

Expanding Human Possibility with Integrity:
OUR CODE OF CONDUCT



**Rockwell
Automation**





"We have earned our
reputation for integrity
through our rigorous commitment to
quality, safety, and business ethics."

Message from Our Chairman & CEO

Dear Fellow Employee,

At Rockwell Automation, we have earned our reputation for integrity through our rigorous commitment to quality, safety, and business ethics. This reputation is our greatest competitive advantage. It helps us recruit and retain the best talent, partner with top organizations, and maintain trusting relationships with our customers, partners, and suppliers. Our continued success hinges on our ability to maintain integrity in everything we do.

We are a global leader in industrial automation and digital transformation. We connect the imaginations of people with the potential of technology to expand what is humanly possible, making the world more productive and sustainable. We work hard to meet our business goals but never at the expense of our ethical standards. At Rockwell Automation, we'd rather lose business than do business the wrong way.

Our Code of Conduct establishes the rules that we follow as we work. It provides a framework for all of our decisions and actions and offers resources for asking questions and getting help. If an issue arises that this Code cannot help you answer, or if you have concerns about possible violations of law or company policy, don't hesitate to reach out to your manager, Human Resources, a company lawyer, or the Office of the Ombuds. But no matter who you reach out to, speaking up is essential to a culture of integrity.

Rockwell Automation's strategy is to bring our Connected Enterprise® products and services to life with great employees who can and want to do their best work. Thank you for your commitment to ethics, integrity and our values each and every day.

Sincerely,



Blake Moret

Chairman and Chief Executive Officer

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OUR CULTURE

Our Foundation for Accelerated Growth

(Click on each of the Pillars to reveal additional information)

A woman with long, wavy brown hair and blue eyes, wearing a white button-down shirt and a red lanyard with a badge, is engaged in a conversation with a man. The man is seen from the side, wearing a light blue shirt and glasses. They are in a busy trade show environment with other people and bright lights in the background. The woman's lanyard has 'Rockwell Automation' printed on it. The man's hand is visible, gesturing during the conversation.

commitment to integrity

No matter our position, department, or location, we never cut corners and always do the right thing. We comply with all applicable laws and follow company policies.



Our Code

At Rockwell Automation, we conduct business in accordance with all applicable laws and with the highest ethical standards. Our Code of Conduct helps us do that. It embodies our values and helps us maintain a work environment of respect, honesty, and unquestioned integrity.

As you read and get to know our Code, please note any questions you may have and be sure to seek clarification from your manager, Human Resources, a company lawyer, or the Office of the Ombuds. Asking questions and raising concerns is an integral part of a culture of integrity.

Our Code applies at all times to every Rockwell Automation employee worldwide, including everyone employed by our subsidiaries and controlled affiliates, and our Board of Directors. There are no exceptions: Our Code is enforced regardless of an employee's rank or position in the company.

Failure to follow our Code or failure to report a known violation may lead to disciplinary action, up to and including termination of employment.

Your Role

All Rockwell Automation employees must follow our Code, our policies, and the law. Our continued success rests on our ability to maintain the high standards of business conduct for which we are known.

Unethical behavior is wrong and can damage our reputation. In our transparent and digitally connected world, information about bad acts can become public in an instant. When faced with a difficult choice or ethical "gray area," ask yourself:



- **Does this decision align with Rockwell Automation's values?**
- **Is it consistent with company policies, rules, and the law?**
- **Could I defend my decision to the public?**

If you can't definitively answer "yes" to these questions, STOP. Make a different choice or seek guidance from your manager, Human Resources, a company lawyer, or the Office of the Ombuds. Rockwell Automation's integrity and business reputation are depending on you.

You are Rockwell Automation. Make sure your actions always reflect our values.

TELL ME MORE: Ombuds

Our Ombuds is someone who gives advice about and ensures investigation of Code of Conduct issues. The Office of the Ombuds is designed to be independent and is expressly empowered to investigate any allegation of employee misconduct in the workplace. The Ombuds reports directly to the Board of Directors. The Ombuds also manages systems to allow confidential or anonymous reports. The Ombuds may appoint Regional Ombuds resources as needed to assist in the reporting and handling of cases. Together they are referred to as the "Office of the Ombuds."

AS IT HAPPENED: *Graham, a plant manager, discovers that one of his team members has been incorrectly recording warehouse expenditures. This error has led to inaccurate financial reporting for the plant. He knows that if he reports the error, it will reflect negatively on him and his plant. He's tempted to just ignore it – after all, he's not the one making the error and the issue is not readily apparent unless someone really examines the books carefully. What should he do?*

Graham should immediately report the issue. We all have a duty to speak up when we see that something is wrong – even if it may be an "innocent mistake" or even if you might feel as if it is "not your problem." No concern about potential misconduct is too minor to report.

Manager's Role

Though all employees are personally accountable for following our Code, managers have the added responsibilities of leading by example, setting high expectations for conduct within their team, and being responsive to questions and concerns. All Rockwell Automation managers must:

- Ensure that their team members read and understand our Code
- Help team members understand how the Code relates to their jobs
- Use the Code as a tool for discussion around work environment, team performance, and individual integrity
- Maintain an open-door policy where employees feel comfortable asking questions and reporting concerns
- Escalate and report allegations of misconduct and verify that swift and appropriate action is taken to address reported concerns
- Ensure that employees who raise concerns in good faith are protected from retaliation

Asking Questions and Reporting Concerns

Acting with integrity means more than just holding ourselves accountable. It also means that we do not turn a blind eye to the concerning behavior or actions of others. We must be prepared to speak up immediately when questions or concerns arise. Misconduct affects all of us.

In most cases, your manager should be your first stop for any questions and conversations. However, there may be times when you have difficult questions that your manager is not able to answer. In that case, you can talk to any of the following resources:

- Another member of management
- Human Resources (HR)
- A company lawyer
- Office of the Ombuds (anonymous and confidential reporting available)

No Retaliation

Rockwell Automation does not tolerate retaliation. No employee should ever engage in any form of harassment or negative action that is meant to silence or punish others for speaking up in good faith or participating in an investigation. If you observe or are subjected to retaliation, report it to the Office of the Ombuds or a company lawyer so that the situation can be investigated and corrected. Anyone who retaliates against an employee for speaking up in good faith might be subject to disciplinary action, including termination.

Reports must be made honestly, fairly, and in good faith. Dishonest or false reporting is prohibited.

“By speaking up, you preserve and build our culture. We rely on all employees to be the eyes and ears of the company. So, if you see or hear something that is wrong, speak up.” – Blake Moret



CODE VIOLATIONS CARRY CONSEQUENCES

When our Code is broken, there can be serious repercussions for our company, including reputational damage, loss of business, and civil and criminal fines and penalties. Employees may also face civil and criminal penalties, as well as disciplinary action or termination.

AS IT HAPPENED: Anne, an assistant in the IT department, reports Katharine, her manager, for a conflict of interest violation. It turns out to be a misunderstanding – Katharine did nothing wrong. However, Katharine seems angry that she was investigated, and she seems to suspect that it was Anne who reported her. She starts leaving Anne out of communications and team meetings, criticizing her in front of other employees, and giving her poor performance reviews. What should Anne do?

She should report Katharine again, this time for retaliation. As long as Anne is making reports in good faith, she's doing the right thing. If the investigation finds that Katharine has engaged in retaliatory behavior, she will face disciplinary action, including possible termination.



