NATIONAL STEEL CAR LIMITED
P.O. BOX 2450
HAMILTON, ONTARIO L8N 3J4

WHISTLEBLOWER POLICY

1. Policy Statement

National Steel Car (NSC or the Company) is committed to fostering a workplace culture grounded in integrity, transparency, accountability, and compliance with all applicable laws and regulations. This Whistleblower Policy provides employees, contractors, and stakeholders with a safe, confidential, and accessible mechanism to report suspected wrongdoing, unsafe practices, or violations of internal policies, legal obligations, or ethical standards.

The Company encourages all individuals to report concerns in good faith, knowing they will be protected against retaliation, even if their concerns are ultimately unsubstantiated.

This policy aligns with Ontario laws, including the Occupational Health and Safety Act (OHSA), Employment Standards Act, 2000, and Human Rights Code. It supports the Company's obligations to maintain a safe, respectful, and compliant workplace.

2. Key Objectives

The objectives of this policy are to:

- Encourage timely reporting of unsafe practices, misconduct, or violations without fear of retaliation.
- Protect whistleblowers from retaliation of any form, including intimidation or adverse treatment.
- Provide accessible, confidential, and anonymous reporting channels to ensure all individuals can raise concerns safely.
- Ensure transparent, consistent, and fair processes for investigating and responding to reports.
- Strengthen NSC's occupational health and safety (OHS) culture and ethical business practices through accountability at all levels.

3. Scope of Policy

a. Covered Individuals

This policy applies to:

- All employees (full-time, part-time, seasonal, unionized, and non-unionized)
- Contractors, consultants, and temporary agency staff
- Suppliers, vendors, and other third-party service providers operating on or off-site on behalf of the Company

b. Covered Concerns

Concerns include, but are not limited to:

- Unlawful or unethical conduct (fraud, bribery, falsification of records)
- Workplace misconduct (harassment, discrimination, bullying, violence, intimidation)
- Health and safety violations, such as:
    - Unsafe practices
    - Failure to report incidents or hazards
    - Intimidation or retaliation for raising safety concerns
    - Concealment of accidents or near misses
- Financial misconduct (embezzlement, theft, improper accounting)
- Regulatory breaches (environmental, safety, or compliance violations)
- Conflicts of interest (self-dealing, undisclosed relationships, inappropriate gifts)

A reasonable suspicion or good-faith belief is sufficient to file a report. Proof of wrongdoing is not required.

4. Confidentiality and Anonymity

- Reports may be submitted anonymously or confidentially through the channels provided.
- Confidentiality will be maintained to the fullest extent possible, consistent with the need to conduct a fair and thorough investigation.
- Whistleblowers are not required to provide identifying information; withholding it will not limit the validity of the report.
- The Company is committed to preserving and protecting anonymity and confidentiality to ensure individuals feel safe and supported when raising concerns.

5. Reporting Mechanisms (Confidential & Anonymous)

To facilitate safe, secure, and accessible reporting, NSC provides multiple confidential and anonymous channels through which concerns may be raised. These mechanisms are designed to ensure that individuals can report without fear of retaliation or compromise of confidentiality.

a. Anonymous Hotline

A dedicated toll-free hotline is available 24/7: 1-800-501-9737

- Operated by an independent third-party service provider to ensure anonymity and confidentiality.
- Caller ID is not recorded, and anonymity is preserved unless voluntarily waived by the caller.

b. Online Reporting Portal

A secure online reporting system is available at: **www.report4nsc.com.**

- Contact information is optional, and individuals may choose to remain anonymous.
- Reports are encrypted and forwarded confidentially for investigation.

c. Written Reports

Reports may be submitted via a signed or anonymous letter to:

National Steel Car
Attention: VP of Human Resources
600 Kenilworth Ave. North, P.O. Box 2450
Hamilton, Ontario, L8N 3J4

All written reports will be handled discreetly, logged confidentially, and investigated promptly.

d. In-Person Reporting

- Employees may request a confidential meeting with the Vice President of Human Resources.
- Meetings will be private, and all records will be securely maintained.
    - Phone: 905-544-3317; Extension 3056
    - Email: NSCethics@steelcar.com

e. Union Representative Reporting

- Unionized employees may also choose to report concerns directly to their designated Union Representative.
- Union Representatives may submit reports on behalf of employees through any of the mechanisms outlined above. Reports raised in this manner will be treated with the same seriousness, confidentiality, and protections as those made directly.

All reports will be handled discreetly and documented confidentially.

6. Investigation Procedures

All reports will be:

1. **Acknowledged** (where contact details are available)
2. **Preliminarily reviewed** to assess credibility and scope
3. **Investigated** with impartiality and consistency, potentially involving:
    - Internal departments (HR, Safety, Security)
    - Independent auditors or investigators for serious allegations

4. **Resolved** with appropriate corrective or disciplinary action
5. **Communicated** (where permissible) back to the whistleblower

Investigations will follow a staged, time-bound process to ensure transparency and efficiency.

7. Anti-Retaliation Protections

- **Retaliation of any kind is strictly prohibited** against individuals who make a report in good faith, cooperate with an investigation, or refuse to participate in suspected wrongdoing.
- Prohibited retaliation includes, but is not limited to: termination, demotion, salary or benefit reductions, denial of promotion, threats, harassment, intimidation, or any other adverse treatment.
- Any employee, manager, or supervisor found to have engaged in retaliatory conduct will be subject to disciplinary action, up to and including termination of employment.
- These protections apply even if the report is later determined to be mistaken, provided it was made in good faith.

8. Communication and Training

Awareness and Rights:

All employees will be informed of their rights and responsibilities under this Whistleblower Policy, including how to report concerns, protections against retaliation, and expectations for responding to reports constructively.

Training Programs:

- Training on the Whistleblower Policy will be provided during employee onboarding and through regular refresher sessions.
- Training will cover reporting mechanisms, confidentiality protections, anti-retaliation measures, and examples of appropriate workplace responses to concerns.
- Supervisors and managers will receive additional guidance on how to handle reports in a constructive, non-retaliatory manner.

Communication Approach:

- A formal communication and change management plan will be developed to support the introduction of this policy and the continued evolution of workplace OHS culture.
- Communications will be tailored to the workforce, prioritizing in-person communication by senior management and supervisors where appropriate.
- Supporting materials (posters, handouts, and toolbox talks) will be used to reinforce awareness and encourage ongoing dialogue.

Accessibility and Language Inclusion:

- To ensure accessibility for all workers, the Whistleblower Policy documentation and training materials will be translated into the 1–3 most common languages spoken on-site.
- Where appropriate, training will be delivered by same-language trainers or interpreters to ensure comprehension among employees with limited English proficiency.

9. Monitoring and Review

- Use of the Whistleblower Policy is tracked to assess effectiveness, with reviews conducted at an established cadence.
- Each review will typically include a dated and signed attestation confirming that the policy has been reviewed by the appropriate executive committee.

10. Commitment Statement

NSC encourages all stakeholders to report concerns openly and without fear of reprisal.

Your voice matters.
You are protected.
You are heard.