



Office
of the
Ombuds

Listen

Guide

Coach

Report of the
Ombuds Office

Clarify

Facilitate

EAT•N

Powering Business Worldwide

Come with a concern leave with a plan.

Eaton's Office of the Ombuds is an active member of the International Ombudsman Association (IOA) whose mission is to support and advance the global organizational ombudsman profession and ensure that practitioners work to the highest professional standards. Eaton's Ombuds adhere to the IOA Code of Ethics and Standards of Practice.

OMBUDS OFFICE MISSION

Eaton's Ombuds program provides confidential, neutral and informal assistance in surfacing and resolving workplace issues to:

- Protect human, financial, and other assets
- Preserve company reputation
- Comply with laws and regulations, including U.S. Sentencing Guidelines and Sarbanes-Oxley
- Promote an ethical, fair, and values-driven work environment consistent with ethical business conduct and Eaton's core values

All matters discussed with an Ombuds are considered confidential and do not constitute notice to Eaton Corporation.

ETHICAL PRINCIPLES AND STANDARDS OF PRACTICE

INDEPENDENCE

The Ombudsman is independent in structure, function and appearance to the highest degree possible within the organization.

NEUTRALITY AND IMPARTIALITY

The Ombudsman, as a designated neutral, remains unaligned and impartial. The Ombudsman does not engage in any situation that could create a conflict of interest.

CONFIDENTIALITY

The Ombudsman holds all communications with those seeking assistance in strict confidence, and does not disclose confidential communications unless given permission to do so. The only exception to this privilege of confidentiality is where there appears to be imminent risk of serious harm.

INFORMALITY

The Ombudsman, as an informal resource, does not participate in any formal adjudicative or administrative procedure related to concerns brought to his/her attention.

To learn more about the IOA's Code of Ethics and Standards of Practice, visit www.ombudsassociation.org.

OMBUDS OFFICE ACTIVITY

18-MONTH SNAPSHOT

Presented refresher programs at **17** sites in Latin America, **11** sites in North America, and **5** sites in mainland China, Hong Kong and Taiwan.

Introduced the Ombuds program at **30** sites in mainland China, Hong Kong and Taiwan.

Received more than **2000** inquiries.

Expanding Our Reach

I am pleased to present the *Report of the Ombuds Office*, which is designed to further your understanding of our roles and responsibilities. The report provides an 18-month snapshot of our services, level of activity, and overall performance.

Since our last report, we have made significant progress in advancing the goal of serving Eaton employees worldwide. We completed the program's rollout in mainland China, Hong Kong, and Taiwan, and appointed Devyani Singh to lead the program's introduction throughout India. We are also preparing for the program's initial implementation in the United Kingdom. Once these rollouts are completed, our services will reach an estimated 75 percent of Eaton employees worldwide.

As a team, we strive to continuously improve the service we deliver to you. During the past year several of our field ombuds earned the Certified Organizational Ombudsman Practitioner (CO-OP) designation from the International Ombudsman Association. Successful completion of the certification exam and interview provides an added level of assurance to you that Eaton's Ombuds are practicing to the association's high professional standards.

As we look toward the future, we pledge to continue providing you with a confidential place to discuss and resolve workplace issues and concerns. Integral to that pledge is our ongoing commitment to deliver the responsiveness, accessibility and actionable guidance you have come to expect from the Ombuds team.

Ilene Butensky

DIRECTOR, OFFICE OF THE OMBUDS
CERTIFIED ORGANIZATIONAL OMBUDSMAN PRACTITIONER



Living Our Culture and Values

At Eaton, we take pride in our commitment to balance our drive for performance excellence with our commitment to doing business right. The foundation for sustaining a workplace that delivers on that commitment is embodied in Eaton's core values of customer orientation, trust, respect, dignity, integrity, and recognizing people as our most valued resource.

Eaton's Ombuds program serves a vital role in supporting our values. As an informal, confidential, neutral, and independent channel of communication, the Office of the Ombuds gives you a place to go for guidance in dealing with workplace issues while giving you the power to decide how to resolve your concerns.

The Office of the Ombuds has had more than 9,000 contacts with employees since its inception in North America eight years ago. Today the program has expanded to other regions and countries around the world – growth which continues to this day.

I encourage employees to use this important service when the need arises. By asking for help in resolving issues that compromise Eaton's stated values, you are helping to sustain our reputation as a company that *lives* its values.

Sandy Cutler

CHAIRMAN AND CEO

Why people use the office

People contact the Ombuds when they:

- Do not know where to take their concerns
- Do not know how to take their concerns forward
- Want complete confidentiality
- Need a neutral sounding board to help identify and evaluate their options
- Want off-the-record conversations with a neutral, informal party who has extensive knowledge of the company
- Need information about the company's policies

While the Ombuds code of confidentiality prevents the office from sharing actual cases, fictional scenarios such as those provided here illustrate the types of situations we handle.