INVESTIGATIONS

- We take all reports seriously, and all reports to the Office of the Ombuds are logged and handled in accordance with our [Code of Conduct Allegations Procedure](#).
- We take confidentiality seriously as well. When you contact the Ombuds, you have the option to remain anonymous (though providing your name helps with follow-ups). If you give your name but tell the Ombuds that you want your name held in confidence, the Ombuds will do so to the greatest extent possible.
- We are committed to fair and thorough investigations. When the Office of the Ombuds receives an allegation, it works diligently to determine the facts. Investigators will examine records, talk to witnesses, and allow all involved parties to tell their side of the story. Typically, we do not inform a manager that an investigation of an employee is underway to preserve confidentiality as much as possible.
- If the Office of the Ombuds determines that an employee has violated our Code, the Office of the Ombuds will then inform the employee's manager, and we will take appropriate corrective or disciplinary action.
- If you report a concern to the Ombuds or participate in an investigation, the Ombuds will communicate with you about the outcome. But be aware that confidential details about the investigation's result or any employee discipline may not be shared.
- We expect our employees to cooperate fully and honestly in any investigation conducted by the Office of the Ombuds.
- If you are a manager and you become aware of an allegation, you have an obligation to immediately escalate that allegation to the Office of the Ombuds or to more senior management. You should not attempt to conduct any investigation yourself.
- Managers also must prevent any retaliation against employees who bring forward allegations. No employees will be punished in any way for speaking up.



commitment to each other

At Rockwell Automation, our promise is that we expand human possibility – a promise that starts with our own employees. Valuing the diversity of our people and ensuring a safe, inclusive, and respectful work environment fosters greater trust, flexibility, creativity, and satisfaction within our company and community.



AS IT HAPPENED: Archie sees a co-worker operating a machine without using its protective guard. He points this out to his co-worker, who insists that the guard gets in the way and is not necessary. What should Archie do?

Safety comes first – even when it's inconvenient. Archie should immediately report the situation to his manager, the Environmental, Health & Safety (EHS) Team, Human Resources, a company lawyer, or the Office of the Ombuds.

Workplace Safety

Nothing is more important than the safety and security of our employees. We owe it to ourselves and our co-workers to maintain a safe workplace, avoid occupational injuries, follow all safety rules and regulations, and do all we can to protect each other from injuries.

Rockwell Automation does not tolerate intimidation, threats, or violence in any form. Prohibited behavior includes:

- Aggressive or hostile behavior that leads to emotional distress or fear of injury
- Threatening remarks
- Possessing a weapon on company property, in company-owned vehicles, or while on company business
- Physical or verbal assault

For more information see our [People Policy](#).

AS IT HAPPENED: Isam's co-worker often uses threatening and abusive language when she's frustrated. She has said things like, "One of these days I am just going to blow this whole place up" and, "There are so many lazy people here, I would be doing the world a favor if I took them all out." Isam has begun to feel anxiety about going to work on days that he knows he'll have to interact with her. What should he do?

Isam should immediately report his observations and concerns to the security team, his manager, another manager, Human Resources, a company lawyer, or the Office of the Ombuds. These kinds of violent workplace threats must be dealt with immediately.

INTEGRITY IN PRACTICE

Being safe means we...

- Comply with all safety and health laws and procedures
- Only perform work for which we are trained and competent
- Do not use alcohol, illegal substances, or anything that could impair our judgment while on the job
- Behave in a way that respects the physical and emotional safety of others
- Report unsafe situations and all workplace accidents, injuries, and illnesses



TELL ME MORE: Mobbing

Mobbing refers to the bullying of an individual by a group. It happens when co-workers “gang up” to harass someone through rumor, innuendo, intimidation, humiliation, or exclusion.

AS IT HAPPENED: *Ada received a promotion that Leo was vying for. Leo then started calling Ada “peg leg” and “bionic woman,” because Ada uses a prosthetic leg. Ada finds Leo’s behavior upsetting. She has days where she dreads coming to work, knowing that she’ll likely have to face his insults. What should Ada do?*

Leo’s bullying is unacceptable. Ada should talk to her manager, Human Resources, a company lawyer, or the Office of the Ombuds as soon as possible. Workplace harassment can often escalate, so it’s best to address the situation early.

Harassment and Bullying/Mobbing

We are all entitled to a work environment of mutual trust and respect that is free from aggression, improper pressure, and intimidation. Our team works best when we consider how we treat each other and do not make derogatory remarks or engage in any harassing behavior. This doesn’t mean that managers cannot hold employees accountable for their work, but it does mean that we will not harass or bully each other.

For more information see our [People Policy](#).

INTEGRITY IN PRACTICE.

Mutual respect means we...

- Do not make disparaging personal remarks
- Never engage in mockery, humiliation, malicious gossip, bullying, or mobbing
- Never engage in physical and verbal intimidation

Harassment in all its forms, including workplace violence and discrimination, is prohibited to maintain a workplace that is safe, secure, respectful, and inclusive for everyone.

Sexual Harassment

Sexual harassment is a form of harassment that involves unwelcome sexual comments or advances, requests for sexual favors, or other verbal or physical conduct of a sexual nature that adversely affects an individual's employment opportunities, interferes with his or her performance, or creates an intimidating or hostile environment.

For more information see our [People Policy](#).

Harassment in any form undermines equality and adversely impacts the dignity and well-being of employees. It creates anxiety and stress for the targets of such behavior and can result in widespread loss of productivity, low morale, absenteeism, staff turnover, and legal action. Rockwell Automation has no tolerance for this conduct.



AS IT HAPPENED: When Mae's co-worker talks to her, he often touches her in a way that makes her feel uncomfortable. He does the same thing to other female employees, but Mae can't tell if it bothers them or not. Should she say something?

Yes. Anyone experiencing unwanted physical contact should report it to their manager, Human Resources, a company lawyer, or the Office of the Ombuds, regardless of how that contact may be viewed or experienced by others.

AS IT HAPPENED: Hong is traveling for business with his supervisor, Lisa. After meeting at the client's facilities, Hong and Lisa are heading back to the hotel when Lisa suggests that Hong spend the night in her room. Hong declines. Lisa seems angry but doesn't say anything further to Hong that evening. On the trip back home, Lisa tells Hong that it would be better if he did not say anything to anyone about her suggestion. What should Hong do?

Hong should report Lisa's behavior, including her attempt to silence him, to his manager, Human Resources, a company lawyer, or the Office of the Ombuds as soon as possible.

TELL ME MORE: Discrimination

Discrimination is the different or less favorable treatment of someone based on their race, religion, color, national origin, age, sex, sexual orientation, gender identity, marital status, physical or mental disability, veteran status, medical condition (including pregnancy), genetic information, or any other characteristic protected by applicable law.

AS IT HAPPENED: *George is a manager whose department is hiring. One of the candidates he interviews is in a wheelchair. George knows that ramps would have to be installed to accommodate a wheelchair, and he is concerned about the time it would take, as well as the business expense. Should he remove the candidate from consideration?*

No. Regardless of whether it is legally mandated, it is our policy to make reasonable accommodations for employees with disabilities, and Rockwell Automation does not discriminate in its hiring practices. George should only consider the candidate's knowledge, skills, and abilities as they relate to the requirements for the position.

