

Harassment-Free Workplace

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A. SUMMARY

The Corporation will provide a working environment free of harassment based on 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.

B. APPLICABILITY

This Policy applies to United Technologies Corporation, including its subsidiaries, divisions and any other business entities controlled by the Corporation worldwide. This Policy extends to third parties, including but not limited to vendors, customers, and visitors.

C. POLICY

Employees of United Technologies Corporation deserve a workplace where they can achieve their full potential. For purposes of this policy, harassment is defined as unwelcome conduct when that conduct interferes with an employee's job performance. It can be spoken or written, graphic or physical. It can be done to offend, or simply as insensitive joking. Simply stated, harassment, of any kind, has no place in the Company's environment and will not be tolerated.

Sexual harassment deserves special mention. It is plainly wrong and unlawful for a supervisor or anyone else in authority to base an employment decision such as hiring, firing, demotion, transfer, or promotion on submission to or rejection of unwelcome sexual advances or requests for sexual favors. Such conduct is sexual harassment in its most direct form and is prohibited by law and Company policy. Sexual harassment can also occur through unwelcome sexual conduct that unreasonably interferes with an individual's job performance or creates an intimidating, hostile, or offensive working environment.

Sexual harassment may include explicit sexual propositions, sexual innuendo, suggestive comments, sexual kidding or teasing, practical jokes, jokes about gender-specific traits, foul or obscene language or gestures, display of foul or obscene printed or visual material, and physical contact such as patting, pinching, or brushing against another's body. Complaint or not, each of us must be sensitive to the way in which our words and actions are perceived by others. If they could reasonably be perceived as offensive and unwelcome, they can be unlawful harassment.

Each of us must help keep the workplace free of personal harassment. If you are being harassed, tell the harasser to stop; tell the harasser that his or her advances, comments or gestures are unwelcome and offensive. If you have witnessed or been the victim of harassment, you should immediately notify the Company by contacting a Human Resources representative.

If you do not want to notify the Company initially by contacting Human Resources and you need advice, contact your [unit Ombudsperson, corporate Ombuds](#) or the "[DIALOG](#)" [program](#). These organizations can assist you in your decision regarding notifying the Company. However, discussions through the Ombuds or DIALOG program are not legally recognized as notification of harassment to the Company.

United Technologies forbids retaliation against anyone who reports harassment or cooperates in an investigation of harassment.

It is the Company's policy to investigate each harassment complaint thoroughly and promptly. To the extent practicable, any complaint and the terms of its resolution will be kept confidential. If an investigation confirms that harassment has occurred, the Company will take disciplinary action, which may include termination of employment.

Finally, note that no policy can ever fully enumerate what actions or procedure to utilize if you observe harassment or receive a complaint alleging harassment. Some complaints or incidents, because of their unique facts or circumstances, may require a different approach. Common sense and traditional supervisory/managerial practices should provide the starting point for implementing this policy.

D. PROCEDURES FOR REPORTING HARASSMENT

If you believe you are being harassed, or have witnessed some form of harassment, see [Exhibit 1](#) for procedures that can guide you in reporting the issue to the Company.

E. REVIEW

This policy shall be reviewed at two-year intervals following its issuance.

EXHIBIT 1

Harassment-Free Workplace

PROCEDURES FOR REPORTING HARASSMENT

If you believe that you are being harassed by a Company employee, vendor, consultant or contractor, or if you observe harassment as defined in the Harassment-Free Workplace Policy 31, you must immediately notify the Company by informing a Human Resources representative.

If you do not want to notify the Company through Human Resources initially and you need advice, [contact your unit Ombuds, corporate Ombuds](#) or the ["DIALOG" program](#). These organizations can assist you in your decision regarding notifying the Company. However, discussions through the Ombuds or DIALOG program are not legally recognized as notification of harassment to the Company. Remember, if you have an issue that needs to be addressed, the Company is here to ensure you are protected.

If you are a manager or a supervisor and you observe harassment, or if you receive a complaint of harassment from a person working within the Company or participating in a Company sponsored event, contact your Human Resources representative immediately for guidance and assistance.

In the event of an incident, the following general guidelines may be helpful:

- Take the incident or complaint seriously. To the extent practical: determine the facts, circumstances, and parties involved in the complaint or incident; remain impartial and do not make assumptions about any party.
- You are not expected to conduct an investigation on your own; rather you should only gather basic facts and then seek guidance from Human Resources.
- Safeguard the rights of all parties involved and show due regard for confidentiality.
- If it is determined that further investigation, either formal or informal, is required, it is the responsibility of Human Resources to direct and/or conduct such investigation. The investigation may include, but is not limited to, interviewing the complaining party, the alleged harasser, supervisors and any other personnel, as required, to obtain sufficient, factual information upon which to make a determination.
- When the investigative process is concluded, Human Resources will report the findings, along with recommendation(s) for action, to the appropriate management.

The complaining party and, if appropriate, his/her supervisor or manager will be advised by Human Resources as to the final disposition of the complaint. Specific details may be withheld to safeguard confidentiality or the rights of individuals.