

Forced Labour and Child Labour In Supply Chains Act Report – Sensia Ltd.

Attestation

In accordance with the requirements of the *Fighting Against Forced Labour and Child Labour In Supply Chains Act* (Act), and in particular section 1.1 thereof, I, Melissa Nandi in the capacity of Secretary, attest that I have reviewed the information contained in the report on behalf of the governing body Sensia Limited. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed within this report and I attest that I have the authority to bind Sensia Limited.

A handwritten signature in cursive script, appearing to read "Melissa Nandi", written over a horizontal line.

Melissa Nandi

Secretary

May 14, 2025

FY 2024 Forced Labour and Child Labour in Supply Chains Act Report – Sensia Ltd.

This annual report has been prepared in accordance with the Fighting Against Forced Labour and Child Labour in Supply Chains Act, and sets out the steps taken by Sensia Ltd. and its affiliates (collectively “Sensia”) during our financial year from 1 October 2023 to 30 September 2024 (“FY24”) to deal with modern slavery risks within our business and supply chains.

This statement supports Sensia’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.

1. Organization Structure

Sensia is the oil and gas industry’s first digitally enabled, integrated automation solutions provider, unifying sensing, intelligence and action to optimize decisions and dramatically reduce the time and interactions between detection, diagnosis and resolution. Sensia has legal entities in more than a dozen countries with its operations in United States managed by Sensia LLC and its non-US companies, like Sensia Ltd., rolling up to Sensia Netherlands B.V. Sensia Ltd.

2. Supply Chains

All suppliers must meet recognized labor standards and uphold the human rights of workers, treating them with dignity and respect as understood by the international community. This applies to all workers including temporary, migrant, student, contract, and direct employees. With our suppliers, we continue to create a more responsible supply chain aligned with the needs of our customers and society’s changing expectations. All suppliers must adhere to Sensia’s Supplier Code of Conduct, which among other industry recognized standards, provides that all of Sensia’s suppliers must adopt or establish a management system that ensures that:

- Supplier’s employees have freely chosen to be employed and that all workers shall be free to leave work at any time or terminate their employment.
- Suppliers do not use child labor
- Compensation paid to workers must comply with all applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits.
- Supplier does not allow for any harsh or inhumane treatment including any sexual harassment, sexual abuse, corporal punishment, mental or physical coercion or verbal abuse of workers
- Supplier does not unlawfully harass or discriminate against workers based on race, color, age, gender, sexual orientation, ethnicity, disability, pregnancy, religion, political affiliation, union membership or marital status.

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. We endeavor to partner with organizations that share our commitment to these values and believe that all suppliers should manage and report their social and environmental objectives.

3. Policies in relation to slavery and human trafficking

Sensia has policies applicable both to its employees and to our third party partners that aim to prevent and condemn modern slavery and human trafficking in our business and supply chains. We follow the high standards established by both Rockwell Automation and SLB when it comes to establishing our Code of Conduct and other policies to fight against the risk of forced labor.

- Our Code of Conduct requires all employees to observe all applicable laws including those regarding modern slavery and human trafficking and requires all employees to treat one another with dignity and respect.
- Our Supplier Code of Conduct requires all of our suppliers and vendors to reject modern slavery, human trafficking, and exploiting child labor.
- Our Social Responsibility policy which condemns the use of forced labor and exploitative child labor.

4. Risk Assessment and Management; Due diligence processes

We believe there is a minimal risk of causing, contributing or being directly linked to instances of modern slavery within our operation. Despite this belief, however we take great efforts to identify, prevent and mitigate the risk of modern slavery both within Sensia and downstream in our supply chain. Sensia's suppliers are subject to routine due diligence and self-assessments to identify their efforts to mitigate modern slavery risk. 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 such a risk is ever discovered it will be documented and remediated.

As part of our due diligence efforts we routinely analyze applicable laws in the countries in which we do work in to ensure that we are complying with their regulations and ensuring that our policies are in line with them.

5. Key performance indicators to measure effectiveness of steps being taken, Training

During fiscal year 2024, 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:

Employee training on Sensia's Code of Conduct and Commitment to ethically sourcing labor.	Our employees received our Annual Ethics Training and reaffirmed their commitment to our Code of Conduct.
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 related to modern slavery or human trafficking reported to Human Resources, Internal Controls or Sourcing (audits), any manager or Company lawyer	There were no verified modern slavery or human trafficking issues reported during FY24.

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.
- Continue monitoring global regulations to combat modern slavery.

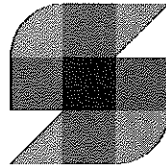
EXHIBIT LIST

Sensia Code of Conduct

Sensia Supply Chain Code of Conduct

Sensia Social Responsibility Policy

SENSIA CODE OF CONDUCT



1 March 2024



Dear Fellow Employee:

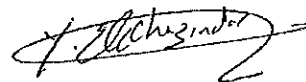
Integrity is a core company value at Sensia. It is embedded in everything we do, from how we work together, to how we buy and sell to our day-to-day business dealings. This principle applies to our relationships with customers, suppliers, governments, and employees. We must strive to succeed in all our business endeavors, but never at the expense of our ethical standards.

Acting with Integrity means:

- We are open, honest, ethical, and fair. When faced with difficult decisions, we do the right thing
- We're proud of our team diversity and inclusive work environments
- We challenge unethical conduct
- We protect employees, support local communities, and minimize the impact of our activities on the surrounding environment
- We trust each other and invite trust from those around us

This Code of Conduct can help all of us make the right choices when questions concerning proper business conduct arise. It's available on our OneSensia intranet. If an issue arises that this Code of Conduct cannot help you answer, or if you know of or believe there might be a violation of law or company policies, talk to your manager, another member of management, Human Resources, or the General Counsel. I encourage all Sensia employees to speak up when they have a concern.

Sensia's reputation for ethics is only as good as the decisions we make every day. Thank you for your commitment to Sensia's success. Sincerely,



Yasser El-Khazindar
Chief Executive Officer, Sensia

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1 Ethics Is Good Business

The Sensia Way

Sensia's policy is to conduct its business in accordance with all applicable laws and with the highest standards of business conduct.

Why It's Our Way

We want to be respected for honesty and unquestioned integrity. Our continued business success depends on our customers and shareowners recognizing these qualities as Sensia hallmarks. Even a perception that a Sensia employee has acted unethically can damage the company's reputation.