OUR CODE IS CLEAR:

We don't discriminate – and we don't ignore discrimination happening around us.



Diversity and Inclusion

Rockwell Automation knows that diverse teams make better decisions, and inclusion fuels innovation. We treat one another with dignity and respect, foster a culture of inclusion, and have no tolerance for discrimination.

For more information about our expectation that all employees will be safe and secure at work and free from discrimination and harassment, see our [People Policy](#).

INTEGRITY IN PRACTICE

Being inclusive means we...

- Value the unique characteristics of all employees and support differences
- Treat others fairly, with respect and consideration
- Acknowledge our unconscious biases
- Strive to create an environment where everyone feels a strong sense of welcome and belonging

Not discriminating means we...

- Provide fair and equal employment opportunities to all qualified applicants and employees
- Base all employment-related decisions on job-related factors such as performance, skills, experience, and future business needs
- Treat all employees fairly, regardless of their race, religion, color, national origin, age, sex, sexual orientation, gender identity, marital status, physical or mental disability, veteran status, medical condition (including pregnancy), genetic information, or any other characteristic protected by applicable law



Employee Privacy

Business purposes often require Rockwell Automation to collect, use, and store employee personal data. Personal data may include:

- Contact details, such as address or phone number
- Identification details, such as Social Security or driver's license numbers
- Medical information
- Financial information
- Employment history
- Background check data
- Other data that an employee would reasonably expect to remain confidential

We respect and protect personal data. This means we ensure that personal data is only used and collected for approved, legitimate purposes and that personal data is accessible only to people who have a justified need to know. It means we keep close track of the systems handling personal data while implementing appropriate privacy risk control measures. And it also means that we always follow privacy requirements in case of a data breach incident and ensure that third parties processing our data meet our privacy security expectations.

Rockwell Automation has also established a privacy office that is focused on ensuring we have the right policies and procedures in place to protect personal data.

For more information, see our [Privacy Policy](#).

AS IT HAPPENED: *Ayanna works in Human Resources, and she is approached by her friend Sam who believes that some of his co-workers are being paid more than he is for doing the same job. He asks if she can check a few co-workers' records just to see what they are being paid. What should Ayanna do?*

Ayanna should not grant Sam's request. She should never share the personal information of Rockwell Automation employees without their permission or a legitimate business purpose. She should also report Sam's request to his manager, Human Resources, a company lawyer, or the Office of the Ombuds.

AS IT HAPPENED: *Catherine works in Human Resources and was informed by a medical check services provider that its systems had been hacked. The hackers may have gained access to sensitive medical data of our employees in our vendor's systems.*

Catherine informed her manager and the privacy office and, together, they supported the vendor in assessing the risks, in reviewing the actions taken to mitigate the incident, and in informing the privacy authorities and affected employees.

INTEGRITY IN PRACTICE

Protecting employee privacy means we...

- Are committed to properly securing our employees' personal information
- Are committed to following all policies, procedures, and applicable privacy laws
- Take care when accessing, collecting, using, storing, transmitting, and destroying the personal data of our employees

A woman with long dark hair, wearing a grey Rockwell Automation vest over a light blue shirt, is looking intently at a computer screen. The background is blurred, showing what appears to be an office or industrial setting. The text is overlaid on the left side of the image.

commitment **to customers and partners**

At Rockwell Automation, we solve customer problems – and we do so fairly and with integrity. We earn and maintain customer trust by being diligent, respectful, and honest.



AS IT HAPPENED: *Norbert's cousin owns a small software business. This business does not compete with any Rockwell Automation product, so he has asked Norbert for the contact information for a few of Rockwell Automation's key customers to see if he can market this software to them. Is it OK for Norbert to share this information?*

No. Norbert should not access, use, or share customer data unless there is an authorized business reason to do so or the customers have provided consent. Otherwise, we would breach our confidentiality obligations towards our customers and enable Norbert's cousin to spam (send unsolicited marketing) our customers.

Customer Privacy

We are committed to respecting and properly securing the private information of our customers and our partners. Customer personal data relates to the personal data of people working for our customers and partners, which may include information such as:

- Business contact details, such as name, title, address, email, and phone number
- Marketing information, such as participation in conferences, seminars, and webinars, and logs of visits to websites and other social media, through cookies or otherwise
- Operational information, such as operational data of operators at a customer factory where we install and maintain solutions or provide other services

As we do with employee data, we are committed to following all policies, procedures, and applicable laws when accessing, collecting, using, storing, transmitting, and destroying customer personal data.

For more information, see our [Privacy Policy](#) and our [Privacy and Cookies Policy](#).

INTEGRITY IN PRACTICE

Protecting customer privacy means we...

- Work to ensure that our customers and partners receive transparent information about the collection and use of their personal data
- Secure the consent of customers and partners when using cookies and when we send marketing materials as required
- Consider privacy risks when we collect personal data from or provide it to third parties

Fair Competition

Fair competition is an essential part of the free enterprise system. It is our policy to compete fairly and to comply with all applicable competition and antitrust laws. We never seek to gain an advantage in the market by making unfair agreements with competitors, customers, or suppliers. Our channel partners are separate and independent entities; as such, we do not set their resale prices or control their business operations.

Nearly all countries where Rockwell Automation does business have laws governing fair competition in order to protect customers and the free enterprise system. These laws are especially important in Rockwell Automation's business environment because we often work with distributors, systems integrators, or other value-added partners, and we sometimes team with our competitors to provide packaged solutions for our customers. This ecosystem can make complying with all of the rules tricky. Whenever you have questions or concerns about how to proceed, be sure to consult with a company lawyer.

INTEGRITY IN PRACTICE

Competing fairly means we...

- Win business the right way, on the merits of our products, services, and prices
- Never restrain competition by setting prices in concert with a competitor, selling below cost, rigging bids, dividing customers, restricting trade, or excluding competitors
- Avoid unnecessary contact and communication with our competitors and never discuss or request pricing, strategies, terms of sale, costs, business plans, customers, or territories with them, whether directly or indirectly
- Make unilateral and independent decisions about our sales and pricing
- Never communicate information about our bids or bid strategy to other potential bidders
- Never consider, pursue, or agree to either a non-compete or non-solicit agreement or a merger, acquisition, or joint venture, unless it has been reviewed and approved by a company lawyer

TELL ME MORE: Antitrust

Competition laws are sometimes called "antitrust laws," because they were originally designed to regulate large corporate "trusts" that were able to monopolize certain markets. In general, the rules promote fair and honest competition and protect businesses, suppliers, and customers from anticompetitive practices. They prohibit behavior like price fixing, bid rigging, market allocation, dividing customers, group boycotts, anticompetitive agreements, and other practices that limit or impact competition.

Rockwell Automation employees must be mindful of the competition laws and avoid engaging in anticompetitive behavior. For example, Rockwell Automation would be prohibited from making an agreement with a European competitor to not do business in Europe as long as the competitor agreed to stay out of the United States. Doing that would deny customers the benefit and opportunity of having different choices. A marketplace works best when everyone competes to sell the best products at the best price. But if a company manipulates the market in order to make it easier to win, then the customer loses, and that's what competition laws prohibit.

A good rule of thumb: if the action you are planning to take limits a customer's choices in the marketplace, then it may violate competition laws. Seek guidance from a company lawyer before you act.

CODE DEFINED: OUR PARTNERS

Rockwell Automation partners include distributors, systems integrators, contractors, suppliers, and service providers.

