

		Whistleblower	
Region	Global	Policy #	HR1411
Department	Human Resources	Revision Date	January 2024

Purpose:

The purpose of the Whistleblower Policy is to encourage and enable employees and others to raise serious concerns so Loram can address and correct inappropriate conduct and actions. This policy applies to all employees of Loram Maintenance of Way, Inc. or companies of Loram Maintenance of Way, Inc. (Loram).

Our Responsibility:

The Human Resources Department is responsible for ensuring adherence to this policy, through appropriate administration and coordination with management.

The employee's manager is responsible for ensuring adherence to this policy.

Your Responsibility:

The employee is responsible for ensuring adherence to this policy and reporting concerns about violations of Loram's code of ethics or suspected violations or law or regulations that govern Loram's operations.

Whistleblower Plan of Action:

Loram requires officers and employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of Loram, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

A whistleblower as defined by this policy is an employee of Loram, who reports an activity that he/she considers to be illegal or dishonest to one or more of the parties specified in this Policy. The whistleblower is not responsible for investigating the activity or for determining fault or corrective measures; appropriate management officials are charged with these responsibilities.

Examples of illegal or dishonest activities are violations of federal, state, or local laws; billing for services not performed or for goods not delivered; and other fraudulent financial reporting.

Loram has an open-door policy and suggests that employees share their questions, concerns, suggestions, or complaints with their supervisor. If you are not comfortable speaking with your supervisor or you are not satisfied with your supervisor's response, you are encouraged to speak with your Human Resources Business Partner, Director of HR, or the Vice President of HR. Supervisors and managers are required to report complaints or concerns about suspected ethical and legal violations in writing to the Human Resources Business Partner, Director of HR, or the Vice President of HR, who has the responsibility to investigate all reported complaints.

Employees with concerns or complaints may also submit their concerns to a third-party whistleblower network, Navex Global. Concerns may be submitted to Navex Global via phone or online.

All reports of illegal and dishonest activities related to financial matters will be promptly submitted to the CEO. All other items will be directed to the Vice President of Human Resources. Both will be responsible for investigating and coordinating corrective action.

Acting in Good Faith:

Anyone filing a written complaint concerning a violation or suspected violation must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation. An employee who intentionally files a false report of wrongdoing will be subject to discipline up to and including termination.

No Retaliation:

It is contrary to the values of Loram for anyone to retaliate against any board member, officer, employee, or volunteer who in good faith reports an ethics violation, or a suspected violation of law, such as a complaint of discrimination, or suspected fraud, or suspected violation of any regulation governing the operations of Loram. An employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment.

Any whistleblower who believes he/she is being retaliated against must contact the Human Resources Business Partner or Director immediately. The right of a whistleblower for protection against retaliation does not include immunity for any personal wrongdoing that is alleged and investigated.

Confidentiality:

Insofar as possible, the confidentiality of the whistleblower will be maintained. However, identity may have to be disclosed to conduct a thorough investigation, to comply with the law and to provide accused individuals their legal rights of defense.

Disclaimer:

Loram adheres to a policy of non-discrimination and equal opportunity. This policy is applied without regard to race, color, religion, gender, sexual orientation, gender identity or expression, national origin, age, genetic information, disability, or veteran status.

All policies are subject to change at any time and with or without notice.