

ROCKWELL AUTOMATION SUPPLIER CODE OF CONDUCT

- Rockwell Automation believes in: (i) conducting business with honesty and integrity and in accordance with all laws and regulations; (ii) worker safety; and, (iii) environmental and social responsibility. Therefore, all Rockwell Automation suppliers must abide by the standards set forth in this Supplier Code of Conduct.
 - The Code is made up of the following five sections: Labor; Health and Safety; the Environment; Business Ethics; and, Management System.
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LABOR

All suppliers must meet the following minimum recognized labor standards and uphold the human rights of workers, treating them with dignity and respect as understood by the international community. This applies to all workers including temporary, migrant, student, contract, and direct employees.

- **Freely Chosen Employment.** You must not use forced, bonded (including debt bondage) or indentured labor, involuntary prison labor, or slave labor. You also must not engage in human trafficking, including transporting, harboring, recruiting, transferring or receiving vulnerable persons by means of threat, force, coercion, abduction or fraud for the purpose of exploitation. All work must be voluntary and workers shall be free to leave work at any time or terminate their employment. Workers must not be required to surrender any government-issued identification, passports, or work permits as a condition of employment. All fees charged to workers must be disclosed and must not be excessive.
- **Child Labor Avoidance.** You must not use child labor in any stage of manufacturing. The term “child” refers to any person under the age of 15 (or 14 where the law of the country permits), or under the age for completing compulsory education, or under the minimum age for employment in the country, whichever is the most proscriptive. We support legitimate workplace apprenticeship programs that comply with all applicable laws and regulations. Workers under the age of 18 shall not perform work that is likely to jeopardize their health or safety.
- **Working Hours.** Work weeks must not exceed the maximum set by local law. Further, except in emergency or unusual situations, a workweek must not be more than 60 hours per week and workers must be allowed at least one day off per seven-day week.

- **Wages and Benefits.** Compensation paid to workers must comply with all applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits. In compliance with local laws, you must compensate workers for overtime at pay rates greater than regular hourly rates. You must not deduct wages as a disciplinary measure. You must supply workers with basic wage information in a timely manner via pay stub or similar documentation.
- **Humane Treatment.** There must be no harsh and inhumane treatment including any sexual harassment, sexual abuse, corporal punishment, mental or physical coercion or verbal abuse of workers; nor is there to be the threat of any such treatment. Disciplinary policies and procedures in support of these requirements must be clearly defined and communicated to workers.
- **Non-Discrimination.** You must not unlawfully harass or discriminate against workers. You must not discriminate based on race, color, age, gender, sexual orientation, ethnicity, disability, pregnancy, religion, political affiliation, union membership or marital status in hiring and employment practices such as promotions, rewards, and access to training. In addition, you must not use medical tests to unlawfully discriminate against workers or potential workers.
- **Freedom of Association.** We believe that open communication and direct engagement between workers and management are the most effective ways to resolve workplace and compensation issues. You must respect the rights of workers to associate freely, join or not join labor unions, seek representation, and join workers' councils in accordance with local laws. You must permit workers to openly communicate and share grievances with management regarding working conditions and management practices without fear of reprisal, intimidation or harassment.

HEALTH and SAFETY

All Rockwell Automation suppliers must provide a safe and healthy work environment for workers and, at a minimum, satisfy the following standards:

- **Occupational Safety.** You must control worker exposure to potential safety hazards (e.g., electrical and other energy sources, fire, vehicles, and fall hazards) through proper design, engineering and administrative controls, preventative maintenance, safe work procedures (including lockout/tag-out), and ongoing safety training. You must provide workers with appropriate, well-maintained, personal protective equipment when hazards cannot otherwise adequately be controlled by these other means. You must not discipline workers for raising safety concerns.
- **Emergency Preparedness.** You must identify and assess potential emergency situations and events, and minimize their impact by implementing emergency plans and response procedures including: emergency reporting, worker notification and evacuation procedures, worker training and drills, appropriate fire detection and suppression equipment, adequate exit facilities and recovery plans.