AS IT HAPPENED: *During a trade association meeting, Margaret socializes with the representatives of several competing companies. One representative asks the group to review her company's pricing policies. Margaret isn't sure if this is OK. What should she do?*

Before participating in any trade association meeting, Rockwell Automation employees must review the meeting's agenda and list of participants to make sure they understand what subjects are going to be discussed and who will be present. During social activities at trade association events or other meetings where competitors are present, keep the conversation social and do not discuss information about Rockwell Automation's business strategies. No matter how informal the discussion, it is illegal for competitors to agree to fix prices (i.e. to adopt the same or similar prices) or make any other agreement that constrains competition. Even when no agreement is made, it might look like the competitors reached an understanding if the discussion of prices is followed by similar pricing actions. In Margaret's case, she should state that it is against our policy to discuss pricing with competitors and immediately leave the gathering. She should then promptly report the incident to a company lawyer.



Competition laws are complex, and violations are not only a Code of Conduct violation, but they can result in severe penalties in various countries, including fines and potential incarceration for organizations and individuals. Please contact a company lawyer if you have any questions or concerns. By seeking guidance early on, you can avoid inadvertently engaging in inappropriate or unlawful behavior. For more information, also see the [Rockwell Automation Global Antitrust and Competition Law Compliance Manual](#).

Working with Our Partners

We pride ourselves on our integrity, and we choose to deal with partners who hold themselves to similarly high standards. We believe that working with ethical partners is critical to our ongoing success and good business reputation.

INTEGRITY IN PRACTICE

Our commitment to our partners means we...

- Select our partners fairly, based on quality, service, efficiency, and price
- Work with our partners to prohibit bribery and corruption in business dealings with or on behalf of the company
- Investigate any potential partner's reputation for ethical conduct
- Perform periodic monitoring of partner businesses' ethics
- Ensure that partners understand and agree to the terms of the [Partner Network Code of Conduct](#) or the [Supplier Code of Conduct](#) and our [Anti-Corruption Policy](#)
- Confirm that our partners are aware of the Rockwell Automation Office of the Ombuds program

A photograph of two men in a factory environment. Both are wearing yellow hard hats and safety glasses. The man on the left is wearing a light blue button-down shirt and is gesturing with his right hand while speaking. The man on the right is wearing a grey button-down shirt with a 'Rockwell Automation' logo on the chest and is holding a tablet computer. The background shows industrial equipment and factory lighting.

commitment to **Rockwell Automation**

At Rockwell Automation, we are truthful and transparent in our pursuit of excellence. We show our commitment to each other and the company by taking our roles and responsibilities seriously and by acting ethically in all of our dealings.



Personal Relationships and Conflicts of Interest

We have an obligation to our customers, suppliers, and shareowners to ensure that business decisions are based only on quality, price, delivery, reputation, and experience. Business decisions must not be influenced by external considerations or interests. If a potential conflict exists, we are required to report it so that the company can manage the situation and avoid an actual conflict.

A personal conflict of interest refers to situations in which an employee's personal relationship threatens to impair the employee's ability to act in the best interest of the company. The most common personal relationships that can influence your judgment are the ones with close family and friends. And it's not the type of relationship that creates the problem, but whether the relationship causes you to put the interests of the family member or friend before your obligations to Rockwell Automation.

We have an obligation to our customers, suppliers, and shareowners to ensure that business decisions are based only on quality, price, delivery, reputation, and experience.

TELL ME MORE: Conflict of Interest

A conflict of interest occurs when an employee has an interest in, or obligation to, another person or business that might conflict with that employee's obligations or loyalty to our company. In other words, your decision-making could be in conflict. Your loyalty to Rockwell Automation may pull you in one direction, but your interest in some other factor (such as a friend, a relative, or a personal financial interest) may pull you in another direction.

Many conflicts of interest can be managed. For example, we may allow your spouse or close relative to work at Rockwell Automation. But any potential conflict must be disclosed immediately so that it can be managed appropriately with full transparency.

AS IT HAPPENED: *Hedy is a manager of a team, and a new position has opened up for hiring. Hedy's brother has the required skills for the position. He is an extremely hard worker and would be a great addition to Rockwell Automation. Can Hedy hire and then supervise her brother?*

No. Even if Hedy could be completely unbiased (which may be difficult), hiring her brother would still create the appearance of a conflict of interest. It's likely that the other members of Hedy's team and other candidates would feel that the process was unfair. In order for her brother to be considered as a candidate, Hedy would need to disclose their relationship and then remove herself from both the hiring process and the subsequent management of the position.

AS IT HAPPENED: *Nora is dating Thomas. Rockwell Automation just acquired the company Thomas works for, and now he will be reporting to Nora. Does Nora have to disclose their dating relationship?*

Yes. While their personal relationship predates Nora's supervision of Thomas, it is the sort of circumstance that can give rise to a potential conflict or at least the appearance of one. She should disclose the relationship.



Not every personal relationship will prove to be problematic, but because even the appearance of a conflict of interest can be detrimental to the company, we must report any and all personal relationships that do, could, or appear to create a conflict. Failure to report a relationship can lead to disciplinary action, up to and including termination.

To disclose a potential personal conflict of interest, report it to your manager, and complete and submit the [Conflict of Interest Disclosure form](#).

Financial Relationships and Conflicts of Interest

A financial conflict of interest refers to situations in which an employee is at risk of putting his or her financial interests over the best interests of Rockwell Automation. Common financial relationships that might cause a conflict include being a shareholder or director of, or other financial beneficiary in one of our suppliers, customers, or even competitors.

Merely having a financial interest does not mean there will be a conflict. Often, the type of financial interest will determine whether the relationship is likely to cause a conflict. For example, a small shareholding in a publicly traded company is unlikely to pose a problem, but if you hold a significant ownership interest in a Rockwell Automation supplier, you are more likely to benefit directly from any decision made in favor of that company.

Also, your role within Rockwell Automation will play a part. If you own an interest in a company supplier and you had the ability to influence Rockwell Automation's business decisions regarding suppliers and partners, the risk of a conflict would be heightened.

To seek clarification regarding potential conflicts of interest, talk to your manager, Human Resources, a company lawyer, or the Office of the Ombuds.

To disclose a potential financial conflict of interest, report it to your manager, and then complete and submit the [Conflict of Interest Disclosure form](#).

AS IT HAPPENED: *Zhang works for Rockwell Automation as an engineer and was approached by a customer to provide consulting services. Zhang isn't sure whether Rockwell Automation would even want this work, and these side projects for the customer would not affect his work at Rockwell Automation, since he could work on these projects in the evening and on weekends. Is this OK?*

No. Zhang can't take opportunities that rightly belong to Rockwell Automation, and working for himself may mean he's acting in a way that is disadvantageous to, or in conflict with, the company. If Zhang has any questions about working on side projects, his best course of action is to talk to his manager, Human Resources, a company lawyer, or the Office of the Ombuds before he agrees to any arrangement so that they can help him determine if a conflict exists and what course of action to take.

INTEGRITY IN PRACTICE

Being conflict-free means we...

