



THE CARRIER WAY  
OUR CODE OF ETHICS

# MESSAGE FROM DAVE GITLIN

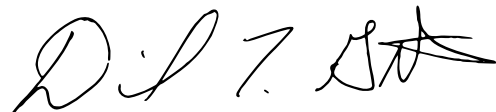
At Carrier, we demand high performance *and* high integrity from all of our employees as well as everyone with whom we do business.

It is never acceptable to compromise our values or integrity to achieve our business objectives.

We are a company committed to always doing the right thing.

No exceptions.

**Dave**

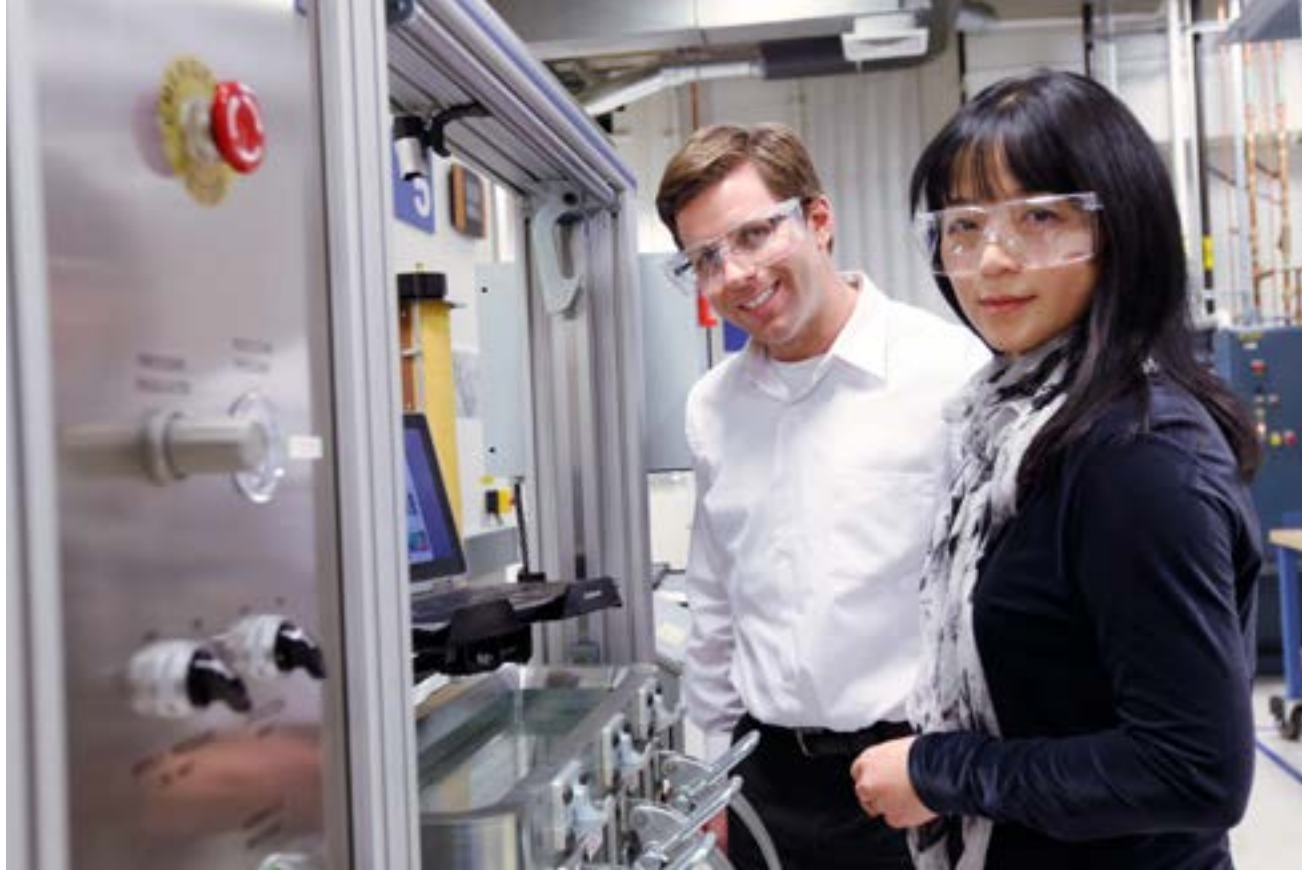
A handwritten signature in black ink, appearing to read "D. Gitlin".

Chairman & CEO, Carrier



# CONTENTS

|   |    |
|---|----|
| About Our Code  | 3  |
| We Are Stronger Together  | 12 |
| We Deliver for Our Customers – On the Merits of Our Products and Services | 21 |
| We Are Responsible Stewards for Our Investors                             | 32 |
| We Build Enduring Partnerships  | 43 |
| We Are Engaged in Our Communities   | 46 |



## ABOUT OUR CODE

|                                      |    |
|--------------------------------------|----|
| Strength Through Values              | 4  |
| Values in Action                     | 5  |
| Our Responsibilities                 | 6  |
| Making Ethical Decisions             | 7  |
| Speaking Up and Seeking Help         | 8  |
| How We Uphold the Code               | 9  |
| Waivers                              | 10 |
| A Legacy of Innovation and Integrity | 11 |

# STRENGTH THROUGH VALUES

We are diverse and united by a common purpose and shared values.

We create and develop new and better ways to keep people safe, comfortable, and on the move.

We cultivate strength through **Inclusion**, deliver with **Excellence**, grow through **Innovation**, treat others with **Respect**, and act with **Integrity** in everything we do.

Our Company's success is driven by the talent, skill, and dedication of our people. We respect and value each other as individuals and recognize that we can only reach our fullest potential together. As we operate around the clock and around the globe, the conditions and challenges we face may vary; our core values do not. Our values demand that we act transparently and never resort to lying, cheating, stealing, or any other form of deception.

Our values connect, guide, and empower all of us. They define who we are, what we stand for, and how we do business. In a complex, dynamic business environment, where pressures are intense and challenges often unique, our values bring us clarity and consistency, and bind us closer together. Our values help us achieve the high standards of quality, safety, and performance that our customers expect and deserve. They guide us even when there isn't an applicable rule. In short, our values unite us as we perform our jobs.

## **We make modern life possible**

Our global businesses power building systems industries.

## **Our Values, Your Values**

Our global Code of Ethics was created with the input of thousands of employees. It builds on the enterprise-wide effort we have made to better understand our culture and the values that guide how we operate.

We not only understand the importance of achieving our goals the right way, but we are also committed to making it an everyday reality. Our global Code of Ethics reflects and reinforces that commitment.

### **RESPECT**

We treat others the way we want to be treated.

### **INTEGRITY**

We put honesty, accountability, and ethics first.

### **INCLUSION**

We strive to create an environment where all feel included, regardless of our differences.

### **INNOVATION**

We constantly seek to develop, improve and sustainably grow.

### **EXCELLENCE**

We deliver on the merits of our products and services, with urgency and flawless execution.

Our Code of Ethics is a practical resource to help us protect and propel our business and improve our individual performance.

