



## Anti-Bribery and Anti-Corruption Policy

Effective Date: June 19, 2024

**Trimble Inc.**  
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### **PURPOSE**

Trimble believes in success through doing business in a legal and ethical manner that aligns with our values. Throughout our operations, the Company seeks to avoid even the appearance of impropriety in the actions of those working for Trimble or representing Trimble. The laws of virtually all countries in which we do business prohibit corrupt payments for business purposes. In addition, because Trimble is a publicly-traded US company registered with the US Securities and Exchange Commission ("**SEC**"), its global operations must comply with the US Foreign Corrupt Practices Act ("**FCPA**").

This Anti-Bribery and Anti-Corruption Policy (the "**Policy**") reiterates our commitment to integrity and explains the specific prohibitions and requirements applicable to our business under anti-bribery and anti-corruption laws, including but not limited to the FCPA and the UK Bribery Act of 2010, and provides additional information and guidance in support of compliance with these laws and with the Trimble Code of Business Conduct and Ethics (the "**Code**").

Violations of the FCPA can also result in violations of other US laws, including anti-money laundering, mail and wire fraud, and conspiracy laws. The penalties for violating the FCPA are severe. In addition to being subject to the Company's disciplinary policies (including termination), individuals who violate the FCPA may also be subject to imprisonment and fines.

### **SCOPE**

This Policy is applicable to all of Trimble's operations worldwide. All directors, officers, employees, agents, consultants and representatives of Trimble throughout the world ("Trimble persons") are expected to be aware of and abide by the requirements of anti-bribery and anti-corruption laws and Trimble policies against corruption and unethical business behavior.

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**PUBLIC**

Public Release Authorized

While the FCPA and the laws of many countries specifically prohibit corrupt payments to public officials, this Policy and applicable anti-bribery and anti-corruption laws such as the UK Bribery Act also prohibit corrupt payments for any purpose, including corrupt payments involving only private parties.

## TERMS AND DEFINITIONS

<b>Corruption</b>	Acting with the understanding that something of value is to be offered, given, or received to reward or influence a person in connection with that person's official duties.
<b>Anything of Value</b>	Anything, whether monetary or non-monetary, that has value to the giving party, receiving party, or a third party. This term should be interpreted very broadly. It includes but is not limited to money or cash equivalents such as gift cards; stock or other equities; gifts; loans or non arms-length transactions; discounts on products and services not readily available to the public; personal favors (e.g., jobs for relatives of government officials); charitable or political donations or contributions; assumption or forgiveness of debt; improper payment of travel, meals, lodging, or entertainment expenses; any other form or economic benefit; or business, employment, or investment opportunities.
<b>Kickback</b>	Giving, offering, or receiving anything of value to/from another person after receiving a favorable outcome such as the award of a contract or avoiding required processes.
<b>Bribe</b>	Giving, offering, or receiving anything of value to/from another person with the understanding or intent that it is being used to improperly influence the person in connection with their official duties (such as to facilitate the later receipt of a favorable outcome, the award of a contract, or avoiding required processes).
<b>Facilitation ("Grease") Payment</b>	A small amount paid to facilitate routine and non-discretionary government functions such as issuance of permits, licenses, visas, or other official documents.
<b>Government Official</b>	Any officer or employee of a foreign government or foreign political party, of a business or company owned in whole or in part by or controlled by a foreign government (also known as a state owned or controlled enterprise), of a public international organization or any department, agency, or instrumentality thereof; a candidate for foreign political office; or any other person acting in an official capacity. A government official can also be a person acting in an official capacity on behalf of a government entity (e.g., a consultant), individuals holding legislative, administrative, military, or judicial office, or royal family members. Remember, in many countries certain businesses may be wholly or partially state-owned (e.g., healthcare, telecommunications). Individuals working for or holding a

position in wholly or partially stated-owned businesses can also be government officials. Anti-bribery laws apply to payments to any government official, regardless of rank or position, and regardless of whether they are an official at the national, regional, municipal, provincial, state, or local level.

Because the UK Bribery Act, and the laws of other countries, can apply to private parties and government officials, where the following discussion refers to public or government officials, this Policy also applies to conduct involving private parties.

## **POLICY**

### **Prohibited Payments**

This policy, the FCPA, the UK Bribery Act and international conventions, and the laws of most countries prohibit Trimble and individuals acting on behalf of, or for the benefit of, Trimble from making, offering, or promising, authorizing, giving, or attempting to make, offer or give, anything of value (such as kickbacks, bribes, or unauthorized facilitation or “grease” payments) to a government official, or to a third party at the request, direction or suggestion of a government official (e.g., a donation to a charity requested by a government official with decision-making authority on a Trimble business transaction, or where the leader of the charity is a government official or the family member of a government official), in order to obtain, retain, or maintain business, to secure an improper advantage or influence, or to direct business to Trimble or any other person or entity. It’s not just a violation of this policy, but also illegal. It does not matter whether the thing of value is provided, if the improper advantage or benefit is actually secured, or if the intended business is retained. The US and other countries have anti-bribery and anti-corruption laws which Trimble personnel and agents must strictly follow both in letter and spirit. Under no circumstance shall any Trimble person make, offer, promise, authorize, or give anything of value in violation of local law in any country, or attempt to do so.

