



MEMBER CODE OF CONDUCT

Rockwell Automation, Inc. and its affiliated companies around the world (collectively “Rockwell Automation” or “we” or the “Company”) conduct their business affairs in accordance with governing laws and with the highest standards of business conduct. All Rockwell Automation employees are expected to adhere to the [Rockwell Automation Code of Conduct](#) in all of their business dealings, including with members of the PartnerNetwork™. We want to be respected for honesty and unquestioned integrity and that means acting ethically in all that we do. Our continued business success depends on our customers and shareowners recognizing these qualities as Rockwell Automation hallmarks.

In keeping with our commitment to ethical standards, Rockwell Automation also expects that, as a member of the Rockwell Automation PartnerNetwork™ (“Member”), your company will comply with governing laws, adhere to our ethical standards, and follow this PartnerNetwork™ Code of Conduct (“Code”). By doing so, we will work together with uncompromising integrity to deliver the value that our end customers want and expect.

BRIBERY AND CORRUPTION

Rockwell Automation actively combats corruption and avoids even the appearance of corruption in all of its business dealings. We prohibit all forms of Bribery, no matter how small the amount given or received. “Bribery” is the offer of anything of value to an individual to obtain an improper advantage. Bribery is illegal (under the US Foreign Corrupt Practices Act, UK Bribery Act, and other laws) and against Rockwell Automation policy. We reject the idea that our policy should be flexible because of customs in certain countries.

Members agree not to engage in bribery or in activity that gives the appearance of bribery. Members agree that their employees and others working on its behalf will not engage in bribery in private transactions, in public transactions, or when seeking service from public servants or political candidates.

We also expect that Members will not provide excessive gifts or entertainment and will comply with all applicable laws related to gifts to and entertainment of government officials and employees of commercial entities.

COMPETITION AND ANTITRUST

Rockwell Automation complies with all applicable competition laws (called antitrust laws in some countries) while conducting our global business. Competition laws promote fair and honest competition and protect suppliers and customers from anti-competitive practices. These laws prohibit competitors from restraining competition by, for example, agreeing to set prices, rig bids or divide customers. They also prohibit many other anti-competitive practices such as setting resale prices or abusing a dominant market position.

Rockwell Automation expects that Members will promote fair and honest competition and will comply with all applicable competition laws. Rockwell Automation also recognizes that some Members are actual or potential competitors of one another under the law and further expects that Members will not use their participation in the PartnerNetwork™ to obtain competitive information from a competitor or communicate with a competitor about improper subjects including, without limitation:

- prices, profits and internal cost information, or competitors' expectations as to their future prices or internal costs;
- dividing markets by product, customer or geography;
- limiting the supply of a product or a class of products;
- excluding competitors from a market; or
- boycotting or refusing to deal with any competitor, vendor or supplier.

EXPORT CONTROLS

Whenever Rockwell Automation shares, sells, gives, or otherwise transfers Company products, services or technical data to another country or to citizens of another country, we expect that our employees will comply with applicable laws of the countries involved in the transaction.

Rockwell Automation expects that Members will comply with all governmental laws, regulations, and orders applicable to any import, export, transfer, purchase, and sale of goods, technology, and services, including without limitation United States export control and sanctions laws and regulations.

EMPLOYEE SAFETY AND RESPECT FOR THE ENVIRONMENT

Rockwell Automation complies with governing environmental and safety laws and regulations. We seek to reduce, minimize or eliminate waste and the release of potentially hazardous materials into the environment. We also seek in general to prevent adverse impact on the health and safety of our employees and communities as a result of our operations and to recognize and respond to community concerns.

Rockwell Automation expects that Members will conduct their business in a way that protects the environment and complies with governing environmental laws and regulations.

Rockwell Automation also expects that Members will provide a safe work environment and comply with governing safety laws and regulations.

RESPECT AND CONCERN

Respecting each other's rights and dignity is a basic value at Rockwell Automation and we hold Members to the same commitments as our employees. Specifically, Rockwell Automation expects Members to prohibit discrimination, harassment, and physical or verbal threats, all of which can deny people the opportunity to contribute to the best of their abilities. Members will uphold worker human rights and condemn all forms of forced compulsory labor and exploitative child labor.

Rockwell Automation expects Members to acknowledge the right of employees to form trade unions and to bargain collectively, subject to national statutory regulations and existing agreements. Members will strictly prohibit harassment of or retaliation against any employee for reporting an activity that does or might violate the Code.

Harassment in all its forms, including workplace violence, sexual harassment or discrimination, is prohibited to maintain a workplace that is safe, secure, respectful, and inclusive for everyone and is specifically prohibited by the Rockwell Automation Code of Conduct and the Rockwell Automation People Policy. It is our expectation that these policies apply equally to our employees while present in your workplace. The Company will not tolerate conduct by customers, vendors or any other business person conducting business with the Company that violates these policies. If we find that a customer, vendor or any other person conducting business with the Company is harassing a Rockwell Automation employee, we will take immediate steps to see that it stops.

CONFLICTS OF INTEREST

Rockwell Automation wants its business relationships to be transparent and free from any conflicts of interest. For that reason, Members must inform Rockwell Automation if a Member's employee, investor or other affiliated person, or his or her family member, has a relationship with a Rockwell Automation employee who can make decisions that may affect the Member's business, or if a Rockwell Automation employee has any interest of any kind in the Member's business. Ownership of less than 1% of a public company's outstanding shares need not be disclosed unless it might influence judgment or decisions.

RAISING AND REPORTING CONCERNS

We expect any Member that knows about or suspects a violation of this Code or the Rockwell Automation Code of Conduct to promptly report such a violation to its Rockwell Automation channel manager and/or the Rockwell Automation Office of the Ombuds through one of the following outlets. You may remain anonymous throughout the reporting process, as permitted by local law.

Rockwell Automation Office of the Ombuds:

<https://www.rockwellautomation.com/en-us/company/about-us/contact-us/report-ethical-concerns.html>

COOPERATION

If we receive an allegation involving a Member, we expect the Member to cooperate with our investigation. Likewise, we agree to cooperate with complaints or ethical concerns that a Member may have involving our Company.

rockwellautomation.com — expanding human possibility®

AMERICAS: Rockwell Automation, 1201 South Second Street, Milwaukee, WI 53204-2496 USA, Tel: (1) 414.382.2000, Fax: (1) 414.382.4444
EUROPE/MIDDLE EAST/AFRICA: Rockwell Automation NV, Pegasus Park, De Kleetlaan 12a, 1831 Diegem, Belgium, Tel: (32) 2 663 0600, Fax: (32) 2 663 0640
ASIA PACIFIC: Rockwell Automation, Level 14, Core F, Cyberport 3, 100 Cyberport Road, Hong Kong, Tel: (852) 2887 4788, Fax: (852) 2508 1846