

HONEYWELL NORWAY

TRANSPARENCY ACT

DUE DILIGENCE REPORT

1 JULY 2022 – 31 DECEMBER 2022

1. INTRODUCTION

Honeywell Norway is pleased to provide its Due Diligence Report in compliance with the Act relating to enterprises' transparency and work on fundamental human rights and decent working conditions ("Transparency Act").

2. REPORTING ENTITY

This joint Due Diligence Report is provided by and covers Honeywell AS (company number 923 821 570) and Honeywell Life Safety AS (company number 981 336 305) ("Honeywell Norway") as reporting entities under the Transparency Act.

3. CORPORATE STRUCTURE, OPERATIONS AND SUPPLY CHAIN

CORPORATE STRUCTURE

Honeywell AS and Honeywell Life Safety AS have their corporate seat and registered office at Solbråveien 23, 1383 ASKER, Norway. Honeywell AS holds 100% shares and all voting rights in Honeywell Life Safety AS. Honeywell AS has no other subsidiary undertakings. Honeywell Life Safety AS has no subsidiary undertakings. Honeywell Norway's ultimate parent company is Honeywell International Inc. ("Honeywell") which is headquartered in Charlotte, North Carolina.

OPERATIONS

Headquartered at 855 S. Mint Street, Charlotte, NC 28202, Honeywell operates in approximately 79 countries and employs approximately 97,000 employees. Approximately 200 employees are employed in Norway.

Honeywell is a global technology-driven industrial company that manages business operations through four business segments:

- Aerospace
- Performance Materials & Technologies
- Honeywell Building Technologies
- Safety & Productivity Solutions

Honeywell Norway provides products and services in all territories nationally and in the Nordic region, including Sweden, Denmark, Finland, and Iceland, through a network of four site

locations. Honeywell Norway operates in adherence with all of Honeywell’s relevant global policies, procedures, and guidance, and always acts with both a global and local mindset.

Honeywell AS	
Site locations	Solbråveien 23, 1383 Asker, Norway
Site operations	Project operational support and services
Average employee headcount FY22	77
Business segment	Honeywell Performance Materials & Technologies
Business unit	Honeywell Process Solutions
Products and services	Safety and automation systems
Business relations	Prime contractor and subcontractor in offshore oil and gas refineries, onshore industrial plants, pulp, and paper plants
Market	Nordics

Honeywell Life Safety AS	
Site locations	Syretarnet 27, 3048 Drammen, Norway Lønningveien 49 (3 rd floor), 5258 Blomsterdalen, Norway Otto Nielsens Veg 12, 7052 Trondheim, Norway
Average employee headcount FY22	126
Site operations	Project operational support, warehouse and distribution services
Business segment	Honeywell Building Technologies
Business unit	Honeywell Fire Safety
Products and services	Fire detection, Voice Alarm and Public Address (VAPA), and emergency lighting
Business relations	Sales and support services to system integrators
Market	Nordics

SUPPLY CHAIN

Honeywell Norway procures a variety of products and services, primarily electronic components, mechanical finished goods, and engineering services, from strategic suppliers predominantly located in Norway and other European countries.

4. HONEYWELL GOVERNANCE FRAMEWORK

Honeywell is committed to sustainability and responsible business conduct in everything we do across our global operations and supply chain. An important part of that commitment is safeguarding fundamental human rights, including labor rights and ensuring decent working conditions, which are key elements embedded in all of Honeywell’s business operations, subsidiaries and supply chain worldwide through our [Human Rights Policy](#), [Honeywell’s Code of Business Conduct](#), [Supplier Code of Business Conduct](#) and [Honeywell’s Sustainable Opportunity Policy](#).

These standards address a broad range of fundamental human rights, labor rights and workplace health and safety safeguards in our global operations and supply chain to ensure fairness, ethical behavior, dignity, and respect. Honeywell's policies are regularly reviewed and revised to ensure they remain current and appropriate.

These standards are endorsed by Honeywell's Chairman and Chief Executive Officer and reinforced through various internal and external communication channels. This commitment is assured through robust governance and risk management processes, which are designed and applied to identify, assess, and mitigate potential adverse social and environmental impacts of our operations and supply chain and to monitor adherence to Honeywell's core values.

HUMAN RIGHTS POLICY

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 Honeywell's Supplier Code of Business Conduct. Honeywell's commitment to Human Rights is grounded in international human rights principles that independent organizations have proposed, such as the United Nations Global Impact, the International Labor Organization's Declaration on fundamental Principles and Rights at Work, and all applicable laws of the jurisdictions where we operate. Key elements of the Human Rights Policy include Inclusion and Diversity, Workplace Respect, Freedom of Association, Safe and Healthy Workplace, Workplace Security, Work Hours and Wages, Forced Labor and Human Trafficking, Child Labor, and Rights of Local Communities and those who live and work there. Honeywell declares in the policy its intention to take appropriate action against employees, agents and suppliers who act in violation of the policy.

