## Modern Slavery and Human Rights Statement<sup>1</sup>

### Section 1: Wabtec's Structure, Operations, and Supply Chain

Wabtec is a leading global provider of equipment, systems, digital solutions, and value-added services for the freight and transit rail sectors. Drawing on over 150 years of experience, we are leading the way in safety, efficiency, reliability, innovation, and productivity. Whether it is freight, transit, mining, industrial, or marine, our expertise, technologies, and people – together – are accelerating the future of sustainable transportation.

# SUSTAINABILITY PRINCIPLES When it comes to corporate sustainability, Wabtec has a three-pronged approach that includes: Innovating with purpose. We are committed to developing responsible and sustainable products that minimize our impact on the planet. **Driving responsible operations.** We are committed to providing work environments and products that enable productive and efficient use of resources. **Empowering people and** communities. We are committed to driving an inclusive culture grounded in integrity, committed to the development of and investment in the communities where our teams live and work.

At Wabtec, we are committed to creating a more sustainable freight and passenger transportation network. Because operational excellence and environmental stewardship are among our priorities, we also conduct business in a way that is sustainable for our employees, customers, and the communities in which they work and live.

You can learn more about our Environmental, Social and Governance (ESG) efforts, including our commitment to human rights, in our 2023 Sustainability Report, which is available at: <a href="https://www.wabteccorp.com/2023">https://www.wabteccorp.com/2023</a> Sustainability Report?inline.

Our headquarters are located in Pittsburgh, Pennsylvania, U.S.A, and we have offices and facilities in over 50 countries around the globe. As of December 31, 2023, we have a global workforce of approximately 27,000 employees. Wabtec is listed on the New York Stock Exchange as Westinghouse Air Brake Technologies Corporation ("WAB").

<sup>&</sup>lt;sup>1</sup> This statement is intended to meet the requirements to comply with Section 54 of the United Kingdom Modern Slavery Act 2015.

Wabtec provides products and services through two principal business segments, Freight and Transit Segment. Freight accounts for approximately 67% of Wabtec's Portfolio: From the food on our tables to the products we purchase, freight rail is part of an integrated, efficient, and cost-effective network fueling the world's economy. Today, more than 20 percent of the world's freight is moved by a Wabtec locomotive. Transit accounts for approximately 33% of Wabtec's Portfolio: At Wabtec, we provide products and services to virtually every major rail transit system around the world, supplying an integrated series of brakes, doors, and components for commuter and metro cars, as well as buses, that deliver safety, efficiency and passenger comfort. We offer an extensive array of products, from pneumatic, electronic, and hydraulic brake equipment, to HVAC and sanitation systems. Each of our products draws on our deep experience tailoring components to meet the specific needs of our customers and are manufactured using the latest technologies.

#### Section 2: Wabtec's Risk Assessment

We have used the UN Guiding Principles on Business and Human Rights to assess the risk of modern slavery in our operations and supply chains, including assessing whether we cause, contribute, or are directly linked to modern slavery.

#### **Operational Risk**

Wabtec has approximately 27,000 employees in approximately 50 countries in many different manufacturing, services, warehouse, and office locations worldwide. In support of Wabtec's operational activities, employee roles and responsibilities may include manufacturing, warehousing, logistics, field services, and support functions (e.g., HR, commercial operations).

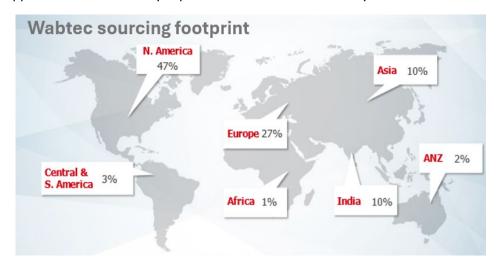
Each of Wabtec's business units and their associated locations follows Wabtec's global standards and policies for recruitment and ongoing management of staff, including full-time staff and contingent workers, except where local legal requirements require deviation from those policies or standards. Wabtec encourages a safe and compliant work environment, including providing routine employee training and maintaining an open reporting program for employees to raise concerns. Additionally, all Wabtec entities are subject to global policies and procedures addressing human rights and modern slavery, which are further described in Section 3 below.

As part of our assessment of modern slavery risk, we reviewed whistleblower and internal reports made by or in connection to Wabtec.

## **Supply Chain Risks**

Wabtec recognizes that our suppliers play a pivotal role in creating value for our customers, shareholders, employees, and the communities in which we operate. We are committed to working with our suppliers to eradicate modern slavery in Wabtec's supply chain. Notably, a significant number of suppliers to Wabtec includes its affiliated companies. These companies follow the policies, processes, and procedures described in this document. Therefore, we consider these suppliers' operational risks and supply chain risks to be low, subject to local suppliers having an inherent higher risk in jurisdictions that are more prone to modern slavery.