Our Code of Ethics is a resource for all of us. It is our global Code of Ethics and applies to all our directors, officers, and employees, as well as representatives of our Company and our subsidiaries and affiliates throughout the world. As a tool and a guide to achieving our goals the right way, this Code:

- Integrates our core values throughout, reminding us that our everyday decisions become easier when we use our values—Respect, Integrity, Inclusion, Innovation, and Excellence—to make them
- Covers the key policies, requirements, and responsibilities we must embrace
- Explains how we can seek help when faced with concerns or difficult decisions
- Requires us to act honestly and avoid all forms of evasion or deception
- Forms the cornerstone of our Ethics & Compliance program

## Defining Our Values

**Respect. Integrity. Inclusion. Innovation. Excellence.** By embodying these values in every decision we make and in every action we take, we:

- Foster a culture that encourages collaboration and sustainable growth and helps prevent critical mistakes
- Strive to be the best we can be, always aiming for success but never compromising our values
- Protect our hard-earned reputation by conducting business in an ethical and legally responsible way, wherever we are operating
- Strengthen our relationships with business partners and other stakeholders based on the merits of our products and services
- Enhance our ability to attract and retain employees who share our high standards and recognize that businesses most often succeed because of—not in spite of—doing the right thing

We are each responsible for following this Code and our Company policies, seeking guidance when we have concerns, and reporting any actual or potential violations.

Our Company's success depends on the individual actions of our directors, officers, employees, and representatives all over the world. Therefore, we are each personally responsible for:

- Upholding our core values and understanding and complying with our Code of Ethics
- Ensuring our actions are in full compliance with the letter and spirit of all applicable laws and regulations
- Keeping our commitments to our stakeholders and leading by example
- Reporting anything that is, or appears to be, a violation of our Code or our values

Retaliating against anyone who makes a report in good faith is not only prohibited, but will lead to disciplinary action.

## Special Responsibilities for Leaders and Supervisors

If we lead or supervise employees, or manage business partners, we must lead by example and:

- Cultivate a positive work environment and business relationship, where only legal and ethical actions that reflect our core values are acceptable
- Never ask anyone—employee or business partner—to do anything that would compromise our standards
- Regularly communicate the importance of following the Code, policies, and procedures, and upholding our values—stressing that the means are always as important as the ends
- Take responsibility for the conduct and actions of ourselves and our employees, and own implementation of compliance initiatives and training
- Provide training that helps employees understand their responsibilities, develop their leadership skills, and advance their careers and relationships ethically
- Be proactive in encouraging and supporting employees and business partners to come forward with ideas and concerns
- Respond promptly and respectfully to concerns by addressing the current situation and preventing future issues from arising, or by seeking appropriate assistance
- Refrain at all times from participating in or condoning conduct that would violate applicable laws or this Code of Ethics
- Never engage in or tolerate retaliation
- Question success, not just failure, from time to time, especially if the result seems too good to be true
- Publicly recognize those who did the right thing, especially when it took courage to do so
- Talk openly and proactively with your team about risk, especially when operating in difficult environments or under pressure, equip them with tools to mitigate, and reinforce the need to ask for help if needed

Ethical decision-making requires that you ask yourself and answer “yes” to two fundamental questions, *before you act*:

- 1: Can I?**  
Is the contemplated course of action compliant with the letter and spirit of the law and Company policy?
- 2: Should I?**  
Is the contemplated course of action consistent with the Company’s core values and reputation?

When answering these questions, be sure to understand all the pertinent facts, consider duties to affected stakeholders, and think about potential alternatives. You also must involve the right people to help you, including your Ethics & Compliance Officer, Human Resources manager, and subject-matter experts (e.g., technical, engineering, quality, operational, and legal professionals).

Even though our Code will help you make a wide variety of decisions, consult [Carrier's policies](#) for detailed information about what we can and should do.



There are numerous resources available to help us fulfill our responsibilities to report potential violations in good faith and seek guidance on ethical questions. We do not tolerate retaliation against those who report in good faith.

If we witness or suspect violations of the law, this Code, or our values, we must speak up as soon as possible. Reports can be made to a supervisor of any level, the Legal Department, an Ethics & Compliance Officer, or Human Resources. If we need to make the report confidentially, we can also use the the Company's Anonymous Reporting Program. Even though making a report anonymously is possible (where permitted by local law), we encourage people to identify themselves because doing so can assist with investigations and follow-up.

Regardless of how a report is made, and what results from it, retaliation is prohibited. **Our Company has zero tolerance for all forms of retaliation against those who make a report in good faith or who cooperate with an investigation.** This does not mean you must know all the facts or have complete certainty that a violation occurred; "in good faith" means you have a reasonable basis to believe a violation may have occurred, and you are respectful and truthful in reporting it. Any acts of retaliation will result in discipline, up to and including termination.

The fact of the matter is, if you see something and you say something, there will be no retribution. You will not get in trouble—even if what you're reporting proves not to be the case. You may have a hard time believing that, but it's true. We welcome people raising their hands and asking questions—even the hard questions.

# HOW WE UPHOLD THE CODE

We audit our operations on a regular basis to ensure compliance and continuous improvement. All reports of violations are investigated thoroughly, fairly, and impartially with the objective of identifying actions for continuous improvement.

Using teams of internal and external experts, our Company audits its operating entities on a regular basis to ensure compliance with the Code and Company policy. From time to time, we may also audit our business partners. Audits, whether announced or unannounced, will culminate in a report that is shared with appropriate stakeholders to facilitate continuous improvement.

When an actual or potential violation of law, the Code, or Company policy is reported or detected, the Ethics & Compliance Office will conduct a timely and thorough investigation in compliance with the law. Every effort will be made to get all sides of the story, while also maintaining confidentiality to the greatest extent possible, as well as attorney-client privilege when the investigation is being done at the direction of legal counsel.

Our Company commits to treating all parties involved in an audit or investigation with respect. To protect confidentiality or address other concerns, there may be times when the details of issues being investigated are not shared with all parties. All employees and business partners must be truthful and fully cooperate with audits and investigations, except where applicable laws limit mandatory cooperation. Cooperation may include participating in interviews and providing documents.

If a violation has occurred or the subject of an audit or investigation has been untruthful or otherwise uncooperative, appropriate disciplinary measures will be taken. Such measures may include counseling, warnings, suspension, termination, reimbursement of losses, or even referral for criminal prosecution. The Ethics & Compliance Office and Human Resources will participate in the disciplinary proceedings to ensure due process and consistent treatment for all employees.

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

# A LEGACY OF INNOVATION AND INTEGRITY

Our founders laid the groundwork for our long history of inventing and developing transformative products that offer unprecedented levels of safety, performance, convenience, and comfort. Each founder demanded high standards of quality and ethics, creating a tradition that we proudly follow and build on to this day.

Our businesses were founded by visionaries whose innovations created or significantly expanded an entire industry.

For example, human beings lived at the mercy of heat and humidity indoors until 1902, when Willis Carrier invented the world's first air conditioner. He started an industry that today keeps millions of people comfortable and safe in extreme temperatures, while also protecting food and medical supplies. Carrier continues to lead the way with next-generation, energy-efficient technologies aimed at protecting our environment as well as the people living in it.

Fires could spread quickly and with devastating results on ships at sea until 1918, when Walter Kidde created the first smoke detection and carbon dioxide fire extinguishing systems for ships. Five years later he invented the first portable carbon dioxide fire extinguisher. Today, Kidde Home Safety products help to stop accidents from turning into tragedies, with cutting-edge fire detection and suppression technologies. Kidde also carries on its founder's legacy of caring, with community initiatives and nonprofit partnerships. Each year, it gives out more than 100,000 free carbon monoxide and smoke detectors.

