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## Anti-Slavery and Human Rights Policy

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#### 1.0 Application and Statement Policy

Westinghouse is committed to conducting its business in an ethical and responsible manner. Respecting human rights is fundamental to our business and integrated throughout our decision making, governance and operations.

We seek to identify and prevent adverse human rights impacts within our businesses and supply chain and to act in a way that aligns with international human rights standards, including the United Nations Guiding Principles on Business and Human Rights, the United Nations Universal Declaration of Human Rights, and the International Labor Organization's 1998 Declaration on Fundamental Principles and Rights at Work.

We seek to treat our employees, customers, suppliers, and the communities in which we operate with dignity and in a manner that respects human rights. This includes a commitment to the elimination of forced or compulsory labor; the abolition of child labor; the right to a safe and healthy workplace free of discrimination and harassment, where people are treated fairly irrespective of race, sex, nationality, ethnicity, language, religion, sexual orientation, gender identity and expression, employment and occupation or any other status; recognizing the rights to freedom of association and collective bargaining; and the provision of wages that meet or exceed those required by law.

We embed Human Rights principals and standards into all of our core business activities, including the Westinghouse Global Ethics Code, global compliance training, communications, contracts, and business partner due diligence processes, as appropriate. These practices extend to our interactions with our key suppliers and other business partners.

This Human Rights Policy applies to every employee of Westinghouse, its wholly owned or controlled affiliates, subsidiaries, and Joint Ventures. This Policy also applies to our officers and the Board of Directors. We expect contractors, consultants, agents, and other business partners working with or on behalf of Westinghouse to comply with this Policy.

We recognize the roles played by suppliers, vendors, customers, and other business partners in helping us fulfill the objectives in this Policy. We expect our business partners to share the Company's commitment to respect human rights, as set forth in this Policy. Recognizing that each entity in our business partner network should seek to undertake its own efforts to address human rights issues, we support their own efforts on this subject.

#### 2.0 What is Modern Slavery

Modern slavery is a crime in many jurisdictions and a violation of fundamental Human Rights. It takes various forms, such as:

1. Slavery, servitude (coercing someone to provide services) and forced or compulsory labor (including instances of unlawful deductions of wages and working extended periods of time without breaks);
2. Human trafficking (arranging or facilitating the travel of a victim with a view to them being exploited);
3. Committing any offense with the intention to commit human trafficking; and
4. Aiding, abetting, counseling or procuring any of these offences.



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There are certain indicators of modern slavery, including:

- Appearance – If the worker appears malnourished, lacks basic hygiene, is dressed inadequately for the work they do (for example, they may lack protective equipment or warm clothing);
- Behavior – If the worker is withdrawn or frightened and has a fear of law enforcement or other authorities and expresses fear or reluctance to seek help from a government or private agency;
- Restricted freedom – If the worker shows signs of their movement being controlled and is unable to leave their work environment (this includes not having control of their passport or other identity/travel documents);
- Reluctance of the contracting party to include modern slavery terms in contracts;
- Negative media screening results regarding human rights abuses including but not limited to, poor worker conditions, forced labor, inhumane treatment of migrant workers, use of child labor;
- Vendors offering cheap, non-market rates that are not explicable by other factors;
- Use of third parties and intermediaries offering recruitment services, particularly where they are providing foreign workers;
- High risk industries and businesses can include construction, agriculture, apparel and textile, manufacturing, domestic services and hospitality; and 1 For purposes of this Policy, “temporary workers” include non-full-time employees and consultants and contractors etc. that work on our premises.
- Businesses with inadequate human resources practices in place, including lack of recruitment policies or transparency regarding the recruitment of the workers who will deliver the contract in high-risk labor-intensive contracts (e.g. cleaning contracts, construction contracts).

### 3.0 Our Approach

As part of our commitment to respect human rights, we have undertaken to establish internal and external mechanisms to help identify, prevent, mitigate, and address potential adverse human rights impacts that may be directly linked to, or caused or contributed to, by our actions. Many of these mechanisms already exist and are integrated into our operations through established policies and tools that address our approach to the identification of modern slavery risks and the steps to be taken to prevent modern slavery and human trafficking in our operations' supply chains. These include:

- Global Ethics Code: The Westinghouse Global Ethics Code sets out how we agree to conduct ourselves and provides a framework to guide our actions, including by carrying out our activities in a manner that respects and supports the protection of human rights through striving for:
  - a. the elimination of discrimination in employment;
  - b. the prohibition of modern slavery, including child and forced labor; and
  - c. the eradication of harassment and physical or mental abuse in the workplace.
- Supplier Code of Conduct: The Code sets out expectations for our suppliers and how they should conduct themselves when providing products and services to Westinghouse, and provides a framework to guide supplier actions, including by carrying out our activities in a manner that respects and supports the protection of human rights through striving for:
  - a. the elimination of discrimination in employment;

