Trimble

Code of Business Conduct and Ethics

Driving success by living our values

Table of contents

01

A message from our CEO

03

02

Introduction to the Code

04
Trimble mission, vision and values

05
About our Code

06
Code Q&A

07
Responsibilities under this Code

08
Good decision-making

09
Speak up and seek guidance

10
Retaliation is prohibited

03

Respect in the workplace

11
Equal employment opportunity; no harassment or discrimination

12
Workplace health and safety

04

How we do business

13
Fair competition and fair dealing

15
Conflicts of interest

16
Gifts and hospitality

17
Public communications and disclosures

18
Books and records

19
Government relationships and contracts

05

Compliance

20
Compliance with laws and regulations

21
Preventing corruption and improper payments

22
Corporate compliance

23
Sourcing and supply chain compliance

24
Insider trading

25
Political contributions and activities

06

Protecting our assets

26
Confidentiality and privacy

28
Use of Trimble assets and resources

29
Protecting intellectual property

A message from **Rob Painter**

Rob Painter
President and Chief Executive Officer
Trimble Inc.

Since 1978, Trimble has been transforming the ways people move, build and live. Core technologies in positioning, modeling and data analytics connect the digital and physical worlds to improve our customers' productivity, quality, safety, transparency and sustainability. Our unique ability to create customer value enables us to create value for our shareholders while allowing us to continuously invest back into our business and people.

Trimble is a purpose-driven company, and our values are the bedrock of our success. They are the central, underlying philosophies that guide and influence how we interact with each other and our partners, customers, communities and shareholders.

Our Code of Business Conduct and Ethics holds us all to high ethical standards and integrity in our beliefs and actions. With the growing complexity of the world in which we operate, it is more vital than ever to follow a code that serves as an uncompromising "guiding light" steering us towards doing what's right.

We built this Code on the solid foundation of our values and operating principles which are core to how we succeed in transforming the way the world works. This Code helps every person who works for, or on behalf of, Trimble to live the Trimble mission, balance conflicting goals, and maintain integrity, lawfulness and ethics in all we do.

Our values reinforce our belief that business can act as a force for good in society. Trimble will always strive to cultivate a workplace and culture that aligns with the highest standards of business ethics.

Trimble **mission**, **vision** and **values**

The core of Trimble culture and success is its mission, vision, and values. **The Trimble mission and vision is to transform the way the world works by delivering products and services that connect the physical and digital worlds.** By living our values of Belong, Grow and Innovate, we inspire purpose and vision, engage to draw out the best from each other, and strive to achieve meaningful results.

Belong

Be Yourself and Thrive Together

We believe in a culture where you can be different from others. With kindness, understanding and grace we celebrate individuality.

We work and win together. With empathy, compassion, and trust, we embrace our diversity and thrive through inclusivity.

Grow

Be Intentional and Humble

We are deeply committed to making a difference in the world. Our growth mindset and high standards drive us to deliver value for the planet and for all of our stakeholders.

Our humility helps us stay self-aware of what we can do to better ourselves and the communities where we live and operate.

Innovate

Be Curious and Solve Problems

With an entrepreneurial mindset, we focus on our customers' success by continually exploring and looking for ways to innovate, improve and make their life's work better.

We explore new and creative methods to solve complex problems that ultimately help us learn and grow and provide new value to our customers.

About our Code

Trimble develops industry-specific solutions to help customers achieve economic breakthroughs while enhancing productivity, boosting compliance, and improving environmental sustainability. Demonstrating our values through our actions drives our success in achieving our mission and vision.

While no such document can be a comprehensive road map for handling every situation or issue that may arise, this Code provides tools and information to help you make the right decisions while working for or with Trimble. By using this Code, acting lawfully, ethically and fairly, complying with our policies, and avoiding even the appearance of impropriety, Trimble team members can live Trimble values and maintain the highest standard of business ethics.

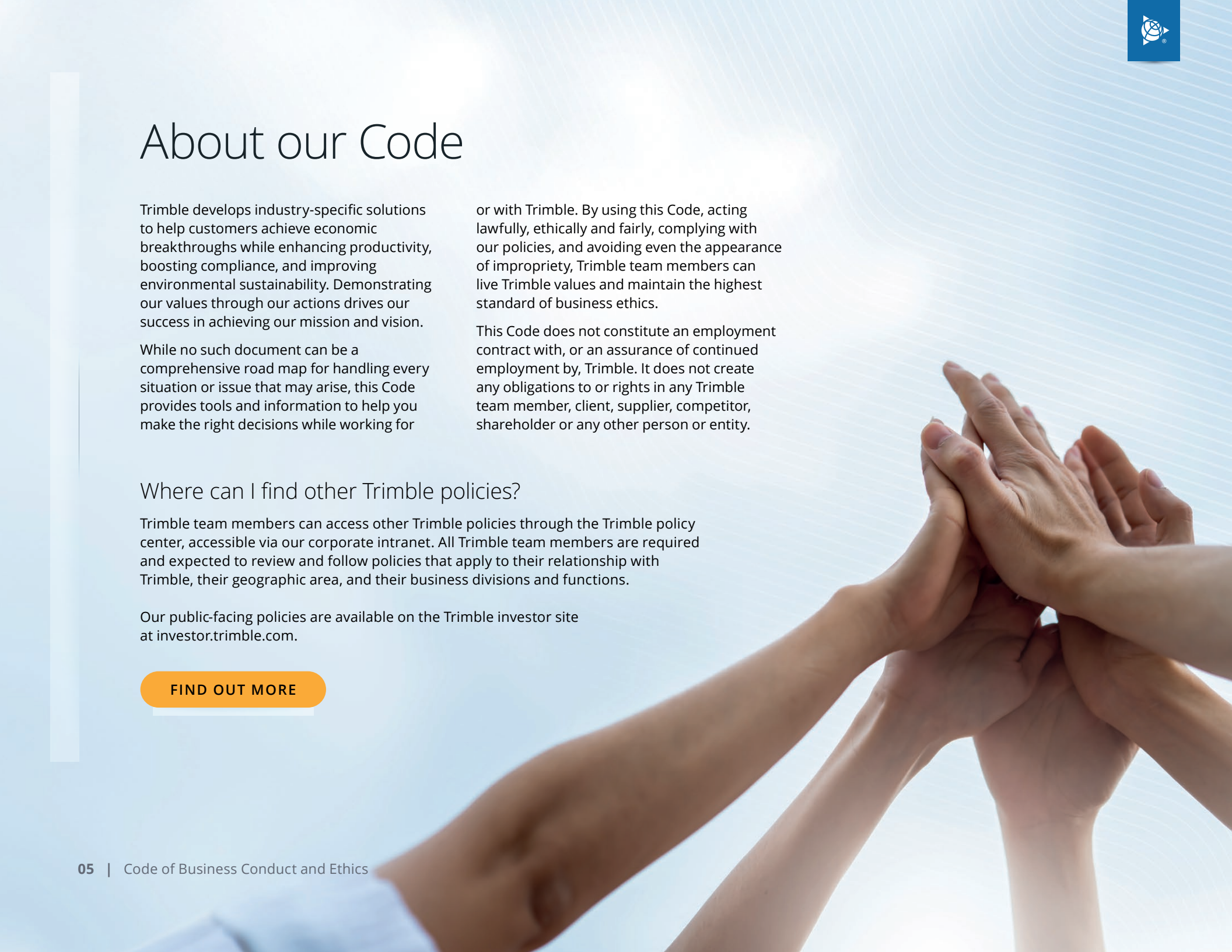
This Code does not constitute an employment contract with, or an assurance of continued employment by, Trimble. It does not create any obligations to or rights in any Trimble team member, client, supplier, competitor, shareholder or any other person or entity.

