

Non-Retaliation

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A. SUMMARY

Any form of retaliation against employees or third parties who make good faith reports or who participate in the investigation of an actual or potential violation of UTC's *Code of Ethics* is prohibited. Violators of this Policy are subject to disciplinary action, up to and including termination of employment or other business relationships with the company.

B. APPLICABILITY

This Policy applies to United Technologies Corporation, including its subsidiaries, divisions and any other business entities controlled by the Corporation worldwide and all employees thereof. This Policy likewise extends to third parties (entities and individuals) who seek in good faith to report misconduct to the company or who retaliate against UTC employees or others for having done so.

C. POLICY

1. UTC's *Code of Ethics* requires all employees at all levels to speak up in good faith when they observe actual or suspected violations of the *Code of Ethics*, its implementing supplements and policies, or any law, regulation or procedure (as used throughout this Policy, "misconduct"), unless such reporting is prohibited or otherwise restricted by law. UTC similarly expects non-employees to report UTC-related misconduct to the company. "Good faith" means a report made with the honest and reasonable belief that misconduct may have occurred. The company's various reporting channels, such as the [Ombudsman program](#), are available to employees and third parties to raise concerns.
2. UTC prohibits any retaliation, subtle or overt, against anyone who, in good faith, reports or participates in the investigation of actual or suspected misconduct, whether or not the allegation is substantiated. "Retaliation" means an adverse action against the employee or third party because of making or investigating a good faith report. The adverse action can be committed by someone in the same supervisory chain or by someone outside of that chain (e.g. peer, third-party). Those who witness or experience retaliation are encouraged to report this misconduct as described in paragraph 1.
3. UTC vigorously investigates alleged retaliation, and any person or third party found by the company to have engaged in retaliation will be subject to discipline, up to and including termination of employment or of such third party's business relationship(s) with the company.
4. UTC will further protect known reporters by following up with them on a regular basis to identify and respond to situations that might reasonably be perceived as retaliatory.
5. This Policy does not exempt employees or third parties from accountability for their involvement in wrongdoing.

D. PROCEDURES

None.

E. REFERENCES

Code of Ethics

Non-Retaliation Handbook

F. REVIEW

This Policy shall be reviewed biennially.