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POLICIES & STANDARD WORK INSTRUCTIONS

Trade Associations

1. PREAMBLE

Trade and professional associations and trade shows connected with our businesses' industries often perform useful, legitimate and pro-competitive functions. Because competitors may also be present at trade shows and Association (as defined below) meetings, as well as other functions, it is important to ensure that proper and lawful activities are not given the appearance of antitrust violations. Many companies have found themselves in antitrust difficulty because of a poor choice of words used to describe perfectly legitimate transactions or because a meeting was poorly structured or supervised and therefore invited antitrust scrutiny. The failure to give adequate consideration to the antitrust aspects of Association and trade show participation has often resulted in costly and embarrassing investigations or lawsuits that could have been avoided.

2. POLICY

This policy establishes review and approval requirements and conditions for membership and participation in Associations and for attendance at trade shows or other events at which CCS and one or more of its competitors are present.

3. APPLICABILITY

This policy applies to the UTC Climate, Controls & Security ("CCS") reporting entity and any and all worldwide business units, divisions and entities for which it has operational responsibility so long as they are controlled by United Technologies Corporation and/or its controlled affiliates. For WHQ employees, references to "Business Unit President" and "Reporting Unit President" shall be replaced with "Responsible Vice President" and references to "Business Unit Counsel" shall be replaced with "General Counsel CCS or the Deputy General Counsel, CCS".

4. OWNERSHIP AND APPROVAL

CCS' Vice President, General Counsel is the owner of this policy, with input from the Vice President, Sustainability, Marketing & Communications. All waivers and changes require prior approval of the owner. Contact the CCS Legal Department for all questions regarding this policy.

5. DEFINITIONS

Business Unit - The largest type of internal operating or profit and loss organization within CCS, led by a senior executive reporting directly to the CCS President (i.e., Americas, Asia, EMEA and Transcold).

Business Unit Counsel - The lead attorney in the Business Unit, reporting directly to the President of the Business Unit and reporting functionally to the CCS Vice President, General Counsel.

Reporting Unit - A CCS business or operating entity reporting directly or indirectly to a Business Unit or CCS World Headquarters ("WHQ") (e.g., Automated Logic Corporation, Carrier Transcold Europe, Supra, Guardfire).

Reporting Unit Counsel - The attorney or attorneys within the CCS Legal Department assigned responsibility to support a Reporting Unit, generally reporting directly or functionally to a BU Counsel.

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Non-Competitor Participants – For purposes of this policy shall mean individuals attending an Association meeting, convention or other event who are (i) actual or potential customers (who are not also competitors); (ii) government representatives (who are present primarily in a regulatory, compliance or enforcement capacity); or (iii) a lawyer approved by CCS in-house counsel (which may include in-house counsel, outside counsel or the Association’s counsel).

Trade Association - A group of people associated within CCS' industries that interact on a periodic, recurring basis and in which CCS and one or more of CCS' competitors are involved ("Association"). Associations are generally (i) related to any of CCS' industries and attended by employees of CCS and its competitors; or (ii) involved in the development of codes or standards associated with CCS' industries. Examples of organizations or groups that are considered Trade Associations for the purposes of this policy are international, national and local trade or industry groups and standard setting organizations. Examples of professional associations not deemed Associations for the purposes of this policy are the American Institute of Certified Public Accountants and the National Association of Engineers. Examples of professional associations deemed Associations for the purposes of this policy are the American Society of Heating, Refrigeration and Air Conditioning Engineers (ASHRAE) and the American Society of Gas Engineers (ASGE).

Consult the Legal Department in the event of any uncertainty with respect to whether a particular organization or event is covered by this policy.

Trade Show - A meeting or event associated within CCS' industries at which CCS and one or more of its competitors are present but which recurs no more often than once a year and for which membership in an Association is not required in order to participate.

