

 <b>Artificial Intelligence ("AI") Policy</b>	Document:	<b>Policy</b>
	Reference:	WC-P-SC-025
	Revision:	1.0
	Effective Date:	2/12/2025

## 1- PURPOSE

The AI Policy sets forth Wabtec Corp.'s ("Wabtec's") principles concerning the use of artificial intelligence ("AI") technologies across the organization. The AI Policy defines authorized and prohibited uses related to the development, deployment, and application of AI models, systems, and services used for Wabtec internal purposes.

It includes the use of Traditional AI ("TradAI") and Generative AI ("GenAI") technologies, models and products.

AI refers to a broad range of technologies that enable machines to perform tasks that typically require human intelligence, such as learning, problem-solving, decision-making, and natural language processing. This includes, but is not limited to, large language models ("LLM"), computer vision, predictive analytics, and autonomous systems.

The AI Policy applies to all internal use and development of AI technologies within Wabtec, excluding AI-embedded products that are sold directly to customers. Examples of AI applications and models covered by this policy include, but are not limited to GenAI such as LLMs and image generation tools in response to queries known as "prompts".

The AI Policy is designed to ensure the responsible and ethical use of AI within Wabtec, aligning with Wabtec's strategic objectives and commitment to data privacy, security, and the well-being of employees and stakeholders.

## 2- SCOPE

The AI Policy applies to all Wabtec officers and employees, including those employed by Wabtec-controlled subsidiaries and Wabtec-controlled joint ventures ("Company Personnel") and Wabtec's third parties, such as agents, suppliers, vendors, contractors and joint venture partners ("Third Parties") who are properly authorized by Wabtec to access or use Wabtec-operated or Wabtec-supplied information technology, whether on company-owned or personal devices and whether accessed within Wabtec's network or externally (collectively, "Users").

The AI Policy covers the development, deployment, and use of AI technologies across Wabtec's operations, excluding AI-embedded products that are sold directly to customers. The AI Policy ensures that all Users, both internal and external, adhere to Wabtec's principles and guidelines for the responsible and ethical application of AI within the organization.

## 3- POLICY STATEMENT

1. When using AI technologies for Wabtec business (e.g., to generate answers, create work product, or perform other business tasks for Wabtec), Users must follow the AI Policy. Users must also adhere to all applicable laws and all relevant Wabtec security standards and company policies, including but not limited to:
  - a. Acceptable Use Policy
  - b. Information Classification Policy
  - c. Information Security Policy
  - d. Intellectual Property and Confidential Information Policy

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- e. Privileged Access Policy
- f. Access Authorization & Authentication Policy
- g. Information Security Awareness & Training Policy

This section ensures that the use of AI within Wabtec's operations is subject to the same security, privacy, and compliance requirements as other information technology and business activities. It establishes a consistent framework for the responsible and ethical application of AI across the organization, regardless of the specific AI technologies or use cases involved.

## 2. AI Strategy Ownership

- a. Users may only use Wabtec-approved AI models, applications and services regardless of being hosted on-premises (i.e., managed and located by Wabtec) or by a public cloud or third-party SaaS service provider, to conduct Wabtec Business ("Approved Services"). A link to a list of Approved Services is located in the "Reference" section of the AI Policy.
- b. The Wabtec AI governance framework which is led by the Wabtec Board of AI Strategy and includes members from several Wabtec organizations is here to ensure a consistent and fast problem solving approach to managing all AI-related topics.

This includes the following responsibilities:

- **Define AI Strategy and Governance:** Establish a cohesive AI strategy and governance plan to guide the responsible adoption of AI technologies across the organization.
- **Manage AI Risks:** Proactively identify and mitigate risks associated with the use of AI tools, ensuring the protection of Wabtec's data, employees, and customers.
- **Maximize AI Value:** Facilitate the identification, prioritization, and alignment of AI use cases to drive maximum value realization for the business.
- **Adaptive AI Technology Lifecycle:** Oversee the selection, configuration, and ongoing support of AI technologies to ensure their long-term sustainability and effectiveness.
- **Promote AI Awareness:** Foster awareness and understanding of AI technologies, their opportunities, and their associated risks across the entire Wabtec organization.

