

Rockwell Automation Conflict Minerals Program

Dodd-Frank Wall Street Reform & Consumer Protection Act – Sec. 1502

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**Rockwell
Automation**

Conflict Minerals

Dodd-Frank Wall Street Reform & Consumer Protection Act Sec. 1502

Problem

Funds from mining of certain minerals provide financial support to armed militant groups in the Democratic Republic of Congo (DRC) region resulting in extreme violence against women and children

Conflict Minerals are referred to as 3TG

Tin – solder, finishes on board-level components

Tantalum – board-level capacitors

Tungsten – capacitors and RF filters, small motors

Gold – connectors, electronic components

Goal

This US law aims to use the market power of downstream users of the minerals to limit financing of the conflict (Aug. 2012)

This is a Supply chain reporting requirement

NOT an environmental issue

NOT a mineral ban

NOT an embargo of the region



Conflict Minerals – What does it mean?

For Rockwell Automation to say they ***comply with the Conflict Mineral law (part of the Dodd-Frank Act – section 1502) means:***

Requiring publically traded companies to

Report efforts made to determine the source of 3TG in it's products

File an annual report with the Securities & Exchange Commission (SEC) under the Exchange Act

For Rockwell Automation to be successful in complying with the act, we need our suppliers to participate in collecting this necessary information



Rockwell Automation's Conflict Minerals Commitment

Rockwell Automation's Conflict Minerals Supply Chain Statement

- Rockwell Automation is committed to high ethical standards and social responsibility. This includes supporting the Dodd-Frank Wall Street Reform & Consumer Protection Act, as it relates to Conflict Minerals (Section 1502), designed to eliminate support of illegal and unethical actions in the Democratic Republic of Congo (DRC). While we do not purchase tin, tungsten, tantalum and gold directly, they may exist in the materials and components we buy.
- Rockwell Automation's goal is to comply with the Conflict Mineral law. In support of that goal, we are also working with our suppliers to responsibly purchase the materials and components we use in our products.
- We expect the same supply chain transparency and practices from our suppliers. Our suppliers are expected to investigate the source and chain of custody of conflict minerals in the products they provide to us, to disclose their information on due diligence to us on request, and to purchase minerals from responsible sources that do not contribute to human rights abuses in the DRC region. We will work with our suppliers on a case by case basis to meet these goals.
- We will rely on the Conflict Minerals Reporting Template for data collection and will support the Responsible Minerals Initiative.

RA has Conflict Mineral requirements in the Rockwell Automation's Direct Materials Agreements, Terms & Conditions and new contracts.

Rockwell Automation's Conflict Minerals Program Overview

- Communicate & train suppliers regarding Conflict Minerals
- Conduct an annual campaign of suppliers to understand the source of 3TG for supply chain transparency purposes
- Analyze data received from suppliers for completeness and reasonableness
- Assess the level of risk that the supply chain may finance armed groups in the DRC
- Conduct Due Diligence as appropriate
- Partner with RMI who manage auditing of smelters & refiners
- File annual SEC report (Form SD, Conflict Mineral Report)



Rockwell Automation's Conflict Minerals Program Details

Rockwell Automation is collecting supply-base Smelter of Origin information

- This is to determine if any 3TG in our products originated in the covered countries and support armed group activities
- RA is using the template managed by the Responsible Minerals Initiative (RMI)
- It is known as the Conflict Minerals Reporting Template (CMRT)
- Collecting and reporting is on a company-wide basis

As a member of the RMI, Rockwell Automation is relying on RMI to verify the Country of Origin and Mine of Origin for specific smelters

- RMI does this through third party audits and alignment with other organizations doing similar evaluations

It is preferred that all suppliers provide the most up-to-date CMRT

- If a supplier does not have 3TG in their products, the header, first 2 questions and questions A through I is all that is required

Details Continued...

Rockwell Automation understands collection of data will take some time to complete 100%

- Expectation is to see a year-over-year improvement in the % of information supplied

Rockwell Automation will work with our suppliers to consider options to meet our Conflict Minerals data collection, transparency and risk mitigation expectations on a case-by-case basis

- The first step required is for the supplier to take steps to understand their supply chain for the 3TG – basic suggestions on the next slides
- Rockwell Automation's Conflict Mineral Process indicates that if suppliers identify smelters that support armed group activity, and refuse to take action to change that relationship to a conflict free situation (either by changing their supply chain or driving their supplier to change their 3TG sources), it will result in risk mitigation actions, which could include suspending trade with that supplier

Tips on How to Start Your Own Program

1. Become familiar with the Act & public agencies that provide information regarding
2. Become familiar with the [OECD Guidance documents](#)
3. Determine if any of the 3TG materials are in your products – [Rockwell Automation did this by:](#)
 - Having subject matter experts look over our commodity lists to identify commodities likely to have 3TG
 - **Example:** Almost anything with a circuit board or solder will have 3TG
4. Collect information from your supply chain for origin of 3TG
 - Identify appropriate suppliers
 - Request suppliers provide the CMR Template identifying whether they supply 3TG and if so, which 3TG smelters are in their supply chain
 - **Note:** This requires getting information from your suppliers, down through the entire supply chain

Critical to Program Success

- Documentation and tracking
- Determining “reasonable” due diligence
- Become a member of the Responsible Minerals Initiative (RMI) – strongly encouraged

Rockwell Automation's Conflict Minerals Program Information

Conflict Minerals Information	EPOCH (available to RA employees only)	External RA Website (available to the public)
Rockwell Automation Conflict Minerals Supply Chain Statement	X	X
Rockwell Automation Conflict Minerals General Information	X	X
Rockwell Automation Conflict Minerals SD Form		X
Rockwell Automation RMI CMRT	X	Request through: ProductStewardship@ra.rockwell.com

Direct Links:

[Link to EPOCH Conflict Minerals](#)
[Link to External RA Website](#)

For more information contact:
ProductStewardship@ra.rockwell.com

More Information – Additional Resources

<http://www.responsiblemineralsinitiative.org>

<http://enoughproject.org/category/topic/conflict-minerals>

<http://www.sec.gov/spotlight/dodd-frank/speccorpdisclosure.shtml>

<http://www.responsiblemineralsinitiative.org/conflict-minerals-reporting-template/>

<http://www.responsiblemineralsinitiative.org/conformant-smelter-refiner-lists/>

<https://www.rockwellautomation.com/en-us/company/about-us/sustainability.html>

Thank you



www.rockwellautomation.com



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