FAQs

Q: I do my job, and I follow the rules. Frankly, I think we're all ethical employees. Why is Sensia reminding us to be ethical? Does someone think we're not?

A: Not at all. But it is important to continuously remind ourselves just how critical it is to our success that all of us, from our CEO down, act in accordance with the company's policies and applicable laws. We are all under pressure to get the job done – in the face of those pressures, we must remember we will never cut corners, ignore company policies, or violate applicable laws. Be familiar with the policies and laws that apply to your job, and if you don't know or are unsure, ask.

Q: Does this Code of Conduct apply to every Sensia employee worldwide?

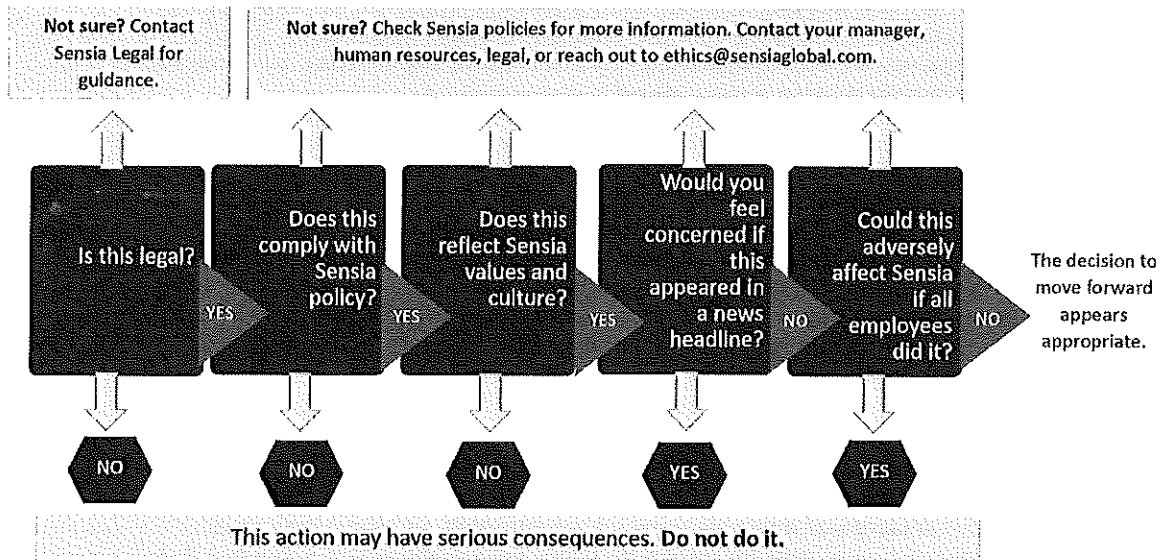
A: Yes.

Q: Are ethics, standards of business conduct and compliance American concepts?

A: No. Every country has laws, and all of our employees are subject to company policies everywhere we do business. It is part of our commitment as a company to know what laws, standards and policies apply to us and to live by them, and to uphold the highest ethical standards. Ethics, standards of business conduct and compliance are not about one country, but about how we run our business globally.

2 Ethics Decision Tree

When facing a tough ethical decision, ask yourself:





3 Problem Reporting and Resolution

The Sensia Way

If you have knowledge of any activity that is or might be a violation of the company's standards of business conduct, you must report that activity promptly to your supervisor, management, or the General Counsel. Harassment of, or retaliation against, an employee for making a disclosure is prohibited by company policy. Deliberately making a false report is also prohibited.

Why It's Our Way

Sensia employees must conduct all business activities in a way that is consistent with the company's standards of business conduct. Unethical behavior is wrong and can damage the company. In our transparent and digitally-connected world, information about bad acts often becomes public and will be learned by customers, regulators and others. Employees are urged to seek answers or clarification if there is any doubt or "gray" areas.

Unfortunately, rules are sometimes broken. The company must know about these violations so prompt and appropriate action may be taken. To help ensure that the company's standards of business conduct are enforced, all employees must understand and accept their obligation to report any violations and know that they can do so in confidence and without fear of retaliation. Reports to the General Counsel may be made anonymously by phone, fax, regular mail or e-mail (Remember, if you e-mail the General Counsel from your company e-mail account, the General Counsel will see your name).

FAQs

Q: I know of a violation of company policy related to standards of business conduct. Do I have to report it?

A: You are required to disclose the violation as soon as possible to an appropriate authority – your supervisor or other member of management, or the General Counsel.

Q: If I identify myself when I contact the General Counsel, who will be told that I did so?

A: We are serious about protecting confidentiality. You need not give your name. If you tell the General Counsel that you want your name held in confidence, the General Counsel will do so to the greatest extent possible.

Q: What can I do if I think someone is retaliating against me for reporting a concern?

A: Report it to HR or the General Counsel immediately. Retaliation is a violation of company policy, and appropriate action will be taken to stop the retaliation and prevent future occurrences.



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Q: I reported an incident. The person I was concerned about is still working here. Why wasn't I told what happened?

A: When the investigation resulting from a report to the General Counsel is completed, appropriate corrective action is taken. If you want to be informed of the results of an investigation, you should make your desire known when you report the matter. Please be aware, however, that the specifics of employee discipline are usually confidential.

4 Conflicts of Interest

The Sensia Way

All employees must conduct themselves with the highest standards of integrity, honesty and fairness to avoid any conflict between their personal interests and the interests of the company. No employee, or member of the employee's immediate family, may be involved in any business that competes with Sensia or does business with Sensia unless the involvement is disclosed and approved as required by our company policy on "Conflicts of Interest." It's important to know that a conflict of interest can also arise in situations that do not involve an immediate family member.

Why It's Our Way

We must always ensure all aspects of the Company's business are transparent and based on value to the Company. If you act in a way that favors you, a relative, a friend or another business more than the Company, then this can lead to a lack of value for our customers, other employees and other stakeholders.

FAQs

Q: How do I know if I have a reportable conflict of interest?

A: You need to report a potential conflict of interest if you or a member of your immediate family has any direct or indirect interest in, renders any service to, or is otherwise involved with any competitor, supplier or customer. You also need to report any potential conflict of interest because of a personal relationship you have with another person (for example, because of a promotion your best friend now reports to you).

Q: How do I report a potential conflict?

A: Use the [disclosure form](#) found on OneSensia / Legal / Key Policies.

Q: What is meant by "immediate" family?

A: An employee's spouse, children, parents, brothers and sisters. And remember – just because no "immediate family member" is involved does not mean that there is no reportable conflict.

