



SECTION 5:

Antitrust Compliance Program

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A. SUMMARY

Each employee of Carrier, no matter what position he or she holds, is responsible to ensure Carrier's compliance with applicable antitrust laws (known in some countries as competition laws). These laws are designed to promote competition and protect consumers from unfair business arrangements and practices. Violations of antitrust laws can result in severe penalties and significant damage to the company's reputation, including large fines and the loss of important contract, patent and license rights for Carrier as well as fines and jail sentences for individual employees. In addition to government suits, private parties can sue, and damage awards can be massive, as can the legal fees incurred to defend the suits.

B. POLICY

Every employee must learn and comply with Carrier antitrust policies and procedures to ensure strict compliance with all applicable antitrust laws. The antitrust laws are complex and their application to a business or a transaction depends on a variety of factors. As issues arise, you should review this policy and consult the Carrier Legal Department.

Carrier will periodically conduct antitrust educational programs (including programs offered electronically through the internet) as well as antitrust compliance reviews to ensure that its officers and employees conduct Carrier's business in a lawful manner. This training is particularly important where employees' duties bring them into contact with competitors or involve pricing, pricing policies, terms of sale or other marketing responsibilities.

Activities outside of the United States may be subject to the antitrust laws of the United States and other countries. Accordingly, those entities doing business outside the United States must comply with all applicable antitrust laws, whether local laws, United States laws, or those laws of other countries that are affected by the business conduct at issue.

C. DEFINITIONS

All capitalized terms not defined in this policy are defined in [CPM 1: Governance and Definitions](#) including [Exhibit 1: Compliance Glossary](#)

E. REFERENCES

All referenced CPM and CPSW can be retrieved from [ePolicy](#)

CPSW-5A: Antitrust Compliance Program

CPSW-5B: Trade Associations and Trade Shows