obtain information on another contractor's bid or proposal for a government contract.
- Transmit Controlled Unclassified Information (CUI) other than in accordance with Company policy and procedure.
- Share classified information with anyone who does not have a business need to know and the appropriate government security clearance.

? Integrity in Action

Q: I've been working on a project under a government contract which has fallen behind schedule because there are so many testing requirements. The tests are repetitive, and I don't think skipping some will affect the quality of the final product. Is it okay if I only conduct the tests that I consider absolutely necessary?

A: No. You must conduct all tests required by the government contract and accurately record all results. Failure to follow the test procedures set out in the contract could result in injury to other persons and property. It can also lead to big fines and prevent future contracts.

Q: A government employee that I worked with at a prior company has offered to share the specific criteria that the government will use to evaluate proposals for a potential contract. Can I accept this offer?

A: No. You are not permitted to solicit or accept internal government information about its selection process unless you have received express authorization from the applicable government contracting officer. Contact the Law Department if anyone approaches you with unauthorized internal government information.

+ Resources

Compliance with U.S. Government Contract Standards (CP 1.5)
Contract Review Policy (CP 4.1)
CUI Program Procedure (CP 3.5)

Competing Fairly and Gathering Competitive Information

Our Commitment

We compete for and win business with integrity, based solely on the strength of our products and services. To uphold our Values and protect our reputation, we strictly follow all applicable antitrust and competition laws and support a free and fair marketplace. We keep our business strong by staying informed about our competitors, but we always gather this information lawfully and ethically and treat the confidential information of others as we would want them to treat ours.

✓ DO

- Clearly object to and report any attempt by a competitor to discuss or make agreements about pricing, markets or market share, bidding or other sensitive topics.
- Familiarize yourself with the Hexcel Competition and Antitrust Policy and Guidance.
- Access competitive information only when we have a clear belief that both the receipt and use of the knowledge are lawful and follow Hexcel guidelines.
- Take special care when gathering and using non-public information.

✗ DON'T

- Agree with competitors to set prices or other terms of sale, coordinate bids, or allocate customers, sales territories, product lines, or mandated end user distributor prices.
- Agree with competitors or other regional employers on employee salaries and benefits, or agree not to solicit or hire the other's employees, except with the prior approval of the Law Department.
- Discuss these kinds of topics with competitors even in an informal setting such as a trade show or customer event.





? Integrity in Action

Q: I would never collude with a competitor about the prices of our products. However, I would like to have informal discussions with competitors to understand their pricing. Is that okay?

A: It is not appropriate to have these discussions, even informally to gather information. Under antitrust and competition laws, any agreement, whether formal or informal, or any joint activity involving Hexcel and another party, may violate antitrust and competition laws if the intent is to reduce competition. Unlawful agreements need not take the form of a written contract or comprise express commitments or mutual assurances. Courts can infer agreements based on “loose talk,” informal discussions, or a mere exchange of information between competitors where pricing, terms of sale or other collusion could result.

Q: We are in discussions with a competitor who is also a customer and a supplier. Are we allowed to share pricing and terms that we receive from the competitor to purchase their goods with other Hexcel business units that compete with this company?

A: Supplier pricing should be distributed within Hexcel on a need-to-know basis. When a competitor is selling their products or materials to Hexcel, Global Sourcing should not provide that information to those functions in Hexcel, such as Sales & Marketing, that compete with the competitor.

+ Resources

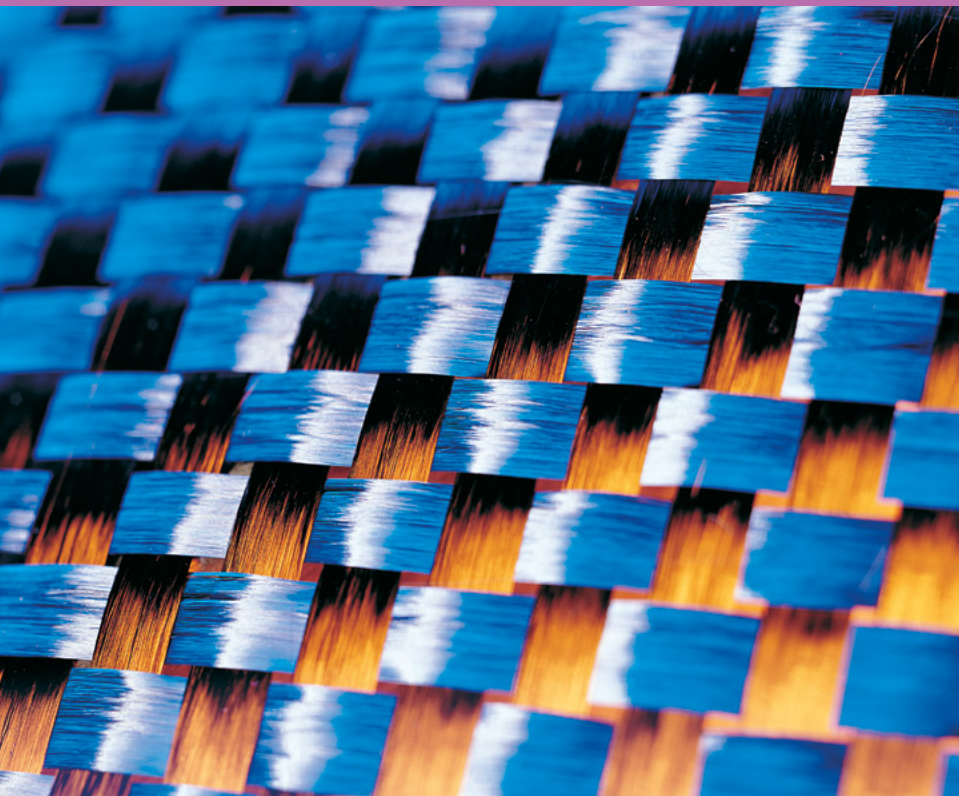
Hexcel Antitrust and Competition Law Guide (CP 1.2)

