Conflicts Minerals Policy

Integrity is one of Autodesk’s core values. We believe that running our business with integrity includes managing our supply chain in an ethical and socially responsible way and promoting and protecting human rights wherever we do business.

Although we are primarily a software company and the vast majority of our products and services are software, we do manufacture a limited number of hardware products. Like many companies in the technology industry, we are concerned by reports that trade in conflict minerals mined in the Democratic Republic of the Congo and adjoining countries (the “Covered Countries”) may be funding violent militias that have committed atrocities in those countries. These minerals include tin, tungsten, tantalum, and gold, each of which is often used in electronics.

Autodesk supports industry-wide efforts to encourage responsible sourcing of conflict minerals and transparency in supply chains, including efforts by the Electronic Industry Citizenship Coalition, which has established supply chain standards to promote social, ethical, and environmental responsibility. Furthermore, in 2012, the U.S. Securities and Exchange Commission adopted a rule pursuant to Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act that requires publicly-traded companies to disclose whether the products they manufacture or contract to manufacture contain necessary conflict minerals that originate from the Covered Countries, and, if so, to disclose information about the source and chain of custody of those conflict minerals (the “conflict minerals rule”).

Autodesk continues to comply with the conflict minerals rule, and we are committed to working with our direct suppliers to ensure transparency in our supply chain. We expect our direct suppliers to assist us in our ongoing compliance and due diligence efforts by providing all necessary information using the Conflict Minerals Reporting Template developed by the Conflict-Free Sourcing Initiative. Autodesk will evaluate the information provided by its suppliers and to the extent those responses indicate a risk that the supplier is not complying with this Policy, Autodesk’s management reserves the right to evaluate the supplier relationship and take any appropriate action. Finally, we have implemented a conflict minerals due diligence program that is designed to conform, in all material respects, with the due diligence framework set forth in the Organisation for Economic Co-operation and Development’s “Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.”