1- PURPOSE

As a leading supplier of locomotives, value-added, technology-based equipment, systems, and services for the global freight rail and passenger transit industries, Wabtec Corporation ("Wabtec" or the "Company") is committed to the responsible sourcing of minerals—i.e., sourcing done in an ethical and sustainable manner that safeguards the human rights of everyone in our global supply chain.

Armed groups operating in the Democratic Republic of the Congo ("DRC") and DRC-Adjoining Countries have engaged in conflict and human rights abuses, fueled through proceeds from the mining or trade of so-called "conflict minerals" or "3TGs" (i.e., tin, tantalum, tungsten and gold). Similar concerns have arisen surrounding the social and environmental impacts of the extraction of additional minerals, identified in Appendix A to this policy, including child labor and unsafe working conditions in artisanal mines in conflict-affected and high-risk areas ("CAHRAs").

We recognize the potential risks and adverse impacts associated with extracting, trading, handling, and exporting minerals from CAHRAs. We further recognize that we have the responsibility to respect human rights and not contribute to conflict. We implement this policy in accordance with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict Affected and High Risk Areas ("OECD Due Diligence Guidance") in order to address responsible sourcing of minerals.

This policy is consistent with Wabtec's Human Rights Policy, Supplier Code of Conduct, and respect for human rights in our own operations and across our global supply chain, as well as with the OECD Due Diligence Guidance.

2- SCOPE

The Responsible Minerals Sourcing Policy applies to the entire Wabtec enterprise, including subsidiaries, majority-owned joint ventures, and newly acquired companies. We inform and provide training to our employees about this policy. We also require the suppliers, contractors, consortium partners, and consultants (collectively "Suppliers") in our global supply chain to adopt and enforce the concepts in this policy.

3- POLICY STATEMENT

Wabtec is committed to conducting operations in a manner consistent with responsible minerals sourcing and in compliance with applicable laws and regulations regarding conflict minerals.

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Consistent with our commitment, and in accordance with applicable law and practice, we will:

- Inform Suppliers about this Responsible Minerals Sourcing Policy and its relationship to the Wabtec Supplier Code of Conduct.
- Work with Suppliers to strive to understand the chain of custody for conflict minerals at the smelter or refiner level.
- Take measures to source parts and components from Suppliers that are "Conflict-Free," as defined herein. These measures include adopting, disseminating, and incorporating this policy in related purchase orders, contracts, and other appropriate agreements with Suppliers as they are entered, revised, or renegotiated.
- Work with direct Suppliers to track and improve their performance in sourcing minerals from their suppliers and sub-suppliers that are validated as being "Conflict-Free" in accordance with a national or internationally recognized due diligence framework, such as the OECD Due Diligence Guidance.

1. Expectations for Business Partners

Wabtec has a large and diverse network of Suppliers. Our relationship with our Suppliers is defined by Contracts, as well as our Supplier Code of Conduct (the "Code"). Pursuant to the Code, Wabtec is committed to unyielding integrity and high standards of business conduct in everything we do, especially in our dealings with Suppliers. Wabtec bases its Supplier relationships on lawful, efficient and fair practices, and Suppliers must adhere to applicable laws and regulations in their business relationships in connection with their activities for Wabtec, as set out in the Code. Suppliers are responsible to ensure that they and their employees, workers, representatives, suppliers, and subcontractors comply with the standards of conduct set out in the Code, all applicable laws and regulations, and other contractual obligations to Wabtec.

With regards to responsible minerals sourcing, our global Suppliers are required to:

- Supply only "Conflict-Free" materials to Wabtec, per Wabtec's relevant Contract agreement templates and purchase order terms & conditions.
- Be transparent and responsibly source from the DRC, DRC-Adjoining Countries, and CAHRAs, in order to avoid de facto embargoes.
- Adopt policies and due diligence management systems consistent with OECD Due Diligence Guidance to identify, prevent, mitigate and, where appropriate, remediate risks associated with minerals, including 3TGs and those minerals listed in Appendix A to this policy, as well as require their suppliers to adopt similar policies and practices.
- Provide Wabtec with information on the presence of requested minerals, including 3TGs and those minerals listed in Appendix A to this policy, in their products, and data on the smelters and refiners in their respective supply chains, consistent with the industry standard for Supply Chain Transparency provided in the Conflict Mineral Reporting Template ("CMRT") or Extended Minerals Reporting Template ("EMRT") as developed by the Responsible Minerals Initiative ("RMI").
- Procure, directly or indirectly, from smelters and refiners validated under the Responsible Minerals Assurance Process ("RMAP") of RMI or other recognized third-party audit /

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validation programs (for Suppliers whose sourcing originates from the DRC, DRC-Adjoining Countries, or other CAHRAs).

- Suspend or discontinue engagement with up-stream suppliers after failed attempts at mitigation, remediation, or non-conformance with this policy.
- Collaborate with others on cross-industry efforts, such as with RMI, to support responsible minerals sourcing, including on-going education and training.
- Cooperate with Wabtec in evaluating compliance with these requirements.

