

Joseph E. Creed
Chief Executive Officer
Caterpillar Inc.
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Irving, TX 75039
United States

B4Ukraine 

January 30, 2026

Dear Mr. Creed and the Caterpillar Leadership Team,

We write to you as [B4Ukraine](#), a coalition of Ukrainian and international civil society organizations committed to curbing the financial support that fuels Russia's brutal invasion of Ukraine. We are writing to raise concerns about media and industry reports raising serious concerns that [Caterpillar's](#) post-2022 restructuring of its Russian business may have resulted in ongoing financial flows, directly or indirectly, to the Russian economy.

We call on Caterpillar to:

- Immediately cease operations and completely exit the Russian market.
- Refrain from any future business, trade, or investment in Russia until Russia ends its war against Ukraine, territorial integrity of Ukraine is restored, and accountability imposed for war crimes and the destruction of Ukrainian infrastructure and property.
- Ensure that any re-engagement with the Russian market occurs only after all of the following conditions are met:
 - Ukraine's sovereignty and complete territorial integrity are restored, as recognized by international law.
 - Reparations are paid in full for all damages caused by Russian aggression, covering infrastructure, economic losses, and human suffering.
 - Accountability is imposed for violations of international law, including the crime of aggression, war crimes, and crimes against humanity.

Following the full-scale invasion of Ukraine, [Caterpillar](#) decided to suspend its manufacturing and commercial operations in Russia in 2022 and later pursued an exit from the market by transferring or selling its Russian subsidiaries to local owners. These entities were formally restructured and removed from Caterpillar's direct control through 2023 and 2024, leading to a sharp reduction in reported revenues. In 2024, Caterpillar-manufactured equipment and spare parts continued to be delivered into Russia through a UK-based dealer despite the company's formal exit from the Russian market and sanctions prohibitions. Journalists reported that in the first three months of 2024 more than [\\$24 million worth](#) of Caterpillar products, including engines, parts for loaders, generators, pumps, and other components, entered Russia, suggesting that sanctioned equipment was still finding its way into the country through intermediary channels.

Recent [investigative reporting](#) paints a troubling picture of Caterpillar Inc.'s prolonged and opaque exit from Russia, suggesting that the company's final divestment was marked by conflicting transactions, significant undisclosed losses, and potential sanctions risks. According to reporting by RBC, Kommersant, and other outlets, Caterpillar entered into competing sale agreements in 2025 for four Russian subsidiaries, ultimately proceeding with a heavily discounted transaction involving

Investment Solutions LLC, a Balchug Capital affiliate, despite prior contractual commitments and ongoing litigation with another buyer. The reported sale price implies a substantial write-down of roughly \$150 million and has raised concerns about whether material losses were properly disclosed to investors. More seriously, the reporting alleges that Caterpillar supported a Russian government approval process that enabled the transfer of assets to entities linked to sanctioned industrial groups, involved a documented payment to the Russian state budget, and may have facilitated the reactivation of assets for the benefit of sanctioned persons.

Under the [UN Guiding Principles](#) on Business and Human Rights and the [OECD](#) Guidelines for Multinational Enterprises on Responsible Business Conduct, operating in conflict affected and high risk contexts requires heightened, risk based due diligence, strong governance oversight, and clear public accountability for how a company prevents and mitigates harm linked to its operations and business relationships. Against that standard, the reported opacity and prolonged entanglements surrounding Caterpillar's Russia operations are difficult to reconcile with the expectation that a company identify and address adverse human rights impacts that it may cause, contribute to, or be directly linked to through business relationships.

In a war context where revenue, assets, and industrial capability can directly sustain a belligerent state's capacity to commit abuses, responsible conduct is not satisfied by formal divestment alone, because the UNGPs and OECD framework both emphasize ongoing due diligence, responsible disengagement, and transparency about material risks and mitigation measures. The [report's](#) allegations that Caterpillar supported approval processes for asset transfers that involved payments to the Russian state, engaged in opaque and conflicting transactions, and enabled the transfer of assets to intermediaries linked to sanctioned or high-risk actors raise serious concerns that the company may have failed to prevent foreseeable harm in a context where economic activity directly sustains a war marked by widespread human rights violations.

While Caterpillar no longer operates its own business in Russia under direct ownership, Caterpillar products continue to appear in Russia via intermediaries, as reporting shows that Caterpillar equipment and spare parts were delivered into the country through third-party dealers even after the company's formal exit, underscoring serious deficiencies in Caterpillar's sanctions compliance, human rights due diligence, and its failure to prevent its products from continuing to enable Russia's war economy.

In light of the above, we are writing to ask Caterpillar to clarify the following:

- Can Caterpillar clarify whether the continued sale, distribution, or delivery of Caterpillar-branded equipment and spare parts into the Russian Federation following its announced exit was authorized, approved, or otherwise permitted by the company, including through former subsidiaries, dealers, licensees, or other third-party intermediaries, and how such activity aligns with Caterpillar's human rights commitments under the UN Guiding Principles on Business and Human Rights?
- What are Caterpillar's current policies, intentions, and governance arrangements with respect to Russia, including oversight of former subsidiaries, ongoing contractual relationships, post-exit asset transfers, and third-party dealers, and how are these arrangements designed to prevent Caterpillar from being directly linked to adverse human rights impacts through business relationships?
- How has Caterpillar identified, assessed, and prioritized the heightened human rights risks associated with continued market presence through intermediaries and post-exit transactions in

Russia, particularly in the context of an ongoing armed conflict marked by widespread and well-documented violations of international humanitarian and human rights law?

- What enhanced human rights, sanctions, and supply-chain due diligence measures has Caterpillar implemented, in line with UNGPs 17–21 and the OECD Guidelines, to prevent, mitigate, and account for the risk that its products, technologies, or transferred assets may contribute, directly or indirectly, to Russia’s war economy?
- How does Caterpillar exercise and escalate its leverage over distributors, intermediaries, buyers of former assets, and other business partners connected to Russia to ensure effective end-user and end-use controls, prevent diversion or circumvention, and ensure compliance with sanctions, export controls, and Caterpillar’s own human rights standards?
- How does Caterpillar ensure transparency and accountability in line with UNGP 21, including through public disclosure of Russia-related transactions, sanctions and human rights risk assessments, board-level oversight, and meaningful engagement with affected stakeholders and civil society regarding its exit from Russia and the continued presence of Caterpillar products in the market?

We urge Caterpillar to immediately cease any remaining commercial activity connected to the Russian Federation and to take concrete, verifiable steps to ensure that its products, assets, and business relationships no longer contribute, directly or indirectly, to Russia’s war economy.

We would be pleased to discuss these matters in greater detail and therefore invite you to a meeting. Should you wish to participate in a meeting with Ukrainian and international civil society representatives, please confirm your availability by **February 13, 2026**. Kindly note that after this date, this letter and any responses will be published on the B4Ukraine website.

Sincerely,

The B4Ukraine Coalition