

UNITED STATES
SECURITIES AND EXCHANGE COMMISSION

Washington, D.C. 20549

FORM SD

SPECIALIZED DISCLOSURE REPORT

UNITED TECHNOLOGIES CORPORATION

(Exact name of the registrant as specified in its charter)

Delaware

(State or other jurisdiction of incorporation or organization)

1-812

(commission file number)

06-0570975

(IRS Employer Identification No.)

10 Farm Springs Road, Farmington, CT

(Address of principal executive offices)

06032

(zip code)

Michael R. Dumais, Executive Vice President, Operations & Strategy

(Name and telephone number, including area code,
of the person to contact in connection with this report)

(860) 728-7000

Check the appropriate box to indicate the rule pursuant to which this form is being filed, and provide the period to which the information in this form applies:

Rule 13p-1 under the Securities Exchange Act (17 CFR 240.13p-1) for the reporting period from January 1 to December 31, 2018.

United Technologies Corporation and its subsidiaries' names, abbreviations thereof, logos, and product and service designators are all either the registered or unregistered trademarks or tradenames of United Technologies Corporation and its subsidiaries. Names, abbreviations of names, logos, and product and service designators of other companies are either the registered or unregistered trademarks or tradenames of their respective owners. As used herein, the terms "we," "us," "our," "the Company," or "UTC," unless the context otherwise requires, mean United Technologies Corporation and its subsidiaries. References to internet websites in this Form SD are provided for convenience only. Information available through these websites is not incorporated by reference into this Form SD.

Section 1 - Conflict Minerals Disclosure

Item 1.01 Conflict Minerals Disclosure and Report

A copy of United Technologies Corporation's ("UTC") Conflict Minerals Report for the calendar year ended December 31, 2018 is filed as Exhibit 1.01 hereto and is publicly available on UTC's website (<http://www.utc.com>) under the subheading "Financial Information" under the heading "Investors."

Item 1.02 Exhibit

The UTC Conflict Minerals Report required by Items 1.01 and 1.02 is filed as Exhibit 1.01 to this Form SD.

Section 2 - Exhibits

Item 2.01 Exhibits

Exhibit 1.01 - UTC's 2018 Conflict Minerals Report.

SIGNATURES

Pursuant to the requirements of the Securities Exchange Act of 1934, the registrant has duly caused this report to be signed on its behalf by the duly authorized undersigned.

UNITED TECHNOLOGIES CORPORATION
(Registrant)

Date: May 31, 2019

By: /s/ MICHAEL R. DUMAIS

Michael R. Dumais
Executive Vice President, Operations & Strategy

Exhibit Index

<u>Exhibit Number</u>	<u>Exhibit Description</u>
1.01	UTC's 2018 Conflict Minerals Report

UNITED TECHNOLOGIES CORPORATION

Conflict Minerals Report

For the Year Ended December 31, 2018

1. **Introduction**

United Technologies Corporation (“UTC”) has prepared this Conflict Minerals Report (the “Report”) for the calendar year ended December 31, 2018, as required by Rule 13p-1 under the Securities Exchange Act of 1934 (the “Rule”). Terms used and not defined in this Report have the meanings ascribed in Form SD, as adopted by the Securities and Exchange Commission (“SEC”) pursuant to the Rule. References in this Report to internet websites and certain of UTC’s internal policies and procedures are provided for convenience only. The referenced documents and information available through these websites are not incorporated by reference into this Report.

2. **Company Overview**

UTC manufactures and contracts to manufacture products that contain tin, tantalum, tungsten, and gold (“3TG” or “Conflict Minerals”) necessary to the functionality or production of such products (“Necessary 3TG”). Specifically, UTC provides high technology products and services to the building systems and aerospace industries worldwide. UTC’s operations for the period presented herein are classified into four segments (for purposes of this Report hereinafter referred to as “business segments”): Otis, Carrier (formerly known as UTC Climate, Controls & Security), Pratt & Whitney, and Collins Aerospace Systems (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), with each segment comprised of similar operating companies. References to each segment include the various operating companies established worldwide through which the operations of each segment are conducted.

Otis is the world’s largest elevator and escalator manufacturing, installation and service company. Otis designs, manufactures, sells and installs passenger and freight elevators as well as escalators and moving walkways. In addition to new equipment, Otis provides modernization products to upgrade elevators and escalators.

Carrier is a leading provider of heating, ventilating, air conditioning (“HVAC”), refrigeration, fire, security and building automation products, solutions, and services for commercial, government, infrastructure, and residential property applications and refrigeration and transportation applications. Carrier provides a wide range of building systems, including cooling, heating, ventilation, refrigeration, fire, flame, gas, and smoke detection, portable fire extinguishers, fire suppression, intruder alarms, access control systems, video surveillance, and building control systems.

