
Anti-Bribery and Corruption Policy

Approval

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Table of Contents

Application and Statement of Policy 3

Commitment to Zero Tolerance 3

Prohibited Behaviors 4

Interactions with Public Officials 5

Entertainment, Hospitality, and Gifts..... 5

Political Contributions and Lobbying 6

Charitable Contributions..... 6

Intermediaries 7

Extortion Payments 7

Record-Keeping 8

Life-Long Learning 8

Enforcement and Disciplinary Action 8

Reporting..... 9

Records Retention 11

References..... 11

Revision Summary 11



LEGAL

Anti-Bribery and Corruption Policy

Application and Statement of Policy

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

At Westinghouse, we believe in doing business ethically, honestly, and in full compliance with all laws, regulations, and our Global Ethics Code (BMS-LGL-16). The ABC Policy sets forth our zero-tolerance position prohibiting all forms of bribery and corruption, including all facilitating payments. Put simply, we do not offer or accept bribes in any form and do not tolerate any form of bribery or corruption in connection with any of our business operations, whether directly by us or through any of our intermediaries anywhere in the world.

Commitment to Zero Tolerance

We value our reputation for conducting business ethically and honestly. Therefore, we comply at all times with all applicable anti-bribery and anti-corruption laws, such as the U.S. Foreign Corrupt Practice Act (“FCPA”), U.K. Bribery Act (“UKBA”), as well as other anti-bribery and anti-corruption laws of countries where we do business, including the European Union and the member states of the Organization for Economic Cooperation and Development (collectively, the “ABC Laws”). In the event a country has laws even more restrictive than these laws, the more restrictive law will apply.

Consistent with the ABC Laws and our Global Ethics Code, Westinghouse has zero tolerance for any form of bribery or corruption, including all facilitating payments. Our Policy places the responsibility to vigorously uphold this commitment on you, our directors, officers, and employees. Westinghouse’s zero tolerance for bribery and corruption also extends to our third-party business partners that act on our behalf in providing for our customers. Therefore, it is our responsibility to ensure that all of our business partners understand and adhere to our commitment to ethical business practices. Lastly, each one of us has a responsibility to report any known or suspicious behavior to the appropriate person to ensure that our commitments are upheld.

Compliance with this Policy and all applicable ABC laws is mandatory. Failure to do so can have serious consequences for the Company, in the form of fines, sanctions, and restrictions on our ability to do business, and for individual employees, who may face fines and imprisonment by enforcement agencies and disciplinary action up to and including termination by the Company. It is very important that everyone at Westinghouse understand this Policy and how it applies to our daily work.

Oversight of the ABC Policy is the duty of the Westinghouse Legal Department and the Global Compliance organization (“Global Compliance”), which shall have an adequate level of autonomy from other management and shall be given sufficient resources and authority to carry out this responsibility, including direct reporting to the Chairman of the Audit Committee of the Board of Directors of Westinghouse. In connection with outside counsel, these Departments will oversee, administer, and enforce this Policy and all associated procedures globally. In the event Westinghouse engages in merger or acquisition activities, these Departments will review any proposed transaction to understand whether the target entity poses any risks to Westinghouse under this Policy.

¹ Westinghouse Government Services is responsible for following and implementing appropriate controls to ensure effectiveness of this Anti-Bribery and Corruption Policy.



LEGAL

Anti-Bribery and Corruption Policy

This Policy provides various explanations and tools to help you adhere to our zero-tolerance approach to bribery and corruption. However, no policy can anticipate every possible situation that may occur. You are encouraged to discuss any questions about specific facts and circumstances with your manager or with any member of Westinghouse's Legal or Global Compliance organizations.

Prohibited Behaviors

A “**bribe**” is anything of value that is offered, promised, given, or authorized to be given in order to influence a decision or to gain an improper advantage on behalf of Westinghouse. Westinghouse prohibits all bribes, regardless of value and regardless of recipient. The receipt of a bribe is also strictly prohibited.

A bribe is “**anything of value**”, which includes many things that may not readily appear to be bribes. Notably, the monetary value of these items is irrelevant. Examples are:

- Lavish gifts and presents, with or without a Company logo
- Excessive meals and drinks
- Non-business-related or lavish travel expenses or reimbursements
- Certain entertainment activities, such as sporting or music events
- Political donations of any kind
- Donations to a charity at the direction of a third party
- Employment and educational opportunities
- Entertainment of the family members spouses or friends of customers
- Cash and equivalents, such as gift cards
- Loans or in-kind exchanges
- Uses of Company property
- Certain uses of your personal funds or property
- Excessive discounts or rebates
- Kick-backs, which is a form of bribe where a person entrusted by an employer grants a benefit (a contract) in a way that secures a personal benefit or value (cash) to himself or herself.

