

## **Retaining Records & Data**

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[Code of Ethics](#)

**A. SUMMARY**

The Corporation will retain records and data as needed to satisfy business needs and applicable laws and regulations.

**B. APPLICABILITY**

This Policy applies to the Corporation and the subsidiaries, divisions and other business entities controlled by it worldwide

**C. POLICY**

1. Retaining necessary records and data is a routine part of business, enabling the Corporation to conduct its business effectively and to respond accurately and in a timely manner to internal and external customer demands. However, retaining unnecessary records and data in any form complicates and delays the retrieval of important information and wastes limited resources such as storage capacity and filing space.
2. Operating units and UTC Corporate Headquarters departments will ensure that records and data are retained, reviewed, stored and disposed of systematically, as necessary to satisfy business needs and the requirements of applicable laws and regulations.

**D. PROCEDURES**

Operating units and UTC Corporate Headquarters departments shall implement procedures meeting the requirements of [Exhibit 1](#). UTC Internal Audit will audit compliance with these procedures during its normal audit process.

**E. REFERENCES**

Additional guidance is contained in:

- [Section 14 – Data Protection](#)
- [Section 23 - Environment, Health and Safety Management System](#)
- [Section 37 - Electronic Communication Systems](#)
- [ITC Requirements Manual Section 5.1 – Recordkeeping and Logging Requirements](#)

## EXHIBIT 1

1. United Technologies Corporation, Corporate Headquarters departments, and subsidiaries and divisions ("the Corporation") will ensure that records and data are retained, reviewed, stored and disposed of systematically and in the regular course of business, after considering business needs and the requirements of applicable laws and regulations.
2. "Records and data" means:
  - a) Written, recorded, or graphical material of any kind in the possession or control of the Corporation, its subsidiaries and divisions, or their directors, officers or employees in the course of their duties;
  - b) The term includes data in any medium, such as paper, recordings or electronic files (whether stored on a network server, individual computer hard disk or separate disk from which information can be obtained by any means).
3. The Corporation will adopt procedures addressing the following minimum requirements:
  - a) Appointing a records and data custodian who has overall responsibility for administering this Policy. Additional custodians may be appointed when needed to respond to document requests involving litigation or investigations;
  - b) Creating and maintaining an index of types of records and data that are in the possession or control of the Corporation. This index will describe generally the types of records and data to be retained. Records and data will be assigned proper periods for retention, determined in accordance with the laws, regulations and treaties applicable to the locations where the Corporation is operating<sup>1</sup>;
  - c) Destroying records and data in the regular course of business and in accordance with the requirements of applicable laws and regulations. Destruction of records reasonably related to a matter will be stopped if the company knows or has a reasonable basis to believe that litigation, a government investigation, or audit is pending or imminent.
  - d) Random and scheduled reviews to assure that records and data are being disposed of in accordance with the requirements of this Policy. UTC Internal Audit will review retention procedures and practices as part of its normal audit process; and
  - e) Providing periodic training to employees in the requirements of this Policy. Training may be provided via dissemination of written policies or procedures, computer-based courses, or any combination of training methods used by the Corporation.
4. Questions on implementing or interpreting this Policy should be directed to the Legal Department.

<sup>1</sup> The UTC Legal Department periodically will publish a list of types of records and data and their pertinent retention periods as guidance for operating units and Corporate Headquarters departments. Additional sources of information include the *Guide to Record Retention Requirements* published annually in the [Code of Federal Regulations](#).