

Otis Supplier Code of Conduct

SAFETY | ETHICS | QUALITY

everyone, everywhere, every day

At Otis, our [Absolutes](#) - Safety, Ethics, and Quality - define how we think, how we make decisions, and how we take action.

Our suppliers are critical to our success. To provide superior Otis products and services in a responsible manner, we require you, and everybody you work with, to meet our expectations for these Absolutes. Also, your contract with Otis may include more stringent or specific requirements.

SAFETY

Nothing is more important than safety – the safety of Otis personnel, our suppliers, and the public who ride our products. Safety is at the heart of everything Otis does, and we expect the same commitment to safety by our suppliers. We expect that our suppliers will:

- Assure a safe and healthy work environment for your employees and business invitees.
- Comply with all applicable environmental, health and safety rules.
- Conduct your operations in an environment friendly manner: minimize waste, emissions, energy consumption, and materials of concern.
- Provide products and services with safety as a key guiding principle.
- Comply, and ensure your shipping and packaging suppliers comply, with all requirements of Standards to Secure and Facilitate Global Trade (SAFE) Framework security programs of the destination country. For instance, the Customs-Trade Partnership Against Terrorism initiative of the United States Department of Homeland Security (C-TPAT), Authorized Economic Operator (AEO), or similar programs.

At Otis, we are determined to comply with regulatory and customer requirements regarding the prohibition and restriction of substances, including hazardous substances and conflict minerals. Therefore, you must ensure that all you provide to Otis complies with the applicable regulations. In particular, you will:

- Declare to Otis substances of concern contained in the goods you supply to us.
- Implement policy and procedural processes regarding conflict minerals and exercise due diligence to investigate the source of these minerals and, in a timely manner, address any findings of concern.
- Respond in a timely manner to Otis' requests for evidence of your compliance with these requirements.

ETHICS

Millions of people trust Otis because they know that we do business the right way: the ethical, lawful, and honest way. We expect our suppliers to operate with the same commitment to integrity. In addition to respecting the laws and regulations, **you must:**

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Respect all human rights and fair labor practices

- Provide all employees, business partners, jobseekers and potential business partners with equal opportunity without discrimination and free of discriminatory selection criteria. For instance, no discrimination based on:
 - *race, ethnicity, color;*
 - *religion;*
 - *sex, sexual orientation, sex stereotyping, pregnancy (which includes pregnancy, childbirth, and medical conditions related to pregnancy, childbirth, or breastfeeding), gender, gender identity, gender expression, national origin;*
 - *age;*
 - *mental or physical disability, medical condition, genetic information;*
 - *culture, ancestry, national origin, language, citizenship status;*
 - *socio-economic, marital, military or veteran status;*
 - *any other protected status.*
- Respect employee rights to freely associate and bargain collectively as they exist under applicable laws in the countries where you operate.
- Respect all rules prohibiting human trafficking, child labor, and modern slavery and exercise a prohibition of all forms of labor abuse for your employees and by those in your supply chain. Ensure:
 - No use of modern slavery.
 - No child labor or presence of situations where children are subjected to slavery or similar practices or engaged in hazardous work.
 - Respect of the UN Convention n° 138 on the Rights of the Child and the ILO Convention n° 182 on the Worst Forms of Child Labour. Note: Both define a child as person under the age of 18, but stricter national laws always prevail.
 - No use of other prohibited forms of labor including trafficking of persons, slavery, servitude, indentured labor, forced marriage, forced labor, debt bondage, bonded labor, involuntary prison labor, deceptive recruiting for labor or services, and child labor.
- Ensure goods and services are not mined, produced or manufactured wholly or in part with prohibited forms of labor.
- Ensure that employees can perform their work in an environment free from physical, psychological or verbal harassment or intimidation, or any other form of abusive conduct.
- Pay all workers at least the minimum wage and benefits.

Respect anti-corruption, fair competition and antitrust rules

- Only compete on the basis of the merits of your products and services.

