Honeywell

TITLE : VIGIL MECHANISM (WHISTLE BLOWER POLICY)

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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 Business Conduct Leaders (BCLs)
- 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

You may make a report using The ACCESS Integrity Helpline which 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:

 Calling India No: 000-117 followed by 8558306521 (from mobile) OR +1-800-237-5982
EMAILING: AccessIntegrityHelpline@Honeywell.com or
WRITING: Honeywell International Inc. Attention: ACCESS Helpline, 115 Tabor Road Morris Plains, New Jersey 07950

You may refer to the Integrity and Compliance website at: http://go.honeywell.com/ AccessIntegrityHelpline for a listing of additional country-specific helpline numbers.

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. Appropriate corrective or disciplinary action for Code violations will be taken whenever necessary.

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