



GLOBAL

Ethics Code

SEPTEMBER 2023

Jim
Madison, Pennsylvania, USA



“ The time
is **always**
right to
do what is
right. ”

—MARTIN LUTHER KING, JR.

A Message from Patrick



The opportunity to work together at Westinghouse comes with the collective and individual responsibility to uphold our high standards and expectations for ethics, compliance and integrity. Every decision that we make—whether it is related to our employees, our customers, our suppliers or our communities—requires intentional action that aligns to our **Global Ethics Code**.

I am proud to introduce the annual update to our Code, which is our guide to keeping **Integrity at Our Core** and essential to maintaining our “license to operate” in our industry. Along with our regular companion training, exchanges with our Global Compliance Ambassadors, or other colleagues, our Code helps us all understand what is required as employees and the principles that we must follow. It also provides us with the guiding principles to implement ethical business practices in all the countries where we operate. The guidance outlined in the Code ensures we are fostering a strong ethical culture in all that we do.

Westinghouse has cemented our place within the nuclear industry through a commitment to integrity at all levels. Our Global Ethics and Concerns Helpline is core to ensuring accountability throughout our organization. As you all know, the helpline is available in full confidentiality and open to all employees, contractors, customers and stakeholders, without fear of any kind of retaliation.

Each day, we demonstrate that ethics, compliance and integrity are at the core of our decisions. This not only is critical to how we do business, but it is also, as individuals, the right thing to do. The actions of each of us are vital for upholding a culture of compliance that serves our communities, our customers, and our company.

Respectfully,

A handwritten signature in black ink, appearing to read 'Patrick Fragman', written in a cursive style.

Patrick Fragman
President and Chief Executive Officer



this is my
CODE

Jaime
Hopkins, SC

Contents

Integrity at Our Core



Workplace integrity entails more than simply following laws, the Westinghouse Global Ethics Code, and policies and procedures. Integrity requires a strong commitment to treating others with respect and dealing with those inside and outside of Westinghouse honestly and fairly.

Creating and maintaining a culture of integrity is fundamental to the future success of Westinghouse.

The power of Westinghouse, the power of **Integrity at Our Core**, comes from within each and every employee of this company.

It is our choice each and every day to do what is right.

This is our Code.

Westinghouse **VISION & VALUES**

together

we advance technology
& services to power a
clean, carbon-free future.

• Customer Focus & Innovation

• Speed & Passion to Win •

Teamwork & Accountability •

Safety • Quality • Integrity • Trust



Global Compliance Program

Westinghouse has an independent **Compliance Program** under the direction of the Vice President and Chief Compliance Officer. The Global Compliance organization consists of Ethics, Trade, Data Privacy, Nuclear Safeguards, and Data Management programs built to promote ethical decision making and prevent and detect unethical behavior.

- The **Ethics and Compliance Program** ensures adherence to laws and regulations related to anti-trust, anti-bribery and corruption, whistleblowing statutes, and is broken into several different subject areas: Gifts and Hospitalities, Charitable Contributions, Intermediaries, Political Donations, Reporting and Internal Investigations, Conflicts of Interest, Joint Ventures Compliance Program, and a Global Ambassadors Network.
- The **Trade Compliance Program** ensures adherence to laws and regulations controlling the export and import of goods, software and technology across all borders and is broken into several different subject areas: export controls, import compliance, embargoes and sanctions, and anti-boycott laws and regulations.
- The **Global Nuclear Safeguards Program** ensures compliance with IAEA and country-specific nuclear material and activity requirements.
- The **Data Privacy Program** ensures adherence to laws and regulations governing the protection and processing of personal data.
- The **Data Management Program** enhances collaboration and enables compliance through monitoring and applying necessary restrictions to controlled data flows by creating a global data taxonomy and digitally classifying documents, data and people.

While having a strong Compliance Program is important for our success, compliance is the responsibility of every Westinghouse employee. The Global Compliance organization collaborates with the Business Units and Global Functions including Human Resources, Finance, Internal Audit, Global Supply Chain, Global Employee Concerns Program, Security and others to maintain an effective compliance program. Our Global Compliance Ambassadors Network is designed to help answer Ethics and Compliance, Trade, and Data Privacy related questions in your organizations. This Global Ethics Code is a key element of our Global Compliance Program and sets the written standards of ethical behavior for all Westinghouse employees, contractors and business partners.

Global Compliance Program

- Ongoing compliance risk assessment of new laws and regulatory guidance
- Commitment to doing business legally and ethically
- Confidential process to raise, investigate and address concerns
- Guidance on ethics, data privacy, trade, nuclear safeguards, and other compliance issues
- Required risk-based compliance training
- ZERO tolerance for retaliation when raising concerns



Your Help Chain

Questions or concerns related to ethics and compliance should be addressed through the Westinghouse Help Chain by contacting any one of the following:

- Your manager or any member of the management team
- Human Resources by requesting support through the PowerHUB HR Help Center
- Global Compliance organization at ethicsandcompliance@westinghouse.com
- Confidential Global Ethics and Concerns Helpline
- Confidential Global Ethics and Concerns online reporting site at www.weccconcerns.com
- Employee Concerns Program (ECP)
- Legal
- Internal Audit
- Global Compliance Ambassadors



“ Integrity is
doing the
right thing
when you
don't have to
— when no
one else is
looking or will
ever know... ”

—CHARLES MARSHALL

My Code

Why do we have a Global Ethics Code?

Our Global Ethics Code is a guide to everyday work decision making and is built on our corporate values along with a simple commitment: always conduct business with **Integrity at Our Core**. If you observe wrongdoing or ethical misconduct, these are violations of our Code and you have a responsibility to report them through the Westinghouse Help Chain. Everyone who is assigned required training on the Code or related compliance topics must complete the training in a timely manner.

When do I need to use the Code?

- To gain understanding of the key risk areas in ethics and compliance
- As a resource when faced with an ethical dilemma
- To find information about the Westinghouse Help Chain

Who does the Code apply to?

Our Code applies to every employee of Westinghouse, its wholly-owned or controlled affiliates, subsidiaries, and joint ventures. The Code also applies to our officers and the Board of Directors. We expect contractors, consultants, agents, suppliers, and other business partners working with or on behalf of Westinghouse to comply with our Code.

All acquisitions adopt Westinghouse's Global Ethics Code and are timely and orderly integrated into existing compliance program structures and internal controls.

Code waivers

Any waiver of this Code must be approved by the Vice President and Chief Compliance Officer, Executive Vice President and Chief Legal Officer, and the Audit Committee Chair of the Board of Directors.

Upholding our Code

Compliance with our Global Ethics Code is mandatory for all employees. We must follow all relevant laws, regulations, and government policies. Our ethical obligations require that we maintain a questioning attitude as is inherent in the nuclear safety culture.

Importantly, each of us **must report all violations** of the Code using the Help Chain. These include, but are not limited to, violations of law, anti-trust issues, bribery, financial fraud, falsification of records, harassment, breaches of personal data, or trade compliance issues.

We must all adhere to the law, the Global Ethics Code, and policies and procedures. Violations of these governing principles can have serious consequences, including disciplinary action up to and including termination of employment to the extent permitted by law, as well as possible civil or criminal penalties.

Employee Responsibilities

- Understand and uphold the Global Ethics Code
- Demonstrate commitment to Westinghouse values and culture by doing business with the highest integrity
- Know and follow relevant laws and regulations
- Speak up—report all violations of the Code using the Help Chain
- Cooperate and be truthful during internal investigations

Leader Responsibilities

All of the employee responsibilities, plus:

- Ensure your employees follow the Westinghouse Global Ethics Code
- Ensure those who report to you receive the training and information necessary to perform their work in accordance with our Code
- Encourage open communication, feedback, and discussions
- Be available for employees to ask questions and raise concerns
- Recognize and reward ethical behaviors
- Take all concerns seriously and follow-up promptly



Make the Right Choice

Making the right choice is part of working at Westinghouse. Our Code does not address every possible law we must follow or every ethical situation we may encounter, but it sets expectations of ethical conduct globally for all employees and provides the framework for making ethical decisions. Use the questions below to guide you in making the right choice.

