



Anti-Human Trafficking Policy Governing the Otis Supply Chain

A. SUMMARY

As declared in the [Otis Absolutes](#), creating a world where people connect and thrive starts with basic human rights and quality of life around the world. Otis is committed to these principals, and to reducing the risk of all forms of forced labor in its global supply chain. To that end, Otis shall maintain an Anti-Human Trafficking Program designed to detect and mitigate all forms of human trafficking and exploitation of human life in its supply chain.

B. APPLICABILITY

This Policy applies to Otis Worldwide Corporation, its regions, subsidiaries, divisions, and other controlled business entities and operations and all directors, officers, employees thereof, worldwide (collectively "Otis").

C. DEFINITIONS

- "Human trafficking" involves the use of force, fraud, or coercion to obtain labor or service, of any kind, which has not been offered voluntarily. (*ILO Forced Labour Convention, C29, 28 June 1930*)
- "Anti-human trafficking ("AHT")" means efforts to eliminate all forms of human trafficking and forced labor.
- "Anti-human trafficking program" means an organized approach and structure designed to detect, mitigate, and deter human trafficking and forced labor.
- "Supplier(s)" means any entity or individual that provides goods or services to Otis.

D. POLICY

1. Otis shall not do business with any Supplier, individual, or entity that it knows has a demonstrated or reputed inability or unwillingness to comply with the principles of the Otis Supplier Code of Conduct or applicable law—for example, laws prohibiting human trafficking, forced labor, modern slavery, and child labor, including international standards governing the [Worst Forms of Child Labor](#).
2. Otis will maintain a comprehensive anti-human trafficking program ("AHT Program"). This AHT Program will take a risk-based approach to detecting and deterring human trafficking, including but not limited to: risk-identification, assessment, mitigation, and due diligence.
3. The AHT Program will meet, and strive to exceed, the standards set forth by government agencies around the world to protect and uphold human rights including, but not limited to the:
 - California Transparency in Supply Chains Act
 - EU Non-Financial Reporting Directive
 - US Federal Acquisition Regulation
 - United Kingdom Modern Slavery Act
 - Countering Americas Adversaries Through Sanctions Act

E. RESPONSIBILITIES

The VP, Global Supply Chain is responsible for interpretation and will review this Policy every two years.

F. REFERENCES

1. [The Otis Absolutes](#)
2. [ILO Forced Labour Convention, 930 \(No. 029\)](#)
3. [ILO Minimum Age Convention, 1973 \(No. 138\)](#)
4. [ILO - Worst Forms of Child Labour Convention, 1999 \(No. 182\)](#)
5. [Otis Supplier Code of Conduct](#)