Pratt & Whitney is among the world’s leading suppliers of aircraft engines for the commercial, military, business jet and general aviation markets. Pratt & Whitney provides fleet management services and aftermarket maintenance, repair and overhaul services. Pratt & Whitney and Pratt & Whitney Canada also produce, sell and service auxiliary power units for military and commercial aircraft.

Collins Aerospace Systems is a leading global provider of technologically advanced aerospace products and aftermarket service solutions for aircraft manufacturers, airlines, regional, business and general aviation markets, military, space and undersea

operations. Collins Aerospace Systems' product portfolio includes electric power generation, power management and distribution systems, air data and aircraft sensing systems, engine control systems, intelligence, surveillance and reconnaissance systems, engine components, environmental control systems, fire and ice detection and protection systems, propeller systems, engine nacelle systems, including thrust reversers and mounting pylons, interior and exterior aircraft lighting, aircraft seating and cargo systems, actuation systems, landing systems, including landing gear and wheels and brakes, space products and subsystems, integrated avionics systems, food and beverage preparation, storage and galley systems, and lavatory and wastewater management systems.

Additional information about UTC and our business segments is included in UTC's Annual Report on Form 10-K for the year ended December 31, 2018.

3. Supply Chain Description

UTC is a large and complex organization with thousands of globally dispersed suppliers. There are multiple tiers of suppliers between UTC's business segments and the 3TG mines. Therefore, we rely on our direct suppliers to work with their upstream suppliers to provide us with accurate information (e.g., through the reasonable country of origin inquiry described below) about the origin of 3TG contained in the materials, components, parts, subassemblies, and products contracted to be manufactured (collectively "Components") we purchase.

4. Reasonable Country of Origin Inquiry ("RCOI")

The elements of our RCOI were: (i) identification of suppliers to survey, (ii) data collection, and (iii) assessment of data to determine whether further due diligence is required.

Each business segment identified a list of suppliers to survey for purposes of the RCOI undertaken for this reporting period ("Surveyed Suppliers"). The criteria for selecting the suppliers to include in the supply chain survey varied given each business segment's unique circumstances, but generally included consideration of the likelihood of 3TG content in the Components supplied, the amount paid to suppliers believed likely to incorporate 3TG in the Components supplied, and the information technology infrastructure capabilities at the business segment. In total, for this reporting period, UTC's business segments sent 1,709 surveys to suppliers, estimated to represent over \$12 billion in spending by our business segments during 2018.

We collected information from the Surveyed Suppliers using the Conflict Minerals Reporting Template ("CMRT"), or a tool based on the CMRT. Among other inquiries, the survey contained questions regarding whether the supplier's products contain 3TG, its policy with respect to conflict-free sourcing, the supplier's due diligence process, and information about the supplier's supply chain, such as the names of the smelters or refiners that processed 3TG in the supplier's products, and the origin of 3TG used by those facilities.

Based on the RCOI undertaken for this reporting period, UTC has reason to believe that at least a portion of its Necessary 3TG may have originated from the Covered Countries, and has reason to believe that such portion of its Necessary 3TG may not be from recycled or scrap sources. Accordingly, we conducted the below described due diligence on the source and chain of custody of the Necessary 3TG in our products.

5. Due Diligence

A. Due Diligence Framework

Our due diligence measures have been designed to conform, in all material respects, with the internationally recognized due diligence framework presented by the Organisation for Economic Co-operation and Development ("OECD") in the publication

OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas: Third Edition (2016), OECD Publishing and related supplements for gold, tin, tantalum, and tungsten.

B. Due Diligence Measures Undertaken

The due diligence steps we performed are set forth below according to the five-step framework established by the OECD:

OECD Step 1: Establish Company Management Systems

Conflict Minerals Policy

UTC established a corporate policy with respect to the sourcing of Conflict Minerals. A copy of this policy is available on our website (<https://www.utc.com>) under the subheading “Doing business with UTC” under the heading “Suppliers.” Among other things, our corporate policy expresses UTC’s expectation that our suppliers will comply with the Rule and support UTC in fulfilling its obligations under the Rule. The policy also expresses UTC’s preference to source 3TG originating in any of the Covered Countries from a smelter or refiner validated as conflict-free by an independent third-party, for example through the Conflict-Free Sourcing Initiative’s (CFSI) Conflict-Free Smelter Program (“CFSP”), now known as the Responsible Mineral Initiative’s (“RMI”) Responsible Minerals Assurance Process (“RMAP”), or similar third-party programs. The policy also expresses UTC’s commitment to continue to support initiatives that enable the sourcing of conflict-free minerals. In the event we identify non-compliance with our corporate policy on the sourcing of Conflict Minerals, our business segments will attempt to work with the supplier to correct the situation. If a supplier remains non-compliant, the business segment may evaluate its options, including but not limited to reassessment of the supplier relationship.