### **Penalties**

Violations of anti-bribery and anti-corruption laws result in criminal penalties, civil actions, other governmental actions, or private cause of action. For example, individuals (including non-U.S. citizens) found in violation of the US FCPA’s anti-bribery provisions are subject to fines and imprisonment (up to 5 years for each violation of the FCPA).

Additionally, failure to comply with this Policy or applicable anti-bribery laws or regulations may result in disciplinary action up to and including termination of employment or engagement.

### **Permitted Payments**

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. Checks shall not be written to “cash”, “bearer,” or anyone other than the party entitled to payment.

Trimble may pay for the reasonable cost of a non-US government official’s meals, lodging, or travel if, and only if, the expenses are bona fide, reasonable, and directly related to the promotion, demonstration, or explanation of Trimble’s products or services, or the execution of a contract with a non-US government or agency, and the government official can accept them under their applicable government laws. Reasonable (not lavish or excessive) travel and lodging/meal expenses for government officials may be reimbursed for attendance at company product demonstrations, contract performance activities, and other legitimate business purposes. Receipts must be provided for any reimbursed expenses, and no cash per diems are permitted. Offers to reimburse expenses for a government official require prior approval from a Country Manager or sector Vice President, or a person formally designated by a sector Vice President. In addition, accurate records must be kept of any such payment, indicating the purpose of the payment or expense and the fact that a government official was involved.

Even though facilitation payments may be legal under some country’s laws, facilitation payments 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 (a “Safety Payment”). If this happens, contact the Legal team beforehand if possible, or as soon as possible afterwards.

In addition, as further described below, accurate records must be kept of any permitted payments, indicating the purpose of the payment and the fact that it was made to a government official.

### **Payments through Intermediaries**

Anti-bribery and anti-corruption laws also prohibit corrupt payments through an intermediary, such as a consultant, agent, dealer, reseller, distributor, channel partner or joint venture partner. It is unlawful to offer or provide anything of value to a third party while knowing that all or a portion of that thing of value will go directly or indirectly to a government official. Because the law considers “knowing” to include a conscious disregard or deliberate ignorance of a corrupt payment, Trimble encourages individuals to speak up when there is even a suspicion of a corrupt payment.

**Example:** excessive discounts or rebates to dealers can be used to create additional margin for bribe payments. So providing an excessive discount on a product sold to a dealer, knowing that the dealer will use part of the discount margin to make a corrupt payment to a government official, is prohibited. Trimble would still be liable for this improper payment, even though there was no direct payment from Trimble to the dealer or from Trimble to the government official.

### **Contributions and Sponsorships**

Trimble and any Trimble person acting on its behalf may not offer or give, directly or indirectly, funds or anything of value on behalf of Trimble to a political party, party official, candidate for political office, or to any charity or non-profit in an attempt to improperly influence or reward any governmental act or decision, or to obtain any improper advantage for Trimble. More

generally, Trimble's Code of Conduct prohibits Trimble personnel from using 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. Even if an offer or gift to a political party, party official, or candidate for political office is not given in an attempt to improperly influence or reward a governmental act or decision, it still must be permissible under Trimble's Code of Business Conduct and Ethics.

### **Due Diligence on Third Parties**

Trimble and any Trimble person acting on its behalf must at all times conduct and exercise due diligence on proposed business relationships, and seek to ensure that business relationships are formed only with reputable and qualified third parties. Trimble may be held responsible for a violation of anti-bribery and anti-corruption laws by a third party acting on its behalf. In negotiating and documenting any business relationship, potential partners, dealers, consultants, suppliers, agents or representatives shall be informed that they are prohibited from making corrupt payments or violating anti-bribery or anti-corruption laws.

An initial risk analysis must be conducted on all of Trimble's covered third parties prior to onboarding. Thereafter, ongoing risk monitoring and periodic due diligence will continue for the duration of each partner relationship. For questions on the initial risk analysis, ongoing monitoring and periodic due diligence, employees should contact the Compliance team at [compliance\\_administration@trimble.com](mailto:compliance_administration@trimble.com). Agreements with such parties should be submitted to the Trimble Legal or Strategic Sourcing team for any needed review and approval before execution.

