



# HONDA

CODE OF CONDUCT

NORTH AMERICAN REGION COMPLIANCE & ETHICS POLICY



Honda is Committed to Being a Company that Society Wants to Exist



# HONDA

## Message



Toshihiro Mibe

President, CEO &  
Representative Director

A stylized, handwritten signature of Toshihiro Mibe in dark ink.

Since its foundation, Honda has strived to become a company society wants to exist by sharing joys with people around the world based on the concepts of “Respect for the Individual” and “The Three Joys,” which are the Fundamental Beliefs of Honda. Honda is now capable of offering value to many customers all around the world through a variety of products in our motorcycle, automobile and Life Creation business areas. I believe that this growth as a company was possible because we have always interacted with our customers and society with sincerity and integrity.

In 2016, we formulated the “Honda Code of Conduct” which outlines the sincere conduct that all of us who work at Global Honda must practice. I believe that all Honda associates understand and practice the “Honda Code of Conduct” in your daily work and conduct.

Today, the environment surrounding Honda business is undergoing a period of major transformation, and further efforts to address environmental and safety challenges are becoming urgent needs. Honda must continue fulfilling the expectations of society in a timely manner. Moreover, looking toward the future, we will continue offering new value to our customers by fully leveraging the strength of Honda, our originality, and taking on challenges in new areas such as the skies, ocean, outer space and the area of robotics.

In the pursuit of these goals, it is essential for us to always be sincere and ethical toward our customers and society. No matter how capable we are to offer excellent products and services, we cannot gain the trust and empathy of our customers and society or hope for further growth unless we conduct ourselves with such sincerity and strong ethics.

Regardless of business conditions, we will always maintain sincerity and integrity toward our customers and society, and that is the origin and the immutable belief that is serving as a backbone of Honda.

Please continue to have clear awareness that the behaviors and actions of each one of us represent Honda and conduct yourself with sincerity and integrity in accordance with the “Honda Code of Conduct.”



## Introduction

Under the guidance of the Honda Philosophy and as a company empowered by its aspiration to realize people's dreams, Honda has thus far been able to establish trust with its customers and society by engaging in global business operations and sharing joy with people around the world.

As a result of our global deployment, Honda now has associates in numerous countries and regions around the world. Considered conduct grounded on the Honda Philosophy on the part of each individual associate is essential for Honda in reinforcing the trust established with our customers and society. By sincere, we mean free from deceit and hypocrisy and being earnest.

Recently, we have established the Honda Code of Conduct as sincere actions that we would like all persons working at Honda around the world to follow.

To reinforce the trust of customers and society and make Honda "a company society wants to exist," all associates including officers and directors of Honda and its subsidiaries (hereinafter referred to as "associates") (where HM and its subsidiaries are collectively called as the "Honda Group") should fully understand and comply with the Honda Code of Conduct, and practice sincere and ethical conduct that conforms to the Code.

Acts in violation of the Code may be subject to discipline under company policies and applicable laws and regulations.

## Responsibilities of the Management

As a member of the management, you should serve as a role model and carry out work under high ethical standards to foster a sincere and ethical corporate culture.

You should also strive to foster an organizational culture in which your associates put the Honda Code of Conduct into practice and are able to report or consult any concerns without fear of retaliation.

In cases where violations or possible violations of the Code are found, you must not neglect the situation. Instead, you should respond appropriately by taking actions such as reporting to the legal department or compliance & ethics contact line.

## Scope of Application

The Honda Code of Conduct applies to associates of the Honda Group.

Honda also advocates adherence to the Code on the part of its affiliates.

## Relationships with Customers

### Quality of Products and Services

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#### Honda's policy

Honda strives to provide products and services that exceed the expectations of customers and society. In this sense, it is essential to place the highest priority on quality and safety, voluntarily establish high standards, and respond in an appropriate manner.

#### Required conduct

I will place the highest priority on the quality and safety of products as well as services, and comply with established standards and procedures. I will also request business partners and distributors/dealers to adhere to Honda's standards and procedures.



### Appropriate Advertising and Publicity

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#### Honda's policy

Honda engages in advertising, publicity, and sales promotion activities in good faith so as to constantly meet the trust and expectations of customers and society.

#### Required conduct

I will properly engage in product advertising, publicity, and sales promotion activities to avoid misleading customers.

### Compliance with Competition Laws

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#### Honda's policy

Honda will engage in free and open competition with competitors to maintain its stance as a company trusted by customers and society.

#### Required conduct

I will comply with competition laws (antitrust laws).

## Relationships with Business Partners

### Sound Business Practices

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#### Honda's policy

Honda will engage in sound business practices under an environment of free and open competition which is built upon mutual trust with suppliers, distributors/dealers, subcontractors and all other business partners, while aiming to build long-term, constructive relationships with them.

#### Required conduct

I will comply with the following in order to maintain sound relationships with business partners:

- I will carry out appropriate procedures in accordance with company policies in selecting business partners, and will comply with laws, regulations, and company policies related to business transactions.
- I will not receive from or provide to business partners benefits in the form of goods (both monetary and non-monetary) or entertainment beyond what is generally considered appropriate by society. I will also not use my position or authority to receive improper benefits from interested parties.

## Relationships with Colleagues / Work Environment

### Communication in the Workplace

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#### Honda's policy

Honda strives to create workplaces in which co-workers can trust one another at all times.

#### Required conduct

I will strive for smooth communication in the workplace to create a harmonious work environment.

### Respect of Human Rights

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#### Honda's policy

Honda strives to maintain its stance as a company committed to practicing fairness and sincerity and respects human rights.

#### Required conduct

I will respect fellow associates, interact with them in a sincere and appropriate manner, and never engage in any form of harassment or unjust, discriminatory behavior in the workplace.

### Safety and Health

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#### Honda's policy

Honda will provide a safe and healthy workplace to maintain a pleasant and safe work environment.

#### Required conduct

I will comply with laws, regulations and company policies related to safety and health, strive to maintain a safe and healthy workplace, as well as prevent and minimize accidents.





## Relationships with Honda (Company Assets)

### Company Assets

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#### Honda's policy

Honda will appropriately maintain and manage all company assets, both tangible and intangible, as enterprise resources to achieve its business objectives.

#### Required conduct

I will appropriately handle company assets and not engage in acts that damage the value of company assets.

I will appropriately handle facilities, equipment, tools, products, parts, accessories, items supplied by the company, money, intellectual property, and all other company assets in compliance with company policies and not use them for anything other than for achieving Honda's business objectives.

### Management of Information

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#### Honda's policy

Honda will appropriately protect and manage confidential information and personal information that it holds for the purpose of conducting proper business operations.

#### Required conduct

I will appropriately handle confidential information such as internal information, business partner information and personal information of customers and other associates in compliance with laws, regulations, and company policies. I must also refrain from illegitimate use of such information for insider trading or other improper deeds.

### Conflicts of Interest

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#### Honda's policy

As a measure to ensure appropriate business operations, Honda prohibits any conduct by associates that conflict with the interests of Honda.

#### Required conduct

I will not engage in acts that conflict with the interests of Honda for my own benefit or the benefit of business partners or third parties.

## Relationships with Society

### Traffic Safety

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#### Honda's policy

Honda will develop advanced safety technologies and engage in activities to promote safe driving with the aim of realizing a safer motorized society.

#### Individual conduct

I will observe traffic rules, good driving etiquette and endeavor to drive safely.

### Environmental Protection

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#### Honda's policy

Honda actively endeavors to protect the global environment throughout all business activities as a responsible member of society.

#### Required conduct

I will comply with laws and regulations, company policies, and internal standards related to environmental protection and strive to reduce the burden on the environment by engaging in resource conservation, energy conservation, and recycling.

### Contribution to Society

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#### Honda's policy

Honda strives to contribute to society through its business activities, such as the provision of products and services that exceed the expectations of customers and society. Honda also engages in socially beneficial activities to fulfill its social responsibility as a corporate citizen.

#### Required conduct

I will fully acknowledge Honda's basic stance to contribute to society and strive to fulfill our expected roles in the community.



## Relationships with Political and Administrative Entities

### Relationships with Political and Administrative Entities

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#### Honda's policy

As an independent corporate entity, Honda maintains appropriate relationships with political entities (political organizations and politicians) and administrative entities (governmental agencies and government officials).

#### Required conduct

I will interact with political and administrative entities in an appropriate manner in compliance with laws, regulations, and company policies and will not offer politicians or government officials entertainment nor gifts (both monetary and non-monetary) that are prohibited by laws, regulations, and company policies.



## Relationships with Shareholders, Investors, and Other Stakeholders

### Timely and Appropriate Disclosure of Information

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#### Honda's policy

In order to remain a highly transparent company, Honda strives for appropriate communication with customers, business partners, shareholders and investors, local communities, and other stakeholders.

#### Required conduct

I will appropriately disclose information in compliance with laws, regulations, and company policies when engaging in disclosure of information to outside parties and interact with stakeholders in a courteous manner.



# Compliance and Reporting Non-compliance Incidents

## Compliance and Ethics

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### Honda's policy

Honda continuously carries out initiatives to strengthen compliance in order to reinforce the trust established with society. Persons who work at Honda are also required to comply with relevant laws, regulations, and policies while acting ethically.

### Required conduct

I will comply with laws, regulations and company policies.

I will act ethically in accordance with social norms and common sense.

## Reporting Non-compliance Incidents

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### Required conduct

If I become aware of any violation or possible violation of laws, regulations or company policies, report the matter, I will submit suggestions, and consult as necessary with my manager, the legal department, or the compliance & ethics contact line\*.

\*This includes the internal whistleblower hotlines established by the group companies.





# NORTH AMERICAN REGION COMPLIANCE & ETHICS POLICY

Powering the Future with Integrity



**HONDA**  
The Power of Dreams

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# Message From the President



Noriya Kaihara  
**Chief Officer of North American  
Regional Operations**  
**President & CEO of  
American Honda Motor Co., Inc.**

A handwritten signature in black ink, appearing to read 'Noriya Kaihara', written over a light blue rectangular background.

Honda is a unique company where every associate has the opportunity to make a real contribution to the lives of our customers, to the communities where we live and work and to the success of the company.

Our success together is what makes possible our corporate goal to be a company that society wants to exist. This great expectation carries with it the responsibility for all of us to meet the highest level of ethical standards.

I am proud to share this *North American Compliance & Ethics Policy*, which provides consistent guidance to help you make the best decisions and take the right actions in pursuit of our business objectives. This is what will enable us to conduct our business in the right way with our customers, business partners and colleagues.

I want to emphasize the personal role we all play in ensuring compliance and ethical behavior.

The Honda Philosophy forms the basis for all company activities and sets the standard for the decision-making process and conduct of Honda associates. Our Compliance & Ethics Policy sets the guidelines that help us achieve our high goals in a manner consistent with our Philosophy. Based on this foundation, it is your role and the actions you take each day that help create an ethical workplace for all associates.

If you find yourself in a situation where you are unsure of the correct course of action, or you observe what you believe to be a violation of a company policy, it is your responsibility to come forward and ask questions or report the concern. Only if we know of issues or concerns can we address them. There are many channels available to you to raise such a concern, including your management team, Human Resources/Associate Relations, Compliance & Ethics, and the AHM Law Division.

