



Rockwell Automation Modern Slavery Statement 2020

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, 2020 and continue to take to mitigate the risk of modern slavery and human trafficking taking place within our business or supply chain. This statement supports Rockwell Automation's commitment to operate free from any kind of modern slavery with a zero-tolerance policy.

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.

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 governance and compliance policies and procedures are set by Rockwell Automation, Inc. and cascaded to all subsidiaries, setting the values and standards that must be followed globally.

Our Structure, Operations and Supply Chain

Rockwell Automation, Inc. is the world's largest company dedicated to industrial automation and information, making its customers more productive and the world more sustainable. Rockwell Automation, Inc. 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. With more than 23,000 employees and operations that extend to over 100 countries worldwide, our flagship Allen-Bradley and FactoryTalk product brands are



recognized for innovation and excellence. Rockwell Automation is dedicated to conducting itself with the utmost integrity and ethical values and in accordance with relevant laws across the globe. We expect our suppliers and members of the Rockwell Automation PartnerNetwork™ to conduct themselves with these same values, as indicated in our Supplier Code of Conduct and PartnerNetwork Code of Conduct.

Our global supply chain is wide and diverse, procuring goods and services from over 50 countries. Respect for human rights, fair labor practices, and humane working conditions are fundamental to our expectations of all suppliers. Our global supply chain and sourcing team are committed to best-in-class productivity, delivery, quality, and risk mitigation within our supply base. We adhere to the highest standards of integrity and focus on our environmental footprint.

Suppliers

Our global **Supplier Code of Conduct** is mandatory in every supply agreement. It has clear rules around labor, including a prohibition against forced, bonded (including debt bondage) or indentured labor, involuntary prison labor, and/or slave labor. It also prohibits human trafficking, including transporting, harboring, recruiting, transferring or receiving vulnerable persons by means of threat, force, coercion, abduction or fraud for the purpose of exploitation. The Supplier Code of Conduct requires that our suppliers have a program that enables workers to report violations of the law and the Supplier Code of Conduct. Suppliers are required to hold their suppliers and subcontractors to the same Rockwell Automation standards as listed in this statement. Additionally, our suppliers have access to the Ombudsman Hotline to report any suspected instances of misconduct.

Our efforts to ensure that there is no modern slavery or human trafficking in any part of our supply chain extends to our standard supply agreements, whereby we obtain written acknowledgement of supplier obligations to comply with all applicable laws and policies. Our standard contracts assure that all commercial and legal issues have been considered and approved. They also state that all materials and products delivered to Rockwell Automation are compliant with any regulatory requirements and provide our right to conduct site visits and audits. Performance is monitored to drive continuous improvement in the supply chain.

During this fiscal year, 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 based on the nature of and circumstances surrounding the issue. This



could include working with the supplier to develop an action plan to remediate the issue, seeking out alternate suppliers, and/or terminating dealings with the supplier.

Policies

Rockwell Automation is committed to the highest standards of ethics and compliance as outlined in our **Code of Conduct**, which was updated in 2020. 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. Our Global Policy on **Social Responsibility and Sustainability** explicitly condemns all forms of compulsory labor, exploitative child labor, and exploitative working conditions. Our Code of Conduct and Supplier Code of Conduct require reporting of any suspected violation of these policies, and we have a long history of open reporting through our Ombudsman Hotline and other channels.

In addition to the above, Rockwell Automation has other policies and procedures that protect employees and address modern slavery and human trafficking concerns within our operations. As part of the Company's employment practices, all new employees are processed and documented through our resourcing and recruitment processes and policies. Rockwell Automation verifies candidate background information before employing people. Our Human Resources Policy about Global Access Termination Responsibilities states that any employee shall be free to terminate their employment upon reasonable notice.

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 commitment to preventing modern slavery, this year we refreshed the Company Code of Conduct. It was reviewed by a wide variety of Company subject matter experts, communication specialists and business leaders, and approved by the Business Standards Compliance Committee and our CEO. While the fundamental aspects of our Code remain unchanged, we intended to modernize the content and update certain substantive topics including modern slavery.



Rockwell Automation additionally complies with the Conflict Mineral Law and, in support of that, works with our suppliers to responsibly purchase the materials and components used in our products. We expect our suppliers to investigate the source and chain of custody of conflict minerals in the products they provide to us, to disclose due diligence information upon request, and to purchase minerals from responsible sources that do not contribute to human rights abuses.