- **Occupational Injury and Illness.** You must put in place procedures and systems to prevent, manage, track and report occupational injury and illness, including provisions to: encourage worker reporting; classify and record injury and illness cases; provide necessary medical treatment; investigate cases and implement corrective actions to eliminate their causes; and facilitate return of workers to work.
 - **Industrial Hygiene.** You must identify, evaluate and control worker exposure to chemical, biological and physical agents and use engineering or administrative controls to control overexposures. When hazards cannot be adequately controlled by such means, you must protect worker health by appropriate personal protective equipment programs.
 - **Physically Demanding Work.** You must identify, evaluate and control worker exposure to the hazards of physically demanding tasks, including manual material handling and heavy or repetitive lifting, prolonged standing and highly repetitive or forceful assembly tasks.
 - **Machine Safeguarding.** You must evaluate production and other machinery for safety hazards. You must provide and properly maintain physical guards, interlocks and barriers when machinery presents an injury hazard to workers.
 - **Sanitation, Food, and Housing.** You must provide workers with ready access to clean toilet facilities, potable water and sanitary food preparation, storage, and eating facilities. Worker dormitories provided by you or a labor agent are to be maintained to be clean and safe, and provided with appropriate emergency egress, hot water for bathing and showering, adequate heat and ventilation, and reasonable personal space along with reasonable entry and exit privileges.
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ENVIRONMENTAL

In manufacturing operations, you must minimize adverse effects on the community, environment and natural resources while safeguarding the health and safety of the public. Suppliers must meet the following environmental standards:

- **Environmental Permits and Reporting.** You must obtain, maintain and keep current all required environmental permits (e.g. discharge monitoring), approvals and registrations and follow their operational and reporting requirements.
- **Pollution Prevention and Resource Reduction.** You must reduce or eliminate waste of all types, including water and energy, at the source or by practices such as modifying production, maintenance and facility processes, materials substitution, conservation, recycling and re-using materials.
- **Hazardous Substances.** You must identify and manage chemicals and other materials posing a hazard if released to the environment to ensure their safe handling, movement, storage, use, recycling or reuse and disposal.

- **Wastewater and Solid Waste.** You must characterize, monitor, control and treat wastewater and solid waste generated from operations, industrial processes and sanitation facilities as required prior to discharge or disposal.
 - **Air Emissions.** You must characterize, monitor, control and treat air emissions of volatile organic chemicals, aerosols, corrosives, particulates, ozone depleting chemicals and combustion by-products generated from operations as required prior to discharge.
 - **Product Content Restrictions.** You must adhere to all applicable laws, regulations and customer requirements regarding prohibition or restriction of specific substances, including labeling for recycling and disposal.
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ETHICS

All Rockwell Automation suppliers and their agents must follow the highest standards of ethics including:

- **Business Integrity.** You must maintain the highest standards of integrity in all business interactions. All of your business dealings should be transparently performed and you must accurately reflect them in your books and records.
- **No Improper Advantage.** You must not offer or accept bribes or other means of obtaining undue or improper advantage. You must implement monitoring and enforcement procedures to ensure compliance with applicable anti-corruption laws.
- **Disclosure of Information.** You must disclose information regarding business activities, structure, financial situation and performance in accordance with applicable regulations and prevailing industry practices. Falsification of records or misrepresentation of conditions or practices in the supply chain is prohibited.
- **Intellectual Property.** You must respect intellectual property rights; you must transfer technology and know-how in a manner that protects intellectual property rights.
- **Fair Business, Advertising and Competition.** You must uphold standards of fair business, advertising and competition.
- **Safeguarding Our Information.** You must use appropriate means to safeguard our information.
- **Responsible Sourcing.** You must not incorporate materials, parts or services in materials, parts or services supplied to Rockwell Automation that would violate any law or regulation because of the origin of the material, part or service. You must have a policy to reasonably assure that the tantalum, tin, tungsten and gold in the products you manufacture do not directly or indirectly finance or benefit armed groups that are perpetrators of serious human rights abuses in the Democratic Republic of the Congo or an adjoining country. You must exercise due diligence on the source and chain of custody of these minerals and make their due diligence measures available to customers upon customer request.

- **Privacy.** You must have reasonable safeguards to prevent exposure of the personal information of everyone you do business with, including other suppliers, customers, consumers and employees. You must also comply with privacy and information security laws and regulatory requirements when you collect, store, process, transmit, and share personal information.
- **Programs that Enable Reporting of Concerns.** You must have a program that enables workers to report violations of the law or the policies set forth in this supplier code of conduct.
- **Non-Retaliation.** You must have and have communicated to workers a process for them to raise any concerns without fear of retaliation.

MANAGEMENT SYSTEM

You must adopt or establish a management system designed to ensure that you:

- Comply with applicable laws, regulations and customer requirements related to your operations and products.
- Comply with applicable Customs-Trade Partnership Against Terrorism (C-TPAT) processes which will allow for the efficient and secure flow of imported and exported materials while protecting against the introduction of terrorists and weapons of mass destruction. C-TPAT procedures and best practices can be located at www.cbp.gov.
- Conform to this supplier code of conduct.
- Identify and mitigate operational risks related to this supplier code of conduct.
- That all of the suppliers you use in connection with providing goods or services to Rockwell Automation also adhere to the standards set forth in this supplier code of conduct, including an audit process to verify such compliance.