

Honeywell's Slavery and Human Trafficking Statement 2016

Our Business and Supply Chain

Honeywell is a global, diversified, technology-driven industrial company headquartered in Morris Plains, NJ, in the United States. Honeywell operates in approximately 70 countries (including the UK) and employs approximately 130,000 employees through five different business units: Aerospace, Performance Materials and Technologies, Safety and Productivity Solutions and Home and Building Technologies. Honeywell procures a vast variety of products and services from suppliers around the world.

The Honeywell Code of Business Conduct, the Honeywell Supplier Code of Conduct and the Honeywell Human Trafficking Policy set forth Honeywell's expectations and policies regarding human trafficking and slavery. Honeywell has zero tolerance for human trafficking and slavery, has measures in place to ensure that Honeywell employees, agents and suppliers do not engage in human trafficking and slavery activities, and continually revises those measures to keep in step with relevant legislation such as the Act.

This financial year, Honeywell has taken the following steps to combat human trafficking and slavery:

New Human Trafficking Policy

Honeywell published a new corporate-wide policy directed at combatting human trafficking. Honeywell's global policy specifies that Honeywell employees, agents and supplier shall **not** – amongst other activities -:

- (1) Engage in human trafficking;
- (2) Use forced labor;
- (3) Destroy, conceal, confiscate, or otherwise deny an employee access to that employee's identity or immigration documents, such as passports or drivers' licenses, regardless of issuing authority;
- (4) Make material misrepresentations during the recruitment of employees regarding: (1) the key terms and conditions of employment, including wages and fringe benefits, (2) the location of work, (3) living conditions, (4) housing and associated costs (if employer or agent provided or arranged), (5) any

significant cost to be charged to the employee, and, (6) if applicable, the hazardous nature of the work;

(5) Use recruiters who do not comply with local labor laws of the country in which the recruiting takes place; or

(6) Charge employees recruitment fees;

Honeywell's Supplier Code of Conduct

Honeywell also published a [Supplier Code of Conduct](#) during the past year.

The Supplier Code of Conduct is flowed down to Honeywell's global suppliers, which in turn are requested to ensure that the same requirements are met throughout the supply chain. The Supplier Code of Conduct is incorporated as part of the Honeywell standard form procurement contract. Breach of contract, including breach of the Supplier Code of Conduct, allows Honeywell to terminate the contract.

The Supplier Code of Conduct sets forth the expectation that Honeywell's suppliers shall not traffic in persons or use any form of slave, forced, bonded, indentured, or involuntary prison labor. This includes a prohibition on the transportation, harboring, recruitment, transfer, or receipt of persons by means of threat, force, coercion, abduction, fraud, or payments to any person having control over another person for the purpose of exploitation.

As part of this commitment to prohibiting human trafficking, Suppliers may not engage in any of the following conduct:

1. Destroying, concealing, or confiscating identity or immigration documents;
2. Using fraudulent recruiting tactics; or
3. Charging employees unreasonable recruitment fees or providing inadequate housing based on local standards, laws and directives.

Audits

Honeywell has a program in place to conduct audits of its supply chain to ensure compliance with the Supplier Code of Conduct, including Honeywell's policies

regarding slavery and human trafficking. Honeywell reserves the right to terminate a supplier relationship if the supplier fails to comply with applicable legal requirements or the Honeywell Supplier Code of Conduct, including Honeywell's policies aimed at combatting slavery and human trafficking.

Internal Accountability

Honeywell also requires its employees to follow the Honeywell Code of Business Conduct (see the file [here](#)) and its Human Trafficking Policy. The Honeywell Code of Business Conduct sets forth clear expectations regarding employee behaviors and compliance with laws. Honeywell has zero tolerance for human trafficking or slavery. An integrity and compliance hotline is open at all times to all Honeywell employees, customers, suppliers and other individuals to alert the Honeywell Integrity and Compliance Team on an anonymous basis.

Training

Honeywell employees are required to complete periodic training on the Honeywell policies and Code of Business Conduct. Honeywell managers are also required on an annual basis to certify that they have read and understand the Code of Business Conduct and that they have reported any concerns regarding potential violations of Honeywell's Code of Business Conduct.

IMPORTANT NOTE

The signed statements for individual legal entities can be requested through email.

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