INTEGRITY AT OUR CORE

GLOBAL

Ethics Code

SEPTEMBER 2025

Sunita, Alyssa, Sam, Beth, Joe, Frank, Jesse, Chris
Cranberry Township, Pennsylvania, USA

Westinghouse

“The time is **always** right to do what is right.”

—MARTIN LUTHER KING, JR.

A Message from Dan

In today’s complex business environment, the strength of a company lies not only in its products and services, but also in its values. At Westinghouse, our value system is built on a foundation of integrity and trust. Our customers look to us as a trusted partner that operates with integrity.

At the same time, we strive to execute every day with an unwavering commitment to business ethics, which helps guide our decision-making. We care for each other as colleagues and aspire to be team players who work together in a culture of respect, openness and accountability.

As a global organization, it’s important that each of us meets our commitment to uphold these values and principles as we do business with integrity.

Our Global Ethics Code outlines the standards we live by and the systems we have put in place to ensure our company conducts business with the highest standards of ethical conduct.

Doing business with Integrity at Our Core goes beyond adhering to laws and regulations that guide our industry and business operations. It is about fostering a culture where questioning attitudes are encouraged, where we treat others fairly and with respect, and where doing the right thing is always the expectation.

The decisions we make each day – how we treat one another and serve our customers – are reflections of who we are as a company. It is up to each of us to uphold our company values and build a workplace that earns the trust of our customers, our coworkers and our communities.

Respectfully,

Dan Sumner
Interim Chief Executive Officer

Contents

A Message from Dan 3

Integrity at Our Core 6
Global Compliance Program 7

My Code 8
Make the Right Choice 10
Respect Others 11
Honor Our Customers and Suppliers 12
Avoid Bribery and Corruption 14
Fair Competition 16
Participate in the Political Process in Compliance with all Regulations 17
Ensure Appropriateness of Charitable Contributions 17
Act Responsibly when Giving or Receiving Gifts, Hospitalities, and Travel 18
Act in the Best Interest of the Company 19
Trade Lawfully 20
Be Accurate and Transparent 23
Maintain Confidentiality, Protect Proprietary Information, Intellectual Property and Personal Data 24
Westinghouse's Commitment to Quality, the Environment, Health, and Safety 26
Make a Difference 29

Live the Code — Seek Help and Speak Up 30

Index 33
Definitions 34
Global Policies and Procedures 38

Integrity at Our Core

Workplace integrity entails more than simply following laws, the Westinghouse Global Ethics Code, and policies and procedures. Integrity requires a strong commitment to treating others with respect and dealing with those inside and outside of Westinghouse honestly and fairly.

Creating and maintaining a culture of integrity is fundamental to the future success of Westinghouse.

The power of Westinghouse, the power of **Integrity at Our Core**, comes from within each and every employee of this company.

It is our choice each and every day to do what is right.

This is our Code.

Global Compliance Program

Westinghouse has an independent **Compliance Program** under the direction of the Vice President and Chief Compliance Officer. The Global Compliance organization consists of Ethics, Trade, Data Privacy, Nuclear Safeguards, and Data Management programs built to promote ethical decision making and prevent and detect unethical behavior.

- The **Ethics and Compliance Program** ensures adherence to laws and regulations related to anti-trust, anti-bribery and corruption, whistleblowing statutes, and is broken into several different subject areas: Gifts and Hospitalities, Charitable Contributions, Intermediaries, Political Donations, Reporting and Internal Investigations, Conflicts of Interest, Joint Ventures Compliance Program, and a Global Ambassadors Network.
- The **Trade Compliance Program** ensures adherence to laws and regulations related to sanctions and controlling the export and import of goods, software and technology across all borders and is broken into several different subject areas: export controls, import compliance, embargoes and sanctions, and anti-boycott laws and regulations.
- The **Global Nuclear Safeguards Program** ensures compliance with IAEA and country-specific nuclear material and activity requirements.
- The **Data Privacy Program** ensures adherence to laws and regulations governing the protection and processing of personal data.
- The **Data Management Program** enhances collaboration and enables compliance through monitoring and applying necessary restrictions to controlled data flows by creating a global data taxonomy and digitally classifying documents, data and people.

While having a strong Compliance Program is important for our success, compliance is the responsibility of every Westinghouse employee. The Global Compliance organization collaborates with the Business Units and Global Functions including Human Resources, Finance, Internal Audit, Global Supply Chain, Global Employee Concerns Program, Security and others to maintain an effective compliance program. Our Global Compliance Ambassadors Network is designed to help answer Ethics, Trade, and Data Privacy related questions in your organizations. This Global Ethics Code is a key element of our Global Compliance Program and sets the written standards of ethical behavior for all Westinghouse employees, contractors and business partners.

Global Compliance Program

- Ongoing compliance risk assessment of new laws and regulatory guidance
- Commitment to doing business legally and ethically
- Confidential process to raise, investigate and address concerns
- Guidance on ethics, data privacy, trade, nuclear safeguards, and other compliance issues
- Required risk-based compliance training
- ZERO tolerance for retaliation when raising concerns

Your Help Chain

Questions or concerns related to ethics and compliance should be addressed through the Westinghouse Help Chain by contacting any one of the following:

- Your manager or any member of the management team
- Human Resources by requesting support through the PowerHUB HR Help Center
- Global Compliance organization at ethicsandcompliance@westinghouse.com
- Confidential Global Ethics and Concerns Helpline
- Confidential Global Ethics and Concerns online reporting site at www.wecconcerns.com
- Employee Concerns Program (ECP)
- Legal
- Internal Audit
- Global Compliance Ambassadors

My Code

Why do we have a Global Ethics Code?

Our Global Ethics Code is a guide to everyday work decision making and is built on our corporate values along with a simple commitment: always conduct business with ***Integrity at Our Core***. If you observe wrongdoing or ethical misconduct, these are violations of our Code and you have a responsibility to report them through the Westinghouse Help Chain. Everyone who is assigned required training on the Code or related compliance topics must complete the training in a timely manner.

When do I need to use the Code?

- To gain understanding of the key risk areas in ethics and compliance
- As a resource when faced with an ethical dilemma
- To find information about the Westinghouse Help Chain

Who does the Code apply to?

Our Code applies to every employee of Westinghouse, its wholly-owned or controlled affiliates, subsidiaries, and Joint Ventures. The Code 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 our Code. We expect our partners, subcontractors, and suppliers worldwide to be guided by these principles as well. We work with customers and business partners who share our values and standards of conduct.

All acquisitions adopt Westinghouse's Global Ethics Code and are timely and orderly integrated into existing Global Compliance Program structure and internal controls.

How do I use the Code?

If you have questions about the appropriateness of a particular decision or conduct, review the Table of Contents to identify the section that most likely applies to your issue. Each section contains a summary of the relevant Westinghouse policy, examples of expected behaviors, practical Q&A format, and information on where to find further guidance, or how to report violations. For example:

- You need to engage services of a customs broker (customer brokers, as well as all other third parties acting on Westinghouse's behalf are considered intermediaries). What is the process to engage an intermediary? Go to "Avoid Bribery and Corruption."
- You are offered to perform consulting work for a Westinghouse customer outside of your formal Westinghouse role. Can you take this second job? Go to "Act in the Best Interests of the Company."
- You were asked to engage in a discussion where sensitive information related to Westinghouse business partners such as pricing strategy will be discussed. Are you allowed to do this? Go to the "Fair Competition" page.

Code waivers

Any waiver of this Code must be approved by the Vice President and Chief Compliance Officer, Executive Vice President and Chief Legal Officer, and the Audit Committee Chair of the Board of Directors.

Upholding our Code

Compliance with our Global Ethics Code is mandatory for all employees. We must follow all relevant laws, regulations, and government policies. Our ethical obligations require that we maintain a questioning attitude as is inherent in the nuclear safety culture.

Importantly, each of us ***must report all violations*** of the Code using the Help Chain. These include, but are not limited to, violations of law, anti-trust issues, bribery, financial fraud, falsification of records, harassment, breaches of personal data, or trade compliance issues.

We must all adhere to the law, the Global Ethics Code, and policies and procedures. Violations of these governing principles can have serious 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.

What should I do if I still have questions after consulting the Code?

Further resources are available for employees. Consider talking with your manager, supervisor, or your Compliance Ambassador. You can also contact Global Compliance or the Ethics and Concerns Helpline.

Employee Responsibilities

- Understand and uphold the Global Ethics Code
- Demonstrate commitment to Westinghouse values and culture by doing business with the highest integrity
- Know and follow relevant laws and regulations
- Speak up—report all violations of the Code using the Help Chain
- Cooperate and be truthful during internal investigations

Leader Responsibilities

All of the employee responsibilities, plus:

- Ensure your employees follow the Westinghouse Global Ethics Code
- Ensure those who report to you receive the training and information necessary to perform their work in accordance with our Code
- Encourage open communication, feedback, and discussions
- Be available for employees to ask questions and raise concerns
- Recognize and reward ethical behaviors
- Take all concerns seriously and follow-up promptly

Make the Right Choice

Making the right choice is part of working at Westinghouse. Our Code does not address every possible law we must follow or every ethical situation we may encounter, but it sets expectations of ethical conduct globally for all employees and provides the framework for making ethical decisions. Use the questions below to guide you in making the right choice.

