



Rockwell Automation Modern Slavery Statement 2024

This statement is made pursuant to Section 54 of the UK Modern Slavery Act 2015, the Australian Modern Slavery Act 2018 (Commonwealth), the California Transparency in Supply Chains Act of 2010, and Canada's Bill S-211, An Act to enact the Fighting Against Forced Labour and Child Labour in Supply Chains Act ("Canada's Act") and to amend the Customs Tariff. This statement sets out the steps that Rockwell Automation, Inc. and its subsidiaries (hereafter "**Rockwell Automation**" or "**Company**") took during the fiscal year ending September 30, 2024, and continue to take to mitigate the risk of modern slavery and human trafficking within our business and supply chain.

Rockwell Automation, Inc. provides this statement for itself and on behalf of Rockwell Automation UK Ltd. (UK Modern Slavery Act 2015), Rockwell Automation Australia Ltd (Commonwealth Modern Slavery Act 2018), and Rockwell Automation Canada, Inc., which are the entities directly covered by a disclosure obligation in their respective jurisdictions. Rockwell Automation follows policies and procedures around key human rights that are guided by our Code of Conduct and are aligned with international instruments such as the United Nations Guiding Principles (UNGPs) on Business and Human Rights and the International Labour Organization's Declaration of Fundamental Principles and Rights at Work.

This statement supports Rockwell Automation's commitment to operate free from any kind of modern slavery in any part of our business or supply chain with a zero-tolerance policy.

Our Structure and Operations

Rockwell Automation, Inc. is the world's largest company dedicated to industrial automation and digital transformation. It is a publicly traded company headquartered in Milwaukee, Wisconsin, U.S.A. and is the parent company for groups of companies which include those doing business as Rockwell Automation, including Rockwell Automation UK Ltd., Rockwell Automation Australia Ltd. and Rockwell Automation Canada, Inc. It has more than 27,000 employees and its operations extend to over 100 countries worldwide. Rockwell Automation procures goods and services from over 50 countries.

Supply Chain

Respect for human rights, fair labor practices, and humane working conditions are fundamental to our expectations of all suppliers and their subcontractors.

With our suppliers, we continue to create a more responsible supply chain aligned with the needs of our customers and society's changing expectations. We continuously turn to outside experts to help us assess opportunities to improve the sustainability of our supply chain and increase the level of engagement within our relationships.

In 2023, we adopted the Responsible Business Alliance's **(RBA) Code of Conduct** as Rockwell Automation's Supplier Code of Conduct. The RBA Code of Conduct is mandatory and prohibits forced, bonded (including debt bondage) or indentured labor, involuntary or exploitative prison labor, slavery or trafficking of persons, and child labor. We expect our suppliers to apply the **(RBA) Code of Conduct** standards to increase supply chain transparency.



Before doing business with any supplier, we make sure they adopt and accept our RBA Supplier Code of Conduct and policies and agree to comply with all applicable laws and regulations, whether by signing agreements or accepting our terms and conditions. We reserve the right to conduct audits to verify compliance of these dispositions by our suppliers.

A diverse, ethical, socially responsible, environmentally sound, and sustainable supply chain is important to Rockwell Automation. We partner with organizations that share our commitment to these values and believe that all suppliers should manage and report their social and environmental objectives. We collaborate with customers, suppliers, industry groups, governmental and non-governmental organizations (NGOs) around the world to support and advance these values in our industry, while also striving to enhance these relationships for greater transparency and resiliency in supply chains worldwide.

Our Policies

We have robust and monitored policies in place that aim to prevent and condemn modern slavery and human trafficking in our business and supply chains, which we re-evaluate as needed to ensure that they are effective and appropriate. As a signatory to the United Nations Global Compact (UNGC) since 2023, we have a commitment to respecting human rights in our business operations and supply chain. We actively benchmark our policies against international standards, and our Code of Conduct and other policies are available to all employees, contractors, and third parties in multiple languages.

