



# **HONEYWELL'S SUPPLIER CODE OF BUSINESS CONDUCT**

**Honeywell**

# TABLE OF CONTENTS

<b>Honeywell’s Supplier Code of Business Conduct.....</b>	<b>3</b>
<b>Labor and Human Rights .....</b>	<b>4</b>
Fair Treatment.....	4
No Involuntary Labor or Human Trafficking.....	4
No Child Labor .....	4
Wages and Benefits .....	4
Freedom of Association .....	5
Subcontractor Compliance .....	5
<b>Health and Safety .....</b>	<b>6</b>
Occupational Safety.....	6
Emergency Preparedness.....	6
Occupational Injury and Illness.....	6
Sanitation, Food and Housing.....	6
<b>Environmental.....</b>	<b>7</b>
<b>Integrity and Compliance .....</b>	<b>8</b>
Books and Records.....	8
Business Integrity.....	8
Conflicts of Interest.....	8
Protection of Intellectual Property.....	8
Substance Abuse .....	8
Responsible Sourcing of Minerals.....	9
Quality .....	9
Privacy and Information Security.....	9
<b>Management System.....</b>	<b>10</b>
<b>Reporting Concerns .....</b>	<b>11</b>

# HONEYWELL'S SUPPLIER CODE OF BUSINESS CONDUCT

Honeywell is committed to integrity and compliance in everything we do. As part of that commitment, Honeywell expects its suppliers to ensure that they provide their employees a safe working environment, treat their workers with dignity and respect, engage in environmentally sound and sustainable manufacturing processes, and comply with all applicable laws in all countries in which they conduct business. Suppliers are expected to foster a culture where employees and managers can communicate openly and raise concerns without fear of retaliation, intimidation, or harassment.

Honeywell's Supplier Code of Conduct (the "Supplier Code") sets forth Honeywell's commitment to integrity and compliance within its global supply chain. We expect all of our suppliers to adhere to the Supplier Code and to ensure these requirements are met within their supply chain. Honeywell may visit (and/or have external monitors visit) supplier facilities, with or without notice, to assess compliance with the Supplier Code. Upon request, Supplier will provide Honeywell all information reasonably required to enable Honeywell to assess compliance with the Supplier Code. Adherence to the requirements set forth in the Supplier Code will be considered in making sourcing decisions. Failure to comply with the Supplier Code may result in termination as a Honeywell supplier and possible legal action.

# LABOR AND HUMAN RIGHTS

## Fair Treatment

Suppliers shall commit to a workplace free of harassment and unlawful discrimination. Examples of conduct that could be characterized as “harassment” include, without limitation, threatening or subjecting workers with harsh or inhumane treatment, sexual harassment, sexual abuse, corporal punishment, mental coercion, physical coercion, verbal abuse, and unreasonable restrictions on entering or exiting company-provided facilities.

## No Involuntary Labor or Human Trafficking

Suppliers shall not traffic in persons or use any form of slave, forced, bonded, indentured, or involuntary prison labor. This includes 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:

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

## No Child Labor

Child labor is strictly prohibited. Suppliers shall not employ children. The minimum age for employment or work shall be 16 years of age, the minimum age for employment in that country, or the age for completing compulsory education in that country, whichever is higher. This Supplier Code does not prohibit participation in legitimate and lawful workplace apprenticeship programs.

## Wages and Benefits

Suppliers shall pay all workers at least the minimum wage required by applicable laws and regulations and provide all legally mandated benefits. In addition, suppliers shall comply with all applicable maximum working hours laws and regulations and shall compensate workers for overtime hours at or above the rate required by applicable laws and regulations.



## **Freedom of Association**

Suppliers shall recognize and respect employee rights to join or not join any lawful organization. Suppliers shall recognize that their employees have the right to seek labor representation, join unions and bargain collectively in the places in many of the places in which they operate. Supplier shall respect their employees' right to make informed choices about labor representation, free of coercion. Where a supplier's employees have labor representation, the supplier shall strive to build a positive, business-focused relationship with the representatives while continuing to meet its commitments to each of its employees.

## **Subcontractor Compliance**

Suppliers agree that any workers supplied by subcontractors to work at the Supplier's facilities will be treated in a manner consistent with the principles set forth in this Supplier Code.