We have a strong human rights framework comprised by the policies and Codes of Conduct discussed above, which we continue to re-evaluate as needed to ensure that they are effective and appropriate. In accordance with the Rockwell Automation Ethics and Compliance Program Charter, the Board of Directors, through the Business Standards Compliance Committee, supervises the implementation of, and compliance with, the Company's ethics and compliance policies.

These policies 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.

For more information about Rockwell Automation's commitment to ethics and integrity, please click the hyperlinks above.

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. We have robust resourcing and recruitment practices and policies that include background investigations on prospective employees and contractors to verify personal information and maintain the safety and security of our workplace and Company assets before any person is engaged in employment, to the extent permitted by applicable laws and regulations. These practices and policies also apply for Strategic Sourcing employees and anyone else who contracts with vendors for resources that provide regular onsite services to the Company.

During fiscal year 2020, the Company performed a risk assessment in China in order to make a holistic assessment of the different types of compliance risks we might be facing including modern slavery risks. We are in the process of evaluating the results of the risk assessment that will allow us to identify any modern slavery risks and to take further action where necessary.

We recognize that we can be indirectly exposed to modern slavery risks through our supply chain. Some of our suppliers may operate in countries with high rates of human trafficking



or a lack of transparency, and we have considered these factors to plan and perform future risk assessments and evaluation of our suppliers.

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. The questionnaire helped us to foster a more transparent collaboration with suppliers to address these risks and to help them understand what is required to identify and address modern slavery risks in their supply chains. The questionnaire was sent to key suppliers based on the scope of business conducted with Rockwell Automation. The responses helped to identify potential opportunities for improvement in identifying and addressing modern slavery and human trafficking.

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.

Accountability

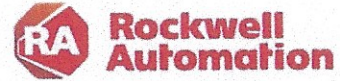
At Rockwell Automation, every employee is responsible for respecting human rights. We encourage anyone with a concern to speak up without fear of retaliation and anonymously if desired. We have an accountable culture where issues can be reported through multiple channels, including to Human Resources, 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. Our suppliers also have access to the Ombudsman Hotline to report any suspected instances of misconduct.

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 2020, 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 |
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| Employees trained on modern slavery during this fiscal year. | A total of 286 employees were trained globally during FY20. With this training we |



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| | raise awareness of modern slavery within our employees. |
| Suppliers trained on modern slavery during this fiscal year. | A total of 120 direct and indirect key suppliers were trained during FY20, representing the majority of our global procurement spend. 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 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 FY20. |
| The modern slavery and forced labor supplier self-assessment questionnaire. We commenced to use this questionnaire with our top 90 suppliers based on spend. | There were no priority findings associated with modern slavery risks to report. |

We intend to continue to assess these metrics each year and to consider whether alternative or additional KPIs would be most appropriate to measure the effectiveness of our program.

Training

Rockwell Automation trains employees annually on the importance of issue reporting and resolution. We require employees to report any activity that might be in violation of our standards of business conduct, including violations of our policies prohibiting human trafficking under our Global Policy on Social Responsibility and Sustainability, our Code of Conduct, and our Supplier Code of Conduct. Employees and non-employees 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.

During fiscal year 2020, a total of 286 employees in our Strategic Sourcing Organization were trained, along with employees in other areas involved in working with third parties whose roles are of particular relevance in relation to managing modern slavery risks. This training provided employees with information about Modern Slavery and Forced Labor, and an explanation of our policies and Company statement related to it. It helped employees to recognize problematic situations and guide them on what to do in case they suspect a third party is engaging in human trafficking and/or forced labor.

In addition to training, supplementary information and guidance is available to all employees globally in our Company website about modern slavery. This includes guidance on what to do in the event a suspected or potential case of modern slavery is identified.

During fiscal year 2020, we also delivered modern slavery and forced labor training to 120 of our top key suppliers. This training improved supplier awareness on modern slavery risks and affirmed our expectations around modern slavery and allowed us to build more transparent and collaborative relationship with our suppliers. 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 will include:

1. Providing training to our employees and supply chains.
2. Conducting investigations of any non-compliance and taking prompt action as appropriate.
3. Monitoring the effectiveness of our policies and procedures.
4. Administering the modern slavery self-assessment questionnaire to a targeted group of suppliers.

This Statement was approved by the Board of Directors of Rockwell Automation UK Ltd on the 12th day of January 2021 and by Rockwell Automation Australia Ltd on the 15th day of December 2020 and is signed by a director of each of these subsidiaries.

Approval for this Statement:



Phil Hadfield

Name: Phil Hadfield
Title: UK Sales Director
Date: 12 January 2021

Anthony Wong

Name: Anthony Wong
Title: Australia Director
Date: 15 December 2020