If you are not sure or answer “no” to any of the questions below, seek guidance immediately through the Westinghouse Help Chain:

- Your manager or any member of the management team
- Human Resources by requesting support through the PowerHUB HR Help Center
- Global Compliance organization at ethicsandcompliance@westinghouse.com
- Confidential Global Ethics and Concerns Helpline
- Confidential Global Ethics and Concerns online reporting site at www.wecconcerns.com
- Employee Concerns Program (ECP)
- Legal
- Internal Audit
- Global Compliance Ambassadors

Q If I observe a violation of our Code, do I have to call the Ethics and Concerns Helpline or can I discuss the issue with my supervisor and/or Human Resources?

A The Ethics and Concerns Helpline is just one of several avenues available to you to ask questions and raise concerns. Discuss the issue with your supervisor or Human Resources, but if you do not feel comfortable doing so, escalate your concerns through another avenue in the Westinghouse Help Chain – contact other members of management, Global Compliance organization, Legal, Internal Audit, Global Employee Concerns Program, or your Compliance Ambassador. If your concerns are still unresolved call the Global Ethics and Concerns Helpline.

Am I Making the Right Choice?



If the answer is **YES** to all of these questions you can move forward.



If the answer is **NO** to any of these questions, the action is likely inappropriate and you should not move forward without seeking additional guidance through the Help Chain.

Respect Others

Diversity, Nondiscrimination, and Equal Employment Opportunities

We comply with all applicable laws and regulations concerning equal opportunity and nondiscrimination. We do not tolerate any form of discrimination. Embracing diversity is the right thing to do. Building a diverse workforce will give us a competitive advantage, enable us to make more informed business decisions, and help us better service our diverse global customer base.

Commitment to Nondiscrimination and a Harassment-Free Work Environment

We strive to provide a work environment free from discrimination, offensive behavior and harassment of any type and for any reason. We conduct our operations consistent with the spirit and intent of the United Nations Universal Declaration of Human Rights and other applicable international initiatives.

We will not tolerate inappropriate behavior, including:

- Hostile, offensive, or humiliating behavior
- Unwanted physical contact
- Sexual harassment
- Harassment or discrimination based on religious or political beliefs or lack thereof
- Harassment or discrimination based on age, color, race, ethnic origin, sex, gender identity/expression, sexual orientation, disability status, genetic information; protected veteran status, citizenship status, or any other characteristics including those protected by law
- Retaliation for participation in any protected activity

We strive to create an environment where we encourage differences of opinion, free from fear of discrimination or retaliation, where all employees can openly ask questions or raise concerns.



For more information, refer to [BMS-LGL-5 — Nondiscrimination and Anti-Harassment Policy](#); [BMS-LGL-6 — Equal Employment Opportunity](#).

Q I am working on a company assignment in a country where certain ethnic groups are not protected by local labor laws from discrimination and unfair treatment. What does this mean in terms of how we treat employees in this country?

A Westinghouse will not tolerate discrimination or harassment of any kind in the workplace, regardless of whether country-specific laws do not provide local legal protection for certain ethnic groups. All employees must be treated fairly and with respect.



Honor our Customers and Suppliers

Our customers and suppliers are integral to achieving Westinghouse's vision as the global nuclear energy industry's first choice for safe, cost-effective, and secure solutions. We must treat our customers and suppliers ethically, respectfully, and fairly while delivering what we promise.

Customers

Our customer agreements should always be in writing and conform to our policies and applicable laws. When dealing with our customers, we always:

- Earn their business based on our superior products, customer service, and competitive prices
- Present our services and products in an honest and forthright manner
- Consistently deliver on our commitments while ensuring a strong nuclear safety culture
- Avoid unfair or deceptive trade practices
- Focus on high quality customer service
- Follow customer site requirements, policies, and procedures



Hopkins, South Carolina, USA



For more information, refer to [Westinghouse Supplier Code of Conduct](#) and local in-country policies.

Q I am overseeing the bidding process for a new contract. I thought that a vendor we were considering in South Korea was going to be awarded the contract as their proposal met all commercial and technical requirements and came in at the lowest price. My supervisor asked me to select an alternative vendor even though their proposal was more expensive and did not meet all commercial or technical criteria.

A Your responsibility is to seek the best value proposition for Westinghouse. In this case, you may wish to ask your supervisor why he/she is asking you to select another vendor. If you are uncomfortable discussing the situation with your supervisor, you may use another avenue in the Westinghouse Help Chain to raise your concerns.

Suppliers

We hold our suppliers to the same standards of integrity to which we hold ourselves and which our customers require. All suppliers must comply with our Westinghouse **Supplier Code of Conduct** and applicable customer site requirements, policies, and procedures.

We treat suppliers how we would want to be treated. When interacting with suppliers, we should always:

- Seek the best value proposition for the company
- Ensure all relationships with suppliers are free from conflicts of interest
- Keep supplier pricing confidential
- Report situations where suppliers are not compliant with the standards required by our customers.

We do not do business with suppliers that violate our standards, provide unsafe products or services, or are otherwise not compliant with the law. This includes ensuring compliance with country-specific laws on human rights and anti-slavery, such as the UK Modern Slavery Act and global initiatives such as the United Nations Convention on Human Rights.



this is my
CODE

Elizabeth
Churchill, PA

Avoid Bribery and Corruption

Westinghouse has a ZERO tolerance policy for engaging in any form of bribery or corruption, especially with public officials. This is crucial when maintaining adequate relationships with our colleagues, clients, and others we do business with. You must never offer, pay, request, or accept a bribe — including facilitating payments on behalf of or directly through third parties. The perception of corruption or bribery alone can be very damaging to our organization's reputation. Bribery and corruption take many forms and can be disguised through illicit business practices to gain or retain a business advantage. We compete fairly for our business opportunities. The paragraphs below contain information on the basic forms of bribery and corruption. It is important that you understand and follow the Westinghouse anti-corruption policies as well as appropriate regulatory requirements and laws when conducting business in countries around the globe. Some of the most prominent laws are the US Foreign Corrupt Practices Act (FCPA), the UK Bribery Act of 2010, as well as other international anti-corruption laws such as the OECD Convention on Combating Corruption of Foreign Public Officials, among others. Westinghouse's policies and procedures ensure compliance with all of these laws.

Employees must promptly and proactively report known or suspected bribery and corruption to our Global Compliance organization. Westinghouse prohibits retaliation against anyone who raises an allegation. Violations of our Global Ethics Code and policies, including the Westinghouse anti-corruption policy and respective laws, can have serious consequences, including disciplinary action up to and including termination of employment to the extent permitted by law, as well as possible civil or criminal penalties. If you need help understanding how to comply with these laws or would like to report suspicious activity, please contact Westinghouse's Global Compliance Organization.

We must uphold the highest ethical standards while continuing to protect our brand and reputation, and we expect our business partners to share in our principles. We will not engage in doing business with third parties who do not maintain effective anti-corruption compliance policies and procedures. We will continue to ensure that our business partners follow our organization's anti-corruption policy and procedures.

Intermediaries: Both direct and indirect bribery is prohibited. Indirect bribery is bribery committed on Westinghouse's behalf by a business partner, often referred to as an intermediary or other type of partner. This is any third party who represents Westinghouse, acts on its behalf, or acts jointly with Westinghouse for the purpose of obtaining, retaining, or directing business, or assisting with the other regulatory requirements, such as clearing customs or obtaining permits for Westinghouse. A more comprehensive list of these types of business partners is included in Global Intermediary Procedure (BMS-LGL-66). All new intermediary relationships require approval by Westinghouse Legal and the Global Compliance organization.

Facilitating Payments: Westinghouse prohibits facilitating payments or grease payments. These are small payments made to public officials to encourage them to perform actions they are already required to perform more quickly. If you are ever requested to pay something other than a publicly listed fee for service, contact Legal and Global Compliance before making the payment.

Employment: An offer of employment to a public official, an immediate family member thereof, or a similar individual who may have the ability to improperly favor Westinghouse, may be viewed as a bribe. For this reason, prior to hiring or engaging public officials, their immediate family members, or individuals with known close relationships with public officials, prior approval from the Legal and the Global Compliance organization is required.



