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Nondiscrimination and Anti-Harassment Policy

Note: See this Policy's Frequently Asked Questions (FAQs) for more in-depth information to help further explain specific information in the policy or process steps.

If the FAQs conflict in any way with the policy or the terms of a collective bargaining agreement, the policy or collective bargaining agreement shall govern.

Approval

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1.0 Introduction**1.1 Purpose**

All forms of discrimination and harassment (including, but not limited to, sexual harassment) are prohibited in the workplace. As a result, the Company maintains a strict policy prohibiting discrimination and harassment against applicants and employees based on any legally-recognized status, including, but not limited to: race, color, religion, sex, pregnancy (including lactation, childbirth or related medical conditions), sexual orientation, gender identity/expression, age, national origin or ancestry, physical or mental disability, genetic information (including testing and characteristics), veteran status, uniformed servicemember status, citizenship status, or any other status protected by country, federal, state or local law.

The purpose of this Policy is to unequivocally set forth the Company's policy regarding its commitment to nondiscrimination and a harassment-free work environment. Westinghouse strives to provide a work environment free from harassment and discrimination.

Westinghouse complies with all laws and regulations concerning equal opportunity and nondiscrimination.

1.2 Scope and Applicability

The harassment and discrimination proscribed by this Policy includes conduct by any person involved in our operations, including coworkers, supervisors, managers, temporary or seasonal workers, agents, clients, visitors, vendors, customers of the Company, or any third party involved in the Company's operations, and this Policy specifically prohibits conduct that creates or contributes to a hostile working environment. If an employee believes such harassment or discrimination occurred, or is occurring, that violates this Policy, the procedures in this Policy should be followed.

1. All members of management, at all levels, are accountable for carrying out this Policy within their area of responsibility. All supervisors and managers are responsible for:
2. Implementing this Policy, which includes, but is not limited to, taking steps to prevent discrimination, harassment and retaliation;
3. Ensuring that all employees under their supervision have knowledge of and understand this Policy;
4. Promptly reporting any complaints to the designated Human Resources representative so they may be investigated and resolved in a timely manner;
5. Taking and/or assisting in prompt and appropriate corrective action when necessary to ensure compliance with this Policy; and
6. Conducting themselves, at all times, in a manner consistent with this Policy.

Failure to meet these responsibilities may lead to disciplinary action, up to and including termination.

Human Resources has the responsibility to:

1. At least once every year, communicate this Policy to all employees and inform them of their rights and responsibilities;



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2. Promptly investigate complaints involving alleged violations of the Policy and recommend corrective action; and
3. Maintain records of complaints and ensure that all complaints and subsequent investigations and disciplinary actions are treated in a confidential manner and in accordance with Company policy.

2.0 Definitions

2.1 Sexual Harassment

Sexual harassment, which includes sexual harassment by an individual of one sex directed at a member of the same sex or a different sex, is defined as: unwelcome sexual advances, requests for sexual favors and other visual, verbal, or physical conduct of a sexual nature when:

1. Submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment;
2. Submission or rejection of such conduct by an individual is used as the basis for employment decisions affecting such individual; and/or
3. Such conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile, or offensive work environment.

Sexual harassment also includes various forms of offensive behavior based on sex, sexual orientation and gender identity. The following is a partial list of examples:

1. Unwanted sexual advances or propositions (including repeated and unwelcome requests for dates);
2. Offer of employment benefits in exchange for sexual favors;
3. Making or threatening reprisals after a negative response to sexual advances;
4. Visual conduct, such as leering; making sexual gestures; displaying sexually suggestive or offensive objects or pictures, cartoons, posters, websites, emails or text messages;
5. Verbal and written conduct, such as sexually derogatory or degrading comments; sexual innuendos, epithets, slurs, explicit jokes, or comments, including but not limited to about an individual's body or dress; whistling or making suggestive or insulting sounds;
6. Physical conduct, such as touching, assault and impeding or blocking normal movements; and
7. Retaliation in response to an individual reporting, or threatening to report, sexual harassment.

