Rockwell Automation Code of Conduct

Ethics Is Good Business and Integrity Is the Bottom Line
Dear Fellow Employee:

Rockwell Automation has a reputation for integrity that is a Company hallmark and an underlying value in all our business transactions. Our relationships with customers, suppliers, shareowners, governments and employees – and our future success – depend upon maintaining that integrity in everything we do. We have achieved success by adhering to the highest standards of legal and ethical conduct. And we will continue to be the most valued global provider of power, control and information solutions through an unwavering commitment to integrity. It is a personal responsibility, one we owe to our shareowners, customers, communities and each other. We must strive to succeed in all our business endeavors, but never at the expense of our ethical standards. This principle applies everywhere we do business.

This Code of Conduct can help you make the right choices when questions concerning proper business conduct arise. It’s available on our Company website, Global Rain (Look in A-Z, Ethics and Compliance Center, or Policies and Procedures). If an issue arises that this Code of Conduct cannot help you answer, or if you know of or believe there might be violations of laws or Company policies, talk to your manager, team leader, Human Resources representative, another member of management or the Legal Department. If you prefer, you may also contact the Ombudsman (contact information is at the end of this Code of Conduct).

Rockwell Automation’s reputation for integrity depends on every one of us continuing to make and keep commitments to ethical conduct in all we do. Let’s keep up the good work.

Sincerely,

Blake Moret
President and Chief Executive Officer

ETHICS IS GOOD BUSINESS, AND INTEGRITY IS THE BOTTOM LINE
Our policy is to conduct business in accordance with all applicable laws and with the highest standards of ethics and integrity.

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In addition to this Code of Conduct, our Global Policies (available on our Policies and Procedures Web site (Global Rain A-Z), establish the rules and guidance we all follow in our work every day and everywhere we do business.
The Rockwell Automation Way
Our policy is to conduct business in accordance with all applicable laws and with the highest standards of business conduct.

Why It’s Our Way
We want to be respected for honesty and unquestioned integrity. Our continued business success depends on our customers and shareowners recognizing these qualities as Company hallmarks. Even a perception that we act unethically can damage our reputation.
Q: I do my job, and I follow the rules. Frankly, I think we’re all ethical employees. Why do we keep getting reminders to be ethical? Does someone think we’re not?
A: Not at all. But it is important to continuously remind ourselves just how critical it is to our success that all of us, from our CEO down, act in accordance with our policies and applicable laws. We are all under pressure to get the job done – in the face of those pressures, we must remember we will never cut corners, ignore company policies, or violate applicable laws. Be familiar with the policies and laws that apply to your job, and if you don’t know or are unsure, ask.

Q: Does this Code of Conduct apply to every Rockwell Automation employee worldwide?
A: Yes. Not only does it apply to all our employees but also to our Board of Directors. Every new hire receives training about this Code of Conduct, and every employee receives annual training. The requirements of this Code of Conduct cannot be waived for any employees or the Board of Directors. This Code of Conduct is available online both on the Company public website, as well as the Ethics and Compliance Center and Policies and Procedures sites on Global Rain. If you would like a hard copy, print it or ask your manager or Human Resources representative. The Code of Conduct is available in many languages.

Q: Are ethics, standards of business conduct and compliance U.S. concepts?
A: No. Every country has laws, and all of our employees are subject to company policies (including the Code of Conduct) everywhere we do business. It is part of our commitment as a company to know what laws, standards and policies apply to us and to live by them, and to uphold the highest ethical standards. Ethics, standards of business conduct and compliance are not about one country, but about how we run our business globally.

Q: I’d like to learn more about the subjects. Where do I turn for help?
A: Start with your manager. You can also refer to the Communication Network for your Business Segment, Region or Function. If your question is about a law, you can contact the Legal Department (please refer to the Legal Department or Ethics and Compliance sites on Global Rain). And, of course, you can contact the Ombudsman.

Q: What does the term “standards of business conduct” mean? What do these standards of business conduct cover?
A: Standards of business conduct is the term we use to describe the way we are all expected to do business. It is both the concepts of ethics and compliance with applicable laws and our policies. This Code of Conduct and our Global Policies (accessible at the Policies and Procedures site on Global Rain) detail what the term means; for example, that we will not falsify Company documents and records, make bribes, or violate environmental laws. It also means that we will deal with customers, suppliers, and others fairly and honestly.
The Rockwell Automation Way
If you have knowledge of any activity that is or might be a violation of our standards of business conduct, you must report that activity promptly to your manager, management, Human Resources representative, the Legal Department or the Ombudsman. Our policy prohibits the harassment of, or retaliation against, an employee for making a disclosure. Deliberately making a false report is also prohibited.

Why It’s Our Way
We must conduct all business activities in a way that is consistent with our standards of business conduct. Unethical behavior is wrong and can damage our reputation. In our transparent and digitally-connected world, information about bad acts often becomes public instantly and will be learned by customers, regulators and others. We urge you to seek answers or clarification if there is any doubt or “gray” areas. Unfortunately, rules are sometimes broken. We must know about these violations so prompt and appropriate action may be taken. To help assure that our standards of business conduct are enforced, we all need to understand and accept our obligation to report violations and know that it can be done in confidence and without fear of retaliation.

You can make a report to the Ombudsman (anonymously if you want) by toll-free phone, fax, regular mail, email or the web-based Ombudsman Alertline. If you have knowledge of any activity that is or might be a violation of our standards of business conduct, you must report that activity promptly to your manager, another member of management, Human Resources representative, the Legal Department or the Ombudsman.
Q: I know of a violation of Company policy related to standards of business conduct. Do I have to contact the Ombudsman?
A: You are required to disclose the violation as soon as possible to an appropriate authority – your manager or other member of management, Human Resources representative, the Legal Department or, if you prefer, the Ombudsman.

Q: If I identify myself when I contact the Ombudsman, who will be told that I did so?
A: The Ombudsman’s office is very serious about protecting confidentiality. You do not need to give your name. If you give your name but tell the Ombudsman that you want your name held in confidence, the Ombudsman will do so to the greatest extent possible.

Q: What can I do if I think someone is retaliating against me for reporting a matter to management, Human Resources representative, the Legal Department or the Ombudsman?
A: Report it to the Ombudsman immediately. Retaliation is a violation of our policy, and appropriate action will be taken to stop the retaliation and prevent future occurrences.

