**Caterpillar response to investor letter regarding US Govt’s. Burma reporting requirements**

*Business & Human Rights Resource Centre invited Caterpillar to respond to* [*a letter*](http://crn.eiris.org/files/Joint%20Investor%20Letter%20to%20Caterpillar%20on%20Burma_Jun%202015.pdf) *from EIRIS Conflict Risk Network and a group of investors calling for it to produce timely robust reports under the US Government’s Burma reporting requirements. Caterpillar sent the response below (which is the response that was sent to EIRIS Conflict Risk Network).*

*Additional company responses to similar letters are* [*here.*](http://business-humanrights.org/en/investors-call-on-3-companies-to-submit-robust-reports-under-us-govts-burma-reporting-requirements)

7 July 2015  
  
Dear Ms. Mulvey,  
  
Thank you and the other signatories for your letter dated June 23, 2015, to Caterpillar Chairman and CEO Doug Oberhelman. I am pleased to respond on his behalf.   
  
To date, Caterpillar Inc. and its subsidiaries have made no investments in Myanmar, so the reporting requirements you mention in your letter do not apply. We faithfully abide by rules and regulations established by the US government for American companies doing business in Myanmar and by the Myanmar government.   
  
The appearance of the Caterpillar name or of Caterpillar machines and engines in Myanmar that may have led to your conclusion is due to an independent dealer selling Caterpillar machines and engines in country.     
  
In any event, 31 CFR 537.311's definition of "new investment" is clear that it does not include the sale of goods. Since Caterpillar is in full compliance with the law, we trust you will withhold publishing anything that states or implies that Caterpillar has made investments in Myanmar or is otherwise not in compliance with the law.     
  
Best regards,   
William Oei   
Asia Pacific Corporate Affairs