UNITED KINGDOM MODERN SLAVERY ACT STATEMENT

This is a statement setting out the steps Carrier Rental Systems Ltd (“Carrier Rental”) has taken during the financial year ending 31 DECEMBER 2018 (the “Reporting Period”) to ensure slavery and human trafficking is not taking place in any part of its own business or supply chain.

Carrier Rental Systems is a supplier of heating, ventilation, air conditioning, pumps and power generation rental equipment.

Carrier Rental Systems is part of United Technologies Corporation which provides high-technology systems and services to the building and aerospace industries through its four business segments: Otis, Carrier (formerly known as UTC Climate, Controls & Security), Pratt & Whitney, and Collins Aerospace (a new segment comprised of the former UTC Aerospace Systems segment and the Rockwell Collins businesses following UTC’s acquisition of Rockwell Collins, Inc. in November 2018) (collectively, “UTC”).

Carrier Rental Systems is committed to ensuring slavery and human trafficking are not taking place in our business or supply chains and, to this end, took or continued to take the following actions during the Reporting Period.

UTC Code of Ethics
UTC’s Code of Ethics (the “Code”) is the foundation of our culture. First adopted in 1990, our Code sets forth values and commitments that guide ethical decision making everywhere we do business. The Code applies to UTC and its controlled entities, worldwide. Among other things, the Code includes the following statement:

UTC respects and protects human rights by:

- Ensuring safe and healthy working conditions for its employees, based on whatever is most stringent: U.S. standards, local standards, or UTC policies.
- Never using child labour or forced labour, and always seeking out business partners who share our commitment to fighting human trafficking and supporting human rights.
- Promoting responsible sourcing practices and setting expectations for our key suppliers through the UTC Supplier Code of Conduct, including that suppliers must ensure safe and healthy work environments for their employees, avoid discrimination, ensure that child labour is not used, and avoid human trafficking.

Each year, UTC requires its employees to certify they have read and will comply with the Code. Compliance with the requirements of the Code is expected behaviour for all UTC employees. Violations of these requirements will result in appropriate corrective action.

UTC Ombudsman Program
Employees and third parties (including suppliers) who observe or suspect a violation of the Code may ask a question or raise concerns in complete confidence through UTC’s Ombudsman Program. Additional information about the UTC Ombudsman Program is available here.
Internal Training
UTC made and continues to make training available to company management and employees on recognising and mitigating the risk of human trafficking and slavery in supply chains. Employees with direct responsibility for supply chain management are assigned this training during their second year in that job function.

Supply Chain Expectations
To produce superior products in a responsible manner, we need suppliers who meet high standards for business practices, environmental responsibility and operational excellence. Accordingly, our suppliers are subjected to robust selection processes and criteria including verification against government denied party lists.

UTC’s standard contract terms and conditions of purchase require suppliers to comply with all applicable laws and regulations. In addition, our standard contract terms require suppliers to adopt and comply with a code of conduct or policy statement regarding business conduct, ethics and compliance that satisfies, at a minimum, the principles set forth in the Supplier Code of Conduct (“Supplier Code”).

The Supplier Code sets forth UTC’s expectations for our suppliers, and aligns with the expectations we maintain for our own directors, officers, employees and representatives. Among other things, the Supplier Code requires suppliers to ensure child labour is not used in the performance of their work, whether or not related to UTC business. It also requires suppliers to fully comply with laws and regulations prohibiting human trafficking. This includes prohibiting the use of forced, bonded or indentured labour, involuntary prison labour, slavery, or trafficking in persons. Additionally, the Supplier Code states our suppliers will allow UTC and/or its representatives to assess their compliance, as well as the compliance of the suppliers’ business partners, with the expectations set forth in the Supplier Code in performing work for UTC, including on-site inspection of facilities. The Supplier Code is available here.

Further, UTC’s standard contract terms require suppliers to have management systems, tools and processes in place that (a) ensure compliance with applicable laws, regulations, and requirements set forth in the Supplier Code; (b) promote an awareness of and commitment to ethical business practices; (c) facilitate the timely discovery, investigation, disclosure and implementation of corrective actions for violations; and (d) provide training to employees on compliance requirements, including the expectations set forth in the Supplier Code.

In the event a supplier commits any material violation of law relating to basic working conditions and human rights in their performance of work of their subcontracts with UTC, UTC has the right to terminate those subcontracts for default.

Archie Hungwe
Managing Director - HVAC UK & Ireland
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