



## GREENBRIER SUPPLIER CODE OF CONDUCT

The Greenbrier Companies, Inc., which includes all of its subsidiaries, affiliates and operations worldwide (collectively "Greenbrier"), is committed to the highest standards of ethical business conduct. As a condition of doing business with Greenbrier, all Suppliers (suppliers, vendors, contractors, sub-contractors, consultants, agents and other providers of products, materials and services) must fully comply with all applicable international, federal, state and local laws and regulations, whether set forth in a contract or a purchase order, as well as this Supplier Code of Conduct.

### **Ethics and Laws**

*Compliance with Code-* Suppliers must fully comply with this Supplier Code of Conduct as a condition of doing business with Greenbrier.

*Compliance with Laws-* Suppliers must fully comply with all laws and regulations applicable to the operation of their businesses and in their relationships with Greenbrier in all countries in which they do business with Greenbrier.

*Books and Records/Financial Integrity-* Suppliers must maintain books, records and accounts that accurately and completely reflect all transactions related to Greenbrier business.

*FCPA and Global Anti-bribery/Anti-corruption Laws-* Suppliers must comply with and not violate the U.S. Foreign Corrupt Practices Act ("FCPA") and all anti-bribery and anti-corruption laws and regulations in the countries in which they operate and do business with Greenbrier. This requirement includes that Suppliers are prohibited from paying, offering or receiving any bribes, kickbacks or anything of value to or from government officials, or Greenbrier employees or their relatives, to obtain or retain business, or to obtain any improper advantage, or from participating in any fraud, theft, embezzlement or similar activities.

*Gifts, Meals, Travel and Entertainment-* Suppliers may not provide any non-customary or unreasonable gifts, meals, travel or entertainment to any Greenbrier employee or relative with the intent of improperly influencing any transaction or to obtain or retain business with or from Greenbrier. Any customary gift, meal or entertainment must be reasonable and of a kind offered by the Supplier to others.

*Quality-* Suppliers must ensure that all products, materials and services supplied to Greenbrier are safe and meet all applicable quality standards. Suppliers must also have quality assurance processes to detect, communicate to Greenbrier and correct defects in order to ensure delivery of products, materials and services that meet or exceed contractual quality, legal and regulatory requirements. Suppliers also agree to allow Greenbrier access to any of their facilities to verify that their material conforms to specified requirements.

*Conflicts of Interest-* Suppliers must avoid conflicts of interest in their business dealings with Greenbrier. Any potential conflicts of interest, or the appearance of a conflict of interest, must be disclosed, in writing, to Greenbrier. This includes a prohibition of consulting or

communicating with other suppliers, bidders, potential bidders, or Greenbrier personnel outside of the supplier-customer relationship, on proposals, prices or bids.

*Fair Competition-* Suppliers must compete fairly in the marketplace and on the basis of the merits of their products, materials and services, and must not engage in any deceptive or unfair market practices, anti-competitive behavior or violation of antitrust laws.

*Trade Compliance-* Suppliers must conduct all business with Greenbrier in compliance with all applicable laws and regulations governing (1) exports, re-exports and retransfers of goods, material, technical data, software and services, (2) imports of goods, (3) customs laws, (4) economic sanctions and embargoes and (5) anti-boycott requirements, of any country in which Suppliers and Greenbrier do business.

### **Safe and Responsible Workplaces and Labor Practices**

*Environmental, Health and Safety-* Suppliers must comply with all applicable environmental, health and safety laws and regulations, and ensure safe and healthy work environments for their employees and for Greenbrier employees on any premises in which a Supplier does work.

*Respect and Dignity/Non-discrimination and Non-harassment-* Suppliers must treat their employees and Greenbrier employees with respect and dignity, and must not engage in any harassment (including sexual harassment), bullying or discrimination based on any legally-protected characteristic, including but not limited to race, ethnicity, creed, color, religion, sex/gender, age, national origin or ancestry, veteran/military status, sexual orientation or gender identity or expression.

*Commitment to Supplier Diversity-* As part of our IDEAL (Inclusion, Diversity, Equity, Access, and Leadership) commitment, Greenbrier is dedicated to creating mutually beneficial business relationships with diverse suppliers that strengthen the communities in which we operate. As part of our commitment, we strive to give all suppliers equal opportunities to do business with Greenbrier. It is our desire to purchase materials, goods, and services from diverse suppliers to enhance the efficient performance of our business. We know that partnering with suppliers who provide innovative ideas in addition to supporting our operations globally will yield significant competitive advantage. We strongly encourage companies and individuals' doing business with Greenbrier to share in this commitment by building a diverse workforce, and fostering relationships with, and purchasing from, diverse suppliers.

*Acceptable Working Conditions-* Suppliers must provide safe and hygienic working conditions to all of their workers.

*Minimum Living Wages and Maximum Working Hours-* Suppliers must pay workers at least the minimum living wages required by local law and/or any applicable collective bargaining agreement, and provide all legally-mandated benefits, including overtime at such premium rate as is legally required, and on a timely basis. We further expect Suppliers to provide their employees with regulated hours of work, not exceeding the maximum working hours prescribed by local law, including daily and weekly rest periods, and vacation or annual leave.

*Freedom of Association and Collective Bargaining-* Suppliers are expected to respect their employees' right to join, form or not join a labor union. Where employees have exercised this

right and are represented by a legally-recognized union, Suppliers must commit to work with the union's chosen representatives, without fear of reprisal, intimidation or harassment.

*Disciplinary and Grievance Mechanisms-* We expect Suppliers to have employee disciplinary processes to address concerns regarding employee work, conduct or absences, and grievance mechanisms to raise workplace problems or concerns or to appeal disciplinary decisions.

### **Responsible Sourcing and Supply Chains**

*Prohibition of Forced Labor-* Suppliers must conduct their businesses and supply and sourcing chains in a responsible manner, consistent with prevailing international human rights standards and Greenbrier's Human Rights Policy, including the prohibition of the use of underage or forced labor/modern slavery or human trafficking.

*Environmentally and Socially Responsible Sourcing-* We strongly encourage Suppliers to source materials from environmentally and socially responsible sources. Suppliers must refrain from supplying "conflict minerals" from any of the Covered Countries as described in more detail in our Conflict Minerals Policy.

### **Information and Asset Protection**

*Confidential Information and Information Security-* Suppliers must take proper care to protect Greenbrier's sensitive information, including confidential, proprietary and personal information, and must never use any such information for any purpose other than the business purpose for which it was provided.

*Intellectual Property and Trademarks-* Suppliers must respect the legitimate proprietary rights and intellectual property rights of Greenbrier and others, including engineering designs, trademarks, copyrights, brand names, logos or other intellectual property or assets.

### **Reporting, Governance and Prohibition of Retaliation**

Greenbrier is committed to providing an honest, ethical and transparent business environment for all Suppliers. This includes an expectation that our Suppliers report to us any suspected incidents of possible violations of this Supplier Code of Conduct. Accordingly, Suppliers should contact Greenbrier, either directly, at [ChiefComplianceOfficer@gbx.com](mailto:ChiefComplianceOfficer@gbx.com), or through Greenbrier's external compliance hotline, [www.greenbrier.ethicspoint.com](http://www.greenbrier.ethicspoint.com) (either anonymously or by identifying themselves), if they suspect a violation of this Code, or any other instance of unethical behavior related to the Supplier doing business with Greenbrier. Greenbrier has a strict policy and practice prohibiting retaliation for any report of suspected violations that is presented in good faith.

**Originally adopted December 2017  
Reviewed and revised October 2022**