

Fighting Against Forced Labour and Child Labour in Supply Chains Act Statement

This statement is made pursuant to Fighting Against Forced Labour and Child Labour in Supply Chains Act (the “Act”), by Eaton Capital Unlimited Company, Eaton Holding IV S.à r.l., Eaton Industries (Canada) Company, Cooper Industries (Canada) Company, and Cooper Industries (Electrical) Inc. (collectively, the “Entities”) and covers the financial year of 1 January 2023 to 31 December 2023 (the “Period”).

The principal activities of **Eaton Capital Unlimited Company** involve the provision of financial and risk management services to various affiliates. This includes the carrying on of debt factoring activities, the provision of guarantee services to subsidiaries, and operating as a holding company.

The main activities of **Eaton Holding IV S.à r.l** is to invest, acquire and take participations and interest, in any form whatsoever, in any kind of Luxembourg or foreign companies or entities and to acquire through participations, contributions, purchases, options or in any other way any securities, rights, interests, patents and licenses, or other property as Eaton Holding IV S.à r.l shall determine, and generally to hold, manage, develop, encumber, sell or dispose of the same, in whole or in part, for such considerations as Eaton Holding IV S.à r.l determines.

Eaton Industries (Canada) Company, Cooper Industries (Canada) Company, and Cooper Industries (Electrical) Inc. are operating entities whose main activities are the manufacture, distribution, and sale of electrical distribution equipment and electrical products.

The Entities are controlled affiliates of the global Eaton group, the ultimate parent company of which is Eaton Corporation plc (referred to as “Eaton,” “the Company,” “we,” “us,” and “ours”).

Eaton issued an annual global statement for itself and on behalf of all its subsidiaries in compliance with the UK Modern Slavery Act 2015 and the California Transparency in Supply Chains Act of 2010. This statement is available here: [Slavery and human trafficking statement | Eaton](#).

As part of the Eaton group, the Entities share and follow the same key governance processes and policies, including Eaton’s Code of Ethics, Eaton’s Supplier Code of Conduct, and the same internal control framework, business, operations and supply chain systems and processes (including forced labour and child labour policy commitments and risk mitigation) as described in more detail below.

About Eaton

Eaton is an intelligent power management company with revenues of \$23.2 billion United States dollars reported in 2023. The Company is dedicated to protecting the environment and improving the quality of life for people everywhere. Eaton makes products for the data center, utility, industrial, commercial, machine building, residential, aerospace and mobility markets. Eaton has 5 key business segments: Electrical Americas, Electrical Global, Aerospace, Vehicle, and eMobility.

For additional information about our business segments and subsidiaries, including the wide variety of products manufactured in each segment, refer to Eaton's 2023 Form 10-K available at <https://www.eaton.com/us/en-us/company/investor-relations.html>.

Eaton Supply Chain Overview

Eaton has a substantial number of suppliers globally that span across our five business segments. Our supply chain is multi-tiered and the raw materials, parts and services that we purchase are varied and are sourced from approximately 50,000 suppliers across the globe supporting Eaton’s segment businesses.

Eaton actively seeks to do business with suppliers that are industry leaders, strategic partners and financially stable, and share Eaton's focus on doing business responsibly.

Powerful Purpose – Eaton's Policies and Governance Processes

At Eaton, we consider *how* we achieve our results an important measure of success. Doing Business Right is at the core of the Eaton brand. Eaton's financial success is tied directly to our long-standing commitment to the highest ethical standards. This commitment includes respecting human rights and requiring our suppliers to do the same. Eaton prohibits use of all forms of forced labour including modern slavery and human trafficking in its operations in any form and we do not employ child labour. An important part of this commitment is also ensuring that Eaton's suppliers and supply chain do not use forced labour or child labour, engage in modern slavery or human trafficking. Several key governance processes and supporting policies guide our actions accordingly.

Eaton Code of Ethics

Eaton's Code of Ethics ([Code of Ethics \(eaton.com\)](#)), which was refreshed in 2023, includes our fundamental principles to respect human rights and to protect human rights at all levels which we expect Eaton employees and our suppliers to honor. The Code of Ethics includes guidance on how these principles are integrated into our core values and day-to-day operations. Our Code of Ethics specifically prohibits Eaton and its suppliers from using forced labour of any kind. To demonstrate that Eaton's ethics standards are both current and at the highest level, Eaton has an established office to oversee and manage its ethics and compliance program. The office is under the direction of the Senior Vice President, Global Ethics and Compliance, with ultimate oversight by the Governance Committee of the Board of Directors.

