

Policy Number: 2086	Policy title: Combating Human Trafficking	Effective Date: February 26, 2016
Policy Owner: Senior Vice President and General Counsel		Revision Date:

PURPOSE:

The purpose of this policy is to ensure Honeywell employees, agents and suppliers do not engage in human trafficking or human trafficking activities.

SCOPE AND APPLICABILITY:

LOCATION(S): All

BUSINESS UNIT(S): All

DISTINCTIONS: *All employees of Honeywell International Inc., its operating units, direct and indirect subsidiaries and joint ventures where Honeywell has a controlling interest.*

POLICY:

Honeywell employees, agents and suppliers shall not:

- (1) Engage in human trafficking;
- (2) Procure commercial sex acts;
- (3) Use forced labor;
- (4) Destroy, conceal, confiscate, or otherwise deny an employee access to that employee's identity or immigration documents, such as passports or drivers' licenses, regardless of issuing authority;
- (5) Make material misrepresentations during the recruitment of employees regarding: (1) the key terms and conditions of employment, including wages and fringe benefits, (2) the location of work, (3) living conditions, (4) housing and associated costs (if employer or agent provided or arranged), (5) any significant cost to be charged to the employee, and, (6) if applicable, the hazardous nature of the work;
- (6) Use recruiters who do not comply with local labor laws of the country in which the recruiting takes place;
- (7) Charge employees recruitment fees;
- (8) Fail to provide legally-required return transportation for employees, or pay for the cost of return transportation upon the end of employment;

This Policy is not intended to create contractual obligations. Employment with the Company is at will, in the U.S. and where otherwise permitted by law, which means that either the Company or the employee may terminate the employment relationship at any time and for any reason, without notice. The Company reserves the right to modify, amend, or terminate this Policy at any time. This Policy supersedes any prior policies of Honeywell or its predecessors, subsidiaries, and affiliates, whether written or oral, on the topics covered in this Policy.

This policy is the property of Honeywell International Inc. and is published on the Company's intranet at <http://policy.honeywell.com>. It is the reader's responsibility to review the intranet publication of this policy to ensure the most current version is being referenced before taking action based on this printed copy, which may be outdated.

- (ii) If the employee is a victim of trafficking in persons who is seeking victim services or legal redress in the country of employment, or is a witness in an enforcement action related to trafficking in persons, then Honeywell, its agents or suppliers will provide legally-required return transportation or pay the cost of return transportation in a way that does not obstruct victim services, legal redress, or witness activity; or
- (9) Provide or arrange employee housing that falls below host country housing and safety standards.

Supply Chain Audits

As part of its commitment to combat human trafficking, Honeywell conducts audits of its supply chain to ensure suppliers comply with this policy.

Violations

Honeywell will take appropriate action against employees, agents and suppliers who violate this policy. Honeywell employees who violate this policy may be subject to disciplinary action up to and including termination of employment.

DEFINITIONS:

The following definitions apply for purposes of this Policy:

Agent means any individual, including a director, an officer, an employee, or an independent contractor, authorized to act on behalf of Honeywell.

Coercion means--

- (1) Threats of serious harm to or physical restraint against any person;
- (2) Any scheme, plan, or pattern intended to cause a person to believe that failure to perform an act would result in serious harm to or physical restraint against any person;
or
- (3) The abuse or threatened abuse of the legal process.

Commercial sex act means any sex act on account of which anything of value is given to or received by any person.

Debt bondage means the status or condition of a debtor arising from a pledge by the debtor of his or her personal services or of those of a person under his or her control as a security for debt, if the value of those services as reasonably assessed is not applied toward the liquidation of the debt or the length and nature of those services are not respectively limited and defined.

Forced Labor means knowingly providing or obtaining the labor or services of a person:

This Policy is not intended to create contractual obligations. Employment with the Company is at will, in the U.S. and where otherwise permitted by law, which means that either the Company or the employee may terminate the employment relationship at any time and for any reason, without notice. The Company reserves the right to modify, amend, or terminate this Policy at any time. This Policy supersedes any prior policies of Honeywell or its predecessors, subsidiaries, and affiliates, whether written or oral, on the topics covered in this Policy.

This policy is the property of Honeywell International Inc. and is published on the Company's intranet at <http://policy.honeywell.com>. It is the reader's responsibility to review the intranet publication of this policy to ensure the most current version is being referenced before taking action based on this printed copy, which may be outdated.



- (1) By threats of serious harm to, or physical restraint against, that person or another person;
- (2) By means of any scheme, plan, or pattern intended to cause the person to believe that, if the person did not perform such labor or services, that person or another person would suffer serious harm or physical restraint; or
- (3) By means of the abuse or threatened abuse of law or the legal process.

Involuntary servitude includes a condition of servitude induced by means of:

- (1) Any scheme, plan, or pattern intended to cause a person to believe that, if the person did not enter into or continue in such conditions, that person or another person would suffer serious harm or physical restraint; or
- (2) The abuse or threatened abuse of the legal process.

Severe forms of trafficking in persons means:

- (1) Sex trafficking in which a commercial sex act is induced by force, fraud, or coercion, or in which the person induced to perform such act has not attained 18 years of age; or
- (2) The recruitment, harboring, transportation, provision, or obtaining of a person for labor or services, through the use of force, fraud, or coercion for the purpose of subjection to involuntary servitude, peonage, debt bondage, or slavery.

Sex trafficking means the recruitment, harboring, transportation, provision, or obtaining of a person for the purpose of a commercial sex act.

RESPONSIBILITY FOR THE POLICY:

The Corporate Vice President of Global Compliance, is responsible for interpretation of this policy.

RELATED POLICIES, INFORMATION AND RESOURCES:

Reporting Concerns and Seeking Guidance:

ACCESS, Honeywell's Integrity Helpline: 800-237-5982

Int'l Helpline Numbers: <https://in.honeywell.com/BusinessFunction/law/compliance/Pages/Helplines.aspx>

Or write: Honeywell International

Attn: ACCESS

P.O. Box 2245

Morristown, NJ 07962-2245

This Policy is not intended to create contractual obligations. Employment with the Company is at will, in the U.S. and where otherwise permitted by law, which means that either the Company or the employee may terminate the employment relationship at any time and for any reason, without notice. The Company reserves the right to modify, amend, or terminate this Policy at any time. This Policy supersedes any prior policies of Honeywell or its predecessors, subsidiaries, and affiliates, whether written or oral, on the topics covered in this Policy.

This policy is the property of Honeywell International Inc. and is published on the Company's intranet at <http://policy.honeywell.com>. It is the reader's responsibility to review the intranet publication of this policy to ensure the most current version is being referenced before taking action based on this printed copy, which may be outdated.



Or e-mail: access.integrity.helpline@honeywell.com

Or contact the Global Human Trafficking Hotline at 1-844-888-FREE or help@befree.org

This Policy is not intended to create contractual obligations. Employment with the Company is at will, in the U.S. and where otherwise permitted by law, which means that either the Company or the employee may terminate the employment relationship at any time and for any reason, without notice. The Company reserves the right to modify, amend, or terminate this Policy at any time. This Policy supersedes any prior policies of Honeywell or its predecessors, subsidiaries, and affiliates, whether written or oral, on the topics covered in this Policy.

This policy is the property of Honeywell International Inc. and is published on the Company's intranet at <http://policy.honeywell.com>. It is the reader's responsibility to review the intranet publication of this policy to ensure the most current version is being referenced before taking action based on this printed copy, which may be outdated.