

## Corporate Policy Video Monitoring and Recording

### I. Scope

This Policy is applicable to all BNSF Railway employees and persons acting on BNSF Railway's behalf.

Unless otherwise expressly stated in the Corporate Rules that supplement this Policy, the content of this Policy applies to each supplemental Corporate Rule.

### II. Purpose

This Policy establishes enterprise-wide standards for all video operation, use, and recording on any BNSF Railway property or facility (whether owned, leased or operated) for regular monitoring or recording for the safety and security of BNSF Railway's customers, employees, lading, assets and property. These standards apply to all video monitoring and recording activities as well as the review and distribution of any resulting recordings. This Policy does not apply to occasional incident-specific use of video equipment by BNSF Railway Resource Protection, the Claims Department or other authorized persons for purposes of investigating accidents, incidents or claims.

### III. Definitions

BNSF Railway: BNSF Railway Company and its wholly-owned subsidiaries.

### IV. Policy Requirements

- A. Any BNSF Railway employee or person acting on BNSF Railway's behalf that installs or uses video equipment on any BNSF Railway property or facility (whether owned, leased or operated) for regular monitoring or recording must comply with this Policy.
- B. With required approval, video monitoring or recording may be used by BNSF Railway employees or persons acting on BNSF Railway's behalf in association with the safety, efficiency and security of BNSF Railway's customers, employees, lading, assets and property, when BNSF Railway deems appropriate and or necessary. Such video use will be in a manner consistent with applicable corporate rules, policies and law, including laws governing signage, and limited to uses that do not violate the reasonable expectation of privacy. All other recording video or videotaping is expressly prohibited on any BNSF Railway property or facility (whether owned, leased or operated) without BNSF Railway's prior written consent.
- C. The purchase, placement and use of video equipment or video equipment connected to the BNSF Railway LAN/WAN or to the Internet in BNSF Railway facilities must be approved by BNSF Railway Technology Services and the Resource Protection Solutions Team. For additional information about the purchase, placement and use of video equipment in facilities, locomotives and vehicles, refer to the Video Monitoring Corporate Rule.
- D. Video applications must be accessible to those with a business need. For more information, refer to the Video Monitoring Corporate Rule.
- E. Video equipment must not be used to capture sound or audio except with the express prior approval of the Law Department.

### V. Enforcement

Failure to comply with this Policy could result in disciplinary action, up to and including termination of employment.

### VI. Questions/Reports

If you have any questions about this Policy or would like to report a possible violation of this Policy, please contact the Policy Sponsor or the Vice President Compliance & Audit. Reports regarding violations of this Policy may also be submitted anonymously by using the BNSF Railway Hotline at 1-800-533-BNSF.

**VII. Policy Sponsor**

Name: Mark Schulze  
Title: Vice President Safety, Training and Operations Support

**VIII. Related Policies and Corporate Rules**

Video Monitoring and Recording Corporate Rule  
Record and Information Retention Policy  
Confidential Information Policy  
Confidential Information Corporate Rule  
Locomotive Digital Video Recorder (LDVR) Procedures  
Vehicle Video Systems (VVS) Procedures

**IX. Policy History**

Effective Date: September 1, 2014  
Last Revised: September 1, 2014

This Policy supersedes the Video Monitoring Policy, effective January 1, 2006.

**Approved:**

/s/ Carl R. Ice  
Carl R. Ice  
President and Chief Executive Officer