I believe the quality and diversity of our associates and our commitment to the strongest business ethics are the key to our success today, as well as our ability to thrive and excel in the future. Working together and maintaining high ethical standards, we will help customers expand their life's potential, as Honda associates fulfill their own.

Thank you for your commitment. Let's work together to create a strong future for Honda.

Sincerely,  
Noriya Kaihara



# Message From the North American Region Compliance Officer



Cathy McEvilly

Senior Vice President and  
North American Region  
Compliance Officer

*Catherine M. McEvilly*

Dear associate:

At Honda, we hold ourselves to very high standards. Our reputation and long-term success depends upon each associate maintaining the highest degree of integrity. As we rise to meet any and all challenges before us, we must never compromise our ethical standards. It is important to preserve the trust of our customers, suppliers, fellow associates and everyone else on whom our business depends. Each of us is responsible for conducting Honda's business with the highest standards of ethical conduct and in compliance with applicable laws and Honda policies. For Honda, high standards are nothing new. It is who we are.

Honda periodically issues the Global **Honda Code of Conduct** and the **North American Region Compliance & Ethics Policy** to make sure that you are aware of Honda's expectations that you comply with Honda's policies and legal requirements. These policies take into account the evolving business climate, reflect Honda's values and expectations, provide guidance on a variety of topics and highlight your responsibilities.

Please read and understand these policies and refer to them as often as needed to help ensure your day-to-day actions and decisions proudly reflect Honda's values.

In this policy update, most sections have at least some minor enhancements and, one section, Customs and International Trade, has more significant enhancements.

In the coming weeks, an all-new North American Region Compliance & Ethics Training will be launched to support the release of this revised policy. If you have any questions or concerns after you read the policy, you may ask your supervisor, Human Resources/Associate Relations or Compliance & Ethics (C&E).

We believe Honda is among the finest companies in the world and, ultimately, Honda's long-term success depends upon each associate's judgment and the decisions made by each of us.

Sincerely,  
Cathy McEvilly

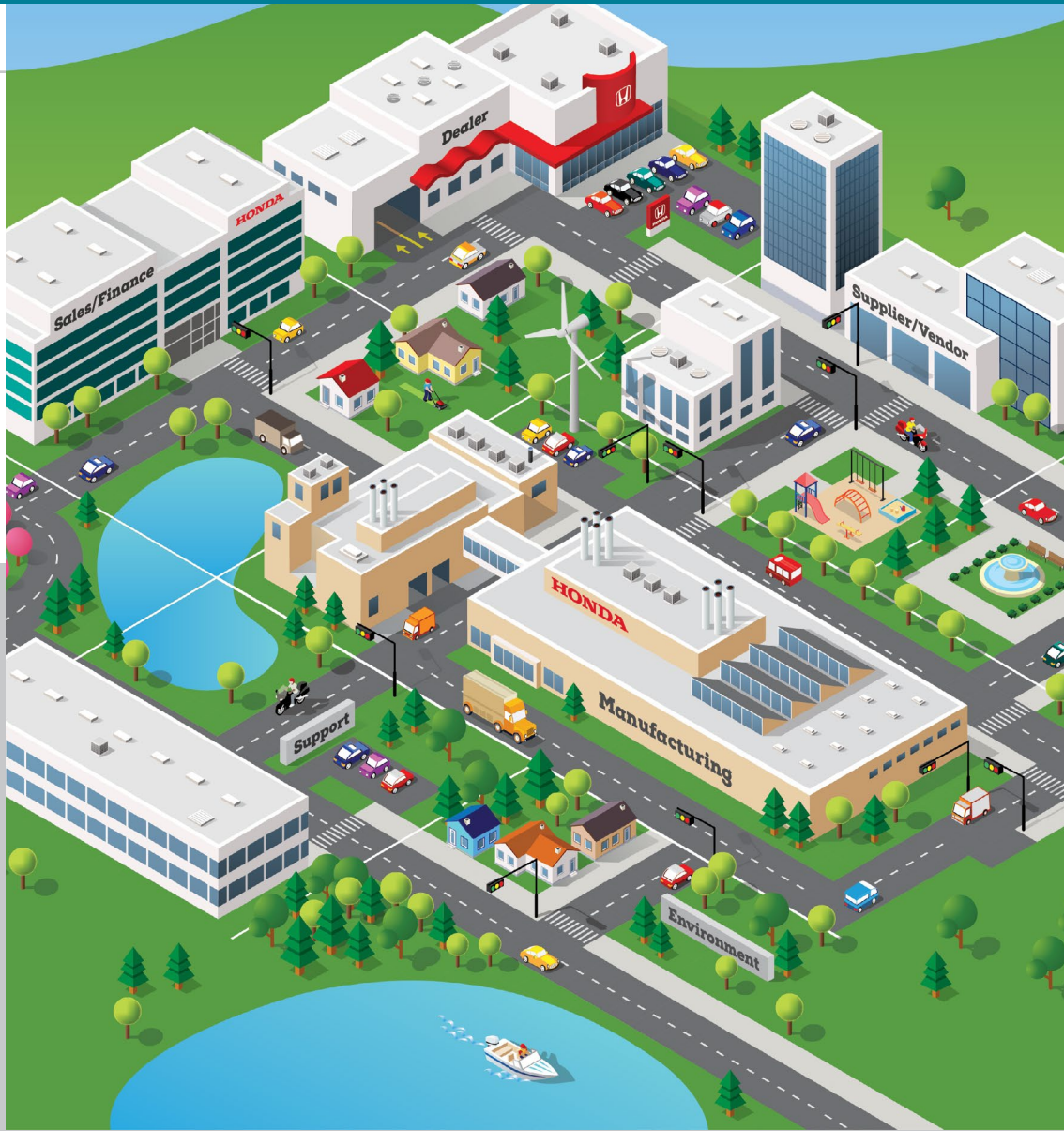


# Introduction

## The Honda Philosophy

Guided by the Honda Philosophy, Honda has expanded its business globally based on the pursuit of new dreams and the determination to make them come true. Through these efforts, we have shared the “joys” and established trust with customers and society around the world. To further advance our business, every Honda associate must share the core values of the Honda Philosophy: Dreams, Joy, Challenging Spirit, Passion, and Respect. With each of us sharing these values, we will be able to further gain the trust of our customers and society, helping Honda strengthen its position as “a company that society wants to exist.”

From the beginning, the Honda Philosophy has emphasized the obligations we have to our customers, business partners, society, and to each other. We will always conduct business lawfully and honestly. Safety, quality, integrity and respect aren't just words at Honda—they are the way we work together and the foundation of our legacy of integrity.



For us, our Philosophy has always been more than just lofty thoughts and words. It has always been the foundation for actions and decisions. For that reason, the Honda Philosophy goes hand-in-hand with our North American Compliance & Ethics Policy. The two are closely inter-related. Our Philosophy provides the foundational ideas and principles that distinguish us as a company. Our Philosophy also expresses our vision, ideals, and what we aspire to be. Our North American Compliance & Ethics Policy is an extension of that Philosophy and a commitment that we will conduct business the right way.

## To Whom This Policy Applies

This Policy applies to all Honda associates, including officers and directors, at all Honda locations within North America. This Policy also applies when you are traveling or on assignment outside of North America.

Business partners (such as contractors, suppliers, vendors, service providers, dealers) and contingent workers should understand that Honda associates must conduct business in accordance with this Policy and conduct by any business partner that violates Honda's standards of compliance and ethics might result in the need to sever our business relationship with that person or entity.

## Using This Policy

This *North American Compliance & Ethics Policy* is a guide to the ethical and legal responsibilities of Honda associates. This Policy is not a comprehensive rulebook, and many of the responsibilities and expectations included here may also be discussed in other Honda materials (for example, the Associate Handbook, *Global Confidentiality Policy*, *Anti-Corruption and Anti-Money Laundering Policy*, *Antitrust and Competition Law Compliance Policy*, procurement policies, and applicable business unit or department policies and procedures). This Policy is not intended to be a substitute for any of those more specific policies. Additionally, this Policy must be read in conjunction with the global *Honda Code of Conduct*.

This Policy references many laws and regulations as well as many Honda standards that go beyond legal minimums. This is obviously not an exhaustive list. Contact [AHM Law or your local company's legal group](#) if you find yourself in a situation where you are unsure of your responsibilities under the law.



## Our Responsibilities

The words in this Policy are empty promises if they are not practiced by each of us and enforced consistently throughout the Company. Since prevention is the best way to minimize problems associated with unethical or illegal conduct, Honda provides periodic training on ethical and legal responsibilities. Honda also may evaluate an associate's adherence to this Policy during the annual performance appraisal process.

We recognize that sometimes people make mistakes. If you make a mistake, promptly disclose the error to your leadership. Covering up a mistake only makes the situation worse and is a serious violation of Honda policy.

Each of us, regardless of where we may be assigned to work, has the responsibility to always act and make decisions consistent with this Policy, the Honda Philosophy, and Honda's core values.

In addition, you, and all associates, must:

- **Understand the information in this Policy and other Honda policies, paying particular attention to the topics that pertain to your job responsibilities.**

- **Complete all required associate training in a timely manner and keep up-to-date on current standards, practices, and expectations.**
- **Report any conduct that may violate the law or this Policy to your manager, senior management, Human Resources/Associate Relations, Compliance & Ethics, or AHM Law and/or your local company's legal group. If you have already reported your concern through internal channels, and/or you believe the concern should be reported to the regional level, you may contact the Corporate Compliance & Ethics Office at AHM or AHM Law and/or your local company's legal group. Contact numbers can be found at the back of this Policy under North American Compliance & Ethics Contact Information. You may remain anonymous when reporting a concern.**
- **Cooperate and tell the whole truth when responding to an investigation or audit and never alter, delete, or destroy records in response to an investigation or when an investigation is anticipated, or when they are on litigation hold.**

**Remember, no reason, including the desire, or pressure to meet business goals, should ever be an excuse for violating laws, regulations or Honda policies.**

## Additional Responsibilities of Honda's Leadership

Every Honda leader is expected to follow our management policies, which are rooted in the Honda Philosophy:

- **Proceed always with ambition and youthfulness.**
- **Respect sound theory, develop fresh ideas and make the most effective use of time.**
- **Enjoy work and encourage open communications.**
- **Strive constantly for a harmonious flow of work.**
- **Be ever mindful of the value of research and endeavor.**

Leaders must also:

- **Lead by example. Leaders are expected to exemplify the highest standards of ethical business conduct.**
- **Be proactive. Look for opportunities to discuss and address ethics and challenging situations with others.**
- **Make sure any business partner with whom they work understand their compliance and ethics obligations under Honda's policies.**

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**Q:** I'm a manager. If I observe misconduct in an area not under my supervision, am I still required to report the issue?

**A:** Although you are primarily responsible for associates and business partners with whom you work, all Honda associates are required to report any misconduct they become aware of and, as a leader, you are especially obligated to take action. The best approach is to talk first with the associate who oversees the area where the problem is occurring; if this doesn't work, or isn't practical, you should contact the other resources listed in this Policy.

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## Accountability and Discipline

Violating relevant laws, regulations or Honda policies, or encouraging others to do so, may expose the Company to liability and puts Honda's reputation at risk. If an ethics or compliance problem does occur, you are required to report it so it can be addressed appropriately. Meeting these requirements is vital to Honda's success. Therefore, violations of our policies, or the law, may result in discipline, up to and including separation/termination of employment. You should also understand that violations of laws or regulations may result in legal proceedings and penalties against you including, in some circumstances, criminal prosecution.

