



United Technologies

Code of Ethics

Trust. Respect. Integrity.



Our Commitments

UTC's Commitments define who we are and how we work. They focus our businesses and move us forward.

Performance

Our customers have a choice, and how we perform determines whether they choose us. We aim high, set ambitious goals and deliver results, and we use customer feedback to recalibrate when necessary. We move quickly and make timely, well-reasoned decisions because our future depends on them. We invest authority where it needs to be, in the hands of the people closest to the customer and the work.

Pioneering Innovation

We are a company of ideas that are nurtured by a commitment to research and development. The achievements of our founders inspire us to reach always for the next innovative and powerful and marketable idea. We seek and share ideas openly, and value differences in experiences and opinion.

Personal Development

Our employees' ideas and inspiration create opportunities constantly, and without limits. We improve continuously everything we do, as a company and as individuals. We support and pursue lifelong learning to expand our knowledge and capabilities and to engage with the world outside UTC. Confidence spurs us to take risks, to experiment, to cooperate with each other and, always, to learn from the consequences of our actions.

Social Responsibility

Successful businesses improve the human condition. We maintain the highest ethical, environmental and safety standards everywhere, and we encourage and celebrate our employees' active roles in their communities.

Shareowner Value

We are a preferred investment because we meet aggressive targets whatever the economic environment. We communicate honestly and forthrightly to investors, and deliver consistently what we promise. We are a company of realists, and we project these values in everything we do.

Welcome

Dear UTC Colleagues,

UTC's Code of Ethics was first published in 1990. It guides us in our business activities and helps define what is ethical and not, and what is allowed and not. Ethics and compliance with law are strong foundations at UTC and will determine our actions and behaviors.

Because fifteen years have passed since the initial Code, our ethics and compliance programs are being refreshed and strengthened. Please read this updated Code carefully and note that related training is required for all employees. Both will guide you in resolving questions and identifying reportable ethical or legal matters in areas such as accuracy of records, sales practices, improper payments, conflicts of interest, export controls, and government contracting.

Business Practices Officers are available worldwide to answer questions, provide guidance, deliver training, and respond to your concerns. We encourage you to contact them anytime. Alternatively, call a UTC Ombudsman or write a DIALOG.

Ethics and compliance are our shared responsibility. We are relying on you to keep them among your highest priorities.

Sincerely,



A handwritten signature in black ink, appearing to read "George David". The signature is fluid and cursive.

*George David
Chairman and Chief Executive Officer*



A handwritten signature in black ink, appearing to read "Louis Chênevert". The signature is fluid and cursive.

*Louis Chênevert
President and Chief Operating Officer*

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Overview

The UTC *Code of Ethics* applies to UTC and its controlled entities, worldwide. In addition to stating rules that govern our actions, the *Code* is an expression of fundamental values and represents a framework for decision-making. The *Code* is further explained and implemented by *Code Supplements* and by policies contained either in the *Corporate Policy Manual* or the *Financial Manual*.

The underpinnings of ethical business practices at UTC are the following:

- We will obey the law.
- We will act in good faith.
- We will consider the impact of our decisions on our stakeholders and seek fair resolutions.
- We will communicate openly and effectively with our stakeholders.
- We will seek always to build trust, show respect, and perform with integrity.

The integrity, reputation and profitability of UTC ultimately depend upon the individual actions of our directors, officers, employees and representatives, all over the world. Each is personally responsible and accountable for compliance with this *Code*.



Our Principles — How We Make Decisions

UTC is committed to the highest standards of ethics and business conduct. This encompasses our relationships with our customers, our suppliers, our shareowners, our competitors, the communities in which we operate, and among employees at every organizational level.

Our Customers

We will provide high quality and value, competitive prices, and honest transactions to those who use our products and services. We will deal lawfully and ethically with our customers.

Our Employees

We will treat employees fairly and use employment practices based on equal opportunity for all employees. We will respect the interests of employees in privacy and treat employees with dignity and respect. We are committed to providing safe and healthy working conditions and an atmosphere of open communication for all our employees.



Our Suppliers and Partners

We will deal fairly with our suppliers and partners. We will seek long-lasting business relationships, without discrimination or deception.

Our Shareowners

We will work to provide a superior return to our shareowners. We will safeguard the value of their investment through the prudent use and protection of corporate resources, and by observing the highest standards of legal and ethical conduct in all our business dealings.

Our Competitors

We will compete vigorously, independently and fairly, basing our efforts on the merits of our competitive offerings.

Our Communities

We will be a responsible corporate citizen of the communities worldwide in which we operate. We will abide by all national and local laws, and we will strive to improve the well-being of our communities through the protection of natural resources, through the encouragement of employee participation in civic and charitable affairs, and through corporate philanthropy.