Q: What is wrong with having a relative who works for a customer or supplier?

A: In most cases, nothing — but the company needs to know about it so appropriate action can be taken to protect potential conflicts from affecting, or appearing to affect, Sensia decisions. For example, if your son sells for a supplier and the company is aware of this relationship, you cannot be involved in the selection process for this supplier. It's important to know that a conflict



of interest can also arise in situations that do not involve an immediate family member. For example, if your best friend works for a supplier, you must disclose this conflict to the company before you participate in the selection process.

Q: I am a programmer familiar with a software package developed by one of our suppliers. A problem has been discovered in the software that is adversely affecting productivity. The supplier has asked me to work for him on a short-term contract to find and correct the problem. May I accept the offer?

A: This is a potential conflict of interest that you must report, and you will need to obtain approval before you accept. In this instance, approval might be denied because you could now have an interest in the "fix" — and that might impact your evaluation as an employee.

Q: My mother owns a machine repair shop and believes her shop can provide better service, price, and repair time than our current supplier. Can she be put on our "bidders" list?

A: Yes, but you must disclose the relationship and relevant facts. If you are in a position to influence the selection process, it is unlikely that your mother will be placed on the "bidders" list.

Q: I am a manager and I have just started dating a direct report. The relationship is totally consensual, so there's no problem, is there?

A: Yes there is! You have a conflict of interest because you can no longer be objective in evaluating your direct report's performance, be fair in giving out assignments, etc. — and even if you could still be objective, you cannot avoid the appearance of a conflict of interest. You must report your relationship to the company immediately so that the company has the opportunity to address the conflict appropriately.



5 Anti-Corruption and Giving/Receiving Gifts and Entertainment

The Sensia Way

Sensia and its employees and representatives must conduct business with customers, subcontractors, suppliers, distributors and others on the basis of service, quality, performance and price without giving or accepting anything of value that could influence or appear to influence the outcome of a transaction.

Why It's Our Way

Sales, purchases and other business decisions must not be influenced or appear to be influenced by the personal considerations of employees. Further, we do not want to do anything that might cause others to violate the law or the policies of their employer. And of course, we must always comply with applicable laws. Remember – bribery is illegal in every country and often includes gifts and payments that some people think are customary.

FAQs

Q: Does this mean I can never accept a gift from a business contact?

A: No. Exchanging modest gifts is usually acceptable. You can find guidelines on appropriate gifts and entertainment at OneSensia / Legal / Key Policies. Unless your business, region or function has established a more restrictive policy, company policy permits employees to accept gifts of modest value, consistent with generally accepted ethical and legal business practices. The value of these gifts, however, may not exceed USD\$250 for any employee in any year from any source. And cash or cash equivalent gifts (like gift cards) are not permitted.

Q: What is a business courtesy? May I give or accept business courtesies?

A: Business courtesies are accommodations such as meals, refreshments, entertainment, transportation or lodging either given or received in connection with marketing, product information, procurement or public relations activities. It is generally appropriate to give or accept business courtesies as long as it supports the company's legitimate business interests and is reasonable and appropriate under the circumstances. For example, taking a customer out to dinner at the end of a day of business meetings is usually appropriate; but it usually would not be appropriate to order a USD\$200 bottle of wine! And, if the customer is a government employee or an employee of a state-owned business, special rules may apply. Check with your manager before offering business courtesies for government employees or employees of a state-owned business.

Q: What should I do if I'm offered an inappropriate gift such as a weekend vacation? Refusing it could embarrass the giver.

A: Tell the giver that accepting the gift violates company policy. You could also say that the company wishes to avoid any suggestion of impropriety. It may be appropriate to acquaint your customers and suppliers with Sensia's policies prior to holidays or other events where a gift customarily might be presented.

Q: What should I do if a government official gives me an expensive gift?

A: Where the return of the gift may be interpreted as an insult because of local business customs, the gift should be accepted and acknowledged, but referred to the Sensia Chief Financial Officer and to the General Counsel for disposition.

Q: If I am invited to lunch or dinner while on a business trip to a supplier's plant, may I accept?

A: You may accept when the meal is part of, or a logical conclusion to, a meeting. However, the meal should not be extravagant.

Q: Can we offer government employees, or employees of state-owned businesses, meals and other non-monetary gifts or business courtesies?

A: As a general rule, it is best to follow a basic policy of not providing gifts or business courtesies to government employees or employees of state-owned businesses. In some instances, it may be appropriate to give company-logo or sales promotion items – check with your manager or the Legal Department. Similarly, it may be appropriate to provide a meal to a government employee, or an employee of a state-owned business, if the meal is a working lunch or immediately follows (and is an extension of) a business meeting. Again, check with your manager or the Legal Department.

Q: One of our sales agents has offered to take care of getting certain government permits we need to sell certain products. At the same time, the distributor has requested a \$40,000 price break to "help move the process along." Because we really don't know where the money is going, do we have to worry about it, or is that the distributor's problem?

A: Worry! You must know where the money is going and for what purpose it is being used. You must also account for it accurately. Moreover, the company is required to take steps to ensure that this money is not used as a bribe. And remember – if you can't do it directly, you can't do it indirectly either, such as through a sales agent or any other representative. You must seek the advice of your manager, the Finance Department or the Legal Department.

Q: In some countries, personal gifts are regarded as common courtesy. Does our policy prevent such gifts?

A: It depends on the circumstances. You need to check if the gift is proper under the laws and customs of the recipient's country. In addition, gifts with a value of more than U.S. \$250 to government officials, including employees of state-owned businesses, must first be approved by a Vice President with advice from the Legal Department.



Q: In some countries, cash has to change hands before government clerks will perform certain routine duties. Are such payments forbidden?

A: Yes! Such payments are forbidden under company policy unless your safety is involved. If you make such a payment because you fear for your safety, you must immediately report the payment to your manager and to the Legal Department.

Q: Can we pay the cost of customers to travel to meetings or events?

A: Generally, yes. Of course, the travel has to be for a legitimate business purpose and cannot be merely a gift or a gratuity. And the travel has to be approved at appropriate levels within the company. Remember – different rules apply if the customer is a government official or the employee of a state-owned business. If you have questions about the appropriateness of paying for customer travel, ask your manager, the Finance Department or the Legal Department.

Q: Is it okay for Sensia to hire consultants or agents to help us get an order?

A: Yes, but only in compliance with the very strict requirements contained in Sensia's Market Access Procedure. And remember – you cannot use a consultant or agent to do something that you cannot lawfully do yourself.



