

## DEFENCE COMPANIES INDEX (DCI) ON ANTI-CORRUPTION AND CORPORATE TRANSPARENCY 2020

### FINAL ASSESSMENT

#### HONEYWELL INTERNATIONAL INC.

The following pages contain the detailed scoring for this company based on publicly available information.

The table below shows a summary of the company's scores per section:

Section	Number of Questions*	Score Based on Publicly Available Information
1. Leadership and Organisational Culture	4	6/8
2. Internal Controls	6	4/12
3. Support to Employees	7	4/14
4. Conflict of Interest	4	4/8
5. Customer Engagement	7	7/14
6. Supply Chain Management	5	5/10
7. Agents, Intermediaries and Joint Ventures	10	5/20
8. Offsets	4	0/8
9. High Risk Markets	4	3/8
10. State-Owned Enterprises	0	N/A
<b>TOTAL</b>		<b>38/102</b>
<b>BAND</b>		<b>D</b>

\*This column represents the number of questions on which the company was eligible to receive a score; i.e. where the company did not receive a score of N/A.

## 1. Leadership and Organisational Culture

Question
<p><b>1.1. Does the company have a publicly stated anti-bribery and corruption commitment, which is authorised by its leadership?</b></p>
Score
<p>1</p>
Comments
<p>There is evidence that the company has a publicly stated commitment to integrity, compliance and high ethical standards which is authorised and endorsed by the company’s Chairman and CEO, Darius Adamczyk. This commitment appears at the start of the company’s Code of Business Conduct, which addresses bribery and improper payments as a specific risk. The company receives a score of ‘1’ because there is no evidence that the company’s senior leadership makes a clear and direct statement on anti-bribery and corruption.</p>
Evidence
<p><b>[1] Code of Business Conduct (Updated 2018) (Document)</b>  <b>Accessed 31/05/2019</b>  <a href="https://www.honeywell.com/content/dam/honeywell/files/code-of-conduct/Code_of_Business_Conduct_2018_English%20pdf.pdf">https://www.honeywell.com/content/dam/honeywell/files/code-of-conduct/Code_of_Business_Conduct_2018_English%20pdf.pdf</a></p> <p>[p.1] Letter from Our Chairman and CEO          As Honeywell continues to grow, we must stay focused on our commitment to integrity and compliance, respect, diversity, and inclusion. Our Code of Business Conduct is a roadmap to help you navigate the operating environments in our businesses, which include some of the most dynamic sectors of the global connected economy.</p> <p>Our integrity helps ensure that we continue to sustain the credibility of our brand, maintain our strong reputation, and build on our track record of growth and performance. Take the time to read through Honeywell’s Code and understand the guidance. If you have any questions about our Code, or need help understanding how it applies to the work you do, seek advice from any of the resources listed. Our Company will never tolerate retaliation against anyone for asking questions or raising concerns in good faith, so you should always feel comfortable coming forward. It also is our expectation that if you observe any of your colleagues not following the Code, you should report your concerns immediately through one of the reporting channels.</p> <p>I’m counting on you to uphold our continued commitment to integrity and ethics at Honeywell.</p> <p>Darius Adamczyk</p> <p>[p.7] Honeywell’s 8 Behaviors          Honeywell expects all employees to act with integrity and to comply fully with the Code of Business Conduct. Our commitment to integrity and ethics, respect, and diversity and inclusion are fundamental expectations of working at Honeywell.</p> <p>[p.38] No Commercial Bribery and No Improper Payments to Government Officials          We should not solicit, give, or receive commercial bribes or unlawful kickbacks. We should also be careful to avoid even the appearance of such improper conduct. “Commercial bribery” generally includes any situation where a Honeywell employee or someone acting on Honeywell’s behalf offers or gives something of value with the intent to improperly influence a business action or decision. Unlawful “kickbacks” generally include any situation where an employee receives an improper personal benefit in exchange for taking or refraining from taking an action on behalf of Honeywell. Honeywell will not tolerate commercial bribery or unlawful kickbacks, whether it is done directly or through a third party.</p> <p>In addition to avoiding commercial bribery and unlawful kickbacks, we comply with all applicable anticorruption laws regarding improper payments to government officials. “Improper payments” include both direct and indirect</p>

payments, or an offer, promise or authorization of a payment or anything of value to a government official for purposes of improperly influencing government acts or decisions in order to obtain or retain business or otherwise secure a business advantage. Note that improper payments can take the form of cash, gifts, or lavish entertainment.

**[2] Anti-Corruption Policy - Highlights (updated 2018) (Document)**

**Accessed 31/05/2019**

<https://www.honeywell.com/content/dam/honeywell/files/code-of-conduct/Anticorruption%20Policy%202066%20pdf.pdf>

[p.2] Honeywell's Anticorruption Policy 2066 (Policy) and the Honeywell's Code of Business Conduct prohibit bribery in any form.

**[3] Integrity and Compliance (Webpage)**

**Accessed 31/05/2019**

<https://www.honeywell.com/content/honeywell/us/en/company/integrity-and-compliance>

At Honeywell, we have a responsibility to conduct ourselves with the highest levels of integrity in everything we do. This helps us sustain the credibility of our brand, maintain our strong reputation, and build on our track record of growth and performance. From the shop floor to the boardroom, all Honeywell employees and representatives are held to the highest standard—and we cultivate a culture of not just meeting, but exceeding all laws and regulations in the countries where we do business.

<b>Question</b>
<p><b>1.2. Does the company have a comprehensive anti-bribery and corruption policy that explicitly applies to both of the following categories:</b></p> <p><b>a) All employees, including staff and leadership of subsidiaries and other controlled entities;</b></p> <p><b>b) All board members, including non-executive directors.</b></p>
<b>Score</b>
<b>2</b>
<b>Comments</b>
<p>Based on publicly available information, there is evidence that the company has a Code of Business Conduct which prohibits bribery, commercial bribery and improper payments to public officials. The company also publishes highlights of its Anti-Corruption Policy, which prohibits facilitation payments. There is evidence that the Code of Business Conduct applies to all employees and directors of the company, while the Anti-Corruption Policy applies to all employees, including those employed by subsidiaries and other controlled entities.</p>
<b>Evidence</b>
<p><b>[2] Anti-Corruption Policy - Highlights (updated 2018) (Document)</b>  <b>Accessed 31/05/2019</b>  <a href="https://www.honeywell.com/content/dam/honeywell/files/code-of-conduct/Anticorruption%20Policy%202066%20pdf.pdf">https://www.honeywell.com/content/dam/honeywell/files/code-of-conduct/Anticorruption%20Policy%202066%20pdf.pdf</a>                  [p.3] 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.</p> <p>[p.5] 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.</p> <p><b>[1] Code of Business Conduct (Updated 2018) (Document)</b>  <b>Accessed 31/05/2019</b>  <a href="https://www.honeywell.com/content/dam/honeywell/files/code-of-conduct/Code_of_Business_Conduct_2018_English%20pdf.pdf">https://www.honeywell.com/content/dam/honeywell/files/code-of-conduct/Code_of_Business_Conduct_2018_English%20pdf.pdf</a>                  [p.12] Who Must Follow Our Code                  Our Code applies to all employees, officers and directors of Honeywell. Where appropriate, business partners working on our Company’s behalf should also familiarize themselves with and follow our Code. If your job responsibilities require you to interact with representatives working on behalf of Honeywell, be sure to inform them of their responsibility to act in accordance with this Code and provide them with a copy. Their behavior must be consistent with our Code, other Honeywell policies, and applicable laws and regulations.</p> <p>[p.35] No Commercial Bribery and No Improper Payments to Government Officials                  We should not solicit, give, or receive commercial bribes or unlawful kickbacks. We should also be careful to avoid even the appearance of such improper conduct. “Commercial bribery” generally includes any situation where a Honeywell employee or someone acting on Honeywell’s behalf offers or gives something of value with the intent to improperly influence a business action or decision. Unlawful “kickbacks” generally include any situation where an employee receives an improper personal benefit in exchange for taking or refraining from taking an action on behalf of Honeywell. Honeywell will not tolerate commercial bribery or unlawful kickbacks, whether it is done directly or through a third party.</p> <p>In addition to avoiding commercial bribery and unlawful kickbacks, we comply with all applicable anticorruption laws regarding improper payments to government officials. “Improper payments” include both direct and indirect payments, or an offer, promise or authorization of a payment or anything of value to a government official for purposes of improperly influencing government acts or decisions in order to obtain or retain business or otherwise secure a business advantage. Note that improper payments can take the form of cash, gifts, or lavish entertainment. “Government officials” include officials of government entities, international organizations and political parties, employees of state-owned companies, and even employees of government-owned or controlled companies and joint venture partners. Honeywell prohibits improper payments to government officials. It is</p>

important to remember that engaging in bribery, or even appearing to engage in such activity, can expose you and our Company to criminal liability.

Never retain a third party to make an improper payment to a government official or enter into any transaction where you suspect a third party is making such payments. Doing so violates our Code and anticorruption laws. We must carefully screen all third parties using our due diligence procedures before retaining them. For more information please see our Anticorruption Policy.

**[16] Proxy Statement 2018 (Document)**  
**Accessed 02/06/2019**

<http://investor.honeywell.com/Interactive/newlookandfeel/4121346/proxy-2018/images/Honeywell-Proxy2018.pdf>

**[p.15] GOVERNANCE BEST PRACTICES Board Practices and Procedures**

Honeywell's Code of Business Conduct applies to all directors, officers (including the Chief Executive Officer, Chief Financial Officer and Controller) and employees. Amendments to or waivers of the Code of Business Conduct granted to any of Honeywell's directors and executive officers will be published on our website.

**[3] Integrity and Compliance (Webpage)**  
**Accessed 31/05/2019**

<https://www.honeywell.com/content/honeywell/us/en/company/integrity-and-compliance>

At Honeywell, we have a responsibility to conduct ourselves with the highest levels of integrity in everything we do. This helps us sustain the credibility of our brand, maintain our strong reputation, and build on our track record of growth and performance. From the shop floor to the boardroom, all Honeywell employees and representatives are held to the highest standard—and we cultivate a culture of not just meeting, but exceeding all laws and regulations in the countries where we do business.

For more information, see the “No Commercial Bribery and No Improper Payments to Government Officials” section of our Code and our policies on Business Courtesies for U.S. Government Officials, Government Relations, and Anticorruption.

<b>Question</b>
<b>1.3. Does the board or a dedicated board committee provide oversight of the company's anti-bribery and corruption programme?</b>
<b>Score</b>
<b>2</b>
<b>Comments</b>
<p>There is evidence that the company's Corporate Governance and Responsibility Committee is accountable to the board for oversight of the Code of Business Conduct, which outlines the company's anti-bribery and corruption stance and wider compliance programme. This committee's functions include monitoring and reviewing reports on adherence to the code of conduct and the performance of the compliance programme.</p> <p>In addition, there is evidence that both the Corporate Governance and Responsibility Committee and the Audit Committee engage in formal oversight functions relating to compliance with ethics and integrity, including reviewing audits and formal reports on the company's compliance activities. There is evidence that these bodies have the authority to require that any necessary changes to the programme are made.</p>
<b>Evidence</b>
<p><b>[4] Governance Guidelines 2019 (webpage)</b>  <b>Accessed 31/05/2019</b>  <a href="http://investor.honeywell.com/IRW/CustomPage/4121346/Index?KeyGenPage=324757">http://investor.honeywell.com/IRW/CustomPage/4121346/Index?KeyGenPage=324757</a>  Board Functions and Responsibilities  The primary functions of the Honeywell International Inc. Board of Directors (the "Board") are to oversee management performance on behalf of the shareowners, to ensure that the long-term interests of the shareowners are being served, to monitor adherence to Honeywell standards and policies, to promote the exercise of responsible corporate citizenship, and generally to perform the duties and responsibilities assigned to the Board by the laws of Delaware, the state of incorporation of the Company.</p> <p>The Board fulfils these functions by, among other things:</p> <ul style="list-style-type: none"> <li>• Reviewing assessments of, and advising management with respect to, significant risks and issues facing the Company; and</li> <li>• Ensuring the establishment of, and monitoring compliance with, processes designed to ensure the integrity of the Company's actions, including its financial statements and financial reporting, its relationships with customers, suppliers and other constituencies, and its compliance with law and its Code of Conduct.</li> </ul> <p><b>[5] Corporate Governance and Responsibility Committee Charter 2019</b>  <b>Accessed 31/05/2019</b>  <a href="http://investor.honeywell.com/Cache/1001206974.PDF?O=PDF&amp;T=&amp;Y=&amp;D=&amp;FID=1001206974&amp;iid=4121346">http://investor.honeywell.com/Cache/1001206974.PDF?O=PDF&amp;T=&amp;Y=&amp;D=&amp;FID=1001206974&amp;iid=4121346</a>  [p.1] Purpose  (3) lead the Board in its annual review of the performance of the Board and its committees;  [...]  (5) review the Company's policies and programs relating to compliance with its Code of Business Conduct, health, safety and environmental matters, equal employment opportunity and such other matters as may be brought to the attention of the Committee regarding the Company's role as a responsible corporate citizen.</p> <p>[p.2] Responsibilities  The Corporate Governance &amp; Responsibility Committee shall:  [...]  4. Receive comments from all Directors, and report annually to the Board with an assessment of the performance of the Board and its committees and recommendations for improvements, which review shall be discussed with the full Board.</p> <p>5. Review and reassess the adequacy of the Corporate Governance Guidelines of the Company and recommend any proposed changes to the Board for approval.</p>

- 6. Review and report to the Board on the Company's policies and programs relating to health, safety and environmental matters, equal employment opportunity and such other matters, including the Company's Code of Business Conduct, as may be brought to the attention of the Committee regarding the Company's role as a responsible corporate citizen.
- 7. Report regularly to the Board of Directors of the Company and perform such other functions as may be assigned to it from time to time by the Board or its Chairman.
- 8. Form and delegate authority to subcommittees where appropriate.
- 9. Undertake an annual performance evaluation of the activities of the Committee, including the Committee's responsibilities as set forth above.

**[6] Audit Committee Charter 2019**  
**Accessed 31/05/2019**

<http://investor.honeywell.com/Cache/1500113540.PDF?O=PDF&T=&Y=&D=&FID=1500113540&iid=4121346>

[p.3] Responsibilities

The following shall be the primary activities of the Committee in carrying out its oversight responsibilities. The Committee may, from time to time, alter its procedures as appropriate given the circumstances and shall perform such other functions as may be assigned to it by law, the Company's charter, the By-laws or by the Board.

- 16. Review, approve and thereby establish procedures for the receipt, retention and treatment of complaints received by the Company regarding accounting, internal accounting controls or auditing matters and for the confidential, anonymous submission by employees of concerns regarding questionable accounting or auditing matters. Review at least quarterly the Company's significant accounting, internal control and other integrity and compliance investigations.
- 17. Review material legal and compliance matters involving the Company periodically with the Company's Senior Vice President and General Counsel and the Vice President – Global Compliance, it being understood that each such individual has express authority to communicate personally with the Chair of the Audit Committee about any such matter as appropriate.
- 18. Review with the Company's Vice President – Global Compliance, at least annually, the implementation and effectiveness of the Company's integrity and compliance program and related matters.

**[7] Board Committees (Webpage)**  
**Accessed 31/05/2019**

<http://investor.honeywell.com/Board-Committees>

	Audit Committee	Corporate Governance and Responsibility Committee	Management Development and Compensation Committee
Financial Releases			
+ SEC Filings and Reports	Duncan B. Angove		
- Corporate Governance	William S. Ayer		
Governance Home			
Board of Directors	Kevin Burke		
Board Committees	D. Scott Davis	<sup>S</sup>	Chair
Leadership	Linnet F. Deily		Chair
Governance Guidelines	Judd A. Gregg		
Governance Documents	Clive R. Hollick		
Code of Conduct	Grace D. Lieblein		
Political Contributions	Jaime Chico Pardo*	<i>ex officio</i>	<i>ex officio</i>
Sustainability	George Paz	Chair <sup>S</sup>	
+ Financial Information	Robin L. Washington	<sup>S</sup>	
+ Investor Resources			

= Member <sup>S</sup> = Financial Expert

\*Lead Director



<b>Question</b>																																																
<b>1.4. Is responsibility for implementing and managing the company’s anti-bribery and corruption programme ultimately assigned to a senior executive, and does he or she have a direct reporting line to the board or board committee providing oversight of the company’s programme?</b>																																																
<b>Score</b>																																																
<b>1</b>																																																
<b>Comments</b>																																																
<p>There is some evidence to indicate that a specific managerial-level individual – the Vice President Global Compliance – has ultimate responsibility for implementing and managing the company’s anti-bribery and corruption programme.</p> <p>However, the company receives a score of ‘1’ because it is not clear that this individual is a senior executive, nor is there evidence of clear reporting and feedback between this individual and the board.</p>																																																
<b>Evidence</b>																																																
<p><b>[5] Corporate Governance and Responsibility Committee Charter 2019 (Document)</b>  <b>Accessed 31/05/2019</b>  <a href="http://investor.honeywell.com/Cache/1001206974.PDF?O=PDF&amp;T=&amp;Y=&amp;D=&amp;FID=1001206974&amp;iid=4121346">http://investor.honeywell.com/Cache/1001206974.PDF?O=PDF&amp;T=&amp;Y=&amp;D=&amp;FID=1001206974&amp;iid=4121346</a>                  [p.2] Responsibilities                  4. Receive comments from all Directors, and report annually to the Board with an assessment of the performance of the Board and its committees and recommendations for improvements, which review shall be discussed with the full Board.</p> <p><b>[6] Audit Committee Charter 2019</b>  <b>Accessed 31/05/2019</b>  <a href="http://investor.honeywell.com/Cache/1500113540.PDF?O=PDF&amp;T=&amp;Y=&amp;D=&amp;FID=1500113540&amp;iid=4121346">http://investor.honeywell.com/Cache/1500113540.PDF?O=PDF&amp;T=&amp;Y=&amp;D=&amp;FID=1500113540&amp;iid=4121346</a>                  [p.3] 17. Review material legal and compliance matters involving the Company periodically with the Company’s Senior Vice President and General Counsel and the Vice President – Global Compliance, it being understood that each such individual has express authority to communicate personally with the Chair of the Audit Committee about any such matter as appropriate.</p> <p>18. Review with the Company’s Vice President – Global Compliance, at least annually, the implementation and effectiveness of the Company’s integrity and compliance program and related matters.</p> <p><b>[7] Board Committees (Webpage)</b>  <b>Accessed 31/05/2019</b>  <a href="http://investor.honeywell.com/Board-Committees">http://investor.honeywell.com/Board-Committees</a></p> <table border="1"> <thead> <tr> <th></th> <th>Audit Committee</th> <th>Corporate Governance and Responsibility Committee</th> <th>Management Development and Compensation Committee</th> </tr> </thead> <tbody> <tr> <td>Duncan B. Angove</td> <td></td> <td></td> <td>Member</td> </tr> <tr> <td>William S. Ayer</td> <td></td> <td>Member</td> <td>Member</td> </tr> <tr> <td>Kevin Burke</td> <td>Member</td> <td></td> <td></td> </tr> <tr> <td>D. Scott Davis</td> <td>Member<sup>S</sup></td> <td></td> <td>Chair</td> </tr> <tr> <td>Linnet F. Deily</td> <td>Member</td> <td>Chair</td> <td></td> </tr> <tr> <td>Judd A. Gregg</td> <td>Member</td> <td>Member</td> <td></td> </tr> <tr> <td>Clive R. Hollick</td> <td></td> <td></td> <td>Member</td> </tr> <tr> <td>Grace D. Lieblein</td> <td></td> <td>Member</td> <td>Member</td> </tr> <tr> <td>Jaime Chico Pardo*</td> <td><i>ex officio</i></td> <td>Member</td> <td><i>ex officio</i></td> </tr> <tr> <td>George Paz</td> <td>Chair<sup>S</sup></td> <td>Member</td> <td></td> </tr> <tr> <td>Robin L. Washington</td> <td>Member<sup>S</sup></td> <td></td> <td></td> </tr> </tbody> </table> <p>Member = Member S = Financial Expert                  *Lead Director</p>		Audit Committee	Corporate Governance and Responsibility Committee	Management Development and Compensation Committee	Duncan B. Angove			Member	William S. Ayer		Member	Member	Kevin Burke	Member			D. Scott Davis	Member <sup>S</sup>		Chair	Linnet F. Deily	Member	Chair		Judd A. Gregg	Member	Member		Clive R. Hollick			Member	Grace D. Lieblein		Member	Member	Jaime Chico Pardo*	<i>ex officio</i>	Member	<i>ex officio</i>	George Paz	Chair <sup>S</sup>	Member		Robin L. Washington	Member <sup>S</sup>		
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## 2. Internal Controls

<b>Question</b>
<b>2.1. Is the design and implementation of the anti-bribery and corruption programme tailored to the company based on an assessment of the corruption and bribery risks it faces?</b>
<b>Score</b>
<b>1</b>
<b>Comments</b>
<p>There is evidence that the company has formal procedures in place to conduct risk assessments on its operations which covers commercial, strategic, legal, compliance and reputational risks. There is some indication that these risks include ethics and anti-corruption as part of compliance. There is also evidence that both the Audit Committee and the Board review the results of these assessments on an annual basis.</p> <p>However, the company receives a score of ‘1’ because it is not clear from publicly available evidence that the results of such risk assessments are used to inform the company’s anti-bribery and corruption programme.</p>
<b>Evidence</b>
<p><b>[16] Proxy Statement 2018 (Document)</b>  <b>Accessed 02/06/2019</b>  <a href="http://investor.honeywell.com/Interactive/newlookandfeel/4121346/proxy-2018/images/Honeywell-Proxy2018.pdf">http://investor.honeywell.com/Interactive/newlookandfeel/4121346/proxy-2018/images/Honeywell-Proxy2018.pdf</a>                      [p.20] BOARD’S ROLE IN RISK OVERSIGHT</p> <p>While senior management has primary responsibility for managing risk, the Board as a whole has responsibility for risk oversight. Relevant Board Committees review specific risk areas, as enumerated below, and report on their deliberations to the Board. The full Board oversees risk in several ways. Through regular updates on the financial and operating results of Honeywell, as well as the annual operating and five-year strategic plans of each Strategic Business Group (“SBG”), management provides the Board with its view of the key commercial and strategic risks faced by each business unit. During those presentations, the Board is able to provide management with feedback on whether management has identified the key risks and is taking appropriate actions to mitigate risk. In addition, management reports to the Board and each Committee periodically on specific, material risks as they arise or as requested by individual Board members.</p> <p>In addition, the Board uses the Enterprise Risk Management or ERM program as a key tool for understanding the inherent risks facing Honeywell as well as assessing whether management’s processes, procedures and practices for mitigating those risks are effective. Both the Audit Committee and full Board review the results of the annual ERM assessment. Honeywell’s CFO and General Counsel jointly present the results of the ERM assessment and the presentations are designed to provide full visibility into the risks facing Honeywell and how management is mitigating those risks, thereby enabling the Board to effectively exercise its oversight function. The ERM assessment deployed by management is robust, based on both an enterprise-wide “top down” and “bottom up” view of commercial, strategic, legal, compliance, cyber and reputational risks and strategies for mitigating those risks.</p> <p>In addition, every three years one-on-one meetings are held with each Board member and the CFO, General Counsel, Controller and Vice President, Internal Audit to solicit feedback on Honeywell’s ERM process to ensure that the universe of risks and how management ranks those risks, in terms of likelihood of occurrence and financial impact, is both realistic and appropriate. Feedback from the one-on-one interviews with the individual Board member is presented to the full Board and incorporated in our ERM program and risk mitigation efforts. In 2018, one-on-one interviews will be scheduled with each Board member.</p> <p><b>[5] Corporate Governance and Responsibility Committee Charter 2019</b>  <b>Accessed 31/05/2019</b>  <a href="http://investor.honeywell.com/Cache/1001206974.PDF?O=PDF&amp;T=&amp;Y=&amp;D=&amp;FID=1001206974&amp;iid=4121346">http://investor.honeywell.com/Cache/1001206974.PDF?O=PDF&amp;T=&amp;Y=&amp;D=&amp;FID=1001206974&amp;iid=4121346</a>                      [p.1] Purpose</p>

(5) review the Company's policies and programs relating to compliance with its Code of Business Conduct, health, safety and environmental matters, equal employment opportunity and such other matters as may be brought to the attention of the Committee regarding the Company's role as a responsible corporate citizen.

