Honeywell Aerospace Code of Business Conduct

Honeywell Aerospace

Letter from our CEO

Dear Honeywell Aerospace employees:

At Honeywell Aerospace, our Foundational Principles – Safety, Integrity, and Compliance – form the behavioral framework for everything we do. Our Code of Business Conduct reflects our unwavering commitment to uphold these principles, guiding our actions and ensuring that we achieve success with the highest standards of integrity. As you carry out your responsibilities, the Code serves as a vital resource to help you make sound and principled decisions.

Honeywell Aerospace plays a critical role across commercial, defense, and space platforms worldwide. Sustaining and advancing our position requires that each of us consistently demonstrate the highest levels of integrity and act in the best interests of the Company and one another. Acting with integrity strengthens our credibility, preserves our reputation, and enables our continued growth and innovation. This responsibility is critical to your role as a Honeywell Aerospace employee.

As a Honeywell Aerospace employee, you must familiarize yourself with the Code of Business Conduct to understand our expectations and how they apply to your role. Should you have any questions, please consult the available resources and seek guidance.

It is equally important that you feel confident in speaking up. Honeywell Aerospace does not tolerate retaliation against anyone who raises questions or reports concerns in good faith. If you observe conduct that appears inconsistent with our Code, you are expected to report it promptly through one of the established reporting channels.

Thank you for your continued commitment to upholding the highest standards of integrity and ethics at Honeywell Aerospace.

Jim Currier
President & Chief Executive Officer

Overview

The Honeywell Aerospace Code of Business Conduct establishes the company's core expectations for ethical, safe, and compliant behavior across all global operations. Anchored in Honeywell Aerospace's Foundational Principles—Safety, Integrity, and Compliance—the Code guides employees, leaders, and business partners in making sound, principled decisions that protect the company, its people, and its customers.

All employees, officers, and directors are required to understand and follow the Code and applicable company policies. Honeywell Aerospace emphasizes acting with integrity, speaking up without fear of retaliation, and applying sound judgment in situations involving legal, ethical, or safety considerations. Employees are expected to seek guidance whenever uncertain, and report potential misconduct through multiple available reporting channels, including managers, HR, the Law Department, Global Security, Ethics Ambassadors, or the Aero Integrity Helpline. Retaliation against good-faith reports is strictly prohibited.

The Code outlines professional conduct expectations in four core areas:

1. How We Treat Each Other
Employees must foster an inclusive, respectful, and harassment-free workplace. Honeywell Aerospace prohibits unlawful discrimination, supports diversity and global mindset, and requires safeguarding personal data. Safety is a top priority, and there is zero tolerance for violence, being under the influence of substances, or any unsafe behavior.

2. How We Act in the Best Interests of the Company
Employees must avoid conflicts of interest; protect confidential information, intellectual property, and physical assets; ensure lawful and responsible use of technology and AI tools; and uphold cybersecurity vigilance. The Code prohibits improper personal benefits, misuse of company resources, insider trading, and unauthorized disclosure of sensitive information.

3. How We Treat Our Customers and Suppliers
Honeywell Aerospace commits to delivering safe, high-quality products, competing honestly, and complying with anti-corruption and competition laws. The Code prohibits commercial bribery, improper payments to government officials, inaccurate billing, falsified records, or misuse of customer confidential data. Employees must maintain fairness and integrity in all supplier relationships and safeguard supplier information.

4. How We Treat Shareholders, Communities, and the World
Honeywell Aerospace requires accurate books and financial disclosures, cooperation with audits, compliance with anti-money-laundering laws, and responsible records management. The company emphasizes environmental protection, respect for human rights, responsible political activity, lawful global trade practices, and adherence to export, import, sanctions, and anti-boycott regulations.

Across all topics, the Code reinforces the expectation that employees act ethically, follow the law, avoid improper conduct, and uphold Honeywell Aerospace's reputation for integrity and excellence. It empowers employees to speak up, seek advice, and make decisions that demonstrate Honeywell Aerospace's commitment to doing business the right way, every day and everywhere the company operates.

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Honeywell Aerospace's foundational principles

Honeywell Aerospace expects all employees to comply with the Code of Business Conduct and to abide by our three Foundational Principles: Safety, Integrity, and Compliance. A commitment to these Foundational Principles is a baseline expectation of working at Honeywell Aerospace.

While we don't expect employees to always exhibit perfection in all five behaviors, no one can ever fail to demonstrate Safety, Integrity, and Compliance in the work that you perform each and every day. Our unfailing commitment to our Foundational Principles is a competitive advantage for the Company, and we should all take pride in our strong commitment to achieving business results the right way.

Act with Honeywell Aerospace's five behaviors

In combination with achieving results, Honeywell Aerospace's new behaviors will further clarify what is needed to succeed in the marketplace today and what is important in our culture.

Obsess over customer outcomes
We start out with what our customers aim to achieve – their mission comes first. We listen carefully to their challenges, anticipate their needs, expand their ideas of what's possible, and partner for the long term. For us, business isn't transactional; it's a shared commitment to common goals.

Drive ongoing transformation
We gather the necessary facts, align on objectives, and commit to action. We make decisions at the right levels and move fast with thoughtful intention. Speed matters when our customers count on us most, so we set our pace to match their priorities, never compromising on quality.

Innovate with purpose
We solve at the system level, integrating technologies and optimizing processes to be more efficient, reliable, and safe. We design and test with the end-user in mind to ensure our solutions are as practical as they are profound, continuously improving on our legacy of relentless innovation to advance what's next.

Own the mission end-to-end
We focus on holistic results, not just individual tasks. We carry issues through to their conclusion, hold one another to high standards, speak up when something isn't working, and work together to make it right. Accountability means delivering what we promised, when we promised, until the entire job is done.

Succeed as one team
We operate as a cohesive unit – respecting, supporting, and developing each other so we can all reach our collective potential. We readily share information, coordinate across borders, and invest in attracting and growing our talent. Because integrated solutions only happen when we work together as one.

Introduction to our code

The Honeywell Aerospace Code of Business Conduct (our "Code") is designed to provide guidance to each of us regarding Honeywell Aerospace's standards of integrity and compliance in all our business dealings. Our Code is an integral element of our Foundational Principles and the Honeywell Aerospace Behaviors. It describes the basic rules of conduct that we, as Honeywell Aerospace, are expected to follow. In addition, it provides helpful resources in the event we have a question or concern about proper conduct.

Our Code defines what Honeywell Aerospace expects from each of us and how we treat:

- One another
- Our Company
- Our customers
- Our suppliers
- Our shareholders
- Our communities

What Honeywell Aerospace expects from each of us

Our Company's growth starts with each of us – we are key to our Company's character and central to its leadership and success.

Who must follow our code

Our Code applies to all employees, officers, and directors of Honeywell Aerospace. 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 Aerospace, 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 Aerospace policies, and applicable laws and regulations.

Our shared obligations

We all have a personal obligation to know and follow the Code, as well as other Company policies, procedures, and guidelines that apply to our job responsibilities at Honeywell Aerospace. Many of these are cited in the appropriate section of the Code. Others can be found in the Honeywell Aerospace Policy Portal. We must never ignore or seek to circumvent the Code for any reason. If you need help understanding our Code or a specific policy, procedure, or guideline, or how they apply to your scope of responsibilities, seek guidance from any resource listed in "Reporting Channels."

Additional obligations for managers and supervisors

Managers and supervisors have a special responsibility to uphold our Code and Foundational Principles. Managers must lead by example, demonstrating Safety, Integrity, and Compliance in all actions and decisions.

Managers are accountable for the environment they create and the behavior of their teams and are responsible for the actions of their direct reports. This includes ensuring employees understand expectations, are properly trained, and feel comfortable raising concerns without fear of retaliation. Managers must promptly address and escalate issues and must never ignore or tolerate misconduct.

By reinforcing accountability, supporting open communication, and ensuring results are achieved the right way, managers play a critical role in protecting our culture, reputation, and long-term success.

Complying with the law

Although our Code addresses some of the common challenges that multinational companies like Honeywell Aerospace face, it cannot address every situation that may arise in our workplace. When in doubt as to whether an activity is proper, you should review the resources referred to in "Reporting Channels."

