

Equal Employment/Affirmative Action

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Code of Ethics

A. SUMMARY

United Technologies Corporation (the Corporation) has implemented the following policies and procedures as part of its longstanding commitment to compliance with all applicable U.S. Equal Opportunity and Affirmative Action requirements.

Equal Employment Opportunity (EEO)

The Corporation is committed to maintaining a work environment that is free from any and all forms of unlawful discrimination. It is the Corporation's policy to treat any applicant, employee, vendor, contractor, customer, or client without regard to race, religion, color, gender identity or expression, sex, sexual orientation, sex stereotyping, national origin, ancestry, marital status, military or veteran status, physical or mental disability, pregnancy, protected medical condition, genetic information, citizenship status, or any other basis prohibited by law, whether in recruitment, employment, promotion, transfer, compensation, or other conditions of employment.

Affirmative Action (AA)

The Corporation is a U.S. federal contractor subject to Executive Order 11246, Section 4212 of the Vietnam Era Veterans' Readjustment Assistance Act of 1974, as amended ("Section 4212") and Section 503 of the Rehabilitation Act of 1973, as amended ("Section 503"). As such, the Corporation is committed to taking positive steps to implement the employment-related aspects of its EEO policy. It is the Corporation's policy to take affirmative action to employ, advance in employment, and otherwise treat qualified minorities, women, protected veterans, and individuals with disabilities without regard to their race/ethnicity, sex, sexual orientation, gender identity or expression, veteran status, or physical or mental disability. Under this policy, the Corporation also will provide reasonable accommodation to the known physical or mental limitations of an otherwise qualified employee or applicant for employment, unless the accommodation would impose undue hardship on the operation of the company's business.

The company's EEO and AA policy also prohibits employees and applicants from being subjected to harassment, intimidation, threats, coercion, or discrimination because they have engaged in or may engage in (1) filing a complaint; (2) assisting or participating in an investigation, compliance review, hearing, or any other activity related to the administration of Section 503, Section 4212, or any other Federal, state or local law requiring equal opportunity for disabled persons or covered veterans; (3) opposing any act or practice made unlawful by Section 503 or Section 4212 and their implementing regulations, or any other Federal, state or local law requiring equal opportunity for disabled persons or covered veterans; or (4) exercising any other right protected by Section 503 or Section 4212 or their implementing regulations.

The non-confidential portions of the affirmative action program for individuals with disabilities and protected veterans shall be available for inspection upon request by any employee or applicant for employment by notifying their local Human Resources representative.



B. APPLICABILITY

This Policy applies to the Corporation, including its subsidiaries, divisions and other business entities controlled by the Corporation.

C. POLICY

The Corporation will abide by the national and local laws of the countries in which it operates and the laws of the United States as they may apply to business outside the United States. Those entities of the Corporation doing business outside the United States may conform to local requirements and practices in lieu of the procedural requirements of Section D of this Policy.

1. In carrying out this policy, the Corporation will ensure that employment decisions are based only on valid job requirements, and extend to all terms, conditions, and privileges of employment, including, but not limited to, recruitment, selection, compensation, benefits, promotion, transfer, layoff, recall from layoff, employee development, company sponsored (both company operated and company supported) training and educational assistance programs, social and recreational programs and disciplinary actions. Periodic analyses of all personnel actions are conducted to ensure Equal Employment/Affirmative Action.
2. The Chairman and Chief Executive Officer fully supports the Corporation's affirmative action programs and is committed to the implementation of the Corporation's EO and AA policies. The Executive Vice President and Chief Human Resources Officer, is responsible for establishing and carrying out the procedures and practices formulated for the purpose of implementing this Policy.
3. Responsibility for implementing this Policy within each line organization is assigned to the senior manager at each location.
4. Any supervisor responsible for hiring, terminating, or any other personnel activity regarding current staff members or applicants must comply with this Policy and its implementing procedures.

D. PROCEDURES FOR EEO/AA COMPLIANCE

The procedures to guide managers, supervisors and Human Resources to meet their obligations under U.S. law are outlined in Exhibit 3.

E. REFERENCES

See [Exhibit 1](#) - Reaffirmation Statement of the Chairman and Chief Executive Officer
See [Exhibit 2](#) - regarding the Corporation's agreement and warranty related to performance of contracts with the State of Connecticut and its political subdivisions.
See [Exhibit 3](#) - Procedures for Implementing EEO/AA Programs

F. REVIEW

This Policy shall be reviewed annually by the Chairman and Chief Executive Officer.

EXHIBIT 1

Reaffirmation of Equal Employment Opportunity Policy

It is the policy of United Technologies Corporation to ensure equal opportunity and treatment in recruitment, compensation, terms, conditions, and privileges of employment to all qualified persons without regard to race, religion, color, gender identity or expression, sex, sexual orientation, sex stereotyping, national origin, ancestry, marital status, military or veteran status, physical or mental disability, pregnancy¹, protected medical condition, genetic information, citizenship status, or any other basis prohibited by law.