Q: I contacted the Ombudsman to report an incident. The person I contacted the Ombudsman about is still working here. Why wasn’t I told what happened?
A: When the investigation resulting from a report to the Ombudsman is completed, appropriate corrective action is taken. If you want to be informed of the results of an investigation, you should make your desire known when you report the matter. Please be aware, however, that the specifics of employee discipline are often required to be kept confidential.
The Rockwell Automation Way

We will not tolerate discrimination, harassment, or physical or verbal threats, all of which deny employees the opportunity to contribute to the best of their abilities and deprive our Company of their full talents. This is detailed in our People Policy.

Why It’s Our Way

Integrating the unique attributes and talents of a diverse workforce allows for greater flexibility and creativity in our workplace and community. Preventing harassment, discrimination and threats is a matter of respecting each other’s rights and dignity, which is a basic value for us. You are entitled to conduct their business in a work environment free of these distractions.

Preventing harassment, discrimination and threats is a matter of respecting each other’s rights and dignity, which is a basic value at Rockwell Automation.
Q: What is sexual harassment?
A: Sexual harassment involves unwelcome sexual advances, requests for sexual favors, or physical conduct of a sexual nature. It can also involve other conduct of a sexual nature, including verbal conduct, which creates a hostile or offensive working environment.

Q: I overheard a manager say he would not promote a particular individual because the person is a different race. He also used a racial slur about that person. What should I do?
A: Take immediate action. Discrimination is not right, is against our policy, and is illegal. Race must never be a factor in making a personnel decision. Contact the manager’s manager, your Human Resources representative or the Ombudsman to report his comments.

Q: I have a disability. Am I entitled to accommodations to enable me to perform my job?
A: It is our policy to make reasonable accommodation for employees with disabilities. You and your manager should ask your Human Resources representative and/or Facilities to discuss appropriate accommodations.

Q: One of my coworkers has a temper and often uses threatening and abusive language with others. I’m concerned about working near him, and I don’t know what to do about it.
A: Report your observations and concerns to your manager, Human Resources representative, or the Ombudsman.

Q: A recently terminated employee has been in the parking lot several times telling former coworkers of his intent to “get even” for being terminated. Should I do something?
A: Yes! The situation could be an indication of potential violent behavior and you should report it to your manager, Security, Human Resources representative or the Ombudsman immediately.

Preventing harassment, discrimination and threats is a matter of respecting each other’s rights and dignity, which is a basic value at Rockwell Automation.
The Rockwell Automation Way

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. We are all required to report any potential conflict of interest so that the conflict can be managed or avoided.

There are many kinds of relationships you have with other people that can create a conflict; it is impossible to describe them all. The most common types of conflicts are presented by relationships that are financial or personal (such as a relative or good friend). Not all of these relationships will cause a conflict of interest. However, if you have any doubt about whether you have a conflict, you must report it.

A conflict of interest can arise when another relationship may cause, or tempt, you to act against the interests of Rockwell Automation and instead in favor of the outside relationship. It is important to understand that the problem is not just having the relationship, but how the relationship could affect your judgment, or whether the relationship could cause you to act in a way that is disadvantageous to the Company. At one extreme, an employee may have ownership in a company that does business with Rockwell Automation and may influence Rockwell Automation to sell or buy from his or her company at an unreasonable price. In this example, the conflict rises to the level of fraud and is certainly grounds for termination.

The only way you can clear a conflict, or sometimes confirm if a conflict really exists, is to report the relationship to your manager or local HR representative. The relationship can then be reviewed to determine if a conflict really exists, and to the extent a conflict does exist, whether it can be managed. It is always better to report an actual or perceived conflict if you are in doubt – because failure to report a relationship that is ultimately discovered and found to pose a conflict can lead to disciplinary action up to and including termination.
Why It’s Our Way

We have an obligation to our customers, suppliers and shareowners to ensure that business decisions are based on quality, price, delivery, and supplier experience and reputation. Business decisions must not be influenced by personal considerations or interests.

A conflict of interest can harm our integrity or even the quality of our products or services. For this reason, you may not be directly or indirectly involved in any business that competes with Rockwell Automation or does business with Rockwell Automation. This prohibition extends to people with whom you have a close personal relationship as well. The only way you may continue your employment at Rockwell Automation if such a relationship exists is by disclosing the relationship to your manager, and then following the Rockwell Automation Conflict of Interest Disclosure process found on the Ethics and Compliance Center site, including completion of the Conflict of Interest Disclosure Form.

Q: What kinds of relationships can cause a conflict?
A: Generally speaking, a relationship that could affect your impartiality or judgment is one that can cause a conflict. We usually divide these relationships between financial and personal relationships.

Q: What kinds of financial relationships can cause a conflict of interest?
A: Financial relationships that might cause a conflict are those such as being a shareholder, director or other financial beneficiary in one of our suppliers, customers, or even competitors. The risk in such relationships is that you may act in a way that financially benefits your other interest at the expense of Rockwell Automation. For example, if you have a financial interest in a company that supplies components to Rockwell Automation – it would benefit you if you could ensure that Rockwell Automation selected the company in which you have a financial interest over other competitors, even if "your" company did not supply the best components.

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, particularly in a publicly traded company, is unlikely to pose a problem; but if you are one of only two shareholders then you are more likely to benefit directly from any decision made in favor of “your” company. Also, your role within Rockwell Automation will play a part – with the example above of an employee having a financial interest in a supplier of components to Rockwell Automation, that employee may only have a conflict if that employee is able to influence Rockwell Automation’s decision to select those components.

Depending on what your position is at Rockwell Automation and the type of work you do or manage, there may be other kinds of business or financial relationships that can create a conflict. If you have any doubt, you should seek the guidance of your manager or your local HR representative.
Q: What kinds of personal relationships can cause a conflict of interest?
A: A personal relationship will usually only cause a conflict if it is the kind of close personal relationship where you could put the relative or friend’s interests before Rockwell Automation’s interests.

The most common close personal relationships that can influence your judgment are spouses or domestic partners, children (including stepchildren and grandchildren), parents (including step-parents and grandparents), siblings and in-laws. Extended family relationships, such as aunts or uncles or long-time, close family friends can also pose a potential conflict, as can dating relationships or boyfriend/girlfriend relationships or even close personal friends or housemates. Remember, it is not the type of relationship that can be the problem, but whether the relationship could cause you to put the interests of the relative or friend before your obligations to Rockwell Automation.