Locks were relatively easy to pick, until brothers Jeremiah and Charles Chubb invented the first Detector Lock in 1818. The lock was so effective that the brothers became a household name in protection and safety. Their business eventually grew beyond locks and safes to fire safety and security systems. Today, Chubb is a trusted leader with a history of accolades, including the Millennium Award for Design and Technology, the International Fire Expo Award for Innovation, and the Metropolitan Police Award for Intruder Alarm Performance.



## WE ARE STRONGER TOGETHER

We are united by our belief in each other. We expect mutual respect and inclusion in our workplaces, understanding we can succeed only as a team. We stand by our policies and safeguards to ensure we are all protected and supported in reaching our full potential.

|  |    |
|--|----|
| Fostering a Respectful Workplace             | 13 |
| Keeping Workplaces Safe, Secure, and Healthy | 15 |
| Embracing Diversity and Inclusion            | 17 |
| Promoting Equal Opportunity                  | 18 |
| Protecting Personal Information              | 19 |
| Using Social Media Responsibly               | 20 |

# FOSTERING A RESPECTFUL WORKPLACE

We live our commitment to inclusion and respect by taking action to ensure that no one feels threatened or intimidated in our workplaces.

## WHY IT MATTERS

When we engage others with respect and refuse to allow bullying or harassment, we create a positive work environment in which we can all express our thoughts and ideas, ask questions, make constructive suggestions, and reach our full potential. This allows innovation, creativity, and performance to thrive while also promoting inclusion and collaboration. By holding ourselves accountable for recognizing and addressing situations that make others feel excluded, disrespected, or intimidated, we live our values and uphold the law.

## HOW WE MAKE IT POSSIBLE

Our Company is committed to providing workplaces free from harassment, bullying, threats, and violence. We can each play a role by:

- Proactively discouraging behavior that degrades, disparages, or intimidates others
- Encouraging others to speak up, express their ideas and opinions, ask questions, and listen openly to suggestions and ideas
- Reporting all forms of harassment, whether or not we are the direct target of the conduct
- Promoting personal safety and reporting any acts or threats of violence
- Showing empathy for others and treating them with dignity
- Complying with all anti-harassment laws and regulations

If you witness or suspect harassment, contact a supervisor, Human Resources, or an Ethics & Compliance Officer, or use the Company Anonymous Reporting Program immediately. If you witness or suspect an act or threat of violence or believe violence is imminent, warn anyone in harm's way, remove yourself from possible harm, and contact Security immediately. Also, inform your supervisor, Human Resources, or a Compliance Officer, or use the Company Anonymous Reporting Program as soon as possible.

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**Q:** What should I do if I think one of my coworkers is being harassed, but I don't hear that person ever complain about it?

**A:** If you are comfortable doing so, you can start by speaking with the coworker about the situation. If that coworker refuses to make a report, but you still suspect harassment is taking place, contact your supervisor, Human Resources, or, if you wish to discuss the situation confidentially and identify the options available to you, please use the Company Anonymous Reporting Program. An investigation can be made discreetly. If harassment is discovered, you'd not only be protecting your coworker, but other possible victims of the harasser as well.

## Harassment

Harassment is words or actions that create an intimidating, hostile, or offensive work environment. Whether it's in person or online, harassment isn't just what's intended, but how others perceive it. It can be:

- **What a person says or writes**, including racial, ethnic, or gender-based slurs, jokes, or stereotypes as well as threatening, loud, or abusive language
- **What a person does**, such as unwelcome touching, making sexual advances, blocking someone's path, ignoring someone, or deliberately humiliating someone
- **What a person displays**, such as placing lewd photos or derogatory slogans on a workstation or sharing them electronically

# KEEPING WORKPLACES SAFE, SECURE, AND HEALTHY

The health and safety of every person who enters our workplaces is our highest priority.

### WHY IT MATTERS

As a manufacturer and service provider that keeps millions of people safe, comfortable, and productive, we are trusted to put safety first. This begins with taking personal responsibility for protecting the health and safety of our coworkers, business partners, our visitors, and ourselves. If we have a safe workplace, we can focus on innovations to provide solutions that make modern life possible. Safety is at the heart of our commitment to integrity.

### HOW WE MAKE IT POSSIBLE

Our goal is to ensure workplace safety and prevent all injuries or threats to anyone on Company premises or jobsites. This means we:

- Follow all safety guidelines, policies, and laws
- Look out for each other and help others to work safely
- Prohibit drugs, alcohol, weapons, or violence in the workplace
- Respect all physical security procedures, including access to facilities and use of employee badges
- Promptly report all injuries, hazards, threats, and close calls so they can be investigated, addressed, and prevented in the future

**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 with your supervisor or Human Resources, you can be sure you are properly evaluated and observed, for the sake of everyone's safety.

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## **Drugs & Alcohol**

All Company entities worldwide abide by applicable laws and regulations regarding possession or use of alcohol, drugs, and other controlled substances. Our Company prohibits the use, sale, purchase, transfer, possession, or presence in one's system of controlled drugs on Company premises. Local management has the authority to decide if alcohol can be served on Company premises. It is never acceptable to be under the influence of drugs or alcohol on Company property or at Company events.

## **Tobacco-Free Workplace**

Use of tobacco and other smoking materials and exposure to second-hand smoke are recognized health hazards. Accordingly, all Carrier properties are tobacco-free. Tobacco products include cigarettes, cigars, pipes, electronic cigarettes, and smokeless tobacco (e.g., chewing tobacco, snuff). Tobacco products are not permitted to be used inside any Carrier building or vehicle or on Carrier property.

## **Beyond the Minimum**

Our first goal for all employees is that they go home safe, every day. For us, safety means more than just avoiding accidents. It's also about improving environmental conditions, enhancing air quality at our facilities, and encouraging healthier lifestyles. Using available technologies, we often go beyond regulatory safety standards, such as in our ongoing effort to reduce manufacturing noise in our facilities to levels where employees do not need to wear ear protection.

# EMBRACING DIVERSITY AND INCLUSION

Our greatest asset is the talent and diversity of our people and their creativity and ideas. We encourage and support all constructive and respectful ideas, questions, and viewpoints.

## WHY IT MATTERS

Inclusion is one of the values that guides us. Our success as a global building systems leader relies on the unique talents, perspectives, and experiences of our people. Their vast array of skills is what fuels innovation and creates smart, sustainable solutions for our customers and the world. Our commitment to inclusion allows all of us to participate in and contribute to our success. By embracing diversity with openness and trust, we improve our ability to relate to and work with each other and with our customers, business partners, and communities, everywhere we do business.

## HOW WE MAKE IT POSSIBLE

Our Company actively promotes diversity and inclusion everywhere we work and live. This means we:

- Treat each other with respect and make sure everyone's voice is heard
- Encourage each other to Speak Up and share new ideas
- Support initiatives that foster workplace diversity
- Make accommodations for employees or job candidates with disabilities
- Comply with all applicable labor and employment laws

**Q:** A candidate for a Logistics Specialist position appears to have great management skills, but I'm concerned about his ability to deliver customer support because he has a disability. What should I do?

**A:** Consider whether technology is available that can mitigate potential customer-support issues. You might be surprised at how easily the candidate can adapt to different situations. It's also a good idea to contact Human Resources as well as leadership in your business unit for guidance about the job requirements and whether accommodations could be made to bring this candidate onboard.

Everyone has the same chance to succeed based on their merits and measurable skills, without any discrimination.

