



# Belt Railway Company of Chicago

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## WHISTLEBLOWER POLICY

The Belt Railway Company of Chicago (BRC) is committed to fostering a workplace conducive to open communication regarding the Company's business and operating practices and to protecting employees from unlawful retaliation and discrimination for reporting unlawful conduct. The BRC is committed to operating in compliance with all applicable laws, rules, and regulations.

If an employee has a reasonable belief that an employee or the Company has engaged in any action that violates any applicable law or regulation, including, but not limited to, conduct which the employee reasonably believes constitutes a violation of federal law, rule or regulation relating to railroad safety or security, or a hazardous railroad safety or security condition, the employee may submit a written or verbal complaint to General Counsel, Secretary, and Director of Human Resources of the Company.

The employee also has the option of using the BRC Ethics Hotline to report business conduct issues. Access to the hotline is provided for employees allowing submission of concerns by both telephonic and electronic means.

It is requested that all verbal complaints also be submitted in writing, to help facilitate the investigation process.

If the General Counsel, Secretary, and Director of Human Resources is the subject of the complaint, the report will be made to the President.

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Reports made under this policy will be investigated promptly. In conducting its investigation, the Company will strive to handle the report in as confidential manner as is possible, consistent with the need to conduct an adequate investigation. Further information on reporting and investigating reports can be found in the company's Internal Control Plan (ICP), a copy of which is posted at the BRC General Office Building.

## **No Retaliation**

Retaliation against an individual for making a complaint under this policy is strictly prohibited by BRC policy.

If an employee believes he or she is being retaliated against he/she should immediately report the matter to any of the persons responsible for receiving harassment or intimidation concerns under this policy.

Reports determined to be made in bad faith, or maliciously and/or knowingly to be false, may be subject to discipline up to and including termination.