In some cultures, family members are expected to put the interests of their family and close friends before all other concerns. In these situations, it may be almost inconceivable to prefer an employer’s interests over the family. If you feel that you have a relative or friend who is forcing you, or for whom you feel obliged, to put their interests before Rockwell Automation’s, you should seek the assistance of your manager or your local HR representative.

Q: Why do close personal relationships pose a potential problem in business situations?
A: In short, your judgment, or loyalty to the Company, could be compromised because of that relationship. As a Rockwell Automation employee, you must put the Company’s interests first. If you engage a friend or family member as a contractor, or as an employee that you supervise, it may be difficult to balance your personal relationship, with your duties and responsibilities to the Company.

Q: What is wrong with having a relative who works for a customer or supplier?
A: In most cases, nothing – but we need to know about it so appropriate action can be taken to protect potential conflicts from affecting, or appearing to affect, business decisions. For example, if your son works at a company that is one of our prospective or current suppliers, you should not be involved in any process to select, or review the performance of, this supplier as one of our suppliers. For this reason, you must report the relationship so that your manager can help you manage your job responsibilities without creating a conflict.

Note also that if it was your best friend who worked at the supplier, the same issues might arise – the concern is not with the type of the relationship but whether the relationship could cause you to act in a way that disadvantages Rockwell Automation.

Q: I have shares in a Rockwell Automation competitor. Is this a problem?
A: Remember that the answer to any question about whether you have a conflict of interest depends on whether, if at all, the relationship could cause you to act in a way that is disadvantageous to Rockwell Automation. So if you have a large shareholding in a competitor, but you hold your shares indirectly (for example, through a trust fund or a pension fund over which you have little control), then you are unlikely to be able to exercise any influence over the financial performance of the competitor; so you probably would not act in a way that would disadvantage Rockwell Automation. Even if you hold the shares directly, but the shareholding is small and the competitor is a listed company with a large public shareholding (such as ABB, Siemens, Emerson) then this is probably not a conflict. However, if you have a shareholding of 5% or more in the competitor, then you must report it because you could be motivated to improve the competitor’s profits above Rockwell Automation’s. You should also report it if a large amount of your personal wealth is held in shares in a competitor. If you do report this kind of potential conflict, we probably won’t ask you to sell your shares; but we need to know about it so that we can, for example, manage the information to which you have access while you work here.

Q: Can I supervise or hire someone with whom I have a close personal relationship?
A: No, not without prior approval of your manager, your HR representative and the Director of Global Compliance. Even though you may never show favoritism to your relative or friend, other people may assume that you do favor your relative or friend. This can create mistrust and suspicion in the working environment. For that reason, no employee should be in a direct reporting relationship with a relative or close friend without proper approval and oversight.
You must not be the final decision maker on whether a relative or friend is hired, what job assignments the relative or friend receives, what information is included in the relative or friend’s performance review and what compensation the relative or friend receives.

**Q:** But my relative or friend would never ask me to do something against Rockwell Automation’s interests. Do I have to disclose the relationship?

**A:** Yes. Sometimes the appearance of conflict can be as damaging as an actual conflict. Gossip or ignorance can be damaging, both to you and to the Company. The only way to protect yourself and Rockwell Automation is to report the relationship and get formal approval to continue as before.

**Q:** So what is a reportable conflict of interest?

**A:** You need to report a potential conflict of interest if you or someone with whom you have a close personal relationship has any direct or indirect interest in, renders any service to, or is otherwise involved with any of our competitors, suppliers or customers. You also need to report any conflict of interest, actual or potential, because of a close personal relationship you have with another person (for example, because of a promotion your best friend now reports to you). If you are unsure, report the relationship.

**Q:** When should I report a potential conflict?

**A:** As soon as you become aware that there might be a conflict.

**Q:** How do I report a potential conflict?

**A:** Visit the Conflict of Interest page on the Ethics and Compliance Center site or ask your manager or Human Resources representative for a disclosure form. You can also report a potential conflict of interest at the end of your annual ethics training, but do not wait until then to report a potential conflict – do it now!

**Q:** I am a programmer familiar with a software package developed by one of our suppliers. A problem has been discovered in the software that is adversely affecting productivity. The supplier has asked me to work for him on a short-term contract to find and correct the problem. May I accept the offer?

**A:** This is a potential conflict of interest that you must report, and you will need to obtain approval before you accept. In this instance, approval might be denied because you could now have an interest in the “fix” – and that might impact your evaluation of the software as a Rockwell Automation employee.

**Q:** My housemate owns a machine repair shop and believes her shop can provide better service, price, and repair time than our current supplier. Can she be put on our “bidders” list?

**A:** Yes, but you must disclose the relationship and relevant facts. If you are in a position to influence the selection process, it is unlikely that your housemate’s repair shop will be placed on the “bidders” list.

**Q:** I am a manager and I have just started dating a direct report. The relationship is totally consensual, so there’s no problem, is there?

**A:** Yes there is! You have a conflict of interest because you can no longer be objective in evaluating your direct report’s performance, be fair in giving out assignments, etc. – and even if you could still be objective, you cannot avoid the appearance of a conflict of interest. You must report your relationship immediately so that we have the opportunity to address the conflict appropriately.

**Q:** Can I do work for a Rockwell Automation customer on my own time? I just want to save the customer money and the customer would receive the same quality of service as if Rockwell Automation provided the service.

**A:** No. This is a direct conflict of interest. You are using your knowledge of our customer and that customer’s needs to create extra income for yourself. You may also be directly competing against us!
The Rockwell Automation Way
We are against corruption in all forms and all of us must take an active role in ensuring it is not part of our business activities. Our business environment includes both private (for profit) and public (governmental) enterprise and depends heavily on our service and supply network and our channel partners; our anti-corruption efforts apply to our full business environment. We believe business success for our Company and the companies with whom we work is grounded in delivering superior products and services and is never an outcome of corruptly enriching an individual decision maker.

Why It’s Our Way
We believe corruption undermines legitimate business activities, improperly depletes the resources of and harms citizens of governments, and damages trust in our political systems. Corrupt acts destroy reputations of companies and individuals. The discovery of corrupt acts results in job loss, substantial financial penalties, and increasingly, imprisonment. You must avoid even the appearance that business dealings have been influenced by your personal interests or convenience or the personal interest or convenience of others. Many of our customers and suppliers have joined our efforts to combat corruption and you must respect their policies on gift giving and hospitality. All of our government customers are subject to laws limiting gifts and hospitality and if you work with government customers, you must educate yourself on these laws (contact a member of the Legal Department for more information). Finally, many countries have laws that restrict gift giving and hospitality globally, in both the public and private sector. These restrictions apply to your actions and those who represent us in the marketplace (such as distributors or agents). You must understand these restrictions wherever you conduct business on behalf of Rockwell Automation. Further, you must ensure that those companies who assist you in furthering our business also understand these restrictions. It is never acceptable to look the other way.