Where can I find other Trimble policies?

Trimble team members can access other Trimble policies through the Trimble policy center, accessible via our corporate intranet. All Trimble team members are required and expected to review and follow policies that apply to their relationship with Trimble, their geographic area, and their business divisions and functions.

Our public-facing policies are available on the Trimble investor site at investor.trimble.com.

FIND OUT MORE



Code Q&A

Who needs to comply with this Code?

Each of us drives the success of Trimble and is responsible for living its values. That is why this Code applies to all employees, directors, officers, and interns of Trimble Inc. and its affiliates and subsidiaries, collectively referred to as “Trimble team members” in this Code.

Depending on the circumstances, conduct of and interactions between Trimble team members relating to their employment (even if occurring outside Trimble) are subject to this Code.

This Code does not apply to contractors and other non-employee third parties, who are governed by the separate **Third Party Code of Conduct.**

Can the Code be updated?

Trimble policies, including this Code, may be updated or amended occasionally. Employees can find the most recent version of this Code on the Policies portion of the People eXperience site on Charlie. Others can find the most recent version on our Investor page at **investor.trimble.com.**

What happens if our Code is violated?

Violations of this Code can result in erosion of our customers’ trust and damage to our reputation. Any failure to comply with this Code, with applicable Trimble policies, or with applicable laws, rules or regulations may result in disciplinary action up to and including termination of employment, and/or may result in criminal or civil liability.

Can a waiver be requested?

There may be instances and situations where you believe acting in a way that differs from the requirements of this Code aligns with our mission, vision and values. All waivers under this Code must be approved in writing by the Trimble Chief Compliance Officer, or by the Trimble Board of Directors or its delegates with respect to a waiver requested by Trimble executive officers or directors, and will be disclosed promptly to the extent required under federal securities laws and/or applicable stock exchange rules.

Responsibilities under this Code

Trimble team members' responsibility

Every Trimble team member is responsible and accountable for living our values through their actions.

You are always expected to:

- Follow this Code, Trimble policies, and applicable laws
- Behave in alignment with Trimble values
- Use good judgment and avoid inappropriate business conduct
- Act with integrity, honesty, and respect
- Report violations of this Code, Trimble policies, or the law.

Non-employee and other third party responsibilities

Contractors, vendors, suppliers, distributors, dealers, and other non-employee third parties are expected to:

- Comply with all applicable laws, rules and regulations
- Comply with the Trimble Third Party Code of Conduct (except to the extent it conflicts with local law, rule or regulation)
- Comply with the Responsible Business Alliance (formerly EICC) Code of Conduct if applicable
- Conduct themselves in alignment with Trimble values.

People leader responsibilities

Trimble people managers and leaders have additional responsibilities to help ensure the Trimble team is following this Code and living Trimble values.

Managers and leaders must:

- Lead by example by demonstrating ethical behavior, sound business judgment and integrity, and by reporting problems when you see them
- Demonstrate consistency in holding people accountable for their behavior and enforcing our policies
- Be receptive to questions and concerns raised to them, and ensure they are escalated appropriately
- Not use a proxy (e.g., another employee) to do something that they wouldn't do or can't do themselves
- Ensure their teams understand this Code and Trimble values, and that business decisions which compromise our values and principles are never acceptable
- Ensure Trimble team members who report concerns under this code in good faith are treated consistently and fairly, and are not retaliated against.

Good decision-making

It is most important to live Trimble values when faced with a difficult, unclear or challenging decision or situation. If you find yourself in such circumstances, ask yourself:

- Is it legal?
- Is it consistent with the Trimble mission, vision and values, this Code, and our policies?
- Is it in the best interest of Trimble and its shareholders?
- Does it feel like the right and ethical thing to do?
- Do I have all the information I need to move forward?
- Would it reflect well on Trimble if it became public?

If no to any: Proceeding is most likely not in the best interest of Trimble or aligned with Trimble values. Consider alternative approaches.

If you're not sure: Ask for guidance from your manager or another internal Trimble resource.

If yes to all: It's probably OK to proceed, but revisit the decision if any of the facts change.

How to spot a challenging situation

Good decision-making starts with being aware that you're facing a difficult, unclear or challenging decision or situation. No excuse or pressure justifies failing to live Trimble values or follow this Code.

Statements like the ones on the right can indicate that the answer or path forward isn't clear. If you hear or see any of these or similar statements, stop and validate the right way to proceed.

"That's the way we've always done it so it must be the right thing to do."

"We need to do what our competitors do."

"We have to do it to win the business."