# HEALTH AND SAFETY

Suppliers shall comply with all applicable health, safety and environmental laws and regulations. Suppliers should address the following in their health and safety programs

## **Occupational Safety**

Suppliers shall commit to the safety and health of their employees, and shall ensure that required training of personnel has been completed prior to initiating any work activity. Suppliers should have or subscribe to a written safety and health program. Suppliers are responsible for addressing and controlling worker exposure to potential safety hazards in conformance with all applicable standards and/or regulations and by utilizing suitable means, e.g., design, engineering and administrative controls, preventative maintenance, training, work procedures, and appropriate personal protective equipment.

## **Emergency Preparedness**

Suppliers shall have emergency plans and response procedures that implement all applicable laws and regulations regarding: emergency preparedness, reporting and notification; evacuation procedures, training and drills; appropriate hazard detection and suppression equipment; and adequate exit facilities from suppliers' sites.

## **Occupational Injury and Illness**

Suppliers shall have procedures and systems to manage, track and report occupational injuries and illnesses, and exposure of workers to chemical, biological and physical agents. These procedures and systems shall implement all applicable laws

and regulations, including, as applicable, provisions to (i) encourage worker reporting, (ii) classify and record injury and illness cases, (iii) investigate cases, and (iv) implement corrective actions.

## **Sanitation, Food and Housing**

Suppliers shall provide workers with clean toilet facilities, access to potable water and if food preparation and storage facilities are provided these shall be sanitary. Worker dormitories provided by the Supplier or a third party agency shall meet acceptable living conditions. Such facilities shall be clean and safe and provide adequate emergency egress, adequate heat and ventilation, reasonable personal space, and reasonable entry and exit privileges.

# ENVIRONMENTAL

We expect our suppliers to integrate environmental responsibility into their operations and minimize adverse effects on the community, environment and natural resources, while safeguarding the health and safety of workers and the public. Suppliers shall also comply with all applicable health, safety and environmental laws and regulations when conducting business. By way of example, suppliers shall:

- Obtain and keep current all required environmental permits and registrations;
- Reduce, control and/or eliminate wastewater, waste and pollution at the source;
- Reduce, control and/or eliminate air emissions of volatile chemicals, corrosives, particulates, aerosols and combustion products;
- Conform to applicable labeling and warning requirements;
- Identify, manage, store, move and handle hazardous substances in accordance with law; and
- Maintain a program appropriate to their size and resources to understand and mitigate greenhouse gas emissions in their operations, facilities, and supply chain.



# INTEGRITY AND COMPLIANCE

## Books and Records

Suppliers are expected to create and maintain accurate books and records, and not alter any record entry to conceal or misrepresent the underlying transaction represented by it. All records, regardless of format, made or received as evidence of a business transaction must fully and accurately represent the transaction or event being documented. When a record is no longer needed to conduct current business, records should still be retained based on applicable legal retention requirements.

## Business Integrity

Suppliers shall comply with the laws and regulations of all applicable jurisdictions, including all applicable anticorruption laws. Suppliers may not solicit, give or receive commercial bribes or unlawful kickbacks and must also be careful to avoid even the appearance of such

improper conduct. Suppliers will conduct their businesses without engaging in corrupt practices and will not take advantage of anyone through unfair dealing practices. This means that suppliers should not misrepresent the quality, features or availability of their products or services. Suppliers also agree to maintain integrity, transparency and accuracy in corporate record keeping.

## Conflicts of Interest

Suppliers are required to uphold Honeywell's reputation and avoid all conflicts of interest or situations giving the appearance of a potential conflict of interest. A relevant conflict of interest typically occurs when personal interests interfere with or appear to interfere with Supplier's ability to perform the work/services without bias. Suppliers are expected to notify Honeywell if an actual or potential conflict of interest arises. This includes any situations of potential or apparent

conflicts between Supplier's or its employees' personal interests and the interests of Honeywell.

## Protection of Intellectual Property

Suppliers shall respect intellectual property rights and safeguard proprietary information. Transfer of technology and know-how shall be done in a manner that protects intellectual property rights.

