



CODE OF BUSINESS CONDUCT

ENTER

Honeywell

THE POWER OF **CONNECTED**

Letter from Our Chairman and CEO



Dear Colleague:

As Honeywell continues to grow, we must stay focused on our commitment to integrity and compliance, respect, diversity, and inclusion. Our Code of Business Conduct is a roadmap to help you navigate the operating environments in our businesses, which include some of the most dynamic sectors of the global connected economy.

We have a great portfolio, strong processes, and the right people to succeed. We have a responsibility to conduct ourselves with the highest levels of integrity in every aspect of everything we do. Our integrity helps ensure that we continue to sustain the credibility of our brand, maintain our strong reputation, and build on our track record of growth and performance.

Take the time to read through Honeywell's Code and understand the guidance. If you have any questions about our Code, or need help understanding how it applies to the work you do, seek advice from any of the resources listed. Our Company will never tolerate retaliation against anyone for asking questions or raising concerns in good faith, so you should always feel comfortable coming forward. It also is our expectation that if you observe any of your colleagues not following the Code, you should report your concerns immediately through one of the reporting channels.

I'm counting on you to uphold our continued commitment to integrity and ethics at Honeywell.

A handwritten signature in black ink that reads "Darius". The signature is stylized and fluid.

Darius Adamczyk

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Honeywell's **8 Behaviors**

Honeywell expects all employees to act with integrity and to comply fully with the Code of Business Conduct. Our commitment to integrity and ethics, respect, and diversity and inclusion are fundamental expectations of working at Honeywell. While we don't expect employees to exhibit perfection, at all times, in all 8 Behaviors, no one can ever fail to demonstrate respect or integrity, or fail to support diversity and inclusion. Acting with integrity is a competitive advantage for the Company, and we should all take pride in our strong commitment to achieving business results the right way.

Have a Passion for Winning

Understand and beat the competition. Never give up in the face of resistance and setbacks. Have fearless accountability for getting results. Be consumed with making things better and have an insatiable curiosity for learning.

Be a Zealot for Growth

Solve problems and see the world through the customer's eyes. Promote confidence and trust. Aggressively focus on new opportunities and obsess over growth. Understand what creates value for customers. Promote a customer-centric organization that has a deep understanding of the needs of our customers.

Think Big ... Then Make It Happen

Dream of the possibilities instead of limitations. Be willing to re-examine almost anything. Innovate with agility, iterate, test, try, take risks. Translate the best ideas into realistic, pragmatic, executable plans.

Act with Urgency

Act quickly when faced with ambiguity. Get the facts that you can, think, and then move with lightning speed. Use speed as a differentiator. Never put off until tomorrow what you can do today.

Be Courageous

Take bold action on what you believe is right. Confront problems directly and face adversity head on. Be comfortable being unpopular when required and press on. Take on seemingly impossible goals and work out of your comfort zone.

Go Beyond

Over deliver on commitments. Be committed to putting in your maximum work effort and always do what you say. Be the someone people trust to get things done and deliver.

Inspire Greatness

Empower, develop, and set high expectations of direct reports, peers, and others. Bring others with you, achieve things you never thought possible, and celebrate your wins.

Become Your Best

Seek and accept feedback wherever you can get it, decide what to change, and go for it. Be curious, and be confident and humble. Read others' reactions, and adjust as you go. Bounce back from disappointments.

Introduction to Our Code

What Honeywell Expects from Each of Us

Our Company's growth starts with each of us – we are key to our Company's character and central to its leadership and success.



The Honeywell Code of Business Conduct (our “Code”) is designed to provide guidance to each of us regarding Honeywell’s standards of integrity and compliance in all of our business dealings. Our Code is an integral element of the Honeywell Behaviors. It describes the basic rules of conduct that we, as One Honeywell, are expected to follow. In addition, it provides helpful resources in the event we have a question or concern about proper conduct.

Our Code defines what Honeywell expects from each of us and how we treat:



Who Must Follow Our Code

Our Code applies to all employees, officers and directors of Honeywell. Where appropriate, business partners working on our Company's behalf should also familiarize themselves with and follow our Code. If your job responsibilities require you to interact with representatives working on behalf of Honeywell, be sure to inform them of their responsibility to act in accordance with this Code and provide them with a copy. Their behavior must be consistent with our Code, other Honeywell policies, and applicable laws and regulations.

Our Shared Obligations

We all have a personal obligation to know and follow the Code, as well as other Company policies, procedures, and guidelines that apply to our job responsibilities at Honeywell. Many of these are cited in the appropriate section of the Code. Others can be found in the *Honeywell Policy Manual*. We must never ignore or seek to circumvent the Code for any reason. If you need help understanding our Code or a specific policy, procedure, or guideline, or how they apply to your scope of responsibilities, seek guidance from any resource listed in "Asking for Advice and Voicing Concerns."

Additional Obligations for Managers and Supervisors

Honeywell managers and supervisors have a special duty to foster a culture of integrity and compliance. This means that managers and supervisors should serve as role models for integrity and compliance, respect, and diversity and inclusion in all their interactions. It also means that managers and supervisors should ensure that colleagues who report to them feel comfortable raising questions and concerns without fear of retaliation, that any concerns or questions will be addressed in a professional and timely manner, and that we will not compromise our standards of integrity and compliance to obtain business results.

Managers and supervisors should also consider the character and behavior of colleagues whom they are considering for promotion. Promotions are a privilege only extended to those who exemplify Honeywell's Eight Behaviors and values in a manner consistent with this Code.

Complying with the Law

Although our Code addresses some of the common challenges that multinational companies like Honeywell face, it cannot address every situation that may arise in our workplace. When in doubt as to whether an activity is proper, you should seek guidance through one of the avenues discussed in “Asking for Advice and Voicing Concerns.”

Laws and regulations are complex and subject to change, and they often vary from country to country. Company policies may also be subject to change, and may vary greatly depending on the country in which we are operating. For these reasons, we must take care to familiarize ourselves with the policies, procedures and laws that apply to our particular job functions and locations in which we operate. If a local law conflicts with our Code, comply with local law. If a local custom or practice conflicts with our Code, comply with the Code.

Your business or region may have policies and practices that require more from you than required by this Code. The same may be true of local law. In all such instances, you must follow the stricter policy, practice, or law. If you have any doubts about the lawfulness or appropriateness of a proposed action, seek advice by following the steps set out in “Asking for Advice and Voicing Concerns.”

This Code is intended to be consistent with and refer to certain key Corporate policies, which are included in the Honeywell Policy Manual. The Honeywell Policy Manual may provide greater detail than is provided by this Code. In some instances, the Policy Manual may provide additional policies not covered by this Code. The *Honeywell Policy Manual* is located on the Honeywell Intranet.

It is important to note that our employment rights are governed by the laws of the countries in which we do business, as well as the rules in place in the locations where we work. Our Code attempts to clarify Honeywell’s rights and expectations as an employer, but does not create any contractual employment rights for employees.

In the United States and other countries, employment by Honeywell is considered “at-will.” This means that you have the right to terminate your employment at any time and for any reason, and Honeywell may exercise the same right, consistent with applicable laws. If local laws differ from the provisions of this Code, follow the laws of the country in which you work.