"It doesn't matter what our policy says."

"No one will know/care if we do it that way."

"Our customer/partners' interests don't matter here."

"This isn't a question of what's right."

Speak up and seek guidance

If you're not sure what to do or are worried about a potential violation of this Code or Trimble policy, help is available. Trimble is an "open door" company and we encourage our team members to raise concerns and ask questions. We offer resources to Trimble team members to answer questions about this Code, our policies, and our values, and for reporting concerns or potential violations.

- **The Trimble Ethics Hotline** is available 24/7 for reporting violations of this Code or a Trimble policy, financial or accounting misconduct, incidents of fraud, serious violations and misconduct, abuse and harassment, and other types of serious risks. You may file a report anonymously through the Ethics Hotline. A list of frequently asked questions regarding the Ethics Hotline is available through Charlie.

  ETHICSPOINT

  US toll-free number: **+1 844.273.3298**

  (International phone numbers are available through the URL above)

- **Your manager and Trimble leadership** are direct resources if you have questions or concerns regarding what you should do under this Code or a Trimble policy.

- **The People eXperience (PX) team** is dedicated to providing Trimble team member-related services, guidance and assistance. You can report a violation of this Code or a Trimble policy to your PX business partner.

- **The Trimble Legal team** can help you interpret this Code and Trimble policies and answer questions on compliance with laws, rules and regulations.

- **The Trimble Chief Compliance Officer and Chief Legal Officer** is Rasmani Bhattacharya, who can answer questions regarding how to apply this Code.

- **The Corporate Compliance team** can help with questions relating to this Code.

- **The Trimble Sustainability team** can answer questions regarding Trimble sustainability commitment and efforts.

- **Internal Audit** can answer questions relating to accounting, finance, and our company controls.

Questions and reported violations are addressed promptly

Trimble will do its best to respond to questions regarding this Code or a Trimble policy as promptly as possible. If you make a good faith report of a suspected violation of this Code, Trimble policy, or the law, Trimble will conduct a prompt, full, fair, and objective investigation to determine if a violation has occurred. If Trimble substantiates the reported violation, parties found to have a substantiated violation will be subject to disciplinary action up to and including termination of employment. Individuals reporting a violation, witnesses to the alleged violation, or persons accused of violating this Code, Trimble policy, or the law are required to fully cooperate with Trimble investigations. Trimble team members are required to keep investigations, and their results or findings, strictly confidential to the extent permitted by law.

Retaliation is strictly prohibited

Trimble does not permit or tolerate retaliation against anyone who in good faith reports a violation of this Code, Trimble policy, or the law, or participates in an investigation of a reported violation.
We take claims of retaliation very seriously. If you feel you have been the subject of retaliation, immediately report it to your manager, the People eXperience team, or the Legal team. If retaliation is substantiated, those who engaged in retaliatory behavior may be subject to disciplinary action up to and including termination of employment.

Report any suspected security incidents, security events, and data breaches

If you believe or suspect a security incident, security event or a data breach involving Trimble has or may have occurred, contact the number below. Trimble team members can also use the Trimble Incident Report form on Charlie.

Ph. +1 408.481.6202

What does “good faith” mean?

“Good faith” means you sincerely believe that there’s a violation of this Code and the information you provide is honest and accurate to the best of your knowledge. A report of a suspected violation can be made in good faith even if the reported violation can’t be substantiated at the end of the investigation.

Equal employment opportunity; No harassment or discrimination

Trimble believes in providing equal opportunity and an inclusive work environment for Trimble team members. We are committed to fostering a workplace built on equity where our team members feel safe and truly belong, where we actively provide opportunities for them to thrive and develop in their careers.

We recognize that our collective strength comes from the unique differences and individuality of each person on our team. The varied experiences and perspectives Trimble team members bring are fundamental to fueling our innovation and success. We are committed to equitable practices and prohibit unlawful discrimination in hiring, employment, promotion, compensation, and all other employment-related decisions.

Trimble team members are at their best when they feel like they belong and work in a respectful environment.

This is why Trimble is committed to providing a workplace free of harassment, discrimination and abusive conduct, such as sexual harassment, bullying, and harassment based on protected characteristics, whether by employees or non-employees.

Trimble is committed to providing reasonable accommodations to qualified individuals with disabilities or with sincerely held religious beliefs and practices. All Trimble team members must comply with applicable policies on employment practices, as well as applicable laws, rules and regulations.

Where to learn more

Trimble Equal Employment Opportunity Policy

Trimble Harassment-Free Workplace Policy

What are "protected characteristics?"

Characteristics that are protected from discrimination, including:

- Age
- Race
- Ancestry
- National origin
- Citizenship
- Color
- Creed
- Religion
- Disability
- Medical condition
- Marital status
- Gender identity and expression
- Sexual orientation
- Domestic partner status
- Family care or medical leave status
- Military or veteran status
- Genetic information
- Any other basis protected by applicable law.

The Trimble commitment to equitable treatment and non-discrimination is core to fostering our **Belong** value that encourages every Trimble team member to be yourself and thrive together.

Workplace health and safety

All Trimble team members, contractors, and visitors should feel safe while working for Trimble or when on site at Trimble facilities. We all play a critical role in protecting the health and safety of those with whom we interact. Compliance is required at all times with safety, security, and health-related signs, requirements, and policies. Equally important, all Trimble team members must report unsafe behavior, environmental concerns, or other actions that put our team members, visitors, or the public at risk.

We expect our dealers, distributors, vendors, suppliers, and contractors to provide an equally safe and healthy workplace for their own personnel.

Drug-free workplace

All Trimble team members are expected to report to work (whether in the office or remotely) free of any substance that could prevent them from doing their jobs properly or which creates a dangerous situation for themselves or others. Performance must not be impaired by drugs, alcohol, over-the-counter medication, or other substances. Possession, use, or offering to others of illegal drugs in the workplace is strictly prohibited.

Trimble team members may not consume alcohol while at work or at work functions if it will impair their ability to perform their job duties, would endanger others, or would reflect adversely on the reputation of Trimble.

