

2021

# Sustainability Accounting Standards Board (SASB)

## SASB REFERENCE TABLE

Responses are for  
Fiscal Year 2021 (October  
2020 to September 2021)

The following table provides Rockwell Automation information pertaining to the disclosure topics included in the Sustainability Accounting Standards Board (SASB) standard for the Electrical & Electronic Equipment Industry, which according to SASB, most closely aligns with our business. The information shared and cross-referenced in the table is based on the best available data at the time of publication relating to our fiscal year, which ended September 30, 2021. In some cases, data is estimated. Our statements with respect to current and future potential implications of sustainability topics are subject to numerous important risks, uncertainties, assumptions, and other factors, some of which are beyond our control, which could cause our actual results and business implications to differ materially from those expressed or implied by the information in this table.

Topic	Activity Metric	Category	Unit of Measure	Code
<b>Energy Management</b>	(1) Total energy consumed as an aggregate figure	Quantitative	(1) Gigajoules (GJ)	RT-EE-130a.1
	(2) Percentage of energy consumed from grid energy		(2) Percentage (%)	
<b>Hazardous Waste Management</b>	(1) Amount of hazardous waste generated	Quantitative	(1) Metric tons	RT-RR-150a.1
	(2) Percentage of hazardous waste recycled		(2) Percentage (%)	
<b>Product Safety</b>	(1) Number and aggregate quantity of reportable spills	Quantitative	(1) Number	RT-EE-150a.2
	(2) Quantity recovered		(2) Kilograms (Kg)	
	(1) Number of recalls issued (2) Total units recalled	Quantitative	Number	RT-EE-2501.1
<b>Product Lifecycle Management</b>	Total amount of monetary losses as a result of legal proceedings associated with product safety	Quantitative	United States Dollar (USD)	RT-EE-250a.2
	Percentage of products by revenue that contain IEC 62474 declarable substances	Quantitative	Percentage (%)	RT-EE-410a.1
	Percentage of eligible products, by revenue, that meet ENERGY STAR® criteria	Quantitative	Percentage (%)	RE-EE-410a.2
<b>Material Sourcing</b>	Revenue from renewable energy-related and energy efficiency-related products	Quantitative	United States Dollar (USD)	RT-EE-410a.3
	Description of the management of risk associated with the use of critical materials	Discussion	N/A	RT-EE-440a.1
<b>Business Ethics</b>	Description of policies and practices for prevention of: (1) corruption and bribery and (2) anti-competitive behavior	Discussion	N/A	RT-RR-510a.1
	Total amount of monetary losses as a result of legal proceedings associated with bribery or corruption	Quantitative	United States Dollar (USD)	RT-EE-510a.2
	Total amount of monetary losses as a result of legal proceedings associated with anti-competitive behavior regulations	Quantitative	United States Dollar (USD)	RT-EE-510a.3

**Response/Data/Reference, FY21**

(1) Total energy is calculated at 785,800 GJ. (2) 67% of total energy consumed is electrical power obtained from grid sources.

(1) Total amount of hazardous waste generated is 348 metric tons. (2) Per definition, 9.3% of the hazardous waste is recycled. Only 9.9% of the hazardous waste is landfilled, with the remaining waste incinerated or receiving physical/chemical treatment.

1) Experienced zero (zero events/zero kg) reportable spills. (2) Not applicable  
For Environmental Matters, see 2021 Form 10-K, Note 17 to Consolidated Financial Statements

(1) Zero voluntary or involuntary recalls under the U.S. Consumer Product Safety Commission or U.S. Food and Drug Administration requirements, as Rockwell Automation products are not in scope for those regulations. We determine and communicate Product Notice for potential non-safety product quality or reliability concerns that could significantly impact customers and include nature of concern and steps to resolve the concern. In FY21, we had 17 occurrences of Product Notice communications. (2) None

FY21, total of \$700,000 on product liability settlements for two separate lawsuits.

46% of products based on information provided by suppliers. Rockwell Automation manages the IEC 62474 declarable substances through our RoHS and REACH/SCIP programs. [Product Environmental Compliance](#)

Not applicable, Rockwell Automation products are not in scope for ENERGY STAR.

Our entire portfolio of products and services is focused on improving productivity, sustainability, and worker safety.  
Per SASB definition of “renewable energy-related and energy efficiency-related products,” \$1.8 billion revenue.

Rockwell Automation’s products utilize a variety of critical materials found in most electronic equipment. We continually evaluate risk around critical materials such as Rare Earth Elements (REE) and management of commodities such as copper and silver. We work to balance costs and risks related to the changing market and supply. In all situations, we implement appropriate risk mitigation efforts to ensure availability of product. Accomplished through 1) our Crisis Risk Monitoring Program that alerts us to issues with our supply base as well as any geopolitical concerns, 2) unique stocking strategies for ‘at risk’ material, and 3) approving multiple sources for material whenever possible.

Rockwell Automation purchases critical material both directly for our production needs as well as through our assembly partners. When engaging with either type of supplier, the Sourcing organization leverages Rockwell Automation Supplier Code of Conduct to set clear expectations related to conducting business, worker safety, and environment/social responsibility. The Supplier Code of Conduct is standard in all our purchase agreements.

- [Rockwell Automation Supplier Code of Conduct](#)

Our Ethics and Compliance Program is designed consistent with best practice and regulatory guidance and is focused on promoting our culture of compliance, ensuring all employees conduct business with the highest standards of ethics and compliance, and implementing procedures to prevent and detect unlawful or unethical conduct.

Key elements and aspects of this program include:

- Governance: Established Ethics and Compliance organization, an Ombuds Office, and internal senior leadership committee provide governance. Ethics and Compliance team has direct reporting line to the Board of Directors. In FY21, we communicated extensively on our refreshed Code of Conduct that along with the Partner Network Code of Conduct and Supplier Code of Conduct prohibits corrupt acts, bribery, and anticompetitive behavior. Global Anticorruption Policy applies to all employees and any companies that supply goods and services or develop, market, or buy and sell products or services on our behalf and prohibits corruption in all forms.
- Risk: Established Compliance Review Boards in certain jurisdictions to monitor issues and identify and escalate risks, and a process pursuant to which we conduct periodic compliance risk assessment in each business unit of the company and geographic region where we do business.

• Training & Communication: Annual ethics and compliance training that covers corruption, bribery, and anticompetitive behavior for all employees, as well as targeted training based on roles, geographic location, and other risk factors. Regular communication cadence from Ethics and Compliance team, leaders, and managers to employees regarding ethics and compliance, including conducting business in compliance with all laws and regulations.

• Monitoring: Implemented risk-based mitigation programs such as our third-party due diligence system to evaluate, vet, and train key partners and other third parties.

• Reporting & Investigation: Well-established Ombuds program that includes confidential hotline and other reporting mechanisms and robust investigation processes to identify and address potential misconduct.





• Measuring Effectiveness: The control elements of our Ethics and Compliance Program are audited by both internal and external auditors.

- [Rockwell Automation Code of Conduct](#)
- [Rockwell Automation Supplier Code of Conduct](#)
- [Rockwell Automation Partner Code of Conduct](#)

None, zero dollars

None, zero dollars



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