Asking for Advice and Voicing Concerns

While working on behalf of Honeywell, you may face difficult situations. Many times your common sense, good judgment, our Code, and Company policies and procedures will be enough to guide you. However, there may be times in which you need additional help to make the right choice. In these cases, you have several resources available to you. These include:

- Your manager or supervisor
- Your Human Resource representative
- Your Integrity and Compliance Representatives (I&C Reps) and Ethics Ambassadors
- A member of the Law Department or Global Security
- A member of the Integrity and Compliance Office
- Local Honeywell formal complaint, grievance processes
- ACCESS Integrity and Compliance Helpline

The ACCESS Integrity Helpline is a 24-hour service. It is answered by an independent third-party provider that accommodates all of the languages that Honeywell employees speak. You may make a report using the helpline by dialing:

800-237-5982, or refer to the Integrity and Compliance website at <http://go.honeywell.com/AccessIntegrityHelpline> for a listing of additional country-specific helpline numbers

You may also report issues by mail or email to:

Honeywell International Inc.
Attention: ACCESS Helpline
115 Tabor Road
Morris Plains, New Jersey 07950

access.integrity.helpline@honeywell.com

If you become aware of a situation that may involve a violation of this Code, Company policy or any applicable law, or regulation, you have a responsibility to report it. Please note that failure to comply with our Code and Company policies can have serious consequences. Consequences may include disciplinary action, up to and including termination, as well as possible civil or criminal penalties.

Honeywell will treat all reports confidentially to the extent possible, consistent with the law, Company policy, and the Company's need to conduct a thorough investigation. Suspected violations may be reported by identifying yourself or by remaining anonymous. In Europe, specific processes have been implemented to comply with rules that limit anonymous reporting. You may contact the Integrity and Compliance Office with any questions.

All reports will be investigated promptly and thoroughly, consistent with applicable law and, upon the advice and approval of the Law Department, may be reported to the appropriate authorities. Employees have a duty to cooperate with Company investigations concerning potential violations of the Code or applicable Company policies. Failure to cooperate fully in a Company investigation or the failure to be fully truthful when providing evidence or testimony in such investigation is grounds for disciplinary action, including termination. It should be emphasized that appropriate corrective or disciplinary action for Code violations will be taken whenever necessary.

Honeywell Will Not Tolerate Retaliation

It is important that you feel comfortable raising your questions and concerns. Honeywell will not tolerate any form of retaliation against you for making a good faith report of actual or potential misconduct. Making a report in "good faith" means your report is honest, sincere, and complete to the best of your knowledge.

If you feel an act of retaliation has occurred, you should report your concerns via one of the methods outlined in "Asking for Advice and Voicing Concerns."



One Honeywell

How We Treat Each Other

Promoting a positive work environment based on mutual respect and a commitment to health and safety is the key to maintaining the best possible workforce and to providing growth opportunities for our stakeholders.

Our Company recognizes and rewards individual talents by providing competitive compensation and benefits. We also promote development through training that broadens work-related skills.

Honeywell is committed to maintaining an inclusive, safe, and respectful working environment for all employees, regardless of gender, race, color, ethnic background, age, religious belief, national origin, affectional or sexual orientation, gender identity, disability, marital status, veteran status, citizenship or impending citizenship, or any other characteristic protected by law. Employees should be able to work and learn in a safe, yet stimulating atmosphere and Honeywell will not tolerate intimidating, hostile, abusive, or offensive behaviors in our workplace. Such conduct will be considered harassment and is strictly prohibited.

Respecting Each Other and Promoting a Positive Workplace

Honeywell respects and values the diversity reflected in our various backgrounds, experiences, and ideas. Together, we provide an inclusive work environment that fosters respect for all coworkers, clients, and business partners. Our workplace is one that reflects the diversity of the communities in which we operate and we are committed to providing employees with a workplace that is free from unlawful discrimination, harassment, or personal behavior that is not conducive to a productive work climate. This pledge applies to all phases of the employment relationship, including hiring, promotion, demotion, transfer, discipline, layoff or termination, compensation, use of facilities, and selection for training or related programs.

At Honeywell, we are committed to treating people with respect and fostering a workplace that champions diversity and inclusion. Our people are our ultimate differentiator and having employees with diverse backgrounds, perspectives, experiences, and cultures brings a diversity of ideas that supports a high-performing environment. If you know or suspect that unlawful or inappropriate discrimination or harassment has occurred, you should report the situation immediately via one of the reporting channels described in “Asking for Advice and Voicing Concerns.”

For more information, see our *Workplace Harassment*, *Equal Employment Opportunity*, and *Employees and Applicants with Disabilities* policies, as well as our *Covered Veterans Statement*.

Protecting Personal Data

At Honeywell, we are committed to promoting a work environment and operating our businesses in a manner that fosters confidence and trust. To accomplish this goal, we must properly manage the personal data provided to us by our colleagues, customers, suppliers, and others. *“Personal data” is any information relating directly or indirectly to an identified or identifiable natural person. Examples of personal data include: name, home address, personal email address and phone number, business contact details, HR records, employee identification number, geo-location data, log-in credentials, or online identifiers such as an IP address.*

We should only collect, access, use, or disclose personal data for appropriate business purposes. In addition, we should use the minimum amount of personal data needed to accomplish a task. We must not share personal data with anyone, either inside or outside our Company, who does not have a business need to know it. Further, we must take steps to properly secure personal data at all times.

Company policies, practices, and training programs are designed to assure that only authorized personnel access personal data. If you believe that personal data has been subjected to unauthorized disclosure, use, access, destruction, or acquisition, you must contact the Law Department’s Data Privacy Function immediately. Failure to do so could subject our Company to fines and/or regulatory action.

When processing personal data, Honeywell complies with applicable law as well as Company policies. For more information, see our *Data Privacy Policy*, our *Acceptable Use of Information Resources Policy*, and the *Information Classification & Handling Policy*.



Q: Tom, an engineer, has requested a report containing the dates of birth and addresses of each co-worker in his department so that he can send them birthday greetings. Should Tom be provided with the requested information?

A: No. Personal data may be shared and used only for appropriate business purposes, and sending personal correspondence to co-workers at their homes is not considered an appropriate **business** purpose.

Q: Mary, a Payroll manager, is working on a spreadsheet that contains the Social Security numbers of Honeywell employees. Her company-issued laptop is being repaired and she would like to finish her work at home. May Mary send the spreadsheet to her personal e-mail account so that she can access the file from her personal computer?

A: No. Social Security numbers and other national identifiers constitute a special category of personal data called “sensitive identification data,” which must always be encrypted and may only be used when absolutely necessary, such as for tax purposes. Mary cannot send files containing sensitive identification data or any other personal data to a personal e-mail account. Mary should use an authorized network and computer device in order to work from home.

Q: Mary, an HR professional with Peoplesoft access, received a request to provide a file containing employee personal data to an external vendor for purposes of providing insurance benefits. Should Mary send the file?

A: Mary should send the file only after verifying that the vendor has an appropriate data privacy agreement in place with Honeywell. In addition, Mary should ensure that she only provides the minimum data required and that the file is transmitted to the vendor using a Honeywell IT approved secure transfer method.



Substance Abuse

Substance abuse limits our ability to do our work safely, which puts us all in jeopardy. For this reason, we may never work on behalf of Honeywell while under the influence of alcohol, illegal drugs, misused prescription drugs or over-the-counter medications. This applies whenever you are performing services for, or on behalf of, Honeywell, even if the use occurs after hours or off Company premises. In addition, we may never use, possess, transfer or sell illegal drugs, or alcohol, or misuse prescription drugs or over-the-counter medications, during working hours or while on Company premises. Our Company makes an exception to this rule when alcohol is transferred in a sealed container for authorized gift purposes or is used in moderation at an authorized Company event.

For more information, see our *Alcohol and Drugs in the Workplace Policy*.

A Violence-Free Workplace

We work to prevent any acts or threats of violence in our workplace as part of our commitment to health and safety. Individuals who engage in violence or threats of violence may be subject to disciplinary action, up to and including termination of employment, as well as possible criminal prosecution. You should report all threats and acts of violence to your supervisor, local Human Resources representative, or Global Security immediately. If you feel that someone is in immediate danger, you may also contact the local authorities.

For more information, see our *Violence Prevention Policy*.

