



# Ethics and Concerns Reporting and Investigations Policy

## Approval

### Preparer:

\_\_\_\_\_  
Erin Heath  
Global Compliance Lead

### Owner:

\_\_\_\_\_  
Electronically Approved\*  
Erin Heath  
Global Compliance Lead

### Approver:

\_\_\_\_\_  
Electronically Approved\*  
Yulia Bhonsle  
Director Global Compliance Programs

\*Electronically approved records are authenticated in the Business Management System (BMS).

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#### Policy Statement

Westinghouse is committed to maintaining the highest standards of business conduct and ethics and complying with all applicable government laws, rules and regulations, corporate reporting and disclosure, accounting practices, accounting controls, and auditing practices.

The Ethics and Concerns Reporting and Investigations policy (“Policy”) establishes the principles for individuals to raise concerns regarding actual or potential violations of law, Westinghouse Global Ethics Code and policies, and provides the framework for investigation of these concerns as permitted by law. This Policy covers reporting of violations related to the following matters:

- Bribery and corruption
- Criminal offences
- Discrimination, harassment, or workplace violence
- Environmental, health, or safety threats to individuals, public, or the environment
- Financial reporting issues including accounting, internal controls, and audit issues
- Legal, regulatory and related compliance violations
- Misuse and Misappropriation of Company Assets
- Other suspected violations of law, Westinghouse Global Ethics Code, or policies
- Concealment of any of the above

Some of the above matters may not be available for reporting in your country.

#### Policy Intent

This Policy intends to support our company values by ensuring that employees can raise concerns without fear of retaliation and to provide a transparent and confidential process to investigate concerns. It is also intended to encourage employees to cooperate with Westinghouse in the internal investigation of any matter by providing honest, truthful, and complete information without fear of retaliation.

#### Applicability

This Policy applies to all employees at Westinghouse Electric Company LLC and all subsidiaries and affiliates (collectively “Westinghouse”)<sup>1</sup>.

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<sup>1</sup> Westinghouse means Westinghouse Electric Company LLC, its wholly-owned or controlled subsidiaries and joint ventures, and all organizational units owned, managed by and/or reporting to Westinghouse Electric Company LLC’s senior management worldwide, including all affiliated companies, product lines, regions and center led functions.



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## Implementation

### General principles including No Retaliation

- Reporting via the Ethics and Concerns Helpline is entirely voluntary, and employees will not face any consequences for failing to report a concern via means described in this policy.
- All concerns will be treated timely, thoroughly and objectively.
- All concerns will be investigated, and information will be kept confidential to the extent appropriate and permitted by law.
- Employees, who in good faith seek advice, raise concerns, or report misconduct, provide information or otherwise assist in an investigation, will not be discharged, demoted, suspended, threatened, harassed, intimidated, coerced, or retaliated against in any other manner for raising a concern, even if their concerns are proven unfounded by an investigation (unless the employee knowingly made a false allegation, provided false or misleading information in the course of an investigation, or otherwise acted in bad faith).
- Anyone determined to have retaliated against a reporter will face disciplinary action and may also potentially be subject to civil and criminal liability.
- All instances of retaliation must be reported to Global Ethics and Compliance immediately.

### Confidentiality

This Policy encourages reporters to provide their names in order to assist with investigations into the concerns. The identity of these individuals will be kept confidential, to the extent possible, consistent with the need to conduct an adequate investigation or respond to legal proceedings. Anonymous concerns are accepted when permitted by law. Thorough investigations may be more difficult or not possible if the investigating organization cannot contact the reporter to obtain additional information if needed.

### Reporting Concerns

An independent company based in the United States receives all concerns reported through the Westinghouse Ethics & Concerns Helpline and promptly directs them to Westinghouse's Global Ethics and Compliance organization, also located in the United States, for follow-up. For employees located in the European Union, the transfer of any personal information to the United States in this context is covered by adequate safeguards such as data transfer agreements based on the European Commission's model clauses.

- Concerns can be raised through the Westinghouse Ethics and Concerns website:  
[www.WECCConcerns.com](http://www.WECCConcerns.com)

Or toll-free helpline (in reporter's language) in the following countries:

- **Belgium**

Step 1: Dial 0-800-100-10

Step 2: at the prompt enter 8442384380

- **Brazil** 0-800-000-2808



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- **Canada** 1-844-238-4380
- **China** 400-120-8512
- **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** 0066-3386-8128
- **Mexico** 800-077-0794
- **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
- **United Kingdom**
  - Step 1: Dial 0-800-89-0011
  - Step 2: at the prompt enter 8442384380
- **Ukraine**
  - Step 1: Dial 0-800-502-886
  - Step 2: at the prompt enter 8442384380
- **United States** 1-844-238-4380



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- **Poland** 800-005-088

#### Investigating Concerns

All allegations of violations of law, Westinghouse’s Global Ethics Code, and policies and procedures will be reviewed and investigated as required by law and Westinghouse’s investigations guidelines, within the limits of the matters reportable in your country.

Reporter is not responsible for investigating the alleged violations or for determining fault or corrective measures; appropriate management is charged with these responsibilities. The Global Ethics and Compliance organization assigns the reports to the group best suited to investigate the matter. For reports that should not be reviewed at the local level, the Global Ethics and Compliance organization will conduct the investigation or will select an appropriate independent investigation team. For concerns related to Nuclear Safety Culture, the Employee Concerns organization will investigate.

All investigations will be handled promptly, thoroughly and in a confidential manner. Appropriate corrective actions will be taken, if warranted, by the Company to promptly address issues identified during investigations.

Depending on local law, the subject of a report may be notified of the investigation and have a right to access, correct, or delete any inaccurate or irrelevant information associated with the report.

All parties are required to cooperate with investigations and provide truthful, complete, accurate, and unambiguous responses during interviews. Forgery, alteration or destruction of documents, as well as unauthorized alteration or manipulation of computer files during the investigation is prohibited.

Failure to comply with this Policy may lead to discipline, up to and including termination of employment.

#### Personal Data Processed

The following information may be collected from employees: their names and contact details, any questions they may have, names and titles of all individuals they may be reporting, and a description of any questionable conduct being reported, including all relevant details. Other information collected in the course of the investigation of a concern may also be processed.

Any personal data collected from parties other than Westinghouse employees and its transfer will be treated in accordance with applicable data privacy laws and guidelines.

#### References

- BMS-LGL-16 Global Ethics Code
- BMS-ECP-1 Employee Concerns Program Procedure
- BMS-NSC-1 Maintaining a Positive Nuclear Safety Culture (NSC) and Safety Conscious Work Environment (SCWE) Procedure



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Revision Summary

Revision	Section	Revision Description
0		Initial Issue
1.0	Title	Updated name of the procedure
2.0, 3.0	Reporting Concerns	Updates to Helpline phone numbers
3.1	All	2021 review of entire policy for any needed updates
3.2	References	Update BMS policy number
3.3	Reporting Concerns	Add 2 new Helpline #s (Brazil, Mexico), updated Japan Helpline #.
3.4	Reporting Concerns	Updated Japan Helpline number