

Otis Supplier Code of Conduct

SAFETY | ETHICS | QUALITY

everyone, everywhere, every day

At Otis, our [Absolutes](#) - Safety, Ethics, and Quality - define how we think, how we make decisions, and how we take action.

Our suppliers are critical to our success. To provide superior Otis products and services in a responsible manner, we require you, our suppliers, and everyone you work with, to share our commitment to meeting these Absolutes. In many cases your contract with Otis may require your compliance with even more stringent or specific requirements.

SAFETY

Nothing is more important than safety – the safety of Otis personnel, our suppliers, our customers, and the public who ride our products. Safety is at the heart of everything Otis does, and we expect the same commitment to safety by our suppliers. We expect that our suppliers will:

- Assure a safe and healthy work environment for your employees, including reasonable work hours and conditions, as well as your business invitees.
- Comply with or exceed all applicable environmental, health and safety rules, including those regarding, chemicals, persistent organic pollutants, hazardous waste, noise, and preservation of soil, water, and air. Train employees on the same.
- Conduct your end-to-end operations in an environmentally friendly manner: minimize waste, emissions, materials of concern, and consumption of energy, water and raw materials in your sourcing, manufacture, packaging, and transportation processes. If you must use chemicals or other materials that pose a hazard to the environment, ensure that they are handled, stored, managed, and disposed of in a safe manner.
- You are encouraged to track, document, and publicly report your greenhouse gas emissions and develop an associated reduction plan.
- When you are occupying or using land, keep in mind principles of sustainable development and management, preservation of the environment, respect the rights of those who have claims to the land, and consider your impact to the community.
- Provide products and services with safety as a key guiding principle.
- Comply, and ensure your shipping and packaging suppliers comply, with all requirements of Standards to Secure and Facilitate Global Trade (SAFE) Framework security programs of the destination country. For instance, the Customs-Trade Partnership Against Terrorism initiative of the United States Department of Homeland Security (C-TPAT), Authorized Economic Operator (AEO), or similar programs.

At Otis, we are determined to comply with regulatory and customer requirements regarding the prohibition and restriction of substances and materials, including hazardous substances and conflict minerals. Therefore, you must ensure that all products and services you provide to Otis comply with applicable regulations. In particular, you will:

- Declare to Otis substances of concern contained in the goods you supply to us.

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- Implement policy and procedural processes regarding conflict minerals and exercise due diligence to investigate the source of these minerals and, in a timely manner, address any findings of concern.
- Respond in a timely manner to Otis' requests for evidence of your compliance with these requirements.

ETHICS

Millions of people trust Otis because they know that we do business the right way: the ethical, lawful, and honest way. We expect our suppliers to operate with the same commitment to integrity. In addition to respecting all applicable laws and regulations, **you must:**

- **Respect the fundamental rights and freedoms of all persons who touch your business operations, treat all persons fairly with dignity and respect, and abide by all fair labor practices.** Provide all employees, contractors, temporary workers, business partners, jobseekers, and potential business partners with equal opportunity without discrimination and free of discriminatory selection criteria. For instance, no discrimination based on:
 - race, ethnicity, color;
 - religion;
 - sex, sexual orientation, sex stereotyping, pregnancy (which includes pregnancy, childbirth, and medical conditions related to pregnancy, childbirth, or breastfeeding), gender, gender identity, gender expression, national origin;
 - age;
 - mental or physical disability, medical condition, genetic information;
 - culture, ancestry, national origin, language, citizenship status;
 - socio-economic, marital, military or veteran status;
 - any other protected status.
- Respect employee rights to freely associate and bargain collectively as they exist under applicable laws in the countries where you operate.
- Comply with all rules and applicable regulations prohibiting human trafficking, child labor and forced labor, with regard to your employees, contractors and all other persons in your supply chain. Ensure:
 - All work is performed voluntarily.
 - No forced labor by means of violence, threats, or illegal restrictions on personal freedom.
 - Employers and agents may not hold or otherwise destroy, conceal, or confiscate identity or immigration documents, such as government-issued identification, passports, or work permits unless required by law. In this case, at no time should workers be denied access to their documents.
 - No worker is pressured or required to perform tasks that will endanger the personal safety of themselves or others.
 - No child labor or presence of situations where children are subjected to slavery or similar practices or engaged in hazardous work.

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- Respect of the UN Convention n° 138 on the Rights of the Child and the ILO Convention n° 182 on the Worst Forms of Child Labour. Note: UN Convention n° 138 defines a child as person under the age of 18, but applicable national laws always prevail.
- No use of other prohibited forms of labor including trafficking of persons, bonded labor, recruiting for labor or services by means of fraud, trickery, threat, or by taking advantage of another person's difficulties or vulnerabilities including anything that would cause the person to believe their safety or the safety of a person known to them would be threatened if they failed to provide or offer to provide the labor or service.
- Workers shall not be required to pay employers' agents recruitment fees or other related fees for their employment.
- Workers' rights to rest and vacation are respected.
- Ensure goods and services are not mined, produced, or manufactured wholly or in part with prohibited forms of labor.
- Ensure that employees can perform their work in an environment free from physical, psychological, or verbal harassment or intimidation, or any other form of abusive conduct. No unnecessary interference by security forces.
- Pay all workers a living wage and benefits which meets or exceeds the applicable minimum wage and provide equal pay for equal work. Do not unnecessarily withhold wages; any withholding must be permitted and authorized under applicable law.
- Ensure that work hours are reasonable and do not exceed the maximum work hours established by law.

