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### Introduction

### **YOU ARE OTIS -**

### **Dear Otis Colleagues,**

We work in a fast-paced business environment where decision-making happens quickly and frequently. Some decisions are harder than others, and some present real ethical dilemmas. In every case, we should all do the right thing: protect human health and safety, conduct business with integrity, and honor our agreements.

At Otis, the way we work and do business is summed up in our unwavering commitment to our **Three Absolutes: Safety, Ethics, and Quality.** These core values establish standards of conduct and ethical principles that guide each of us – regardless of geographic boundaries, titles, functions or cultures – in our day-to-day decisions.

There is nothing more sacrosanct than our Absolutes. That's why our leaders model them and every one of our employees embraces them – it is what gives you the honor of wearing the Otis logo.

As a member of the Otis team, it is your responsibility to speak up if you have questions and take action if you suspect wrongdoing. I can assure you: you will never get in trouble for speaking up to protect our Absolutes.

When we apply these principles to our daily work, we create an environment that allows us to pursue our vision - giving people freedom to connect and thrive in a taller, faster, smarter world.

Judy Marks
President & CEO, Otis

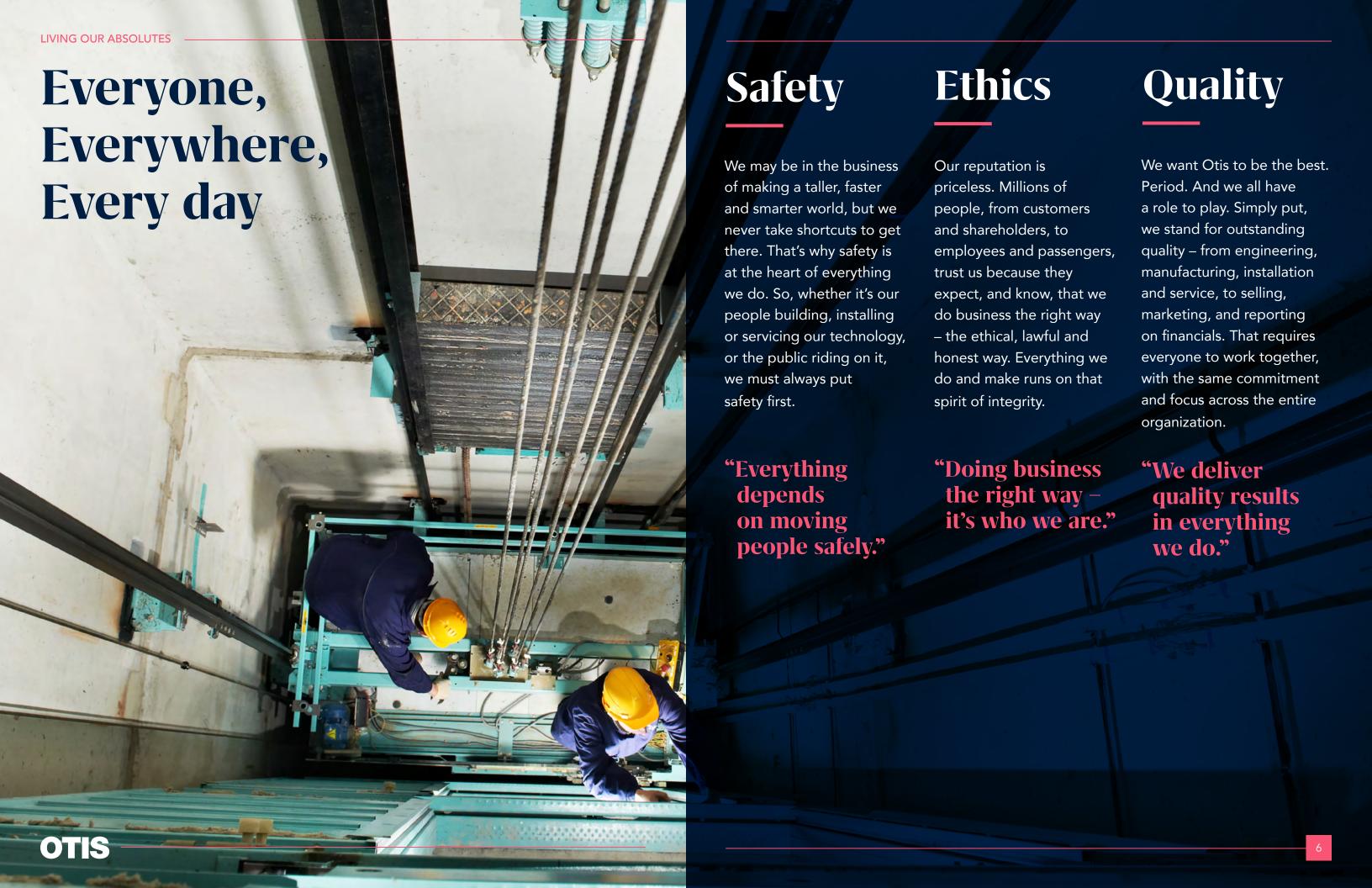


# THE BUILDING BLOCKS OF BEING OUR BEST

**Welcome!** If our culture reflects who we are, then our Three Absolutes define how we think, how we make decisions, and how we take action, every single day.

We give people freedom to connect and thrive in a taller, faster, smarter world.

Safety, ethics, and quality are absolutely core to us and what we do. They're the DNA of the Otis family. They're what drive us, and the world around us, to new heights. And these Three Absolutes are key to conquering our challenges, communicating clearly, and constantly staying one step ahead. Because while we are many voices, we all share a common pursuit to be our absolute best. It's simply who we are.