“Something does not add up.”

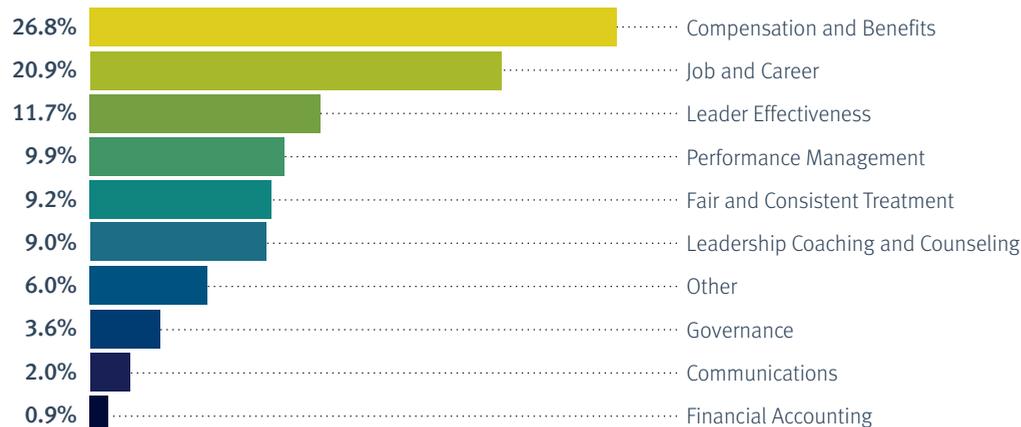
CONCERN

Robert had questions about how sales were being accounted for in his group's incentive program. From Robert's point of view it appeared that sales incentives were being inflated. Robert spoke to his manager a couple of times about the concern and was told to use the numbers he was given. Even though the financial reporting was not impacted, Robert still had concerns about the way sales were being counted for the incentive program. To Robert, this seemed to conflict with Eaton's commitment to doing business right. He knew that the Ombuds was confidential and independent from the formal organizational structure, so he felt they would be a neutral sounding board on the issue. After thinking about the situation for a couple of weeks, he contacted the Ombuds for guidance.

OMBUDS RESPONSE

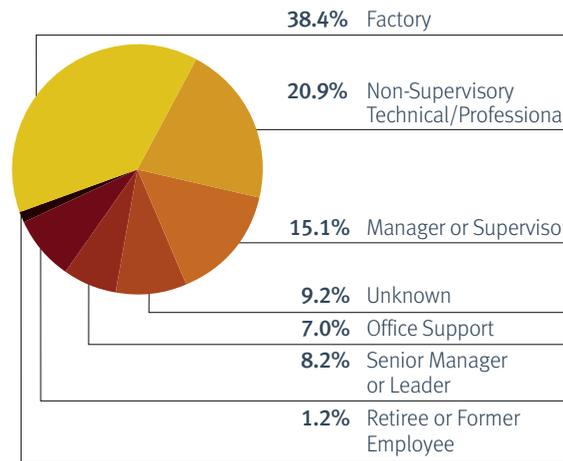
The Ombuds listened to Robert's concerns and the details surrounding the issue. Robert and the Ombuds discussed several options, including speaking to his HR manager, discussing the matter with his second-level manager, or contacting the Global Ethics Office. Robert thought about the options and decided to ask the Ombuds to facilitate a call with the Global Ethics Office. The Ombuds agreed and set up the meeting. After thoroughly discussing the case with Robert, the ethics representative initiated an investigation into his concerns.

INQUIRIES

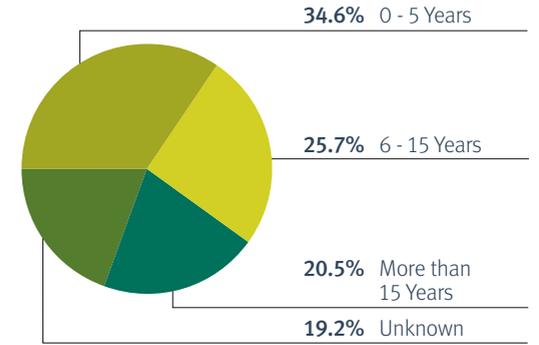


USER DEMOGRAPHICS

Population



Years of Service



“I need a break.”

CONCERN

Maria called the Ombuds office about the amount of overtime being worked at her plant. She told the Ombuds that many employees had been working seven days a week for several months. Many of her co-workers were also commenting about being tired and not having enough time with their families. Maria also said they often didn't have enough work to do on Mondays because materials had not been procured in time. Maria spoke to her supervisor several times about these concerns, but nothing seemed to change.