Respect anti-corruption, fair competition, and antitrust rules

- Only compete on the basis of the merits of your products and services.
- Never engage in anti-competitive or unfair conduct, whether on behalf of Otis, yourself, or others.
 - Never rig bids, fix prices, share competitively sensitive information, allocate customers or markets.
 - Never engage in other unfair market practices.
 - Never make misrepresentations regarding Otis' products or services, your products or services, or the products or services of others.
- Refrain from payments, services, gifts, entertainment, or other items to create advantages which are intended to influence the way in which an Otis employee or anybody else goes about their duties.
- Do not give gifts or entertainment to Otis employees.
- Never pay a bribe or make a corrupt payment in any amount, to anyone, anywhere, for any reason whatsoever, whether on Otis' behalf, your behalf, or on behalf of others.
- Treat all employees and business partners fairly with transparent decisions made based only on merit and other factors related to legitimate business interests, and without regard to race, religion, color, age, gender, gender identity or expression, sexual orientation, national origin, marital status, veteran status, or disability.

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- Avoid and report all conflicts of interest and any situations which could give the appearance or perception of a conflict of interest in your dealings with or on behalf of Otis.

Protect information and respect IP and other rights

- Respect the legitimate proprietary rights and intellectual property (IP) rights of Otis and others.
- Take proper care to protect sensitive information, including confidential, proprietary, and personal information. Collect this information only when necessary and legally allowable.
- Protect all information we provide to you and information that you generate or develop in support of our programs from unauthorized access, destruction, use, modification, or disclosure.
- Never use material, non-publicly disclosed information obtained during your business relationship with Otis as the basis for trading or enabling others to trade in the stock or securities of Otis or any other company.

Maintain accurate records

- Promptly and accurately record all transactions and expenses related to Otis in your books and records.

QUALITY

Everything Otis does needs to meet the very definition of outstanding quality. We rely on our suppliers to have the same commitment and focus to quality. You must:

- Have quality assurance processes to detect, to notify Otis, and to correct defects in a timely manner to ensure delivery of products and services that meet all contractual, legal, and regulatory requirements.
- Properly complete all inspection and testing requirements performed by appropriately authorized and qualified individuals.
- Complete required certifications accurately.
- Cooperate with our reasonable requests for information and support when we are investigating a potential or confirmed quality issue related to your products or services.

HANDLING MISCONDUCT

If you suspect or become aware of misconduct related to Otis business, you must promptly notify Otis. The easiest way is to send an email to Otis Global Ethics & Compliance at ethics@otis.com. For information on other reporting channels, including anonymous reporting, please visit www.otis.com/reportingchannels.

You must facilitate the timely discovery, investigation, and reporting of actual or suspected misconduct and implement appropriate corrective actions.

We also expect you to offer your employees and your business partners adequate reporting channels, including anonymous reporting methods and support a speak up

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culture where legal or ethical concerns are raised **without fear of retaliation**. You cannot take any adverse action against anyone who reports conduct that they reasonably believe to be illegal or in violation of this Code or in violation of [The Otis Absolutes](#).

COMMUNICATING AND ENSURING COMPLIANCE TO REQUIREMENTS

We expect you to promote a commitment to ethical business practices and a commitment to the expectations in this Code. This includes:

- Providing training to your employees on compliance requirements and the expectations in this Code.
- Conducting reasonable due diligence to ensure compliance.
- Ensuring timely reporting of both actual and suspected violations.

You will permit Otis and its representatives to assess your compliance with the expectations in this Code. This includes on-site inspection of facilities and review of associated books, records, and other documentation. Upon request, you must provide Otis with additional information and certifications evidencing compliance.

If your contract with Otis permits you to assign, delegate, or subcontract your obligations or to procure products or services from others that will be incorporated in products or services acquired by Otis, you must flow down the principles in this Code to these business partners. We will hold you responsible for ensuring compliance by your business partners and you must ensure that Otis has the right to also assess your business partners' compliance with the expectations in this Code in performing work for Otis including our right for on-site inspection of facilities and review of associated books, records, and other documentation.

In the event of wrongdoing, you will cooperate with Otis for a full and fair investigation. You will ensure that your business partners also fully cooperate if such investigation involves their performance. You and your business partners must correct any non-conformances identified during assessments.

This Code applies to all parties who provide materials, products, or services to Otis, including but not limited to direct and indirect suppliers, distributors, licensees, and subcontractors. Your acceptance of a purchase order and/or your supply of goods or services constitutes your acceptance of the terms set forth in this Code.

Otis does not assume any duty to monitor or ensure compliance with this Code, and you agree that you are solely responsible for full compliance by your directors, officers, employees, representatives, and business partners. While Otis routinely seeks to partner with our suppliers to improve compliance with the principles set forth herein, we may at any time choose to terminate our relationship with any supplier that fails to meet our expectations under this Code.

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QUESTIONS ?

For questions or concerns about this Code, you can contact your Otis Supply Chain representative or Otis Global Ethics & Compliance at ethics@otis.com.