### YOU MAKE ALL THE DIFFERENCE

It takes courage to live up to our high values. But speaking up when things don't look quite right, or when we believe we can do better, is simply how we work.

Everyone at Otis has a voice and is encouraged to use it. Listen to each other and share your opinions. Are we in line with our Three Absolutes? Are we missing opportunities? Is this really the right thing to do?

Asking a question or raising a concern might look easy, but it's not always that simple. That's why good listeners abound at Otis. Your supervisors, your HR and legal colleagues, your Ethics & Compliance Officers are all ready to help.

When in doubt, reach out. If you raise a concern, we'll get to the bottom of it thoroughly and fairly.

We have a consistent process to understand what happened, and why. When needed, we correct the situation (which sometimes requires discipline) to prevent it from happening again.

### IT'S EVERYONE'S RESPONSIBILITY TO:

- Step up, help out, and set an example – every time.
- Know the Otis Absolutes and put them into action.
- Always go above and beyond.

### IF YOU'RE A SUPERVISOR OR MANAGER, MAKE SURE YOU:

- Create a positive, inspirational, productive place to work.
- Encourage everyone to come forward with ideas, improvements, and concerns.
- Respond promptly and respectfully to all reports.

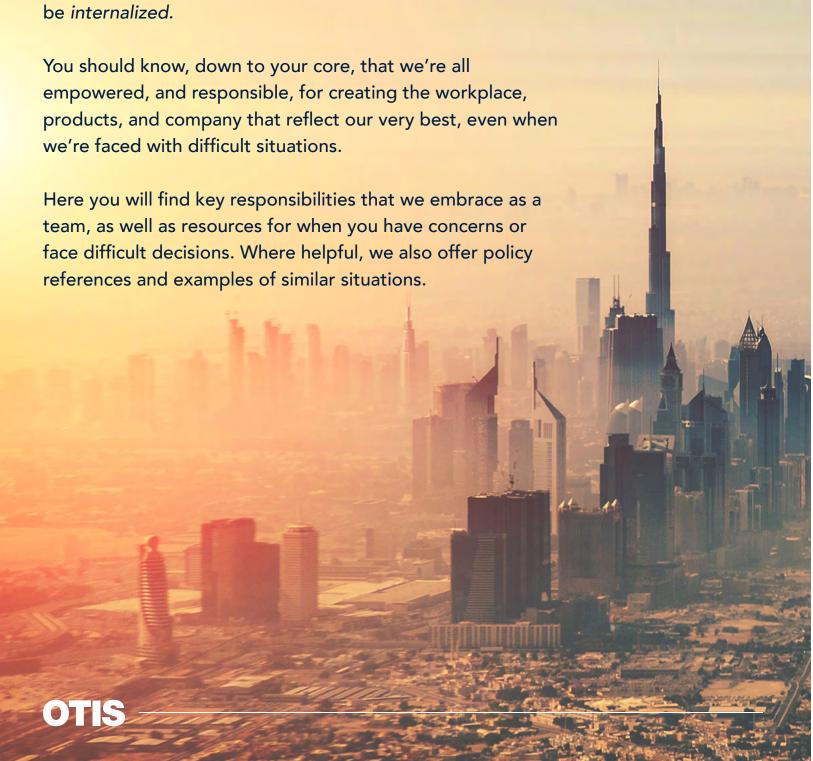
Want more info? Check out our Non-retaliation Policy.





### **LOOKING FOR DIRECTION?** THIS IS YOUR COMPASS

Think of this guide as your blueprint for making Otis a safe and ethical place to do your highest quality work. It's a living document with clear guiding principles and it's meant to



### **OUR HELPFUL CHECKLIST FOR** MAKING ETHICAL DECISIONS

Elisha Otis built our company on integrity, and that's been a common passion of everyone who's worn our logo since we first put brakes on elevators, way back in 1853. But leading with integrity takes focus. So, whenever you're faced with an ethical choice you should always ask yourself two fundamental questions before you act:

### 1: Can I...?

Is this legal? Compliant? In line with laws and policies?

### **2: Should I...?**

Does whatever you're about to do match up with our Three Absolutes and reputation? (Imagine if it goes viral on the internet.)

If you answer 'no,' or even if you're not 100 percent sure about your answers to these self check-ins, take a moment and reflect:

- What are your duties to everyone affected by this decision?
- What happens if you go ahead with this choice?
- What are the potential alternatives?

It's absolutely okay to ask questions when you are unsure. You should. That's part of your job. Talk to your supervisor, your HR or legal colleagues or your Ethics & Compliance Officer – that's what they're there for!

For additional guidance, our Policy Manual and Financial Manual is the place to go.

# People, workplace and environment

### **SAFETY IS ALWAYS FIRST**

Otis safely moves the equivalent of the entire world's population...every three days. Think about all those millions of Otis colleagues, customers, suppliers and passengers who trust us with their lives.

Why? Because safety always takes precedence over schedule and costs – and we never apologize for that. In fact, it's a point of immense pride for us and it's why we always put safety first.

Whether on the ground floor or 75 stories in the sky, anyone who steps into our offices and elevators, onto our jobsites and escalators, should feel confident and secure, every time.

We call our fundamental work-safety principles the **Cardinal Rules.** They are built into everything we do – from fall protection in the hoistway to controlling elevator movement during service and electrical safety procedures on the jobsite.

Cardinal? Because they should never be broken: we want Otis workers and field professionals to return home safely at the end of every day. We want you, and everyone who interacts with Otis, to be safe.

For more information about safety, see our programs on Environment Health and Safety, Product and Services Safety, Fatality and Serious Injury/Incident Investigation Reporting, Substance, Drug, Alcohol Abuse Policies.

