

Eaton Ombuds Pledge

We pledge strict confidentiality concerning matters you bring to us, unless, at the time of our discussion, you give us permission to talk with another person. The only exception to this pledge is if the situation involves the imminent threat of serious harm.

You or Eaton may not waive this pledge of confidentiality.

Communications regarding matters we discuss are confidential.

Matters discussed with us are off-the-record and do not constitute formal notice to Eaton. We will identify and discuss other channels within the company that exist for notice.

confidential • independent
neutral • off-the-record



Office of the Ombuds:

Toll-free
1.866.29.OMBUD (66283)
SECURE AND SEPARATE FROM ADNET AND
OTHER EATON PHONE LINES

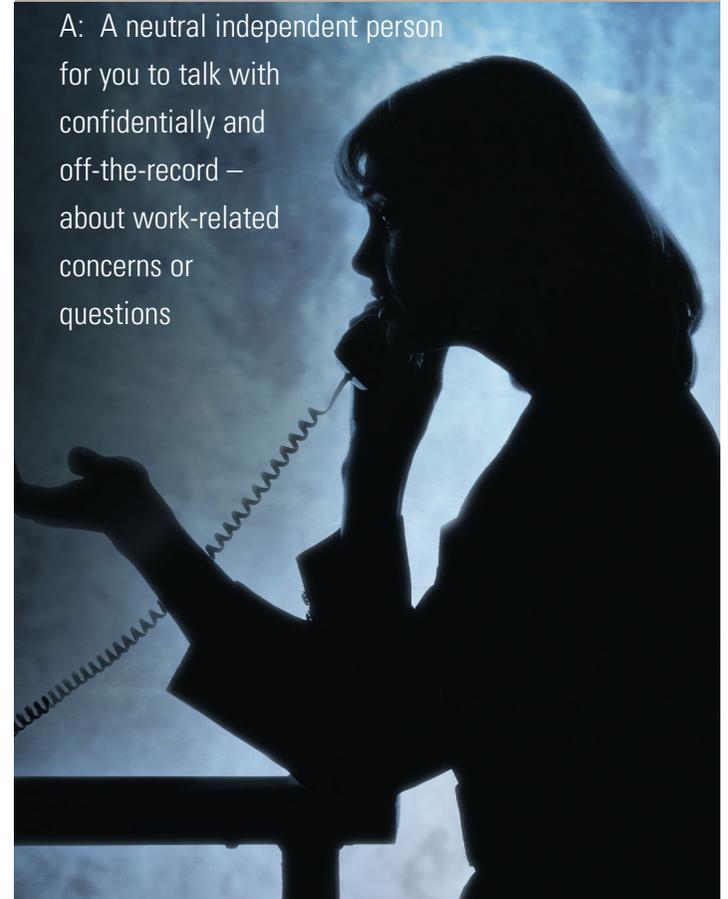
Office of the Ombuds
Eaton Corporation
13100 E. Michigan Avenue
Galesburg, MI 49053
269.342.3462
www.etn.com/ombud/



Office of the Ombuds

Q: What is an Ombuds?

A: A neutral independent person for you to talk with confidentially and off-the-record – about work-related concerns or questions



“doing
business
right”

“doing
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“doing
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Sandy Cutler
Eaton Chairman & CEO

We are part of a growing global company, a company that sells products to customers in more than 100 countries around the world. Yet all of us at Eaton share this commitment – we care about how we get results.

It's not only a pledge to our customers, our suppliers, and the communities in which we do business - it's also a pledge to *you*, the people who are Eaton.

To really live by our values, we need the opportunity to voice concerns and resolve issues in the workplace. I encourage all of us to bring issues to the normal channels we have in place.

To complement these channels we also have an Office of the Ombuds. In the Office of the Ombuds, you can speak with a neutral and confidential person off-the-record about work-related questions and concerns.

I encourage you to learn about the Office of the Ombuds. With many years of experience at Eaton, the Ombuds bring sensitivity and skill to a role that demands trust.

The Office of the Ombuds is another resource we have – to do business right.

**“doing
business
right”**

Why does Eaton have an Office of the Ombuds?

We want to make sure we really are doing business right. If you have a concern in the workplace or if you see anything you believe may violate our philosophy, the Office of the Ombuds gives you a place to talk confidentially and off-the-record. The Ombuds Office helps you learn how to address and resolve your concerns. The Ombuds Office helps Eaton understand workplace issue trends in order to make positive changes and share best practices.

How is the Office of the Ombuds different from other Eaton organizations?

The Office of the Ombuds does not replace local resources for resolving issues, such as human resources, line management, the employee assistance program (EAP), environmental health and safety or the quality department. Nor does it replace corporate resources such as the global ethics office or the law department. These channels investigate issues and make decisions and policies. When you bring an issue to these channels, it's an official notice to the company. But the Office of the Ombuds is independent and neutral. Any action taken is up to you. All communications with the Ombuds are made with the understanding that they are confidential and off-the-record.

When would I use the Office of the Ombuds?

You can bring most workplace issues to normal Eaton channels. The Ombuds is an alternative if you don't know where to go, how to surface an issue, if you want to have an off-the-record conversation with a neutral party or if you want complete confidentiality.

Eaton Office of the Ombuds



What can I expect when I contact the Office of the Ombuds?

Your question or concern will be taken seriously – and responded to promptly, discreetly and professionally. You might think of the Ombuds as a coach who listens to you – and then helps determine the nature and extent of your concern, the pros and cons of different options to address it, and an approach for taking it forward.

When you discuss your options with the Ombuds, you determine the action to be taken. The Ombuds will not take action or tell anyone about your conversations, not even the Company, unless in the course of your conversation you give permission to do so. The only exception is a situation of imminent threat of serious harm.

The Ombuds will:

- Listen to concerns
- Keep information confidential
- Remain impartial to all individuals
- Help clarify concerns
- Help identify and evaluate resolution options
- Provide information and coaching
- Assist in achieving outcomes consistent with fairness, Eaton values and the law
- Offer informal mediation and shuttle diplomacy
- Act as an early warning system and identify workplace trends
- Identify changes that prevent issues from recurring

The Ombuds will not:

- Breach confidentiality
- Take sides
- Conduct formal or in-depth investigations
- Determine policy
- Make management decisions
- Substitute for formal channels