[p.2] Responsibilities

5. Review and reassess the adequacy of the Corporate Governance Guidelines of the Company and recommend any proposed changes to the Board for approval.

6. Review and report to the Board on the Company's policies and programs relating to health, safety and environmental matters, equal employment opportunity and such other matters, including the Company's Code of Business Conduct, as may be brought to the attention of the Committee regarding the Company's role as a responsible corporate citizen.

7. Report regularly to the Board of Directors of the Company and perform such other functions as may be assigned to it from time to time by the Board or its Chairman.

[...]

9. Undertake an annual performance evaluation of the activities of the Committee, including the Committee's responsibilities as set forth above.

**[6] Audit Committee Charter 2019 (Document)**

**Accessed 31/05/2019**

<http://investor.honeywell.com/Cache/1500113540.PDF?O=PDF&T=&Y=&D=&FID=1500113540&iid=4121346>

[p.3] Responsibilities

17. Review material legal and compliance matters involving the Company periodically with the Company's Senior Vice President and General Counsel and the Vice President – Global Compliance, it being understood that each such individual has express authority to communicate personally with the Chair of the Audit Committee about any such matter as appropriate.

18. Review with the Company's Vice President – Global Compliance, at least annually, the implementation and effectiveness of the Company's integrity and compliance program and related matters.

<b>Question</b>
<b>2.2. Is the company's anti-bribery and corruption programme subject to regular internal or external audit, and are policies and procedures updated according to audit recommendations?</b>
<b>Score</b>
<b>1</b>
<b>Comments</b>
<p>There is evidence that the company reviews its internal procedures to identify legal and compliance risks on an annual basis, and there is also some evidence that the company's Code of Business Conduct is reviewed on a regular basis. There is also evidence that the Board and Audit Committee are involved in this review process.</p> <p>However, the company receives a score of '1' because it is not clear from publicly available information that the company's internal procedures – including its anti-bribery and corruption programme – are subject to internal audit or similar assurance process to ensure that the programme is consistent with best practice and to update the policies accordingly.</p>
<b>Evidence</b>
<p><b>[16] Proxy Statement 2018 (Document)</b>  <b>Accessed 02/06/2019</b>  <a href="http://investor.honeywell.com/Interactive/newlookandfeel/4121346/proxy-2018/images/Honeywell-Proxy2018.pdf">http://investor.honeywell.com/Interactive/newlookandfeel/4121346/proxy-2018/images/Honeywell-Proxy2018.pdf</a>  [p.20] BOARD'S ROLE IN RISK OVERSIGHT  While senior management has primary responsibility for managing risk, the Board as a whole has responsibility for risk oversight. Relevant Board Committees review specific risk areas, as enumerated below, and report on their deliberations to the Board. The full Board oversees risk in several ways. Through regular updates on the financial and operating results of Honeywell, as well as the annual operating and five-year strategic plans of each Strategic Business Group ("SBG"), management provides the Board with its view of the key commercial and strategic risks faced by each business unit. During those presentations, the Board is able to provide management with feedback on whether management has identified the key risks and is taking appropriate actions to mitigate risk. In addition, management reports to the Board and each Committee periodically on specific, material risks as they arise or as requested by individual Board members.</p> <p>In addition, the Board uses the Enterprise Risk Management or ERM program as a key tool for understanding the inherent risks facing Honeywell as well as assessing whether management's processes, procedures and practices for mitigating those risks are effective. Both the Audit Committee and full Board review the results of the annual ERM assessment. Honeywell's CFO and General Counsel jointly present the results of the ERM assessment and the presentations are designed to provide full visibility into the risks facing Honeywell and how management is mitigating those risks, thereby enabling the Board to effectively exercise its oversight function. The ERM assessment deployed by management is robust, based on both an enterprise-wide "top down" and "bottom up" view of commercial, strategic, legal, compliance, cyber and reputational risks and strategies for mitigating those risks.</p> <p>In addition, every three years one-on-one meetings are held with each Board member and the CFO, General Counsel, Controller and Vice President, Internal Audit to solicit feedback on Honeywell's ERM process to ensure that the universe of risks and how management ranks those risks, in terms of likelihood of occurrence and financial impact, is both realistic and appropriate. Feedback from the one-on-one interviews with the individual Board member is presented to the full Board and incorporated in our ERM program and risk mitigation efforts. In 2018, one-on-one interviews will be scheduled with each Board member.</p> <p><b>[5] Corporate Governance and Responsibility Committee Charter 2019</b>  <b>Accessed 31/05/2019</b>  <a href="http://investor.honeywell.com/Cache/1001206974.PDF?O=PDF&amp;T=&amp;Y=&amp;D=&amp;FID=1001206974&amp;iid=4121346">http://investor.honeywell.com/Cache/1001206974.PDF?O=PDF&amp;T=&amp;Y=&amp;D=&amp;FID=1001206974&amp;iid=4121346</a>  [p.2] Responsibilities  6. Review and report to the Board on the Company's policies and programs relating to health, safety and environmental matters, equal employment opportunity and such other matters, including the Company's Code of Business Conduct, as may be brought to the attention of the Committee regarding the Company's role as a responsible corporate citizen.</p>

**[6] Audit Committee Charter 2019**

**Accessed 31/05/2019**

<http://investor.honeywell.com/Cache/1500113540.PDF?O=PDF&T=&Y=&D=&FID=1500113540&iid=4121346>

[p.1] Purpose

The Committee shall provide assistance to the Board of Directors in fulfilling its responsibilities relating to oversight of

- (i) the Company's accounting and financial reporting practices and internal control system,
- (ii) the independent auditor's qualifications and independence,
- (iii) the performance of the Company's internal audit function and independent auditor, and
- (iv) compliance with legal and regulatory requirements.

[p.3] 13. Review, in consultation with the independent auditor and the chief internal auditor, the scope and plan of forthcoming external and internal audits (including areas to be examined, the adequacy of personnel to be assigned to the audits, other factors that may affect the audit timeline, and audit procedures), the involvement of the internal auditors in the audit examination, and the independent auditor's responsibility under generally accepted auditing standards.

14. Discuss the Company's policies with respect to risk assessment and risk management, including the Company's risk assessment policies, major financial risks and enterprise exposures (including cybersecurity risks) and steps taken to monitor, control and respond to such exposures.

18. Review with the Company's Vice President – Global Compliance, at least annually, the implementation and effectiveness of the Company's integrity and compliance program and related matters.

<b>Question</b>
<b>2.3. Does the company have a system for tracking, investigating and responding to bribery and corruption allegations or incidents, including those reported through whistleblowing channels?</b>
<b>Score</b>
<b>1</b>
<b>Comments</b>
<p>There is evidence that the company publicly commits to investigating bribery and corruption allegations and/or incidents, and that there are procedures in place to track, investigate and respond to such concerns through the Integrity and Compliance programme. In addition, there is evidence that the Audit Committee is responsible for reviewing all significant integrity and compliance investigations on a quarterly basis.</p> <p>However, the company receives a score of '1' because it does not provide further publicly available information on its investigative procedures from receipt to outcome, with ownership and actions to be taken at each step. There is also no evidence that information on each investigation is documented, nor that the company clearly commits to ensure that whistleblowers are informed of the outcome, if they so wish.</p>
<b>Evidence</b>
<p><b>[16] Proxy Statement 2018 (Document)</b>  <b>Accessed 02/06/2019</b>  <a href="http://investor.honeywell.com/Interactive/newlookandfeel/4121346/proxy-2018/images/Honeywell-Proxy2018.pdf">http://investor.honeywell.com/Interactive/newlookandfeel/4121346/proxy-2018/images/Honeywell-Proxy2018.pdf</a>  <p>[p.2] <u>Honeywell's Integrity and Compliance Program</u>  In addition to the Code, Honeywell's Integrity and Compliance program provides comprehensive training on key compliance topics, develops training scenarios, provides mechanisms for employees and third parties to report concerns, and ensures timely and fair reviews of integrity and compliance concerns through a best-in-class process to report and investigate Code of Business Conduct concerns.</p> <p><b>[2] Anti-Corruption Policy - Highlights (updated 2018) (Document)</b>  <b>Accessed 31/05/2019</b>  <a href="https://www.honeywell.com/content/dam/honeywell/files/code-of-conduct/Anticorruption%20Policy%202066%20pdf.pdf">https://www.honeywell.com/content/dam/honeywell/files/code-of-conduct/Anticorruption%20Policy%202066%20pdf.pdf</a>  <p>[p.5] <u>Raising Concerns</u>  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.</p> <p><b>[6] Audit Committee Charter 2019 (Document)</b>  <b>Accessed 31/05/2019</b>  <a href="http://investor.honeywell.com/Cache/1500113540.PDF?O=PDF&amp;T=&amp;Y=&amp;D=&amp;FID=1500113540&amp;iid=4121346">http://investor.honeywell.com/Cache/1500113540.PDF?O=PDF&amp;T=&amp;Y=&amp;D=&amp;FID=1500113540&amp;iid=4121346</a>  <u>Responsibilities</u>  <p>[p.3] 16. Review, approve and thereby establish procedures for the receipt, retention and treatment of complaints received by the Company regarding accounting, internal accounting controls or auditing matters and for the confidential, anonymous submission by employees of concerns regarding questionable accounting or auditing matters. Review at least quarterly the Company's significant accounting, internal control and other integrity and compliance investigations.</p> <p><b>[1] Code of Business Conduct (Updated 2018) (Document)</b>  <b>Accessed 31/05/2019</b>  <a href="https://www.honeywell.com/content/dam/honeywell/files/code-of-conduct/Code_of_Business_Conduct_2018_English%20pdf.pdf">https://www.honeywell.com/content/dam/honeywell/files/code-of-conduct/Code_of_Business_Conduct_2018_English%20pdf.pdf</a>  <p>[p.14] <u>Asking For And Voicing Concerns</u>  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:</p> </p></p></p></p>

- Your manager or supervisor
- Your Human Resource representative
- Your Integrity and Compliance Representatives (I&C Reps) and Ethics Ambassadors
- 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

The ACCESS Integrity Helpline 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: 800-237-5982, or refer to the Integrity and Compliance website at <http://go.honeywell.com/AccessIntegrityHelpline> for a listing of additional country-specific helpline numbers.

You may also report issues by mail or email to: Honeywell International Inc. Attention: ACCESS Helpline 115 Tabor Road Morris Plains, New Jersey 07950 [access.integrity.helpline@honeywell.com](mailto:access.integrity.helpline@honeywell.com)

[p.15] 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.

[p.15] 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.

[p.15] 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. Employees have a duty to cooperate with Company investigations concerning potential violations of the Code or applicable Company policies. Failure to cooperate fully in a Company investigation or the failure to be fully truthful when providing evidence or testimony in such investigation is grounds for disciplinary action, including termination. It should be emphasized that appropriate corrective or disciplinary action for Code violations will be taken whenever necessary.

### **[3] Integrity and Compliance (Webpage)**

**Accessed 31/05/2019**

<https://www.honeywell.com/content/honeywell/us/en/company/integrity-and-compliance>

Access Integrity Helpline

800-237-5982 (U.S.) Or report issues by mail.

The ACCESS Integrity Helpline is a 24-hour service answered by an independent third-party provider that accommodates all of the languages that our employees speak.

<b>Question</b>
<b>2.4. Does the company have appropriate arrangements in place to ensure the quality of investigations?</b>
<b>Score</b>
<b>0</b>
<b>Comments</b>
There is no publicly available evidence that the company assures itself of the quality of investigations, for example by indicating that staff conducting investigations are properly trained, by implementing a policy to handle complaints about the process or by reviewing the investigation process every three years.
<b>Evidence</b>
No evidence found.



<b>Question</b>
<b>2.5. Does the company's investigative procedure include a commitment to report material findings of bribery and corruption to the board and any criminal conduct to the relevant authorities?</b>
<b>Score</b>
1
<b>Comments</b>
<p>There is evidence that the company commits to report material findings from internal investigations to the appropriate authorities when necessary, upon the advice of the Law Department. There is some indication that the company's Senior Vice President and General Counsel reviews material matters with the Audit Committee on a regular basis, and this individual is understood to be associated with the Law Department and therefore a key individual in evaluating the decision to disclose criminal offences to the authorities when necessary.</p> <p>However, there is no clear publicly available evidence that the company commits to report material findings from investigations to the board of directors. The company's publicly available information on the reporting link between the Law Department and the Senior Vice President and General Counsel is not entirely clear.</p>
<b>Evidence</b>
<p><b>[1] Code of Business Conduct (Updated 2018) (Document)</b>  <b>Accessed 31/05/2019</b>  <a href="https://www.honeywell.com/content/dam/honeywell/files/code-of-conduct/Code_of_Business_Conduct_2018_English%20pdf.pdf">https://www.honeywell.com/content/dam/honeywell/files/code-of-conduct/Code_of_Business_Conduct_2018_English%20pdf.pdf</a>  <p>[p.15] <u>Asking for Advice and Voicing Concerns</u>  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. Employees have a duty to cooperate with Company investigations concerning potential violations of the Code or applicable Company policies. Failure to cooperate fully in a Company investigation or the failure to be fully truthful when providing evidence or testimony in such investigation is grounds for disciplinary action, including termination. It should be emphasized that appropriate corrective or disciplinary action for Code violations will be taken whenever necessary.</p> <p><b>[5] Corporate Governance and Responsibility Committee Charter 2019</b>  <b>Accessed 31/05/2019</b>  <a href="http://investor.honeywell.com/Cache/1001206974.PDF?O=PDF&amp;T=&amp;Y=&amp;D=&amp;FID=1001206974&amp;iid=4121346">http://investor.honeywell.com/Cache/1001206974.PDF?O=PDF&amp;T=&amp;Y=&amp;D=&amp;FID=1001206974&amp;iid=4121346</a>  <p>[p.2] <u>Responsibilities</u>  6. Review and report to the Board on the Company's policies and programs relating to health, safety and environmental matters, equal employment opportunity and such other matters, including the Company's Code of Business Conduct, as may be brought to the attention of the Committee regarding the Company's role as a responsible corporate citizen.</p> <p><b>[16] Proxy Statement 2018 (Document)</b>  <b>Accessed 02/06/2019</b>  <a href="http://investor.honeywell.com/Interactive/newlookandfeel/4121346/proxy-2018/images/Honeywell-Proxy2018.pdf">http://investor.honeywell.com/Interactive/newlookandfeel/4121346/proxy-2018/images/Honeywell-Proxy2018.pdf</a>  <p>[p.14] <u>GOVERNANCE BEST PRACTICES</u>  Board Practices and Procedures</p> <ul style="list-style-type: none"> <li>• The Board's Committees—Audit, Corporate Governance and Responsibility, Management Development and Compensation, and Retirement Plans—undertake extensive analysis and review of the Company's activities in key areas such as financial reporting, risk management, internal controls, compliance, corporate governance, succession planning and executive compensation.</li> <li>• The Board and its Committees perform an annual review of the agenda and topics to be considered for each meeting. During that review, each Board and Committee member is free to raise topics that are not on the agenda at any meeting and to suggest items for inclusion on future agendas.</li> </ul> <p>[p.15] • Each director is provided in advance written material to be considered at every meeting of the Board and has the opportunity to provide comments and suggestions.</p> </p></p></p>

- The Board and its Committees provide feedback to management, and management is required to answer questions raised by the directors during Board and Committee meetings.

- Each of the Lead Director and the Chair of the Corporate Governance and Responsibility Committee is permanently empowered and authorized to call special meetings of the Board at any time and for any reason.

Honeywell's Code of Business Conduct applies to all directors, officers (including the Chief Executive Officer, Chief Financial Officer and Controller) and employees. Amendments to or waivers of the Code of Business Conduct granted to any of Honeywell's directors and executive officers will be published on our website.

**[6] Audit Committee Charter 2019 (Document)**

**Accessed 31/05/2019**

<http://investor.honeywell.com/Cache/1500113540.PDF?O=PDF&T=&Y=&D=&FID=1500113540&iid=4121346>

Responsibilities

[p.3] 16. Review, approve and thereby establish procedures for the receipt, retention and treatment of complaints received by the Company regarding accounting, internal accounting controls or auditing matters and for the confidential, anonymous submission by employees of concerns regarding questionable accounting or auditing matters. Review at least quarterly the Company's significant accounting, internal control and other integrity and compliance investigations.

17. Review material legal and compliance matters involving the Company periodically with the Company's Senior Vice President and General Counsel and the Vice President – Global Compliance, it being understood that each such individual has express authority to communicate personally with the Chair of the Audit Committee about any such matter as appropriate.

<b>Question</b>
<b>2.6. Does the company publish high-level results from incident investigations and disciplinary actions against its employees?</b>
<b>Score</b>
<b>0</b>
<b>Comments</b>
There is no evidence that the company publishes data on ethical or bribery and corruption reports, investigations or disciplinary actions involving its employees.
<b>Evidence</b>
No evidence found.

### 3. Support to Employees

<b>Question</b>
<b>3.1. Does the company provide training on its anti-bribery and corruption programme to all employees across all divisions and geographies, and in all appropriate languages?</b>
<b>Score</b>
<b>1</b>
<b>Comments</b>
<p>Based on publicly available information, there is evidence that the company provides training on its anti-bribery and corruption policies. There is evidence that this training includes information on the company’s whistleblowing channels and that it applies to all employees.</p> <p>However, the company receives a score of ‘1’ because it is not clear how frequently employees must undertake anti-corruption training; it is not clear that all employees must refresh their training in this area every three years. It is also not clear from publicly available information that the company provides anti-corruption training to those in all countries of operation and in all relevant languages.</p>
<b>Evidence</b>
<p><b>[16] Proxy Statement 2018 (Document)</b>  <b>Accessed 02/06/2019</b>  <a href="http://investor.honeywell.com/Interactive/newlookandfeel/4121346/proxy-2018/images/Honeywell-Proxy2018.pdf">http://investor.honeywell.com/Interactive/newlookandfeel/4121346/proxy-2018/images/Honeywell-Proxy2018.pdf</a>                  [p.12] Honeywell’s Integrity and Compliance Program                  Honeywell’s Integrity and Compliance program reflects our vision and values and helps our employees, representatives, contractors, consultants, and suppliers comply with a high standard of business conduct globally. At the core of the Integrity and Compliance program is the Company’s Code of Business Conduct (the “Code”) that applies across the Company in all businesses and in all countries. All employees are required to complete Code of Business Conduct training and certify that they will comply with the Code. In addition, managers and executives certify on an annual basis that they will act in accordance with the Code.</p> <p>The Code is a baseline set of requirements that enables employees to recognize and be aware of how to report integrity, compliance, and legal issues. In addition, the Code outlines our pledge to recognize the dignity of each individual, respect each employee, provide compensation and benefits that are competitive, promote self-development through training that broadens work-related skills, and value diversity of perspectives and ideas. The Code provides guidance and outlines expectations in a number of key integrity and compliance areas, including how employees should treat each other, conflicts of interest, HSEPS, books and records, anti-corruption and proper business practices, trade compliance, insider trading, data privacy, respect for human rights, and the appropriate use of information technology and social media.</p> <p>In addition to the Code, Honeywell’s Integrity and Compliance program provides comprehensive training on key compliance topics, develops training scenarios, provides mechanisms for employees and third parties to report concerns, and ensures timely and fair reviews of integrity and compliance concerns through a best-in-class process to report and investigate Code of Business Conduct concerns.</p> <p><b>[3] Integrity and Compliance (Webpage)</b>  <b>Accessed 31/05/2019</b>  <a href="https://www.honeywell.com/content/honeywell/us/en/company/integrity-and-compliance">https://www.honeywell.com/content/honeywell/us/en/company/integrity-and-compliance</a>                  Integrity and Compliance                  Honeywell employees are trained in our Code of Business Conduct, which is designed to provide guidance on the Company’s standards of Integrity and Compliance. Our Code is an integral element of the Honeywell Behaviors. It describes the basic rules of conduct that we are expected to follow.</p> <p><b>KEY ELEMENTS:</b>                  Company-wide training for employees in health, safety, environmental responsibility, non-discrimination, conflicts of interest, anti-corruption, trade controls and the highest standards of excellence in all our business interactions.</p>

<b>Question</b>
<p><b>3.2. Does the company provide tailored training on its anti-bribery and corruption programme for at least the following categories of employees:</b></p> <ul style="list-style-type: none"> <li>a) Employees in high risk positions,</li> <li>b) Middle management,</li> <li>c) Board members.</li> </ul>
<b>Score</b>
0
<b>Comments</b>
<p>There is no publicly available evidence that the company provides tailored anti-bribery and corruption training to employees based on an assessment of their role and exposure to corruption risk. The company indicates that managers and executives must certify their adherence to the Code of Business Conduct on an annual basis, but it is not clear from publicly available information that these categories of employees receive any additional or tailored anti-corruption training.</p>
<b>Evidence</b>
<p><b>[16] Proxy Statement 2018 (Document)</b>  <b>Accessed 02/06/2019</b>  <a href="http://investor.honeywell.com/Interactive/newlookandfeel/4121346/proxy-2018/images/Honeywell-Proxy2018.pdf">http://investor.honeywell.com/Interactive/newlookandfeel/4121346/proxy-2018/images/Honeywell-Proxy2018.pdf</a>                  [p.12] Honeywell’s Integrity and Compliance Program                  Honeywell’s Integrity and Compliance program reflects our vision and values and helps our employees, representatives, contractors, consultants, and suppliers comply with a high standard of business conduct globally. At the core of the Integrity and Compliance program is the Company’s Code of Business Conduct (the “Code”) that applies across the Company in all businesses and in all countries. All employees are required to complete Code of Business Conduct training and certify that they will comply with the Code. In addition, managers and executives certify on an annual basis that they will act in accordance with the Code.</p>

<b>Question</b>
<b>3.3. Does the company measure and review the effectiveness of its anti-bribery and corruption communications and training programme?</b>
<b>Score</b>
<b>0</b>
<b>Comments</b>
There is no publicly available evidence that the company measures or reviews the effectiveness of its anti-bribery and corruption communications or training programme.
<b>Evidence</b>
No evidence found.

