

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.**



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LETTER FROM THE CHIEF PROCUREMENT OFFICER

At Westinghouse, we are focused on working together as we advance technology and services to power a clean, carbon-free future through a net-zero approach. **Sound Environmental Social Governance (ESG) practices are integral to building resilient businesses and creating long-term value for our investors and other stakeholders.** To do so requires a robust commitment to the highest standards of safety, quality, integrity, trust, legal compliance and respect for human rights. As a supplier of Westinghouse, we expect that you share these values.

Westinghouse has developed this 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:

- Customer Focus & Innovation
- Speed & Passion to Win
- Teamwork & Accountability

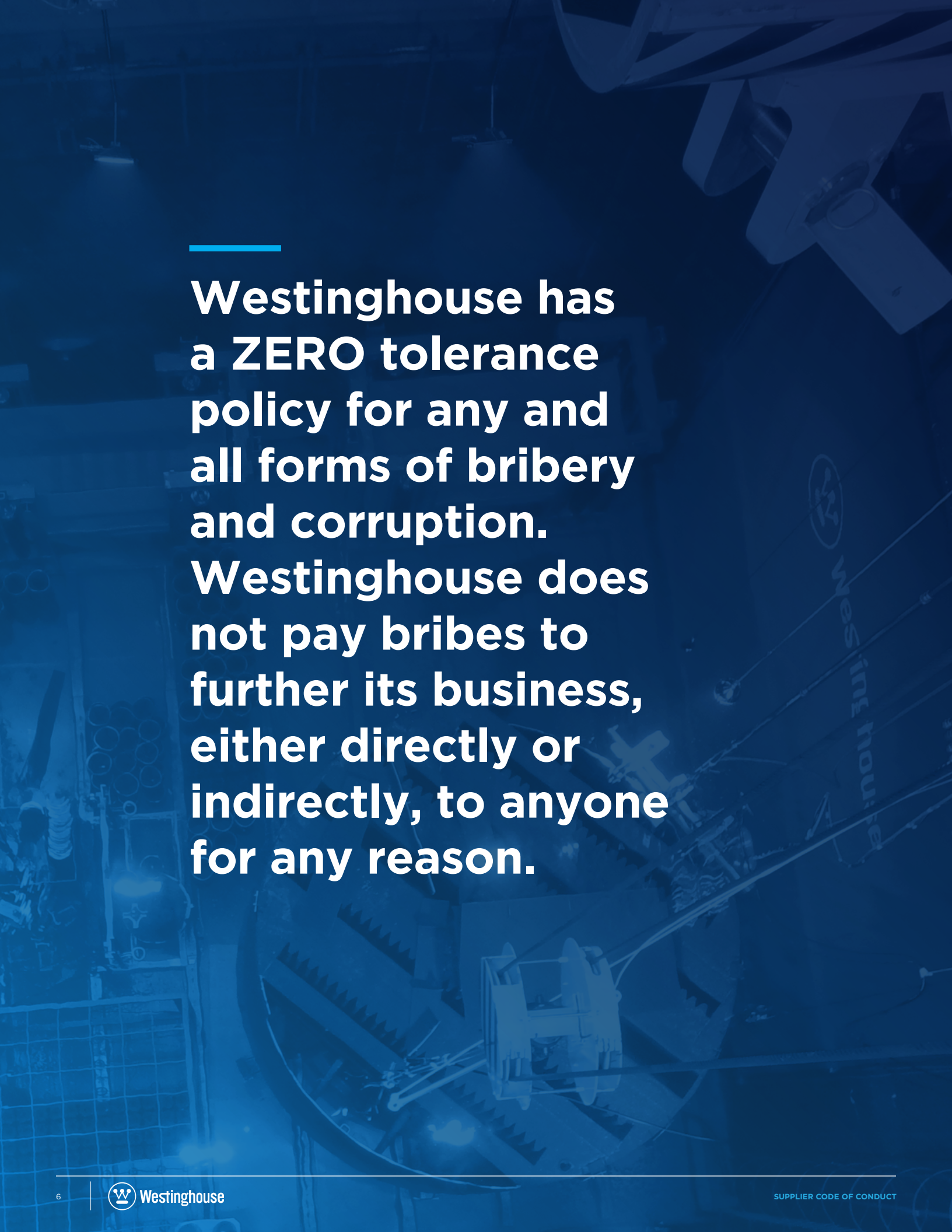
One significant element of the Code is the [Westinghouse Global Ethics and Concerns Helpline](#), which provides a confidential channel to raise questions or concerns. As explained in the Code, our **ZERO tolerance** policy for retaliation goes together with our belief that speaking up is always the 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, we recognize how integral our supply partners are to success. Adherence to these standards, and our collective focus on performance will be how we win together. We take in our commitment to these fundamental principles and understand how integral you – our Suppliers – are to delivering excellence.