Conflict Minerals Team

UTC established a cross-functional team to develop and implement its Conflict Minerals compliance program. The Conflict Minerals team is comprised of representatives from UTC’s Corporate Office and each business segment, with representation from functions such as supply chain management, legal, and corporate responsibility. The Conflict Minerals team is supported by a steering committee comprised of executives in supply chain management from UTC’s Corporate Office and each business segment.

Supply Chain Controls and Transparency

UTC participates in industry-wide initiatives that raise awareness for responsible sourcing of 3TG and provide resources to improve disclosures regarding the origin of 3TG in supply chains. For example, UTC is a member of the Responsible Minerals Initiative (RMI) (member code: AUTC). The flagship program of the RMI is the Responsible Minerals Assurance Process (RMAP), through which the RMI identifies smelters and refiners that produce responsibly sourced materials in an effort to prevent the extraction and trade of minerals from becoming a source of conflict. The RMI uses specially trained third-party auditors to independently verify that the identified smelters and refiners have systems in place to responsibly source minerals in conformance with the RMAP. Another RMI program is the development and publication of the Conflict Minerals Reporting Template (“CMRT”), a free, standardized reporting template that facilitates the transfer of information through the supply chain regarding 3TG country of origin as well as the smelters and refiners that process such 3TG.

Additionally, UTC is a member of the Aerospace Industries Association (“AIA”) conflict minerals working group. The AIA, on behalf of its member companies, sent a letter through the RMI to smelters not yet participating in the RMAP. The letter urged these smelters to conduct due diligence on the origin of 3TG in their supply chains, and to become validated as conformant with the CFSP (now known as the RMAP) or validated as conflict-free under a similar program.

Supplier Engagement and Training

To communicate our expectations regarding the responsible sourcing of conflict minerals, UTC posted on our website our position statement on Conflict Minerals referenced above. We provided the Surveyed Suppliers with a message from UTC leadership about the Rule and our expectations of how our suppliers will help us to comply with this law. UTC developed and made available to the Surveyed Suppliers a web-based training presentation on topics including the requirements of the Rule, our obligations under the Rule, instructions for responding to our survey, and an e-mail address for assistance in interpreting and completing our business segments' survey.

We advised Surveyed Suppliers that we do not discourage the sourcing of 3TG from the Covered Countries; rather, we encourage our suppliers to source such 3TG from a smelter or refiner verified as compliant with the Conflict-Free Smelter Program (now known as the Responsible Minerals Assurance Process) or a similar program. We also asked Surveyed Suppliers, to the extent they believed the products delivered to UTC's business segments may have contained 3TG originating from one of the Covered Countries, to provide 3TG information specific to such products (i.e., a "product-level" CMRT declaration).

The language in our standard contract terms and conditions of purchase for the negotiation of new and renewal contracts requires our suppliers to comply with the RCOI and due diligence requirements of the Rule, except that suppliers who are not SEC registrants are not required to comply with the Rule's filing requirements.

Internal Training

UTC developed training and reference materials for its employees about Conflict Minerals, including a training module summarizing the relevant requirements of the Rule, UTC's obligations under the Rule, and the processes UTC designed to evaluate and respond to the risk, if any, of Necessary 3TG in its supply chain that directly or indirectly financed or benefited armed groups in the Covered Countries.

Maintain Records

UTC has adopted a policy to retain relevant documentation.

Grievance Mechanism

General questions regarding UTC's conflict minerals compliance program can be directed to UTC's Corporate Responsibility Manager at cminfo@utc.com. Employees or third parties may report any concerns about or violations of UTC's corporate policy with respect to the sourcing of Conflict Minerals via UTC's Ombudsman/DIALOG Program. Additional information regarding UTC's Ombudsman/ DIALOG Program is available through the "Our Company" section of our website (<http://www.utc.com>) under the heading "Ethics and Compliance."

OECD Step 2: Identify and Assess Risks in the Supply Chain

Our business segments conducted a supply chain survey using the Conflict Minerals Reporting Template ("CMRT"), or a tool based on the CMRT, to investigate the origin of Necessary 3TG in our products.