In carrying out this policy, the Corporation will ensure:

- A. Employment decisions are based on the principle of Equal Employment Opportunity. Recruitment and hiring decisions are based on valid requirements for such opportunities.
- B. Promotion decisions are based on the principle of Equal Employment Opportunity and valid job requirements.
- C. Personnel decisions, such as those pertaining to compensation, benefit programs, transfers, layoffs, recall from layoff, Company sponsored (both Company operating and Company supported) training and educational assistance programs, and social and recreational programs are administered in accordance with the principle of Equal Employment Opportunity.
- D. Analyses of personnel transactions are conducted to ensure equal opportunity.
- E. Every effort is made to maintain a positive, productive work environment that is respectful of individual differences and is free of all forms of harassment, including sexual harassment.
- F. Reasonable accommodations are made for the physical and mental limitation of employees and applicants who are otherwise qualified to perform the essential functions of a job unless such an accommodation would impose an undue business hardship. Reasonable accommodations are similarly made for the religious observances and practices of applicants and employees.

The employment and placement of persons with disabilities and protected veterans is an essential part of corporate responsibility. Employers must encourage and enable persons with disabilities and protected veterans to contribute to society through work in a manner consistent with their individual ability and desire. In implementing this policy, officers, managers and supervisors shall undertake affirmative action to seek, employ, advance in employment and otherwise treat qualified persons with disabilities and protected veterans without discrimination based on their physical or mental limitations, special disability or veteran status in all employment practices, including upgrading, demotion, transfer, recruitment, recruitment advertising, layoff, termination, rates of pay or other forms of compensation, and selection for advancement.

¹ Including childbirth, breastfeeding and medical conditions related to pregnancy, childbirth or breastfeeding.



The Chairman and Chief Executive Officer fully supports the Corporation's affirmative action programs and is committed to the implementation of the Corporation's equal opportunity and affirmative action policies. Responsibility for accomplishing the objectives of the Equal Employment Opportunity Policy for the Corporate Headquarters is assigned to the Executive Vice President and Chief Human Resources Officer. The implementation of the Company's Affirmative Action Program is assigned to the Vice President, Employment Law and Global HR Compliance, who is also the EEO Program Manager. In this capacity, he/she will monitor the effectiveness of the Program.

Supervisors are made aware of their responsibility for implementing the Company's Equal Employment Opportunity Policy and are reminded that, as is the case with all other Company policies, their effectiveness in carrying out its objectives is among the criteria considered in evaluating their job performance.

Gregory J. Hayes

Chairman and Chief Executive Officer



EXHIBIT 2

NONDISCRIMINATION AGREEMENT AND WARRANTY UNDER CONNECTICUT GENERAL STATUTES, SECTIONS 4a-60(a)(1) and 4a-60a(a)(1)

In the performance of any contracts awarded by the State of Connecticut or any political subdivision other than a municipality, UTC and its operating companies agree and warrant that in the performance of the contract, they will not discriminate or permit discrimination against any person or group of persons on the grounds of race, color, religious creed, age, marital status, national origin, ancestry, sex, mental retardation, mental disability or physical disability, including, but not limited to, blindness, unless it is shown that such disability prevents performance of the work involved, in any manner prohibited by the laws of the United States or of the state of Connecticut. UTC and its operating companies further agree to take affirmative action to insure that applicants with job related qualifications are employed and that employees are treated when employed without regard to their race, color, religious creed, age, marital status, national origin, ancestry, sex, mental retardation, mental disability or physical disability, including, but not limited to, blindness, unless it is shown by such contractor that such disability prevents performance of the work involved.

UTC and its operating companies further agree and warrant that in the performance of the contract awarded by the State of Connecticut or any political subdivision other than a municipality, they will not discriminate or permit discrimination against any person or group of persons on the grounds of sexual orientation, in any manner prohibited by the laws of the United States or of the state of Connecticut, and that employees are treated when employed without regard to their sexual orientation.

EXHIBIT 3

Equal Employment/Affirmative Action

PROCEDURES FOR IMPLEMENTING EEO/AA PROGRAMS

General Procedures

- a) Objectives Established under an Affirmative Action Plan (AAP): Each year, objectives will be established with respect to females, minorities, individuals with disabilities, and protected veterans. Supervisors should have knowledge of these objectives and consider them when hiring, recruiting, promoting, and selecting personnel for layoff. The Company has nearly 200 AAPs which cover the U.S. domestic workforce.

AAPs consist of goals for hiring based on U.S. census availability, and document the efforts made in the plan year to identify and acquire talent to meet these goals. The effectiveness of these AAPs is reviewed annually by the Company and is subject to audit by the U.S. Department of Labor, Office of Federal Contracts Compliance Programs.

- b) Maintaining an Applicant Log: Management is responsible for maintaining a log of all job applicants. The log will include: applicant name, race code, gender code, veteran status (if provided), disability status (if provided), job position/classification and disposition (i.e., if offer was made and if offer was accepted or rejected). The logs will be maintained for the required time period to record activity for both internal and external applicants. For further information, contact your local Human Resources representative.
- c) Individuals with Disabilities and Protected Veterans: With respect to individuals with disabilities and protected veterans, reasonable accommodation will be made to the physical and mental limitations of qualified employees or applicants. Within the constraints imposed by business necessity and reasonable financial costs, reasonable effort will be made to modify, as necessary, the non-essential job functions of the positions in order to accommodate the disabilities or limitations of an individual with a disability or a protected veteran. Only in situations where it can be demonstrated that such accommodation would impose undue hardship on the conduct of the Corporation's business may such efforts be limited. If you have any questions about the reasonableness of any accommodation, contact your local Human Resources representative.