- 3. The AI governance team has developed and vetted the Approved Services, so they may be used in accordance with Wabtec's applicable policies and the Approved Service's terms of use. The Approved Services may be accessed through applications or web browsers installed on Wabtec -approved computers and devices.

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#### 4. Approved access to AI

- a. The list of Approved Services may change from time to time and the current list will be maintained by the AI Governance Team
  - i. Access to Approved Services requires Approval from members identified in Wabtec AI governance Framework and access will be managed through Wabtec's enterprise authorization and authentication services.
  - ii. Approved Services have been developed and vetted by the members identified in Wabtec AI governance Framework and meet Wabtec's confidentiality requirements.
  - iii. The Approved Services list contains information on which types or classes of data can be used with a specific service. To protect the confidentiality of Wabtec information, Users must not input, disclose or share data of a higher classification than what an Approved Service is approved for.
  - iv. Link to approved services is available in reference section.
  - v. Users should leverage and make use of existing Approved Services instead of building or accessing new ones that serve the same purpose. This will enable Wabtec to reduce costs and increase benefits by:
    1. Maximizing efficiency;
    2. Minimizing duplication of efforts;
    3. Reusing existing functionalities
    4. Optimizing operational maintenance
    5. Leveraging existing investments; and
    6. Enhancing consistency across solutions.

#### 5. Unapproved Access to AI

- a. Users may not use unapproved models, applications, services or websites with AI features or use the built-in functionality of certain web browsers ("Unapproved Services") to conduct Wabtec Business. Examples in the former category include ChatGPT and DALL-E and examples in the latter category include Google Chrome/Bard. By default, a service or an applications is unapproved if not in the list of approved services and applications. A link to the list of Approved Services is located in the "Reference" section of the AI Policy.
  - i. Unapproved Services have not been developed or vetted by Wabtec for conducting Wabtec business and Users are not authorized to use Unapproved Services while conducting Wabtec business.
  - ii. Users should conclusively presume that any Unapproved Service will not protect the confidentiality of any Wabtec information (including Confidential Information and Highly Confidential Information) that is inputted, even if the particular browser, application or website purports to maintain confidentiality.

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iii. Therefore, Users must not input, disclose or share any Confidential Information or Highly Confidential Information if using Unapproved Services on their personal time, including but not limited to material non-public information ("MNPI"), intellectual property, privileged information, confidential information and proprietary, customer personal data.

b. Any evaluations, proofs of concept or trials of potential AI services for Wabtec business or Wabtec use (i.e., use cases) must be communicated to and approved by the members identified in Wabtec AI governance Framework. Teams evaluating AI use cases must maintain awareness of how Wabtec business data is used and maintained and comply with all applicable Wabtec policies.

#### 6. Employees AI awareness and regular trainings

Providing Wabtec employees with thorough training on the company's AI tools is crucial, as it ensures their skills remain up-to-date and employable in the face of technological advancements. Wabtec will provide access to training materials in a central portal, and will showcase regular update in AI world.

#### 7. General Policies

a. *Prohibited Activities:* Users must not use AI for any illegal, unethical or inappropriate activities, including but not limited to violating copyright or intellectual property rights, generating fraudulent content, spreading misinformation or engaging in hate speech. Users should exercise caution when using AI to avoid generating or sharing any content that may be biased, false, misleading, offensive, discriminatory or harmful to others.

b. *Ethical considerations:*

i. Wabtec is committed to the ethical and responsible development and deployment of AI systems. When designing, implementing, and using AI technologies, Users must consider the following key ethical principles:

1. **Fairness:** AI systems must be designed and used in a manner that promotes fairness and non-discrimination, ensuring they do not perpetuate or exacerbate biases against individuals or groups based on protected characteristics such as race, gender, age, or socioeconomic status.
2. **Transparency:** The decision-making processes and underlying logic of AI systems must be as transparent as possible, allowing for meaningful oversight and accountability. Users should be able to understand how the AI arrives at its outputs or recommendations.
3. **Accountability:** Clear lines of responsibility and accountability must be established for the development, deployment, and ongoing monitoring of AI systems. Wabtec will hold Users accountable for any misuse or unintended consequences arising from the application of AI.