If you are not sure or answer "no" to any of the questions below, seek guidance immediately through the Westinghouse Help Chain:

- Your manager or any member of the management team
- Human Resources by requesting support through the PowerHUB HR Help Center
- Global Compliance organization at ethicsandcompliance@westinghouse.com
- Confidential Global Ethics and Concerns Helpline
- Confidential Global Ethics and Concerns online reporting site at www.wecconcerns.com
- Employee Concerns Program (ECP)
- Legal
- Internal Audit
- Global Compliance Ambassadors

Q If I encounter a situation where a business partner (customer, supplier, JV partner employees) is behaving inappropriately, do I have to report it? And if so, do I have to contact the Ethics and Concerns Helpline, or can I address the issue with my supervisor or Human Resources?

A Yes, all concerns related to potential violations of law or our Code need to be reported regardless of who is potentially implicated. All concerns related to potential misconduct by both Westinghouse employees and business partners need to be reported. The Ethics and Concerns Helpline is just one of several avenues available to you to ask questions and raise concerns. Discuss the issue with your supervisor or Human Resources, but if you do not feel comfortable doing so, escalate your concerns through another avenue in the Westinghouse Help Chain — contact other members of management, Global Compliance organization, Legal, Internal Audit, Global Employee Concerns Program, or your Compliance Ambassador. If your concerns remain unresolved, you can contact the Global Ethics and Concerns Helpline.

Am I Making the Right Choice?

If the answer is **YES** to all of these questions you can move forward.

If the answer is **NO** to any of these questions, the action is likely inappropriate and you should not move forward without seeking additional guidance through the Help Chain.

Respect Others

Diversity, Nondiscrimination, and Equal Employment Opportunities

We comply with all applicable laws and regulations concerning equal opportunity and nondiscrimination. We do not tolerate any form of discrimination. Embracing diversity in our workforce gives us a competitive advantage, enables us to make more informed business decisions, and helps us better service our diverse global customer base.

Commitment to Nondiscrimination and a Harassment-Free Work Environment

We strive to provide a work environment free from discrimination, offensive behavior and harassment of any type and for any reason. We conduct our operations consistent with the spirit and intent of the United Nations Universal Declaration of Human Rights and other applicable international initiatives.

We will not tolerate inappropriate behavior, including:

- Hostile, offensive, or humiliating behavior
- Unwanted physical contact
- Sexual harassment
- Harassment or discrimination based on religious or political beliefs or lack thereof
- Harassment or discrimination based on age, color, race, ethnic origin, sex, gender identity/expression, sexual orientation, disability status, genetic information; protected veteran status, citizenship status, or any other characteristics including those protected by law
- Retaliation for participation in any protected activity

We strive to create an environment where we encourage differences of opinion, free from fear of discrimination or retaliation, where all employees can openly ask questions or raise concerns.

For more information, refer to **BMS-LGL-5 — Nondiscrimination and Anti-Harassment Policy**; **BMS-LGL-6 — Equal Employment Opportunity**.

Q I am working on a company assignment in a country where certain ethnic groups are not protected by local labor laws from discrimination and unfair treatment. What does this mean in terms of how we treat employees in this country?

A Westinghouse will not tolerate discrimination or harassment of any kind in the workplace, regardless of whether country-specific laws do not provide local legal protection for certain ethnic groups. All employees must be treated fairly and with respect.

Honor our Customers and Suppliers

Our customers and suppliers are integral to achieving Westinghouse's vision as the global nuclear energy industry's first choice for safe, cost-effective, and secure solutions. We must treat our customers and suppliers ethically, respectfully, and fairly while delivering what we promise.

Customers

Our customer agreements should always be in writing and conform to our policies and applicable laws. When dealing with our customers, we always:

- Earn their business based on our superior products, customer service, and competitive prices
- Present our services and products in an honest and forthright manner
- Consistently deliver on our commitments while ensuring a strong nuclear safety culture
- Avoid unfair or deceptive trade practices
- Focus on high quality customer service
- Follow customer site requirements, policies, and procedures

Hopkins, South Carolina, USA

Q I am responsible for selecting a new supplier of services for my department. My brother-in-law works at a company that provides a solution that may work for Westinghouse. I know their company has a great reputation and provides services at very competitive prices. How should I go about engaging them?

A Your responsibility is to ensure that the Westinghouse Global Ethics Code as well as all other applicable policies are followed when a new supplier is being selected. Since you have a relative working for a potential supplier, you will need to disclose the relationship to your manager and Supply Chain and most likely will need to remove yourself from the selection and supplier management process if they are awarded the contract. For all new supplier selections, appropriate policies will need to be followed. Supply Chain needs to be engaged from the very beginning. A formal request for quotation may be needed. The contract may need to be bid to ensure the best value proposition for Westinghouse. If a single or sole source supplier selection is proposed, appropriate approvals will need to be obtained in accordance with Supply Chain policies.

Suppliers

We hold our suppliers to the same standards of integrity to which we hold ourselves and which our customers require. All suppliers must comply with our Westinghouse **Supplier Code of Conduct** and applicable customer site requirements, policies, and procedures.

We treat suppliers how we would want to be treated. When interacting with suppliers, we should always:

- Seek the best value proposition for the company
- Ensure all relationships with suppliers are free from conflicts of interest
- Keep supplier pricing confidential
- Report situations where suppliers are not compliant with the standards required by our customers.

We do not do business with suppliers that violate our standards, provide unsafe products or services, or are otherwise not compliant with the law. This includes ensuring compliance with country-specific laws on human rights and anti-slavery, such as the UK Modern Slavery Act and global initiatives such as the United Nations Convention on Human Rights.

Avoid Bribery and Corruption

Westinghouse has a ZERO tolerance policy for engaging in any form of bribery or corruption, especially with public officials, which includes personnel working for total or partially government-owned companies, such as the employee of a state-owned public utility. This is crucial when maintaining adequate relationships with our colleagues, clients, and others we do business with. You must never offer, pay, request, or accept a bribe — including facilitating payments on behalf of or directly through third parties. The perception of corruption or bribery alone can be very damaging to our organization's reputation. Bribery and corruption take many forms and can be disguised through illicit business practices to gain or retain a business advantage. We compete fairly for our business opportunities. It is important that you understand and follow the Westinghouse anti-corruption policies as well as appropriate regulatory requirements and laws when conducting business in countries around the globe. Some of the most prominent laws are the U.S. Foreign Corrupt Practices Act (FCPA), the UK Bribery Act of 2010, as well as other international anti-corruption laws such as the OECD Convention on Combating Corruption of Foreign Public Officials, among others. Westinghouse's policies and procedures ensure compliance with all of these laws.

Employees must promptly and proactively report known or suspected bribery and corruption to our Global Compliance organization. Westinghouse prohibits retaliation against anyone who raises an allegation. Violations of our Global Ethics Code and policies, including the Westinghouse anti-corruption policy and respective laws, can have serious 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 you need help understanding how to comply with these laws or would like to report suspicious activity, please contact Westinghouse's Global Compliance Organization.

We must uphold the highest ethical standards while continuing to protect our brand and reputation, and we expect our business partners to share in our principles. We will not engage in doing business with third parties who do not maintain effective anti-corruption compliance policies and procedures. We will continue to ensure that our business partners follow our organization's anti-corruption policy and procedures.

The following paragraphs contain information on basic forms of bribery and corruption:

Bribery Schemes Using Intermediaries: Both direct and indirect bribery is prohibited. Indirect bribery is bribery committed on Westinghouse's behalf by a business partner, often referred to as an intermediary or other type of partner. This is any third party who represents Westinghouse, acts on its behalf for the purpose of selling Westinghouse products or services, or acts jointly with Westinghouse for the purpose of obtaining, retaining, or directing business, or assisting with the other regulatory requirements, such as clearing customs or obtaining permits for Westinghouse. A more comprehensive list of these types of business partners is included in Global Intermediary Procedure (BMS-LGL-66). All new intermediary relationships require approval by Westinghouse Legal and Global Compliance organizations.

Bribery Schemes Using Conduit Companies Such as Non-Profit Organizations: Westinghouse prohibits the use of conduit companies, such non-profits or charitable entities, to provide donations, other contributions in kind, or anything else of value on Westinghouse's behalf. The Global Procedure on Charitable Donations must be followed to ensure all contributions to charitable entities, sponsorships and other non-profits are properly approved by the Global Communications and Global Compliance organizations.

Facilitating Payments: Westinghouse prohibits facilitating payments or grease payments. These are small payments made to public officials to encourage them to perform actions they are already required to perform more quickly. If you are ever requested to pay something other than a publicly listed fee for service, contact Legal and Global Compliance before making the payment.

Employment: An offer of employment to a public official, an immediate family member thereof, or a similar individual who may have the ability to improperly favor Westinghouse, may be viewed as a bribe. For this reason, prior to hiring or engaging public officials, their immediate family members, or individuals with known close relationships with public officials, prior approval from the Legal and the Global Compliance organization is required.