For more information, refer to our [BMS-LGL-11 – Anti-Bribery and Corruption Policy](#), [BMS-LGL-66 – Global Intermediary Procedure](#), and [BMS-LGL-100 – Global Policy on Mergers and Acquisitions](#)

For more information on the warning signs of bribery, see the document titled “Bribery Red Flags” on george.

Q A manager working for our customer wants to tour one of our facilities in France. They are paying for their flights and hotel accommodation but asked if we could provide administrative support to help arrange the trip and provide transportation locally. Can Westinghouse support the trip and also host hospitality, such as meals and some entertainment while they are on-site?

A You can support the visits of customers, but only if fully approved in advance by the Legal and Global Compliance organizations. It is permissible to promote and demonstrate our products and technology to customers in compliance with our corporate policies, applicable laws, and government, customer, or supplier policies. You should contact Legal and Global Compliance with any questions regarding these types of travel arrangements for guidance in advance.

Prevent Money Laundering

We comply with money laundering laws everywhere we do business. We ensure our operations are conducted in a way that our employees, facilities, products, and services are used only for legitimate purposes and in compliance with Westinghouse policies and procedures, and all anti-money laundering laws, rules, and regulations.

We also ensure that we are not complicit in the money laundering schemes of other parties. To prevent money laundering, we should be alert to money laundering red flags when interacting with customers and other business partners.

Some money laundering red flags include:

- Orders or purchases that are unusual given the customer's line of work
- Untraceable payments to or from unknown accounts
- Requests for additional payments to unnamed third parties
- Novel deal structures designed to avoid taxes
- Requests to pay in cash or discount offers for paying in cash
- Requests for cash refunds

What is a bribe?

A bribe is offering, giving, or promising to give anything of value with the intent to improperly influence business decisions or create or obtain an unfair business advantage. Given the circumstances, intent may be implied, even if not expressed. Bribes may be:

- Cash, cash equivalents (such as gift cards), and/or loans
- Lavish gifts, hospitality, travel, and entertainment
- Discounts for products and services
- Offers of employment outside the normal hiring process
- Other favors, either business-related or personal
- Agreements with public officials that are outside the normal course of business
- Charitable or political contributions outside of the organization's guidelines
- Anything of personal value to the recipient



Fair Competition

We welcome open, transparent, and fair competition. Westinghouse is successful because of the quality of our products and services, not due to unfair or illegal practices. Anti-competition laws can be very complex, and failure to follow them can lead to serious consequences for individuals and Westinghouse. Westinghouse is committed to observing the applicable antitrust or competition laws of all countries in which it operates. Violations of antitrust or competition laws may result in severe penalties, including large fines and jail terms. Compliance with these laws is required at all times

Competitors

Anti-competition laws require every company to act independently when making decisions on competitively sensitive factors, such as price, market, and contract terms. It is a violation of anti-competition law to:

- Fix or control prices, either by agreeing directly with a competitor, or by any other method
- Structure bids to direct a contract to a certain competitor or reseller (bid rigging)
- Boycott certain customers or suppliers
- Share information with competitors about prices, costs, or profit margins
- Divide or allocate markets, territories, or customers
- Limit the production or sale of products
- Exchange or share unpublished information with a competitor
- Agree to reciprocal deals with partners or suppliers

Competitors May Also be Suppliers, Customers, and Partners

In the energy industry, it is not uncommon for a competitor to be a partner, or customer, depending, on the circumstances. We must be careful to not intentionally or accidentally share or discuss information that could lead to unfair competition or share information that would compromise our confidential business or proprietary information. Contact the Westinghouse Legal and Compliance organization if you have any questions regarding competition.



For more information, refer to our [BMS-LGL-34 – Anti-Competition Policy](#) and local in-country policies.

Q I was on a sales call with a customer. When discussing pricing, the customer mentioned that they were bidding on a project that Westinghouse may be interested in. The customer promised a lower price if Westinghouse promises to forego submitting a bid on the project. What the customer doesn't know is that Westinghouse already considered the project and did not plan to bid anyhow. Should I make the promise, knowing that it will get us a lower price and not actually affect our behavior?

A No, you should not make the promise. Collusive bidding violates our Code and could also violate anti-trust laws. It does not matter that Westinghouse did not plan to bid, as agreements to collude on bidding are per se anti-trust violations, regardless of the real-world effect on competition. You should say you feel the conversation is not appropriate and contact Westinghouse Legal or Global Compliance as soon as possible.

Q Last month I attended a nuclear professionals sales conference in Switzerland. I was having a discussion with a fellow sales representative from a Korean nuclear technology vendor. She told me they are having a hard time selling certain products in the American market and asked me about our price point on similar WEC-branded products. I told her I was not at liberty to discuss pricing. I was not sure if I should report this to legal. I thought there may be an anti-trust issue, but since the interaction occurred abroad and I was speaking with a foreign national I was unsure if US anti-trust law would apply. Should I report the issue?

A Yes, you should report conversation to Legal or Global Compliance. WEC policy prohibits the disclosure of pricing, cost, and profit-margin information with competitors. Furthermore, US antitrust law would apply even though the conversation occurred outside its borders and with a foreign national. US antitrust law applies any time anti-competitive conduct affects the US market. So even though the anti-competitive conduct occurred in Switzerland during a conversation with a Korean national, US anti-competition law would still apply, and you should report the issue to Legal and Compliance as soon as possible.

Participate in the Political Process in Compliance with all Regulations

Contacts with Government Representatives

Employees are encouraged to support the political process through personal contributions or by volunteering their personal time to the candidates or organizations of their choice. The following rules should be observed:

- If you participate in the political process, you must do so as a private citizen, not as a representative of the Company unless authorized.
- You may not work on a political fundraiser or pursue other campaign activities while at work or use the Company property or resources for political purposes.
- No Westinghouse employee may require you to contribute to, support or oppose any political group or candidate.
- If you need help understanding how to comply with this policy or would like to report suspicious activity, please contact Westinghouse's Global Compliance Organization.
- Any violation of this policy should be reported through the Westinghouse Help Chain.

In the event you are solicited for or intend to make a political donation to a foreign candidate or campaign, you must consult and comply with the Global Procedure on Political Contributions.

Additionally, Company employees must promptly consult with the Westinghouse Government and International Affairs office on issues involving the U.S. Government. Accordingly, employees who intend to meet with government representatives when on Company business, whether in the U.S. or abroad (i.e. U.S. embassy representatives abroad), shall notify the Government and International Affairs Office prior to such a meeting.

Ensure Appropriateness of Charitable Contributions

Employees are encouraged to be active in their communities, including by making charitable contributions at their own personal choice and by volunteering their time. These activities should generally be conducted outside of work, using your own time and resources and through your personal email, unless you are supporting specific Westinghouse-sponsored charitable programs.

Any charitable contributions, or contributions to similar not-for-profit organizations on behalf of the company require prior approval. If you receive a request for a charitable contribution or intend to make a charitable contribution on behalf of the Company, please refer the Global Procedure on Charitable Donations and Volunteerism to obtain appropriate approvals. In some instances, charitable contributions may present a potential risk of corruption, particularly in certain countries.

Q Recently my manager told the team that we need to vote for a specific candidate in a local election because “it’s in the best interests of the company”. Is this allowed?

A No. Westinghouse employees cannot require other employees to vote for or support a political party or candidate. You should contact Legal and Compliance about the incident.

Q My local veteran’s organization is organizing a Memorial Day walk. It would be great if Westinghouse sponsored a group of employees to participate. How should I go about organizing this?

A You should obtain the approvals prescribed in the Global Procedure on Charitable Donations and Volunteerism. Going through the adequate procedures ensures that Westinghouse is able to actively engage in charitable activities without exposing the company to unexpected legal or reputational risks.



For more information, refer to **BMS-COM-5 — Global Procedure on Charitable Donations and Volunteerism** and **BMS-LGL-101 — Global Procedure on Political Contributions**.

