



## Rockwell Automation Modern Slavery Statement 2022

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, 2022 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 in any part of our business or supply chain 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 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 26,000 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.

According to our prequalification effort for modern slavery compliance, we will not do business with new suppliers unless they sign our Supplier Code of Conduct which condemns



any form of modern slavery and clearly states our expectations of doing business the right way.

During fiscal year 2022, 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. We will continue to take action to assess and address our modern slavery risks and equip ourselves to respond to any future cases of modern slavery that we may identify in our operations or supply chains.

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. Examples of these dispositions are 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 (does not apply to any Rockwell Automation entity); 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. We are currently working on the implementation of a third-party due diligence supplier system for supply chain transparency and human trafficking due diligence that will provide a high level of traceability of suppliers to make a more conscious effort to combat modern slavery within our supply chain.

We are driving and influencing environmental, social and governance excellence across our supply chain, where modern slavery falls under the social element.

Our diverse suppliers recognize the importance and value of sustainability for the mutual benefit of our partners, customers, communities, and the world.

With our suppliers, we continue to create a more responsible supply chain aligned with the needs of our customers and society's changing expectations, which include efforts against modern slavery. Just as we did at the corporate level with our 2020 materiality assessment, we turned 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 2022, we developed a roadmap to assist with our responsible supply chain management efforts. This roadmap includes peer benchmarking, reputational, financial and operations risk evaluation, management, and mitigation. We also completed initial work toward the creation of a robust and updated Supplier Code of Conduct planned for completion in the

next 18 months. The updated Supplier Code of Conduct will increase supply chain transparency and establish a system of checks and balances to address materials and products sourced from countries where environmental and human labor laws are either lacking or under enforced.

We are looking to the Responsible Business Alliance's (RBA) Code of Conduct as a guideline for our Supplier Code of Conduct update. The RBA is the world's largest industry coalition dedicated to corporate social responsibility in global supply chains. Its Code of Conduct is a set of social, environmental, ethical, and management systems standards. RBA updates the Code every three years to ensure relevance to current issues and expectations facing global supply chains, including modern slavery.

We continue to reimagine the role of our supply chain, manufacture in an even more responsible and sustainable manner, and continue to exceed customer expectations with trusted, high-level service and solutions.

## **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. Our policies are consistent with the UN Guiding Principles on Business and Human Rights. 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.
- We are looking to the Responsible Business Alliance's (RBA) Code of Conduct as a guideline for our Supplier Code of Conduct. RBA Code of Conduct 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 are 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.

### **Responsible Minerals Sourcing**

Rockwell Automation is committed to high ethical standards and social responsibility. This includes supporting 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 directly, they may exist in the materials and components we buy. Rockwell Automation's goal is to comply with the Conflict Mineral law. In support of that goal, we are also working with our suppliers to responsibly purchase the materials and components we use in our products. We expect the same supply chain transparency and practices from our suppliers. Our suppliers are expected to investigate the source and chain of custody of conflict minerals in the products they provide to us, to disclose their information on due diligence to us on request, and to purchase minerals from responsible sources that do not contribute to human rights abuses in the DRC region. We work with our suppliers on a case by case basis to meet these goals. We rely on the Conflict Minerals Reporting Template for data collection and support the Responsible Minerals Initiative.

### **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. If identified, all modern slavery risks should be documented and addressed.

This fiscal year the company continued focused 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. It's our priority to use the self-assessment questionnaire in FY23.

### **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 Ombuds (anonymously, if desired) by toll-free phone, fax, regular mail, email or a web-based tool. The options for how to contact the Ombuds are available on our public website.

Our key suppliers are required to adhere to our Supplier Code of Conduct, to conform to its standards and provisions and to apply the Code to their own suppliers through our contracts. As stated in our Supplier Code of Conduct, we require that, as a condition of doing business with us.

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.

### Training

- Rockwell Automation trains employees annually on the importance of issue reporting and resolution, and on various topics in our Code of Conduct.
- Our Modern Slavery training program educates employees globally in areas and roles that are most likely to encounter issues related to modern slavery and/or who regularly interface with our supply chain. This targeted 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 342 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 continually improve practices on modern slavery.

### Effectiveness

During fiscal year 2022, 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 342 employees were trained at the end of FY22. 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.                                      |
| Suppliers trained on modern slavery                                                                                                                                                                                                         | A total of 110 direct and indirect key suppliers were trained to continue ensuring 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 FY22.                                                                 |

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 14 times, including again in 2022, 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 an assessment of our human rights policy.

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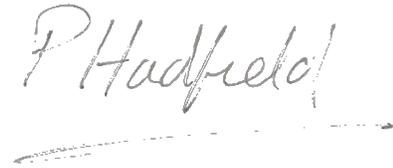
### Next steps

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.
- 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 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 2023 and is signed by a director of each of these subsidiaries.

### Approval for this Statement:



Name: Phil Hadfield  
Title: UK Sales Director  
Date: February 20, 2023



Name: Caitlin Barrah  
Title: Australia Director  
Date: February 20, 2023