Disciplinary action may be taken when:

- **An associate authorizes or participates in conduct that violates this Policy;**
- **An associate has deliberately failed to report violations of this Policy, concealed violation(s) of this Policy, or deliberately withheld or encouraged others to withhold relevant information concerning a violation of this Policy;**
- **A person violates this Policy, and the manager could have prevented, discovered, or stopped the violation, and/or mitigated its impact with more effective supervision;**
- **Any manager, or associate, retaliates, directly or indirectly, or encourages others to do so, against anyone who reports a suspected violation of this Policy; and**
- **Anyone makes a report they know to be false or fails to cooperate in a formal investigation.**



# You and Your Fellow Associates

## Respect for the Individual

We owe each other honesty, respect and fair treatment and we need to always treat others as we would want to be treated. This is the basis of our commitment to one another and is the foundation of our success. To maintain our commitment and to attract and keep talented individuals, it is vital that we continue to have a supportive, professional, diverse and respectful work environment.

Maintaining this environment not only helps Honda succeed, it also creates the setting for each of us to thrive and to reach our full potential. At Honda we demonstrate Respect for the Individual in many ways. What follows are some of the key areas where we must be guided by our commitment to our values and to each other.

## Trust

Relationships among our associates should be based on mutual trust. Trust is created by repeatedly recognizing each other as individuals, helping out, and accepting help when appropriate,



sharing our knowledge, and making a sincere effort to fulfill our responsibilities.

### *Initiative*

Initiative means not being bound by preconceived ideas, but thinking creatively and acting on your own initiative and judgment, while understanding that you must take responsibility for the results of those decisions and actions.

### *Equality*

Equality means recognizing and respecting individual differences in one another and treating each other fairly. We are committed to fostering an accepting and inclusive work environment and to creating equal opportunities for each individual to enjoy a work environment free from all forms of discrimination.

### **Diversity and Non-Discrimination**

Inclusion and diversity are fundamental strengths of Honda's corporate culture of Respect for the Individual. An inclusive work environment brings together a wide variety of working and thinking styles, backgrounds, skills, and cultural experiences that enable us to meet the needs and expectations of an increasingly diverse global customer base. **Inclusion also makes every workplace welcoming and safe for Honda's associates, contingent associates, contractors, suppliers and dealers.**

Our colleagues, job applicants, and business partners are entitled to respect regardless of race, color, national origin, ancestry, sex, sexual orientation, gender identity or expression, religion, age, pregnancy, disability, military status, genetic information, marital status, any factor the law protects from employment discrimination, or any other factor that influences an individual's working or thinking style.

#### **Make sure you:**

- **Treat others respectfully and professionally.**
- **Promote diversity in hiring and other job-related decisions.**
- **Do not discriminate against others on any basis protected by law or Honda policy.**

#### **Watch out for:**

- **Comments, jokes or materials, including emails, which others might consider offensive. Materials of such kind should never be shared or sent.**
- **Inappropriate bias when judging others. If you supervise others, judge them on performance. Avoid introducing unrelated considerations into your decisions. Use objective, quantifiable standards.**

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**Q:** How does Honda benefit from diversity?

**A:** Diversity is important at Honda because each associate has a unique experience and perspective that can strengthen our organization and create a more productive workplace. Inclusion is important because each associate wants to feel valued and important. When associates feel included, it fosters commitment to our company's goals and motivates us to contribute to our success.

**Q:** One of my co-workers sends emails containing jokes and insulting comments about certain nationalities. They make me uncomfortable, but no one else has spoken up about them. What should I do?

**A:** You should notify your manager, Human Resources/ Associate Relations or Compliance & Ethics. Sending such jokes violates our values as well as our policies and may expose Honda to other risks. By doing nothing, you are condoning inappropriate behavior and tolerating beliefs that can seriously erode the team environment that we have all worked to create.

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## Harassment-Free Workplace

Harassment, intimidation, and abuse are prohibited at Honda. It doesn't matter if you are an associate, contingent, or business partner, harassment violates Honda's belief in Respect for the Individual. We must protect the right of everyone to work in a harassment-free environment.

Harassment can take many forms, all of them unacceptable. Some examples are:

- **Jokes, insults, threats and other unwelcome actions and/or comments concerning a person's race, color, sex, gender identity and expression, sexual orientation, age, religion, national origin, disability, military status, educational background, or economic status;**
- **Unwelcome sexual advances, requests for sexual favors, and other unwelcome verbal or physical conduct of a sexual nature;**
- **Conduct that disrupts another's work performance, or creates an intimidating or hostile work environment; and**
- **Nonverbal conduct, such as staring, leering, or giving inappropriate gifts.**



Honda's expectations:

- **Help each other by speaking out when a co-worker's conduct makes you/others uncomfortable;**
- **Do not engage in sexual harassment, including requests for sexual favors or other unwelcome verbal or physical conduct of a sexual nature. This is strictly prohibited;**
- **Demonstrate professionalism, including reliability, honesty, and integrity;**
- **Do not visit inappropriate internet sites or display sexually explicit or offensive pictures; and**
- **Report all incidents of harassment, intimidation, and abuse.**

If you observe, or are the subject of harassment, intimidation, or abuse, ask the offending person to stop and tell her or him that the conduct is unwelcome. Regardless of whether or not you discuss the problem with the offending person, you must also promptly report the incident to your manager, Human Resources/ Associate Relations or contact Compliance & Ethics. Retaliation against anyone who objects to, or reports unwelcome conduct, is strictly prohibited.

Honda utilizes the support of consultants, service providers, and suppliers for various business activities.

We also utilize contingent workers to support the variable volume of work required by our business. All of these workers are to be treated with respect and they deserve a harassment-free environment. They must also follow Honda's established safety procedures and follow Honda's non-harassment policy. Honda will not tolerate illegal actions conducted by anyone while doing business with Honda or on Honda's behalf.

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**Q:** While on a business trip, a colleague of mine repeatedly asked me out for drinks and made comments about my appearance that made me uncomfortable. I asked him to stop, but he wouldn't. We weren't on site and it was 'after hours' so I wasn't sure what I should do. Is it harassment?

**A:** This type of conduct is strictly prohibited, not only during working hours, but in all work-related situations including business trips. Honda's policy against harassment does not just apply on Honda premises or during work hours. It applies in all work settings at all times - even when you are off-site, on a business trip, or at a company-sponsored event. In the example above, even if you've asked your colleague to stop, you need to report the problem.

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**Q:** My new manager is very intimidating and sometimes she humiliates me in front of my co-workers. This may just be her style, but it's affecting my morale. Is there anything I can do?

**A:** If you feel you are not being treated in a professional manner, speak to your manager about how her behavior is affecting you. If you are not comfortable doing that you can speak to another manager, or you can go to Human Resources/Associate Relations or contact Compliance & Ethics.

**Q:** A coworker often jokes about my ability to use the tools provided for my job, but doesn't make the same jokes to my male counterparts. I do not want to be treated differently if I report it. Should I just ignore him?

**A:** If you feel you are being treated differently by your co-worker, talk to them about how their behavior is affecting you. If you are not comfortable talking directly to your co-worker then you can speak to your manager, or you can go to Human Resources/Associate Relations or contact Compliance & Ethics.

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## Safe, Secure, and Healthy Work Environment

Honda is committed to providing a safe, secure and healthy work environment. We have an obligation to ourselves and each associate to ensure safe, secure and healthy working conditions. You must participate in safety training when required and always comply with all relevant safety codes, regulations, standards and policies. Promptly report any safety concerns including accidents, injuries, or unsafe conditions. Make safety a priority in everything you do.

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**Q:** Are subcontractors expected to follow the same safety policies and procedures as associates?

**A:** Absolutely. Managers are responsible for ensuring that all business partners working on Honda projects both inside and outside the premises understand and comply with all applicable laws and regulations governing the particular facility, as well as with additional requirements the Company may impose.

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## Alcohol and Drug Use

Possessing or using alcohol or illegal drugs at work, or working while under the influence, is strictly prohibited. It is dangerous to you and an obvious threat to a safe workplace. For additional information, consult your individual company's policy in this area.

## Preventing Workplace Violence

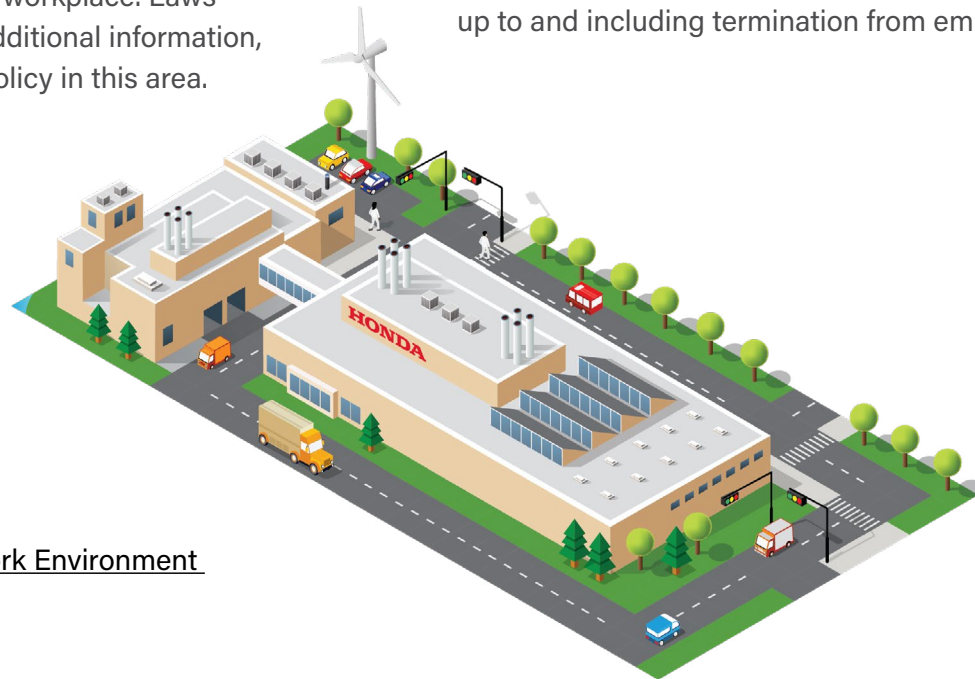
Violence, intimidation, and direct or implied threats of violence are strictly prohibited at Honda. We all have a duty to promptly report any workplace threat, activity or incident that you reasonably believe violates this Policy.

In addition, weapons, including firearms, or related paraphernalia are not allowed in the workplace. Laws may vary by state or province. For additional information, consult your individual company's policy in this area.

## Timekeeping

Honda is committed to paying associates fairly and in compliance with all relevant laws. You are accountable to accurately record the time you work and to follow company timekeeping policies (such as meals and breaks, overtime, etc.). Managers are responsible for ensuring that associates follow timekeeping policies and requirements. Accurate time reporting is necessary to appropriately calculate your pay and benefits. If you have reason to believe your pay is inaccurate or incorrect, then it is your responsibility to inform your manager or Human Resources/Associate Relations as soon as possible.

Any falsification or attempt to misrepresent hours worked is a violation of Honda policy and may result in discipline, up to and including termination from employment.