Act Responsibly when Giving or Receiving Gifts, Hospitalities, and Travel

Providing or accepting modest gifts, hospitalities, and travel is part of doing business globally. It can also create a positive work atmosphere between our organization, employees, and our business partners. However, if done lavishly, it can create the appearance that business decisions are made unfairly and could be viewed as bribery. If you are giving or receiving gifts, hospitalities, or travel, it is your responsibility to ensure that you comply with the Westinghouse Global Policy on Gifts, Hospitality and Travel, relevant country-specific laws, and obtain any required pre-approvals. This protects Westinghouse and you by ensuring that the gifts, hospitalities, and travel are permissible under applicable laws. It is also important to remain aware of cultural differences and business practices which vary substantially across different cultures, traditions, and norms.

Due to the varying perceptions of gifts around the world, Westinghouse maintains strict limitations on what types of gifts are acceptable to give and receive. Review the BMS-LGL-22 Global Policy on Gifts, Hospitality, and Travel before giving or receiving a receiving any gifts. **Cash or cash equivalents (such as gift cards) are never permitted.**

If accepting a gift or hospitality does not feel right, refuse it and consult with your manager or the Global Compliance organization about the situation before accepting or giving a gift. If you need help understanding how to comply with this policy or would like to report suspicious activity, please contact Westinghouse's Global Compliance Organization.

Permissible hospitality, which includes meals and entertainment include activities that are:

- Legal under the laws of the country in which it is provided
- Permissible under Westinghouse policy
- Permissible under the internal policies of the recipient
- Reasonable and modest in value within your region
- Not designed to influence judgment or be perceived as a favor to retain services
- Not conducted with a public official
- Not imposing a sense of obligation on the recipient
- Reported or approved in accordance with Westinghouse policy



For more information, refer to [BMS-LGL-22 – Global Policy on Gifts, Hospitality and Travel](#).

Q A supplier offered me a gift card to a local steakhouse. Can I accept?

A No. Westinghouse employees are not permitted to accept cash or cash equivalents. If the supplier offers to pay for a meal and no cash is exchanged, so long as it is not extravagant, it is likely permissible. You should check with Global Compliance before accepting the meal in-kind.

Q One of our suppliers invited us to a golf outing. The supplier offered to pay all expenses for travel, meals, and lodging. Can I accept the offer?

A Maybe, but you need to consult Legal and Global Compliance first. All such travel requires pre-approval by the Compliance organization. Compliance would need to examine the value of the goods and services provided to determine the risk of accepting the trip.

Q Recently at a trade show I won a raffle for two baseball tickets. Can I accept these?

A Yes. You may keep items obtained at a trade show or other business-related gathering so long as they were awarded through a process in which they were generally available and not targeted at any one individual.

Act in the Best Interest of the Company

Conflicts of interest occur when an employee's outside activities, personal financial interests, or other personal interests influence or appear to influence decisions that affect Westinghouse.

We should always act in the best interest of Westinghouse. This means:

- Avoid actions that create a conflict of interest or even the appearance of a conflict of interest; and
- Comply with the Personal Conflicts of Interest Policy.

All employees should disclose actual or potential conflicts of interest to their manager, a Human Resources Business Partner or Global Compliance at coi@westinghouse.com.

Conflict of Interest

Having a conflict of interest is not always a violation of our Code, but **failure to disclose** actual or potential conflicts of interest does violate the Code. Below are some examples of conflicts of interest:

- Doing business with close friends or family members
- Taking a second job that competes with Westinghouse
- Managing your own business such that it interferes with your Westinghouse role
- Working for close friends or family members, or having them work for you
- Having direct or indirect significant financial interest in one of our competitors, suppliers, customers, or other third parties with whom we do business
- Diverting a business opportunity from Westinghouse to another company; and
- Serving on the Board of Directors of certain for-profit businesses



For more information, refer to [BMS-LGL-24](#) — [Personal Conflicts of Interest Policy](#) and local in-country policies.



this is **our** code

Westinghouse Women in Nuclear Group
Lori, Alicia, Amy, Alyssa, Ashley, Laura, Chelsea, Kelly, Sydney, Jennifer Lindsey, Leah, Seirra, Rachel, Julie, Stefanie, Sylena
Cranberry Township, Pennsylvania, USA

Q Can I do work for a Westinghouse customer on my own time? I just want to save the customer money and the customer would receive the same quality of service as if Westinghouse provided the service.

A No. This is a direct conflict of interest. You are using your knowledge of a Westinghouse customer and that customer's needs to create extra income for yourself. You may also be directly competing against the Company by taking a potential Westinghouse business opportunity.

Q I was asked to be on a for-profit Board of Directors of an outside organization. Is it a conflict?

A Although this would not always constitute a conflict, employees should be careful about the circumstances. Conflicts of interest are more likely when the outside organization is a competitor, supplier, or customer, or has some other existing relationship with Westinghouse. In all cases, you must discuss potential service on any not-for-profit or for-profit Board with the Global Compliance organization before accepting a directorship.

Trade Lawfully

The Trade Compliance Program at Westinghouse ensures adherence to laws and regulations controlling the export and import of goods, software, and technology across all borders. Our employees must comply with the Global Trade Compliance Company Directive and regional and local policies and laws in countries where we do business. Trade Compliance can be broken into several different subject areas, as follows:

Export Controls

Employees are required to comply with export control laws in all countries in which we do business. As US export control laws continue to apply to exported US goods and technology, all Westinghouse sites globally must comply with both local and applicable US export regulations.

Import Compliance

Westinghouse complies with import laws in all countries in which we do business, including classification and marking requirements. Preferential duty programs are utilized to maximize cost savings for our business and our customers.

Embargoes and Sanctions

At any time, a region or country may decide to restrict trade with certain countries, entities, or individuals. The penalties for violating these restrictions can be very serious. Westinghouse complies with all legally mandated embargoes and sanctions.

Anti-Boycott Laws and Regulations

Westinghouse and its non-US subsidiaries, offices, and affiliates shall not participate in any economic boycott that is contrary to US anti-boycott laws. Westinghouse reports any such requests to the US government, as required by law.

Report Non-Compliant Transactions

Contact Global Trade Compliance to seek guidance or report non-compliant trade practices such as:

- There is an actual or potential inadvertent release or misuse of Westinghouse technology.
- The customer or purchasing agent is reluctant to offer information about the end-user.
- A freight forwarder is listed as the end-user.
- Stated end-use is inconsistent with product specifications.
- The transaction involves cash or cash equivalents.



For more information, refer to [BMS-LGL-73—Global Trade Compliance Company Directive](#), and regional and local in-country policies.

Q I am negotiating a contract with a customer from a Middle Eastern country and was asked to supply information about Westinghouse's associations with Israel. Can I comply with this request?

A This is a potential problem, and depending on other facts, it may be illegal for the Company to supply such information due to US anti-boycott laws. You should check with the Global Trade Compliance group before proceeding.

Q I am an Engineering Manager in the US working on a steam generator replacement project and need to utilize Westinghouse engineers in multiple countries to be able to deliver on time for our customer. I know I can share nuclear technology without specific export licenses to Canada and our locations in EMEA. Can engineers in those countries share nuclear technology with each other and back to the US without specific export licenses?

A All locations outside of the US require specific export licenses to transfer nuclear technology. While many specific export licenses already exist, they may be scoped for specific projects. Situations like this must be reviewed on a case-by-case basis by the Global Trade Compliance Team.

Q I am a sourcing manager in France and have identified a potential supplier that has a US sanctioned party as their beneficial owner. The beneficial owner is sanctioned by the US, but not by France. As there will be no US involvement in this transaction, do I have to worry about US sanctions?

A Yes. All Westinghouse locations globally must comply with US sanctions requirements, in addition to local export laws. Contact the Global Trade Compliance group for guidance as needed.

Q I have been contacted by a defense contractor that wants to use some of Westinghouse's nuclear technology for military purposes. Are there any special precautions I need to take when engaging with a defense contractor, even when they're just talking about nuclear technology?