Violence and weapons

Trimble strictly prohibits violence or threats of violence of any kind in the workplace. We do not tolerate physical injury, physical or verbal threats or intimidating behavior, vandalism, or other personal injury or damage to property. Weapons are prohibited in all Trimble properties unless specifically permitted by the Legal team and the People eXperience team.

Where to learn more

Trimble Occupational Injury and Illness Policy
Trimble Use of Drugs and Alcohol Policy
Trimble Violence-Free Workplace Policy
Trimble Weapons in the Workplace Policy

What Trimble team members must do:

- **Ensure** you know the security and emergency procedures for your workplace
- **Don't** allow unauthorized personnel into Trimble properties. Always use your badge when entering
- **Use** personal protective equipment (PPE), and follow safety practices, as required
- **Demonstrate** compliance with workplace health and safety policies and requirements. Be a model to others of safe work practices
- **Watch out** for warning signs of workplace violence
- **If you suffer an injury on the job,** report it right away to your PX business partner, and follow our Occupational Injury and Illness Policy.

If you have concerns about an unsafe work condition or about violence or a weapon in the workplace, report them immediately.

Fair competition and fair dealing

Trimble believes in the importance of a "level playing field" in the markets we serve; in doing business and engaging in business dealings fairly, ethically and lawfully; and in the value of free, open and fair competition based on quality, price and service. Our goal is to be successful through hard work, exceeding customer expectations, and the merits of our products, software and services, not through improper business practices.

Trimble team members must comply with the letter and spirit of applicable competition, antitrust, and price fixing laws wherever we operate, avoiding any activities that are or could be perceived as anti-competitive. Trimble team members in roles that may involve competition issues, or those managing such personnel, must learn and understand our policies relating to competition as well as applicable antitrust and anti-competition laws, rules and regulations. Additionally, because Trimble Inc. is a global company incorporated in the US, both US anti-competition laws and the laws of other countries may apply to our worldwide activities.

Trimble team members must evaluate suppliers and vendors fairly and uniformly by making decisions based on objective criteria, such as competitive pricing, delivery, quality, reliability, and service.

Prohibited activities include:

- Talking with competitors about our pricing, customers, territories, or sales levels/volumes
- Using inaccurate, unclear, false, or unfair marketing, advertising, or sales materials/strategies
- Giving preferential treatment to one customer/vendor/supplier over another similarly situated
- Making false, misleading, or exaggerated statements or claims about Trimble or our competitors' products or business
- Making promises or offers on behalf of Trimble that cannot be kept or met by Trimble.

Dealing with third parties

When dealing with third parties such as competitors and suppliers, Trimble team members must exercise good judgment and reflect our values. Never make agreements about restricting competition with third parties, or even engage in such discussions.

All agreements must be documented in writing. Do not use informal understandings, verbal agreements, or proxies.

Trimble team members must not exchange non-public information with competitors unless specifically approved in writing by the Trimble Legal team.

Obtaining business intelligence

Obtaining competitor, customer and supplier information for business intelligence purposes can be a valuable business tool, but must always be done ethically and lawfully, without misrepresentation or deception, and without use of third party confidential information or other information without authorization (whether sourced directly or received from someone else).

Never disclose to Trimble confidential or proprietary information that you learned during past employment or which was otherwise provided to you under a non-disclosure agreement/ confidentiality agreement between you and someone else.

Good sources of competitive business intelligence include public information on the Internet; securities filings and press releases; news articles, interviews, and speeches; and court filings.

What types of agreements are prohibited?

Any agreement which limits competition, including:

- Agreements between competitors agreeing to fix prices or set price minimums/maximums
- Manipulating a Request for Proposal (RFP) or bidding process
- Agreements between competitors that set boycotts of, or restrictions on, customers or suppliers
- Limits or restrictions on inventory, production, capacity, or sales with the intent of “dividing up the market”
- Dividing territories, markets, geographies, or customers between competitors.

What types of relationships are covered by anti-competition and antitrust laws?

- Current and potential competitors
- Customers
- Vendors and suppliers
- Partners
- Strategic alliances

Conflicts of interest

Trimble team members must always act professionally and in the best interest of Trimble, prevent outside interests from interfering with their job duties, and avoid using their position for personal gain for themselves or others.

Choices made by a Trimble team member reflect on Trimble and its reputation. Conflicts of interest negatively impact our business and erode trust in Trimble. Trimble team members must avoid actions or situations that create, or even appear to create, a conflict of interest, except where a conflict is not in violation of Trimble values and is expressly approved in advance by the Chief Legal Officer or Business Segment leader.

What is a conflict of interest?

A conflict of interest is when a Trimble team member's outside interests, relationships, or activities interfere, or appear to interfere, with their work-related duties or their ability to make impartial and objective decisions for the benefit of Trimble.

Where to learn more

Trimble Relationships in the Workplace Policy

If something would appear to people within or outside of Trimble to be a conflict of interest, it should still be avoided even if no actual conflict exists. While it's impossible to list every possible conflict of interest scenario, some examples are included alongside.
If you are not sure if a situation creates a conflict of interest, contact your manager, PX business partner, or a member of the Legal team for guidance.

If you believe an actual or perceived conflict of interest exists (even if it does not involve you), report it immediately to PX, Legal, the chief compliance officer, or through the Ethics Hotline. By acting proactively, conflicts can often be avoided or resolved.

Questions you can ask yourself to help identify a conflict of interest:

- Does it compete with the interest of Trimble?
- Will it interfere with my ability to do my job impartially and objectively?
- Does it go against Trimble values?
- Will a friend or family member benefit?
- Would someone else think a conflict exists?

If you're unsure, ask for guidance.

Situations that constitute a conflict of interest:

- A personal or family relationship with someone in your reporting structure or for whom you make employment-related decisions
- A side job or second job (1) that competes with, sells to, or buys from Trimble, (2) that interferes with your ability to do your job at Trimble, or (3) for which you use Trimble resources
- Owning more than a 5% investment in, or providing advice or other services to, a company that works or competes with Trimble unless approved by Trimble leadership or the Chief Legal Officer
- Taking for yourself an opportunity that could benefit Trimble where you learned about it through your work for Trimble
- Using Trimble information, resources, or relationships, or your position at Trimble, to benefit yourself or a family member
- Using a third party (e.g., a family member) to do something that would be a conflict of interest if you did it yourself
- Acting as an industry "expert" for others, unless approved by the Chief Legal Officer or business segment leader.

