

	CORPORATE POLICY	EFFECTIVE DATE: Sept. 26, 2024
		POLICY No. 1.11
Subject: Human Rights		

Related Policies:

CP 1.1 - Code of Business Conduct

CP 1.12 - Prohibition of Abusive Conduct, Discrimination, Harassment, and Retaliation

CP 1.13 - Career Management, Learning & Development Policy

CP 1.14 – Sustainability Policy

Forms:

N/A

Scope/Applicability

This policy on human rights (the “Policy”) applies to all Hexcel operations and subsidiaries worldwide. Hexcel also requires suppliers to uphold internationally recognized human rights as stated in our Supplier Code of Conduct.

1. Purpose

This Human Rights Policy sets out how the Company ensures respect for human rights and compliance with applicable law by having policies and processes in place to identify, prevent, mitigate and account for potential adverse human rights impacts. At Hexcel, we believe that respect for human rights is an essential principle. This principle is critical to our ability to maintain positive relationships with employees, those in our value chain, and the communities in which we operate, and is the foundation for our Human Rights Policy. We make every effort to 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. Hexcel’s Human Rights Policy aligns with our Code of Business Conduct as well as our corporate policies and/or guidelines relating to diversity, equity, inclusion and belonging, environment, health and safety, and employee relations.

Hexcel recognizes the importance of maintaining and promoting the fundamental human rights of employees by conducting training and operating under programs and policies that:

- Promote a workplace free of discrimination and harassment;
- Prohibit child labor, forced labor, and human trafficking;

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- Provide fair and equitable wages, benefits, and other conditions of employment in accordance with local laws;
- Provide safe working conditions; and
- Recognize employees’ rights to freedom of association.

2. Persons Covered by this Policy

This Policy applies to each employee, officer and director of Hexcel and its subsidiaries. Among others, we view the following constituents as stakeholders in our Human Rights Policy: Shareholders, Employees, Communities, Customers, Contractors, Vendors and Suppliers, Governments, and Hexcel Unions.

3. Definitions

For the purpose of this Policy, any action based on membership in a “Protected Category” means action on the basis of an individual’s race, color, religion, creed, national or ethnic origin, ancestry, genetic information, sex (including pregnancy), age, disability (intellectual, physical or learning), HIV/AIDs status, Hepatitis C status, sexual orientation, gender (including gender identity and expression), marital status, protected veteran or military status, citizenship status or any other characteristic protected by applicable law. **Some countries designate membership in other categories as being protected, and in such cases, the definition of Protected Category refers to those additional categories as well. Please contact your local HR Manager or a member of the Law Department if you have any questions regarding your national Protected Categories.**

4. Working Conditions

We believe that every employee has the right to safe and decent working conditions. We are committed to ensuring our employees have appropriate working hours and wages, treating others with respect and dignity, and maintaining effective oversight of occupational health and safety, as outlined in the sections below.

5. Discrimination and Harassment

We believe every employee has the right to be treated fairly and deserves a safe working environment free from fear or intimidation. Hexcel prohibits discrimination based on age, race, color, religion, sex, national origin, marital status, disability, citizenship, sexual orientation, gender identity or expression, military service, or other characteristic of a Protected Category as defined by law. Hexcel does not accept abusive conduct or harassment. We commit to providing

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a workplace free from harassment and bullying and where no employee has to tolerate offensive or disrespectful conduct.

6. Diversity, Equity, Inclusion and Belonging

We are “One Hexcel” and we thrive on the diversity each of us brings to the Company. Hexcel is committed to ensuring inclusive and equitable experiences, beginning with recruitment, and lasting throughout the entire employment journey. Our high-performing organization is built on the foundation of a diverse and inclusive workforce that promotes a sense of belonging for all employees. We foster activities where individuals and teams are able to blend a wide range of talents, preferences and perspectives in pursuit of a shared purpose. Employees are expected to be open to dialogue and respectful of others’ differences and to participate in open and honest communication as well as assuming the positive intent of others.

7. Forced Labor, Human Trafficking and Child Labor

With respect to any of its operations, the Company will not use forced or involuntary labor, whether bonded, prison, military, compulsory or indentured labor, including debt servitude or human trafficking. Hexcel will not employ child labor, consistent with the principals relevant to United States and international laws. Specifically, the Company prohibits the hiring of individuals under the age of seventeen (17) or the local legal minimum working age or the compulsory schooling age, whichever is higher.