A Yes, there are special precautions you must take when engaging with a defense contractor. The first step is engaging the Global Trade Compliance Team before proceeding. When we begin to modify any of our regular work for military end use, we are stepping into more restrictive trade regulations that require additional measures.





this is my
CODE

Jennifer
Cranberry Township,
Pennsylvania, USA

Be Accurate and Transparent

We have ZERO tolerance to any type of fraud. We must be accurate and transparent in the way we conduct business and record business transactions at Westinghouse. We must also apply the highest ethical standards in our financial and non-financial reporting.

This means:

- Ensuring all financial transactions are properly authorized
- Meeting all accounting, financial, tax and other relevant regulatory requirements, including adherence to Sarbanes-Oxley, in countries where we operate
- Ensuring accurate and transparent financial reporting
- Ensuring accurate reporting on project actual status, actual costs, and up-to-date schedules
- Ensuring Estimated Costs to Complete reflect the most current (known) conditions
- Ensuring project schedules include the complete scope remaining in the project (inclusive of vendor/supplier information) and reflect the achievable activity durations
- Completing accurate product quality inspection and testing logs
- Transparently reporting on environmental, quality, and safety
- Ensuring all outside presentations and responses to inquiries about Westinghouse are complete, fair, accurate, timely, and understandable

We must **not**:

- Misrepresent or falsify financial accounts, records, or reports
- Maintain off-the-book accounts to facilitate questionable or illegal payments
- Falsify non-financial records, such as product quality testing results
- Evade taxes or facilitate tax evasion by other parties
- Manipulate, coerce, or mislead employees, auditors, and business partners for the purpose of making misleading entries in our financial statements

If you believe you are being asked to use questionable accounting techniques, falsify information, or make any inaccurate entries in our books and records, or if you are aware that others are doing so, you should immediately escalate your concern through the Westinghouse Help Chain.



For more information, refer to [BMS-FIN-12 – Financial Policy Governance – Appendix A: Global Financial Policies](#) and local in-country policies.

Q I have seen instances in which project status reporting of cost and schedule do not seem to accurately reflect the actual performance on the project. What should I do?

A If you are comfortable doing so, discuss the situation with your supervisor. You can also speak with a higher-level manager in your organization or use another Help Chain avenue if your concerns are not addressed. If inaccurate reporting of project financials took place, it is a serious violation of our Code and even possible violations should always be reported and addressed.



Maintain Confidentiality, Protect Proprietary Information, Intellectual Property and Personal Data

Confidentiality

Information is among our most important assets. We are all responsible to protect the confidentiality of Westinghouse's information. Confidential Westinghouse information includes:

- Proprietary and confidential technical information
- Accounting and financial information
- Business and strategic development plans
- Customer and supplier information
- Information about upcoming acquisitions
- Personal data

Proprietary Information

Proprietary information includes information, data, software, drawings, designs, specifications, hardware, matter or thing of a secret, proprietary, confidential or private nature identified as confidential, proprietary or the like, relating to the business of Westinghouse, including matters of a technical nature (such as know-how, processes, data and techniques), matters of a business nature (such as information about schedules, costs, profits, markets, sales, customers, contractual dealings with each other), matters of a proprietary nature (such as information about patents, patent applications, copyrights, trade secrets and trademarks), other information of a similar nature, and any other information that has been derived from the foregoing information. Proprietary information may be treated as secret and confidential (e.g., Westinghouse Proprietary Class 1, Westinghouse Proprietary Class 2) or may not be confidential (e.g. Westinghouse Non-Proprietary Class 3), to preserve our competitive advantage and operational security.



For more information, refer to [BMS-LGL-28 – Westinghouse Proprietary Information](#); [BMS-LGL-32 – Marking and Handling Proprietary Information](#); [BMS-LGL-36 – Computer Software Intellectual Property Management](#); and local in-country policies.

Public and Media Inquiries

Any request received by employees for interviews or Westinghouse information from an outside organization will be referred to Global Communications. Westinghouse employees are not authorized to interact with media on the company's behalf, including through social media. All inquiries should be directed to the team at Media@Westinghouse.com.

How to protect confidential business information

- Emails containing confidential business information must be handled in accordance with applicable policies.
- Minimize confidential data stored locally on your laptop, password protect it, and always lock your screen when you are away.
- A paperless approach should be adopted wherever possible — only print confidential business information when you need to, and do not leave any printed documents in plain view or at printers.
- Confidential information should be locked away if required to be retained, shredded or disposed of in a secured shredding bin if no longer needed.
- Documents and laptops with confidential information should only be taken off premises when necessary to fulfill your job duties and must be secured at all times.
- Share confidential information only to the extent necessary for a business purpose with prior legal approval.
- Exercise caution when discussing confidential information with Westinghouse colleagues outside the office.
- Continue to protect confidential information even after a business relationship or opportunity has been terminated.
- When unsure, contact Legal or Global Compliance with questions about confidential information.

When traveling outside your home country, submit a “Cross-Border Work Request” IT ticket or contact Global Trade Compliance about any laptop restrictions or to obtain a loaner laptop.



For more information see: [BMS-IS-46 – Westinghouse Global Information Security Policy](#); [HR-92 - Temporary Cross-Border Remote Work Policy](#).

Intellectual Property

Intellectual property is any know-how, knowledge, or knowledge artifact that promotes the competitiveness of Westinghouse. Intellectual Property includes Proprietary Information as defined above, and also includes information that although available to the public, is protected by law or statute, such as patents trademarks and copyrights.



For more information, refer to the [BMS-LGL-48 – Trademarks and Service Marks](#); [BMS-LGL-29 – Guidance on Copyrights](#), and local in-country policies. Visit the Intellectual Property Committee page on george for the latest Patent Invention Procedure.

Personal Data

Personal Data are information regarding individuals or that could enable the identification of individuals, including identification data, contact details, demographic information, but also online identifiers and factors about the physical, cultural, digital identity of the individual, etc.

Personal Data loss or misuse may result in harm to individuals, including embarrassment, inconvenience, and fraudulent data use. Protecting the confidentiality and integrity of Personal Data is a critical responsibility that Westinghouse takes seriously and expects employees to process Personal Data legally, fairly, and confidentially.

For more information on the principles and guideline that shall be followed when processing Personal Data refer to the Personal Data Protection and Privacy policy.



For more information, refer to [BMS-LGL-105 – Personal Data Protection and Privacy Policy](#)

Communications and Social Media

We must protect the confidentiality of business and Personal Data as we use social media and all other communication methods. When posting information, comply with all applicable Westinghouse policies and procedures. Post only honest, accurate, and appropriate content.

If you identify any potential misuse of social media, you should report it to Global Communications. Refer to the Westinghouse Social Media Policy to assist you in making responsible decisions about your use of social media.



For more information, refer to [BMS-COM-4 – Social Media Policy](#) and local in-country policies.

Q I am working on a presentation to be given at a conference in Sweden and it is not entirely clear what markings should be on documents and what I can and cannot share with those attending the public conference. How can I get help to ensure I am properly marking and protecting Westinghouse information?

A The answer can be complicated and so you are always right to seek guidance. You may also refer to [BMS-LGL-28, The Classification, Reclassification and Release of Westinghouse Proprietary Information](#), [BMS-LGL-32 Process for marking and Handling Proprietary Information](#), or seek guidance from our Proprietary Information Coordinator or through the Help Chain.

Q One of my colleagues asked me to send confidential information to her personal email address. She said doing so makes it easier to work on the project while at home. Should I honor her request?

A No. Proprietary information or any other company information should never be sent to a personal email address. You may send the information to her WEC email so long as you follow all applicable policies.

Q A supplier asked me about another supplier's bid on a recent contract. Since we already awarded the contract, can I share the other candidate's bid?

A No. Project bids are confidential information and remain so even after the contract has been awarded. Showing the supplier another company's bid could give the supplier an unfair business advantage and could be in violation of antitrust laws.