Wabtec's annual procurement spend for FY2023 was \$5.04B. In addition, Wabtec's suppliers have their own unique supply chains with many sub-suppliers of their own. Wabtec often has limited visibility of these sub-suppliers and whether they expose Wabtec to modern slavery risks.



Following our due diligence process, which is described below, we identified the following categories of direct and indirect suppliers that potentially expose Wabtec to modern slavery risk:



This is not an exhaustive list and may be expanded as new areas are identified during the company's risk assessment activities.

#### Section 3: Wabtec's Actions to Assess and Address Risk

Globally, Wabtec has implemented numerous policies, procedures, and practices that are leveraged to help identify and address modern slavery and human trafficking in our own business operations and supply chain. We act with integrity and treat every employee, customer, and vendor with trust and respect.

Wabtec uses the following approach to help identify and address modern slavery risk.

- (1) <u>Policies</u>: This Modern Slavery Statement continues to be supported by several policies and procedures, including our Human Rights Policy, Supplier Code of Conduct, Code of Business Conduct, and Ethics and Conflict Minerals Policy (now called Responsible Minerals Policy).
  - a. Wabtec's Human Rights Policy, issued in 2020, outlines our commitment to respecting human rights wherever we operate. Our policy and actions are guided by the UN Guiding Principles on Business and Human Rights, amongst other standards. The Human Rights Policy prohibits any form of forced, involuntary, or child labor in our operations. The Policy includes specific commitments to undertake ongoing due diligence to identify, prevent and mitigate any adverse impacts of our activities and provide access to remedies through effective reporting mechanisms. Wabtec's Human Rights Policy can be found at: <a href="https://ir.wabteccorp.com/static-files/c4d32f5a-d771-450e-8d41-196b8eb18b61">https://ir.wabteccorp.com/static-files/c4d32f5a-d771-450e-8d41-196b8eb18b61</a>
  - b. Each Wabtec business unit utilizes standard terms and conditions for suppliers, which incorporate by reference Wabtec's Supplier Code of Conduct setting specific expectations regarding suppliers' compliance with obligations in respect of sustainable sourcing, fair employment practices, environmental, health and safety (EHS), human rights, responsible mineral sourcing, working with government, improper payments, competition law, intellectual property, security, and privacy. Wabtec's current Supplier Code of Conduct can be found at: bb0dbc43-6373-4810-8ac1-1f39b8ca8ae3 (wabteccorp.com)
  - c. In 2023, Wabtec's Code of Business Conduct and Ethics ("Code of Conduct"), which outlines Wabtec's commitment to compliance, integrity, and fairness, was updated to include our new Vision, Mission, and Values, to align with our new behaviors. Our Code of Conduct, which applies to all employees and contingent workers, is the cornerstone of our Global Compliance Program and requires all personnel to behave fairly and compliantly in their dealings with customers, suppliers, other third parties, and each other. Among other things, the Code of Conduct reaffirms Wabtec's respect for human rights, links to our Human Rights Policy, and encourages employees to raise concerns about suspected human rights violations in our supply chain. Wabtec's Code of Conduct can be found at: https://ir.wabteccorp.com/static-files/fe76c10c-8311-4f5d-94d6-4ae16fbe98ff.
  - d. Wabtec's **Responsible Minerals Policy** outlines our commitment to avoiding and eliminating the use of minerals that directly or indirectly finance or benefit armed groups in the Democratic Republic of Congo or adjoining countries. Wabtec has guidelines that outline the procedure to implement and operationalize the Responsible Minerals Policy, including conducting Supply Chain Due Diligence. If legacy suppliers are deemed to have product risk tied to conflict minerals or other rare earth minerals, they are required to commit to and implement a corrective action plan within a reasonable timeline. Wabtec's new vendor management system allows for coordination with any new supplier to ensure that they understand Wabtec's responsible sourcing policy and compliance requirements, the requirements of the Conflict Minerals Rule, and the OECD Guidance, while also collecting CMRTs from suppliers before they are initiated into the supply chain. This helps Wabtec

more proactively identify, assess, and respond to supply chain risks. Further, Wabtec reserves the right to conduct audits to ensure compliance with its Supplier Code of Conduct, applicable laws and regulations, and the Responsible Minerals Policy. In 2023, the Responsible Minerals Policy was updated to include other rare earth minerals (including mica). Wabtec's current Responsible Minerals policy can be found at: <a href="https://ir.wabteccorp.com/static-files/eb2e79c0-1128-4ffd-9d1f-3425302bdc54">https://ir.wabteccorp.com/static-files/eb2e79c0-1128-4ffd-9d1f-3425302bdc54</a>.

