

Contracting with Diverse Businesses

SUMMARY

APPLICABILITY

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Exhibit 1 – Detail of Procedures



Code of Ethics

A. SUMMARY

United Technologies Corporation seeks to maximize opportunities for small, small disadvantaged, minority-owned, woman-owned, veteran-owned and historically underutilized businesses to serve as suppliers and subcontractors to the Corporation.

B. APPLICABILITY

This Policy applies to the Corporation and all of its U.S.-based subsidiaries, divisions and other business entities controlled by it.

C. POLICY

1. Companies owned by minorities, women, service-disabled veterans as well as small, small disadvantaged and historically underutilized businesses shall have equal opportunity to compete for and participate in contracts and subcontracts awarded by the Corporation and its operating units. The Corporation and its operating units will assist in developing and strengthening these businesses.
2. The Corporation and its operating units will purchase goods and services consistent with this policy and sound business practices. Subcontracts awarded under U.S. Government contracts will conform to applicable government regulations.

D. PROCEDURES

See [Exhibit 1](#).

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EXHIBIT 1

A. Each operating unit shall ensure that:

Written procedures are established to implement this policy;

Employees who are responsible for committing (directly or indirectly) funds for the purchase of goods and services are aware of and apply this Policy;

Management and technical assistance is offered, where appropriate, to assist these businesses in becoming stronger suppliers in their area(s) of expertise;

Standard Supplier Diversity provisions are used in all contracts with U.S.-based companies and that appropriate goals are negotiated; and

U.S.-based suppliers are obligated in their contracts with the Corporation to implement similar initiatives.

The UTC Vice President, Operations is responsible for overall coordination and implementation of this Policy. Senior operating unit executives responsible for Supply Management have overall responsibility for carrying out this program. Supplier Diversity Program Managers/Small Business Liaison Officers are responsible for coordinating, reporting, and assisting with company-wide implementation of and compliance with this Policy.