GLOBAL

Ethics Code

OCTOBER 2019

Danielle
Churchill, Pennsylvania, USA

Westinghouse
"The time is always right to do what is right."

—MARTIN LUTHER KING, JR.
A Message from Patrick

Ethics, Compliance and Integrity are critical components of how we do business at Westinghouse. We must perform successfully in each of these areas to maintain a seat at the table; together, they are essential to our license to operate.

Every day, in every situation and in every country where we do business or intend to, we all must follow ethical business practices as outlined in our Global Ethics Code. Whenever needed, remind our colleagues, contractors and partners about our ethical business practices and live them yourself as a behavior defining who we are. By doing so, we can be sure that we are taking the right actions and maintaining our strong ethical culture. Keeping Integrity at Our Core is a responsibility of every employee in our company, at any time, in all circumstances.

I am pleased to introduce the annual update of our Code. Along with the companion training, our Code helps us all to understand what is required of us, and the laws that we must follow in our business. Our Code and training also detail the resources that are available to support us whenever we have questions or concerns. One key resource is the Global Ethics and Concerns Helpline that you can contact in multiple ways, in full confidentiality, as explained in the Code. Always remember – Westinghouse has zero tolerance for any kind of retaliation against those who report issues.

We owe it to our colleagues, our customers, our regulators, our stakeholders – and ourselves personally – to always act with the highest levels of integrity. I am proud to join you in carrying forward Westinghouse’s great heritage and traditions. And I welcome the opportunity to work with you to achieve the world-class ethical performance that will keep our business strong in the future.

Respectfully,

Patrick Fragman
President and Chief Executive Officer
this is my CODE
Eleonora
Nivelles, Belgium
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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 Ethics and Compliance Program

Westinghouse has an independent Ethics and Compliance Program under the direction of the Chief Compliance Officer. The Global Ethics and Compliance organization manages a compliance program built to promote ethical decision making and prevent and detect unethical behavior. While having a strong Ethics and Compliance Program is important for our success, compliance is the responsibility of every Westinghouse employee.

The Global Ethics and Compliance organization collaborates with the Business Units and Global Functions including People and Culture, Finance, Internal Audit, Supply Chain, Global Employee Concerns Program, Security, and others to maintain an effective compliance program. Our Global Compliance Liaison Network is designed to help answer Ethics and Compliance related questions in your organizations.

This Global Ethics Code is a key element of our Ethics and Compliance Program and sets the written standards of ethical behavior for all Westinghouse employees.

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
- Your Human Resources representative
- Global Ethics and Compliance organization
- Global Employee Concerns Program
- Confidential Global Ethics and Concerns Helpline
- Legal
- Internal Audit
- Global Compliance Liaison Network

Global Ethics and Compliance Program

- Commitment to doing business legally and ethically
- Confidential process to investigate and address concerns
- Guidance on ethics and compliance issues
- Ethics and compliance training
- ZERO tolerance for retaliation for raising concerns

Program Oversight
Written Standards and Procedures
Training and Communications
Confidential Reporting
Auditing and Monitoring
Response and Prevention
Enforcement and Discipline

Compliance Program Elements
- Anti-trust
- Joint Venture Compliance
- Gifts and Hospitality
- Conflicts of Interest
- Trade
- Human Rights
- Charitable Contributions
- Intermediaries
- Data Privacy
- Global Compliance Liaison Network
Integrity is doing the right thing when you don’t have to – when no one else is looking or will ever know...

—CHARLES MARSHALL
**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.

**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, suppliers, and other business partners working with or on behalf of Westinghouse to comply with our Code.

**Code waivers**

Any waiver of this Code must be approved by the Chief Compliance Officer, General Counsel, and the Audit Committee Chair of the Board of Directors.

**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 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

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*WesDyne International LLC (“WesDyne”) has a separate Code of Business Ethics, which governs that company. WesDyne holds a US facility security clearance and operates under a Special Security Agreement (SSA). Westinghouse and its affiliates may not control or influence WesDyne’s performance of classified contracts and participation in classified programs, except as authorized under the SSA. Company employees must abide by the SSA in all interactions with WesDyne. From time to time the Company may also be cleared under special conditions for classified work. All classified information must be protected in accordance with US Law. Unauthorized access to classified information is subject to civil and criminal penalties.
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
- Your Human Resources representative
- Global Ethics and Compliance organization
- Global Employee Concerns Program
- Confidential Global Ethics and Concerns Helpline
- Legal
- Internal Audit
- Global Compliance Liaison Network

Q: If I observe a violation of our Code, do I have to call the Ethics and Concerns Helpline or can I discuss the issue with my supervisor and/or Human Resources?

