

Policy Name <b>CONFLICT MINERALS POLICY</b>		Policy No. 602	Issue No. 8	Page 1 of 9	
		Scope		Approved Deviations	
		Worldwide		Yes	No X
Organization	Approved By		Previous Version	Effective Date	
Global Business Operations			N/A	1/1/2013	
	Alex Entrekin, Vice President Operations				

**Last Review Date: 16JAN2019**

**Policy Perspective**

Teradata opposes and condemns DRC Conflict Perpetrators, their perpetrating conduct, and the adverse consequences that conduct imposes on the people and environment of the DRC Region. Teradata supports goals, laws and initiatives that effectively (1) respect and protect human rights and the environment, (2) foster supply chain integrity, ethics, compliance, accountability and sustainability, and (3) oppose, condemn, stop, eliminate, reduce, isolate, identify and penalize DRC Conflict Perpetrators.

Teradata requires that it, its Contract-Manufacturers, other Contract-Suppliers and Upstream Suppliers take measures to comply with all applicable Conflict Minerals laws and regulations, and take measures, including those specifically set forth in this document, to eliminate and verify the elimination of DRC Targeted Conflict Minerals from all Teradata Hardware Products and Teradata Hardware Components.

Teradata encourages its Contract-Manufacturers, other Contract-Suppliers and Upstream Suppliers to adopt and apply the principles of the Responsible Business Alliance (“RBA”, formerly the Electronic Industry Citizenship Coalition (“EICC”)) Code of Conduct (including section D.7. of the RBA Code of Conduct that pertains to responsible sourcing of Conflict Minerals) and the principles of the United Nations (“UN”) Global Compact (including its Principle Two: that businesses should make sure they are not complicit in human rights abuses). Teradata also encourages its Contract-Manufacturers, other Contract-Suppliers and Upstream Suppliers to use, comply with, participate in and/or support the Responsible Mineral Initiative (“RMI”, formerly the Conflict-Free Sourcing Initiative (“CFSI”)) and its Responsible Minerals Assurance Process (“RMAP”, formerly Conflict-Free Smelters Program (“CFSP”)) and its training and reporting template resources.

**Policy Statements**

1. Conflict Minerals laws must be complied with. Teradata expects to comply and shall use reasonable efforts to comply with all applicable Conflict Minerals laws and the SEC Conflict Minerals Rules. Teradata expects its Contract-Manufacturers, other Contract-Suppliers and Upstream Suppliers to comply, use reasonable efforts to comply, and not misrepresent their compliance or efforts to comply with all applicable Conflict Minerals laws and the SEC Conflict Minerals Rules, as well as with their own

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Conflict-Minerals-related policies, contractual duties, disclosures, industry/framework pledges and other legal obligations.

2. Conflict Minerals categories and process requirements.

2.1 Teradata will require reasonable steps be taken by, through or on behalf of Teradata to reasonably and verifiably determine, identify and document, on a Timely Basis and with Reasonable Country of Origin Inquiry and other applicable Due Diligence, each Teradata Hardware Product and each Teradata Hardware Component as: (i) "Conflict-Free"; or (ii) "DRC Conflict Undeterminable"; or (iii) "Contains Targeted DRC Conflict Minerals".

2.2 Teradata will require each of its Contract-Manufacturers and (through its Contract-Manufacturers or through direct efforts by Teradata) its other Contract-Suppliers take reasonable steps with respect to each Teradata Hardware Product and each Teradata Hardware Component it manufactures, has manufactured, or supplies to:

(1) reasonably and verifiably determine, identify and document it, on a Timely Basis and with Reasonable Country of Origin Inquiry and other applicable Due Diligence, as: (i) "Conflict-Free"; or (ii) "DRC Conflict Undeterminable"; or (iii) "Contains Targeted DRC Conflict Minerals";

(2) require or seek to require each Upstream Supplier take reasonable steps with respect to each Teradata Hardware Product and Teradata Hardware Component that the Upstream Supplier manufactures or supplies to reasonably and verifiably determine, identify and document it, on a Timely Basis and with Reasonable Country of Origin Inquiry and other applicable Due Diligence, as: (i) "Conflict-Free"; or (ii) "DRC Conflict Undeterminable"; or (iii) "Contains Targeted DRC Conflict Minerals"; and

(3) provide Teradata (including its relevant subsidiaries, affiliates, auditors, consultants and other service providers) access and permission to access reasonably-requested relevant information, documents, audit data, reports, certifications and other records which pertain to or evidence Teradata's, the Contract-Manufacturer's, the Contract-Supplier's and the Upstream Supplier's compliance with this policy, applicable Conflict Minerals laws, applicable SEC Conflict Minerals Rules, and its own relevant Conflict Minerals policies, commitments, industry/framework pledges, statements, practices, procedures and programs.

