

**Honeywell**

THE POWER OF **CONNECTED**

# **ANTICORRUPTION POLICY**

Policy 2066 Highlights

ENTER

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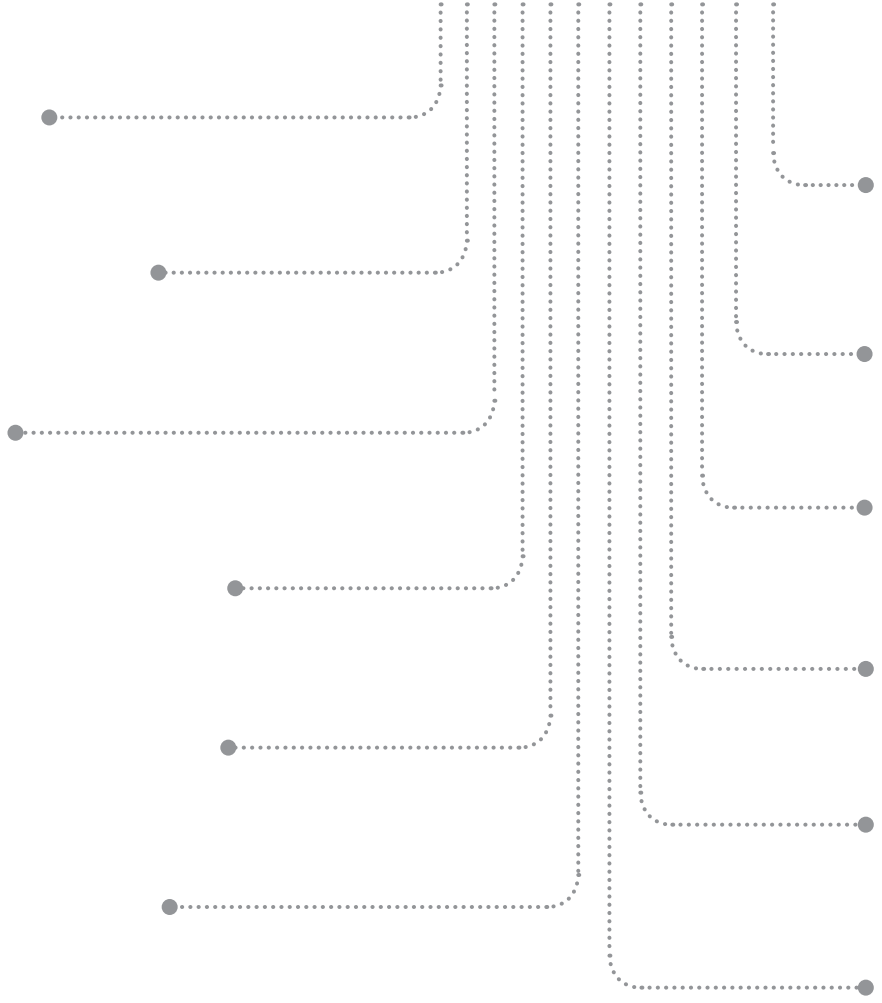
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# 1. Introduction

Honeywell and its Employees, Companies, Joint Ventures (JVs), and third parties representing Honeywell must comply with various anticorruption laws, including the US Foreign Corrupt Practices Act (**FCPA**). These laws, Honeywell's Anticorruption Policy 2066 (**Policy**) and the Honeywell's Code of Business Conduct prohibit bribery in any form.

The purpose of this document is to provide a high level overview of the key provisions of the Policy with easy access hyperlinks to various definitions, approval forms, checklists and tools to help employees understand and comply with the Policy.

You should not rely on the information in this document as an alternative to the actual content of the Policy (which should also be read in conjunction with all other applicable Honeywell policies).

# 2. Sales Intermediaries

Sales Intermediaries (**SIs**) include distributors, agents, sales reps, integrators, and sales consultants.

To mitigate anti-corruption risks, certain SIs must undergo [Due Diligence](#):

- Any third party receiving a commission, success fee, retainer;
- If Honeywell sets the terms and conditions for sales to the [Customer](#);
- Honeywell attends meetings with the SI and Customer; or
- Government interaction is needed to facilitate sales.