Anti-Bribery and Anti-Corruption Policy (CP 1.6)

Delivering Quality Products and Services

Our Commitment

We provide our customers with high-quality products and services. Failure to maintain quality standards could disappoint our customers, create liability for Hexcel and damage our reputation. Every Hexcel plant maintains a customized quality system and a goal of on-time delivery with zero defects.



✓ DO

- Foster a culture that encourages innovation to improve the quality and safe manufacture of our products.
- Make sure that everyone in a work area understands their role in meeting Hexcel quality requirements and standards.
- Report concerns about quality immediately.

✗ DON'T

- Ignore or deviate from quality controls, processes, and procedures, or take shortcuts that could sacrifice quality and our ability to meet our or our customer's specifications.
- Fail to disclose and document a known or suspected defect in our products.
- Misrepresent or falsify any quality or production record.

+ Resources

Local Site Quality Manuals
Hexcel Global Business Manual

? Integrity in Action

Q: We are behind schedule for the quarter and are under pressure to increase production. Can we alter a few manufacturing steps to speed things up?

A: When looking at a change to a production process, we want to be sure we do not compromise our work environment or product quality. As for quality, follow the quality standards and specifications for the related product. Also, go through the required approval steps, which sometimes involve customer notification and/or approval. If you have an idea for a process improvement, take it to your manager or your site quality leader. As a team, determine whether the change is workable and consistent with Hexcel's quality standards and customer requirements.

Exchanging Gifts and Entertainment Responsibly

Our Commitment

We earn the trust of our customers and business partners through our performance. Exchanging reasonable gifts and entertainment can build trust and goodwill in our business relationships, but we should never allow these practices to influence our business decisions, or even create the appearance of influence. Gifts and entertainment must have a legitimate business purpose, be reasonable under the circumstances, comply with applicable law and the recipient's policies and procedures, and reflect our Values.



✓ DO

- Respond in kind at a suitable time after accepting entertainment to help avoid any obligation to our host.
- Consult the Law Department before offering any gift, favor or entertainment to any government official or employee of a state-owned entity.
- Accurately and fully document all gifts, meals and entertainment provided to customers or third parties when filing expense reports, in accordance with Hexcel policy.

✗ DON'T

- Offer or accept monetary gifts, such as cash, gift cards or personal discounts, or any other gift of more than modest value.
- Offer or accept any gift that could impair a reasonable person's judgment, or that could embarrass Hexcel if made public.
- Offer or accept any lavish entertainment or entertainment at questionable venues (e.g., gambling or adult entertainment locales).

? Integrity in Action

Q: I would like to send a holiday gift basket valued at \$75 to a customer to express gratitude for their ongoing business. Is this acceptable?

A: Yes. This gift would be acceptable, provided that the customer is not employed by the government and such gifts are infrequent, because it is of "modest" value at less than \$100. However, even gifts of modest value can be a problem if they become frequent, conditional, or violate applicable law or the recipient company's policies.

+ Resources

Gifts and Entertainment Policy (CP 1.16)
Anti-Bribery and Anti-Corruption Policy (CP 1.6)
Conflict of Interest Policy (CP 1.17)
Global Travel Policy

Engaging in the Political Process with Integrity

Our Commitment

We engage in the political process with transparency as a Company and with integrity as private citizens. As individuals, we each have the right to express our beliefs and to take part in political processes. The Company will not interfere with or influence any personal political activities you may undertake. We separate our personal views from Hexcel's interests and follow all laws related to political donations and lobbying.



? Integrity in Action

Q: My supervisor is active in a local political campaign for a ballot proposal. He talks about it all the time and has asked me to donate money to support the campaign. What should I do?

A: You do not have to contribute to the campaign, and your supervisor should not have asked you to do so at work. If you are uncomfortable declining the request by your supervisor, contact Human Resources, the Law Department or use the SafeTalk Helpline.