- (2) <u>Processes, Procedures and Standards</u>: Our policies continue to be supported by processes, procedures, and standards to help prevent modern slavery from occurring within our supply chain.
  - a. Open Reporting Program Wabtec and its business units have an open reporting system Speak Up Wabtec! that allows employees and third parties to report concerns about policy violations, including concerns about modern slavery. Speak Up Wabtec! is hosted by a third-party hotline provider, Navex Global, which offers a multilingual, confidential, and anonymous means of reporting concerns in over 50 countries. Wabtec expects employees to promptly report misconduct and integrity concerns through any of our open reporting channels, including managers, HR, Legal, and Compliance teams, or by emailing speakupwabtec@wabtec.com. Employees also can anonymously raise concerns by using the Speak Up Wabtec! E-tool, or by calling the Speak Up Wabtec! Hotline. International hotline numbers for over 50 countries are also available via the e-tool. These contact details are included in our Supplier Code of Conduct, which is available on our website, incorporated into standard terms and conditions with suppliers, and provided to all new suppliers. Our program seeks to address concerns promptly, thoroughly, and fairly. Wabtec does not tolerate any form of retaliation against employees, contractors, or sub-contractors for reporting.
  - b. Responsible Supplier Assessment Practices Based on business risk assessments, there are a variety of supplier assessment tools used by Wabtec to evaluate compliance with human rights practices, including onboarding questionnaires, desktop supplier assessments, as well as periodic onsite supplier audits in High-Risk Countries pursuant to the Wabtec Freight Equipment & Service's Responsible Supplier Assessment Policy. High-Risk Countries are defined as countries which have been deemed to have weak or limited controls and/or measures to prevent non-compliance with international standards for human rights or other labor protections. This definition incorporates country-specific information and data from governmental, international NGO, and industry standards related to human rights risks.

In 2023, Wabtec continued to implement a new onboarding tool called HICX. This tool allows Wabtec to collect modern slavery information from its suppliers at the time of onboarding. This tool also allows for suppliers to provide any updated information around modern slavery within the tool with no need for a yearly survey campaign.

Wabtec continues to implement a Supply Chain Risk Management tool, introduced in 2021, to enhance our understanding of risks to our supply chain. Realtime monitoring on over 75 different indicators allows additional visibility into key supplier areas such as fair labor practices and human rights, environmental law, and regulatory and legal activities.

- (3) <u>Governance</u>: Our governance framework guides decision-making around how we operate, innovate, and drive growth. This governance framework starts with Wabtec's Board of Directors and its committees who oversee the execution of the company's environmental, social, and governance (ESG) strategy as part of their oversight of Wabtec's overall business. As mentioned above, details of Wabtec's 2023 Sustainability Report can be found at <a href="https://www.wabteccorp.com/2023">https://www.wabteccorp.com/2023</a> Sustainability Report?inline. Moreover, the implementation of programs, policies, and procedures to assess and address ESG risks such as modern slavery is coordinated by a cross-functional team of regional and subject matter experts. Specifically, Wabtec's program to address modern slavery is coordinated by members of the Sourcing Compliance, Supplier Quality, Human Resources, Environmental, Health, and Safety, and Legal teams.
- (4) <u>Terms and Conditions</u>: Each Wabtec business unit utilizes standard terms and conditions, which incorporate by reference Wabtec's Supplier Code of Conduct. Suppliers, where they accept Wabtec's standard terms and conditions, are contractually obligated to adopt policies to address human rights (including sustainable sourcing, fair employment practices, environment, health and safety (EHS), security and privacy). Wherever possible, Wabtec seeks contractual rights to audit supplier's compliance and can terminate the relevant contract in the event of material non-compliance.
- (5) <u>Enterprise-level communication</u>: Wabtec acknowledges that our ability to mitigate and combat modern slavery strongly depends on our employees' ability to identify, escalate, and/or address human rights and modern slavery issues. Wabtec, via periodic all-employee communications, reinforces Wabtec's commitment to Human Rights and further instructs employees to, among other things, "not condone and strive to eliminate all forms of forced, prison or indentured labor, slavery, human trafficking, and child labor." The Wabtec Code of Conduct, referenced above, is available in English and multiple other languages. Employees are required to acknowledge that they have received, read, and understood the Code of Conduct. Further, Wabtec is providing Code of Conduct training to all employees.
- (6) <u>Restricted Party List (RPL) Screening:</u> Wabtec screens its suppliers against a RPL database to ensure that we are not dealing with a supplier with whom we are legally prohibited from doing business, including entities that may have been sanctioned for engaging in modern slavery. Any supplier that is flagged through this screening process will be subject to additional due diligence and (where necessary) be replaced with an alternate supplier. Wabtec continues to run its list of suppliers against this database on a rolling basis to ensure no new risks are added to the supplier pool.