Westinghouse's Commitment to the Environment, Health and Safety

Our Environmental, Health and Safety Program

Westinghouse is committed to ethical corporate conduct in the areas of Environment, Health, and Safety (EHS). This commitment extends beyond the company, to the communities in which we operate, and is supported by a team of experienced and EHS professionals dedicated to fulfilling Westinghouse's ethical standard of Integrity at our Core. Westinghouse's commitment to EHS is present at all levels of the organization. From the shop floor to the corporate boardroom, we encourage all employees to speak up when any safety and environmental concerns arise. Employees can bring concerns to their managers, or to the Westinghouse Global Ethics and Concerns Helpline, available 24/7/365 in all countries in which we operate.

Our EHS Commitments

Westinghouse is Committed to:

- Complying with all applicable environmental, health and safety legislation and regulations, as well as company policies.
- Ensuring conformance with all applicable legal and other compliance obligations and requirements.
- Providing a safe and healthy work environment by preventing work-related accidents.
- Identifying EHS risks throughout the organization and implementing effective plans to eliminate or manage those risks.
- Reducing our environmental impact by minimizing greenhouse gas emissions, raw material and energy usage, and preventing pollution by reducing waste, recycling and reusing materials and resources.

- Recognizing the special circumstances of nuclear technology and ensuring that activities involving nuclear materials are performed in a manner that ensures that nuclear safety is not compromised by other priorities.
- Setting meaningful, realistic objectives to continually improve our EHS performance.
- Utilizing qualified and competent resources to implement and maintain our EHS program.
- Maintaining a work environment where employees are encouraged to openly express concerns about the quality and safety of our products and services.

Environmental Responsibility

At Westinghouse, we conduct business in a way that protects the environment and the public. As a nuclear energy company, we recognize our role in reducing carbon emissions and embrace the opportunity to help create a greener planet.

To protect the environment, Westinghouse is committed to:

- Reducing waste, preventing pollution, conserving resources, and using energy efficiently in all our operations
- Continually improving environmental management systems and performance by establishing and maintaining meaningful objectives and targets
- Training employees to work in an environmentally responsible manner
- Completing Environmental Impact Assessments as required by applicable law

Health

Westinghouse strives to protect both the physical and psychological health of its employees, customers, and neighbors. To support this, Westinghouse is committed to:

- Fostering a culture of respect for others
- Maintaining the highest standards of diligence in protecting the communities in which we operate
- Ensuring proper nuclear material control and accountability

Safety

Our ZERO incident goal applies to all aspects of safety, security, and quality — as well as ethics and integrity. Everyone must accept the responsibility for keeping themselves and their workplace safe. To support this, Westinghouse is committed to:



- Show respect for others
- Follow the rules
- Stop when unsure
- Promptly report problems
- My signature is my word

Security

We are committed to a secure and safe workplace supporting our world-wide business delivering safe, cost-effective, and secure solutions. Our focus is:

- A violence-free workplace
- Preventing loss or compromise of sensitive information or intellectual property, and company property and assets
- Providing crisis management and risk mitigation
- Providing travel and threat intelligence
- Restricting prohibited items from entry into the Westinghouse workplace
- A drug and alcohol-free workplace
- Proper nuclear material control and accountability
- Implementing and maintaining personnel access control
- Standardized security practices during M&A process



For more information, see [BMS-SEC](#) documents.

Safeguards Compliance

Westinghouse facilities comply with applicable national, regional, and international safeguards regulations. The Global Nuclear Safeguards program enhances collaboration between Westinghouse units that are responsible for adherence to national, regional, and international safeguards requirements and ensures the appropriate protection of safeguards information in Westinghouse systems. Westinghouse ensures early engagement with relevant safeguards equities to reduce risk to scope, schedule, budget, and licensing to comply with safeguards requirements globally.

Quality

Westinghouse fulfills quality requirements and meets customer expectations while focusing on continuous improvement and delivering excellence. Westinghouse designs, sources, produces, markets, and delivers products and services in a compliant and reliable manner. We strive to deliver our products and services with uncompromising first-time quality. Engagement from every employee, in their respective role, fosters a culture of quality through the company.



For more information, refer to [BMS-NSC-1—Maintaining a Positive Nuclear Safety Culture \(NSC\) and Safety Conscious Work Environment \(SCWE\)](#) and [BMS-ECP-1—Employee Concerns Program Procedure, POL-WEC-001 — GEHS Policy](#), and local in-country policies.

Q I am working at a customer site and their safety standards are different. I am concerned that this may put our employees at risk. What should I do?

A You must ensure the safety of yourself and those around you. If there is an immediate safety risk, you should stop work and notify the highest-level Westinghouse leader at the worksite so that he or she can further advise you and notify the customer. Working with the customer, your supervisor will coordinate with Westinghouse leadership, and Environment, Health, and Safety, and Nuclear Safety organizations to develop a solution that allows us to comply with Westinghouse policy while safely meeting customer needs.

An important part of a healthy nuclear safety culture (NSC) is a Safety-Conscious Work Environment (SCWE). SCWE is an environment in which personnel feel free to raise safety concerns without fear of retaliation, intimidation, harassment or discrimination, where concerns are promptly reviewed, given the proper priority based on their potential safety significance, and appropriately resolved with timely feedback.

In addition to ensuring a SCWE, we instill the following traits of a healthy NSC into all work activities:

1. Personal accountability
2. Questioning attitude
3. Effective safety communication
4. Leadership safety values and actions
5. Decision making
6. Respectful work environment
7. Continuous learning
8. Problem identification and resolution
9. Environment for raising concerns
10. Work processes

Concerns regarding nuclear safety or compliance with nuclear regulatory requirements may be raised directly with the Global Employee Concerns Program.

“ Relativity
applies to
physics, not
ethics. ”

—ALBERT EINSTEIN

Make a Difference

We make a difference both through the work we do for Westinghouse and in our personal lives outside of work.

Community

Westinghouse supports communities where we do business by making charitable contributions. The Westinghouse Charitable Giving Program enables us to provide financial support to communities in one or more of our strategic areas of giving: education, with a focus on science, technology, engineering, and mathematics; environmental sustainability; and community safety and vitality.

Sustainability

We strive to incorporate principles of sustainability into how we conduct business. At Westinghouse, this means creating value with fewer resources and minimizing negative impacts of our operations and technology. We seek to create sustainable business value through technology innovation, operational efficiency, stakeholder engagement, and personal accountability. To accomplish this, we seek to continually improve our environmental management systems and performance by establishing and maintaining meaningful objectives and targets. Westinghouse is also committed to complying with all applicable environmental laws and regulations. By focusing on sustainability, Westinghouse can better achieve its objective of producing low-emissions electricity, helping us work towards a carbon neutral world.

Protecting Human Rights

We conduct business consistent with the spirit and intent of the United Nations Universal Declaration of Human Rights and other applicable international initiatives. At Westinghouse, we embrace human rights initiatives. This means treating all employees, customers, suppliers, and business partners with dignity and respect. Westinghouse is also committed to conducting due diligence to identify and eliminate business relationships that support modern slavery, human trafficking, and the use of conflict minerals (gold, tin, tantalum, and tungsten sourced from the Democratic Republic of the Congo and the African Great Lakes Region). To support this effort, we have developed a Supplier Code of Conduct and include appropriate terms and conditions in our contracts.

Q I was reviewing bids on a supply contract for tin to be used in one of our facilities. All bidders were US-based suppliers, but one offer was substantially less than the others. I know tin is a conflict mineral, but the price is too good to pass up. Should I accept the offer?

A No, not yet at least. Given that tin is a conflict mineral, Westinghouse must ensure that it is responsibly sourced before we allow it to enter our business operation. A dramatic discrepancy in price could indicate that the tin was sourced from a conflict zone, where slave labor is often used for the extraction, greatly lowering cost. You should contact Legal and Compliance as soon as possible so that they can conduct due diligence on the supplier. Although this may just be a great deal, we must conduct appropriate due diligence to ensure we are honoring our commitment to support human rights.

Q On a plant audit, I noticed that some of the contractors looked rather young. I asked the plant manager about this, and he said, "oh yeah, it's not a big deal, that is customary here." When I asked him to provide their ages, he told me he never asked, since they are only contractors and not Westinghouse employees. I am worried Westinghouse may be unknowingly employing child labor, what should I do?

