

# **ANTICORRUPTION POLICY**

Policy 2066 Highlights

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Honeywell International Inc. (“Honeywell”) maintains this Anticorruption Policy in furtherance of our culture of doing business with integrity and compliance, and to promote our compliance with laws that prohibit bribery of Government Officials and private individuals in the conduct of international business. The Chief Compliance Officer owns this Anticorruption Policy and has the authority to approve exceptions.

The authoritative version of this Policy, along with supplementary material, is available [here](#) and is applicable to all Honeywell companies, entities, and majority-owned affiliates.

This Policy builds on the Honeywell Code of Business Conduct and Supplier Code of Business Conduct. All businesses, functions, employees, and agents must comply with the mandatory requirements of this Policy and with all applicable laws and regulations.

If there are any questions or an interpretation or exception is needed, please contact a member of the Integrity and Compliance Department.

# INTRODUCTION

Honeywell International Inc., (“Honeywell”) and its Directors, Officers, Employees, Contract Staff and its subsidiaries and majority-owned affiliates, Joint Ventures (JVs) and Joint Bidding Arrangements (JBAs), and third parties representing Honeywell must comply with various anticorruption laws, including the US Foreign Corrupt Practices Act (FCPA) and the UK Bribery Act (UKBA). 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 to help others understand the expectations of 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).

# PROHIBITED ACTIVITIES

Honeywell prohibits the payment or receipt of all bribes and Facilitation Payment as follows:

- (1). Offering, paying, promising to pay, or authorizing payment of anything of value to any third party, including a customer or a Government Official, to improperly influence a business outcome or to expedite a routine government action;
- (2). Accepting or requesting any payment, promise of payment, or anything of value to improperly influence a business outcome; or
- (3). Engaging or working with a Third Party (Sales Intermediaries, Suppliers, etc.) to do any activities described in above (1) and (2).

Payments requested by a Government Official who threatens the safety or security of a person are extortion and are not considered a Facilitation Payment. An extortion payment must be approved in advance and in writing by the General Counsel for Anticorruption. In all circumstances, the payment must be promptly reported and recorded accurately in Honeywell's records.

# REQUIREMENTS FOR THIRD PARTIES

## 3.1 Contracting with Sales Intermediaries

Honeywell defines Sales Intermediaries (SIs) as any third party authorized to solicit sales or promote Honeywell products/services or any third party (excluding those set out in Section 3.2) who acts, or appears to act, on Honeywell's behalf in front of an actual or prospective customer. SIs include distributors, agents, sales representatives, sales consultants, dealers, teaming agreements, consortia or integrators.

All SIs MUST have:

- (1). A legitimate business purpose for appointment;
- (2). Qualifications sufficient to fulfill the purpose of the appointment;
- (3). Reasonable compensation, rebates, and/or discount rates given the scope of services, market conditions and the territory of service provision and must be reasonably commensurate with the value of the actual services provided; and
- (4). Been assessed for the appropriate level of due diligence based upon their risk, proposed role, and Honeywell policy.

Honeywell prohibits commission-based compensation structures for SIs unless (i) required under local law, and (ii) approved by the Integrity and Compliance Department in advance.

To mitigate anti-corruption risks, engaging a SI requires:

- (1). Due Diligence;
- (2). Monitoring;
- (3). Recordkeeping; and
- (4). Agreements.

## 3.2 Contracting with Suppliers

All suppliers are subject to due diligence and persistent screening. When the persistent screening of a new or existing supplier generates red flags, the Integrity and Compliance Department will contact the relevant members of the Sourcing Department to gather additional information and determine remedial measures and/or whether business can continue. Any suppliers – regardless of risk level – are subject to hard blocks if the Integrity and Compliance Department is unable to address such red flags.

# OFFERING OR RECEIVING BUSINESS COURTESIES

Business Courtesies include gifts, travel, accommodation, services, meals and entertainment, cash, cash equivalents (gift cards, coupons, or vouchers), prizes from external competitors or lotteries, and any other similar item, event or benefit.

It is NEVER acceptable to:

- (1). Provide Business Courtesies to improperly influence or bribe anyone, whether a Government Official or a commercial business partner such as a customer, intermediary, or supplier;
- (2). Receive Business Courtesies that will unduly affect a Honeywell employee's independent judgment;
- (3). Provide or receive Business Courtesies in exchange for any improper favor or benefit;
- (4). Offer or receive gifts of cash;
- (5). Offer or receive gifts of cash equivalents (gift cards, coupons, or vouchers) without prior consent from the Integrity & Compliance Department or
- (6). Provide or direct through a channel, Business Courtesies that would otherwise require Honeywell approval.

All Business Courtesies given to or received from Third Parties MUST comply with the following general principles:

- (1). Must be in connection with a legitimate business purpose;
- (2). Must not be lavish, extravagant, or create an obligation for the recipient under the circumstances considering the type, value, and frequency;
- (3). Must comply with local law;
- (4). Must comply with customer contractual provisions, should not violate the recipients' policies or procedures, and should be avoided or undertaken with additional care during sensitive commercial periods such as contract negotiations or tendering; and
- (5). Must not be solicited by the recipient or involve family members or close friends of the recipient.

If the Business Courtesies meet the above general principles, Honeywell employees need to determine whether pre-approval is required based on certain thresholds. Local laws impose strict limits on Business Courtesies to Government Officials, so it is important to always check with the Integrity and Compliance Department if any limits apply.

If any Business Courtesy does not meet the above general principles, Honeywell employees cannot provide or accept it regardless of the value.

## **ENTERING INTO JOINT VENTURES OR JOINT BIDDING ARRANGEMENTS**

Anti-corruption risk-based due diligence must be completed before a JV or JBA is formed.

Directors, representatives, and any other employee working for any JV or JBA have additional obligations to ensure Honeywell compliance requirements are met based on the Policy.



# **RECRUITMENT OF HIGH-RISK CANDIDATES**

A High-Risk Candidate refers to current and former Government Officials, a referral or nominee of Government Official, or a candidate with ethical flags identified during the recruitment and background check process.

Before recruiting High-Risk Candidates, employees must contact HR, the SBU General Counsel or the General Counsel for Anticorruption for review and approval.

# **CHARITABLE CONTRIBUTIONS AND SPONSORSHIPS**

All charitable contributions and sponsorships must be in line with applicable laws and Honeywell policies and should be recorded accurately in Honeywell's books and records.

Pre-approval is required from the Integrity and Compliance Department for charitable contributions and sponsorships that exceed USD \$10,000 and have a government nexus. A government nexus occurs when the charitable contribution or sponsorship may benefit or implicate a Government Official or were solicited or requested by a Government Official.

# **ANTICORRUPTION RECORDKEEPING REQUIREMENTS**

All employees must keep accurate books and records for all expenses, payments, and other business, and comply with applicable policies regarding recordkeeping.

# **MANAGING INCIDENTS AND REPORTING A CONCERN**

Employees have a responsibility to report violations or suspected violations of this Policy through the various reporting methods: the Law Department, his or her manager, a local Ethics Ambassador, the Integrity and Compliance Department, the ACCESS Integrity Helpline (800-237-5982) or email ([access.integrity.helpline@honeywell.com](mailto:access.integrity.helpline@honeywell.com)).

All allegations will be addressed confidentially, impartially, and in a timely manner and Honeywell will protect from retaliation anyone who reports in good faith suspected violations of this Policy or who participates in an investigation.

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