1- PURPOSE

The Purpose of this Policy is to outline the expectations and responsibilities when it comes to compliance and business ethics, as applicable to any Wabtec Supplier (as defined herein). Wabtec Corporation, and its worldwide affiliates (collectively referred to herein as "Wabtec") is committed to unyielding integrity and high standards of business conduct in everything we do, especially in our dealings with suppliers, contractors, consortium partners and consultants (collectively "**Suppliers**"). Wabtec bases its Supplier relationships on lawful, efficient and fair practices, and Suppliers must adhere to applicable legal and regulatory requirements in their business relationships as set out in this Code of Conduct for Suppliers, Contractors and Consultants (the "**Code**") in connection with their activities for Wabtec. Suppliers are responsible to ensure that they and their employees, workers, representatives, suppliers and subcontractors comply with the standards of conduct set out in this Code, all applicable local laws and regulations, and other contractual obligations to Wabtec. Please contact the Wabtec manager you work with or any Wabtec Compliance Resource **(e.g., Wabtec legal counsel or auditor)** if you have any questions about this Code or the standards of business conduct that all Wabtec Suppliers must meet. Wabtec reserves the right to audit compliance with this Code of Conduct.

2- SCOPE

The Supplier Code of Conduct applies to all Suppliers of Wabtec Corporation, and its worldwide affiliates (collectively referred to herein as "Wabtec").

3- POLICY STATEMENT

You, as a Supplier to Wabtec, agree:

Sustainable Sourcing: Wabtec expects Suppliers to consider environmental, social, and governance throughout the lifecycle of the relationship. Suppliers may be required to complete self-assessments to rate the performance against this Supplier Code of Conduct. The supplier shall agree to collaborate and continuously improve on sustainability in the supply chain as essential to conducting business. The supplier understands that Wabtec may carry out an audit to ensure performance and monitor progress.

Fair Employment Practices: To (i) observe applicable laws and regulations governing wages and hours, recruitment and employment contracts; (ii) allow workers to choose freely whether to organize or join associations of their own choosing for the purpose of collective bargaining as provided by local law or regulation; (iii) prohibit discrimination against any Supplier personnel, Wabtec personnel, third-party vendor or others with whom the Supplier may interact as part of their scope of work because of ancestry, age, color, creed, disability, ethnicity, gender, gender identity or expression, genetic information, marital status, national origin, pregnancy, race, religion, sex, sexual orientation, military or veteran status, or other categories, characteristic or basis protected by applicable federal, country, or local law; harassment on the basis of those same protected categories previously defined; and, retaliation; (iv) upon end of employment, reimburse return transportation costs for workers recruited from outside the country; (v) not charge workers recruitment fees or utilize firms charging workers such fees; (vi) not utilize fraudulent or misleading recruitment practices; (vii) not hold or destroy a worker's identity or immigration documents; and (viii) provide workers with terms and conditions of employment in a language the worker understands.

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Environment, Health & Safety: To (i) comply with applicable environmental, health and safety (EHS) laws and regulations, including Wabtec's contractor EHS requirements; (ii) provide workers a safe and healthy workplace; and (iii) not to adversely affect the local community. If housing is provided or arranged, it must meet host country safety standards. (iv) Suppliers to provide data from its supply chain to Wabtec when requested, on a platform to be designated by Wabtec. This may include requests for regulations such as REACH, RoHS, TSCA, Prop65, and any other regulation that Wabtec must abide by.

Human Rights: To (i) respect human rights of your employees and others in your business operations and your activities for Wabtec and abide by Wabtec's Human Rights Policy (ii) not to employ child labor; and (iii) not to use forced, prison or indentured labor, or workers subject to any form of physical, sexual or psychological compulsion, exploitation or coercion, or to engage in or abet trafficking in persons. (iv) provide supporting data on your supply chain policies/procedures for human rights when requested, on a platform to be designated by Wabtec.

Responsible Mineral Sourcing: To (i) abide by Wabtec's Responsible Minerals Policy and adopt policies, procedures, and establish systems to procure tantalum, tin, tungsten, gold, and other rare earth minerals from sources that have been verified as conflict free and ensure that their sub-suppliers do the same; (ii) provide supporting data on your supply chain for tantalum, tin, tungsten, gold, and other rare earth minerals to Wabtec when requested, on a platform to be designated by Wabtec.

Working with Governments, Improper Payments and Dealings with Wabtec Employees and Representatives: To (i) maintain and enforce a policy requiring adherence to lawful business practices, including a prohibition against bribery and kickbacks; (ii) not to engage in bribery, kickback or any other action that could be deemed as improper performance, and (iii) provide supporting data (of compliance) to Customer when requested.