**WHY IT MATTERS**

When we are honest and transparent about our hiring and advancement standards, we strengthen trust among our workforce and enhance our reputation as a company with integrity. Promoting equal opportunity allows us to attract and retain the best people for the job and optimize our pursuit of excellence. It leads to more satisfied and productive employees and to more innovative and dependable products.

**HOW WE MAKE IT POSSIBLE**

Our Company makes hiring and promotion decisions based only on fair, unbiased evaluations of skills, work history, and performance. We prohibit discrimination based on any unlawful basis, including:

- Race
- Color
- Religion
- National origin
- Gender
- Age
- Disability
- Veteran status
- Marital status
- Citizenship status
- Creed
- Sexual orientation
- Other protected categories as provided by applicable law

We will also provide reasonable accommodations for disabled employees or those with specific religious requirements, if necessary.

# PROTECTING PERSONAL INFORMATION

We protect the privacy of personal information by not disclosing it to anyone without a legitimate business need and legal right to receive and use it.

### WHY IT MATTERS

Our Company handles personal information with respect and in accordance with appropriate safeguards. By treating personal information with proper protections, we not only uphold our legal obligations, we also protect each other and our Company's reputation.

### HOW WE MAKE IT POSSIBLE

We protect the personal information of our employees and others by:

- Following all policies and procedures covering personal information
- Never sharing others' personal information with anyone, inside or outside the Company, without proper clearance and a clear business need
- Collecting and storing personal information only when and as long as necessary and legally allowable
- Following all applicable data privacy laws

### Personal Information

Personal information means information relating to an identified or identifiable natural person but excluding anonymous aggregate information.

**Q:** My supervisor asked me to work with a service provider to create a team directory listing the employees working on my project. She wants me to provide each employee's name, work telephone number, work email address, home telephone number, and photograph to facilitate communication, teamwork, and sharing of contact information in case of a crisis. Should I create and provide that list to the service provider?

**A:** Not before completing the Privacy Impact Assessment. All of the information requested is Personal Information. The Policy Manual defines *Personal Information* as data that relates to an identified or identifiable person. Before collecting or sharing HR Personal Information, be sure to follow the Company's standard work policy to confirm that collection and sharing are appropriate. If you have any questions, consult your Privacy Professional.

# USING SOCIAL MEDIA RESPONSIBLY

We embrace the responsible use of social media for business purposes, making sure our individual online activities do not harm our Company.

## WHY IT MATTERS

Social media gives us remarkable abilities to connect with colleagues, share information, and influence opinion. We must use these tools responsibly because information can spread quickly and unpredictably online. We respect every individual's right to free speech and creative expression. However, we also recognize our duty to protect the reputation and interests of the Company. By never using the Company's name or our position improperly, and by taking great care to protect sensitive information, we ensure our Company and our colleagues will not be harmed by our online activities.

## HOW WE MAKE IT POSSIBLE

We are cautious on social media and avoid posting anything that could reflect badly on our Company. This means we:

- Are open and honest about our identities as employees and make it clear when we are expressing personal opinions, not the Company's views
- Do not post sensitive information about the Company—only employees who are specifically authorized to speak on behalf of the Company may do so
- Do not disclose the nonpublic information of our Company, customers, suppliers, or business partners without appropriate authority and approval
- Do not unfairly disparage others, or post content that is offensive or obscene
- Take time to consider how posts might reflect on our Company, coworkers, business partners, or customers before sharing them—never share a coworker's personal information, photos, or videos
- Never let social media activities interfere with your job

**Q:** We just released a cool video explaining a breakthrough technology. Can I tweet a link to the video, or should I just leave that to our social media team?

**A:** As long as you're certain it was cleared for public release, and you are forthright in your tweet and Twitter profile about being an employee, we encourage you to share compelling Company content within your social network.



## We Deliver for Our Customers – On the Merits of Our Products and Services

We set ambitious goals and deliver what we promise. We understand our customers have a choice, and we have to continuously earn their trust through constant innovation and delivery on our promises. We vigorously compete to win, but always with integrity and never contrary to our values, ethical standards, or the law. We exceed expectations on the strength of our people, our products, and our services.

|   |    |
|---|----|
| Delivering Safe, High-Quality Products and Services | 22 |
| Dealing Fairly and Honestly                         | 23 |
| Serving the Government                              | 24 |
| Competing Vigorously and Legally                    | 26 |
| Gathering Competitive Intelligence                  | 28 |
| Doing Business Globally                             | 29 |
| Preventing Bribery and Corruption                   | 30 |

# DELIVERING SAFE, HIGH-QUALITY PRODUCTS AND SERVICES

We refuse to compromise on safety or the quality of our products and services.

### WHY IT MATTERS

Since 1818 when the Chubb brothers patented their secure lock mechanism, our Company has been developing innovative, high-performing, and groundbreaking products that protect and save lives. Millions of people rely on our climate control and security systems to keep them comfortable and safe on the ground and at sea. This means we have an enormous responsibility—not just to our customers, but to the people they serve as well. We embrace this responsibility wholeheartedly, every day, by demanding high standards of performance in every product we make and every service we perform.

### HOW WE MAKE IT POSSIBLE

We earn our customers' trust by delivering the safest, highest-quality products and services possible. This means we:

- Make safety our top priority in everything we design, manufacture, deliver, install, maintain, and repair
- Design our products and services to meet or exceed government regulations and industry standards
- Complete all required inspections and testing accurately and on time, ensuring all documentation is current, accurate, and complete
- Give all employees the authority and responsibility to raise issues with their supervision about safety or quality, even if it could stop production or delivery
- Foster constant improvement through the culture and tools of our ACE (Achieving Competitive Excellence) operating system

### ACE

Our ACE (Achieving Competitive Excellence) operating system drives competitive excellence in all our business units. It relies on the daily interaction of culture, tools, and competency to improve operating performance. Results focus on highly engaged employees working in a safe environment to produce perfect quality products delivered on time.

We are fair, truthful,  
and transparent in  
the marketplace.

## WHY IT MATTERS

Our founders built a tradition of trust with their customers and business partners on a reputation for integrity and honesty that continues today. Competitors respect us because we compete vigorously, fairly, and legally. We honor and build on that tradition by our words and actions in all of our business dealings, no matter where or with whom. Our customers need to know exactly what they are getting, and when they are getting it. They deserve candid assessments of our products' capabilities and limitations. Anything less could not only lead to customer dissatisfaction, it could endanger lives if critical components fail in service.

## HOW WE MAKE IT POSSIBLE

We deal fairly with customers, our business partners, and competitors by:

- Selling and marketing our products honestly and on their merits
- Complying with the letter and spirit of all applicable laws and regulations
- Not making inaccurate or disparaging statements about competitors
- Requiring all our key representatives to comply with these requirements



We value our government customers and fully comply with the unique rules and regulations that apply to each of them.

## WHY IT MATTERS

We work closely with many government entities worldwide. Each has specific rules and regulations we must follow regarding how we compete for and obtain contracts, which costs can be included in our prices, and what we deliver—including product testing and inspections. By competing fairly for contracts on the merits of our products and offerings, and by complying with applicable rules, regulations, contract requirements, and laws, we serve our government customers and give them confidence that they have chosen the right supplier.