<b>Question</b>
<b>3.4. Does the company ensure that its employee incentive schemes are designed in such a way that they promote ethical behaviour and discourage corrupt practices?</b>
<b>Score</b>
<b>0</b>
<b>Comments</b>
There is no publicly available evidence that the company's incentive schemes for employees incorporate ethical or anti-bribery and corruption principles.
<b>Evidence</b>
<p><b>[1] Code of Business Conduct (Updated 2018) (Document)</b>  <b>Accessed 31/05/2019</b>  <a href="https://www.honeywell.com/content/dam/honeywell/files/code-of-conduct/Code_of_Business_Conduct_2018_English%20pdf.pdf">https://www.honeywell.com/content/dam/honeywell/files/code-of-conduct/Code_of_Business_Conduct_2018_English%20pdf.pdf</a></p> <p>[p.16] How We Treat Each Other  Our Company recognizes and rewards individual talents by providing competitive compensation and benefits. We also promote development through training that broadens work-related skills.</p> <p>[p.17] Respecting Each Other and Promoting a Positive Workplace  Honeywell respects and values the diversity reflected in our various backgrounds, experiences, and ideas. Together, we provide an inclusive work environment that fosters respect for all coworkers, clients, and business partners. Our workplace is one that reflects the diversity of the communities in which we operate and we are committed to providing employees with a workplace that is free from unlawful discrimination, harassment, or personal behavior that is not conducive to a productive work climate. This pledge applies to all phases of the employment relationship, including hiring, promotion, demotion, transfer, discipline, layoff or termination, compensation, use of facilities, and selection for training or related programs.</p>



<b>Question</b>
<b>3.5. Does the company commit to and assure itself that it will support and protect employees who refuse to act unethically, even when it might result in a loss of business?</b>
<b>Score</b>
<b>0</b>
<b>Comments</b>
There is no publicly available evidence that the company commits to support employees who refuse to act unethically.
<b>Evidence</b>
No evidence found.

<b>Question</b>
<b>3.6. Does the company have a clear policy of non-retaliation against whistleblowers and employees who report bribery and corruption incidents?</b>
<b>Score</b>
<b>1</b>
<b>Comments</b>
<p>Based on publicly available information, there is evidence that the company promotes a clear policy of non-retaliation against any employee who reports bribery and corruption incidents.</p> <p>However, the company receives a score of '1' because there is no clear evidence that the company assures itself of its employees' confidence in this commitment through surveys, usage data, or other clearly stated means. In addition, it is not clear that the policy of non-retaliation applies to all third parties, suppliers and joint venture partners engaged by the company who may use its reporting channels.</p>
<b>Evidence</b>
<p><b>[3] Integrity and Compliance (Webpage)</b>  <b>Accessed 31/05/2019</b>  <a href="https://www.honeywell.com/content/honeywell/us/en/company/integrity-and-compliance">https://www.honeywell.com/content/honeywell/us/en/company/integrity-and-compliance</a>  <b>KEY ELEMENTS</b></p> <p>We will never tolerate retaliation against anyone asking questions or raising concerns in good faith. Our employees should always feel comfortable coming forward or immediately reporting anyone not observing the Code through one of the available reporting channels.</p> <p><b>[2] Anti-Corruption Policy - Highlights (updated 2018) (Document)</b>  <b>Accessed 31/05/2019</b>  <a href="https://www.honeywell.com/content/dam/honeywell/files/code-of-conduct/Anticorruption%20Policy%202066%20pdf.pdf">https://www.honeywell.com/content/dam/honeywell/files/code-of-conduct/Anticorruption%20Policy%202066%20pdf.pdf</a>  <p>[p.5] <u>Raising Concerns</u>  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.</p> <p><b>[1] Code of Business Conduct (Updated 2018) (Document)</b>  <b>Accessed 31/05/2019</b>  <a href="https://www.honeywell.com/content/dam/honeywell/files/code-of-conduct/Code_of_Business_Conduct_2018_English%20pdf.pdf">https://www.honeywell.com/content/dam/honeywell/files/code-of-conduct/Code_of_Business_Conduct_2018_English%20pdf.pdf</a>  <p>[p.12] <u>Additional Obligations for Managers and Supervisors</u>  Honeywell managers and supervisors have a special duty to foster a culture of integrity and compliance. This means that managers and supervisors should serve as role models for integrity and compliance, respect, and diversity and inclusion in all their interactions. It also means that managers and supervisors should ensure that colleagues who report to them feel comfortable raising questions and concerns without fear of retaliation, that any concerns or questions will be addressed in a professional and timely manner, and that we will not compromise our standards of integrity and compliance to obtain business results.</p> <p>[p.15] <u>Honeywell Will Not Tolerate Retaliation</u>  Honeywell Will Not Tolerate Retaliation It is important that you feel comfortable raising your questions and concerns. Honeywell will not tolerate any form of retaliation against you for making a good faith report of actual or potential misconduct. Making a report in "good faith" means your report is honest, sincere, and complete to the best of your knowledge. If you feel an act of retaliation has occurred, you should report your concerns via one of the methods outlined in "Asking for Advice and Voicing Concerns".</p> </p> </p>

<b>Question</b>
<b>3.7. Does the company provide multiple whistleblowing and advice channels for use by all (e.g. employees and external parties), and do they allow for confidential and, wherever possible, anonymous reporting?</b>
<b>Score</b>
<b>2</b>
<b>Comments</b>
<p>There is evidence that the company provides multiple channels for employees to report instances of suspected corruption and seek advice on its anti-bribery and corruption programme. These channels are sufficiently varied to allow the employee to raise concerns across the management chain and to an external channel operated by an independent third party. There is evidence that these channels allow for confidential and, wherever possible, anonymous reporting.</p> <p>In addition, the company indicates that its reporting channels are available to employees across all operations and jurisdictions, as well as to all suppliers and third parties, and that the company's whistleblowing service is available in all relevant languages.</p>
<b>Evidence</b>
<p><b>[16] Proxy Statement 2018 (Document)</b>  <b>Accessed 02/06/2019</b>  <a href="http://investor.honeywell.com/Interactive/newlookandfeel/4121346/proxy-2018/images/Honeywell-Proxy2018.pdf">http://investor.honeywell.com/Interactive/newlookandfeel/4121346/proxy-2018/images/Honeywell-Proxy2018.pdf</a>                  [p.2] <u>Honeywell's Integrity and Compliance Program</u>                  In addition to the Code, Honeywell's Integrity and Compliance program provides comprehensive training on key compliance topics, develops training scenarios, provides mechanisms for employees and third parties to report concerns, and ensures timely and fair reviews of integrity and compliance concerns through a best-in-class process to report and investigate Code of Business Conduct concerns.</p> <p><b>[1] Code of Business Conduct (Updated 2018) (Document)</b>  <b>Accessed 31/05/2019</b>  <a href="https://www.honeywell.com/content/dam/honeywell/files/code-of-conduct/Code_of_Business_Conduct_2018_English%20pdf.pdf">https://www.honeywell.com/content/dam/honeywell/files/code-of-conduct/Code_of_Business_Conduct_2018_English%20pdf.pdf</a>                  [p.14] <u>Asking Advice and Voicing Concerns</u>                  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:</p> <ul style="list-style-type: none"> <li>• Your manager or supervisor</li> <li>• Your Human Resource representative</li> <li>• Your Integrity and Compliance Representatives (I&amp;C Reps) and Ethics Ambassadors</li> <li>• A member of the Law Department or Global Security</li> <li>• A member of the Integrity and Compliance Office</li> <li>• Local Honeywell formal complaint, grievance processes</li> <li>• ACCESS Integrity and Compliance Helpline</li> </ul> <p>The ACCESS Integrity Helpline 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: 800-237-5982, or refer to the Integrity and Compliance website at <a href="http://go.honeywell.com/AccessIntegrityHelpline">http://go.honeywell.com/AccessIntegrityHelpline</a> for a listing of additional country-specific helpline numbers.</p> <p>You may also report issues by mail or email to: Honeywell International Inc. Attention: ACCESS Helpline 115 Tabor Road Morris Plains, New Jersey 07950 <a href="mailto:access.integrity.helpline@honeywell.com">access.integrity.helpline@honeywell.com</a></p> <p>[p.15] 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.</p>

**[2] Anti-Corruption Policy - Highlights (updated 2018) (Document)****Accessed 31/05/2019**<https://www.honeywell.com/content/dam/honeywell/files/code-of-conduct/Anticorruption%20Policy%202066%20pdf.pdf>**[p.5] 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.

**[3] Integrity and Compliance (Webpage)****Accessed 31/05/2019**<https://www.honeywell.com/content/honeywell/us/en/company/integrity-and-compliance>

Access Integrity Helpline

800-237-5982 (U.S.) Or report issues by mail.

The ACCESS Integrity Helpline is a 24-hour service answered by an independent third-party provider that accommodates all of the languages that our employees speak.

**[9] Supplier Code of Conduct 2016 (Document)****Accessed 01/06/2019**<https://www.honeywell.com/content/dam/honeywell/files/code-of-conduct/Supplier%20Code%20of%20Business%20Conduct%20pdf.pdf>**[p.6] 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: Calling: 800-237-5982 Mailing: Honeywell International Attention: ACCESS Helpline 115 Tabor Road Morris Plains, N.J. 07950 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.

**[8] Annual Report 2018****Accessed 31/05/2019**<http://investor.honeywell.com/Cache/1500118299.PDF?O=PDF&T=&Y=&D=&FID=1500118299&iid=4121346>

[p.6] We also have an active integrity hotline to ensure we address potential issues quickly, efficiently, and with appropriate discretion when poor behaviors or actions are experienced or observed.

## 4. Conflict of Interest

<b>Question</b>
<b>4.1. Does the company have a policy defining conflicts of interest – actual, potential and perceived – that applies to all employees and board members?</b>
<b>Score</b>
<b>2</b>
<b>Comments</b>
Based on publicly available information, there is evidence that the company formally addresses conflicts of interest as a corruption risk and that it has clear policies to define actual, potential and perceived conflicts. There is evidence that the company’s policy specifically addresses possible conflicts arising from outside employment, financial interests, dealings with family members and recruitment of former government officials. The company states that all employees and directors must adhere to its policies covering these risks.
<b>Evidence</b>
<p><b>[2] Anti-Corruption Policy - Highlights (updated 2018) (Document)</b>  <b>Accessed 31/05/2019</b>  <a href="https://www.honeywell.com/content/dam/honeywell/files/code-of-conduct/Anticorruption%20Policy%202066%20pdf.pdf">https://www.honeywell.com/content/dam/honeywell/files/code-of-conduct/Anticorruption%20Policy%202066%20pdf.pdf</a></p> <p>[p.4] <u>Conflicts of Interest</u>  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.</p> <p>[p.4] <u>Recruitment</u>  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.</p> <p><b>[1] Code of Business Conduct (Updated 2018) (Document)</b>  <b>Accessed 31/05/2019</b>  <a href="https://www.honeywell.com/content/dam/honeywell/files/code-of-conduct/Code_of_Business_Conduct_2018_English%20pdf.pdf">https://www.honeywell.com/content/dam/honeywell/files/code-of-conduct/Code_of_Business_Conduct_2018_English%20pdf.pdf</a></p> <p>[p.12] <u>Who Must Follow Our Code</u>  Our Code applies to all employees, officers and directors of Honeywell. Where appropriate, business partners working on our Company’s behalf should also familiarize themselves with and follow our Code. If your job responsibilities require you to interact with representatives working on behalf of Honeywell, be sure to inform them of their responsibility to act in accordance with this Code and provide them with a copy. Their behavior must be consistent with our Code, other Honeywell policies, and applicable laws and regulations.</p> <p>[p.23] <u>Avoiding Conflicts of Interest</u>  As part of our duty to uphold our Company’s reputation, we must avoid improper conflicts of interest. A “conflict of interest” occurs when our personal interests interfere with, or appear to interfere with, our ability to perform our jobs without bias. We may not engage in any interest, investment or association in which a conflict of interest might arise.</p> <p>If you have a potential or actual conflict of interest, you must disclose it by speaking with your supervisor or by contacting the Law Department or the Honeywell Integrity and Compliance Office. Conflicts of interest are often easily avoided if disclosed in advance. The following sections describe situations that may create conflicts of interest. It is important to remember that conflicts may also be created when a member of your household or immediate family is the individual involved.</p> <p>[p.25] <u>Financial Interests</u></p>

As Honeywell employees, we generally should avoid doing business with any company in which we have a personal financial interest. There may be situations where our personal financial interest in a company with which Honeywell does business is permissible. However, such situations should be reviewed by the Law Department or the Integrity and Compliance Office to determine the best course of action. In addition, you may not purchase or maintain a significant financial interest in a customer, competitor, or business partner that does business with, or potentially does business with Honeywell, unless you receive approval from the Law Department. Always ensure you are able to make business decisions with Honeywell's best interests in mind.

Q: Artie has been asked to be on the board of a local non-profit organization that helps to recycle and refurbish used computers and electronics for the benefit of disadvantaged youth. There is no overlap between what this organization does and Honeywell's business, and Artie's commitment as a board member would be to attend meetings (outside of Honeywell office hours), review business plans, and discuss strategy. Can Artie be a board member?

A: Yes. Although this does not appear to present a conflict of interest with Artie's responsibilities to Honeywell, Artie should still first disclose this to his manager, HR, and/or the Global Integrity and Compliance team and get prior approval before accepting the board position. In addition, Artie should ensure that these activities take place outside of Honeywell working hours and do not interfere with his Honeywell work. See the Company's Outside Organization Service Policy.

#### [p.26] Outside Employment

From time to time, you may wish to engage in work outside our Company. In doing so, you must ensure that any outside employment does not create a conflict of interest. We must never use Honeywell tangible and intangible property, including documents, Information Technology assets, facilities, and intellectual property to conduct non-Honeywell business.

Q: John is a communications manager and in the evenings and weekends works as a football coach at a community college. It is end of the football season and John is eager for his team to make it to the finals. He is under a tight deadline at work so he is wondering if he can ask his direct reports to help him plan for the upcoming game's logistics. Can John get support from his direct reports for his after-work football job?

A: No. Asking his direct reports to help him with his after-work football job is an inappropriate use of Honeywell resources and creates a conflict of interest. Note that in this situation John should advise his supervisor that he is engaged in his additional coaching activities outside of Honeywell working hours and refrain from using Honeywell resources to support that work. Business with Friends and Family Members Business relationships with family members and friends can result in a conflict of interest, or the appearance of a conflict. For this reason, you should never be involved with or attempt to influence the bidding, negotiating, or contracting process between yourself, a family member, or a close friend and Honeywell. This rule applies even in indirect situations where you, your family member or close friend owns or works on behalf of another company with which Honeywell does, or is considering doing, business.

Q: Sam works in Procurement and would like place an order for Honeywell parts with his cousin's distribution company. Can Sam procure the Honeywell parts from his cousin's company?

A: Sam should disclose his relationship to his cousin's company to his supervisor and recuse himself from any procurements involving family members or close friends. His cousin's company could be qualified to compete for Honeywell business if it qualifies under Honeywell's standard procurement practices, Sam is recused from the procurement decision, and the procurement is arm's length and follows the normal, standard procurement rules that apply to all suppliers.

#### [p.27] Improper Reporting Relationships

We need to avoid improper reporting relationships. They can lead to potential legal exposure for the Company and perceptions of favoritism and preferential treatment among the colleagues of those involved, invariably leading to an unhealthy workplace environment. Accordingly, we may not directly or indirectly supervise, or work under the supervision of, a family member or someone with whom we have a close personal relationship, whether that relationship is sexual or otherwise.

Q: Salma is short-staffed at the moment and needs to hire someone as soon as possible. At a family picnic, Salma's cousin mentions that she is looking for a job. Salma asks her cousin to apply for the position as soon as possible.



A: This could create a conflict of interest or could give the appearance of a conflict of interest if Salma's cousin reported to her. While there is no general prohibition on family members working at Honeywell, Salma should disclose her family relationship during the recruitment and hiring process, she should recuse herself from the hiring decisions, and the normal staffing and management processes and controls should be followed.

[p.27] Improper Personal Benefits

A conflict of interest may also arise when a director, officer, or employee, or a member of his or her immediate family, receives improper personal benefits because of his or her position at Honeywell. Such benefits may include gifts or loans from an entity or person with whom our Company does business. We must avoid accepting any such improper benefit. In addition, a conflict of interest arises if a Honeywell employee assists a competitor to Honeywell's detriment. For example, providing confidential information to a spouse or partner who works for a competitor would constitute a conflict of interest and violate our Code.

[p.28] Q: Jane works in the procurement department at Honeywell. She and a few of her friends have been working on starting up their own business in the 3D printing field. Jane has been working on the business plan after working hours and on weekends. She was also tasked with getting some pricing detail of potential suppliers. Jane goes on the Honeywell system and pulls the pricing data of some relevant suppliers. Is there anything wrong with Jane's actions?

A: Yes. This activity creates a conflict of interest. Jane should not use Honeywell information for her personal benefit or use or perform work for a personal business on Honeywell premises or during Honeywell working hours.

Corporate Opportunities

In order to make objective business decisions on behalf of Honeywell, we must never compete with our Company. This means we may not take for ourselves any business or investment opportunities that we discover through our position at Honeywell or through Company property or information. In addition, we must never help anyone else take such business or investment opportunities for personal gain. This includes our family members and friends.

**[16] Proxy Statement 2018 (Document)**

**Accessed 02/06/2019**

<http://investor.honeywell.com/Interactive/newlookandfeel/4121346/proxy-2018/images/Honeywell-Proxy2018.pdf>

[p.26] CERTAIN RELATIONSHIPS AND RELATED TRANSACTIONS

Applicable Policies and Procedures

Furthermore, the Honeywell Code of Business Conduct requires that each director and executive officer report to the Board of Directors on an ongoing basis any relationship or transaction that may create or appear to create a conflict between the personal interests of those individuals (or their immediate family members) and the interests of the Company. A conflict, or appearance of a conflict, might arise, for example, by accepting gifts or loans from a current or potential customer, supplier or competitor, owning a financial interest in, or serving in a business capacity with, an outside enterprise that competes with or does or wishes to do business with the Company, serving as an intermediary for the benefit of a third party in transactions involving the Company or using confidential Company information or other corporate assets for personal profit.

[p.27] If a conflict of interest or related party transaction is of a type or a nature that falls within the scope of oversight of a particular Board Committee, it is referred to that Committee for review. The Board or the responsible Committee must review any potential conflict and determine whether any action is required. This includes whether to authorize, ratify or direct the unwinding of the relationship or transaction under consideration, as well as ensure that appropriate controls are in place to protect Honeywell and its shareowners. In making that determination, the Board or responsible Committee considers all relevant facts and circumstances, such as:

- The benefits of the transaction to Honeywell;
- The terms of the transaction and whether they are arm's-length and in the ordinary course of the Company's business;
- The direct or indirect nature of the related person's interest in the transaction;
- The size and expected term of the transaction; and
- Other facts and circumstances that bear on the materiality of the related person transaction under applicable law and listing standards.

Each director and officer also completes and signs a questionnaire at the end of each fiscal year to confirm that there are no material relationships or related person transactions between such individuals and the Company other than those previously disclosed to Honeywell. This ensures that all material relationships and related person



transactions are identified, reviewed and disclosed in accordance with applicable policies, procedures and regulations.

<b>Question</b>
<b>4.2. Are there procedures in place to identify, declare and manage conflicts of interest, which are overseen by a body or individual ultimately accountable for the appropriate management and handling of conflict of interest cases?</b>
<b>Score</b>
<b>1</b>
<b>Comments</b>
<p>Based on publicly available information, there is evidence that the company has procedures in place to identify, declare and manage conflicts of interest, including actual, potential and perceived conflicts. The company states that employees can report any conflicts to the HR, Law, or Global Integrity and Compliance departments. The company also gives various examples of potential scenarios which highlight conflicts of interest.</p> <p>However, the company receives a score of '1' because there is no publicly available evidence that all employee and director conflict of interest declarations are held in a dedicated central register or database accessible to those with responsibility for oversight. There is also no clear evidence that breaches of the conflict of interest policy may result in disciplinary action; the company only states that conflicts of interest must be avoided. In addition, it is not clear that a specific body has ultimate oversight of all conflict of interest cases.</p>
<b>Evidence</b>
<p><b>[2] Anti-Corruption Policy - Highlights (updated 2018) (Document)</b>  <b>Accessed 31/05/2019</b>  <a href="https://www.honeywell.com/content/dam/honeywell/files/code-of-conduct/Anticorruption%20Policy%202066%20pdf.pdf">https://www.honeywell.com/content/dam/honeywell/files/code-of-conduct/Anticorruption%20Policy%202066%20pdf.pdf</a>  <u>[p.4] Conflicts of Interest</u>  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.</p> <p><b>[1] Code of Business Conduct (Updated 2018) (Document)</b>  <b>Accessed 31/05/2019</b>  <a href="https://www.honeywell.com/content/dam/honeywell/files/code-of-conduct/Code_of_Business_Conduct_2018_English%20pdf.pdf">https://www.honeywell.com/content/dam/honeywell/files/code-of-conduct/Code_of_Business_Conduct_2018_English%20pdf.pdf</a>  <u>[p.23] Avoiding Conflict of Interest</u>  If you have a potential or actual conflict of interest, you must disclose it by speaking with your supervisor or by contacting the Law Department or the Honeywell Integrity and Compliance Office. Conflicts of interest are often easily avoided if disclosed in advance. The following sections describe situations that may create conflicts of interest. It is important to remember that conflicts may also be created when a member of your household or immediate family is the individual involved.</p> <p><u>[p.25] Financial Interests</u>  As Honeywell employees, we generally should avoid doing business with any company in which we have a personal financial interest. There may be situations where our personal financial interest in a company with which Honeywell does business is permissible. However, such situations should be reviewed by the Law Department or the Integrity and Compliance Office to determine the best course of action. In addition, you may not purchase or maintain a significant financial interest in a customer, competitor, or business partner that does business with, or potentially does business with Honeywell, unless you receive approval from the Law Department. Always ensure you are able to make business decisions with Honeywell's best interests in mind.</p> <p>Q: Artie has been asked to be on the board of a local non-profit organization that helps to recycle and refurbish used computers and electronics for the benefit of disadvantaged youth. There is no overlap between what this organization does and Honeywell's business, and Artie's commitment as a board member would be to attend meetings (outside of Honeywell office hours), review business plans, and discuss strategy. Can Artie be a board member?</p> <p>A: Yes. Although this does not appear to present a conflict of interest with Artie's responsibilities to Honeywell, Artie should still first disclose this to his manager, HR, and/or the Global Integrity and Compliance team and get prior approval before accepting the board position. In addition, Artie should ensure that these activities take place</p>

outside of Honeywell working hours and do not interfere with his Honeywell work. See the Company's Outside Organization Service Policy.