For more information, refer to our **BMS-LGL-11 — Anti-Bribery and Corruption Policy**, **BMS-LGL-66 — Global Intermediary Procedure, BMS-COM-5 — Global Procedure on Charitable Donations & Volunteerism**, and **BMS-LGL-100 — Global Policy on Mergers and Acquisitions**

For more information on the Anti-Bribery Program, go to the **Anti-Bribery and Corruption Program** page on george, and for information on the warning signs of bribery, see the document titled **"Bribery Red Flags"**.

Q A manager working for our customer wants to tour one of our facilities in France. They are paying for their flights and hotel accommodation but asked if we could provide administrative support to help arrange the trip, provide transportation and cover meals locally. Can Westinghouse support the trip, pay for transportation, and also provide hospitalities, such as meals, while they are on-site?

A You can support the visits of customers, but only if fully approved in advance by the Global Compliance organization. It is a permissible business purpose to promote and demonstrate our products and technology to customers in compliance with our corporate policies, applicable laws, and government, customer, or supplier policies. You should contact Global Compliance with any questions regarding these types of travel arrangements for guidance in advance. All payments need to be made directly by the customer to respective vendors.

What is a bribe?

A bribe is offering, giving, requesting, or promising to give anything of value (irrespective of the amount) with the intent to improperly influence business decisions or create or obtain an unfair business advantage. Given the circumstances, intent may be implied, even if not expressed. Bribes may be:

- Cash, cash equivalents (such as gift cards), and/or loans
- Lavish gifts, hospitality, travel, and entertainment
- Discounts for products and services
- Offers of employment outside the normal hiring process
- Other favors, either business-related or personal
- Agreements with public officials that are outside the normal course of business
- Charitable or political contributions outside of the organization's guidelines
- Anything of personal value to the recipient

Prevent Money Laundering

We comply with money laundering laws everywhere we do business. We ensure our operations are conducted in a way that our employees, facilities, products, and services are used only for legitimate purposes and in compliance with Westinghouse policies and procedures, and all anti-money laundering laws, rules, and regulations.

We also ensure that we are not complicit in the money laundering schemes of other parties. To prevent money laundering, we should be alert to money laundering red flags when interacting with customers and other business partners.

Some money laundering red flags include:

- Orders or purchases that are unusual given the customer's line of work
- Untraceable payments to or from unknown accounts
- Requests for additional payments to unnamed third parties
- Novel deal structures designed to avoid taxes
- Requests to pay in cash or discount offers for paying in cash
- Requests for cash refunds

Fair Competition

We welcome open, transparent, and fair competition. Westinghouse is successful because of the quality of our products and services, not due to unfair or illegal practices. Competition laws can be very complex, and failure to follow them can lead to serious consequences for individuals and Westinghouse. Westinghouse is committed to observing the applicable competition and antitrust laws of all countries in which it operates. Violations of competition and antitrust laws may result in severe penalties, including large fines and jail terms. Compliance with these laws is required at all times.

Violations of Competition Laws

Competition laws require every company to act independently when making decisions on competitively sensitive factors, such as price, geographic markets, and contract terms. It is a violation of Competition law to:

- Fix or control prices, either by agreeing directly with a competitor, or by any other method
- Structure bids to direct a contract to a certain competitor or reseller (bid rigging)
- Boycott certain customers or suppliers
- Share information with competitors about prices, costs, or profit margins
- Divide or allocate markets, territories, or customers
- Limit the production or sale of products
- Exchange or share unpublished information with a competitor
- Agree to reciprocal deals with partners or suppliers

Competitors May Also be Suppliers, Customers, and Partners

In the energy industry, it is possible for our relationships with partners or customers to be impacted by competition laws, depending on the circumstances. We must be careful to not intentionally or accidentally share or discuss information with anyone that could lead to unfair competition or that would compromise our confidential business practices or proprietary information. Contact the Westinghouse Legal and Compliance organization if you have any questions regarding compliance with competition laws.

For more information, refer to our **BMS-LGL-34 — Competition Anti-Trust Law Compliance Policy** and local in-country policies.

Q Last month I attended a nuclear professionals sales conference in Switzerland. I was having a discussion with a fellow sales representative from a Korean nuclear technology vendor. She told me they are having a hard time selling certain products in the American market and asked me about our price point on similar Westinghouse-branded products. I told her I was not at liberty to discuss pricing. I was not sure if I should report this to legal. I thought there may be an anti-trust issue, but since the interaction occurred abroad and I was speaking with a foreign national I was unsure if U.S. anti-trust law would apply. Should I report the issue?

A Yes, you should report the conversation to Westinghouse Legal or Global Compliance. Westinghouse policy prohibits the disclosure of pricing, cost, and profit-margin information with competitors. Furthermore, U.S. anti-trust laws apply even though the conversation occurred outside its borders and with a foreign national. U.S. anti-trust laws apply any time anti-competitive conduct affects the U.S. market. So, even though the anti-competitive conduct occurred in Switzerland during a conversation with a Korean national, U.S. competition law still applies, and you should report the issue to Westinghouse Legal and Global Compliance as soon as possible.

Insider Trading

Insider trading occurs when someone uses confidential information to make a decision about buying or selling shares or other financial securities. Westinghouse's owners are publicly traded companies. Strict adherence to applicable securities laws and associated regulations is required by all Westinghouse personnel. Employees are strictly prohibited from engaging in insider trading, and must ensure fairness, transparency, and integrity in all financial dealings. Employees must not buy or sell stocks or other securities based on material non-public information obtained through your work at Westinghouse. Additionally, employees should not share information which is non-public with others, including family or friends, who may use such information to trade in securities. Suspected breaches of the securities laws must be reported to the Westinghouse Legal and Global Compliance organizations.

Participate in the Political Process in Compliance with all Regulations

Contacts with Government Representatives

Employees are encouraged to support the political process through personal contributions or by volunteering their personal time to the candidates or organizations of their choice. The following rules should be observed:

- If you participate in the political process, you must do so as a private citizen, not as a representative of the Company unless authorized.
- You may not work on a political fundraiser or pursue other campaign activities while at work or use the Company property or resources for political purposes.
- No Westinghouse employee may require you to contribute to, support or oppose any political group or candidate.
- If you need help understanding how to comply with this policy or would like to report suspicious activity, please contact Westinghouse's Global Compliance Organization.
- Any violation of this policy should be reported through the Westinghouse Help Chain.

In the event you are solicited for or intend to make a political donation to a foreign candidate or campaign, you must consult and comply with the Global Procedure on Political Contributions.

Additionally, Company employees must promptly consult with the Westinghouse Government and International Affairs office on issues involving the U.S. Government. Accordingly, employees who intend to meet with government representatives when on Company business, whether in the U.S. or abroad (i.e. U.S. embassy representatives abroad), shall notify the Government and International Affairs Office prior to such a meeting.

Lobbying Activities

All lobbying activities Westinghouse engages in will be done with commitment to transparency, accountability, and adherence to applicable laws and regulations. Lobbying includes any attempts to influence the decisions of government officials or legislators on behalf of the Company. All lobbying activities at Westinghouse will be overseen by Corporate and Government Affairs. Lobbying firms are intermediaries and require approval by Westinghouse Global Compliance and Government Affairs in accordance with BMS-LGL-66 Global Intermediary Procedure.

Q My local non-profit organization is organizing a walk to raise funds to fight cancer. It would be great if Westinghouse sponsored a group of employees to participate. How should I go about organizing this?

A You should obtain approvals prescribed in the Global Procedure on Charitable Donations and Volunteerism. Going through the adequate procedures ensures that Westinghouse can actively engage in charitable activities without exposing the company to unexpected legal or reputational risks.

For more information, refer to **BMS-COM-5 — Global Procedure on Charitable Donations and Volunteerism** and **BMS-LGL-101 — Global Procedure on Political Contributions**.

Ensure Appropriateness of Charitable Contributions

Employees are encouraged to be active in their communities, including by making charitable contributions at their own personal choice and by volunteering their time. These activities should generally be conducted outside of work, using your own time and resources and through your personal email, unless you are supporting specific Westinghouse-sponsored charitable programs.

Any charitable contributions, or contributions to similar not-for-profit organizations on behalf of the company require prior approval. If you receive a request for a charitable contribution or intend to make a charitable contribution on behalf of the Company, please refer to BMS-COM-5 Global Procedure on Charitable Donations and Volunteerism to obtain appropriate pre-approvals. Charitable donations should only be made directly to approved recipients. In some instances, charitable contributions may present a potential risk of corruption, particularly in certain countries.

Act Responsibly when Giving or Receiving Gifts, Hospitalities, and Travel

Providing or accepting modest gifts, hospitalities, travel and entertainment is part of doing business globally. It can also create a positive work atmosphere between our organization, employees, and our business partners. However, if done lavishly or frequently, it can create the appearance that business decisions are made unfairly and could be viewed as bribery. If you are giving or receiving gifts, hospitalities, travel, or entertainment, it is your responsibility to ensure that you comply with BMS-LGL-22 Global Policy on Gifts, Hospitality and Travel, and relevant country-specific laws, and obtain any required pre-approvals justifying its business purpose. This protects Westinghouse and you by ensuring that the gifts, hospitalities, travel, and entertainment given to third parties are permissible under applicable laws. It is also important to remain aware of cultural differences and business practices which vary substantially across different cultures, traditions, and norms.