Providing a Healthy and Safe Workplace

By integrating health, safety, and environmental considerations into all aspects of our business through the Honeywell Operating System (HOS), we protect our people and the environment, achieve sustainable growth and accelerated productivity, drive compliance with all applicable regulations, and develop the technologies that expand the sustainable capacity of our world. Our Health, Safety, and Environment, Product Stewardship, and Sustainability (HSEPS) Management System reflects our values and help us meet our business objectives. Adherence to our HOS-based management system helps ensure that our employees, communities, and environment remain safe. If we believe that conditions are in any way unsafe, we must stop work immediately. Refer to the section on “Protecting the Environment” for more information.

We must make sure that our facilities are secure at all times. This means we allow only authorized individuals access to our worksites. If you believe that someone is attempting to improperly access a Honeywell facility, contact Honeywell Global Security.



Q. Rosalie has been working on a machining line for three years without any injuries. Her work requires her to wear safety glasses, but she has a hard time finding glasses that fit her perfectly. Since she has not had an accident in three years, can she decide to stop wearing her safety glasses?

A. No, but there are actions she should take. Our HSEPS Management System identifies potential risks and requirements and establishes programs – such as providing safety glasses – to manage those risks. Like all Honeywell programs, HSEPS programs are subject to continuous improvement through the Kaizen process. Rosalie should continue to wear her safety glasses, but she should use her site’s Kaizen process to suggest an improvement, such as working with the vendor to procure better-fitting glasses.

Q. Qiang is responsible for collecting gloves used for handling hazardous chemicals and disposing of them in the legally-required waste container, which is on the other side of the manufacturing floor. When a large contract needs to be filled quickly by the factory, the Plant Manager asks all employees to work safely but quickly to stay on schedule. Regular trash cans are located directly next to Qiang’s work station. In order to help his co-workers fill the contract order, can Qiang dispose of the gloves used to handle hazardous chemicals in the regular trash cans?

A. No, but there are actions he should take. As part of assessing the potential risks and requirements at a facility, Honeywell’s HOS-based management system looks at the legal requirements applicable to the facility’s operations and establishes programs to ensure those legal requirements are met. Honeywell complies with all laws, including HSEPS laws, everywhere it operates, so Qiang must continue following the prescribed waste disposal practices. However, he should raise through his facility’s Kaizen (continuous improvement) process the opportunity to use Lean principles to reduce the transportation time for the soiled gloves by locating permissible waste disposal containers closer to his work station.



One Honeywell

How We Act in the Best Interest of Our Company

We should conduct Honeywell business free from outside influences or personal biases, and make business decisions based on the best interests of Honeywell.



Avoiding Conflicts of Interest

As part of our duty to uphold our Company's reputation, we must avoid improper conflicts of interest. A "conflict of interest" occurs when our personal interests interfere with, or appear to interfere with, our ability to perform our jobs without bias. We may not engage in any interest, investment or association in which a conflict of interest might arise. If you have a potential or actual conflict of interest, you must disclose it by speaking with your supervisor or by contacting the Law Department or the Honeywell Integrity and Compliance Office. Conflicts of interest are often easily avoided if disclosed in advance.

The following sections describe situations that may create conflicts of interest. It is important to remember that conflicts may also be created when a member of your household or immediate family is the individual involved.

I Gifts and Business Entertainment

Developing strong working relationships with our customers, suppliers, and other business partners is important to our growth. Business gifts and entertainment are sometimes used to strengthen these bonds. However, we must exercise particular caution when offering or accepting business courtesies. Exchanging gifts and entertainment can result in conflicts of interests. If not handled properly, they also may lead to the appearance of improper payments, kickbacks or corruption. You may not accept or provide any gift, favor or entertainment if it is made for an improper purpose, or if you know it would violate our policies, the law or the gift policy of the recipient's company.

Generally, we can offer or accept a gift, favor, or entertainment, as long as it:

- Does not make the recipient feel obligated or give the appearance of an obligation
- Does not exceed generally accepted local business practices
- Is of nominal value
- Cannot be construed as a bribe or payoff
- Does not violate applicable law, Company policies, or the policies of the recipient's company
- Is not solicited

These rules do not apply to unsolicited promotional materials of a general advertising nature, such as imprinted pencils, memo pads, and calendars, so long as what is given does not create or appear to create any obligation. Additionally, in keeping with national custom, ceremonial presentations may be permitted as long as what is accepted is not in violation of any law, cannot be viewed as a bribe, and would not embarrass you or Honeywell if disclosed.

Gifts should not be accepted from suppliers or potential suppliers (or other business partners or potential business partners) during or in connection with contract negotiations with the supplier. In addition, we should avoid soliciting gifts from suppliers or other business partners for Honeywell functions or employee awards.

If you are unsure whether you should offer or accept a business gift or entertainment, you should seek guidance. Customer entertainment and gifts must be discussed in advance with your supervisor.

Stricter laws govern gifts offered or made to government officials. These laws apply not only to government officials, but also to employees of state-owned or state-controlled companies. You must comply strictly with these laws and regulations. Never offer or accept a business courtesy if doing so violates a law or regulation, will cause embarrassment for Honeywell, or will reflect negatively on the Company's reputation. For more information, see the "No Commercial Bribery and No Improper Payments to Government Officials" section of our Code and our policies on *Business Courtesies for U.S. Government Officials*, *Government Relations*, and *Anticorruption*. If you have any questions or concerns please consult the Law Department.



Q: At an offsite meeting, a vendor who has been providing services to Honeywell for several months invites Denisha to lunch. She accepts, allowing the vendor to pay for the meal. Are her actions acceptable?

A: Occasional meals and nominal gifts are ordinarily acceptable, so long as they don't raise a question about Denisha's objectivity. Customer entertainment and gifts should be discussed in advance with your supervisor. The supervisor should evaluate the business purpose for the meal, the setting and the cost of the meal, and the frequency of the vendor's invitations.

Q: Anna is planning a VIP event for customers, both private and government, where meals and gifts will be provided to the attendees. Local laws restrict the value of gifts and hospitality to some government officials, which means that some attendees cannot receive the meals and/or gifts. Anna thinks it would be disrespectful to the guests if some did not receive the gift, so she wants to proceed with giving all attendees the same gifts. What should Anna do?

A: In general, Honeywell employees can provide gifts and hospitality in accordance with Honeywell's policies and applicable laws. In this case, there are legal restrictions on the value of gifts and hospitalities to certain government officials with which Honeywell must comply. Anna should reach out to the Global Integrity & Compliance Department for guidance and approval before proceeding with the event and should not disregard the local law restrictions.



I Financial Interests

As Honeywell employees, we generally should avoid doing business with any company in which we have a personal financial interest. There may be situations where our personal financial interest in a company with which Honeywell does business is permissible. However, such situations should be reviewed by the Law Department or the Integrity and Compliance Office to determine the best course of action.


In addition, you may not purchase or maintain a significant financial interest in a customer, competitor, or business partner that does business with, or potentially does business with Honeywell, unless you receive approval from the Law Department. Always ensure you are able to make business decisions with Honeywell's best interests in mind.

Q: Artie has been asked to be on the board of a local non-profit organization that helps to recycle and refurbish used computers and electronics for the benefit of disadvantaged youth. There is no overlap between what this organization does and Honeywell's business, and Artie's commitment as a board member would be to attend meetings (outside of Honeywell office hours), review business plans, and discuss strategy. Can Artie be a board member?

A: Yes. Although this does not appear to present a conflict of interest with Artie's responsibilities to Honeywell, Artie should still first disclose this to his manager, HR, and/or the Global Integrity and Compliance team and get prior approval before accepting the board position. In addition, Artie should ensure that these activities take place outside of Honeywell working hours and do not interfere with his Honeywell work. See the Company's Outside Organization Service Policy.

I Outside Employment

From time to time, you may wish to engage in work outside our Company. In doing so, you must ensure that any outside employment does not create a conflict of interest. We must never use Honeywell tangible and intangible property, including documents, Information Technology assets, facilities, and intellectual property to conduct non-Honeywell business.