Eaton Supplier Code of Conduct

Eaton's Supplier Code of Conduct ([Supplier code of conduct | Eaton](#)) sets forth minimum workplace standards and business practices that are expected of any Supplier doing business with Eaton, consistent with our company's values as documented in Eaton's Code of Ethics. These requirements are applicable to suppliers of Eaton and their affiliates and subsidiaries globally and include prohibitions on the use of forced labour, modern slavery, human trafficking, and child labour. Eaton suppliers are required to adhere to and certify compliance with the Supplier Code.

Eaton's Code of Ethics and Supplier Code of Conduct are integrated into policies, procedures and plans to ensure awareness and understanding of requirements. Implementation responsibilities are further addressed in various plans and guidance resources such as the Eaton Supplier Excellence Manual ([Eaton Global Supplier Excellence Manual.pdf](#)), and in the case of relevant US government contracting requirements, through a Trafficking in Persons - Compliance Plan, in accordance with Federal Acquisition Regulation human trafficking related requirements.

Eaton's Enterprise Risk Management (ERM) program is the Company's framework to identify, assess and mitigate the Company's risks. Eaton's leaders, business units, regions and corporate functions participate in identifying and assessing enterprise-level risks and opportunities. A wide range of risks faced by the Company are included in this risk assessment process, including human rights, modern slavery, forced labour, and child labour. Risks identified as "top risks" to the Company are assigned to a senior leader to be the "risk owner(s)." Risk owners are responsible for overseeing the development and execution of detailed mitigation plans and providing ongoing reporting to leadership. Other risks to the

Company not rising to the level of enterprise-level “top risks” are managed and mitigated under Eaton’s ERM program by the relevant function(s), region(s) and/or business unit(s).

Eaton continues to monitor on a global basis emerging risks including new laws, regulations and trade restrictions relating to forced labour, modern slavery, and human trafficking risks. As new information on emerging risks is identified Eaton reviews and adapts its processes accordingly to ensure these risks are being addressed within our program. Eaton is not aware of any instances of forced or child labour in its supply chain during the Period. Accordingly, we have not taken any remedial actions.

In support of Eaton’s policies, processes and procedures, we undertake specific actions to assess, prevent and mitigate the risk of forced labour, modern slavery, human trafficking, and child labour in our own business and supply chain, including:

1. Verification and Continuous Monitoring

Risks related to forced labour, including modern slavery, human trafficking, and child labour in Eaton’s supply chain are addressed through setting clear expectations for suppliers and ensuring conformance by Eaton suppliers with the Supplier Code of Conduct through inclusion of the Code of Conduct requirements in our standard terms and conditions. Suppliers are required to further separately review and affirm the requirements contained within Eaton’s Supplier Code of Conduct.

Eaton has established a Supplier Site Assessment (SSA) process to review supplier performance and practices. The SSA includes questions to evaluate whether a supplier has processes to address ethics & compliance-related issues.

Eaton further monitors publicly available information, as well as information from subscription services. In cases where we are alerted to a risk of non-compliance with Eaton’s Supplier Code of Conduct, we conduct an investigation and address such risk appropriately.

Eaton has established partnerships with non-governmental organizations and industry associations focused on supply chain human rights risks and leverages their comprehensive resources to support our human rights due diligence and capital practices.

Eaton continues to monitor on a global basis emerging risks including new laws, regulations and trade restrictions relating to forced labour, modern slavery, and human trafficking risks. As new information on emerging risks is identified Eaton reviews and adapts its processes accordingly to ensure these risks are being addressed within our program.

2. Supplier Audits

Under the terms of Eaton’s Supplier Code of Conduct, Eaton is permitted to audit its suppliers’ compliance with the Code and standard terms and conditions. In cases in which serious risks are presented, this audit may be immediate and unannounced. And while Eaton regularly audits its suppliers for a variety of reasons, typically those audits are not performed solely to determine compliance with the prohibition against forced labour, modern slavery or human trafficking. If necessary, Eaton may choose to engage third parties to evaluate compliance with our Code (including our prohibition on the use of forced labour, modern slavery, or human trafficking) and applicable labour laws. Eaton will promptly and thoroughly investigate any claims or indications that a supplier may be engaging in forced labour, modern slavery, or human trafficking, or use of child labour or is otherwise not complying with Eaton’s Code of Ethics or Supplier Code of Conduct.