“**Facilitating payments**” also known as “**grease payments**” are typically small payments made to encourage someone to perform or speed up the performance of routine functions he or she is otherwise obligated to perform. Common examples of these activities are issuing permits, licenses, or other official documents; processing governmental papers such as visas and work orders; providing police protection, mail pick-up and delivery, or scheduling inspections; providing phone service, power and water supply; or loading and unloading cargo; and actions of a similar non-discretionary nature. However, facilitating payments are considered a form of bribery and are therefore not permitted under this Policy.

This list cannot and does not identify everything that could be considered a bribe. Therefore, it is important that you remain vigilant and apply a questioning attitude toward whether something given or provided to a third party could be a bribe. The Legal or Ethics and Compliance Departments are available to provide guidance in any situation.



LEGAL

Anti-Bribery and Corruption Policy

Interactions with Public Officials

A “**Public Official**” is

- Any elected or appointed officer or employee at any level and branch of government (local, state, or national / legislative, executive, judicial, or administrative)
- Any political party, political candidate, or anyone acting for or on behalf of a political party; as well as any candidate for public office
- Anyone acting on behalf of a public official, agency, instrumentality, or enterprise that performs a government function
- Any employee or person acting for or on behalf of a public international organization, such as the International Atomic Energy Agency, Euratom, United Nations, etc.
- Any employee or other person acting for or on behalf of any entity that is owned or controlled by a government, including commercial entities and other instrumentalities of government
- **All employees of state-owned or state-controlled nuclear and other utilities are public officials.**

Interactions with public officials warrant additional scrutiny because the bribery of public officials has been a longstanding problem in many parts of the world. You should treat your interactions with public officials with additional caution and ensure that you do not violate the ABC Laws or this Policy during these interactions.

You should review the **Westinghouse Global Policy on Gifts and Hospitality (BMS-LGL-22)** carefully prior to any interaction with a public official if you have any reason to believe that these items may be provided, because pre-approval or post reporting of such expenses may be required.

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, either traditionally or as a third party intermediary, may be viewed as a bribe. For this reason, Westinghouse prohibits hiring or engaging public officials, their immediate family members, or similar individuals known to have the ability to improperly favor Westinghouse, without prior-approval from the Legal and the Ethics and Compliance Departments, which will work in consultation with Human Resources Department and the Government & International Affairs Office, in a manner consistent with due diligence requirements, contracting procedures, and any regional, country, or local guidelines for hiring public officials. Any such relationship, if approved, must be (1) in compliance with all applicable Westinghouse approval policies; (2) transparent, (3) conform to local law, and (4) include implemented safeguards to prevent a public official's potential misuse of authority or position.

Entertainment, Hospitality, and Gifts

Entertainment and other forms of hospitality may be appropriate in some situations. Indeed, the agencies that enforce the ABC Laws understand that the provision of these items often serve legitimate business purposes and are not designed to improperly or unfairly influence a decision or to gain an improper advantage. Common examples of these items may include meals, attendance to sporting events, golf events, and other public interactions with third parties. However, depending on the timing, purpose, and value of these items, they may be considered bribes by the various enforcement authorities around the world.



LEGAL

Anti-Bribery and Corruption Policy

The more lavish the hospitality and/or the more closely associated its delivery is with a decision of the recipient, the more likely it is that an enforcement agency may view it as improper. That said, the repetitive giving of smaller items of hospitality may, in the aggregate, be viewed as improper, particularly if the recipient, based upon their job status, views the smaller actions of hospitality as particularly valuable and therefore improperly provides Westinghouse a benefit because of it.

These situations can be confusing. Therefore, the Westinghouse Ethics and Compliance and Legal Departments has developed procedures for you to follow that will help us help you ensure that you do not violate this Policy. As such, all employees must comply with this Policy, as well as understand and comply with the **Westinghouse Global Policy on Gifts and Hospitality** and the **Global Travel and Entertainment Policy** (BMS-FIN-1), and all other procedures relating to the recording, approval, and reimbursement of expenses related to these activities.

Political Contributions and Lobbying

There are many laws regarding political contributions worldwide. In order to ensure that we do not violate any of these laws and to ensure that no political contribution is viewed as a breach of the ABC Laws, all such contributions made on behalf of the Company must be approved in advance by the Westinghouse Government & International Affairs Office, in accordance with Westinghouse procedures and may also require approval by Legal and the Ethics and Compliance Departments.

Any personal political donations made on your own behalf should comply with all local laws and regulations to which you and/or the donation are subject.

Any pre-approved political contribution must be (1) in compliance with all applicable Westinghouse approval policies, (2) legal under the written laws of the country in which it is made, (3) in compliance with all aspects this Policy and its associated procedures, and (4) properly recorded in the Company's books and records.

