



Rockwell Automation Modern Slavery Statement 2021

This statement is made pursuant to Section 54 of the UK Modern Slavery Act 2015, Australian Modern Slavery Act 2018 (Commonwealth) and the California Transparency in Supply Chains Act of 2010, and sets out the steps that Rockwell Automation, Inc. and its subsidiaries (hereafter "Rockwell Automation") took during the fiscal year ending September 30, 2021 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) and Rockwell Automation Australia Ltd (Commonwealth Modern Slavery Act 2018) which are the entities directly covered by a disclosure obligation in their respective jurisdictions.

This statement supports Rockwell Automation's commitment to operate free from any kind of modern slavery with a zero-tolerance policy.

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 including Strategic Sourcing, Compliance, and Legal, which operate globally across Rockwell Automation Inc. and subsidiaries, including Rockwell Automation UK Ltd. and Rockwell Automation Australia Ltd. The board of each of these subsidiaries is aware of the preparation of this statement and approved it.

Our Structure, Operations and Supply Chain

Rockwell Automation, Inc. is the world's largest company dedicated to industrial automation and information. It is a publicly traded company headquartered in Milwaukee, Wisconsin, USA and is the parent company for groups of companies doing business as Rockwell Automation, including Rockwell Automation UK Ltd. and Rockwell Automation Australia Ltd. It has more than 23,000 employees and its operations extend to over 100 countries worldwide. Rockwell Automation procures goods and services from over 50 countries.

Suppliers

Respect for human rights, fair labor practices, and humane working conditions are fundamental to our expectations of all suppliers and their subcontractors. Our global **Supplier Code of Conduct** is mandatory and prohibits forced, bonded (including debt bondage) or indentured labor, involuntary prison labor, slave labor, human trafficking and child labor.



During fiscal year 2021, there were no modern slavery or human trafficking reports identified with or raised by our suppliers. However, if such an issue were to arise, we would take appropriate actions together with the supplier to remediate the issue.

We routinely analyze global dispositions that impact our supply chain regarding forced labor prevention to make sure that we are complying with those regulations when applicable and that our internal policies are aligned to them. This fiscal year, we paid special attention to the Uyghur Forced Labor Prevention Act in the United States which impacts imports of items originating in the Xinjiang Uyghur Autonomous Region of China; the German Act which currently does not apply to any Rockwell Automation entity but served as a resource of good practices; and the CTPAT Program Trade Compliance Program to combat forced labor.

It is imperative for Rockwell Automation to take a proactive approach to ensure that not only our employees but all parts of our supply chain are educated in understanding the impacts of human trafficking and to take responsible actions to eliminate it. To achieve this objective, we pursued new technology and solutions to help us determine where to focus our efforts. This fiscal year the company invested in a recognized third-party due diligence supplier system for supply chain transparency and human trafficking due diligence. This system will automate our communication with suppliers to evaluate human trafficking risks, providing a high level of traceability to a greater number of suppliers. This system is currently in process of implementation and will be used during the next fiscal year. We are confident that this new tool will allow us to make a more conscious effort to combat modern slavery within our supply chain.

During this fiscal year, Rockwell Automation has been focusing its efforts to create a Responsible Supply Chain defined as the ethical design, planning, execution, control, and monitoring of supply-chain activities that have the objective of creating and managing commercial relationships that focus on the need for environmentally ethical and socially responsible products and services whose performance is measured globally as we seek to expand human possibility. These efforts focused on issues that have the potential to significantly impact our supply chain, including all forms of modern slavery. These ongoing efforts include a review of current policies and practices against international standards and best practices, described further in the Policies section below. To create a Responsible Supply Chain, we also receive feedback from an external consultancy (ERM) in supplier-related issues that significantly impact our supply chain, including modern slavery.

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. We actively benchmark our Code of Conduct, Supplier Code of Conduct, PartnerNetwork Code of Conduct and other policies against international standards.



- 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.
- Our **Global Policy People** 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.
- As part of our continuous improvement, our Strategic Sourcing group has defined as a 2022 objective to evaluate the adoption of some or all of the Responsible Business Alliance Supplier Code of Conduct which establishes standards to ensure that working conditions in the electronics industry and its supply chains are safe, that workers are treated with respect and dignity, and that business operations are environmentally responsible and conducted ethically. Subject matter experts within the company will be engaged to support the effort.

