

Conflict Minerals Policy

It is the policy of Norfolk Southern Corporation and its majority-owned subsidiaries (collectively, "Norfolk Southern") to comply with all applicable laws, including Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010 ("Section 1502").

Pursuant to the final rule approved by the U.S. Securities and Exchange Commission (the "SEC") on August 22, 2012, under Section 1502 (the "Rule"), Norfolk Southern must file with the SEC a report on Form SD regarding the presence of Conflict Minerals in the products it manufactures for sale if such Conflict Minerals are necessary to the functionality or production of such product(s). Norfolk Southern has determined that certain of its business operations likely constitute the manufacturing of products for sale as contemplated by the Rule (the "Manufacturing Activities").

Norfolk Southern's commitment to social responsibility extends to the sourcing of the goods and services necessary to operate its business. Consistent with the requirements of the Rule, Norfolk Southern shall, on an ongoing basis: (1) identify suppliers that provide to any Manufacturing Facility materials that have the potential to contain Conflict Minerals, (2) perform due diligence with respect to both the supply chain for and use of materials provided to any Manufacturing Facility in order to ascertain whether such materials contain Conflict Minerals and are used in a way that actually constitutes Manufacturing Activities, and (3) work with suppliers in an effort to ensure that materials provided to any Manufacturing Facility do not contain Conflict Minerals that directly or indirectly finance or benefit any Armed Group. Toward these ends, Norfolk Southern also has an expectation that its suppliers will have policies and procedures in place that will support Norfolk Southern's efforts to comply with the Rule.

To provide feedback on the content or execution of this policy, please contact Norfolk Southern at (800) 732-9279 or conflictminerals@nscorp.com.

As used in this policy, the following terms have the following meanings:

"Adjoining Country" means at any time a country that shares an internationally recognized border with the Democratic Republic of the Congo, including Angola, Burundi, Central African Republic, Republic of the Congo, Rwanda, South Sudan, Tanzania, Uganda or Zambia.

"Armed Group" means an armed group that is identified as a perpetrator of serious human rights abuses in annual Country Reports on Human Rights Practices under sections 116(d) and 502B(b) of the Foreign Assistance Act of 1961 (22 U.S.C. 2151n(d) and 2304(b)) relating to any of the Covered Countries.

"Conflict Minerals" means (i) columbite-tantalite, cassiterite, wolframite, gold or any derivative of the foregoing (including without limitation tantalum, tin and tungsten) and (ii) any other mineral or any derivative thereof as may be determined from time-to-time by the U.S. Secretary of State to be financing armed conflict within the Covered Countries.

"Covered Countries" means the Democratic Republic of the Congo and every Adjoining Country.

"Manufacturing Facility" means any Norfolk Southern facility at which Manufacturing Activities have been deemed to take place, including the Juniata Locomotive Shop and the Charlotte Roadway Shop.