

2019 Statement of Compliance with the Modern Slavery Act

This statement is made pursuant to s.54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 31st December 2019.

Modern slavery is a crime and a violation of human rights. It encompasses slavery, servitude, human trafficking and forced or compulsory labour. Intergraph (UK) Limited has a zero-tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

Our business

Intergraph (UK) Limited is part of Hexagon AB, a leading global provider of information technology solutions that drive productivity and quality across geospatial and industrial landscapes. Hexagon AB has approximately 18,000 employees in 50 countries and is the ultimate parent company of an international network of subsidiaries, which operate under Hexagon AB's Global Code of Conduct. Each subsidiary operates as a separate legal entity. This statement relates to the UK entity, Intergraph (UK) Limited and its supply chain.

Our organisational structure

Intergraph (UK) Limited's suppliers are spread across a wide range of sectors, including engineering, construction and design software. In addition, the firm works with a number of professionals, consultants, and contractors.

Our suppliers

We have zero tolerance to slavery and human trafficking. We communicate our Global Code of Conduct to our suppliers, and expect all those in our supply chain and contractors to comply with our values and ethics as set out therein. We carry out due diligence where relevant and require our suppliers to comply with the Hexagon AB's Global Code of Conduct (or equivalent) to ensure that they meet our standards by virtue of operational provisions in our contracts.

Due diligence

We select suppliers based on an assessment of the overall competitiveness of the offering. This assessment includes several factors in addition to financial aspects, such as competency, technology, process, management, logistics, leadership and investments in continuous improvements. Although the competitiveness of the company's offer is the most decisive factor, our aim is to give particular preference to suppliers that are in the forefront of environmental focus and work and that live up to the goals and values expressed in the United Nations Global Compact's ten principles in the areas of human rights, labour rights, environment and anti-corruption. We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. We carry out due diligence where relevant and require our suppliers to comply with the Hexagon AB Global Code of Conduct (or equivalent) to ensure that they meet our standards by virtue of operational provisions in our contracts. These policies include:

- Anti-corruption compliance programme. This ensures compliance with applicable anti-bribery laws, rules and regulations. It includes procedures, training and other tools that are designed to strengthen compliance, and help employees to avoid inadvertent violations. It is applicable to all directors, executive officers and employees, as well as all person who perform services for, or on behalf of, the company, regardless of position, nationality or location.
- Anti-trust and competition. This gives practical guidance on permitted and prohibited activities.
- Code of Business Conduct and Ethics. This gives guidance for the requirements and conduct expected from employees. It covers areas such as fair employment and competition, privacy and prevention of discrimination and harassment.
- Whistleblowing policy. We operate a whistleblowing hotline so that all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals.
- The Supplier Code requires applicable suppliers to have adequate management systems and controls in place, commensurate with the size and nature of their business, to ensure compliance with its terms. To the extent applicable, suppliers are required to ensure their own suppliers agree to adhere to standards comparable to those set forth in the Supplier Code. Intergraph (UK) Limited reserves the right to verify compliance with the Supplier Code using mechanisms including, but not limited to, self-assessments, surveys, site-visits or audits.

If a supplier fails to comply with the Supplier Code, Intergraph (UK) Limited will engage with the supplier and take appropriate corrective action. In the event of significant or recurring breaches, without corrective actions and remedy, or lack of cooperation, Intergraph (UK) Limited reserves the right to reduce or terminate business with a supplier.

Training

Employees are required to keep themselves apprised of updates to the Global Code of Conduct and training may be proposed by senior management.

Every manager is required to ensure their employees are fully aware of the Global Code of Conduct and to take steps to monitor compliance with the Ethics & Compliance System. The company provides annual reminders to its employees about the Global Code of Conduct and the Ethics & Compliance System, and provides periodic on-line and in-person training on the Global Code of Conduct and on specific compliance programme requirements as needed.

The Supplier Code requires suppliers to ensure their personnel, and those of their suppliers, are adequately trained on its requirements.

Our performance indicators

Employees and suppliers who witness or suspect violations of the Global Code of Conduct, laws or other regulations are encouraged and required to report their concerns to the compliance team via email at compliance@hexagon.com or directly to the General Counsel and Chief Compliance Officer.

We will monitor the effectiveness of measures we are taking to prevent modern slavery within our business and supply chain by the number of reports, if any, received from employees, suppliers, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.

Next steps

Following a review of the effectiveness of the policy we intend to take the following steps:

- Implement our policies in full.
- Prioritise risks
- Implement our Code of Conduct with suppliers and review contractor and supplier contracts.
- Monitor and record any incidents or allegations across our supply chains.
- Provide continued support and training to all employees on our Modern Slavery Policy.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Group's modern slavery and human trafficking statement for the financial year ending 31st December 2019 as approved by the Board.

Approval

This statement was approved by the Board of Directors on 19 August 2020.

Name Michael Scott Moore

Signature *Scott Moore* (Director)