Q: John is a communications manager and in the evenings and weekends works as a football coach at a community college. It is end of the football season and John is eager for his team to make it to the finals. He is under a tight deadline at work so he is wondering if he can ask his direct reports to help him plan for the upcoming game's logistics. Can John get support from his direct reports for his after-work football job?

A: No. Asking his direct reports to help him with his after-work football job is an inappropriate use of Honeywell resources and creates a conflict of interest. Note that in this situation John should advise his supervisor that he is engaged in his additional coaching activities outside of Honeywell working hours and refrain from using Honeywell resources to support that work.



I Business with Friends and Family Members

Business relationships with family members and friends can result in a conflict of interest, or the appearance of a conflict. For this reason, you should never be involved with or attempt to influence the bidding, negotiating, or contracting process between yourself, a family member, or a close friend and Honeywell. This rule applies even in indirect situations where you, your family member or close friend owns or works on behalf of another company with which Honeywell does, or is considering doing, business.



Q: Sam works in Procurement and would like place an order for Honeywell parts with his cousin's distribution company. Can Sam procure the Honeywell parts from his cousin's company?

A: Sam should disclose his relationship to his cousin's company to his supervisor and recuse himself from any procurements involving family members or close friends. His cousin's company could be qualified to compete for Honeywell business if it qualifies under Honeywell's standard procurement practices, Sam is recused from the procurement decision, and the procurement is arm's length and follows the normal, standard procurement rules that apply to all suppliers.

I Improper Reporting Relationships

We need to avoid improper reporting relationships. They can lead to potential legal exposure for the Company and perceptions of favoritism and preferential treatment among the colleagues of those involved, invariably leading to an unhealthy workplace environment. Accordingly, we may not directly or indirectly supervise, or work under the supervision of, a family member or someone with whom we have a close personal relationship, whether that relationship is sexual or otherwise.



Q: Salma is short-staffed at the moment and needs to hire someone as soon as possible. At a family picnic, Salma's cousin mentions that she is looking for a job. Salma asks her cousin to apply for the position as soon as possible.

A: This could create a conflict of interest or could give the appearance of a conflict of interest if Salma's cousin reported to her. While there is no general prohibition on family members working at Honeywell, Salma should disclose her family relationship during the recruitment and hiring process, she should recuse herself from the hiring decisions, and the normal staffing and management processes and controls should be followed.



I Improper Personal Benefits

A conflict of interest may also arise when a director, officer, or employee, or a member of his or her immediate family, receives improper personal benefits because of his or her position at Honeywell. Such benefits may include gifts or loans from an entity or person with whom our Company does business. We must avoid accepting any such improper benefit.

In addition, a conflict of interest arises if a Honeywell employee assists a competitor to Honeywell's detriment. For example, providing confidential information to a spouse or partner who works for a competitor would constitute a conflict of interest and violate our Code.



Q: Jane works in the procurement department at Honeywell. She and a few of her friends have been working on starting up their own business in the 3D printing field. Jane has been working on the business plan after working hours and on weekends. She was also tasked with getting some pricing detail of potential suppliers. Jane goes on the Honeywell system and pulls the pricing data of some relevant suppliers. Is there anything wrong with Jane's actions?

A: Yes. This activity creates a conflict of interest. Jane should not use Honeywell information for her personal benefit or use or perform work for a personal business on Honeywell premises or during Honeywell working hours.



| Corporate Opportunities

In order to make objective business decisions on behalf of Honeywell, we must never compete with our Company. This means we may not take for ourselves any business or investment opportunities that we discover through our position at Honeywell or through Company property or information. In addition, we must never help anyone else take such business or investment opportunities for personal gain. This includes our family members and friends.

Safeguarding Company Property and Information

| Honeywell's Physical Property

Theft, damage, carelessness, and waste have a direct impact on our Company's success. We must therefore commit to protecting our Company's physical assets from theft, damage, loss, or misuse. This includes our facilities, vehicles, business equipment, merchandise, and supplies. If you suspect any form of fraud or theft, you should report it to your manager or supervisor immediately.

Authorized occasional personal use of certain Company equipment, such as telephones or internet, is sometimes appropriate. However, we must ensure our personal use is limited, does not interfere with our ability to do our work for Honeywell and does not violate Company policy or law. Never use Honeywell property for personal gain or that of another person or organization. You must also return any Company property you possess at the end of your employment.

I Honeywell's Confidential Information

We are each entrusted with our Company's confidential information. We must protect this sensitive information at all times. This generally includes any nonpublic information that might be of use to competitors or others, or which may be harmful to the Company if disclosed. Examples include business or marketing plans, supplier information, product design, manufacturing processes, existing and future merchandising information, and employee information.

We must never allow unauthorized personnel to access Honeywell's confidential information. We must take care not to lose, misplace or leave confidential information (or technologies containing such information, including computers, laptops, cell phones, PDAs, and software) unattended. Moreover, if we lose Company equipment or an item containing confidential Honeywell information (for example, a Honeywell laptop, phone, or the like), we should report the loss immediately to Honeywell Global Security.

In addition, we may not discuss Honeywell confidential information where it might be overheard by those who do not have a need to know it. This includes public places such as airport terminals, trains, and restaurants. It also includes open areas at Honeywell, such as Company restrooms and break rooms. We may only grant access to confidential information to coworkers who have a legitimate business need to know it. We must never use confidential information about the Company for personal gain or disclose it to others for their gain.

For more information, see our *Data Privacy and Confidential Information Security Program* as well as *Information Classification and Handling policies*.



Sam's vehicle was broken into and his laptop was stolen. What should Sam do?

- A. Sam should file a police report, notify his manager and file a Lost/Stolen Laptop form. If Sam does not have access to a computer, he should notify the IT Service Desk to obtain assistance to file the form. Employees should not leave devices in an unattended vehicle even if locked.

Q. Tina suspects her system has been compromised after clicking a link in an email that appeared to be legitimate. What should Tina do?

A. Tina should send the email in question as an attachment to CIRT@Honeywell.com (Computer Incident Response Team) or use the “Report Message” button on her Outlook toolbar to report the email. Since she believes her system has been compromised, Tina should note that and the automated email CIRT will send her with a ticket number (NTS number) to escalate the incident.

Q. Wil suspects an email in his inbox is phishing. He is not sure what to do so he asks his colleague if she thinks it is phishing. Is there something else he should do?

A. Yes! Wil should immediately report the suspicious email to CIRT by clicking the “Report Message” button on his Outlook toolbar, or send it as an attachment to CIRT@honeywell.com. There is no need to ask colleagues or supervisors as there may be a risk of accidentally spreading the email or clicking on a malicious link or attachment.



I Honeywell’s Intellectual Property

We work diligently to protect our Company’s intellectual property. “Intellectual property” includes any of our Company’s patents, trademarks, copyrights, or other intangible assets, such as, ideas, inventions, processes, or designs created on Company time, at Company expense, using Company resources, or within the scope of our job duties. We will identify any new inventions we make and will direct them to the Law Department for patent, copyright, or trade secret protection. You should report any suspected misuse of our Company’s intellectual property to the Law Department.

I Respecting the Intellectual Property Rights of Others

We respect the intellectual property rights of others. This means we must never knowingly infringe on the copyrights, trademarks, or patents of others. We may not download unlicensed software onto Company computers or duplicate, publish, or distribute copyrighted materials. We will not download songs, photographs, and videos without consent from the rightful owner. In addition, we will not disclose or use the confidential information of former employers.

See our *Licensing of Honeywell Intellectual Property Policy* for more details.



Q: Emilie often works through her lunch breaks, taking business calls at restaurants and in common areas in the building. Everyone around her seems engaged in their own conversations, so she assumes they aren't really paying attention to her. Can she discuss Honeywell business this way?