We believe our business success and success for the companies with whom we work is grounded in delivering superior products and services and is never an outcome of corruptly enriching an individual decision maker.
Q: What is the Foreign Corrupt Practices Act (the “FCPA”)?
A: As a Rockwell Automation employee, you will hear frequent references to the FCPA. The FCPA is the US law that prohibits employees or representatives of a US corporation from giving anything of value, directly or indirectly, to an official of another country (or of a company that is owned by a foreign country, a so-called “state-owned” company) in order to obtain or retain business or influence an official act or decision. The FCPA restricts gift giving and hospitality wherever we do business. The US regulators have been very aggressive in pursuing, fining and imprisoning corrupt businesspeople. We must abide by the FCPA.

Q: What exactly is considered a “gift”? What exactly is considered “hospitality”?
A: A gift is something that you give to another person to use without further involvement by the gift giver and without direct impact on the business dealings between the gift giver and the recipient of the gift. Examples of a gift might be money, flowers, food baskets, pens, jewelry, tickets to a sporting event, a cruise or limousine ride, or a spa treatment. Gifts may also include securing admission for a customer’s child at a local or foreign university. The possible types of gifts are limited only by the imagination of the gift giver.

Hospitality involves paying for goods or services on behalf of another person in connection with the business relationship and often with continuous involvement of the person paying for the goods or service. A simple example of hospitality is the “business lunch” where one of our employees and a customer continue a business meeting over lunch – and where only one of the participants pays the bill. Paying for hotel or travel costs to enable a business meeting is another example of hospitality. Hospitality also includes supplying tickets to an event involving both our employees and a customer or supplier employees.

*We believe business success for our Company and the companies with whom we work is grounded in delivering superior products and services and is never an outcome of corruptly enriching and individual decision maker.*
Q: Does our policy require that I never accept a gift from a business contact or give a gift to a business contact?
A: No. The exchanging of modest gifts is often an expression of courtesy and not an attempt to influence a business decision. Around the globe, certain holidays are associated with the exchange of gifts as a sign of respect for another person. However, regulations and our policies prevent lavish gifts that go beyond an expression of courtesy or respect. To avoid corruption, many laws and policies define the value at which a gift becomes a means to corruptly influence a decision maker. We set specific values above which additional approval for giving and receiving gifts is required. You will find this information on the Policies and Procedures site. Some laws (such as the FCPA and the UK Bribery Act of 2010) require that the gift be reasonable. You must do your homework to know which rules apply with your customers or suppliers. Where the law requires reasonableness, talk to your manager. If you are unsure, seek advice from the Finance Department, the Legal Department or the Ombudsman.

Q: Can I give or accept hospitality?
A: Yes. Hospitality that is reasonable is generally understood to be part of business interactions and it is often more convenient to have one person pay the bill. Typically the host of the event covers the expenses of meals, refreshments, entertainment, transportation or lodging. As with gift giving, regulations and our policies prevent lavish hospitality that goes beyond the goal of facilitating a business meeting. To avoid corruption, many laws and policies define the value at which hospitality becomes a means to corruptly influence a decision maker. As an example, procurement officers of the US government are prohibited by law from accepting any hospitality. Some laws (such as the FCPA and the UK Bribery Act of 2010) limit the value of hospitality by mandating that the hospitality be reasonable. You must do your homework to know which rules apply with your customers or suppliers. Where the law requires reasonableness, talk to your manager. If you are unsure, seek advice from the Finance Department, the Legal Department or the Ombudsman.

Q: Are special approvals required when I give gifts or hospitality to employees of state-owned or state-controlled enterprises?
A: Special care should be taken in giving hospitality or gifts to employees of state-owned enterprises. First, you should consult with your manager or the Legal Department to determine the applicable legal restrictions on gifts or hospitality and the appropriateness of the hospitality or gifts under the circumstances. Second, managers should take particular care in approving requests for gifts and hospitality relating to employees of state-owned enterprises to avoid even an appearance of impropriety. Finally, be aware that the Finance Department will give special attention to expense reports including hospitality for employees of state-owned enterprises. If you are unsure whether a company is state owned, do your research or contact the Legal Department for advice.

Q: What should I do if I’m offered a gift that violates Rockwell Automation policy – such as a weekend vacation? Refusing it could embarrass the giver.
A: The easiest response is to explain that accepting the gift is a violation of our gift policy and accepting the gift will put your job at risk. Where the refusal of the gift may be interpreted as an insult because of local custom, the gift may be accepted, acknowledged, and promptly sent to the Senior Vice President, General Counsel & Secretary for disposition. Think ahead about any plan for accepting and then disposing of a gift. Some gifts cannot be “returned” – like a vacation. When this type of gift is offered, you will need to tell the giver in advance that accepting such a gift violates our policy.

Q: If I am invited to lunch or dinner while on a business trip to a supplier’s plant, may I accept?
A: You should consider the same issues when you accept hospitality as when you provide hospitality. Where it is logical that one person should be paying the bill at a shared meal, there is typically no issue accepting the offer of a lunch or dinner from a supplier. Ask about the location. Is the cost of the dinner sufficient to make you feel obligated to do something in return for the supplier? Get this information in advance to avoid embarrassment for both you and the supplier. If you are uncomfortable as the meal progresses, ask the waiter to split the bill and pay for your own meal. Note: Under most circumstances, we should pay your expenses associated with travel and lodging to visit a supplier.
Q: One of our distributors has offered to take care of getting certain government permits we need to sell certain products. At the same time, the distributor has requested a $40,000 price break to “help move the process along.” Because we really don’t know where the money is going, do we have to worry about it, or is that the distributor’s problem?

A: No, it is not just the distributor’s problem. We can be held responsible for our third-party agents’ actions (like those of our distributors). Words like “move the process along” and “expedite” are often indicators that a bureaucrat will be paid a bribe – either to prioritize certain work or to overlook errors in documentation. Such payments expose us and the distributor to criminal liability. We need to ensure that expediting payments are authorized by the relevant government agency and all such payments are made directly to the government agency. Involve your manager and a member of the Legal Department if you need assistance in uncovering the facts. Document the answers. If you learn that our distributor intended to pay a bribe on our behalf, report the incident to your manager, the Ombudsman or a member of the Legal Department.