Laws and regulations are complex and subject to change, and they often vary from country to country. Company policies may also be subject to change and may vary greatly depending on the country in which we are operating. For these reasons, we must take care to familiarize ourselves with the policies, procedures, and laws that apply to our particular job functions and to the locations in which we operate. If a local law conflicts with our Code, comply with local law. If a local custom or practice conflicts with our Code, comply with the Code.

Your business or region may have policies and practices that require more from you than required by this Code. The same may be true of local law. In all such instances, you must follow the stricter policy, practice, or law. If you have any doubts about the lawfulness or appropriateness of a proposed action, seek advice by following the steps set out in "Asking for Advice."

This Code is intended to be consistent with and refer to certain key Corporate policies, which are included in the Honeywell Aerospace Policy Portal. The Honeywell Aerospace Policy Portal may provide greater detail than is provided by this Code. In some instances, the Policy Manual may provide additional policies not covered by this Code. The Honeywell Aerospace Policy Portal is located on AeroConnect.

It is important to note that our employment rights are governed by the laws of the countries in which we do business, as well as the rules in place in the locations where we work. Our Code attempts to clarify Honeywell Aerospace's rights and expectations as an employer but does not create any contractual employment rights for employees.

In the United States and other countries, employment by Honeywell Aerospace is considered "at-will." This means that you have the right to terminate your employment at any time and for any reason, and Honeywell Aerospace may exercise the same right, consistent with applicable laws. If local laws differ from the provisions of this Code, follow the laws of the country in which you work.

Asking for advice

While working on behalf of Honeywell Aerospace, 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 when you need additional help to make the right choice. In these instances, ask yourself:

- Is it legal?
- Is this decision or action consistent with Honeywell Aerospace's Foundational Principles, policies, and the Code?
- Would I be willing to be held accountable for this decision or action?
- Would this decision or action reflect positively if reported to others within Honeywell Aerospace or in the media?

If the answer is "no" to any of these questions, then "don't do it" or report the concern if you see someone else doing it. If you are not sure, stop and consider the impact of your decisions and actions and seek guidance.

While Honeywell Aerospace works hard to identify, incentivize, and reward those who do the right thing, it also takes swift and decisive action–including notifying government authorities and imposing serious employment consequences, up to and including termination–against those who fail to follow our Foundational Principles, violate the Code, or engage in other unacceptable conduct.

You may seek guidance by contacting any of the resources listed in "Reporting Channels."

Reporting channels

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.

You have several resources available to you to report these concerns. You can either:

Talk to:

- Your manager or supervisor
- Any Human Resources representative
- Any Ethics Ambassador
- A member of the Law Department or Global Security
- A member of the Integrity and Compliance Department

Dial: 888-829-8316 from the United States, and if outside the United States, refer to the Aero Integrity Helpline Portal for a listing of additional country-specific helpline numbers.

Online: By submitting an online report available at: https://honeywellaerospace.speakfullynow.com

Email to: aerointegrity@honeywellaerospace.us

Write to:

Honeywell Aerospace
Attention: Aero Integrity Helpline
1944 E. Sky Harbor Circle
Phoenix, AZ 85034

The Aero Integrity Helpline is a 24-hour service. It is answered by an independent third-party provider that accommodates all the languages that Honeywell Aerospace employees speak.

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.

How reports are handled

Honeywell Aerospace 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.

- Once a report is submitted, Honeywell Aerospace:
- Acknowledges the report and, if warranted, opens a case and assigns an impartial investigator.
- Obtains facts through interviews and document review.
- Reaches conclusions whenever possible based on facts gathered.
- Issues necessary corrective actions based on a standard framework.
- Provides feedback on the report to the person reporting the issue (if that person is known) in a reasonable timeframe.

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 to be fully truthful when providing evidence or testimony in such an investigation may be grounds for disciplinary action, up to and including termination (subject to applicable local laws). It should be emphasized that appropriate corrective or disciplinary action for Code violations will be taken whenever necessary.

Honeywell Aerospace will not tolerate retaliation

Honeywell Aerospace is committed to fostering a work environment where employees feel comfortable raising questions and concerns. The Company does not tolerate retaliation against any individual who, in good faith, reports actual or suspected misconduct or participates in an investigation.

A report made in "good faith" is one based on an honest belief that the information provided is accurate and complete to the best of the individual's knowledge, even if the concern is not ultimately substantiated.

Retaliation is any adverse action taken because an individual raised a concern or assisted in an investigation. Retaliation may be direct or indirect and can take many forms, including, but not limited to:

- Termination, demotion, or other disciplinary action
- Reduction in compensation, hours, or job responsibilities
- Negative or unwarranted performance evaluations
- Denial of training, promotion, or development opportunities
- Exclusion from meetings, projects, or normal work activities, or reassignment to less favorable duties or schedules
- Harassment, intimidation, or other inappropriate conduct

Conduct that discourages, penalizes, or interferes with an individual's willingness to speak up or cooperate with an investigation is prohibited.

Individuals who engage in retaliation are subject to disciplinary action, which may include coaching, verbal or written warnings, suspension, or other corrective action, up to and including termination of employment.

If you believe retaliation has occurred, report your concern promptly using one of the methods outlined in "Reporting Channels."

Honeywell Aerospace: How we treat each other

Promoting a positive work environment based on mutual respect and a commitment to inclusivity and safety is the key to maintaining the best possible talent and to providing growth opportunities for our stakeholders.

Honeywell Aerospace is committed to maintaining an inclusive, safe, and respectful working environment for all employees. Honeywell Aerospace has zero tolerance for harassment or unlawful discrimination in our workplace. Such conduct is strictly prohibited. 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.

Respecting each other and promoting a positive workplace

At Honeywell Aerospace, we are committed to treating people with respect. Employees should be able to work and learn in a safe and stimulating atmosphere where they feel valued and accepted. Together, we aim to provide an inclusive work environment that fosters respect for all coworkers, clients, and business partners and is free from harassment or personal behavior not conducive to a productive work climate.

Honeywell Aerospace will not tolerate intimidating, hostile, abusive, or offensive behaviors in our workplace. If you know or suspect that unlawful or inappropriate harassment has occurred, you should report the situation immediately via one of the reporting channels described in “Reporting Channels.”

For more information, see our Workplace Harassment Policy.

Embracing inclusion and global mindset in the workplace

Our employees around the globe bring a wide variety of experiences, backgrounds, talents, and perspectives that are fundamental enablers for our business. We strive for an inclusive environment where all employees feel valued and respected and can innovate to solve the world’s most challenging problems.

We are committed to maintaining an inclusive, safe, and respectful working environment for all employees, regardless of gender, race, color, ethnic background, age, religious belief, national origin, sexual orientation, gender identity, disability, marital status, veteran status, citizenship or impending citizenship, or any other characteristic protected by law. Honeywell Aerospace has zero tolerance for unlawful discrimination or conduct that otherwise singles out an employee or group of employees based on the protected categories listed above.

For more information see our Equal Employment Opportunity and Applicants and Employees with Disabilities policies.

Protecting personal data

Honeywell Aerospace promotes a work environment and operates our businesses in a manner that fosters confidence and trust. To accomplish this goal, we must properly manage the personal data provided to us by our colleagues, customers, suppliers, and others. "Personal data" is any information relating directly or indirectly to an identified or identifiable natural person. Examples of personal data include: name, home address, personal email address and phone number, business contact details, HR records, employee identification number, geo-location data, login credentials, and online identifiers such as an IP address.

We should only collect, access, use, or disclose personal data for appropriate business purposes. In addition, we should use the minimum amount of personal data needed to accomplish a task and avoid processing personal data if the objective of the processing can be achieved without processing personal data. We must not share personal data with anyone, either inside or outside our Company, who does not have a business need to know it. Further, we must delete personal data when it is no longer needed and in accordance with the Records Management Policy, and we must take steps to properly secure personal data at all times.

Company policies, practices, and training programs are designed to ensure that only authorized personnel access personal data. If you believe that personal data has been subjected to unauthorized disclosure, use, access, destruction, or acquisition, you must contact the Law Department's Data Privacy Function immediately. Failure to do so could subject our Company to fines and/or regulatory action.