6. METHOD OF APPLICATION / STANDARD WORK INSTRUCTIONS

6.1. Approval Process: New Association Membership

6.1.1. A CCS employee, Reporting Unit or Business Unit that wishes to join an Association that has not previously been approved in accordance with this policy or its predecessors¹ is required to submit a request for approval, in the form attached as Exhibit A, to the Business Unit Counsel. The request must contain an explanation of the necessity, purpose and business justification for participating in the Association, and must include a copy of the Association's by-laws (or similar governing documents), the Association's Code of Conduct and Antitrust Statement (if any), the name and contact information of the Association's counsel, a list of its members, and a copy of the agenda and minutes for the Association's last 3 meetings (or an explanation of why any of the foregoing are not available). The approval request package must be reviewed and approved by the Business Unit President or one of his or her designees (e.g., Reporting Unit President or Managing Director) and the Business Unit Counsel prior to any meeting participation.

¹ The Legal Department shall maintain a list of the Associations that have been approved in accordance with this policy and its predecessors.

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- 6.1.2. No membership dues or fees for an Association may be paid by CCS absent approval of the membership in accordance with this Section 6.1.
- 6.1.3. Once approved, no re-approval is required for the Approved Association. CCS management may, however, revoke the approval of an Approved Association at any time.

6.2. Approval Process: Employee Participation

The following rules govern CCS employees' approval to participate in any Association meetings, conventions or other events (other than Trade Shows):

- 6.2.1. No meeting of an Association may be attended by any CCS employee unless (a) the Association's membership has been approved in accordance with Section 6.1 above (an "Approved Association"); and (b) Business Unit Counsel, or their designee, has approved the CCS employee's participation in Approved Associations.² Exhibit B includes the standard form to be submitted to the Business Unit Counsel, or their designee, for approval. Once approved, the CCS employee shall be considered an "Approved CCS Representative".
- 6.2.2. Once an employee is approved as an Approved CCS Representative, no subsequent approval of is required for the employee to participate in any other Approved Association unless the Approved CCS Representative is contacted by the Legal Department. CCS management may, however, revoke an employee's status as an Approved CCS Representative at any time.
- 6.2.3. Participation in Associations should generally be limited to employees responsible primarily for regulatory (e.g., codes and standards), health, safety, environmental, product design, installation, and technical or engineering compliance to the extent practicable.
- 6.2.4. Employees participating in Association activity that involves codes or standards setting shall apply their best technical judgment on any proposed code or standard. Each Business Unit with input from the WHQ Sustainability, Marketing & Communications organization may establish additional procedures applicable to employees who are proposed to participate in Association activity that involves codes or standards setting. These procedures should be designed to foster cross Business Unit and Reporting Unit collaboration and cooperation and may include advance approval of any membership commencement or termination affecting codes or standards setting.
- 6.2.5. All Approved CCS Representatives must respond to a quarterly certification sent to them by the Legal Department. The certification will be in a form substantially similar to Exhibit C. The certification will, in most instances, be electronic, but an

² Note that disclosure of participation in the annual Conflict of Interest Survey or UTC Annual Certification does not constitute approval.

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Approved CCS Representative may submit or may be required to submit a manually signed form of such certification.

6.3. Review Process: Meeting Participation

6.3.1. The following rules govern CCS employees' participation in any Association meetings, conventions or other events (other than Trade Shows):

6.3.1.1. A written agenda must be provided by the Approved Association in advance of any meeting and the agenda must be submitted to the Business Unit's Legal Department in advance of the meeting, function or event. Agendas should be provided to the Legal Department as far in advance of the meeting as is practicable.

6.3.1.2. Accurate written minutes of the meeting must be provided to or by the Approved CCS Representative as soon as possible after the meeting, and the Approved CCS Representative shall promptly provide them to the Legal Department for review.

6.3.1.3. The Approved CCS Representative attending the Approved Association meeting must not participate in any formal or informal meeting of any group, sub-group or sub-committee that does not have an advance written agenda and written minutes following the meeting.

