

Code for the Protection of Personal Information

Siemens Transportation Group Inc. has always been committed to keeping personal information about an individual accurate, confidential, secure and private. The Code for the Protection of Personal Information that follows builds on this permanent and ongoing commitment by The Company. The Code is based on the Model Code for the Protection of Personal Information. The Code describes how the Company subscribes to the principles set out in the Model Code.

1. **Accountability:** The Company is responsible for personal information under its control and has designated the Manager of Human Resources to be accountable for the Company's compliance with this Code.
2. **Identifying Purpose:** The purposes for which personal information is collected shall be identified by the Company when or before such personal information is collected.
3. **Consent:** The knowledge and consent of any individual are required for the collection, use, or disclosure of personal information, except in specific circumstances as described within the Code or at law.
4. **Limiting Collection:** The collection of personal information shall be limited to that which is necessary for purposes identified by the Company. Personal information shall be collected in a fair and lawful manner.
5. **Use, Disclosure and Retention:** Personal Information shall not be used or disclosed for purposes other than those for which it was collected, except with an individual's consent or as required or permitted by law. Personal Information shall be retained only as long as necessary to fulfill the purposes for which it was collected.
6. **Accuracy:** Personal information shall be as accurate, complete, and up-to-date as is necessary for the purposes for which it is to be used.
7. **Safeguards:** Personal information in the Company's possession shall be protected by security safeguards appropriate to the sensitivity of the information. In protecting personal information, the Company shall use the same standard of care as it uses to safeguard its own confidential information of a similar nature.
8. **Openness:** The Company shall make the Code readily available to the general public.
9. **Individual Access:** Upon request, an individual shall be informed of the existence, use, and disclosure of their own personal information, and shall be given access to that information. An individual is entitled to question the accuracy and completeness of their own personal information and have it amended if appropriate.
10. **Compliance:** Any individual can question the Company's compliance with this Code to the Manager of Human Resources. The Company shall investigate all complaints. If a complaint is found to be justified, The Company shall take appropriate measures, including revision of the personal information and, if necessary, amendment of this Code.