6 Accurate Books and Records

The Sensia Way

No false, misleading or artificial entries may be made in the books and records of the company. Records and books must be maintained in accordance with good accounting practice and all laws and regulations. All costs must be accurately and completely recorded in an auditable manner.

Why It's Our Way

Sensia has a responsibility to our shareholders, employees, customers and suppliers, and to the communities in which we live and work. There can be no compromise in the maintenance of our books and records. Our customers expect Sensia products to be priced fairly and all charges to be applied accurately. Accuracy of the company's books and records begins with each of us. Whether the records are timecards, expense reports, general accounting records, or purchasing or manufacturing records, each of us has a personal responsibility to ensure that every document is complete and accurate.

FAQs

Q: It is the last week in the quarterly reporting period. My boss wants to make sure we meet our numbers for the quarter, so he asked me to book a sale now that won't be finalized until next week. I guess this won't hurt anyone – should I do what he says?

A: No! Costs and revenues must be recorded in the right time periods. The sale has not officially been completed until there is evidence of a sales agreement, title has passed, and the sales price can be determined and is reasonably collectible. Usually, revenue cannot be recognized until the product is delivered or the services are performed. Until then, it would be a misrepresentation to include it in an earlier period.

Q: Must I have a receipt for all business expenses?

A: It is a good idea to ask for a receipt for any business expense, and receipts are required for certain expenses.

Q: If I take a personal trip at the end of a business trip, what expenses may I claim?

A: The company will reimburse you for only those expenses associated with your business trip in accordance with established policy. You will be responsible for all incremental costs such as transportation, lodging and meals.

Q: One of our auditors has asked me a question at a time when I am very busy. I am 80% sure of the answer but to be completely sure I will do some additional research. If I give the auditor



the answer without qualifying it, I think she will be satisfied and move on, allowing me to get back to work. Can I just tell her what I think the answer is, or should I tell her what I think the answer is but that I am only 80% sure?

A: To cooperate fully, you must tell the auditor that you are only 80% sure of the answer and perform additional research if the auditor requires it.

Q: If I record the correct amount of an expense, does it matter how I describe the expense?

A: Yes. It violates company policy and potentially the law to describe things inaccurately in our books and records. For example, do not describe customer entertainment expenses as "marketing expenses."

7 Using Company Resources

The Sensia Way

Company resources, and the property and technology of customers, subcontractors and suppliers (e.g., technical data, patents, software and materials), may not be taken, used, altered or destroyed without proper authorization.

Why It's Our Way

Sensia's continued success depends on the effective use of available resources. Using resources for non-business purposes may reduce profit to our shareholders or increase prices to our customers, resulting in less business and fewer jobs.

FAQs

Q: I am taking college courses and want to use company-owned computer software on my home computer for homework. May I do so?

A: Sensia encourages continuous learning by our employees, but not at the expense of ethical and sound business practices. Using company-owned software on your home computer, therefore, depends on the licensing agreement between Sensia and the software supplier. Because unauthorized use of company-owned software is not allowed, you should first check with your supervisor and then seek guidance from our Information Technology department.

Q: I am an engineer and have developed some unique manufacturing systems software in connection with a company research project I'm working on. The software is now being used throughout the company. Because I developed the software, may I try to market it?

A: No. Because you developed the software as part of your Sensia responsibilities, it is company property and may not be sold or disclosed to others without appropriate management and Legal Department authorization.

Q: May I give my stockbroker a list of phone numbers of Sensia employees?

A: No. That information is for internal use and distribution only.

Q: Over the years, I have developed a file containing documents relevant to my job, including policies, procedures, organization charts, correspondence, briefing charts, product information, and customer and supplier contacts. Because I developed the file as my own reference data, may I take it with me if I leave the company?

A: No. Company data belongs to the company. Because you developed it in connection with your job, it is not your personal property.



Q: I have been given data by a supplier. Are there any special rules I have to follow to protect it?

A: In general, it is company policy to protect the data given to us by suppliers and customers to the same extent we protect our own. In addition, sometimes the company will have a contract, Non-Disclosure Agreement (NDA), or other special legal obligation regarding others' data. If you have any questions about the use and protection of data, ask your manager or the General Counsel.

8 Protecting Trade Secrets and Intellectual Property

The Sensia Way

Information that is not public, whether it is sensitive Sensia information, sensitive information received from a third party, or government classified information, may not be disclosed except as authorized. Employees must be familiar with established policies and procedures that govern the protection of sensitive, proprietary, confidential and classified information. If governing laws are violated, the company and the person or persons involved in the violation could face substantial fines and imprisonment.

Why It's Our Way

Employees may work on projects that involve information protected by export regulations, trade secret laws, copyright laws or the provisions of confidentiality agreements. Most employees come into contact with information or processes that give Sensia a competitive edge or involve matters of personal privacy. Unauthorized disclosure of company-sensitive information, or unauthorized possession or use of someone else's sensitive information, could compromise customer trust in Rockwell Automation. It may also be a crime.

FAQs

Q: Because of my relevant expertise, I have been asked to be an expert witness in a litigation not involving the company. I believe that I can perform the services requested without having to disclose any company sensitive information. May I do this?

A: Probably not. You must contact the General Counsel to discuss and obtain prior approval.

Q: I have decided to leave my employment with the company. While I worked here, I developed and gave several presentations about projects I worked on. Is it okay for me to take those presentations with me when I leave?

A: No. All work you produce as an employee is property of the company. If there is personal information on your computer that you want to take, discuss it with your manager or Human Resources and get permission.

Q: During my employment with the company I have invented technology that is not currently being used by the company. If the company is not interested in the technology am I free to exploit it myself?

A: No. All work you produce as an employee is property of the company, including any technology you invented. In appropriate instances the company may permit employees to use technology it owns. Each request is evaluated and requires the prior approval of the relevant business and the General Counsel.



Q: Sensia is in competition with my former employer for a major contract award. A pricing system I developed when I worked for that company is still being used today. If I share the information I have with my new boss, Sensia will have a clear advantage. Would this present a problem for me or Rockwell Automation?

A: Yes! Your former company's pricing system is probably considered proprietary by that company, and you have an obligation to your former employer not to disclose such information.

Q: A consultant has offered me information about a competitor's bid on a customer project. Should I accept that information?

A: No. To do so may violate the law. Notify the General Counsel immediately.