- Deal with partners, customers, and third parties fairly, without seeking any personal advantage
- Disclose all personal and financial interests that could be interpreted as conflicts of interest
- Report any actual or potential conflict of interest created due to a close personal relationship with another person at Rockwell Automation (for example: because of a promotion, a good friend now reports to you)
- Don't perform work for Rockwell Automation customers "on the side"

TELL ME MORE: Gifts

A gift is something given to another person without further involvement by the gift-giver and without direct impact on the business dealings between the gift-giver and the recipient. Examples of acceptable gifts include flowers, food baskets, pens, notebooks, and company-logo promotional materials. Examples of unacceptable gifts include cash, cash equivalents (such as gift cards), and lavish items such as a designer handbag or watch.

TELL ME MORE: Hospitality

Hospitality is payment for goods or services on behalf of another person in connection with a business transaction. Examples of acceptable hospitality include a business lunch with a customer where a Rockwell Automation employee picks up the tab or attending a midseason sporting event with a supplier where the supplier provides the tickets. Examples of inappropriate entertainment would include an all-expenses-paid trip to a premier sporting event, an expensive dinner that includes multiple premium bottles of wine, or a visit to an "adult" entertainment venue.

Gifts and Hospitality

We conduct business purely on business considerations. We must be cautious when giving and receiving gifts and hospitality so that they do not become – or appear to become – a means to improperly influence a business decision or gain an unfair advantage. While the modest and reasonable exchange of gifts and hospitality in the business world is customary and allowable, employees must exercise good judgment to avoid the appearance of bribery or a conflict of interest.

Rockwell Automation's [Gifts and Hospitality \(Entertainment\) Limits Chart](#) further clarifies these distinctions by setting specific dollar limitations and indicating the levels of approval that are required in order to give or accept gifts or hospitality.

In order to minimize risk, any gifts or hospitality we give or receive must be:

- Connected to a business purpose
- At a suitable time and place
- Of nominal value
- Infrequent
- Unsolicited
- Non-monetary (i.e., not cash or a cash equivalent, such as a bank gift card)
- Properly documented
- In compliance with our [Anti-Corruption Policy](#) and our [Business Travel and Entertainment Policy](#)
- In compliance with applicable legal requirements, including local laws and regulations
- Within the limits noted in our [Gifts and Hospitality \(Entertainment\) Limits Chart](#).

Employees should consult the [Gifts and Hospitality \(Entertainment\) Limits Chart](#) and be familiar with limits and exceptions.

INTEGRITY IN PRACTICE

When exchanging gifts and hospitality we...

- Provide only small and customary gifts and never expensive or lavish ones
- Provide only routine business entertainment such as lunches, dinners, or casual sporting events and never provide entertainment that is excessive or inappropriate
- Never accept any gift or hospitality that creates a sense of obligation or compromises our professional judgment or impartiality

Special care should be taken with government customers, as they are subject to laws that strictly limit gifts and hospitality. In addition, many times it is not always clear that a customer or vendor is actually a governmental entity. In some countries, commercial enterprises such as oil and gas companies, hospitals, transportation-affiliated enterprises, or universities are all entirely owned by the government and thus, would be government entities. If you work with government customers, you must know and understand who your customer is and educate yourself on these laws. Consult with your manager or a company lawyer to ensure that you understand the applicable legal restrictions.

Additionally, many countries have laws that restrict gift-giving and hospitality globally, in both the public and private sectors. These restrictions apply to your actions and the actions of those who represent us in the marketplace, such as distributors or agents. You must understand and abide by these restrictions and ensure that anyone representing Rockwell Automation does as well. It is never acceptable to look the other way.

For more information, see [Rockwell Automation Anti-Corruption Policy](#).



AS IT HAPPENED: *An overseas customer with whom Henry has developed a strong business relationship has sent him an expensive watch. The customer insists that the watch is simply a thank-you for the effort that Henry dedicated to their last project and that it comes with “no strings attached.” Henry knows that accepting the watch would violate Rockwell Automation policy, but he’s concerned that returning it might offend the customer. What should he do?*

Henry should politely reject the gift and explain to the customer that accepting it would violate company policy and put his job at risk; he should also report both the gift and the return of the gift to the Ombuds, his manager, Human Resources or a company lawyer. In nearly all cases, the gift giver understands the purpose of our policy and accepts the explanation. In very rare circumstances, our [Gifts and Hospitality \(Entertainment\) Limits Chart](#) allows accepting or giving items that are more expensive than the allowable limits, if doing so is approved by a high-level member of management. Henry could escalate the issue to his manager, Human Resources, a company lawyer, or the Office of the Ombuds to seek guidance and/or approval.



AS IT HAPPENED: *Beatrix wants to make sure that her business meets its numbers for the quarterly reporting period ending this week, so she's planning to book a sale now that won't be shipped until next week. Is this OK?*

No. Costs and revenues must be recorded in the correct time periods. The sale is not complete until there is evidence of a sales agreement, the title has passed (which generally requires shipment of a product), and the sales price can be determined and is reasonably collectible. Since all of these things haven't yet happened, it would be a misrepresentation to include the sale in the current reporting period. We must keep truthful records that reflect the integrity with which we conduct business.

Books and Records

As a publicly held corporation, we have a responsibility to our shareowners, employees, and partners to keep accurate and up-to-date records in a manner that's consistent with established procedures and all applicable laws. Whether the records are timecards, expense reports, general accounting documents, or purchasing invoices, each of us has a personal responsibility to ensure that every record we handle is complete and correct.

For more information, see our [Internal Control Policy](#), our [Business Travel and Entertainment Policy](#), and our [Records Retention Policy](#).

INTEGRITY IN PRACTICE

Being accountable means we...

- Are familiar with all record-keeping procedures that apply to our role
- Immediately report any errors or mistakes to a supervisor
- Promptly comply when our auditors or a company lawyer or compliance professional requests information or records
- Remove, erase, or destroy records only when consistent with our record retention policy
- Follow Rockwell Automation policies for documenting travel and entertainment expenses
- Never make false or misleading entries in any company record

Company Assets

Our company assets are the tools that allow us to get our work done effectively. They include office supplies, facilities, tools, equipment, technology, and other items of value that belong to Rockwell Automation. We must all use company resources – and the property and technology of partners, suppliers, and customers – appropriately and in accordance with our [Acceptable Use of Technology Policy](#).

AS IT HAPPENED: *Ellen's children attend a local school that needs office supplies such as markers, lined paper, and tape. She notices that these supplies are rarely used at the company office, and there is a large amount in the supply cabinet. Is it OK for her to take some of these supplies for the school?*

No. Company assets, such as equipment, tools and supplies should only be used for Rockwell Automation business purposes.

INTEGRITY IN PRACTICE

Protecting company assets means we...

- Use company assets for completing our job; any personal use should be reasonable, never interfere with our job duties, and be consistent with our Code
- Work to conserve and protect Rockwell Automation's assets



AS IT HAPPENED: *Elijah accepted another job outside of Rockwell Automation, and his last day at work will be at the end of the month. About two weeks before his departure, as he is wrapping up his final projects, he decides that several documents, templates, and slide decks that he worked on could be helpful to him in his new job. He downloads copies of those documents to a removable storage device and takes them home. He also sends some helpful emails from his archives to his home email account. Is this OK?*

No. The data and information that Elijah worked on during his job at Rockwell Automation belongs to the company, and it's not proper for him to take it with him. In addition, it's possible that his work files contain nonpublic information that he has an obligation to safeguard. Elijah should neither download nor email any nonpublic information to use after leaving Rockwell Automation.