For the full [Safe, Secure, Healthy Work Environment policy](#) visit [HondaWeb](#)

# You, Honda and Our Customers

## Protecting Honda Resources and Assets

We all have a responsibility to use Honda's resources and assets wisely and with care and to ensure that Honda's property is not misused, damaged, lost, stolen, or wasted. Properly care for these and all other Honda assets.

Use Honda assets for company business or for purposes authorized by management. Protect them from theft, carelessness, waste, and misuse, and document all asset inventories accurately and honestly.



## Electronic Information Devices

Business tools that are supplied by Honda and/or any device or system connected to the Honda network is for the purpose of increasing productivity and the quality of your work. Examples of these business tools are email, internet access, phones, computers, tablets, voicemail, and removable media. Use these business tools in a productive, professional manner, and remember:

- Passwords are provided and assigned to individual associates for their specific job function; they are not to be shared.
- Devices should not be connected to any network not permitted by Honda.
- The use of these tools must not violate our harassment-free policies.
- Copyrighted material, trade secrets, other confidential information, or business records may not be transmitted or received without proper approval, and may only be shared in compliance with applicable confidentiality requirements.
- These tools should not be used to perform work for non-Honda business.
- Limited personal use of the Company's electronic business tools may be acceptable if it does not violate Honda policies or interfere with your work performance or the work of others.
- Communication sent or received on company systems, including internet activity, is not private. The Company has the right to record, view electronic communication, and monitor internet activity on company systems and to block associates from visiting specific internet sites, or limit the amount of time an associate may spend on a specific website.
- Email must be treated as any other business document. Therefore, be clear, professional, and polite in your communication. Proofread the content and recipient list before hitting "send."
- Business records must be retained according to the *Global Record Retention Policy* and per any litigation holds.

If any of your Honda-issued assets are lost, stolen, or damaged, you should contact your manager and your local Information Security group immediately so that your device can be disabled and any additional measures can be taken.

## Doing Business with the Government

Honda strives to be a company that society wants to exist. A critical step in meeting this goal is to consistently abide by the federal, state and local laws and regulations that govern our business everywhere we operate. There are a multitude of laws and regulations that govern a company's ability to successfully obtain and maintain a contract with a government entity. Our policy is to comply fully with all applicable laws and regulations that apply to government contracting and transactions.

Those who oversee work with governments and government-owned entities (such as public colleges and universities) must remain up-to-date on relevant regulations and should contact AHM Law with any questions. Special care should be taken to ensure that any agent, while acting on behalf of Honda, who provides goods or services on government projects, is aware of and abides by our high standards as well as their contractual and legal obligations. There are also a number of rules and procedures for complying with the required disclosure of solicitation of government business which may, in some cases, constitute lobbying activities. AHM Government and Industry Relations can provide guidance on any potential lobby law requirements or disclosures necessary to solicit business with a government entity.

If you work with government officials and contracts, you are responsible for understanding and complying with all applicable laws. For example, many government officials are prohibited from receiving gifts (including food and drink), entertainment and travel. In some countries, government regulations may also apply to the hiring of current, or recently retired, government officials and their families. Avoid any conduct that may be viewed as improperly influencing the objective decision-making of government officials.

If you aren't sure, consult with AHM Government and Industry Relations or AHM Law.





## Product Safety and Quality

We are dedicated to supplying products of the highest quality at a reasonable price for worldwide customer satisfaction. Remember, the Joy of Buying – one of the Three Joys – is achieved through providing products and services that exceed the needs and expectations of each customer.

Our reputation is riding on the safety and quality of every product we make. Put quality into everything you do. Follow all operation and safety standards and procedures and take the initiative to let your manager, Senior Manager, or other appropriate Honda Safety Personnel know of any product or process that does not meet relevant motor vehicle safety laws and regulations or Honda's quality or safety standards. You may also use the Compliance & Ethics line to report any safety or quality concern. Never attempt to conceal substandard work or products or components. As you think about product safety and quality, remember that people you care about use our products.

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**Q:** During an external audit, the auditor requested that we provide a test report for an item listed in our Operation Standard. We are in the process of training several new associates and missed performing the necessary test. My senior manager asked me to retrieve the test reports and when I spoke with my manager, he asked me to create a report and post-date it. How can I raise the issue without upsetting my manager?

**A:** Under no circumstances should you ever create false records whether or not there is an audit. If you are comfortable, let the manager know that it's against Honda policy and it's better to inform the auditor that the records do not exist. If the manager persists, notify your senior manager of the request and that you refused to comply. The senior manager should then take the appropriate action to address the issue. You also may report the issue through the Compliance & Ethics line.

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We purchase goods and services, as well as develop and maintain business relationships based on sound business reasons, such as suitability, diversity, quality, delivery and cost. All purchasing arrangements must be done pursuant to the Indirect Procurement Governance Policy ("IPGP") where applicable and your company's individual procurement policies. Any goods/services purchased must be in compliance with the applicable IPGP and all contractual arrangements must be properly executed to govern the legal



relationship and all Orders/purchases must clearly document and clearly identify all the services or products to be provided, price, and payment terms. No payment on behalf of Honda shall be approved without adequate supporting legal documentation in place.

Honda believes in doing business with business partners who embrace and demonstrate high standards of ethical business behavior and who share Honda's commitment to diversity and environmentally sound business practices.

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**Q:** I have reason to believe that one of our key suppliers is not enforcing safety rules. Should I be concerned?

**A:** Honda's reputation for doing business right can be damaged by the acts of our business partners. Report your concerns to your manager or Compliance & Ethics so they can determine the right course of action.

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## **Business Partner Information**

It is very important to respect the confidential information of business partners. Never use or disclose a business partner's confidential information, such as drawings, engineering or technical documents, methods or instructions, or pricing, even to a Honda affiliate, unless it is legally authorized and with the written permission of the business partner. If you are not sure, consult with Compliance & Ethics, AHM Law or your local legal group. (Also see Competitive Intelligence.)

## **Conflicts of Interest**

A conflict of interest exists whenever you have a competing interest or loyalty that may interfere with your ability to make an objective decision for Honda. Each of us is expected to use good judgment and avoid situations that can lead to a clash between our professional obligations and our personal interests or that of our family members. That includes even the appearance of a conflict which can undermine the trust others place in us and damage our reputation.

Conflicts of interest may be actual, potential or even a matter of perception. Since these situations are not always clear-cut, you need to fully disclose them to a member of leadership or Compliance & Ethics so that we can properly evaluate and manage them. If unsure, it is best to report the issue.



## Selecting Business Partners

You must select and deal with suppliers, service providers, dealers, competitors, customers, or any business entity that does business, or seeks to do business, with Honda in an impartial manner, without favor or preference based strictly on the best interests of Honda. For more information, see your Company's procurement policies.

## Self-Dealing and Corporate Opportunities

If you learn about a business opportunity through your work, Honda's interests take precedence. This means that you, or your family members, must not take that opportunity unless you have fully disclosed your interest in that opportunity in writing to the Compliance Officer, and you have been notified that a determination has been made that such interest will not affect the impartial discharge of your duties or obligations to Honda. Any such opportunity should be reviewed in advance through Compliance & Ethics. The topic of insider trading is addressed under the section You and Business Information.

## Services and Discounts

You, or your family, may not accept any special services, discounts, or rebates from our business partners, competitors, customers, or any business entity that does business, or seeks to do business, with Honda unless they are made publicly available to all associates at your company.

## Outside Employment


Outside employment can create a real or perceived conflict of interest. You may not seek compensation of any kind, including loans, payments, subsidies, or services from our business partners, competitors, customers, or any person or business entity that does business, or seeks to do business, with Honda.

To ensure that there are no conflicts and that potential issues are addressed, even if it is only a perception that a conflict of interest may exist, you must disclose and discuss outside employment with your manager and/or your company's Compliance Officer, which can be facilitated through Compliance & Ethics.

## Former Associates Seeking to do Business with Honda

It is generally Honda's policy not to conduct business with former associates, whether on their own behalf or on behalf of their new employer, within two (2) years after separation from Honda or a Honda affiliate. Honda may continue to do business with the supplier, but require that the former associate not be a liaison to Honda.

An exception to this policy can be made with written permission from your Compliance Officer, which can be facilitated through the Compliance & Ethics function.



Among the factors to be considered are:

1. Does the former associate's employment at Honda or a Honda affiliate provide him or her (or employer) a competitive advantage by:
  - Providing him or her access to pertinent Honda or competitor's information?
  - Previously influencing Honda's decisions in areas for which the former associate (or employer) now seeks to do business?
2. Will it create an appearance of "unfairness" to others competing for Honda's business? The appearance of unfairness is more likely if:
  - The former associate was/is in a position to influence contracting or retention decisions for Honda.
  - Other competing businesses could reasonably conclude that item 1 is true based upon information available to them.

After the two-year period, a business division may decide whether to conduct business with the former associate and should continue to consider the same factors above.

## Financial Dealings and Investments


You must not have a significant financial interest in any of our business partners, competitors, customers, or any other business entity that does business, or seeks to do business, with Honda except where such interest has been fully disclosed in writing to the North American Region Compliance Officer and a determination has been made that such interest will not affect the impartial discharge of your duties or obligations to Honda. As a guide for the purpose of determining the necessity for disclosure of such interest to Honda, ownership in such a business entity shall be deemed significant if the aggregate interest of the associate, her or his spouse, or close relatives of the associate represents 1% of the outstanding securities or total equity of such firm or corporation. The North American Region Corporate Compliance & Ethics Office will facilitate the process. See the list of contact numbers at the end of this Policy.

Publicly traded mutual funds or similar pooling of securities, where the individual investor has no say in which investments are included, generally do not create a conflict of interest and do not require approval. If you are unsure whether there is a conflict, contact Compliance & Ethics.

## External Boards

We encourage and are proud of associates' involvement in and attempts to improve their communities through their participation on boards of organizations that benefit education, the arts, athletics, scouts, and similar endeavors.





However, affiliations with outside organizations, such as membership on a board of directors or advisory board, may also lead to actual, potential, or perceived conflicts of interest. Being transparent about board memberships is beneficial for both Honda and associates.

You may not accept a seat on a board of directors or advisory board of any of our business partners, competitors, customers or any business entity that does business, or seeks to do business, with Honda or our dealers without advance written approval by the president of your company. For more information, see the *Honda – North American Region External Board Approval and Disclosure Policy* on HondaWeb. The policy has guidelines for approval and disclosure of both for-profit and non-profit organizations.

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**Q:** I want to sit on the board of my religious organization. Do I need approval?

**A:** No. Disclosure or approval is not required with respect to positions with the following types of organizations: condominium associations, religious institutions, or volunteer work with entities such as parent-teacher associations, youth sports organizations, scout groups, community volunteer organizations, or similar endeavors. If you are in doubt whether your organization of interest would fall within the exception category, contact Compliance & Ethics or your compliance officer.

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## Personal Relationships

You must disclose to your management when family or personal relationships might influence, or be perceived to influence, your ability to make objective decisions. Management is responsible for putting appropriate controls in place and determining whether you can continue to be involved in those decisions.

## Reciprocity

Providers of goods and services must not be asked to buy goods and services from Honda in order to become or continue as a supplier or service provider, whether or not the goods or services are directly tied to the goods and services that Honda is receiving in the arrangement.

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**Q:** I have become very friendly with an associate who works for me. What is Honda's position on managers dating subordinates?