Q: I occasionally need to share sensitive company information with customers, suppliers, vendors and others who are not employees of the company. What should I be doing to protect this sensitive company information?

A: Determine whether there is a confidentiality agreement in place with the third party. The Contracts & Negotiations group can assist you. You also should place an appropriate legend (for example, Sensia Confidential) on any sensitive company documents transmitted outside the company.

Q: May I give my computer password to my administrative assistant or co-worker so they can log on to my account and help me with some work?

A: No. Sharing your password with another person jeopardizes sensitive information. In addition, new business processes will increasingly call for you to grant authorizations and approvals from your computer, and your signature authority can be compromised when you let someone else use your account.

9 Export Controls

The Sensia Way

As a global company, we respect applicable governmental rules and regulations wherever Sensia conducts business.

Why It's Our Way

Certain licenses or other government approvals may be required to "export" Sensia's products, services or technical data. U.S. export regulations control exports from the U.S. to other countries, sales to citizens of other countries in the U.S. and resale of certain products by Sensia distributors. Employees involved in the export of technical data and products must understand and fully comply with governing rules and regulations.

FAQs

Q: While I am in Paris for a technical meeting, I plan to contact several companies to discuss Sensia products and capabilities and to review with them the technical specifications and drawings. Do I need special approvals to have these discussions?

A: You should contact the Legal Department to determine if an export license or other government approvals are required to discuss the data.

Q: May I e-mail technical data to a business associate in another country? May I hand-carry technical data to another country?

A: It depends on the person, technical data and country. An export license may be required, even if the technical data is to be sent to a Sensia employee of a subsidiary in another country. Further, export regulations prohibit exports to certain persons and/or countries on "prohibited" lists. Check with the Legal Department to determine specific export requirements.

Q: The laws covering the export of technical data only cover sending technical data out of the country, right?

A: Wrong! Providing certain technical data to a foreign national may be prohibited even if the data never leaves the country, and even if the foreign national is a company employee working in the country where the data originates. Check with the Legal Department.

Q: A prospective customer from another country will visit one of our U.S. plants next week for a briefing on our product and technical capabilities. She will not be given any copies of charts or other written technical data, so I assume there isn't any potential export control issue. Am I correct?

A: No. If a particular technology transfer is subject to export controls, it does not matter whether the transfer occurs in the U.S. or in another country, nor does it matter whether the data is communicated verbally, visually, written or in hardware form

10 Competition and Antitrust

The Sensia Way

We must comply with all applicable laws regulating competition. Agreements between competitors regarding prices or sharing of markets and customers and similar arrangements affecting competition are prohibited under these laws and regulations.

Why It's Our Way

It is Sensia policy and good business to obey the laws of every country where we do business.

FAQs

Q: We want to enter into a teaming agreement with one of our competitors to bid on a major systems contract in another country. The agreement would provide for the exchange of technical data and pricing information with our team member. Would sharing this information be a violation of antitrust laws?

A: Before beginning discussions with a competitor regarding a proposed agreement, the information must be reviewed by the Legal Department.

Q: After a trade association meeting, representatives of several competing companies often get together to socialize. If one of the representatives asks the others to review her company's pricing policies, is there any problem?

A: Yes. No matter how informal, agreements among competitors to fix prices (i.e., to adopt similar prices) are illegal under antitrust laws. Even if there were no such agreement, it might look that way if the discussion of prices was followed by similar pricing actions. Let the representative know that it is against Sensia policy to discuss prices with competitors and immediately leave the room. A better approach would be to avoid such conversations entirely.

Q: A company reseller has requested a special price to meet a local competitive situation. We want to grant the special price, but only on the condition that the reseller gives a specific price to its customer. Is this okay to do?

A: Normally, no. Current company pricing policies do not permit an agreement with its reseller on what the reseller's price will be, known as resale price maintenance, because these arrangements may violate the antitrust laws. Consult the General Counsel if there is a need to influence a reseller's resale prices.



11 Employee Safety and Respect for the Environment

The Sensia Way

Sensia seeks to reduce, minimize or eliminate the generation of waste or the release of potentially hazardous materials into the environment. We also seek in general to prevent adverse impact on the environment and on the health and safety of our employees and communities as a result of our operations; and to recognize and respond to community concerns. Sensia wants to create a corporate culture in which environmental concerns are recognized as priority considerations in all our decisions. All Sensia operations must comply with governing environmental and safety laws and regulations.

Why It's Our Way

Failure to conduct operations properly can have serious and damaging consequences for our employees, neighbors, customers and shareowners. We owe it to ourselves and our co-workers to avoid injuries and follow safety rules and regulations. Similarly, the potential risk of even minimal exposure to various substances has focused public and political attention on environmental issues. Following waste disposal procedures and other safe environmental practices is required by our policies and applicable laws, but it is also the right thing to do for our neighbors. Sensia has pledged to ensure that our company, employees and communities are not exposed to environmental and safety risks.

FAQs

Q: I saw a coworker driving a forklift truck without wearing her seatbelt, after my supervisor told me that seatbelts must be used at all times. What should I do?

A: If you are comfortable talking directly to your coworker to remind her that seatbelts are required, do it. Otherwise, tell your supervisor or human resources.

Q: A permit to store a hazardous substance has expired. We know that the permitting agency will give us a new permit, but we want to wait until we move to another facility next month. May we wait to obtain the storage permit?

A: No. Although this situation might be viewed as only a "technical" violation, you must obtain a permit immediately.

Q: Environmental law is complex and changes frequently, and the penalties for violations are high. How am I supposed to know what laws and regulations apply to me?

A: Each location or plant has employees who ensure compliance with governing environmental laws and regulations, and who know where to obtain clarification on unusual situations. If you are unsure of what laws or regulations might apply in a given situation, discuss your concern with your supervisor or Sensia's HQ Health, Safety & Environment department.



Q: Two scientists are working in a lab on a project involving the use of a nitric acid solution, a regulated hazardous material. During the test, several gallons of diluted acid are spilled onto the floor and flow into the floor drain. Neither scientist is injured. What should be done?

A: Any employee becoming aware of a hazardous material spill must immediately report the incident to the facility emergency organization. Certain hazardous material spills must be reported to environmental agencies. Concealing a spill violates policy and may violate the law.

Q: A facilities engineer asked a plumber to replace some rusty pipes. In order to get to them, some walls that are known to contain asbestos must be torn down. What should be done about the asbestos?

A: The facilities staff must tell the plumber and any nearby employees about the asbestos. Demolition work involving asbestos must be done by a properly licensed person.