6.3.2. CCS employees (including Approved CCS Representatives) whose responsibilities include selling, marketing, advertising, promoting, or pricing of company products or services including, without limitation, managing directors, general managers and branch managers ("Sales and Marketing Employees") must either:

6.3.2.1. Contact their Reporting Unit Counsel within 14 days after the Association meeting, convention or other event and discuss the meeting, convention or other event (e.g., the topics discussed, employees and other competitors who participated, any questions or concerns that the employee may have, agenda for next meeting); or

6.3.2.2. Confirm on a quarterly basis that one or more "Non-Competitor Participants" were present during the entirety of each meeting, convention or other event he or she attended when submitting the quarterly certification pursuant to Section 6.2.5 above.

6.4. Approval Process: Social or Recreational Events

6.4.1. CCS employees shall not attend any Association function that is strictly social or recreational in nature and has no business meeting associated with it (e.g., a golf tournament or a trip that is not incidental to a business meeting) without the prior approval of the Business Unit Counsel (in the form attached as Exhibit D). Approved CCS Representatives may attend an Approved Association sponsored

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function that is social or recreational in nature without prior approval if the social event is incidental to and a part of a legitimate Approved Association business meeting (e.g., an Approved Association sponsored dinner following an Approved Association annual meeting or an Approved Association sponsored golf outing in the afternoon following a morning meeting) provided the meeting agenda has been provided to the Legal Department in advance in accordance with Section 6.3.1.1 above.

6.4.2. An Approved CCS Representative may not attend a social or recreational event if the only attendees at the social or recreational event are competitors (e.g., no golf foursomes or dinner tables comprised solely of competitors). Only the Vice President, General Counsel, the Deputy General Counsel or the Business Unit Counsel may grant an exception to this prohibition.

6.4.3. Other than Approved CCS Representatives as permitted in Section 6.4.1 above and events that are solely personal in nature³, no CCS employee shall attend any meeting, function or event where competitors may be in attendance if such is strictly social or recreational in nature (e.g., a golf tournament or dinner) without the prior approval of the Vice President, General Counsel, the Deputy General Counsel or the Business Unit Counsel (in the form attached as Exhibit D).

6.5. Attendance at Trade Shows and Other Events

6.5.1. While Business Units and Reporting Units may require advance approvals with respect to Trade Shows and similar events, this policy does not require any advance approval related to employees' participation at a Trade Show.

6.5.2. All CCS employees attending a Trade Show (as broadly defined above) shall submit a certification (in the form attached as Exhibit E) to the Legal Department, within 14 days following the Trade Show or, if the individual is also an Approved CCS Representative, list the Trade Show attendance in the next quarterly certification pursuant to Section 6.2.5 above.

6.6. Board or Committee Participation

6.6.1. Approved CCS Representatives may join a board or committee of an Approved Association (e.g., an Approved Association's board of directors or board of advisors, or a technical, standards or other committee of the Association). All participation in such boards or committees must be disclosed when the Approved Participant submits his or her quarterly certification pursuant to Section 6.2.5 above.

³ Solely personal in nature means that nothing to do with CCS' businesses is expressly or implicitly discussed. Some examples of "solely personal in nature" would be interactions at religious services or an extended family gathering. If absolutely any business or CCS-related topics are stated or discussed, the substance of this interaction must be disclosed to the Business Unit Counsel. If the meeting is social, don't discuss business.

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6.6.2. Each Business Unit with input from the WHQ Sustainability, Marketing & Communications organization may establish additional procedures applicable to employees who are proposed to participate in Association activity that involves codes or standards setting. These procedures should be designed to foster cross Business Unit and Reporting Unit collaboration and cooperation and may include advance approval of any membership commencement or termination affecting codes or standards setting.