A: It depends. Emilie may take phone calls in public places, but she must exercise extreme caution when discussing Honeywell business. Any confidential information should not be discussed in public places, even if she assumes others are not listening to her conversations.

Q: Troy carries his Honeywell laptop on Company travel so he can use his free time on airplanes, trains, waiting areas, and other public places to work on business-related documents. Is this a problem?

A: It may be. It is impossible to know who may be sitting or passing nearby in any public place. When laptops and similar devices are used in public places for Company business, you must ensure that your screen is protected from onlookers at all times. In addition, such devices should never be left unattended.



Using Information Technology Resources

Honeywell provides many of us access to various electronic communications systems to use in our daily work. This includes computer and phone systems, laptops, cell phones, PDAs, and software. We have a duty to safeguard these systems and the technologies provided to us at all times. This means we must each do our part to prevent damage, harm, loss, and unauthorized access to these resources. Be sure to follow all security measures and internal controls in place for the resources you use. Always lock and secure your workstation, laptop, or mobile device if left unattended in a public place. Safeguard your login credentials to all Honeywell devices and accounts. Never share your credentials with any unauthorized agent.



Q. Tammy is refreshing her laptop. The Honeywell Solution Center technician requested her login credentials in order to move her files and configure her new laptop. Should she provide this information?

A. The Honeywell Solution Center is an authorized technician. Tammy has a choice to provide the credentials to the technician, or can remain nearby and available to login each time needed during the refresh process. During the refresh process, Tammy should ensure that there is no unauthorized access of personal data, export controlled data or other sensitive information by the Honeywell Solution Center technician. Once the refresh process has been completed successfully, Tammy should immediately change her password if her credentials were shared with the authorized technician.

Remember that electronic messages (such as emails, instant messages, and text messages) are permanent records of your communications. These communications can be altered and forwarded without your permission. For this reason, take particular care when drafting any electronic messages on Company letterhead or when using Honeywell resources.

Exercise good judgment and integrity when using these systems and technologies. Only use approved systems, devices, storage media, and/or services to process, store, or transmit Honeywell information. Do not install unapproved software on Honeywell computers, network servers, or other Honeywell Information resources without receiving advance authorization from Honeywell IT. Do not agree to any cloud services agreement on behalf of Honeywell. Do not download or send inappropriate, sexually explicit, illegal, or offensive material via these resources. You also may not use these resources to conduct outside work. To the extent permitted by local law, you should not have an expectation of privacy when using Company resources, as Honeywell may monitor your personal use. However, it is important to note that our Company will not interfere in our personal lives unless our conduct impairs our work performance or adversely affects our work environment or Honeywell's reputation.

For more information, see our *Acceptable Use of Information Resources Policy*.



Q. Jon is working in a nearby coffee shop using a Honeywell device. After finishing work, he logs out of the Honeywell network and connects to a personal Wi-Fi to download his favorite TV show to his computer. Is this conduct appropriate?

A. Limited non-business use that is not an abuse of Company time and/or resources and that does not violate the spirit and letter of Honeywell's policies may be permitted at the Honeywell manager's discretion. A TV show may be excessive non-business use depending on the situation. Employees should always act in an ethical and lawful manner and always obtain manager permission to use a Honeywell asset for non-business use.

Q. Mary is working on a sensitive project with a third-party supplier and needs to share sensitive information with the supplier to complete the work. The file size is very large and the supplier suggests that Maria upload the files in a third party's cloud system. What should Mary do?

A. Mary should use Honeywell IT approved transfer methods first. If another method is needed, work with Honeywell IT for approval to use a third-party solution. Note that export compliance and restricted data can **never** be moved into any cloud service. Contact your Export Compliance Officer for guidance.



I Social Media and Networking Sites

Social media has changed the way many of us share information on a daily basis. While social media create new opportunities for communication and collaboration, such media also brings additional responsibilities that we must know and follow. “Social media” sites include a vast array of websites and online resources. These include social networking sites (such as Facebook, Twitter, Instagram, Snapchat, YouTube, and LinkedIn), blogs, photo and video sharing sites, forums, and chat rooms, among many others. If your position at Honeywell requires posting on such sites, you must only post information for authorized Honeywell business purposes and only post information that complies with this Code and Company policies. In your personal “social media” interactions, act responsibly. What you post can adversely affect Honeywell’s reputation. Be careful to protect our reputation at all times. Never post confidential information about Honeywell or our colleagues, customers, suppliers, or business partners on any such sites.

For more information, see our *Social Media Policy*.



Q: Rita is excited about a potential new business project for Honeywell that could significantly increase revenues for the business. Rita is eager to share her excitement and news on her Facebook account. Is this a problem?

A: Although Rita is entitled to share her emotions in her social media networks, Rita, as a Honeywell employee, is not allowed to share confidential or proprietary information regarding the Company’s potential ventures.

Q: Carlos is thrilled about a business deal that has been written up in the Honeywell Newsroom. Carlos is eager to share his excitement and news on his LinkedIn and Twitter accounts. What would be the right way for Carlos to share this news in his social media?

A: As long as Carlos has Honeywell listed as his current employer and he includes a disclosure of his relationship to Honeywell on his tweet, he can share a link to the Newsroom story. He can also retweet or share any posts that appear on official external Honeywell channels.

Q: Ron, a marketing specialist, was reading an article online that contained information about Honeywell products that he considered to be inaccurate. Ron quickly responds in the comment section to correct such statement. Are Ron’s actions appropriate?

A: Although Ron’s intentions are good, he is not authorized to speak for Honeywell. Instead, Ron should notify his manager and the Communications team to address a response.



Avoiding Insider Trading

In order to protect investors, securities laws make it illegal for those with “material inside information” about a company to trade in its securities. “Material inside information” is information that is not generally available to the investing public and, if disclosed, would reasonably be expected to affect the price of a security or would influence your decision to buy, sell, or hold a security. Examples of material inside information include: earnings announcements; mergers, acquisitions, and dispositions; the outcome of major litigation; a change in control of the Company; and a change in senior management. This list of examples is not exhaustive and material inside information may arise in connection with other events not listed here. You should consult the *Insider Trading Policy* for a more detailed discussion on material inside information.

During the course of your work with Honeywell, you may learn about material inside information regarding Honeywell or another company that is not yet public. You may have access to this material inside information through your job duties with Honeywell or through other ways such as attending formal or informal meetings, overhearing a conversation, or seeing a document on a copy machine. Using this information or conveying this information to others for financial or other personal gain is a violation of our policy on insider trading and may also violate securities laws.

To avoid violating our insider trading policy and securities laws, DO NOT:

- Buy or sell shares in any company, including Honeywell, either directly or through family members or other persons or entities, if you have material inside information about that company;
- Recommend buying or selling shares in any company, including Honeywell, to anyone if you have material inside information about that company; or
- Convey material inside information to others outside the Company unless it is necessary for the Company’s business activities.

Certain individuals, because of their positions with the Company (including the Company’s directors, officers, and other key employees involved in certain financial and other forecasting activities), are viewed as possessing material inside information and are designated as “insiders.” These individuals are subject to

additional restrictions (such as pre-clearance authorization) which are more fully described in the *Insider Trading Policy*.

If you have material inside information about a company (including Honeywell), you may only trade in that company's securities once the information is made publicly available to ordinary investors through appropriate media sources.

Violations of securities laws may subject the individuals involved to severe consequences, including both civil and criminal prosecution. If you have questions or need guidance in this area, please consult the Law Department.



One Honeywell

How We Treat Our Customers

Building mutually beneficial relationships with our customers is important to our success as a Company. Maintaining such relationships requires that we provide safe, quality products and uphold the law in all our interactions with both commercial and government clients.



Providing Quality Products and Services

We strive to provide products and services that meet or exceed our customers' requirements for quality, reliability, and value.