Gifts and hospitality

Trimble team members must avoid directly or indirectly giving or receiving gifts or hospitality that influence or appear to influence a business decision.

Receiving gifts

Trimble team members may not solicit or accept gifts, favors, loans, offers, or other benefits (e.g., goods, services, discounts, a charitable contribution in the name of Trimble or a team member) from any Trimble customer, supplier, or competitor, other than nominal gifts. Exercise good judgment in deciding whether to accept a nominal gift, and consider whether it would create even the appearance of impropriety; if in doubt, politely refuse it and explain our policy. If you receive a gift that is not a nominal gift, you must either return it, dispose of it, or turn it in to the PX or Legal team, and you must inform the providing party that the gift cannot be accepted under the Trimble gift policy.

Giving gifts

Trimble team members may provide business-related meals and events, ordinary business courtesies, and nominal non-cash gifts when it's generally accepted to be industry practice to do so, as long as the gift or hospitality is not solicited and is:

- Reasonable, appropriate, and legitimate under the circumstances;
- Allowed under applicable anti-corruption and anti-bribery laws (i.e., would not constitute a bribe or kickback);
- Not given in return for something or intended to improperly influence the recipient's business decision;
- Permitted under the policy of the company for which the recipient works; and
- Submitted for reimbursement by Trimble in accordance with Trimble standard expense reimbursement process.

Trimble-branded promotional merchandise is generally an acceptable and preferred gift.

What are nominal gifts?

Nominal gifts are business-related gifts, offers or services that:

- Are casual entertainment or non-monetary gifts or offers of relatively small value customarily given to others in a similar relationship with the recipient;
- Are lawful; and
- Are not made to influence a business decision or secure undue advantage with the recipient.

Nominal gifts are permitted under this Code.

Not sure if something is a nominal gift, or if it's OK for you to accept or give it?

Check with your manager or another designated Trimble resource for assistance.

Where to learn more

Trimble Anti-Bribery and Anti-Corruption Policy

Public communications and disclosures

We are committed to providing the public with full, fair, accurate, and timely disclosures in compliance with applicable laws, rules and regulations. Improper disclosures of information, such as non-public forecasts or earnings information, can have significant implications for Trimble. Because of this, very few Trimble team members are authorized to make public statements and announcements on its behalf.

Unless you are an authorized spokesperson for Trimble, Trimble team members must not speak to the media or investors. Law enforcement or government agency inquiries should be directed to our Legal team. Trimble team members also must not make any written, oral or electronic public statements on behalf of Trimble or respond to public inquiries. Additionally, Trimble team members must not make any non-public disclosures or act on information that would violate securities laws, such as providing tips or engaging in insider trading as discussed later in this Code.

Using social media

Ensure you are following Trimble Social Media guidelines and related policies when using social media, blogs, comment threads, and other online communication platforms. Always think before you post. Communicate respectfully and in alignment with Trimble values. If you say that you work for Trimble, make it clear that your view and opinions are your own and do not represent Trimble. Never communicate in a way that implies you are speaking on behalf of Trimble unless you are an authorized Trimble spokesperson, and never share sensitive or proprietary information about Trimble through social media. If you see incorrect information about Trimble online, notify Marketing; don't try to correct it yourself.

"A customer asked me if I could provide a quote for use in a press release and their marketing collateral. We've got a great relationship. Is it OK?"

Not without first getting the approval of the Trimble Marketing team. Marketing may ask to approve both the specific quote or release as well as how you're attributed. Protecting the Trimble brand and reputation is a responsibility shared by all Trimble team members.

"I received a media, shareholder, analyst, or other public inquiry. Where should I direct it?"

- Media inquiries: to our Marketing/Public Relations team at pr@trimble.com
- Shareholder/analyst inquiries: to our Investor Relations team at investor_relations@trimble.com
- Law enforcement and governmental inquiries: to our Legal team at legal@trimble.com
- Other inquiries: to your manager or the Legal team

Where to learn more

Trimble Corporate Disclosure Policy
Trimble Social Media Policy
Corporate Communication @Charlie

Books and records

As a public company, properly maintaining Trimble financial and business records is critical for us to provide correct information to our auditors and shareholders and to make well-informed business decisions. At all times, our books and records must paint an accurate picture of Trimble business, accounts, activities, and performance.

It's important that our books and records are accurate, timely, correct, complete, and understandable, and that they follow Trimble internal controls as well as applicable legal and accounting standards.

All Trimble team members, including those in finance and accounting roles, must do their part to follow Trimble policies and ensure our business performance and associated records are properly documented.

What are books and records?

Information about Trimble business created and maintained to evidence our business transactions, finances, and legal obligations.

What Trimble team members must do:

- **Follow** Trimble policies and guidelines on financial reporting and data classification
- **Ensure** all business transactions are properly documented and recorded
  Do not conduct business by handshake or undocumented (e.g., oral) promises
- **Document** all business expenditures, including travel and business expenses
- **Watch out** for any incorrect or false information, material omissions, or other irregularities in our books and records
- **Don't** acquire or create "off the books" assets or create liabilities
- **Don't** sign agreements and other business documents if you are not authorized by Trimble to sign it under the Trimble Spending Authorization Policy
- **Don't** create, accept, approve, or share business records that falsify or misrepresent the true nature of the transactions, intentionally or otherwise
- **Follow** all litigation hold and document preservation requirements
- **Report** suspected issues immediately to the Legal team, Internal Audit, the Trimble Chief Compliance Officer, or through the Ethics Hotline.

Where to learn more

Trimble Finance Policies
Trimble Travel & Expense Policies

Government relationships and contracts

Trimble observes the laws, rules and regulations that govern the acquisition of goods and services by any governmental entity of any country, and the performance of government contracts. We must always deal fairly and honestly with government agencies. Activities that may be appropriate when dealing with private companies may be improper and even illegal when dealing with government customers. The penalties of failing to adhere to these laws can include substantial civil/criminal fines or imprisonment or Trimble being prohibited from doing government business.