6.7. Training Requirements

No CCS employee shall attend an Association meeting, a Trade Show or any other event likely to include CCS competitors unless within the previous 24 months the CCS employee has successfully completed 2 of the following online training modules: "Antitrust VIII: Trade Associations" plus either "Antitrust: Overview" or "Antitrust: Talking with Your Competitors"; or (in the European Union) the "EU Competition" and "EU Competition: Dealing with Competitors" online training modules; or (in Australia) the "Antitrust Overview" and "UTC Fire & Security - Australia Trade Practices Act Compliance" online training modules or a translation in another language of one of the module sets; or such other online training modules that are approved by the CCS Legal Department; or received live (i.e., in-person, telephonic or live webcast) training regarding antitrust and Trade Show participation from the Legal Department.

6.8. Potential Incidents

If, at any time during an Association meeting, a Trade Show or any other event, any issue that may affect competition is discussed (as defined by the training reference materials in Section 8 below), the CCS employee involved in the discussion shall immediately announce his/her objection, request that their objection be recorded in the minutes (if applicable), and then leave the discussion. The CCS employee shall report any such incident immediately to the Legal Department.

6.9. Annual Review

6.9.1. The Business Unit President and the Business Unit Counsel, or their respective designees, shall periodically (but at least annually) review the Associations to which the Business Unit, companies in the Business Unit or employees on behalf of the Business Unit belong or participate or desire to become members or participate. The Business Unit shall establish its own process for conducting this review. Such process shall include at least a review of the Association's stated purpose, the business benefit of membership/participation, membership criteria, current membership role, dues or other expenses associated with membership in the Association, lobbying activities and lobbying expenses. On the basis of this review, the Business Unit President, in conjunction with the Business Unit Counsel, shall determine whether membership/participation in the Association is in the best interest of the company.

6.9.2. The Business Unit President and the Business Unit Counsel, or their respective designees, shall periodically (but at least annually) review the individuals who are

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members of or participate in Associations on behalf of the Business Unit. Such process shall include at least a review of the individual's position/responsibilities, previous compliance with these Association procedures and training on antitrust considerations. On the basis of this review, the Business Unit President, in conjunction with the Business Unit Counsel, shall determine whether the participation of each individual poses an undue antitrust risk.

6.9.3. The Business Unit Counsel will confirm to the Vice President, General Counsel that the above review has been completed by the end of Q1 of each year.

7. POLICY IMPLEMENTATION

This policy is effective immediately; however, Business Units have a 60-day grace period from the policy's revised effective date to come into compliance. Unless otherwise required by the Business Unit, Trade Association membership or participation or Trade Show attendance may be reviewed under the CCS policy that preceded this policy provided such review and approval is completed within such 60-day grace period.

8. REFERENCES & ATTACHMENTS

UTC Corporate Policy Manual: [Section 3, Antitrust Compliance](#)
UTC Policy Clarification Circular: [Conflicts of Interest](#)
UTC Policy Clarification Circular: [Antitrust Guide For Employees](#)
UTC Policy Clarification Circular: [Gathering Competitive Information](#)
CCS Antitrust Policy
Attachment 1: Trade Association DOs and DON'Ts

9. NATURE OF CHANGE

Revised approval requirements.

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EXHIBIT A

APPROVAL FORM

FOR APPROVAL OF TRADE ASSOCIATION NOT PREVIOUSLY APPROVED

1. Requesting Employee Name and Title:	
2. Requesting CCS Reporting Unit (i.e., business entity):	
3. Name of Association:	
4. Products or services covered by the Association:	
5. Association's geographic coverage:	
6. Business justification for joining Association:	
7. Is the Association involved in codes or standards setting or similar activity? If yes, describe:	
8. Name and contact information of Association's counsel:	
9. Names of current Association members (attach if required):	
10. Attach By-laws (or other similar governing documents), Code of Conduct and Antitrust Statement (if any):	

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11. Attach Agenda and Minutes from last 3 Association meetings:	
12. Participation cost (annual):	
13. Is the Association engaged in any lobbying activity (directly or indirectly)? If yes, describe.	
14. Who is your primary contact within the CCS Legal Department?	