Q: In some countries, cash has to change hands before government clerks will perform certain routine duties. Are such payments forbidden?

A: Yes, these payments violate local law and violate our policy. If you are solicited for a payment, explain that your Company policy prohibits making such payments. If you continue to have difficulty in dealing with an office of the government, contact the Legal Department for help. Notify your management that you are unable to timely transact business because you have refused to pay a bribe. We will always choose to delay a shipment rather than pay a bribe.

Q: What if a government employee (such as a policeman or immigration official) threatens to detain or harm me unless I give him cash?

A: If you feel your health or safety is at risk because of your refusal to pay money, you should make the payment. These types of payments are not bribes, they are extortion payments. As soon as you reach a place of safety, immediately report the payment to your manager and to the Ombudsman.

Q: Is it okay for us to appoint or retain distributors, consultants or agents to help us get an order?

A: Yes, we may use distributors, consultants or agents – if we follow our policy. Our engagement with channel partners is critical to our success. We frequently maintain long-term relationships with our selected distributors, consultants, and agents to represent us over an extended period of time. Because these channel partners represent us, we conduct due diligence and secure approval before entering an agreement with our channel partners. We conduct specific anti-corruption training of our distributors, consultants and agents and ask that they agree to comply with our Anti-Corruption Policy. On some occasions, a new potential agent brings us an opportunity. You should never ask the potential agent to discuss the opportunity until we have gathered sufficient information about the agent to be confident the agent is not passing on his fee as a bribe to the customer (or otherwise improperly influencing the buying decision). Please refer to the Anti-Corruption Policy to understand your requirements before agreeing to work with an agent or consultant or distributor.

Q: What should I do if my customer asks Rockwell Automation to contribute to a charity or an employee raffle?

A: Charitable contributions or raffle contributions can be another way to inappropriately influence a decision maker. If you think you may lose a sale if you decline to make a charitable contribution or donate a raffle prize, you are probably being asked to contribute inappropriately. You should involve your manager and consult with a member of the Legal Department for more advice. People and companies have been criminally prosecuted under the FCPA for giving charitable contributions in response to a request by a government customer.

Q: What should I do if a government customer asks Rockwell Automation to make a political contribution?

A: Tell the customer that we – as a company – do not make political contributions to individual candidates.
Accurate Books and Records

The Rockwell Automation Way
No false, misleading or artificial entries may be made our books and records. Records and books must be maintained in accordance with good accounting practice and all laws and regulations. All costs must be accurately and completely recorded in an auditable manner.

Why It’s Our Way
As a publicly held corporation, we have a responsibility to our shareowners, employees, customers and suppliers, and to the communities in which we live and work. There can be no compromise in the maintenance of our books and records. Our customers expect our products to be priced fairly and all charges to be applied accurately. Accurate books and records begin with each of us. Whether the records are timecards, expense reports, general accounting records, or purchasing or manufacturing records, each of us has a personal responsibility to ensure that every document is complete and accurate. For more information, please review our Internal Control Policy.
Accurate Books and Records

**Q: It is the last week in the quarterly reporting period. My boss wants to make sure we meet our numbers for the quarter, so he asked me to book a sale now that won’t be finalized until next week. I guess this won’t hurt anyone – should I do what he says?**

**A: No!** Costs and revenues must be recorded in the right time periods. The sale has not been completed until there is evidence of a sales agreement, title has passed, and the sales price can be determined and is reasonably collectible. Usually, revenue cannot be recognized until the product is delivered or the services are performed. Until then, it would be a misrepresentation to include it in an earlier period.

**Q: Must I have a receipt for all business expenses?**

**A: You should ask for a receipt for any business expense, and receipts are required for reimbursement for certain expenses. For more information, please see our Business Travel and Entertainment Policy.**

**Q: If I take a personal trip at the end of a business trip, what expenses may I claim?**

**A: We will reimburse you for only those expenses associated with your business trip in accordance with our Business Travel and Entertainment Policy. You will be responsible for all incremental costs such as transportation, lodging and meals.**

**Q: One of our auditors has asked me a question at a time when I am very busy. I am 80% sure of the answer but to be completely sure will take some additional research. If I give the auditor the answer without qualifying it I think she will be satisfied and move on, allowing me to get back to work. Can I just tell her what I think the answer is, or should I tell her what I think the answer is but that I am only 80% sure?**

**A: You must tell the auditor that you are only 80% sure of the answer and perform additional research if the auditor requires it.**

**Q: If I record the correct amount of an expense, does it matter how I describe the expense?**

**A: Yes.** It violates our policy and the Foreign Corrupt Practices Act to describe things inaccurately in our books and records. For example, do not describe customer entertainment expenses as “marketing expenses.”

**Q: May I give my computer password to my administrative assistant or coworker so they can log on to my account and help me with some work?**

**A: No.** New business processes will increasingly call for you to grant authorizations and approvals from your computer, and your signature authority can be compromised when you let someone else use your account. In addition, sharing your password with another person jeopardizes sensitive information.
Using Company Resources

The Rockwell Automation Way
We must all use Company resources, and the property and technology of customers, subcontractors and suppliers that has been entrusted to us, appropriately and in accordance with our Using Technology Resources Policy.

Why It’s Our Way
Our continued success depends on effective use of available resources.
Company resources, and the property and technology of customers, subcontractors and suppliers (e.g., technical data, patents, software and materials), may not be taken, used, altered or destroyed without authorization.
Using Company Resources

**Q:** May I use the Company computer after hours to work on college homework?

**A:** Yes, but do it in a way that complies with our Using Technology Resources Policy and other policies.

**Q:** I am an engineer and have developed some unique manufacturing systems software in connection with a Company research project I’m working on. The software is now being used throughout the Company. Because I developed the software, may I try to market it?

**A:** No. Because you developed the software as part of your work responsibilities, it is Company property and may not be sold or disclosed to others without appropriate management and Intellectual Property Department authorization.

**Q:** May I give my stockbroker or insurance agent a list of phone numbers of Rockwell Automation employees?

**A:** No. That information is for internal use and distribution only.

**Q:** Over the years, I have developed a file containing documents relevant to my job, including policies, procedures, organization charts, correspondence, briefing charts, product information, and customer and supplier contacts. Because I developed the file as my own reference data, may I take it with me if I leave the Company?