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- b. the prohibition of modern slavery, including child and forced labor; and
  - c. the eradication of harassment and physical or mental abuse in the workplace.
- **Supplier Due Diligence and Supplier Management Procedures:** These procedures must be followed when purchasing goods or services for or on behalf of Westinghouse. The procedures include a due diligence protocol that includes anti-slavery considerations, which apply when engaging or renewing high-risk third-party suppliers.
- **Counterparty Expectations:** Legal provisions are included in contractual agreements requiring business partners to comply with Human Rights and anti-slavery clauses, when applicable. Where it is not practicable to negotiate this clause, the relevant business partner should be notified about Westinghouse's commitment to eradicating modern slavery.
- **Global Ethics and Concerns Reporting Policy:** The Westinghouse Global Ethics and Concerns Helpline (the "Helpline") is managed by an independent third-party. The Helpline allows anyone to call anonymously (if they so choose) to report suspected unethical, illegal or unsafe behavior in English and other languages. The Helpline is available toll-free, 24 hours a day, 7 days a week. For further information, refer to the Ethics and Concerns Reporting and Investigations Policy.
- **Anti-Bribery and Corruption ("ABC") Policy and Program:** Our ABC Policy and Program sets out rules with regard to bribery and corruption.
- **Corporate Sustainability Program:** Sets forth the expectations and approach for integrating sustainability principles throughout our business worldwide.
- **Health & Safety Policy: Quality, Environment, Health, & Safety Policy and Programs:** Establishes our commitment and expectations of employees in providing a safe and healthy work environment.
- **Risk Assessments:** Our procedures to prevent Human Rights violations are designed to be proportionate to the risks we face, recognizing that they can vary according to the jurisdictions, sectors, suppliers, the amount of control the company has over its supply chain and other governance factors. Risk assessments are, therefore, integral to Westinghouse's attempts, within its operations, to promote the eradication of Human Rights violations, including modern slavery, in our business and supply chains. The level of slavery risk faced by each Westinghouse entity varies with the type and nature of its business operations. The risk assessment will include an assessment of the nature and extent of exposure to modern slavery risks in Westinghouse's operations globally and in supply chain by its suppliers and third parties, as well as the mitigation strategies implemented as needed. This assessment will be periodic, informed, and documented, and will be updated when significant changes occur in the business (i.e., new acquisitions or new products, transactions or projects lead to new suppliers and/or business partners with a higher risk of modern slavery, violations are suspected or detected, or expansion into new geography/industry). The assessed level of risk will influence the specific procedures and controls that will be implemented to prevent and detect modern slavery. This risk-based approach is designed to enable the efforts



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at Westinghouse to be focused on where they are most needed and can most help eradicate Human Rights violations, including modern slavery.

- Community & Stakeholder Engagement: We seek to proactively engage with stakeholders including local communities where we operate and strive to create shared value. Through our engagement and local assessments, we seek to identify, avoid, prevent, and mitigate potential human rights risks and impacts.

#### 4.0 Communications and Training

Periodic training on this Policy, and about the risks Westinghouse operations face from Human Rights, including modern slavery, in its business and supply chains, will be made available, to key employees who manage relationships with suppliers and as necessary including as part of training for related policies, procedures and protocols.

#### 5.0 UK Anti-Slavery and Human Trafficking Statement

Every organization to which the UK Modern Slavery Act applies must publish annually a public statement of the steps they have taken to eradicate modern slavery in their business and their supply chains. Westinghouse's UK Anti-Slavery and Human Trafficking Statement can be found [here](#).

#### 6.0 Compliance with this Policy and Reporting Concerns

The prevention, detection and reporting of Human Rights violations, including but not limited to modern slavery, in any part of Westinghouse's businesses and supply chains is the responsibility of all of Westinghouse's directors, officers, employees and contractors. Additionally, our business partners working with Westinghouse and on our behalf are required to avoid any activity that might lead to, or suggest, a breach of this Policy. Potential conflicts with this Policy, whether past, current or future, must be notified to Global Compliance and Legal organization through the Westinghouse [Global Ethics and Concerns Helpline](#) as soon as possible in accordance with our Ethics and Concerns Reporting and Internal Investigations Policy. Staff and our business partners are encouraged to raise concerns about any possible modern slavery in any parts of Westinghouse's supply chains in any supplier tier at the earliest possible stage. If anyone has a knowledge that a breach of this Policy has occurred or is likely to occur, they must notify Global Compliance and Legal organizations as soon as possible and in accordance with our Reporting Policy.

Any employee who breaches this Policy will face disciplinary action, up to and including termination. Westinghouse may terminate its relationship with other individuals and organizations working on its behalf if they breach any modern slavery contractual clauses to the extent relevant.

#### 7.0 References

BMS-LGL-16 Global Ethics Code

BMS-LGL-11 Anti-Bribery and Corruption Policy

Westinghouse Supplier Code of Conduct



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8.0 Revision Summary

Revision	Section	Revision Description
0.0	All	Initial Issue