When processing personal data, Honeywell Aerospace complies with applicable law as well as Company policies. For more information, see our Data Privacy Policy, Records Management Policy, Acceptable Use of Information Policy and Information Classification & Handling Policy.

What if...?

I need to work with a spreadsheet that has Honeywell Aerospace employees' government identification numbers. Can I send it to my personal email?

No. Government identification numbers and other national identifiers constitute "sensitive identification data," which is highly confidential, must always be encrypted, and may only be used when absolutely necessary, such as for tax purposes. Sensitive data must not be removed from Honeywell Aerospace systems without the prior written approval of the Law Department.

I received a request to share personal data for insurance purposes. Should I comply?

You should verify that the requestor has an appropriate data processing agreement in place with Honeywell Aerospace. In addition, you should open a ticket in Red or Red Gov, for appropriate handling of employee personal data externally.

Substance abuse

Substance abuse limits our ability to do our work safely, which puts us all in jeopardy. For this reason, we may never work on behalf of Honeywell Aerospace while under the influence of alcohol, illegal drugs, or misused prescription or over-the-counter medications. This applies whenever you are performing services for, or on behalf of, Honeywell Aerospace, even if the use occurs after hours or off Company premises. In addition, we may never use, possess, transfer, or sell illegal drugs, or alcohol, or misuse prescription drugs or over-the-counter medications, during working hours or while on Company premises. Our Company makes an exception to this rule when alcohol is transferred in a sealed container for authorized gift purposes or is used in moderation at an authorized Company event.

For more information, see our Alcohol and Drugs in the Workplace Policy.

A violence-free workplace

We work to prevent any acts or threats of violence in our workplace as part of our commitment to health and safety. Individuals who engage in violence or threats of violence may be subject to disciplinary action, up to and including termination of employment, as well as possible criminal prosecution. You should report all threats and acts of violence to your supervisor, local Human Resources representative, or Honeywell Aerospace Global Security immediately. If you feel that someone is in immediate danger, you should also contact the local authorities.

For more information, see our Violence Prevention Policy.

Providing a healthy and safe workplace

By integrating health, safety, and environmental considerations into all aspects of our business, we protect our people and the environment, achieve sustainable growth and accelerated productivity, drive compliance with all applicable regulations, and develop the technologies that expand the sustainable capacity of our world. Our Health, Safety, and Environment, Product Stewardship, and Sustainability (HSEPS) Management System reflects our values and helps us meet our business objectives. Adherence to our HSEPS management system helps ensure that our employees, communities, and environment remain safe. Knowingly failing to comply with HSEPS requirements, including the requirement to report information regarding HSEPS incidents, is a violation of our Code. If we believe that conditions are in any way unsafe, we must stop work immediately. Refer to the section on "Protecting the Environment" for more information.

We must make sure that our facilities are secure at all times. This means we allow only authorized individuals access to our worksites. If you believe that someone is attempting to improperly access a Honeywell Aerospace facility, contact Honeywell Aerospace Global Security.

What if...?

During a service visit, I was asked by the customer to hurry and skip the step of performing the required pre-job hazard assessment. Is skipping a step to please the customer appropriate?

No, skipping a required step is not acceptable. Our HSEPS Management System establishes programs such as conducting job hazard assessments to identify and manage potential risks. If the customer insists, stop work and escalate to your supervisor to find a solution with the customer.

I am the project manager for production startup for a new product. During a project meeting, a vendor partner mentioned that the project could be expedited because the equipment is compliant with laws and a safety review is not needed. To make up time, should I authorize the purchase of the new equipment without the required HSE review?

No, bypassing the review could result in violation of safety regulations and a potential safety risk to others. Always engage an HSE representative to conduct a review of proposed equipment to ensure it meets all applicable company and legal requirements.

Honeywell Aerospace: How we act in the best interest of our company

We should conduct Honeywell Aerospace business free from outside influences or personal biases and make business decisions based on the best interests of Honeywell Aerospace.

Avoiding conflicts of interest

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. If you have a potential or actual conflict of interest, you must disclose it immediately by submitting it through the Conflicts of Interest Submission Portal or in writing to your supervisor. 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.

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 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 if what is accepted is not in violation of any law, cannot be viewed as a bribe, and would not embarrass you or Honeywell Aerospace 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 Aerospace 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 Aerospace, 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.

What if...?

A vendor invited me to lunch, and I accepted. Is it acceptable?

Occasional meals and nominal gifts are ordinarily acceptable if they don't raise a question about your objectivity. You should request compliance approval using the employee Travel and Expense application prior to receiving or giving business courtesies.

I am 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 certain government officials. I think it would be disrespectful, so I want to proceed with giving all attendees the same gifts. What should I do?

You should contact the Integrity and Compliance Department for guidance and approval before proceeding with the event, which should follow Honeywell Aerospace policy and local law restrictions.

Financial interests

As Honeywell Aerospace 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 Aerospace does business is permissible. However, such situations should be reviewed by the Law Department or the Integrity and Compliance Department 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 Aerospace, unless you receive approval from the Law Department. Always ensure you are able to make business decisions with Honeywell Aerospace's best interests in mind.

What if...?

I have been invited to join the board of a local nonprofit organization that recycles and refurbishes used electronics for disadvantaged youth. There is no overlap with Honeywell Aerospace's business, and my board duties occur outside Honeywell Aerospace hours. Can I join?

Yes. Although there is no direct conflict, you must disclose this to your manager or HR, or through the Conflicts of Interests Submission Portal and get approval before joining. You should ensure board activities do not interfere with Honeywell Aerospace duties. See the Secondary Employment and Outside Organization Service Policy.

Secondary 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. Nevertheless, employees are expected to treat their work for Honeywell Aerospace as their primary employment. We must never use Honeywell Aerospace tangible and intangible property, including documents, Information Technology assets, facilities, and intellectual property to conduct non-Honeywell Aerospace business. All secondary employment should be disclosed by communicating with your supervisor or by submitting it through the Conflict of Interests Submission Portal.

For more information, see Secondary Employment and Outside Organization Service Policy.

What if...?

I coach football at a community college. I want my team to make the finals, but I am also under a tight work deadline. Can I ask my direct reports to help me with the upcoming game's logistics?

No. Using Honeywell Aerospace resources for an outside coaching job is inappropriate and creates a conflict of interest. You should inform your supervisor about your coaching activities and ensure they do not interfere with your Honeywell Aerospace duties.

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 Aerospace. This rule applies even in indirect situations where you, your family member, or a close friend owns or works on behalf of another company with which Honeywell Aerospace does, or is considering doing, business.

What if...?

I want to order parts from my cousin's company for use in a Honeywell Aerospace product. Can I do this?

You should disclose your relationship to your supervisor and recuse yourself from any decision. If your cousin's company meets Honeywell Aerospace's standards, it can compete fairly for the order.

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, influence the compensation or career progression of, 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.

What if...?

I need to hire someone quickly and have asked my job-seeking cousin to apply. Is it ok?

This could appear as a conflict of interest. You should disclose your relationship and not be involved in the hiring. Standard staffing and management processes must 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 Aerospace. 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 Aerospace employee assists a competitor to Honeywell Aerospace'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.

What if...?

I started my own business and need to understand pricing details of potential suppliers to my business. Would it be wrong to pull the pricing data of some of these potential suppliers from the Honeywell Aerospace system?

Yes. It creates a conflict of interest. You cannot use Honeywell Aerospace information or perform work for a personal business on Honeywell Aerospace premises or during your working hours. In addition, you should not use Honeywell Aerospace's suppliers' confidential information for a non-authorized purpose.

Corporate opportunities

In order to make objective business decisions on behalf of Honeywell Aerospace, 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 Aerospace 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.

Safeguarding company property and information

Protecting Honeywell Aerospace's physical, informational, and digital assets is essential to maintaining our operational strength and fulfilling our commitments to customers, colleagues, and stakeholders. Every employee plays a critical role in ensuring that Company property is used responsibly, secured properly, and handled in accordance with our policies and legal obligations.