Sensia wants to create a corporate culture in which environmental concerns are recognized as priority considerations in all our decisions.



12 Respect and Concern for Each Other

The Sensia Way

Sensia will not tolerate discrimination, harassment, or physical or verbal threats, all of which deny employees the opportunity to contribute to the best of their abilities and deprive the company of their full talents.

Why It's Our Way

Integrating the unique attributes and talents of a diverse workforce produces better results. Preventing harassment, discrimination and threats is a matter of respecting each other's rights and dignity, which is a basic value at Rockwell Automation. Sensia employees and business associates are entitled to conduct their business in a work environment free of these distractions.

FAQs

Q: What is sexual harassment?

A: Sexual harassment involves unwelcome sexual advances, requests for sexual favors, or physical conduct of a sexual nature. It can also involve other conduct of a sexual nature, including verbal conduct, which creates a hostile or offensive working environment.

Q: I overheard a manager say he would not promote a particular individual because the person is a different race. He also used a racial slur about that person. What should I do?

A: Take immediate action. Discrimination is not right and it is against company policy. Race must never be a factor in making a personnel decision. Contact the manager's supervisor, Human Resources or the General Counsel to report your comments.

Q: I have a disability. Am I entitled to accommodations to enable me to perform my job?

A: It is Sensia policy to make reasonable accommodation for employees with disabilities. You and your supervisor should ask Human Resources and/or Facilities to discuss appropriate accommodations.

Q: One of my coworkers has a temper and often uses threatening and abusive language with others. I'm concerned about working near him, and I don't know what to do about it.

A: Report your observations and concerns to your supervisor, Human Resources, or the General Counsel.



Q: A recently terminated employee has been in the parking lot several times telling former coworkers of his intent to “get even” for being terminated. Should I do something?

A: Yes! The situation could be an indication of potential violent behavior and should be reported to your supervisor, Security, Human Resources or the General Counsel immediately.

13 Reporting Concerns

Answers to legal or ethical issues are not always clear cut. As a Sensia employee or person who works for or on behalf of the Company, you are not expected to know all the answers. You are expected to ask questions when you are in doubt. If you have a question or want to report a specific concern that is related to ethics or compliance, contact your manager, another member of management, Human Resources, or the General Counsel. We urge you to ask questions and report concerns, and you can do so without fear of retaliation.

You Can Contact Management

In most cases, your manager should be your first step for any questions and conversation. Your manager is expected to lead the work of your team, to know you and your team and to set expectations for performance and behavior. You can also escalate questions, concerns or have conversations with your next level manager, or other managers and leaders outside of your reporting structure.

You Can Contact Human Resources (HR)

Human Resources (HR) is a global function that creates, delivers and supports people programs – so you can succeed in your work and career. They are also a good contact when you are not comfortable raising a concern with your manager. See OneSensia / Human Resources.

You Can Contact the General Counsel

There are unique times where you may want to seek advice or counsel anonymously and confidentially, or to report a serious legal or ethical matter. You can contact the General Counsel directly on these issues or to report potential violations of our Code of Conduct. See OneSensia / Legal for direct contact information or use one of the contact methods below:

Email: ethics@sensiaglobal.com
External Mail: Sensia General Counsel
Sensia LLC
11750 Katy Freeway, Floor 15
Houston, Texas 77079 USA

You Can Contact a Parent Company

Sensia's parent companies, Rockwell Automation and Schlumberger, enjoy a strong reputation for ethics and integrity. Sensia employees can also report a legal or ethical concern to Rockwell Automation or Schlumberger by using one of these links:

[Rockwell Automation Ombudsman](#)

[Schlumberger Ethics Line](#)

SENSIA SUPPLIER CODE OF CONDUCT

- Sensia believes in: (i) conducting business with honesty and integrity and in accordance with all laws and regulations; (ii) worker safety; and, (iii) environmental and social responsibility. Therefore, all Sensia suppliers must abide by the standards set forth in this Supplier Code of Conduct.
 - The Code is made up of the following five sections: Labor; Health and Safety; the Environment; Business Ethics; and, Management System.
-

LABOR

All suppliers must meet the following minimum recognized labor standards and uphold the human rights of workers, treating them with dignity and respect as understood by the international community. This applies to all workers including temporary, migrant, student, contract, and direct employees.

- **Freely chosen employment.** You must not use forced, bonded (including debt bondage) or indentured labor, involuntary prison labor, or slave labor. You also must not engage in human trafficking, including transporting, harboring, recruiting, transferring or receiving vulnerable persons by means of threat, force, coercion, abduction or fraud for the purpose of exploitation. All work must be voluntary and workers shall be free to leave work at any time or terminate their employment. Workers must not be required to surrender any government-issued identification, passports, or work permits as a condition of employment. All fees charged to workers must be disclosed and must not be excessive.
- **Child labor avoidance.** You must not use child labor in any stage of manufacturing. The term "child" refers to any person under the age of 15 (or 14 where the law of the country permits), or under the age for completing compulsory education, or under the minimum age for employment in the country, whichever is the most proscriptive. We support legitimate workplace apprenticeship programs that comply with all applicable laws and regulations. Workers under the age of 18 shall not perform work that is likely to jeopardize their health or safety.
- **Working hours.** Work weeks must not exceed the maximum set by local law. Further, except in emergency or unusual situations, a workweek must not be more than 60 hours per week and workers must be allowed at least one day off per seven-day week.

- **Wages and Benefits.** Compensation paid to workers must comply with all applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits. In compliance with local laws, you must compensate workers for overtime at pay rates greater than regular hourly rates. You must not deduct wages as a disciplinary measure. You must supply workers with basic wage information in a timely manner via pay stub or similar documentation.
- **Humane treatment.** There must be no harsh and inhumane treatment including any sexual harassment, sexual abuse, corporal punishment, mental or physical coercion or verbal abuse of workers; nor is there to be the threat of any such treatment. Disciplinary policies and procedures in support of these requirements must be clearly defined and communicated to workers.
- **Non-discrimination.** You must not unlawfully harass or discriminate against workers. You must not discriminate based on race, color, age, gender, sexual orientation, ethnicity, disability, pregnancy, religion, political affiliation, union membership or marital status in hiring and employment practices such as promotions, rewards, and access to training. In addition, you must not use medical tests to unlawfully discriminate against workers or potential workers.
- **Freedom of association.** We believe that open communication and direct engagement between workers and management are the most effective ways to resolve workplace and compensation issues. You must respect the rights of workers to associate freely, join or not join labor unions, seek representation, and join workers' councils in accordance with local laws. You must permit workers to openly communicate and share grievances with management regarding working conditions and management practices without fear of reprisal, intimidation or harassment.