Our Standards of Conduct — How We Perform

*The following standards of conduct define our minimum expectations for ethical behavior. Because these standards cannot anticipate the particular facts of every situation, they must be interpreted and applied within the framework of the laws and mores of the jurisdictions in which we operate, as well as in light of UTC's **Commitments, Principles, Code Supplements**, policies, and good common sense. Reasons such as “everyone does it” or “it’s not illegal” are unacceptable excuses for violating these **Standards**. We must be mindful of avoiding at all times, on and off the job, circumstances and actions that give even the appearance of impropriety or wrongdoing which could discredit UTC.*

1. Quality & Safety

UTC’s products must be designed, produced and delivered with the primary consideration of the safety and health of our customers, product users, employees, and others who may be affected.

UTC operating units have the responsibility to design, manufacture, and deliver quality products. All required inspection and testing operations must be completed properly.

These standards are reflected in UTC’s policies entitled “[Quality Assurance Programs](#)” and “[Product and Services Safety Program](#).”

2. Marketing & Selling

UTC will compete in the global marketplace on the basis of the merits of our products and services. We will sell our products and services honestly and will not pursue any sale that requires us to act unlawfully or in violation of these standards.

In making comparisons to competitors, care must be taken to avoid disparaging a competitor through inaccurate statements.

All persons acting on behalf of UTC will abide by the laws relating to improper payments. *Sales and marketing services performed by third-parties outside the United States must comport with UTC’s policy entitled “[Non-U.S. Sales Representatives](#).”*

Business gifts that are customary and reasonable in frequency and value are permitted, generally. A gift is never permitted if intended in exchange for favorable treatment or if prohibited by the policies of the recipient or his/her employer.

UTC will not offer or pay any bribe.

Business Gifts are addressed in the Code Supplement entitled “[Giving and Receiving of Business Gifts](#).”

3. Protecting Information Belonging to Others

UTC respects the legitimate proprietary rights and trade secrets of our customers, suppliers, and third parties. *UTC will solicit, accept, use, and disclose proprietary information belonging to others only in conformity with UTC's policies on "Proprietary Information Protection" and "Software License Compliance."*

In the highly competitive global marketplace, gathering information about our competitors and competing products and services is a necessary and routine element of business. In gathering competitive information, UTC will not utilize any improper means such as theft or deception. *See UTC's Code Supplement entitled "Gathering Competitive Information."*

Personal information collected from customers, suppliers and other visitors to UTC's internet and other sites will be protected in accordance with UTC's policy entitled "*Privacy of Personal Information Collected Online.*"

4. Protecting Company Assets

UTC's assets, including tangible assets (such as facilities, money, equipment, and information technology systems) and intangible assets (such as intellectual property, trade secrets, invention disclosures, sensitive business and technical information, computer programs, and business and manufacturing know-how) will be used properly and as authorized by management. UTC's assets will not be used for personal gain. All business transactions must be authorized by management and comply with delegations of signature authority and processes for internal review and approval.

IN BRIEF...

- We design, manufacture, and service our products so that the rest of the world can depend on them.
- We compete on the merits.
- We sell our products and services honestly.
- We protect UTC's assets.

Our Standards of Conduct — How We Perform

Additional guidance is contained in applicable UTC intellectual property agreements, UTC's policy on "Proprietary Information Protection," and UTC's Corporate Policy Manual and Financial Manual.

5. Accuracy of Records

All assets, liabilities, revenues, expenses, and business transactions must be completely and accurately recorded on UTC's books and records, in accordance with applicable law, accepted accounting principles, and established UTC financial policies and procedures. Budget proposals and economic evaluations must fairly represent all information relevant to the decision being requested or recommended. No secret or unrecorded cash funds or other assets will be established or maintained for any purpose.

UTC will advise customers and suppliers of errors and promptly correct the error through credits, refunds or other mutually acceptable means.

The retention and proper disposal of records and data shall be in accordance with UTC's policy entitled "Retaining Records and Data" and applicable legal requirements.

6. Government Procurement

UTC will comply with procurement laws and rules as they apply to UTC's business with governments around the world.

UTC takes special care to comply with the unique and special rules that apply to contracting with the U.S. Government. At all times, UTC will follow the Government's rules for competing fairly, will honor restrictions applying to Government employees (e.g., gifts and employment), will deliver products and services that conform to specifications, will adhere to government accounting and pricing requirements, will claim only allowable costs, and will ensure the accuracy of data submitted.

The UTC "Policy Statement on Business Ethics and Conduct in Contracting With the United States Government" contains specific guidelines and requirements.

