



Bruker Corporation

Conflict Minerals Policy

Background

The ongoing conflict and extreme violence in the Democratic Republic of the Congo and adjoining countries (“DRC Region”) are fueled in part from trade in “conflict minerals,” which include tantalum, tin, tungsten, and gold or any of their derivatives (also known as the 3TGs).

In an effort to eventually eliminate the funding of the armed groups responsible for this violence within the DRC Region, Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act (the “Dodd-Frank Act”) and implementing rules adopted by the United States Securities and Exchange Commission (“SEC”) require all U.S. public companies to determine whether the commercial products they manufacture or contract to manufacture contain conflict minerals necessary to the functionality or production of those products and the source of such minerals.

The intent of the legislation is to provide transparency along the supply chain and to encourage companies to make responsible sourcing decisions. Pursuant to SEC rules, effective beginning with fiscal year 2013, U.S. public companies that manufacture or contract to manufacture products that contain conflict minerals are required to annually file Form SD and, if necessary, a detailed Conflict Minerals Report with the SEC. Bruker Corporation and its consolidated subsidiaries (“Bruker,” “we,” “us,” “our” or the “Company”) are committed to complying with our reporting and disclosure requirements as mandated by the Dodd-Frank Act and the rules and regulations of the SEC.

Company Approach

Bruker is committed to working towards the elimination of the use of conflict minerals that directly or indirectly finance or benefit armed groups in the DRC Region. We will work with our supply chain partners to take reasonable steps to ensure our products are eventually considered “DRC Conflict Free.” To attain DRC Conflict Free status, the product, and all of its contents, containing conflict minerals must be either:

- a) produced from scrap/recycled material;
- b) sourced completely outside of the DRC Region, including the mines where the ores originated from and the downstream smelters; or



- c) sourced from the DRC Region, but with an adequate chain of custody established from the mine to a conflict free smelter. Many smelters are undergoing certification as a conflict free smelter by a recognized program, such as the EICC-GeSI Conflict Free Smelter program. This will enable these smelters to guarantee to their customers the conflict-free nature of their product.

Our efforts will include educating our suppliers, as necessary, on the requirements under the Dodd-Frank Act related to conflict minerals and this Conflict Minerals Policy. Additionally, we will survey our suppliers about the origin or source of conflict minerals used in the materials or products they provide to us and the status of their conflict minerals due diligence efforts. If we identify a reasonable risk that a supplier is providing materials or products to us that are not DRC Conflict Free, we will engage with that supplier to implement a corrective action plan to transition to DRC Conflict Free status over time.

Expectation of Suppliers

Bruker expects its suppliers to:

- Complete our Conflict Minerals survey as requested, identifying conflict minerals in the products they sell to us and the smelter that provided the original conflict minerals material. Our direct suppliers may need to require successive upstream suppliers to complete our Conflict Minerals survey until the smelter is identified.
- Exercise due diligence on the source and chain of custody of conflict minerals in their supply chains by working with their suppliers to develop an understanding of the origin of conflict minerals or to confirm that the conflict minerals did not originate from the DRC or were obtained from recycled or scrap sources.
- Engage with us to implement a corrective action plan to transition those products or materials reasonably determined to not be conflict free to DRC Conflict Free status.

Failure of a supplier to comply with the requirements set forth in this Conflict Minerals Policy, including implementing a corrective action plan, may result in Bruker discontinuing its business relationship with the supplier.