Following the safety rules comes down to a few key choices you make daily:

- Observe all laws, standards and safety guidelines that govern your work.
- Spot and control risks, report concerns and near misses, so all can be fixed.
- Keep your workplace tidy
   inside and out free from hazards and injuries.

- Be comfortable giving and receiving feedback on how we can all be safer.
- Respect our security and emergency procedures so everything and everyone is protected.
- Abide by alcohol and drug restrictions at work.

If you can't follow the Cardinal Rules, stop immediately and contact your supervisor. Safety comes before anything else! You'll never, ever get in trouble for putting safety first.



Q: How does our zero-tolerance drug policy affect my use of prescription drugs?

A: If you are on prescribed medicine that could affect your work performance, you should mention it to your supervisor or Human

Resources. In certain cases, prescription drugs might impair judgment or awareness in a way that leads to unsafe working conditions. By discussing this, you can be sure you are properly evaluated and observed, for the sake of everyone's safety

Worried about your safety or that of others? Contact a supervisor, the Safety department, Human Resources or the Legal department, an Ethics & Compliance Officer, or the Otis Hotline.

# QUALITY IS THE FOUNDATION OF EVERYTHING WE DO

The work we all do at Otis has a real, significant, and measurable impact on people's lives. Day and night, around the globe, our passengers and customers trust our unbending commitment to quality to get them safely where they're going.

But making, installing and upkeeping the world's best elevators and escalators is only one way we're obsessed with quality. This deep-held promise can be felt throughout all of Otis – we all strive to deliver flawlessly on our daily commitments.

### "Every one of us owns quality."

### TO BE THE MOST TRUSTED PROVIDER IN THE INDUSTRIES WE SERVE, WE:

- Take full responsibility for the workmanship and service we provide.
- Act passionately to eliminate quality issues at their source.
- Respond quickly to resolve any problems and satisfy our customers.
- Never sacrifice quality under any circumstance.

### For more information, see our policy on <u>Quality</u>.

# WE ARE MANY VOICES: EQUAL OPPORTUNITY

The more openly we think, the better problem-solvers we become. That's why we rely on as many different points of view as possible to move the world forward. Our Otis family includes over 68,500 distinct voices and each one is heard.

We do not discriminate, whether on the basis of race, religion, nationality, gender, age, ability, veteran status, marital status, citizenship, creed, sexual orientation or any other bias. Why? Because it's the right thing to do – and the right way to do business.

We also make sure all our hiring and promoting is based fairly on skill and performance. And as champions of diversity and inclusion, we make accommodations for employees or job candidates who are alter-abled and observe all applicable labor and employment laws.



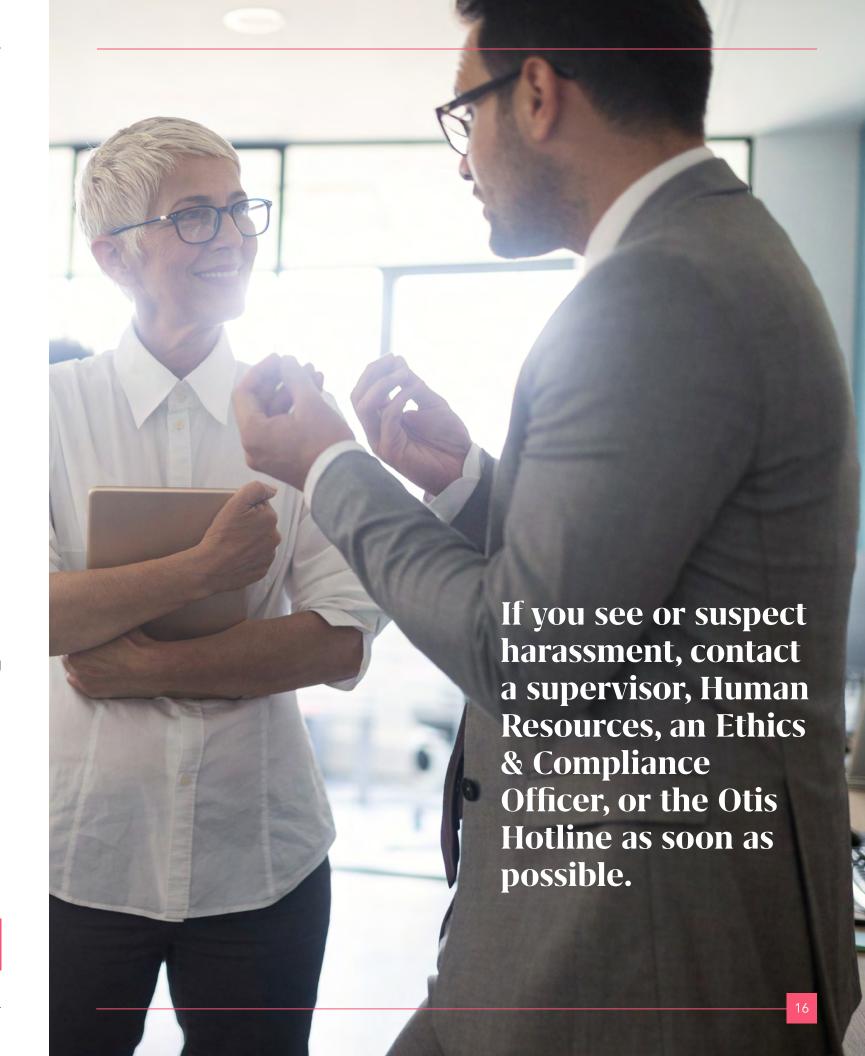
# WE ARE BETTER TOGETHER: FOSTERING A RESPECTFUL WORKPLACE

What creates a great workplace? What makes you think this is so Otis? For more than 165 years we've pioneered a safe, ethical (there are those Absolutes again!), trusting environment where we can each freely express our thoughts and ideas, ask questions and make helpful suggestions – a place where we can all do our best work.

