



SECTION 8: Anti-Corruption

- A. SUMMARY
- B. POLICY
- C. RESPONSIBILITIES
- D. DEFINITIONS
- E. REFERENCES

PRINTED COPIES OF THIS DOCUMENT ARE UNCONTROLLED - PLEASE VERIFY CURRENT ISSUE BEFORE USE



A. SUMMARY

Carrier shall compete for business and pursue other business objectives solely on the merits. No corrupt payment, in any amount or form, shall be authorized, offered, promised, or made by or on behalf of Carrier to anyone, anywhere, for any purpose. Carrier's **Books and Records** shall accurately record all company assets, liabilities, and transactions. No deliberately false or misleading entry shall be made in company **Books and Records**, and no alternate set of **Books and Records** or unrecorded fund or asset shall be established. Carrier shall prevent its assets from being used for money laundering or terrorist financing. This absolute prohibition against corrupt payments, non-transparent books and records, and money laundering or terrorist financing will be broadly construed and strictly enforced.

B. POLICY

No **Corrupt Payment**, in any amount or form, shall be authorized, offered, promised, or made, directly or indirectly, by or on behalf of Carrier to anyone, anywhere, for any purpose. Carrier will terminate the employment of any employee who authorizes, offers, promises, or makes, directly or indirectly, any **Corrupt Payment** by or on behalf of Carrier.

Carrier may offer and provide **Political Contributions** (CPM 12: Government Relations), **Philanthropic Donations** (CPM 11: Social Responsibility), **Business Gifts** (CPSW-8A: Giving Business Gifts), and **Sponsored Travel** (CPMSW-8B: Sponsoring Third Party Travel) when bona fide and offered and provided solely for the purpose authorized by, and approved in strict conformity with, the foregoing referenced policies or procedures and standard work instructions, as the case may be.

Discussions with and offers to current and former **Government Officials** and **Related Parties** of current **Government Officials** regarding their hire or retention by Carrier as employees or as **Vendors** shall comply with CPSW-8C: Hiring and Retaining Current and Former Government Officials and Their Relatives.

Vendors shall be required to categorically refrain from authorizing, offering, promising, making, or otherwise facilitating in any manner, any **Corrupt Payment** by or on behalf of Carrier. Carrier shall not retain prospective and terminate existing **Vendors** that are unable or unwilling to comply. All **Collection Agencies**, **Consultants**, **Customs Brokers**, **Field Contractors**, **Immigration Vendors**, **Tax Consultants** and **Travel Agencies** (CPSW-8F: Service Vendors), Lobbyists (CPSW-8D: Lobbyists), and Distributors and Non-Employee Sales Representatives (including **NSRs** furnishing **U.S. Government Marketing** or **U.S. Government Sales**) (CPSW-8E: Distributors and Non-Employee Sales Representatives) shall be selected, screened, retained, monitored, and



managed in strict conformity with the foregoing referenced procedures and standard work instructions.

Joint ventures (equity or contractual) over which Carrier exerts **Control** shall adopt and implement this Policy. To ensure adoption and implementation of this Policy in joint ventures (equity or contractual) where Carrier lacks **Control**, requirements substantially similar to this Policy shall be incorporated into the joint venture agreement (before closing or upon renewal/amendment) or annually adopted by the shareholders, board of directors, or other governance body of the venture.

Whether or not it will acquire **Control**, Carrier shall conduct thorough due diligence of all acquisition targets for potential **Corrupt Payments** including, without limitation, interviews of key management personnel, and promptly disclose, address, and fully mitigate all material findings in internal approval documents, definitive agreements, and integration plans (see CPM 15: Acquisitions, Divestitures, Joint Ventures & Mergers).

Carrier shall prevent its assets from being used for money laundering or terrorist financing by remaining alert to warning signs and following international regulations in accordance with CPSW-8G: Anti-Money Laundering.

The **Books and Records** of each Reporting Unit shall accurately record all assets, liabilities, and transactions of the Reporting Unit. No deliberately false, incomplete, or otherwise misleading entry in any **Books and Records**, false or alternate set of **Books and Records**, or undisclosed or unrecorded fund or asset shall be authorized, made, or established for any purpose. No payment by or on behalf of Carrier will be authorized, offered, promised, or made with the intention or understanding that any part of such payment is to be used for a purpose other than that described in the **Books and Records**.

Each member of the Carrier Board of Directors, all other Carrier directors (employee or non-employee), and all Carrier officers and indirect/salaried employees shall annually represent in writing that he or she is either aware or not aware of a **Corrupt Payment**, or other violation of this Policy, that has not been formally reported to Carrier ethics and compliance personnel or legal counsel. Unless prohibited by local law or other restrictions (e.g., works councils, collection bargaining agreements), annual representation is mandatory for indirect/salaried employees, and directors and officers over whom Carrier has the power of removal. To facilitate participation by non-employee directors, the board of directors or other governance body may, in lieu of individual representations, provide an annual representation by way of resolution signed by all directors or members. To ensure appropriate investigation, and that refusal is not based upon knowledge of a **Corrupt Payment**, RU Legal Counsel shall contact each respondent who either reports awareness of matters or refuses to provide a written representation.



C. RESPONSIBILITIES

The VP GEC is responsible for interpretation and will review this Policy biennially.

The Carrier Vice President, Controller, will incorporate controls and testing procedures in applicable common controls matrices, and the Carrier Vice President, Internal Audit, will conduct periodic audits (including Compliance Audits (see CPM 4: Global Ethics and Compliance Program)), in each case to assess compliance at the Reporting Unit level. Within the regular scope of its annual financial audits, Carrier's independent auditor will also review such controls and transactions to ensure compliance.

Each Reporting Unit president or chief executive shall maintain an internal control program adequate to ensure compliance with this policy.

D. DEFINITIONS

All capitalized terms not defined in this policy are defined in [CPM 1: Governance and Definitions](#) including [Exhibit 1: Compliance Glossary](#)

E. REFERENCES

All referenced CPM and CPSW can be retrieved from [ePolicy](#)

CPM 1: Governance & Definitions

CPSW-8A: Giving Business Gifts

CPSW-8B: Sponsoring Third Party Travel

CPSW-8C: Hiring and Retaining Current and Former Government Officials and Their Relatives

CPSW-8D: Lobbyists

CPSW-8E: Non-Employee Sales Representatives

CPSW-8F: Service Vendors

CPSW-8G: Anti-Money Laundering

CPM 11: Philanthropic Donations

CPM 12: Government Relations

CPM 15: Mergers, Acquisitions, Divestitures, Joint Ventures, Securities Purchases and Sale of Assets or Intangibles