3. Inclusion of "Targeted DRC Conflict Minerals" in Teradata Hardware Products or Teradata Hardware Components is prohibited. Commencing as of the initial effective date of this policy, Teradata intends to commence prohibiting Inclusion in any Teradata Hardware Product or Teradata Hardware Component any component or material that qualifies for designation as "Contains Targeted DRC Conflict Minerals" and for which a permissible exception has not been approved in writing as set forth in this

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paragraph. No exceptions or requested-exceptions to this requirement are expected, but if one does arise it must be reported, requested, explained and justified in writing to, reviewed by, and approved in writing by the Teradata Conflict Minerals Management Committee in advance of the completion of the manufacturing of the applicable Teradata Hardware Product to be permissible and not constitute a violation of this policy. Each deviation, if any, from the above-stated prohibition which has not been approved as a permissible exception must be reported promptly after initial discovery to the Teradata Chief Ethics & Compliance (“E&C”) Officer and will be treated by Teradata as an alleged E&C or policy violation in accordance with Teradata E&C policies and processes.

4. Only “Conflict-Free” Minerals will be permitted to be Included in Teradata Hardware Products and Teradata Hardware Components in the future; Inclusion of “DRC Conflict Undeterminable” Minerals in Teradata Hardware Products and Teradata Hardware Components will be discontinued. Commencing as of the binding effective date of SEC Rules and court rulings regarding or in connection with such SEC Rules (the determination of such date, if any will be imposed at all, is pending as of the issue-date of this version of this document) or such other date, if any, of which Teradata provides the applicable Contract-Manufacturer or other Contract-Supplier reasonable advance written notice) prohibit such designation or status, Teradata intends also to commence prohibiting Inclusion in any Teradata Hardware Product or Teradata Hardware Component any component or material that qualifies for designation or status as “DRC Conflict Undeterminable” and for which a permissible exception has not been approved in writing as set forth in this paragraph. Until such an effective date is established, Teradata expects and intends to require each Contract-Manufacturer and Contract-Supplier of “DRC Conflict Undeterminable” Minerals Included in Teradata Hardware Products or Teradata Hardware Components to use reasonable efforts to make demonstrable progress towards becoming “Conflict-Free” and providing Teradata, upon Teradata’s request, documentation regarding such reasonable efforts and demonstrable progress. No exceptions or requested-exceptions to this requirement are expected, but if one does arise it must be reported, requested, explained and justified in writing to, reviewed by, and approved in writing by the Teradata Conflict Minerals Management Committee in advance of the completion of the manufacturing of the applicable Teradata Hardware Product to be permissible and not constitute a violation of this policy. Each deviation, if any, from this prohibition which has not been approved as a permissible exception must be reported promptly after initial discovery to the Teradata Chief E&C Officer and will be treated by Teradata as an alleged E&C or policy violation in accordance with Teradata E&C policies and processes.

5. Records. Teradata will require reasonable steps be taken by, through or on behalf of Teradata, its Contract-Manufacturers, other Contract-Suppliers and Upstream Suppliers to retain and provide Teradata (including its relevant subsidiaries, affiliates, auditors, consultants and other service providers) reasonable access to documents and records regarding the matters covered by this policy for a period of not less than the longer of (1) the minimum amount of time required by applicable Conflict Minerals

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laws and regulations or (2) five years from when the applicable party last placed that product or component into the supply chain.

6. Management & Reporting. Teradata shall appoint and duly empower a Teradata Conflict Minerals Management Committee chartered with effectively steering, overseeing, managing, interpreting and administering this policy and its implementation, and with reporting at least annually regarding actions, processes, projects, status, compliance, audits, disclosures, recommendations and/or needs associated with such and regarding applicable Conflict Minerals awareness, guidance, frameworks, interpretations and best practices to Teradata senior management, including the Teradata Vice President of Operations and Teradata Leadership Team, and the Audit Committee of the Teradata Board of Directors. This steering committee shall include at least the following personnel (or their duly-appointed delegates): the Teradata Director of Supplier Business Operations & Procurement (“Procurement”); the Teradata Director of Platform Engineering; and, the Teradata Chief Ethics & Compliance (“E&C”) Officer.