Christopher Mapes

Vice President, Chief Procurement Officer



**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.**

Compliance With This Supplier Code of Conduct

Suppliers will ensure that their personnel, contractors, agents, and other representatives understand and comply with this Code. We expect our Suppliers to share our commitment to the minimum standards and principles in this Code and to have their own internal policies and procedures in place to support and monitor their compliance with such commitment. Westinghouse reserves the right to monitor, assess and audit all vendors according to this Code.

Where incorporated into any contract, this Code will survive the contractual term. Westinghouse expects that Vendors will:

- a) Promptly notify Westinghouse as soon as it becomes aware of any actual or suspected breach of this Code. The contents of this Code are additional to and do not in any way affect or prejudice any of Westinghouse's rights and remedies under the relevant agreements with each Supplier, if any. In the event of any non-compliance to the requirements of this Code or breach of agreement, Westinghouse reserves its rights and retains the sole discretion to exercise any rights under this Code, any relevant agreement and/or local laws and regulations. The failure or omission by Westinghouse to insist upon strict performance and compliance with any of the provisions of this Code at any time shall in no way constitute a waiver of its rights.
- b) Cooperate with Westinghouse to ensure its compliance with applicable laws and regulations. This includes responding to Westinghouse's reasonable requests for information, maintaining adequate documentation of compliance programs and obtaining compliance certifications as reasonably requested.

In addition to the above:

- c) We may require suppliers of certain goods and/or services to periodically confirm in writing that they meet the requirements of this Code.
- d) In the event of any conflict or ambiguity between any provision of this Code and the provisions of any relevant agreement with any Supplier, the provisions of that agreement will prevail.
- e) Failure to comply with this Code may result in termination of the relationship with the supplier.
- f) This Code is subject to modification from time to time. The latest version of this Code is available [here](#).

Legal and Regulatory Compliance

Westinghouse has global business activities and is subject to the supervision of numerous regulators. Westinghouse expects all Suppliers to understand and comply with all applicable laws and regulations including those related to Trade Compliance. Westinghouse also expects all Suppliers to maintain all appropriate licenses, permits and other regulatory authorizations and requirements necessary to conduct the activities for which they have been hired by Westinghouse.

Anti-Bribery and Corruption

Westinghouse has a **ZERO tolerance** policy for any and all forms of bribery and corruption, including facilitating payments. Westinghouse does not provide, offer or request bribes to further its business, either directly or indirectly, to anyone for any reason. Suppliers are prohibited from providing, offering to provide, 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.

If any supplier, in furthering Westinghouse's business intends to subcontract, hire, or engage any other third party, including any intermediaries, prior approval is required from the Westinghouse Legal and the Global Compliance Organization.

