

## 1 Process Description Complaint Management

Supplier	Prozess	Receiver
Complainant	<p data-bbox="763 655 1456 691"><b>1.1 Description of single steps to submit Complaints</b></p> <p data-bbox="689 767 1529 802"><u>Here are the Websites for access to Caterpillar Complaint Management:</u></p> <p data-bbox="949 884 1270 914"><a href="https://www.caterpillar.com/">https://www.caterpillar.com/</a></p> <p data-bbox="853 999 1366 1029"><a href="https://www.caterpillar.com/en/company.html">https://www.caterpillar.com/en/company.html</a></p> <p data-bbox="757 1114 1462 1144"><a href="https://www.caterpillar.com/en/company/code-of-conduct.html">https://www.caterpillar.com/en/company/code-of-conduct.html</a></p> <p data-bbox="602 1228 1617 1259"><a href="https://www.caterpillar.com/en/company/code-of-conduct/office-of-business-practices.html">https://www.caterpillar.com/en/company/code-of-conduct/office-of-business-practices.html</a></p> <p data-bbox="887 1398 1335 1428">Here you find the reference to contact:</p>	CES

# Code of Conduct

## Our Values In Action

### Caterpillar's Code Of Conduct

Our Worldwide Code of Conduct, first published in 1974, defines what we stand for and believe in, documenting the uncompromisingly high ethical standards our company has upheld since its founding in 1925. The Code helps Caterpillar employees put our values and principles into action every day by providing detailed guidance on the behaviors and actions that support our values of Integrity, Excellence, Teamwork, Commitment and Sustainability.

On February 9, 2015, Caterpillar Inc. approved amendments to its Code of Conduct (the "Code"). The Code applies to the daily activities of employees of Caterpillar Inc., its subsidiaries and affiliates worldwide and members of its Board of Directors. Caterpillar Inc. amended the Code to elevate Sustainability as a core Value, clarify, update or enhance certain provisions, and improve readability for employees.

Have a question or concern? Contact the [Office of Business Practices](#).

The steps on the website of Caterpillar Inc. leads to „**Office of Business Practices**“

Here you can submit your complaint.

## 1.2 Office of Business Practices

Anonymous complaints can be made directly via the website of the Office of Business Practices. It is expressly pointed out that a complaint does not lead to measures being taken against the complainant.

# Office of Business Practices

At Caterpillar, we live by a Code that provides guidance for ethical business practices and the way we conduct ourselves in the workplace. Caterpillar is dedicated to providing a work environment that reflects, supports and promotes our foundational values of Integrity, Excellence, Teamwork, Commitment and Sustainability. If you encounter an issue, need advice, or have a question related to the Code of Conduct, Caterpillar has systems in place to make sure you can get the guidance you need, confidentially. First, check with your supervisor, local management, local or corporate human resources teams or Legal Services. You always have the option to contact the Office of Business Practices using the contact information below.

The Office of Business Practices answers questions on the specific values and behavioral expectations described in Caterpillar's Code of Conduct, policies, procedures, and practices. Certain issues such as union grievances, union contract issues, and matters that relate to pending or threatened litigation are beyond the scope of the Office of Business Practices' activities and will be referred appropriately.

We must all use these reporting rights responsibly and report issues only where we reasonably believe there has been a violation, and not where the report is intended to be harassing, is based on personal opinion only, or is otherwise trivial.

### **No Retaliation Policy**

Caterpillar will not take any action against you as a result of raising an ethical issue in good faith. Also, Caterpillar does not tolerate any reprisal by any individual against an employee for raising a concern or making a report in good faith.

Complainant

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### 1.3 Possibilities for written complaints

The options for anonymous complaints are all described here:

#### **CONTACT THE OFFICE OF BUSINESS PRACTICES**

##### **Frequently Asked Questions**

**Online Reporting** (can be submitted anonymously): <https://caterpillar.ethicspoint.com/>

**By Email:** [BusinessPractices@cat.com](mailto:BusinessPractices@cat.com)

##### **By Mail:**

Caterpillar Inc.  
Office of Business Practices  
100 N.E. Adams Street  
Peoria, IL 61629-6485 USA

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## Procedure in Ethicspoint:

The screenshot shows the NAVEX EthicsPoint website. The top navigation bar features the NAVEX logo on the left and the CAT logo on the right, with a language dropdown menu set to 'English'. The main content area is divided into two columns. The left column contains a sidebar with links for 'Follow-up on a Report' and 'FAQs', followed by a section titled 'To Make a Report' which includes a dropdown menu for selecting a country. The right column contains an 'ATTENTION!' notice, a section titled 'Our Commitment' with a paragraph about Caterpillar Inc.'s communication policy, and a section titled 'EthicsPoint is NOT a 911 or Emergency Service' with a warning not to use the site for emergencies. The footer contains copyright information and links to 'Privacy Statement', 'Acceptable Use Policy', 'Cookie Statement', and 'Contact NAVEX'.

