

Global Policy Trade

We will follow all applicable import, export, and sanctions laws and regulations.

WHO IS THIS POLICY FOR?

All Employees performing work for or on behalf of Rockwell Automation, and especially those who have a role in developing, marketing, selling, delivering, shipping, or receiving products.

Key Policy Principles

- The Global Trade Compliance team helps to administer and direct our global trade program (the importing and exporting of products, parts, materials, software, and technology), however all **Employees** are responsible for understanding and following the rules that apply to them.
- Each country has rules that govern the exporting and importing of products and technology from that country, and in some cases in-country transfers, that must be understood and followed by all relevant and involved Employees. These rules can apply even when we are sending technology electronically.
- Some countries have rules that prohibit anyone from agreeing to participate in a boycott of another country in any way, including refusing to do business with that country or source products or services from that country.
- This policy supports our [Code of Conduct](#), and includes links to other trade compliance resources.

Global Trade Generally

- The rules that govern global shipments of products and transferring technology are complex. The **Company** has processes, procedures, and specific groups that are responsible for properly classifying, shipping, exporting, and importing.
 - All Employees are required to follow the Company processes and procedures for shipping or transferring anything across an international border, including products, parts, materials, samples or other items, software, and technology.
- The Global Trade Compliance team is responsible for establishing and approving the Company policies and procedures involving global shipments and transfers.
- Only interact or correspond with government officials on behalf of the Company if you are authorized. If you are in doubt about your authority, please contact Global Trade Compliance.
- Third parties performing international trade-related activities on behalf of the Company must be monitored for compliance with Company and legal requirements.

Export Rules

- Governments across the world:
 - Want to know what products and technology are being shipped or transferred across their borders;
 - Want to know where the products and technology are being shipped or transferred to; and,
 - Have laws that prohibit shipping or transferring the products or technology to certain countries, locations, entities, or individuals. The rules are in place for a variety of reasons, including:
 - Generating trade-related statistics;
 - Controlling or preventing access to certain technology for security reasons; and,
 - Promoting economic and foreign policy objectives.
- Failure to comply with export rules can have severe legal and financial consequences for you and for the Company.
- To comply with the export rules, we have established processes for classifying the products that we ship, and screening the customers and locations that we are shipping and selling to.
 - If you need or want to ship products, parts, samples, software, or transfer technology to another country, you need to know the rules and follow the established processes.
 - The rules apply even if you are shipping something as simple as a shirt to another country.
- There are laws that govern the sharing (providing access to through a server, shared drive or via e-mail) or export of **Controlled Products**, **Controlled Technology** and **Controlled Services** within your country with those who are not citizens of your country.
 - For example, in the United States, if certain technology is deemed controlled by the United States government for military or other strategic reasons, it may be a violation of law to show or send that technology to citizens of other countries, even if they are in the office next door to you or you are sending it by email.
 - If you are unsure about the rules, you should consult:
 - The Global Trade Compliance team;
 - Your Region Compliance Manager or Designated Contact (a list is available on the [Global Trade Compliance Website](#)); or,
 - Your region legal counsel.
- You should be aware of those countries that we are prohibited from doing business with because they are sanctioned or embargoed. Country guidance documents are available on the [Global Trade Compliance website](#). While we do have processes in place to prevent shipments to those locations, simply sending technical information or providing customer support may violate the rules.
- Your Operating Segment, Region, Organization, or Function may have additional rules or processes that you must be aware of and follow related to importing, exporting, or transferring technical data.

Import Rules

- Governments across the world want to know what products and technology are being imported across their borders. Like the rules for export, governments want to know what is being imported for trade statistics and security purposes. Governments also want to know how the import is valued for duty (revenue) purposes.
 - We have established processes to follow all applicable customs regulations, including providing accurate documentation, country of origin markings, classification of goods, and proper valuation declarations, including those of minimal or no charge value (such as tooling, components, samples, marketing merchandise, etc.). You must be familiar with the rules and established processes and follow those processes as they relate to your role.
 - The Global Trade Compliance team must approve participation in any Special Program (e.g., CTPAT - Customs Trade Partnership Against Terrorism, AEO – Authorized Economic Operator, etc.) or duty reduction (Preferential) programs, such as free trade agreements (e.g., USMCA – United States-Mexico-Canada Agreement, EU – European Union Preferential Trade, ASEAN – Association of Southeast Asian Nations, Mercosur – Southern Common Market, etc.), bonded warehouses, temporary imports under bond, duty drawback, and free or foreign trade zones.
 - Routine correspondence with local customs authorities should be directed to your local Designated Contact. Any non-routine inquiry or communication should be directed to your Regional Compliance Manager and the Global Trade Compliance team.
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Anti-Boycott Rules

- As a U.S.-based company, we cannot cooperate with any boycott or other restrictive trade practice not authorized by the U.S. government.
- An “illegal boycott request” under U.S. law is any request from a third party to take any of the following described actions against countries friendly to the U.S., including but not limited to Israel:
 - Refusal to do business with or in Israel, or with other persons or entities that do business in or with Israel, or other countries friendly to the U.S.;
 - Furnishing information about business relationships with or in Israel;
 - Discriminating against someone based on race, religion, sex, or national origin; or,
 - Executing business documents such as contracts, letters of credit, warranties that contain illegal boycott requests (such as prohibiting Israeli product content, product delivery through Israel, Israeli business dealings, compliance with country boycott laws, etc.).
- To ensure compliance with reporting regulations, report all boycott requests to the Global Trade Compliance team.