

Global Policy Trade

We will follow all the rules and regulations that apply to importing or exporting products, parts, materials, software, and technology for or on behalf of Rockwell Automation.

WHO IS THIS POLICY FOR?

All Employees who have a role in developing, marketing, delivering or shipping or receiving products or technology for or on behalf of the Company.

Key Policy Principles

- The Global Trade Compliance team helps to administer and direct our global trade program (the importing and exporting of products, parts, materials, software, and technology), however all **Employees** are responsible for understanding and following the rules that apply to them.
- Each country has rules that govern the exporting and importing of products and technology from that country that must be understood and followed by all relevant and involved Employees. These rules can apply even when we are sending technology electronically.
- Some countries have rules that prohibit anyone from agreeing to participate in a boycott of another country in any way, including refusing to do business with that country or source products or services from that country.

Global Trade Generally

- The rules that govern global shipments of products and transferring technology are complex. The **Company** has processes, procedures and specific groups that are responsible for properly classifying, shipping, exporting and importing our products, parts, materials, software, and technology.
 - All Employees are required to follow the Company processes and procedures for shipping anything (products, parts, samples or other items) across an international border.
 - This includes physical shipments and electronic transfers of software or technology.
- The Global Trade Compliance team is responsible for establishing and approving the Company policies and procedures involving global shipments and transfers.
- There are several guides and procedures that are linked to this policy that further define the processes that must be followed to ensure compliance with the global and local trade rules.
- You should only interact or correspond with government officials if you have the proper delegation of authority from the Company. If you are in doubt about your authority, please contact the Director, Global Trade Compliance.

Export Rules

- Governments across the world:
 - Want to know what products and technology are being shipped or transferred outside of their borders;
 - Want to know where the products and technology are being shipped or transferred to; and,
 - Have laws that prohibit shipping or transferring the products or technology to certain countries, locations, companies or people. The rules are in place for a variety of reasons, including:
 - Wanting to know the information for trade-related statistics;
 - Wanting to control or prevent access to certain technology for strategic or military reasons; and,
 - Wanting to apply pressure for political reasons.
- Failure to comply with export rules can have severe legal and economic consequences for you and for the Company.
- To comply with the export rules, we have established processes for classifying the products that we ship and screening the customers and locations that we are shipping to.
 - If you need or want to ship products, parts, samples (of anything), software, or transfer technology to another country, you need to know the rules and follow the established processes.
 - The rules apply even if you are shipping something as simple as a shirt to another country.
- There are laws that govern the sharing (providing access to through a server, shared drive or via e-mail) or export of **Controlled Technology**, **Controlled Services** and **Controlled Products** within your country with those who are not citizens of your country.
 - For example, in the United States, if certain technology is deemed controlled by the United States government for military or other strategic reasons, it is illegal to show or send that technology to citizens of other countries, even if they are in the office next door to you or you are sending it by email.
 - If your job requires it or if you are unsure about the rules, you should consult:
 - The Global Trade Compliance team;
 - Your Designated Contact (a list of Designated Contacts is available on the Global Trade Compliance Website); or,
 - Your regional legal counsel.
- You should be aware of those countries that we are prohibited from doing business with because they are sanctioned or embargoed. These countries are listed on the [Global Trade Compliance website](#). While we do have processes in place to prevent shipments to those locations, it's possible that simply sending technical information or providing customer support may violate the rules.
- Your **Business Segment**, **Region** or **Function** may have additional rules or processes that you must be aware of and follow related to importing, exporting or transferring technical data.

Import Rules

- Governments across the world want to know what products and technology are being imported across their borders. Like the rules for export, governments want to know what is being imported for trade statistics purposes and security purposes. Unlike the rules for export, governments want to know how the import is valued for duty (revenue) purposes.
 - We have established processes to follow all applicable customs regulations, including providing accurate documentation, country of origin markings, classification of goods, and proper valuation declarations, including those of minimal or no charge value (such as tooling, components, samples, marketing merchandise, etc.). You must be familiar with the rules and established processes and follow those processes if your job requires it.
 - The Global Trade Compliance team must approve participation in any special duty reduction programs, such as free trade agreements (NAFTA – North American Free Trade Agreement, EU – European Union Preferential Trade, ASEAN – Association of Southeast Asian Nations, Mercosur – Southern Common Market, etc.), bonded warehouses, temporary imports under bond, duty drawback, and free or foreign trade zones.
 - You should direct all correspondence with local customs authorities to your local Designated Contact or the Global Trade Compliance team.
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Anti-Boycott Rules

- You should never cooperate with any restrictive trade practice or boycott that is prohibited by U.S. or other laws.
- An “illegal boycott request” under U.S. law is any request from a third party to take any of the following described actions against countries friendly to the U.S., including but not limited to Israel:
 - Refusal to do business with or in Israel, or with other persons or entities that do business in or with Israel, or other countries friendly to the U.S.;
 - Furnishing information about business relationships with or in Israel;
 - Discriminating against someone based on race, religion, sex, or national origin; or,
 - Executing business documents such as contracts, letters of credit, warranties that contain illegal boycott requests (such as prohibiting Israeli product content, product delivery through Israel, Israeli business dealings, compliance with country boycott laws, etc.)
- To comply with U.S.-required boycott reporting regulations, you must report all boycott requests to your assigned Designated Contact or the Global Trade Compliance team.