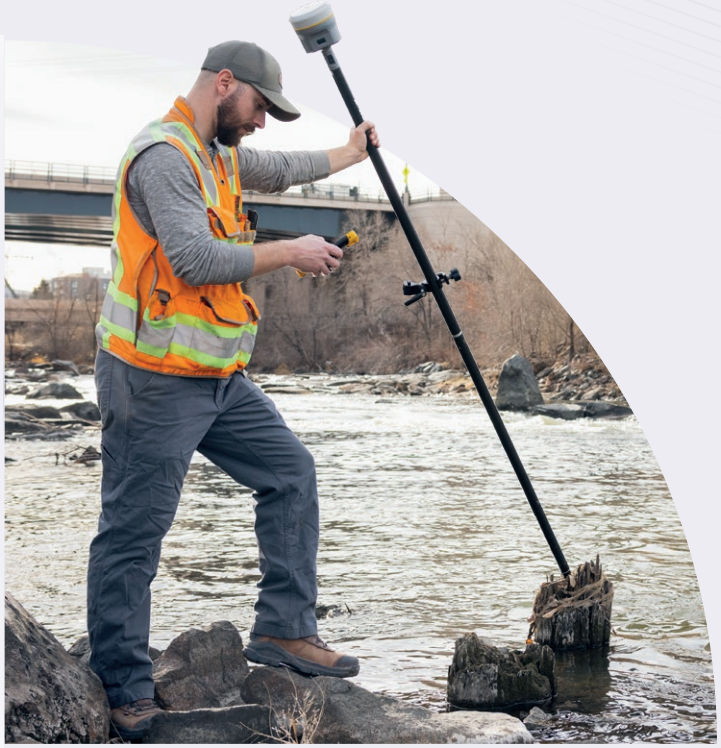
Trimble team members who deal with any governmental agency, including international organizations, are responsible for learning and complying with all applicable company policies and procedures, and any rules that apply to government contracting and interactions with government officials and Trimble team members.

Who is a government official?

Anyone who is a representative of a government, its agencies, or a political party, or is acting on their behalf, including employees of government-owned entities and companies, candidates for public office, and close family of government officials which includes extended family and people who share the official's household.

What Trimble team members must do:

- **Follow** governmental procurement and tender processes, even if they're complicated and even if an official states that it's okay to skip certain steps
- **Watch** out for third parties who deal with governments on our behalf who suggest they can "cut red tape" or "expedite the process," or who you think may be engaging in unethical or illegal practices
- **Don't** provide information to a government agent without first checking that person's credentials, or without first getting permission from the Legal team
- **Don't** offer gifts or hospitality to a government official if prohibited by law, rule or regulation, or Trimble restrictions on giving gifts
- **Avoid** any direct or indirect activity that could be considered as an attempt to inappropriately influence a decision of, or the behavior of, a government official.



Where to learn more

Trimble Anti-Bribery and Anti-Corruption Policy

Trimble Worldwide Travel, Entertainment and Other Reimbursable Costs Policy

Compliance with laws and regulations

Trimble is committed to compliance with all applicable laws, rules and regulations in the countries, states, provinces, and other regions in which we operate. Legal compliance is key to Trimble success and our reputation in the countries and markets it serves. Many sections of this Code, and many of Trimble policies, reference and require legal compliance.

Trimble team members are expected to be familiar with, and to comply with the letter and spirit of, laws, rules and regulations that apply to the work they do for Trimble.

Trimble team members should report any legal demands, threats or claims to the Legal team immediately.

Laws, rules and regulations that affect Trimble include, among others:

- Labor and employment
- Privacy and cybersecurity
- Insider trading and securities
- Trade compliance
- Antitrust, monopoly, and anti-competition
- Consumer protection
- E-commerce
- Intellectual property
- Financial reporting.

"I think there's a conflict between a Trimble policy that applies to me, and an applicable law, rule or regulation. Who should I reach out to for help?"

If you need help resolving a conflict between a Trimble policy and applicable laws, rules, or regulations, Trimble team members should contact the Trimble Legal team for assistance. Vendors, suppliers and other third parties should contact their own legal representative for help.

"I'm concerned that something we're doing or thinking of doing isn't legal. What should I do?"

Trimble team members must always act lawfully and in alignment with Trimble values. Trimble team members should contact the Trimble Legal team for assistance. Vendors, suppliers and other third parties should contact their own legal representative for help.

If you have concerns with the legality of something we're doing or thinking of doing, please reach out to the Legal team for assistance.

Preventing corruption and improper payments

Trimble believes in success through doing business in a legal and ethical manner that aligns with our values. Trimble team members are prohibited from engaging in corrupt or fraudulent business practices, and from making, offering, or receiving improper payments such as kickbacks, bribes, or unauthorized facilitation or "grease" payments. The US and other countries have anti-corruption and anti-bribery laws which Trimble team members must strictly follow both in letter and spirit.

Trimble expressly prohibits giving or offering, either directly or through an agent or intermediary (e.g., dealers or consultants), anything of value in order to obtain, retain, or maintain business or secure an improper advantage or influence, to (i) an officer or employee of any government, government department or agency, or state-owned or state-controlled enterprise; (ii) a political party or party official; (iii) a candidate for political office; or (iv) an officer or employee of a public international organization. Payments can be made to government officials and foreign agents when they are for services rendered, are reasonably related to the product or service received, and are both lawful and ethical.

Facilitation payments (even if legal under a country's laws) are prohibited by Trimble, except where a Trimble employee may face a threat of physical harm or loss of liberties (e.g., loss of passport, detention) unless a payment is made, leaving little choice. If this happens, contact the Legal team beforehand if possible, or as soon as possible afterwards.

Definitions to know

- **Corruption:** Abusing one's power or position to personally benefit oneself or others
- **Kickback:** Giving, offering, or receiving a monetary or non-monetary payment to another person after receiving a favorable outcome such as the award of a contract or avoiding required processes
- **Bribe:** Giving, offering, or receiving a monetary or non-monetary payment to another person to facilitate the later receipt of a favorable outcome such as the award of a contract or avoiding required processes
- **Facilitation ('grease') payment:** A small amount paid to facilitate routine and non-discretionary government functions such as issuance of permits, licenses, visas, or other official documents.