"You can walk into an Otis facility anywhere in the world, and there's something about it that feels familiar. There's a feeling that this is Otis."

The cornerstone of all of this? **Respect.** And that's where you come in. By addressing situations that exclude or disrespect others, you put our Absolutes into action and follow the law by:

- ♦ Trusting and respecting each other, and taking action so that no one ever feels threatened or intimidated.
- Proactively discouraging any intimidating behavior and standing up to bullying and harassment.
- Reporting all forms of incivility and threats, whether or not you're the target, while promoting personal safety and empathy for others.
- Speaking up and encouraging others to do the same. Express your ideas!
  Offer your opinions! Ask questions, and listen openly to the ideas of others.



# PROTECTING OUR ENVIRONMENT

With great reach comes great responsibility. Otis works in almost every country and territory in the world, so we take our global duty towards the planet seriously by setting ambitious sustainability and conservation goals.



You have a part to play, too. We can all be catalysts of positive change to the environment by:

- Continually seeking opportunities to conserve energy, water, and materials.
- Working to design and manufacture products that meet and exceed environmental and sustainability codes and goals.
- Creating energy-efficient escalators, elevators and systems without compromising safety and quality.
- Limiting pollutants to the lowest possible levels across operations.
- Expecting suppliers to use sustainable practices.
- Staying current on permits, incidents, and waste disposal.
- If you have <u>concerns about an</u>
  <u>environmental issue</u>, contact a supervisor,
  Environmental Health & Safety (EH&S)
  professional, Ethics & Compliance Officer,
  or the Otis Hotline.

# PROTECTING HUMAN RIGHTS

Creating a world where people connect and thrive starts with basic human rights and quality of life for people around the world.

With safety, ethics and quality as our North Star, Otis respects and protects human rights everywhere we do business by:

- Ensuring safe and healthy working conditions for our employees and business partners.
- Never using forced or child labor, ever.
- Only working with suppliers who share our same standards.

When good citizenship calls, we answer – and engage with others to promote better working conditions for all.



# CONTRIBUTING TO COMMUNITIES

**Everything we do at Otis, from our lift cables to our volunteer efforts, makes modern life better.** That's a vision we take into our communities, too, drawing strength and inspiration from the places we work and live – because when our communities are stronger, we're all stronger.

To that end, we *absolutely* support participation in vibrant charitable opportunities and social improvement efforts. Become active in your communities and show support by celebrating the roles your coworkers take as volunteers, mentors, and donors, and get involved yourself by engaging in causes that have been researched.

But remember, kindly refuse anything offered in return for charitable contributions (as you'll learn about in the sections to come).



Q: I'm going to volunteer at a charity fundraiser this weekend. Is it okay if I represent myself as an Otis employee because I know the company has been a longtime supporter of this charity?

A: You should go and be proud of Otis' commitment to the organization. But discuss it ahead of time with your supervisor to understand if Otis wants an official representative at the event too.

For more information, see our <u>Charitable and Philanthropic Donations</u> Policy.

### **DOING BUSINESS GLOBALLY**

We have passengers, customers, and partners in just about every corner of the world, which means we must stay aware of (and compliant with) all relevant rules that guide global business.

This means closely following not only International Trade Compliance (ITC) rules – like import and export laws, international sanctions, embargoes, and boycotts, but also rules that thwart money laundering and terrorist financing.

The *only* smart way to quickly and safely move goods around the world (and to be paid correctly) is to follow the rules. Not doing so could cost us our work licenses, our reputation, and hefty fines. **That's why we:** 

- ♦ Find out *first* if trade between countries is restricted or subject to controls, boycotts or embargoes.
- Keep a close eye on our physical and digital technology to avoid unauthorized access, transfer or release (never letting it fall into the wrong hands).
- Double-check that all government authorizations are handled correctly.
- ♦ Screen transactions and parties for sanctions, end-use and end-user.
- Classify all exported and imported goods and value them correctly.
- Conduct business only with reputable and legitimate customers and take reasonable steps to prevent and detect suspicious payments.

When in doubt, just think about how we do business in general: the ethical way – quality and safety for the right price – or not at all.

For more information, see our <u>ITC</u> policies.

# FIERCE BUT FAIR COMPETITION

When we win, we win fairly. Remember, everything we do and make, runs on that spirit of integrity. We're constantly pushing ourselves to do better, for our customers and for ourselves.

But providing quality and safety for the right price isn't always as easy to pull off as it sounds. Competitive intelligence should come through public sources and smart thinking.

### Fierce but fair competition means:

- ♦ Dealing fairly with every customer, supplier, competitor and coworker, every day.
- ◆ Seeking competitive advantages through innovative problem solving, never through arrangements with competitors about price, discounts, sales terms, bids, or things like "I won't sell to your customer or area if you don't sell to mine."
- ♦ Staying alert when competitors are present especially at industry associations and working groups (always check-in with legal before attending, too), and avoid making inaccurate or disparaging comments about competitors.
- Never taking advantage of anyone through manipulation or by abusing confidential or proprietary information.

Doing otherwise could be against laws that protect free and fair competition (also known as antitrust or competition rules).

For more information, see our <u>Antitrust Compliance</u> Policy. If you suspect something of concern, walk away from the situation and immediately contact your legal colleagues.



Q: Before Otis, I worked for a competitor. Just recently, I saw a former colleague, and we're still friends. He's preparing a bid for a new infrastructure project and asked if Otis was planning to bid. I told my friend that I couldn't talk about that.

Was that the right answer?