HEALTH and SAFETY

All Sensia suppliers must provide a safe and healthy work environment for workers and, at a minimum, satisfy the following standards:

- **Occupational safety.** You must control worker exposure to potential safety hazards (e.g., electrical and other energy sources, fire, vehicles, and fall hazards) through proper design, engineering and administrative controls, preventative maintenance, safe work procedures (including lockout/tag-out), and ongoing safety training. You must provide workers with appropriate, well-maintained, personal protective equipment when hazards cannot otherwise adequately be controlled by these other means. You must not discipline workers for raising safety concerns.
- **Emergency preparedness.** You must identify and assess potential emergency situations and events, and minimize their impact by implementing emergency plans and response procedures including: emergency reporting, worker notification and evacuation procedures, worker training and drills, appropriate fire detection and suppression equipment, adequate exit facilities and recovery plans.

- **Occupational injury and illness.** You must put in place procedures and systems to prevent, manage, track and report occupational injury and illness, including provisions to: encourage worker reporting; classify and record injury and illness cases; provide necessary medical treatment; investigate cases and implement corrective actions to eliminate their causes; and facilitate return of workers to work.
- **Industrial hygiene.** You must identify, evaluate and control worker exposure to chemical, biological and physical agents and use engineering or administrative controls to control overexposures. When hazards cannot be adequately controlled by such means, you must protect worker health by appropriate personal protective equipment programs.
- **Physically demanding work.** You must identify, evaluate and control worker exposure to the hazards of physically demanding tasks, including manual material handling and heavy or repetitive lifting, prolonged standing and highly repetitive or forceful assembly tasks.
- **Machine safeguarding.** You must evaluate production and other machinery for safety hazards. You must provide and properly maintain physical guards, interlocks and barriers when machinery presents an injury hazard to workers.
- **Sanitation, Food, and Housing.** You must provide workers with ready access to clean toilet facilities, potable water and sanitary food preparation, storage, and eating facilities. Worker dormitories provided by you or a labor agent are to be maintained to be clean and safe, and provided with appropriate emergency egress, hot water for bathing and showering, adequate heat and ventilation, and reasonable personal space along with reasonable entry and exit privileges.

ENVIRONMENTAL

In manufacturing operations, you must minimize adverse effects on the community, environment and natural resources while safeguarding the health and safety of the public. Suppliers must meet the following environmental standards:

- **Environmental permits and reporting.** You must obtain, maintain and keep current all required environmental permits (e.g. discharge monitoring), approvals and registrations and follow their operational and reporting requirements.
- **Pollution prevention and resource reduction.** You must reduce or eliminate waste of all types, including water and energy, at the source or by practices such as modifying production, maintenance and facility processes, materials substitution, conservation, recycling and re-using materials.

- **Hazardous substances.** You must identify and manager chemicals and other materials posing a hazard if released to the environment to ensure their safe handling, movement, storage, use, recycling or reuse and disposal.
 - **Wastewater and Solid waste.** You must characterize, monitor, control and treat wastewater and solid waste generated from operations, industrial processes and sanitation facilities as required prior to discharge or disposal.
 - **Air emissions.** You must characterize, monitor, control and treat air emissions of volatile organic chemicals, aerosols, corrosives, particulates, ozone depleting chemicals and combustion by-products generated from operations as required prior to discharge.
 - **Product content restrictions.** You must adhere to all applicable laws, regulations and customer requirements regarding prohibition or restriction of specific substances, including labeling for recycling and disposal.
-

ETHICS

All Sensia suppliers and their agents must follow the highest standards of ethics including:

- **Business integrity.** You must maintain the highest standards of integrity in all business interactions. All of your business dealings should be transparently performed and you must accurately reflect them in your books and records.
- **No improper advantage.** You must not offer or accept bribes or other means of obtaining undue or improper advantage. You must implement monitoring and enforcement procedures to ensure compliance with applicable anti-corruption laws.
- **Disclosure of information.** You must disclose information regarding business activities, structure, financial situation and performance in accordance with applicable regulations and prevailing industry practices. Falsification of records or misrepresentation of conditions or practices in the supply chain is prohibited.
- **Intellectual property.** You must respect intellectual property rights; you must transfer technology and know-how in a manner that protects intellectual property rights.
- **Fair Business, Advertising and Competition.** You must uphold standards of fair business, advertising and competition.
- **Safeguarding our information.** You must use appropriate means to safeguard our information.
- **Responsible sourcing.** You must not incorporate materials, parts or services in materials, parts or services supplied to Sensia that would violate any law or regulation because of the origin of the material, part or service. You must have a policy to reasonably assure that the tantalum, tin, tungsten and gold in the products you

manufacture do not directly or indirectly finance or benefit armed groups that are perpetrators of serious human rights abuses in the Democratic Republic of the Congo or an adjoining country. You must exercise due diligence on the source and chain of custody of these minerals and make their due diligence measures available to customers upon customer request.

- **Privacy.** You must have reasonable safeguards to prevent exposure of the personal information of everyone you do business with, including other suppliers, customers, consumers and employees. You must also comply with privacy and information security laws and regulatory requirements when you collect, store, process, transmit, and share personal information.
- **Programs that enable reporting of concerns.** You must have a program that enables workers to report violations of the law or the policies set forth in this supplier code of conduct.
- **Non-retaliation.** You must have and have communicated to workers a process for them to raise any concerns without fear of retaliation.

MANAGEMENT SYSTEM

You must adopt or establish a management system designed to ensure that you:

- Comply with applicable laws, regulations and customer requirements related to your operations and products.
- Conform to this supplier code of conduct.
- Identify and mitigate operational risks related to this supplier code of conduct.
- That all of the suppliers you use in connection with providing goods or services to Sensia also adhere to the standards set forth in this supplier code of conduct, including an audit process to verify such compliance.



**SOCIAL RESPONSIBILTY AND
SUSTAINABILITY STANDARD 020**

Core Process	HSE
Document #	SEN-HSE-S020
Revision No.	Rev 001
Content Owner	Melissa Nandi
Reviewed by	Jamie Mott, Shawna Bohnke
Approved by	Jamie Mott

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1 Purpose

Sensia fundamentally believes in honesty, integrity, and good corporate citizenship. The Company is committed to "doing the right thing," protecting our Employees, supporting the local community, and minimizing the impact of their activities the communities in which employees work and live.

