



# Supplier Code of Conduct

Document:	<b>Policy</b>
Reference:	WC-P-PUR-002
Revision:	1.0
Effective Date:	09/02/2020

## 1- SCOPE

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

## 2- POLICY STATEMENT

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.

## 3- POLICY EXPECTATIONS

**You, as a Supplier to Wabtec, agree:**

**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, harassment 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.

**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.

**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; (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) adopt policies and establish systems to procure tantalum, tin, tungsten, and gold from sources that have been verified as conflict free; and (v) provide supporting data on your supply chain for tantalum, tin, tungsten, and gold 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 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.

## 4- 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 <https://speakupwabtec.ethicspoint.com>**

**III. Wabtec policy forbids retaliation** against any person reporting such a concern.

# Policy Name

Reference: WC-P-PUR-002  
Revision: 1.0

## 5- CONTACTS

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

Department (or Individual)	Contact Information
Director of Sourcing Infrastructure & Compliance	<a href="mailto:Thomas.salva@wabtec.com">Thomas.salva@wabtec.com</a>
Senior Compliance Specialist	<a href="mailto:Jen.zaczyk@wabtec.com">Jen.zaczyk@wabtec.com</a>

## 6- REVISION HISTORY

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

Date	Revision	Reason / Description
2-Sep-20	Initial Policy	

## 7- REVIEW AND APPROVAL

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

	Name	Function
Prepared by:	Jen Zaczyk, Senior Compliance Specialist	Legal
Verified by:	Tom Salva, Senior Sourcing Initiatives Staff Manager	Sourcing
	Jennifer Hills, Executive - Supplier Quality Engineering	Quality
	Jennifer Shea, Executive - EHS Legal and Remediation	Legal
	Dawn Rooth Schultz, Executive Counsel - Sourcing	Legal
Approved by:	Brian Shepard, Chief Procurement Officer	Sourcing