 [Requesting Employee Name]
 [Title]
 [Reporting Unit]

 [Name]
 [Business Unit Counsel] or
 [Deputy General Counsel (if WHQ)]

 [Name of Requesting Employee's Supervisor]
 [Title]
 [Reporting Unit]

 [Name]
 [Reporting Unit President or Managing Director]

- Instructions:**
1. Send the completed form to the CCS Legal Department by either
 - a. sending to the lawyer responsible for your Reporting Unit or
 - b. sending to the centralized Outlook mailbox ([GP CAR Trade Association](#)) noted below.
 E-Mail to: GPCARtradeassociation@carrier.utc.com
 or eFax: 860-660-7835
 2. Contact the Legal Department with any questions.

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EXHIBIT B

**APPROVAL FORM
FOR EMPLOYEE PARTICIPATION IN AN APPROVED TRADE ASSOCIATION**

1. Requesting Employee Name and Title:	
2. Requesting Employee's CCS Reporting Unit (i.e., business entity):	
3. Requesting Employee's Job Description / Functional Area (e.g., engineering, marketing, EH&S):	
<p>4. Do your work responsibilities include selling, marketing, advertising, promoting, or pricing of company products or services? Are you a managing director, general manager or branch manager?</p> <p><i>If yes, note that you must either: (i) contact the CCS Legal Department within 14 days after each Association event to discuss the event; or (ii) confirm on a quarterly basis that one or more "Non-Competitor Participants" were present during the entirety of each event. See §6.3.2 of the Policy.</i></p>	
5. Name of Approved Trade Association:	
6. Products or services covered by the Association:	
7. Name of your direct supervisor:	
8. Length of your employment with CCS and any other information that would assist in the review of this request:	
9. Business justification for joining Association:	

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10. Why were you selected to be a CCS Representative for this Association?	
11. Will you be participating on a board or committee of the Association (e.g., board of directors or board of advisors, or a technical, standards or other committee of the Association)? If yes, describe the following: <ul style="list-style-type: none"> a. Name of board or committee: b. Position on board or committee: c. Term of position: d. Is position appointed or elected? e. Is position paid or volunteer? If paid, please provide compensation details. 	
12. Is the Association involved in codes or standards setting or similar activity? If yes, describe:	
13. Committee(s) or Chapter(s) or Section(s) to be joined (if applicable):	
14. What is the business justification for joining the Committee/Chapter/Section:	
15. Participation cost (annual):	
16. Is the Association engaged in any lobbying activity (directly or indirectly)? If yes, describe.	

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<p>17. Did you complete the required training pursuant to the Trade Association Policy in the last 24 months (either live training from Legal Department or 2 on-line modules: "Antitrust VIII: Trade Associations" plus either "Antitrust: Overview" or "Antitrust: Talking with Your Competitors"; or (in the European Union) the "EU Competition" and "EU Competition: Dealing with Competitors" online modules; or (in Australia) the "Antitrust Overview" and "UTC Fire & Security - Australia Trade Practices Act Compliance":</p>	
<p>18. Have you read and understood the Trade Association Policy (Y / N)? If no, please explain.</p>	
<p>19. Who is your primary contact within the CCS Legal Department?</p>	

[Requesting Employee Name]
[Title]
[Reporting Unit]

[Name]
[Business Unit Counsel] or
[Deputy General Counsel (if WHQ)]

[Name of Requesting Employee's Supervisor]
[Title]
[Reporting Unit]

[Name]
[Reporting Unit President or Managing Director]

Instructions:

1. Send the completed form to the CCS Legal Department by either
 - a. sending to the lawyer responsible for your Reporting Unit or
 - b. sending to the centralized Outlook mailbox ([GP CAR Trade Association](#)) noted below.
E-Mail to: GPCARtradeassociation@carrier.utc.com
or eFax: 860-660-7835
2. Contact the Legal Department with any questions.