We are expected to comply with all quality control standards that govern our job duties. This includes applicable laws and regulations, as well as internal control procedures designed to promote the safe, quality manufacture of goods. We are also expected to follow all contract specifications and honor built-in client specifications at all times.

In addition to holding ourselves accountable for quality goods and services, we must also hold our suppliers and other business partners accountable to ensure the quality of the products and services they provide to us.



Q: Min learns of a potential problem discovered during routine production line testing. The extent to which the problem could affect product safety is unknown at this time, and Min isn't sure what to do. Should Min speak up about this, even if she doesn't know all the details?

A: Yes. Producing and selling potentially unsafe products could result in customer and employee injury. Min should report the problem immediately, even if she isn't sure how production will be affected. Min should make her supervisor, quality assurance contact, or health and safety representative aware of the issue as soon as possible. If Min believes her concerns are not being adequately considered, she should consider raising them to the Law Department or via the Helpline, as discussed in "Asking for Advice and Voicing Concerns."



Seeking Business Openly and Honestly

Our actions in the marketplace define who we are as a Company. By competing on the quality of our goods and services, we uphold Honeywell's reputation. We will never seek to limit the competitive opportunities of our rivals in deceitful or fraudulent ways.

In addition, we never take advantage of anyone through unfair dealing practices. This means that we are careful not to misrepresent the quality, features, or availability of our products or services. In addition, we do not disparage or make untrue statements about our competitors' products or services. We seek to win business based on the quality of our products and our people, not through any improper means.

I No Commercial Bribery and No Improper Payments to Government Officials

We should not solicit, give, or receive commercial bribes or unlawful kickbacks. We should also be careful to avoid even the appearance of such improper conduct. “Commercial bribery” generally includes any situation where a Honeywell employee or someone acting on Honeywell’s behalf offers or gives something of value with the intent to improperly influence a business action or decision. Unlawful “kickbacks” generally include any situation where an employee receives an improper personal benefit in exchange for taking or refraining from taking an action on behalf of Honeywell. Honeywell will not tolerate commercial bribery or unlawful kickbacks, whether it is done directly or through a third party.

In addition to avoiding commercial bribery and unlawful kickbacks, we comply with all applicable anticorruption laws regarding improper payments to government officials. “Improper payments” include both direct and indirect payments, or an offer, promise or authorization of a payment or anything of value to a government official for purposes of improperly influencing government acts or decisions in order to obtain or retain business or otherwise secure a business advantage. Note that improper payments can take the form of cash, gifts, or lavish entertainment.

“Government officials” include officials of government entities, international organizations and political parties, employees of state-owned companies, and even employees of government-owned or controlled companies and joint venture partners.

Honeywell prohibits improper payments to government officials. It is important to remember that engaging in bribery, or even appearing to engage in such activity, can expose you and our Company to criminal liability.

Never retain a third party to make an improper payment to a government official or enter into any transaction where you suspect a third party is making such payments. Doing so violates our Code and anticorruption laws. We must carefully screen all third parties using our due diligence procedures before retaining them.

For more information please see our *Anticorruption Policy*.

For more information related to non-government persons or entities, see the “Gifts and Business Entertainment” section of our Code.



Q: Thomas works closely with third-party distributors who resell Honeywell products. A company interested in distributing Honeywell products approaches Thomas and offers to pay for his daughter's private school tuition if he receives the exclusive right to resell Honeywell's products in a specific sales region. What should Thomas do?

A: Thomas should end the discussion immediately and report the matter to the Law Department. Honeywell will not tolerate the solicitation or receipt of improper kickbacks in exchange for awarding contracts.

Q: Charlene is concerned that Honeywell will likely lose a big contract if she doesn't pay a local official a bribe. What should Charlene do?

A: Charlene should not pay a bribe or take any actions that could give the appearance that Honeywell will condone the payment of bribes to win a contract. No contract is worth violating the law or our standards of business integrity. The potential long-term damage to Honeywell's reputation and credibility more than offsets the short-term gain of winning the contract.

Q: Geri and Carol work together in Honeywell's buying group. Carol overhears a phone conversation between Geri and a potential supplier to Honeywell. Over the course of the call, it becomes clear that Geri plans to award a large contract to this supplier, even though the supplier's proposal does not offer Honeywell the best overall value. It also becomes clear that she's going to get a large sum of money in return. What should Carol do?

A: Carol should report what she heard to the Law Department immediately. It would appear that Geri is accepting a kickback from this supplier, which is illegal and can have severe consequences for the individuals involved, the supplier and Honeywell.

Q: Jerome would like to appoint Sales Rep Co as a sales representative to help Honeywell win projects in the oil and gas industry in a new territory. At a meeting with the owner of Sales Rep Co, Jerome finds out that the owner is also a board member of the state-owned oil and gas company, his key potential customer. Jerome thinks this is great for Honeywell because they would have unfettered access to all levels of the customer. Is there anything Jerome should be concerned about?

A: Jerome should be concerned about the conflict of interest related to the overlap of official duties of the sales rep and the duties for Honeywell. Jerome should raise this issue as soon as possible with the Global Integrity and Compliance Department before taking any further action.



Q: David won a project with a government customer. The government customer representative asked David to use a specific subcontractor and provided the contact details. David met with the subcontractor and discovered that they did not have the right skills or manpower to carry out the scope of services. He also found out that the owner of the subcontractor was the cousin of the government customer with whom he met. What should David do?

A: David should raise these issues to the Global Integrity and Compliance Department. There are several red flags with respect to the subcontractor's lack of relevant skills and manpower, as well as the potential government involvement that could indicate unethical and illegal conduct by the subcontractor and government customer representative. As Honeywell can be liable for the acts of third parties who represent it, Honeywell would need to investigate whether there are any conflict of interest or corruption risks before proceeding with hiring this subcontractor.



Compliance with International Competition Laws

Fair competition creates a healthy marketplace. It ensures our clients the best and most innovative products and services at the lowest prices. In order for Honeywell to compete lawfully and with integrity, we must comply with the competition laws in place in the countries where we do business. If competition laws apply to your job function, you must know and follow them at all times.

Competition laws are often complex, and generally forbid discussing any topics with competitors that may restrain trade. Such topics include (but are not limited to) price fixing, bid rigging, or dividing or allocating markets, territories, or clients. You should not discuss any of these topics with a competitor and if a competitor attempts to discuss any of these topics with you, you must stop the conversation immediately. Then, you should report the incident to your local supervisor, who will work with you in consultation with our Law Department. If you are attending a trade association meeting, or a social event, for example, exercise particular caution during discussions with competitors.

In addition, competition laws prohibit formal or informal agreements with suppliers, distributors, or clients that may restrict competition. Such agreements may include tying products, fixing resale prices, or refusing to sell to particular clients or buy from particular suppliers.

Finally, competition laws prohibit direct or indirect, formal or informal, agreements between or among companies to limit employee wages or benefits. Accordingly, we must be careful not to share compensation data with other companies with whom we compete for talent. Likewise, we generally may not agree with other companies not to solicit or hire each other's employees. If you are uncertain whether any such information sharing or "no-poaching" agreements are illegal, please consult the Law Department.

Through our work, we may obtain competitor information from our customers or other public sources. We must be particularly careful to handle this information in accordance with Company policy.

Please note that violating these laws may subject both the individuals involved and our Company to severe consequences.

For more information, see our *Antitrust Compliance Policy*. If you have any additional questions, seek guidance from our Legal Department before acting.



Q: Alejandro has a good friend who works for a Honeywell competitor. While at lunch one afternoon, his friend reveals her company's intent to raise prices on products in direct competition with his own. Alejandro says nothing in response to this, but feels this information could be important for Honeywell to use in making future business decisions. What should he do?

A: Alejandro should end the conversation immediately and provide a written summary of the incident to the Law Department. Engaging in discussions and acting on nonpublic information such as pricing could create the impression of an illegal collaboration between Honeywell and a competitor, which could have serious consequences for both companies and the individuals involved.