[p.26] Outside Employment

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A: No. Asking his direct reports to help him with his after-work football job is an inappropriate use of Honeywell resources and creates a conflict of interest. Note that in this situation John should advise his supervisor that he is engaged in his additional coaching activities outside of Honeywell working hours and refrain from using Honeywell resources to support that work. Business with Friends and Family Members Business relationships with family members and friends can result in a conflict of interest, or the appearance of a conflict. For this reason, you should never be involved with or attempt to influence the bidding, negotiating, or contracting process between yourself, a family member, or a close friend and Honeywell. This rule applies even in indirect situations where you, your family member or close friend owns or works on behalf of another company with which Honeywell does, or is considering doing, business.

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We need to avoid improper reporting relationships. They can lead to potential legal exposure for the Company and perceptions of favoritism and preferential treatment among the colleagues of those involved, invariably leading to an unhealthy workplace environment. Accordingly, we may not directly or indirectly supervise, or work under the supervision of, a family member or someone with whom we have a close personal relationship, whether that relationship is sexual or otherwise.

Q: Salma is short-staffed at the moment and needs to hire someone as soon as possible. At a family picnic, Salma's cousin mentions that she is looking for a job. Salma asks her cousin to apply for the position as soon as possible.

A: This could create a conflict of interest or could give the appearance of a conflict of interest if Salma's cousin reported to her. While there is no general prohibition on family members working at Honeywell, Salma should disclose her family relationship during the recruitment and hiring process, she should recuse herself from the hiring decisions, and the normal staffing and management processes and controls should be followed.

Improper Personal Benefits

A conflict of interest may also arise when a director, officer, or employee, or a member of his or her immediate family, receives improper personal benefits because of his or her position at Honeywell. Such benefits may include gifts or loans from an entity or person with whom our Company does business. We must avoid accepting any such improper benefit. In addition, a conflict of interest arises if a Honeywell employee assists a competitor to Honeywell's detriment. For example, providing confidential information to a spouse or partner who works for a competitor would constitute a conflict of interest and violate our Code.

[p.28] Q: Jane works in the procurement department at Honeywell. She and a few of her friends have been working on starting up their own business in the 3D printing field. Jane has been working on the business plan after working hours and on weekends. She was also tasked with getting some pricing detail of potential suppliers. Jane goes on

the Honeywell system and pulls the pricing data of some relevant suppliers. Is there anything wrong with Jane's actions?

A: Yes. This activity creates a conflict of interest. Jane should not use Honeywell information for her personal benefit or use or perform work for a personal business on Honeywell premises or during Honeywell working hours.

Corporate Opportunities

In order to make objective business decisions on behalf of Honeywell, we must never compete with our Company. This means we may not take for ourselves any business or investment opportunities that we discover through our position at Honeywell or through Company property or information. In addition, we must never help anyone else take such business or investment opportunities for personal gain. This includes our family members and friends.

[p.55] Waivers of Our Code

In extremely limited circumstances, Honeywell may find it appropriate to waive a provision of our Code. Approval of any action not compliant with this Code must be sought in advance and may be granted only by the Chief Executive Officer or Senior Vice President & General Counsel of Honeywell. All waivers for members of the Board of Directors or for executive officers of Honeywell require the pre-approval of the Board of Directors (or a Committee thereof) and will be promptly disclosed when required by regulation or law. When a waiver is granted, the Board or responsible Committee shall ensure that appropriate controls are in place to protect the Company and its shareowners.

<b>Question</b>
<b>4.3. Does the company have a policy and procedure regulating the appointment of directors, employees or consultants from the public sector?</b>
<b>Score</b>
<b>1</b>
<b>Comments</b>
<p>There is evidence that the company acknowledges the possible bribery and conflict of interest risks associated with the recruitment of government officials. The company indicates that employees must receive approval from the HR and Global Integrity and Compliance departments before appointing a current or former government official.</p> <p>However, the company receives a score of ‘1’ because it does not provide further publicly available details on its procedures to mitigate the risks from such appointments, for example by implementing cooling-off periods, requiring a conflict of interest review and potentially imposing restrictions on the individual’s activities if any conflicts are identified.</p>
<b>Evidence</b>
<p><b>[2] Anti-Corruption Policy - Highlights (updated 2018) (Document)</b>  <b>Accessed 31/05/2019</b>  <a href="https://www.honeywell.com/content/dam/honeywell/files/code-of-conduct/Anticorruption%20Policy%202066%20pdf.pdf">https://www.honeywell.com/content/dam/honeywell/files/code-of-conduct/Anticorruption%20Policy%202066%20pdf.pdf</a></p> <p>[p.4] 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.</p> <p>Employees must get prior approval from HR, the SBU GC and Global Integrity and Compliance Department to hire these individuals.</p>

<b>Question</b>
<b>4.4. Does the company report details of the contracted services of serving politicians to the company?</b>
<b>Score</b>
<b>0</b>
<b>Comments</b>
There is no publicly available evidence that the company publishes details of the contracted services of serving politicians.
<b>Evidence</b>
No evidence found.

## 5. Customer Engagement

### 5.1 Contributions, Donations and Sponsorships

<b>Question</b>
<b>5.1.1. Does the company have a clearly defined policy and/or procedure covering political contributions?</b>
<b>Score</b>
<b>0</b>
<b>Comments</b>
<p>Based on publicly available information, there is evidence that the company has a policy on political contributions. The company indicates that corporate political contributions are generally prohibited, unless authorised by the Government Relations function and approved by the Senior Vice President and General Counsel specifically. The company states that it has not made any contributions since 2009, with the exception of two contributions to 501(c)(4) organisations which are publicly disclosed. In addition, there is evidence that the company is associated with a Political Action Committee (PAC) in the United States, which is subject to formal approval procedures and periodic audits.</p> <p>Since the company does not prohibit political donations and is associated with a PAC, it receives a score of '0' in line with the scoring criteria.</p>
<b>Evidence</b>
<p><b>[1] Code of Business Conduct (Updated 2018) (Document)</b>  Accessed 31/05/2019  <a href="https://www.honeywell.com/content/dam/honeywell/files/code-of-conduct/Code_of_Business_Conduct_2018_English%20pdf.pdf">https://www.honeywell.com/content/dam/honeywell/files/code-of-conduct/Code_of_Business_Conduct_2018_English%20pdf.pdf</a>  [p.53] Making Political and Charitable Contributions  Our Company understands the many ways in which the political process enriches our communities. Freedom of belief and conscience are fundamental rights, and we are free to communicate our opinions verbally, in writing or in graphical form without threat of censorship. However, when we participate in such activities, we should do so on our own time, at our own expense, and ensure that our activities do not conflict with the Code. We should not use Honeywell property for personal political activities. In addition, we should never engage in any political activities on Honeywell's behalf, unless authorized by the Government Relations function. Never coerce a co-worker, especially those with whom you have a reporting relationship, to support your particular causes.</p> <p>[p.54] As interested citizens, Honeywell employees are free to make individual personal contributions to candidates of their choice. Employees who are U.S. citizens or who are U.S.-based permanent residents are eligible to participate in the Honeywell International Political Action Committee (HIPAC), provided they meet certain legal requirements. To determine if you are eligible to participate in the HIPAC, contact the Government Relations function, or the general counsel of your business unit. Lobbying activities are highly regulated. Therefore, we may not make any contacts with government officials in an attempt to influence legislation, regulation, policy, or other governmental actions on Honeywell's behalf without authorization from the Government Relations function. For more information, please see our Government Relations Policy. Honeywell is committed to social responsibility in every step of the Company's activities. Oftentimes, our Company will support charitable activities in our local communities. Honeywell may engage in such charitable activities, so long as both the charity and the activity have been approved by management, the Law Department, or Honeywell Hometown Solutions. You may not send emails in an attempt to raise money for an unapproved charity or any other fundraiser on Honeywell's network. In addition, you may not use Honeywell assets, including Company time, for personal charitable pursuits.</p> <p><b>[10] Political Contributions (Webpage)</b>  Accessed 01/06/2019  <a href="http://investor.honeywell.com/Political-Contributions/Index?KeyGenPage=324758">http://investor.honeywell.com/Political-Contributions/Index?KeyGenPage=324758</a>  How we Engage  Our government relations organization is led by a Senior Vice President, Global Government Relations who reports directly to the Company's Senior Vice President and General Counsel (General Counsel). Members of the government relations organization work from a global network of offices.</p>

We strive to always engage responsibly in the political process and to ensure that our participation is fully consistent with all applicable laws and regulations, our principles of good governance, and our high standards of ethical conduct.

#### Management and Board Oversight of Lobbying and Political Activities

With respect to Board of Directors oversight, our public policy efforts, including all lobbying activities, political contributions, and payments to trade associations and other tax-exempt organizations, are the responsibility of the Corporate Governance and Responsibility Committee (CGRC), which consists entirely of independent, non-employee directors. Each year the CGRC receives an annual report on the Company's policies and practices regarding political contributions. In addition, each year the Senior Vice President, Global Government Relations reports to the CGRC on trade association political spending and to the full Board of Directors on our global lobbying and government relations program. The CGRC's oversight of our political activities ensures compliance with applicable law and alignment with our policies and our Code of Business Conduct.

#### Political Contributions

We have not made any political contributions using corporate funds since 2009 and have no intention of making such political contributions in the near future. Even before 2009, any such contributions were extremely rare and for de minimis amounts of less than \$5,000. Were we to use corporate funds for political contributions, such contributions would be made without regard to the personal partisan preferences of Company officers and executives.

We use the term "political contributions" broadly to mean contributions to:

- Candidates;
- Political parties;
- "527 groups" or "527 organizations" such as governors' associations and super PACs;
- Grass root campaigns intended to directly or indirectly influence the outcome of any ballot measures.

With respect to tax-exempt organizations, such as 501(c)(4)s, where funds may be used for political purposes, we have made only two Company contributions since 2009. In December 2012, we contributed \$1 million to the Fix the Debt Coalition, a non-partisan 501(c)(4) organization which seeks to educate and mobilize Americans on the need for a comprehensive plan to fix the United States' long-term debt and deficits but have made no further contributions. In February 2017, we contributed \$200,000 to the American Made Coalition, a 501(c)(4) organization consisting of a broad coalition of industry leaders with the goal of encouraging Congress to enact tax reform to spur economic growth. Both contributions were disclosed in our publicly available filings required under the Lobbying Disclosure Act. The decision to contribute funds to these organizations was discussed with the Board of Directors. Any use of corporate funds for political contributions would require the prior approval of the Company's General Counsel. These policies on political contributions are embedded in our Corporate Governance Guidelines and Code of Business Conduct.

#### Political Action Committee.

As noted above, we have not made any political contributions using corporate funds since at least 2009 and have no intention of making such political contributions in the near future. Any and all contributions we make in support of federal and state political candidates is through the non-partisan Honeywell International Political Action Committee (HIPAC), which is funded exclusively through voluntary contributions from eligible U.S.-based employees, which are not reimbursed by Honeywell. Decisions regarding use of HIPAC funds are made by a HIPAC Executive Committee, consisting of senior managers representing Corporate and each of the Company's operating segments, which meets quarterly to discuss how HIPAC's political disbursements can promote the interests of the Company and the economic growth of the U.S. Political disbursements made through HIPAC are made without regard to the personal partisan preferences of Company officers and executives. HIPAC spending decisions are made solely to promote the interests of Honeywell and are based on the following criteria: Honeywell's employee, supplier and/or customer base in legislators' districts/states; support for Honeywell's initiatives; leadership positions in the U.S. Congress or state legislatures; and, leadership positions on legislative committees that are relevant to Honeywell's businesses. Political contributions are never made with regard for the private political preferences of our executives. The Company conducts periodic audits of HIPAC practices and procedures, including the retention of outside auditors.

#### **[4] Governance Guidelines 2019 (webpage)**

Accessed 31/05/2019

<http://investor.honeywell.com/IRW/CustomPage/4121346/Index?KeyGenPage=324757>

Political Contributions



The Company's Code of Business Conduct provides that Company funds generally may not be used for political contributions, directly or indirectly, in support of any candidate or political party. The Code of Business Conduct also provides that, wherever lawful, the Company may make a contribution in connection with an occasional local initiative or referendum campaign where the Company's interests are directly involved. Any use of corporate funds for political expenditures requires the prior approval of the Company's Senior Vice President and General Counsel and is rarely approved.

The Company participates in the U.S. political process primarily through the non-partisan Honeywell International Political Action Committee (HIPAC), which is funded exclusively through voluntary contributions from eligible U.S.-based employees. HIPAC contributions can be viewed on the Federal Election Commission website at [www.fec.gov](http://www.fec.gov). Employees are not reimbursed, directly or indirectly, for political donations or expenses.

The Company also is a member of a number of trade associations. All trade association memberships are generally reviewed and approved by an executive officer of the Company. In addition, memberships in 501(c)(6) trade associations that receive more than US\$50,000 in membership dues from the Company in any fiscal year require prior approval of the Company's Senior Vice President and General Counsel, and all such organizations shall be instructed not to use funds received from the Company for any election-related activity.

The Corporate Governance and Responsibility Committee will receive an annual report on the Company's policies and practices related to political contributions and trade association memberships. The Corporate Governance and Responsibility Committee's oversight of the Company's political activities ensures compliance with applicable law and alignment with the Company's policies and Code of Business Conduct. In addition, each year, the Senior Vice President, Global Government Relations reports to the Corporate Governance and Responsibility Committee on trade association political spending and to the full Board on the Corporation's global lobbying and government relations program.

#### **[11] Corporate Governance Guidelines (Document)**

Accessed 01/06/2019

<http://investor.honeywell.com/Cache/1001249998.PDF?O=PDF&T=&Y=&D=&FID=1001249998&iid=4121346>

#### **[p.10] Political Contributions**

The Corporate Governance and Responsibility Committee will receive an annual report on the Company's policies and practices related to political contributions and trade association memberships. The Corporate Governance and Responsibility Committee's oversight of the Company's political activities ensures compliance with applicable law and alignment with the Company's policies and Code of Business Conduct. In addition, each year, the Senior Vice President, Global Government Relations reports to the Corporate Governance and Responsibility Committee on trade association political spending and to the full Board on the Corporation's global lobbying and government relations program.

<b>Question</b>
<b>5.1.2. Does the company publish details of all political contributions made by the company and its subsidiaries, or a statement that it has made no such contribution?</b>
<b>Score</b>
<b>2</b>
<b>Comments</b>
<p>There is evidence that the company publishes details of its political contributions. The company states that it has only made two corporate political contributions since 2009, in the form of donations to 501(c)(4) organisations. For each donation, the company lists the name of the recipient organisation and the amount donated; it is also clear that both organisations are located in the United States. In addition, there is evidence that the company publishes a direct link to the U.S. Federal Election Commission (FEC) and House of Representatives websites, where full details of the disbursements made through its Political Action Committee (PAC) can be accessed.</p>
<b>Evidence</b>
<p><b>[10] Political Contributions (Webpage)</b>  <b>Accessed 01/06/2019</b>  <a href="http://investor.honeywell.com/Political-Contributions/Index?KeyGenPage=324758">http://investor.honeywell.com/Political-Contributions/Index?KeyGenPage=324758</a>  <u>Political Contributions</u>                  We have not made any political contributions using corporate funds since 2009 and have no intention of making such political contributions in the near future. Even before 2009, any such contributions were extremely rare and for de minimis amounts of less than \$5,000. Were we to use corporate funds for political contributions, such contributions would be made without regard to the personal partisan preferences of Company officers and executives.</p> <p>With respect to tax-exempt organizations, such as 501(c)(4)s, where funds may be used for political purposes, we have made only two Company contributions since 2009. In December 2012, we contributed \$1 million to the Fix the Debt Coalition, a non-partisan 501(c)(4) organization which seeks to educate and mobilize Americans on the need for a comprehensive plan to fix the United States' long-term debt and deficits but have made no further contributions. In February 2017, we contributed \$200,000 to the American Made Coalition, a 501(c)(4) organization consisting of a broad coalition of industry leaders with the goal of encouraging Congress to enact tax reform to spur economic growth. Both contributions were disclosed in our publicly available filings required under the Lobbying Disclosure Act. The decision to contribute funds to these organizations was discussed with the Board of Directors.</p> <p><b>[4] Governance Guidelines 2019 (webpage)</b>                  Accessed 31/05/2019  <a href="http://investor.honeywell.com/IRW/CustomPage/4121346/Index?KeyGenPage=324757">http://investor.honeywell.com/IRW/CustomPage/4121346/Index?KeyGenPage=324757</a>  <u>Political Contributions</u></p> <p>[...]</p> <p>The Company participates in the U.S. political process primarily through the non-partisan Honeywell International Political Action Committee (HIPAC), which is funded exclusively through voluntary contributions from eligible U.S.-based employees. HIPAC contributions can be viewed on the Federal Election Commission website at www.fec.gov. Employees are not reimbursed, directly or indirectly, for political donations or expenses.</p>

**[22] United States FEC – Honeywell International Political Committee**

Accessed 06/03/2020

<https://docquery.fec.gov/cgi-bin/forms/C00096156/1376632/#DETAILED>

[End year report generated for Covering Period 12/01/2019 Through 12/31/2019]

**REPORT OF RECEIPTS AND DISBURSEMENTS**

For Other Than An Authorized Committee

FILING FEC-1376632

**1. Honeywell International Political Action Committee**

101 Constitution Ave, NW Suite 500  
Washington, DC 20001

2. FEC Committee ID #: C00096156

3. This committee HAS qualified as a multicandidate committee (see FEC Form 1M)

4. Report Type = YEAR-END

Filed: 01/31/2020

[SUMMARY PAGE](#)

[DETAILED SUMMARY PAGE](#)

[Schedule A Filings \(ITEMIZED RECEIPTS\)](#)

[Schedule B Filings \(ITEMIZED DISBURSEMENTS\)](#)

[...]

**ITEMIZED DISBURSEMENTS**

All Listed Line Numbers

**Committee: HONEYWELL INTERNATIONAL POLITICAL ACTION COMMITTEE**

Disbursement To	Address	Election Type	Date of Disbursement	Extra Description	Amount This Period	Text	Memo
Campaign Finance Solutions	4500 15th Street NW Washington, DC 20011		12/05/2019	Compliance Consulting	25805.00		
Campaign Finance Solutions	4500 15th Street NW Washington, DC 20011		12/05/2019	PAC fundraising supplies	2639.40		
Campaign Finance Solutions	4500 15th Street NW Washington, DC 20011		12/12/2019	PAC fundraising supplies	2639.40		
Campaign Finance Solutions	4500 15th Street NW Washington, DC 20011		12/18/2019	PAC fundraising supplies	6756.99		
Campaign Finance Solutions	4500 15th Street NW Washington, DC 20011		12/18/2019	PAC fundraising supplies	7918.20		
Campaign Finance Solutions	4500 15th Street NW Washington, DC 20011		12/18/2019	PAC fundraising supplies	27825.00		
Incentive Concepts	2645 Metro Blvd St. Louis, Missouri 63043		12/19/2019	PAC fundraising supplies	12593.68		
Chain Bridge Bank	1445-A Laughlin Avenue McLean, Virginia 22101		12/16/2019	Bank Service Charge	50.00		
Romina Khananisho	2800 Clarendon Blvd Apt W315 Arlington, DC 22201		12/17/2019	PAC meeting reimbursement	416.88		
Chain Bridge Bank	1445-A Laughlin Avenue McLean, Virginia 22101		12/18/2019	Bank Service Charge	25.00		
Chain Bridge Bank	1445-A Laughlin Avenue McLean, Virginia 22101		12/19/2019	Bank Service Charge	50.00		
C. Forbes Inc.	12830 W. Creek Parkway Suite G Richmond, Virginia 23238		12/20/2019	PAC fundraising supplies	4233.30		
Chain Bridge Bank	1445-A Laughlin Avenue McLean, Virginia 22101		12/27/2019	Bank Service Charge	12.00		
Amazon.com	1200 12th Ave S Ste 1200 Seattle, Washington 98144		12/10/2019	PAC fundraising supplies	138780.00		

[List continues to show information for all total PAC disbursements for 2019]

<b>Total Disbursement Amount (Non-Memo)</b>	<b>819409.85</b>
<b>Total Memo Amount</b>	<b>0</b>
<b>Number of Transactions (Non-Memo)</b>	<b>153</b>
<b>Number of Transactions (Memo)</b>	<b>0</b>

**[17] Lobbying Contribution Report (2018) (Document)**

Accessed 19/06/2019

<http://investor.honeywell.com/Cache/1001253031.PDF?O=PDF&T=&Y=&D=&FID=1001253031&iid=4121346>

[p.17-18]

7/28/2018

LD-203 Contribution Report



## LOBBYING CONTRIBUTION REPORT

Clerk of the House of Representatives • Legislative Resource Center • 135 Cannon Building • Washington, DC 20515

Secretary of the Senate • Office of Public Records • 232 Hart Building • Washington, DC 20510

### 1. FILER TYPE AND NAME

Type:

Organization  Lobbyist

Organization Name:  
Honeywell International

### 2. IDENTIFICATION NUMBERS

House Registrant ID:  
35195

Senate Registrant ID:  
57453

### 3. REPORTING PERIOD

Year:

2018

Mid-Year (January 1 - June 30)

Year-End (July 1 - December 31)

