Wabtec Conflict Minerals Policy

Wabtec Corporation (“Wabtec”) has developed and implemented this policy to provide guidance concerning the Dodd-Frank Wall Street Reform and Consumer Protection Act, Section 1502. The matters covered in the policy are of the utmost importance to Wabtec and are essential to the Company’s ability to conduct business in a global marketplace at the highest ethical and legal standards.

The ongoing conflict in the Democratic Republic of the Congo (DRC) is fueled in part from the trade of “conflict minerals”, which are defined as tantalum, tin, tungsten, and gold or any of their derivatives.

Wabtec is committed to avoiding the use of conflict minerals that directly or indirectly finance or benefit armed groups in the DRC or adjoining countries.

Wabtec is committed to complying with the requirements of the Dodd-Frank Wall Street Reform and Consumer Protection Act, Section 1502, which requires companies to inquire into the origin of conflict minerals in their supply chains and report on the reasonable inquiry or due diligence they conduct to determine whether their purchase supported armed groups in the DRC.

Wabtec does not procure minerals directly and only a fraction of the world’s minerals originate from the DRC, but we are incorporating the principles of this policy into our supplier contracts and will work with our suppliers to increase transparency, ensuring responsible procurement by our suppliers and sub-suppliers, and to drive positive channels throughout the supply chain.

Wabtec suppliers of products that contain tantalum, tin, tungsten or gold which is necessary for production or functionality of the product will be expected to perform due diligence and provide the mineral source country and conflict status.

Wabtec reserves the right to conduct audits to ensure our supply chain remains compliant with the Dodd-Frank Wall Street Reform and Consumer Protection Act, Section 1502. If Wabtec identifies a reasonable risk that a supplier is violating our commitments set forth in this policy, we require them to commit to and implement a corrective action plan within a reasonable timeline and will conduct on-site assessments as necessary. Continued non-conformance and refusal to address issues of concern will lead to termination of the business relationship.