

## **Modern Slavery Statement Eaton Industries Pty Ltd and Eaton Electrical (Australia) Pty Ltd Financial Year Ended 31 December 2020**

This statement is made pursuant to the Modern Slavery Act 2018 (Cth) (the ‘**Act**’) by Eaton Industries Pty Ltd, ACN 103 014 571 and Eaton Electrical (Australia) Pty Ltd, ACN 000 050 644 (together, “**Eaton Australia**”) and covers the financial year 1 January 2020 to 31 December 2021 (“**reporting period**”).

This statement sets out the steps that Eaton Australia took during the reporting period to avoid and mitigate the risk of modern slavery and human trafficking taking place in our business and supply chain.

Eaton Australia is part 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 Overview**

Eaton is a power management company with 2020 net sales of USD \$17.9 billion. The Company provides sustainable solutions that help our customers effectively manage electrical, hydraulic and mechanical power - more safely, more efficiently, and more reliably. Eaton’s mission is to improve the quality of life and the environment through the use of power management technologies and services. Eaton has six key business segments: **Electrical Americas, Electrical Global, Hydraulics, Aerospace, Vehicle and eMobility**. Eaton has approximately 92,000 employees and sells products to customers in more than 175 countries. For more information, visit [www.eaton.com](http://www.eaton.com).

For additional information about our business segments and subsidiaries, including the wide variety of products manufactured in each segment, refer to our [investor relations page](#).

This statement is provided by Eaton Australia for the purposes of the Act. 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 \(eaton.com\)](#).

As part of the Eaton group, Eaton Australia shares and follows 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 modern slavery policies and risk mitigation) as described in more detail below.

### **Eaton Supply Chain Overview**

Eaton has a substantial number of suppliers globally that span across our six business segments. Our supply chain is multi-tiered and the raw materials, parts and services that we purchase are varied and are sourced from more than 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 to be an important measure of success. Doing Business Right is at the core of the Eaton brand. Eaton’s success as a high-performance company is tied directly to our long-standing commitment to the highest ethical standards. An important part of this commitment is ensuring that Eaton’s suppliers and supply chain do not use slave labour or engage in human trafficking. Several key governance processes and supporting policies guide our actions accordingly.

### **Eaton Code of Ethics**

Eaton’s [Code of Ethics](#) establishes respect for human rights as a fundamental Eaton principle, and one that both Eaton employees and suppliers are required to honour. Eaton’s Ethics Guide 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 established an 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](#) 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, slavery and human trafficking. Eaton suppliers are required to adhere to and certify compliance with the Supplier Code of Conduct.

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 Ethics Guide, Eaton Supplier Excellence Manual, 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.

In support of these policies, processes and procedures, Eaton undertakes specific actions to identify, prevent and mitigate the risk of forced labour, slavery and human trafficking in our own business and supply chain, including:

#### **1. Supplier Verification**

Risks related to slavery and human trafficking 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 separately review and accept 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- and 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.

## **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. Eaton monitors its supply chains for compliance with the Supplier Code; however, such monitoring is typically not focused solely on slavery or human trafficking. 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 slave labour or human trafficking. If necessary, Eaton may choose to engage third parties to evaluate compliance with slave labour laws or human trafficking non-compliances. Eaton will promptly and thoroughly investigate any claims or indications that a supplier may be engaging in slave labour or human trafficking 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, 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, modern slavery and human trafficking risks is established by Eaton's Code of Ethics and Supplier Code of Conduct. In addition, Eaton has enacted rigorous governance and risk management processes in order to identify and mitigate a broad spectrum of supply chain risks.

Eaton has established various mechanisms, including a global [Help Line](#), 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 slavery or trafficking 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. In addition, we provide ongoing training to Supply Chain Management and other key Eaton executives engaged with Eaton's supply chain on Protecting Human Rights. This training includes specific content on recognizing and mitigating risks of slavery and human trafficking.

## **6. Eaton's Enterprise Risk Assessment Program**

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 and modern slavery. 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" (including human rights and modern slavery in past years) are managed and mitigated under Eaton's ERM program by the relevant function(s), region(s) and/or business unit(s).

## **7. Eaton Australia's Local Risk Assessment**

Eaton Australia carried out a local risk assessment specific to its business operations in Australia to identify where there may be risks of modern slavery or human trafficking occurring within its business and supply chains.

### **Business operations risk assessment**

- Eaton Australia does not have manufacturing facilities or factories located in Australia. The goods (products and components) sold by Eaton Australia in Australia are primarily manufactured within Eaton's group of companies and in Eaton-owned and managed factories (with some local assembly carried out by Eaton Australia for some product lines). Eaton prohibits the use of slavery or human trafficking in its operations.
- Based on these risk factors, we assess as low the risk modern slavery or human trafficking in Eaton Australia's business operating in Australia and in the Eaton businesses that act as a direct inter-company supplier to Eaton Australia sold in Australia.