c. *Privacy:* The use of AI must respect and protect the privacy of individuals, ensuring that personal data is collected, processed, and stored in accordance with Wabtec's data privacy policies and all applicable laws and regulations.

d. *Cybersecurity Practices:* Users must follow Wabtec's applicable Enterprise Information Security and IT policies when using AI, including but not limited to regularly updating passwords, using encrypted communications and avoiding downloading or installing any unauthorized software or plugins. Users should also be cautious of phishing attacks

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or other malicious activities that may target LLMs. Users should report any suspicious activities or potential security vulnerabilities related to AI to the AI Governance team immediately.

- e. *Verify Output:* Users must always verify the output of any AI search or function for accuracy and completeness. Users must never presume that the output of any AI product is reliable. AI technologies may not always produce reliable or accurate content and may even hallucinate (i.e., return non-existent or otherwise false or incomplete statements).
- f. *Potential Biases:* Users should be aware of and, if possible, identify potential biases in AI generated content, which may stem from the AI model or the data that was used to train the AI program.
- g. *Consents and Permissions:* Any Wabtec-related data that is processed or generated using AI must be handled in accordance with applicable data protection laws, regulations and Wabtec's policies, including obtaining appropriate consents and permissions for data usage as required.
- h. *Disclosure:* Any User who, in the course of conducting Wabtec business, has used AI to prepare a substantial portion of work product for review or use by someone else at Wabtec should not represent the work generated by the AI tool as being the User's own original work.
- i. *Non-Compliance:* Users must always comply with the AI Policy and other Wabtec policies when using AI to conduct Wabtec Business. Non-compliance with the AI Policy may result in disciplinary action, up to and including termination of employment or contract, as well as legal consequences in the case of any violation of laws, rules or regulations.

## 4- DEFINITIONS

1. Artificial Intelligence ("AI"): a domain of software methods and algorithms that is focused on creating systems that perform tasks that mimic or resemble human intelligence. AI systems vary in approach and include statistical and rules-based methods as well as more complex mathematical approaches – such as machine learning and deep learning - that learn to predict a Label after analyzing large amounts of training data.
2. Traditional AI ("TradAI"): An approach to artificial intelligence that relies on pre-programmed rules, logical reasoning, and symbolic representations to solve problems and perform tasks. Traditional AI systems are typically designed to excel at specific, well-defined tasks or domains, rather than exhibiting general intelligence. It commonly use Machine learning and Deep learning technologies.
3. Generative AI ("GenAI"): an AI technology that generates new output from a GenAI model, such as a LLM in response to queries known as "prompts." The models used by GenAI contain "learned" data that has been inputted into and used to train the AI. Examples include ChatGPT (text-to-text/image), GitHub Copilot (text-to-code), Midjourney (text-to-image), Copilot (code programming assistant) and ModelScope (text-to-video). Generative AI can also appear as a feature in another application, such as "Compose with AI" in Front.

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4. Wabtec AI governance framework: this framework establishes a comprehensive and consistent process for the responsible development, deployment, and monitoring of AI initiatives across the organization. This governance approach ensures that all AI use cases adhere to strict security, privacy, and ethical standards, while also driving cost-effective and scalable implementation of these transformative technologies. This Framework is defined and agreed by a group of senior Wabtec leaders, referred to as the Board of AI Strategy.
5. Approved Services: GenAI applications or websites that have been approved by Wabtec to conduct Wabtec business.
6. Unapproved Services: Applications or websites with GenAI features or use of the built-in functionality of certain web browsers that have not been approved by Wabtec to conduct Wabtec business.
7. Bias: Systematic errors or inaccuracies in AI models resulting from skewed or unrepresentative training data
8. Responsible AI: Ethical and transparent use of artificial intelligence technologies that prioritize fairness, accountability, and societal well-being
9. Synthetic Data: Synthetic Data is created by GenAI models trained on real world data samples. Once trained, the GenAI model can create statistically identical, Synthetic Data.
10. Wabtec Business: Tasks performed by Users that are related to the operation of Wabtec's business or produced for other Users related to Wabtec's business (e.g., to generate answers, create work product or perform other business tasks for Wabtec).