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. Review the BMS-LGL-22 Global Policy on Gifts, Hospitality, and Travel (GHT) before giving or receiving a receiving any gifts. ***Cash or cash equivalents (such as gift cards) are never permitted.*** There must be a legitimate business purpose for each GHT receipt.

Westinghouse's or guests' relatives are only permitted in case of jointly family-oriented events for which there is a legitimate business purpose.

If accepting a gift or hospitality does not feel right, refuse it and consult with your manager or the Global Compliance organization about the situation before accepting or giving a gift. If you need help understanding how to comply with this policy or would like to report suspicious activity, please contact Westinghouse's Global Compliance Organization.

Permissible hospitality, which includes meals and entertainment include activities that are:

- Legal under the laws of the country in which it is provided
- Permissible under Westinghouse policy
- Permissible under the internal policies of the recipient
- Reasonable and modest in value within your region
- Not designed to influence judgment or be perceived as a favor to retain services
- Not conducted with a public official
- Not imposing a sense of obligation on the recipient
- Reported or approved in accordance with Westinghouse policy

For more information, refer to **BMS-LGL-22 — Global Policy on Gifts, Hospitality and Travel**.

Q A supplier offered me a gift card to a local steakhouse. Can I accept?

A No. Westinghouse employees are not permitted to accept cash or cash equivalents. If the supplier offers to pay for a meal and no cash is exchanged, so long as it is not extravagant, it is likely permissible. You should check with Global Compliance before accepting the meal in-kind.

Q One of our suppliers invited us to a golf outing. The supplier offered to pay all expenses for travel, meals, and lodging. Can I accept the offer?

A Maybe, but you need to consult Legal and Global Compliance first. All travel requires pre-approval by the Compliance organization. Compliance would need to examine the value of the goods and services provided to determine the risk of accepting the trip.

Q Recently at a trade show I won a raffle for two baseball tickets. Can I accept these?

A Yes. You may keep items obtained at a trade show or other business-related gathering so long as they were awarded through a process in which they were generally available and not targeted at any one individual.

Act in the Best Interest of the Company

Conflicts of interest occur when an employee's outside activities, personal financial interests, or other personal interests influence or appear to influence decisions that affect Westinghouse.

We should always act in the best interest of Westinghouse. This means:

- Avoid actions that create a conflict of interest or even the appearance of a conflict of interest; and
- Comply with the Personal Conflicts of Interest Policy.

All employees should disclose actual or potential conflicts of interest to their manager, a Human Resources Business Partner or Global Compliance at **coi@westinghouse.com.**

Conflict of Interest

Having a conflict of interest is not always a violation of our Code, but ***failure to disclose*** actual or potential conflicts of interest does violate the Code. Below are some examples of conflicts of interest:

- Doing business with close friends or family members
- Taking a second job that competes with Westinghouse
- Managing your own business such that it interferes with your Westinghouse role
- Working for close friends or family members, or having them work for you
- Having direct or indirect significant financial interest in one of our competitors, suppliers, customers, or other third parties with whom we do business
- Diverting a business opportunity from Westinghouse to another company; and
- Serving on the Board of Directors of certain for-profit businesses

For more information, refer to **BMS-LGL-24 — Personal Conflicts of Interest Policy** and local in-country policies.

Westinghouse Women in Nuclear Group
Cranberry Township, Pennsylvania, USA

Q Can I do work for a Westinghouse customer on my own time? I just want to save the customer money and the customer would receive the same quality of service as if Westinghouse provided the service.

A No. This is a direct conflict of interest. You are using your knowledge of a Westinghouse customer and that customer's needs to create extra income for yourself. You may also be directly competing against the Company by taking a potential Westinghouse business opportunity.

Q I was asked to be on a for-profit Board of Directors of an outside organization. Is it a conflict?

A Although this would not always constitute a conflict, employees should be careful about the circumstances. Conflicts of interest are more likely when the outside organization is a competitor, supplier, or customer, or has some other existing relationship with Westinghouse. In all cases, you must discuss potential service on any not-for-profit or for-profit Board with the Global Compliance organization before accepting a directorship.

Trade Lawfully

The Global Trade Compliance Program at Westinghouse ensures adherence to laws and regulations related to sanctions and controlling the export and import of goods, software, and technology across all borders. Our employees must comply with the Global Trade Compliance Company Policy and regional and local policies and laws in countries where we do business. Trade Compliance can be broken into several different subject areas, as follows:

Export Controls

Employees are required to comply with export control laws and regulations in all countries in which we do business. As U.S. export control laws apply to exported U.S. goods and technology beyond their initial export, all Westinghouse sites globally must comply with both local and applicable U.S. export regulations.

Import Compliance

Westinghouse complies with import laws and regulations in all countries in which we do business, including classification, valuation, and marking requirements. Preferential duty savings programs are utilized to maximize cost savings for our business and our customers.

Embargoes and Sanctions

At any time, a region or country may decide to restrict trade with certain countries, entities, or individuals. The penalties for violating these restrictions can be very serious. Westinghouse complies with all legally mandated embargoes and sanctions.

Anti-Boycott Laws and Regulations

Westinghouse and its non-US subsidiaries, offices, and affiliates shall not participate in any economic boycott that is contrary to U.S. anti-boycott laws. Westinghouse reports any such requests to the U.S. government, as required by law.

Report Non-Compliant Transactions

Contact Global Trade Compliance to seek guidance or report non-compliant trade practices such as:

- There is an actual or potential inadvertent release or misuse of Westinghouse technology.
- The customer or purchasing agent is reluctant to offer information about the end-user.
- A freight forwarder is listed as the end-user.
- Stated end-use is inconsistent with product specifications.
- The transaction involves cash or cash equivalents.

For more information, refer to **BMS-LGL-73 — Global Trade Compliance Company Policy, BMS-LGL-141 Global Sanctions Policy,** and regional and local in-country policies.

Q I am a sales engineer working with a new customer. They are interested in purchasing instrumentation and control parts, but we do not have any export licenses to support this contract. How do I ensure I can deliver to my prospective customer in compliance with export laws and regulations?

A Check with the Global Trade Compliance Team before signing contracts with new customers. U.S. and other countries' export control and sanctions laws and regulations may apply, potentially resulting in restrictions based on customer ownership or military end uses. We need to ensure that Westinghouse can fulfill the contract prior to making a contractual commitment.

Q I am negotiating a contract with a customer from a Middle Eastern country and was asked to supply information about Westinghouse's associations with Israel. Can I comply with this request?

A This is a potential problem, and depending on other facts, it may be illegal for the Company to supply such information due to U.S. anti-boycott laws. You should check with the Global Trade Compliance group before proceeding.

Q I am an Engineering Manager in the U.S. working on a steam generator replacement project and need to utilize Westinghouse engineers in multiple countries to be able to deliver on time for our customer. I know I can share nuclear technology without specific export licenses to Canada and our locations in EMEA. Can engineers in those countries share nuclear technology with each other and back to the U.S. without specific export licenses?

A All locations outside of the U.S. require specific export licenses to transfer nuclear technology. While Westinghouse has many export licenses from non-U.S. countries, they may be scoped for specific projects. Situations like this must be reviewed on a case-by- case basis by the Global Trade Compliance Team.