Q: I want to attend a political fundraiser to foster business relations with a certain company. Can Hexcel cover my costs for this event?

A: You must have approval from the Law Department before going to a political event on behalf of Hexcel or using the resources of Hexcel or the Hexcel PAC (Political Action Committee) for such a cause. You should speak to a member of the Law Department before going in your capacity as a Hexcel employee.

✓ DO

- Make clear that your personal political beliefs are your own, and not those of Hexcel.
- Remember that employee participation in political activities does not imply Hexcel's endorsement and Hexcel will not pay or reimburse personal political contributions.

✗ DON'T

- Use Hexcel funds for any contribution to a candidate for public office, political party or advocacy group, directly or indirectly through a third party, unless permitted under applicable law and approved in writing in advance by the Law Department.
- Use Hexcel funds, personnel time, equipment, supplies or facilities for personal political activities.
- Engage in lobbying activities or the hiring of lobbyists or other third parties on behalf of Hexcel without prior written approval from the Law Department.
- Endorse any political candidate or cause in a manner that others might construe as an endorsement by Hexcel.

+ Resources

Anti-Bribery and Anti-Corruption Policy (CP 1.6)

Political Action Committee Policy (CP 1.19)



Our Global Responsibilities

Protecting the Environment

Conducting International
Trade Legally

Working with Third Parties
and Preventing
Bribery and Corruption

Protecting the Environment

Our Commitment

We strive to be a reliable and sustainable supply chain partner by demonstrating exceptional environmental stewardship in the communities where we operate. We must comply with all applicable environmental laws and regulations wherever we do business. We also minimize the impact of our operations on the environment by being more efficient and sustainable. We have set clear goals for reducing our carbon footprint, reducing our water consumption and minimizing waste.

? Integrity in Action

Q: The instructions I received for logging environmental permit entries results in numbers I believe are misleading because they don't reflect the whole picture. I don't want to create a misleading report. What should I do?

A: Talk with your supervisor or manager, site EHS, or Corporate EHS. It is critical that our data reports are accurate. Your manager or site EHS leader should be able to explain the reporting method. If you still have a concern after that discussion, contact Corporate EHS, the Law Department or the SafeTalk Helpline.

✓ DO

- Handle materials in a safe, compliant manner.
- Vigorously investigate environmental concerns and correct systemic root causes.
- Seek opportunities to reduce natural resource use and minimize waste.
- Make prompt and accurate responses to appropriate information requests from governmental agencies.
- Report potential violations of any environmental permit, law or policy right away. Contact the EHS site manager, plant manager, regional or Corporate EHS, or a member of the Law Department with any questions.

+ Resources

Air Emissions Management Policy (HMS 3.2.1)

Hazardous Materials Management Policy (HMS 3.2.3)

Waste Management Policy (HMS 3.2.4)

Water and Wastewater Management Policy (HMS 3.2.5)

Sustainability Policy (CP 1.14)

✗ DON'T

- Allow inaccuracies or incomplete information on environmental forms, disclosures or permits.
- Look the other way if you suspect any environmental concern.



Conducting International Trade Legally

Our Commitment

We recognize it is a privilege to have our products used around the world. We value that privilege and understand that it comes with the responsibility to comply with applicable laws and regulations governing international trade, such as import and export controls.



? Integrity in Action

Q: What is considered an “export” of U.S.-origin technology?

A: An activity as simple as emailing data to another Hexcel employee who is a foreign national within the U.S. can meet the definition of an export of U.S.-origin technology. The Hexcel Technology Control Plan requires that we protect U.S.-origin technology against unlawful disclosure or “deemed exports” of this type.

Q: When negotiating a contract with a potential customer, I learned that the products Hexcel is exporting would be shipped to a subsequent location in a sanctioned country. Can I proceed with this contract negotiation?

A: No. This practice is known as “re-exporting,” which refers to exporting products that were previously imported into a country without undergoing any significant alteration or transformation. If you are aware of this transfer and do not take steps to prevent it, Hexcel could be held liable. You should immediately contact the Law Department for guidance.

✓ DO

- Follow the international trade controls that apply to Hexcel.
- Properly classify imported goods under relevant tariff codes.
- Declare the correct country of origin for preferential tariff treatment when applicable.
- Obtain the proper license for the export or resale of goods, services or technology.
- Contact the Law Department or the International Trade Compliance team if you have questions about trade regulations.

✗ DON'T

- Market or distribute anything across international borders without understanding the regulations that may apply.
- Fail to comply with export laws or policies—including the Hexcel Technology Control Plan—which can result in severe financial and legal penalties.

