

## **Honeywell: Our approach to UK taxation**

Honeywell's business is underpinned by its values with a focus on integrity and compliance as set out in the Code of Business Conduct. The Code forms the foundation of how the group manages its tax affairs.

Honeywell's group tax policy states that Honeywell shall comply with all applicable tax laws and pay all taxes properly due. The Vice President - Taxes has ultimate responsibility for compliance with all applicable tax laws in all jurisdictions in which the group operates.

As a publicly listed group, tax matters are ultimately overseen at the Honeywell Board level. The group does not have a prescriptive level of tax risk appetite but considers risk on a case by case basis.

In respect of the UK, the group aims to fully comply with its statutory tax obligations in respect of UK taxation, and in doing so seeks to identify and manage the tax risks arising from its UK operations.

To achieve this, the group aims to employ suitably qualified and experienced staff covering all aspects of UK taxation, and also utilizes the services of external tax advisors. The key role of the staff employed is not only to ensure tax obligations are fulfilled, but to address the tax implications of changes to the UK group and its operations. External consultants assist with the preparation of corporation tax returns for all UK entities.

The group participates in tax planning to the extent it is in line with Honeywell's commercial objectives and strategies. In all cases the group seeks to remain fully compliant with the law. External tax advice is sought where the law or its application is unclear in order to ensure this objective is met.

The group has an honest and cooperative attitude towards its dealings with HMRC and expects a two-way regular dialogue facilitating a professional working relationship with the team responsible for Honeywell's UK tax affairs.

We regard this publication as complying with the duty to publish our tax strategy in respect of UK taxation under Schedule 19 of the UK Finance Act 2016 for the financial year ended 31 December 2018.