3. Certification

Eaton's Supplier Code of Conduct states that suppliers must uphold the human rights of workers and treat them with dignity and respect. Suppliers must not use or engage in any indentured or forced labour, modern slavery or servitude, or human trafficking.

Under the Code, Suppliers' personnel and operations are required to operate in full compliance with the laws of their respective countries and with all other applicable laws, rules, and regulations. Suppliers must ensure that products, services and shipments for Eaton adhere to all applicable international trade compliance laws, rules, and regulations, and Eaton Supplier Code of Conduct requirements. Eaton requires its suppliers to certify compliance with the Supplier Code. In addition, Suppliers must contractually require their own suppliers and subcontractors to comply with standards of conduct equivalent to the provisions of Eaton's Supplier Code of Conduct.

4. Internal Accountability

Accountability related to human rights, forced labour, modern slavery and human trafficking risks is established by Eaton's Code of Ethics and Supplier Code of Conduct. In addition, Eaton has established rigorous governance and risk management processes in place to identify and mitigate a broad spectrum of supply chain risks.

Eaton has established various mechanisms, including a global Help Line ([Ethics and compliance | Ethical standards | Eaton](#)), for the reporting of any ethical concern or potential or actual legal violation. Any person, including employees and suppliers, may openly or anonymously ask a question or report through our Help Line or related means.

If we learn of any allegations of forced labour, slavery, trafficking or use of child labour through our Help Line or any other means, we will promptly investigate and act to remediate the situation, which could include necessary actions up to termination of involved parties. Claims made through our Help Line or Ethics Office are reported to the Governance Committee of Eaton's Board of Directors, along with the resolution of the claim and/or the findings of the investigation.

5. Training

As Ethics is a cornerstone of Eaton's values-based culture, all Eaton employees globally are trained annually with respect to expectations in Eaton's Code of Ethics. Historically, we have provided ongoing training to Supply Chain Management and other key Eaton executives engaged with Eaton's supply chain on protecting human rights. In 2022, we had expanded our required training on forced labour, modern slavery and human trafficking to all functions. This training includes specific content on recognizing and mitigating risks of forced labour, modern slavery, and human trafficking. In 2023, we continued to deploy this training and require completion on an annual basis by all connected functions and connected new hires.

6. Effectiveness, Monitoring and Continuous Improvement

Eaton is continuously monitoring the effectiveness of its efforts to address the risk of forced labour and child labour in our business and supply chains. This includes:

- Recording employee training completion and reviewing training provision and requirements to ensure that trainings relating to raising awareness of forced labour and child labour risks are made available on a risk-basis to employees, especially those who work in a supply chain related role.

- Monitoring via internal audit of businesses to ensure that contracts include provisions requiring adherence to the Supplier Code of Conduct or their equivalent.
- Monitoring via our supply chain resiliency program to detect and mitigate risks and where appropriate audit adherence to the Supplier Code of Conduct.
- Recording and investigating any incidents of actual or alleged non-compliance reported to the Company (either internally or by external third parties). Post-incident lessons learned reviews are conducted with identified lessons learned appropriately disseminated as part of Eaton's commitment to the continuous improvement of its programs.
- Continuous development, assessment, revision, and communication of Eaton's global policies, including supply chain management, finance, environment, health and safety, tax and legal policies, through Eaton's Policy Steering Committee. The committee's rigorous assessment and update of all policies, including those related to forced labour and child labour, helps assure effectiveness of Eaton's efforts to address these risks associated with Eaton's operations.

[Signature to Follow]

I, undersigned, attest that I have reviewed the information contained in this report for the Entities and it is accurate and complete for the purposes of the Act.

Nicolas Papaioannou, I have authority to bind Eaton Capital Unlimited Company.

Full Name:


Title: Director of Eaton Capital Unlimited Company

Date: 9 May 2024

Sabine Knobloch, I have authority to bind Eaton Holding IV S.à r.l.


Full Name:


Title: Manager of Eaton Holding IV S.à r.l.

Date: 9 May 2024

____ BEVERLEY A. NORMAN , I have authority to bind Eaton Industries (Canada) Company, Cooper Industries (Canada) Company, and Cooper Industries (Electrical) Inc.

Full Name: Beverley A. Norman


Title: Director of Eaton Industries (Canada) Company, Cooper Industries (Canada) Company, and Cooper Industries (Electrical) Inc.

Date: May 13, 2024