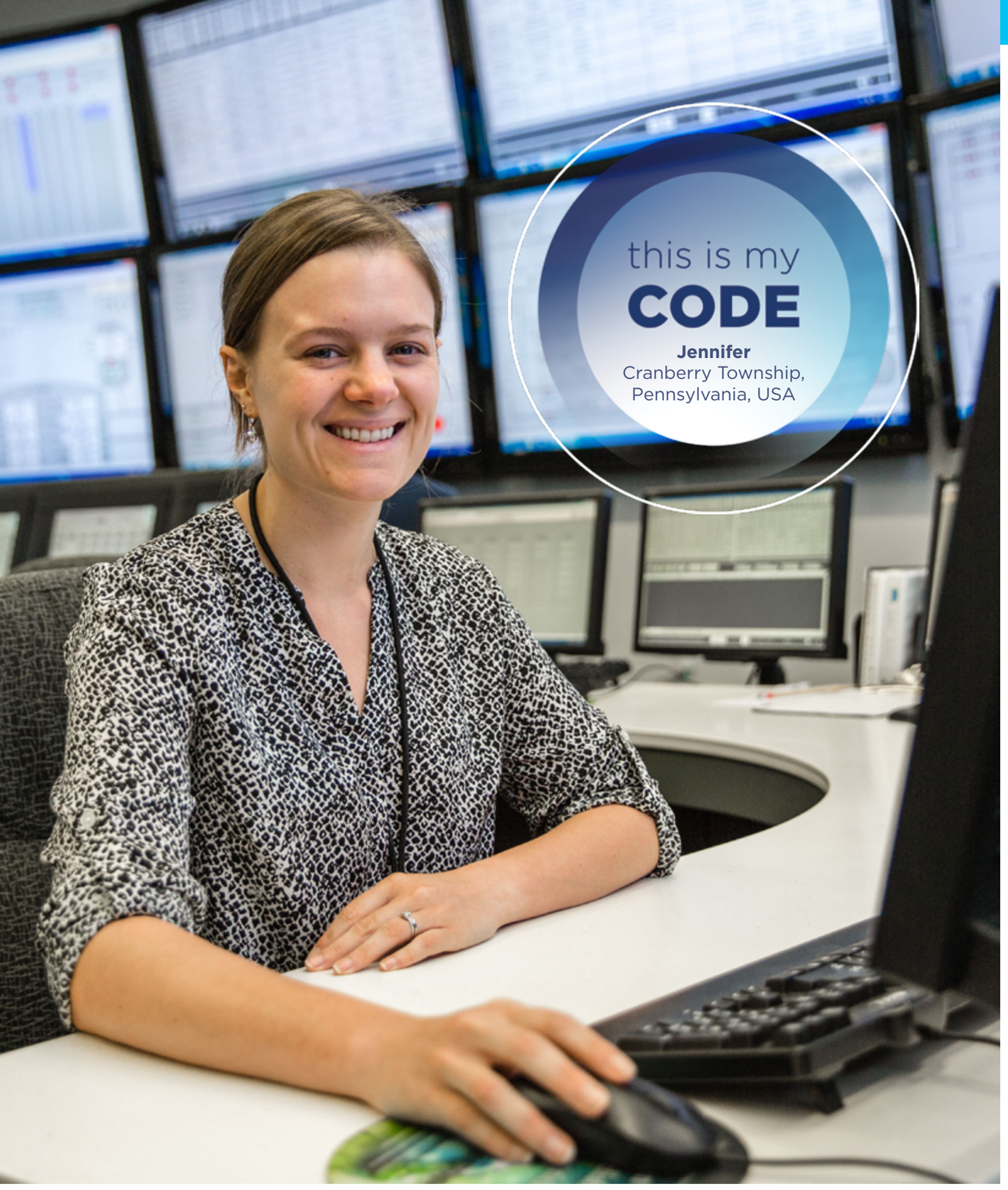
Q I am a sourcing manager in France and have identified a potential supplier that has a U.S. sanctioned party as their beneficial owner. The beneficial owner is sanctioned by the US, but not by France. As there will be no U.S. involvement in this transaction, do I have to worry about U.S. sanctions?

A Yes. All Westinghouse locations globally must comply with U.S. sanctions requirements, in addition to local export laws. Contact the Global Trade Compliance group for guidance as needed.

Q I have been contacted by a defense contractor that wants to use some of Westinghouse's nuclear technology for military purposes. Are there any special precautions I need to take when engaging with a defense contractor, even when they're just talking about nuclear technology?

A Yes, there are special precautions you must take when engaging with a defense contractor. The first step is engaging the Global Trade Compliance Team before proceeding. When we begin to modify any of our regular work for military end use, we are stepping into more restrictive trade regulations that require additional measures.

Sanmen AP1000® Plant, China



Be Accurate and Transparent

We have ZERO tolerance to any type of fraud. We must be accurate and transparent in the way we conduct business and record business transactions at Westinghouse. We must also apply the highest ethical standards in our financial and non-financial reporting.

This means:

- Ensuring only appropriate individuals have the ability to process financial transactions
- Ensuring all financial transactions are properly authorized, complete, and accurate
- Meeting all accounting, financial, tax and other relevant regulatory requirements, including adherence to Sarbanes-Oxley standards, in countries where we operate
- Ensuring accurate and transparent financial reporting
- Ensuring accurate reporting on project actual status, actual costs, and up-to-date schedules
- Ensuring timely processing of any necessary changes to project financial data (ICNs/CCNs)
- Ensuring Estimated Costs to Complete reflect the most current (known) conditions
- Ensuring project schedules include the complete scope remaining in the project (inclusive of vendor/supplier information) and reflect the achievable activity durations
- Completing accurate product quality inspection and testing logs
- Transparently reporting on environmental, quality, and safety
- Ensuring all outside presentations and responses to inquiries about Westinghouse are complete, fair, accurate, timely, and understandable

We must **not**:

- Misrepresent or falsify financial accounts, records, or reports
- Maintain off-the-book accounts to facilitate questionable or illegal payments
- Falsify non-financial records, such as product quality testing results
- Evade taxes or facilitate tax evasion by other parties
- Manipulate, coerce, or mislead employees, auditors, and business partners for the purpose of making misleading entries in our financial statements

If you believe you are being asked to use questionable accounting techniques, falsify information, or make any inaccurate entries in our books and records, or if you are aware that others are doing so, you should immediately escalate your concern through the Westinghouse Help Chain.

For more information, refer to **BMS-FIN-12 — Financial Policy Governance — Appendix A: Global Financial Policies** and local in-country policies.

Q I have seen instances in which project status reporting of cost and schedule do not seem to accurately reflect the actual performance on the project. What should I do?

A If you are comfortable doing so, discuss the situation with your supervisor. You can also speak with a higher-level manager in your organization or use another Help Chain avenue if your concerns are not addressed. If inaccurate reporting of project financials took place, it is a serious violation of our Code and even possible violations should always be reported and addressed.

Maintain Confidentiality, Protect Proprietary Information, Intellectual Property and Personal Data

Confidentiality

Information is among our most important assets. We are all responsible to protect the confidentiality of Westinghouse's information. Confidential Westinghouse information includes:

- Proprietary and confidential technical information
- Accounting and financial information
- Business and strategic development plans
- Customer and supplier information
- Information about upcoming acquisitions
- Personal data

Proprietary Information

Proprietary information includes information, data, software, drawings, designs, specifications, hardware, matter or thing of a secret, proprietary, confidential or private nature identified as confidential, proprietary or the like, relating to the business of Westinghouse, including matters of a technical nature (such as know-how, processes, data and techniques), matters of a business nature (such as information about schedules, costs, profits, markets, sales, customers, contractual dealings with each other), matters of a proprietary nature (such as information about patents, patent applications, copyrights, trade secrets and trademarks), other information of a similar nature, and any other information that has been derived from the foregoing information. Proprietary information may be treated as secret and confidential (e.g., Westinghouse Proprietary Class 1, Westinghouse Proprietary Class 2) or may not be confidential (e.g. Westinghouse Non-Proprietary Class 3), to preserve our competitive advantage and operational security.

For more information, refer to **BMS-LGL-28 — Westinghouse Proprietary Information**; **BMS-LGL-32 — Marking and Handling Proprietary Information**; **BMS-LGL-36 — Computer Software Intellectual Property Management**; and local in-country policies.

Public and Media Inquiries

Any request received by employees for interviews or Westinghouse information from an outside organization will be referred to Global Communications. Westinghouse employees are not authorized to interact with media on the company's behalf, including through social media. All inquiries should be directed to the team at **Media@Westinghouse.com**.

How to protect confidential business information

- Emails containing confidential business information must be handled in accordance with applicable policies.
- Minimize confidential data stored locally on your laptop, password protect it, and always lock your screen when you are away.
- A paperless approach should be adopted wherever possible — only print confidential business information when you need to, and do not leave any printed documents in plain view or at printers.
- Confidential information should be locked away if required to be retained, shredded or disposed of in a secured shredding bin if no longer needed.
- Documents and laptops with confidential information should only be taken off premises when necessary to fulfill your job duties and must be secured at all times.
- Share confidential information only to the extent necessary for a business purpose with prior legal approval.
- Exercise caution when discussing confidential information with Westinghouse colleagues outside the office.
- Continue to protect confidential information even after a business relationship or opportunity has been terminated.
- When unsure, contact Legal or Global Compliance with questions about confidential information.

When traveling outside your home country, submit a "Cross-Border Work Request" IT ticket or contact Global Trade Compliance about any laptop restrictions or to obtain a loaner laptop.

For more information see: **BMS-IS-46 — Westinghouse Global Information Security Policy; HR-92 - Temporary Cross-Border Remote Work Policy.**

Intellectual Property

Intellectual property is any know-how, knowledge, or knowledge artifact that promotes the competitiveness of Westinghouse. Intellectual Property includes Proprietary Information as defined above, and also includes information that although available to the public, is protected by law or statute, such as patents trademarks and copyrights.

For more information, refer to the **BMS-LGL-48 — Trademarks and Service Marks**; **BMS-LGL-29 — Guidance on Copyrights**,and local in-country policies. Visit the Intellectual Property Committee page on george for the latest Patent Invention Procedure.

Personal Data

Personal Data is information regarding individuals or that could enable the identification of individuals, either via by direct and/or indirect means. Personal Data may include identification data, contact details, demographic information, but also online identifiers and factors about the physical, cultural, digital identity of an individual, etc.

Personal Data loss or misuse may result in harm to individuals, including embarrassment, inconvenience, and fraudulent data use. Protecting the confidentiality and integrity of Personal Data is a critical responsibility that Westinghouse takes seriously and expects employees to process and handle Personal Data legally, fairly, and confidentially.

For more information on the principles and guidelines that shall be followed when processing Personal Data refer to the policies listed below.