+ Resources

Compliance with Export Control Regulations (CP 3.3)

Technology Control Plan (CP 3.4)

Regional (U.S. and Europe) Trade Compliance Policies and Procedures

Working with Third Parties and Preventing Bribery and Corruption

Our Commitment

Hexcel works with a wide variety of third parties, such as customers, suppliers, distributors, agents, resellers and consultants. Our commitment to integrity requires that we honor the anti-corruption and anti-bribery laws and rules of the countries in which we do business. This commitment also requires that we conduct comprehensive due diligence on certain third parties we engage to ensure that they are reputable and have comparable processes to guard against corruption and other non-compliant actions. We never engage in transactions that others could see as attempts to wrongly influence business decisions. To do so goes against Hexcel's Values and may violate laws in the countries where we operate.



What Is Corruption?

Most countries have laws in place to fight corruption. Corruption has many forms but often involves a payoff demanded by or offered to a customer as a trade for a benefit for a person or company. The payoff may involve money or anything else of value. These cases often involve low-level bureaucrats who seek payment to perform routine, non-discretionary acts. Common examples involve permits or visas, or routine customs clearances.

✓ DO

- Learn to identify prohibited activities and how to respond when these situations arise.
- Choose third parties based on Hexcel's needs and their commitment to ethical behavior and values, and monitor their behavior throughout the business relationship.
- Be alert to any risks or subtle requests in your interactions with third parties and report to the Law Department.
- Remember that even the appearance of an improper payment can harm our reputation.

✗ DON'T

- Offer, ask for or accept bribes or kickbacks.
- Offer anything of value directly or indirectly to a customer to unfairly affect a business outcome, including any attempt to obtain or retain business.
- Pay a commission to a third-party agent not documented in an authorized Hexcel agency agreement, or pay more than the legal limit imposed in any country.
- Use a third party to take actions that would violate the law, the Code or Hexcel policy.

? Integrity in Action

Q: Am I permitted to make a small “facilitating payment” to a customs official to move Hexcel in front of other requests to release imported goods?

A: No. Hexcel’s Anti-Bribery and Anti-Corruption Policy (CP 1.6) and most national anti-corruption laws prohibit these types of payment. If a government official, or someone who claims to represent them, asks for such a payment, you should contact the Law Department immediately.

Q: An employee of one of our key customers asked if I could help secure a job interview for his son at Hexcel, suggesting it could be “mutually beneficial.” We have an upcoming bid with this customer. What should I do?

A: Do not agree to help. The phrase “mutually beneficial” implies that the employee might be offering Hexcel an unfair advantage in return for your assistance. In such situations, refer the individual to Human Resources to provide information on open positions and job application procedures.

+ Resources

Anti-Bribery and Anti-Corruption Policy (CP 1.6)

Gifts and Entertainment Policy (CP 1.16)



Our Shareholder Commitments

Guarding Hexcel Assets

Using Technical Resources Responsibly

Using Artificial Intelligence Safely

Using Social Media Wisely

Preventing Fraud and Ensuring
Accurate Financial Disclosures

Protecting Confidential Information

Avoiding Insider Trading

Managing Conflicts of Interest

Protecting Intellectual Property



Guarding Hexcel Assets

Our Commitment

Our hard work has built and secured the many Company assets that support our business performance. We honor these efforts by protecting these assets. Improper or careless handling of our assets can harm Hexcel's brand and stability for the future.

✓ DO

- Use Company assets only for proper business purposes.
- Follow security procedures and be alert to situations that might lead to loss or misuse of Company assets.
- Protect customer or third-party assets, such as tooling, from damage or misuse.
- Protect Hexcel and third-party intellectual property from unauthorized third-party disclosure.
- Report any misuse of our assets to your manager, supervisor, Human Resources or plant controller.

✗ DON'T

- Take, loan, borrow, lease, license, donate, sell, damage, destroy or otherwise dispose of any Hexcel property without specific approval.
- Use Hexcel property for personal activities or other non-Hexcel purposes without permission.
- Improperly alter or change any financial schedule of assets.





What Are Company Assets?

Hexcel's assets take many forms, including:

- Physical assets such as land, buildings, tools, vehicles, equipment, inventory, raw materials and supplies
- Financial assets such as cash, receivables and investments
- Proprietary information and intellectual property such as trade secrets, patents, copyrights and confidential business information
- Contract rights and licenses
- Software and digital data, such as messages stored in or sent through our information and communications systems

? Integrity in Action

Q: What are examples of misuse of Company resources?

A: Some examples include taking products or supplies for personal use, charging personal expenses on a Company credit card, using Company vehicles for unauthorized personal transportation, and reselling or using scrap or waste for your personal or financial gain or use.

Q: I volunteer for a local charity that asked me to print large batches of flyers for its events. Instead of taking them to a print shop, I want to use the printer and paper at the office. Is this wrong? What if I supply the paper?

A: Even if you supplied your own paper, this would still be an improper use of Company assets. This is more than a minor, incidental use. Not only is the paper an expense to the Company, but the cost of toner and wear and tear on the machine for non-work-related tasks creates additional cost for Hexcel.