The Purpose of the Global Social Responsibility and Sustainability Standard is to build the fundamental knowledge of sustainability to address Sensia's goals and challenges.

2 Scope

This Standard applies to all Sensia Employees, customers, partners, suppliers, and shareholders.

3 Program

3.1 Key Principles

- We respect and support the dignity of all workers and our Company policies and practices are designed to uphold worker human rights.
- We embrace equal employment opportunities, reject illegal employment discrimination in any form and strive to treat all Employees with fairness and dignity.
- We are committed to demonstrating the highest standards of health and safety for our Employees and customers.
- We strive to continually improve our environmental performance including resource conservation and pollution prevention.
- We are committed to making a positive impact on the communities in which we live and work.
- We adhere to a Code of Conduct based on principles and laws that guide the decisions and actions of our Employees and suppliers.

3.2 Human Rights and our Relationship with our Employees

- We respect and support the dignity of all workers and our Company policies and practices are designed to uphold worker human rights. We condemn all forms of forced compulsory labor and exploitative child labor. Children must not be inhibited in their development; their health and safety must not be adversely affected; and their dignity must be respected.



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- We provide equal employment opportunities and prohibit illegal employment discrimination in any form. Specifically, employment discrimination based on gender, race, disability, national origin, religion, age, or sexual orientation is prohibited.
- We do not allow behavior, including gestures, language, and physical contact, that is sexually coercive, threatening, abusive or exploitative.
- We prohibit the use of corporal punishment, mental or physical coercion, and verbal abuse.
- We acknowledge the right of our Employees to form trade unions and to bargain collectively, subject to national statutory regulations and existing agreements.
 - Groups of Employees may communicate with management even in those countries in which freedom of association is not protected by law.
 - We deal with Employees, Employee representatives and trade unions constructively.
 - Even where there is disagreement, we always aim to work out a solution that permits constructive cooperation in the long term.
- We oppose all exploitative working conditions. Our Employees are able to communicate with management about working conditions without fear of reprisal, intimidation, or harassment.
- We are committed to compensating our Employees appropriately in each job market and we ensure that our compensation meets all legally established minimum wage requirements.
- We ensure that we meet all national provisions and agreements regarding working hours.
- We provide training to all of our Employees to meet regulatory compliance requirements, quality, and safety standards and to guide our decisions on matters of ethics and integrity.
- We provide leadership and competency opportunities to enable Employees to develop their careers.

3.3 Employee Health and Safety

- We are committed to complying with safety regulations and to demonstrating the highest standard of occupational safety and health performance.
 - The safety and health of our Employees is a primary concern and is managed in conjunction with all business processes.
 - Safety is an integral part of our operations and is the responsibility of all Employees.
 - We establish and monitor safety objectives and targets to drive continual improvement.



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- Our vision is to:
 - Strive for zero workplace injuries and illnesses;
 - Operate in a manner that recognizes safety as fundamental to being the best place to work;
 - Encourage and engage our Employees to participate in developing and maintaining exemplary health and safety management systems and performance;
 - Comply with all applicable occupational safety regulations and implement proactive best management practices;
 - We will follow standards based on United States models where there are no regulations or where the regulations are less restrictive;
 - Measure safety and health performance against appropriate targets for workplace injuries and illnesses; and,
 - Enable our customers to achieve both operational excellence and a safe working environment through our extensive portfolio of safety products, services, solutions, and expertise.

3.4 Environmental Responsibility

- We are committed to demonstrating the highest standard of environmental management.
 - Our policy is to go beyond strict regulatory compliance and to act in the interest of the communities in which we live and work.
 - We are committed to the continual improvement of our environmental management and performance, including resource conservation and pollution prevention.
 - We relentlessly strive to be the best in all aspects of environmental management by fostering a culture of trust, teamwork, accountability, partnership and communications with Employees, suppliers, customers and outside organizations.
- Our vision is to:
 - Comply with all applicable environmental and environmental product compliance regulations and implement proactive best management practices;
 - Where regulations do not exist, or are not protective, our facilities will follow standards based on United States models;
 - Reduce, minimize, or eliminate the generation of waste and the release of potentially hazardous materials to the environment;
 - Measure environmental performance against annual targets;
 - Make environmental protection and conservation of energy and raw materials priority considerations in evaluating new and existing



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products, land use decisions, process changes, material purchases, and business acquisitions and divestitures;

- Recognize and respond to community concerns about the environmental impact of our operations;
- Supply a portfolio of products, services and solutions that enable our customer's operations to be cleaner, safer, more resource efficient and ultimately more sustainable.

3.5 Ethics and Fair Competition

- We conduct our business in accordance with all applicable laws of the jurisdictions in which we operate and in accordance with our Code of Conduct.
- We respect intellectual and other property rights and we compete for business on the value and quality of our products, services, and solutions.
- As set out in our Anti-Corruption Policy, we prohibit bribes, kickbacks, or other illegal payments of any kind, including what are commonly known as facilitating payments.
- We maintain a world class ethics and compliance program that supports compliance with our policies, especially our Code of Conduct, and with regulations that apply to our business.
- We encourage our suppliers to maintain a vigorous ethics and compliance program and to adopt a similar approach to social and environmental responsibility. This expectation is defined in our Supplier Code of Conduct and is communicated to our global suppliers.

4 Implementation


- This policy is observed by all of our locations and Employees throughout the world.
- The senior managers of our Business Units, Regions and Functions, along with our Business Standards Compliance Committee, are responsible for ensuring compliance with this policy.
- Our General Counsel accepts and investigates allegations of non-compliance with this policy as well as allegations of other conduct that violates our Code of Conduct. The General Counsel will report any serious violations of this policy and the actions taken to correct any such violations to the Executive Committee, which will review whether the responsive actions taken were appropriate. Business partners, suppliers, customers, and Employees alike can contact the General Counsel to raise concerns that we are not satisfying this policy, or other ethics or Code of Conduct matters.



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- 5 Definitions
 - N/A
- 6 Responsibilities
 - N/A
- 7 Records
 - N/A
- 8 Reference
 - N/A
- 9 Appendix
 - None
- 10 Revision History

Revision	Date	Revised by	Description
001	February, 2020	Melissa Nandi, VP, General Counsel	Create
Approved by		Signature	Date
Jamie Mott, QHSE Director			Sept 21, 2020