A: Yes, absolutely. There should be no discussion about bids with competitors – even if you are friends. You should report this conversation to your legal department immediately.

# BRIBERY, CORRUPTION AND CHOOSING BUSINESS PARTNERS WISELY

No matter who they are, how big or small, and how much influence they have, **you must** never be persuaded by partners, businesses or anyone else to engage in bribery or corruption.

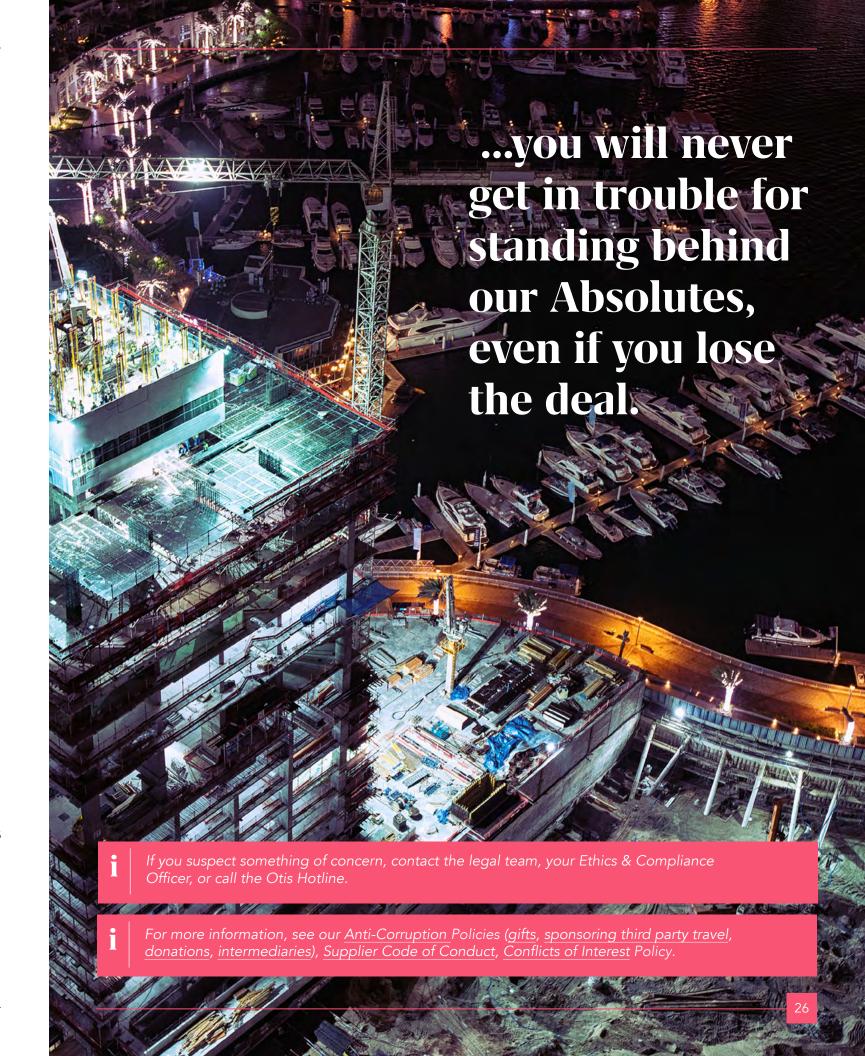
What happens if a customer offers to close a deal, but expects to get something personal in return? What if a government official promises to get things taken care of quickly, but expects a favor in return?

Giving and/or taking bribes is not only unethical and illegal, but it can also result in safety or quality requirements being bypassed (compromising all Three Absolutes at once).

As we've mentioned, you will *never* get in trouble for standing behind our Absolutes, even if you lose the deal. In fact, by preventing bribery and corruption, you not only protect Otis and yourself, you also promote an open market and lessen corruption's destructive influence – all while standing out as honorable and transparent.

Some things to keep in mind when you are working with others:

- Never improperly influence the decision of a customer or anyone else by giving something of value pride yourself on winning on merit.
- Keep business gifts and entertainment modest, occasional and in line with customary business practice (and get pre-approval before giving or receiving gifts of any kind when needed).
- Retain accurate and complete records and formalize business relationships in writing.
- Only work with likeminded partners who share our commitment to all our Absolutes and check this in advance.
- Comply with all laws, rules and regulations.
- Report any suspicions of bribery or other corruption quickly.



# CONFLICTS OF INTEREST

**Everyone has personal and professional lives.** That's just life. But sometimes they can intersect while working at Otis. Think about activities outside work, relationships at work, and personal financial interests in Otis suppliers or customers – these can create conflicting interests.

There are a lot of ways your different lives can cross paths (from mistakenly using corporate property to competing with the company) which can be a lot to think about. So, how can you tell if you're headed for a conflict of interest?

Can you (or someone close to you) benefit from what you at Otis have agreed to do, say, or provide?

Could it lead to you acting, now or later, outside the best interest of Otis?

The slightest 'yes' to any of the above may indicate a conflict of interest between your personal and professional lives. Even *apparent* conflicts can be an issue because they may lead others to think we're acting improperly or that personal interests are in conflict with our commitment to safety, ethics and quality.

Conflicts of interest must always be dealt with quickly and appropriately so that there's no perceived bias or unethical behavior. That's why it is important to speak up ahead of time, as soon as you see potential conflicts on the horizon. Only then can we take the steps necessary to resolve the situation.