A: 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 Ethics and Compliance organization, Legal, Internal Audit, Global Employee Concerns Program, or your Compliance Liaison. If your concerns are still unresolved call the Global Ethics and Concerns Helpline.

Am I Making the Right Choice?

IF YOU ARE NOT SURE, SEEK HELP USING THE WESTINGHOUSE HELP CHAIN

- Is it legal?
- Is my action free from harm to others?
- Is my action one that I can be proud of?
- Is my action consistent with our Code and values?
- Would my action be seen as appropriate by my co-workers?
- Will my action support a positive corporate reputation?
- Am I involving the right people in the decision-making process?

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 is the right thing to do. Building a diverse workforce will give us a competitive advantage, enable us to make more informed business decisions, and help 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 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:

- 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, gender, sexual orientation, disability, or any other non-job-related characteristics including those protected by law
- Verbal, written, or graphic statements directed at any employee or group of employees

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

For more information, refer to All Forms of Harassment Prohibited and/or Equal Employment Opportunity and local in-country policies.
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
- Avoid unfair or deceptive trade practices
- Focus on high quality customer service
- Follow customer site requirements, policies, and procedures

Q I am overseeing the bidding process for a new contract. I thought that a vendor we were considering in South Korea was going to win as it met all technical specifications and came in at the lowest price. My supervisor asked me to pick another vendor even though it was more expensive and did not meet all technical criteria.

A Your responsibility is to seek the best value proposition for Westinghouse. In this case, you may wish to ask your supervisor why he/she is asking you to select another vendor. If you are uncomfortable discussing the situation with your supervisor, use another avenue in the Westinghouse Help Chain to raise your concerns.

Suppliers

We hold our suppliers to the same standards of integrity to which we hold ourselves. All suppliers must comply with our Westinghouse Supplier Code of Conduct.

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 of conflict of interest
- Ensure timely payments are made to suppliers for goods and services received
- Keep supplier pricing confidential
- Report situations where suppliers are not compliant with our standards

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.

For more information, refer to Westinghouse Supplier Code of Conduct and local in-country policies.
We compete fairly and openly, which benefits our customers and our communities. We win because of the quality of our products and services. Competition and anti-trust laws can be very complex, and failure to follow them can lead to serious consequences.

Competitors

Anti-trust laws promote each company’s independence when making decisions on competitively sensitive factors, such as price and contract terms. You should not do or even discuss the following with competitors because even a discussion could be unlawful:

- Fix or coordinate prices
- Facilitate collusive bidding or bid rigging
- Boycott certain customers or suppliers
- Share information with competitors about prices, profits, or profit margins
- Divide or allocate markets, territories, or customers
- Exchange or share any unpublished information concerning prices or any other competitive 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 not uncommon for a competitor on one project to be a supplier or customer on another, and a partner on yet another. This unique interconnectivity presents both opportunity and risk. We must be extremely careful to neither intentionally nor accidentally share or discuss information that could lead to unfair competition or compromise confidential business or proprietary information. Consult Westinghouse Legal if you believe any inappropriate actions that interfere with competition may be occurring.

A friend of mine works for another nuclear technology vendor in the United Kingdom. When we were out to dinner, she started talking about pricing information relating to a project her company is bidding on and that Westinghouse is also bidding. Should I share this information with the Westinghouse proposal team so we can be sure to beat her company’s price?

No, you should not share this information and you should ask your friend not to discuss this type of information with you. You cannot share this information with the proposal team as it could violate the law and does violate our Code. Our Code includes valuing fair competition. Having potential insider pricing information influence our bid would be a violation of our Code. If you find yourself in this kind of situation, you should say that you feel the conversation is not appropriate, leave, and contact your supervisor as soon as you are able. If your supervisor is not available, or if you prefer to do so, use another avenue in the Westinghouse Help Chain to raise your concerns.

