

# Supplier Code of Conduct





**ALL SUPPLIERS ARE REQUIRED TO FOLLOW THIS SUPPLIER CODE OF CONDUCT** including contractors, subcontractors and suppliers of products and services with whom Westinghouse, its affiliates, subsidiaries and business units worldwide have contractual relationships.

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**Westinghouse is committed to the highest standards of safety, ethics, service, quality, legal compliance and respect for human rights.**

## LETTER FROM THE CHIEF PROCUREMENT OFFICER

**ALL SUPPLIERS ARE REQUIRED TO FOLLOW THIS SUPPLIER CODE OF CONDUCT including contractors, subcontractors and suppliers of products and services with whom Westinghouse, its affiliates, subsidiaries and business units worldwide have contractual relationships.**

At Westinghouse, we are focused on remaining the first choice for safe, clean and reliable energy solutions. To do so requires a robust commitment to the highest standards of service, quality, safety, ethics, legal compliance, and respect for human rights. As a supplier of Westinghouse, we expect that you share these values.

Westinghouse has developed our Supplier Code of Conduct – more commonly referred to as “the Code” throughout this document – to clearly outline the minimum economic, environmental, social and corporate governance standards of business conduct and acceptable business practices for our Suppliers.

### **Westinghouse will remain the first choice for safe, clean and efficient energy solutions:**

#### **We enhance our delivery of that vision by living our values:**

- Safety & Quality First
- Valuing Ethics, Integrity & Diversity
- Passion for Serving Our Customers Globally
- Dedication to Each Other Through Servant Leadership
- Creating Value for Shareholders, Customers & Employees
- Consistently Delivering Our Commitments

One significant element of the Code is the Westinghouse Global Ethics and Concerns Helpline, which provides a confidential channel to raise questions or concerns. As explained in the Code, our zero tolerance policy for retaliation goes hand-in-hand with our belief that speaking up is always the right thing to do.

To do business with Westinghouse, we expect our Suppliers understand and comply with this Code. As a global company with customers across the world, we recognize there may be different legal and regulatory environments in which our Suppliers operate. Suppliers must comply with the most restrictive of these requirements – either this Code or local laws or regulations.

On behalf of Westinghouse, I hope that you recognize the pride we take in our commitment to these fundamental principles and understand how integral you – our Suppliers – are to delivering excellence.

**Raj Bhan**

*Senior Vice President, Chief Procurement Officer*

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**Westinghouse has a ZERO tolerance policy for any and all forms of bribery and corruption. Westinghouse does not pay bribes to further its business, either directly or indirectly, to anyone for any reason.**

## **Anti-Bribery and Corruption**

Westinghouse has a ZERO tolerance policy for any and all forms of bribery and corruption. Westinghouse does not pay bribes to further its business, either directly or indirectly, to anyone for any reason. Suppliers are prohibited from giving, offering, or promising anything of value to any person for the purpose of furthering Westinghouse's business or the Supplier's business interests. All Suppliers must understand and comply with the anti-corruption laws, directives, and regulations that govern operations in the countries in which they do business.

Westinghouse prohibits facilitating payments, also known as grease payments. These are small payments to encourage individuals to perform actions that they are already required to perform, such as clearing goods through customs or issuing a permit.

If a Supplier intends to engage an Intermediary (an entity that will represent the interests of Westinghouse to or with another entity), prior approval of the intermediary relationship is required from the Westinghouse Global Ethics and Compliance Organization.

Suppliers must report known or suspected bribery and corruption, including allegations involving intermediaries and facilitation payments, to Westinghouse Global Ethics and Compliance Organization immediately.

See contact information on page 14 of this document

## **Gifts, Hospitality and Travel Compliance**

Professional relationships with Suppliers and Intermediaries are vital to the work of Westinghouse; however, giving and receiving gifts or entertainment can potentially affect the independent judgment of both Westinghouse and its customers, and may create the appearance of favoritism or impropriety. Suppliers shall not provide any gifts, meals, entertainment or travel in any situation in which it might influence or appear to influence a business decision that impacts Westinghouse.

Westinghouse prohibits giving any gifts, regardless of value, to anyone. No gifts shall be given to anyone in furtherance of Westinghouse business.