**A:** A romantic relationship with a direct or indirect subordinate can hurt morale and disrupt productivity. It may also create a conflict of interest or the appearance of a conflict of interest. If you are in such a relationship or know someone who is, you should report the relationship to your manager, Human Resources/Associate Relations or Compliance & Ethics.

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**Q:** I have run into a problem with a supplier. I need to replace the supplier immediately so that the project won't fall behind schedule. My neighbor's company provides similar services at an even lower rate. Can I ask their company to take over?

**A:** If you'd like to recommend your neighbor's company, you can do so, but you must disclose your relationship to your manager and remove yourself from the supplier selection process. We should avoid giving the impression that we play favorites, and we should never take shortcuts in the bidding process. Remember, all associates must follow Honda's sourcing and procurement policies and procedures.

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## Gifts and Entertainment

At Honda, we pride ourselves on building strong relationships with business partners and customers. On rare occasions, entertainment or gifts may be offered to you. The preference is for you to explain that neither gifts nor entertainment are expected or encouraged from those doing business with Honda. Acceptance of gifts or entertainment may create an appearance of a conflict of interest. Even the appearance of a conflict can be damaging to you, Honda, and our business partners.

To ensure that we don't create a perception of impropriety, adhere to the following:

- **Any gift or entertainment must be legal, consistent with both companies' policies and our values and**
- **Never be accepted during the bidding process for new business;**
- **Never be in cash or a cash equivalent (such as a Visa gift card);**
- **Never be received or offered for something in return;**
- **Never be encouraged or solicited by you or a family member; and**
- **Be infrequent.**

- 
- **Gifts must be nominal in value (policy limit of \$50 dollars (Canada/US) or \$1000 pesos (Mexico)).**
  - **Entertainment or other favors must be of a character that does not go beyond common courtesies consistent with ethical and accepted business practices. When appropriate, consult with Compliance & Ethics in advance to discuss your specific situation.**
  - **The Honda associate, as well as the business partner, competitor, or business entity must be present; otherwise, the meal or entertainment must be treated as a gift.**

### **Providing Gifts and Entertainment**

At times, it may be appropriate to provide a modest gift or entertainment to a business partner. Lavish spending on business gifts is unacceptable because it can create the perception that we are trying to obtain or give favorable business decisions by providing individuals with personal benefits.

Honda is prohibited, either directly or indirectly, from offering any financial remuneration to any governmental authority/official.

Gifts and entertainment provided to other entities must be accurately reported by the associate and recorded in Honda's financial records.

Any situation that may appear to be a conflict of interest must be reviewed by Human Resources/Associate Relations or Compliance & Ethics. If you're ever in doubt, you should disclose the issue.

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**Q:** I overheard my manager talking about a World Series baseball game that a business partner treated her and a guest to over the weekend. It sounded excessive to me; however, I don't want to get her in any trouble (she is a good manager) and I sure don't want any unnecessary attention. Should I say anything?

**A:** All associates have a right and responsibility to bring forward concerns, even if they are not sure a violation has occurred. We understand it may be difficult to do so. Honda has provided many channels for associates to communicate concerns, including the option to remain anonymous. In addition, Honda has clear policies prohibiting retaliatory actions and behaviors.

Since you had a concern, you should raise the issue. This is particularly true since it involved a high-profile sporting event. Ideally, the manager has already disclosed this situation to her manager and an informed, appropriate decision was made. Raise the issue to protect the integrity of Honda, our process, and our associates.

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# Guidance for Acceptance of Gifts/Favors/Discounts/Entertainment

## Guidance for Gifts, Favors, Discounts

### Generally Acceptable – Exercise Good Judgment

- Gifts of little or insignificant value, e.g., promotional items (hats, pens, coffee mugs, etc.)
- Any other gift valued below and up to \$50 dollars (Canada/US) or \$1000 pesos (Mexico)
- Retail offers to the general public

### Careful Consideration – Consult

- Discounts or special offers (must be publicly available to all associates in your company)
- Competitions or drawings at events attended for work with prizes that can be regarded as gifts
- “Thanks for your help” gifts from suppliers/dealers
- Business travel expenses

### Unacceptable

- Gifts of more than \$50 dollars (Canada/US) or \$1000 pesos (Mexico) in value (except for consumable items such as food baskets that may be shared with the team)
- Gifts of even a nominal value received during a bidding/negotiating process for new business, or with conditions attached
- Money and items that can be easily redeemed for cash
- Compensation of any kind, including loans, payments, or subsidies
- Promises of employment or other favors for relatives, friends, etc.
- Overnight accommodations (business or personal)
- Personal use of a business partner or potential business partner’s private property, such as a condo or boat
- Frequent acceptance of even nominal gifts
- Receiving gifts at any non-Honda location (e.g. personal residence or other non-work locations)
- Receiving gifts to any non-Honda email address (e.g. personal email address)

## Guidance for Entertainment (including Meals)

### Generally Acceptable – Exercise Good Judgment

- A working lunch or dinner or social dinner reflective of the business partners relationship with Honda
- Standard tickets to a normal sporting (such as, pre- or regular season) or cultural event

### Careful Consideration – Consult with Compliance & Ethics

- Above-standard tickets, such as, luxury box/suite or play-off/championship events, higher than face value, to a sporting or cultural event
- Tickets to a high-profile sporting or cultural event

### Unacceptable

- Any entertainment, events, trips, or accommodations intended to influence a decision, negotiation, business arrangement, or purchase
- Entertainment received during a bidding/negotiating process for new business, or with conditions attached
- Frequent acceptance of entertainment/meals

# You, Our Communities and the Environment

## Supporting Communities Where We Work and Live

For more than 60 years in the U.S., Honda has been committed to making positive contributions to the communities where its associates live and work. Honda's mission is to create products and services that improve the lives of people while actively supporting community organizations.

While every associate is encouraged to become involved in their local community by volunteering and supporting organizations and events, it is important to remember that associates should not pressure others, inside or outside of Honda, to contribute or participate in our community or charitable organizations. Associates should disclose any active relationship with an external organization prior to participating in Honda's decisions related to the organization.





Associates should:

- **Take community needs and interests into account when making decisions;**
- **Ensure that an associate's personal support of a charitable organization is not viewed as Honda's endorsement of the organization;**
- **Follow company policies and/or procedures for making and soliciting charitable contributions;**
- **Obtain approval from management before using any Honda resources to advance a charitable goal; and**
- **Not ask Honda's business partners, or those seeking to do business with Honda, to support charitable organizations without prior approval.**

Watch out for:

- **Requests from business partners to give to charitable causes. These requests must be approved by Honda, like all other charitable contributions. If a business partner asks an associate to contribute their personal funds, associates are under no obligation to do so. If an associate receives such a request and would like to make a contribution, the associate should consult with Corporate Social Responsibility to ensure that the contribution is appropriate and legal.**

#### To Learn More

If you have questions or concerns about a charitable contribution or your work in the community, contact AHM Corporate Social Responsibility.

## Commitment to the Environment

Honda's vision for a carbon-free society is leading to comprehensive efforts to address society's environmental and energy concerns across the company's products and business operations. Honda has consistently been ranked as a leader in fleet average fuel economy and low CO<sub>2</sub> emissions among major full-line automakers in America, according to the U.S. Environmental Protection Agency (EPA). Honda also is working to reduce the environmental impact of its business operations and promotes environmentally responsible business practices with its suppliers and retail dealer partners across North America.

This is part of our commitment to the future and our dedication to applying the Honda Philosophy to our actions and decisions. Honda's policy is to comply with all environmental laws, go beyond legal requirements where appropriate, and seek ways to minimize environmental impact.

We all have a role in protecting the environment and are expected to perform our jobs in accordance with the federal, state and local environmental laws and regulations. For example, you are expected to understand and comply with all Honda procedures relating to the handling, packaging, and transporting of hazardous materials. Honda associates are also encouraged to use their creativity and initiative to improve the efficiency of our products and operations so that they use less energy and produce fewer emissions. We can demonstrate sound environmental practices in every part of our daily operations, through our efforts to reduce waste and conserve energy and water and by reusing or recycling all appropriate materials. If you notice any potential environmental hazards, or opportunities to improve Honda's environmental practices, notify management immediately.



BLUE SKIES FOR  
OUR CHILDREN

## Political Activities

Honda encourages associates to exercise their right to vote and participate in the political process. Like all responsible citizens, Honda actively participates in the legislative process and, from time to time, in the political process as well. However, corporate participation in the legislative and political processes is highly regulated. No Honda funds or assets can be used for federal, regional, or local political campaign contributions, even where permitted by law without prior written approval of the Vice President of AHM Government and Industry Relations and the executive level associate in the respective Honda Company making the contribution. Those prohibitions not only cover direct contributions but indirect assistance or support of individual candidates, ballot initiatives or political parties by such means as purchasing tickets for special dinners or other fundraising events, or the furnishing of any other goods, associates, services, facilities or equipment to political parties or committees.

In addition, no Honda funds or assets will be used for political contributions outside of North America, even if permitted by applicable law, without the prior written approval of the Vice President of AHM Government and Industry Relations.

The above prohibitions apply only to the use of Honda corporate funds or assets for political purposes and are not intended to discourage associates from making

personal contributions to candidates, parties or committees of their choice, including lending your services on your own time and at your own expense. If you are involved in politics, you must express your views as an individual, not as a representative of Honda. Therefore, implying endorsement, authorization, or using your status as a Honda associate to promote a political position is prohibited.

If in your official capacity as a Honda associate you have reason to interact with political candidates or elected officials running for (re)election, please make sure you consult with AHM Government and Industry Relations, AHM Law or your company's legal group for guidance in this area

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**Q:** I would like to run for political office. Is that OK?

**A:** Yes, as long as you are not using Honda's name or assets, or attributing your views to the business.

**Q:** Can I host a facility tour for an elected official who is running for re-election or higher office?

**A:** Many factors go into that decision and you should first consult with AHM Government and Industry Relations for guidance and approval.

