

# **MODERN SLAVERY STATEMENT FY21**

**HONEYWELL HOLDINGS PTY LTD  
HONEYWELL LIMITED**

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## **ACKNOWLEDGEMENT OF COUNTRY**

Honeywell acknowledges the Traditional Custodians of country throughout Australia and their connections to land, sea and community.

We pay our respect to the Elders both past and present and extend that respect to all Aboriginal and Torres Strait Islander peoples today.

# 1. INTRODUCTION

Honeywell Australia is pleased to provide its second Modern Slavery Statement in compliance with the Modern Slavery Act 2018 (Cth). Honeywell has zero tolerance for human trafficking and slavery and has measures in place to ensure that Honeywell employees, agents and suppliers do not engage in human trafficking and slavery activities and continually revises those measures to keep in step with relevant legislation.

Honeywell’s commitment is defined within its 2022 Slavery and Human Trafficking Statement, its Honeywell Code of Business Conduct, its Supplier Code of Conduct and its Human Rights Policy.

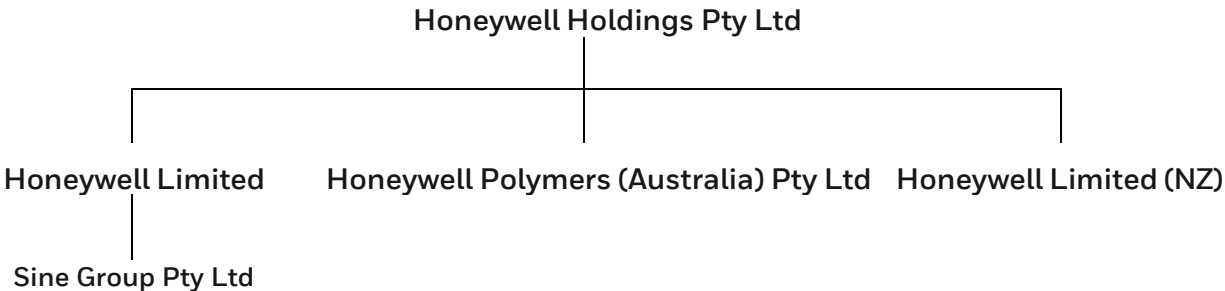
The expectations of Honeywell in respect of the above are endorsed by Honeywell’s Chairman and Chief Executive Officer and reinforced through various internal and external communication channels.

# 2. REPORTING ENTITY

This joint Modern Slavery Statement is provided by and covers Honeywell Holdings Pty Ltd (ABN 18 000 383 764) and Honeywell Limited (ABN 74 000 646 882) (collectively referred to as **Honeywell Australia**) as reporting entities under the *Modern Slavery Act 2018* (Cth).

# 3. OUR STRUCTURE, OPERATIONS AND SUPPLY CHAIN

## OUR STRUCTURE



Honeywell Australia’s ultimate parent is Honeywell International Inc. (**Honeywell**) which is headquartered in Charlotte, North Carolina.

## OPERATIONS

Honeywell operates in approximately 70 countries and employs approximately 103,000 employees, with about 1,500 employed in Australia. Contingent workers are utilised to a limited extent and are always engaged under Honeywell’s Human Rights Policy. Honeywell is a global technology-driven industrial company that manages business operations through four business segments:

- Aerospace
- Performance Materials and Technologies

- Safety and Productivity Solutions
- Honeywell Building Technologies

Honeywell Australia provides products and services in all states and territories nationally through a network of 20 site locations. Honeywell Australia operates in adherence with all of Honeywell's relevant global policies, procedures and guidance, and always acts with both a global and local mindset.

## **SUPPLY CHAIN**

Honeywell Australia procures a vast variety of products and services from suppliers around the world including products which are manufactured or produced by entities within Honeywell. Given the nature and geography of Honeywell Australia's business, our supply chain is both extensive and diverse. Honeywell's supply chain activities are managed by a global and local team of procurement specialists with expertise in risk management, procurement, supply management, operations management, logistics, and supply chain performance optimization.

## **4. RISKS OF MODERN SLAVERY PRACTICES IN HONEYWELL'S SUPPLY CHAIN**

Honeywell Australia 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 as we see it is 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 or in remote locations.

Honeywell Australia's assessment of such services which fall into a higher risk category are services such as security and cleaning services where Honeywell Australia engages contractors on various sites throughout the country.

## **5. ACTIONS TAKEN TO ASSESS AND ADDRESS MODERN SLAVERY RISKS**

Honeywell is committed to combatting the risk of modern slavery and human trafficking in our business and in our supply chain. Honeywell's values are reflected in our policies which are regularly reviewed and revised to ensure they remain current and appropriate.

## **HONEYWELL HUMAN RIGHTS POLICY**

At Honeywell, 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. Our [Human Rights Policy](#) applies to all Honeywell workers worldwide, including contingent workers, agents and candidates for hire. Honeywell also requires suppliers to uphold Human Rights principles as described in its Supplier Code of Business Conduct. Honeywell policy recognizes its responsibility in respect of inclusion and diversity, workplace respect, freedom of association, safe and healthy workplaces, workplace security, work hours and wages, forced labour and human trafficking, child labour and the rights of local communities.