**NAVEX**

**CAT**

English

Follow-up on a Report

FAQs

**To Make a Report**

Select the country in which you are located.

- Select -

After you complete your report you will be assigned a unique code called a "report key." Write down your report key and password and keep them in a safe place. After **14** business days, use your report key and password to check your report for feedback or questions.

**ATTENTION!** This webpage is hosted on EthicsPoint's secure servers and is not part of the Caterpillar Inc. website or intranet.

**Our Commitment**

Caterpillar Inc. is committed to an environment where open, honest communications are the expectation, not the exception. We want you to feel comfortable in approaching your supervisor or management in instances where you believe violations of policies or standards have occurred.

In situations where you prefer to place an anonymous report in confidence, the information you provide will be sent to us by EthicsPoint on a totally confidential and anonymous basis. You have our guarantee that your comments will be heard.

**EthicsPoint is NOT a 911 or Emergency Service:**

Do not use this site to report events presenting an immediate threat to life or property. Reports submitted through this service may not receive an immediate response. If you require emergency assistance, please contact your local authorities.

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Follow-up on a Report

FAQs

## To Make a Report

Select the country in which you are located.

Austria

## Online

Select the country in which the violation took place.

Austria

Select the state in which the violation took place.

Osterreich

Select the city in which the violation took place.

Schwaz

Select the location where the violation took place.

Schwaz Austria Cat Energy Office & W

Click the "Continue" button to proceed with filing your report.

Continue

## By Phone

**Reporting by phone is not currently available for the location you have selected. Please use the online reporting option to submit your concern.**

After you complete your report you will be assigned a unique code called a "report key." Write down your report key and password and keep them in a safe place. After **14** business days, use your report key and password to check your report for feedback or questions.

You can only continue with the message after entering the country, state and city.



You are now in an EthicsPoint Secure Area | **File a Report**

## Data Protection & Privacy Notice

The data privacy regulations of some countries require that a person making a report containing personal data be notified of certain collection and retention practices regarding the information submitted and must accept the terms and conditions for the use of this service.

You are being asked to read and accept the terms outlined below. If you do not accept the terms below, we are unable to accept any information through this system and suggest you contact your supervisor or manager to discuss the matter further.

### 1. General

This service is a web and phone-based intake system provided by your organization to individuals for reporting suspected violations of laws or regulations or company policies.

[For more information click here.](#)

### 2. Use of this service

Use of this service is entirely voluntary. You are encouraged to report possible violations directly to your supervisor or manager. If you feel that you are unable to do so, you may use this service to make your report.

[For more information click here.](#)

### 3. What personal data and information is collected and processed?

This service captures the following personal data and information that you provide when you make a report: (i) your name and contact details (unless you report anonymously) and whether you are employed by the organization; (ii) the name and other personal data of the persons you name in your report if you provide such information (i.e.: description of functions and contact details); and (iii) a description of the alleged misconduct as well as a description of the circumstances of the incident. Note that the laws of some countries do not permit reports to be made anonymously; however, your personal information will be treated confidentially and will only be disclosed as set out below.

### 4. How will the personal data and information be processed after your report and who may access personal data and information?

The personal data and information you provide will be stored in a database which is located on servers hosted and operated by NAVEX, Inc. in the United States. NAVEX is committed to maintaining stringent privacy and security practices including those related to notice, choice, onward transfer, security, data integrity, access, and enforcement. For more information about how we protect the information we collect, please visit: <http://www.navexglobal.com/en-us/privacy-statement>.

[For more information click here.](#)

### 5. Accessing information concerning the report

Your organization should promptly notify any person who is the subject of a report to this service except where notice needs to be delayed to ensure the integrity of the investigation and preservation of relevant information.

[For more information click here.](#)



	<p><b>6. Special country regulations</b></p> <p>Throughout much of the European Union and surrounding areas, reports can only be made relating to limited topics, typically accounting, auditing, bribery, competition law, discrimination and harassment and environment, health, hygiene, and safety matters. Further, some countries also restrict the subject of a report to only employees in key or management functions.</p> <p><u><a href="#">For more information click here.</a></u></p> <p><input type="checkbox"/> I CONSENT, I have read and expressly consent to the processing of my personal information as described in sections 3 and 4 above.</p> <p><input type="button" value="Continue"/> <input type="button" value="Cancel"/></p> <p>Copyright © 2000-2023 NAVEX Global, Inc. All Rights Reserved. <a href="#">Privacy Statement</a>   <a href="#">Acceptable Use Policy</a>   <a href="#">Cookie Statement</a>   <a href="#">Contact NAVEX</a></p> <p><b>After consenting to the processing of personal data, the complaint can be entered.</b></p>	
Complainant	<p><b>1.4 Possibilities of Telephone Complaints</b></p> <p>The possibility of a telephone complaint is described here:</p>	CES

**By Phone:**

We have engaged NAVEX Global, Inc., an independent organization staffed by interview specialists, to answer each Helpline call since their personnel are available to provide coverage 24 hours a day, 7 days a week. When you call, you do not have to give your name. Each call to the Helpline will be summarized in a report by an interview specialist from NAVEX Global, Inc. Reports will be sent electronically to the office of Business Practices and receive prompt, personal attention.