"Lobbying" is used to describe the process of engaging in political activity to promote a particular point of view and/or interest in any proposed government project or proposed legislation in an attempt to persuade government officials to act in a way that promotes a particular point of view. There are many laws regarding lobbying activities worldwide. In order to ensure that we do not violate any of these laws and to ensure that no lobbying activity is viewed as a breach of the ABC Laws, any engagement of a lobbyist on behalf of the Company must be approved in advance by the Westinghouse Legal and the Ethics and Compliance Departments in consultation with the Government & International Affairs Office, in accordance with Westinghouse procedures.

If a public official, or a family member, representative, or intermediary, requests or solicits you to make a personal donation to a campaign, you should consult with the Ethics and Compliance and Legal Department prior to making the donation to ensure that it does not violate this Policy.

Charitable Contributions

Westinghouse encourages employees to be active in their communities, including making charitable contributions of their own personal choice and volunteering their time. However, you are not authorized to make charitable contributions on behalf of the Company without pre-approval consistent with the **Global Charitable Giving Policy and Procedures** (BMS-COM-5). Additionally, you are not authorized



LEGAL

Anti-Bribery and Corruption Policy

to use any Company items, such as letterhead, to solicit any charitable donations for any personal charitable activity. All personal charitable donations made on your own behalf should comply with all local laws and regulations to which you and/or the donation are subject.

If a public official, or a family member, representative, or intermediary, requests or solicits you to make a personal donation to a particular charity or charitable cause, you should consult with the Ethics and Compliance and Legal Department prior to making the donation to ensure that it does not violate this Policy.

Intermediaries

Under the ABC Laws, Westinghouse may be prosecuted for the actions of others who act on its behalf. In order to avoid prosecution for the acts of others, Westinghouse must work diligently to only employ third parties that have a zero-tolerance approach to bribery and corruption and must undertake efforts to ensure that we prevent intermediaries from paying bribes on our behalf.

“**Intermediary**” refers to an individual(s), a company, or any other entity, no matter how denominated, which provides marketing, sales, liaison, consultation, business development or any other services relating to the sale or supply of Westinghouse products or services and which interacts with customers or Government Officials on Westinghouse’s behalf. This definition includes but is not limited to agents, sales representatives, joint venture partners, distributors, resellers, business consultants interacting with customers or Government Officials, logistics providers, customs brokers, and/or international lobbyists.

Many of the enforcement actions brought under the ABC Laws involve intermediaries. Therefore, intermediaries warrant additional scrutiny. The Ethics and Compliance Department has developed specific procedures for the engagement, due diligence review, approval, payment, and monitoring of intermediaries. If you are involved with the engagement of intermediaries, you must read, understand, and comply with the **Global Intermediary Procedure** (BMS-LGL-66).

Additionally, everyone who interacts with an intermediary has a duty and responsibility to alert the Ethics and Compliance and Legal Departments if he or she has any evidence or suspicion that the intermediary is violating this Policy, the Global Ethics Code, or any ABC Laws. In order to assist you with identifying such violations, the Ethics and Compliance Department has developed a list of common corruption-related “Red Flags”, which are facts or circumstances that may indicate a potential ethical concern, requiring additional diligence be conducted. The list of Red Flags can be found on George.

Extortion Payments

Westinghouse is committed to your safety. If at any time you receive a demand for money or anything else of value under threat of death, bodily harm, or injury to a Westinghouse employee or family member; a threat that a Westinghouse employee or family member may be unjustly or immediately imprisoned; or a serious threat of undue seizure or significant damage to a Westinghouse employee’s property, an otherwise prohibited payment may be made to ensure the safety of the employee or family member. All such payments must be promptly reported, in detail, to the Ethics and Compliance and Legal Department. The payment must be recorded fairly and accurately and described in reasonable detail in the Company’s books and records.



LEGAL

Anti-Bribery and Corruption Policy

Record-Keeping

In addition to prohibiting bribery, some ABC laws require the proper maintenance of accounting and controls records. Westinghouse must keep its books, records, and accounts in reasonable detail, accurately, and such that they fairly reflect all transactions and dispositions of assets. No undisclosed, unrecorded, or “off-the-books” accounts shall be established for any purpose. No one should ever make false, misleading, or fictitious entries into or omit information from Company records.