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- Never engage in anti-competitive or unfair conduct, whether on behalf of Otis, yourself or others.
 - *Never rig bids, fix prices, share competitively sensitive information, allocate customers or markets.*
 - *Never engage in other unfair market practices.*
 - *Never make misrepresentations regarding Otis' products or services, your products or services, or the products or services of others.*
- Refrain from payments, services, gifts, entertainment or other items to create advantages which are intended to influence the way in which an Otis employee or anybody else goes about their duties.
- Do not give gifts or entertainment to Otis employees.
- Never pay a bribe or make a corrupt payment in any amount, to anyone, anywhere, for any reason whatsoever, whether on Otis' behalf, your behalf, or on behalf of others.
- Treat all employees and business partners fairly with decisions made based only on merit and other factors related to legitimate business interests, and without regard to race, religion, color, age, gender, gender identity or expression, sexual orientation, national origin, marital status, veteran status or disability.
- Avoid and report all conflicts of interest and any situations which could give the appearance or perception of a conflict of interest in your dealings with or on behalf of Otis.

Protect information and respect IP and other rights

- Respect the legitimate proprietary rights and intellectual property (IP) rights of Otis and others.
- Take proper care to protect sensitive information, including confidential, proprietary and personal information. Collect this information only when necessary and legally allowable.
- Protect all information we provide to you and information that you generate or develop in support of our programs from unauthorized access, destruction, use, modification or disclosure.
- Never use material, non-publicly disclosed information obtained during your business relationship with Otis as the basis for trading or enabling others to trade in the stock or securities of Otis or any other company.

Maintain accurate records

- Promptly and accurately record all transactions and expenses related to Otis in your books and records.

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QUALITY

Everything Otis does needs to meet the very definition of outstanding quality. We rely on our suppliers to have the same commitment and focus to quality. You must:

- Have quality assurance processes to detect, to notify Otis, and to correct defects to ensure delivery of products and services that meet all contractual, legal and regulatory requirements.
- Properly complete all inspection and testing requirements performed by appropriately authorized and qualified individuals.
- Complete required certifications accurately.

HANDLING MISCONDUCT

If you suspect or become aware of misconduct related to Otis business, you must promptly notify Otis. The easiest way is to send an email to Otis Global Ethics & Compliance at ethics@otis.com. For information on other reporting channels, including anonymous reporting, please visit www.otis.com/reportingchannels.

You must facilitate the timely discovery, investigation, and reporting of actual or suspected misconduct and implement appropriate corrective actions.

We also expect you to offer your employees and your business partners adequate reporting channels, including anonymous reporting methods and support a speak up culture where legal or ethical concerns are raised **without fear of retaliation**. You cannot take any adverse action against anyone who reports conduct that they reasonably believe to be illegal or in violation of this Code or in violation of [The Otis Absolutes](#).

COMMUNICATING AND ENSURING COMPLIANCE TO REQUIREMENTS

We expect you to promote a commitment to ethical business practices and a commitment to the expectations in this Code. This includes:

- Providing training to your employees on compliance requirements, the expectations in this Code.
- Conducting reasonable due diligence to ensure compliance.
- Ensuring timely reporting of both actual and suspected violations.

You will permit Otis and its representatives to assess your compliance with the expectations in this Code. This includes on-site inspection of facilities and review of associated books, records and other documentation. Upon request, you must provide Otis with additional information and certifications evidencing compliance.

If your contract with Otis permits you to assign, delegate, or subcontract your obligations or to procure products or services from others that will be incorporated in products or services acquired by Otis, you must flow down the principles in this Code to these business partners. We will hold you responsible for ensuring compliance by your

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business partners and you must ensure that Otis has the right to also assess your business partners' compliance with the expectations in this Code in performing work for Otis including our right for on-site inspection of facilities and review of associated books, records and other documentation.

In the event of wrongdoing, you will cooperate with Otis for a full and fair investigation. You will ensure that your business partners also fully cooperate if such investigation involves their performance. You and your business partners must correct any non-conformances identified during assessments.

Otis does not assume any duty to monitor or ensure compliance with this Code, and you agree that you are solely responsible for full compliance by your directors, officers, employees, representatives, and business partners.

QUESTIONS ?

For questions or concerns about this Code, you can contact your Otis Supply Chain representative or Otis Global Ethics & Compliance at ethics@otis.com.