Suppliers who did not respond to our business segments' survey received multiple reminders to submit their survey responses. In addition, business segment representatives, members of the UTC Conflict Minerals team, and colleagues, such as account executives, asked contacts at non-responsive suppliers for their assistance in resolving overdue survey responses.

Members of the UTC Conflict Minerals team or business segment representatives reviewed the Surveyed Suppliers' responses against an established set of criteria to determine whether further engagement was necessary. For example, if a supplier advised

it supplied Components containing 3TG from any of the Covered Countries, our business segments or their representatives compared the smelters and refiners identified in a supplier's survey response against the Responsible Minerals Initiative's (RMI) published list of facilities that are conformant with the Responsible Minerals Assurance Process (RMAP) assessment protocols.

OECD Step 3: Design and Implement a Strategy to Respond to Risks

UTC designed and implemented a risk management plan to evaluate and respond to risks identified in our supply chain. In the event we identify non-compliance with our corporate policy on the sourcing of Conflict Minerals, our business segments will attempt to work with the supplier to correct the situation. A supplier's failure to take corrective actions when required may lead to additional actions, including but not limited to reassessment of the supplier relationship. Risk assessment findings based on the supply chain survey and due diligence conducted were reported to senior management.

OECD Step 4: Carry out Independent Third Party Audit of Smelter's and Refiner's Due Diligence Practices

We support audits of smelters and refiners through our participation in and financial support of the RMI. The RMI's flagship program is the RMAP, which uses independent third-party auditors to identify smelters and refiners that have systems in place to produce responsibly sourced materials. We do not perform direct audits of these entities within our supply chain.

OECD Step 5: Report Annually on Supply Chain Due Diligence

A copy of this Report and UTC's associated Form SD are available free of charge on our website (<http://www.utc.com>) under the subheading "Financial Information" under the heading "Investors."

6. Efforts to Determine Mine or Country of Origin

Our supply chain survey included questions that asked the Surveyed Suppliers for the name of the smelter(s) in their supply chain, the name of the mine(s), and the location of the mine(s) from where 3TG in their supply chain originated. The cover letter for our supply chain survey instructed suppliers, to the extent they had determined the products delivered to UTC's business segments contained 3TG originating from one of the Covered Countries, to provide a "product-level" declaration with information specific to such products (e.g., the name of the mine, country of origin, and/or the name of the smelter or refiner who processed 3TG in such products).

7. RCOI and Due Diligence Results

A. Survey Responses

We rely on our suppliers to provide information on the origin of 3TG contained in the Components purchased by our business segments. These suppliers are similarly reliant upon information provided by their suppliers.

In total, UTC's business segments sent 1,709 surveys to suppliers, estimated to represent over \$12 billion in spending by our business segments during 2018. Of the 1,709 surveys sent, we received 1,572 completed surveys, representing a response rate of 92%.

The responses we received from Surveyed Suppliers collectively identified 320 unique facilities identified by the Responsible Minerals Initiative (RMI), of which 255 or approximately 80% are validated as conformant with the Responsible Minerals Assurance Program (RMAP).

We identified 280 survey responses where a supplier declared it sourced 3TG from one of the Covered Countries. Based on our review of these survey responses and the due diligence measures described above, we have reason to believe some of our

suppliers sourced 3TG used in Components supplied to our business segments from the smelters listed on Schedule A. We determined these smelters may have sourced such 3TG from the countries of origin listed on Schedule B attached hereto. Each smelter identified on Schedule A was included on the RMI Conformant Smelter & Refiner List.

With respect to the other survey responses, despite the due diligence we have undertaken for this reporting period, we were unable to link such 3TG from the Covered Countries to the Components supplied to our business segments. We were unable to do so because the information provided was generally at a supplier-company level that described the supplier's overall potential 3TG sourcing. Of the remaining survey responses providing smelter information, the suppliers were unable to verify whether 3TG from those smelters was used in the Components supplied to one of our business segments. For this reason, with the exception of the smelters described above, we have been unable to identify with confidence the specific facilities used to process Necessary 3TG in our products, the country of origin, or the mine or location of origin of the Necessary 3TG in our products.

B. Continuous Improvement Efforts to Mitigate Risk

Since December 31, 2018, UTC has taken, or intends to take the following steps to improve the due diligence conducted to further mitigate risks that the Necessary 3TG used in our products could benefit armed groups in the Covered Countries. As part of our regularly scheduled compliance program activities, we intend to:

- Direct suppliers to our corporate policy with respect to the sourcing of Conflict Minerals;
- Encourage suppliers who source 3TG from one of the Covered Countries to do so from smelter(s) or refiner(s) validated as conformant with the Responsible Minerals Assurance Process (RMAP, formerly known as the Conflict-Free Smelter Program) or a similar conflict-free program;
- Identify and follow-up with suppliers who do not respond to our supply chain survey in an effort to increase our survey response rate and obtain additional information about the sourcing of 3TG in our supply chain; and
- Participate in trade association and/or industry-wide initiatives to define and improve best practices for conducting due diligence on supply chains containing 3TG and/or that support the development of conflict-free supply chains.

