



CORPORATE POLICY MANUAL

SECTION

11

## Philanthropic Donations

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- A. SUMMARY
- B. POLICY
- C. DEFINITIONS
- D. RESPONSIBILITIES
- E. OWNERSHIP & APPROVAL
- F. REFERENCES

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## CORPORATE POLICY MANUAL

### SUMMARY

Carrier may donate funds, property, products, and services to reputable philanthropic organizations when provided openly and transparently for Philanthropic Purposes in defined Focus Areas. Donations that are unrelated to bona-fide Philanthropic Purposes, or that are offered or given in a concealed manner or to corruptly influence, are categorically prohibited because they are contrary to Carrier's core values, misappropriate company resources, and expose Carrier to significant liability under anti-corruption and related laws.

### POLICY

Carrier may make Philanthropic Donations to Eligible Recipient Organizations that align to one or more of Carrier's Focus Areas. Donations outside of the Focus Areas are discouraged. Disbursements through employee business expense reimbursement are prohibited. No donation shall be offered or made if it would constitute or create the appearance of a Corrupt Payment.

Carrier will not provide support to organizations which, in their institution or practice, discriminate against a person or group based on age, political affiliation, race, national origin, ethnicity, gender, gender identity, disability, sexual orientation, sexual belief or religion.

All Philanthropic Donations shall be approved, following the annual cycle or the out-of-cycle approval process, in accordance with [CPSW 11A: Philanthropic Donations Procedures and Standard Work](#).

### DEFINITIONS

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

**Carrier Philanthropic Donations Committee ("Philanthropic Committee")** – shall be comprised of the following Carrier executives (or their designees): CFO; Chief Marketing and Communications Officer ("CMCO"); CLO; and Executive Director, Marketing and Communications Strategy, Transformation and CSR (Chair).

**Focus Areas** – shall refer to the approved strategic categories in which Carrier will concentrate its Philanthropic Donations; Planet, People and Communities. Focus Areas are clarified in CPSW 11A.

**Business Unit (BU) and Function Philanthropic Donations Committees ("BU Committee" and "Function Committee")** – shall be appointed by the BU or Function ELT member and comprised of a marketing and communications lead (chair), a representative from finance, legal, and a VP/GM/Business Leader.



## **RESPONSIBILITIES**

CMCO and Executive Director, Marketing and Communications Strategy, Transformation and CSR, are responsible for reviewing and approving the annual Carrier donations budget and Carrier-wide implementation and administration of this Policy in accordance with CPSW 11A. Carrier Philanthropic Donations Committee is responsible for approving any singular proposed Philanthropic Donation with a value over \$250,000.

The BU and Function Philanthropic Donations Committees are responsible, together with their BU or Function ELT member, for reviewing and approving budgets for Philanthropic Donations as well as BU/Function implementation and administration of this Policy in accordance with CPSW 11A.

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.

## **OWNERSHIP AND APPROVAL**

Marketing and Communications is the owner of this Policy. CMCO, in consultation with Chief Compliance Officer, shall be responsible for interpreting this Policy and reviewing it every two years. All waivers or modifications of this Policy or procedures shall require the approval of the CMCO, Chief Compliance Officer, or authorized delegate.

## **REFERENCES**

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

CPM 1: Governance and Definitions

CPM 4: Global Ethics and Compliance Program

CPSW 11A: Philanthropic Donations Standard Work