Amendment

### 4. CONTACT INFORMATION

Contact Name:  
Mr. James Carroll

Email:  
james.carroll@stateandfed.com

Phone:  
2026622629

Address:  
101 CONSTITUTION AVENUE, NW  
WASHINGTON, DC 20001

USA

### 5. POLITICAL ACTION COMMITTEE NAMES

- Honeywell International Political Action Committee

### 6. CONTRIBUTIONS

No Contributions

#### #1.

Contribution Type: FECA  
Contributor Name: Honeywell International Political Action Committee  
Amount: \$4,000.00  
Date: 01/10/2018

Payee: Devin Nunes Campaign Committee  
Honoree: Devin Nunes

#### #2.

Contribution Type: FECA  
Contributor Name: Honeywell International Political Action Committee  
Amount: \$1,000.00  
Date: 01/10/2018

Payee: Lamborn for Congress  
Honoree: Doug Lamborn

#### #3.

Contribution Type: FECA  
Contributor Name: Honeywell International Political Action Committee  
Amount: \$1,000.00  
Date: 01/10/2018

Payee: The Peter Norbeck Leadership PAC  
Honoree: Mike Rounds

<https://lda.congress.gov/LC/protected/LCWork/2018/MM/57453DOM.xml?1532790396718>

1/57

7/28/2018

LD-203 Contribution Report

#### #4.

Contribution Type: FECA  
Contributor Name: Honeywell International Political Action Committee  
Amount: \$2,500.00  
Date: 01/10/2018

Payee: DEREK PAC  
Honoree: Derek Kilmer

#### #5.

Contribution Type: FECA  
Contributor Name: Honeywell International Political Action Committee  
Amount: \$5,000.00  
Date: 01/10/2018

<b>Question</b>
<b>5.1.3. Does the company have a clearly defined policy and/or procedure covering charitable donations and sponsorships, whether made directly or indirectly, and does it publish details of all such donations made by the company and its subsidiaries?</b>
<b>Score</b>
<b>1</b>
<b>Comments</b>
<p>Based on publicly available information, there is evidence that the company has a policy to ensure that charitable donations and sponsorships are not used as vehicles for bribery and corruption. The company states that all such contributions must follow its internal policies and indicates that all charities and proposed activities must be approved by management and the Law Department. In addition, the company states that its Integrity and Compliance department must approve any donation of over US\$10,000 that may benefit a government official in a 12 month period.</p> <p>However, the company receives a score of ‘1’ because there is no publicly available evidence that it publishes full details of all charitable contributions and sponsorships made, such as details of the recipient, amount, country of recipient and which corporate entity made the payment. In addition, it is not clear that the company has procedures in place to conduct due diligence on recipients, nor does it publish information on criteria for donations.</p>
<b>Evidence</b>
<p><b>[2] Anti-Corruption Policy - Highlights (updated 2018) (Document)</b>  <b>Accessed 31/05/2019</b>  <a href="https://www.honeywell.com/content/dam/honeywell/files/code-of-conduct/Anticorruption%20Policy%202066%20pdf.pdf">https://www.honeywell.com/content/dam/honeywell/files/code-of-conduct/Anticorruption%20Policy%202066%20pdf.pdf</a>                      [p.5] <u>Charitable Contributions and Sponsorships</u>                      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.</p> <p><b>[1] Code of Business Conduct (Updated 2018) (Document)</b>  <b>Accessed 31/05/2019</b>  <a href="https://www.honeywell.com/content/dam/honeywell/files/code-of-conduct/Code_of_Business_Conduct_2018_English%20pdf.pdf">https://www.honeywell.com/content/dam/honeywell/files/code-of-conduct/Code_of_Business_Conduct_2018_English%20pdf.pdf</a>                      [p.54] <u>Making Political and Charitable Donations</u>                      Honeywell is committed to social responsibility in every step of the Company’s activities. Oftentimes, our Company will support charitable activities in our local communities. Honeywell may engage in such charitable activities, so long as both the charity and the activity have been approved by management, the Law Department, or Honeywell Hometown Solutions. You may not send emails in an attempt to raise money for an unapproved charity or any other fundraiser on Honeywell’s network. In addition, you may not use Honeywell assets, including Company time, for personal charitable pursuits.</p>

## 5.2 Lobbying

<b>Question</b>
<b>5.2.1 Does the company have a policy and/or procedure covering responsible lobbying?</b>
<b>Score</b>
<b>1</b>
<b>Comments</b>
<p>Based on publicly available information, there is evidence that the company has a policy on lobbying. The company indicates that all lobbying activities are overseen by its Law Department, Global Compliance Department and Government Relations department. There is also evidence that the board and executive leadership receive regular reports on the company's lobbying activities.</p> <p>However, there is no publicly available evidence that the company's policy provides clear guidelines or standards of conduct that constitute responsible lobbying. It is also not clear from publicly available information that the company's policy and its oversight mechanisms apply to all employees and individuals engaged in lobbying, including all internal, external and association lobbyists.</p>
<b>Evidence</b>
<p><b>[1] Code of Business Conduct (Updated 2018) (Document)</b>  <b>Accessed 31/05/2019</b>  <a href="https://www.honeywell.com/content/dam/honeywell/files/code-of-conduct/Code_of_Business_Conduct_2018_English%20pdf.pdf">https://www.honeywell.com/content/dam/honeywell/files/code-of-conduct/Code_of_Business_Conduct_2018_English%20pdf.pdf</a>  <u>[p.53] Making Political and Charitable Contributions</u>                      Lobbying activities are highly regulated. Therefore, we may not make any contacts with government officials in an attempt to influence legislation, regulation, policy, or other governmental actions on Honeywell's behalf without authorization from the Government Relations function. For more information, please see our Government Relations Policy.</p> <p><b>[10] Political Contributions (Webpage)</b>  <b>Accessed 01/06/2019</b>  <a href="http://investor.honeywell.com/Political-Contributions/Index?KeyGenPage=324758">http://investor.honeywell.com/Political-Contributions/Index?KeyGenPage=324758</a>  <u>Why we Engage</u>                      Engagement in the political process is critical to our success. Our future growth depends on forward-thinking legislation and regulation that makes society safer and more energy efficient and improves public infrastructure. For example, nearly 50% of our products are linked to energy efficiency. In fact, if our existing technologies were widely adopted today, energy demand in the U.S. could be reduced by 20-25%.</p> <p>When formulating policies and drafting laws that improve safety, security, energy efficiency and infrastructure, policymakers need to be fully informed about the commercial availability of products and services that can deliver real benefits and improvements. Politicians and regulators risk missing opportunities to fully exploit technology or causing unintended consequences when making decisions without the benefit of information from the commercial sector.</p> <p>Our lobbying activities are designed to educate policymakers. We consistently advocate the need for technologically neutral solutions that allow robust competition in the private sector to deliver the intended policy results.</p> <p><u>Management and Board Oversight of Lobbying Activities</u>                      The law department oversees our lobbying activities. The Senior Vice President, Global Government Relations reports to the General Counsel and also works closely with the Vice President, Global Compliance whose organization ensures compliance with our political spending policy. The General Counsel, Senior Vice President, Global Government Relations and Vice President, Global Compliance meet regularly with our Chairman and Chief Executive Officer and his leadership team about legislative, regulatory and political developments.</p> <p>With respect to Board of Directors oversight, our public policy efforts, including all lobbying activities, political contributions, and payments to trade associations and other tax-exempt organizations, are the responsibility of the Corporate Governance and Responsibility Committee (CGRC), which consists entirely of independent, non-</p>

employee directors. Each year the CGRC receives an annual report on the Company's policies and practices regarding political contributions. In addition, each year the Senior Vice President, Global Government Relations reports to the CGRC on trade association political spending and to the full Board of Directors on our global lobbying and government relations program. The CGRC's oversight of our political activities ensures compliance with applicable law and alignment with our policies and our Code of Business Conduct.

**[11] Corporate Governance Guidelines 2019 (Document)**

**Accessed 01/06/2019**

<http://investor.honeywell.com/Cache/1001249998.PDF?O=PDF&T=&Y=&D=&FID=1001249998&iid=4121346>

**Annual Performance Evaluation**

In addition, each year, the Senior Vice President, Global Government Relations reports to the Corporate Governance and Responsibility Committee on trade association political spending and to the full Board on the Corporation's global lobbying and government relations program.



<b>Question</b>
<b>5.2.2 Does the company publish details of the aims and topics of its public policy development and lobbying activities it carries out?</b>
<b>Score</b>
1
<b>Comments</b>
<p>There is evidence that the company publishes information on its significant legislative and regulatory priorities, alongside explanations of their relevance to the company's commercial activities. The company also provides some information on the key legislation and issues on which it has lobbied on a quarterly basis, by providing a direct link to its legally mandated Lobbying Disclosure Reports in the United States.</p> <p>However, the company receives a score of '1' because it is not clear from publicly available information that this represents the aims and topics of its lobbying in all jurisdictions, nor does it provide a statement to indicate that it does not engage in lobbying outside of the United States.</p>
<b>Evidence</b>
<p><b>[10] Political Contributions (Webpage)</b>  <b>Accessed 01/06/2019</b>  <a href="http://investor.honeywell.com/Political-Contributions/Index?KeyGenPage=324758">http://investor.honeywell.com/Political-Contributions/Index?KeyGenPage=324758</a>  <u>Why we Engage</u>  Engagement in the political process is critical to our success. Our future growth depends on forward-thinking legislation and regulation that makes society safer and more energy efficient and improves public infrastructure. For example, nearly 50% of our products are linked to energy efficiency. In fact, if our existing technologies were widely adopted today, energy demand in the U.S. could be reduced by 20-25%.</p> <p>When formulating policies and drafting laws that improve safety, security, energy efficiency and infrastructure, policymakers need to be fully informed about the commercial availability of products and services that can deliver real benefits and improvements. Politicians and regulators risk missing opportunities to fully exploit technology or causing unintended consequences when making decisions without the benefit of information from the commercial sector. Our lobbying activities are designed to educate policymakers. We consistently advocate the need for technologically neutral solutions that allow robust competition in the private sector to deliver the intended policy results.</p> <p>Below is a list of some of our top legislative and regulatory priorities:</p> <ul style="list-style-type: none"> <li>• Policies and regulations that encourage the use of public utilities to deploy demand response technologies and smart grids to reduce electricity consumption;</li> <li>• Automotive emission reduction policies that reduce the use of global warming and ozone depleting refrigerants;</li> <li>• Investment in the air traffic control system to make flying both safer and more energy efficient;</li> <li>• Commercial building, permitting and construction codes that facilitate safer, more energy efficient construction and renovation;</li> <li>• High-priority Department of Defense programs that support our national security;</li> <li>• Tax, trade and other policies to ensure that our nation can compete on a level playing field around the globe; and</li> <li>• Policies that impact the deployment of Industrial Internet of Things technology and software including data privacy and cybersecurity.</li> </ul> <p><b>[12] Global Government Relations Overview 2014 (Document)</b>  <b>Accessed 02/06/2019</b>  <a href="http://investor.honeywell.com/Cache/1001207089.PDF?O=PDF&amp;T=&amp;Y=&amp;D=&amp;FID=1001207089&amp;iid=4121346">http://investor.honeywell.com/Cache/1001207089.PDF?O=PDF&amp;T=&amp;Y=&amp;D=&amp;FID=1001207089&amp;iid=4121346</a>  <p>[p.4] <u>Key Global ACS Priorities</u>  Government policies, standards and regulations promoting safety, security and energy efficiency including:</p> <ul style="list-style-type: none"> <li>– Energy efficiency opportunities and pursuits</li> <li>– Energy Savings Performance Contracts</li> <li>– SmartGrid / SmartCities</li> <li>– Building codes to generate energy efficiency and safety upgrades</li> </ul> </p>



- Promotion of fire, safety and personal protection products
- Critical infrastructure protection
- Transportation and airport projects

[p.8] Key Global PMT Priorities

- Low Global Warming Potential (LGWP) HFO products – advocate for favorable legislation, regulation and global treaties; work with key stakeholders
- Nuclear – support U.S. nuclear conversion industry; build awareness for offerings
- Asphalt additives – build awareness and drive adoption
- Natural gas – track and support key pursuits
- Renewables – regulatory support, funding, partnerships, standards and incentives
- UOP / HPS pursuits (i.e. refineries)
- Chemical reform

**[18] Lobbying Disclosure Report (2018) (Document)**

**Accessed 19/06/2019**

<http://investor.honeywell.com/Cache/1001253030.PDF?O=PDF&T=&Y=&D=&FID=1001253030&iid=4121346>

4/20/2018

LD2 Lobbying Disclosure Report

**LOBBYING ACTIVITY.** Select as many codes as necessary to reflect the general issue areas in which the registrant engaged in lobbying on behalf of the client during the reporting period. Using a separate page for each code, provide information as requested. Add additional page(s) as needed.

15. General issue area code DEF

16. Specific lobbying issues

HR 1625 Consolidated Appropriations Act 2018  
 HR 1301 Continuing Appropriation Act 2018  
 HR 195 Continuing Resolution 2018  
 National Defense Authorization Act for FY 2019  
 Issues related to DARPA advanced technology programs (no pending legislation)  
 Issues related to use of automotive products and technologies in military vehicles (no pending legislation)  
 Issues related to military energy efficiency programs (no pending legislation)  
 Issues related to testing standards for ballistic materials (no pending legislation)  
 Issues related to defense acquisition reform  
 Issues related to Radiation Hardened Microelectronics  
 Issues related to US Army Improved Turbine Engine Program (ITEP)  
 Issues related to US Air Force Advance Trainer Program

17. House(s) of Congress and Federal agencies  Check if None

U.S. SENATE, U.S. HOUSE OF REPRESENTATIVES, Air Force - Dept of, Army - Dept of (Other), Defense - Dept of (DOD), Defense Advanced Research Projects Agency (DARPA), Navy - Dept of

18. Name of each individual who acted as a lobbyist in this issue area

First Name	Last Name	Suffix	Covered Official Position (if applicable)	New
Elizabeth	Rossmann			<input type="checkbox"/>
Joseph	Fengler			<input type="checkbox"/>

19. Interest of each foreign entity in the specific issues listed on line 16 above  Check if None

<b>Question</b>
<b>5.2.3 Does the company publish full details of its global lobbying expenditure?</b>
<b>Score</b>
<b>1</b>
<b>Comments</b>
<p>There is evidence that the company publishes details of its lobbying expenditure, by making its federal quarterly lobbying reports up to the most recently reported financial year available via a direct link on its website.</p> <p>However, the company receives a score of '1' because there is no evidence that this expenditure data is broken down into expenditure through internal, external or association lobbyists. In addition, it is not clear from publicly available information that this represents the company's lobbying expenditure in all jurisdictions, nor does it provide a statement to indicate that it does not engage in lobbying outside of the United States.</p>
<b>Evidence</b>
<p><b>[10] Political Contributions (Webpage)</b>  <b>Accessed 01/06/2019</b>  <a href="http://investor.honeywell.com/Political-Contributions/Index?KeyGenPage=324758">http://investor.honeywell.com/Political-Contributions/Index?KeyGenPage=324758</a>  <u>How to Get More Information</u>  Federal disclosures regarding our lobbying activities are publicly available. Our public disclosure includes, among other things, our aggregate annual spending on trade association membership dues spent on lobbying or political expenditures as well as HIPAC contributions to political candidates. Starting in 2011, information regarding these topics has been disclosed on this website, and the Company will maintain an archive of this information, as well as information subsequently made available on this website. Disclosures from prior periods can be accessed via the links below.</p> <ul style="list-style-type: none"> <li>• With respect to federal lobbying activity, we maintain and file Lobbying Disclosure Act Registration and Reports (Form LD-2) with the Secretary of the U.S. Senate and the Clerk of the U.S. House of Representatives, which reflect the particular bills and issues on which individual lobbyists had activity, as well as the total lobbying expenses incurred during each calendar quarter. Click here for Forms LD-2 for 2017 and here for 2018, each of which includes the aggregate amount of the company's spending on lobbying by calendar quarter, including trade association memberships. Reports for prior periods may be found at <a href="http://www.senate.gov/legislative/Public_Disclosure/LDA_reports.htm">http://www.senate.gov/legislative/Public_Disclosure/LDA_reports.htm</a>.</li> <li>• Honeywell and its registered federal lobbyists must also file semi-annual reports (Form LD-203) providing, among other things, HIPAC disbursements and personal, direct contributions to federal candidates. Click here for Forms LD-203 for 2017, here for 2018. Reports for prior periods may be found at <a href="http://www.senate.gov/legislative/Public_Disclosure/LDA_reports.htm">http://www.senate.gov/legislative/Public_Disclosure/LDA_reports.htm</a>.</li> <li>• Monthly reports filed with the Federal Election Commission (FEC) for prior periods can be accessed on the FEC's website <a href="http://www.fec.gov">www.fec.gov</a>. [To access an archive of Honeywell's FEC reports, go to <a href="http://www.fec.gov">www.fec.gov</a> &gt; select "Campaign Finance Disclosure Portal" &gt; select "Candidate and Committee Viewer" &gt; enter "Honeywell International Political Action Committee" in the Search box &gt; select "Filings" from the Default Tab options and click "Get Listing" &gt; click the ID number (C00096156) link to view monthly filings.]</li> </ul>

**[18] Lobbying Disclosure Report (2018) (Document)**

Accessed 19/06/2019

<http://investor.honeywell.com/Cache/1001253030.PDF?O=PDF&T=&Y=&D=&FID=1001253030&iid=4121346>

[p.1]

Washington, DC 20515 <a href="http://lobbyingdisclosure.house.gov">http://lobbyingdisclosure.house.gov</a>	Washington, DC 20510 <a href="http://www.senate.gov/lobby">http://www.senate.gov/lobby</a>
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## LOBBYING REPORT

Lobbying Disclosure Act of 1995 (Section 5) - All Filers Are Required to Complete This Page

1. Registrant Name <input checked="" type="checkbox"/> Organization/Lobbying Firm <input type="checkbox"/> Self Employed Individual Honeywell International			
2. Address			
Address1 101 CONSTITUTION AVENUE, NW		Address2 500W	
City WASHINGTON	State DC	Zip Code 20001	Country USA
3. Principal place of business (if different than line 2)			
City	State	Zip Code	Country
4a. Contact Name		b. Telephone Number	c. E-mail
Mr. James Carroll		2026622629	rsouth@stateandfed.com
			5. Senate ID# 57453-12
7. Client Name <input checked="" type="checkbox"/> Self <input type="checkbox"/> Check if client is a state or local government or instrumentality			6. House ID# 351950000
Honeywell International			

**TYPE OF REPORT**      8. Year 2018    Q1 (1/1 - 3/31)     Q2 (4/1 - 6/30)     Q3 (7/1 - 9/30)     Q4 (10/1 - 12/31)

9. Check if this filing amends a previously filed version of this report

10. Check if this is a Termination Report       Termination Date \_\_\_\_\_      11. No Lobbying Issue Activity

### INCOME OR EXPENSES - YOU MUST complete either Line 12 or Line 13

<p style="text-align: center;"><b>12. Lobbying</b></p> <p>INCOME relating to lobbying activities for this reporting period was:</p> <p>Less than \$5,000 <input type="checkbox"/></p> <p>\$5,000 or more <input type="checkbox"/> \$ _____</p> <p>Provide a good faith estimate, rounded to the nearest \$10,000, of all lobbying related income for the client (including all payments to the registrant by any other entity for lobbying activities on behalf of the client).</p>	<p style="text-align: center;"><b>13. Organizations</b></p> <p>EXPENSE relating to lobbying activities for this reporting period were:</p> <p>Less than \$5,000 <input type="checkbox"/></p> <p>\$5,000 or more <input checked="" type="checkbox"/> \$ <u>1,110,000.00</u></p> <p><b>14. REPORTING</b> Check box to indicate expense accounting method. See instructions for description of options.</p> <p><input type="checkbox"/> <b>Method A.</b> Reporting amounts using LDA definitions only</p> <p><input type="checkbox"/> <b>Method B.</b> Reporting amounts under section 6033(b)(8) of the Internal Revenue Code</p> <p><input checked="" type="checkbox"/> <b>Method C.</b> Reporting amounts under section 162(e) of the Internal Revenue Code</p>
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### 5.3 Gifts and Hospitality

<b>Question</b>
<b>5.3.1 Does the company have a policy and/or procedure on gifts and hospitality to ensure they are bona fide to prevent undue influence or other corruption?</b>
<b>Score</b>
<b>1</b>
<b>Comments</b>
<p>Based on publicly available information, there is evidence that the company has a policy on gifts and hospitality to ensure that such business courtesies are not used as vehicles for corruption or bribery. The company’s policy acknowledges the risks associated with any gifts and hospitality, in particular when given or received as part of dealings with domestic and foreign government officials. In addition, there is evidence that the company’s policy sets clear financial limits for specific types of business courtesies and that senior approval may be required in some cases.</p> <p>However, the company receives a score of ‘1’ because although it states that all business courtesies must be appropriately documented, there is no evidence that all gifts and entertainment given or received are recorded in a central register or database that is accessible to those responsible for oversight of the process.</p>
<b>Evidence</b>
<p><b>[2] Anti-Corruption Policy - Highlights (updated 2018) (Document)</b>                  Accessed 31/05/2019  <a href="https://www.honeywell.com/content/dam/honeywell/files/code-of-conduct/Anticorruption%20Policy%202066%20pdf.pdf">https://www.honeywell.com/content/dam/honeywell/files/code-of-conduct/Anticorruption%20Policy%202066%20pdf.pdf</a>                  Gifts &amp; Hospitalities (G&amp;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&amp;H. Cash, per diems, personal services, loans, illegal or inappropriate G&amp;H are never acceptable. If the G&amp;H meets the General Rule, click here to determine whether prior approval is required. Local laws impose strict limits on G&amp;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&amp;H App. Employees have multiple ways to submit their G&amp;H request . If the G&amp;H does not meet the General Rule, employees cannot provide or accept it regardless of the value.</p> <p><b>[19] Gifts &amp; Hospitality Policy (Webpage)</b>                  Accessed 19/06/2019  <a href="https://honeywellcorpsf.secure.force.com/ghpolicy">https://honeywellcorpsf.secure.force.com/ghpolicy</a>                  Compliance Exhibit 9.1 Procedure for Business-Related Gifts and Hospitality                  In the ordinary course of business, it is often appropriate to provide certain courtesies, such as small gifts and reasonable meals, and even, sometimes, entertainment, lodging, or transportation. Nevertheless, as outlined in the Honeywell Code of Business Conduct and Anticorruption policy 2066, employees must take great care when doing so to avoid even the appearance of any conflict of interest, improper influence, bribe, favor, or kickback. Business courtesies that may be acceptable in a commercial setting may be unacceptable or even illegal when they involve government officials. In addition, failure to ensure that our customers and business partners conform to our compliance culture may compromise their ability to make objective and fair business decisions. Therefore, Honeywell employees must exercise good judgment and follow this policy for offering business-related gifts and hospitality. Additionally, under all circumstances, we must ensure that all business courtesies are properly documented in Honeywell’s records and supported with valid receipts.</p> <p><u>Who is a Government Official?</u>                  To ensure that no Honeywell business courtesies violate public corruption laws, we define “government official” broadly to include any of the following:</p> <ul style="list-style-type: none"> <li>• Any employee, officer, or person acting in an official capacity for a local or national government; a government department, agency, or instrumentality; a public international organization, like the World Bank; or a commercial enterprise owned or controlled by a government;</li> <li>• Any member of a royal or ruling family;</li> </ul>

- Any political party, and any employee or official of a political party; and
- Any candidate for public office.