Competition Law: Not to share or exchange any price, cost or other competitive information or engage in any collusive conduct with any third party with respect to any proposed, pending, or current Wabtec procurement.

Intellectual Property: To respect the intellectual and other property rights of Wabtec and of third parties, including all patents, trademarks, and copyrights.

Security and Privacy: To (i) comply with applicable privacy laws and regulations; (ii) implement and maintain physical, organizational and technical measures ("Safeguards") to protect the security and confidentiality of the data of Wabtec employees, customers, and suppliers (collectively, "**Wabtec Data**") in order to prevent accidental, unauthorized or unlawful destruction, alteration, modification, loss, misuse, or l processing of Wabtec Data; and (iii) protect Supplier operations and facilities against exploitation by criminals or terrorists.

Trade Controls & Customs Matters: Not to transfer Wabtec technical information to any third party without the express, written permission of Wabtec, and to comply with all applicable trade control laws and regulations in the import, export, re-export or transfer of goods, services, software, technology, or technical data including any restrictions on access or use by unauthorized persons or entities.

Controllership and Tax Law: To ensure that all invoices and any customs or similar documentation submitted to Wabtec or governmental authorities or audited by third parties in connection with transactions involving Wabtec accurately describe the goods and services provided or delivered and the price thereof, to ensure that all documents, communications and accounting are accurate and honest and not to take or participate in any actions that may be viewed as tax evasion or the facilitation of tax evasion.

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.

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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)

Term	Definition
Suppliers	Wabtec's suppliers, contractors, consortium partners and consultants collectively
Code	Code of Conduct in connection with supplier activities for Wabtec
Wabtec Compliance Resource	Wabtec Legal Counsel or Auditors
EHS	Environmental Health and Safety: Laws, Regulations, Support Teams at Wabtec
Safeguards	Implementation and maintenance of physical, organizational, and technical measures to protect the security and confidentiality of the data of Wabtec employees, customers, and suppliers
Wabtec Data	Data of Wabtec employees, customers, and suppliers collectively

5- SPECIAL SITUATIONS / EXCEPTIONS (IF APPLICABLE)

None

6- ROLES AND RESPONSIBILITIES (IF APPLICABLE)

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R- Responsible **A- Approver** **S- Support** **C- Consult** **I- Inform**	Suppliers	Wabtec Sourcing Initiatives Team	Wabtec Compliance Team	Wabtec EHS Team	Wabtec Human Resources	Wabtec Legal Counsel	Wabtec Cyber Security Team	Wabtec Customs Team
Sustainable Sourcing	R	S, C						
Sustainable Sourcing Audit	R		S, C					
Fair Employment Practices	R		S, C					
EHS	R			S, C				
Human Rights	R				S, C			
Responsible Mineral Sourcing	R	S, C						
Working with Governments, Improper Payments and Dealings with Wabtec Employees and Representatives	R		S, C					
Competition Law	R					S, C		
Security and Privacy	R						S, C	
Trade Controls & Customs Matters	R							S, C
Controllership and Tax Law	R					S, C		
Raise a Question or Concern	R	S	S	S	S	S	S	S

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
Sourcing Initiatives	Dawn.White@Wabtec.com

8- REFERENCES

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The **References** section informs the reader of other related policies, standard operating procedures, instructions, or forms.

- WC-P-HR-003 Human Rights Policy
- WC-P-SRC-002 Wabtec Responsible Minerals Policy

9- REVISION HISTORY

Date	Revision	Reason / Description
04/11/2023	Initial Policy	Global Policy Creation
09/25/2023	2.0	Transfer the content to template Rev 2.0 Section 1: Updated per Joanne Rodriguez Section 3: "Fair Employment Practices" Expanding EEO statements and inclusive practices per Joanna Rodriquez Section 3: Updated link for Speak Up Section 7: Updated Contact Information Section 10: Updated Review and Approval Information

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:	Sourcing	Dawn White	Senior Sourcing Initiatives Specialist
Verified & approved by:	Sourcing	Dawn White	Senior Sourcing Initiatives Specialist
	Quality	Brett DeGonia	Supplier Quality
	Legal	Jennifer Shea	EHS Legal and Remediation
	Legal	Dawn Rooth Schultz	Executive Counsel-Sourcing
	HR/Legal	Joanna Rodriquez	Director Legal-Labor & Employment
	Sourcing	Dennis Peters	Vice President Sourcing Initiatives
Released by:	Sourcing	Dennis Peters	Vice President Sourcing Initiatives

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