

Emerson Code of Ethics for Business Partners

Emerson has a long and distinguished tradition of adherence to the highest ethical standards. Emerson intends to maintain these standards in all of its business dealings. They apply in the acquisition of new business, as well as to performance of contractual obligations. Improper activities could harm not only Emerson's good reputation, but also those of its Business Partners and also have other adverse consequences for Emerson, its employees and Business Partners. Even the appearance of impropriety could be extremely damaging.

The Code of Ethics for Business Partners ("Code") outlines Emerson's expectations regarding ethical and business standards. We require our Business Partners to adhere to this Code.

General Ethical Standards

Set out below are the general standards to be met by all Business Partners. However, these standards are not necessarily the only obligations that apply to Business Partners' conduct. In general, all Business Partners should take care to avoid any conduct that could reasonably appear to be improper or might damage Emerson's reputation for integrity in its activities.

1. Compliance with Laws, Rules and Regulations

Business Partners should operate in full compliance with the laws of their respective countries and with all other applicable laws, rules, and regulations. This should include, but is not limited to, applicable U.S. export control laws and regulations, as well as applicable laws of other countries.

2. Conflict of Interest

Any employee of a Business Partner who has a personal, business or financial interest that is incompatible with the loyalty and responsibility owed to Emerson should be reported to Emerson.

3. Equal Employment Opportunity, Anti-Harassment and Sexual Harassment

Business Partners should provide a workplace free of harassment and discrimination. Discrimination by reason of race, color, religion, gender, sexual orientation, age, disability, national origin, or any other factor made unlawful by applicable laws and regulations is not condoned.

4. Political Payments

Business Partners should not use any funds or assets to assist any candidate or nominee to gain political office, or to assist any political parties or committees generally, unless permitted by law and, if required, approved in advance by the relevant authorities.

5. Proprietary Data

Business Partners should take reasonable precautions to protect the confidentiality of Emerson's proprietary data and deal with them in accordance with any agreements concerning their use or disclosure.

6. Use of Personal Data

Business Partners should treat personal data of Emerson employees in accordance with applicable data protection laws and any other applicable laws, rules or regulations.

7. Insider Information and Securities Trading

Business Partners should not buy or sell Emerson stock or other Emerson securities, or direct someone else to buy or sell on their behalf or on behalf of other parties if they have knowledge of material inside information that has not been made public.

8. Antitrust / Competition Laws

Business Partners should comply with Antitrust/Competition Laws and should not enter into any understanding, agreement or plan, express or implied, formal or informal, written or oral, with a competitor with regard to prices, terms or conditions of sale or service, production, distribution, territories or customers. Business Partners should not exchange or discuss with a competitor prices, terms or conditions of sale or service, or other competitive information, or engage in any other conduct that violates any of these laws. If a Business Partner identifies what could be an antitrust/anticompetition problem, he should notify Emerson promptly.

9. Accounting Systems, Books and Records / Public Disclosure and Financial Reporting

Business Partners should comply with the bookkeeping, accounting, disclosure and reporting requirements of the respective countries and with all other applicable laws, rules, and regulations. No unrecorded off-the-books or “slush” funds or secret assets of any kind should be maintained for any purpose whatsoever.

10. Business Integrity

Any corruption, extortion and/or embezzlement is prohibited. Business Partners should not pay or accept bribes or participate in other illegal inducements in business or government relationships, and should comply with all applicable anti-corruption laws such as the Foreign Corrupt Practices Act and the UK Bribery Act. Gifts, for whatever reason, are discouraged.

11. Boycotts

Many countries prohibit companies from participating in economic boycotts against friendly countries. Detailed and complex regulations have been adopted that prohibit the taking of any action that may support a boycott. The regulations prohibit Emerson or any of its employees from refusing to do business with anyone based upon race, religion, gender or national origin, and from providing information concerning these matters to others. The regulations require that certain requests to participate in a boycott be reported to the government promptly. Business Partners should not ask Emerson or any of its employees to participate in such boycotts.

12. Health, Safety and Environment

Business Partners should be committed to compliance with all federal, state and local laws and regulations that apply to its operations, including those concerning health, safety and environment anywhere in the world.

Application to Sub-Contractors

This Code also applies to any sub-contractor(s) of a Business Partner, providing goods or services to that Business Partner. The Business Partner is fully responsible for ensuring compliance by any such sub-contractor(s) as if it/they were the Business Partner itself.

Consequences in case of non-compliance

If Emerson should become aware of any actions or conditions not in compliance with this Code, Emerson reserves the right to demand corrective measures. Emerson reserves the right to terminate an agreement with any Business Partner who does not comply with this Code.