Sensitive and Proprietary Information

Company information and data is a company asset that can only be used for business purposes, and it cannot be taken or used by employees outside of work. In addition, at Rockwell Automation, we often work with restricted and confidential information owned by the company and others, such as trade secrets, customer data, business strategies, financial statements, research and development plans, and other nonpublic business information. If you have questions about whether specific information is considered sensitive, you should ask your supervisor or consult with the Global & Information Security (G&IS) Office or a company lawyer. It's critical that we protect sensitive information from misuse, theft, or loss. The unauthorized use or disclosure of sensitive information could compromise customer trust in our company and may result in criminal penalties. Similarly, we must ensure that we do not obtain or use confidential information of third parties without authorization.

For more information, see our [Safeguarding Sensitive Information Policy](#).

INTEGRITY IN PRACTICE

Maintaining sensitive information means we...

- Only store, share, or handle confidential or restricted data in an approved and authorized manner
- Do not disclose confidential information to any third parties unless the disclosure is properly authorized
- Follow all obligations under confidentiality agreements with Rockwell Automation or other companies
- Place appropriate labels (for example, "Rockwell Automation Confidential") on sensitive company documents
- Do not use company information for personal benefit or share it with others

Data Security

We protect our data by following our data security policies, including our [Information Security Policy](#) and [Safeguarding Sensitive Information Policy](#), and we take all security processes seriously in order to protect our company data and that of our customers and partners. We also report any concerns we might have regarding data security, or any possible data breach, immediately to Global & Information Security (G&IS).

In order to safeguard sensitive information in our possession, Rockwell Automation may monitor employee data and system use for indications of mishandling or compromise. There is a process in place to review employee use of our systems when warranted and in accordance with local laws and regulations.

For more information, see our [G&IS Governance Page](#).

INTEGRITY IN PRACTICE

Keeping our data secure means we...

- Follow all data security policies, standards, and procedures to keep data secure
- Download or store Rockwell Automation data only on authorized devices
- Report any potential data breach immediately to Global & Information Security

We protect our data by following our data security policies, including our Information Security Policy and Safeguarding Sensitive Information Policy, and we take all security processes seriously so that we might protect our data and that of our customers and partners.



TELL ME MORE: Intellectual Property

Intellectual property refers to intangible rights in creative works such as inventions, works of authorship, and names. It can be protected with patents, trademarks, and copyrights.

AS IT HAPPENED: *Lalitha has recently left Rockwell Automation for a competitor and is competing against us for a major contract. A pricing system she developed when she worked for Rockwell Automation is still being used today. If she shares that information about the system with her manager at her new company, Lalitha's team could gain an advantage. Is this OK?*

No. Our pricing system is likely considered proprietary information, and Lalitha has an obligation to Rockwell Automation not to use or disclose such information. Lalitha should maintain the confidentiality of our company's intellectual property even after her employment with Rockwell Automation ends.



Intellectual Property

We protect our intellectual property to shelter the innovations of our employees. Additionally, intellectual property safeguards help us protect our customers by ensuring that our products are safe, authentic, and reliable.

We respect the intellectual property of others, utilizing it only after having properly secured the rights to do so.

We expect you to maintain the confidentiality of any former employer's proprietary information just as you would respect the confidentiality of Rockwell Automation's proprietary information should you leave the company.

INTEGRITY IN PRACTICE

Respecting intellectual property means we...

- Obtain permission and, if applicable, enter into agreements before using intellectual property owned by others, including copyrights and trademarks
- Respect patents, trademarks, copyrights, and other intellectual property in our product development, advertisements, and marketing
- Understand that the works of authorship and inventions we create at Rockwell Automation are the property of Rockwell Automation



External Communication and Social Media

We are respectful, honest, and accurate in all company communications. We take care to ensure that external company communications protect Rockwell Automation's reputation and intellectual property. Social media can be a great communication tool, but we must all be careful to consider what we are saying and the impression we are creating before we post. Rockwell Automation does not support social media posts that violate our Code or our policies or are otherwise abusive or threatening.

For more information, see our [Communications and Social Media Policy](#).

TELL ME MORE: Company Communications

Our policy on external communications covers all communications that refer to or relate to Rockwell Automation or a person's relationship with Rockwell Automation, regardless of the purpose of the communication (e.g. personal, work related), the communication method (e.g. written, verbal), the communication vehicle (e.g. hard copy, email, social media) or the audience (e.g. other employees, customers, general public). This does NOT mean the company is monitoring your private communications. But if you communicate about the company, our policy applies.

AS IT HAPPENED: *Alan discovers a social media post that makes inaccurate claims about Rockwell Automation's business practices. Alan would like to add a comment in defense of the company. Should he?*

No. As an employee, Alan's response could be interpreted as speaking on behalf of Rockwell Automation. Instead, Alan should report the post using any of the normal reporting outlets (his manager, Human Resources, a company lawyer or the Ombuds), or, in this case, he could also report it to External Communications, to determine if a response is warranted.

INTEGRITY IN PRACTICE

Communicating respectfully means we:

- Don't speak publicly on behalf of Rockwell Automation unless authorized to do so
- Communicate confidential information only as permitted by company policy or applicable law
- Carefully consider our social media posting and its effect
- Seek help from a manager, Human Resources, a company lawyer, or the Office of the Ombuds if we're not sure how to handle an external inquiry or request
- Cooperate with all legal and proper requests from government officials

commitment to the community



"Integrity is much more than one of our company values. It is embedded in everything we do, from how we work together, to how we buy and sell, to our day-to-day business dealings."

– Blake Moret



TELL ME MORE: Anything of Value

"Anything of value" is a legal phrase that can mean almost anything – including money, gifts, favors, entertainment, and opportunities. Things of value are not problematic in and of themselves. Corruption occurs when something of value is offered in an effort to improperly influence a business decision.

TELL ME MORE: Government Official

A government official is a person employed by a government or an employee of a business that is owned or controlled by a government, such as an engineer who works for a state-owned oil company. It can also include politicians and those who work for international institutions, like the World Bank. The Foreign Corrupt Practices Act (FCPA) contains strict provisions regarding interactions with government officials and expressly prohibits giving "anything of value" to any government official outside the United States. So, if any part of your job at Rockwell Automation involves working with government entities (or seemingly private companies that are owned by state governments), make sure you are familiar with these rules.

At Rockwell Automation, we have an unwavering commitment to responsible business practices. Because we care deeply about the communities where we live and work, we are dedicated to making a positive impact for our people and the communities where we live and work around the world.

Anti-Corruption

We win business with our superior products and customer service. We do not cut corners, give or receive bribes, or engage in corrupt activities. We also don't allow partners or third parties to bribe on our behalf.

We do not give anything of value to a commercial partner or government official in order to gain or retain business, secure a business advantage, or otherwise improperly influence business decisions.

We are careful when we give gifts or provide hospitality, and we accurately keep track of related expenses. We follow the guidance in our [Anti-Corruption Policy](#) and [Business Travel and Entertainment Policy](#), and we comply with the limits noted in our [Gift and Hospitality \(Entertainment\) Limits Chart](#). (See also the section above regarding Gifts and Entertainment).

INTEGRITY IN PRACTICE

Fighting corruption means we...