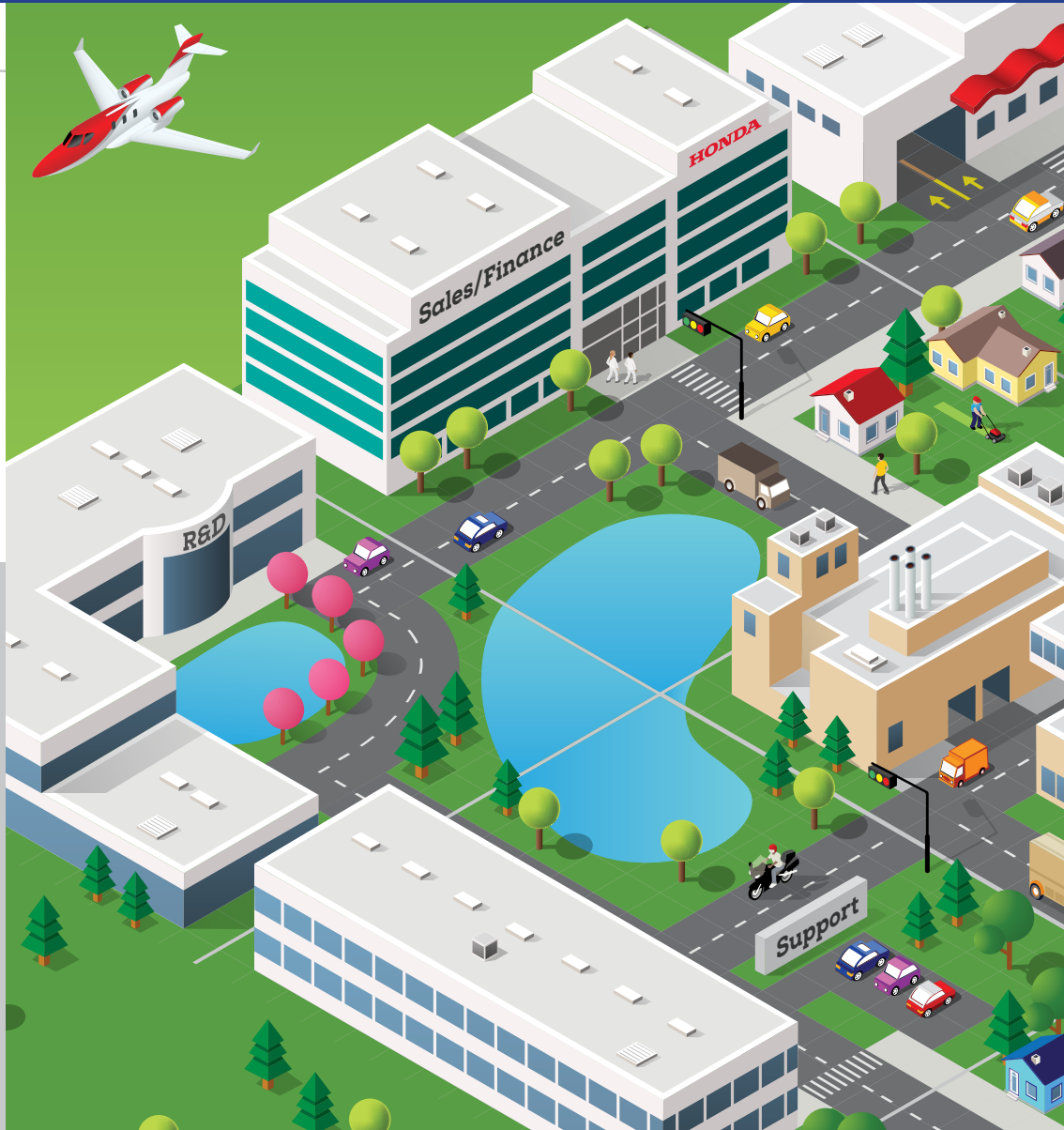
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# You and Business Information

## Confidential Information

Honda's continued success depends on developing knowledge and using it to improve the business. Any knowledge that is known only to Honda, gives Honda a competitive advantage, or that has been entrusted to Honda by a business partner, customer, or associate is confidential information that must be protected. Examples include information that is critical to Honda's or a supplier's core business such as research and development plans or ideas; source codes; design drawings or specifications; manufacturing methods; business and strategic plans; financial data and reports; pricing and marketing strategy; personal information of associates, business partners, or customers; computer programs; and any other sensitive information.



You have an obligation to safeguard confidential information by:

- **Keeping it secure, locking cabinets and desks, and protecting sensitive documents with passwords;**
- **Keeping passwords confidential in accordance with Honda policy;**
- **Properly securing laptops and other mobile storage devices;**
- **Using the appropriate data classification markings of “S,” “A,” or “B,” or their equivalent if your company uses a modified classification system;**
- **Discussing it only with other Honda associates who have a need to know in order to do their job;**
- **Not discussing it in public or inadvertently sharing it with others (such as in an airplane or similar environment);**
- **Not posting any confidential information to social media sites;**
- **Disclosing it outside Honda only if you have the required permission to do so and the party receiving the information has signed a Honda confidentiality agreement pertaining to the subject matter of the disclosure;**

- **Consulting with AHM Intellectual Property, AHM Law and/or your company’s legal group if you know of any ideas, inventions, or developments that may be eligible for protection by patent, copyright or trademark; and/or**
- **Complying with Honda’s policies and procedures regarding confidential information.**

If you are a manager, confirm that access rights to confidential information have been revoked when associates change positions and no longer need it, or when outside contractors or entities have completed the project for which they had been given access.

For additional information, see the Global Confidentiality and Global Privacy policies located on HondaWeb.

When your Honda employment ends, your obligation to protect Honda’s confidential information continues and all of Honda’s property and documents held by you must be returned to Honda.





**Q:** Occasionally, on rush projects, we need to provide our business partners with confidential Honda information right away. Is it acceptable to provide the information first and then quickly follow up with a non-disclosure (confidentiality) agreement?

**A:** No. Disclosing the company's confidential information without first having the recipient sign a non-disclosure agreement (NDA) would be a serious breach of your obligation to protect Honda's assets. Not obtaining an NDA could forfeit certain protections by revealing our confidential information. These types of agreements (sometimes referred to as confidentiality agreements) for the most part are, simple relatively short documents. Please contact Purchasing if you need a supplier to sign an NDA.

**Q:** I found a picture on the internet that I think would look great in a presentation. Since it's available online, I don't need permission to use it, right?

**A:** Many people incorrectly believe that images, such as photos, that they find on the internet or receive through a social network are available for anyone to use. Using the image without permission could infringe on the rights of the owner of the image. You should always get permission before using the intellectual property of another person. If you have any questions or need assistance in obtaining approval, you should contact AHM Intellectual Property.

## Intellectual Property and Trade Secrets

Honda's intellectual property (IP) and trade secrets are important assets that we must consciously work to protect.

Some examples of our IP are:

- Strategic, business, and marketing plans
- Company initiatives (existing, planned, proposed or developing)
- Customer lists
- Compilations and formulas
- Methods, know-how, processes, and techniques
- Scientific and engineering discoveries, innovations, designs, and drawings for them
- Names, symbols, logos and slogans
- Original works of art or publications, including literary, musical and audiovisual
- Systems, software, and source codes and related technology



## Competitive Intelligence

Information about competitors is a valuable asset in today's competitive business environment. When collecting business intelligence, you, and others who are working on our behalf, must always live up to the highest ethical standards. Never engage in fraud, misrepresentation or deception to obtain information.

Discuss any questions or concerns about collecting business intelligence with Compliance & Ethics or AHM Law.

## Cybersecurity

Honda companies store information and data on computers and in networks, including confidential business records, and associate, supplier, and customer information. Additionally, many of our vehicles and other products are, or will become, connected to the intranet. In this policy, "cybersecurity" refers to measures taken to protect a computer, computer systems, or our products from unauthorized access and attacks by third parties.

A security breach that involves competitively sensitive information, such as trade secrets, customer lists, or marketing plans, may threaten the ability of Honda to compete and erode the confidence of our associates and customers. In addition, a breach could potentially lead to business interruptions, reputational harm, and millions of dollars in lost business, damages from lawsuits, and

governmental fines. Likewise, a breach that affects connected products could result in safety risks for our customers or the disclosure of their confidential information stored on the products.

Honda has taken steps to protect its computer systems and products from breaches, intrusions, or negligence that will result in theft or loss of data. However, almost all are the result of human error. The most critical factor in Honda's cybersecurity protection systems hinges on what you and every associate does on a daily basis, both internally and externally. For that reason, engage in good cybersecurity practices.

For clear guidance and direction, see the [North America Information Technology Security Policy \(NAITSP\)](#) covering global, regional, and cybersecurity policies.

## Insider Trading

The law prohibits buying or selling a company's stock when you know material and non-public information about that company. Material information is information which could affect the value of the stock or influence a reasonable investor to buy or sell stock.

Associates aware of material, non-public information relating to Honda, companies with whom Honda does business, or with whom Honda is seeking to do business, may not directly or through friends or family:

- **Buy or sell stock until that information is made public by the company;**
- **Pass information on to others, including other Honda associates; and/or**
- **Make substantial changes to their contributions in the Associate Stock Purchase Plan (if applicable).**

Contact AHM Law and/or your local company's legal group with any questions on this Policy.

## Business and Accounting Practices

All records, reports and documents must be complete and accurate. Never make false or misleading entries, statements or alterations in any record whether it relates to financial data, business data such as safety, quality and personnel files; or any other kind of information. When compiling information to be reported to other Honda associates or outside Honda, refrain from making assumptions and generalizations or making decisions based merely on past practices without verification, confirmation, or approval. Always follow appropriate accounting principles and practices, as well as our internal controls and the Global Record Retention Policy.

All payments on behalf of Honda must have adequate supporting documentation and be properly approved and made with the intention and understanding that any part of such payment is only to be used for, and related to, the described purpose.

The supplier payment process generally begins with an approved Purchase Order, which identifies the goods and/or services being provided. This prevents fraud and ensure segregation of duties. Some companies may have unique circumstances where a Purchase Order is not practical. Non-Purchase Order transactions must have the same controls in place that Purchase Orders provide.

Honda submissions to government entities must be complete, clear, and accurate and never misleading.

Do not hide expenditures or establish any undisclosed or unrecorded funds, assets or liabilities.

It is imperative that in your written and oral business communications you always tell the truth and avoid exaggeration, inappropriate language, and derogatory remarks or characterizations. Not only is it the right thing to do, but business records and communications may also become known to the public through litigation, government investigations and the media. This applies to communications of all kinds including oral, email, voicemail, texts, daily planner notes, and other “informal” notes or memos.

Remember, only share information with those who have a business need to know and are part of the business processes. Records of all kinds, including electronic records, should always be retained and maintained according to the Global Record Retention Policy. Some records must be retained beyond the time specified in the Policy if they relate to a pending or potential lawsuit, claim, or government investigation. If you aren't sure, contact Compliance & Ethics, AHM Law, and/or your company's legal group for guidance. Never store Honda documents or files at home.

Consistent with applicable laws, Honda does not extend personal loans to corporate directors and the executive officer.

## Legal Holds

**Never alter, conceal or destroy documents or records if they have been requested by a government agency, if they are likely to be requested in connection with an investigation or if they have been placed on a litigation hold by AHM Law, AHM Intellectual Property or your company's legal group. And, of course, never lie or mislead any government representative or lie in connection with any legal or administrative proceeding, and never try to influence others to lie or mislead.**

**Q:** One of my co-workers asked me to approve an invoice for services that have not yet been performed. They told me it's not a big deal; the company is going to perform the service next week. What do I do?

**A:** If you approve, this invoice knowing we have not received the services (and the contract does not expressly call for advance or pre-payments), you have made a false report. Honda has protocols that must be followed. Talk to your co-worker or manager about your concern. If you're not comfortable doing that, contact a member of Accounting & Finance, Compliance & Ethics or AHM Law and/or your local company's legal group about how to proceed.



## Government Requests and Investigations

Governmental agencies sometimes request information from Honda, and it is always possible that such agencies will make detailed inquiries into Honda affairs. Always be truthful and appropriately responsive to governmental requests for information, including requests made during investigations.

If you receive a non-routine request for Honda information from a government agency or attorney, immediately notify AHM Law and/or your local company's legal group before responding. This helps to ensure that Honda's response is appropriate both for the Company and under the law. If you are in doubt whether the request is routine, always refer it to AHM Law and/or your local company's legal group. (Also see Business and Accounting Practices.)