- Our **Code of Conduct** condemns all forms of forced compulsory labor, exploitative child labor, and participation in human trafficking by any person or organization, as well as any modern forms of slavery.
- Our Global Policy on **Social Responsibility and Sustainability** explicitly condemns all forms of compulsory labor, exploitative child labor, and exploitative working conditions. It also acknowledges the right of our employees to form trade unions and to bargain collectively, subject to national statutory regulations and existing agreements. This policy contains our commitment to compensating our employees appropriately in each job market and reflects our commitment to ensuring that our compensation meets all legally established minimum wage requirements, and that we meet all provisions regarding working hours.
- Our **Global People Policy** mandates that all employees be treated with respect and dignity, not suffer discrimination or harassment, and be safe at work. It also defines the resources that all employees and non-employees have for reporting any violation of the **Code of Conduct** and of any of our policies.
- Our **Safety Policy** affirms that the health and safety of our people is one of our top priorities and reinforces the Company's commitment to provide a safe workplace where everyone can do their best work.
- The **(RBA) Code of Conduct** establishes standards to ensure that working conditions are safe, that workers are treated with respect and dignity, and that business operations are environmentally responsible and conducted ethically. This Code applies to all suppliers, their



facilities and their sub-suppliers, their workers including temporary, migrant, students, contractors, regular and any other type of workers.

- Rockwell Automation overtime policies also regulate the employee's working hours and comply with the laws of the countries where our employees are located.
- Our Global Background Investigations Human Resources Policy includes Rockwell Automation's responsibility to conduct background investigations on prospective employees and contractors to verify their personal information (identity, age, educational verification, global sanctions enforcement check, and other relevant data) and that they meet the requirements of the position according to applicable laws, such as minimum age.

Our belief that corporations can and should work towards the eradication of modern slavery is demonstrated by our signing of the United Nations (UN) Global Compact, an initiative that leverages the UN Sustainable Development Goals (SDG). Rockwell Automation supports eight UN SDGs as it nurtures a sustainable company, empower sustainable customers, and foster sustainable communities. The UN SDGs provide a universal framework for governments, businesses, and individuals to align and measure their contributions to social and environmental solutions. Rockwell Automation particularly supports UN SDG 8 "Decent work and economic growth", which promotes sustained, inclusive, and sustainable economic growth, full and productive employment, and decent work for all. This UN SDG also aims to taking immediate action and effective measures to eradicate forced labor, end modern slavery and human trafficking and secure the prohibition and elimination of the worst forms of child labor.

Risk identification, risk assessment, and due diligence

We believe there is minimal risk of causing, contributing to, or being directly linked to instances of modern slavery within our operations. Even though we believe the risk of modern slavery, child labor and human trafficking in our supply chains is low, we will not reduce or stop our efforts to identify, prevent and mitigate the risk of modern slavery in our company and in our supply chain. In conducting general due diligence, we have not found any areas of our business or supply chain to pose a significant risk for human trafficking or modern slavery. If identified, all modern slavery risks will be documented and addressed. Additionally, our suppliers operating in high-risk countries are continuously monitored and risk assessed.

During fiscal year 2024, there were no modern slavery or human trafficking reports identified with or raised by our suppliers, and we were not aware of any type of report that may show that any of our suppliers were convicted of this action. However, if such an issue were to arise, we would take appropriate actions together with the supplier to address the issue being raised and to develop a remediation plan.

As part of our due diligence efforts, we routinely analyze global dispositions to make sure that we are complying with applicable regulations and that our internal policies are aligned to them, including the Uyghur Forced Labor Prevention Act ([Public Law No. 117-78](#)), the German Supply Chain Act (although it does not currently apply to any Rockwell Automation entity), the CTPAT Security Program and the CTPAT Trade Compliance Program to combat forced labor, and Canada's Bill S-



211, An Act to enact the Fighting Against Forced Labour and Child Labour in Supply Chains Act and to amend the Customs Tariff.

In 2024, we observed the passage in Mexico of the Decree amending and adding provisions to the General Law to Prevent, Punish and Eradicate Crimes related to Trafficking in Persons and for the Protection and Assistance to the Victims of such Crimes. Exploitation under such law contemplates working hours that exceed the limits stipulated by the Mexican Federal Labor Law. In compliance with such law, we have implemented controls and monitoring mechanisms to prevent instances of such exploitation.

In 2024, we launched a CTPAT Security and CTPAT Trade Compliance supplier self-assessment questionnaire regarding our suppliers' efforts to address modern slavery risks and proactively assess and mitigate risks. The self-assessment questionnaire was issued to suppliers identified as high risk covering a 95% (ninety-five per cent) of U.S. imports based on imported value and we are still monitoring responses to achieve a 100% completion rate. There were no findings or potential or actual risks to be mitigated or monitored thus far.