A You should contact Legal and Compliance as soon as possible. The use of child labor is itself a human-rights risk, but also carries with it the potential for modern slavery and human trafficking. Even if the use of child labor is customary and legal in a jurisdiction in which Westinghouse operates, it is still prohibited by Westinghouse due to its linkage to human rights violations.

Q An article in my local newspaper mentioned that one of Westinghouse's suppliers may be investigated for modern slavery. The story did not make national news and I work remotely away from any Westinghouse locations, so it is unlikely others at the company saw the article. This seems like a risk to the business, who should I contact?

A You should contact Legal and Compliance as soon as possible. Whenever you have concerns about any human rights issue within Westinghouse's supply chain, you should not hesitate to raise concerns. An open reporting culture is crucial to ensuring that we can detect and investigate human rights issues as they occur.

Live the Code – Seek Help and Speak Up

It is the responsibility of each and every one of us to live our Global Ethics Code.

This is Our Code.

At Westinghouse, we pride ourselves on our **Speak Up** culture and encourage the discussion of ethical implications. **Speak Up** culture means proactively reporting violations of law, our Global Ethics Code, and our policies and procedures through the Westinghouse Help Chain.

Speak up when you see wrongdoing or ethical misconduct.

Our managers and supervisors are an important resource for guidance or concerns related to many company and job-specific policies and processes, work responsibilities, co-worker issues, discipline disputes, promotion opportunities, and issues related to the work environment.

At Westinghouse there are multiple ways to raise concerns, including anonymously through the Westinghouse Ethics and Concerns Helpline.

Our ZERO tolerance policy for retaliation goes hand-in-hand with our belief that speaking up is always the right thing to do.

Report potential or suspected retaliation immediately.

Q What happens when I call the Global Ethics and Concerns Helpline?

A You can call either using your name or anonymously where allowed by law. All Helpline calls are answered by an independent third party. An Intake Specialist will collect information about your concerns and send a report to Westinghouse Global Ethics and Compliance personnel for a confidential review. Independent, qualified, objective investigators designated by the Global Compliance organization will investigate your concerns and will take appropriate action. The identity of the reporter will be protected.

Seek Help and Speak Up by Contacting the Help Chain



SPEAK UP When Our Code Is Not Followed

- Contact anyone in the Help Chain or file a phone/web report through the Global Ethics and Concerns Helpline
- When you contact the Helpline, the Global Compliance organization will receive your report and assign it for investigation
- Professional, objective, and confidential investigations will be conducted in accordance with local law
- You will receive updates throughout the investigation
- When the investigation is completed, as appropriate, the Global Compliance organization will share the outcome



For more information, refer to **BMS-LGL-92—Ethics and Concerns Reporting and Investigations Policy**.



HELPLINE

You can ask questions, report concerns, or report potential violations through the Global Ethics and Concerns Helpline phone numbers:

BELGIUM

Step 1: Dial 0-800-100-10

Step 2: at the prompt enter 8442384380

BRAZIL

0-800-000-2808

CANADA

1-844-238-4380

CHINA

400-120-8512

FRANCE

Step 1: Dial

Telecom — 0-800-99-0011

Paris Only — 0-800-99-0111

0-800-99-1011

0-800-99-1111

0-800-99-1211

Telecom Development — 0805-701-288

Step 2: at the prompt enter 8442384380

GERMANY

Step 1: Dial 0-800-225-5288

Step 2: at the prompt enter 8442384380

ITALY

Step 1: Dial 800-172-444

Step 2: at the prompt enter 8442384380

JAPAN

Step 1: Dial

NTT — 0034-811-001

KDDI — 00-539-111

Softbank Telecom — 00-663-5111

Step 2: at the prompt enter 844238438011

MEXICO

800-077-0794

POLAND

800-005-088

SOUTH KOREA

Step 1: Dial

Dacom — 00-309-11

ONSE — 00-369-11

Korea Telecom — 00-729-11

Step 2: at the prompt enter 8442384380

SPAIN

Step 1: Dial 900-99-0011

Step 2: at the prompt enter 8442384380

SWEDEN

Step 1: Dial 020-799-111

Step 2: at the prompt enter 8442384380

UKRAINE

Step 1: Dial 0-800-502-886

Step 2: at the prompt enter 8442384380

UNITED KINGDOM

Step 1: Dial 0-800-89-0011

Step 2: at the prompt enter 8442384380

UNITED STATES

1-844-238-4380

SUBMIT WEB REPORTS AT:

www.weccconcerns.com

ethicsandcompliance@westinghouse.com

Global Compliance Organization
Westinghouse Electric Company LLC
1000 Westinghouse Drive
Cranberry Township, PA 16066-5528



this is my
CODE

Ron
Newington, New Hampshire
USA



SCAN HERE TO
USE OUR MOBILE
REPORTING SITE



this is my
CODE

Danny
Hopkins, South Carolina,
USA

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Definitions

Anti-trust or competition laws: Laws that prohibit a variety of practices that restrain trade, such as price-fixing, corporate mergers likely to reduce the competitive vigor of particular markets, and predatory acts designed to achieve or maintain monopoly power.

Anything of value: Includes, but is not limited to, cash and cash equivalents, charitable donations, free merchandise, gifts, travel, meals, entertainment, use of corporate assets, and favors, such as educational and employment opportunities for friends and relatives, and loans.

Boycott: A refusal to engage in business with another party.

Bribe: An offer, request, promise, or authorization to pay, or receipt of anything of value (directly or indirectly) to or from any public official or any other person or entity, including those in the commercial sector, intended to induce the recipient to misuse his or her position to help obtain an improper business advantage.

Conflict Minerals: A mineral mined in an area of armed conflict and traded illicitly to finance the fighting.

Conflict of interest: A conflict of interest is a financial or other interest, direct or indirect, which may affect, or might reasonably be thought by others to affect, an employee's judgment or conduct in matters involving Westinghouse.

Corruption: The wrongful use of influence in a business dealing to procure a benefit for the actor or another person, contrary to the duty and/or the rights of others. Corruption occurs in various forms, including bribery, kickbacks, illegal gratuities, economic extortion, collusion, and conflicts of interest.

Discrimination: Discrimination is the treatment or consideration of, or making a distinction in favor of or against, a person based on the group, class, or category to which the person is perceived to belong rather than on individual attributes. Various types of discrimination include, but are not limited to, age, color, disability, race or ethnicity, religion, gender, and sexual orientation.

Embargo: An embargo is the partial or complete prohibition of commerce and trade with a particular country or a group of countries. Embargoes can mean limiting or banning export or import; creating quotas for quantity; imposing special tolls or taxes; banning freight or transport vehicles; freezing or seizing freights, assets, or bank accounts; or limiting the transport of particular technologies or products.

End-user: The entity that receives and ultimately uses the exported or re-exported items. The end-user is not an authorized agent or intermediary.

Export: Exports include: (a) physically or electronically sending a good or technology across an international boundary or providing a service to a recipient in another country; or (b) disclosure of information to a person of foreign nationality, which is deemed to be an export to that recipient's country regardless of his or her location. Deemed exports can be made by physical delivery, email, facsimile, plant tours, demonstrations, on-the-job or other technical training, briefings, teleconferences, provision of technical assistance, or computer access (remote, WAN/LAN) as user or IT administrator, regardless of location.

Export license/authorization: The authorization by an export agency authority to proceed with a regulated activity (e.g., export, re-export).

Facilitating payments: Small payments to public officials to encourage them to perform actions they are already required to perform, such as clearing goods through customs or issuing a permit.

Financial fraud: The deliberate misrepresentation of the financial condition of the Company through the intentional misstatement or omission of amounts or disclosures in the financial statements in order to deceive financial statement users. Financial statement fraud usually involves overstating assets, revenue, and profits and understating liabilities, expenses, and losses.

(Definitions, continued)

Foreign Corrupt Practices Act (FCPA): US law enacted in 1977, as amended, criminalizes the bribery of foreign officials anywhere in the world where the purpose of the bribe is to influence an official decision in order to obtain a business benefit.