+ Resources

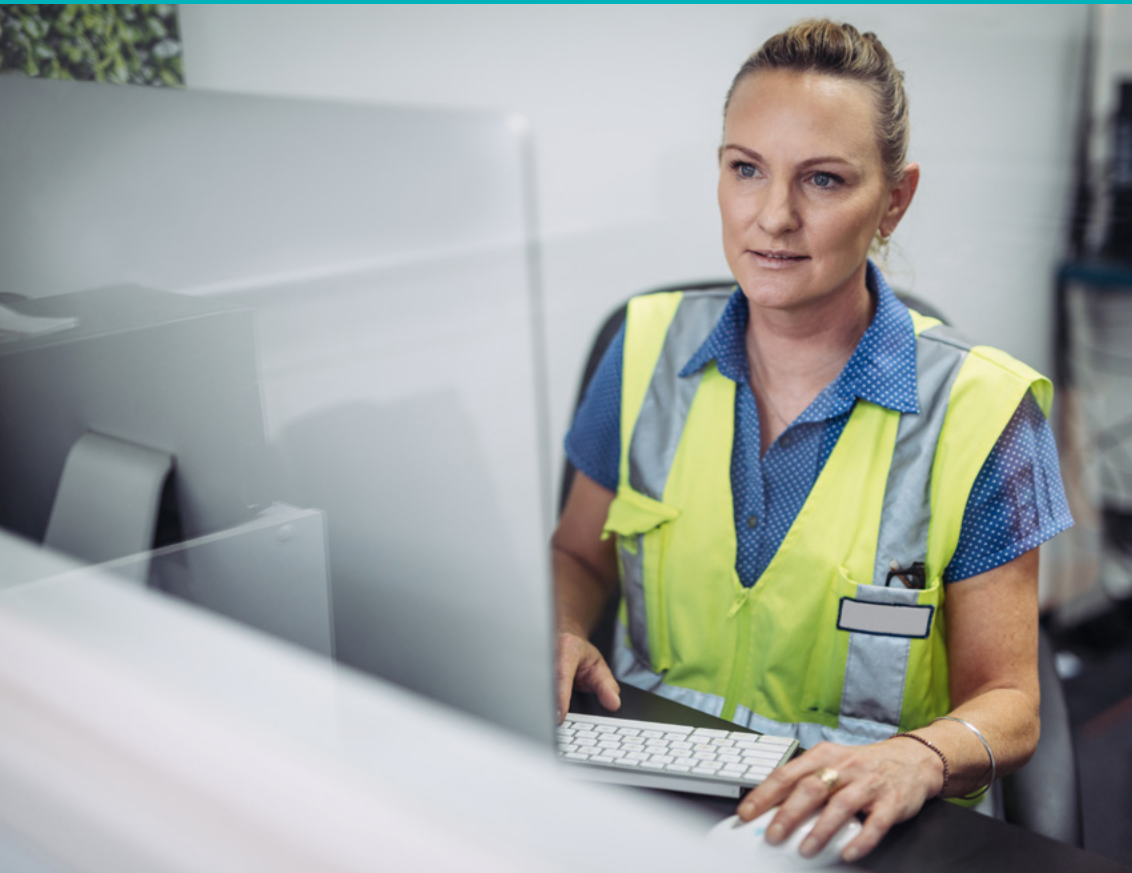
Hexcel Asset Management Security Policy (A.8)

Hexcel Acceptable Use Policy (A.20)

Using Technical Resources Responsibly

Our Commitment

Hexcel's computer systems, mobile phones and other technical resources, such as email, online storage, online applications and data, are valuable Company assets that help us do our best work. We use our computer systems and communication resources responsibly and protect the security and privacy of our information systems and data.



✓ DO

- Limit personal use of Company computers, email and internet services.
- Treat all data stored on Hexcel systems as the property of Hexcel.
- Follow all security measures related to handling, using, transmitting and storing Hexcel employee, customer and vendor information.
- Keep access codes and passwords safe and secure on all Company devices at work and while traveling.
- Report any suspected security and privacy incidents right away.

✗ DON'T

- Assume privacy in your use of Hexcel systems or store excessive personal information on Hexcel systems.
- Click on or respond to questionable emails or links, even from sources that appear to be internal to Hexcel.
- Use provocative or confrontational language in your electronic correspondence.
- Install and use prohibited applications (e.g., TikTok) or inappropriate applications or websites (e.g., adult content, gambling, etc.)
- Allow non-employees to use Hexcel computers for any reason.



? Integrity in Action

Q: Can I use my Hexcel-provided phone as my personal cell phone?

A: Yes, you may. Be aware, however, that a Hexcel-provided device, such as an iPhone, can be accessed by Hexcel in certain circumstances, so privacy should not be expected, and your use of the phone must be appropriate, i.e., no visiting of inappropriate sites via the device (e.g., adult content, gambling, etc.) and no use of the phone for illegal, inappropriate or illicit activities.

Q: Can I use my Hexcel computer to check my Facebook page during my break time?

