



# SUPPLIER CONDUCT GUIDE

# A Message to Our Suppliers

We appreciate your continued support as we work together to maintain the highest ethical standards in our business practices. We hold our business partners in the highest regard; and we hope that increasing awareness of our commitment to ethics will contribute to our business relationships remaining positive and productive in the future.



**Tom Wells**, President & CEO



# TTX maintains a culture of ethics and compliance

...as demonstrated by its Code of Conduct and various policies and procedures that expressly disapprove of its employees engaging in unethical or illegal behavior. Forms of prohibited conduct and active measures TTX undertakes to maintain our high ethical standards are detailed as follows.

## CONFLICTS OF INTEREST

No employee shall engage in a business transaction where there is a conflict of interest that results in the employee acting in a manner that is other than in the company's best interest. In order to avoid the appearance of impropriety, employees should avoid engaging in business with close personal friends or relatives, accepting gifts or favors from companies or individuals doing business with TTX and TTX business partners, accepting a personal benefit given because of their professional position, or retaining a benefit on terms that are not available to the general public.

## GIFTS, ENTERTAINMENT & PROHIBITED PAYMENT

No payment, fees, gifts of cash or non-cash items, or gratuities may be made to, or received from, any customer, supplier, government official, or any other person or entity with which TTX does business with the intent of improperly influencing any transaction. Accepting these types of prohibited exchanges impair an employee's ability to perform his or her job in an unbiased manner.

## FRAUD, THEFT & EMBEZZLEMENT

TTX maintains a zero-tolerance policy toward participation in fraud, theft, embezzlement, or similar activities. TTX expects its business partners to be good stewards of their resources and to conduct business with honesty, fairness, and in good faith in order to preserve the longstanding trust in our business.

COMPLIANCE HELPLINE  
**1.877.265.5194**

## UNAUTHORIZED USE OF CONFIDENTIAL INFORMATION

Confidential Information is to be used only for purposes necessary to fulfill an employee's job duties. TTX employees acknowledge that unauthorized disclosure or use of such Confidential Information may cause TTX and our business partners irreparable harm.

## SAFE WORK ENVIRONMENT

Every measure should be taken to avoid creating or facilitating an unsafe or dangerous work environment. To achieve this goal, TTX continues to develop and implement its own preventive, educational, and monitoring safety programs. TTX expects its suppliers to maintain a shared commitment to workplace safety.

## ENVIRONMENTAL PROTECTION MEASURES

TTX is committed to protecting the environment and complying with environmental, health, and safety laws and regulations. The responsibility to protect our environment is shared amongst TTX and its business partners. TTX continues to improve its environmental protection measures by promoting the conservation of resources, reusing materials and recycling, and training employees to conduct their activities in an environmentally responsible manner.

## WORKPLACE HARASSMENT

TTX is committed to maintaining a positive work environment for all employees. To that end, the workplace shall be free from harassment based upon race, color, religion, national origin, sex, age, marital status, veteran status, disability, sexual orientation, or any other legally protected classification in compliance with federal, state and local laws.

## REPORTING UNETHICAL CONDUCT

TTX offers a Compliance Helpline, which we encourage suppliers to use, to report any complaints or violations of ethical conduct. The Helpline is a toll-free, confidential service that is operated by an independent service provider twenty-four hours a day, seven days a week. You may remain anonymous when calling the Helpline, if you choose, and TTX will investigate (always without retaliation) all reports.



The Compliance Helpline is just one example of TTX's ongoing commitment to fair and ethical business practices and we hope that you will report complaints or violations when you think necessary.

## MISSION & VALUES

Every day we partner with North America's railroads in support of their business by providing an efficient pool of railcars where loadings are maximized and empty miles are minimized across the North American rail network.

As Railcar Pooling Experts®, TTX provides North America's railroads with reliable, free-running railcars at the lowest possible cost.

To accomplish this we:

SERVE OUR RAILROAD CUSTOMERS

LIVE SAFETY

DO THE RIGHT THING

SEEK EXCELLENCE

KNOW OUR BUSINESS

## TTX AT A GLANCE

TTX Company is a leading provider of railcars and related freight car management services to the North American rail industry. TTX's pool of over 230,000 cars and intermodal wells is ideal for supporting shippers in the intermodal, automotive, paper and forest, metals, machinery, wind energy and other markets where flatcars, boxcars, and gondolas are required.

Owned by North America's leading railroads, TTX's free-running pools provide fungible assets that minimize total empty miles, further lowering costs and minimizing risk for the industry, and helping the railroads conserve their capital for other critical infrastructure needs. Customers easily recognize TTX's yellow cars as a consistent, high-quality, well-maintained fleet that serves many transportation needs.

## *Sharing Our Continued Commitment to Ethics*

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## THE TTX / SUPPLIER RELATIONSHIP

TTX employees are responsible for conducting business with the highest standards of ethics and integrity. These standards exceed mere compliance with federal, state, and local laws by also requiring employees to approach business interactions and decision-making with professionalism and good judgment.

Our suppliers also play a role in ensuring these standards are achieved. TTX takes great pride in its employees for engaging in sound and ethical business practices, and we expect that you, as one of our partners in business, will join our effort by delivering high-quality products and services and conducting all business activities in an ethical manner.



FOR MORE INFORMATION CONTACT  
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