

# Global Policy on Gifts, Hospitality, and Travel

## Approval

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#### Application and Statement of Policy

The Global Policy on Gifts, Hospitality and Travel (the “GHT Policy”) applies to all directors, officers, employees, and contingent labor (collectively, “you”) of Westinghouse Electric Company LLC and Westinghouse Electric UK Holdings LTD., their wholly-owned or controlled subsidiaries and joint ventures, and all organizational units owned, managed, or reporting to them and their senior management anywhere in the world (collectively, “Westinghouse”, the “Company”, “we”, “us”, or “our”). This Policy is applicable to all of the Company’s operations worldwide.<sup>1</sup>

At Westinghouse, we believe in doing business ethically, honestly, and in full compliance with all laws, regulations, and our Global Ethics Code (BMS-LGL-16). The Anti-Bribery and Corruption (ABC) Policy (BMS-LGL-11) sets forth our zero-tolerance position prohibiting all forms of bribery and corruption. Put simply, we do not offer or accept bribes in any form and do not tolerate any form of bribery or corruption in connection with any of our business operations, whether directly or through any of our intermediaries. Applicable anti-corruption laws, including the U.S. Foreign Corrupt Practices Act (“FCPA”), the U.K. Bribery Act of 2010 (“UKBA”), as well as other international anti-corruption laws such as the OECD Convention on Combating Corruption of Foreign Public Officials, and other laws of countries where we do business (collectively, the “ABC Laws”), may view the giving and receiving of gifts, hospitality, and travel as potential bribes depending on the circumstances.

Accordingly, any giving or receiving of gifts or hospitality to a third party *who has an existing or is seeking a potential business relationship with Westinghouse*, must be in compliance with this GHT Policy, the Anti-Bribery and Corruption Policy, and the Global Ethics Code. This policy does not apply to charitable donations, which are governed by the Global Policy on Charitable Donations and Volunteerism (BMS-COM-5). However, some charitable donations may include an aspect of hospitality that may require approval under this GHT Policy. GHT from Westinghouse employees to candidates applying for a position in Westinghouse, to/from Brookfield or Cameco Board Members, and to/from PWROG members are excluded from the scope of this policy.

It is the requestor’s responsibility to confirm budget funding availability prior to submitting the requests for approval to Compliance. Compliance approval does not confirm corporate funding is available for the request.

#### What is Permissible and Impermissible?

Westinghouse’s policy governs the giving and receiving of gifts, hospitality, entertainment, and travel to and from anyone *who has an existing or is seeking a potential business relationship with Westinghouse (“Third Parties”)*. This Policy does not govern the giving or receiving of gifts, hospitality, entertainment, or travel between Westinghouse employees, Westinghouse and its joint venture partners, or between individuals when the activity is personal in nature.

Westinghouse requires that all GHT transactions with Third Parties be:

- Reasonable and appropriate in value and taste, avoiding lavishness and excess;
- Have a legitimate, legal, and appropriate Business Purpose;
- Be properly approved and recorded as required under this Policy;

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<sup>1</sup> WesDyne is responsible for following and implementing appropriate controls to ensure effectiveness of this Anti-Bribery and Corruption Policy.



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- Never be provided based upon the request of the recipient; and
- Be legal and permissible under the local laws or regulations of the recipient.

Whether gifts, hospitality, entertainment, or travel is reasonable and appropriate depends on the situation, recipient, and intention of the provider. Lavishness or excessiveness are subjective, which is why Westinghouse requires that certain gifts, hospitality, entertainment, and travel above various thresholds be approved, as well as why Westinghouse requires these items to be recorded for monitoring purposes.

### Giving Gifts to Third Parties

“Gifts” are anything of value that is given to an individual person. The term is very broad and includes giving items such as flowers, candy, bottles of alcohol, jewelry, memorabilia, or giving someone tickets to an entertainment event (such as a sporting event or music concert) where no Westinghouse person attends the entertainment event with the recipient.

Westinghouse personnel at the Executive Vice President level or above may request the following gifts to be provided throughout his or her organization after approval is granted from the Chief Compliance Officer or his/her delegate:

- Westinghouse logoed materials of modest value. For example, but not limited to, polo-style golf shirts, t-shirts, candy/chocolates, golf balls, notebooks, pens, baseball hats, replica Westinghouse models such as AP1000®, and project commemorative items.
- Condolence or congratulatory flowers containing a Westinghouse note.

**All other gifts are prohibited.**

### Giving Hospitality & Entertainment to Third Parties

“Hospitality” is when something of value, such as meals or beverages, is given to an individual when a Westinghouse person accompanies or joins that individual to discuss business or build relationships, whereas giving that person a gift certificate to use when he or she wishes is a prohibited gift.

“Entertainment” is when something of value is provided that is more than just a meal or beverage, such as golf outings, concerts, sporting events, galas, art shows, and other similar events. However, if no one from Westinghouse attends the event, but a customer or third party does, it is a gift to that individual.

#### Requirements:

- Pre-Approval: All Hospitality and/or Entertainment that will exceed US \$125.00 per person requires pre-approval by the Global Compliance organization, through the appropriate portal.
- Post-Reporting: All Hospitality and/or Entertainment that is greater than US \$50 per person, but did not require Pre-Approval in the section above, must be reported to the Global Compliance organization for record-keeping purposes, through the appropriate portal, before reimbursement for the expense is sought.
- Large Events: If an event will exceed fifty (50) people or US \$5,000, contact the Global Compliance organization prior to authorizing the event or inviting attendees for approval.