A: Yes, if you are in a location that does not block access to Facebook. Just stick to the Company policy that permits the limited personal use of IT assets, expecting such use to be minimal. Also, you may not use Hexcel IT resources for prohibited activities such as gambling, cyber-harassment, or accessing improper websites or chat rooms.

Q: I received a request from someone claiming to be IT to share my login credentials to update my computer. I suspect this might be an attempted cyberattack. What should I do?

A: If anyone claiming to be from IT asks for more than your username, hang up immediately and contact Hexcel IT. This rule also applies to email and chat communications. Hexcel IT has several resources to help identify potential threats to information security; visit them on the Hexcel employee SharePoint site. To report a suspicious issue, email cyberdetect@hexcel.com.

+ Resources

Hexcel Acceptable Use Policy (A.20)

Hexcel Compliance Security Policy (A.18)

Information Security Incident Management Policy (A.16)

Using Artificial Intelligence Safely

Our Commitment

The area of artificial intelligence (AI) is evolving rapidly, bringing new capabilities (and potential dangers) nearly every day. Hexcel embraces the responsible use of AI to enhance productivity, expertise and learning when used in accordance with Hexcel's acceptable use policies and guidelines.



✓ DO

- Use only AI tools provided by or authorized by Hexcel IT.
- Understand the licensing associated with the tools being used.
- Exercise caution when asking questions on an AI system relating to Hexcel internal, confidential or proprietary information.

✗ DON'T

- Use generative AI tools not specifically authorized by Hexcel IT for Hexcel business.
- Use any employee personal data, Hexcel data, or customer/supplier data with generative AI tools except as expressly permitted by Hexcel policy.

? Integrity in Action

Q: I regularly use ChatGPT to analyze the quality data on our products. It saves me so much time. Does this breach Company policy?

A: Yes, using ChatGPT (or any other unauthorized AI tool) for this purpose breaches Company policy. You may only use AI software that has been authorized by Hexcel. Sharing confidential Hexcel information on ChatGPT is not secure and violates confidentiality protocols. Instead, you should use the AI software Copilot on Microsoft Edge. For more information, contact the IT Service Desk.

Q: Is it okay for me to use my own AI software (like ChatGPT) to research Hexcel products and services at home, where these tools are not blocked?

A: No, you should not. AI tools are designed to track who you are and what you ask. You won't know the questions others are asking and won't be aware that the AI tools are piecing together data that may disclose important internal Hexcel information.

+ Resources

Artificial Intelligence Use Policy

Using Social Media Wisely

Our Commitment

When using social media, we have a responsibility to safeguard the Company's image, respect our co-workers, and protect Hexcel's confidential and proprietary information. Social media should always be used in a way that considers any potential impact to Hexcel's values and reputation and is in compliance with Hexcel's Social Media and Computing Policy and related policies.

✓ DO

- Ask yourself if your online content is appropriate, respectful and truthful before sharing.
- Make it clear you are speaking for yourself and not on behalf of Hexcel when posting on social media.
- Be transparent—identify yourself by name and, if appropriate, explain your role at Hexcel.

✗ DON'T

- Share information about Hexcel, any employee, or any customer or supplier that is confidential or proprietary or would violate the privacy rights of Hexcel employees.
- Engage in inflammatory or derogatory discussions about Hexcel, fellow employees, service providers, suppliers, customers or competitors.
- Visit websites that are specifically prohibited by Hexcel policy.

+ Resources

External Communications Policy (CP 2.2)

Social Media and Computing Policy (CP 2.03)



? Integrity in Action

Q: My facility just won a large contract. Can I offer congratulations on social media?

A: Yes, as long as you limit your post to specific information that Hexcel has made public, either through a news release, a post on social media or a public regulatory filing.

Q: Can I post a picture of myself with my colleagues at one of Hexcel's facilities?

A: Posting photos of Hexcel workspaces is prohibited unless you have obtained approval from Corporate Communications. Additionally, you must receive consent from your colleagues before writing about or displaying any images of them that might be considered a breach of their privacy.

Preventing Fraud and Ensuring Accurate Financial Disclosures

Our Commitment

We are honest in all of our business dealings, financial reporting and record keeping. We depend on accurate records to measure our performance, inform management decisions and produce reports for investors, regulators and other stakeholders. Keeping good records creates an environment that discourages fraud and makes improper accounting practices easier to spot and address. Our stakeholders also expect us to maintain timely, accurate and complete records and disclose financial information and reports that fully comply with applicable law.



✓ DO

- Know and be alert for signs of fraud.
- Record all assets, liabilities, revenues, expenses and business transactions promptly, completely, accurately and within the proper accounting period.
- Take reasonable steps to confirm that each customer is involved in genuine business activities and provides funds from legitimate sources.
- Report concerns about fraud, waste or misuse to your plant controller, Hexcel's Chief Accounting Officer, the Law Department, the SafeTalk Helpline or to Hexcel's Audit Committee.