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EXHIBIT C

QUARTERLY CERTIFICATION

1. Name:

2. Job Description / Functional Area (e.g., engineering, marketing, EH&S):

3. CCS Business Unit (i.e., EMEA, Asia, Americas, Transicold)

4. CCS Reporting Unit / Local Entity (e.g., Interlogix, Transicold Germany, Fuerda, UTEC):

5. I understand and have fully complied with CCS' Policy LGL-9, Antitrust Compliance.
 - Yes I have questions or concerns and would like to be contacted by the CCS Legal Department

6. I understand that compliance with antitrust laws is a condition of employment with UTC and CCS.
 - Yes I have questions or concerns and would like to be contacted by the CCS Legal Department

7. Did you participate in any Association meeting or Trade Show during this past Quarter?
 - Yes No

 - a. If yes to question 3, have you received antitrust training in the last 24 months (either live training from the Legal Department or successful completion of two (2) of the online training modules as listed in the Trade Association Policy)?
 - Yes No

 - b. If yes to question 3, did you submit a meeting notice/agenda for each Association meeting?
 - Yes No

8. In the past 12 months, I have attended a meeting or other event of the following Trade Associations:

9. During the Quarter immediately preceding this Certification (i.e., the previous three (3) full calendar months), I participated in the following meetings with competitors (e.g., Trade Association or Trade Show activity):

10. The following is the complete list of Trade Association boards and/or committees (e.g., board of directors or board of advisors, or a technical, standards or other committee of an Association) where I am a member or otherwise participate.

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11. Does your position with any Association involve codes &/or standards? If yes, please specify.

12. I confirm that I had no improper discussions with competitors (such as discussions of pricing, margins, surcharges, customers, bids, markets, volumes, forecasts, terms and conditions of sale to customers, customer credit, costs, suppliers or production capacity) during the Quarter immediately preceding this Certification (the previous three (3) full calendar months).

Confirmed I have questions or concerns, or am uncertain and would like to be contacted by the Legal Dept

13. I confirm that I did not attend any strictly social events with competitors unless approved in advance by the CCS Legal Department.

Confirmed I have questions or concerns, or am uncertain and would like to be contacted by the Legal Dept

14. I confirm that one or more "Non-Competitor Participant(s)"⁴ were present during the entirety of each such meeting, convention or other event that I attended during this Quarter.

Yes No

a. If yes to question 8, please state the name, title and organization (e.g., business or government agency) of at least one such Non-Competitor Participant.

b. If no to question 8, did you talk to your Reporting Unit Counsel within 14 days after the meeting, convention or other event and discuss the meeting, convention or other event (e.g., the topics discussed, employees and other competitors who participated, any questions or concerns that the employee may have, agenda for next meeting)

Yes No

15. I confirm that the answers I provide here are truthful, accurate and complete. I understand that, to the fullest extent of applicable law, any knowingly false, inaccurate, misleading or incomplete answer may be reason for termination of my employment.

Yes No

Instructions:

1. Unless otherwise notified, this Quarterly Certification should be completed online upon request by the CCS Legal Department.
2. Contact the Legal Department with any questions.

⁴ "Non-Competitor Participant(s)" includes (i) actual or potential customers (who are not also competitors); (ii) government representatives (who are present primarily in a regulatory, compliance or enforcement capacity); or (iii) a lawyer approved by CCS in-house counsel (which may include in-house counsel, outside counsel or the Association's counsel)

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EXHIBIT D

SOCIAL/RECREATIONAL EVENT - REQUEST FOR APPROVAL

1. Requesting Employee Name and Title:	
2. Requesting CCS Reporting Unit (i.e., business entity):	
3. Is employee an Approved Participant in Trade Association events?	
4. Name of Approved Trade Association:	
5. Name & date of the event (attach copy of notice of the event):	
6. Business justification for attending event:	

[Requesting Employee Name]
[Title]

