

Non-Retaliation

- A. SUMMARY
- B. APPLICABILITY
- C. POLICY
- D. PROCEDURES
- E. REFERENCES
- F. REVIEW

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 the Otis Absolutes, any policy of Otis Worldwide Corporation, or any law or regulation 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 Otis Worldwide Corporation, including its subsidiaries, divisions and any other entity it controls and all employees thereof (collectively "**Otis**"). 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 Otis employees or others for having done so.

C. POLICY

1. The Otis Absolutes require all employees at all levels to speak up in good faith when they observe actual or suspected violations of the Otis Absolutes, any Otis policy, or any law, regulation or procedure (as used throughout this Policy, "misconduct"), unless such reporting is prohibited or otherwise restricted by law. Otis similarly expects non-employees to report Otis-related misconduct to the company.

"**Good faith**" means a report made with the honest and reasonable belief that misconduct is suspected to have occurred. The company's various reporting channels, such as the Otis Hotline and Web-line, are available to employees and third parties to raise concerns.

2. Otis 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.
3. Otis 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. Otis 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

- The Otis Absolutes

F. REVIEW

The VP, Global Compliance shall review this Policy biennially.