



**HONEYWELL HOLDINGS Pty Ltd (AU)  
and HONEYWELL LIMITED (AU) JOINT  
MODERN SLAVERY STATEMENT  
FINANCIAL YEAR 2020**

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# Honeywell

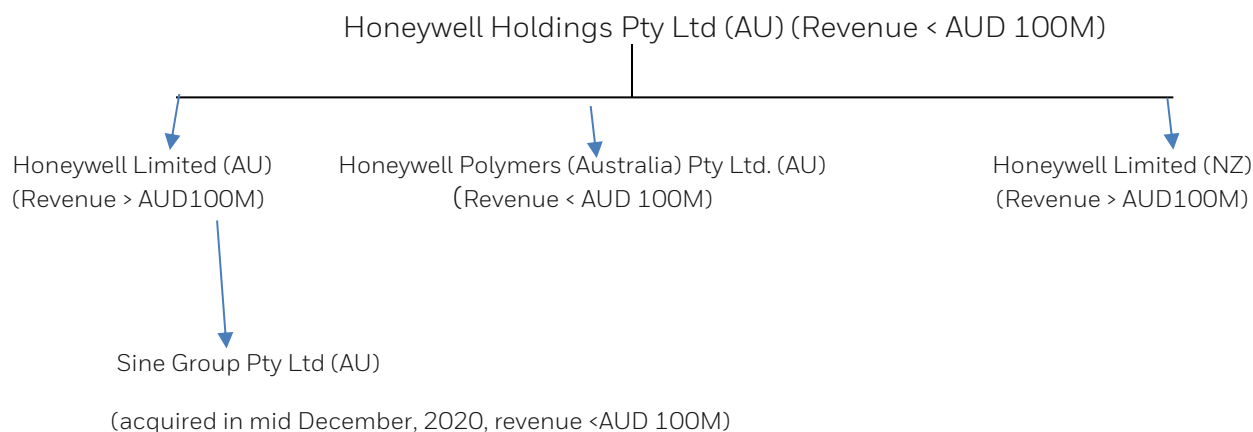
## 1. Reporting Entity

This Joint Statement is provided on behalf of Honeywell Holdings Pty Ltd (ABN 18000383764), a holding proprietary company for the purpose of the Corporations Act, 2001 with its registered office at Level 3, 2 Richardson Place, North Ryde NSW 2113 and Honeywell Limited (AU) (ABN 74 000 646 882) (a large company for the purposes of the Corporations Act, 2001 with its registered office at Level 3, 2 Richardson Place, North Ryde NSW 2113 (collectively referred to as “**Honeywell Australia**”).

## 2. Our structure, operations and supply chain

### 2.1 Our Structure

Honeywell Holdings Pty Ltd is the parent company of Honeywell limited (AU), Honeywell Limited (NZ) and Honeywell Polymers (Australia) Pty Ltd. Below is the detailed entity structure:



### 2.2 Operations

Honeywell Australia is ultimately owned by Honeywell International Inc. (“Honeywell”), a global, diversified, technology-driven industrial company headquartered at 300 S. Tryon Street, Suite 600, Charlotte, NC 28202. Honeywell Limited employs approximately 1200 employees and manages the business operations through different business segments: Aerospace (AERO), Performance Materials and Technologies (PMT), Safety and Productivity Solutions (SPS), and Honeywell Building Technologies (HBT).

Honeywell as a global company operates its business all over the world and has global policies, procedures and guidance. Honeywell Australia is subject to all applicable Honeywell global policies, including policies that relate to Honeywell’s expectations of its directors, officers, employees, suppliers and business partners.

## 2.3 Honeywell Limited's Supply Chain

Honeywell Limited procures a vast variety of products and services from suppliers around the world. Given the nature and geography of Honeywell Limited's business our supply chain is both extensive and diverse.

## 3. Risks of modern slavery practices in Honeywell's supply chain

Honeywell Limited does not underestimate the task of identifying the modern slavery risks that exist across its operations and supply chains; a task that is magnified by the breadth of products and services we offer our customers. Our biggest risk is perceived to be the use of unskilled, temporary or seasonal labour, use of short-term contracts and outsourcing, use of foreign workers or temporary or unskilled labour to carry out functions which are not immediately visible because the work is undertaken at night time or in remote locations, such as security or cleaning for HBT projects and services.

## 4. Actions taken to assess and address modern slavery risks

Honeywell has **zero tolerance** for human trafficking and slavery.

Honeywell has measures in place to communicate zero tolerance to Honeywell's employees, agents and suppliers so that they do not engage in human trafficking and slavery activities and continually revises those measures to keep in step with relevant legislations, such as:

### 4.1 Honeywell's Code of Business Conduct

Honeywell's Code of Business Conduct applies to all directors, officers and employees across all business and in all countries, including Australia. It is a baseline set of requirements that sets a common understanding of how we treat employees, our customers, suppliers, shareholders and communities, and enables employees to recognize and be aware of how to report integrity, compliance and potential legal issues. The Code of Business Conduct outlines Honeywell's commitment to respect for human rights and our pledge to recognise the dignity of each individual.