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#### Giving Travel to Third Parties

“Travel” is when something of value, such as airfare, hotels, and transportation (including meals related to the travel) are provided to a third party.

**Requirement:** All travel requires pre-approval by the Global Compliance organization, through the appropriate portal, which is reviewed on a case-by-case basis. Please note, providing cash or per diems is not permitted under this policy, but allowances for reimbursement of meals are permissible if appropriately limited and receipts are required for reimbursement. If the travel expense for a third party is required by contract (such as for training), please note this at the beginning of the request.

#### Receiving Gifts, Hospitality, Entertainment, and Travel

**Gifts, Hospitality and Entertainment:** Westinghouse personnel are permitted to accept Gifts, Hospitality, and Entertainment of modest and/or reasonable value from Third Parties. Typically, receipt of meals and hospitality do not need pre-approval or reported. If, however, the receipt of entertainment requires travel and lodging, you must contact the Global Compliance organization for pre-approval. Please note that this pre-approval is not required for modest entertainment (i.e. regular season sporting events, concerts, etc.) that may be offered in conjunction with, or during an already scheduled business trip. Furthermore, if you have questions or concerns whether the receipt of any item may cause an appearance of impropriety, be an attempt to persuade you from conducting your role on behalf of the company, be in violation of local law or any other Westinghouse policy or procedure, you must contact the Global Compliance organization for further guidance.

**Travel:** The receipt of all travel requires pre-approval by the Global Compliance organization, through the appropriate portal, which is reviewed on a case-by-case basis. Please note, accepting cash or per diems is not permitted under this policy, but allowances for reimbursement of meals are permissible if appropriately limited and receipts are required for reimbursement. If your travel expense provided by a third party is required by contract (such as for training), please note this at the beginning of the request.

#### Training, Marketing and Promotional Events

Training, marketing and promotional activities, such as customer technical trainings, kick-off meetings, general marketing meetings, trade shows, recruitment events, and other similar types of group events are not typically subject to this Policy if items, such as gifts, hospitality, or raffle prizes, are made generally available and the event is not specifically targeted towards certain individuals. The acceptance by Westinghouse personnel of invitations to these events or similar publicly available items is also not subject to this Policy. If you have any questions whether an event falls within this category, please contact the Global Compliance organization.

#### Quick Reference Table

	<b>Permissible Items</b>	<b>Requirement: Giving</b>	<b>Requirement: Receiving</b>
<b>Gifts</b>	All gifts satisfying requirements.	Pre-approval	None
<b>Hospitality</b>	All hospitality satisfying requirements	<b>Per person:</b> Under \$50 – None Between \$50-\$125 – Post-Reporting Over \$125 – Pre-approval	None
<b>Entertainment</b>	All entertainment satisfying requirements	<b>Per person:</b> Under \$50 – None	None



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		Between \$50-\$125 – Post-Reporting Over \$125 – Pre-approval	
<b>Travel</b>	All travel satisfying requirements	Pre-approval	Pre-approval

## Reporting & Records Retention

All required pre-approvals and post reporting requests should be completed in the Westinghouse’s Global Compliance solution GAN Integrity which is accessible via the App portal on *george* or can be accessed directly: <https://westinghouse.gan-compliance.com/> and connected to via Azure. For any questions regarding accessing GAN Integrity please contact [ethicsandcompliance@westinghouse.com](mailto:ethicsandcompliance@westinghouse.com).

Please note that you are **required to upload copies of approved GAN requests (both for pre-approvals and post-reporting) into Concur when submitting expense reports.**

You are required to be proactive and promptly report any and all actual or suspected violations of this GHT Policy, or any ABC Laws by the Company, an employee, or any third party to either the Chief Compliance Officer, through the Ethics and Concerns Helpline, or through the helpline website at:

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

The Global Compliance organization can be reached directly at:

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

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

Westinghouse absolutely prohibits retaliation of any type or kind against any person who raises in good faith any questions or concerns, reports an actual or potential violation, or assists in an investigation under this policy.

All pre-approval and post-reporting forms must be attached to receipts during the expense report reimbursement process. Managers must not approve expense reports that do not have the appropriate GHT form. Documentation supporting compliance with this policy must be maintained and made available for internal and external audit review. All documentation must be maintained for a period of at least five years.

## References

- BMS-LGL-16 Global Ethics Code
- BMS-LGL-11 Anti-Bribery and Corruption Policy
- BMS-FIN-1 Global Travel and Entertainment Policy
- BMS-COM-5 Global Procedure on Charitable Donations and Volunteerism



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Revision Summary

Revision	Section	Revision Description
1.0	All	Updated format
2.0	All	Revision of the entire policy
3.0	All	Minor revisions to entire policy
4.0	Reporting	Updated Helpline phone numbers
5.0	All	Updated entire policy
5.1	Cover Page and review of all	Updated Owner 2021 review of entire policy for any needed updates
6.0	Reporting & Records Retention	Added additional reporting instructions
6.1	All	Miscellaneous updates to overall policy
7.0	All	Miscellaneous updates
8.0	Application and Statement of Policy	Added clarification regarding GHT for board members and about budget funding for GHT purchases.