Follow these tips to be aware of conflicting interests:

- Stay honest and loyal by not seeking or using for personal gain any opportunities, resources, property, or information that belongs to the company.
- Pay close attention when personal and financial connections of you (or of people close to you) may influence your work.
- Be transparent and recognize that intentions might be personally motivated rather than in Otis' interest.
- ♦ Be careful not to let your personal obligations affect your professional duties.
- Stay alert to conflicts and priorities when people in your personal life connect with your professional life.
- Speak up as soon as possible, even when in doubt, so that we can help you solve the situation quickly.



Q: My sister owns a great general contractor firm. A contract with Otis would really make a huge difference for her business. Am I allowed to recommend her?

A: Great question! It's always best to ask. We always look for the best partners for Otis and that could be your sister's firm. To make sure that all business decisions are ethical, speak to your Ethics & Compliance Officer – they'll help to guide you through the process quickly.

All actual and potential conflicts should be disclosed to your Ethics & Compliance Officer as soon as humanly possible. Our Conflicts of Interest Policy goes into further depth on this issue.

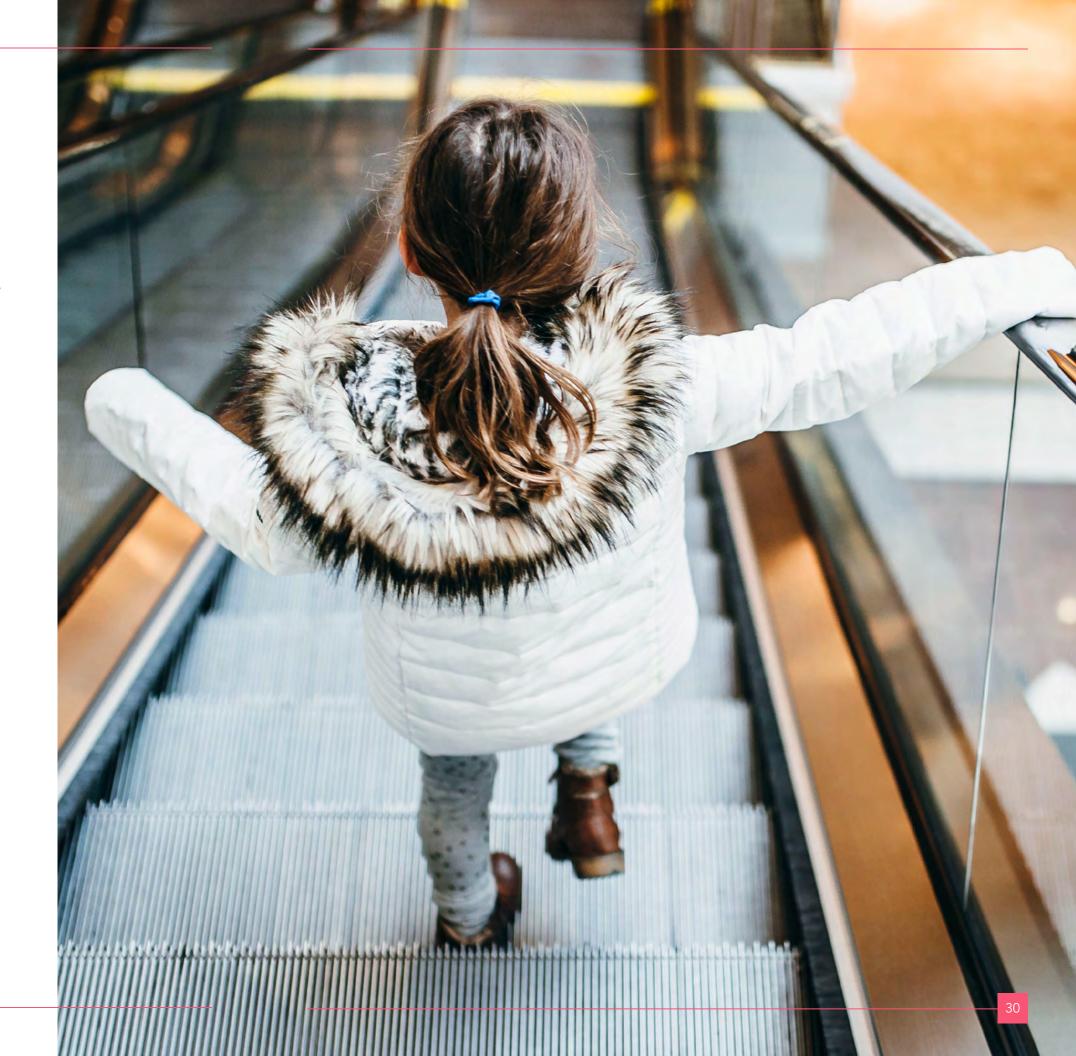
# NAVIGATING PUBLIC POLICY AND POLITICAL ACTIVITY

As a company, we sometimes work closely with governments or regulatory agencies.

Otis may have an interest in political or regulatory outcomes, and when we do, we work to advocate for our company or industry. But whenever we participate in these processes, we do so responsibly and lawfully.

We encourage and support your civic engagement, as well, while you:

- Keep your actions legal and above reproach and make it clear when you're expressing your personal views vs. views of the company.
- Tell your Ethics & Compliance Officer if you run for a political position.
- Don't make any political contributions on behalf of Otis or use company funds.
- Stay attuned to <u>lobbying rules</u>, public disclosure, and reporting requirements.



For more information, see our <u>Government Relations</u> and Lobbyist Policies.



**Through more than 165 years of innovation and hard work** we put in every day, we have created a robust portfolio of tangible and intellectual property: from assets and copyrighted material to patents, software, know-how, and trade secrets.