Honeywell's Code of Business Conduct specifically addresses child labour and the use of forced, indentured or involuntary labour and declares that "Honeywell will not tolerate any instances of human trafficking or other forced labour. We will never knowingly conduct business with any third parties who engage in human trafficking or forced labour."

### 4.2 Honeywell's Supplier Code of Conduct

Honeywell also expects its supply chain to abide by its [Supplier Code of Business Conduct](#). The Supplier Code of Business Conduct is flowed down to Honeywell's global suppliers, which in turn are requested to ensure that the same requirements are met throughout the supply chain.



The Supplier Code of Business Conduct sets forth the expectation that Honeywell's suppliers shall not traffic in persons or use any form of slave, forced, bonded, indentured, or involuntary prison labor. This includes a prohibition on the transportation, harboring, recruitment, transfer, or receipt of persons by means of threat, force, coercion, abduction, fraud, or payments to any person having control over another person for the purpose of exploitation.

As part of this commitment to prohibiting human trafficking, suppliers may not engage in any of the following conduct:

1. Destroying, concealing, or confiscating identity or immigration documents;
2. Using fraudulent recruiting tactics; or
3. Charging employees unreasonable recruitment fees or providing inadequate housing based on local standards, laws and directives.

The Supplier Code of Business Conduct also stipulates that suppliers are to adopt and implement a management system to ensure compliance the Supplier Code of Business Conduct and all applicable laws, regulations and customer requirements. The minimum requirements for the management system include, amongst others, the need for risk assessment and management and the implementation of training and a corrective action process.

### **4.3 Audits**

Honeywell has a program in place to conduct audits of its supply chain to ensure compliance with the Supplier Code of Business Conduct, including Honeywell's policies regarding slavery and human trafficking. Honeywell reserves the right to terminate a supplier relationship if the supplier fails to comply with applicable legal requirements or the Honeywell Supplier Code of Business Conduct, including Honeywell's policies aimed at combatting slavery and human trafficking.

### **4.4 Internal Accountability**

Honeywell requires its employees to follow the Honeywell Code of Business Conduct and its Human Trafficking Policy. An integrity and compliance hotline is open at all times to all Honeywell employees, customers, suppliers and other individuals to alert the Honeywell Integrity and Compliance Team on an anonymous basis.

### **4.5 Training**

Honeywell employees are required to complete periodic training on the Honeywell policies and Code of Business Conduct.

All Honeywell employees are also required on an annual basis to certify that they have read and understand the Code of Business Conduct and that they have reported any concerns regarding potential violations of Honeywell's Code of Business Conduct.

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## 4.6 Supplier screening

Honeywell has developed standardized policies and processes to assess suppliers prior to selection including detailed compliance checks and rating assessments encompassing supply chain risk management to assist with developing a preferred suppliers list. All new suppliers must pass this assessment process prior to contracting.

During the reporting period, Honeywell subscribed to the Property Council of Australia's Modern Slavery platform which allows it to request suppliers to complete (or share any previously completed) modern slavery audit questionnaires and thereby assess any gaps that Honeywell may need to work through with its suppliers in order to strengthen their ability to meet Honeywell's strict requirements. Honeywell has prioritised HBT security and cleaning contractors to use the platform and intends to significantly expand deployment over the next reporting period.

Additionally, given the prevalent use of unskilled and migrant labour in cleaning, during the reporting period Honeywell implemented a new requirement that all newly onboarded or renewed cleaning contractors for HBT must be members of and comply with the Cleaning Accountability Framework

## 5. How we assess the effectiveness of our actions

Honeywell is committed in monitoring the effectiveness of its policies and we are transparent in the way we run and govern our business. Honeywell publishes a Corporate Citizenship Report that publicly outlines the development and implementation of its practices, values and standards.

## 6. Consultation

Given that Honeywell's supply chain is part of a larger global organisation, Honeywell Limited did consult and collaborate with its key global supply chain stakeholders in preparing this statement.

## 7. Other relevant information

Honeywell's global policies and procedures which are related to modern anti slaveries can be found online at below links:

- [Honeywell's Combatting Human Trafficking policy](#);
- [Honeywell's Code of Business Conduct](#); and
- [Honeywell's Supplier Code of Business Conduct](#).

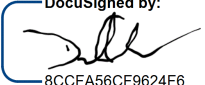
For information on Honeywell's performance please see [Corporate Citizenship Report](#) and [Annual Report](#).

# Honeywell

This statement is made for the financial year ending 2020. The Statement has been approved by the Board of Directors of Honeywell Holdings Pty. Ltd. (AU) and Honeywell Limited (AU) on the fifteenth of June, 2021 and is signed by David Arthur Glover who is a director of the Board of Honeywell Holdings Pt. Ltd (AU) and Gomathy S T Dorai who is a director of the Board of Honeywell Limited (AU).

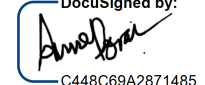
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Honeywell Holdings Pty Ltd (AU)

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Authorized Signatory: DAVID ARTHUR GLOVER

Honeywell Limited (AU)

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Authorized Signatory: GOMATHY S T DORAI