

Global Policy Communications and Social Media

We must talk about the Company in a way that protects its reputation and promotes its brand identities honestly and accurately, whichever form of media we use to communicate.

WHO IS THIS POLICY FOR?

All Employees.

Key Policy Principles

- This policy applies to all communications that refer or relate to the **Company** or a person's relationship with the Company ("Company Communications").
- Any communication that refers or relates to the Company or a person's relationship with the Company is a Company Communication regardless of the purpose of the communication (e.g. personal or work related), the communication method (e.g. written, oral), the communication vehicle (e.g. hard copy or electronic, including the internet and **Social Media**) or the actual or intended audience (e.g., **Employees** or third parties like customers, vendors, media, investors, stakeholders or the general public).
- Company Communications must protect the Company's reputation, good name, brand identities and intellectual property. Employees also should try to exemplify the Company values in their Company Communications – including our customer focus, innovation, pursuit of excellence, speed and integrity.
- **NEVER** communicate non-public information about the Company or any of its customers, channel partners or suppliers to a third party unless you have been expressly authorized to do so. Such non-public information can include but is not limited to confidential financial, sales or operational information or comments about future business plans or performance.
- Communicating about the Company is not the same as communicating on behalf of the Company. You may only communicate on behalf of the Company if you are specifically authorized to do so. This policy will help to define who is permitted to speak on behalf of the Company and where to direct requests for information from third parties.
- Nothing in this policy is intended to restrict your rights under any law or regulation to discuss your own pay or other terms and conditions of employment with Employees or non-employees.

Company Communications Generally

- The content of all Company Communication must comply with this policy and all other applicable policies, standards and guidelines. The supporting material at the end of this policy will help you better understand the other Company policies, standards or guidelines.

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- You may not speak on behalf of the Company unless you have been expressly authorized to do so and you follow the requirements of this policy and all other applicable policies, standards and guidelines.
 - You must direct information requests to the appropriate spokespersons within the Company.
 - Many of us use Social Media or other interactive web technologies to communicate in our work and personal lives. If your online posts include Company Communications, those posts must adhere to this policy and the related guidelines and procedures it references.
 - When communicating **Confidential Information**, you must follow the requirements of our Safeguarding Confidential Information Policy and ensure the information will be properly handled and protected from misuse or improper disclosure.
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Disclosing Material Non-Public Information

- We are committed to providing timely, consistent and accurate information about the Company to the public in compliance with our legal and regulatory requirements.
 - As a public company, we are obligated to provide certain information about the Company to shareowners and potential investors and we are prohibited from selectively disclosing **Material Non-Public Information** to the public.
 - We must apply consistent disclosure practices that provide for simultaneous broad dissemination of information to the public when releasing Material Non-Public Information. All disclosures of Material Non-Public Information must comply with the Disclosure of Material Information Procedure to ensure compliance with our legal obligations.
 - No one should externally communicate Material Non-Public Information without appropriate authority. Material Non-Public Information can include, but is not limited to, confidential financial, sales or operational information, comments about future business plans or performance, significant potential litigation, and unannounced acquisitions and divestitures or any information that has substantial likelihood that an investor would consider it important in making an investment decision.
 - Contact a Company lawyer or the Vice President of Investor Relations **before** you act if you have any questions about whether the content you want to communicate contains Material Non-Public Information about the Company.
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Internet, Social Media and Other Electronic Communications

- You are personally responsible for, and can be personally liable for, the content you publish on the internet, including content posted to Social Media sites and other interactive web technologies.
- If your online communications, including your personal online communications, contain Company Communications, you must follow this policy and the Company's Guidelines for Social Media and Other On-line Communications.
- The Company currently maintains several **Company-Sponsored Social Media Sites**. You must complete and submit an application to the **Corporate Communications Council** if you want to create a Company-Sponsored Social Media Site.

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- After you get approval to create a Company-Sponsored Social Media Site, you must follow the process established by the marketing department to create and maintain the site.
- If you are seeking to speak on behalf of the Company on a Social Media site you must be approved by the [Social Media Council](#) as a [Designated Online Representative](#) and obtain a [Social Media Certification](#) before beginning or continuing to speak on behalf of the Company online.
- Generally, we do not consider postings on Social Media to be [Company Records](#). We will not preserve or retain Social Media postings as part of our archives or business records.
- You may not publish information of any kind regarding the Company, its products, operations or plans on external Company websites without prior consent of the Web Manager or the Country Marketing Manager.
- You may not use or approve the use of Rockwell Automation logos, copyrighted material or proprietary material on the internet, including on third-party websites, without obtaining approval from the Brand Identity Manager and ensuring that the content posted complies with the Company's brand identity guidelines.
- You must coordinate requests to register domain names on behalf of the Company or any product brands anywhere in the world through the Company IT Manager, Global Information Security.
- The use of e-mail in today's business world is a necessary and important tool, but when used inappropriately, e-mail can negatively impact the Company. Therefore, you must follow applicable Company policies, including the Using Technology Resources Policy.

News Releases, Media Statements, and Other External Publications

- The external communications and legal departments must review and approve **in advance**, all news releases and media statements to be distributed, including through news wire services such as PR Newswire or Business wire. This includes Company-generated news releases and media statements as well as news releases and media statements generated by others that mention the Company.
- The marketing department must review and approve non-proprietary information (e.g. marketing materials) **before** the information is publicly distributed in any form including electronically. The review is intended to ensure that the information is consistent with the Company's branding strategy, undergoes any necessary internal review and does not contain Material Non-Public Information.

Crisis Communications

In the event of a crisis, you should contact the Rockwell Automation Emergency line, 1-414-350-8001, before conducting any internal or external communications activities. The Company Crisis Management Plan supersedes all other guidelines for handling information requests during normal business operations.

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Third Party Requests for Information

At various times the Company receives requests for information by telephone, e-mail, fax, letter or even during casual conversation at trade shows and other events. Regardless of the method of inquiry, information requests should be handled as follows:

- Trade media inquiries must be directed to the marketing department or its designated agency representative.
- Business/financial and other news media inquiries must be directed to the external communications department.
- Local media inquiries must be directed to the appropriate marketing department or the external communications department.
- Inquiries by shareholders, securities analysts and investment professionals must be directed to the investor relations office.
- Securities analysts or other investment professionals requesting information must be directed to the VP, Investor Relations, Manager or Director, Investor Relations or Designee of Chief Executive Officer or Chief Financial Officer.

Speaking Engagements and Presentations by Company Employees

- If you present to an external audience your presentation should only include information within your area of responsibility and already in the public domain. All speeches and presentations must comply with this policy, brand standards and other applicable Company or [Business Unit](#) policies. You must get approval from the external communications and investor relations departments before making the appearance if your presentation is related to the financial performance of the Company, a [Business Segment, Region, or Function](#).
- You should never disclose Material Non-Public Information. Please contact a Company lawyer or the Investor Relations group if you are unsure if the material you plan to present contains Material Non-Public Information.
- You may not present to securities market professionals and investors unless expressly authorized in the Disclosure of Material Information Procedure.

Endorsements

The external communications department must approve endorsement requests. In general, endorsements will be approved if:

- There is a significant strategic value in the endorsement for the Company.
- Rockwell Automation is satisfied fully with the product/company, and expects a high level of satisfaction to remain for the foreseeable future.
- It can be verified that the endorsement will not cause a customer or other conflict.
- The final design and text of the endorsement can be reviewed and approved prior to publication.
- Provisions of the agreement allow revocation of the approval at any time.