## HOW WE MAKE IT POSSIBLE

Our Company follows all laws, rules, and regulations when working with government customers by:

- Adhering to fair bidding, pricing, and quality standards
- Ensuring accurate accounting practices and claiming only allowable costs
- Making sure all proposals, quotes, invoices, tests, certifications, communications, and any other required documentation with government customers are current, accurate, and complete
- Not seeking or using unauthorized information about competitors and competing bids
- Complying with the procurement laws and regulations of our government customers in and outside of the United States
- Abiding by restrictions on gifts and job offers to government officials and their relatives
- Protecting government information and property through proper storage, tracking, and security

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**Q:** My job requires that I inspect 100 percent of the products going through the production line. Rarely do parts get rejected. Production would be faster, and delivery to customers would be timelier, if I inspected 10 percent of the parts. Can I use my judgment and reduce the number of parts that I inspect?

**A:** Quality requirements must be followed at all times. Our customers expect all of our employees to perform their jobs accurately and thoroughly, especially when it comes to quality. You must continue to follow the job requirements, but you may have an innovative solution to improve production times and inspections. Discuss your ideas with your supervisor or process improvement representative. Until the requirements change, however, you are expected to perform all required inspections.

# COMPETING VIGOROUSLY AND LEGALLY

We comply with all competition laws wherever we do business.

## WHY IT MATTERS

Competition fosters better products and services, driving us to be more efficient and more innovative. It is good for us, and for our customers, who receive better value. At the same time, collusion and anti-competitive practices, such as bid-rigging or price fixing, poison the marketplace. They lead to excessive prices and substandard products and services. When they involve government contracts, they also cheat taxpayers and can harm government customers. Well over 100 countries now have laws that make anti-competitive conduct illegal. Regardless of where we do business, anti-competitive activities are always a violation of our core values. They can also result in severe civil or criminal penalties for companies and individuals. We compete vigorously and legally, not only because it's good for our business and reputation, but because it's the right thing to do.

## HOW WE MAKE IT POSSIBLE

We comply with all applicable competition (or "antitrust" or "anti-monopoly") laws by:

- Not discussing or making agreements with competitors about:
  - Markets
  - Territories
  - Pricing
  - Contracts
  - Bids or quotes
  - Production
  - Customers
  - Costs
  - Inventory
  - Capacity
  - Boycotts
  - Profits
  - Margins
  - Marketing strategies
- Never sharing details about bids or quotes with anyone other than the customer unless it is lawful and there is a specific business need to know (e.g., due to teaming or subcontractor arrangements)
- Avoiding even the appearance of improper agreements with competitors
- Consulting with the Legal Department before engaging in commercial practices that could have the effect of harming competition (such as, but not limited to, bundling or tying arrangements, price discrimination, predatory pricing, exclusive dealing contracts, and refusal to supply our competitors)

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**Q:** I was at a building systems conference networking event recently. During the hosted reception, some of us were talking and a competitor brought up a new marketing campaign her company is promoting on YouTube. Some of the videos have already been posted, so they're public, but I still felt uncomfortable about the topic and decided to leave the conversation. Was that the right thing to do?

**A:** Conferences and trade shows are important resources for staying current in our industry, but they can also create situations that can lead to competition law violations—often inadvertently. While discussing public ads is not necessarily a violation, the conversation could have easily turned to the long-term marketing strategy that prompted the campaign, or to future plans. You did the right thing by moving on. If you ever find yourself in a situation that makes you concerned about competition laws, you should express that you think the conversation may be inappropriate, excuse yourself, and contact the Legal Department as soon as possible.

### Interactions with Competitors

Most Carrier employees should not meet with competitors and those that do should do so for authorized purposes (e.g., attending a code or safety committee of an industry association). When interacting with competitors for an authorized purpose or encountering them incidentally (e.g., at a trade show or customer pre-bid meeting), do not discuss:

- Prices, discounts, markups, credit terms, or any conditions of sale
- A company's costs, capacity, production, inventory or distribution
- Anything that directly or indirectly relates to a company's bidding procedures or plans
- Any matters related to territorial restrictions or other types of market division (such as customer allocation)
- Nonpublic business, strategic, or marketing plans
- Customer-specific information
- Refusing to do business with third parties (such as customers, competitors, or suppliers)

# GATHERING COMPETITIVE INTELLIGENCE

We learn and gather information about our marketplace and competitors only through legal and ethical means.

## WHY IT MATTERS

In our dynamic and challenging global marketplace, we have a duty to learn all we can about our competition. This helps us hone our products, recognize industry trends, and anticipate the changing needs of our customers. But as important as this information is, we would never compromise our integrity by improperly seeking or obtaining competitively sensitive or other nonpublic proprietary information. Instead, we treat our competitors the way we want them to treat us: fairly and honestly.

## HOW WE MAKE IT POSSIBLE

We gather competitive intelligence legally and ethically by:

- Seeking information through public sources, such as news media, industry surveys, financial reports, observations of public property, and publicly accessible Internet sites
- Seeking information from customers about how we can be more competitive
- Never inducing people to breach their confidentiality obligations
- Never using deception to obtain competitive intelligence
- Educating employees and job applicants never to reveal or use any nonpublic proprietary information obtained during prior employment at another organization
- Ensuring that any third parties who collect competitive information for us also adhere to our legal and ethical standards

**Q:** Before joining the Company, I used to work for one of our competitors. Much of what I know about refrigerated containers, I learned there. How do I determine how much of that knowledge I can share in my new job here?

**A:** A good basic rule is to think of what could be considered confidential or proprietary information of your former employer and not use that information to perform your new job or disclose that information to us. If you know the details of a process, design, or formula that is not supposed to be public, for example, you should never share that information. If you have a question, contact an Ethics & Compliance Officer or the Legal Department.

We take responsibility for understanding and complying with all international trade compliance (ITC) laws and regulations that apply to us worldwide.

## WHY IT MATTERS

We are a company of nearly 60,000 employees operating in dozens of countries and supplying high-technology products and services to customers around the globe. This means we are subject to a diverse and complex set of laws and regulations governing international trade—including export controls, economic sanctions and embargoes, U.S. anti-boycott rules, and import controls. National governments and multinational organizations throughout the world use international trade compliance (ITC) laws to control the movement of goods, services, and technologies to safeguard national security, prevent proliferation of weapons of mass destruction, support foreign policy objectives, and protect the health, safety, and scarce resources of their citizens.

Failing to meet our ITC obligations can subject us to severe penalties and reputational damage. It can also lead to our products and technologies getting into the wrong hands. As a manufacturer and supplier of cutting-edge commercial systems, we have a duty to prevent this from happening.

## HOW WE MAKE IT POSSIBLE

Our Company is committed to conducting business everywhere in full compliance with applicable ITC laws, at all times. We are all accountable for ensuring compliance, and managers must also ensure their organizations comply. This means we:

- Identify and classify all our products, technologies, and services to determine how they are controlled
- Safeguard controlled commodities and technology, both physical and intangible, against unauthorized transfer or release
- Ensure appropriate government authorizations exist to allow the transfer of all items provided to suppliers, customers, business partners, and other third parties; screen all transactions for relevant sanctions and restricted party lists; confirm that the ultimate end-use, end-user, and destination are permitted; and oversee any authorization for the life cycle of the transaction
- Maintain accurate records and effective transfer, tracking, and reporting mechanisms
- Classify imported goods and value them correctly so that we make accurate and timely entries, pay the right import duties, and ensure proper country-of-origin declarations
- Do not agree to or engage in any boycott-related activities that are inconsistent with U.S. anti-boycott laws, and report boycott-related requests when required

# PREVENTING BRIBERY AND CORRUPTION

We pursue our business objectives solely on merits—never by bribery or other corrupt practices.