8. Freedom of Association and Social Dialogue

Hexcel respects employees’ right to join, form or not to join a labor union without fear of reprisal, intimidation or harassment. Where employees are represented by a legally recognized union, we are committed to establishing a constructive dialogue with their freely chosen representatives and bargaining in good faith with such representatives. We promote social dialogue to ensure we maintain an open and trusting working environment.

9. Workplace Safety

Globally, our policy is to provide a safe and healthy workplace and comply with all applicable safety and health laws and regulations as well as internal requirements. We work to provide and maintain a safe, healthy and productive workplace, in consultation with our employees, by addressing and remediating identified risks of accidents, injury and health impacts.

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10. Working Hours, Wages, and Benefits

The Company compensates employees competitively relative to our industry and local labor markets and in accordance with terms of applicable collective bargaining agreements. We work to ensure full compliance with applicable wage, work hours, overtime and benefit laws.

11. Local Communities & Other Stakeholders

Hexcel respects the rights of local communities, including the human right to land and water, as consistent with international human rights standards. We monitor the impact of our business on communities and engage in meaningful dialogue with local stakeholders through involvement in volunteerism and charitable programs. Where appropriate, we are committed to engaging in dialogue with stakeholders on human rights issues related to our business and incorporating stakeholder feedback as we evolve this Policy.

12. Changes to this Policy

We continuously monitor the effectiveness of our efforts and as such, we may amend this Policy from time to time. If we amend the Policy, we will post an updated version on the Corporate Policy section of the internal Hexcel Law Department website as well as the external Hexcel website.

13. Inquiries

Any employee who believes a conflict exists or has come to exist between the language of this Policy and the laws, regulations or other requirements of the place where that employee works, or who has a question about this Policy or would like to confidentially report a potential violation of this Policy, should raise those questions and concerns with their direct manager, local management, Human Resources, to the Hexcel Compliance Officer, or through reporting to Hexcel’s SafeTalk Helpline.

SUPERSEDES: N/A	APPROVED BY: /s/ <u>Gail E. Lehman</u> General Counsel
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EXHIBIT A – SAFE TALK HELPLINE REPORTING METHODS

Via Email: www.hexcel.ethicspoint.com



Via Mobile Phone: www.hexcel.navexone.com or by QR Code:

Via Phone:

Country	Local Phone Number(s)	Additional Number (via ATT Access)
Austria	0800 068742	
Belgium	0800 70 183	
China	400 120 4706	
France	0 805 08 01 01	
Germany	0800 1809036	
India	000 117 (ATT Access)	1 844 929 1438
Italy	800-172-444 (ATT Access)	1 844 929 1438
Japan	0034-811-011 (ATT Access)	1 844 929 1438
Malaysia	Not Available	
Morocco	Not Available	
Spain	900 999 393	
United Kingdom	0800 098 8478	
United States	1 844 929 1438	

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EXHIBIT B – HUMAN RIGHTS DUE DILIGENCE PROCESSES

We leverage the following programs and processes to fulfill our human rights due diligence obligations:

Training

All employees are required to act in accordance with the Hexcel Code of Business Conduct, and we deliver Code of Business Conduct training for 100% of our employees every three years, as well as additional compliance training on topics relevant to the employee’s function. Hexcel also provides employee training to support compliance with human and labor rights.

Reporting Procedure and Remediation

Hexcel has established a confidential SafeTalk Help Line to receive reports of misconduct or noncompliance, including human rights violations. The SafeTalk Help Line is managed by an independent service provider and is available 24 hours a day, seven days a week for use by all employees regardless of where they live or what language they speak. All Hexcel SafeTalk Help Line reports and calls are reviewed and responded to in a timely manner. The SafeTalk Help Line is accessible via phone, the internet or via mobile phone using the QR code, with details provided in Exhibit A.

Hexcel has zero tolerance for any form of retaliation against those who engage in good-faith reporting, and those who demonstrate retaliatory behavior may be subject to disciplinary action, up to and including termination.

Preventative Measures

We communicate our human rights expectations to suppliers through our Supplier Code of Conduct and contractual obligations, which require compliance with local and national labor laws regarding compensation and working hours, and prohibit discrimination, child labor, or forced labor practices. In addition, we conduct a rigorous risk assessment process for priority suppliers annually, including screening against criteria to evaluate social risk.

Supplier Non-Compliance & Remediation

If Hexcel becomes aware of a potential breach of human rights, we will engage the supplier, support the identification of appropriate corrective actions, and monitor the implementation of such actions. However, Hexcel reserves the right, in its sole discretion, to discontinue any relationship with a supplier for non-adherence with Hexcel requirements and applicable rules and regulations.