

ANTICORRUPTION POLICY 2066

Anticorruption policy 2066

Honeywell Aerospace

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

The authoritative version of this Policy, along with supplementary material, is available on the AeroConnect website and is applicable to all Honeywell Aerospace companies, entities and majority-owned affiliates.

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

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

1. Introduction

Honeywell Aerospace, along with its directors, officers, employees, contract staff and its subsidiaries and majority-owned affiliates, joint ventures (JVs), joint bidding arrangements (JBAs) and third parties representing Honeywell Aerospace must comply with various anticorruption laws, including the US Foreign Corrupt Practices Act (FCPA) and the UK Bribery Act (UKBA). These laws, Honeywell Aerospace's Anticorruption Policy 2066 (Policy) and Honeywell Aerospace's Code of Business Conduct prohibit bribery in any form.

The purpose of this document is to provide a high-level overview of the key provisions of the Policy to help others understand the expectations of the Policy.

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

2. Prohibited activities

Honeywell Aerospace prohibits the payment or receipt of all bribes and facilitation payments as follows:

- Offering, paying, promising to pay or authorizing payment of **anything of value** to any third party, including a customer or a **government official**, to improperly influence a **business outcome** or to expedite a routine government action
- **Accepting or requesting** any payment, promise of payment or anything of value to improperly influence a business outcome
- Engaging or working with a **third party** to do any activities described in the bullet points above.

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

3. Requirements for third parties

3.1 Contracting with sales intermediaries
Honeywell Aerospace defines sales intermediaries (SIs) as any third party authorized to solicit sales or promote Honeywell Aerospace products/services or any third party (excluding those set out in Section 3.2) who acts, or appears to act, on Honeywell Aerospace's behalf in front of an actual or prospective customer. SIs include distributors, agents, sales representatives, sales consultants, dealers, teaming agreements or consortia, integrators, or any person or entity subject to an arrangement that includes provisions for sales or marketing services.

All SIs MUST have:

- A legitimate business purpose for appointment
- Qualifications sufficient to fulfill the purpose of the appointment
- Reasonable compensation, rebates, and/or discount rates given the scope of services, market conditions and the territory where services will be provided, and must be reasonably commensurate with the value of the actual services provided
- Been assessed for the appropriate level of due diligence based upon their risk, proposed role and Honeywell Aerospace policy

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

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

- Due diligence
- Monitoring
- Recordkeeping
- Agreements

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

4. Offering or receiving business courtesies

Business courtesies include gifts, travel, accommodation, services, meals and entertainment, and recreation.

It is never acceptable to:

- Provide business courtesies to improperly influence or bribe anyone, whether a government official or a commercial business partner such as a customer, intermediary, or supplier
- Provide business courtesies that may create an appearance of impropriety, are hosted in an inappropriate venue, or could reasonably be interpreted or perceived as an attempt to gain an unfair business advantage
- Receive business courtesies that will unduly affect a Honeywell Aerospace employee's independent judgment
- Provide or receive business courtesies in exchange for any improper favor or benefit
- Offer or receive gifts of cash; or cash equivalents, such as gift cards, coupons, or vouchers
- Provide or direct business courtesies through a channel that would otherwise require Honeywell Aerospace approval, such as providing a business courtesy through a third party or paying through a passthrough vendor
- Offer, provide or receive any illegal item or service
- Extend business courtesies to individuals who are not directly related to the business (e.g., spouses, family members, etc.)

All business courtesies given to or received from third parties must comply with the following guidelines:

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

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

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

5. Entering into joint ventures

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

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

6. Recruitment of high-risk candidates

A high-risk candidate refers to current or former government officials, a referral or nominee of a government official, a candidate with ethical flags identified during the recruitment and background check process, a candidate who owns all or a portion of another entity that does business with Honeywell Aerospace, a candidate who is currently bound by a restrictive covenant agreement with their current or former employer, or a candidate who is related to or in a relationship with a current Honeywell Aerospace employee.

Before recruiting high-risk candidates, employees must contact HR and Integrity & Compliance for review and approval.

7. Charitable contributions and sponsorships

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

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

8. Anticorruption recordkeeping requirements

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

9. Managing incidents and reporting a concern

Employees have a responsibility to report violations or suspected violations of this policy through various reporting channels: the Law Department, his or her manager, a local Ethics Ambassador, the Integrity and Compliance Department, the Aero Integrity Helpline (888-829-8316), or email (AeroIntegrity@HoneywellAerospace.us).

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

Honeywell Aerospace

For more information
honeywellaerospace.com

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