- Comply with the law, follow our policies, and maintain our ethical standards
- Never attempt to influence a business decision by providing something of value
- Maintain transparent relationships with government officials, partners, suppliers, and customers
- Never offer or accept bribes, and never work with third parties who do
- Don't turn a blind eye. We cannot be willfully ignorant of bribery. If we have suspicions, then we must ask questions and demand answers.
- Maintain accurate and complete records of all business expenses
- Never offer or accept a "kickback" payment for facilitating a deal or transaction
- Don't assume that because "everyone else does it," we can do it with or for Rockwell Automation. We cannot.

Bribery and corruption laws are complex, so defying them may result not only in Code of Conduct violations, but in severe penalties for breaking criminal and anti-bribery anti-corruption laws in various countries. Please contact a company lawyer if you have any questions or concerns. By seeking guidance early on, you can avoid inadvertently engaging in inappropriate or unlawful behavior.

Trade Compliance

To successfully import and export products around the world, we must abide by applicable import and export laws, regulations, and policies that govern our business globally. This includes laws governing the trade of goods, software, and technical data, as well as those regarding embargoes and other economic sanctions. And as a U.S.-based company, we cannot cooperate with any boycott or other restrictive trade practice not authorized by the U.S. government.

Trade laws can be complicated, and they frequently change, so employees involved in importing and exporting must understand its governing rules and regulations and seek guidance when questions arise. Even discussions about certain kinds of technology may be considered an export under the law. Failure to successfully navigate trade laws can result in severe consequences for the company and the employee, such as adverse publicity, seizure of shipments, loss of import and export privileges, and civil and criminal penalties.

For more information, please see our [Trade Policy](#) and/or contact the Global Trade Compliance team.

AS IT HAPPENED: Shirley is negotiating a contract with an electric utility company. One of her contacts at that company has a daughter who is a senior engineering student. This contact asks Shirley to offer his daughter a summer internship at Rockwell Automation “as a show of good faith.” Is this an issue?

Yes. Requesting something of value – in this case, an internship – to secure a business benefit constitutes bribery. In addition, many utilities and power generation companies are government-owned or government-controlled, so this request could be a criminal violation under the FCPA or other anti-bribery laws. Shirley should immediately cease discussions with the contact and consult with a company lawyer.

AS IT HAPPENED: Mario is traveling to Poland for a technical meeting. While there, he plans to contact several companies to discuss Rockwell Automation products and capabilities, discussions that will include reviewing technical specifications. Will Mario need to get special approvals to have these discussions?

Possibly. Certain licenses are often required to “export” technical data. Discussions that include technical data can be considered exports. Mario should contact Global Trade Compliance or the import/export contact for his location to determine if an export license or other government approvals are required to discuss the data.

INTEGRITY IN PRACTICE

Upholding compliance in trade means we...

- Understand and follow all company policies and procedures relating to importing and exporting
- Obtain required internal approvals before utilizing any special or preferential program and maintain sufficient processes and resources for ongoing compliance
- Ensure that complete and accurate information, including company-assigned classifications, is used for import and export declarations
- Examine documents and correspondence for boycott language, then escalate as appropriate
- Confirm that any necessary authorizations are in place prior to import and export transactions



AS IT HAPPENED: *Elsie visits a supplier's factory overseas and notices that some of the workers appear to be very young. She's not sure what the local labor laws are, and the factory is not operated by Rockwell Automation. Should she say something?*

Yes. Even if Elsie's not sure that the supplier is doing anything wrong, she should still report her concern to her manager, Human Resources, a company lawyer, or the Office of the Ombuds. The correct department will then be able to verify whether the supplier is abiding by Rockwell Automation's Supplier Code of Conduct and the laws regarding child labor.

Human Rights

We respect and support the dignity of all our workers, and we uphold human rights by providing working conditions that are fair, non-discriminatory, equitable, and safe.

We expect that all of our partners will do the same and that they will support human rights and fair, safe, and equitable working conditions.

We strongly condemn all forms of forced compulsory labor, exploitative child labor, and participation in human trafficking by any person or organization, as well as any modern forms of slavery.

For more information, see our [Social Responsibility and Sustainability Policy](#), our [Partner Network Code of Conduct](#), or our [Supplier Code of Conduct](#).

INTEGRITY IN PRACTICE

Defending human rights means we...

- Follow all applicable labor regulations and laws
- Don't allow or tolerate any form of forced labor, slavery, human trafficking, or child labor
- Provide equal employment opportunities and prohibit illegal employment discrimination
- Prohibit the use of corporal punishment, mental or physical coercion, and verbal abuse
- Oppose all exploitative working conditions
- Are alert to any signs of abuse or coercion within our operations or supply chains and speak up if we see or suspect possible labor or human rights violations

Environmental Protection and Sustainability

We are committed to protecting people and the environment. Following waste disposal procedures and other safe environmental practices is not only required by our policies and applicable laws, but it is also the right thing to do for our neighbors. We are dedicated to ensuring that our company, employees, and communities are not exposed to environmental risks.

For more information, see our [Social Responsibility and Sustainability Policy](#).

INTEGRITY IN PRACTICE

Protecting the environment means we...

- Follow all environmental policies, procedures, laws, and regulations
- Reduce, minimize, or eliminate the generating of waste and the release of potentially hazardous materials into the environment
- Prioritize environmental protection and the conservation of energy and raw materials
- Supply customers with a portfolio of products, services, and solutions that enable our operations to be cleaner, safer, and more resource efficient

While our products and services contribute to the sustainable operations of our customers, we are also committed to minimizing our own environmental impact around the world.

AS IT HAPPENED: *Lynn is working in a lab on a project involving the use of a nitric acid solution, a regulated hazardous material. During the test, several gallons of diluted acid spill onto the floor and flow into the floor drain. Lynn is not injured. What should she do?*

Lynn should immediately mitigate the spill following our safety procedures and then report the incident to the facility emergency organization. Certain hazardous material spills must be reported to environmental agencies. Concealing a spill violates our policy and may violate the law.





TELL ME MORE: Material Nonpublic Information

Information that is not public and that a reasonable investor would consider important in determining whether to trade securities, such as: pending financial information, information about mergers or acquisitions, changes in leadership, product, or marketing plans, or other significant business transactions.

Insider Trading

Insider trading is illegal. In order to protect the investing public, securities laws make it illegal for those with material nonpublic information (“inside information”) to buy or sell securities (stocks, bonds, options, etc.). To promote compliance with the securities laws, our policy is to prohibit trading in our securities on the basis of inside information related to our company.

We also prohibit anyone from using or disclosing (through “tipping”) any inside information about our company or inside information about any other company learned through their employment at Rockwell Automation for the purpose of trading securities. Anyone who violates the insider trading prohibitions of the securities laws may be subject to serious civil and criminal liabilities and sanctions, as well as company disciplinary action up to and including termination.

We have established additional procedures that apply to all officers, members of the Board of Directors, and certain employees with regular access to earnings information or other material nonpublic information. These procedures, which include pre-clearance and trading window requirements, are described in our Trading Procedures for Insiders. You will be notified if you are subject to these additional procedures.

For more information, see [Trading Procedures for Insiders](#).

INTEGRITY IN PRACTICE

Following insider trading rules means we ...

- Don't trade securities using material nonpublic information
- Don't tip third parties by providing them with material nonpublic information
- Follow the trading instructions in our [Trading Procedures for Insiders](#)



Hedging and Pledging

Hedging transactions, such as forward sale contracts, collars, equity swaps, exchange funds, and similar derivative transactions, are designed to hedge or offset any decrease in the market value of equity securities and allow the holder to continue to own the covered securities but without the full risks and rewards of ownership.