✗ DON'T

- Use or include imprecise wording, guesswork, personal commentary or conclusions beyond your expertise in the records you create.
- Do anything that could create even the appearance of fraudulent activity.
- Set up or maintain for any purpose any cash funds or other assets or liabilities that are secret, unauthorized or unrecorded.
- Approve transactions outside the scope of your delegated authority.



What Is Fraud?

Examples of fraud include:

- Misusing or misappropriating Company funds or other assets
- Falsifying Company records, documents or financial statements
- Committing forgery
- Providing or receiving kickbacks or taking part in similar schemes
- Altering manufacturing, quality or inventory data to meet operational goals
- Presenting false medical information to obtain disability or other benefits
- Over-reporting time worked to receive more pay or to avoid discipline

? Integrity in Action

Q: I saw a co-worker sign off on an inspection report when he hadn't actually done the inspection. What should I do?

A: You should report what you saw to your manager, the Law Department or the SafeTalk Helpline. Signing off on the report when he had not actually done the inspection would be considered a form of falsifying records and would violate our Code.

Q: A third party engaged by Hexcel is contractually required to submit, along with its invoices, monthly reports of the services it has provided. Based on my interactions with this third party, I believe that the information in a report it submitted is not true or does not completely describe the third party's activities. What should I do?

A: If you have concerns about records or reports submitted by a third party, no matter how trivial, raise the matter through one of our available reporting channels immediately. If a third party submits an inaccurate or incomplete activity report, we do not know whether Hexcel funds are being used properly.

+ Resources

Anti-Bribery and Anti-Corruption Policy (CP 1.6)

Contract Review Policy (CP 4.1)

Protecting Confidential Information

Our Commitment

Through our work, we may learn facts about Hexcel's business plans, operations, trade secrets and other confidential information. Our business partners also entrust their confidential information to us. We safeguard this information against unauthorized disclosure and misuse. We always protect our business partners' confidential and proprietary information as we would our own.



✓ DO

- Limit access to confidential information within Hexcel to those who need to know the information to do their jobs.
- Be cautious in maintaining confidential information using appropriate password protection, encryption and secure storage.
- Use secure receptacles to dispose of documents containing confidential or personal information.
- Direct all inquiries from the financial community or for financial data to the Chief Financial Officer or Investor Relations.
- Direct requests (other than for financial information) from the media to Corporate Communications or to the Law Department.

✗ DON'T

- Share confidential information with current or potential business partners unless they need to know the information and an approved non-disclosure agreement has been put in place.
- Talk about confidential information in public areas like airplanes, elevators and restaurants. This applies whether the discussion is in-person or on mobile phones or social media sites.
- Supply financial data (including forecasts or forward-looking statements) in business proposals or other documents shared outside Hexcel without the approval of the chief financial officer.
- Use confidential information for your personal gain or to benefit anyone outside of Hexcel.



? Integrity in Action

Q: Last week, during a business lunch with a potential supplier in a busy restaurant, my supervisor mentioned a new R&T project that Hexcel will announce in a few weeks. Luckily, the waiter came to take our order, and we never came back to the project. Would I have been right to interrupt my supervisor if I believed he was putting confidential information at risk?

A: You were right to be cautious. Sharing the information with the potential supplier may or may not have been a problem, depending on whether the supplier had signed a non-disclosure agreement and had a “need to know” the information. But we must be careful not to discuss confidential information in public. If the discussion continued, one way to handle it would be to suggest waiting until you all returned to the office, which would also have given you the chance to understand better whether it was appropriate to discuss the R&T project with the supplier.

+ Resources

Information Disclosure Policy (CP 2.1)

Hexcel Acceptable Use Policy (A.20)

Social Media and Computing Policy (CP 2.03)

Clean Desk Policy (CP 4.06)

Avoiding Insider Trading

Our Commitment

We must never use material non-public information about Hexcel or its business partners to buy or sell securities. The misuse of non-public information goes against our Values. It is also against the law. If regulators find unlawful trading has occurred, enforcement is rigorous and penalties are severe. Such unlawful trading could subject you to criminal liability.

✓ DO

- Learn to recognize when you may be in possession of material non-public information about Hexcel or another company.
- Get help from the Law Department if you are unsure if you possess material non-public information or how to comply with insider trading rules.
- Follow all Hexcel Insider Trading Policy requirements when transacting in the securities of Hexcel or its business partners.

✗ DON'T

- Trade in the securities of Hexcel or another company when in possession of material non-public information relating to such company.
- Advise, encourage, “tip off” or otherwise cause others to trade in the securities of Hexcel or another company when in possession of material non-public information.
- Share or disclose material non-public information of Hexcel or another company unless authorized to do so.





What Is Material Non-Public Information?

Deciding whether a piece of news or information could be material requires a lot of judgment. Two broad guidelines can be helpful to consider. First, is there a substantial likelihood that a reasonable investor would consider the news important to their decision to buy, sell or hold an investment? Second, if the news became public, could it have an effect, either positive or negative, on the market price of Hexcel securities?