Call Collect Helpline +1-770-582-5275 (language translation available)

Toll-free Helpline: Caterpillar maintains toll-free Helpline numbers in various countries. Inside Canada, the United States, and the U.S. Virgin Islands the number is 1-800-300-7898.

**International Toll-free OBP Helpline Numbers:**

Callers need to first dial the number required for an external line.

<b>Country</b>	<b>Phone</b>
Australia	1-800-49-1791
Belgium	0800-13 628
Brazil	0800-900-0042
Canada	1-800-300-7898
China	4001200062
Czech Republic	800-880-854
France	0800-90-87-84
Germany	0800-182-0159
Hungary	06-80-020-141
India	022-5097-2500

	Indonesia	021-31141485	
	Italy (includes San Marino, Vatican City)	800826914	
	Japan	0800-500-9525	
	Kazakhstan	8 (727) 357 4043	
	Korea	00308-11-0555	
	Mexico	8008721646	
	Netherlands	0800-0229851	
	Poland	800005260	
	Russia	See instructions below	
	Singapore	8004922811	

Slovak Republic	0800-601-181
South Africa	080-098-2631
Spain	900751127
Sweden	020-79-48-59
Switzerland	0800-563-957 *
Thailand	1800018222
United Arab Emirates	8000120286
United Kingdom & Northern Ireland	0800-031-8509
United States (including U.S. Virgin Islands)	1-800-300-7898

(\*not available from mobile phones)

**Russia - Instructions for using AT&T Direct Access are as follows:**

Employees will dial the AT&T Direct Access Code listed below for their particular area/telephone carrier to get on to the AT&T network. The caller will then hear a tone or prompt. After the prompt, dial the **Second Stage Number** listed below (toll-free number) upon hearing the tone/prompt. This will connect the caller to NAVEX Global, Inc.

Note: **It is important to dial the second number when prompted, regardless of the type of prompt.** The tone/prompt, if verbal, may be in English or the native language, depending on how AT&T has set up the network associated to that access line.

<b>Country</b>	<b>AT&amp;T Access Code</b>	<b>Language</b>
Russia (Moscow)	8^495-363-2400	Russian
Russia (St. Petersburg)	8^812-363-2400	Russian
Russia (all other areas)	8^10-800-110-1011	Russian
<b>Second Stage Number</b>	<b>800-300-7898</b>	

Public phones require coin or card deposit.  
May not be available from every phone/public phone.  
Additional charges apply when calling outside Moscow and St. Petersburg.

## 2 Summary of Requirements for German Supply Due Diligence Chain Act

**Scope:** This procedure covers any reporting party worldwide (Caterpillar employee or any external party) who seeks to report a potential violation of Caterpillar's Policies and Procedures, Caterpillar's Code of Conduct, or any violation of law (including violations of the German Supply Chain Due Diligence Act).

**Complaint channels:** Phone, web form, email. All complaints can be made anonymously.

**Stages of the complaint procedure:** Initial review of complaint, confirmation of receipt, inform reporting party of next steps in procedure, evidence gathering, remediation (if necessary), and closure.

**Amicable dispute settlement option:** None.

**Who are the contact persons for reporting:** Office of Business Practices, Caterpillar Energy Solutions GmbH Human Rights Officer, Human Resources Personnel, Legal Department, or Chief Compliance Officer.

**Protection against disadvantage or punishment:** Caterpillar has a no retaliation policy.

**In language:** Available in 26 languages

**Communication materials:** Posters, codeofconduct.cat.com and caterpillar.com websites, employee handbooks (in language)

**Aptitude, qualifications, and availability:** 24/7/365 availability for reporting violations. Complaints are reviewed by an internal team comprised of Compliance & Ethics professionals, Human Resources and Legal Professionals, and the Caterpillar Energy Solutions GmbH Human Rights Officer.

**Impartiality:** All OBP Helpline matters are managed confidentially and impartially.

**Care for Caller:** Immediate, initial, and interim responses are sent to the reporting party from intake to closure.

**Confidentiality of Identity:** Reporting parties can elect to remain anonymous or provide personal identifying information. All information received is held in strict confidence with visibility only to those with a need to know so that the concern can be addressed efficiently and effectively.

**No retaliation:** Caterpillar will not take any action against the reporting party as a result of raising an ethical issue in good faith. Also, Caterpillar does not tolerate any reprisal by any individual against an employee for raising a concern or making a report in good faith.