#### **Supplier Risk Assessment and Mitigation**

Wabtec conducts risk assessments regarding modern slavery and human rights risks with respect to its supplier population. This assessment is ongoing, and we are working with our suppliers to ensure that modern slavery policies are in place.

## Section 4: Assessing the Effectiveness of Wabtec's Actions

Lastly, Wabtec continues to measure our program effectiveness, including but not limited to:

- (1) Measuring the number of the suppliers surveyed or audited;
- (2) Tracking to closure any significant red flags raised through the RPL screening;
- (3) Terminating the relationships with suppliers with significant non-compliance;
- (4) Tracking the number of concerns raised regarding modern slavery or human rights;
- (5) Measuring the penetration of our supplier contract terms and conditions addressing modern slavery and human rights; and,
- (6) Documenting any specific findings tied to red flags, supplier corrective actions tracked to closure, and suppliers exited due to continued non-compliance with Wabtec's Human Rights Policy.

During the reporting period, we progressed the initiatives that we had set out to achieve in 2023, namely, the updating of our Supplier Code of Conduct and Code of Conduct, implementing HICX and updating our Responsible Minerals Policy.

In 2024, our ongoing efforts to better understand our potential connection to modern slavery risks will include the following initiatives:

- continuing to implement the onboarding tool (HICX), reviewing the information collected from suppliers in relation to modern slavery and prioritizing the actions arising from the results of the review;
- (2) implementing a new sustainability assessment tool for suppliers. This tool will be used to gather information from the supplier on modern slavery policies/procedures. Results generated from the tool will also be used in Wabtec's Supplier Selection Matrix for some sections of the business. The tool automatically generates scores based on each supplier's assessment responses;
- (3) continue to find ways to simplify the surveying process with suppliers to drive better response rates in order to help us better understand where modern slavery risks lie with our suppliers; and
- (4) develop a bespoke modern slavery training program for the Sourcing team and front-line managers to equip them to identify potential red flags and respond appropriately.

#### Section 5: Remediation

Wabtec's Modern Slavery program recognizes the importance of taking steps to identify and remediate any findings or concerns identified during our supply chain due diligence.

- (1) **Prompt and Thorough Investigation of Concerns Raised:** Wabtec employees and external stakeholders are encouraged to raise any concerns through multiple open reporting channels, including our open reporting hotline, "**Speak Up Wabtec!**", that is available in local languages and is administered through a third-party. Any form of retaliation against concern raisers is prohibited. Wabtec seeks to investigate all concerns promptly and objectively in accordance with its investigation protocols. If a violation by a supplier is confirmed, Wabtec will, where possible, use its leverage to encourage the supplier to take corrective action or an alternative supplier will be identified.
- (2) <u>Training and Awareness</u>: Training and awareness are key controls in remediating modern slavery and human trafficking red flags. We recognize the need to build the capability of our employees, particularly, our Sourcing team and front-line managers, to not only identify potential red flags of modern slavery

and human trafficking but also to take the required actions to respond appropriately. Modern Slavery training has been conducted and completed through Wabtec Corporation's training module, called Wabtec Learning Management System. It was assigned to all Sourcing employees globally. Future training is being created to ensure annual training for all Sourcing employees. Additionally, key stakeholders and management (including the Sourcing and Human Resources teams) are routinely updated on human rights obligations in our global operations and supply chain.

- (3) <u>Industry Engagement</u>: Wabtec is a member company of Railsponsible, an industry initiative focused on sustainable procurement, with the aim of continuously improving sustainability practices throughout the railway industry supply chain. The initiative aims to improve environmental and social practices of companies across the rail supply chain through best practice sharing and capability building. Railsponsible is an important vehicle through which Wabtec engages and collaborates with industry leaders in areas such as sustainable procurement. Wabtec also is a member of the Responsible Minerals Initiative.
- (4) <u>Continuous improvement</u>: We continue to evaluate supplier responses as they are received. In addition, we seek to expand the scope of suppliers that are surveyed year on year. At a minimum:
- (i) we seek to engage with suppliers highlighted as a potential risk. Wabtec will provide them with feedback on our expectations of their policies, procedures, controls, and gaps observed based on their responses or Wabtec's assessments.
- (ii) if a significant risk is identified, we will work with the supplier to develop a remediation plan which may include a site audit. If the supplier is unwilling to change in order to mitigate risk or any actual impacts/findings, or use their best endeavors to mitigate the risk and this fails, then Wabtec will seek alternative suppliers.

## **Section 6: Process of Consultation**

All Wabtec entities operate under a common set of governance policies and programs. This includes the programs through which modern slavery risks in our operations and our supply chains are assessed and addressed. A consultation process has been undertaken across Wabtec to help guide the drafting of this statement. This included engagement with the following functions (which each have global responsibility): Compliance, Legal, Human Resources, Sourcing; relevant Wabtec General Managers and relevant Executive Leadership Team members.