Applying these guidelines is difficult since they involve future events. Meanwhile, the risks and costs of the improper handling of material information can be severe. Consult with the Law Department before concluding that a piece of information is not material. Also, always presume the following to be material:

- Earnings forecasts or estimates
- Unpublished financial data
- Pending acquisitions or sales of business units
- Major changes in management or strategies
- Significant new contracts, partnerships, joint ventures or products, or the loss of a major contract
- Decisions to expand or reduce operations

? Integrity in Action

Q: I just overheard a conversation in the break room about a possible acquisition that could positively affect Hexcel stock prices. Can I share this information with my father-in-law?

A: No, this is considered “tipping” and is one of the most common forms of insider trading, which is strictly forbidden. Tipping is when you provide material non-public information about Hexcel to someone outside the Company, who uses it to trade Hexcel shares. Even if you told your father-in-law not to act on the information, if he did use it to trade shares, both of you could be found guilty of insider trading.

+ Resources

Insider Trading Policy (CP 1.3)

Managing Conflicts of Interest

Our Commitment

We make decisions and choose actions in the best interest of Hexcel, rather than serving our individual best interests or seeking personal gain. Conflicts of interest, whether real or perceived, create doubt as to our ability to make sound decisions. Our customers, service providers, suppliers and co-workers expect and deserve our best judgment.



What Are Conflicts of Interest?

A conflict of interest occurs when our private interests interfere, or appear to do so, with Hexcel's interests. Common sources of conflicts include:

- Relatives and friends
- Personal or family financial interests
- Outside employment
- Competing with Hexcel for a business opportunity
- Gifts and entertainment

✓ DO

- Learn to identify potential conflicts of interest and know how to avoid or resolve them.
- Disclose as soon as you discover any personal interest you or your immediate family members may have in any transaction where Hexcel is or is about to become a party.
- Remove yourself from the decision-making process when a decision for Hexcel is required and you have a personal or family interest in the outcome.

✗ DON'T

- Conceal information on any actual or potential conflict of interest.
- Place yourself in the position of hiring or supervising a family member or close personal friend.
- Use your Hexcel position to get favored treatment for yourself or others with whom you have a personal relationship, including your immediate family.

+ Resources

Conflict of Interest Policy (CP 1.17)

Gifts and Entertainment Policy (CP 1.16)

? Integrity in Action

Q: My sister-in-law runs a successful parts business, and I can arrange special rates for Hexcel that are lower than any competitor. May I use this service?

A: No, not without full disclosure of your relationship. However good your sister-in-law's products are, and however low her rates, it would look as though you had allowed your relationship with her to sway your judgment. Disclose your relationship and remove yourself from the decision-making process. Also, make sure that your sister-in-law has no Hexcel proprietary information that is not available to other bidders. That way, your relative can compete for the business in the usual manner. If she is as good as you claim, she will win the business on merit.

Protecting Intellectual Property

Our Commitment

Our business plans, trademarks, formulas, processes and other types of intellectual property (IP) are vital for developing new products and services. We safeguard Hexcel's IP and ensure its proper use. If disclosed, it could be very valuable to our competitors and highly damaging to both our customers and the Company.



✓ DO

- Alert the Law Department as soon as you realize any known or suspected misuse of Hexcel IP.
- Treat others' IP (for instance, customers and suppliers) in the same way we expect ours to be treated.
- Notify the Law Department of any invention or other IP that you develop to determine whether it is patentable or worthy of special protection.

✗ DON'T

- Allow a third party to use Hexcel IP without proper approval.
- Use a third party's IP without their approval, including using a customer or supplier's trademark in our promotional materials, using another firm's copyrighted work or published research or operating unlicensed software.



+ Resources

Trademark Usage Policy (CP 4.5)

Technology Control Plan (CP 3.4)

What Is Intellectual Property (IP)?

Examples of Hexcel IP include:

- Trademarks
- Brands
- Package designs
- Logos
- Copyrights
- Inventions
- Patents
- Trade secrets
- Know-how

Hexcel IP also includes the work product employees create or discover as part of their Hexcel employment. Work product includes:

- New inventions or processes
- Works authored, including new or improved software
- Technology advances
- Unique solutions to business problems

? Integrity in Action

Q: While working for Hexcel, I created a new composite process. The Company never used it. I am leaving Hexcel to start a new business. May I use that process at my new venture?

A: No, unless Hexcel grants consent, through the Law Department, and enters into a license agreement with your new business. The process you created as a Hexcel employee belongs to Hexcel. After your Hexcel employment ends, keeping or using any such IP without proper consent may violate various laws in your country.



Hexcel Corporation
Law Department
281 Tresser Blvd. 16th Floor
Stamford, CT 06901 USA

Revised 2025
© Hexcel. All rights reserved.