For more information, refer to our Competitive Law Compliance Manual and local in-country policies.
Prevent Bribery and Corruption

Westinghouse has a ZERO tolerance policy for any and all forms of bribery and corruption. Never offer, give, solicit, or accept a bribe, and avoid any and all perceptions of corrupt behavior.

Follow the Westinghouse anti-corruption policy and all anti-corruption laws in countries where we do business. These include the US Foreign Corrupt Practices Act (FCPA), the UK Bribery Act, as well as other international anti-corruption laws.

In some countries, employing intermediaries to assist with obtaining business or satisfying governmental regulation is a common practice. The use of intermediaries, however, could increase the risk that corruption could occur. An intermediary is any third party who represents the company, acts on its behalf, or acts jointly with the company for the purposes of obtaining, retaining, or directing business, or distributing or reselling company’s products and/or services, or assisting with the satisfaction of governmental requirements. Examples of intermediaries include brokers, commissioned sales agents, consultants, customs clearing agents, distributors, and transportation or logistic providers.

Both direct and indirect bribery (that is, bribery committed by or through intermediaries) is prohibited. All new intermediary relationships globally require approval by Westinghouse Legal and the Global Ethics and Compliance organization. All intermediaries are vetted through risk-based due diligence, are required to sign an annual Anti-Corruption Certification, and may be trained on the Westinghouse anti-corruption policies and procedures.

Our policy prohibits facilitating payments or grease payments. These are small payments made to public officials typically to encourage them to perform actions they are already required to perform more quickly, such as clearing goods through customs or issuing a permit.

An offer of employment to a public official, an immediate family member thereof, or a similar individual known to 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 Ethics and Compliance Departments is required.

Employees must promptly and proactively report known or suspected bribery and corruption, including allegations involving intermediaries to the Global Ethics and Compliance organization. Westinghouse prohibits retaliation against anyone who raises an allegation in good faith.

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.

What is a bribe?

A bribe is offering, giving, or promising to give anything of value with the intent to improperly influence business decisions and create/or obtain an unfair business advantage. Given the circumstances, intent may be implied, even if not express. Bribes may include:

- Cash, cash equivalents, and/or loans
- Lavish gifts, hospitality, travel, and entertainment
- Offers of employment
- Other favors, either business-related or personal
- Charitable or political contributions

For more information, refer to our Anti-Bribery and Corruption Policy and Global Intermediary Procedure.
this is my CODE

Anees
Cranberry Township, Pennsylvania, USA
Participate in the Political Process in Compliance with all Regulations

Political Activities and Contributions

Westinghouse employees must alert the Westinghouse Government Affairs office prior to meeting with US and foreign public officials when on company business, and also copy Westinghouse Government Affairs on all communications with public officials.

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 personal political activities, do so on your own time and at your own expense.
• Do not use Company resources for political purposes.
• Do not make or commit to make political contributions on behalf of Westinghouse.
• Do not solicit contributions for political causes or candidates from fellow employees while on work time or on company property.
• If you ever feel pressured at work to participate in any political activity or make any contribution, report it through the Westinghouse Help Chain.

In the event you are solicited or intend to make a political donation to a foreign (non-U.S.) candidate or campaign, you must consult and comply with Global Procedure on Non-US Political Contributions.

Ensure Appropriateness of Charitable Contributions

Employees are encouraged to be active in their communities, including by making charitable contributions of 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 via your own personal email and internet systems, unless you are supporting specific Westinghouse-sponsored charitable programs.

Employees are not authorized to make charitable contributions on behalf of the Company without 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 Global Procedure on Charitable Donations and Volunteerism to obtain appropriate approvals. In some instances, charitable contributions present a potential risk of corruption in some countries, particularly in certain countries. Therefore, employees must comply with Westinghouse policy and applicable laws.

Q I understand that we cannot make political contributions with Westinghouse funds directly. But can I support a political party candidate indirectly – for example, am I allowed to purchase a ticket for a fundraiser for their party with Westinghouse funds?

A No, our policy prohibits not only direct contributions of Company money, but also indirect contributions of Company time or money in support of candidates or political parties, such as the purchase of tickets to political fundraising events or the furnishing of goods, services, equipment, or other things of value to candidates, political parties, or committees, without prior approval from the Ethics and Compliance Department.

Q The general manager of one of our customers, a government-owned utility in Brazil, asked if Westinghouse can provide a charitable contribution to a local nonprofit foundation. It is a very good cause and we would like to maintain a good relationship with our customer. Can we provide a contribution to this nonprofit per the customer’s request?