Following Accurate Billing Procedures

Our reputation in the marketplace is a critical Company asset. For that reason, we reflect accurately on all invoices to customers the sale price or cost of goods or services sold and other terms of sale. We each have a responsibility to maintain accurate and complete records in order to allow Honeywell to uphold this commitment. Never falsify any record – time card, expense report, sales numbers, test or quality records, or any other kind of record created during the course of your work for our Company – or make misleading or artificial entries on Honeywell's books or records.

Respecting Customer Property

At times, our customers may share their confidential information with us so that we may provide them with products and services. It is our responsibility to use, store, and carefully safeguard any such information in a manner that complies with all applicable laws. We each must take the necessary steps to secure this information and ensure it is used only for approved business purposes.

Interacting with Government Customers

For some of us, our work involves contracts with government entities, including government-owned or controlled companies. In these cases, we have a duty to know and follow applicable Company policies and the established laws, rules, and regulations that govern our interactions with government customers. It is important to note that these rules may be more strict and complex than those governing our dealings with commercial clients.

We must always conduct ourselves with honesty and integrity when attempting to win government work. This means, in part, that:

- We may not take actions that would give Honeywell an unfair competitive advantage, such as obtaining or using sensitive procurement information.
- All representations we make, including pricing and bids, must be accurate and complete.
- We must never offer, solicit, promise, give, or accept any form of bribe or kickback to or from an actual or potential government customer.
- We must never solicit or accept any form of bribe or gift from a supplier in exchange for favorable treatment in the award or performance of a government contract.
- We must ensure we only use reputable consultants, sales agents, or other professional service independent contractors for legitimate legal purposes.

For more information see the “No Commercial Bribery and No Improper Payments to Government Officials” section of our Code and our *Business Courtesies for U.S. Government Officials, Government Relations, and Anticorruption policies*.

All statements and records that we provide to government customers (including facility and quality reports and cost and pricing data) must be accurate. We must record our time accurately and identify and assign our time only to projects on which we work. In addition, we must take care to avoid mischarging any costs. We must follow all contract terms and may never use government property, equipment, or supplies in a manner that would be inconsistent with applicable law or contractual agreements.

We must follow all applicable rules and regulations that govern how we engage current or former government employees in discussions about potential job opportunities at Honeywell. We are each responsible for avoiding these types of conflicts of interest. Contacting or engaging in employment-related discussions with current or former government employees is subject to unique rules and procedures. These rules may also restrict the work that former government employees perform on our Company's behalf.

Please refer to our *Hiring or Engaging Former Government Employees Policy*.

We also are expected to safeguard classified and other sensitive information we acquire in connection with the work we do for our government clients. As required by the terms of our government contracts and other applicable regulations, we make this information available only to those who have a business need to know it and who have obtained the appropriate government clearance or other approvals. We must not share, distribute, or disclose classified or otherwise sensitive government information in a manner that would violate the terms of our government contracts.



A man and a woman are sitting at a desk in an office, looking at a laptop screen. The man is on the left, wearing a grey suit jacket, and the woman is on the right, wearing a blue hijab and a dark blazer. They are both holding pens and looking at the laptop. On the desk, there is a laptop, a pair of glasses, a coffee cup, and some papers. The background is a blurred office environment with large windows.

One Honeywell How We Treat Our Suppliers

Honeywell's suppliers are our partners in our ongoing drive for customer satisfaction. The high caliber of the materials, goods, and services they provide is linked directly to the quality, reliability, value, and prompt delivery of Honeywell products to our customers.

Seeking Long-Term Supplier Relationships

Together, we strive to build long-term relationships with our suppliers. We only use legitimate, business-related criteria when choosing suppliers. Our Company will enter into representation or supplier agreements only with companies believed to have demonstrated a record of and commitment to integrity. In addition, we never take unfair advantage of our suppliers through abuse of confidential information, misrepresentation of material facts or any other unfair dealing practice.

At Honeywell, we allow suppliers to compete fairly on the quality of their products and services. We will not be influenced by gifts or favors of any kind from our suppliers or potential suppliers. An occasional meal or entertainment in the normal course of business relations may be permissible, as long as:

- The representative of the supplier is in attendance.
- Such hospitality is not excessive or unusual in nature.
- The hospitality complies with applicable laws and is not otherwise prohibited by this Code.

In addition, when practical, hospitality should be reciprocated.

For more information, see the “Gifts and Business Entertainment” and “Interacting with Government Customers” sections of our Code.

Protecting Supplier Assets

We treat supplier confidential information with the same care as we treat Honeywell confidential information. We will not reproduce software provided to us by a supplier, nor will we incorporate it into our own internally developed software unless we are expressly permitted to do so by license.

One Honeywell

How We Treat Our Shareowners

At Honeywell, we strive every day to build value for the shareowners who have placed their trust in our Company and in each of us. To achieve this goal and create growth opportunities for our shareowners, we must do business with transparency and integrity.



Honest and Accurate Books and Records

Our shareowners rely on us to maintain accurate and complete books and records. These documents form the basis for all of our public disclosures and filings, which aim to give our Shareowners and the public an accurate view of our Company's operations and financial standing. In addition, Honeywell uses these documents to analyze Company operations and make important business decisions.

We have a duty and a legal obligation to make sure that the information we submit in all Company records is complete, accurate, and understandable. This includes, but is not limited to, all of the information we provide in the following records:

- Accounting and financial records
- Payroll documents
- Timecards and time recording systems
- Travel and expense reports
- Measurement, product testing, and performance records
- Customer and supplier records
- Design and engineering records
- Export and import declarations and records
- Project accounting records

Honest and accurate books and records play a significant role in our Company's reputation. As such, we must **never** make a false representation in Company documents.

Our Company's transactions will be executed only in accordance with management's general or specific authorizations. See our *Delegation of Authority Policy* and *Schedule of Executive Approvals* for more information.



Q Diego is an engineer working on a project for a government contract. The project costs are closely monitored, so he requires his manager's approval for his timesheets on weekly basis. This week, his manager is away on vacation. Can Diego approve his timesheets on behalf of his manager since he is confident that the recorded time is correct?

A. No. Approving your own time sheets not only represents a segregation of duties conflict, but it jeopardizes management controls that ensure we comply with applicable laws, regulations and contract provisions. Diego, therefore, should not approve his own time sheets even if he is certain they are correct. His manager should ensure appropriate delegation of his/her approval duties. IT initial system setup also should take into account segregation of duties conflicts and ensure there are proper controls in place for review and approval.

Q. Sandra is on a business trip with Ron, her manager. After a meeting, Sandra and Ron go out to dinner. Once the check arrives, Ron offers to pay for both meals. Is it correct for Ron to pay for both meals?

A. Yes. In business meals, the most senior leader at the table should take care of the meal. It is important to include in the corresponding expense report the name of all the attendees at the dinner.

Q. Sofia and Ron are account managers and are struggling to meet the quarter targeted numbers. They have some upcoming orders but the customer is not ready for shipment yet. Can Sofia and Ron bill the customer and hold the shipment to the customer until the customer is ready to receive it?

A. No, not in this case. Situations where Honeywell recognizes revenue upon the sale but the product remains in Honeywell's physical possession are called "bill and hold." There are legitimate reasons for a "bill and hold" transaction but in this case, Sofia and Ron are looking into billing the customer without shipment to inflate revenue and therefore this action is inappropriate.



Financial Disclosures and Fraud

Those of us with finance and accounting responsibilities have a special duty to ensure that our Company's financial statements are true and fair. Since Honeywell is a U.S.-based public company, we must submit various financial reporting and other filings to U.S. regulatory authorities. It is critical that these documents are accurate and timely. Therefore, if you have related responsibilities, you must comply with the legal and regulatory requirements that govern these reports. You also must know and follow Honeywell's internal controls that govern the same. Inaccurate, incomplete, or untimely records or reporting may result in legal liability for those involved.