### **Additional Restrictions and Policies for Business Dealings with the United States and Other Governments**

In conducting business with agencies and branches of the United States and other countries' governments, employees should be aware that there are specific laws and regulations which may govern such business conduct, in addition to this Policy and the Code. Employees and other parties acting on Trimble's behalf must comply with the letter and spirit of all such laws and regulations. Violation of these laws or regulations may cause the company to be disqualified from future bidding on government contracts, or lead to federal or state criminal liabilities or civil penalties.

Procurement laws have several important goals:

- To obtain the best possible products and services at the best possible price.
- To encourage competition among suppliers based on published specifications and evaluation criteria.
- To reduce or eliminate waste, abuse and fraud.
- To eliminate unfair competitive advantages. Employees engaged in business with the US government are expected to conduct themselves consistently with these goals.

Employees should strictly avoid giving even an appearance of the existence of a conflict of interest or unfair advantage when dealing with the government. Employees may not encourage

a government employee to engage in any activity which the individual is prohibited from doing or which may result in the appearance of improper conduct. Employees should maintain an air of openness in dealings with government personnel, including meeting during regular business hours or meeting in regular business locations.

### **Gifts and Business Favors to Government Personnel**

In addition to the policies and laws discussed elsewhere in this document, some government agencies and departments have specific requirements which govern acceptance of gifts or business favors. Employees of the company must be familiar with these requirements and never offer any gift or business favor which is in violation of applicable law or policy. Employees should be thoroughly familiar with the codes of conduct for the government agencies with which they conduct business.

Where a company-offered favor or gift falls within the exception to a government's policy, employees are still expected to comply with the company's policy of not creating any appearance of impropriety or other requirements as stated in this policy. All such gifts or business favors must be properly accounted for, and complete and accurate records must be maintained. A permitted gift must be nominal in value, and should generally bear Trimble's branding or the branding of a Trimble product.

For more information on restrictions applicable to Trimble personnel on giving and receiving gifts and hospitality, please see Trimble's Code of Business Conduct and Ethics.

### **Books, Records and Accounting Controls**

Trimble has implemented and maintains internal accounting controls to ensure Trimble's books and records are accurate, timely, correct and complete. All transactions involving Trimble funds or assets must be properly documented and recorded accurately and in reasonable detail completely and fairly reflect transactions. The FCPA also requires US companies such as Trimble to maintain a system of internal accounting controls.

**Example:** If a travel expense for a government official is permitted by applicable law (such as payment of travel expenses for a legitimate purpose such as product demonstration), failure to identify the expense as (1) a travel expense (2) involving a government official would violate Trimble record keeping requirements.

All transactions involving the provision of anything of value to a non-US government official must occur only in accordance with this Policy (and with appropriate Trimble authorization where required), and must be recorded in accordance with Trimble's accounting policies.

### **Zero Tolerance**

Trimble will not tolerate any conduct that achieves or attempts to achieve results for Trimble in violation of law or by acting dishonestly. Conversely, Trimble will fully support any Trimble person who declines an opportunity or advantage, where the opportunity or advantage would place Trimble's business ethics and reputation at risk.

## DUTY TO COOPERATE

Trimble may at times undertake a more detailed review of certain transactions. As part of these reviews, Trimble requires all employees, agents, and third-party representatives to cooperate with Trimble, internal and outside legal counsel, outside auditors, or other similar parties.

## IF YOU HAVE QUESTIONS

Trimble's Compliance team and Trimble's Legal team (including our General Counsel who is the Compliance Officer of Trimble on matters involving this policy) manage questions on this policy. You are encouraged to promptly raise any questions regarding activities under consideration with regard to anti-bribery and anti-corruption laws or this Policy to the Compliance team at [compliance\\_administration@trimble.com](mailto:compliance_administration@trimble.com), or to the Legal team at [legal@trimble.com](mailto:legal@trimble.com). You can also reference the Preventing Corruption and Improper Payments slide of the Trimble Code of Business Conduct and Ethics, which references this Policy.

## REPORTING ACTUAL OR POTENTIAL VIOLATIONS

If you are aware of an actual or potential violation of this Policy, you must speak up and let Trimble know immediately. You can report actual or potential violations of this Policy through the Trimble Ethics Hotline, available 24/7 online at <https://trimble.alertline.com> or by phone at (844) 273-3298; you can file claims anonymously through the Ethics Hotline. You can also report actual or potential violations of this Policy by email to Trimble's Compliance team at [compliance\\_administration@trimble.com](mailto:compliance_administration@trimble.com) or to Trimble's Legal team at [legal@trimble.com](mailto:legal@trimble.com).

## COMPLIANCE

Every Trimble person shall comply with this policy. Trimble may require Trimble persons to undergo such anti-bribery and anti-corruption compliance training or to obtain such anti-bribery and anti-corruption compliance certifications as Trimble may deem necessary from time to time. Failure to comply with this policy or to complete required training may result in disciplinary action up to and including termination of employment. Third party representatives who violate this policy may be subject to termination of all commercial relationships with Trimble.