Honeywell Aerospace is committed to maintaining a secure environment where our physical resources, confidential information, intellectual property, and technology systems are safeguarded at all times. We must prevent theft, misuse, loss, and unauthorized access; use only approved tools and systems; follow all cybersecurity, confidentiality, and data-handling requirements; and immediately report suspected security incidents or system compromises. This responsibility extends to how we work in public spaces, how we use technology, and how we exercise sound judgment when handling Company information.

Honeywell Aerospace's physical property

Theft, damage, carelessness, and waste have a direct impact on our Company's success. We must therefore commit to protecting our Company's physical assets from theft, damage, loss, or misuse. This includes our facilities, vehicles, business equipment, merchandise, and supplies. If you suspect any form of fraud or theft, you should report it to your manager or supervisor immediately.

Authorized occasional personal use of certain Company equipment, such as telephones or internet, is sometimes appropriate. However, we must ensure our personal use is limited, does not interfere with our ability to do our work for Honeywell Aerospace, and does not violate Company policy or law. Never use Honeywell Aerospace property for personal gain or that of another person or organization. You must also return any Company property you possess at the end of your employment.

Honeywell Aerospace's confidential information

We are each entrusted with our Company's confidential information. We must protect this sensitive information at all times. This generally includes any nonpublic information that might be of use to competitors or others, or which may be harmful to the Company if disclosed. Examples include business or marketing plans, supplier information, product design, manufacturing processes, existing and future merchandising information, and employee information.

We must never allow unauthorized personnel to access Honeywell Aerospace's confidential information. We must take care not to lose, misplace, or leave confidential information (or technologies containing such information, including computers, laptops, cell phones, mobile devices, and software) unattended. Moreover, if we lose Company equipment or an item containing confidential Honeywell Aerospace information (for example, a Honeywell Aerospace laptop, phone, or the like), we should report the loss immediately to Honeywell Aerospace Global Security.

In addition, we may not discuss Honeywell Aerospace's confidential information where it might be overheard or seen by those who do not have a need to know it. This includes public places such as airport terminals, trains, and restaurants. It also includes open areas at Honeywell Aerospace such as Company restrooms and break rooms. We may only grant access to confidential information to coworkers who have a legitimate business need to know it. We must never use confidential information about the Company for personal gain or disclose it to others for their gain. We must never email Honeywell Aerospace confidential information to a personal email account, and we must return any Honeywell Aerospace's confidential information in our possession before our last day of employment.

For more information, see our Data Privacy Policy and Information Classification and Handling Policy.

What if...?

My laptop was stolen when someone broke into my vehicle. What should I do?

You should file a police report, notify your manager, and file a Lost/Stolen Laptop form or contact IT Service Desk to obtain assistance to file the form. Employees should not leave devices in an unattended vehicle even if locked.

I suspect my system has been compromised after clicking a link in an email that appeared to be legitimate. What should I do?

You should use the "Report Message" button on your Outlook toolbar to report the email, or if not available, forward the email to security@honeywellaerospace.com.

Insider threat program

We are committed to protecting our people, information, and systems from internal and external threats through our Threat Operations & Insider Threat Program. Our global team of cyber incident responders, threat intelligence professionals, and program specialists continuously monitors our environment—across email, networks, and other digital systems—for suspicious activity, 24 hours a day, seven days a week. We investigate potential threats promptly, working with internal and external partners to respond effectively while minimizing disruption to business operations. When potential risks are identified, we assess their nature and scope, determine who or what may be affected, and take appropriate action to contain and prevent future incidents. Through vigilance, collaboration, and expertise, we safeguard Honeywell Aerospace's assets, users, and reputation.

Honeywell Aerospace's intellectual property

We work diligently to protect our Company's intellectual property. "Intellectual property" includes any of our Company's patents, trademarks, copyrights, or other intangible assets such as, ideas, inventions, processes, or designs created on Company time, at Company expense, using Company resources, or within the scope of our job duties. We will identify any new inventions we make and will direct them to the Law Department for patent, copyright, or trade secret protection. You should report any suspected misuse of our Company's intellectual property to the Law Department.

Respecting the intellectual property rights of others

We respect the intellectual property rights of others. This means we must never knowingly infringe on the copyrights, trademarks, or patents of others. We may not download unlicensed software onto Company computers or duplicate, publish, or distribute copyrighted materials. We will not download songs, photographs, and videos without consent from the rightful owner. In addition, we will not disclose or use the confidential information of former employers.

See our Licensing of Honeywell Aerospace Intellectual Property Policy for more details.

What if...?

I often work and take business calls in public areas. Can I discuss Honeywell Aerospace business this way?

You can take calls in public places, but you should not discuss any proprietary or confidential information.

I want to use my device to review and work on business-related documents while using public transportation. Is this a problem?

It may be. When using Company devices in public places for Company business, you must always protect your screen from onlookers. You must also lock and secure your workstation when not in use. Be sure to secure any connections to public Wi-Fi by connecting your device to your Virtual Private Network (VPN).

Using information technology resources

Honeywell Aerospace provides many of us access to various electronic communications systems to use in our daily work. This includes computer and phone systems, laptops, cell phones, mobile devices, and software. We have a duty to safeguard these systems and the technologies provided to us at all times. This means we must each do our part to prevent damage, harm, loss, and unauthorized access to these resources. Be sure to follow all security measures and internal controls in place for the resources you use. Always lock and secure your workstation, laptop, or mobile device if left unattended in a public place or at a Honeywell Aerospace location even if for a short period of time. Safeguard your login credentials to all Honeywell Aerospace devices and accounts. Never share your credentials with any unauthorized agent. Where required to share your password to an authorized agent for technical support purposes, change your password immediately once your technical issue has been resolved.

Remember that electronic messages (such as emails, instant messages, and text messages) are permanent records of your communications. These communications can be altered and forwarded without your permission. For this reason, take particular care when drafting any electronic messages or letters on Company letterhead or when using Honeywell Aerospace resources.

Exercise good judgment and integrity when using these systems and technologies. Only use approved systems, devices, storage media, and/or services to process, store, or transmit Honeywell Aerospace information. Do not install unapproved software on Honeywell Aerospace computers, network servers, or other Honeywell Aerospace Information resources without receiving advance authorization from Honeywell Aerospace IT. Do not agree to any third-party agreements such as cloud or clickthrough services agreements on behalf of Honeywell Aerospace. Do not download or send inappropriate, sexually explicit, illegal, or offensive material via these resources. You also may not use these resources to conduct outside work. To the extent permitted by local law, you should not have an expectation of privacy when using Company resources, as Honeywell Aerospace may monitor your personal use of Company resources. However, it is important to note that our Company will not interfere in our personal lives unless our conduct is prohibited by law, impairs our work performance, or adversely affects our work environment or Honeywell Aerospace's reputation.

What if...?

I am working in a coffee shop using a Honeywell Aerospace device. After finishing work, I connect to a personal Wi-Fi to download my favorite TV show. Is this appropriate?

Limited non-business use, which is not an abuse of Company time and/or resources and follows all Honeywell Aerospace policies can be permitted at the manager's discretion. Employees should always act in an ethical and lawful manner and always obtain manager permission to use a Honeywell Aerospace asset for non-business use. To avoid cybersecurity threats, never use open public Wi-Fi networks because these are not protected. Where such connections are the only option, VPN must be used.

I need to share sensitive information with a supplier to complete a project, and the supplier suggested I upload the files to a third party's cloud system. What should I do?

You should use Honeywell Aerospace IT approved transfer methods first. If another method is needed, work with Honeywell Aerospace IT for approval. Note that export-controlled and restricted data can never be moved into any cloud service. Contact your Export Compliance Officer for guidance.

For more information, see our Acceptable Use of Information Policy.

Responsible use of AI

Honeywell Aerospace is committed to the responsible use of AI and Generative AI, and we incorporate principles of accountability, safety, reliability, fairness, privacy, protection of intellectual property, transparency, and sustainability to inform decision making across all AI uses at Honeywell Aerospace. While the Company encourages innovation through the use of AI tools, you must obtain appropriate approvals for new AI or Gen AI use cases when required and only use authorized AI tools that are provided to you by Honeywell Aerospace for work purposes.

For more information, please refer to the Honeywell Aerospace Responsible AI Governance Framework and the Honeywell Aerospace Responsible AI Policy.