## WHY IT MATTERS

While our values of innovation and excellence distinguish *what* we do, our values of respect, integrity, and inclusion speak to *how* we do it. When it comes to winning business and selecting business partners, we rely on our values to dictate our actions. We will walk away from an opportunity—regardless of the partner, value, or location—rather than allow a business outcome to be improperly influenced.

As a leading global company whose products and services help to ensure comfort and safety all over the world, we have both the opportunity and responsibility to be a force for positive change. When we lead by example in the fight against corruption, we combat its destructive influence in communities and we help promote and protect open markets. Because we champion fair and transparent market practices everywhere we do business, customers can more easily recognize the superior quality and value of our products and services.

## HOW WE MAKE IT POSSIBLE

Our Company takes a stand against corruption and wins business the right way. This means that we:

- Win on the merit of our products, services, and terms of our offers
- Never offer anything of value to improperly influence a decision—whether dealing with a government official or someone in the private sector
- Record all transactions completely, accurately, and truthfully
- Follow the letter and spirit of anti-corruption laws everywhere we do business
- Choose business partners carefully and hold them to our high ethical standards

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## CORRUPTION RED FLAGS

When choosing business partners to assist our operations, we watch out for:

- Past allegations of improper payments
- Demands to receive commissions before a transaction is complete
- Demands for fees that are disproportionate to services provided or to be paid to another party or jurisdiction
- Suggestions that we work with specific people due to a “special relationship”
- Conflicts of interest that could improperly influence customers or officials
- Involvement of a new third party near to the award date
- Requests to record an expense dishonestly, or differently from what it is

**Q:** A city clerk is refusing to release a payment that's owed to the Company unless I make an extra payment in cash, which the clerk says will “speed things up.” The amount he's asking for is small enough that I might even pay it out of my own pocket, and then it doesn't have to go on the Company's books. What should I do?

**A:** However the clerk might try to characterize the payment, it is effectively a bribe. Our policies and core values prohibit payments that are or could be interpreted as bribes, even if they are customary in the country where we're doing business. And, the Company's books and records must accurately reflect our business transactions—improperly recording our transactions is a violation of law and policy. What you suggest would be not only misguided, but also illegal under the laws that apply to the Company for any employee or other person to make such a payment on the Company's behalf. Contact your local Ethics & Compliance Officer or the Legal Department immediately if you ever believe that you are being asked to pay a bribe.

**Q:** I'm an account manager who processes expenses. Recently I received a department manager's application for reimbursement of expenses. I've discovered the conference the manager cited as an expense was never actually held. What should I do?

**A:** It may have been a simple mistake, or it may have been deliberate. Intentionally inaccurate expenses create risk to us under anti-corruption laws. They also hurt our bottom line, which harms all of us. Do not process this expense. Take it to a manager or to Ethics & Compliance for further review and guidance.





## WE ARE RESPONSIBLE STEWARDS FOR OUR INVESTORS

We respect our shareholders and the trust they have put in us. We make unbiased decisions that emphasize long-term sustainable growth and a flawless focus on our commitments. We make our records and reporting accurate and transparent, value and protect our assets, and perform with integrity every day.

|   |    |
|---|----|
| Preventing Insider Trading and Misuse of Material Nonpublic Information | 33 |
| Avoiding Conflicts of Interest  | 34 |
| Creating, Maintaining, and Disclosing Accurate Records and Accounts     | 36 |
| Protecting Our Intellectual Property                                    | 38 |
| Respecting the Intellectual Property of Others                          | 40 |
| Safeguarding Company Property   | 41 |

# PREVENTING INSIDER TRADING AND MISUSE OF MATERIAL NONPUBLIC INFORMATION

We never use or share material, nonpublic information about Carrier or any other company for the purpose of buying or selling securities.

## WHY IT MATTERS

In the course of our jobs, we may have access to information that is not known to the public. We must protect such information, using it only as needed and never to inform personal investment decisions.

*Material, nonpublic ("inside") information* is information about any company that has not been made publicly available and that a reasonable investor would consider important when deciding to trade securities.

It can include:

- Financial results and dividends
- New contract awards
- Lawsuits, settlements, or pending litigation
- New products or marketing initiatives
- Changes in upper management
- Anticipated mergers or acquisitions

*Insider trading* occurs when an individual makes use of this inside information for personal gain or to avoid a loss in the stock market, or shares it so that others may do the same. Insider trading is a serious crime, punishable by heavy fines and even imprisonment.

## HOW WE MAKE IT POSSIBLE

We can help prevent insider trading and market abuse by:

- Never buying, selling or otherwise dealing with shares in Carrier or any other publicly traded company when in possession of inside information
- Not disclosing inside information to anyone outside Carrier, including family members, relatives, or friends
- Sharing inside information with fellow employees only on a need-to-know basis
- Not engaging in "tipping," which means directly or indirectly passing along material, nonpublic information about any company to anyone who may trade while aware of such information

**Report any misuse of inside information to a supervisor, Ethics & Compliance Officer, or the Legal Department, or use the Company's Anonymous Reporting Program.**

We are careful to not let our personal interests conflict with our commitment to the Company, and its goals and needs.

## WHY IT MATTERS

Our value of integrity demands that we not allow personal interests and relationships to get in the way of making the best decisions for the Company. Using good judgment to make the best choices for our business helps us meet our standards of performance and enables us to collaborate and innovate without distraction. It also honors our duty of loyalty to the Company.

Even an *apparent* conflict of interest can be a problem because it could lead others to think we are not acting properly. Conflicts of interest can be avoided or addressed if promptly disclosed and properly managed.

## HOW WE MAKE IT POSSIBLE

We avoid conflicts of interest (or the appearance of them) and, when unavoidable, ensure they can be properly managed by:

- Being alert to situations that could put the Company's interests and our own into possible conflict, and disclosing actual or potential conflicts to a manager or local Ethics & Compliance Officer
- Removing ourselves from the decision-making process when in an actual or potential conflict situation
- Not putting ourselves in situations where loyalty to our family members or close friends might improperly influence our judgment
- Recognizing when our personal financial considerations and connections to competitors, suppliers, or customers might compromise our ability to act in the best interest of the Company
- Showing loyalty to the Company by not keeping for ourselves opportunities gained through the use of Company position or resources
- Giving our best effort every day at the Company and not allowing outside jobs or other activities to hinder our contributions to our business
- Offering and accepting gifts and entertainment only if they:
  - Are appropriate
  - Serve a legitimate business purpose
  - Do not compromise our judgment

**All actual and potential conflicts must be disclosed for review. If you have a conflict of interest concern, get guidance from an Ethics & Compliance Officer.**

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## Conflicts of Interest Quick Test

If I take this course of action, will I:

- Feel obligated to someone or make them feel obligated to me?
- Dishonor our values?
- Risk compromising my judgment?
- Create the appearance of improper conduct or divided loyalty?
- Receive some personal gain or benefit for myself, a family member, or a close friend that is unusual or excessive in value or frequency?

If you answered “yes” to any of these questions, you likely face a possible conflict of interest. Seek guidance.

**Q:** I have a niece who just graduated with a degree in engineering. If we hired her, she would not report to me. Can I recommend her for a position?