Where to learn more

Trimble Anti-Bribery and Anti-Corruption Policy

Trimble Worldwide Travel, Entertainment and Other Reimbursable Costs Policy

Corporate compliance

Doing business globally is essential to the Trimble mission to transform the way the world works. Trimble is subject to a variety of international laws regarding trade which can impact our ability to conduct business with certain individuals and companies, and in certain regions or countries. Trimble is committed to complying with all applicable boycotts, trade sanctions, customs requirements, and export and import laws, rules and regulations. This includes US export laws, including the Export Administration Act, the Arms Export Control Act, the Foreign Assets Control Regulations, and International Traffic in Arms Regulations, as well as the export control laws of other countries where Trimble does business, regardless of the location of a particular business or the place of origin of products.

Trimble team members are prohibited from physically, verbally, or electronically communicating, shipping, transmitting, or in any other way exporting or re-exporting hardware, software, documentation, technical data, or other technology from the United States or any other country without confirming that such export may lawfully be made to the intended recipient in the intended country or destination. Distribution of information, including licensing information, export data, and other documentation to affiliates and subsidiaries internationally must be done in compliance with trade compliance laws, rules and regulations.

Trimble must avoid doing business with a distributor, supplier, or other third party that tries to evade trade compliance requirements, or to source/send products from/to embargoed or sanctioned countries.

What Trimble team members must do:

- Trimble team members doing business internationally, such as those in logistics, supply chain and product fulfillment, must be familiar with and comply with all applicable laws and Trimble policies relating to trade compliance
- Requests from customers, suppliers, third parties, or government representatives relating to a boycott should be reported to Corporate Compliance or Legal immediately
- If a customer asks for an export or customs number for a Trimble product, Trimble team members can use the Import/Export Product Data tool on Export's Charlie page and on the Trimble website; otherwise, for export restrictions and licensing, contact the Corporate Compliance Team for assistance.

⚠ **Caution:** Sharing Trimble technology or product information with a foreign national sitting across from you is considered an export to the foreign national's country, and may be regulated.

Where to learn more

Trimble Anti-Boycott Policy

Trimble Export Policy

TRIMBLE IMPORT/EXPORT PRODUCT DATA TOOL

Sourcing and supply chain compliance

Trimble relies on strong and deep relationships with its dealers, distributors, suppliers, vendors, and other supply chain partners. Our goal is to source responsibly, and we look for supply chain partners that share our values and conduct themselves ethically and lawfully.

Supply chain partners are expected to comply with all applicable laws, rules and regulations, including those related to employment and wages, environmental and anti-corruption, eradication of slavery and human trafficking and IP protection and antitrust laws, wherever they are engaged in business.

Trimble supply chain partners are also required to comply with the Trimble Third Party Code of Conduct, which specifies Trimble guidelines for how it expects its supply chain partners to act lawfully and ethically and to report concerns or potential violations, as well as the Responsible Business Alliance Code of Conduct.

Violation of these requirements by a Trimble supply chain partner may lead Trimble to seek a replacement partner with which to do business.

Trimble team members who transact business with Trimble supply chain partners are required to communicate Trimble requirement to comply with all applicable laws, rules and regulations and applicable codes of conduct, and ensure that all supply chain contracts contain relevant provisions consistent with the above requirements. These Trimble team members may be subject to periodic audit to ensure interactions with Trimble supply chain partners are objective and in the best interest of Trimble.

What Trimble team members must do:

- **Ensure** procurement and supply chain decisions are made on objective factors and are in the best interests of Trimble
- **Avoid** "sole sourcing" where there is no acceptable alternative supplier
- **Ensure** all supply chain partner contracts are in writing, meet Trimble contracting standards, and contain an obligation by the supply chain partner to comply with Trimble supply chain requirements
- **Immediately alert** the Legal team of any suspected violation of laws, ethics, or policy by a supply chain partner, or report it through the Ethics Hotline.

Where to learn more

Trimble Small Business Subcontracting Policy

Trimble Human Rights and Labor Policy

TRIMBLE THIRD PARTY CODE OF CONDUCT

RESPONSIBLE BUSINESS ALLIANCE CODE OF CONDUCT

Insider trading

No person should ever trade in Trimble stock (or any other company's securities) based on positive or negative information that's not publicly known and would influence someone's decision to purchase, sell or hold that security or cause the price of that security to change once that information becomes public—that's insider trading. Insider trading is a violation of this Code and Trimble values, is illegal, and is prohibited through Trimble Insider Trading Policy which applies to all Trimble team members.

Trimble team members must keep material nonpublic information strictly confidential. They are prohibited from trading in Trimble stock or the securities of other companies based on material nonpublic information, or from attempting to improperly manipulate the price of Trimble or other companies' securities.

Providing inside information or trading recommendations (e.g., buy, don't buy) about a company to anyone who may trade in that company's securities, including to family members, friends, relatives, and business associates, is called "tipping" and is also prohibited insider trading.

Never buy or sell Trimble stock or other securities until any material inside information you possess has become public and investors have had a chance to absorb the information. Certain Trimble team members are also subject to trading blackout periods around certain corporate events such as quarterly announcements of financial results.

What is "material nonpublic information"?

It's information about Trimble or another company that a reasonable investor would consider important information when deciding whether to trade in that company's securities, and that has not yet been disclosed to the public. Examples include financial results or changes to previously announced results, a significant merger, acquisition or divestiture, new equity or debt offerings, changes in senior management, new material legal proceedings or investigations, a significant cybersecurity incident, or new products, partnerships or business transactions of a significant nature.

When should information be considered to be "public" for insider trading purposes?

Once it's been appropriately disclosed to the public, such as in a public securities filing, in an investor call, or through a news release. Information shared under a non-disclosure agreement (NDA) is not considered public.

