



## Trimble Conflict Minerals Supplier Requirements

Conflict Minerals is addressed in Section 1502 of the “Dodd-Frank Wall Street Reform Act”, which was finalized on August 22, 2012. Rule 13(p)-1 under the Securities and Exchange Act 934 intends to address human rights violations (forced labor, child labor, murder, other hostilities related to the mining operation in Africa) arising in the eastern Democratic Republic of the Congo (DRC) or its nine adjoining country. Trimble is committed to ensuring that the materials used in our products do not directly or indirectly fund these violence and human rights abuses.

Trimble adopted the Responsible Business Alliance’s (“RBA”) for its Supplier Code of Conduct ([http://www.responsiblebusiness.org/media/docs/RBACodeofConduct6.0\\_English.pdf](http://www.responsiblebusiness.org/media/docs/RBACodeofConduct6.0_English.pdf)), which sets forth the importance and principles of ethical business practice, such as responsible sourcing, that all of Trimble’s suppliers are required to comply. Trimble is also a member of the industry initiative, Responsible Minerals Initiative (“RMI”) and use their Conflict Minerals Reporting Template (“CMRT”) as a standard form to collect information from our Conflict Minerals suppliers (“in-scope suppliers”).

Trimble has developed a partnership with Assent Compliance, who supports in notifying, collecting, and validating the correctness of the CMRT received from in-scope suppliers. They also provide additional training in completing the CMRT. Trimble requests our in-scope suppliers to acknowledge any new communication, you may receive from Assent Compliance on behalf of Trimble.

To ensure the practice of responsible sourcing, Trimble requires in-scope suppliers to comply with our Conflict Minerals Program. In-Scope supplier’s compliance with the program include (but not limited to):

- *Providing in a timely manner the complete and updated CMRT free of errors and duplicates with identified smelters during our **annual** CMRT collection **beginning in July and ending in December**. Suppliers must use the latest version of the CMRT downloadable at the RMI website (<http://www.responsiblemineralsinitiative.org/conflict-minerals-reporting-template/>)*
- *Adopting a Conflict Minerals Policy (or similar) committed to the practice of conflict free products and responsible sourcing*
- *Sourcing from smelters who are compliant (or working towards compliance) with the Responsible Minerals Assurance Process (“RMAP”) or similar conflict free program.*
- *Having a due diligence process which follows (or similar to) the **Organization for Economic Cooperation and Development Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas** (<http://www.oecd.org/corporate/mne/mining.htm>). Trimble identifies “**High Risk**” as those suppliers with smelters who are: (i) Located in the covered countries or conflicted countries; (ii) Non conformant audit result; (iii) Not interested in participating in the RMAP or similar program; (iv) Linked with unethical activities or has a history of unethical activities.*
- *Working with industry initiatives to verify the smelter’s audit status or to help engage with smelters that are not part of a conflict free program*
- *Informing your supply chain regarding these requirements to ensure the practice of responsible sourcing and compliance with Trimble’s Conflict Minerals Program*

For any questions, please email Trimble’s Conflict Minerals Team: [conflict\\_minerals@trimble.com](mailto:conflict_minerals@trimble.com). Thank you for your support.

Regards,  
Trimble’s Conflict Minerals Team