## Substance Abuse

Suppliers shall have policies and procedures in place to ensure that employees do not conduct work while under the influence of alcohol, illegal drugs, or misused medications (whether prescription or non-prescription). In addition, suppliers will put in place policies and procedures that prohibit employees from using, possessing, transferring or selling illegal drugs or alcohol or misused medication (whether prescription or non-prescription) while at work or while on the job.



## **Responsible Sourcing of Minerals**

Suppliers shall have a conflict minerals policy to reasonably assure that the tantalum, tin, tungsten and gold in the products they manufacture does not directly or indirectly finance or benefit armed groups that are perpetrators of serious human rights abuses in the Democratic Republic of the Congo or an adjoining country. Suppliers shall exercise due diligence on the source and chain of custody of these minerals and make their due diligence measures available upon request.

## **Quality**

Suppliers shall take due care to ensure their work product meets applicable quality standards. Suppliers shall put in place quality assurance processes to identify defects and implement corrective actions, and to facilitate the delivery of a product whose quality meets or exceeds the contract requirements.

Suppliers shall develop, implement, and maintain methods and processes appropriate to their products to minimize the risk of introducing

counterfeit parts and materials into deliverable products. Effective processes should be in place to detect counterfeit parts and materials, provide notification to recipients of counterfeit product(s) when warranted, and exclude them from the delivered product.

## **Privacy and Information and Cyber Security**

Suppliers shall commit to protecting the reasonable privacy expectations of personal information of everyone they do business with, including suppliers, customers, consumers and employees. Suppliers shall protect confidential and proprietary information, including confidential and proprietary information of

others and personal information, from unauthorized access, destruction, use, modification and disclosure, through appropriate physical and electronics security procedures. Suppliers shall comply with applicable privacy and information security laws and regulatory requirements when personal information is collected, stored, processed, transmitted, and shared. Suppliers shall commit to protecting their Information Technology (IT) systems and Operational Technology (OT) systems to avoid unauthorized access to and disruption of their systems and shall otherwise safeguard their assets so as to protect the interests of their customers, employees, consumers and suppliers.



# MANAGEMENT SYSTEM

Suppliers shall adopt and implement a management system to comply with the principles set forth in this Supplier Code. Management Systems will vary from supplier to supplier based upon the size and scope of the business and risks. The management system will be designed to ensure

- Compliance with applicable laws, regulations and customer requirements;
- Conformance with this Supplier Code;
- Mitigation of risks, and
- A process to track, measure and drive improvements in the management system.

The management system should contain at a minimum the following elements:

- **Company Commitment and Management Accountability** through policy statements affirming the supplier's commitment to compliance and identifying a company representative[s] responsible for ensuring implementation of the management systems.
- **Risk Assessment and Risk Management** process to identify risks associated with the supplier's operations. As regulations continue to change and emerge, the supplier's management system should include a process to monitor and track regulatory activity that may impact its business and that of its customers relating to, but not limited to, environmental, restricted material usage, conflict minerals and hazardous waste.

- **Training Programs** for training managers and workers to implement the supplier's policies, procedures and improvement objectives and to meet applicable legal and regulatory requirements.
- **Standards, Audits and Assessments** to ensure conformity to legal and regulatory requirements, the content of the Supplier Code and customer contractual requirements.
- **Corrective Action Process** for timely correction of deficiencies identified by internal or external assessments, inspections, investigations and reviews.
- **Documentation and Records** to ensure compliance with the principles of this Supplier Code.
- **A Process to Communicate Supplier Code Requirements to Suppliers** and monitor supplier compliance to the Supplier Code of Conduct.

# REPORTING CONCERNS

If you become aware of a situation that may involve a violation of this Supplier Code, you have a responsibility to report it. Please note that failure to comply with this Supplier Code may result in termination as a Honeywell supplier and possible legal action.

You may make a report using the Honeywell ACCESS Integrity Helpline by:

**Calling:** 800-237-5982; or

**Emailing:** [access.integrity.helpline@honeywell.com](mailto:access.integrity.helpline@honeywell.com)

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. All reports will be investigated promptly and thoroughly, consistent with applicable law and, upon the advice and approval of the Honeywell Law Department, may be reported to the appropriate authorities.



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