

TECO-Westinghouse Motor Company (TWMC) Supplier Transparency Policy

As of January 1, 2012, the California Transparency in Supply Chains Act of 2010 (SB 657) required large retailers and manufacturers that have gross worldwide sales of over one hundred million dollars (\$100,000,000) and do business in the state of California to be transparent about the efforts they have taken to eliminate Slavery and Human Trafficking from their supply chain.

Supplier Adherence to Applicable Laws and TWMC's Policy

Under TWMC's terms & conditions with suppliers, suppliers are required to comply with all applicable federal, state, local, and municipal laws and regulations, including rules, regulations, orders, conventions, ordinances and standards, that relate to the hiring, wages, hours and conditions of employment, discrimination, and occupational health or safety and all other applicable labor and other workplace laws and regulations. Further, per TWMC's contracts, suppliers are obligated to comply with TWMC's policies, or an equivalent policy, which requires suppliers to utilize only legal and ethical means in conducting their business. Acceptance of TWMC's contracts constitutes certification by suppliers that the products and services they provide comply with all applicable laws and regulations. Violation of these obligations is grounds for termination of any business relationship.

Supplier Assessment, Audit, and Accountability

TWMC has implemented, and follows, processes and policies that govern initial evaluation and continuing reviews of suppliers. As part of these processes, TWMC uses internal resources to evaluate various risks, including risks of violation of human rights. Certain suppliers are audited by TWMC and such audits may include unannounced visits as well as third party evaluation of supplier's compliance with TWMC's policies. TWMC conducts internal audits to ensure compliance with our processes and policies and address any audit findings in prompt and decisive manner.

Training

TWMC requires 100% of employees to complete training of TWMC's Code of Ethics and to acknowledge compliance with these standards. In addition, supply chain employees who manage these processes are trained on how to identify and mitigate risks in their sourcing decisions.

4/22/15

