United Technologies Corporation (UTC) is committed to maintaining high standards of corporate responsibility and takes seriously reports that the violent conflict in the Democratic Republic of Congo (DRC) region is partially financed by the exploitation and trade of “conflict minerals” – tantalum, tin, tungsten and gold (a/k/a “3TG”) – originating in the DRC region. Accordingly, UTC supports the underlying objective of legislation enacted to curb the illicit trade of 3TG. UTC is engaged in efforts to reduce the risk that minerals used in its products may contribute to the violence in the DRC region, including sponsorship of initiatives aimed at ridding global supply chains of 3TG that help finance violence.

Overview of the Conflict Minerals Legislation

Seeking to sever the link between 3TG and human rights abuses in the DRC region, Congress enacted in 2010 section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act (Dodd-Frank Act), which calls for companies to disclose their use of 3TG. Congress directed the Securities and Exchange Commission (SEC) to create specialized disclosure rules implementing the legislation. The SEC adopted final rules requiring publicly listed companies, including UTC, to disclose information annually about the use of 3TG in their products.

Minerals in UTC’s Supply Chain

3TG make their way into the supply chain of various products used by consumers and businesses around the world. As a downstream user that manufactures products that could contain 3TG, UTC and its business segments have undertaken a disciplined process to reduce the risk of manufacturing products that may contain minerals that contribute to the violence in the DRC region. We prefer to source 3TG originating in the DRC region from a smelter or refiner validated as conflict-free by an independent third-party, such as for example, through the Responsible Minerals Initiative Responsible Minerals Assurance Process, or similar third-party programs. We will continue to support initiatives that enable the sourcing of conflict-free minerals.

UTC’s Compliance Efforts

UTC is committed to complying with the conflict minerals rule and has established a conflict minerals compliance program that is designed to conform, in all material respects, to the internationally recognized due diligence framework established by the Organisation for Economic Cooperation and Development (OECD). The annual Form SD disclosure report UTC files with the Securities Exchange Commission (SEC) describes the due diligence measures UTC and its business segments undertook during the reporting period. The most recently filed Form SD report is published on UTC’s website at http://www.utc.com/Suppliers/Pages/Default.aspx (adjacent to this policy statement). UTC’s previously filed Form SD reports are available through the Investor Relations section of our website (http://www.utc.com) under the heading “SEC
Because UTC does not source 3TG directly from smelters or refiners and has a multi-tiered, complex and geographically dispersed supply chain, engagement with our suppliers is a fundamental element of our efforts to comply with the legislation. UTC requires its suppliers to comply with the conflict minerals rule and to support UTC in fulfilling its obligations under the rule, including providing UTC with information regarding the country of origin of the 3TG in components supplied to UTC’s business segments. When non-compliance is detected, we will attempt to work with the supplier concerned to correct the situation. If a supplier remains noncompliant, we will evaluate our options, including but not limited to reassessment of the supplier relationship.

Likewise, as a supplier, UTC is committed to assisting our customers’ efforts to meet their legal obligations under the conflict minerals rule. The conflict minerals compliance program UTC implemented helps us provide appropriate information to support our customers in complying with the conflict minerals rule.

Questions or Concerns

Please direct general questions regarding UTC’s conflict minerals program to UTC’s Corporate Responsibility Manager at cminfo@utc.com. To report concerns about this policy or a potential violation, please contact the UTC Headquarters Business Practices Office by e-mail at bpo@corphq.utc.com. Alternatively, for an “off-the-record” confidential discussion regarding an issue or concern, or to identify reporting options, contact a UTC Ombudsman by telephone at 800.871.9065, or submit a written inquiry using UTC’s secure, encrypted, web-enabled system eDIALOG.confidential (https://edialog.confidential.utc.com/). Additional information regarding the Ombudsman/ DIALOG Program is available at www.utc.com/Governance.

UTC’s policy statement on conflict minerals will be regularly reviewed and updated as necessary.