

Anti-Corruption

More detailed policies for certain situations where anti-corruption issues may arise:

- [CPM48A](#) *Giving business gift or entertainment*
- [CPM48B](#) *Sponsoring travel and accommodation for Otis visitors*
- [CPM48C](#) *Hiring and retaining current and former government official and their relatives*
- [CPM48D](#) *Lobbyists*
- [CPM48E](#) *Distributors and non-employee sales representatives*

Policy owner VP, General Counsel

ANTI-CORRUPTION POLICY STATEMENT

At Otis, we do business the right way, and we do not tolerate bribery or corruption. Otis will compete for and pursue all business objectives solely on the merits. Otis prohibits all corrupt payments in connection with Otis business.

Otis officers, directors, and employees may not directly, or indirectly through a third party:

- offer, promise, pay, give, or authorize any financial or other advantage, or anything else of value, to any other person or organization, with the intent to improperly influence the recipient, induce the recipient to violate his or her duties, secure an improper advantage for Otis, or improperly reward the recipient for past conduct; or
- request, agree to receive, or accept a bribe, kickback, improper benefit, or any other financial or other advantage that would compromise the ability to make an objective and fair decision.

This Policy, together with CPM 48A, B, C, D and E, sets forth Otis' commitment to doing business the right way, always.

Otis will never penalize an employee or any third party for any delay or loss of business resulting from refusing to engage in bribery or corruption, even if doing so results in the loss of business opportunities. Otis may terminate any employee who violates this policy.

Otis' commitment to competing for business solely on the merits and without corrupt influence applies in all circumstances. However, certain practices and relationships present heightened risk for Otis and warrant special policy consideration, as identified below.

INTERACTIONS WITH GOVERNMENT OFFICIALS

Offering or providing money or other things of value to government officials can raise special risks under anti-corruption laws and should be approached with heightened caution. Otis employees who interact with government officials must take particular care to ensure that any interaction with a government official complies with all applicable laws and regulations, with the internal rules of the government official's organization, and with Otis policies and procedures.

In this Policy, "**government official**" refers to:

- officers and employees of any national, regional, local, or other governmental entity;
- candidates for political office and elected government officials at any level of government;
- employees of government-owned or government-controlled companies;
- political parties and party officials;
- officers and employees of a public international organization (e.g. OECD, United Nations); and
- any other person acting in an official capacity for or on behalf of any of the foregoing.

GIVING BUSINESS GIFTS, MEALS, AND ENTERTAINMENT

Otis employees may offer or give business gifts such as promotional items, meals, and other forms of generally recognized hospitality when reasonable in value and frequency, related to legitimate company activities, and provided openly and transparently. Business gifts or hospitality offered or given to corruptly influence, or that might create the appearance of corruption or impropriety (i.e. lavish, frequent, unprofessional, unrelated to company business, or concealed), are prohibited.

Additional information regarding giving business gifts can be found in [CPM48A](#).

SPONSORING TRAVEL

Otis may, in limited circumstances, sponsor certain travel expenses of third parties when they are directly related to legitimate company business activities, are reasonable in value and frequency, provided openly and transparently, and with proper approvals where necessary. Otis may also provide limited immigration assistance to facilitate third party participation in such business related activities.

Sponsored travel or immigration assistance offered, promised, or provided to improperly influence, or which might create the appearance of corruption or impropriety (i.e. lavish, frequent, unrelated to legitimate company-business activities, or concealed), or without proper approval where necessary, are prohibited.

Additional information regarding sponsoring travel can be found in [CPM48B](#).

HIRING & RETAINING CURRENT OR FORMER GOVERNMENT OFFICIALS OR THEIR RELATIVES

Discussions with and offers to current and former government officials and their relatives regarding a potential job offer or retention as an employee or vendor must comply with anti-corruption, revolving door, and related laws and regulations. Otis may not provide a job, internship, or other employment-related opportunity to a government official, or a member of a government official's family, in order to gain influence with the government official. If a government official offers to give a benefit to Otis or threatens to take adverse action in connection with a hiring decision, the candidate cannot be hired.

Additional information regarding hiring and retaining current or former government officials or their relatives can be found in [CPM48C](#).

LOBBYISTS

Anti-corruption laws regulate indirect, as well as direct, payments and benefits. In some circumstances these laws can apply to conduct by third parties acting on our behalf, including lobbyists. Otis will carefully screen and select, and effectively manage, all lobbyists it engages to ensure reputable representation and compliance with company policies and applicable laws, including those prohibiting anti-competitive and corrupt practices.

Otis prohibits its lobbyists from authorizing, offering, promising, making, or otherwise facilitating in any manner, any corrupt payment by or on behalf of Otis.

Additional information regarding hiring and retaining lobbyists can be found in [CPM48D](#).

DISTRIBUTORS & NON-EMPLOYEE SALES REPRESENTATIVES

Otis will carefully screen and select, and effectively manage, all distributors and non-employee sales representatives it engages to ensure reputable representation and compliance with company policies and applicable laws, including those prohibiting anti-competitive and corrupt practices.

Otis prohibits its distributors and non-employee sales representatives from authorizing, offering, promising, making, or otherwise facilitating in any manner, any corrupt payment by or on behalf of Otis.

Additional information regarding distributors and non-employee sales representatives can be found in [CPM48E](#).

CHARITABLE DONATIONS

Otis supports worthy causes in many of the communities where we operate. Otis will make charitable donations where the funding is used for a bona fide charitable purpose and without expectation of any reciprocal benefit for Otis. No donation may be used to confer a personal benefit on an Otis employee, a government official or customer, or to obtain an improper advantage for Otis.

Otis will not make donations in cases where a government official or customer promised any benefit or made any threat in connection with the donation.

Additional information regarding charitable contributions can be found in our Charitable and Philanthropic Contributions Policy [CPM11](#).

FACILITATING PAYMENTS

Otis prohibits "facilitating payments," which are small payments made to a government official for the official's personal benefit, in order to secure or expedite a routine government action, such as obtaining a visa more quickly than usual. This prohibition does not apply to legitimate payments made directly to government agencies, such as required licensing or permitting fees.

ACQUISITIONS AND OTHER INVESTMENT TRANSACTIONS

When Otis seeks to acquire or invest in another company, our due diligence on the target company will include appropriate, risk-based anti-corruption diligence. Otis employees must consult with Legal and Compliance for specific guidance on conducting anti-corruption due diligence.

Post-acquisition integration plans will include a process for extending Otis' anti-corruption policies and procedures to any acquired company or controlled joint venture, and providing risk-based training to employees of those entities on Otis' policies and procedures.

ACCURATE BOOKS AND RECORDS

Otis will maintain accurate books and records. All company payments must be accurately recorded in Otis's corporate books, records, and accounts in a timely manner and in reasonable detail. Undisclosed or unrecorded accounts may not be established or maintained for any purpose. False, misleading, incomplete, inaccurate, or artificial entries in Otis's books and records are prohibited.

REPORTING VIOLATIONS AND ASKING QUESTIONS

Suspected violations of this Policy must be immediately reported to your manager or a member of the Legal Department or Ethics & Compliance. No retaliatory action will be taken against any employee who in good faith reports a concern about misconduct or illegal activity.

Questions about this Policy should be directed to your Legal Counsel or Ethics & Compliance Officer. When in doubt, ask or seek advice. Do not make difficult judgment calls alone. Corruption-related issues can have significant consequences for Otis and for employees who do not follow policies or make poor judgments.

The VP, Global Compliance, will review this Policy biennially.