These policies and Codes are published in multiple languages and apply to all employees and contractors. Non-compliance with these policies is taken seriously, and we are committed to ensuring corrective measures are in place.

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. 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.

During fiscal year 2021, the Company performed a risk assessment in India for the assessment of the different types of compliance risks we might be facing in that country including modern slavery risks. This assessment did not deliver any modern slavery risks within our operations in that country.

Sustainalytics, an Environmental, Social and Governance ranking agency, analyzed and rated the performance of our company addressing key ESG issues that can affect our company's



long-term performance and pose a financially-material risk. The Sustainalytics report incorporates human rights and whistleblower programs issues and served as an additional resource to help us identify any necessary actions to manage those particular ESG issues and opportunities in our human rights policy. Rockwell Automation’s ESG Risk Rating continues to be Low Risk.

In fiscal year 2020, we commenced the use of a modern slavery and forced labor supplier self-assessment questionnaire. This questionnaire was implemented to assist Rockwell Automation in assessing our suppliers in relation to modern slavery and forced labor risks, and to determine where additional monitoring, support, and investigation were required. As mentioned in the Suppliers section above, this fiscal year the company concentrated its due diligence and risk identification efforts on implementing a new system for third party due diligence that will allow us to solicit the supplier self- assessment questionnaire from an expanded number of suppliers and with greater traceability.

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 anonymously if desired. We have an accountable culture where issues can be reported through multiple channels, including to Human Resources, to any manager, to a Company lawyer or the Office of the Ombuds. We track and investigate all allegations regardless of the source and involve senior management if necessary. Employees and non-employees (including our suppliers) can report concerns to our Ombudsman (anonymously, if desired) by toll-free phone, fax, regular mail, email or a web-based tool. The options for how to contact the Ombudsman are available on our public website.

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

Effectiveness

During fiscal year 2021, 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 483 employees were trained at the end of FY21. With this training we raised awareness of modern slavery within our employees. In addition of employees globally in our Strategic Sourcing Organization (SSO) and certain employees in our Lifecycle Services

	segment who regularly interface with our supply chain, this year we expanded this training to Human Resources employees in roles that are most likely to encounter issues related to modern slavery.
Suppliers trained on modern slavery	A total of 163 direct and indirect key suppliers were trained. This training ensured additional awareness around modern slavery with key business partners.
Contracts that include adherence to the Supplier Code of Conduct.	All our supplier contracts 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 FY21.
Review and update of our policies	We have started work to evaluating adoption of the Responsible Business Alliance Supplier Code of Conduct.

In addition to these indicators, we believe our efforts to address modern slavery are supported and vindicated by the awards and recognitions we receive. Among many global accolades, Rockwell Automation has been recognized by Ethisphere 13 times, including again in 2021, as one of the World's Most Ethical Companies for our commitment to conducting business with integrity, and with positive impact to the communities where we operate. This award includes modern slavery in its evaluation.

Training

- Rockwell Automation trains employees annually on the importance of issue reporting and resolution, and on various topics in our Code of Conduct.
- We expanded our Modern Slavery training program to educate employees not only in our Strategic Sourcing Organization, but in other areas and roles that are most likely to encounter issues related to modern slavery and/or who regularly interface with our supply chain. This training helps them to recognize the signs and drivers that may encourage modern slavery, to respond appropriately to them and report them. A total of 483 employees were trained this year.



- We also delivered modern slavery and forced labor training to our top key suppliers to raise awareness on modern slavery risks and affirmed our expectations around modern slavery. We will continue engaging with our suppliers to raise awareness and continually improve practices on this topic.

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 supply chains.
- Conducting investigations of any non-compliance and taking prompt action as appropriate.
- Monitoring the effectiveness of our policies and procedures.
- Administering the modern slavery self-assessment questionnaire to a targeted and extended group of suppliers through the new system/platform for supplier due diligence.
- Continue monitoring global regulations to combat modern slavery.

This Statement was approved by the Board of Directors of Rockwell Automation UK Ltd and by Rockwell Automation Australia Ltd in February 2022 and is signed by a director of each of these subsidiaries.

Approval for this Statement:

A handwritten signature in black ink that reads 'P Hadfield'.

Name: Phil Hadfield
Title: UK Sales Director
Date: February 21, 2022

A handwritten signature in black ink that reads 'C Barrah'.

Caitlin Barrah (Feb 21, 2022 18:03 GMT+11)

Name: Caitlin Barrah
Title: Australia Director
Date: February 21, 2022