Cautionary Note Concerning Forward-Looking Statements

This Report contains statements which, to the extent they are not statements of historical or present fact, constitute "forward-looking statements" under the securities laws. These forward-looking statements are intended to provide management's current expectations or plans for our future business practices and performance, based on assumptions currently believed to be valid. Forward-looking statements can be identified by the use of words such as "believe," "expect," "expectations," "plans," "intends," "strategy," "estimate," "project," "target," "anticipate," "will," "should," "see," "guidance," "confident" and other words of similar meaning in connection with a discussion of future performance. Forward-looking statements may include, among other things, statements relating to future supply management practices, policies and plans for procurement of materials, risk management practices, supply chain infrastructure and efforts to improve supply chain transparency. All forward-looking statements involve risks, uncertainties and other factors that may cause actual results to differ materially from those expressed or implied in the forward-looking statements. For those statements, we claim the protection of the safe harbor for forward-looking statements contained in the U.S. Private Securities Litigation Reform Act of 1995. Such risks, uncertainties and other factors include, without limitation, the ability of the Company, its suppliers, industry groups and supplier organizations to

obtain reliable information as to the source of purchased production materials; the timing for the development of infrastructure allowing such information to be compiled and shared with others in a cost effective and efficient manner; the impact of changes in laws and regulations, and the interpretation thereof, and in political conditions; the impact of restructuring activities and the reorganizations of our operations; the impact of acquisitions, divestitures, joint ventures and other transactions; and other factors beyond our control. The forward-looking statements speak only as of the date of this Report and we undertake no obligation to publicly update or revise any forward-looking statements, whether as a result of new information, future events or otherwise, except as required by applicable law.

Schedule A to

Conflict Minerals Report

<u>Metal</u>	<u>Smelter or Refiner Name</u>	<u>RMI ID*</u>	<u>Smelter or Refiner Location</u>
Gold	Asahi Refining Canada Ltd.	CID000924	Brampton, Ontario, Canada
Gold	Heraeus Metals Hong Kong Ltd.	CID000707	Fanling, Hong Kong, China
Gold	Kennecott Utah Copper LLC	CID000969	Magna, Utah, U.S.A.
Gold	Metalor USA Refining Corporation	CID001157	North Attleboro, Massachusetts, U.S.A.
Gold	Metalurgica Met-Mex Penoles S.A. De C.V.	CID001161	Torreón, Mexico
Gold	Royal Canadian Mint	CID001534	Ottawa, Ontario, Canada
Gold	Umicore Brasil Ltda.	CID001977	Guarulhos, São Paulo, Brazil
Tin	Malaysia Smelting Corporation	CID001105	Butterworth, Penang, Malaysia
Tin	Metallo Spain S.L.U.	CID002774	Berango, Spain
Tin	Metallo Belgium N.V.	CID002773	Beerse, Belgium
Tin	Thaisarco	CID001898	Amphur Muang, Phuket, Thailand

* Each smelter or refiner identified above was included on the RMI Conformant Smelters & Refiners List.

Schedule B to

Conflict Minerals Report

Possible Countries of Origin

Argentina, Armenia, Australia, Azerbaijan, Bolivia (Plurinational State of), Botswana, Brazil, Burkina Faso, Burundi, Canada, Chile, China, Colombia, Cyprus, Democratic Republic of the Congo, Dominican Republic, Ecuador, Egypt, Ethiopia, Finland, Georgia, Ghana, Guatemala, Guinea, Guyana, Honduras, Indonesia, Iran, Ivory Coast, Kazakhstan, Kenya, Kyrgyzstan, Laos, Lebanon, Malaysia, Mali, Mauritius, Mexico, Mongolia, Morocco, Myanmar, Namibia, Nicaragua, Niger, Nigeria, Papua New Guinea, Peru, Philippines, Portugal, Puerto Rico, Russian Federation, Rwanda, Saudi Arabia, Senegal, Slovakia, Solomon Islands, Spain, South Africa, Suriname, Sweden, Taiwan, Tanzania, Thailand, Turkey, United Kingdom of Great Britain and Northern Ireland, Uganda, Uruguay, United States of America, Uzbekistan, Venezuela, Zambia, Zimbabwe