What if...?

I want to use an AI tool to assist me with my work including summarizing and drafting work emails. Can I do it? And can I use my personal email address or account to access public GenAI tools for work purposes?

We encourage you to use AI to maximize innovation and gain efficiencies as long as you do so by using AI tools approved by Honeywell Aerospace such as Microsoft 365 Copilot, which can help you summarize and draft emails. Other approved tools are listed in the Generative AI Standard. You may NOT use public GenAI tools for work purposes, nor may you circumvent security controls and policies put in place to protect Honeywell Aerospace data such as by using your personal email address or account for work purposes.

Social media and networking sites

Social media has changed the way many of us share information. While social media creates new opportunities for communication and collaboration, such media also brings additional responsibilities that we must know and follow. “Social media” sites include a vast array of websites and online resources. These include social networking sites (such as Facebook, Twitter, Instagram, Snapchat, YouTube, and LinkedIn), blogs, photo and video sharing sites, forums, and chat rooms, among many others. If your position at Honeywell Aerospace requires posting on such sites, as a representative of Honeywell Aerospace, you must only do so for authorized Honeywell Aerospace business purposes and only post information that complies with this Code and Company policies. In your personal “social media” interactions, act responsibly. What you post can adversely affect Honeywell Aerospace’s reputation. Be careful to protect our reputation at all times. Never post confidential information about Honeywell Aerospace or our colleagues, customers, suppliers, or business partners on any such sites.

For more information, see our Social Media Policy.

What if...?

I am excited about a potential new business project for Honeywell Aerospace. I want to share the news on my Facebook account. Is this a problem?

Yes. Honeywell Aerospace employees are not allowed to share confidential or proprietary information regarding the Company’s potential ventures on their social media networks or otherwise.

I am thrilled about a business deal that is showcased on the Honeywell Aerospace website. I want to share it on my LinkedIn and Twitter accounts. What is the right way for me to share this news on my social media?

If you listed Honeywell Aerospace as your employer and you include a disclosure of your relationship to Honeywell Aerospace on your post, you can share a link to the Honeywell Aerospace.com article. You can also share any posts that appear on official external Honeywell Aerospace channels.

I was reading an article online that contained inaccurate information about Honeywell Aerospace products. I quickly respond in the comment section to correct such statement. Is it appropriate?

You are not authorized to speak on behalf of Honeywell Aerospace. Instead, you should notify your manager and the Communications team, who will determine whether and how to respond.

Insider trading

Honeywell Aerospace policy establishes standards for employees and others who have material inside information and prohibits insider trading. During the course of your work with Honeywell Aerospace, you may learn about material inside information regarding Honeywell Aerospace or another company that is not yet public. Using this information or conveying this information to others for financial or other personal gain is a violation of our insider trading policy and may also violate securities laws. Such laws make it unlawful for any person who has "material inside information" about a company to trade the stock or other securities of that company or to disclose such information to others who may trade. Violations of such laws may result in civil and criminal penalties.

Further, you are prohibited from participating in any prediction markets, betting, event contracts, or other speculative activities where Honeywell Aerospace is the subject of a bet, contract or prediction, or if Honeywell Aerospace's confidential information, including confidential information regarding third-parties with which Honeywell Aerospace is or may be considering a relationship, is used to participate in such activities. Personal betting, event contracts or speculative activity involving Honeywell Aerospace or Honeywell Aerospace-related confidential information may be illegal, may result in improper use of company information, and may also create a conflict of interest.

Examples of material inside information

"Material inside information" is information that is not generally available to the investing public and, if disclosed, would reasonably be expected to affect the price of a security or would influence your decision to buy, sell, or hold a security. Examples of material inside information may include: unannounced earnings; mergers, acquisitions, and dispositions; the outcome of major litigation; a change in control; a change in senior management; or a significant cybersecurity event. This list of examples is not exhaustive and material inside information may arise in connection with other events not listed here. You should consult the Insider Trading Policy for a more detailed discussion on material inside information.

To avoid violating our insider trading policy and securities laws, DO NOT:

- Buy or sell shares in any company, or recommend buying or selling shares in any company, including Honeywell Aerospace, either directly or through family members or other persons or entities, if you have material inside information about that company.
- Convey material inside information to others outside the Company unless it is necessary for the Company's business activities, and it is conveyed under confidentiality protections.

Certain individuals, because of their positions with the Company (including the Company's directors, officers, and other key employees involved in certain financial and other forecasting activities), are viewed as possessing material inside information and are designated as "insiders." These individuals are subject to additional restrictions (such as pre-clearance authorization) which are more fully described in the Insider Trading Policy.

If you have material inside information about a company (including Honeywell Aerospace), you may only trade in that company's securities once the information is made publicly available to ordinary investors through appropriate media sources.

If you have questions or need guidance in this area, please consult the Law Department.

Honeywell Aerospace: How we treat our customers

Building mutually beneficial relationships with our customers is important to our success as a Company. Maintaining such relationships requires that we provide safe, quality products and uphold the law in all our interactions with both commercial and government clients.

Providing quality products and services

We strive to provide products and services that meet or exceed our customers' requirements for quality, reliability, and value.

We are expected to comply with all quality control standards that govern our job duties. This includes applicable laws and regulations, as well as internal control procedures designed to promote the safe, quality manufacture of goods. We are also expected to follow all contract specifications and honor built-in client specifications at all times.

In addition to holding ourselves accountable for quality goods and services, we must also hold our suppliers and other business partners accountable to ensure the quality of the products and services they provide to us.

What if...?

I discovered a potential product safety problem during routine production line testing. Should I speak up about this, even if I don't know all the details?

Yes. Producing and selling potentially unsafe products could result in injury. You should report the problem immediately, even if you aren't sure if it is an issue. You should make your supervisor, quality assurance contact, or health and safety representative aware of the issue as soon as possible. If you believe your concerns are not being adequately considered, you should report the concern to the Law Department or via the Aero Integrity Helpline, as discussed in "Reporting Channels."

Seeking business openly and honestly

Our actions in the marketplace define who we are as a Company. By competing on the quality of our goods and services, we uphold Honeywell Aerospace's reputation. We will never seek to limit the competitive opportunities of our rivals in deceitful or fraudulent ways.

In addition, we never take advantage of anyone through unfair dealing practices. This means that we are careful not to misrepresent the quality, features, or availability of our products or services. In addition, we do not disparage or make untrue statements about our competitors' products or services. We seek to win business based on the quality of our products and our people, not through any improper means.

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 Aerospace employee or someone acting on Honeywell Aerospace'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 Aerospace. Honeywell Aerospace will not tolerate commercial bribery or unlawful kickbacks, whether it is done directly or through a third party.

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, facilitation 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 Aerospace prohibits improper payments to government officials. It is 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 and the "Gifts and Business Entertainment" section of our Code.

What if...?

I would like to appoint Sales Rep Co as a sales representative to help Honeywell Aerospace win new projects with a foreign defense ministry. I find out that the owner of Sales Rep Co is also a board member of the state-owned defense company, my key potential customer. I think this is great for Honeywell Aerospace because the owner would have access to all levels of the customer. Is there anything I should be concerned about?

Yes, there is a potential conflict of interest related to the overlap of official duties of the owner of Sales Rep Co with the Sales Rep Co.'s duties to Honeywell Aerospace. You must immediately contact the Integrity and Compliance Department. In addition, Honeywell Aerospace prohibits commission-based compensation structures for sales representatives unless (i) required under local law, and (ii) approved by the Integrity and Compliance Department.

What if...?

I am concerned that Honeywell Aerospace will likely lose a big contract if she doesn't pay a local official a bribe. It appears our competitors are not limited like we are at Honeywell Aerospace. What should I do?

By Honeywell Aerospace policy and by law in all areas that we do business, it is inappropriate and not legal to pay a bribe or take any actions that would transfer a benefit to a government official, directly or through an intermediary, including a vendor. No contract is worth violating the law or our standards of business integrity. The potential long-term damage to Honeywell Aerospace's reputation and credibility more than offsets the short-term gain of winning the contract. Often rumors that competitors play by different rules are unsubstantiated or ultimately result in those companies suffering negative consequences. We act consistent with our values and the Code and do not justify our actions based upon potential lower standards other companies may employ.