Several of Honeywell's most important customers and business partners are "government officials," such as employees of Aramco, AVIC, Avicopter, China Air, Comac, Pemex, Petrobras, and Qatar Airways.

If you have questions about whether a potential recipient of a Honeywell business courtesy qualifies as a government official, consult a member of the Global Integrity and Compliance department.

Honeywell employees should never offer cash or cash equivalents as gifts.

#### Some Business Courtesies Are Never Appropriate

It is never permissible to provide business courtesies in order to improperly influence anyone, whether a government official or a commercial customer, or in exchange for any improper favor or benefit. In addition, Honeywell employees should never offer gifts of cash or cash equivalents, such as gift cards.

General Compliance Principles for Appropriate Business Courtesies All business courtesies provided to customers and business partners must conform with the following guidelines:

- Must promote Honeywell—for example, by bearing the Honeywell name or logo, or by relating either to the promotion, demonstration, or explanation of Honeywell products and/or services, or to the execution or performance of a contract;
- Must not be lavish or extravagant under the circumstances;
- Must comply with applicable law;
- Must conform with local custom and business practice;
- Must not create or give the appearance of an obligation for the recipient;
- Must be reported and documented accurately in Honeywell's records;
- May not conceivably be construed as a bribe or payoff, or be embarrassing to the company in any way; and
- Must not be solicited by the recipient.

If you wish to provide a business courtesy that does not comply with these requirements, please contact Honeywell's Global Integrity and Compliance department, which may grant waivers from these requirements in certain limited circumstances.

Contact Global Integrity & Compliance [access.integrity.helpline@honeywell.com](mailto:access.integrity.helpline@honeywell.com) 800-237-5982 For international helpline numbers, refer to <http://teamsites.honeywell.com/sites/compliance/reporting/default.aspx>

#### When Are Gifts Permitted?

Gifts may be provided to customers and business partners when appropriate under the circumstances, taking into account the type, value, and reason for the gift. In general, reasonable and appropriate gifts may be offered in connection with events such as annual holidays; recognition of special events for key officials or their companies (e.g., the 25th anniversary of the business relationship); promotional items presented in appreciation of business, as part of a visit or meeting; or tokens of respect and regard related to existing and new business relationships. Gifts of cash and cash equivalents, such as gift cards, are not permitted.

Prior approval from Honeywell's Global Integrity and Compliance function will be required if:

- You are an employee of Honeywell's Aerospace Defense & Space business; or
- The contemplated gift is intended for a government official and has a fair market value of more than \$20; or
- The gift is intended for a commercial customer and is worth more than USD \$150 per person; or
- Honeywell has provided the same recipient with gifts with a total value of more than USD \$300 in the prior twelve months.
- To facilitate this compliance review, please refer to the Honeywell Gift and Hospitality Scorecard to determine if compliance approval is required before providing the gift.

#### When Are Meals, Entertainment, and Travel Permitted?

Meals and entertainment may be offered as long as they are modest and appropriate under the circumstances. At least one Honeywell employee must be in attendance, and the meal or entertainment should be provided transparently and openly, either under circumstances that dictate that the expenditure is necessary (e.g., a working



lunch during a customer meeting), or in connection with efforts to promote Honeywell by providing an opportunity to discuss Honeywell's business (e.g., a golf outing or entertaining a customer at a sporting event with a prospective customer). Any travel benefits should closely tie to legitimate business purposes and should not involve family members of the recipient. Any entertainment that involves air travel requires a transparency letter unless waived by the General Counsel for International Transactions and Compliance.

Prior approval from Honeywell's Global Integrity and Compliance function is required if:

- You are an employee of Honeywell's Aerospace Defense & Space business and you wish to provide entertainment or travel (please refer to Policy 2055 for Business Courtesies involving US Government customers); or
- The meal, entertainment, or travel is provided to a government official; or
- With respect to commercial customers, any single meal, entertainment event, or travel benefit being provided is worth more than USD \$150 per person; or
- Honeywell has provided the recipient with any combination of meals, entertainment, and/or travel with a total value of more than USD \$600 in the prior twelve months.

Please refer to the Honeywell Gift and Hospitality Scorecard to facilitate the compliance review before offering the meal, entertainment, or travel.

In the case of a factory acceptance test or other scheduled event, which may involve some combination of travel, meals, and/or entertainment, only one global approval for the entire event is required; it is not necessary to seek separate approval for each component of the event.

#### When Is It Permissible to Accept a Gift, Meal, Entertainment, or Travel Benefit?

The guidelines for receiving gifts from customers, business partners, and suppliers closely mirror the principles outlined above for providing such business courtesies. Honeywell employees must not accept any gift, favor, or hospitality that is not appropriate under the circumstances, taking into account the type, value, and reason for the courtesy. No Honeywell employee should ever solicit a business courtesy, or accept any courtesy that would be embarrassing to the company if it were made public. Gifts should not be accepted from business partners or potential business partners during or in connection with contract negotiations.

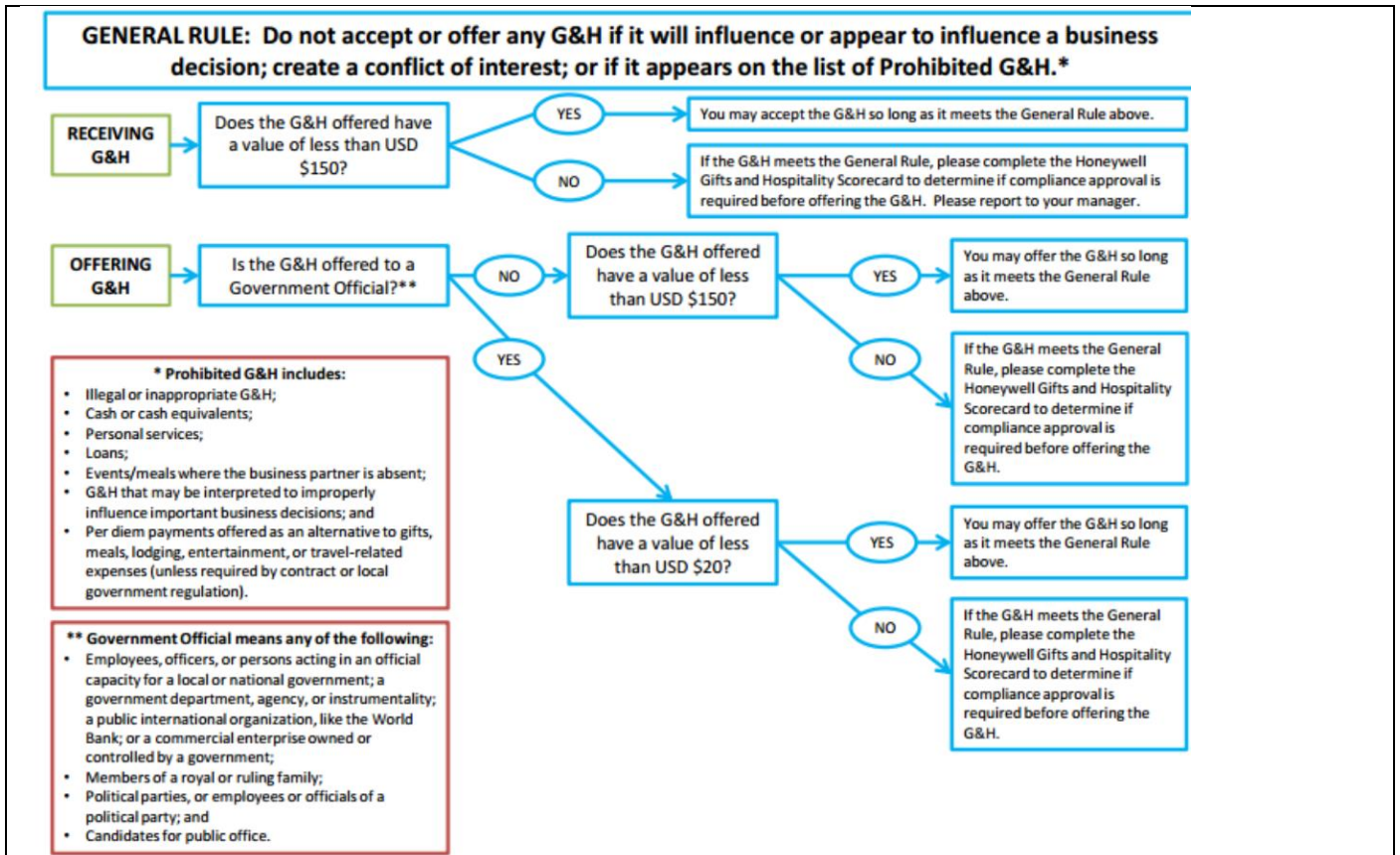
If you are unsure whether you should accept a business gift, meal, entertainment, or travel benefit, you should seek guidance from your supervisor, the Global Integrity and Compliance department, or the Law department. Before accepting any gift, meal, entertainment, or travel benefit, you should ensure that it conforms to applicable local law and custom, and that it cannot be construed as a bribe, payoff, or kickback. Generally, you may accept a gift, favor, or entertainment as long as it:

- Is not solicited;
- Is of nominal value, and does not exceed generally accepted local business practices;
- Does not create or give the appearance of imposing an obligation on the recipient;
- Cannot be construed as a bribe or payoff; and
- Does not violate applicable law, Company policies or the policies of the recipient's company.

If you are offered a business courtesy with a monetary value of more than USD \$150, you should report it to your supervisor for approval before proceeding, and you should accept it only if it otherwise complies with the general principles outlined in this policy. Please refer to the Honeywell Gift and Hospitality Scorecard to facilitate the compliance review

These rules do not prohibit you from accepting unsolicited promotional materials of a general advertising nature, such as imprinted pencils, memo pads and calendars, so long as what is given does not create or appear to create any obligation.

Additionally, in keeping with local custom, your participation in ceremonial presentations may be permitted as long as what is accepted is not in violation of any law, cannot be viewed as a bribe, and would not embarrass you or Honeywell if disclosed.



**[1] Code of Business Conduct (Updated 2018) (Document)**

Accessed 31/05/2019

[https://www.honeywell.com/content/dam/honeywell/files/code-of-conduct/Code\\_of\\_Business\\_Conduct\\_2018\\_English%20pdf.pdf](https://www.honeywell.com/content/dam/honeywell/files/code-of-conduct/Code_of_Business_Conduct_2018_English%20pdf.pdf)

**[p.23] Conflicts of Interest**

The following sections describe situations that may create conflicts of interest. It is important to remember that conflicts may also be created when a member of your household or immediate family is the individual involved.

**[p.23] Gifts and Business Entertainment**

Developing strong working relationships with our customers, suppliers, and other business partners is important to our growth. Business gifts and entertainment are sometimes used to strengthen these bonds. However, we must exercise particular caution when offering or accepting business courtesies. Exchanging gifts and entertainment can result in conflicts of interests. If not handled properly, they also may lead to the appearance of improper payments, kickbacks or corruption. You may not accept or provide any gift, favor or entertainment if it is made for an improper purpose, or if you know it would violate our policies, the law or the gift policy of the recipient’s company. Generally, we can offer or accept a gift, favor, or entertainment, as long as it:

- Does not make the recipient feel obligated or give the appearance of an obligation
- Does not exceed generally accepted local business practices
- Is of nominal value
- Cannot be construed as a bribe or payoff
- Does not violate applicable law, Company policies, or the policies of the recipient’s company
- Is not solicited

These rules do not apply to unsolicited promotional materials of a general advertising nature, such as imprinted pencils, memo pads, and calendars, so long as what is given does not create or appear to create any obligation. Additionally, in keeping with national custom, ceremonial presentations may be permitted as long as what is accepted is not in violation of any law, cannot be viewed as a bribe, and would not embarrass you or Honeywell if disclosed. Gifts should not be accepted from suppliers or potential suppliers (or other business partners or potential business partners) during or in connection with contract negotiations with the supplier. In addition, we should avoid soliciting gifts from suppliers or other business partners for Honeywell functions or employee awards. If you are

unsure whether you should offer or accept a business gift or entertainment, you should seek guidance. Customer entertainment and gifts must be discussed in advance with your supervisor.

Stricter laws govern gifts offered or made to government officials. These laws apply not only to government officials, but also to employees of state-owned or state-controlled companies. You must comply strictly with these laws and regulations. Never offer or accept a business courtesy if doing so violates a law or regulation, will cause embarrassment for Honeywell, or will reflect negatively on the Company’s reputation.

For more information, see the “No Commercial Bribery and No Improper Payments to Government Officials” section of our Code and our policies on Business Courtesies for U.S. Government Officials, Government Relations, and Anticorruption. If you have any questions or concerns please consult the Law Department.

[p.24] Q: At an offsite meeting, a vendor who has been providing services to Honeywell for several months invites Denisha to lunch. She accepts, allowing the vendor to pay for the meal. Are her actions acceptable?

A: Occasional meals and nominal gifts are ordinarily acceptable, so long as they don’t raise a question about Denisha’s objectivity. Customer entertainment and gifts should be discussed in advance with your supervisor. The supervisor should evaluate the business purpose for the meal, the setting and the cost of the meal, and the frequency of the vendor’s invitations.

Q: Anna is planning a VIP event for customers, both private and government, where meals and gifts will be provided to the attendees. Local laws restrict the value of gifts and hospitality to some government officials, which means that some attendees cannot receive the meals and/or gifts. Anna thinks it would be disrespectful to the guests if some did not receive the gift, so she wants to proceed with giving all attendees the same gifts. What should Anna do?

A: In general, Honeywell employees can provide gifts and hospitality in accordance with Honeywell’s policies and applicable laws. In this case, there are legal restrictions on the value of gifts and hospitalities to certain government officials with which Honeywell must comply. Anna should reach out to the Global Integrity & Compliance Department for guidance and approval before proceeding with the event and should not disregard the local law restrictions.

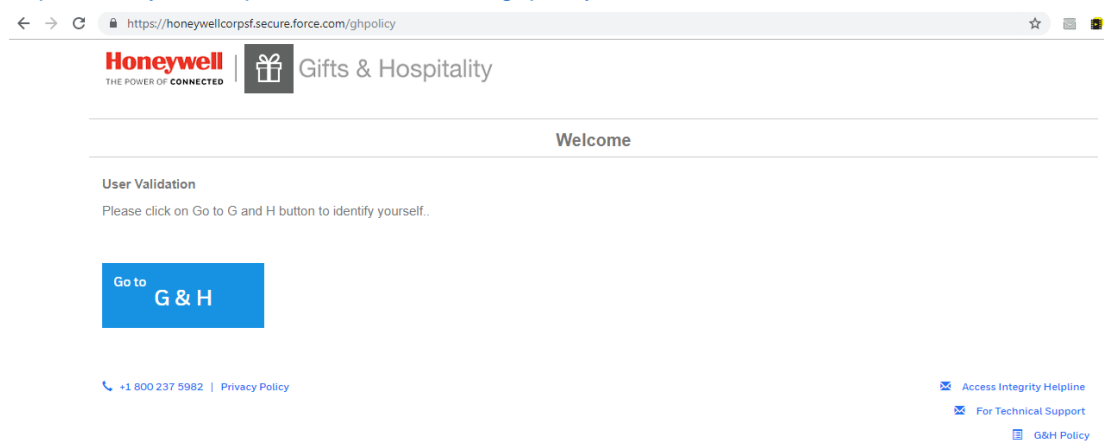
[p.38] No Commercial Bribery and No Improper Payments to Foreign Officials

In addition to avoiding commercial bribery and unlawful kickbacks, we comply with all applicable anticorruption laws regarding improper payments to government officials. “Improper payments” include both direct and indirect payments, or an offer, promise or authorization of a payment or anything of value to a government official for purposes of improperly influencing government acts or decisions in order to obtain or retain business or otherwise secure a business advantage. Note that improper payments can take the form of cash, gifts, or lavish entertainment. “Government officials” include officials of government entities, international organizations and political parties, employees of state-owned companies, and even employees of government-owned or controlled companies and joint venture partners.

**[13] Gifts and Hospitality Submissions Page (Webpage)**

Accessed 02/06/2019

<https://honeywellcorpsf.secure.force.com/ghpolicy>



The screenshot shows a web browser window with the URL <https://honeywellcorpsf.secure.force.com/ghpolicy>. The page header features the Honeywell logo and the text 'Gifts & Hospitality'. Below the header, there is a 'Welcome' message. A 'User Validation' section contains the instruction 'Please click on Go to G and H button to identify yourself.' and a prominent blue button labeled 'Go to G & H'. The footer includes contact information: '+1 800 237 5982 | Privacy Policy' and three links: 'Access Integrity Helpline', 'For Technical Support', and 'G&H Policy'.



## 6. Supply Chain Management

Question
6.1. Does the company require the involvement of its procurement department in the establishment of new supplier relationships and in the oversight of its supplier base?
Score
1
Comments
<p>Based on publicly available information, there is evidence that the company's procurement department is involved in the establishment and oversight of supplier relationships. The company states that employees must work with the Legal and Procurement Departments before appointing new suppliers, and it is clear that all agreements or purchase orders must be authorised and issued by procurement representatives.</p> <p>However, the company receives a score of '1' because there is no evidence that the company assures itself that the proper procurement procedures are being followed in practice, though regular audit or other means.</p>
Evidence
<p><b>[2] Anti-Corruption Policy - Highlights (updated 2018) (Document)</b>  <b>Accessed 31/05/2019</b>  <a href="https://www.honeywell.com/content/dam/honeywell/files/code-of-conduct/Anticorruption%20Policy%202066%20pdf.pdf">https://www.honeywell.com/content/dam/honeywell/files/code-of-conduct/Anticorruption%20Policy%202066%20pdf.pdf</a>            [p.3] <u>Suppliers</u>            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.</p> <p><b>[20] Honeywell Standard Purchase Order Terms and Conditions for Goods and Services (updated 2014) (Document)</b>  <a href="https://sensing.honeywell.com/sc-purchase-order-tc-ac-s-rev-aug-2009-v2-updated-feb-2014.pdf">https://sensing.honeywell.com/sc-purchase-order-tc-ac-s-rev-aug-2009-v2-updated-feb-2014.pdf</a>            [p.1] No change to or modification of this Purchase Order will be binding upon Honeywell unless in writing, specifically identifying that it amends this Purchase Order, and signed, or approved electronically, by an authorized procurement representative of Honeywell.</p>

<b>Question</b>
<b>6.2 Does the company conduct risk-based anti-bribery and corruption due diligence when engaging or re-engaging with its suppliers?</b>
<b>Score</b>
1
<b>Comments</b>
<p>The company publicly states that it carries out due diligence into certain types of suppliers. The company also states that failure to comply with the its Supplier Code of Conduct could result in a termination of the business relationship.</p> <p>However, the company receives a score of ‘1’ because it does not provide further publicly available details on its due diligence procedures, for example whether it aims to establish ultimate beneficial ownership of suppliers or whether it conducts enhanced due diligence on high risk suppliers. There is also no clear evidence that the company may be willing to not engage or terminate its relationship with a supplier if any red flags highlighted in the due diligence cannot be mitigated.</p>
<b>Evidence</b>
<p><b>[2] Anti-Corruption Policy - Highlights (updated 2018) (Document)</b>  <b>Accessed 31/05/2019</b>  <a href="https://www.honeywell.com/content/dam/honeywell/files/code-of-conduct/Anticorruption%20Policy%202066%20pdf.pdf">https://www.honeywell.com/content/dam/honeywell/files/code-of-conduct/Anticorruption%20Policy%202066%20pdf.pdf</a>  [p.3] <u>Suppliers</u>  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.</p> <p><b>[9] Supplier Code of Conduct 2016 (Document)</b>  <b>Accessed 01/06/2019</b>  <a href="https://www.honeywell.com/content/dam/honeywell/files/code-of-conduct/Supplier%20Code%20of%20Business%20Conduct%20pdf.pdf">https://www.honeywell.com/content/dam/honeywell/files/code-of-conduct/Supplier%20Code%20of%20Business%20Conduct%20pdf.pdf</a>  [p.1] 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. 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.</p> <p><b>[1] Code of Business Conduct (Updated 2018) (Document)</b>  <b>Accessed 31/05/2019</b>  <a href="https://www.honeywell.com/content/dam/honeywell/files/code-of-conduct/Code_of_Business_Conduct_2018_English%20pdf.pdf">https://www.honeywell.com/content/dam/honeywell/files/code-of-conduct/Code_of_Business_Conduct_2018_English%20pdf.pdf</a>  [p.45] <u>Seeking Long-Term Supplier Relationships</u>  Together, we strive to build long-term relationships with our suppliers. We only use legitimate, business-related criteria when choosing suppliers. Our Company will enter into representation or supplier agreements only with companies believed to have demonstrated a record of and commitment to integrity.</p>

<b>Question</b>
<b>6.3 Does the company require all of its suppliers to have adequate standards of anti-bribery and corruption policies and procedures in place?</b>
<b>Score</b>
1
<b>Comments</b>
<p>Based on publicly available information, there is evidence that the company requires that its suppliers adhere to ethics and anti-corruption principles and to certain compliance procedures. The company indicates that such required procedures include a clear ban on commercial bribery and training for employees, and states that staff of suppliers may use its reporting mechanisms. There is evidence that the company may take measures to assure itself of supplier compliance with its ethics and anti-corruption standards, for example through the possibility of site visits or audits of supplier facilities.</p> <p>However, the company receives a score of ‘1’ because there is no publicly available evidence that its standards for suppliers include prohibiting facilitation payments and procedures to address conflicts of interest, gifts and hospitality, and whistleblowing. It is also not clear that the company assures itself of its suppliers’ standards for all entities and on a regular basis or when there is a significant change in the business relationship.</p>
<b>Evidence</b>
<p><b>[9] Supplier Code of Conduct 2016 (Document)</b>  <b>Accessed 01/06/2019</b>  <a href="https://www.honeywell.com/content/dam/honeywell/files/code-of-conduct/Supplier%20Code%20of%20Business%20Conduct%20pdf.pdf">https://www.honeywell.com/content/dam/honeywell/files/code-of-conduct/Supplier%20Code%20of%20Business%20Conduct%20pdf.pdf</a></p> <p>[p.1] 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. 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.</p> <p>[p.4] <u>Business Integrity</u> 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 service. Suppliers also agree to maintain integrity, transparency and accuracy in corporate record keeping.</p> <p>[p.5] <u>Management System</u>  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 (a) compliance with applicable laws, regulations and customer requirements; (b) conformance with this Supplier Code; (c) mitigation of risks, and (d) a process to track, measure and drive improvements in the management system.</p> <p>The management system should contain at a minimum the following elements:  [...]</p> <ul style="list-style-type: none"> <li>• 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.</li> <li>• Standards, Audits and Assessments to ensure conformity to legal and regulatory requirements, the content of the Supplier Code and customer contractual requirements.</li> <li>• Corrective Action Process for timely correction of deficiencies identified by internal or external assessments, inspections, investigations and reviews.</li> <li>• Documentation and Records to ensure compliance with the principles of this Supplier Code.</li> </ul> <p>[p.6] <u>Reporting Concerns</u>  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</p>

Honeywell supplier and possible legal action. You may make a report using the Honeywell ACCESS Integrity Helpline: Calling: 800-237-5982 Mailing: Honeywell International Attention: ACCESS Helpline 115 Tabor Road Morris Plains, N.J. 07950 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.