Rockwell Automation has not faced a circumstance or risk derived from measures taken to eliminate the use of forced labor and child labor resulting in the loss of income to the most vulnerable families. However, this potential consequence to vulnerable persons (if identified) will be included in discussions to assess the impact of modern slavery in our supply chain.

Accountability

At Rockwell Automation, every employee is responsible for respecting human rights. We encourage anyone with a concern to speak up without fear of retaliation and they may do so anonymously if desired. Issues can be reported by any employee through multiple channels, including to Human Resources, to any manager, to a company lawyer or the Office of the Ombuds; this has created a culture of honesty and accountability. We track and investigate all allegations regardless of the source and, as appropriate, engage with senior management. Employees and non-employees (including our suppliers) can report concerns to our Office of the Ombuds (anonymously, if desired) by toll-free phone, fax, regular mail, email, or a web-based tool. The options for how to contact the Office of the Ombuds are detailed on our public website.

Our key suppliers are required to adhere to the **(RBA) Code of Conduct**, to conform to its standards and provisions and to apply the Code to their own suppliers through our contracts as a condition of doing business with us.

In case of any failure or violation of the Code of Conduct or applicable law, including any law relating to modern slavery, the Company will take immediate and appropriate action to remediate and address the issue, including termination of employment or business relationships.

Additionally, Rockwell Automation annually launches an anonymous global employee engagement survey to collect feedback on how the Company can improve its employees' experience. This survey allows us to gain insight into employee satisfaction and sentiment, but also to identifying potential risks of modern slavery in the workplace. This survey demonstrates Rockwell Automation's commitment to its belief that a safe and productive workplace results from greater employee cooperation, engagement, and collaboration.



Training

- Rockwell Automation trains all employees globally each year on the importance of issue reporting and resolution, and on various topics in our Code of Conduct regardless of the type of worker. This is a mandatory training.
- Our modern slavery training program educates employees who are in roles most likely to encounter modern slavery related issues and/or who regularly interface with our supply chain. This targeted training helps employees to recognize the signs and drivers that may encourage modern slavery, to respond appropriately and report them. A total of 414 employees were trained this fiscal year.
- We also delivered modern slavery and forced labor training to our top key suppliers to raise awareness on modern slavery risks and to continually improve practices on modern slavery. This training allows us to educate and open discussions with our suppliers in the event they have any concerns related to modern slavery risks.
- The self-assessment questionnaire for suppliers provided an opportunity to raise awareness with our suppliers of the importance of preventing modern slavery risks in the supply chain.

Effectiveness

During fiscal year 2024, we reviewed the following key performance indicators to assess the effectiveness of our efforts in addressing the risk of modern slavery in our business and supply chains:

Key Performance Indicator	Results
Employees trained on modern slavery during this fiscal year	A total of 414 employees were trained at the end of FY24 (97% completion rate). With this training we raised awareness of modern slavery with our employees who regularly interface with our supply chain or are most likely to encounter issues related to modern slavery, including employees globally in our Strategic Sourcing Organization (SSO), certain employees in our Lifecycle Services segment, and in Human Resources.
Employees trained on responsible business practices	100% completion of Annual Ethics Training by employees, contractors, and Board of Directors. This training is designed to ensure ethical decision making and reporting misconduct.
Suppliers trained on modern slavery	A total of 104 representatives from direct and indirect key suppliers were trained in a live session to continue ensuring awareness around modern slavery with key business partners. The session is available to key suppliers' representatives who couldn't attend the live session.



Contracts that include adherence to the Supplier Code of Conduct	All our key supplier contracts from our Strategic Sourcing Organization continue to include a requirement to abide by the Supplier Code of Conduct.
The number and nature of instances of non-compliance reported to Human Resources, Internal Controls or Sourcing (audits), any manager, Company lawyer or the Ombuds or through the Global Voices survey conducted every year by the Company	There were no modern slavery or human trafficking issues reported during FY24.
Percentage of significant suppliers that have undergone screening on human rights and actions taken	Self-assessment questionnaire was issued to suppliers identified as high risk covering a 95% (ninety-five per cent) of U.S. imports based on imported value
Workforce composition	85% of Rockwell Automation workforce are regular employees and only 15% are contingent workers. A workforce with a low percentage of contingent workers represents a lower risk of labor rights violations (as of March 2025)
Regular or ongoing strikes in the company's operations may indicate problems in the quality of social dialogue	Rockwell Automation has not experienced a strike in the Company's operations.
Number of suppliers with identified risks or terminated due to modern slavery violations	There were no suppliers with identified risks or terminated.