A Maybe. You must work with the Ethics and Compliance department to ensure that the contribution is provided in accordance with all applicable laws, including anti-corruption law and Westinghouse policy. We have to be careful when requests for charitable contributions come directly from public officials and must scrutinize such contributions closely because in some instances, public officials have used this avenue as a means to receive a bribe.

For more information, refer to Global Procedure on Charitable Donations and Volunteerism and the Global Procedure on Non-US Political Contributions.
Act Responsibly when Giving or Receiving Gifts, Hospitalities, and Travel

The giving and receiving of modest gifts, hospitalities, and travel is part of doing business globally. However, if done lavishly, it can create the appearance that business decisions are made unfairly and can be prosecuted as bribery. If you are giving or receiving gifts, hospitalities, or travel, it is your responsibility to ensure that you comply with the Westinghouse Global Policy on Gifts, Hospitality and Travel and relevant country-specific policies and receive required pre-approvals. This protects Westinghouse and you by ensuring that the gifts, hospitalities, and travel are permissible under applicable laws.

Due to the varying perception of gifts around the world, Westinghouse prohibits giving gifts, of any kind, to anyone. If you are offered a gift, you may only accept it if it is nominal in value (but never if it is cash or a cash equivalent, such as a gift card), provided without expectation of a return, and in accordance with local law.

If accepting a gift or hospitality does not feel right, refuse it and consult with your manager or the Global Ethics and Compliance organization.

Permissible hospitality, which includes meals and entertainment include acts 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 in value
- Not perceived as likely to influence judgment
- Not imposing a sense of obligation on the recipient
- Reported or approved in accordance with Westinghouse policy

For more information, refer to Global Policy on Gifts, Hospitality and Travel.

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.

Q: Our supplier in France has offered to pay for economy airfare, hotel, and conference fees for a trade show that may be interesting for us to attend. Am I allowed to accept this?

A: Depending on who the supplier is, the business need, and whether there are any pending contracts to be awarded to the supplier, it may or may not be appropriate for the supplier to pay for your conference fees. Contact the Global Ethics and Compliance organization for guidance.

Q: A supplier offered me two soccer match tickets while I am at a conference in Spain. Can I accept the tickets?

A: Depending on who is attending and the value of the tickets, you may need to get approval before you accept the tickets. Review the Global Policy on Gifts, Hospitality and Travel and your regional procedures and secure the appropriate approvals before accepting any such offer.
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
- Comply with the Personal Conflicts of Interest Policy, including disclosure requirements

Conflict of Interest

Having a conflict of interest is not always a violation of our Code, but failure to disclose most definitely is. Here 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
- Serving on the Board of Directors of certain for-profit businesses

For more information, refer to Personal Conflicts of Interest Policy and local in-country policies.

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 Board with the Global Ethics and Compliance organization before accepting a directorship.

For more information, refer to Personal Conflicts of Interest Policy and local in-country policies.

this is our code

Westinghouse Women in Nuclear Group
Cherie, Cheryl, Lauren, Whitney, Lori, Erica, Monica, Sarah, Maddie, Ashley, Nicole Cranberry Township, Pennsylvania, USA
# Trade Lawfully

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

<table>
<thead>
<tr>
<th>Export Controls</th>
<th>Import Compliance</th>
<th>Embargoes and Sanctions</th>
<th>Anti-Boycott Laws and Regulations</th>
</tr>
</thead>
<tbody>
<tr>
<td>Employees are required to comply with export control laws in all countries in which we do business. As US export control laws continue to apply to exported US goods and technology, all Westinghouse sites globally must comply with both local and applicable US export regulations.</td>
<td>Westinghouse complies with import laws in all countries in which we do business, including classification and marking requirements. Preferential duty programs are utilized to maximize cost savings for our business and our customers.</td>
<td>At any time, a 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.</td>
<td>Westinghouse and its non-US subsidiaries, offices, and affiliates shall not participate in any economic boycott that is contrary to US anti-boycott laws. Westinghouse reports any such requests to the US government, as required by law.</td>
</tr>
</tbody>
</table>

## 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 Global Trade Compliance Company Directive and local in-country policies.
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 US anti-boycott laws. You should check with the Global Trade Compliance group before proceeding.

