



**EATON CORPORATION plc
DISCLOSURE STATEMENT UNDER
THE UK MODERN SLAVERY ACT 2015
AND
CALIFORNIA TRANSPARENCY IN SUPPLY CHAINS ACT 2010
FOR THE YEAR ENDED DECEMBER 31, 2024**

This statement is made pursuant to Section 54 of the UK Modern Slavery Act 2015 and the California Transparency in Supply Chains Act 2010 and covers all Eaton operations and subsidiaries globally.

About Eaton

Eaton Corporation plc (Eaton, the Company, we, us or our) is an intelligent power management company with revenues of \$24.9 billion reported in 2024. The Company provides sustainable solutions that help our customers effectively manage electrical, hydraulic and mechanical power - more safely, more efficiently, and more reliably. Eaton 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 and 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 2024 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 labor including modern slavery and human trafficking in its operations in any form and we do not employ child labor. An important part of this commitment is also ensuring that Eaton's suppliers and supply chain do not use forced labor, engage in modern slavery or human trafficking or use child labor. Several key governance processes and supporting policies guide our actions accordingly.

Eaton Code of Ethics

Eaton's [Code of Ethics](#), refreshed in 2023, includes our fundamental principles to respect human rights and to protect Human Rights at all levels which we expect both 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 labor 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 Human Rights policy

In 2024 Eaton introduced a new Global [Human Rights policy](#). The policy sets out our expectations for protecting and respecting human rights in our business practices and for avoiding complicity in human rights violations consistent with our values.

Eaton Supplier Code of Conduct

In 2024 we updated our [Supplier Code of Conduct](#). The Code of Conduct continues to set forth minimum workplace, labor and human rights standards and business practices that are required of any supplier doing business with Eaton, consistent with our company's values as documented in Eaton's Code of Ethics and Human Rights policy. The updated Code requires suppliers to provide confidential reporting channels and grievance mechanisms to their workforce so they can raise concerns or report wrongdoing (including human rights violations) free from fear of retaliation. It also reinforces that Eaton's global [Ethics Help Line](#) reporting process is available both to suppliers and their workforce. These requirements apply to suppliers of Eaton, their affiliates and subsidiaries globally and other Eaton appointed third parties and include prohibitions on the use of forced labor, modern slavery, human trafficking and child labor. Eaton suppliers are required to adhere to and certify compliance with the Supplier Code of Conduct.

Eaton's Code of Ethics, Human Rights policy 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, 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, forced labor 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"

are managed and mitigated under Eaton's ERM program by the relevant function(s), region(s) and/or business unit(s). Human rights, forced labor, and modern slavery have not risen to the level of a "top risk" in prior years.

In 2024, to complement our ERM program, Eaton also partnered with a human rights consultancy to carry out a human rights saliency assessment to further identify and prioritize the potential human rights risks and impacts from Eaton's business activities and relationships as relevant to Eaton and its stakeholder groups. This assessment used the UN Guiding Principles on Business and Human Rights saliency criteria. Forced labor including modern slavery, human trafficking and use of child labor was identified as a potential priority risk and impact. As part of the assessment Eaton also mapped its governance and reporting processes, policies, controls and stakeholder engagement mechanisms against its priority risks and impacts and for forced labor, modern slavery, human trafficking and child labor these are as summarized in this statement.

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

1. Verification and Continuous Monitoring

Risks related to forced labor, including modern slavery, human trafficking and use of child labor 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 contracts, terms and conditions. Suppliers are required to further separately review and affirm to 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 investigate 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 labor, modern slavery, human trafficking and child labor 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 labor, modern slavery, human trafficking and the use of child labor. If necessary, Eaton may choose to engage third parties to evaluate compliance with our Code (including our prohibition on forced labor, modern slavery, human trafficking and the use of child labor) and applicable labor laws. Eaton will promptly and thoroughly investigate any claims or indications that a supplier may be engaging in forced labor, modern slavery, human trafficking or the use of child labor, 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 labor, modern slavery or servitude, or human trafficking or child labor.

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 labor, modern slavery, human trafficking and child labor risks is established by Eaton's Code of Ethics, Human Rights policy and Supplier Code of Conduct. In addition, Eaton has 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 [Ethics 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 [Ethics Help Line](#) or related means.

If we learn of any allegations of forced labor, modern slavery, human trafficking or the use of child labor through our [Ethics 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 to our 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 2024, we continued to deploy training to all functions and new hires, on a risk-basis, including specific content on recognizing and mitigating risks of forced labor, modern slavery, human trafficking and child labor.

Approved by the Board of Directors on April 22, 2025.

Craig Arnold, Chairman of the Board
Eaton Corporation plc