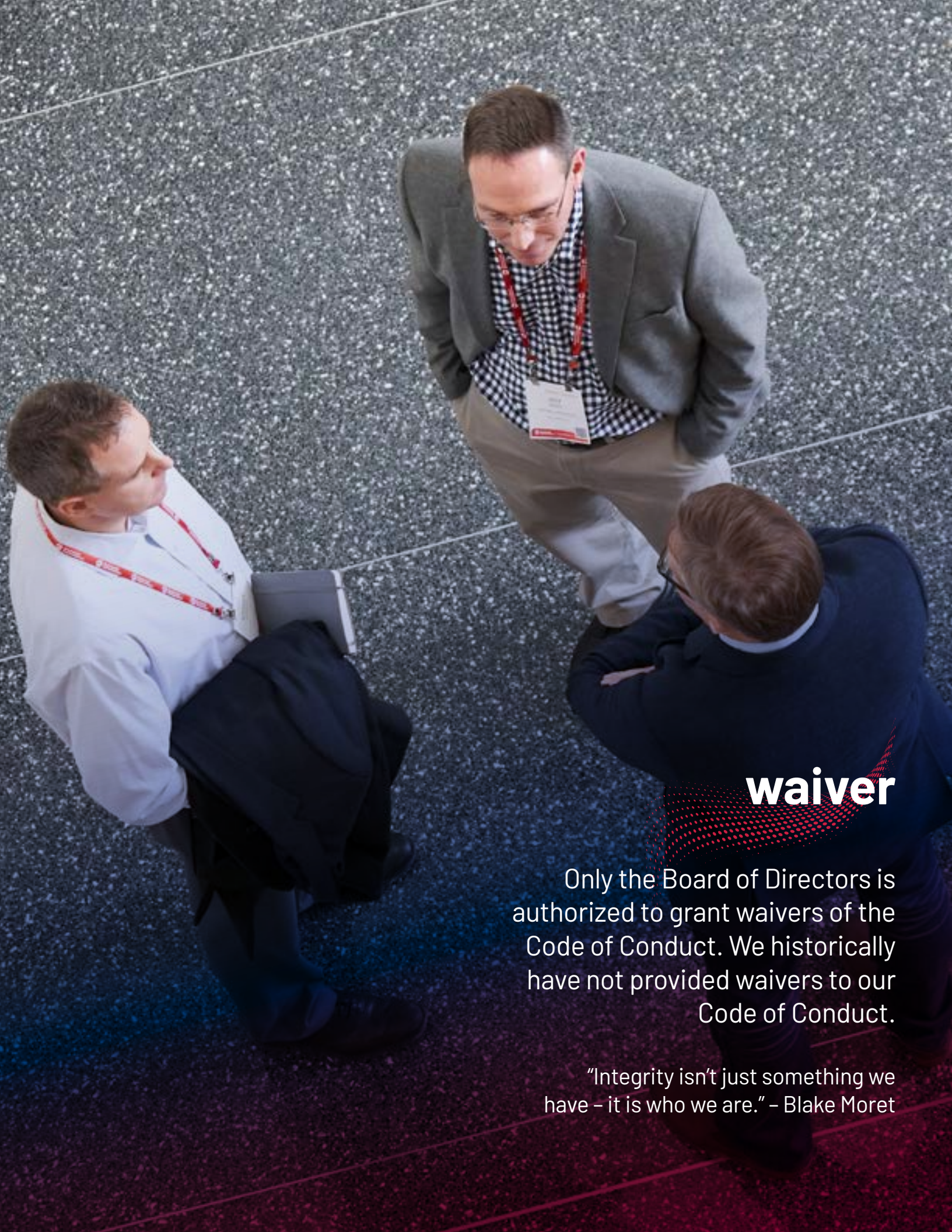
If you engage in these types of transactions, your interests are no longer aligned with shareowners, and you are prohibited from engaging in any transaction that is designed or intended to hedge or otherwise limit your exposure to decreases in the market value of our securities.

All officers and members of the Board of Directors of the Company are strictly prohibited from directly or indirectly pledging Company securities. "Pledging" includes the creation of any form of pledge, security interest, deposit, or lien, including the holding of shares in a margin account, that entitles a third party to foreclose against, or otherwise sell, the shares.

For more information, see [Trading Procedures for Insiders](#).

AS IT HAPPENED: Nikola has just learned that Rockwell Automation is planning to acquire another company. The acquisition is not yet public. Can Nikola encourage his brother to buy more stock, as long as he doesn't tell him why?

No. Nikola would be making a recommendation based on material nonpublic information, which is against our policy and U.S. securities laws.



waiver

Only the Board of Directors is authorized to grant waivers of the Code of Conduct. We historically have not provided waivers to our Code of Conduct.

"Integrity isn't just something we have – it is who we are." – Blake Moret

What exactly is the Office of the Ombuds?

Your resource for reporting wrongdoing or asking advice

OFFICE OF THE OMBUDS

What happens when I contact the Ombuds?



You can remain anonymous.



If you ask for advice, you will receive it.



Your report of an actual or potential violation of our Code of Conduct will be investigated and addressed.



Your good faith report of an actual or potential violation of our Code of Conduct can be made without fear of retaliation.

PHONE NUMBERS

Australia 1-800-431-011
* Belgium 0-800-100-10
Brazil 0800-892-0455
Canada 1-800-552-3589
China 4006612279
* Denmark 800-100-10
France 0800-91-1105
* Germany 0-800-225-5288
Hong Kong 800-96-1591
* Hungary 06-800-011-11
* India 000-117
Italy 800-790861
Japan 0120922603
Malaysia 1-800-88-5682

Mexico 001-844-737-2814
Netherlands 0800-029-2042
* New Zealand 000-911
Philippines (line 1) 1010-5511-00
Philippines (line 2) 105-11
Poland 00-800-151-0322
Singapore 800-110-2395
South Africa 0800-660-010
Korea, Republic of
00798-1-1-003-9036
* Switzerland 0-800-890011
* Taiwan 00-801-102-880
United Kingdom 0808-234-0709
United States 1-800-552-3589

How do I contact the Ombuds?

EMAIL

ombuds@ra.rockwell.com

ALERT-LINE

rockwellautomation.ethicspoint.com

MAILING ADDRESS

Rockwell Automation Ombuds
1201 South Second Street
Milwaukee, Wisconsin
53204-2410, U.S.A.

** These countries will need to dial their above listed country-specific access code, and then dial (844) 473-0162 when prompted.*

Connect with us.    

rockwellautomation.com — expanding **human possibility**[®]

AMERICAS: Rockwell Automation, 1201 South Second Street, Milwaukee, WI 53204-2496 USA, Tel: (1) 414.382.2000, Fax: (1) 414.382.4444

EUROPE/MIDDLE EAST/AFRICA: Rockwell Automation NV, Pegasus Park, De Kleetlaan 12a, 1831 Diegem, Belgium, Tel: (32) 2 663 0600, Fax: (32) 2 663 0640

ASIA PACIFIC: Rockwell Automation, Level 14, Core F, Cyberport 3, 100 Cyberport Road, Hong Kong, Tel: (852) 2887 4788, Fax: (852) 2508 1846

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