Our efforts to address modern slavery are also supported and vindicated by the awards and recognitions we receive. Among many global accolades, Rockwell Automation has been recognized by Ethisphere, a global leader in defining and advancing the standards of ethical business practices, 17 times, including again in 2024, as one of the World's Most Ethical Companies for our commitment to conducting business with integrity, for our responsible operations, and with positive impact to the communities where we operate. This award evaluates our efforts to combat modern slavery as well as our human rights policies.

Moreover, Rockwell Automation earned an Equality 100 Award in Human Rights Campaign Foundation's Corporate Equality Index 2025 recognizing equitable and inclusive working conditions and its reputation for treating people fairly.

Responsible Minerals Sourcing

Rockwell Automation supports the Dodd-Frank Wall Street Reform and 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) region. While we do not purchase tin, tungsten, tantalum and gold ("3TG Minerals") directly, they may exist in the materials and components we buy. Rockwell Automation's Conflict Minerals Program has evolved to address minerals originating from Conflict-Affected and High-Risk Areas (CAHRAS). Our conflict minerals program is extended to cobalt and mica, which are considered extended minerals that could be mined in conflict-affected areas contributing to unethical sourcing issues.

Rockwell Automation's goal is to comply with the conflict mineral regulations. In support of that goal, we actively work with our suppliers to responsibly purchase the materials and components we use in our products. We will continue performing due diligence to our supply chain to ensure transparency and to ensure that only conflict-free materials are used in our products and components.

To promote the ethical and responsible sourcing of materials used in Rockwell Automation's hardware products, in 2024, we continued to implement robust policies, compliance activities, internal controls, and industry best practices, and are actively engaged with our suppliers to continuously evaluate and improve our supply chain in these areas.

In 2024, we launched several responsible sourcing campaigns to align to best practices in relation to modern slavery, sustainability, conflict minerals, and information security, and each quarter communicated requirements and trends to our supply base. We continue to be a member of the Responsible Minerals Initiative and share their common goal of working together to evolve business practices to support responsible mineral production and sourcing globally. In addition, Rockwell Automation successfully executed our first extended minerals reporting campaign for cobalt and mica. More information can be found in our [2024 Sustainability Report](#).

Next steps

We will continue working on our efforts to identify, assess, and address modern slavery risks within our operations and supply chains. These efforts include:

- Continue raising awareness by providing training to our employees and members of our supply chain and a communication plan to enforce awareness.
- Conducting investigations of any non-compliance and taking prompt action as appropriate.
- Monitoring the effectiveness of our policies and procedures.
- Conducting and assessing the modern slavery self-assessment questionnaire results and implementing mitigation plans and actions, as well as evaluating their effectiveness.
- Developing teams assigned to work on the UN SDGs of Decent Work and Economic Growth
- Continue monitoring global regulations to combat modern slavery.

This statement was approved by the Board of Directors of Rockwell Automation UK Ltd, by Rockwell Automation Australia Ltd and Rockwell Automation Canada, Inc. in March 2025 and is signed by a director of each of these subsidiaries.

Consultation

Rockwell Automation, Inc. and its subsidiaries share the same core business operations and supply chains, as well as the modern slavery policies and risks. This joint statement has been prepared in consultation with group-wide key areas of our business which operate globally across Rockwell



Automation Inc. and subsidiaries, including Rockwell Automation UK Ltd., Rockwell Automation Australia Ltd., and Rockwell Automation Canada, Inc. The board of each of these subsidiaries is aware of the preparation of this statement and approved it.

Approval for this Statement:

A handwritten signature in blue ink, appearing to read 'P. Hadfield', with a horizontal line underneath.

Name: Philip Jonathan Hadfield
Title: UK Sales Director
Date: March 21, 2025
Rockwell Automation UK Ltd.

A handwritten signature in blue ink, appearing to read 'C. Barraha'.

Name: Caitlin Barraha
Title: Director, Public Affairs, Asia Pacific
Date: March 21, 2025
Rockwell Automation Australia Ltd.

A handwritten signature in black ink, appearing to read 'Steven Rizzo', with a stylized flourish at the end.

Name: Steven Rizzo
Title: Director, Business MV
Date: March 21, 2025
Rockwell Automation Canada, Inc.