Suppliers are not allowed to make or promise to make any payments of money or anything of value to any third parties, including public officials, political parties, candidates for public office, charitable organizations or other business partners to improperly influence any act or decision of such official or person for the purpose of promoting the business interests of Westinghouse in any respect, or otherwise in violation of applicable law. This includes a prohibition on "facilitating" payments, also known as great payments, of any kind (small payments made to encourage someone to perform or speed up the performance of routine functions that they are already required to perform, such as issuing permits, licenses or other official documents; processing governmental paperwork, such as visas and work orders; clearing goods through customs, loading and unloading cargo, and actions of a similar nature).

Suppliers must promptly and proactively report all known or suspected instances of bribery and corruption, including allegations involving intermediaries and facilitating payments to [Westinghouse Global Ethics and Compliance Organization](#) at ethicsandcompliance@westinghouse.com immediately.

See contact information on page 17 of this document.

Anti-Money Laundering and Tax Evasion

Westinghouse has a zero-tolerance approach toward illegal activities, including money laundering and tax evasion. Suppliers must comply with all applicable anti-money laundering laws. Suppliers must not knowingly facilitate a person committing to the fraudulent evasion of tax.



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.

Westinghouse personnel are 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 and are compliant with Westinghouse's policies. Receipt of any travel from a supplier requires pre-approval from the Westinghouse Global Ethics and Compliance Organization.

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. Westinghouse personnel may accept supplier logo or branded items of nominal value.

Suppliers shall not provide any gifts, hospitalities, entertainment or travel to Westinghouse employees in any situation in which it might influence or appear to influence a business decision that impacts Westinghouse. Suppliers are not authorized to offer anything of value, including any gifts, hospitalities, entertainment or travel to any third parties, including public officials, on behalf of Westinghouse.

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 Compliance Organization](#) is required (see contact information on page 17 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 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. 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. You must not (i) fix or control prices, either by agreeing directly with a competitor, or any other method; (ii) structure bids to direct a contract to a certain competitor or reseller (bid rigging); (iii) boycott suppliers or customers; (iv) divide or allocate markets or customers; or (v) limit the production or sale of products. These arrangements may be in violation of anti-trust laws and Westinghouse policy and must be avoided. 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 and 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 refrain from entering into business relationships or transactions with Westinghouse personnel in an individual capacity or in any way that could create the appearance of a conflict of interest or impropriety. Suppliers must provide written notification to Westinghouse in situations where an actual or potential conflict of interest exists in relation to Westinghouse work. Suppliers should avoid or appropriately manage any actual or potential conflicts of interest arising due to either personal or business relationships.

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 17 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.

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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 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 and 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.

Westinghouse is committed to working together with its sub-suppliers to deliver excellence. To support these expectations, Westinghouse has developed the Westinghouse Supplier Requirements Manual (SRM-24), defining the minimum quality management system requirements and performance expectations for suppliers of items and/or services to Westinghouse.

Human Rights

Westinghouse respects and supports human rights and requires that workers are treated with dignity, respect and in accordance with applicable laws. Westinghouse expects our Suppliers to respect human rights and maintain processes to identify and prevent adverse human rights impacts that could arise from their or their suppliers' operations. 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 Labor Organization Conventions. Please see [Westinghouse's Anti-Slavery and Human Rights Policy](#) for additional information.

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, statutes, 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. Please see [Westinghouse's U.K. Modern Slavery Statement](#) for additional information.

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 shall comply with all applicable insider trading and securities laws while working with Westinghouse. 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 that are 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

For more information, see the [Nuclear Regulatory Commission website](#) for more details on safety culture policy, oversight, outreach materials, and other information related to safety culture.

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 17 of this document), unless the Suppliers' contract with Westinghouse provides a different protocol.

Responsible Use of Artificial Intelligence

Westinghouse is committed to ensuring that our use of artificial intelligence (AI) is ethical, trustworthy and aligned with our values and principles. We expect the same from our suppliers who provide us with AI solutions or services. Suppliers must comply with all applicable laws and regulations regarding the use of AI, as well as our policies and contractual obligations. Suppliers must ensure that their AI solutions or services are aligned with our values and principles, and that they support our goals and objectives. Westinghouse further remains committed to transparency of AI and expects its suppliers to disclose AI capabilities in their products and solutions, as well as further evidence of explainability of AI capabilities to allow for appropriate risk assessment of AI solutions.