**A:** Some of our best hires come from employee referrals. To avoid the appearance of anything improper, you must disclose your relationship to the hiring manager. You should not participate in the hiring process, so that your niece can be evaluated based solely on her merits.

# CREATING, MAINTAINING, AND DISCLOSING ACCURATE RECORDS AND ACCOUNTS

Our business reputation and effectiveness depend on records that are clear and precise while being preserved and disclosed according to accepted principles and strict policies.

## WHY IT MATTERS

Whether we are preparing the Company's annual report or filling out a timesheet, we are playing a role in upholding the Company's commitment to accurate record keeping and reporting. We understand the importance of this responsibility. We know the Company counts on records being correct, complete, and truthful in order to make sound business decisions. Likewise, our shareholders rely on accurate and transparent reporting for their investment decisions. By following accepted accounting principles, maintaining records properly, and making accurate reports, we meet our legal obligations and avoid reputational damage, fines, and civil or criminal penalties. We also make our business more efficient and more productive, while validating the trust our stakeholders have put in us.

## HOW WE MAKE IT POSSIBLE

We create, maintain, and dispose of records properly and with integrity. This means we:

- Record all assets, liabilities, revenues, expenses, and business transactions in an accurate and timely manner, according to regulations, generally accepted accounting principles, and Company policies
- Make sure budget proposals and economic evaluations fairly represent all relevant information
- Make no deliberately inaccurate or deceptive entry in our books and records
- Keep no secret or unrecorded cash funds or other assets
- Advise customers and suppliers of errors and promptly correct them through credits, refunds, or other accepted means
- Retain and dispose of records according to Company policies and legal requirements
- Protect any records that may relate to legal proceedings

**Any suspected records violations must be reported. You can contact a supervisor, Ethics & Compliance Officer, or the Legal Department, or use the Company Anonymous Reporting Program.**

CONTINUED >

# CREATING, MAINTAINING, AND DISCLOSING ACCURATE RECORDS AND ACCOUNTS (CONTINUED)

**Q:** Even though our records management policies allow us to dispose of some records after a certain amount of time, I've been keeping most of mine indefinitely—especially electronic records like emails—just to be safe. Is that okay?

**A:** The Company's records management policies don't "allow" disposal of records—they typically require disposal after a certain amount of time, depending on the type of record. By not disposing of records on time, you're not only violating Company policy, you could be overtaxing storage systems, creating inefficiency, and leaving us vulnerable to legal issues. However, there are certain documents that must be retained, such as those involved in possible or existing legal matters or subject to a formal legal hold. We each have a responsibility to know and follow the retention schedules for every record we encounter.

# PROTECTING OUR INTELLECTUAL PROPERTY

We protect our Company's intellectual property from misuse, misappropriation, destruction, and loss.

### WHY IT MATTERS

Through our core value of innovation, our Company has created one of the largest intellectual property portfolios in the world. These assets are the result of the hard work we each put in every day, and they form a platform for innovation and growth. Protecting them is crucial to our goal of delivering competitive excellence, and to the future of our business.

### HOW WE MAKE IT POSSIBLE

We protect our intellectual property by:

- Accessing, using, and disclosing the Company's intellectual property (such as trade secrets, inventions, technical data, designs, know-how, software, strategies, contract details, and financial information) only as required to perform our duties, and always in accordance with applicable Company policies and procedures
- Promptly disclosing to the Company all inventions created during employment with the Company, so that they may be evaluated in time for patenting
- Disclosing proprietary information to others—even within the Company—only if they have a need to know the information, and to a third party only after an appropriate nondisclosure or other agreement is in place
- Abiding by applicable Company policies and procedures for electronically transmitting proprietary information and for the use of social media
- Understanding and complying with any contractual or regulatory requirements in order for a third party receiving our proprietary information to be obligated to protect it
- Ensuring that agreements governing intellectual property ownership and license rights are in place before collaborating with third parties

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## **Intellectual Property**

Intellectual property includes, for example:

- Ideas and inventions
- Trademarks, trade names, and logos
- Works of authorship (such as illustrations, writings, drawings, documentation, and software)
- Proprietary information, both of a technical and business nature, including:
  - Technical data, designs, and know-how
  - Business, marketing, sales, procurement, and pricing plans
  - Business strategies
  - Merger and acquisition information
  - Contract details
  - Financial information

Our Company protects its intellectual property globally through a variety of legal means, including contracts, patents, trade secrets, registered and unregistered trademarks, copyrights, and design rights.



# RESPECTING THE INTELLECTUAL PROPERTY OF OTHERS

We take action to prevent the misuse, misappropriation, destruction, impairment, or loss of others' intellectual property.

## WHY IT MATTERS

Just as our Company values its own intellectual property rights and expects others to respect those rights, our Company values and respects the legitimate intellectual property rights of others. This includes all forms of intellectual property, whether entrusted to us by customers, business partners, or suppliers, or held by our competitors or other third parties. By safeguarding such rights, we not only comply with our legal obligations, we reinforce the trust and respect others hold for our Company.

## HOW WE MAKE IT POSSIBLE

We respect the intellectual property rights of others by:

- Following all policies and procedures relating to the protection of proprietary information and other intellectual property
- Not soliciting, accepting, using, or disclosing the proprietary information of our customers, business partners, competitors, or of other third parties, without authorization
- Not copying the work of others—including, for example, images, publications, videos, or other content found on the Internet—unless we have a license to do so
- Respecting others' patent rights, trade secrets, and proprietary information during our research and development processes
- Abiding by applicable intellectual property license agreements and other contractual terms governing the use or disclosure of the proprietary information of others
- Recognizing third-party copyrights, logos, trademarks, trade names, and designs in our marketing and other publications
- Reporting counterfeit products and other intellectual property crimes

# SAFEGUARDING COMPANY PROPERTY

We protect all Company property from harm, loss, and misuse.

## WHY IT MATTERS

Our Company's assets are created through the hard work we each put in every day. They are both a source and a reflection of our innovation and growth; they are crucial to our winning spirit on a daily basis. We respect and protect these assets as we would our own personal property. We safeguard them from mistreatment and misappropriation. We know the Company and our shareholders are counting on us to take personal responsibility for safeguarding our assets from misuse.

## HOW WE MAKE IT POSSIBLE

We are responsible stewards of Company property. This means we:

- Always handle our tangible assets properly and according to Company policy
- Prevent loss, waste, destruction, theft, and abuse of Company resources
- Use Company assets only for business purposes and never for personal gain
- Limit personal use of Company communications equipment and systems
- Report circumstances where we suspect Company assets are at risk
- Make sure all business transactions are authorized by management and subjected to internal review and approval processes
- Design and follow internal controls that help ensure accurate financial reporting and full compliance with audits, investigations, laws, and regulations
- Prevent financial assets from being used for money laundering or terrorist financing by remaining alert to warning signs and following international regulations

## Tangible Assets

Tangible assets are anything physical that the Company provides to employees to conduct business, such as facilities, vehicles, computers and other electronic devices, machinery, tools, cash, office supplies, and ID cards.

## Financial Assets

Financial assets are the Company's money, financial instruments, or anything that can be converted into money.