7. Equal Employment Opportunity

UTC will treat employees and applicants for employment fairly, based only on factors related to UTC's legitimate business interests. UTC's policy entitled "Equal Employment/Affirmative Action" contains guidelines and requirements.

UTC strives to assure that it has an enduring competitive advantage in the quality and talent of its workforce, and UTC supports initiatives that foster workforce diversity, as described in its policy entitled "Managing Workforce Diversity."

8. Workplace Environment

UTC is committed to providing its employees a workplace that is free from known safety and health hazards, and a work environment free from discrimination, harassment, or personal behavior not conducive to a productive work climate.

All UTC entities worldwide will abide by applicable laws and regulations regarding possession or use of alcohol, drugs, and other controlled substances.

Subject to local law, and subject to approval by the Human Resources Department (at UTC Corporate, one of the major UTC Business Segments, or a business unit reporting directly to either), local management has authority to make decisions regarding the serving of alcohol on UTC premises. UTC prohibits employees and others from being intoxicated while on company premises.

UTC prohibits the use, sale, purchase, transfer, possession or presence in one's system of controlled drugs while on company premises. This prohibition, of course, does not apply to drugs which are medically prescribed and used lawfully.

IN BRIEF...

- We keep accurate and complete records.
- We strictly follow the special rules of government procurement.
- We treat each other fairly and with respect.
- We relentlessly pursue workplace safety.

Our Standards of Conduct — How We Perform

Employees with problems such as alcoholism, drug dependency, or other serious personal and emotional problems will receive opportunities for assistance and treatment.

Additional information is included in UTC's policy entitled "[Drug, Alcohol and Substance Abuse](#)." Opportunities for assistance and treatment are outlined in the "[Employee Assistance Programs](#)" policy.

9. Employee Privacy

UTC respects the privacy interests of its employees.

UTC will comply with applicable laws in all jurisdictions where UTC collects, uses, or discloses employee personal information. *Additional information is contained in the UTC policy entitled "[Employee Personal Information](#)."*

Personal conduct, unrelated to UTC, is not UTC's concern, unless such conduct impairs the employee's work performance or affects the reputation or other legitimate business interests of UTC.

10. Employee Communications

UTC will provide its employees with timely information on business results, product performance, customer relations, and employee achievements. Communication channels will be provided that encourage self-expression and open discussion relative to employee opinions, attitudes, and concerns. One channel of communication is the

employee survey, which is generally conducted every other year and which solicits input on a wide range of subjects, such as compensation, management's performance, and business ethics.

11. Employee Development

UTC is dedicated to promoting employee development through assistance in improving and broadening work-related skills and lifelong learning. Over and above traditional learning and training opportunities, UTC promotes employee development through the "[Employee Scholar Program](#)." Under this program, UTC pays tuition (and certain other costs) for eligible employees pursuing a degree from a qualified institution and then recognizes graduates with UTC stock (or stock options or stock units).

Additional information is included in UTC's policy entitled "[Employee Scholar Program](#)."

12. Compensation & Benefits

UTC will attract, motivate and retain competent, dedicated people by designing compensation and benefits programs that are competitive in our worldwide marketplaces.

13. Conflicts of Interest

UTC's directors, officers, employees, and representatives must be loyal to UTC and deal with suppliers, customers and others in a manner that avoids even the appearance of a conflict between personal interests and those of UTC. *UTC's policy entitled "[Conflicts of Interest](#)" further defines conflicts, provides*

guidance on specific subjects, and identifies processes for resolving possible conflicts.

Coverage includes the following:

- The direct or indirect financial or stock ownership interest in UTC suppliers, customers, or competitors;
- Seeking or accepting gifts or any form of compensation from suppliers, customers or others doing business, or seeking to do business with UTC (see the *Code Supplement* entitled “[Business Gifts from Suppliers](#)”);
- Directorships, employment by, or voluntary service rendered to another company or organization; and
- The personal use of corporate assets (including, for example, tangible property, proprietary information, non-public information, or business opportunities).

Actual and potential conflicts must be disclosed to UTC for review. When in doubt, seek guidance from the [Business Practices](#) office.

14. Securities Trading & Release of Material, Nonpublic Information

UTC’s directors, officers, employees and representatives must maintain the confidentiality of material, nonpublic information (which is understood as information not disclosed by UTC and which a reasonable investor would consider important in making an investment decision). Such information will be disclosed only through designated spokespersons, who typically would be the most senior UTC officers.

IN BRIEF...

- We communicate honestly with all stakeholders.
- We support and pursue lifelong learning.
- We are loyal to UTC and avoid conflicts of interest.
- We appropriately use and protect information.