For more information, refer to **BMS-LGL-105 — Personal Data Protection and Privacy Policy** and **BMS-LGL-151 — Personal Identification Policy.**

Responsible Use of Artificial Intelligence

Westinghouse is committed to remaining compliant with all laws and regulations while utilizing the newest solutions to innovate, enhance business operations, decision-making, and product development. To do so, Westinghouse utilizes Artificial Intelligence (AI) and machine learning to continue to enhance the quality of our products. While AI is a helpful tool, it presents risks which are effectively mitigated by our governance and responsible use of AI Policy. Westinghouse established a Data Ethics Committee (DEC) to conduct risk-based assessments of new, potentially high-risk Artificial Intelligence solutions. No proprietary, personal data, or export-controlled information should be entered into a high-risk AI platform without prior approval from the DEC and respective data owners, or the platform having been previously approved for internal Westinghouse use. If any personal data is used, it should only be in a secure, approved, internal model, not an external high-risk AI platform.

For more information, refer to **BMS-LGL-164 — Policy and Responsible Use of Artificial Intelligence**, **BMS-IRM-48 —Acceptable Use of Generative Artificial Intelligence Technology Policy** and local in-country policies.

Communications and Social Media

We must protect the confidentiality of business and Personal Data as we use social media and all other communication methods. When posting information, comply with all applicable Westinghouse policies and procedures. Post only honest, accurate, and appropriate content.

If you identify any potential misuse of social media, you should report it to Global Communications. Refer to the Westinghouse Social Media Policy to assist you in making responsible decisions about your use of social media.

For more information, refer to **BMS-COM-4 — Social Media Policy** and local in-country policies.

Q I am working on a presentation to be given at a conference in Sweden and it is not entirely clear what markings should be on documents and what I can and cannot share with those attending the public conference. How can I get help to ensure I am properly marking and protecting Westinghouse information?

A The answer can be complicated and so you are always right to seek guidance. You may also refer to BMS-LGL-28, The Classification, Reclassification and Release of Westinghouse Proprietary Information, BMS-LGL-32 Process for marking and Handling Proprietary Information, or seek guidance from our Proprietary Information Coordinator or through the Help Chain.

Q One of my colleagues asked me to send confidential information to her personal email address. She said doing so makes it easier to work on the project while at home. Should I honor her request?

A No. Proprietary information or any other company information should never be sent to a personal email address. You may send the information to her WEC email so long as you follow all applicable policies.

Westinghouse's Commitment to Quality, the Environment, Health and Safety

Our Quality, Environmental, Health and Safety Program

Westinghouse is committed to ethical corporate conduct in the areas of Quality, Environment, Health, and Safety (QEHS). This commitment extends beyond the company, to the communities in which we operate, and is supported by a team of experienced and QEHS professionals dedicated to fulfilling Westinghouse's ethical standard of Integrity at our Core. Westinghouse's commitment to QEHS is present at all levels of the organization. From the shop floor to the corporate boardroom, we encourage all employees to speak up when any quality, safety and environmental concerns arise. Employees can bring concerns to their managers, or to the Westinghouse Global Ethics and Concerns Helpline, available 24/7/365 in all countries in which we operate.

Our QEHS Commitments

Westinghouse is Committed to:

- Ensuring conformance with all applicable legal and other compliance obligations and requirements.
- Providing a safe and healthy work environment by preventing work-related accidents and occupational illnesses, targeting zero harm.
- Identifying and managing QEHS hazards, aspects and risks and implementing effective plans to eliminate or minimize those risks.
- Reducing our environmental impact by minimizing greenhouse gas emissions, raw material and energy usage, and preventing pollution by reducing waste, recycling or reusing materials and resources, and improving energy efficiency across operations.
- Continual improvement of the management system to ensure alignment with the purpose and context of the organization and to support its strategic direction.
- Fostering a culture of QEHS awareness, consultation, participation, and accountability with all our employees and other interested parties.
- Recognizing the special characteristics of nuclear technology and ensuring that activities involving nuclear materials are performed in a manner that ensures that nuclear safety is not compromised by other priorities.
- Setting meaningful, realistic objectives to continually improve our QEHS performance.
- Utilizing qualified and competent resources to implement and maintain our QEHS programs.
- Maintaining a work environment where employees are encouraged to openly express concerns about the safety and quality of our products and services.
- Support and align strategies with Corporate Sustainability Policy.

Environmental Responsibility

At Westinghouse, we conduct business in a way that protects the environment and the public. As a nuclear energy company, we recognize our role in reducing carbon emissions and embrace the opportunity to help create a greener planet. To protect the environment, Westinghouse is committed to:

- Reducing waste, preventing pollution, conserving resources, and using energy efficiently in all our operations
- Continually improving environmental management systems and performance by establishing and maintaining meaningful objectives and targets
- Training employees to work in an environmentally responsible manner
- Conducting environmental compliance and EHS management system audits to ensure compliance to our applicable legal requirements, permits, regulations, and standards
- Working towards our interim 2030 Scope 1 + 2 and Net Zero 2050 goals through our Decarbonization Plan

Health

Westinghouse strives to protect both the physical and psychological health of its employees, customers, and neighbors. To support this, Westinghouse is committed to:

- Fostering a culture of respect for others
- Maintaining the highest standards of diligence in protecting the communities in which we operate
- Ensuring proper nuclear material control and accountability

Safety

Our ZERO incident goal applies to all aspects of safety, security, and quality — as well as ethics and integrity. Everyone must accept the responsibility for keeping themselves and their workplace safe. To support this, Westinghouse is committed to:

- Show respect for others
- Follow the rules
- Stop when unsure
- Promptly report problems
- My signature is my word

Security

We are committed to a secure and safe workplace supporting our world-wide business delivering safe, cost-effective, and secure solutions. Our focus is:

- A violence-free workplace
- Preventing loss or compromise of sensitive information or intellectual property, and company property and assets
- Providing crisis management and risk mitigation
- Providing travel and threat intelligence
- Restricting prohibited items from entry into the Westinghouse workplace
- A drug and alcohol-free workplace
- Proper nuclear material control and accountability
- Implementing and maintaining personnel access control
- Standardized security practices during M&A process

For more information, see **BMS-SEC** documents.

Safeguards Compliance

Westinghouse facilities comply with applicable national, regional, and international safeguards regulations. The Global Nuclear Safeguards program enhances collaboration between Westinghouse units that are responsible for adherence to national, regional, and international safeguards requirements and ensures the appropriate protection of safeguards information in Westinghouse systems. Westinghouse ensures early engagement with relevant safeguards equities to reduce risk to scope, schedule, budget, and licensing to comply with safeguards requirements globally.

Quality

Westinghouse fulfills quality requirements and meets customer expectations while focusing on continuous improvement and delivering excellence. Westinghouse designs, sources, produces, markets, and delivers products and services in a compliant and reliable manner. We strive to deliver our products and services with uncompromising first-time quality. Engagement from every employee, in their respective role, fosters a culture of quality through the company.

For more information, refer to **BMS-NSC-1 — Maintaining a Positive Nuclear Safety Culture (NSC) and Safety Conscious Work Environment (SCWE)** and **BMS-ECP-1 — Employee Concerns Program Procedure, POL-WEC-001 — QEHS Policy**, and local in-country policies.

Q I am working at a customer site and their safety standards are different. I am concerned that this may put our employees at risk. What should I do?

A You must ensure the safety of yourself and those around you. If there is an immediate safety risk, you should stop work and notify the highest-level Westinghouse leader at the worksite so that he or she can further advise you and notify the customer. Working with the customer, your supervisor will coordinate with Westinghouse leadership, and Environment, Health, and Safety, and Nuclear Safety organizations to develop a solution that allows us to comply with Westinghouse policy while safely meeting customer needs.

An important part of a healthy nuclear safety culture (NSC) is a Safety-Conscious Work Environment (SCWE). SCWE is an environment in which personnel feel free to raise safety concerns without fear of retaliation, intimidation, harassment or discrimination, where concerns are promptly reviewed, given the proper priority based on their potential safety significance, and appropriately resolved with timely feedback.

In addition to ensuring a SCWE, we instill the following traits of a healthy NSC into all work activities:

1. Personal accountability
2. Questioning attitude
3. Effective safety communication
4. Leadership safety values and actions
5. Decision making
6. Respectful work environment
7. Continuous learning
8. Problem identification and resolution
9. Environment for raising concerns
10. Work processes

Concerns regarding nuclear safety or compliance with nuclear regulatory requirements may be raised directly with the Global Employee Concerns Program.

“Relativity applies to physics, **not** ethics.”

—ALBERT EINSTEIN

Make a Difference

We make a difference both through the work we do for Westinghouse and in our personal lives outside of work.

Community

Westinghouse supports communities where we do business by making charitable contributions. The Westinghouse Charitable Giving Program enables us to provide financial support to communities in one or more of our strategic areas of giving: education, with a focus on science, technology, engineering, and mathematics; environmental sustainability; and community safety and vitality.