Q My customer in Spain is refusing the inclusion of an export control provision in our contract. I know from past experience that this item does not require a license for the proposed transaction. Given a license is not required, do I still need to include export language in this contract?

A Situations like this must be reviewed on a case-by-case basis. While the initial transfer under this contract may not require a license, any subsequent re-transfer of the product(s) or technology may require a license. Westinghouse’s standard export control language does not permit the subsequent re-transfer without prior consent so that Westinghouse may review the new transaction to determine if an export license is required.

Q I am a manager in the United Kingdom and have a potential business opportunity with a Russian company that may be sanctioned by the US government. As there will be no US involvement in this transaction, do I have to worry about US sanctions?

A Yes. All Westinghouse locations globally must comply with US sanctions and embargoes, in addition to local export laws. Contact the Global Trade Compliance group for guidance as needed.
Guoqiang
Churchhill, Pennsylvania, USA
Be Accurate and Transparent

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 all financial transactions are properly authorized
- Meeting all accounting, financial, tax, and other relevant regulatory requirements in countries where we operate
- Ensuring accurate and transparent financial reporting
- Ensuring accurate reporting on project status, costs, and schedules
- 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
- 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 Controller’s Manual Governance Policy 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.

Rickard
Västerås, Sweden
Maintain Confidentiality, Protect Proprietary Information, Intellectual Property and Personal Data

Confidentiality
Information is among our most important assets. We all have the responsibility to protect Westinghouse confidential information.

- Accounting and financial information
- Business and strategic development plans
- Customer and supplier information
- Information about upcoming mergers and acquisitions

Proprietary Information
Proprietary information includes information, technological knowledge, data, documents, or any other items that are the property of Westinghouse. Proprietary information and artifacts (e.g., documents, computer files, drawings) may or may not be treated as secret and confidential, but they need to be protected in order to preserve our competitive advantage and operational security.

For more information, refer to the Classification, Reclassification and Release of Westinghouse Proprietary Information and/or the Handling and Use of Westinghouse Proprietary Information under Government Contracts, and local in-country policies.

Intellectual Property
Intellectual property is any know-how, knowledge, or knowledge artifact that promotes the competitiveness of Westinghouse. Due care must be used when working with these materials to avoid inadvertent disclosure. Some examples of intellectual property that needs to be protected include:

- Copyrights and trademarks
- Patents and inventions
- Trade secrets and designs

For more information, refer to Computer Software Intellectual Property Management and/or the Guidance on Trademarks and Service Marks, and local in-country policies.

Personal data
Personal Data are information regarding individuals or that could enable the identification of individuals, including identification data, contact details, demographic information, but also online identifiers and factors about the physical, cultural, digital identity of the 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 Personal Data legally, fairly, and confidentially.

How to protect confidential business information

- Emails containing confidential business information must be handled in accordance with applicable policies.
- Do not leave confidential business information in plain view or at printers. Always lock your computer screen when you are away.
- When away from your workspace, secure your laptop and store confidential information in drawers or locked cabinets.
- Documents containing confidential business information must be shredded or disposed of in a secured shredding bin.
- Only take documents and laptops with confidential information off premises when necessary to fulfill your job duties. Secure them at all times.

When traveling outside your home country, contact the Westinghouse Enterprise Service Desk or Global Trade Compliance about any laptop restrictions or if you need a loaner laptop.

For more information, refer to Protection and Privacy of Personal Data (Non-E.U.) and the Personal Data Protection and Privacy in the European Economic Area 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 the Westinghouse Social Media Policy and local in-country policies.

Public and Media Inquiries
If employees receive requests for interviews or Westinghouse information from outside organizations and, in particular, news media, such requests shall be referred to Global Communications.
Q I am working on a project in China and it is not entirely clear what markings should be on documents and what I can and cannot share with our partners or potential customers. 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. Refer to Handling and Use of Westinghouse Proprietary Information, The Classification and Reclassification and Release of Westinghouse Proprietary Information, Process for Handling Proprietary Information, or seek guidance from our Proprietary Information Coordinator or through the Help Chain.

Q I came to Westinghouse from one of its competitors. I have confidential information I developed while working for that competitor. Sharing some of it with my new Westinghouse colleagues can really help us with the upcoming bid on a large project. Can I share this information since I developed it?