Our Standards of Conduct — How We Perform

UTC's directors, officers, employees and representatives (and their immediate family members) must not buy, sell or otherwise trade securities while aware of material, nonpublic information.

Specific guidance is included in UTC's policy entitled "Securities Trading and Release of Material Nonpublic Information."

15. Representatives

All representatives (in addition to directors, officers, or employees) of UTC must act on behalf of UTC in a manner consistent with the *Code*.

UTC will not use any representative to circumvent standards of conduct described in this *Code*.

16. Partners & Suppliers

UTC purchases equipment, supplies and services on the basis of merit. UTC's partners, suppliers, vendors and subcontractors will be treated with fairness and integrity and without discrimination.

Those who deal with suppliers or potential suppliers are subject to UTC's policy governing "Conflicts of Interest" and the Code Supplement entitled "Business Gifts from Suppliers."

UTC seeks to maximize opportunities for small, small disadvantaged, minority-owned, woman-owned, veteran-owned, and historically underutilized businesses to serve as suppliers and subcontractors, in accordance with its policy entitled "*Contracting with Diverse Businesses*."

17. Shareowner Communications

UTC will comply with all laws, rules, and regulations regarding the public disclosure of business information. All periodic reports, filings, and public communications, whether oral or written, must be full, fair, accurate, timely, and understandable, with no material omissions. *All public disclosures will be made in accordance with UTC's policies on, "Securities Trading & Release of Material Nonpublic Information," "Disclosures to Investors Under U.S. Securities Laws," and "Maintenance of Corporate Governance and Financial Data."*

18. Protecting the Environment

UTC will conduct its worldwide operations in a manner that safeguards the natural environment. All required permits will be obtained; the terms of all permits will be upheld; and efforts will be made to minimize waste. *All entities will conduct their operations, and design and manufacture their products, in conformance with the principles contained in UTC's policy entitled "Environment, Health and Safety."*

19. Community Support

UTC supports organizations and activities of the communities worldwide in which we reside. We will support worthwhile civic and charitable causes, and employees are urged to participate personally. *See UTC's policy entitled "Charitable and Philanthropic Contributions."*

20. Involvement in the Political Process

UTC will comply with all national, state and local laws regulating UTC's participation in political affairs, including limitations on contributions to political parties, national political committees, and individual candidates.

Those who make contacts on behalf of UTC with political parties, candidates, elected officials, or governmental officials must comply fully with all applicable laws and UTC policies (*including this Code and UTC's policy entitled "Government Relations"*).

UTC will not offer or pay any bribe.

UTC encourages its directors, officers and employees to be informed voters and to be involved in the political process. Personal participation in political activities, including contributions of time or financial support, is a personal decision and will be entirely voluntary.

IN BRIEF...

- We do not circumvent the Code.
- We treat suppliers fairly and with respect.
- We improve the quality of life in our communities.
- We protect the natural environment.

21. International Trade

Various governments and multinational organizations control the international movement of certain commodities, manufactured products, technical data, and services, and maintain full or partial trade embargoes and economic sanctions on certain targeted countries, entities and individuals. These controls may apply to imports, exports, financial transactions, investments, and other types of business dealings. UTC will comply fully with these laws. We must remember that an export of technical data can be electronic, oral or visual, and that an export can take place even without technical data moving between countries. Some countries also prohibit or control re-export of items beyond their original destination.

UTC's policy regarding "Export/Import Controls & Economic Sanctions" contains specific guidance. See, also, the Code Supplement entitled "International Trade Controls: A Compliance Guide."

Business entities worldwide will comply with UTC's policy entitled "Compliance with U.S. Antiboycott Laws."

22. Antitrust Laws

UTC will comply with the antitrust laws (also known as competition laws) of every jurisdiction in which we do business. We will not engage in bid rigging; we will not fix prices; we will not allocate markets; and we will not abuse market power.

UTC's "*Antitrust Compliance*" policy contains specific prohibitions on communicating with competitors regarding the marketing and sale of our products and services. For example, we will not discuss prices, costs, profits, or marketing strategies.

See also the Code Supplements entitled "Antitrust Guide for Employees" and "European Union Competition Law Guide." Guidelines for participation in trade associations are included.

23. Local Laws & Customs

UTC is a global company serving markets worldwide, often doing business under laws, cultural norms, and social standards that differ widely across regions and countries.

UTC will abide by the national and local laws of the countries in which we operate. If a conflict arises with respect to laws applicable between countries, the Legal Department must be consulted.

UTC will not knowingly facilitate illegal conduct or fraud by others, regardless of local norms.

IN BRIEF...

