GATX Corporation
Supplier Code of Conduct

Last updated: March 2025

At GATX, doing things the right way, ethically, with integrity, and in full compliance with the law is not just a policy, it is ingrained in our culture. GATX depends on its suppliers not only to meet their business obligations, but also to do so the right way.

Our Supplier Code of Conduct is meant to help. It outlines our expectations for suppliers when working with us. This Supplier Code of Conduct applies to all suppliers to GATX and reflects applicable laws and GATX's internal policies. GATX has procurement and supply chain monitoring processes to assess certain sustainability risk exposures for its products and services for a select group of suppliers and vendors in order to assist with managing sustainability risks.

HEALTH AND SAFETY

We are committed to maintaining the health and safety of our employees, contractors, visitors, and the communities in which we operate. In addition to complying with health and safety regulatory requirements, we strive to continually identify and develop solutions to eliminate or minimize workplace hazards to protect our employees.

Suppliers are expected to comply with all applicable health and safety regulatory requirements of their national and local jurisdictions, as well as the jurisdictions where they perform their work, in order to ensure health and safety for their employees. Furthermore, we expect suppliers to train their employees on health and safety programs, workplace hazards, and safe practices to minimize health and safety risks. We expect our suppliers to follow the safety policies, procedures, and other guidelines that apply to their work for GATX.

ENVIRONMENT

We are committed to maintaining our railcars and tank containers to reduce the potential for a commodity release and to minimizing the environmental impact of our maintenance facilities. In addition to working to reduce the impact of our operations on the environment, we strive to be recognized as a responsible corporate citizen by meeting the environmental needs of our communities, our customers, and regulatory agencies.

Environmental Impact

We expect suppliers to operate in an environmentally responsible manner by complying with all applicable environmental regulations and to strive to minimize their use of and impact to natural resources.

Critical Materials and Conflict Minerals

We discourage the use of critical materials or conflict minerals. If suppliers have reason to believe that these designated materials are used, we expect suppliers to comply with applicable law and regulations, to disclose to

us which of their products contain critical materials or conflict minerals, and to engage with their suppliers in such efforts to demonstrate transparency.

QUALITY

We expect suppliers to meet generally recognized and/or contractually agreed quality requirements and regulations applicable to the products and services they provide. Products and services must be safe for their intended use, perform as warranted, and meet GATX's needs.

HUMAN AND LABOR RIGHTS

We are committed to upholding human and workplace rights throughout our global operations. We are committed to respecting the principles described in the United Nations' Universal Declaration of Human Rights, the core standards of the International Labor Organization, and the principles on human rights and labor standards as set forth by the United Nations' Global Compact.

Child Labor and Forced Labor

We do not tolerate the use of illegal child labor, forced labor, human trafficking, or slave labor.

Working Hours, Wages, and Benefits

We expect suppliers to comply with all applicable laws and regulations relating to wages, work hours, overtime, and benefits.

Non-discrimination

We expect suppliers to provide a work environment that prohibits discrimination and harassment and to treat all employees and business partners with dignity and respect. We do not tolerate disrespectful or inappropriate behavior, unfair treatment, or retaliation of any kind.

Freedom of Association

GATX respects the freedom of employees to choose whether or not to join unions and engage in collective bargaining, as permitted by applicable law.

BUSINESS ETHICS AND INTEGRITY

We aim to deal fairly and in good faith with our customers, suppliers, business partners, and competitors. Underlying this commitment to integrity is our obligation to comply with all applicable laws wherever we do business. We expect suppliers to conduct their business fairly and in good faith by refusing to engage in any form of commercial bribery, avoiding conflicts of interest, and rejecting anything that would impair free and fair competition.

Conflicts of Interest and Anti-Corruption

We expect suppliers to avoid conflicts of interest and to disclose any actual or potential conflicts of interest, including when (i) one of their employees has a relationship with a GATX employee who can make decisions that will affect the supplier's business, or (ii) one of GATX's employees has any kind of interest in the supplier's business. We expect suppliers to conduct all business transactions in an ethical and honest manner and will not offer or accept bribes, engage in extortion, or engage in any other form of unethical business practice.

Fair Competition

We expect suppliers to comply with all applicable anti-trust and fair competition laws and to refrain from engaging in activities that impede fair trade, such as price fixing, collusive bidding, illegal monopolies, boycotts, and other unfair trade practices.

Export Controls and Economic Sanctions

We expect suppliers to comply with export controls and economic sanctions of the United States and the nations in which they operate.

Confidentiality

We consider confidential and proprietary information important assets. We expect suppliers to protect confidential and personal data received by GATX. Suppliers must diligently prevent the unauthorized or accidental misuse or disclosure of GATX's data and intellectual property.

REPORTING AND REMEDIATION

This Supplier Code of Conduct outlines our expectations regarding the business practices of our suppliers and is mutually beneficial to GATX, our suppliers, our communities, and our customers. We expect suppliers to raise issues, ask questions, and report any non-compliance with this Supplier Code of Conduct by contacting their GATX business contact or by using the GATX Ethics & Compliance Portal. Contact details and further information is available in multiple languages on the Portal. Getting in touch with us quickly helps prevent problems and correct any that have already occurred. We will endeavor to work collaboratively with our suppliers to remediate issues whenever possible.

For further guidance and access to GATX's policies, please visit the Sustainability page on our website.