



Rockwell Automation Modern Slavery Statement 2023

This statement is made pursuant to Section 54 of the UK Modern Slavery Act 2015, 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**") took during the fiscal year ending September 30, 2023, 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.

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, Operations and Supply Chain

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, USA and is the parent company for groups of companies which includes those doing business as Rockwell Automation, including Rockwell Automation UK Ltd., Rockwell Automation Australia Ltd. and Rockwell Automation Canada, Inc. It has more than 29,000 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.

With our suppliers, we continue to create a more responsible supply chain aligned with the needs of our customers and society's changing expectations. Just as we did at the corporate level with our 2020 extensive materiality assessment to update and inform our sustainability strategy with the assistance of ERM, a global leader in this field, 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.

We have adopted the Responsible Business Alliance's **(RBA) Code of Conduct** as a guideline for updates to Rockwell's Supplier Code of Conduct. The RBA is the world's largest industry coalition dedicated to corporate social responsibility in global supply chains. The RBA's Code of Conduct, a set of social, environmental, and ethical industry standards, outlines for our suppliers the standards we expect as a condition of doing business with Rockwell. The RBA's 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 have incorporated these standards into our supplier selection process, and our goal is to partner with suppliers who champion these new standards and apply those standards to their supplier network. The **(RBA) Code of Conduct** will provide an enabling framework to increase supply chain transparency and establish a system of checks and balances to address materials and products secured from countries where environmental and human labor laws are either lacking or underenforced.

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

A diverse, ethical, socially responsible, environmentally sound, and sustainable supply chain is important to Rockwell. 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.

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 our supply chains, our integrity and business ethics which are the foundation of our business strategy and success. 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.
- 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 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.

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.

During fiscal year 2023, 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 those regulations when applicable and that our internal policies are aligned to them. United States imports/importers are subject to the Uyghur Forced Labor Prevention Act ([Public Law No. 117-78](#)), also known as the UFLPA, which supports enforcement of the prohibition on the importation of goods into the United States manufactured wholly or in part with forced labor in the People's Republic of China, especially from the Xinjiang Uyghur Autonomous Region, or Xinjiang.

We monitor the German Act although it does not currently apply to any Rockwell Automation entity; we monitor and comply with the CTPAT Program 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 2023, we implemented a new third-party due diligence tool for supply chain transparency and human trafficking due diligence that provides a high level of traceability of suppliers for making a more conscious effort to combat modern slavery within our supply chain. This tool allows us to solicit a supplier self-assessment questionnaire and have more efficient communications with our suppliers regarding their efforts to address modern slavery risks and proactively assess and mitigate risks. Given this tool was launched at the end of 2023, we are still in the process of reviewing the information obtained from our suppliers via this tool. Our efforts in this regard include identifying any actual or potential risks and, where applicable, assessing mitigation plans and actions to increase awareness while also ensuring we have deployed the tool to its fullest advantage.

Rockwell has not yet taken measures to remediate the loss of income to the most vulnerable families that results from eliminating the use of forced labor and child labor in the company's activities and supply chain given that this is a new indicator requested by the Canada's Act; 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; they may also 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 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 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 stated in our **(RBA) 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 all employees globally each year 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 employees to recognize the signs and drivers that may encourage modern slavery, to respond appropriately to them and report them. A total of 543 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.
- The third-party due diligence tool for suppliers provides an opportunity to raise awareness with our suppliers of the importance of assessing modern slavery risks in the supply chain.

Effectiveness

During fiscal year 2023, 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 543 employees were trained at the end of FY23. 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 153 representatives from direct and indirect key suppliers were trained in a live session to continue ensuring awareness around modern slavery with key business

	partners. However, the training 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 FY23.

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 16 times, including again in 2024, 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.

Responsible Minerals Sourcing

Rockwell will continue efforts surrounding conflict minerals— tungsten, tantalum, tin, and gold—and will expand these efforts by launching our first-ever extended mineral reporting campaign for cobalt and mica.

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.

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:

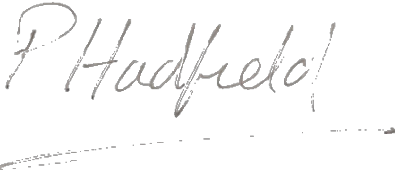
- Continue raising awareness by providing training to our employees and members of our supply chain.
- Conducting investigations of any non-compliance and taking prompt action as appropriate.
- Monitoring the effectiveness of our policies and procedures.
- Assessing the modern slavery self-assessment questionnaire results and evaluating the possibility to extend the questionnaire to more suppliers.
- Developing teams assigned to work on the United Nations Global Compact Sustainable Development Goal of Decent Work and Economic Growth supported by our Responsible Supply Chain, that includes actions to eradicate modern slavery.
- 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 2024 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:



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