- We honor the Code as more than a set of rules. It is a guide that helps us deliver on our Commitments.
- We obey the law, perform in good faith, communicate openly, and seek fair outcomes.
- We ask questions, raise concerns, and call attention to problems.
- Put simply, we build trust, show respect, and perform with integrity.

Our Code of Ethics — How We Comply

Complying with this Code of Ethics

Each director, officer, employee and representative of UTC worldwide must comply with this *Code* and its implementing supplements and policies.

Managers at all levels of UTC are responsible for creating and fostering a culture of ethical business practices, encouraging open communications, and instilling an awareness of and commitment to this *Code of Ethics*.

Failure to comply with this *Code* or any its requirements will result in appropriate discipline, up to and including discharge. Discipline will be determined by the cognizant operating management in conjunction with the **Business Practices** office, and principles of fairness and equity will apply.

Asking Questions & Raising Concerns

Questions regarding this *Code*, its application to specific circumstances, and reports of actual or suspected violations can be raised to any level of the supervisory chain, the Legal Department, a **Business Practices Officer**, Human Resources, or by contacting a **UTC Ombudsman** or using *DIALOG*.

Since 1986, UTC Ombudsmen have been in place as a confidential, neutral, and informal communication medium. Ombudsmen are available to all UTC employees worldwide and will address any business-related issue (except those subject to the provisions of collective bargaining agreements or those restricted by applicable law). Each Ombudsman acts as an intermediary in obtaining answers from management, while protecting the identity of the person who raised the issue. Ombudsmen, who are trained professionals, can be contacted by using the toll-free help-line at the telephone numbers appearing at the end of this *Code*.

DIALOG is a companion, confidential communication process, using a network of part-time, local administrators. Rather than the toll-free help-line, DIALOG is a written, two-way, communications channel which is intended to address those issues that are less complex. UTC also provides DIALOG access worldwide through an internet-based system (eDIALOG.confidential.com) accessible from any computer at work, home, an Internet café, library, etc. *DIALOG* supports multiple languages.

Each director, officer, employee, and representative is personally responsible for raising to UTC's attention any actual or suspected violations of this *Code of Ethics*, its implementing supplements and policies, or any law or regulation. UTC prohibits any retribution against any person for reporting anything he/she reasonably believes constitutes a violation or suspected violation. In addition, UTC prohibits any retribution against any employee who raises, in good faith, any concern with respect to policies or practices used within a business. However, the use of these communication channels to report wrongdoing will not absolve anyone from accountability for personal involvement in any wrongdoing.

UTC employees and others who suspect irregularities in company accounting, internal accounting controls, or auditing matters, can report these matters to UTC by using the mail, e-mail, and toll-free numbers published on UTC's website at www.utc.com. Alternatively, employees of UTC may contact an Ombudsman or use *DIALOG*.

Implementing this Code of Ethics

This *Code of Ethics* has been adopted by UTC's Board of Directors and applies worldwide. "UTC," as used throughout this *Code*, includes UTC's controlled entities. The *Code* applies to all directors, officers, employees, and representatives, including consultants and agents.

The UTC Vice President, Business Practices is responsible for implementing this *Code* through *Code Supplements*, the *Corporate Policy Manual*, and (working with the Finance Department) the UTC *Financial Manual*.

Waiver of all or part of this *Code of Ethics*, conflicts of interest, or various other policies issued to implement the *Code* will be granted only in exceptional circumstances and only after approval by the UTC Vice President, Business Practices. Any waivers for directors and executive officers must be approved by both the Vice President, Business Practices and the Board of Directors or a Board committee and will be disclosed promptly as required by law, regulation and UTC policy.

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Contact Information

Questions regarding applicability or interpretation should be addressed through supervisory channels, the entity legal counsel, the entity Business Practices Officer, or the UTC Business Practices Office, either at 860.728.6485 or bpo@corphq.utc.com.

UTC's Ombudsmen can be contacted from anywhere toll-free at:

Asia-Pacific
800.871.9065

Europe, Middle East & Africa
888.553.3335

Americas
800.458.4299

When calling from outside the U.S., you must first dial the pertinent AT&T Direct access code found at www.business.att.com.

You can also submit a *DIALOG* inquiry in writing using the [postage-paid materials](#) available throughout UTC, or via the Internet at <https://edialog.confidential.utc.com>.

The *Code* and *Code Supplements* are publicly available on-line at www.utc.com. The *Code*, *Code Supplements*, *Corporate Policy Manual*, and the *Financial Manual* are posted for employees on the UTC intranet.

For more information about UTC's corporate responsibility, visit www.utc.com, and click "Corporate Responsibility."

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