7. Definitions.

7.1 Conflict-Free – “Conflict-Free” Minerals are Conflict Minerals reasonably verified: (1) not to originate from the DRC Region, including through a Reasonable Country of Origin Inquiry; (2) to originate solely from legitimate sources in the DRC Region and enter and flow through the supply chain and market solely through legal and legitimate mining, extraction, handling, transport, trade, smelting, refining, supply and sales channels that have been reasonably determined through Due Diligence not to perpetrate the DRC Conflict or come from, pass through or involve DRC Conflict Perpetrators; (3) to have entered the supply chain before January 31, 2013; or (4) to have been derived solely from scrapping or recycling. “Conflict-Free” products and “Conflict Free” components are manufactured goods or components and their materials which: (1) do not Include any Conflict Minerals at all; or (2) Include only Conflict-Free Minerals. The term “Conflict-Free” also includes such terms as “DRC-Conflict Free” and each other corresponding term used for the same or substantially similar category, such as may be the case through application of Conflict Minerals laws, the SEC Conflict Minerals Rules, OECD Conflict Minerals guidance, Conflict Minerals frameworks or varying Conflict Minerals policies and terminology.

7.2 Conflict Minerals - the ores of tin, tungsten, tantalum and gold, including their derivatives, such as cassiterite, columbite-tantalite, coltan and wolframite, irrespective of source or origin; also commonly referred to as “3TG” Minerals.

7.3 Contains Targeted DRC Conflict Minerals – known, determined or reasonably believed to Include, or likely to Include, Conflict Minerals that (i) originate from the DRC Region, (ii) do not otherwise qualify as “Conflict-Free” and (iii) come from, pass through or involve the DRC Conflict or DRC Conflict Perpetrators. The term “Contains Targeted DRC Conflict Minerals” also includes each corresponding term used for the same or substantially similar category, such as may be the case through

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application of Conflict Minerals laws, the SEC Conflict Minerals Rules, OECD Conflict Minerals guidance, Conflict Minerals frameworks or varying Conflict Minerals policies and terminology.

7.4 Contract-Manufacturer – a non-Teradata entity (including any of its applicable parent, subsidiary and affiliated companies) that Contract-Manufactures a Teradata Hardware Product; as of the effective date of this document, Teradata itself does not directly manufacture any Teradata Hardware Products or any Teradata Hardware Components, but rather it has Flex Ltd. (including any of its applicable parent, subsidiary and affiliated companies) (collectively “Flex”) serve as Teradata’s sole Contract-Manufacturer for all Teradata Hardware Products, and all Teradata Hardware Components, including those manufactured or supplied by other Contract-Suppliers or Upstream Suppliers, are acquired by Teradata solely from or through Flex in its role as Teradata’s sole-source Contract-Manufacturer; thus, as of the effective date of this policy, the term “Contract-Manufacturer(s)” in this document means and refers to Flex.

7.5 Contract-Manufactures – the act by a non-Teradata entity (including any of its applicable parent, subsidiary and affiliated companies) of manufacturing, completing the manufacturing, assembling or supplying of a Teradata Hardware Product (including its components) directly to or for Teradata under or pursuant to a contract between that entity and Teradata.

7.6 Contract-Supplier – a (1) Contract-Manufacturer or (2) a non-Teradata entity that (i) is a supplier of a Teradata Hardware Product or Teradata Hardware Component directly to Teradata or to a Teradata Contract-Manufacturer or other Contract-Supplier and (ii) has a direct contractual relationship with Teradata with respect to that product or component.

7.7 DRC – the Democratic Republic of the Congo.

7.8 DRC Conflict - the illegal conflict, violence, instability, armed non-government groups, criminal networks, conduct by banned or sanction-listed individuals and entities, extortion, corruption, forced labor, child labor, human-trafficking, sex-based crimes, gender-based crimes, genocide, social abuses, environmental abuses, and other human rights violations and atrocities in or adversely affecting the DRC Region. The term “DRC Conflict” also includes each corresponding term and definition used for the same or substantially similar conduct, such as may be the case through application of Conflict Minerals laws, the SEC Conflict Minerals Rules, OECD Conflict Minerals guidance, Conflict Minerals frameworks or varying Conflict Minerals policies and terminology.

7.9 DRC Conflict Perpetrators – those who are, or who are implicated with, directly or indirectly committing, contributing to, or financing the DRC Conflict through or involving the mining, extraction, handling, transport, trade, smelting, refining, supply or sale of Conflict Minerals in or from the DRC Region. The term “DRC Conflict Perpetrators” also includes each corresponding term and definition used for the same or substantially similar entities and people, such as may be the case through

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application of Conflict Minerals laws, the SEC Conflict Minerals Rules, OECD Conflict Minerals guidance, Conflict Minerals frameworks or varying Conflict Minerals policies and terminology.

