

About Trimble's [Ethics Hotline](#)

What is the Ethics Hotline?

The Ethics Hotline is a comprehensive and confidential third party reporting tool that provides employees and contractors an avenue to report violations of Trimble's Code of Business Conduct and Ethics, incidents of fraud, serious violations and misconduct, abuse and harassment, and other types of serious risks.

Why do we need a system like the Ethics Hotline?

Trimble Inc. ("Trimble") is an "open door" company. Employees are encouraged to report concerns to their supervisor, PX department, manager, Corporate Compliance or the Chief Compliance Officer. The Ethics Hotline is not meant to discourage employees from reporting concerns internally. It was implemented to provide employees another method of reporting their concerns, when they are not comfortable reporting to their direct supervisor or another member of management, or when they wish to remain anonymous.

Reporting – General

Am I able to make a report using either the Internet or the telephone?

Yes. With the Ethics Hotline, you have the ability to file a report via the telephone or the Internet.

What type of situations should I report?

The Ethics Hotline system is designed for employees to report in good faith any perceived serious risk or serious violation of laws and our stated Code of Business Conduct and Ethics. The Ethics Hotline is not for reporting general employee complaints and grievances. Employees are advised to seek the guidance of management or the PX department for those types of situations.

The Ethics Hotline will guide you through the reporting process and give you areas of misconduct that may be reported through the Ethics Hotline.

When I use the Ethics Hotline to report a concern, either on the web or over the telephone, can I choose to remain anonymous?

Yes, however we may be able to conduct a more timely and thorough investigation of your concern if we are able to contact you and follow up with you directly. If you want to report anonymously in the web tool, make sure to make the right selection in the reporting tool!

If I become aware of a potential violation, shouldn't I report it to my supervisor, PX department, manager, Corporate Compliance or the Chief Compliance Officer, and let them handle it?

When you observe some behavior that you believe violates our Code of Business Conduct and Ethics, laws or regulations or other Trimble policies, we expect you to report it. You should bring any concerns forward to your supervisor, PX department, manager, Corporate Compliance or the Chief Compliance Officer. We recognize, however, that there may be circumstances when you are not comfortable reporting the issue in this manner. It is for such circumstances that we have the Ethics Hotline system. We would rather you report your concern instead of keeping the information to yourself.

Where do these reports go? Who can access them?

Reports are entered directly on the Ethics Hotline secure server to prevent any possible breach in security. The Ethics Hotline makes these reports available only to specific individuals (the Compliance Officer and Corporate Compliance Staff) within the company who are charged with evaluating the report, based on the type of violation and location of the incident. Each of these report recipients has had training in proper handling of these reports..

What happens if someone knowingly makes a false allegation or report of misconduct or other concern?

Trimble takes all reports of concern received seriously. If after the conclusion of our investigation it was found that an employee intentionally made a false allegation or report of misconduct or other concern, that employee may be subject to disciplinary action.

Can I be retaliated against (or fired) (or get in trouble) if I report suspected misconduct or a potential violation?

No. Trimble will not discipline, discharge, or otherwise retaliate against an employee or contractor who informs the company of violations in good faith or who participates in good faith in an investigation.

Specific information for Employees based in the European Economic Area (EEA)

Trimble's Ethics Hotline is a secure reporting and investigation system in line with EEA laws and directives. When using the Ethics Hotline reporting interface, you will see information specific to our employees in Europe. That is because EEA privacy laws limit the use of reporting tools that allow for anonymous reporting to breaches of EEA laws and regulations, as well as more serious infractions of other standards. If you see misconduct that you think is not serious enough for reporting through the Ethics Hotline, consider reporting it to local management or People Xperience/HR management.

If you want to report anonymously, please do so. If, however, you decide to disclose who you are, note that laws in the EEA may allow the accused person to request access to the personal information that is being processed, including the identity of the person who has made the accusation.

As for Trimble's practices in processing employee information please consult the Notice of Employee Data Processing of the Trimble company for which you work.

Reporting Security & Confidentiality

It is my understanding that any report I send from a company computer generates a server log that shows every website that my PC connects with, and won't this log identify me as a report originator?

