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 chain as well as any geopolitical concerns, (2) unique stockpiling 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 environmental/social responsibility. The Supplier Code of Conduct is standard in all our purchase agreements.

Rockwell Automation Supplier Code of Conduct

**Business Ethics**

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 Ethics Office, and internal senior leadership committee to provide governance. Ethics and Compliance team has direct reporting line to the Board of Directors. In FY22, we communicated extensively on our 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 Anti-Corruption Policy applies to all employees and any company that supply goods and services or develop, market, or 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 suppliers 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 Supplier Code of Conduct

- **Rockwell Automation Supplier Code of Conduct**
- **Rockwell Automation Partner Code of Conduct**