OMBUDS RESPONSE

After talking through the options available to her, Maria asked the Ombuds to speak with the facility's HR manager but not to reveal her name. The Ombuds discussed the concerns with the HR manager, who explained the facility's need for overtime but acknowledged that they may need to explore ways for employees to take more time off. After the conversation, the plant staff decided to form a team to look at their flow of materials to ensure production work could proceed without delay every Monday. The team also brainstormed ways for employees to get some needed time off.



“The Ombuds office is a great place to turn when you aren't sure where to go.”

Crystal Bahr
ASSOCIATE OMBUDS



“You can talk to us confidentially. It might be the best conversation that you *never* had.”

Evan Arrowsmith
FIELD OMBUDS – NORTH AMERICA
CERTIFIED ORGANIZATIONAL OMBUDSMAN PRACTITIONER



“The ethical principles that guide our practice give peace of mind to employees who seek our help.”

John Simonetti
FIELD OMBUDS – NORTH AMERICA
CERTIFIED ORGANIZATIONAL OMBUDSMAN PRACTITIONER



“Our office is a good place to sort through workplace concerns and receive guidance on the options available to you.”

Gennette Tripari
FIELD OMBUDS – LATIN AMERICA AND CARIBBEAN

Facilitating feedback for leaders

In addition to serving as a resource for individual callers, the Office of the Ombuds also facilitates employee feedback for leaders of organizational units. These services ...

- Assist management in taking a “deep dive” into specific organizational issues or concerns
- Allow employees to safely voice their opinions and provide insight to a neutral third party through structured, confidential interviews
- Provide filtered feedback to management in a manner that protects the identity of the employee
- Facilitate a deeper understanding of difficult issues by gathering information and impressions not captured in traditional feedback processes

If you are a functional or organizational leader, contact the Office of the Ombuds to learn more about these services.

“My supervisor is disrespectful.”

CONCERN

The Office of the Ombuds received a call from Nicole who felt that some supervisors were exhibiting disrespectful behavior. Nicole alleged that the supervisors were verbally threatening employees about losing their jobs. To Nicole, this type of behavior and language did not fit with Eaton’s values or philosophy. She was reluctant to talk to local management because she was afraid of retaliation. Nicole decided to call the Ombuds.

OMBUDS RESPONSE

The Ombuds listened to Nicole describe the issue, asking several questions to gain a full understanding of her concern. After discussing the various options available to her, she decided to give the Ombuds permission to speak with the HR manager about the situation and how it was affecting the workgroup, but not to reveal her name. The Ombuds noted that the location’s employee survey scores also indicated a potential problem. The Ombuds and the HR manager discussed some potential actions that might improve the work environment. The HR manager worked with Eaton University and the plant manager to schedule frontline leader “Core 5” curriculum training for all of the facility’s supervisors. The HR manager also discussed expectations for sustaining Eaton’s values and philosophy with the management team and to reinforce that retaliation is contrary to those values.

“I want to participate but can’t.”

CONCERN

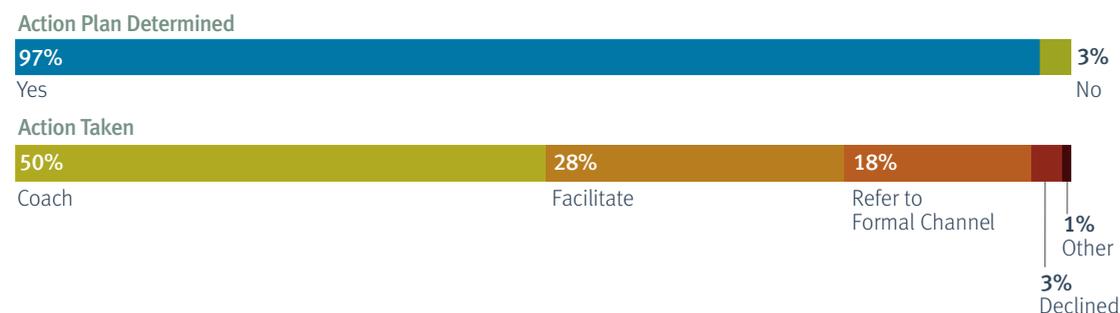
Mike’s location recently launched a wellness program that encourages employees to walk for 30 minutes three times a week for six weeks. Mike’s manager put pressure on everyone to support the program, saying that he “fully expected everyone to participate.” Mike was already exercising regularly, but he had a physical condition that would not allow him to walk for thirty minutes without pain. He was afraid that it might negatively affect his supervisor’s opinion of him if he did not participate in the walking activity. Mike called the Ombuds to discuss ways to resolve his concerns.