**A:** No. That data belongs to the Company. Because you developed it in connection with your job, it is not your personal property. For more information please refer to our Safeguarding Confidential Information Policy.

Company resources, and the property and technology of customers, subcontractors and suppliers (e.g., technical data, patents, software and materials), may not be taken, used, altered or destroyed without authorization.
The Rockwell Automation Way

Information that is not public, whether it is sensitive Company information, sensitive information received from a third party, government classified information, employee personally identifiable information (“PII”) or private health information (“PHI”), may not be disclosed except as authorized. Employees must be familiar with established policies and procedures that govern the protection of sensitive, proprietary, confidential and classified information. For more information on privacy and confidential information, please refer to our Safeguarding Confidential Information Policy. If you violate governing laws, both you and the Company could face substantial fines and imprisonment.

Why It’s Our Way

Through your work at Rockwell Automation, you may work on projects that involve information protected by export regulations, trade secret laws, copyright laws or the confidentiality agreements, or they may have access to PII or PHI. Most employees come into contact with information or processes that give us a competitive edge or involve matters of personal privacy. Unauthorized disclosure of Company-sensitive information, or unauthorized possession or use of someone else’s sensitive information, could compromise customer trust in our Company. It may also be a crime or violate data privacy laws.

Unauthorized disclosure of Company-sensitive information, or unauthorized possession or use of someone else’s sensitive information, could compromise customer trust in our Company.
Protecting Confidential Information

Q: A recruiter from another company called to inquire about the performance experience and work habits of a former employee who reported to me. What should I tell the recruiter?
A: Tell the caller that a written request must be directed to the Human Resources Department. The requested information is Company confidential and should only be disclosed through proper channels.

Q: A professional society has requested that I make a presentation at a seminar. I want to participate. What approvals do I need?
A: If the area of expertise to be addressed is non-technical, the presentation should be approved by your department management and Corporate Communications. If the presentation is technical, it should be reviewed by your department management, the Advanced Technology Department and the Legal Department. If it involves a classified government contract, it might also require government approval. If you get permission to give the presentation, stick to the approved material during your remarks and in response to questions after the presentation.

Q: Because of my expertise, I have been asked to be an expert witness in a litigation not involving the Company. May I do this?
A: Probably not. You must contact the Legal Department to discuss and obtain prior approval.

Q: I have decided to leave my employment with the Company. While I worked here, I developed and gave several presentations about projects I worked on. Is it okay for me to take those presentations with me when I leave?
A: No. All work you produce as an employee is property of the Company.

Q: During my employment with the Company I have invented technology that is not currently being used by the Company. If the Company is not interested in the technology, am I free to exploit it myself?
A: No. All work you produce as an employee is property of the Company, including any technology you invented. In appropriate instances we may permit employees to use technology we own. Each request is evaluated and requires the prior approval of the relevant business and the Legal Department.

Unauthorized disclosure of Company-sensitive information, or unauthorized possession or use of someone else’s sensitive information, could compromise customer trust in Rockwell Automation.
Protecting Confidential Information

Q: We are in competition with my former employer for a major contract award. A pricing system I developed when I worked for that company is still being used today. If I share the information I have with my new boss, we will have a clear advantage. Would this present a problem for me or our Company?

A: Yes! Your former company’s pricing system is probably considered proprietary by that company, and you have an obligation to your former employer not to disclose such information.

Q: A consultant has offered me information about a competitor’s bid on a customer project. Should I accept that information?

A: No. To do so could violate the law. Notify the Legal Department immediately.

Q: I occasionally need to share sensitive Company information with customers, suppliers, vendors and others who are not employees of the Company. What should I be doing to protect this sensitive Company information?

A: Determine whether there is a confidentiality agreement in place with the third party. The contracts group can assist you. In general, you should be familiar with our Safeguarding Confidential Information Policy. In particular, you should place an appropriate legend (for example, “Rockwell Automation Confidential”) on any sensitive Company documents. If you are sending Company Restricted Information over the internet, you should work with your manager and the IT Department to determine if it is prudent to encrypt the information.

Q: I have been given data by a supplier. Are there any special rules I have to follow to protect it?

A: In general, it is our policy to protect the data given to us by suppliers and customers to the same extent we protect our own. In addition, sometimes we will have a contract, Non-Disclosure Agreement (NDA), or other special legal obligation regarding others’ data. If you have any questions about the use and protection of data, ask your manager or the Legal Department.

Most employees come into contact with confidential information or processes that give us a competitive edge or involve matters of personal privacy.
The Rockwell Automation Way
Sharing, selling, giving, or otherwise transferring our products, services or technical data to another country or to citizens of another country must be in compliance with applicable laws of the countries involved in the transaction. Therefore, if you are involved in any of these activities, you need to be familiar with our Trade Policy.

Why It’s Our Way
It is our policy to abide by applicable governmental rules and regulations wherever we conduct business. Certain licenses or other government approvals may be required to “export” our products, services or technical data. U.S. export regulations control exports from the U.S. to other countries, sales to citizens of other countries in the U.S., and resale of certain products by our distributors. Employees involved in the export of technical data and products must understand and fully comply with governing rules and regulations.
Q: While I am in Paris for a technical meeting, I plan to contact several companies to discuss Rockwell Automation products and capabilities and to review with them the technical specifications and drawings. Do I need special approvals to have these discussions?

A: You should contact the Designated Contact for your location to determine if an export license or other government approvals are required to discuss the data.

Q: May I fax technical data to a business associate in another country? May I send it via the Internet? May I hand-carry technical data to another country?

A: It depends on the person, technical data and country. An export license may be required, even if the technical data is to be sent to one of our employees in another country. Further, export regulations prohibit exports to certain persons and/or countries on “prohibited” lists. Check with the Designated Contact for your location to determine specific export requirements.

Q: The laws covering the export of technical data only cover sending technical data out of the country, right?

A: Wrong! Providing certain technical data to a foreign citizen may be prohibited even if the data never leaves the country, and even if the foreign citizen is one of our employees working in the country where the data originates. Check with your Designated Contact.

Q: A prospective customer from another country will visit one of our U.S. plants next week for a briefing on our product and technical capabilities. She will not be given any copies of charts or other written technical data, so I assume there isn’t any potential export control issue. Am I correct?