I am waiting to enter a country when the immigration official asks me for a 'donation' for my visa to be processed. I heard that this is the norm, and visitors give a small amount to expedite the process. I pay the 'donation' to the official, and he stamps my passport. Can I get it reimbursed by Honeywell Aerospace?

No, in this case, your life was not in danger, so you should not have paid and cannot claim money back from Honeywell Aerospace. Facilitation payments or payments to officials to expedite routine government approvals are prohibited by Honeywell Aerospace unless the employee's life is in danger. Such fees are a violation of anti-corruption laws in most countries. In such situations, Honeywell Aerospace employees should contact Global Security or Integrity and Compliance Department.



Compliance with international competition laws

Fair competition creates a healthy marketplace and ensures our customers receive the best, most innovative products and services at competitive prices. We are committed to competing lawfully and with integrity in every country where we do business and to complying with all applicable competition (antitrust) laws. These laws are often complex, but they are designed to promote open markets and prohibit actions that may unfairly restrain trade.

Why it matters
Maintaining fair competition strengthens our reputation, supports innovation, and protects our relationships with customers, partners, and regulators. Violations can undermine trust and damage the Company's credibility. We must never use any illegal or unethical means to get information about other companies.

What this means for you

- Do not discuss or exchange competitively sensitive information with competitors, including pricing, bids, costs, customers, territories, or business strategies.
- Never engage in agreements or understandings with competitors to fix prices, rig bids, or divide markets, territories, or customers.
- If a competitor attempts to discuss inappropriate topics, stop the conversation immediately and report the incident to your supervisor or the Law Department.
- Exercise caution when attending trade association meetings, industry events, or informal gatherings where competitors may be present.

Working with customers, suppliers, and partners
Competition laws also apply to our relationships with suppliers, distributors, and customers.
This means we:

- Do not enter into agreements that restrict competition, such as improper resale price restrictions, tying arrangements, or refusals to do business.
- Properly manage and record costs and commercial terms to ensure transparency and compliance.

Protecting sensitive information

- Do not share or exchange employee compensation or benefits information with competitors.
- Do not enter into agreements with other companies not to solicit or hire each other's employees.
- Only obtain and use competitor information from lawful, ethical, and authorized sources, and handle it in accordance with Company policy.

When in doubt
If you are unsure whether a discussion, agreement, or activity may raise competition law concerns, seek guidance from the Law Department before proceeding.

For more information, see our Antitrust Compliance Policy. Please note that violating these laws may subject both the individuals involved and our company to severe consequences. If you have any additional questions, seek guidance from our Legal Department before acting.

What if...?

My friend works for a Honeywell Aerospace competitor. He reveals to me his company's intent to raise prices on products that are in direct competition with Honeywell Aerospace's. I feel this information could be important for Honeywell Aerospace to use in making future business decisions. What should I do?

You should end the conversation immediately and provide a written summary to the Law Department. Engaging in discussions with competitors on nonpublic, competitively sensitive information could create the impression of an illegal, anticompetitive agreement between the companies, which could have serious consequences for all involved, including providing circumstantial evidence of a conspiracy.

Following accurate billing procedures

Our reputation in the marketplace is a critical Company asset. For that reason, we reflect accurately on all invoices to customers the sale price or cost of goods or services sold and other terms of sale. We each have a responsibility to maintain accurate and complete records in order to allow Honeywell Aerospace to uphold this commitment. Never falsify any record – timecard, expense report, sales numbers, test or quality records, or any other kind of record created during the course of your work for our Company – or make misleading or artificial entries on Honeywell Aerospace's books or records.

Labor charging

We are committed to the accurate, honest, and timely recording of all labor, ensuring that time is charged only to the appropriate project, contract, or task that reflects the work actually performed. Employees must charge time only to activities they are authorized to perform and must never misrepresent, shift, or conceal labor charges. Accurate labor charging is essential to maintaining the integrity of our customer billing, cost estimating, and financial reporting processes, as well as compliance with applicable policies and contractual requirements. All costs – including those that are unallowable or non-reimbursable – must be properly identified and recorded to the correct charge codes. Employees are responsible for promptly entering their time, maintaining appropriate supporting documentation where required, and seeking guidance if they are unsure how to record labor or costs. Managers must reinforce a culture of integrity in labor charging, ensure adequate training and oversight, and never encourage or tolerate practices that compromise accuracy or compliance.

Please refer to our Time Recording and Pay Practices Policy.

Respecting customer confidential information

At times, our customers may share their confidential information with us so that we may provide them with products and services. It is our responsibility to use, store, and carefully safeguard any such information in a manner that complies with all applicable laws. We each must take the necessary steps to secure this information and ensure it is used only for approved business purposes.



Interacting with government customers

For some of us, our work involves contracts with government entities, including government-owned or -controlled companies. In these cases, we have a duty to know and follow applicable Company policies and the established laws, rules, and regulations that govern our interactions with government customers. It is important to note that these rules may be stricter and more complex than those governing our dealings with commercial clients.

We must always conduct ourselves with honesty and integrity when attempting to win government work. This means, in part, that:

- We may not take actions that would give Honeywell Aerospace an unfair competitive advantage, such as obtaining or using sensitive procurement information.
- All representations we make, including pricing and bids, must be accurate and complete.
- We must never offer, solicit, promise, give, or accept any form of bribe or kickback to or from an actual or potential government customer.
- We must never solicit or accept any form of bribe or gift from a supplier in exchange for favorable treatment in the award or performance of a government contract.
- We must ensure we only use reputable consultants, sales agents, or other professional service independent contractors for legitimate legal purposes.

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

All statements and records that we provide to government customers (including facility and quality reports and cost and pricing data) must be accurate.

Hiring or engaging former government employees

We must follow all applicable rules and regulations that govern how we engage current or former government employees in discussions about potential job opportunities at Honeywell Aerospace. We are each responsible for avoiding these types of conflicts of interest. Contacting or engaging in employment-related discussions with current or former government employees is subject to unique rules and procedures. These rules may also restrict the work that former government employees perform on our Company's behalf.

Please refer to our Hiring or Engaging Former Government Employees Policy.

Safeguarding classified information

We also are expected to safeguard classified and other sensitive information we acquire in connection with the work we do for our government clients. As required by the terms of our government contracts and other applicable regulations, we make this information available only to those who have a business need to know it and who have obtained the appropriate government clearance or other approvals. We must not share, distribute, or disclose classified or otherwise sensitive government information in a manner that would violate the terms of our government contracts.

Mandatory disclosure

Honeywell Aerospace complies with all applicable laws and regulations that require disclosure of certain types of misconduct to government customers or regulators. These may include suspected violations involving fraud, conflicts of interest, bribery, or illegal gratuities, as well as certain billing or pricing errors and customer overpayments related to government contracts.

If you become aware of or suspect such violations, you must promptly report your concerns through the appropriate "Reporting Channels" or consult Integrity and Compliance or the Legal Department.

Honeywell Aerospace: How we treat our suppliers

Honeywell Aerospace's suppliers are our partners in our ongoing drive for customer satisfaction. The high caliber of the materials, goods, and services they provide is linked directly to the quality, reliability, value, and prompt delivery of Honeywell Aerospace products to our customers.

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. In addition, we never take unfair advantage of our suppliers through abuse of confidential information, misrepresentation of material facts, or any other unfair dealing practice.

At Honeywell Aerospace, we allow suppliers to compete fairly on the quality of their products and services. We will not be influenced by gifts or favors of any kind from our suppliers or potential suppliers. An occasional meal or entertainment in the normal course of business relations may be permissible, as long as:

- The representative of the supplier is in attendance.
- Such hospitality is not excessive or unusual in nature.
- The hospitality complies with applicable laws and is not otherwise prohibited by this Code.

In addition, when practical, hospitality should be reciprocated.

For more information, see the "Gifts and Business Entertainment" and "Interacting with Government Customers" sections of our Code.

Protecting supplier assets

We treat supplier confidential information with the same care as we treat Honeywell Aerospace confidential information. We will not reproduce software provided to us by a supplier, nor will we incorporate it into our own internally developed software unless we are expressly permitted to do so by license.