If Due Diligence is required, [Employees](#) must complete the [Sales Intermediary Due Diligence Package](#), obtain prior approval from the Global Integrity and Compliance Department and the necessary SEA approvals to appoint the SI.

If unsure whether Due Diligence is required, Employees should complete the [Due Diligence Checklist](#) and submit it to their Legal and Contracts Department or contact the [Global Integrity & Compliance Department](#).

# 3. Suppliers

Certain third parties providing goods and/or services should also undergo Due Diligence. Examples include certain subcontractors, customs brokers, travel agents, HSE consultants, immigration and/or visa service providers.

Employees should work with their Legal and Procurement Departments before appointing suppliers to ensure Due Diligence has been conducted and agreements have anti-corruption clauses.

## 4. Gifts & Hospitalities (G&H)

All gifts and hospitality must meet the General Rule: they will not influence or appear to influence a business decision, create an actual or apparent conflict of interest, or appear on the list of prohibited G&H.

Cash, per diems, personal services, loans, illegal or inappropriate G&H are never acceptable.

If the G&H meets the General Rule, [click here](#) to determine whether prior approval is required. Local laws impose strict limits on G&H to [Government Officials](#) so it is important to always check if any limits apply with the Global Integrity and Compliance Department or through the [G&H App](#).

Employees have [multiple ways](#) to submit their G&H request .

If the G&H does not meet the General Rule, employees cannot provide or accept it regardless of the value.

## 5. M&A and Joint Ventures

Acquisitions cannot be completed before Due Diligence has been successfully conducted. Employees should work with the Global Integrity & Compliance and M&A Department to complete Due Diligence and the actions outlined in the [M&A toolkit](#).

A JV or Joint Bidding Arrangement (**JBA**) cannot be established before Due Diligence has been successfully conducted. Employees should work with the Global Integrity & Compliance and the M&A Department to complete Due Diligence.

## 6. Conflicts of Interest

Conflicts of Interest occur when an Employee's personal interests interfere with, or appear to interfere with his/her ability to perform his/her job for the Company without bias.

Conflicts of Interest should be avoided. Employees must report all Conflicts of Interest to the HR Department and/or SBU GC or the Global Integrity and Compliance Department for review.

## 7. Recruitment

The following candidates for employment are high risk: current and former Government Officials or a nominee of current [Government Officials](#). For example, a relative of a Government Official is considered high risk recruit. Hiring such candidates could be considered bribery or could create a Conflict of Interest.

Employees must get prior approval from HR, the SBU GC and Global Integrity and Compliance Department to hire these individuals.

## 8. Charitable Contributions and Sponsorships

All charitable contributions and sponsorships must be in line with the applicable Honeywell policies and meet the General Rule: they cannot be offered, promised or given to improperly influence any individual, or in exchange for any improper favor or benefit.

Integrity and Compliance approval is required if it will benefit/implicate a Government Official and the amount is over USD \$10,000 over a 12-month period.

Please find the link to the charitable contributions and sponsorship form [here](#).

## 9. Facilitation Payments

Honeywell prohibits facilitation payments.

Payments requested by a Government Official who threatens an Employee's safety or security constitutes extortion and is not considered a facilitation payment. Any such payment should be reported to your SBU GC or the Global Integrity and Compliance Department as soon as possible.

## 10. Appointing Outside Directors

Outside Directors must comply with anticorruption laws, including the FCPA and the Policy's sections related to SIs, JVs and JBAs and facilitation payments.

## 11. Accurate Books and Records

All Employees must keep accurate books and records for all expenses, payments, and other documentation related to this Policy.

## 12. Reporting Concerns

Employees have a responsibility to report violations or suspected violations of this Policy through the various reporting methods: Law Department, Integrity and Compliance Department, [hotline](#) or [email](#).

Honeywell investigates all matters raised and has a strict no retaliation policy for concerns raised in good faith.

Nothing prohibits Employees from raising concerns with any government department, agency or commission.