Westinghouse personnel may accept supplier logo or branded items of nominal value. Westinghouse personnel are also allowed to accept modest hospitalities (e.g., business meals), entertainment (e.g., tickets to sporting events) and travel that are legal and permissible under local laws and regulations. Receipt of any hospitalities over \$100 USD per person, as well as receipt of all entertainment and travel requires pre-approval from the Westinghouse Global Ethics and Compliance Organization.

## **Charitable Donations and Political Contributions**

If a Supplier intends to make a charitable donation or political contribution that is directly related to or associated with Westinghouse's business interests, prior approval from the Westinghouse Global Ethics and Compliance Organization is required (see contact information on page 14 of this document).



## **Communications, Social Media, Public and Media Inquiries**

Westinghouse is committed to protecting the confidentiality of our business and our Suppliers as well. All communications including social media, press releases, or use of the Westinghouse logo is prohibited without prior written consent and approval by Westinghouse Global Communications.

## **Competition and Antitrust**

Westinghouse business activities are subject to antitrust laws. Westinghouse competes fairly on the basis of price, superior quality, service and value of our products or services. We do not restrain trade, competition, prices, terms or markets, or collude with other parties about any of these competitive factors. Westinghouse also markets, advertises and collects market data fairly and honestly. Suppliers must comply fully with the letter and spirit of laws designed to preserve free and open competition. These laws apply to various activities including marketing, procurement, contracting and mergers and acquisitions. Antitrust laws are complex, and the requirements are not always obvious. Suppliers who have any questions regarding the applicability of antitrust laws to a particular situation are encouraged to consult with Westinghouse or their own legal counsel.

## **Conflicts of Interest**

Westinghouse expects Suppliers to exercise reasonable care and diligence to prevent any actions or conditions that could result in a conflict with the interests of Westinghouse, as well as actions or situations that may create an appearance of a potential conflict of interest. Suppliers must provide written notification to Westinghouse in situations where an actual or potential conflict of interest exists in relation to Westinghouse work.

## **Discrimination and Harassment**

Suppliers are expected to comply with all applicable local, state and federal/national legal requirements and commit to a workplace free from discrimination, harassment, physical coercion, and any form of workplace violence and to report acts of discrimination or harassment by notifying the Westinghouse Global Ethics and Compliance Organization (see contact information on page 14 of this document).



## Environment

Environmental responsibility and operational sustainability are essential to supplying leading-edge technology to satisfy the world's growing demand for energy. Westinghouse expects Suppliers to demonstrate a commitment to responsible environmental stewardship. Westinghouse is focused on minimizing its environmental footprint across its entire value chain.

*Westinghouse is focused on minimizing its environmental footprint across its entire value chain.*

Suppliers must comply with all applicable environmental laws, regulations and standards, including those prohibiting or restricting the use or handling of specific substances. Suppliers may be required to disclose and validate material content of products or components, as well as the origin of those materials.

Suppliers are expected to implement environmental management systems (e.g., ISO 14001), as applicable, at Westinghouse's direction, and focus on continuously monitoring and improving their environmental performance. Suppliers should strive to eliminate or reduce waste of all types, including waste of water, energy and materials. Westinghouse may request performance metric data to ensure compliance (e.g., greenhouse gas data).

## Product Quality Excellence

Suppliers are expected to establish and implement an appropriate quality assurance system (ISO 9000 series or equivalent), as applicable, at Westinghouse's direction, with a goal of improving and maintaining the quality of products and services delivered to Westinghouse.

The system is expected to:

- Ensure compliance meets or exceeds the applicable safety standards of the countries in which Suppliers operate and/or to which the products or services are intended to be sold or delivered.
- Ensure compliance meets or exceeds industry best practices, or contractually agreed quality requirements or specifications in order to provide goods and services that consistently meet the needs of Westinghouse, perform as warranted, and are safe for their intended use.
- Foster a continuous improvement program and have a process for timely correction of any deficiencies identified by an internal or external audit, assessment, inspection, investigation, or review.

