

Anti-Corruption Policy

Rockwell Automation is against corruption in all forms and all of us must take an active role in ensuring it is not part of our business activities. Our business environment includes both private (for profit) and public (governmental) enterprise and depends heavily on our service and supply network and our channel partners; our anti-corruption efforts apply to the full business environment of Rockwell Automation.

Every country in the world prohibits bribery and other forms of corruption. A growing number of countries have laws that apply to activities outside that country.

For example:

- The Foreign Corrupt Practices Act is the U.S. law that prohibits employees or representatives of a U.S. corporation from giving anything of value, directly or indirectly, to an official of a government (or an official of a company that is owned or controlled by a government, a so-called “state-owned” company) to obtain or retain business or influence an official act or decision. The FCPA prohibits bribery and restricts gift giving and hospitality everywhere the US company does business. Penalties for violators include fines, disgorgement of ill-gotten gains, and – for individuals – imprisonment of more than one year.
- The U.K. Bribery Act of 2010 makes bribery a crime in both private and public transactions. As with the FCPA, the U.K. Bribery Act of 2010 applies to the global business activities of any company doing business in the U.K. The U.K. Bribery Acts prohibits bribery and restricts gift giving and hospitality wherever the company does business. Penalties for violators include fines, debarment from European Union public sector contracts, director disqualification, and – for individuals – imprisonment for a maximum of 10 years.

Many countries have laws that restrict gift giving and hospitality in local commerce, in both public and private transactions. To avoid corruption, many public laws and private policies define the value at which a gift becomes a means to improperly influence a decision maker. As an example, purchasing officers of the US government are prohibited by law from accepting any hospitality.

There are many danger signals that should cause someone to seek advice to determine if a proposed transaction is consistent with applicable law. Included among those danger signals are:



- Any transaction involving a payment to a government official or a member of an official's family.
- Agents or representatives requesting unusual commissions for a transaction or suggesting that they must incur unusual expenses.
- Proposed transactions involving a business where a government official or a close family member has an interest.

Our Anti-Corruption Policy Applies Across the Globe:

- We prohibit all forms of bribery, no matter how small the amount given or received.
- We reject the idea that our policy should be flexible because of customs in certain countries.

We Expect Our Business Partners to Follow These Simple Rules:

- No bribes
- No facilitating payments
- No excessive gifts or entertainment

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