Harassment is not confined to the workplace and can occur offsite, during non-working hours and non-work venues, as well as on the internet or electronically.

2.2 Other Types of Harassment

Harassment on the basis of any legally protected status is prohibited, including, but not limited to: race, color, religion, sex, pregnancy (including lactation, childbirth or related medical conditions), sexual orientation, gender identity/expression, age, national origin or ancestry, physical or mental disability,



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genetic information (including testing and characteristics), veteran status, uniformed servicemember status, citizenship or any other status protected by country, federal, state or local law. Prohibited harassment may include behavior similar to the illustrations above pertaining to sexual harassment. It also includes, but is not limited to:

1. Verbal conduct, such as taunting, jokes, threats, epithets, derogatory comments or slurs based on an individual's protected status;
2. Visual and written conduct, such as derogatory posters, photographs, calendars, cartoons, drawings, websites, social media, emails, text messages or gestures based on an individual's protected status; and
3. Physical conduct, such as touching, assault and impeding or blocking normal movements because of an individual's protected status.

2.3 Discrimination

Discrimination is defined as the unequal treatment of qualified individuals with respect to their terms and conditions of employment on the basis of their race, color, religion, sex, pregnancy (including lactation, childbirth or related medical conditions), sexual orientation, gender identity/expression, national origin or ancestry, age, physical or mental disability, genetic information (including testing and characteristics), veteran status, uniformed servicemember status, citizenship status, or any other status protected by country, federal, state or local law.

3.0 Compliant Procedure

All claims of harassment, discrimination and retaliation will be promptly, and thoroughly, investigated and corrective action will be taken as warranted by the results of the investigation. Violations of this Policy can have profound 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 applicable).

The Company prohibits unlawful discrimination, harassment, including sexual harassment, retaliation as well as conduct that does not rise to the level of being unlawful. This Policy is not designed or intended to limit the Company's authority to discipline or take remedial action for conduct that violates this Policy that the Company deems unacceptable, regardless of whether that conduct satisfies the definition of unlawful discrimination, harassment, sexual harassment or retaliation.

Any individual who believes they may be a victim of discrimination, harassment (including, but not limited to, sexual harassment) or retaliation or is aware of discrimination, harassment or retaliation should follow the complaint and reporting procedure outlined below.

3.1 Protection Against Retaliation

Retaliation against any person by another employee or by the Company for using this complaint procedure, reporting discrimination or harassment, objecting to such conduct or filing, testifying, assisting or participating in any manner in any investigation, proceeding or hearing conducted by a governmental enforcement agency is prohibited. Prohibited retaliation includes, but is not limited to, termination, demotion, suspension, failure to hire or consider for hire, failure to give equal consideration in making

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employment decisions, failure to make employment recommendations impartially, adversely affecting working conditions or otherwise denying any employment benefit.

Individuals who believe they have been subjected to retaliation or believe that another individual has been subjected to retaliation, should report this concern via the Complaint and Reporting Procedure outlined below. Any report of retaliatory conduct will be investigated in a thorough and objective manner. If a report of retaliation prohibited by this Policy is substantiated, appropriate disciplinary action, up to and including termination of employment, will be taken. If a complaint cannot be substantiated, the Company may take appropriate action to reinforce its commitment to providing a work environment free from retaliation.

3.2 Good Faith

The initiation of a good faith complaint of discrimination, harassment or retaliation will not be grounds for disciplinary action, even if the allegations cannot be substantiated. Any individual who makes a complaint that is demonstrated to be intentionally false may be subject to discipline, up to and including termination.

In addition, Westinghouse strives to provide a workplace that does not tolerate any form of discrimination and is free from offensive behavior and harassment of any type for any reason. Westinghouse further strives for a workplace that is respectful of others and embraces diversity.