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## **Warning Signs of Money Laundering**

Possible red flags for money laundering include, but are not limited, to:

- Customers making payments through multiple accounts
- Payments made on a customer's behalf by a third party with no justification or explanation
- Requests for payments to be made to personal or offshore accounts rather than usual company accounts
- Requests for payments to be made at odd times or in unusual amounts
- Requests for numerous payments that are all below \$10,000

**Report any misuse of Company assets to a supervisor, Ethics & Compliance Officer, or the Legal Department, or use the Company Anonymous Reporting Program.**



## WE BUILD ENDURING PARTNERSHIPS

We seek out business partners who share our unyielding commitment to performance and our commitment to meet or exceed our customers' needs. We treat our partners with respect and integrity and cultivate an environment of inclusion, protecting their rights while also holding them to high ethical standards as part of a world-class supply chain.

Selecting the Right Partners

44

Respecting and Protecting Human Rights

45

# SELECTING THE RIGHT PARTNERS

We choose our business partners based on merit and shared values, and we treat them fairly.

## WHY IT MATTERS

We seek out business partners who can help us achieve our business goals by providing expertise, resources, efficiency, and innovation to help us deliver reliable products on schedule. We also seek partners who share our high ethical standards and our passion for making the world a better place.

## HOW WE MAKE IT POSSIBLE

We select our business partners through a competitive but fair process. This means we:

- Look for partners who meet our standards of safety, integrity, and performance while delivering what they promise, on time and on budget
- Conduct due diligence to ensure potential key business partners are qualified and reputable before we bring them onboard, and monitor their performance afterward
- Set up clear, specific performance requirements with measurable results
- Formalize relationships in writing so all transactions are transparent and properly recorded and business partners are accountable to perform in accordance with our safety, ethics, and compliance requirements
- Seek opportunities for small, disadvantaged, minority-owned, woman-owned, veteran-owned, historically underutilized businesses

# RESPECTING AND PROTECTING HUMAN RIGHTS

We are committed to good citizenship and engaging with others to promote better working conditions for all.

## WHY IT MATTERS

Our vast global footprint enables us to make our mark in the fight for safer working conditions and equal opportunity around the world. Our Company takes robust and thorough measures to protect workers at our own facilities. But we can also promote positive change by encouraging our business partners and communities to respect human rights as well. Therefore, we honor our core values by engaging with those who share our commitment to helping keep people safe, comfortable, productive, and on the move.

## HOW WE MAKE IT POSSIBLE

Our Company respects and protects human rights by:

- Ensuring safe and healthy working conditions for its employees, based on whatever is most stringent: U.S. standards, local standards, or Company policies
- Never using child labor or forced labor, and always seeking out business partners who share our commitment to fighting human or sex trafficking and supporting human rights
- Prohibiting discrimination based on any unlawful basis, including: race, color, religion, national origin, gender, age, disability, veteran status, marital status, citizenship status, creed, sexual orientation, and other protected categories as provided by applicable law
- Delivering compensation and benefits to attract and retain strong talent for our businesses, while complying with all applicable regulations pertaining to wages, hours, and legally mandated benefits
- Recognizing the principle of freedom of association and the right to collective bargaining as they exist under applicable laws in the countries where we operate
- Promoting responsible sourcing practices and setting expectations for our key suppliers through the Supplier Code of Ethics, including that suppliers must ensure safe and healthy work environments for their employees, avoid discrimination, ensure that child labor is not used, and avoid human trafficking

To ensure robust reporting of allegations of wrongdoing, Carrier provides safe and confidential channels for employees and third parties to seek guidance, ask questions, make comments, and report suspected misconduct. The Company's Anonymous Reporting Program allows employees and others to ask a question or raise concerns.



## WE ARE ENGAGED IN OUR COMMUNITIES

Our products help make modern life possible. They also make things better—and that's a mission we each take into our communities as well. We protect the environment we share and seek out sustainable ways to create value. We also support vibrant volunteer opportunities, social improvement efforts, and charitable causes, understanding that when our communities get stronger, we get stronger too.

Protecting the Environment

47

Contributing to  
Our Communities

48

Participating in the  
Political Process

49

We respect all environmental laws and regulations that apply to us, while also pursuing ambitious goals for conservation and sustainability.

### WHY IT MATTERS

Our global operations—and especially the use of many of our products in large cities—have shown us the increasing pressures our environment is facing from population growth and urbanization. They've also given us the opportunity to set a powerful example. That's why we are not content to simply meet our legal obligations when it comes to environmental standards. We want to be a catalyst of positive change, making progress through innovation and showing our peers and our communities that reducing your environmental footprint is not only good for the world, it's good for business.

### HOW WE MAKE IT POSSIBLE

Our Company promotes environmental responsibility and sustainability. This means we:

- Follow all applicable environmental laws, stay current on permits, report any incidents, and safely dispose of hazardous waste
- Seek out opportunities to conserve energy, water, and materials
- Work to design and manufacture products that reinforce our commitment to conservation
- Create building systems that reduce emissions and promote sustainability
- Expect our key suppliers to increasingly employ sustainable practices
- Set goals that motivate us and our key suppliers to seek out constant improvement in conservation and sustainability
- Make personal efforts to find new ways we can conserve as individuals

**If you have concerns about an environmental issue, contact a supervisor, Environmental Health & Safety (EH&S) professional, or Ethics & Compliance Officer, or use the Company Anonymous Reporting Program.**



# CONTRIBUTING TO OUR COMMUNITIES

We are active partners in our communities, volunteering our time, resources, and talents to help them prosper.

## WHY IT MATTERS

Our Company operates on a global scale. But we also draw strength and inspiration from our local communities—the places where we work and live. We seek to encourage growth and vitality through positive engagement with our neighbors, increasing mutual respect and trust, and enhancing our reputation and recruiting efforts in the process.

## HOW WE MAKE IT POSSIBLE

Our Company is a responsible corporate citizen of the communities where we operate. This means we:

- Encourage and celebrate the active roles our employees take in our communities as volunteers, mentors, and charity workers
- Engage in worthwhile civic and charitable causes, vetting them beforehand to ensure they are legitimate
- Never seek anything in return for charitable contribution

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

**A:** Although the Company also supports your charity, you should not attend any such event as an official Company representative without prior authorization to do so. Contact your management beforehand for authorization, and perhaps you can even get the Company to officially support the event.

# PARTICIPATING IN THE POLITICAL PROCESS

We comply with all national, state, and local laws governing corporate participation in political affairs, and we encourage employees to get involved in the political process as private citizens.

## WHY IT MATTERS

As a company, we work closely with governments worldwide and have a stake in political outcomes. We participate as a company in the political process but we do so responsibly. We understand and respect the legal limitations on corporations, and follow the rules in letter and spirit. At the same time, we fully support our employees in fulfilling their civic duty by staying informed and contributing their time or financial support to political activities.

## HOW WE MAKE IT POSSIBLE

We engage in politics legally and ethically, as a business and as individuals. This means we:

- Comply with all legal limitations on corporate contributions to parties, political committees, and individual candidates
- Make it clear when engaging in politics as private citizens that our views and actions are our own, not the Company's
- Inform the Ethics & Compliance Office if we run for office as individuals, to help avoid potential conflicts of interest
- Are aware of lobbying rules and avoid contacting public officials without express authorization and understanding of public disclosure and reporting requirements
- Do not make political contributions on behalf of the Company or use Company funds unless it is permitted by law and we have received advance approval from the Legal Department

## Disclaimer

The Code of Ethics does not confer any contractual right, either express or implied, to remain employed by the Company. Nor does it guarantee any fixed terms and conditions of your employment.