## Litigation and Claims

Like all large businesses, Honda is sometimes involved in disputes that may result in claims or litigation, or Honda may have documents or information that parties in a litigation not involving Honda may believe are relevant to that litigation. If you receive a legal document related to Honda, you must immediately contact AHM Law and/or your local company's legal group to ensure an appropriate and timely legal response. Examples include summons, statement of claim, complaint, or any other type of written communication demanding compensation;

a subpoena, or similar request for documents, records, or information related to Honda or its associates, customers or vendors. Do not respond to any request, answer questions, or produce documents without first discussing the situation with AHM Law and/or your local company's legal group.

Under no circumstances should you ever threaten or initiate legal action on behalf of Honda, or respond to any legal document or threat of legal action against Honda, without the prior advice of AHM Law and/or your local company's legal group and approval of senior management.

## Communicating with the Media

Honda values its relationship with the media. Communicating clearly and accurately serves to protect and enhance Honda's brand and reputation. We follow a careful review process when determining what and when to share with the media. Due to the potential sensitivity of sharing information with the media, Honda allows only North American Corporate Communications ("NACC") and Public Relations to communicate with the media on the company's behalf. Associates should not respond directly to media inquiries. An associate who receives a media inquiry should immediately forward it to one of these groups.



## Social Media

The use of social media and online forums have grown significantly in recent times. If used appropriately, social networking tools and online forums may be new channels for sharing information regarding our products and services. However, if not done properly, any such use may expose you and the Company to significant legal and reputational risks.

All associates, contingent associates, dealers, suppliers and vendors are responsible for what they post online. Under the social media policy, racist and discriminatory remarks and content, harassment, threats of violence or similar inappropriate or unlawful conduct will not be tolerated and may be subject to disciplinary action up to and including termination.

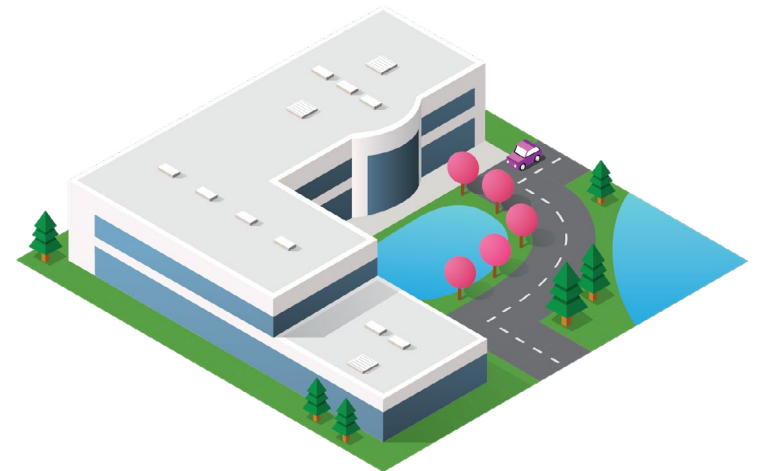
Make sure that comments related to any aspect of company business posted via social media and online forums are properly distinguished between the official position of Honda and those made from unofficial or unrelated sources. Never give the impression that you are speaking on behalf of Honda in any personal communication, including customer forums, blogs, chat rooms, and bulletin boards such as Twitter, Instagram, LinkedIn, Snapchat, and Facebook. In your postings, never make negative or misleading comments about Honda or its customers, disclose Honda's trade secrets, confidential, and/or proprietary information (including pictures or customer information), or violate Honda's

intellectual property rights. If you see anything posted on a social media or online forums that you believe may violate this provision, or have a question about making a specific post, please contact Human Resources/Associate Relations, Compliance & Ethics or North American Corporate Communications.

Fundamental principles:

- 1. Be responsible and professional**
- 2. Be transparent, but only speak on behalf of yourself**
- 3. Protect the company's confidential information and intellectual property (as defined below)**
- 4. Follow the law and all Honda policies**

For the full [Social Media Policy](#) please visit HondaWeb



# You and the Law

## Compliance with All Laws

Honda follows all applicable laws and regulations and expects all associates to comply with all applicable laws and regulations in carrying out their responsibilities on behalf of the Company. No excuse or pressure can justify violating the law nor may a person acting on behalf of Honda (an agent) be used to do something prohibited by law or Honda policy.

Having embraced the goal of being a global company that society wants to exist, we need to be especially aware of different laws and customs that apply in the many societies and countries where we operate. Maintaining our global viewpoint means that we respect the norms of our business partners, customers, and co-workers throughout the world. However, the standards and principles in this Policy, unless inconsistent with local law, take priority over those norms and customs and must be followed by every associate. If they are inconsistent, seek guidance from AHM Law and/or your local company's legal group.



## Antitrust and Competition Laws

Honda supports free and open competition as well as compliance with the antitrust laws intended to promote competition. Antitrust and competition laws prohibit, among other things, agreeing with competitors to limit production, fix prices or divide markets, customers or territories. They also may govern exclusive purchasing or sales agreements with suppliers and customers. This area of the law is extremely complex and can vary from state to state, province to province and country to country but certain rules generally apply:

- **Never discuss or share with a competitor any competitively sensitive information, regardless of whether it's ours or theirs, such as pricing;**
- **Never share competitively sensitive information of business partners or other third parties with their competitors, such as pricing; and**
- **Never take advantage of anyone through manipulation, abuse of privileged information, misrepresentation of facts, or any other intentionally unethical or illegal action.**

For more information, see the Honda North American Region Antitrust and Competition Law Compliance Policy and Manual on HondaWeb. If you are ever in doubt about whether a transaction may violate antitrust laws consult AHM Law.

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**Q:** I am a longtime friend of someone who is now a sales representative for a competitor. When we see each other socially, we talk about the industry and he sometimes tells me about his company's pricing strategies. I don't feel comfortable about the situation. What should I do?

**A:** Tell your friend it's inappropriate to discuss pricing information and delete any pricing information that friend gave you. Then report the matter to Compliance and Ethics, AHM Law and/or your company's local legal group. To avoid even the appearance of impropriety, Honda associates should never engage in conversations with our competitors about pricing, marketing or any other competitive activity without first contacting AHM Law.

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## Anti-Corruption and Anti-Money Laundering Laws

Honda strives to be a company that society wants to exist. A critical step in meeting this goal is to consistently comply with the letter and spirit of anti-corruption and anti-money laundering laws in every jurisdiction in which we do business. Honda strictly prohibits offering or receiving bribes, or money laundering, in any business transaction whether with a private entity or a public official. In addition, you may not make payments to people acting on behalf of Honda (agents) or any other representative of Honda if you have reason to believe that these payments may result in bribes to government officials or others. Just because a certain practice may be followed in a particular country or region of a country does not make the practice lawful. If you have any questions regarding practices in other countries contact the AHM Law and/or your local company's legal group. No associate will ever be disciplined for refusing to pay a bribe.

### Payments to Attain Business or Favorable Action

1. You are not permitted to pay money or give anything of value in order to get favorable actions or decisions from any type of government agency, to obtain/retain business from/with a private entity, or otherwise secure any improper business advantage. This applies to any payment or gift, whether it is made directly to a government candidate, official, or associate, indirectly through any political party or private

enterprise or made, directly or indirectly, to a business or associate thereof.

2. The foregoing prohibitions apply equally to the use of Honda corporate and personal funds or assets. They also apply to indirect payments made in any form, such as through consultants, advisors, suppliers, people acting on behalf of Honda (agents), sales representatives, dealers or other third parties.
3. These prohibitions extend to nominal payments of an administrative nature made in foreign countries (such as obtaining customs clearances, visas and work permits), otherwise known as "facilitation payments," unless failure to make the payment would create an imminent risk to an associate's (or his/her travelling companion(s)) personal health, safety, or physical or mental well-being. To the extent possible, any such facilitation payment must be pre-approved by the company compliance officer; otherwise, please notify AHM Law and/or your company's local legal group or your compliance officer about such payment as soon as possible.

For more information, see the Honda-North American Region Anti-Corruption and Anti-Money Laundering Policy on HondaWeb or check with AHM Law and/or your company's local legal group.

## Customs and International Trade

When importing or exporting products, information or technology, Honda will comply with applicable national laws, regulations and restrictions. This includes compliance with all applicable tax, tariff, and trade laws and regulations. All information you, or people acting on behalf of Honda (agents), provide to government officials or agencies must be accurate and truthful.

Honda has developed a multitude of policies in our trade with other countries, including, but not limited to:

### Supply Chain security programs

Honda actively participates in CTPAT, PIP, AEO and other supply chain security programs, and strongly encourages our business partners to join these programs or to meet the minimum security criteria which they obligate. These programs combat both threats of terrorism and contraband, protecting both national security and intellectual property rights.

### Preparation of shipping papers

All documents must denote a sufficiently specific description so to insure correct Harmonized Tariff Schedule classification, quantities, weight, and any other information which may be required for legal import or export.

## Valuation declaration and perfection

All declarations to Customs authorities must accurately reflect the value of the goods.

### Country of origin marking

All products must follow the various marking and labeling requirements as determined by local Customs authorities.

### Hand-carry across international borders

All Honda products, equipment and tools must be declared to Customs authorities when crossing every international border.

### Technology transfers

Exports of products and technology, even those common in the country of export, may be licensed or restricted from export to other countries or shared with non-residents; even other Honda associates who are non-residents and Honda companies in other countries.

### Anti-boycott efforts

Participation in any foreign boycotts of other countries is illegal. Immediately report any suspicion of improper request to AHM Law and/or your company's local legal group. Even if you don't participate in the request, failure to report a boycott request may result in denial of export privileges or penalties.



## Certificates of Origin and Free Trade Agreements

The use of preferential duty programs such as, but not limited to the USMCA/CUSMA/TMEC provide significant duty saving to Honda but require detailed calculations and records. Failure to follow the complicated rules of these agreements when making FTA claims to Customs authorities can result in catastrophic penalties to Honda and our customers around the world.



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**Q:** My work at Honda requires regular interaction or declarations to Customs officials. I am routinely asked to provide the customs officials with information about Honda imports and exports. Do I really need to contact AHM Trade Compliance/local trade compliance group or AHM Law/local legal group prior to each and every submission of information to the government?

**A:** The right approach would be to discuss the types of requests your department routinely receives from Customs with AHM Trade Compliance and/or your company's local trade compliance group, AHM Law and/or your company's local legal group to work out in advance a standard protocol that would be efficient, but also safe with respect to the laws that need to be followed.

Any other non-routine inquiries from Customs officials should be immediately forwarded to AHM Trade Compliance and/or your company's local trade compliance group.

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# Your Resources – How to Get Help

## Our Compliance & Ethics Program

The Compliance & Ethics program was established, in part, to provide associates, suppliers, and dealers with an alternate route to voice questions or concerns with regard to ethical or legal issues in our business. The goal of this program is to assure an environment in which everyone feels comfortable seeking advice on business ethics, or to help address potential legal or ethical violations, anonymously or otherwise, and to assist in consistently applying the Honda Philosophy to their actions and decisions.



To achieve this goal, the program consists of several parts:

- **The North American Compliance & Ethics Policy:** This Policy sets forth acceptable and expected business practices and conduct.
- **Training and communication:** Associates are required to take Compliance & Ethics training periodically.
- **Compliance Officers:** High-level associates are assigned by the governing authority (Board of Directors or managing members) to oversee the program. The Compliance Officer may designate a Compliance & Ethics Secretariat to support day-to-day activities.
- **The toll-free Compliance & Ethics Line:** This number may be used at any time, 24 hours a day, 7 days a week to report any possible violations of this Policy, anonymously if preferred. Compliance & Ethics associates do not use “caller ID” or make efforts to identify the number from which you are calling. Messages to the Compliance & Ethics Line will be transcribed and investigated as appropriate. (See North American Compliance & Ethics Contact Information.)