The following practices shall be maintained at each Company location to create a climate that will ensure the continuing application of this Policy on a consistent basis:

1. **Communication:** Communicate at least once each year to all employees that harassment (including, but not limited to, sexual harassment) and discrimination is prohibited by Company Policy, that a reporting procedure exists for raising concerns related to harassment and discrimination, and that all such allegations will be promptly investigated and addressed through appropriate and prompt corrective action. The communication should state that an employee need not report the matter to their direct manager.
2. **Complaint and Reporting Procedure**
 - a. Any individual who believes they have been subjected to prohibited harassment, discrimination or retaliation by a co-worker, supervisor, manager, temporary or seasonal worker, agent, client, visitor, vendor, or customer of the Company, or any third party involved in the Company's operations, or who believes another individual has been subject to such conduct, should report it immediately. Applicants and employees are encouraged to report concerns, even if they relate to incidents in the past, involve individuals who are no longer affiliated with the Company, or concern conduct occurring outside of work if it impacts the individual at work.
 - b. Complaints are to be reported to Human Resources and/or management if the employee is comfortable doing so. If an employee prefers to report the matter through an independent channel, they can utilize any part of the Westinghouse Help Chain, including Corporate Management, Legal, Global Compliance, and Internal Audit. Employees can also report all allegations of violations of law, Westinghouse Global Ethics Code, and policies and procedures through the confidential Ethics and Concerns Helpline at 1-844-238-4380 or ethicsandcompliance@westinghouse.com.

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- c. Complaints can be made verbally, or in writing, to Human Resources and/or management in person, via PowerHUB or via email at westinghouse.us@alight.com. Employees are not required to report any prohibited conduct to a supervisor or manager who may be hostile, who has engaged in such conduct, who is a close associate of the person who has engaged in such conduct, or with whom the employee is uncomfortable discussing such matters. Complaints may be made confidentially using the Ethics and Concerns Helpline at 1-844-238-4380, by submitting a web report via www.weccconcerns.com or ethicsandcompliance@westinghouse.com.
 - d. Employees and applicants are encouraged, but not required, to communicate to the offending person that the person's conduct is offensive and unwelcome. Any supervisor or manager who receives a complaint of discrimination, harassment or retaliation must immediately report the allegation to Human Resources.
 - e. All claims/concerns received are to be referred to the appropriate parties for an initial review and guidance concerning the investigation of the complaint. After a report is received, a thorough and objective investigation will be undertaken. Confidentiality will be maintained to the extent practical and permitted by law. Investigations will be conducted as confidentially as possible and related information will only be shared with others on a need-to-know basis. The investigation will be completed, and a determination made. The reporting employee will be informed when the investigation is completed as soon as practical. The Company expects all employees to fully cooperate with any investigation conducted by the Company into a complaint of harassment, discrimination or retaliation, or regarding an alleged violation of any other Company policy.
 - f. Substantiated claims will be dealt with promptly and decisively by the administrator of appropriate corrective action, up to and including termination of employment.
 - g. If a complaint cannot be substantiated, the Company may take appropriate action to reinforce its commitment to providing a work environment free from harassment, discrimination and retaliation.
 - h. Government agencies, including the Equal Employment Opportunity Commission ("EEOC") and equivalent state agencies will accept and investigate charges of unlawful discrimination and harassment at no charge to the complaining party. The nearest office of the EEOC and equivalent state agencies can be found in your local telephone directory or online at www.eeoc.gov.
 - i. See BMS-LGL-92 Ethics & Concerns Reporting and Investigation Policy.
 3. Documents: All complaints will be documented, including contents of meetings, interviews, results of investigations, and all other actions attendant to claims of harassment, discrimination, and retaliation. All related documentation must be maintained, handled, and processed in accordance with the Corporate Privacy Policy, "Protection and Privacy of Personal Data" (BMS-LGL-105), and shall be retained in accordance with the Corporate Personal Data Retention Policy, "Personal Data Record Retention Policy" (BMS-LGL-156). Records may be subject to additional retention requirements dependent on applicable retention laws and regulations.
 4. Discipline: All disciplinary actions will be taken in accordance with applicable Company policies and law.
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4.0 Revision Summary

Revision	Section	Revision Description
0.00		Initial Issue
1.0	All	Updates to all sections
1.1		Change document Owner
2.0	All	Updates to all sections
3.0	All	Update overall policy to align with applicable law, update formatting, update policy references and transfer policy back to Legal as policy owner.