Where to learn more

Trimble Insider Trading Policy

Political contributions and activities

Trimble respects the rights of Trimble team members to participate in the political process and to make personal contributions to causes they support. They may be politically active on their own time and using their own resources. Trimble team members engaging in political activities must ensure it is clear they are doing so on their own behalf and are not speaking or acting for Trimble. They may not pressure other Trimble team members to support, oppose, or contribute to any candidate, political campaign, party, or official.

Trimble team members may not use company assets, resources or funds for personal purposes to make political contributions to any candidates running for a political office, to support or oppose political campaigns or candidates, or to solicit donations or post or distribute materials. Prohibited contributions include monetary and non-monetary gifts, loans, and assets or use of assets.

Confidentiality and privacy

The reputation of Trimble in the markets it serves, both as a top-tier employer and an industry leader, is tied to its responsibility to protect data entrusted to Trimble by those who work for us, partner with us, or acquire products and services from us. Unauthorized release or disclosure of confidential information would result in reputational harm, loss of customers, and damage to Trimble.

Trimble team members must protect confidential information with the highest level of care and prevent the potential for disclosure of confidential information by taking steps to safeguard the information, strictly controlling the sharing and dissemination of confidential information, and immediately reporting any improper disclosures to Information Security and Legal. For example, Trimble team members must be careful when using public generative AI tools to avoid inadvertent disclosure of Trimble confidential information. Trimble confidential information may only be shared with other Trimble team members who have a legitimate need to know as part of their job and who are entitled to access, receive and use it under Trimble policies, and with third parties who have a need to know to provide services to Trimble and are bound by confidentiality obligations.

Trimble also believes in fair information privacy principles and is committed to implementing appropriate and reasonable practices regarding the collection, handling, and sharing of personal information and sensitive personal info.

Nothing in this Code restricts or prohibits disclosure of confidential information in accordance with whistleblower protections under applicable law, rule or regulation.

What is “confidential information”?

Information about Trimble or its team members, customers, partners or others, and information of others shared with Trimble, which has not been made public or is disclosed to Trimble under NDA.

What Trimble team members must do:

- **Follow** Trimble policies and contractual commitments
- **Protect** Trimble confidential information through proper storage, use, encryption, and disposal/destruction
- **Only** access or use confidential information if you need to know it for your job and you're allowed to do so
- **Never share** a former employer's confidential information with other Trimble team members or store it within Trimble
- **Don't** discuss confidential information where others can overhear, access confidential information over public networks, or leave confidential information unattended
- **Ensure** confidential information is properly labeled so that it's handled and protected appropriately
- **Don't share** confidential information outside of Trimble unless it's under an NDA or other confidentiality terms
- **Never store** sensitive information on laptops or portable media, or outside Trimble-authorized secure systems.

Where to learn more

Trimble Data Classification Policy

TRIMBLE PRIVACY CENTER

Use of Trimble assets and resources

Trimble physical and electronic tools, information and information systems, work locations, corporate opportunities, and other assets and resources are critical to our success. Trimble team members are expected to protect Trimble assets and resources and ensure their efficient use for Trimble benefit. Theft, carelessness and waste have a direct negative impact on Trimble. Our assets and information systems, such as funds, facilities, supplies, equipment, networks, products, and business records, as well as Trimble team members' work time, are to be used lawfully and ethically for legitimate Trimble business purposes in alignment with Trimble values. Inefficient or illegal use of Trimble property and systems hurts all of us, and may result in disciplinary action, including termination.

Proper use of Trimble assets and resources goes hand in hand with security. Trimble team members must safeguard all assets and resources entrusted to them, and follow all physical security and information security rules and policies.

Can I use my Trimble computer/phone for personal use?

Incidental and occasional personal use of Trimble assets and information systems is permitted for lawful purposes under Trimble Acceptable Use Policy, as long as it doesn't violate any Trimble policies, interfere with your ability to do your job, damage or interfere with Trimble systems or operations, use more than a small amount of company resources, or put Trimble, its information, or its systems at risk.

What Trimble team members must do:

- **Follow** all Trimble information technology and security rules, policies, and controls
- **Use** common sense and good judgment with respect to access and use of Trimble assets and resources
- **Only use** equipment approved by Trimble IT to perform your job, and keep it physically and electronically secure
- **Let IT know immediately** if any Trimble assets are damaged, and return them to IT for repair or disposal
- **Never store** confidential information on portable drives/media
- **Keep** company information on secure Trimble servers, not locally
- **Use** strong passwords and lock your workstation
- **Don't** disable or circumvent Trimble asset security controls
- **Immediately report** any concerns regarding misuse of Trimble assets or resources.

Where to learn more

Trimble Acceptable Use Policy

Protecting intellectual property

Trimble intellectual property is among the most valuable assets owned by Trimble. Our intellectual property differentiates Trimble and its products and services, and helps us compete. Equally important, all Trimble team members play an important role in ensuring that inventions and other intellectual property they create are properly protected to ensure Trimble can fully leverage its value.

All Trimble team members are responsible for doing their part to protect and defend Trimble rights in and to its intellectual property. Trimble intellectual property should be carefully protected from misappropriation and misuse. We all must ensure Trimble intellectual property is used only as permitted by Trimble policies or as specifically approved by authorized Trimble such as Legal or Marketing. At the same time, Trimble team members must respect the rights of others in others' intellectual property, and avoid knowingly misusing or violating the intellectual property rights of others.

Where to learn more

Trimble Open Source Policy

What is "intellectual property?"

Intangible (non-physical) Trimble assets such as our patents, copyrights, and trademarks; Trimble logos and brands; our source code; blueprints and schematics; designs and "look and feel"; our know-how and trade secrets; inventions and improvements; and our reputation and goodwill.

What Trimble team members must do:

- **Don't** use information, material, ideas, or code belonging to someone else without authorization, including online images, open source, and unsolicited ideas from third parties
- **Any** new inventions created by Trimble team members must be promptly disclosed to the Legal team's Intellectual Property group
- **Report** any claims of infringement to the Legal team immediately
- **Protect** the Trimble name, logo, and brands by following our brand guidelines, and ensure the Marketing team approves any use by third parties
- **Respect** the intellectual property of others; don't use others' IP without permission and authorization, and don't assume that it's OK to use just because it's on the Internet.

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