HONEYWELL'S CODE OF BUSINESS CONDUCT

Honeywell's Code of Business Conduct is a baseline set of requirements that defines how we treat employees, customers, suppliers, shareholders, and communities around the world. It also empowers employees to recognize and report Integrity and Compliance issues, and to contribute toward upholding a work environment where everyone is treated ethically and with respect. The Code specifically addresses our commitment in relation to respecting human rights and protecting workplace health, safety, and environment. Through close collaboration with risk area owners and subject matter experts, Honeywell's Integrity and Compliance team revises the Code of Business Conduct every year to ensure it remains up to date. The Code is translated into 30 languages.

HONEYWELL'S SUPPLIER CODE OF BUSINESS CONDUCT

Honeywell expects its supply chain to abide by its Supplier Code of Business Conduct which sets forth Honeywell's commitment to integrity and compliance within its global supply chain. It specifically incorporates the Human Rights Policy as well as the workplace health, safety, environment safeguards required under all applicable laws and regulations. All suppliers are required to adhere to the Supplier Code of Business Conduct and to ensure that these requirements are also met within their supply chain.

HEALTH, SAFETY & ENVIRONMENT

Honeywell's commitment to health, safety and the environment is outlined in our [Sustainable Opportunity Policy](#) and managed through the [Honeywell Health, Safety, Environment, Product Stewardship and Sustainability \(HSEPS\) Management System](#).

HSEPS Management System

The Honeywell HSEPS Management System is a comprehensive health, safety and environment (HSE) management system which integrates a common set of requirements for all Honeywell organizations, subsidiaries, and site locations worldwide. The Honeywell HSEPS Management System is designed, amongst other, to provide the Honeywell's business groups and global Honeywell facilities with a systematic framework for minimizing HSE risks and associated liabilities and to provide a framework for continuous improvement in risk management and ensuring conformity with applicable laws and stakeholder requirements. Accordingly, all Honeywell sites, including Honeywell Norway, have implemented an HSE Management System founded on common core principles and based on recognized third-party standards, including ISO 14001:2015 (the international standard that specifies requirements for an effective environmental management system) and ISO 45001 (which specifies requirements for an occupational health and safety management system), as well as industry best practices. One key element involves reporting HSE-related incidents such as injuries and environmental events via a comprehensive management system software solution. Areas in which specific operational controls are required are listed on our [website](#) and include safety, industrial hygiene, loss prevention, environment, health, product stewardship, transportation safety, process safety management, construction safety, and remediation.

Occupational Health & Safety

All Honeywell sites rely on comprehensive processes for assessments of hazards that could pose a risk to workers, including employees, contractors, and visitors. Based on these assessments, risk mitigation controls are identified, implemented, and monitored to help ensure effective worker protections remain in place.

5. ADDRESSING RISKS

SUPPLIER RISK MANAGEMENT

Honeywell believes responsible supply chain management is critical to upholding our commitment to integrity and compliance, mitigating financial risk, and acting as a good corporate citizen. Our Supplier Code of Conduct establishes our commitment to integrity and compliance in our global supply chain.

Our Integrated Supply Chain activities are managed by a global team of seasoned professionals with expertise in risk management, procurement, supply management, operations management, logistics, and supply chain performance optimization. Our management structure ensures we have the necessary expertise to support the broad scope of our supply chain operations.

Honeywell's Senior Vice President and Chief Supply Chain Officer has responsibility for procurement, supplier risk monitoring and mitigation, supplier social responsibility, and

supplier adherence to the Code of Conduct. The Senior Vice President and General Counsel has responsibility for ensuring legal compliance of suppliers, including setting standardized contract language to ensure compliance with legal and Honeywell requirements.

Adherence to Honeywell's Supplier Code of Business Conduct

Supplier adherence to Honeywell's Supplier Code of Business Conduct is monitored through:

- Established policies and processes to evaluate suppliers prior to selection; all new suppliers are assessed prior to contracting with Honeywell;
- Ongoing assessments through a risk-based due diligence program that prioritizes suppliers in high-risk geographies or industries;
- Audits performed by a qualified third party using a standardized assessment that incorporates the requirements of our Supplier Code; this process includes conducting thorough onsite audits and preparing detailed audit reports, and;
- Corrective action plans required for any gaps identified in audit results that are assigned an owner who consistently monitors progress against agreed upon timelines with the expectation that nonconformance items will be fully resolved; significant findings may lead to the immediate removal of a supplier from Honeywell's approved supplier list.

Supplier contractual assurances

Supplier adherence to Honeywell's Supplier Code of Business Conduct, including the Human Rights Policy referenced therein, is a key consideration when we make sourcing decisions. The requirement to comply with the Supplier Code of Business Conduct is incorporated as part of Honeywell's standard sourcing terms. Honeywell's Supplier Code of Business Conduct requires suppliers to adopt and implement a management system to ensure compliance with 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.