**[1] Code of Business Conduct (Updated 2018) (Document)**

**Accessed 31/05/2019**

[https://www.honeywell.com/content/dam/honeywell/files/code-of-conduct/Code\\_of\\_Business\\_Conduct\\_2018\\_English%20pdf.pdf](https://www.honeywell.com/content/dam/honeywell/files/code-of-conduct/Code_of_Business_Conduct_2018_English%20pdf.pdf)

[p.12] Who Must Follow Our Code

Our Code applies to all employees, officers and directors of Honeywell. Where appropriate, business partners working on our Company's behalf should also familiarize themselves with and follow our Code. If your job responsibilities require you to interact with representatives working on behalf of Honeywell, be sure to inform them of their responsibility to act in accordance with this Code and provide them with a copy. Their behavior must be consistent with our Code, other Honeywell policies, and applicable laws and regulations.

[p.45] Seeking Long-Term Supplier Relationships Together, we strive to build long-term relationships with our suppliers. We only use legitimate, business-related criteria when choosing suppliers. Our Company will enter into representation or supplier agreements only with companies believed to have demonstrated a record of and commitment to integrity.

<b>Question</b>
<b>6.4 Does the company ensure that its suppliers require all their sub-contractors to have anti-corruption programmes in place that at a minimum adhere to the standards established by the main contractor?</b>
<b>Score</b>
<b>2</b>
<b>Comments</b>
<p>There is evidence that the company takes steps to ensure that the standards outlined in its Supplier Code of Conduct, including anti-bribery and corruption provisions, are communicated to sub-contractors throughout the supply chain. The company indicates that all suppliers should have a management system in place which includes a clear process to communicate the standards of its Supplier Code and procedures to monitor compliance with these standards. The company states that it expects these standards from all suppliers.</p>
<b>Evidence</b>
<p><b>[9] Supplier Code of Conduct 2016 (Document)</b>  <b>Accessed 01/06/2019</b>  <a href="https://www.honeywell.com/content/dam/honeywell/files/code-of-conduct/Supplier%20Code%20of%20Business%20Conduct%20pdf.pdf">https://www.honeywell.com/content/dam/honeywell/files/code-of-conduct/Supplier%20Code%20of%20Business%20Conduct%20pdf.pdf</a>                  [p.1] 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.</p> <p>[p.2] 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.</p> <p>[p.5] <u>Management System</u>                  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 (a) compliance with applicable laws, regulations and customer requirements; (b) conformance with this Supplier Code; (c) mitigation of risks, and (d) a process to track, measure and drive improvements in the management system.</p> <p>The management system should contain at a minimum the following elements:                  [...]</p> <ul style="list-style-type: none"> <li>• A Process to Communicate Supplier Code Requirements to Suppliers and monitor supplier compliance to the Supplier Code of Conduct.</li> </ul> <p><b>[16] Proxy Statement 2018 (Document)</b>  <b>Accessed 02/06/2019</b>  <a href="http://investor.honeywell.com/Interactive/newlookandfeel/4121346/proxy-2018/images/Honeywell-Proxy2018.pdf">http://investor.honeywell.com/Interactive/newlookandfeel/4121346/proxy-2018/images/Honeywell-Proxy2018.pdf</a>                  [p.2] Moreover, the Integrity and Compliance program includes, among other elements, a supplier Code of Conduct that flows down to Honeywell’s global supply chain to reinforce Honeywell’s expectation that its suppliers will also abide by our high standards of integrity and compliance, including our Conflict Minerals, Anti-Human Trafficking, Business Integrity, and Health, Safety, and Environmental policies.</p>

<b>Question</b>
<b>6.5 Does the company publish high-level results from ethical incident investigations and disciplinary actions against suppliers?</b>
<b>Score</b>
<b>0</b>
<b>Comments</b>
There is no publicly available evidence that the company publishes data on ethics or corruption-related reports, investigations and disciplinary actions involving its suppliers.
<b>Evidence</b>
No evidence found.

## 7. Agents, Intermediaries and Joint Ventures

### 7.1 Agents and Intermediaries

<b>Question</b>
7.1.1 Does the company have a clear policy on the use of agents?
<b>Score</b>
2
<b>Comments</b>
<p>There is evidence that the company has a clear policy on the use of agents which addresses the corruption risks associated with their use and provides details of specific controls to mitigate these risks. As part of this policy, the company commits to establishing and verifying that the use of an agent is, in each case, necessary to perform a legitimate business function. The company states that its policy applies to all divisions within the organisation, as well as subsidiaries and joint ventures.</p>
<b>Evidence</b>
<p><b>[1] Code of Business Conduct (Updated 2018) (Document)</b>                  Accessed 31/05/2019  <a href="https://www.honeywell.com/content/dam/honeywell/files/code-of-conduct/Code_of_Business_Conduct_2018_English%20pdf.pdf">https://www.honeywell.com/content/dam/honeywell/files/code-of-conduct/Code_of_Business_Conduct_2018_English%20pdf.pdf</a>                  [p.43] <u>Interacting with Government Customers</u>                  • We must ensure we only use reputable consultants, sales agents, or other professional service independent contractors for legitimate legal purposes.</p> <p><b>[2] Anti-Corruption Policy - Highlights (updated 2018) (Document)</b>                  Accessed 31/05/2019  <a href="https://www.honeywell.com/content/dam/honeywell/files/code-of-conduct/Anticorruption%20Policy%202066%20pdf.pdf">https://www.honeywell.com/content/dam/honeywell/files/code-of-conduct/Anticorruption%20Policy%202066%20pdf.pdf</a>                  [p.3] <u>Introduction</u>                  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.</p> <p>[p.3] <u>Sales Intermediaries</u>                  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.</p> <p>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 &amp; Compliance Department.</p>

<b>Question</b>
<b>7.1.2 Does the company conduct risk-based anti-bribery and corruption due diligence when engaging or re-engaging its agents and intermediaries?</b>
<b>Score</b>
<b>1</b>
<b>Comments</b>
<p>There is evidence that the company conducts anti-corruption-focused due diligence when engaging and re-engaging with its agents and sales intermediaries.</p> <p>However, the company does not provide further publicly available evidence to indicate whether it conducts and refreshes the due diligence on its intermediaries at least every two years or when there is a significant change in the business relationship. In addition, there is no evidence that the company has provisions to conduct enhanced due diligence on the high risk agents, nor that it may be willing to not engage or terminate its relationship with intermediaries where risks identified in the due diligence cannot be mitigated.</p>
<b>Evidence</b>
<p><b>[1] Code of Business Conduct (Updated 2018) (Document)</b>  <b>Accessed 31/05/2019</b>  <a href="https://www.honeywell.com/content/dam/honeywell/files/code-of-conduct/Code_of_Business_Conduct_2018_English%20pdf.pdf">https://www.honeywell.com/content/dam/honeywell/files/code-of-conduct/Code_of_Business_Conduct_2018_English%20pdf.pdf</a>                  [p.38] No Commercial Bribery and No Improper Payments to Government Officials                  Never retain a third party to make an improper payment to a government official or enter into any transaction where you suspect a third party is making such payments. Doing so violates our Code and anticorruption laws. We must carefully screen all third parties using our due diligence procedures before retaining them.</p> <p><b>[2] Anti-Corruption Policy - Highlights (updated 2018) (Document)</b>  <b>Accessed 31/05/2019</b>  <a href="https://www.honeywell.com/content/dam/honeywell/files/code-of-conduct/Anticorruption%20Policy%202066%20pdf.pdf">https://www.honeywell.com/content/dam/honeywell/files/code-of-conduct/Anticorruption%20Policy%202066%20pdf.pdf</a>                  [p.3] 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:</p> <ul style="list-style-type: none"> <li>• Any third party receiving a commission, success fee, retainer;</li> <li>• If Honeywell sets the terms and conditions for sales to the Customer;</li> <li>• Honeywell attends meetings with the SI and Customer; or</li> <li>• Government interaction is needed to facilitate sales.</li> </ul> <p>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 &amp; Compliance Department.</p>



<b>Question</b>
<b>7.1.3 Does the company aim to establish the ultimate beneficial ownership of its agents and intermediaries?</b>
<b>Score</b>
<b>0</b>
<b>Comments</b>
There is no publicly available evidence that the company aims to establish the beneficial ownership of its agents and intermediaries as part of its due diligence process.
<b>Evidence</b>
No evidence found.

<b>Question</b>
<b>7.1.4 Does the company’s anti-bribery and corruption policy apply to all agents and intermediaries acting for or on behalf of the company, and does it require anti-bribery and corruption clauses in its contracts with these entities?</b>
<b>Score</b>
<b>0</b>
<b>Comments</b>
<p>There is some evidence that all of the company’s third parties must comply with its Anti-Corruption Policy, as well as with relevant anti-corruption laws and regulations. In addition, the company’s Code of Business Conduct states that its rules – which outline the company’s anti-bribery and corruption policy – apply to all third parties working on behalf of the company. However, there is no publicly available evidence that the company takes steps to ensure that its third parties adhere to these standards by requiring anti-corruption clauses in contracts with its agents, with clear audit and termination rights.</p>
<b>Evidence</b>
<p><b>[2] Anti-Corruption Policy - Highlights (updated 2018) (Document)</b>  <b>Accessed 31/05/2019</b>  <a href="https://www.honeywell.com/content/dam/honeywell/files/code-of-conduct/Anticorruption%20Policy%202066%20pdf.pdf">https://www.honeywell.com/content/dam/honeywell/files/code-of-conduct/Anticorruption%20Policy%202066%20pdf.pdf</a>                  [p.3] <u>Introduction</u>                  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 Anti-Corruption Policy 2066 (Policy) and the Honeywell’s Code of Business Conduct prohibit bribery in any form.</p> <p><b>[1] Code of Business Conduct (Updated 2018) (Document)</b>  <b>Accessed 31/05/2019</b>  <a href="https://www.honeywell.com/content/dam/honeywell/files/code-of-conduct/Code_of_Business_Conduct_2018_English%20pdf.pdf">https://www.honeywell.com/content/dam/honeywell/files/code-of-conduct/Code_of_Business_Conduct_2018_English%20pdf.pdf</a>                  [p.12] <u>Who Must Follow Our Code</u>                  Our Code applies to all employees, officers and directors of Honeywell. Where appropriate, business partners working on our Company’s behalf should also familiarize themselves with and follow our Code. If your job responsibilities require you to interact with representatives working on behalf of Honeywell, be sure to inform them of their responsibility to act in accordance with this Code and provide them with a copy. Their behavior must be consistent with our Code, other Honeywell policies, and applicable laws and regulations</p> <p>[p.35] Never retain a third party to make an improper payment to a government official or enter into any transaction where you suspect a third party is making such payments. Doing so violates our Code and anticorruption laws. We must carefully screen all third parties using our due diligence procedures before retaining them. For more information please see our Anticorruption Policy.</p>

<b>Question</b>
<b>7.1.5 Does the company ensure that its incentive schemes for agents are designed in such a way that they promote ethical behaviour and discourage corrupt practices?</b>
<b>Score</b>
<b>1</b>
<b>Comments</b>
<p>There is some evidence that the company acknowledges incentive structures for agents as a risk factor in bribery and corruption risk. The company indicates that any third party receiving a commission or similar success fee must go through a clear due diligence process, with approval from the Global Integrity and Compliance Department.</p> <p>However, the company receives a score of ‘1’ because it does not provide further publicly available information on the specific controls that it has in place to reduce these risks, such as imposing a threshold on the payment of sales commissions to agents, or requiring that remuneration is paid in stage payments or into local bank accounts.</p>
<b>Evidence</b>
<p><b>[2] Anti-Corruption Policy - Highlights (updated 2018) (Document)</b>  <b>Accessed 31/05/2019</b>  <a href="https://www.honeywell.com/content/dam/honeywell/files/code-of-conduct/Anticorruption%20Policy%202066%20pdf.pdf">https://www.honeywell.com/content/dam/honeywell/files/code-of-conduct/Anticorruption%20Policy%202066%20pdf.pdf</a>                      [p.3] 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:</p> <ul style="list-style-type: none"> <li>• Any third party receiving a commission, success fee, retainer;</li> <li>• If Honeywell sets the terms and conditions for sales to the Customer;</li> <li>• Honeywell attends meetings with the SI and Customer; or</li> <li>• Government interaction is needed to facilitate sales.</li> </ul> <p>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 &amp; Compliance Department.</p>

<b>Question</b>
<b>7.1.6 Does the company publish details of all agents currently contracted to act with and on behalf of the company?</b>
<b>Score</b>
<b>0</b>
<b>Comments</b>
There is no evidence that the company publishes any details of the agents contracted to act for or on its behalf.
<b>Evidence</b>
No evidence found.

<b>Question</b>
<b>7.1.7 Does the company publish high-level results from incident investigations and sanctions applied against agents?</b>
<b>Score</b>
<b>0</b>
<b>Comments</b>
There is no evidence that the company publishes any data on ethics and corruption-related reports, investigations and disciplinary actions involving its contracted agents.
<b>Evidence</b>
No evidence found.

## 7.2 Joint Ventures

Question
<b>7.2.1 Does the company conduct risk-based anti-bribery and corruption due diligence when entering into and operating as part of joint ventures?</b>
Score
<b>1</b>
Comments
<p>Based on publicly available information, there is evidence that the company has formal procedures in place to conduct anti-corruption-focused due diligence on all joint venture partners.</p> <p>However, the company receives a score of ‘1’ because there is no clear publicly available evidence that these due diligence checks include establishing the beneficial ownership of partner entities, nor is it clear whether the company has a risk-based approach to conduct enhanced due diligence on joint ventures operating in high risk markets or with high risk partners. It is also not clear how frequently due diligence into joint venture partners is conducted or refreshed.</p>
Evidence
<p><b>[2] Anti-Corruption Policy - Highlights (updated 2018) (Document)</b>  <b>Accessed 31/05/2019</b>  <a href="https://www.honeywell.com/content/dam/honeywell/files/code-of-conduct/Anticorruption%20Policy%202066%20pdf.pdf">https://www.honeywell.com/content/dam/honeywell/files/code-of-conduct/Anticorruption%20Policy%202066%20pdf.pdf</a>                      [p.4] <u>5. M&amp;A and Joint Ventures</u>                      M&amp;A and Joint Ventures Acquisitions cannot be completed before Due Diligence has been successfully conducted. Employees should work with the Global Integrity &amp; Compliance and M&amp;A Department to complete Due Diligence and the actions outlined in the M&amp;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 &amp; Compliance and the M&amp;A Department to complete Due Diligence.</p> <p><b>[1] Code of Business Conduct (Updated 2018) (Document)</b>  <b>Accessed 31/05/2019</b>  <a href="https://www.honeywell.com/content/dam/honeywell/files/code-of-conduct/Code_of_Business_Conduct_2018_English%20pdf.pdf">https://www.honeywell.com/content/dam/honeywell/files/code-of-conduct/Code_of_Business_Conduct_2018_English%20pdf.pdf</a>                      [p.38] <u>No Commercial Bribery and No Improper Payments to Government Officials</u>                      We must carefully screen all third parties using our due diligence procedures before retaining them. For more information please see our Anticorruption Policy.</p>

<b>Question</b>
<b>7.2.2 Does the company commit to incorporating anti-bribery and corruption policies and procedures in all of its joint venture relationships, and does it require anti-bribery and corruption clauses in its contracts with joint venture partners?</b>
<b>Score</b>
<b>0</b>
<b>Comments</b>
There is no publicly available evidence that the company requires anti-corruption clauses in its contracts with joint venture partners, nor that the company has policies to incorporate anti-bribery and corruption policies in all of its joint ventures. The company indicates that joint ventures and acquired companies must follow its procedures on integrity and anti-corruption, but it does not provide further information on how it ensures compliance in practice.
<b>Evidence</b>
<p><b>[3] Integrity and Compliance (Webpage)</b>  <b>Accessed 31/05/2019</b>  <a href="https://www.honeywell.com/content/honeywell/us/en/company/integrity-and-compliance">https://www.honeywell.com/content/honeywell/us/en/company/integrity-and-compliance</a></p> <p><b>KEY ELEMENTS</b>  Robust integration processes to ensure that newly acquired companies understand and comply with Honeywell policies and procedures.</p> <p><b>[2] Anti-Corruption Policy - Highlights (updated 2018) (Document)</b>  <b>Accessed 31/05/2019</b>  <a href="https://www.honeywell.com/content/dam/honeywell/files/code-of-conduct/Anticorruption%20Policy%202066%20pdf.pdf">https://www.honeywell.com/content/dam/honeywell/files/code-of-conduct/Anticorruption%20Policy%202066%20pdf.pdf</a>  [p.1] Introduction</p> <p>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 Honeywell’s Code of Business Conduct prohibit bribery in any form.</p>

<b>Question</b>
<b>7.2.3 Does the company commit to take an active role in preventing bribery and corruption in all of its joint ventures?</b>
<b>Score</b>
<b>0</b>
<b>Comments</b>
There is no publicly available evidence that the company commits to take an active role in preventing bribery and corruption in all of its joint ventures, for example by providing dedicated anti-corruption training to joint venture staff or seconding employees to leadership or other key positions in the joint venture.
<b>Evidence</b>
<p><b>[2] Anti-Corruption Policy - Highlights (updated 2018) (Document)</b>  <b>Accessed 31/05/2019</b>  <a href="https://www.honeywell.com/content/dam/honeywell/files/code-of-conduct/Anticorruption%20Policy%202066%20pdf.pdf">https://www.honeywell.com/content/dam/honeywell/files/code-of-conduct/Anticorruption%20Policy%202066%20pdf.pdf</a>                      [p.1] Introduction</p> <p>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 Honeywell’s Code of Business Conduct prohibit bribery in any form.</p>



## 8. Offsets

<b>Question</b>
<b>8.1 Does the company explicitly address the corruption risks associated with offset contracting, and is a dedicated body, department or team responsible for oversight of the company's offset activities?</b>
<b>Score</b>
<b>0</b>
<b>Comments</b>
There is no publicly available evidence that the company addresses the corruption risks associated with offsets contracting, nor is there evidence that a specific team or department is responsible for managing the company's offset activities. There is no evidence that the company publishes a statement that it does not engage in offset contracting.
<b>Evidence</b>
No evidence found.

<b>Question</b>
<b>8.2 Does the company conduct risk-based anti-bribery and corruption due diligence on all aspects of its offset obligations, which includes an assessment of the legitimate business rationale for the investment?</b>
<b>Score</b>
<b>0</b>
<b>Comments</b>
There is no publicly available evidence that the company conducts risk-based anti-bribery and corruption due diligence on all aspects of its offset obligations.
<b>Evidence</b>
No evidence found.

<b>Question</b>
<b>8.3 Does the company publish details of all offset agents and brokers currently contracted to act with and/or on behalf of the company?</b>
<b>Score</b>
<b>0</b>
<b>Comments</b>
There is no evidence that the company publishes any details of agents, brokers or consultancy firms contracted to act with and on behalf of its offset programme.
<b>Evidence</b>
No evidence found.

<b>Question</b>
<b>8.4 Does the company publish details about the beneficiaries of its indirect offset projects?</b>
<b>Score</b>
<b>0</b>
<b>Comments</b>
There is no evidence that the company publishes any details about its offset projects.
<b>Evidence</b>
No evidence found.

## 9. High Risk Markets

Question
<b>9.1 Does the company have enhanced risk management procedures in place for the supply of goods or services to markets or customers in countries identified as at a high risk of corruption?</b>
Score
<b>0</b>
Comments
<p>There is some evidence that the company acknowledges the risks of operating in different markets. However, there is no clear publicly available evidence that the company has a corruption risk assessment and management procedure in place to identify these specific risks, nor is it clear that the results of risk assessments have a direct impact on business decisions.</p>
Evidence
<p><b>[8] Annual Report 2018</b>  <b>Accessed 31/05/2019</b>  <a href="http://investor.honeywell.com/Cache/1500118299.PDF?O=PDF&amp;T=&amp;Y=&amp;D=&amp;FID=1500118299&amp;iid=4121346">http://investor.honeywell.com/Cache/1500118299.PDF?O=PDF&amp;T=&amp;Y=&amp;D=&amp;FID=1500118299&amp;iid=4121346</a>  <p>[p.7] An increasing percentage of our sales and operations is in non-U.S. jurisdictions and is subject to the economic, political, regulatory, foreign exchange and other risks of international operations.</p> <p>Our international operations, including U.S. exports, represent more than half of the Company's sales. Risks related to international operations include exchange control regulations, wage and price controls, antitrust regulations, employment regulations, foreign investment laws, import, export and other trade restrictions (such as sanctions and embargoes), violations by our employees of anticorruption laws (despite our efforts to mitigate these risks), changes in regulations regarding transactions with state-owned enterprises, nationalization of private enterprises, acts of terrorism, and our ability to hire and maintain qualified staff and maintain the safety of our employees in these regions.</p> <p>Instability and uncertainties arising from the global geopolitical environment, and the evolving international and domestic political, regulatory and economic landscape, the potential for changes in global trade policies including sanctions and trade barriers, trends such as populism, economic nationalism and negative sentiment toward multinational companies, and the cost of compliance with increasingly complex and often conflicting regulations worldwide can impair our flexibility in modifying product, marketing, pricing or other strategies for growing our businesses, as well as our ability to improve productivity and maintain acceptable operating margins.</p> <p><b>[3] Integrity and Compliance (Webpage)</b>  <b>Accessed 31/05/2019</b>  <a href="https://www.honeywell.com/content/honeywell/us/en/company/integrity-and-compliance">https://www.honeywell.com/content/honeywell/us/en/company/integrity-and-compliance</a></p> <ul style="list-style-type: none"> <li>Tools to help ensure that orders only are accepted from, and shipments made to, countries or persons not under sanctions.</li> </ul> <p><b>[16] Proxy Statement 2018 (Document)</b>  <b>Accessed 02/06/2019</b>  <a href="http://investor.honeywell.com/Interactive/newlookandfeel/4121346/proxy-2018/images/Honeywell-Proxy2018.pdf">http://investor.honeywell.com/Interactive/newlookandfeel/4121346/proxy-2018/images/Honeywell-Proxy2018.pdf</a>  <p>[p.7] <u>Director Skills and Qualification Criteria – Global Experience</u>  Growing revenues outside of the United States, particularly in what we call “high growth regions” or “HGRs” such as China, India, Southeast Asia, Africa and Latin America is a central part of our long-term strategy for growth</p> </p> </p>

**Question**

**9.2 Does the company disclose details of all of its fully consolidated subsidiaries and non-fully consolidated holdings (associates, joint ventures and other related entities)?**

**Score**

**1**

**Comments**

There is evidence that the company publishes a list of its fully consolidated and majority-held subsidiaries. For each entity, the company provides details of its percentage ownership and the country of incorporation. The company publishes this information on at least an annual basis.