## Human Rights

Suppliers shall support and respect internationally recognized human rights. Suppliers shall not use, or participate in the exploitation of workers, forced or involuntary labor. Suppliers are to treat people with respect and dignity, encourage diversity, remain receptive to diverse opinions, promote equal opportunity for all, and foster an inclusive and ethical culture, in accordance with the relevant International Labour Organization Conventions.

## Slavery and Human Trafficking

Suppliers shall not utilize modern slavery methods in their supply chain. Modern slavery refers to activities resulting in abuse of human rights, forced, bonded (including debt bondage), or indentured labor; involuntary prison labor; sex trafficking; slavery, servitude, and forced or compulsory labor and human trafficking. Suppliers shall comply with all applicable laws, statues, and regulations in force regarding modern slavery and human trafficking, including but not limited to the U.K. Modern Slavery Act 2015 and any successor legislation.

## Child Labor

Suppliers must ensure compliance with all applicable laws governing and protecting child labor and must employ only workers who meet the applicable minimum legal age requirement in their countries of operation.

## Wages, Benefits, Hours, and Labor Unions

Suppliers are expected to comply with all applicable laws regarding employee wages, benefits, hours of work, and working conditions and shall not discriminate against employees who are associated or affiliated with a legally sanctioned labor union.

## Information Protection

Information confidentiality and security is a critical priority for Westinghouse. Suppliers may have access to information belonging to Westinghouse, its employees, customers, or other third parties.

Suppliers must maintain the confidentiality of all information obtained in the course of the business relationship with Westinghouse and shall not disclose such information to other parties without the express written consent of Westinghouse.

Suppliers bear the responsibility for protecting Westinghouse's information from unauthorized access, disclosure or loss, in accordance with all applicable data privacy and information security laws.

Suppliers that are granted access to Westinghouse's secured Information Technology Systems and Resources must comply with all applicable Westinghouse usage and information security policies and standards.

Suppliers are expected to respect and comply with all the applicable laws governing intellectual property rights assertions, including protection against disclosure, patents, copyrights, and trademarks.

Suppliers must not reproduce or transfer copyrighted software, documentation, or other materials without the prior written consent of Westinghouse.



## Insider Trading

While working with Westinghouse, a Supplier may receive access to or become aware of material non-public information either about Westinghouse, a controlled affiliate or an unrelated publicly traded entity. Suppliers, and their personnel, must not use any non-publicly disclosed information obtained in the course of their business relationship with Westinghouse as the basis for trading or for enabling others to trade in the stock or securities of any company.

## Management Systems

Suppliers are expected to implement management systems to facilitate compliance and traceability with all applicable laws and to promote continuous improvement with respect to the expectations set forth in this Code. This includes the following aspects:

- Implementation of mechanisms to identify, determine and manage risks in all areas addressed by this Code and with respect to all applicable legal requirements.
- Establishment of training measures to allow employees to gain an appropriate level of knowledge and understanding of the contents of this Code, the applicable laws, and generally recognized standards.



## Nuclear Safety

Westinghouse expects their Suppliers to be active in providing products and services for the nuclear power industry to maintain a strong nuclear safety culture, in which the following safety elements or disciplines apply:

- Nuclear Safety
- Industrial/Personnel Safety
- Radiological Safety
- Environmental Safety

## Product Sustainability and Responsible Sourcing

Westinghouse sustainability guidelines require Suppliers to ensure that any material, component, part, service, and/or product (deliverable) purchased by Westinghouse, meets all applicable environmental regulatory and contractual requirements and is produced, delivered, and handled at its end-of-use with minimal environmental impacts. Furthermore, Westinghouse will show preference, when possible, to those Suppliers who pursue sustainable practices and provide deliverables that are produced with minimal environmental impacts.

## Privacy and Data Protection

Suppliers must comply with applicable data privacy laws and with the data privacy instructions provided by Westinghouse.

Suppliers are required to respect privacy rights and to ensure the security and confidentiality of personal data of Westinghouse employees, customers, and suppliers, implementing and maintaining adequate physical, organizational and technical measures in order to prevent accidental, unauthorized or unlawful destruction, alteration, modification or loss of personal data, misuse of personal data or unlawful processing of personal data.