If Wabtec identifies a reasonable risk that a Supplier is violating our commitments set forth in this policy, Wabtec reserves the right to require such supplier to commit to and implement a corrective action plan within a reasonable timeline. Furthermore, Wabtec reserves the right to conduct audits to ensure compliance its Supplier Code of Conduct, applicable laws and regulations, and this policy.

2.Reporting

How to Raise a Question or Concern: Subject to local laws and any legal restrictions applicable to such reporting, each Wabtec Supplier is expected to inform Wabtec promptly of any concern related to this Code affecting Wabtec, whether or not the concern involves the Supplier, as soon as the Supplier has knowledge of such an occurrence. Wabtec Suppliers also must take such steps as Wabtec may reasonably request to assist Wabtec in the investigation of any such occurrence involving Wabtec and the Supplier. If Supplier's work is related to a U.S. government contract, Supplier must notify Wabtec of any alleged non-conformance with this Supplier Code of Conduct.

I. **Define your question/concern**: Who or what is the concern? When did it arise? What are the relevant facts?
II. **Prompt reporting is crucial** — A question or concern may be raised by a Wabtec Supplier as follows:
    - By discussing with a cognizant Wabtec Manager; OR
    - By contacting any Compliance Resource (e.g., Wabtec legal counsel or auditor); OR
    - By contacting Speak Up Wabtec! at speakupwabtec@wabtec.com
III. **Wabtec policy forbids retaliation** against any person reporting such a concern.

4- DEFINITIONS (IF APPLICABLE)

- **Conflict-Affected and High-Risk Areas ("CAHRAs")** – As defined under the EU Conflict Minerals Regulation, CAHRAs are areas in a state of armed conflict or fragile post-conflict, as well as areas witnessing weak or non-existent governance and security, such as failed states, and widespread and systematic violations of international law, including human rights abuses.
- **Conflict-Free** – Minerals that are from recycled or scrap sources or that do not directly or indirectly finance armed groups through mining or mineral trading in the Democratic

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Republic of Congo, DRC-Adjoining Countries, or any other CAHRAs as determined by regulatory bodies and as applied by RMI.

- **Conflict Mineral Reporting Template ("CMRT")** – A free, standardized reporting template developed by RMI that facilitates the transfer of information through the supply chain regarding mineral country of origin and the smelters and refiners being utilized. The template also facilitates the identification of new smelters and refiners to potentially undergo an audit via the RMI RMAP.
- **Extended Minerals Reporting Template ("EMRT")** – A free, standardized reporting template developed by RMI to identify pinch points and collect due diligence information in the cobalt and mica supply chains.
- **Democratic Republic of the Congo ("DRC")** / **DRC-Adjoining Countries** – The Central African country of the DRC, as well as the following countries bordering it: Angola, Burundi, Central African Republic, Congo Republic, Rwanda, Sudan, Tanzania, Uganda, and Zambia.
- **Responsible Minerals Assurance Process ("RMAP")** – The flagship program of RMI that uses an independent third-party assessment of smelter/refiner management systems and sourcing practices to validate their processes for responsible mineral procurement.
- **Responsible Minerals Initiative ("RMI")** – One of the most utilized and respected resources for companies addressing issues related to the responsible sourcing of minerals in their supply chains.

5- SPECIAL SITUATIONS / EXCEPTIONS (IF APPLICABLE)

none

6- ROLES AND RESPONSIBILITIES (IF APPLICABLE)

none

7- CONTACTS (IF APPLICABLE)

The **Contacts** section highlights the department or individual to contact for questions or clarification of the policy.

Department (or Individual)	Contact Information
Dawn White	Dawn.White@wabtec.com

8- REFERENCES

- Wabtec Code of Conduct and Business Ethics
- Organization for Economic Co-operation and Development Guidelines

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- Responsible Minerals Initiative Conflict Minerals Reporting Template
- Wabtec Human Rights Policy
- Wabtec Supplier Code of Conduct

9- REVISION HISTORY

The **Revision** History section details the sequence of revisions.

Date	Revision	Reason / Description
2013	Initial Policy	
1/19/2023	Revised Policy	Updated to conform to Wabtec policy template, clarify company commitments and supplier expectations, and broaden scope of covered minerals.
09/28/2023	Rev 3.0	Transferred content to template Rev 2.0 Updated section 3: website for Speak Up Wabtec corrected. Updated section 5: none Updated section 6: none Updated section 7: current contacts for policy Updated section 10: updated names and title changes

10- REVIEW AND APPROVAL

The **Review and Approval** section identifies the authorities and the names of the persons preparing, verifying and approving the policy.

	Business Unit	Name	Function
Prepared by:	Functional Excellence & Business Intelligence	Dawn White, Senior Sourcing Initiatives Specialist	Sourcing
Verified & approved by:	EHS & Regulatory Compliance	Jennifer Shea, Corporate Vice President, Global EHS & Regulatory	Corporate Legal
	Functional Excellence & Business Intelligence	Dennis Peters, VP Functional Excellence & Business Intelligence	Sourcing
Released by:	Functional Excellence &	Dennis Peters, VP Functional Excellence & Business Intelligence	Sourcing

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	Business Intelligence		

Appendix A

Scope of Additional Minerals:

1. Cobalt
2. Mica

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