

Conflict Minerals policy governing the Otis Supply Chain

A. <u>SUMMARY</u>

As declared in the <u>Otis Absolutes</u>, creating a world where people connect and thrive starts with basic human rights and quality of life around the world. Otis is committed to these principals and to contribute to the elimination of human rights violations in the Democratic Republic of Congo (DRC) region funded by armed groups in the trade of Conflict Minerals. To that end, Otis shall maintain a Conflict Minerals program.

B. <u>APPLICABILITY</u>

This Policy applies to Otis Worldwide Corporation, its regions, subsidiaries, divisions, and other controlled business entities and operations and all directors, officers, employees thereof, worldwide (collectively "**Otis**").

C. **DEFINITIONS**

- "Conflict Minerals" as defined by Section 1502 of the Dodd-Frank Act, includes tantalum, tin, tungsten, and gold, also known as 3TG.
- "OECD" means Organisation for Economic Co-operation and Development
- "Supplier(s)" any entity or individual that provides goods or services to Otis

D. POLICY

- 1. Otis shall not do business with any Supplier, individual, or entity that it knows has a demonstrated or reputed inability or unwillingness to comply with the principles of the Otis Supplier Code of Conduct or applicable law.
- 2. Otis will maintain a comprehensive Conflict Minerals program that is designed based on the 5-step framework issued by the OECD. This Conflict Minerals program will take a risk-based approach that includes risk identification, assessment, mitigation and due diligence.
- 3. The Conflict Minerals program will meet the criteria of, but not limited to, the following legislative and regulatory acts:
 - Section 1502 of the Dodd-Frank Act

E. <u>RESPONSIBILITIES</u>

The VP, Global Supply Chain is responsible for interpretation and will review this Policy every two years.

F. <u>REFERENCES</u>

- 1. The Otis Absolutes
- 2. <u>Supplier Code of Conduct</u>
- 3. <u>OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (2016)</u>