That's why we should all be guided by the same principle: use our assets only for legitimate business purposes. In other words, we should protect Otis assets and ensure their efficient use. It's crucial you protect these assets by:

- Staying on constant lookout for waste, carelessness and theft, and reporting any suspected misuse or risk that involves Otis assets.
- Keeping Otis' Intellectual Property (IP) and other proprietary information safe and secure.
- Telling us if you've invented something (congrats, by the way!) so we can start the patent process.
- Disclosing proprietary information even with coworkers – only if they need to know the information, and to third parties only if we protect our information through a solid contract.
- Understanding contractual or regulatory requirements so that third parties receiving our proprietary information promise to protect it.
- Nailing-down IP ownership and license rights on paper and through registration − before collaborating with others.

And just as Otis cares for its own property and assets (intellectual or otherwise), we respect the legitimate intellectual property rights of others by:

- Not soliciting, accepting, or using assets or IP of others without lawful approval.
- Always licensing the work of others that we use.
- Double-checking that we've given credit where credit is due.
- Reporting counterfeit products and other intellectual property crimes as soon as possible.

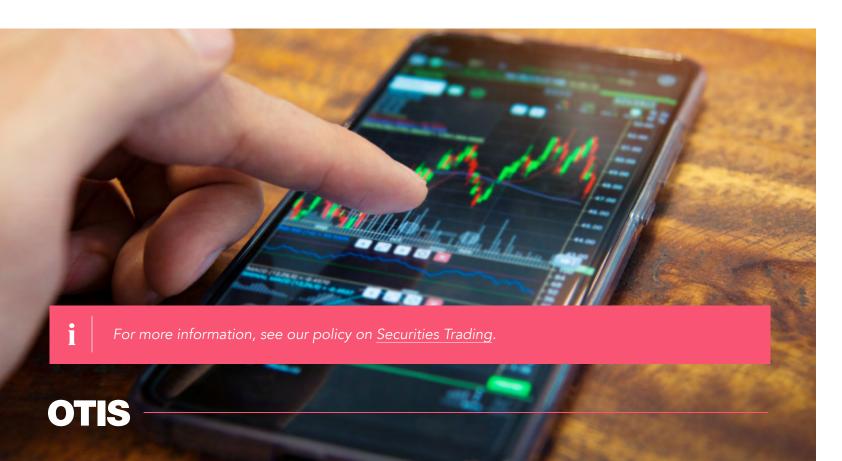
See our policies on Proprietary Information Protection and Software License for more information.

# INSIDER TRADING AND HOW TO AVOID IT

**Being an independent, publicly traded company is an honor for us.** But this honor comes with important responsibilities. When you work at Otis, you may come across information that is not known outside the company but if known could influence the stock market.

Trading stock on the basis of such important inside information is not only dishonest, it's also illegal. To stay out of the dangerous waters of dubious trading, make sure you:

- Never trade stock when you have important inside information.
- ★ Keep secret things secret, and never pass inside Otis information on to others (not even your friends and family) who could use it to boost their financial portfolio. That, too, is dishonest, and a crime.
- Wait at least two trading days before trading stock once "inside" information, like expected earnings, new products or developments, has been made fully public.
- Always ask for legal advice if you're in doubt. Penalties can be severe: fines and even prison.



# MAINTAINING ACCURATE RECORDS

Whether it's an annual report, a purchase order, a timesheet, an expense or safety report, you'll find quality recordkeeping habits behind all our smart business decisions. Shareholders also rely on accurate and transparent records to guide their investments.

Complete and accurate books and records are an essential part of an honest, ethical business. They make our business more efficient and productive. They also protect us against reputational damage and penalties.

To always be your best:

- Record transactions and events accurately and in a timely manner.
- Align budget proposals and economic evaluations fairly and clearly.
- Never engage in inaccurate, deceptive, or secret bookkeeping.
- Protect non-public and personal information you have.
- Advise customers of errors and promptly apply credits and refunds.
- Retain and dispose of records correctly, and keep all legal records safe.

Any suspected record tampering? Mention it immediately to a supervisor, Ethics & Compliance Officer, legal Department, or the Otis Hotline.

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More information can be found in our <u>Financial Manual</u>, as well as our policy on Retaining Records.

# GETTING PERSONAL, AND SERIOUS, ABOUT PERSONAL INFORMATION

Because we're in the business of connecting people, we know each other well and often share information and material: contact details, photos, data in your HR file, building access rights, and much more.

But increasingly across the globe, there are limits to what types of information you are legally allowed to share (and gather) about others. Personal information, whether it relates to you or a customer, supplier, another employee or any other individual, even passengers, is confidential.

You know what else is confidential? Any non-public information that might be of use to competitors, or harmful to Otis or its customers, if it's disclosed.

That's why we protect everyone's privacy, just as we protect our own, by:

- ♦ Collecting, using and keeping personal data only when necessary and legally allowable.
- Keeping personal information safe, and following our data security procedures closely.
- ♦ Never sharing others' personal data, inside or outside Otis, without proper permission and clearance.
- ♦ Reporting weak spots in data security and data breaches quickly.

If you suspect unusual data activity or something that could put our data security procedures in danger, contact your Ethics & Compliance Officer or Otis data privacy officer, legal colleagues, or the Otis Hotline or privacy@otis.com.

Need more detailed procedures? See our policy on <u>Personal Information</u> and our Employee Privacy Notice.



# SOCIAL MEDIA, POSSIBILITIES AND PERILS

Social media is a great way for you to connect with those we're working for and with, whether sharing information, perspectives, or just inspirational food-for-thought.

But as you know, information spreads quickly and unpredictably online and on social media, so be careful, responsible, and sensitive any time you post.