A No. This would be in breach of your obligations to your previous employer, possibly the law, and also our Code of Ethics. You have the obligation to protect your prior employer’s information as you have an obligation to protect Westinghouse’s information. General knowledge and skills obtained during your prior position can be used, but protected or confidential information cannot be shared. If you are unsure, consult Legal for further guidance.

Q I am working on a utility customer project in Taiwan and would like to include supplier information that is marked with the supplier’s proprietary notice as a deliverable to the customer. May I include the supplier proprietary information in my utility customer deliverable?

A It depends on the language of the agreement under which Westinghouse obtained the supplier proprietary information. You should consult with your Global Supply Chain Solutions representative to see if you are contractually permitted to transfer supplier proprietary information to the utility customer.
this is my CODE

Yanjie
Shanghai, China
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?

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.

We are committed to being the safest and most environmentally responsible company in our industry. We encourage employees to speak up when any safety and environmental concerns arise.

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 stay safe:

- 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:

- Ensuring a violence-free workplace
- Preventing loss or compromise of sensitive information or intellectual property, and company property and assets
- Providing crisis management and contingency mitigation
- Providing travel and threat risk management
- Restricting prohibited items from entry into the workplace
- Ensuring a drug and alcohol-free workplace
- Ensuring proper nuclear material control and accountability
- Implementing and ensuring personnel access control

Environmental Responsibility

We conduct business in a way that protects the environment and the public. We are committed to maintaining and operating our business in compliance with applicable laws and Westinghouse policies.

Quality

We meet or exceed quality requirements and customer expectations while focusing on continuous improvement and delivering excellence. We achieve accuracy in quality inspections and testing, maintain quality certifications, and comply with laws, regulations, and standards as we strive for ZERO defects and ZERO errors.

For more information, refer to Maintaining a Positive Nuclear Safety Culture and Safety Conscious Work Environment and/or the Employee Concerns Program Procedure, and local in-country policies.
“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.

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.

“If someday they say of me that in my work I have contributed something to the welfare and happiness of my fellow man, I shall be satisfied.”

—George Westinghouse

this is my CODE
Westinghouse Employees
Hockenheimring
Baden-Württemberg, Germany
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.

Seek Help and Speak Up by Contacting the Help Chain

- Global Employee Concerns Program (ECP)
- Supervisor
- Human Resources
- Other Manager
- Legal
- Chief Compliance Officer
- Internal Audit
- Global Ethics and Concerns Helpline
- Chief Compliance Officer
- Internal Audit
- Global Ethics and Concerns Helpline
- Other Manager
- Legal
- Human Resources
- Supervisor
- Global Employee Concerns Program (ECP)

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 Ethics and Compliance organization will investigate your concerns and will take appropriate action. The identity of the reporter will be protected.

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 Ethics and 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 Ethics and Compliance organization will share the results with you
- As needed, measures will be promptly taken to prevent future violations

For more information, refer to Ethics and Concerns Reporting and Investigations Policy.
You can ask questions, report concerns, or report potential violations through the Global Ethics and Concerns Helpline phone numbers:

**BELGIUM**  
**Step 1:** Dial 0-800-100-10  
**Step 2:** at the prompt enter 8442384380

**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**  
**Step 1:** Dial  
- NTT - 0034-811-001  
- KDDI - 00-539-111  
- Softbank Telecom - 00-663-5111  
**Step 2:** at the prompt enter 8442384380

**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

**UKRAINE**  
**Step 1:** Dial 0-800-502-886  
**Step 2:** at the prompt enter 8442384380

**UNITED KINGDOM**  
**Step 1:** Dial 0-800-89-0011  
**Step 2:** at the prompt enter 8442384380

**UNITED STATES**  
1-844-238-4380

**SUBMIT WEB REPORTS AT:**  
www.wecconcerns.com  
ethicsandcompliance@westinghouse.com

Global Ethics & Compliance Organization  
Westinghouse Electric Company LLC  
1000 Westinghouse Drive  
Cranberry Township, PA 16066-5528
this is my CODE
Danny
Hopkins, South Carolina,
USA
## Terminology

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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.

**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 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.

**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): US 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.

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.

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.

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.
(Definitions, continued)

**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 in good faith 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.
this is my CODE
Jessica
Sanmen AP1000® Plant, China
## Global Policies and Procedures

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

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