Honeywell Aerospace: How we treat our shareholders

At Honeywell Aerospace, we strive every day to build value for the shareholders who have placed their trust in our Company and in each of us. To achieve this goal and create value for our shareholders, we must do business with transparency and integrity.

Honest and accurate books and records

Our shareholders rely on us to maintain accurate and complete books and records. These documents form the basis for all of our public disclosures and filings, which aim to give our shareholders and the public an accurate view of our Company's operations and financial standing. In addition, Honeywell Aerospace uses these documents to analyze Company operations and make important business decisions.

We have a duty and a legal obligation to make sure that the information we submit in all Company records is complete, accurate, and understandable. This includes, but is not limited to, all of the information we provide in the following records:

- Accounting and financial records
- Payroll documents
- Timecards and time recording systems
- Travel and expense reports
- Measurement, product testing, and performance records
- Customer and supplier records
- Design and engineering records
- Export and import declarations and records
- Project accounting records

Honest and accurate books and records play a significant role in our Company's reputation. As such, we must never make a false or misleading representation in any Company documents.

Our Company's transactions will be executed only in accordance with management's general or specific authorizations. See our Delegation of Authority Policy and Schedule of Executive Approvals for more information.

What if...?

I am working on a government contract project. and I need my manager's approval for my weekly timesheets, but my manager is on vacation. Can I approve my timesheets on behalf of my manager?

No. Approving your own time sheets represents a segregation of duties conflict and jeopardizes management controls. Your manager should ensure appropriate delegation of his/her approval duties.

What if...?

I need to process a purchase order for an amount that triggers senior executive approvals. Can I split the invoice to get through the system quickly?

No. All transactions must be executed according to the Schedule of Executive Approvals and must reflect the business nature. You should never split a purchase order.

I am helping develop new technology for military aircraft. Honeywell Aerospace must certify to the customer that the new technology meets required technical standards. Can I certify to the customer prior to completing the work to ensure that the technology meets the required standards?

No. Every Honeywell Aerospace representation must be accurate at the time that it is made. This includes certifying compliance to specific technical standards.

Account managers are struggling to meet their quarter-end revenue targets. They have upcoming orders, but the customer is not ready for shipment yet. Can they bill the customer and hold the shipment until the customer is ready to receive it in order to recognize revenue?

No. Transactions where Honeywell Aerospace recognizes revenue upon the sale, but the product remains in Honeywell Aerospace's physical possession (i.e., "bill and hold.") can sometimes be legitimate. But in this case, the account managers want to bill the customer without shipment to inflate revenue, which is not appropriate.

Financial disclosures and fraud

Those of us with finance and accounting responsibilities have a special duty to ensure that our Company's financial statements are true and fair. Since Honeywell Aerospace is a U.S.-based public company, we must submit various financial reporting and other filings to U.S. regulatory authorities. It is critical that these documents are accurate and timely. Therefore, if you have related responsibilities, you must comply with the legal and regulatory requirements that govern these reports. You also must know and follow Honeywell Aerospace's internal controls that govern the same. Inaccurate, incomplete, or untimely records or reporting may result in legal liability for the Company and for those involved.

Anyone found to have engaged in financial fraud will be subject to disciplinary action and could face substantial civil and criminal liability. You must report any suspected accounting or auditing irregularities immediately. Honeywell Aerospace will not tolerate retaliation against you for disclosing, in good faith, questionable or improper accounting or financial matters.

Anti-money laundering

Money laundering is the process of transforming the assets (including, but not limited to, funds or proceeds) of criminal activity into assets that look legitimate and can be moved through the financial system without suspicion. It is important to note that this practice is not limited to cash transactions. Complex commercial trade transactions may hide financing for criminal activity such as terrorism, illegal narcotics trade, bribery, and fraud. Involvement in such activities undermines our integrity, damages our reputation, and can expose Honeywell Aerospace and individuals to severe sanctions.

Our Company forbids knowingly engaging in transactions that facilitate money laundering. We take affirmative steps to detect and prevent engaging in transactions with disreputable counterparties and/or participating in suspicious or illegal commercial transactions and payments. Honeywell Aerospace is committed to compliance with anti-money laundering laws throughout the world and will conduct business only with permissible parties involved in legitimate business activities and transactions.

For more information, please review the Anti-Money Laundering Policy.

Audits and investigations

We all share a responsibility to cooperate with external and internal audits and investigations. This means we must provide auditors and investigators the information to which they are entitled and maintain the confidentiality of the investigation. In addition, we may never attempt to interfere with or improperly influence their review. Refusal or failure to cooperate fully with an internal Honeywell Aerospace or government investigation, or the failure to be fully truthful when providing evidence or testimony in such investigation, may result in disciplinary action, up to and including termination. If you have any questions about what information an auditor or investigator is requesting and entitled to obtain, consult with the Law Department or Corporate Audit. If contacted regarding a governmental investigation, you must contact the Law Department as soon as possible before proceeding. The Law Department will have primary oversight over any internal investigation or audit involving a governmental investigation or litigation matter.

Records management

It is our shared responsibility to retain Honeywell Aerospace business records as long as needed for business purposes or longer, if required by law, tax, regulatory, or other standards. In addition, we need to know when and how to destroy these business records appropriately. Employees must follow all rules set forth in our Records Management Policy. The Records Management Policy includes the Records Retention Schedule, which provides guidance regarding the length of time various records should be retained. Honeywell Aerospace encourages employees to review their records on a regular basis and to purge old documents in accordance with the Records Management Policy. Purging documents in compliance with our Policy helps to reduce records storage costs, but it is critical to do so in accordance with document destruction rules.

If you know that documents in your control may be relevant to a lawsuit or government investigation, do not alter, conceal, or destroy them. In some cases, the Law Department may instruct you to preserve certain documents that might otherwise be destroyed under Honeywell Aerospace's Records Management Policy. In such cases, you should follow the instructions provided by the Law Department.

Time sensitive and important legal and business mail and other forms of correspondence may be received by Honeywell Aerospace at any of its offices globally. All Honeywell Aerospace employees must take steps to open, review, and process all correspondence in a timely manner, regardless of the method of delivery. If you become aware of any actual or potential legal proceeding or investigation involving Honeywell Aerospace, you must immediately notify a member of the Law Department, and you must do so before engaging with a third party on same.

TIP: If you receive a legal notice of any type through Company mail, email, or any other means of communication, you must report it immediately to the Law Department and/or your manager for immediate escalation.

Inquiries from the media and analysts and outside speaking events

We strive to provide clear and accurate information to the media, financial analysts, and the general public. This helps us maintain integrity in our relationships with our external stakeholders, which in turn strengthens our corporate reputation. Since accurate information is so crucial, only certain individuals are permitted to communicate with the media, financial analysts, and members of the investment community on Honeywell Aerospace's behalf. If you receive a request for information from the media, forward it to Corporate Communications. If you receive a request from a financial analyst or member of the investment community, do not respond on your own, but rather, forward it to Investor Relations for handling.

Any Honeywell Aerospace employee who wishes to present a Honeywell Aerospace product, system, operating method, research, or their own work at an industry conference or other event must get approval in advance from their direct supervisor and the Law Department. Presentations must (i) be consistent with current Company brand standards; (ii) be consistent with the Company's Investor Relations messaging; (iii) be consistent with Company strategy; and (iv) not impart confidential or proprietary information. Additional approvals are required for presentations related to cybersecurity or environmental, social and governance (ESG) matters.

For more information, please see our External Communications Policy.



Honeywell Aerospace: How we treat our communities and our world

In order to grow as a Company, we must have a positive impact on the communities that sustain us. We must strive to respect and protect not only the communities where we live and work, but also our planet and its inhabitants.