WHISTLEBLOWER PROGRAM

Honeywell has an integrity and compliance helpline which 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, of any human rights violations or concerns. Honeywell treats all reports confidentially to the extent possible, consistent with the law, company policy, and the requirements necessary to conduct an effective investigation. All reports are investigated promptly and thoroughly, consistent with applicable law. Honeywell will not tolerate any form of retaliation against anyone for making a good faith report of actual or potential misconduct. Honeywell responds to 100% of reported allegations.

HUMAN RIGHTS PROGRAM

Honeywell has conducted a global human rights impact assessment in 2022 in consultation with an industry-leading firm. The scope of the assessment covered Honeywell's global operations and upstream supply chain at the Honeywell enterprise level.

The assessment identified opportunities for Honeywell to best meet the leading international standards of a best-in-class program. Honeywell is committed to action upon the identified opportunities, which include performing additional training, extend additional awareness communications to employees and suppliers and enhance Honeywell's Enterprise Risk

Management process to include specific considerations regarding human rights risks. The assessment also directed Honeywell to identify the predominant salient human rights impact topics and to prioritize those impact topics based on relevancy, severity and likelihood. Impact topics include but are not limited to working conditions, health & safety and material sourcing.

LABOR RELATIONS AND STAKEHOLDER ENGAGEMENT

Collective Labor Relations

Both Honeywell Life Safety AS and Honeywell AS are members of the Confederation for Norwegian Enterprise (NHO). Honeywell Life Safety AS belongs to the national association Nelfo and the industry association Integra Industry. It is bound by the National Convention for Electrical Trades (LANDSOVERENSKOMSTEN FOR ELEKTROFAGENE). Honeywell AS belongs to the national association Federation of Norwegian Industries (Norsk Industri) and the industry association Electrical and Energy. It is bound by the NITO agreement. On top of these national collective labor agreements, negotiations with EL & IT and Fellesforbundet happen on local level. The collective labor agreements that cover Honeywell employees in Norway provide for high standards in areas like remuneration, working time, vacation, pension and benefits. Honeywell is committed to ensure full compliance with all these.

Statutory protection for employees

Labor laws and regulations in Norway stipulate a high level of protection for employees. Honeywell is constantly monitoring and evaluating its obligations arising from those regulations to ensure its full compliance. It is our priority to ensure that all employees work in a workplace environment that is safe and sound. We endeavor to assess possible hazards in the workplace and implement measures to eliminate or reduce the risks of workers being sick or injured at work. We conduct occupational health checks in cases where this is legally required. Full labor law compliance is also observed in other areas of labor law.

Stakeholder engagement

In addition to the global human rights impact assessment, we have engaged with regional stakeholders as an effective way to determine relevance and impact of human rights issues on the regional and local site level of Honeywell Norway. While, during the reporting period covered by this Due Diligence Report, no actual adverse impacts or significant risks were observed on that regional level, Honeywell Norway will continue to work with regional stakeholder and its business relations in addressing salient human right issues relevant to the region.

FOSTERING WORKPLACE RESPECT, DIVERSITY AND INCLUSION

Honeywell respects and values the diversity reflected in our various backgrounds, experiences and ideas. Together, we provide an inclusive work environment that fosters respect for all of our coworkers, clients and business partners. Inclusion and Diversity is a foundational principle at Honeywell, both because it's the right thing to do and because it is a fundamental enabler for our business. We actively recruit, develop and retain talent from diverse backgrounds and cultures who bring different experience, perspectives, abilities and ideas. We foster an inclusive environment in which all employees feel valued, respected and accepted. In the area of diversity, we have set up various employee networks (such as a women's employee network, networks for employees with disabilities, black employees, Hispanic employees, LGBTQ+ employees). Our employee networks are open to all employees. Through our networks, we foster collaboration and belonging, enabling everyone to share and

learn from one another and fully contribute at work and in the community in an inclusive and supportive environment.

TRAINING AND COMMUNICATIONS

Honeywell provides comprehensive training on key compliance topics, and training scenarios in over 20 languages. All Honeywell employees are required to complete periodic training on Honeywell's Code of Business Conduct and policies and, where permitted by law, to certify each year their compliance with the Honeywell Code of Business Conduct and that they have reported any concerns regarding potential violations. In 2022, Honeywell received certifications from 100% of officers and eligible employees were permitted by law. Additionally, human rights communications are facilitated throughout the company and dedicated human trafficking online training is offered to all employees as needed.


6. CONSULTATION

We recognize the importance of taking a collaborative and cross-functional approach to safeguard fundamental human rights and a safe and healthy work environment. In preparing this Due Diligence Report, Honeywell Norway consulted and collaborated with Honeywell's key global and regional functions, including Integrated Supply Chain, Sourcing, Human Resources, Legal, Integrity & Compliance, Controllershship and Health, Safety & Environment.

7. STATEMENT APPROVAL


This Due Diligence Report is made for the reporting period from 1 July 2022 to 31 December 2022. The report has been approved by the Board of Directors of Honeywell AS and Honeywell Life Safety AS on May 26, 2023.

Honeywell AS

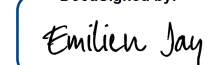
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**THE
FUTURE
IS
WHAT
WE
MAKE IT**

Honeywell