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.

Supplier Diversity

Westinghouse is committed to supporting and respecting all communities across our service territory. We ensure small and diverse businesses have the opportunity to partner with us - including women-owned, minority-owned, service-disabled veteran-owned, veteran-owned, LGBTQ+-owned, disability-owned, HUBZone and small disadvantaged businesses. A diverse supplier base leads to improved supplier performance, more competitive pricing, better risk mitigation and enhanced creativity and innovation.

Suppliers are expected to share Westinghouse's commitment to Supplier Diversity by subcontracting with small and diverse suppliers, conducting and maintaining size and diversity status verifications and complying with reporting requirements.

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. The applicable laws include the U.S. Department of Energy's regulations at 10 CFR 810, the Nuclear Regulatory Commission's regulations at 10 CFR 110, the Export Administration Regulations, the International Traffic in Arms Regulations, sanctions programs managed by the U.S. Department of Treasury and EU 2021/821. 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 17 of this document).

Record Keeping

We expect suppliers to maintain accurate business records relating to their business dealings with us and not to alter, distort or conceal such records. We further expect suppliers to retain records that may be relevant to any pending or threatened legal or regulatory proceeding of which the supplier becomes aware.

Business Continuity and Disaster Recovery

We expect our Suppliers to have adequate business continuity and disaster recovery plans in place designed in accordance with industry standards to maintain continuity of services to a reasonable degree after the occurrence of an event that results in an interruption or suspension of services. Suppliers are expected to be proactive and notify Westinghouse in a reasonably timely manner should such an event occur. Upon request by Westinghouse, Suppliers will disclose in reasonable detail and discuss the elements of their business continuity plans.

Insurance

Suppliers will maintain all required insurance coverage needed to provide services to Westinghouse. Suppliers will provide documents to Westinghouse as proof of insurance coverage upon request.

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) or 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 toward any forms of retaliation for reports in good faith.

**Concerns can be reported via the Ethics and Concerns Helpline by phone or web report.
Web reports can be submitted at www.weconcerns.com**

BELGIUM ETHICS AND CONCERNS HELPLINE

0800-27-178

BRAZIL ETHICS AND CONCERNS HELPLINE

0800-000-2808

BULGARIA ETHICS AND CONCERNS HELPLINE

0800-46-351

CANADA ETHICS AND CONCERNS HELPLINE

1-844-238-4380

CHINA ETHICS AND CONCERNS HELPLINE

400-120-8512

FRANCE ETHICS AND CONCERNS HELPLINE

0801-13-00-24

GERMANY ETHICS AND CONCERNS HELPLINE

0800-181-6284

ITALY ETHICS AND CONCERNS HELPLINE

800932409

JAPAN ETHICS AND CONCERNS HELPLINE

0066-3386-8128

MEXICO ETHICS AND CONCERNS HELPLINE

800-077-0794

POLAND ETHICS AND CONCERNS HELPLINE

800-005-088

SOUTH KOREA ETHICS AND CONCERNS HELPLINE

00744906

SPAIN ETHICS AND CONCERNS HELPLINE

900752144

SWEDEN ETHICS AND CONCERNS HELPLINE

020-12-77-44

UKRAINE ETHICS AND CONCERNS HELPLINE

0800-800-682

UNITED KINGDOM ETHICS AND CONCERNS HELPLINE

0800-066-8792

UNITED STATES ETHICS AND CONCERNS HELPLINE

1-844-238-4380

www.weconcerns.com

Suppliers may also contact the Westinghouse Global Ethics and Compliance Organization directly by sending an email: 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