**The Compliance & Ethics Line is available to Honda associates. It is also available to business partners and other people acting on Honda’s behalf (agents) with a concern about our business practices.**

- **Compliance & Ethics (C&E) associates:** C&E associates are available if you have a question or want to ask a proactive question or report any ethical concern or potential or actual legal violation. You may remain anonymous.

Confidentiality for those who report concerns or who have an ethics question will be maintained to the fullest extent possible. All reports will be taken seriously.

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**Q:** Why are we expected to cooperate with Compliance & Ethics investigations? I would rather not get involved.

**A:** Your assistance is critical. When the Company conducts an investigation, it is reviewing the possibility of a violation of this Policy, other Honda policies or relevant legal requirements. The investigation is necessary to protect individuals, the Company, and, in some cases, the public. If associates do not cooperate, it may be impossible to get all the facts and take the right action.

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## Questions or Concerns

Honda believes that every individual can make a difference. According to the Honda Philosophy, you are expected to go to the spot, address problems personally, face reality, and report information directly to the appropriate Honda channel. This philosophy applies to ethical and legal issues just like all other issues. If you're ever concerned with the ethical or legal consequences of an action, address it professionally by using your own good judgment, this Policy, other Honda policies and the advice of appropriate Honda leadership.

If the right course of action is unclear, or if you have observed an unethical or illegal act, you are obligated to talk to your manager, other appropriate management, or Compliance & Ethics.

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**Q:** I just learned that a good friend of mine has been accused of harassment and that an investigation is being launched. I can't believe it's true and I think it's only fair that I give my friend advanced warning or a 'heads up' so he can defend himself. Don't I have a responsibility as a friend to tell him?

**A:** In some circumstances, you may be instructed not to give your friend a 'heads up.' Your friend will be given the opportunity to respond to these allegations and every effort will be made to conduct a fair and impartial investigation. An allegation of harassment

is a very serious matter with implications not only for the individuals involved but also for the Company. Alerting your friend could affect the fact-gathering process, jeopardize the investigation, and expose the Company to additional risk.

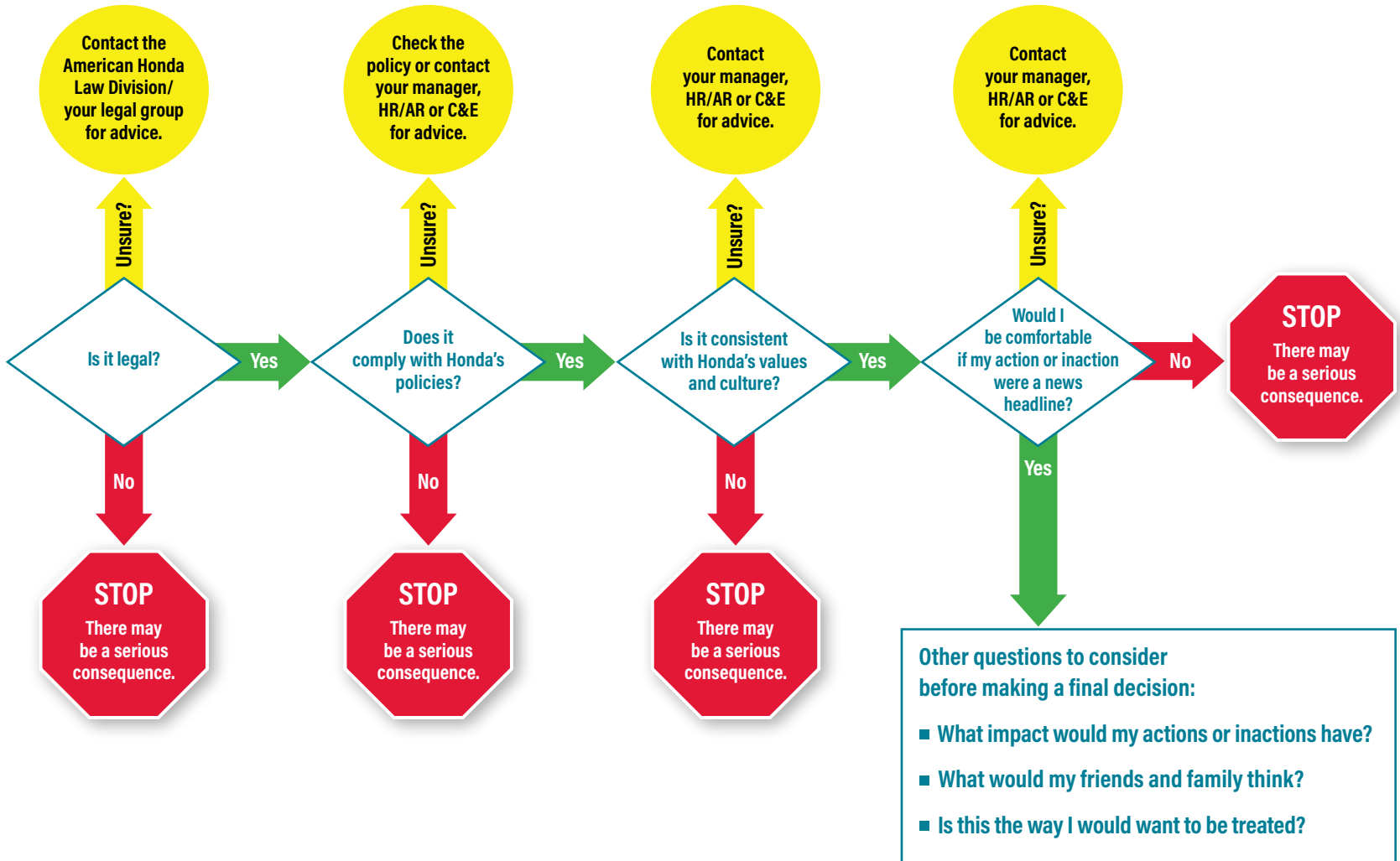
**Q:** My business unit sets various goals that we are asked to achieve. Sometimes I feel pressured to violate the policies to achieve these goals. Is this acceptable?

**A:** No. While successful businesses set high goals and associates strive to achieve them, you should never violate Honda's policies to achieve any goal. If you ever feel pressured, you can explain to your manager how you feel. If you are not satisfied with the outcome, or are still uncomfortable with the situation, you can report it to Human Resources/Associate Relations, Compliance & Ethics or use the Compliance & Ethics Line (see North American Compliance & Ethics Contact Information).

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## Difficult Decision?

This decision-making tool can be useful when you are faced with a difficult decision. If after asking yourself the following questions you are still unsure, talk to your manager, Human Resources/Associate Relations (HR/AR), Compliance & Ethics (C&E) or the AHM Law/your legal department.







## Reporting Concerns – Without Retaliation

If you have a concern, or see a possible violation, the Honda Philosophy calls on you to take the initiative and use your good judgment. This may mean, as a first step, talking to your manager. If you are uncomfortable reporting your concern to your manager, report it to senior leadership, Human Resources/Associate Relations, Compliance & Ethics or use the Compliance & Ethics Line (see North American Compliance & Ethics Contact Information). Calls to this line may be made anonymously. In order to completely investigate your concern, Compliance & Ethics must have as much information as possible.

When reporting misconduct, information should be provided that is specific and detailed enough to allow the allegations to be completely investigated. It is helpful to provide any pertinent documents and disclose sources of information.

If you have already reported your concern through internal resources such as Human Resources/Associate Relations and/or Compliance & Ethics, or you believe the concern should be reported at the regional level, you may contact the North American Region Corporate Compliance & Ethics Office (NAR CCEO).

Retaliation or adverse action against an associate for cooperating in a formal audit, investigation, or reporting a suspected violation of Honda policy, is a violation of the North American Region C&E Policy and other policies and will not be tolerated. Keep in mind that making a report that you know is false is also a violation of this Policy.

In addition to internal avenues available for reporting, associates also have the right to freely report any concerns externally to the appropriate authorities. Nothing in this policy, nor any other Honda policy prohibits, or is intended to prohibit, associates from reporting possible violations of law or regulation to any governmental agency or entity, or making other disclosures that are protected under such laws or regulations. One does not need the permission of anyone at Honda, including anyone in AHM Law or your local company's legal group, to make any such reports or disclosures. Although associates are expected to participate actively in the Compliance & Ethics program and report possible legal violations internally as described by this policy, there is no obligation to notify anyone at Honda that the associate has reported any such possible violations to a governmental agency or entity. Associates who choose to report externally are also protected from retaliation and/or adverse action on this basis as described and set forth by this Policy.

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**Q:** How can the company protect me from retaliation?

**A:** Honda will take all steps necessary to protect our associates who bring forward concerns from retaliation. Additionally, we will thoroughly investigate all allegations of retaliation and, if substantiated, corrective action, up to and including termination of employment, may result for those who have retaliated against an associate.

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## What to Expect When Contacting Compliance & Ethics

When contacting Compliance & Ethics with a question or concern this is what you can expect:

- **Your report, concern or question will be taken seriously and will be handled promptly, discreetly and professionally.**
- **All reports will be given the same consideration whether they are submitted anonymously or not.**
- **Any report or concern raised will be investigated or, if appropriate, referred to Human Resources/ Associate Relations or other internal resource channels for response or follow-up.**
- **We will maintain the confidentiality of your report to the fullest extent possible. However, information will be disclosed as necessary to investigate and address the situation appropriately.**
- **Substantiated concerns will be resolved through prompt and appropriate action.**



## North American Compliance & Ethics Contact Information

### United States

All US Honda Companies ..... 855-462-2236

Honda Aircraft Company, LLC (HACI)..... 888-217-6122

### Canada

Honda Canada Finance Inc. (HCFI) ..... 866-508-3288

Honda Canada Inc. (CH) ..... 866-508-3288

Honda Canada Trading Inc. (HTC) ..... 866-508-3288

Honda of Canada Mfg., Inc. (HCM)..... 877-434-5195

### México

Honda de México, S.A. de C.V. (HDM) ... 01800-4364685

Honda Trading de México,  
S.A. de C.V. (HTMX)..... 01800-4364685

## Global Compliance & Ethics Contact Information

North American Region Compliance & Ethics Line:

US/Canada ..... 1-855-462-2236

México ..... 01855-4622236

Honda Motor, LTD. (HM) Compliance & Ethics Email:  
[proposal@hm.honda.co.jp](mailto:proposal@hm.honda.co.jp)

## Other Resources

- Member of Management
- Human Resources/Associate Relations
- AHM Law
- Your Local Company's Legal Group
- Associate Handbook
- Company and Department Policies/Procedures

## Honda's Expectations of You

- If the right course of action is unclear, or if you have observed an unethical or illegal act, you are obligated to talk to your supervisor, other appropriate management or Compliance & Ethics.
- If in doubt – ask before acting. Your concern will be handled promptly, discreetly and professionally.





# Compliance & Ethics

This publication replaces the previously  
released *Honda North American Region  
Compliance & Ethics Policy*

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**HONDA**  
The Power of Dreams