## 5- SPECIAL SITUATIONS/EXCEPTIONS

If you are unsure about these requirements, you should seek guidance from the Wabtec AI governance team. The current list of Wabtec AI governance team members is maintained on Wabtec's SharePoint ([ai.wabtec.com](https://ai.wabtec.com)) under the section titled "Resources" > "AI Governance".

## 6- ROLES AND RESPONSIBILITIES

1. The Wabtec AI governance framework is defined and maintained on a reference document titled "Wabtec AI governance", which is located on Wabtec's Sharepoint site at [ai.wabtec.com](https://ai.wabtec.com) under the section titled "Resources" > "AI Governance".
2. *Synthetic data management:* For Synthetic Data, the Wabtec AI governance team must maintain a comprehensive synthetic data management program to ensure responsible management of Wabtec's Synthetic Data, including:
  - a. Establishing internal and external agreements for sharing Synthetic Data;
  - b. Ensuring Wabtec complies with relevant Wabtec policies and applicable laws and regulations;
  - c. Establishing governance structures for Synthetic Data management (data integration, transformation, storage, security encryption (e.g., transit in-motion));

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- d. Maintaining audit logs and monitor Synthetic Data usage; and
  - e. Maintaining comprehensive documentation on Synthetic Data management.
3. *Data Classification & Labelling:* Data inputted into and produced by AI should be classified in accordance with Wabtec's appropriate Data Classification Standard. In addition, data may be categorized with relevant tags, such as "synthetic" or "real" and may include a brief description about the data, including its purpose and limitations.

## 7- CONTACTS

Questions are encouraged and should be directed to the Wabtec AI governance team. The current list of Wabtec AI governance team members is maintained on Wabtec's SharePoint ([ai.wabtec.com](https://ai.wabtec.com)) under the section titled "Resources">"AI Governance."

## 8- REFERENCES

- WC-P-LG-002 – Code of Business Conduct and Ethics
- WC-P-SC-008 - Acceptable Use Policy
- WC-P-SC-010 - Information Classification Policy
- WS-S-SC-010 – Data Classification Standard
- WC-P-SC-001 - Information Security Policy
- WC-P-SC-022 – Privileged Access Policy
- WC-S-SC-001 – Access Authorization and Authentication Policy
- WC-P-SC-005 – Information Security Awareness & Training Policy
- WC-P-LG-012 – Intellectual Property and Confidential Information Policy
- Wabtec AI Governance Team, located on Wabtec's Sharepoint at <https://wabtec.sharepoint.com/sites/AIWABTEC/> under the section titled "Resources" > "AI Governance".
- Wabtec Approved list of AI services and applications, located on Wabtec's Sharepoint at <https://wabtec.sharepoint.com/sites/AIWABTEC/> under the section titled "Resources" > "AI Approved Solutions."

## 9- REVISION HISTORY

Date	Revision	Reason / Description
2/12/2025	1.0	Initial Release

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## 10- REVIEW AND APPROVAL

	<b>Business Unit</b>	<b>Name</b>	<b>Function</b>
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Prepared by:	Corporate	David Poulliott	Director, Enterprise Cloud (ECT)
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Prepared by:	Corporate	Raman Johar	Director, Wabtec Enterprise Architecture
Prepared by:	Corporate	Rick Smith, Benjamin Charles, John Reece, Andrew Mc Veagh, Sofia Burbano, Kopal Raj, John Hudson	Wabtec IT leadership
Prepared & approved by:	Corporate	Scott Brady	Chief Compliance Officer
Verified & approved by:	Corporate	AI Governance Board	Responsible for AI strategy
Released by:	Corporate	AI Governance Board	Responsible for AI strategy

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# Publication Report

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