



Policy Number: 2087	Policy title: Anti-Money Laundering Compliance	Effective Date: February 26, 2016
Policy Owner: Senior Vice President and General Counsel		Revision Date:

PURPOSE:

Honeywell complies with all applicable anti-money laundering laws, including the Bank Secrecy Act, as amended by the USA PATRIOT Act of 2001, and the anti-money laundering regulations administered by the U.S. Treasury Department’s Financial Crimes Enforcement Network (“FinCEN”) (collectively, “Anti-Money Laundering Laws”).

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:

Anti-Money Laundering Laws include specific provisions that apply to certain types of business activities conducted by Honeywell. In particular, FinCEN regulates certain purchase and sale transactions that involve certain precious metals.

To comply with these laws, Honeywell will only purchase and sell precious metals from approved brokers and dealers who have a demonstrated Anti-Money Laundering compliance program. These approved precious metals brokers and dealers are required to certify annually in writing to Honeywell that their program includes staff training and audits to test the program and otherwise meet the requirements of applicable Anti-Money Laundering laws.

Failure to comply with this Compliance Policy and the related Compliance Programs may result in disciplinary action including, but not limited to, termination of employment, suspension, demotion, reduction in pay and reprimand.

DEFINITIONS:

N/A

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.

RESPONSIBILITY FOR THE POLICY:

The Corporate Vice President, Procurement will work with the Treasury Function to compile an annual report of sales and purchases of precious metals and document that only approved precious metals brokers and dealers are buying and selling precious metals to Honeywell.

The Corporate Vice President, Direct Material Sourcing will report on the Anti-Money Laundering compliance program on an annual basis to the Vice President, Global Compliance and the VP & General Counsel, ISC, IT, FT and Global Operations.

RELATED INFORMATION AND RESOURCES:

U.S. Treasury Department's Financial Crimes Enforcement Network ("FinCEN") regulations -- 31 C.F.R. Part 103, Section 130.140c.

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>
 - Attn: ACCESS
 - P.O. Box 2245
 - Morristown, NJ 07962-2245
 - Or e-mail: access.integrity.helpline@honeywell.com

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