Fraud: The use of one's occupation for personal enrichment through the deliberate misuse or misapplication of the Company's resources and assets. The three major types of fraud are: corruption, asset misappropriation, and financial statement fraud.

Gifts: A gift is something given voluntarily, without the expectation of anything in return. A gift could be considered to be a bribe if it is given or received with the intention of influencing someone to act improperly, or as a reward for having acted improperly.

Government/public official: Government is defined to include all levels and subdivisions of government (i.e., local, municipal, provincial, state, regional, or national, and the administrative, legislative, judicial, and executive branches); government-owned enterprises; and quasigovernmental organizations that are wholly or partially supported by government funds. Public official is any elected or appointed government official or employee at all levels of government (local, state, or national) or branch (legislative, executive, or judicial); anyone acting on behalf of a public official, agency, instrumentality, or enterprise that performs a government function; any employee or other person acting for or on behalf of any entity that is controlled by more than 50% by the government; any government-owned or controlled company; any political party, a political candidate, or anyone acting for or on behalf of a political party; any candidate for public office; or any employee or person acting for or on behalf of a public international organization.

Harassment: Harassment covers a wide range of offensive repetitive behaviors that appear to be disturbing or threatening. Sexual harassment includes persistent and unwanted sexual advances.

Import: An import is a good or technology brought into one country from another. When importing, all Company employees must comply with applicable laws and regulations, which address matters such as classification of goods, marking and labeling of goods, valuation of goods, payment of duties, data filing, and recordkeeping.

Intellectual property: Any and all rights in and arising out of patents and patent applications, industrial designs, trademarks, service marks, brands, logos, trade and business names, copyrights, works of authorship, trade secrets, know-how, inventions, improvements, technology, business and technical information, databases, data compilations, methods, processes and techniques, and all other intellectual or industrial property, and proprietary or other legally enforceable rights, whether registered or not, and any registration of such rights.

Intermediary: Any third party that represents the Company, acts on its behalf, or acts jointly with the Company for the purposes of obtaining, retaining, or directing business as well as distributing or reselling Company's products and/or services, including commissioned sales agents, distributors, sales representatives, consultants, lobbyists, transportation or logistics providers, customs clearing agents, brokers, joint venture partners, and any non-Company third parties operating under a power of attorney granted by the Company.

Kickback: A kickback is a form of corruption that involves two parties agreeing that a portion of sales or profits will be improperly given, rebated, or kicked back to the purchaser in exchange for making the deal.

Money laundering: Money laundering occurs when companies or individuals attempt to conceal or disguise the proceeds of unlawful activity by moving them in a manner that hides their source and makes them look legitimate.

(Definitions, continued)

Nuclear Safeguards: Safeguards are a set of technical measures applied by the International Atomic Energy Agency (IAEA) on nuclear material and activities, through which the Agency seeks to independently verify that nuclear facilities are not misused and nuclear material not diverted from peaceful uses.

Personal data: Information identifying or relating to an individual, that either identifies or can be combined with other data in our possession or readily accessible to identify (directly or indirectly) an individual. Personal Data includes, but is not limited to, name, email address and phone numbers (including personal and Company e-mail address and phone numbers), date of birth, any identification number, location data, an online identifier or one or more factors specific to the physical, physiological, genetic, economic, cultural or digital identity of the Data Subject.

Proprietary information: Information, data, software, drawings, designs, specifications, hardware, matter, or things of a secret, proprietary, or private nature relating to the business of the Company, including matters of a technical nature (such as know-how, processes, data, and techniques), matters of a business nature (such as information about schedules, costs, profits, markets, sales, and customers), matters of a proprietary nature (such as information about patents, patent applications, copyrights, trade secrets, and trademarks), or other information of a similar nature that gives the Company a competitive advantage in the marketplace.

Retaliation: Retaliation is negative action taken against an employee who makes a complaint, raises a concern, provides information, or otherwise assists in an investigation. Retaliatory actions may include, but are not limited to, termination; layoffs; demotion; discipline; denial of benefits, overtime, or promotions; intimidation; failure to hire or re-hire; reassignment; or reduction in pay and hours.

Sanctions: Sanctions, or trade sanctions, are trade restrictions imposed on certain persons, entities, or industries, or on certain activities.

Trade secret: A trade secret is information, including a formula, pattern, compilation, program, device, method, technique, process, or know-how, that has economic value because it is not known to the public.

UK Bribery Act: The Bribery Act 2010 (c.23) is an Act of the Parliament of the United Kingdom that covers the criminal law relating to bribery.



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Harold
Newington, New Hampshire,
USA

Global Policies and Procedures

In addition to Westinghouse Global Policies and Procedures, regional and country specific policies should also be followed.

| Section | BMS Policy or Procedure # | Policy or Procedure Name/Link |
|---|---------------------------|---|
| Respect Others | BMS-LGL-5 | Nondiscrimination and Anti-Harassment Policy |
| | BMS-LGL-6 | Equal Employment Opportunity |
| Honor our Customers and Suppliers | N/A | Westinghouse Supplier Code of Conduct |
| Compete Fairly | BMS-LGL-34 | Competitive Law Compliance Manual |
| Prevent Corruption | BMS-LGL-11 | Anti-Bribery and Corruption Policy |
| | BMS-LGL-100 | Mergers and Acquisitions and Business Partner Anti-Corruption Due Diligence |
| | BMS-LGL-66 | Global Intermediary Procedure |
| | BMS-AMER-2 | Westinghouse Ticket Policy |
| Participate in the Political Process in Compliance with all Regulations | BMS-LGL-101 | Global Procedure on Political Contributions |
| | BMS-COM-5 | Global Procedure on Charitable Donations & Volunteerism |
| | BMS-LGL-22 | Global Policy on Gifts, Hospitality and Travel |
| Act in the Best Interest of the Company | BMS-LGL-24 | Personal Conflict of Interest |
| Trade Lawfully | BMS-LGL-73 | Global Trade Compliance Company Directive |
| | BMS-LGL-87 | U.S. Export Manual |
| | BMS-LGL-65 | U.S. Import Manual |
| | BMS-LGL-96 | EU Export Manual |
| | BMS-LGL-70 | China Technology Control Plan |
| | BMS-LGL-90 | China Import Compliance Manual |
| | BMS-LGL-91 | Antiboycott Procedure |
| | BMS-LGL-31 | Denied Party & Embargo Screening Procedure |
| Be Accurate and Transparent | BMS-FIN-12 | Controller's Manual Governance Policy |

(Global Policies and Procedures, continued)

| Section | BMS Policy or Procedure # | Policy or Procedure Name/Link |
|---|---------------------------|--|
| Maintain Confidentiality | BMS-LGL-8 | Privacy of Electronic Information |
| | BMS-LGL-105 | Personal Data Protection and Privacy Policy |
| | BMS-LGL-28 | The Classification, Reclassification and Release of Westinghouse Proprietary Information |
| | BMS-LGL-29 | Guidance on Copyright |
| | BMS-LGL-32 | Process for Handling Proprietary Information |
| | BMS-LGL-36 | Computer Software Intellectual Property Management |
| | N/A | See the Intellectual Property Committee page on george for the latest Patent Invention Procedure |
| | BMS-LGL-48 | Guidance on Trademarks and Service Marks |
| | BMS-IS-46 | Westinghouse Global Information Security Policy |
| | BMS-SEC-1 | Security and Asset Protection |
| BMS-COM-4 | Social Media Policy | |
| Be Safe and Secure, Protect the Environment and Deliver Quality | BMS-ECP-1 | Employee Concerns Program Procedure |
| | BMS-NSC-1 | Maintaining a Positive Nuclear Safety Culture and Safety Conscious Work Environment |
| | N/A | Commitment to Nuclear Safety Culture |
| | N/A | Quality Management System-A (QMS) |
| | BMS-SUS-1 | Product Sustainability |
| | POL-WEC-001 | QEHS Policy |
| | | Search “EHS” in george for company-wide EHS policies procedures, and guidelines. |
| Live the Code— Seek Help and Speak Up | BMS-LGL-92 | Ethics and Concerns Reporting and Investigations Policy |



this is my
CODE

Peter
Västerås, Sweden