### **Supply Chain Risk Assessment**

- Eaton Australia completed a modern slavery risk assessment considering its overall supply chain in the reporting period. It identified the following supplier categories and assessed these for risks associated with modern slavery and human trafficking:

Suppliers to Eaton Australia from Eaton's international and global supply chain:

- We identified that Eaton's global supply chain is complex and multi-level, and includes supplies of goods, services and raw materials from geographies, supplier sectors and industries, and supplier activities where there is higher risk of modern slavery and/or human trafficking.
- Eaton has entity verification and due diligence processes in place intended to identify high-risk entities who may have a proven history of non-compliance and violations.
- Eaton recognizes and differentiates its global supplier management programs on a risk basis. Eaton takes a risk-based approach in how it implements, reinforces and monitors compliance with its Code of Ethics, policies, internal controls and supply chain due diligence, verification, governance, and training processes, and other risk-mitigation controls and processes intended to address modern slavery and human trafficking risks. For example: more in-depth selection processes, possible requirement of supplier due diligence or verifications, supplier code of conduct reinforcement certifications, and reminders and/or supplier trainings where a supplier and/or supplier activity has been identified as at higher risk.

Local Suppliers to Eaton Australia operating in Australia:

- We identified that there is low risk of instances of modern slavery occurring in Eaton Australia's local supply chain operations and activities that take place in Australia. We completed a risk-mapping process that identified Eaton Australia as directly appointing and procuring local suppliers of goods and services for the following categories:
  - Sub-contracting the provision of certain services to partner companies
  - Using out-sourced cleaning for our premises across Australia
  - Use of professional advisory, consultancy and support services
  - Local assembly of some product lines
  - Consumable supplies
- Eaton Australia carries out supplier selection and due diligence processes before appointing a new local supplier. All local suppliers are required under contract with Eaton Australia to comply with applicable laws; this includes Australia's laws requiring them to meet minimum employment and human rights standards, in addition to Eaton's requirements to meet Eaton's Code of Ethics and Supplier Code of Conduct obligations.
- Eaton Australia recognises that there are additional risks when using outsource service providers who may hire contingent workers and/or use casual temporary labour in the provision of their services. We set appropriate contractual expectations for our service providers that they must avoid modern slavery and human trafficking. This includes expectations that the outsource service providers have appropriate policies, internal controls and processes and training in place to prevent, detect and respond to reported incidents of modern slavery and human trafficking (for example: ensuring that they use pre-employment screening and verifications in their hiring process)..

Logistics - shipping and other transportation providers:

- We identified this as an area of supplier activity where there is an elevated risk of modern slavery or human trafficking occurring, especially when Eaton

goods are being transported via international shipping to Australia from geographies with elevated risks of modern slavery and/or human trafficking.

- Eaton Australia acts in line with Eaton’s global supply chain management approach in setting contractual expectations for its logistics providers that they must avoid modern slavery and human trafficking. This includes expectations that the logistics providers have appropriate policies, internal controls and processes and training in place to prevent, detect and respond to reported incidents of modern slavery and human trafficking.

### **Effectiveness, Monitoring and Continuous Improvement**

- Eaton is continuously monitoring the effectiveness of its efforts to address the risk of modern slavery 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 modern slavery risks are made available 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
  - 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.

### **Modern Slavery in context with Eaton’s Sustainability 2030 long-term strategy and goals**

Eaton’s sustainability strategy and goals provide important context in which to consider this statement. Eaton has developed a sustainability strategy that multiplies our impact through employee engagement and development, creating environmentally friendly solutions for our customers, reducing our own carbon footprint, demonstrating strong governance and social responsibility, and transparently communicating our sustainability plans and progress.

Eaton’s corporate sustainability strategy and performance is governed by its Board of Directors and Senior Leadership Committee. They are guided by the Sustainability Governance Council of 35 representatives from across the global enterprise. The group meets regularly to advance our strategy, discuss our response to emerging issues and ensure that we have a unified position on environmental, social and governance (ESG) issues.

Our sustainability governance process is how we manage material topics and who at Eaton is responsible for each topic, as shown on our governance table: [Governance | Sustainability | Eaton](#). Eaton considers having a sustainable supply chain as material to meeting its sustainability strategy and goals.

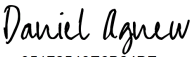
- Eaton set out its 2030 Sustainability Goals in its [Eaton 2019 Sustainability Report](#). Eaton has set a “Doing business right and transparency” goal to:
  - Disclose its performance using rigorous and credible global standards;
  - Address key societal issues; and
  - Operate with integrity.

- To achieve this goal, Eaton aims to ensure that there are no human rights violations from its key suppliers. This includes violations in the form of modern slavery and/or human trafficking.
- Eaton will be continuing to report on its progresses against these goals in future reports and the actions it is taking to achieve them.

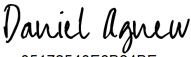
### Next Steps

We will continue to work on our efforts to identify, detect and prevent modern slavery and human trafficking risks within our businesses and supply chains, and integrate this within our overall sustainable supply chain management, Eaton's Policies and Governance Processes, and in alignment with our stated sustainability strategy and goals.

This Statement was approved by the Board of Eaton Industries Pty Ltd on 28 June 2021:

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Daniel Agnew  
Director, **Eaton Industries Pty Ltd**

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