Anyone found to have engaged in financial fraud will be subject to disciplinary action and could face substantial civil and criminal liability. You must report any suspected accounting or auditing irregularities immediately. Honeywell will not tolerate retaliation against you for disclosing, in good faith, questionable or improper accounting or financial matters.

Audits and Investigations

We all share a responsibility to cooperate with external and internal audits and investigations. This means we must provide auditors and investigators the information to which they are entitled, and maintain the confidentiality of the investigation. In addition, we may never attempt to interfere with or improperly influence their review. Refusal or failure to cooperate fully with an internal Honeywell or government investigation, or the failure to be fully truthful when providing evidence or testimony in such investigation, may result in disciplinary action, up to and including termination. If you have any questions about what information an auditor or investigator is requesting and entitled to obtain, consult with the Law Department or Corporate Audit. If a governmental investigation occurs, management must contact the Law Department as soon as possible before proceeding.

Records Management

It is our shared responsibility to retain Honeywell business records as long as needed for business purposes or longer, if required by law, tax, regulatory, or other standards. In addition, we need to know when and how to destroy these business records. Follow all rules set forth in our *Records Management Policy*. The *Records Management Policy* includes the Records Retention Schedule, which provides guidance regarding the

length of time various records should be retained. Honeywell encourages employees to review their records on a regular basis and to purge old documents in accordance with the *Records Management Policy*.

If you know that documents in your control may be relevant to a lawsuit or government investigation, do not alter, conceal, or destroy them. In some cases, the Law Department may instruct you to preserve certain documents that might otherwise be destroyed under Honeywell's *Records Management Policy*. In such cases, you should follow the instructions provided by the Law Department.

Inquiries from the Media and Analysts

We strive to provide clear and accurate information to the media, financial analysts, and the general public. This helps us maintain integrity in our relationships with our external stakeholders, which in turn strengthens our corporate reputation. Since accurate information is so crucial, only certain individuals may communicate with the media, financial analysts and members of the investment community. If you receive a request for information from the media, forward it to Corporate Communications. If you receive a request from a financial analyst or member of the investment community, forward it to Investor Relations.

See our *External Communications Policy* for more information.



One Honeywell

How We Treat Our Communities and Our World

In order to grow as a Company, we must work to have a positive impact on the communities that sustain us. We must work to respect and protect not only the communities where we live and work, but also our planet and its inhabitants.



Protecting the Environment

We are committed to health, safety, and the environment, and to social considerations in the communities in which we operate. As part of this commitment:

- We minimize the environmental footprint of our operations through prevention of illness, injury, and pollution.
- We safeguard natural resources, ensure worker and public health, and actively promote and develop opportunities for expanding sustainability through innovation. This includes, increasing fuel efficiency, improving security and safety, and reducing emissions of harmful pollutants.
- We are committed to compliance with all of our health, safety, environmental, and legal requirements everywhere we operate.
- Our commitment to health, safety, and the environment is an integral aspect of our design of products, processes, and services, and of the lifecycle management of our products.
- Our management systems apply a global standard that provides protection of both human health and the environment during normal and emergency situations.
- We identify, control, and endeavor to reduce emissions, waste and inefficient use of resources and energy.
- We are open with stakeholders and work within our communities to advance laws, regulation, and practices that safeguard the public.
- We abide by our Company's own strict standards in cases where local laws are less stringent.
- Our senior leadership and individual employees are accountable for their role in meeting our commitments.
- We measure and periodically review our progress and strive for continuous improvement.

If you have a concern about workplace health, safety, or environment, please contact your local supervisor, a member of the Health, Safety and Environment function, or visit the HSE website.

Respecting Human Rights

Our Code, along with other Honeywell policies, establishes practices and standards that address a broad range of human rights and workplace issues. Honeywell respects and values the diversity reflected in our various backgrounds, experiences and ideas. Together, we provide each other a diverse and inclusive work environment that fosters respect for all of our coworkers and business partners. Refer to the section titled “Respecting Each Other and Promoting a Positive Workplace” for more information.

Our Company does not condone or employ child labor. At Honeywell, we will not employ anyone under the age of sixteen, even if authorized by local law. If local law is stricter than Company policy, we will comply with that law. In addition, we will never use forced, indentured, or involuntary labor in any of our operations and we will not tolerate exploitation of children, physical punishment, or abuse. As part of our commitment to our communities and our world, Honeywell will not tolerate any instances of human trafficking, or other forced labor. We will also never conduct business with any third parties (such as agents or suppliers) who engage in human trafficking or forced labor. Honeywell has adopted the Supplier Code of Conduct that provides clear expectations for suppliers to ensure that they treat their employees with dignity and respect.

Making Political and Charitable Contributions

Our Company understands the many ways in which the political process enriches our communities. Freedom of belief and conscience are fundamental rights, and we are free to communicate our opinions verbally, in writing or in graphical form without threat of censorship. However, when we participate in such activities, we should do so on our own time, at our own expense, and ensure that our activities do not conflict with the Code.

We should not use Honeywell property for personal political activities. In addition, we should never engage in any political activities on Honeywell’s behalf, unless authorized by the Government Relations function. Never coerce a coworker, especially those with whom you have a reporting relationship, to support your particular causes.

As interested citizens, Honeywell employees are free to make individual personal contributions to candidates of their choice. Employees who are U.S. citizens or who are U.S.-based permanent residents are eligible to participate in the Honeywell International Political Action Committee (HIPAC), provided they meet certain legal requirements. To determine if you are eligible to participate in the HIPAC, contact the Government Relations function, or the general counsel of your business unit.

Lobbying activities are highly regulated. Therefore, we may not make any contacts with government officials in an attempt to influence legislation, regulation, policy, or other governmental actions on Honeywell's behalf without authorization from the Government Relations function. For more information, please see our *Government Relations Policy*.

Honeywell is committed to social responsibility in every step of the Company's activities. Oftentimes, our Company will support charitable activities in our local communities. Honeywell may engage in such charitable activities, so long as both the charity and the activity have been approved by management, the Law Department, or Honeywell Hometown Solutions.

You may not send emails in an attempt to raise money for an unapproved charity or any other fundraiser on Honeywell's network. In addition, you may not use Honeywell assets, including Company time, for personal charitable pursuits.

Complying with International Trade Controls

Honeywell is committed to compliance with all applicable trade laws. This includes import and export control laws, as well as regulations in the countries where our Company does business.

Export control laws govern the transfer of goods, services, and technology to another country. Note that export controls govern many types of exchanges of information across national borders, including email transmissions and web access to different servers that could contain export-controlled technical data. The U.S. also controls the transmission of certain export-controlled technical data to non-U.S. persons within the United States.

Import laws and regulations govern the importation of goods. Such laws ensure only admissible goods enter into the importing country, and that the correct amount of duties and taxes are paid on those goods. Honeywell must maintain, among other things, accurate information on the commodity/nomenclature, commercial value, and country of origin of all imported goods.

As Honeywell continues to expand globally, those of us who deal with the importation of goods and export-controlled items, technology, and services have an obligation to understand and comply with applicable regulations. This includes import and export laws, technology control plans, the conditions, and provisos of export license authorizations that may apply to their business or facility and Honeywell's *International Trade Compliance Policy*.



Waivers of Our Code

In extremely limited circumstances, Honeywell may find it appropriate to waive a provision of our Code. Approval of any action not compliant with this Code must be sought in advance and may be granted only by the Chief Executive Officer or Senior Vice President & General Counsel of Honeywell. All waivers for members of the Board of Directors or for executive officers of Honeywell require the pre-approval of the Board of Directors (or a Committee thereof) and will be promptly disclosed when required by regulation or law. When a waiver is granted, the Board or responsible Committee shall ensure that appropriate controls are in place to protect the Company and its shareowners.

Honeywell International

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