Suppliers shall notify Westinghouse promptly (within 24 hours) following the discovery of any suspected breach or compromise of the security, confidentiality, privacy or integrity of Westinghouse personal data or information by notifying the Westinghouse Global Ethics and Compliance Organization (see contact information on page 14 of this document), unless the Suppliers' contract with Westinghouse provides a different protocol.

## Security

Suppliers shall have robust security practices across their supply chains. Suppliers shall maintain processes and standards that are designed to assure the integrity of each shipment to Westinghouse or its customers from its origin through to its destination and all points in between.

Suppliers are expected to implement the necessary and appropriate measures in their area of responsibility to ensure that Westinghouse products, components or raw materials as well as the corresponding know-how do not end up in the possession of counterfeiters or unauthorized third parties.

Suppliers and their representatives must adhere to all required security measures and requests while on Westinghouse premises, cannot circumvent security controls or processes, and must protect Westinghouse resources and information.

Westinghouse prohibits violence in the workplace. Verbal or physical acts of violence are forbidden by Westinghouse and will not be tolerated by personnel or Suppliers. Any threats or incidents of violence involving a Westinghouse employee or Westinghouse facility must be reported to Westinghouse Security at (United States) 412-374-2020.

Suppliers and their representatives are not permitted to bring any articles onsite that are listed as Westinghouse property entry restrictions. This includes firearms and other weapons, explosives, incendiary devices, consumable alcohol of any kind, illegal drugs and associated paraphernalia, pets, and any other item prohibited by law.

## Small and Diverse Supplier Utilization

Westinghouse places high importance on building an increasingly diverse supplier pool represented by small and diverse businesses. Westinghouse also encourages its Suppliers to value small and diverse businesses and make them an important component of their own supply chain. Westinghouse may request Suppliers to report their second tier spend to the Westinghouse Supplier Diversity Program Lead.

## Trade Compliance

Westinghouse Suppliers must ensure that their business practices are in accordance with all applicable laws and regulations controlling the export and import of goods, software, and technology across all borders. Suppliers must report non-compliant trade practices including but not limited to actual or potential inadvertent release, export or misuse of Westinghouse products, software or technology. Noncompliance shall be reported to the Westinghouse Global Ethics and Compliance Organization (see contact information on page 14 of this document).

## Reporting and Non-Retaliation

The standards of conduct described in this Code are critical to the ongoing success of Westinghouse's relationship with its Suppliers. Suppliers and their personnel must report any conduct of the Westinghouse employee or business partner that is perceived as unethical or in violation of law, the Westinghouse Global Ethics Code for employees, or this Code.

If a Supplier is aware of suspected misconduct, illegal activities (including but not limited to inappropriate payments to foreign public officials), fraud (including but not limited to bribery of government officials, commercial bribery, accounting issues or misappropriation or misuse of Westinghouse corporate assets), it is the Supplier's responsibility to report these concerns immediately. Westinghouse has a zero tolerance policy towards any forms of retaliation for reports in good faith.

**Suppliers may report concerns by calling the confidential Westinghouse Global Ethics and Concerns Helpline using the numbers below or by using the web reporting:**

### BELGIUM

**Step 1: Dial** 0-800-100-10

**Step 2:** at the prompt enter 8442384380

### CANADA

1-844-238-4380

### CHINA

**Step 1: Dial**

Southern - 10-811

Northern - 108-888

**Step 2:** at the prompt enter 8442384380

### 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 8442384380

### 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.wecc concerns.com](http://www.wecc concerns.com)

[ethicsandcompliance@westinghouse.com](mailto:ethicsandcompliance@westinghouse.com)

### Global Ethics & Compliance Organization

Westinghouse Electric Company, LLC

1000 Westinghouse Drive

Cranberry Township, PA 16066-5528

[www.wecc concerns.com](http://www.wecc concerns.com)

**Suppliers may also contact the Westinghouse Global Ethics and Compliance Organization directly by sending an email: [ethicsandcompliance@westinghouse.com](mailto:ethicsandcompliance@westinghouse.com) or by contacting Westinghouse by mail:**

### Ethics & Compliance

Attn: Chief Compliance Officer

Westinghouse Electric Company LLC

1000 Westinghouse Drive

Cranberry Township, PA 16066



[www.westinghousenuclear.com](http://www.westinghousenuclear.com)