Sustainability

We strive to incorporate principles of sustainability into how we conduct business. At Westinghouse, this means creating value with fewer resources and minimizing negative impacts of our operations and technology. We seek to create sustainable business value through technology innovation, operational efficiency, stakeholder engagement, and personal accountability. To accomplish this, we seek to continually improve our environmental management systems and performance by establishing and maintaining meaningful objectives and targets. Westinghouse is also committed to complying with all applicable environmental laws and regulations. By focusing on sustainability, Westinghouse can better achieve its objective of producing low-emissions electricity, helping us work towards a carbon neutral world.

Protecting Human Rights

We conduct business consistent with the spirit and intent of the United Nations Universal Declaration of Human Rights and other applicable international initiatives. At Westinghouse, we embrace human rights initiatives. This means treating all employees, customers, suppliers, and business partners with dignity and respect. Westinghouse is also committed to conducting due diligence to identify and eliminate business relationships that support modern slavery, human trafficking, and the use of conflict minerals (gold, tin, tantalum, and tungsten sourced from the Democratic Republic of the Congo and the African Great Lakes Region). To support this effort, we have developed a Supplier Code of Conduct and include appropriate terms and conditions in our contracts.

Q I was reviewing bids on a supply contract for tin to be used in one of our facilities. All bidders were US-based suppliers, but one offer was substantially less than the others. I know tin is a conflict mineral, but the price is too good to pass up. Should I accept the offer?

A No, not yet at least. Given that tin is a conflict mineral, Westinghouse must ensure that it is responsibly sourced before we allow it to enter our business operation. A dramatic discrepancy in price could indicate that the tin was sourced from a conflict zone, where slave labor is often used for the extraction, greatly lowering cost. You should contact Legal and Compliance as soon as possible so that they can conduct due diligence on the supplier. Although this may just be a great deal, we must conduct appropriate due diligence to ensure we are honoring our commitment to support human rights.

Q On a plant audit, I noticed that some of the contractors looked rather young. I asked the plant manager about this, and he said, “oh yeah, it’s not a big deal, that is customary here.” When I asked him to provide their ages, he told me he never asked, since they are only contractors and not Westinghouse employees. I am worried Westinghouse may be unknowingly employing child labor, what should I do?

A You should contact Legal and Compliance as soon as possible. The use of child labor is itself a human-rights risk, but also carries with it the potential for modern slavery and human trafficking. Even if the use of child labor is customary and legal in a jurisdiction in which Westinghouse operates, it still prohibited by Westinghouse due to its linkage to human rights violations.

Q An article in my local newspaper mentioned that one of Westinghouse’s suppliers may be investigated for modern slavery. The story did not make national news and I work remotely away from any Westinghouse locations, so it is unlikely others at the company saw the article. This seems like a risk to the business, who should I contact?

A You should contact Legal and Compliance as soon as possible. Whenever you have concerns about any human rights issue within Westinghouse’s supply chain, you should not hesitate to raise concerns. An open reporting culture is crucial to ensuring that we can detect and investigate human rights issues as they occur.

Live the Code — Seek Help and Speak Up

It is the responsibility of each and every one of us to live our Global Ethics Code.

This is Our Code.

At Westinghouse, we pride ourselves on our ***Speak Up*** culture and encourage the discussion of ethical implications. ***Speak Up*** culture means proactively reporting violations of law, our Global Ethics Code, and our policies and procedures through the Westinghouse Help Chain.

Speak up when you see wrongdoing or ethical misconduct.

Our managers and supervisors are an important resource for guidance or concerns related to many company and job-specific policies and processes, work responsibilities, co-worker issues, discipline disputes, promotion opportunities, and issues related to the work environment.

At Westinghouse there are multiple ways to raise concerns, including anonymously through the Westinghouse Ethics and Concerns Helpline.

Our ZERO tolerance policy for retaliation goes hand-in-hand with our belief that speaking up is always the right thing to do.

Report potential or suspected retaliation immediately.

Q What happens when I call the Global Ethics and Concerns Helpline?

A You can call either using your name or anonymously where allowed by law. All Helpline calls are answered by an independent third party. An Intake Specialist will collect information about your concerns and send a report to Westinghouse Global Ethics and Compliance personnel for a confidential review. Independent, qualified, objective investigators designated by the Global Compliance organization will investigate your concerns and will take appropriate action. The identity of the reporter will be protected.

Seek Help and Speak Up by Contacting the Help Chain

SPEAK UP
When Our Code Is Not Followed

- Contact anyone in the Help Chain or file a phone/web report through the Global Ethics and Concerns Helpline
- When you contact the Helpline, the Global Compliance organization will receive your report and assign it for investigation
- Professional, objective, and confidential investigations will be conducted in accordance with local law
- You will receive updates throughout the investigation
- When the investigation is completed, as appropriate, the Global Compliance organization will share the outcome

For more information, refer to **BMS-LGL-92—Ethics and Concerns Reporting and Investigations Policy**.

HELPLINE

You can ask questions, report concerns, or report potential violations through the Global Ethics and Concerns Helpline phone numbers:

BELGIUM
0800-27-178

BULGARIA
0800-46-351

BRAZIL
0-800-000-2808

CANADA
1-844-238-4380

CHINA
400-120-8512

FRANCE
0801-13-00-24

GERMANY
0800-181-6284

ITALY
800932409

JAPAN
0066-3386-8128

MEXICO
800-077-0794

POLAND
800-005-088

SOUTH KOREA
00744906

SPAIN
900752144

SWEDEN
020-12-77-44

UKRAINE
0800-800-682

UNITED KINGDOM
0800-066-8792

UNITED STATES
1-844-238-4380

SUBMIT WEB REPORTS AT:
www.wecconcerns.com

ethicsandcompliance@westinghouse.com

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

SCAN HERE TO USE OUR MOBILE REPORTING SITE

Index

Terminology	Page
Anti-trust	16
Anything of value	15
Artificial Intelligence	25
Boycott	16, 20
Bribe	14, 15, 17, 18
Charitable contributions	17, 29
Conflict of interest	12, 19
Conflict minerals	29
Corruption	14, 17
Discrimination	11
Embargo	20
End-user	20
Export	20
Export license/authorization	34
Facilitating payments	14
Financial fraud	35
Foreign Corrupt Practices Act (FCPA)	14
Fraud	35
Gifts	15, 18
Global Ethics and Compliance Program	7
Global Ethics and Concerns Helpline	7, 10, 30, 31
Government	17, 20
Harassment	11
Import	20
Insider Trading	16
Intellectual property	25
Intermediary	14
Kickback	36
Lobbying	17
Money laundering	15
Nuclear Safeguards	27
Personal Data	25
Proprietary information	16, 24
Public officials	14, 17
Retaliation	7, 11, 30
Sanctions	20
Speak up culture	30
Trade secrets	24
UK Bribery Act	14

Definitions

Anti-trust or competition laws: Laws that prohibit a variety of practices that restrain trade, such as price-fixing, corporate mergers likely to reduce the competitive vigor of particular markets, and predatory acts designed to achieve or maintain monopoly power.

Anything of value: Includes, but is not limited to, cash and cash equivalents, charitable donations, free merchandise, gifts, travel, meals, entertainment, use of corporate assets, and favors, such as educational and employment opportunities for friends and relatives, and loans.

Artificial Intelligence: Artificial Intelligence (AI) refers to the simulation of human intelligence in machines that are programmed to perform tasks that typically require human intelligence, such as learning from experience, understanding natural language, recognizing patterns, making decisions, and solving problems. AI encompasses a wide range of techniques and approaches, including machine learning, deep learning, natural language processing, computer vision, and more.

Boycott: A refusal to engage in business with another party.

Bribe: An offer, request, promise, or authorization to pay, or receipt of anything of value (directly or indirectly) to or from any public official or any other person or entity, including those in the commercial sector, intended to induce the recipient to misuse his or her position to help obtain an improper business advantage.

Conflict Minerals: A mineral mined in an area of armed conflict and traded illicitly to finance the fighting.

Conflict of interest: A conflict of interest is a financial or other interest, direct or indirect, which may affect, or might reasonably be thought by others to affect, an employee's judgment or conduct in matters involving Westinghouse.

Corruption: The wrongful use of influence in a business dealing to procure a benefit for the actor or another person, contrary to the duty and/or the rights of others. Corruption occurs in various forms, including bribery, kickbacks, illegal gratuities, economic extortion, collusion, and conflicts of interest.

Discrimination: Discrimination is the treatment or consideration of, or making a distinction in favor of or against, a person based on the group, class, or category to which the person is perceived to belong rather than on individual attributes. Various types of discrimination include, but are not limited to, age, color, disability, race or ethnicity, religion, gender, and sexual orientation.

Embargo: An embargo is the partial or complete prohibition of commerce and trade with a particular country or a group of countries. Embargoes can mean limiting or banning export or import; creating quotas for quantity; imposing special tolls or taxes; banning freight or transport vehicles; freezing or seizing freights, assets, or bank accounts; or limiting the transport of particular technologies or products.

End-user: The entity that receives and ultimately uses the exported or re-exported items. The end-user is not an authorized agent or intermediary.

Export: Exports include: (a) physically or electronically sending a good or technology across an international boundary or providing a service to a recipient in another country; or (b) disclosure of information to a person of foreign nationality, which is deemed to be an export to that recipient's country regardless of his or her location. Deemed exports can be made by physical delivery, email, facsimile, plant tours, demonstrations, on-the-job or other technical training, briefings, teleconferences, provision of technical assistance, or computer access (remote, WAN/LAN) as user or IT administrator, regardless of location.