Life-Long Learning

It is the personal responsibility of all Westinghouse employees to act in accordance with the ABC Laws and this Policy. To ensure that you and your co-workers understand your obligations under this Policy, the Ethics and Compliance Department will engage in the following activities:

1. **Communication:** At the start of employment, all Westinghouse employees shall receive and acknowledge in writing receipt and understanding of this policy during orientation. All existing employees will receive this Policy and be required to acknowledge that they have read and understood its requirements. The Policy will be made available on the Company's external and internal websites for ease of conveyance to customers, regulators, suppliers, and third parties. The Ethics and Compliance and Legal Departments will periodically issue written communications to Westinghouse employees and intermediaries to promote awareness of and engagement with this Policy.
2. **Training:** Training will be provided to all officers, directors, employees and intermediaries to ensure awareness of the risks and understand their responsibilities for the purposes of compliance with this and related policies. To the extent you or your job requires a more detailed or in-depth understanding of this Policy and the ABC Laws; you will receive notice of additional training requirements.
3. **“Red Flags” Education:** Corrupt conduct may take many forms, and you must be alert to a wide range of situations that may create the risk of a violation of this Policy and the ABC Laws. While corruption risk factors are often specific to a given relationship, a list of common “red flags” has been created and is available on George to assist you with identifying potentially corrupt or unethical behavior.
4. **Internal controls, risk assessments and audits:** The Company's locations will implement various anti-bribery and corruption controls in accordance with this Policy; the **Westinghouse Global Policy on Gifts and Hospitality**, the **Global Travel and Entertainment Policy**, **Global Charitable Giving Policy and Procedures**, **Global Intermediary Procedure** and related procedures. In addition to the Company's regular audits, the Global Compliance Department may conduct targeted anti-corruption risk assessments in a manner proportionate to known or identifiable risk factors. Information from these activities will be used to further strengthen this Policy, its associated procedures, and the training initiatives provided.

Enforcement and Disciplinary Action

Westinghouse will impose disciplinary action on individuals found to have breached this Policy, any of the procedures referenced herein, or any other associated Procedures. The disciplinary action will be



LEGAL

Anti-Bribery and Corruption Policy

commensurate with the violation, including disciplinary action up to termination of employment to the extent permitted by law, as well as possible civil or criminal penalties. In the event a violation of this Policy also violates underlying ABC Laws, Westinghouse may refer the matter to appropriate enforcement authorities at the sole discretion of the Company.

You will not suffer adverse consequences for refusing to engage in a behavior that would violate this Policy or any associated Procedures, even if it results in the Company suffering a loss of business or a negative impact on project schedules. However, obeying the orders or directives of a superior will not excuse any such violation of the same.

The failure to report known or suspected wrongdoing may also subject an individual to disciplinary action, up to and including termination.

Reporting

You are required to be proactive and promptly report any and all actual or suspected violations of this Policy, the Procedures referenced in this Policy, or any ABC Law by the Company, an employee, or any third party to either the Chief Compliance and Risk Officer, or the General Counsel, or through the Ethics and Concerns Helpline, which is available at the following 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



LEGAL

Anti-Bribery and Corruption Policy

Softbank Telecom - 00-663-5111
Step 2: at the prompt enter 844238438011

- **South Korea**

Step 1: Dial
Dacom - 00-309-11
ONSE - 00-369-11
Korea Telecom - 00-729-11
Step 2: at the prompt enter 8442384380

- **Spain**

Step 1: Dial 900-99-0011
Step 2: at the prompt enter 8442384380

- **Sweden**

Step 1: Dial 020-799-111
Step 2: at the prompt enter 8442384380

- **United Kingdom**

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

- **Ukraine**

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

- **United States** 1-844-238-4380

- **Poland** 800-005-088

Questions and/or reports may also be presented through the helpline website at:

www.weconcerns.com

The Global Compliance organization can be reached directly at:

ethicsandcompliance@westinghouse.com

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

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



LEGAL

Anti-Bribery and Corruption Policy

Records Retention

Documentation supporting compliance with this policy must be maintained and made available for internal and external audit review. All documentation must be maintained for a period of at least five years, unless a longer period is otherwise specified in a procedure supporting this policy.

References

- BMS-LGL-16 Global Ethics Code
- BMS-LGL-22 Westinghouse Global Policy on Gifts and Hospitality
- BMS-LGL-66 Global Intermediary Procedure
- BMS-FIN-1 Global Travel and Entertainment Policy
- BMS-COM-5 Global Charitable Giving Policy and Procedures

Revision Summary

Revision	Section	Revision Description
0	All	Initial Issue
1.0	All	Update format
2.0	All	Revise policy
3.0	Interactions with Public Officials; Reporting	Delete sentence; update Korea Helpline number
4.0	Reporting	Updated phone numbers
5.0	Entertainment, Hospitality, and Gifts Reporting	Deleted sentence Updated China Helpline phone number
5.1	All	Reviewed 01/14/2021- no updates needed
5.2	Cover page	Policy owner
5.3	All	Minor updates