OMBUDS RESPONSE

The Ombuds listened to Mike’s concern and they discussed various options available to him. Mike decided to talk to the HR manager about his limitation and suggest that the program include additional wellness activities. At the Ombud’s suggestion, Mike also referred to the “Get Fit” portion of Eaton’s wellness initiative, which encourages employees to choose fitness activities they enjoy. After they spoke, the HR manager assured Mike that his decision to participate would be entirely up to him and that there would not be any negative consequences for not participating. Based on Mike’s suggestion, the program organizers decided to include any type of exercise activity. Pleased with the outcome, Mike decided to participate by choosing an activity that was appropriate for him.

CASE OUTCOMES

The Ombuds work with employees to identify multiple options and approaches for resolving their concerns in a non-threatening and cooperative way.



“I look forward to bringing our services to more countries in Asia Pacific as we increase our presence throughout the region.”

Sophia Qiao
FIELD OMBUDS – ASIA PACIFIC
CERTIFIED ORGANIZATIONAL OMBUDSMAN PRACTITIONER



“I am really excited to create awareness about the Ombuds as we introduce the program to employees in India – and deliver the training they need to use our service effectively.”

Devyani Singh
FIELD OMBUDS – INDIA

Frequently Asked Questions

What is the Office of the Ombuds?

The Office of the Ombuds exists to help Eaton employees resolve workplace concerns. The Ombuds complement but do not replace the roles of the primary and formal issue resolution channels, such as local management; human resources; global ethics and compliance; audit; and the environment, health and safety functions.

Are my communications with the Ombuds confidential?

Communications with the Ombuds are privileged and made with the understanding they will be kept confidential. The only exception is if the situation involves the imminent risk of serious harm. The Ombuds are neutral and independent. Matters discussed with the Ombuds are off the record and do not constitute formal notice of a claim to Eaton. The confidentiality of the Ombuds office makes it a safe place to discuss issues without fear of retaliation.

What can I expect if I use the Ombuds' services?

Although each case is different, generally the Ombuds listens to your concern and asks questions to fully understand it. The Ombuds will work with you to identify reasonable options for addressing your concerns. The potential pros and cons of each option are discussed in detail with you, enabling you to decide which option you believe is the best.

How can I contact the Ombuds?

The Ombuds office can be contacted through its confidential, toll-free telephone lines, which are separate and secure from Eaton phone lines. You can also contact us by email at Ombuds@eaton.com to set up a meeting or call. **Please remember that e-mail is not a confidential form of communication.**

Who can use the Ombuds?

The services of the Ombuds office are available to all Eaton employees and associates. This includes family members, retirees, contract workers and former employees including those of divested or closed operations.

When should I contact the Ombuds?

The Office of the Ombuds is available to you at anytime for coaching and guidance in resolving your work-related concerns. The preferred channel for resolving concerns is to discuss them with your supervisor or other local members of management, including your local HR manager. The Office of the Ombuds assists employees in situations where this is not feasible. If your concern involves a potential breach of Eaton's Code of Ethics or violations of law, the Global Ethics Office is available to assist you. If you are unsure of where to seek help, you can call the Ombuds office and we can refer you to the proper resource for help.

Confidential Toll-Free Numbers

Secure and separate from Eaton phone lines. To contact us, dial the toll-free number, or the AT&T access code + toll-free number:

USA, Canada & Puerto Rico	1-866-29-OMBUD (1-866-296-6283)
Argentina	0-800-288-5288 + 866-296-6283
Brazil	0-800-8888-288 + 866-296-6283
Chile	800-360-312 + 866-296-6283
Costa Rica	0-800-011-4114 + 866-296-6283
Dominican Republic	11-22 OR 1-800-872-2881 + 866-296-6283
El Salvador	800-1785 + 866-296-6283
Guatemala	138-120 + 866-296-6283
Honduras	800-0-123 + 866-296-6283
Mexico	01-800-112-2020 + 866-296-6283
Nicaragua	1-800-0164 + 866-296-6283
Panama	800-2288 + 866-296-6283
Venezuela	0-800-552-6288 + 866-296-6283

Select your preferred language from the menu:

- For English press 1
- For Spanish press 2
- For Portuguese press 3
- For Chinese press 4

From the following locations, dial these direct toll-free numbers:

China - Mainland	800-820-0891 (LANDLINE USERS) 400-820-0891 (MOBILE PHONE USERS)
Hong Kong	800-968-331
Taiwan	0800-088-658

We may also be contacted by mail at:

Office of the Ombuds
13100 E. Michigan Avenue
Galesburg, MI 49053
USA

For further information, visit us at www.eaton.com/ombuds or e-mail ombuds@eaton.com. (Please remember that e-mail is not a confidential form of communication.)

For hearing impaired employees, the Ombuds office is accessible through relay services. Please contact us through a toll-free number, or by e-mail if confidentiality is not a concern, to make the needed arrangements.



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