A: No. If a particular technology transfer is subject to export controls, it does not matter whether the transfer occurs in the U.S. or in another country, nor does it matter whether the data is communicated verbally, visually, written or in other form.
The Rockwell Automation Way

We comply with all applicable competition laws (called antitrust laws in some countries) in conducting our global business. These laws prohibit competitors from restraining competition by, for example, agreeing to set prices, rig bids or divide customers. They also prohibit many other anti-competitive practices such as setting distributor resale prices or abusing a dominant market position. If you are an employee with authority to set prices, or if you participate in trade associations or are responsible for transacting business with competitors, suppliers or channel partners (including distributors), you should understand the competition laws that apply to you. Because these laws are quite complex and vary from country to country, you should consult with the Legal Department whenever you have questions about your obligations under the competition laws and before you enter discussions or agreements with a competitor, appoint or terminate a channel partner or change pricing practices or processes. For more information on competition laws and their impact on you and the Company, please refer to the resources on the Ethics and Compliance Center Site.

Why It’s Our Way

Competition laws promote fair and honest competition and protect suppliers and customers from anti-competitive practices. Violations of the competition laws can result in criminal or civil liability for the Company and the people involved in the violation. It is our policy and good business to compete fairly and obey the laws of every country where we do business.

To promote fair and honest competition, the competition laws prohibit anti-competitive behavior like price fixing or bid rigging by competitors and many other anti-competitive practices that injure competition.
Q: A Company distributor has requested a special price to meet a local competitive situation. I want to require the distributor to resell at a specific price to its customer as a condition of granting the special price. Can I do this?
A: No. Competition laws protect the right of the customer to negotiate the lowest price possible from a distributor. In some circumstances, competition laws may even protect the distributor’s right to charge a customer a price that is higher than the price we would charge. Although you may suggest a resale price to a distributor, our pricing policies prohibit you from setting a distributor’s resale price or preventing a distributor from selling below our suggested resale price because such arrangements can violate the competition laws. A distributor can decide to sell at our suggested resale price; however, it must be clear that the distributor is free to accept or reject our suggestion. You should not take or threaten to take adverse action against a distributor in an effort to force a distributor to sell at our suggested resale price. You should not even ask the distributor what the distributor’s margin is on the sale to avoid the appearance that you are trying to set prices. Consult the Legal Department before making any changes or exceptions to our pricing policies.

Q: A loyal systems integrator customer is bidding a government project. The government entity requires at least two bids for every project. The systems integrator asks us to act as the second bidder on the project and submit a high bid. Can we agree?
A: No. We should never agree to submit a “fake” bid on a project. Even though the systems integrator is our customer, we may also compete with the systems integrator in offering integrated solutions to common customers. The competition laws prohibit competitors from agreeing to bid or not to bid a particular opportunity. We should never discuss with competitors the contents of our bid or even whether we will bid a particular opportunity.

To promote fair and honest competition, the competition laws prohibit anti-competitive behavior like price fixing or bid rigging by competitors and many other anti-competitive practices that injure competition.
Q: We want to enter into a business transaction with one of our competitors such as a sourcing agreement for a brand label product or a teaming arrangement to bid a major systems contract. The discussions may involve the exchange of sensitive information like technical data and pricing. Would holding these discussions or sharing such information violate the competition laws?

A: Possibly, depending on the nature of the agreement proposed and the information exchanged with the competitor. Great care must be taken whenever you meet or exchange information with a competitor to avoid even the appearance of a competition law violation. Before you begin any discussions with a competitor regarding a proposed agreement, you must review the proposed relationship and the information you plan to exchange with a local member of the contracts group. He or she will involve the Legal Department as required to establish necessary ground rules for the discussion and protections on the flow of information.

Q: One of our U.S. businesses wants to enter into an exclusive contract under which the customer will agree to buy only our products for a period of one year. Is this legal?

A: Exclusive purchase or supply agreements can benefit competition and often are permitted by applicable competition laws. However, the answer to the question above is very fact-specific and there can be situations where an exclusive arrangement may be illegal. Consult with the Legal Department before you enter any agreement that requires one of the parties to the contract to deal exclusively with the other.

Q: After a trade association meeting, representatives of several competing companies often get together to socialize. If one of the representatives asks the others to review her company’s pricing policies, is there any problem?

A: Yes. Before participating in any trade association meeting, make sure you understand what subjects are and are not appropriate for discussion and consider avoiding social activities at these events entirely. 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). 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. If a competitor raises an improper subject in your presence, you need to state that it is against our policy to discuss the subject with competitors and immediately leave the room. You also should promptly report any such incident to the Legal Department. If you are a member of a trade association, standard setting association or similar organization that has members who are our competitors, you need to understand the competition laws that may apply.

Q: One of the distributors in my country has asked for standard prices that are lower than our standard prices to other distributors in my country. Can I do this or is this illegal price discrimination?

A: In some countries (e.g., United States), under some circumstances, it can be illegal to sell the same goods at different prices to different competing resellers. In general, you can offer a distributor a special price to meet a competitive situation at a specific customer. However, you should consult the Legal Department before you agree to sell the same products at different standard prices to distributors in the same country.
The Rockwell Automation Way

Because we are a publicly-traded company, the securities laws impose certain restrictions and limitations on trading in our securities. In order to protect the investing public, the securities laws make it illegal for those with “inside information” to buy or sell our securities or disclose inside information to others who may trade in our securities. To promote compliance with the securities laws, our policy is to prohibit trading in our securities on the basis of inside information relating to our Company. We also prohibit trading in securities of another company if you become aware of any material nonpublic information relating to any other company in the course of your employment with us. These prohibitions apply to all personnel at every level, as well as your spouse, children, and relatives who share your home and certain related entities.

“Inside information” is information that is both material and nonpublic. Generally, information is nonpublic if it has not yet been made available to the general public by press release or otherwise, and is material if a reasonable investor would likely consider it important in deciding whether to buy, sell or hold our stock. Some examples of information that typically would be considered material include earnings information, a pending merger, acquisition or divestiture, a change in dividend policy, bank borrowings, changes in senior management, new developments in products or services, pending or threatened significant litigation and gain or loss of a significant customer or supplier.
Insider Trading

This policy applies to transactions in Rockwell Automation securities including our common stock, stock options, and certain transactions under benefit plans. For example, the trading restrictions apply to elections you may make under the savings plans to increase or decrease the percentage of your periodic contributions that will be allocated to our stock and intra-plan transfers of an existing account balance into or out of the Rockwell Automation stock fund. This policy, however, does not apply to regular purchases of stock resulting from your periodic contributions to the savings plans pursuant to your payroll deduction election and transactions pursuant to a Rule 10b5-1 trading plan that meets the requirements of Rule 10b5-1 and our Rule 10b5-1 plan policy.