Protecting the environment

We are committed to health, safety, and the environment, and to social considerations in the communities in which we operate. As part of this commitment:

- We minimize the environmental footprint of our operations through prevention of illness, injury, and pollution.
- We actively promote and develop opportunities for expanding our sustainability profile by increasing energy, fuel, and water efficiency, improving security and safety, and reducing emissions of harmful pollutants.
- We are committed to compliance with all our health, safety, environmental, and legal requirements everywhere we operate.
- Our commitment to health, safety, and the environment is an integral aspect of our design of products, processes, and services, and of the lifecycle management of our products.
- Our management systems apply a global standard that provides protection of both human health and the environment during normal and emergency situations.
- We identify, control, and endeavor to reduce hazards and associated risks (to employees and contractors), emissions, waste, and inefficient use of resources such as energy and water.
- We are open with stakeholders and work within our communities to advance laws, regulation, and practices that safeguard the public.
- We abide by our Company's own strict standards in cases where local laws are less stringent.
- Our senior leadership and individual employees are engaged in aspects of health, safety and the environment and are accountable for their role in meeting our commitments.
- We measure and periodically review our progress and strive for continuous improvement.

If you have a concern about workplace health, safety, or environment, please contact your local supervisor, a member of the Health, Safety Environment, Product Stewardship and Sustainability function, or visit the HSE website.

Respecting human rights

At Honeywell Aerospace, we are committed to supporting human and workplace rights in our global operations and supply chain. We believe that workers should be treated with fairness, dignity, and respect, and we seek to ensure that every employee has a voice in our workplace. This commitment is grounded in international human rights principles that independent organizations have proposed, such as the United Nations Guiding Principles on Business and Human Rights, Ten Principles of the United Nations Global Compact, the International Labor Organization's Declaration on Fundamental Principles and Rights at Work, and all applicable laws of the jurisdictions where we operate.

Our Code and our Human Rights Policy, along with other Honeywell Aerospace policies, establish practices and standards that address a broad range of human rights and workplace issues, such as Inclusion and Global Mindset, Workplace Respect, Freedom of Association, Safe and Healthy Workplace, Workplace Security, Work Hours and Wages, Forced Labor and Human Trafficking, and Child Labor. Honeywell Aerospace respects and values the diversity reflected in our various backgrounds, experiences, and ideas. Together, we provide each other an inclusive work environment that fosters respect for all of our coworkers and business partners. Refer to the section titled "Respecting Each Other and Promoting a Positive Workplace" for more information.

Our Company does not condone or employ child labor. At Honeywell Aerospace, we will not employ anyone under the age of sixteen, even if authorized by local law. If local law is stricter than Company policy, we will comply with that law. In addition, we will never use forced, indentured, or involuntary labor in any of our operations, and we will not tolerate exploitation of children, physical punishment, or abuse. As part of our commitment to our communities and our world, Honeywell Aerospace will not tolerate any instances of human trafficking, or other forced labor. We will also never conduct business with any third parties (such as agents or suppliers) who engage in human trafficking or forced labor. Honeywell Aerospace has adopted a Supplier Code of Conduct that provides clear expectations for suppliers to ensure that they treat their employees with dignity and respect.

For more information, please see our Human Rights Policy.



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 Aerospace property for personal political activities. In addition, we should never engage in any political activities on Honeywell Aerospace's behalf, unless authorized by the Government Relations function. Never coerce a coworker, especially those with whom you have a reporting relationship, to support your particular causes.

As interested citizens, Honeywell Aerospace 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 Aerospace Public Affairs Council (HONA PAC), provided they meet certain legal requirements. To determine if you are eligible to participate in the HONA PAC, 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 Aerospace's behalf without authorization from the Government Relations function. For more information, please see our Government Relations Policy.

Honeywell Aerospace 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 Aerospace may engage in such charitable activities, so long as both the charity and the activity have been approved by management, the Law Department, or by using the charitable contribution and sponsorship tool, Benevity (Honeywell Aerospace Community and Social Impact) and obtain Integrity and Compliance Department pre-approval before proceeding.

You may not send emails in an attempt to raise money for an unapproved charity or any other fundraiser on Honeywell Aerospace's network. In addition, you may not use Honeywell Aerospace assets, including Company time, for personal charitable pursuits.

International trade controls

Honeywell Aerospace is committed to compliance with all applicable trade laws. This includes import and export control, trade, sanctions and Anti-Boycott laws, as well as regulations in the countries where our Company does business.

Those of us who deal with the importation of goods and export-controlled items, technology, and services have an obligation to understand and comply with applicable regulations. This includes import and export laws, trade sanctions, technology control plans, the conditions, and provisions of export license authorizations that may apply to specific businesses or facilities.

Export control laws

Export control laws govern the transfer of goods, services, and technology from one country to another country. Export controls govern many types of exchanges of technology or technical information across national borders, including email transmissions access to different servers that could contain export controlled technical data, and technical discussions. U.S. export laws and regulations also control the transmission and/or sharing (electronically, orally, or visually) of export-controlled technical data to non-U.S. persons within the United States.

What if...?

My customer is facing an urgent situation whereby they need Honeywell Aerospace to send product (hardware, software, or proprietary information) to solve an emergency (e.g., an aircraft on ground situation or a factory that has been rendered offline due to failing controls, etc.) but I do not know the classification. Can I go ahead and ship, given the emergency?

No. You cannot ship product without first confirming the export classification and ascertaining whether an authorization would be required to ship the product. Please contact your Export Compliance Officer for guidance or refer to the Export Compliance SharePoint Site for more information.

One of my customers has come to me at the end of the quarter with an urgent need for Honeywell Aerospace product for a project. I am aware that the customer will be supplying the product to another company, but I don't know who. Since I know and trust my customer, do I need to get the end user information?

Yes. Prior to engaging in any transactional activities, you should confirm that all external third parties (vendors, customers, end users, etc.) to the transaction have been screened for third-party risks, including trade risks through Honeywell Aerospace's automated screening tools in our systems. If you are not sure whether screening has happened or the particular transaction is not screened through our systems, you are expected to manually screen all third parties through our screening tools available on the Sanctions SharePoint Site. Please be sure to raise any screening matches or questions to your Export Compliance Officer or to Sanctions Compliance prior to proceeding.

Import control laws

Import laws and regulations govern the importation of goods. Such laws ensure that only admissible goods enter into the importing country, and that the correct amount of duties and taxes are paid on those goods. Honeywell Aerospace must maintain, among other things, accurate information on the commodity/nomenclature, commercial value, and country of origin of all imported goods.

Sanctions laws

Trade sanctions laws and regulations govern a wide range of political and/or economic measures that restrict and/or prohibit transactions with specific countries/jurisdictions, entities, industries, individuals, and aircraft/vessels. There is wide variation in the types of sanctions that may apply to a particular transaction, including but not limited to: comprehensive sanctions on a particular country/jurisdiction; selective prohibitions on entities, individuals, and aircraft/vessels; and/or selective restrictions on a transaction's financing or activities. Honeywell Aerospace must consider trade sanctions implications when engaging in any of its relationships with third parties.

What if...?

I have done business with a customer for many years. I learned that they are in a country that requires sanctions review. Since we have been working together for years, why is a sanctions review required?

Economic and trade sanctions are long-standing foreign policy tools directed at specific countries, individuals/entities, or activities that a government determines have acted contrary to foreign policy and national security objectives. Because sanctions laws, which impose restrictions and prohibitions on engagement with certain countries and individuals/entities, can change rapidly, it is critical to follow review requirements even for long-standing customers who have never raised issues. Please monitor the list of the countries requiring Sanctions Compliance review on the Sanctions SharePoint Site.

Anti-boycott

U.S. anti-boycott laws prohibit individuals and entities from participating in a boycott that the U.S. does not support. Antiboycott laws help prevent U.S. companies from being used to implement foreign policies of other nations which run counter to U.S. policy. Honeywell Aerospace does not cooperate with foreign boycotts that are not approved by the U.S. government. If we receive a request related to any boycott, we must not respond to the request and immediately report the request to antiboycott@honeywellaerospace.com for disposition, including any reporting required.

For more information on International Trade Controls, please see our Export Compliance, Import Compliance, and Sanctions Compliance and Anti-Boycott policies for more information.

Waivers of our code

In extremely limited circumstances, Honeywell Aerospace 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 Aerospace. All waivers for members of the Board of Directors or for executive officers of Honeywell Aerospace require the pre-approval of the Board of Directors and will be promptly disclosed when required by regulation or law. When a waiver is granted, the Board shall ensure that appropriate controls are in place to protect the Company and its shareholders.

For more information
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