Export license/authorization: The authorization by an export agency authority to proceed with a regulated activity (e.g., export, re-export).

Facilitating payments: Small payments to public officials to encourage them to perform actions they are already required to perform, such as clearing goods through customs or issuing a permit.

(Definitions, continued)

Financial fraud: The deliberate misrepresentation of the financial condition of the Company through the intentional misstatement or omission of amounts or disclosures in the financial statements in order to deceive financial statement users. Financial statement fraud usually involves overstating assets, revenue, and profits and understating liabilities, expenses, and losses.

Foreign Corrupt Practices Act (FCPA): U.S. law enacted in 1977, as amended, criminalizes the bribery of foreign officials anywhere in the world where the purpose of the bribe is to influence an official decision in order to obtain a business benefit.

Fraud: The use of one's occupation for personal enrichment through the deliberate misuse or misapplication of the Company's resources and assets. The three major types of fraud are: corruption, asset misappropriation, and financial statement fraud.

Gifts: A gift is something given voluntarily, without the expectation of anything in return. A gift could be considered to be a bribe if it is given or received with the intention of influencing someone to act improperly, or as a reward for having acted improperly.

Government/public official: Government is defined to include all levels and subdivisions of government (i.e., local, municipal, provincial, state, regional, or national, and the administrative, legislative, judicial, and executive branches); government-owned enterprises; and quasigovernmental organizations that are wholly or partially supported by government funds. Public official is any elected or appointed government official or employee at all levels of government (local, state, or national) or branch (legislative, executive, or judicial); anyone acting on behalf of a public official, agency, instrumentality, or enterprise that performs a government function; any employee or other person acting for or on behalf of any entity that is controlled by more than 50% by the government; any government-owned or controlled company; any political party, a political candidate, or anyone acting for or on behalf of a political party; any candidate for public office; or any employee or person acting for or on behalf of a public international organization.

Harassment: Harassment covers a wide range of offensive repetitive behaviors that appear to be disturbing or threatening. Sexual harassment includes persistent and unwanted sexual advances.

Import: An import is a good or technology brought into one country from another. When importing, all Company employees must comply with applicable laws and regulations, which address matters such as classification of goods, marking and labeling of goods, valuation of goods, payment of duties, data filing, and recordkeeping.

Insider Trading: Occurs when non-published information from a company is used to make a trading decision by someone with an invested interest in that company.

Intellectual property: Any and all rights in and arising out of patents and patent applications, industrial designs, trademarks, service marks, brands, logos, trade and business names, copyrights, works of authorship, trade secrets, know-how, inventions, improvements, technology, business and technical information, databases, data compilations, methods, processes and techniques, and all other intellectual or industrial property, and proprietary or other legally enforceable rights, whether registered or not, and any registration of such rights.

Intermediary: Any third party that represents the Company, acts on its behalf, or acts jointly with the Company for the purposes of obtaining, retaining, or directing business as well as distributing or reselling Company's products and/or services, including commissioned sales agents, distributors, sales representatives, consultants, lobbyists, transportation or logistics providers, customs clearing agents, brokers, joint venture partners, and any non-Company third parties operating under a power of attorney granted by the Company.

(Definitions, continued)

Kickback: A kickback is a form of corruption that involves two parties agreeing that a portion of sales or profits will be improperly given, rebated, or kicked back to the purchaser in exchange for making the deal.

Lobbying Activities: Any attempts to influence the decisions of government officials or legislators on behalf of an entity.

Money laundering: Money laundering occurs when companies or individuals attempt to conceal or disguise the proceeds of unlawful activity by moving them in a manner that hides their source and makes them look legitimate.

Nuclear Safeguards: Safeguards are a set of technical measures applied by the International Atomic Energy Agency (IAEA) on nuclear material and activities, through which the Agency seeks to independently verify that nuclear facilities are not misused and nuclear material not diverted from peaceful uses.

Personal data: Information identifying or relating to an individual, that either identifies or can be combined with other data in our possession or readily accessible to identify (directly or indirectly) an individual. Personal Data includes, but is not limited to, name, email address and phone numbers (including personal and Company e-mail address and phone numbers), date of birth, any identification number, location data, an online identifier or one or more factors specific to the physical, physiological, genetic, economic, cultural or digital identity of the Data Subject.

Proprietary information: Information, data, software, drawings, designs, specifications, hardware, matter, or things of a secret, proprietary, or private nature relating to the business of the Company, including matters of a technical nature (such as know-how, processes, data, and techniques), matters of a business nature (such as information about schedules, costs, profits, markets, sales, and customers), matters of a proprietary nature (such as information about patents, patent applications, copyrights, trade secrets, and trademarks), or other information of a similar nature that gives the Company a competitive advantage in the marketplace.

Retaliation: Retaliation is negative action taken against an employee who makes a complaint, raises a concern, provides information, or otherwise assists in an investigation. Retaliatory actions may include, but are not limited to, termination; layoffs; demotion; discipline; denial of benefits, overtime, or promotions; intimidation; failure to hire or re-hire; reassignment; or reduction in pay and hours.

Sanctions: Sanctions, or trade sanctions, are trade restrictions imposed on certain persons, entities, or industries, or on certain activities.

Trade secret: A trade secret is information, including a formula, pattern, compilation, program, device, method, technique, process, or know-how, that has economic value because it is not known to the public.

UK Bribery Act: The Bribery Act 2010 (c.23) is an Act of the Parliament of the United Kingdom that covers the criminal law relating to bribery.

Global Policies and Procedures

In addition to Westinghouse Global Policies and Procedures, regional and country specific policies should also be followed.

Section	BMS Policy or Procedure #	Policy or Procedure Name/Link
Respect Others	BMS-LGL-5	Nondiscrimination and Anti-Harassment Policy
	BMS-LGL-6	Equal Employment Opportunity
Fair Competition	BMS-LGL-34	Competition/Anti-Trust Law Compliance Policy
Avoid Bribery and Corruption	BMS-LGL-11	Anti-Bribery and Corruption Policy
	BMS-LGL-100	Mergers and Acquisitions and Business Partner Anti-Corruption Due Diligence
	BMS-LGL-66	Global Intermediary Procedure
	BMS-AMER-2	Westinghouse Ticket Policy
Participate in the Political Process in Compliance with all Regulations	BMS-LGL-101	Global Procedure on Political Contributions
	BMS-COM-5	Global Procedure on Charitable Donations & Volunteerism
	BMS-LGL-22	Global Policy on Gifts, Hospitality and Travel
Act in the Best Interest of the Company	BMS-LGL-24	Personal Conflict of Interest
Trade Lawfully	BMS-LGL-73	Global Trade Compliance Company Policy
	BMS-LGL-87	U.S. Export Manual
	BMS-LGL-65	U.S. Import Manual
	BMS-LGL-96	EU Export Manual
	BMS-LGL-70	China Technology Control Plan
	BMS-LGL-90	China Import Compliance Manual
	BMS-LGL-91	Antiboycott Procedure
	BMS-LGL-31	Denied Party & Embargo Screening Procedure
	BMS-LGL-141	Global Sanctions Policy
Be Accurate and Transparent	BMS-FIN-12	Controller's Manual Governance Policy

(Global Policies and Procedures, continued)

Section	BMS Policy or Procedure #	Policy or Procedure Name/Link
Maintain Confidentiality and Personal Data	BMS-LGL-8	Privacy of Electronic Information
	BMS-LGL-105	Personal Data Protection and Privacy Policy
	BMS-LGL-151	Personal Identification Policy
	BMS-LGL-164	Policy and Responsible Use of Artificial Intelligence
	BMS-IRM-48	Acceptable Use of Generative Artificial Intelligence Technology Policy
	BMS-LGL-28	The Classification, Reclassification and Release of Westinghouse Proprietary Information
	BMS-LGL-29	Guidance on Copyright
	BMS-LGL-32	Process for Handling Proprietary Information
	BMS-LGL-36	Computer Software Intellectual Property Management
	N/A	See the Intellectual Property Committee page on george for the latest Patent Invention Procedure
	BMS-LGL-48	Guidance on Trademarks and Service Marks
	BMS-IS-46	Westinghouse Global Information Security Policy
	BMS-SEC-1	Security and Asset Protection
	BMS-COM-4	Social Media Policy
Westinghouse's Commitment to the Environment, Health and Safety	BMS-ECP-1	Employee Concerns Program Procedure
	BMS-NSC-1	Maintaining a Positive Nuclear Safety Culture and Safety Conscious Work Environment
	N/A	Commitment to Nuclear Safety Culture
	N/A	Quality Management System-A (QMS)
	BMS-SUS-1	Product Sustainability
	POL-WEC-001	QEHS Policy
		Search "EHS" in george for company-wide EHS policies procedures, and guidelines.
Live the Code—Seek Help and Speak Up	BMS-LGL-92	Ethics and Concerns Reporting and Investigations Policy

©2025 Westinghouse Electric Company, LLC.
All Rights Reserved.