7.10 DRC Conflict Undeterminable – it is undetermined or undeterminable, or the validation and/or determination is pending or in progress as to whether the product, component or material: (1) Includes any Conflict Minerals at all; or (2) Includes (i) only Conflict-Free Minerals or (ii) any Targeted DRC Conflict Minerals. The term “DRC Conflict Undeterminable” also includes each corresponding term used for the same or substantially similar category, such as may be the case through application of Conflict Minerals laws, the SEC Conflict Minerals Rules to the extent not suspended or invalidated by or in connection with U.S. court rulings, OECD Conflict Minerals guidance, Conflict Minerals frameworks or varying Conflict Minerals policies and terminology.

7.11 DRC Region – the area in and around the DRC in central Africa, including the DRC itself, Angola, Burundi, Central African Republic, Republic of the Congo, Rwanda, South Sudan, Tanzania, Uganda and Zambia; also, commonly referred to as the “Great Lakes” Region of Africa.

7.12 Due Diligence - as determined in accordance with the SEC Conflict Minerals Rules and consistent with OECD Conflict Minerals guidance and applicable Conflict Minerals frameworks.

7.13 Includes/Inclusion - contains Conflict Minerals and those Conflict Minerals are, as determined in accordance with the SEC Conflict Minerals Rules, necessary to the functionality or production of that product or component as manufactured or Contract-Manufactured.

7.14 OECD – the Organisation for Economic Co-Operation and Development.

7.15 Reasonable Country of Origin Inquiry – as determined in accordance with the SEC Conflict Minerals Rules and consistent with OECD Conflict Minerals guidance and applicable Conflict Minerals frameworks; also, commonly referred to as “RCOI”.

7.16 SEC – the United States Securities and Exchange Commission.

7.17 SEC Conflict Minerals Rules – the SEC Final Rules regarding Conflict Minerals issued on August 22, 2012 in accordance with Section 1502 of the United States Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010 (the “Dodd-Frank Act”), and any applicable changes, amendments, updates, interpretations and guidance to, for or based on them.

7.18 Teradata - Teradata Corporation, including all of its subsidiaries, affiliates and business operations throughout the world, and its and their respective employees, independent contractors, agents and other representatives.

7.19 Teradata Conflict Minerals Management Committee – the Teradata management steering committee appointed, empowered and chartered with effectively steering, overseeing, managing,

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interpreting and administering this policy and its implementation, with reporting regarding actions, processes, projects, status, compliance, audits, disclosures, recommendations and/or needs associated with such and regarding applicable Conflict Minerals awareness, guidance, frameworks, interpretations and best practices at least annually to Teradata senior management, including the Teradata Vice President of Operations (presently Alex Entekin) and Teradata Leadership Team, and the Audit Committee of the Teradata Board of Directors, and with that steering committee comprised of at least the following Teradata personnel (or their duly-appointed delegates): the Teradata Director of Procurement (presently John Bowman); the Teradata Director of Platform Engineering (presently Randy Eskridge); and, the Teradata Chief Ethics & Compliance (“E&C”) Officer (presently Todd Carver).

7.20 Teradata Hardware Component – a tangible physical item, part, assembly, product or material that is included, incorporated, further-manufactured or intended to be included, incorporated or further-manufactured into a Teradata Hardware Product.

7.21 Teradata Hardware Product – an item of manufactured equipment that (1) bears a Teradata brand, logo or trademark (including all of its components), (2) has its manufacturing completed by Teradata or a Teradata Contract-Manufacturer, and (3) is offered, sold or distributed into commerce by or through Teradata for use by a non-Teradata entity or person; for purposes of clarity, the term “Teradata Hardware Product” does not include manufactured goods that do not (1) bear a Teradata brand, logo or trademark or are not subjected to further manufacturing or completion of manufacturing by Teradata or a Teradata Contract-Manufacturer, or (2) are not intended for placement into commerce for use by a non-Teradata entity or person – such as manufactured goods that bear the brand, logo or trademark of another company and/or merely are distributed, resold or installed by or for Teradata without incorporating such as a component into a Teradata Hardware Product and without making any manufacturing changes to it (e.g., where Teradata merely resells another vendor’s product as it is without further manufacturing or completion of manufacturing by Teradata or a Teradata Contract-Manufacturer), and such as where Teradata acquires the manufactured goods solely for Teradata’s own internal use (e.g., R&D, testing, or internal Teradata end-use or operations).

7.22 Timely Basis - a commercially reasonable timeframe, but in all events no later than the earliest of (1) a mutually-agreed date, (2) a date required by applicable law or regulation, or (3) the date of completion of manufacturing of the Teradata Hardware Product at issue.