You are prohibited from disclosing any material nonpublic information concerning us or other companies with which we do or may do business to anyone, except those who have a clear need to know, with any disclosures limited to only that information they need to know. Please refer to our Communications and Social Media Policy for further guidance on our policies regarding confidential information.

Hedging Transactions: Certain types of 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. These transactions allow the holder to continue to own the covered securities, but without the full risks and rewards of ownership. When you engage in these types of transactions, your interests are no longer aligned with shareowners. These types of transactions can also create the appearance of impropriety if there is unusual activity in a company’s stock or stock price. 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.

Pledging: 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.
Why It’s Our Way

It is our policy and good business to obey the laws of every country where we do business. And it’s not fair to trade using internal information not known to other investors.

In order to protect the investing public, securities laws make it illegal for those with “inside information” to buy or sell securities (stocks, bonds, options, etc.).

Q: I just learned that we are going to acquire another company, and I think that it will really help our future financial performance. Can I immediately buy more shares of our stock through my savings plan?

A: No! You would be trading in our stock based on “inside information” and would violate U.S. securities laws. You must wait we publicly announce the acquisition before you can trade in its stock.

Q: I just learned that we have decided, after a long study of competing products, to purchase a software product from a software supplier. If we think it’s the best software product, I bet other companies will, too. My brother likes to invest in hi-tech companies. Can I tell him about our decision to purchase the software so he can decide if he wants to invest in that software company?

A: Absolutely not! The information you have about our decision to buy the software from this company is confidential inside information. If you tell your brother, you are violating our policy against divulging confidential proprietary information and may also be violating securities laws.

Anyone who violates the insider trading prohibitions of the securities laws may be subject to serious civil and criminal liabilities and sanctions, including civil penalties of up to three times the profit gained or loss avoided, as well as disciplinary action up to and including termination.

We have established additional procedures that apply to 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 Insider Trading – Preclearance and Trading Window Procedures. You will be notified if you are subject to these additional procedures.

*In order to protect the investing public, securities laws make it illegal for those with “inside information” to buy or sell securities (stocks, bonds, options, etc.).*
The Rockwell Automation Way

We seek to reduce, minimize or eliminate waste and the release of potentially hazardous materials into the environment. We also seek, in general, to prevent adverse impact on the health and safety of our employees and communities as a result of our operations; and to recognize and respond to community concerns. We want to create a corporate culture in which environmental and safety concerns are recognized as priority considerations in all our decisions. All of our operations must comply with governing environmental and safety laws and regulations.

Why It’s Our Way

Failure to conduct operations properly can have serious and damaging consequences for our employees, neighborhoods, customers and shareowners. We owe it to ourselves and our coworkers to avoid injuries and follow safety rules and regulations. Similarly, the potential risk of even minimal exposure to various substances has focused public attention on environmental issues. Following waste disposal procedures and other safe environmental practices is required by our policies and applicable laws, but it is also the right thing to do for our neighbors. We have pledged to assure that our Company, employees and communities are not exposed to environmental and safety risks.

We want to create a corporate culture in which environmental concerns are recognized as priority considerations in all our decisions.
Q: I saw a coworker driving a forklift truck without wearing her seat belt, after my manager told me that seat belts must be used at all times. What should I do?
A: If you are comfortable talking directly to your coworker to remind her that seat belts are required, do it. Otherwise, tell your manager, your Environmental Health and Safety (EHS) contact or the Ombudsman.

Q: A permit to store a hazardous substance has expired. We know that the permitting agency will give us a new permit, but we want to wait until we move to another facility next month. May we wait to obtain the storage permit?
A: No. Although this situation might be viewed as only a “technical” violation, you must obtain a permit immediately.

Q: Environmental law is complex and changes frequently, and the penalties for violations are high. How am I supposed to know what laws and regulations apply to me?
A: Each location or plant has employees who ensure compliance with environmental laws and regulations, and who know where to obtain clarification of unusual situations. If you are unsure of what laws or regulations might apply in a given situation, discuss your concern with your manager, Environmental Coordinator, the Environmental, Health and Safety Department, or the Legal Department.

Q: Two scientists are 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 are spilled onto the floor and flow into the floor drain. Neither scientist is injured. What should be done?
A: If you become aware of a hazardous material spill, you must immediately report the incident to the facility emergency organization. Certain hazardous material spills must be reported to environmental agencies. Concealing a spill violates policy and may violate the law.

Rockwell Automation wants to create a corporate culture in which environmental concerns are recognized as priority considerations in all our decisions.
How to Contact the Ombudsman

Phone (U.S.): 1-800-552-3589 or 1-414-382-8484
External Alertline: https://rockwellautomationombudsman.alertline.com
External Mail: Rockwell Automation Ombudsman
1201 South Second Street, Milwaukee, Wisconsin
53204-2410 U.S.A.
Internal Mail: Ombudsman, Building 16, 7A18
Fax: 1-414-382-8485
Email: ombudsman@ra.rockwell.com
Intranet: From Global Rain (A-Z) visit the Ombudsman site

Australia: 0011 80074000074  Mexico: 001-800-552-3589
Belgium: 00 80074000074  Netherlands: 00 80074000074
Brazil: 00817-552-3589  New Zealand: 00 80074000074
Canada: 1 800-552-3589  People’s Republic of China: 00 80074000074
Denmark: 00 80074000074  Philippines: 00 80074000074
France: 00 80074000074  Poland: 00 80074000074
Germany: 00 80074000074  Singapore: 001 80074000074
Hong Kong: 00 80074000074  South Africa: 00 80074000074
Hungary: 00 80074000074  South Korea: 001 80074000074
India: 000-800-100-3308  Switzerland: 00 80074000074
Italy: 00 80074000074  Thailand: 001 800 74000074
Japan (carrier 20096): 0061 80074000074  Taiwan: 00801-149799
Japan (carrier 20115): 0041 80074000074  United Kingdom: 00 80074000074
Japan (carrier 20211): 0033 80074000074
Japan (carrier 20094): 001 80074000074
Malaysia: 00 80074000074

Business Standards Compliance Committee, care of the Ombudsman
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