[Name]
[Reporting Unit Counsel]

[Name of Requesting Employee's Supervisor]
[Title]
[Reporting Unit]

[Name]
[Business Unit Counsel] or
[Deputy General Counsel (if WHQ)]

Instructions:

1. Send the completed form to the CCS Legal Department by either
 - a. sending to the lawyer responsible for your Reporting Unit or
 - b. sending to the centralized Outlook mailbox ([GP CAR Trade Association](#)) noted below.
E-Mail to: GPCARtradeassociation@carrier.utc.com
or eFax: 860-660-7835
2. Contact the Legal Department with any questions.

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EXHIBIT E

**CERTIFICATION REGARDING TRADE SHOW / OTHER EVENT
ANTITRUST COMPLIANCE**

1. Employee Name and Title:	
2. Employee's CCS Reporting Unit (i.e., business entity):	
3. I attended the following trade show, convention or event: (Include name of the meeting, date and location)	
4. The business purpose of the trade show/event was:	
5. The other CCS attendees at the trade show/event were:	
6. Did you have any contact with CCS' competitors? If yes, please describe the contacts that you had.	<input type="checkbox"/> Yes <input type="checkbox"/> No
7. I hereby further certify to the following:	
a. I received antitrust training during the 24 month period prior to this trade show/event (either live training or completion of 2 of the required online modules).	<input type="checkbox"/> Yes <input type="checkbox"/> No
b. I am not aware of any improper discussions concerning competitive topics at or in conjunction with this trade show/event or any of its activities (e.g., no discussions of pricing, margins, customers, bids, markets, volumes, forecasts, terms and conditions, credit, costs, suppliers, or production capacity).	<input type="checkbox"/> True <input type="checkbox"/> I have questions or concerns and would like to be contacted by the CCS Legal Department
c. I did not engage in any social or recreational activities in relation to this trade show/event other than as listed directly here:	Location and type of social or recreational activity: _____ _____.

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	<p>List the names and business affiliations of all persons who participated in the social or recreational activity with you, and specifically note if a person is a competitor:</p> <p>_____</p> <p>_____</p> <p>_____</p> <p>_____</p> <p>What, if anything, was discussed with any competitors during this activity:</p> <p>_____</p> <p>_____</p> <p>_____</p> <p>_____</p>
<p>d. I understand and have fully complied with CCS' Policy LGL-9, Antitrust Compliance.</p>	<p><input type="checkbox"/> Yes</p> <p><input type="checkbox"/> I have questions or concerns and would like to be contacted by the CCS Legal Department</p>

[Requesting Employee Name]
[Title]

If you complete this form electronically, certify the truthfulness of your submission by checking this block.

Instructions:

1. Certifications must be sent to the CCS Legal Department within 14 days after returning from a Trade Show, convention or event. If you are unable to certify, contact your Reporting Unit Counsel.
2. Send the completed form to the CCS Legal Department by either
 - a. sending to the lawyer responsible for your Reporting Unit or
 - b. sending to the centralized Outlook mailbox ([GP CAR Trade Association](#)) noted below.

E-Mail to: GPCARtradeassociation@carrier.utc.com
or eFax: 860-660-7835
3. Contact the Legal Department with any questions.

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ATTACHMENT 1

**TRADE ASSOCIATIONS
DOs and DON'TS**

These **DOs & DON'Ts** are intended to assist CCS officers and employees worldwide to comply with UTC policies and procedures when participating in trade associations. Any deviation from these guidelines should be approved in advance by the CCS Legal Department.

Questions should be directed to the CCS Legal Department.