## CODE OF BUSINESS CONDUCT

Honeywell's [Code of Business Conduct](#) defines what Honeywell expects from its directors, officers and employees across all business and in all countries, including Australia by outlining Honeywell's commitment to integrity and ethics, respect, and diversity and inclusion as fundamental expectations of working at Honeywell. It describes the basic rules of conduct 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.

## SUPPLIER CODE OF CONDUCT

Honeywell expects its supply chain to abide by its [Supplier Code of Business Conduct \(Supplier Code\)](#) which sets forth Honeywell's commitment to integrity and compliance within its global supply chain. When assessing potential suppliers, Honeywell considers a number of factors outside of price and seeks to partner with suppliers with similar values to Honeywell including suppliers who are committed to diversity and equality, sustainability and the expectation that its suppliers shall not traffic in persons or use any form of slave, forced, bonded, indentured, or involuntary prison labour. This includes a prohibition on the transportation, harbouring, 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.

The Supplier Code requires suppliers to adopt and implement a management system to comply with the principles set forth within the code and all applicable laws and regulations. The management system, at a minimum, is to contain the following elements:

- **Company Commitment and Management Accountability** through policy statements affirming the supplier's commitment to compliance and identifying a company representative[s] responsible for ensuring implementation of the management systems.
- **Risk Assessment and Risk Management** process to identify risks associated with the supplier's operations. As regulations continue to change and emerge, the supplier's management system should include a process to monitor and track regulatory activity that may impact its business and that of its customers relating to, but not limited to, environmental, restricted material usage, conflict minerals and hazardous waste.
- **Training Programs** for training managers and workers to implement the supplier's policies, procedures and improvement objectives and to meet applicable legal and regulatory requirements.
- **Standards, Audits and Assessments** to ensure conformity to legal and regulatory requirements, the content of the Supplier Code and customer contractual requirements.
- **Corrective Action Process** for timely correction of deficiencies identified by internal or external assessments, inspections, investigations and reviews.
- **Documentation and Records** to ensure compliance with the principles of this Supplier Code.
- **A Process to Communicate Supplier Code Requirements to Suppliers** and monitor supplier compliance to the Supplier Code.

Honeywell expects all of its suppliers to adhere to the Supplier Code and to ensure these requirements are met within their supply chain.

### **OUR 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 being engaged by Honeywell.

### **TERMS AND CONDITIONS**

Honeywell Australia has updated its terms and conditions for the purchase of goods and/or services from subcontractors in Australia to reinforce compliance with the Modern Slavery Act.

### **OUR INTEGRITY HELPLINE**

The Honeywell ACCESS Integrity Helpline is a 24-hour service answered by an independent third-party provider that accommodated all of the languages that Honeywell employees speak. It is open to all Honeywell employees, customers, suppliers and other individuals to alert the Honeywell Integrity and Compliance Team on an anonymous basis of any situations that may involve a violation of Honeywell codes or policies. Issues can also be reported by mail or email.

Honeywell will not tolerate any form of retaliation against anyone for making a good faith report of actual or potential misconduct

### **TRAINING**

Honeywell employees are required to complete periodic training on Honeywell policies and the 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.

### **INFORMED 365 PLATFORM**

Honeywell Australia has subscribed to the Property Council of Australia's Modern Slavery platform which is designed to assess modern slavery risk across supply chain. It allows Honeywell 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. Over the duration of the last reporting period, Honeywell required security and cleaning contractors to use the platform and intends to significantly expand deployment over the next reporting period.

### **CLEANING**

Given the prevalent use of unskilled and migrant labour in cleaning, Honeywell requires that all newly on-boarded or renewed cleaning contractors must be members of and comply with the Cleaning Accountability Framework.

## **6. HOW WE ASSESS THE EFFECTIVENESS OF OUR ACTIONS**

### **AUDITS**

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

### **CORPORATE CITIZENSHIP REPORT**

Honeywell is committed to 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. The report highlights what has been achieved over the last year and the strengths Honeywell looks to build on going forward.

## **7. CONSULTATION**

Honeywell recognises the importance of taking a collaborative and cross-functional approach to modern slavery. Honeywell Australia consulted and collaborated with its key global supply chain stakeholders in preparing this statement.

## **8. OTHER RELEVANT INFORMATION**

### **SLAVERY AND HUMAN TRAFFICKING STATEMENT**

Our approach and commitment to human rights drives [Honeywell's 2022 Slavery and Human Trafficking Statement](#) to ensure that all aspects of our business are sustainable and built on a strong foundation of fairness, ethical behaviour and integrity.


### **OTHER ACTS**

Honeywell complies with its reporting and disclosure obligations under the United Kingdom Modern Slavery Act 2015 and the California Transparency in Supply Chains Act 2010.

## STATEMENT APPROVAL

This statement is made for the financial year ending 2021. The Statement has been approved by the Board of Directors of Honeywell Holdings Pty Ltd and Honeywell Limited on 29 June 2022.


### Honeywell Holdings Pty Ltd

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David Arthur Glover

### Honeywell Limited

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THE  
FUTURE  
IS  
WHAT  
WE  
MAKE IT

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**Honeywell**