



## **GREENBRIER HUMAN RIGHTS POLICY**

The Greenbrier Companies, Inc. ("Greenbrier") is committed to respecting the rights of all people while serving our customers, employees, shareholders and communities in a reliable and conscientious way.

### **Discrimination and Harassment**

We value diversity and are committed to equal opportunity in a workplace free of discrimination and harassment. Consistent with Greenbrier's Equal Employment Opportunity and Affirmative Action Policy Statement, Greenbrier prohibits any type of discrimination or harassment based on their actual or perceived race, religious creed, color, national origin, ancestry, physical disability, mental disability, medical condition, genetic information, marital status, sex (including pregnancy, childbirth, lactation and related medical conditions), gender, gender identity, gender expression, age, sexual orientation, military, veteran or Civil Air Patrol status, or any other characteristic protected under applicable federal, state or local law. Qualifications, skills, experience and performance are the basis for recruitment, hiring, placement, training, compensation and advancement.

### **Workplace Health, Safety and Security**

We are committed to the ongoing health and safety of our employees and recognize it as our number one priority. We will comply with all applicable safety and health laws, regulations and requirements. We are constantly working to ensure a safe workplace by minimizing the risk of accidents, injury and exposure to health risks. We are committed to engaging with our employees on health and safety, and have dedicated safety resources assigned to each operating facility. Greenbrier ensures that managing our safety processes is an enterprise-wide activity, and is committed to continually improve health and safety in our workplaces, including the identification and remediation of health and safety concerns. Greenbrier maintains workplaces free from harassment, intimidation, violence and other unsafe or disruptive conditions, both internal and external.

### **Working Hours, Wages and Benefits**

Greenbrier will comply with all applicable laws governing the payment of wages and benefits to employees and will provide compensation and benefits to employees that are fair and competitive for the industry.

### **Freedom of Association and Collective Bargaining**

At Greenbrier we respect our 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, we are committed to working constructively with their chosen representatives. We are committed to bargaining in good faith with such representatives and to allowing our employees to exercise their rights without fear of reprisal, intimidation or harassment.

## **Prohibition of Forced and Child Labor**

Greenbrier prohibits the use of all forms of forced or involuntary labor, including forced, bonded, indentured or involuntary prison labor. No corporal punishment, threats of violence or other forms of physical, sexual, psychological or verbal abuse will be tolerated. Greenbrier prohibits the hiring of individuals under the age of 18 or the compulsory schooling age or local legal minimum working age, if higher. If approved by the Company, and in compliance with applicable laws, workers younger than this may be employed through short-term internships or work experience programs. Workers in such programs are not permitted to do work that may threaten their health and safety, or hinder their education or vocational training.

## **Prohibition of Human Trafficking/Responsible Sourcing and Supply Chain Practices**

We are committed to conducting our business in a lawful and ethical manner, and to responsible sourcing and supply chain practices, and we expect the same from our suppliers. As part of this commitment, we prohibit and have no tolerance for slavery, coercive labor practices or human trafficking at Greenbrier or in our supply chain. We expect any employee or supplier who knows of or suspects a violation of these principles and prohibitions to report such violation or suspicion, and we have established procedures that allow employees and suppliers to make such reports in person, in writing or anonymously. We have adopted a number of policies and/or disclosures regarding lawful and ethical sourcing and supply chain practices, including:

- Code of Business Conduct and Ethics (<https://investors.gbrx.com/corporate-governance>)
- Policy on Coercive Labor Practices (<https://www.gbrx.com/media/2459/greenbrier-policy-on-coercive-labor-practices.pdf>)
- Supplier Code of Conduct (<https://www.gbrx.com/media/2294/greenbrier-supplier-code-of-conduct-december-2017.pdf>)
- California Transparency in Supply Chains Act of 2010 Corporate Disclosure (<https://www.gbrx.com/media/2458/disclosure-california-transparency-in-supply-chains-act-of-2010.pdf>)
- Conflict Minerals Policy (<https://www.gbrx.com/media/2290/conflict-minerals-policy.pdf>)

## **Reporting**

We encourage all employees to report violations of this Policy by contacting their manager or supervisor, Human Resources manager, the Greenbrier Legal Department or Greenbrier's EthicsPoint reporting resource (available online and via telephone). Retaliation against an employee for reporting an issue in good faith is a violation of Greenbrier policy. We also encourage suppliers to report to us any suspected incidents of possible violations of Greenbrier's Supplier Code of Conduct, either directly, at [ChiefComplianceOfficer@gbrx.com](mailto:ChiefComplianceOfficer@gbrx.com), or to the EthicsPoint resource (either anonymously or by identifying themselves).

## **Application of Policy**

This Human Rights Policy applies globally to all Greenbrier employees and contractors, in all company operations regardless of geographic location. Failure to adhere to this

Policy may result in disciplinary action, up to and including termination of employment. We also expect all of our partners, suppliers and vendors to adhere to these human rights policy standards.

**Alignment with Greenbrier Principles and Support of International Conventions**

This Human Rights Policy aligns with our principles and values, our Code of Business Conduct and Ethics, and the aforementioned policies and disclosures. We support the principles contained in the UN Universal Declaration of Human Rights, the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights.

**Adopted March 2020; last reviewed March 2021**