<u>DO</u>	<u>DON'T</u>
DO participate in trade associations connected with your business that perform useful, legitimate and pro-competitive functions if your participation has been approved by the Legal Department.	DON'T participate in any trade association without the prior approvals required by the Legal Department.
DO remember that CCS must make its own independent decisions and not discuss with competitors, where, when and to whom it will offer or actually sell its products and services as well as at what prices and terms.	DON'T discuss or agree (in writing, orally, or through non-verbal actions) with competitors about: <ul style="list-style-type: none"> Customers, suppliers, or other competitors; Prices, pricing or methods of calculating prices, or the timing of price changes; Costs of products or services, margins or discounts; any terms and conditions of sale or purchase (e.g., credit terms, payment terms, promotion programs, discounts, service charges, delivery terms); decisions to quote or not to quote on products, components, spare parts, or services; sales territories; product or service offerings; sales volumes, production capacity or volume; market shares; and non-public investment decisions, research and development spending, or technology.

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POLICIES & STANDARD WORK INSTRUCTIONS

Trade Associations

ATTACHMENT 1 (cont'd)

<u>DO</u>	<u>DON'T</u>
<p>DO participate in trade associations which have a written charter that clearly states the mission and purpose of the association. DO review the association's charter with the Legal Department.</p>	<p>DON'T participate in a trade association without a written charter that clearly states a legitimate (pro-competitive) mission and purpose for the association and prohibits any anti-competitive activities and discussions.</p> <p>DON'T participate in an association that does not carefully follow the legitimate purposes established in a written charter.</p>
<p>DO participate in trade associations that focus on legitimate and proper subjects, such as discussing safety improvements, efforts to support pro-consumer government regulations, and code adoptions and modifications.</p>	<p>DON'T have any formal or informal communication, whether during or after business hours, with any competitor about the prohibited subjects outlined above.</p>
<p>DO be certain at all times that any meetings or discussions focus only on pro-competitive activities, such as improving safety, the adoption of codes, changes to existing codes, the setting of product standards, and adopting national or local laws which have pro-consumer impact.</p>	<p>DON'T participate in trade associations or any other meeting with competitors where the purpose, intent or effect is anti-consumer or to limit competition.</p>
<p>DO obtain an agenda before each trade association or committee meeting and DO attend only if the agenda items cover proper subjects for discussion among competitors.</p>	

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POLICIES & STANDARD WORK INSTRUCTIONS

Trade Associations

ATTACHMENT 1 (cont'd)

<u>DO</u>	<u>DON'T</u>
<p>DO object immediately if a prohibited subject is raised at trade association meetings or elsewhere and, if the prohibited conduct continues,</p> <p>DO state your reasons for leaving emphatically,</p> <p>DO take some action which others will remember (e.g., spill your coffee, knock over your chair),</p> <p>DO depart immediately, and</p> <p>DO contact the Legal Department promptly.</p>	<p>DON'T participate in a conversation or communication with any competitor if that competitor starts to discuss any of the topics prohibited above.</p> <p>DON'T let others infer or assume your assent or agreement to any anti-competitive statements from your conduct or by your silence.</p>
<p>DO obtain information within the trade association only when such information promotes the legitimate purposes of the association as noted above.</p>	<p>DON'T provide any information within the trade association on a prohibited subject (outlined above).</p> <p>DON'T provide any marketing information without prior review and approval by the Legal Department.</p>
<p>DO recommend that the association provide training once a year to its members on the limitations of competitive discussions and activities.</p> <p>DO request the trade association to issue antitrust compliance guidelines.</p>	<p>DON'T participate in any trade association that does not provide antitrust compliance guidelines unless the Legal Department has reviewed your participation.</p>
<p>DO participate in standard and code setting activities that are relevant to CCS' products and/or services if your participation has been approved by the Legal Department.</p> <p>DO ensure that you understand CCS' relevant patent position prior to participating.</p> <p>DO ensure that you understand the patent disclosure and licensing policies that the standard setting organization may have.</p>	<p>DON'T disclose any CCS intellectual property without first discussing the nature of the proposed disclosure with the Legal Department.</p> <p>DON'T withhold information regarding CCS' patent portfolio if required by the standard setting organization and if the disclosure was approved by the Legal Department.</p>