In this age of lightning-fast digital communication, every Otis voice is guided by:

- Being open and honest about our Otis identities when expressing opinions. (Think: is this sensitive, non-public or confidential?) (Is it your opinion or Otis'?).
- ◆ Considering what you're sharing, and how it could be perceived. (Is the internet really the best place for what I'm about to post?)
- Deferring to those who are specifically authorized to speak for Otis.
- Using your good judgment in refraining from disparaging or offensive remarks.
- ♦ Always channeling our Absolutes when you're using social media.



social media team?

compelling company content with your

social network when it's been cleared

and approved.

For more information, see our Social Media Policy.



Would you ever use an elevator or escalator that doesn't work properly? Of course not. That's why our passion for safety, ethics and quality is more than an ideal; it's a roadmap to achieve success in all areas of our business.

Becoming one of the world's most-respected and top-performing companies means delivering on-time, safe and defect-free technology and services, every day, in every market.

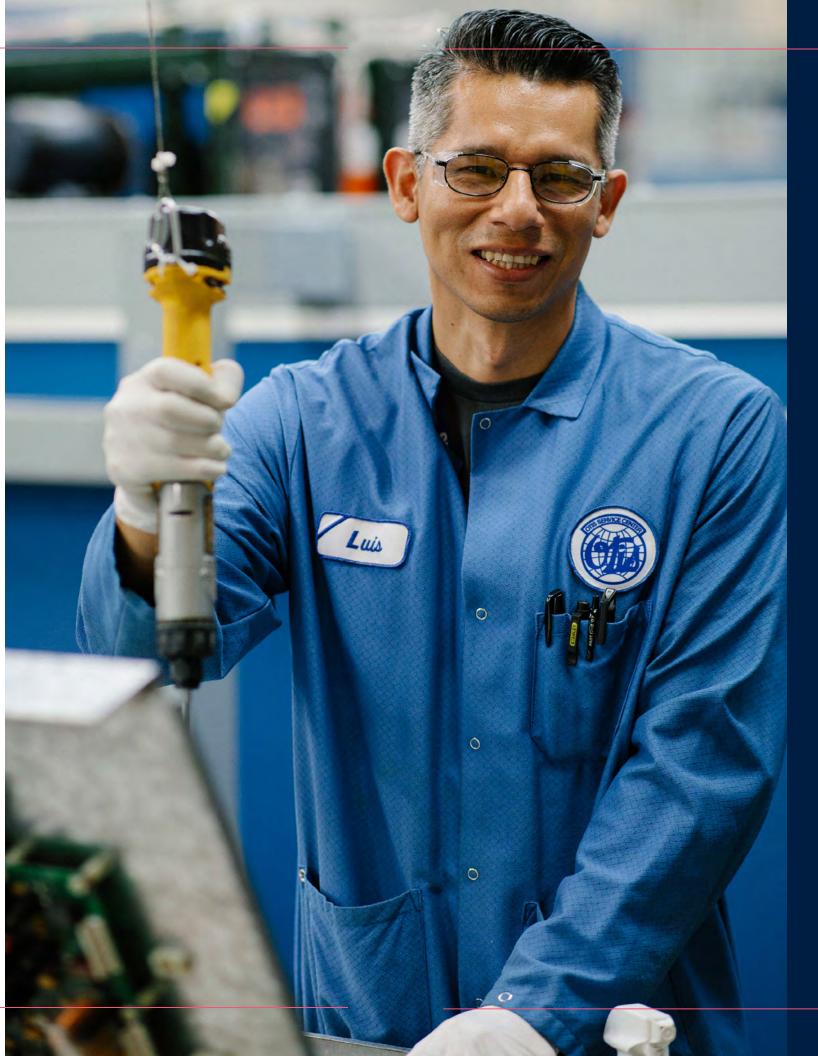
We're committed to sending all of our employees and field professionals home safely every day. And always doing it the right way, the ethical way, the Otis way.

# INFORMATION AND SUPPORT

We provide a number of great resources for you and encourage you to always get in touch and seek guidance on issues or questions you might have.

"The fact of the matter is: if you see something, speak up. You will never be in trouble for saying: 'This does not seem right'."

If you have a reason to believe something's wrong, or that the Otis Absolutes are not being upheld, or even if you just need some clarity about the Absolutes, just say so. You should; truthfully coming forward protects our Absolutes, but it also protects you. We do not accept retaliation for coming forward – because speaking up is right for our business. Again, it's simply who we are.



Help is just a phone call or email away and there are many ways to get connected. Use the one that is most comfortable for you.

**At your business:** Talk to a supervisor of any level, the HR or legal department or an Ethics & Compliance Officer.

Anonymous: If you feel more comfortable keeping your name to yourself and speaking anonymously, that is perfectly okay. And you can even do it in your own language and at any time (available 24 hours/day and 7 days/week).

- ♦ A phone call to the **Otis Hotline**
- ♦ An online form on the **Otis Web-line**
- Post a letter to <u>Global Ethics</u>
   <u>& Compliance</u> at the global headquarters.

Need to know more?
See www.otis.com/reportingchannels

Otis is the world's leading manufacturer and maintainer of elevators, escalators and moving walkways.

Founded more than 165 years ago by the inventor of the safety elevator, Otis offers products and services through its companies in more than 200 countries and territories, and maintains approximately 2 million elevators and escalators worldwide. Every day, Otis moves more than 2 billion people through the world's urban landscapes.

For more information, visit www. otis.com or follow Otis on LinkedIn, YouTube and as @OtisElevatorCo on Twitter, Facebook and Instagram.

Waiver of all or part of this document or other policies issued to implement it will be granted only in exceptional circumstances and only after approval by the Vice President, Global Ethics & Compliance. Any waivers for directors and executive officers must be approved by both the Vice President, Global Ethics & Compliance and the Board of Directors or a Board committee, and will be promptly disclosed when required by law, regulation, or Otis policy.

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