The Ethics Hotline does not generate or maintain any internal connection logs with IP addresses, so no information linking your PC to the Ethics Hotline is available. In fact, our Vendor Navex is contractually committed not to pursue a reporter's identity.

If you feel uncomfortable making a report on your work PC, you have the option of using a PC outside our work environment (such as one located at an Internet café, at a friend's house, etc.) through the Ethics Hotline secure website. Many people choose this option.

Can I still access the case after I have submitted my report, if I report anonymously?

Yes, but it is imperative that you make a note and save your username and the password you select, so that you can log back into the system and access your case. If you misplace or lose your username/password, you will need to open a new case, as the original case will be inaccessible.

Can I file a report from home and still remain anonymous?

A report from home, a neighbor's computer, or any Internet portal will remain secure and anonymous, if you select to report anonymously, unless you identify yourself in your report. An Internet portal never identifies a visitor by screen name and the Ethics Hotline system strips away Internet addresses so that anonymity is totally maintained. Plus, Navex is contractually committed not to pursue a reporter's identity.

I am concerned that the information I provide on the Ethics Hotline will ultimately reveal my identity even if I submit it anonymously. How can you assure me that will not happen?

The Ethics Hotline system is designed to protect your anonymity. However, if you wish to remain anonymous, you, as a reporting party, need to ensure that the body of the report does not reveal your identity by accident. For example, do not include details such as "From my cube next to Jan Smith..." or "In my 33 years..."

Is the telephone toll-free hotline confidential and anonymous too?

Yes. You will be asked to provide the same information that you would provide in an internet-based report and an interviewer will type your responses into the Ethics Hotline website. These reports have the same security and confidentiality measures applied to them during delivery.

What if I want to be identified with my report?

There is a section in the report for identifying yourself, if you wish.

Is there a chance that the person(s) I am reporting on will be told that I made the report?

If these persons are based in the European Economic Area, and your report is not submitted anonymously, yes. These persons can ask Trimble to disclose all personal data that has been processed about them and that would include the information processed through the Ethics Hotline. You can prevent this from happening by reporting anonymously.

Tips & Best Practices

I am aware of some individuals involved with unethical conduct, but it doesn't affect me. Why should I bother reporting it?

Our company promotes ethical behavior. All unethical conduct, at any level, ultimately hurts the company and all employees, including you. You only have to consider what happened in recent corporate scandals to see the disastrous effects that a seemingly harmless lapse in ethics can have on an otherwise healthy company. So if you know of any serious incidents of misconduct or ethical violations, consider it your duty to yourself and your coworkers to report it.

I am not sure if what I have observed or heard is a violation of company policy, or involves unethical conduct, or is serious enough to report. What should I do?

If you are unsure, you may file a report. The Ethics Hotline can help you prepare and file your report so it can be properly understood. We'd rather you report a situation that turns out to be harmless than let possible unethical behavior go unchecked because you weren't sure.

What if my boss or other managers are involved in a violation? Won't they get the report and start a cover-up?

The Ethics Hotline system and report distribution are designed so that implicated parties are not notified or granted access to reports in which they have been named.

What if I remember something important about the incident after I file the report? Or what if the company has further questions for me concerning my report?

When you file a report at the Ethics Hotline website or through the Ethics Hotline Call Center, you will receive a unique username and will be asked to choose a password. Make a note of your username and password, so that you can return to the Ethics Hotline system again either by Internet or telephone and access the original report. This will allow you to add more detail or answer questions posed by a company representative that will help resolve your case. We strongly suggest that you return to the site in the time specified to answer company questions. You and the company have now entered into an "anonymous dialogue," where situations are not only identified, but can also be resolved, no matter how complex.

Are these follow-ups on reports as secure as the first one?

All Ethics Hotline correspondences are held in the same strict confidence as the initial report, continuing under the same umbrella of anonymity and security protocols.

Can I still file a report if I don't have access to the Internet?

You can file an Ethics Hotline report from any computer that can access the Internet. Many public locations, including the public library, have Internet computers. If you don't have access to or are uncomfortable using a computer, you can call the Ethics Hotline toll-free hotline, which is available 24 hours a day, 365 days a year.