However, the company receives a score of ‘1’ because there is no publicly available evidence that it publishes information on its non-fully consolidated or minority holdings, nor is there evidence that it discloses the country or countries of operation for each entity.

**Evidence**

**[14] Securities and Exchange Commission -Exhibit 21- Subsidiaries (Document)**  
**Accessed 02/06/2019**  
[https://www.sec.gov/Archives/edgar/data/773840/000093041313000907/c72130\\_ex21.htm](https://www.sec.gov/Archives/edgar/data/773840/000093041313000907/c72130_ex21.htm)  
**HONEYWELL INTERNATIONAL INC. SUBSIDIARIES OF THE REGISTRANT**

EX-21 5 c72130\_ex21.htm SUBSIDIARIES OF THE REGISTRANT

EXHIBIT 21

HONEYWELL INTERNATIONAL INC. SUBSIDIARIES OF THE REGISTRANT		Country or State of Incorporation	Percent Ownership
Name			
ADI-Gardiner Limited		United Kingdom	100%
AlliedSignal Aerospace Service Corporation		Delaware	100%
EMS Aviation, Inc.		New Jersey	100%
Grimes Aerospace Company		Delaware	100%
Hand Held Products, Inc		Delaware	100%
Honeywell (China) Co., Ltd.		China	100%
Honeywell Aerospace de México, S. de R.L. de C.V.		Mexico	100%
Honeywell ASCa Inc.		Canada	100%
Honeywell Automation India Limited		India	75%
Honeywell Automotive Parts Services (Shanghai) Co., Ltd.		China	100%
Honeywell Aerospace Avionics Malaysia Sdn Bhd.		Malaysia	100%
Honeywell Aerospace UK		United Kingdom	100%
Honeywell Co., Ltd.		Korea	100%
Honeywell Control Systems Ltd.		United Kingdom	100%
Honeywell Deutschland GmbH		Germany	100%
Honeywell Electronic Materials, Inc.		Washington	100%
Honeywell Europe NV		Belgium	100%
Honeywell Finance LP		Delaware	100%
Honeywell Holdings Pty. Ltd.		Australia	100%
Honeywell International Sàrl		Switzerland	100%
Honeywell International Services S.r.l.		Romania	100%
Honeywell Japan Inc.		Japan	100%
Honeywell Korea, Ltd.		Korea	100%
Honeywell Limited		Australia	100%
Honeywell Limited Honeywell Limitee		Canada	100%
Honeywell Luxembourg Holding S.a.r.l.		Luxembourg	100%
Honeywell Pte. Ltd.		Singapore	100%
Honeywell Specialty Chemicals Seelze GmbH		Germany	100%
Honeywell spol. sr.o.		Czech Republic	100%
HONEYWELL TECHNOLOGIES Sarl		Switzerland	100%
Honeywell Technology Solutions Inc.		Delaware	100%
Honeywell Technology Solutions Lab Pvt. Ltd.		India	100%
Honeywell UK Limited		United Kingdom	100%
Life Safety Distribution AG		Switzerland	100%
LXE LLC		Delaware	100%

**[15] Form 10-K Securities and Exchange Commission Submission 2019 (Document)**

Accessed 02/06/2019

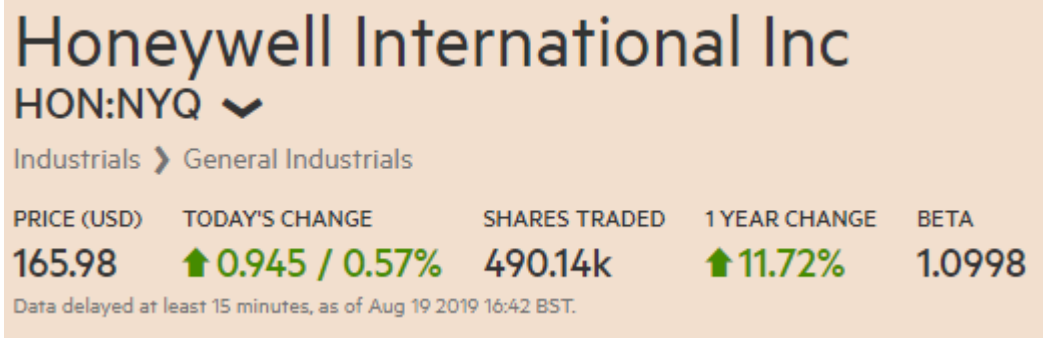
<http://investor.honeywell.com/Cache/396677830.PDF?O=PDF&T=&Y=&D=&FID=396677830&iid=4121346>

[p.19] Form 10K Honeywell International Inc.

**HONEYWELL INTERNATIONAL INC.**  
**SUBSIDIARIES OF THE REGISTRANT**

Name	Country or State of Incorporation	Percent Ownership
AlliedSignal Aerospace Service LLC	Delaware	100%
BW Technologies Partnership	Canada	100%
COM DEV Ltd.	Canada	100%
Elster American Meter Company, LLC	Delaware	100%
Elster GmbH	Germany	100%
Elster s.r.o.	Slovakia	100%
EMS Technologies Canada, Ltd.	Canada	100%
Grimes Aerospace Company	Delaware	100%
Hand Held Products, Inc.	Delaware	100%
Honeywell (China) Co., Ltd.	China	100%
Honeywell Aerospace Avionics Malaysia Sdn Bhd	Malaysia	100%
Honeywell Aerospace de México, S. de R.L. de C.V.	Mexico	100%
Honeywell Aerospace UK	United Kingdom	100%
Honeywell Automation India Limited	India	75%
Honeywell Automotive Parts Services (Shanghai) Co., Ltd.	China	100%
Honeywell Co., Ltd.	Korea	100%
Honeywell Control Systems Limited	United Kingdom	100%
Honeywell Deutschland Holding GmbH	Germany	100%
Honeywell Electronic Materials (Thailand) Co., Ltd	Thailand	100%
Honeywell Europe NV	Belgium	100%
Honeywell Finance LP	Delaware	100%
Honeywell Fluorine Products Europe B.V.	Netherlands	100%
Honeywell International (India) Private Limited	India	100%
Honeywell International Sàrl	Switzerland	100%
Honeywell International Sdn. Bhd.	Malaysia	100%



<b>Question</b>
<b>9.3 Does the company disclose its beneficial ownership and control structure?</b>
<b>Score</b>
<b>2</b>
<b>Comments</b>
<p>There is evidence that the company is publicly listed on the New York Stock Exchange (NYSE), and therefore it does not need to disclose further information on its beneficial ownership to receive a score of '2'. In addition, the company publicly discloses all shareholders that own over 5% stakes in the company in its Proxy Statement, indicating that no natural person owns 25% or more of shares or voting rights in the company.</p>
<b>Evidence</b>
<p><b>[21] Financial Times Market Data – Honeywell International Inc.</b>  <b>Accessed 19/08/2019</b>  <a href="https://markets.ft.com/data/equities/tearsheet/summary?s=HON:NYQ">https://markets.ft.com/data/equities/tearsheet/summary?s=HON:NYQ</a></p>  <p><b>[16] Proxy Statement 2018 (Document)</b>  <b>Accessed 02/06/2019</b>  <a href="http://investor.honeywell.com/Interactive/newlookandfeel/4121346/proxy-2018/images/Honeywell-Proxy2018.pdf">http://investor.honeywell.com/Interactive/newlookandfeel/4121346/proxy-2018/images/Honeywell-Proxy2018.pdf</a></p> <p>[p.27] Stock Ownership Information  The following table lists information about those holders known to Honeywell to be the beneficial owners of 5% or more of the outstanding shares of Common Stock as of December 31, 2017.</p> <p>The Vanguard Group 100 Vanguard Blvd., Malvern, PA 19355 51,357,383(1) 6.74%</p> <p>BlackRock, Inc. 55 East 52nd Street, New York, NY 10055 47,575,017(2) 6.3%</p>

<b>Question</b>																																															
<b>9.4 Does the company publish a percentage breakdown of its defence sales by customer?</b>																																															
<b>Score</b>																																															
<b>0</b>																																															
<b>Comments</b>																																															
<p>The company publishes some information on its defence sales, to indicate that its sales to the United States Department of Defense (DoD) accounted for US\$2,832 million in sales in 2018. The company publishes figures on its overall sales to indicate that the United States is its biggest customer across all divisions.</p> <p>However, the company receives a score of '0' because it does not publish further information on its major customers, nor does it distinguish between defence and commercial sales. It is therefore not clear whether the United States accounted for more than 50% of the company's defence sales in 2018.</p>																																															
<b>Evidence</b>																																															
<p><b>[8] Annual Report 2018</b>  <b>Accessed 31/05/2019</b>  <a href="http://investor.honeywell.com/Cache/1500118299.PDF?O=PDF&amp;T=&amp;Y=&amp;D=&amp;FID=1500118299&amp;iid=4121346">http://investor.honeywell.com/Cache/1500118299.PDF?O=PDF&amp;T=&amp;Y=&amp;D=&amp;FID=1500118299&amp;iid=4121346</a></p> <p>[p.1] Aerospace  Aerospace is a leading global supplier of products, software and services for aircrafts that it sells to original equipment manufacturers (OEM) and other customers in a variety of end markets including: air transport, regional, business and general aviation aircraft, airlines, aircraft operators and defense and space contractors. Aerospace products and services include auxiliary power units, propulsion engines, environmental control systems, integrated avionics, wireless connectivity services, electric power systems, engine controls, flight safety, communications, navigation hardware, data and software applications, radar and surveillance systems, aircraft lighting, management and technical services, advanced systems and instruments, satellite and space components, aircraft wheels and brakes, repair and overhaul services and thermal systems. Aerospace also provides spare parts, repair, overhaul and maintenance services (principally to aircraft operators) and connected solutions and data services for the aftermarket.</p> <p>[p.2] Aerospace Sales  Our Aerospace segment sales were 37%, 36% and 38% of our total sales in 2018, 2017 and 2016. Our sales to commercial aerospace OEMs were 7%, 6% and 6% of our total sales in 2018, 2017 and 2016. In addition, our sales to commercial aftermarket customers of aerospace products and services were 13%, 13% and 12% of our total sales in 2018, 2017 and 2016.</p> <p>[p.3] U.S. Government Sales  Sales to the U.S. Government (principally by Aerospace), acting through its various departments and agencies and through prime contractors, amounted to \$3,403 million, \$3,203 million and \$3,330 million in 2018, 2017 and 2016, which included sales to the U.S. Department of Defense, as a prime contractor and subcontractor, of \$2,832 million, \$2,546 million and \$2,647 million in 2018, 2017 and 2016. We do not expect our overall operating results to be significantly affected by any proposed changes in 2019 federal defense spending due principally to the varied mix of the government programs which impact us (OEMs' production, engineering development programs, aftermarket spares and repairs and overhaul programs), as well as our diversified commercial businesses.</p> <p>[p.103]  Note 23. Geographic Areas—Financial Data</p> <table border="1"> <thead> <tr> <th rowspan="3"></th> <th colspan="3">Net Sales<sup>(1)</sup></th> <th colspan="3">Long-lived Assets<sup>(2)</sup></th> </tr> <tr> <th colspan="3">Years Ended December 31,</th> <th colspan="3">December 31,</th> </tr> <tr> <th>2018</th> <th>2017</th> <th>2016</th> <th>2018</th> <th>2017</th> <th>2016</th> </tr> </thead> <tbody> <tr> <td>United States.....</td> <td>\$23,841</td> <td>\$22,722</td> <td>\$22,652</td> <td>\$3,601</td> <td>\$3,604</td> <td>\$3,744</td> </tr> <tr> <td>Europe.....</td> <td>10,066</td> <td>10,400</td> <td>9,966</td> <td>571</td> <td>927</td> <td>741</td> </tr> <tr> <td>Other International.....</td> <td>7,895</td> <td>7,412</td> <td>6,684</td> <td>1,124</td> <td>1,395</td> <td>1,308</td> </tr> <tr> <td></td> <td><u>\$41,802</u></td> <td><u>\$40,534</u></td> <td><u>\$39,302</u></td> <td><u>\$5,296</u></td> <td><u>\$5,926</u></td> <td><u>\$5,793</u></td> </tr> </tbody> </table> <p>(1) Sales between geographic areas approximate market and are not significant. Net sales are classified according to their country of origin. Included in United States net sales are export sales of \$5,293 million, \$4,974 million and \$5,290 million in 2018, 2017 and 2016.</p> <p>(2) Long-lived assets are comprised of property, plant and equipment - net.</p>		Net Sales <sup>(1)</sup>			Long-lived Assets <sup>(2)</sup>			Years Ended December 31,			December 31,			2018	2017	2016	2018	2017	2016	United States.....	\$23,841	\$22,722	\$22,652	\$3,601	\$3,604	\$3,744	Europe.....	10,066	10,400	9,966	571	927	741	Other International.....	7,895	7,412	6,684	1,124	1,395	1,308		<u>\$41,802</u>	<u>\$40,534</u>	<u>\$39,302</u>	<u>\$5,296</u>	<u>\$5,926</u>	<u>\$5,793</u>
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## 10. State-Owned Enterprises (SOEs)

<b>Question</b>
10.1 Does the SOE publish a breakdown of its shareholder voting rights?
<b>Score</b>
N/A
<b>Comments</b>
N/A
<b>Evidence</b>

<b>Question</b>
<b>10.2 Are the SOE's commercial and public policy objectives publicly available?</b>
<b>Score</b>
N/A
<b>Comments</b>
N/A
<b>Evidence</b>

<b>Question</b>
10.3 Is the SOE open and transparent about the composition of its board and its nomination and appointment process?
<b>Score</b>
N/A
<b>Comments</b>
N/A
<b>Evidence</b>

<b>Question</b>
10.4 Is the SOE's audit committee composed of a majority of independent directors?
<b>Score</b>
N/A
<b>Comments</b>
N/A
<b>Evidence</b>

<b>Question</b>
10.5 Does the SOE have a system in place to assure itself that asset transactions follow a transparent process to ensure they accord to market value?
<b>Score</b>
N/A
<b>Comments</b>
N/A
<b>Evidence</b>



**List of Evidence & Sources**

No.	Type <i>(Webpage or Document)</i>	Name	Link
01	Document	Code of Business Conduct	<a href="https://www.honeywell.com/content/dam/honeywell/files/code-of-conduct/Anticorruption%20Policy%202066%20pdf.pdf">https://www.honeywell.com/content/dam/honeywell/files/code-of-conduct/Anticorruption%20Policy%202066%20pdf.pdf</a>
02	Document	Anti-Corruption Policy - Highlights	<a href="https://www.honeywell.com/content/dam/honeywell/files/code-of-conduct/Anticorruption%20Policy%202066%20pdf.pdf">https://www.honeywell.com/content/dam/honeywell/files/code-of-conduct/Anticorruption%20Policy%202066%20pdf.pdf</a>
03 ...	Webpage	Integrity and Compliance	<a href="https://www.honeywell.com/en-us/company/integrity-and-compliance">https://www.honeywell.com/en-us/company/integrity-and-compliance</a>
04	Webpage	Governance Guidelines	<a href="http://investor.honeywell.com/IRW/CustomPage/4121346/Index?KeyGenPage=324757">http://investor.honeywell.com/IRW/CustomPage/4121346/Index?KeyGenPage=324757</a>
05	Document	Corporate Governance and Responsibility Committee Charter 2019	<a href="http://investor.honeywell.com/Cache/1001206974.PDF?O=PDF&amp;T=&amp;Y=&amp;D=&amp;FID=1001206974&amp;iid=4121346">http://investor.honeywell.com/Cache/1001206974.PDF?O=PDF&amp;T=&amp;Y=&amp;D=&amp;FID=1001206974&amp;iid=4121346</a>
06	Document	Audit Committee Charter 2018	<a href="http://investor.honeywell.com/Cache/1500113540.PDF?O=PDF&amp;T=&amp;Y=&amp;D=&amp;FID=1500113540&amp;iid=4121346">http://investor.honeywell.com/Cache/1500113540.PDF?O=PDF&amp;T=&amp;Y=&amp;D=&amp;FID=1500113540&amp;iid=4121346</a>
07	Document	Corporate Governance Guidelines	<a href="http://investor.honeywell.com/Cache/1001249998.PDF?O=PDF&amp;T=&amp;Y=&amp;D=&amp;FID=1001249998&amp;iid=4121346">http://investor.honeywell.com/Cache/1001249998.PDF?O=PDF&amp;T=&amp;Y=&amp;D=&amp;FID=1001249998&amp;iid=4121346</a>
08	Document	Annual Report 2018	<a href="http://investor.honeywell.com/Cache/1500118299.PDF?O=PDF&amp;T=&amp;Y=&amp;D=&amp;FID=1500118299&amp;iid=4121346">http://investor.honeywell.com/Cache/1500118299.PDF?O=PDF&amp;T=&amp;Y=&amp;D=&amp;FID=1500118299&amp;iid=4121346</a>
09	Document	Supplier Code of Conduct	<a href="https://www.honeywell.com/content/dam/honeywell/files/code-of-conduct/Supplier%20Code%20of%20Business%20Conduct%20pdf.pdf">https://www.honeywell.com/content/dam/honeywell/files/code-of-conduct/Supplier%20Code%20of%20Business%20Conduct%20pdf.pdf</a>
10	Webpage	Political Contributions	<a href="http://investor.honeywell.com/Political-Contributions/Index?KeyGenPage=324758">http://investor.honeywell.com/Political-Contributions/Index?KeyGenPage=324758</a>
11	Document	Corporate Governance Guidelines 2019	<a href="http://investor.honeywell.com/Cache/1001249998.PDF?O=PDF&amp;T=&amp;Y=&amp;D=&amp;FID=1001249998&amp;iid=4121346">http://investor.honeywell.com/Cache/1001249998.PDF?O=PDF&amp;T=&amp;Y=&amp;D=&amp;FID=1001249998&amp;iid=4121346</a>
12	Document	Global Government Relations Overview 2014	<a href="http://investor.honeywell.com/Cache/1001207089.PDF?O=PDF&amp;T=&amp;Y=&amp;D=&amp;FID=1001207089&amp;iid=4121346">http://investor.honeywell.com/Cache/1001207089.PDF?O=PDF&amp;T=&amp;Y=&amp;D=&amp;FID=1001207089&amp;iid=4121346</a>
13	Webpage	Gifts and Hospitality Submissions Page	<a href="https://honeywellcorpsf.secure.force.com/ghpolicy">https://honeywellcorpsf.secure.force.com/ghpolicy</a>
14	Document	Securities and Exchange Commission Submission - Subsidiaries 2019	<a href="https://www.sec.gov/Archives/edgar/data/773840/000093041313000907/c72130_ex21.htm">https://www.sec.gov/Archives/edgar/data/773840/000093041313000907/c72130_ex21.htm</a>
15	Document	Form 10-K Securities and Exchange Commission	<a href="http://investor.honeywell.com/Cache/396677830.PDF?O=PDF&amp;T=&amp;Y=&amp;D=&amp;FID=396677830&amp;iid=4121346">http://investor.honeywell.com/Cache/396677830.PDF?O=PDF&amp;T=&amp;Y=&amp;D=&amp;FID=396677830&amp;iid=4121346</a>

		Submission 2019	
16	Document	Proxy Statement 2018	<a href="http://investor.honeywell.com/Interactive/newlookandfeel/4121346/proxy-2018/images/Honeywell-Proxy2018.pdf">[http://investor.honeywell.com/Interactive/newlookandfeel/4121346/proxy-2018/images/Honeywell-Proxy2018.pdf]</a>
17	Document	Lobbying Contribution Report (2018)	<a href="http://investor.honeywell.com/Cache/1001253031.PDF?O=PDF&amp;T=&amp;Y=&amp;D=&amp;FID=1001253031&amp;iid=4121346">[http://investor.honeywell.com/Cache/1001253031.PDF?O=PDF&amp;T=&amp;Y=&amp;D=&amp;FID=1001253031&amp;iid=4121346]</a>
18	Document	Lobbying Disclosure Report	<a href="http://investor.honeywell.com/Cache/1001253030.PDF?O=PDF&amp;T=&amp;Y=&amp;D=&amp;FID=1001253030&amp;iid=4121346">[http://investor.honeywell.com/Cache/1001253030.PDF?O=PDF&amp;T=&amp;Y=&amp;D=&amp;FID=1001253030&amp;iid=4121346]</a>
19	Webpage	Gifts & Hospitality Policy	<a href="https://honeywellcorpsf.secure.force.com/ghpolicy">[https://honeywellcorpsf.secure.force.com/ghpolicy]</a>
20	Document	Honeywell Standard Purchase Order Terms and Conditions for Goods and Services	<a href="https://sensing.honeywell.com/sc-purchase-order-tc-ac-s-rev-aug-2009-v2-updated-feb-2014.pdf">https://sensing.honeywell.com/sc-purchase-order-tc-ac-s-rev-aug-2009-v2-updated-feb-2014.pdf</a>
21	Webpage	Financial Times Market Data – Honeywell International	<a href="https://markets.ft.com/data/equities/tearsheet/summary?s=HON:NYQ">https://markets.ft.com/data/equities/tearsheet/summary?s=HON:NYQ</a>
22	Webpage	United States FEC – Honeywell International Political Committee	<a href="https://docquery.fec.gov/cgi-bin/forms/C00096156/1376632/#DETAILED">https://docquery.fec.gov/cgi-bin/forms/C00096156/1376632/#DETAILED</a>