7.23 Upstream Supplier – a supplier of a Teradata Hardware Product or Teradata Hardware Component to a Teradata Contract-Manufacturer or other Contract-Supplier and does not have a direct contractual relationship with Teradata with respect to such product or component, and each of its suppliers and upstream supply-chain participants for such product or component.

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**Teradata Conflict Minerals Policy Statement Supplement**

**Teradata managers responsible for the policy and related processes**

**Executive Sponsor** – Vice President Operations, Alex Entrekin

**Key Managers**

Director of Procurement, John Bowman  
Director of Platform Engineering, Randy Eskridge  
Chief Ethics & Compliance Officer, Todd Carver

**Related Information, Documents & Policies**

- Teradata Conflict Minerals Reports – go to <http://www.teradata.com/corporate-social-responsibility> then select “Related Links”, then select “Teradata Conflict Minerals Report” for the calendar year posted
- Teradata Code of Conduct -- <http://www.teradata.com/code-of-conduct/>
- Teradata Supplier Code of Conduct -- <http://www.teradata.com/corporate-social-responsibility> and <http://www.teradata.com/code-of-conduct/>
- Teradata Business Partner Code of Conduct -- <http://www.teradata.com/corporate-social-responsibility> and <http://www.teradata.com/code-of-conduct/>
- Teradata Corporate Social Responsibility (“CSR”) Report -- <http://www.teradata.com/corporate-social-responsibility>, selecting “Related Links” then the applicable report
- United Nations (“UN”) Global Compact Principles (Teradata is a signatory to the UN Global Compact, Teradata has adopted the UN Global Compact Principles, and the Teradata CSR Report serves as the Teradata Communication On Progress required for UN Global Compact active participation) -- <https://www.unglobalcompact.org/what-is-gc/mission/principles>
- Responsible Business Alliance (“RBA”, formerly the Electronics Industry Citizenship Coalition (“EICC”)) Code of Conduct (Teradata has adopted the principles of the RBA Code of Conduct and incorporates them into the Teradata Code of Conduct for Suppliers) -- <http://www.responsiblebusiness.org/standards/code-of-conduct/>.
- Flex Conflict-Minerals-related policies, practices and initiatives (Flex is the sole-source Contract-Manufacturer of all Teradata Hardware Products and Teradata Hardware Components as of the effective date of this policy; Flex is identified as a member of the RBA, having adopted the principles of the RBA Code of Conduct, and applying those principles to its suppliers and supply chain; Flex is identified a user, participant and/or supporter of the Responsible Minerals



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Initiation (“RMI”, formerly the EICC-GeSI Conflict-Free Sourcing Initiative (“CFSI”)) --

<http://www.responsiblemineralsinitiative.org/>.

- SEC Conflict Minerals rules, information and documents --  
<http://www.sec.gov/rules/final/2012/34-67716.pdf>;  
<http://www.sec.gov/News/Article/Detail/Article/1365171562058>;  
<http://www.sec.gov/info/smallbus/secg/conflict-minerals-disclosure-small-entity-compliance-guide.htm>; <http://www.sec.gov/divisions/corpfin/guidance/conflictminerals-faq.htm>
- OECD (Organisation for Economic Co-Operation and Development) Conflict Minerals guidance, frameworks, information and documents --  
<http://www.oecd.org/daf/inv/mne/GuidanceEdition2.pdf>;
- <http://www.oecd.org/daf/inv/mne/OECD-Due-Diligence-Guidance-Minerals-Edition3.pdf>;  
[http://mneguidelines.oecd.org/Brochure\\_OECD-Responsible-Mineral-Supply-Chains.pdf](http://mneguidelines.oecd.org/Brochure_OECD-Responsible-Mineral-Supply-Chains.pdf);  
<http://www.oecd.org/daf/inv/mne/mining.htm>
- Teradata internal Corporate Management Policies (“CMP”s), including:
  - 601 – Environmental, Health & Safety (“EHS”) Management & Compliance – externally accessible through links at <http://www.teradata.com/corporate-social-responsibility/environmental-health-and-safety/>
  - 604 – Product Design
  - 904 – Standards for Business Conduct (Zero-Tolerance for Bribery, Corruption and Money-Laundering; Global Anti-Corruption Policy) – externally accessible through links at <http://www.teradata.com/code-of-conduct/>
  - 913 – Contracts
  - 917 – Import Compliance
  - 919 – Export Compliance
  - 1800 – Quality
- Teradata internal Corporate Finance and Accounting Policies (“CFAP”s), including:
  - 103 – Independent External Auditors
  - 105 – Internal Audit
  - 106 – External Reporting
  - 111 – Record Retention
  - 815 – Procurement

[END]