

Charitable contributions guidelines

Johnson Controls sponsorship guidelines



The [Anti-Corruption Policy](#) lays out principles and provides guidance on how to conduct business honestly while complying with our Code of Ethics and the global principles of anti-corruption law. The Charitable Contribution Guidelines detailed below are an extension of and subject to that policy.

This document sets out the guidelines regarding Charitable Contributions and outlines the actions you must take when making or approving a Charitable Contribution on behalf of Johnson Controls.

Johnson Controls never makes Charitable Contributions for the purpose of influencing a decision.

Please note: This guidance document does not apply to non-charitable (trade/marketing) events and sponsorships. Non-charitable events and sponsorships are payments for event attendance, event sponsorship, or donations to non-charitable organizations or trade-related associations. Additionally, this document does not apply to corporate donations made through the [MyGiving](#) donation matching program.

These guidelines and scenarios will help you make the right decisions. If your specific situation is not addressed or you have questions, contact the Compliance team at askcompliance@jci.com.

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The guidelines use the following terms

Charitable Organization:

A non-profit organization that provides aid or assistance to others or has a philanthropic or public mission.

In the United States, only 501(c)(3) organizations qualify as Charitable Organizations for purposes of these Guidelines.

Charitable Contribution:

A Charitable Contribution is the transfer of something of value to a Charitable Organization, or for the benefit of a Charitable Organization, with no direct benefit to Johnson Controls expected or received in return. Charitable Contributions can be cash or in-kind (the donation of goods or services).

Johnson Controls donates to Charitable Organizations only and not to personal causes. Employees may contribute to personal causes, such as crowd-funding efforts, under their own names and with their own personal funds.

Government Organization:

Any organization that is: (i) a body or branch of national, regional, provincial, state, municipal or local government, whether legislative, executive, or judicial, or any person acting in an official capacity on behalf of a government entity; (ii) a public international organization or political party; (iii) a business entity owned, operated or controlled by, or otherwise under the influence of, a governmental body, agency or entity.

Johnson Controls prohibits Charitable Contributions that are made to improperly influence a decision impacting the business of Johnson Controls.

Guideline #1 – Obtain all appropriate approvals required for the contribution amount following the DOA Approval Matrix.

Compliance pre-approval is required for:

- All Charitable Contributions of more than \$10,000 USD, and
- All Charitable Contributions affiliated with a Government Organization of any value.

When Compliance pre-approval is required, submit a Charitable Contributions form via the [Compliance Portal](#). Do not commit to any contribution until you receive all required pre-approvals.

If the Charitable Organization is located outside of the United States or Canada and the donation amount is more than \$10,000 USD, the organization must also be screened and approved through the [Third-Party Compliance Program](#).

Guideline #2 - When requesting a Charitable Contribution, always provide sufficient information to show:

- The Charitable Organization's existence, nature, and overall legitimacy and reputation, and
- The justification for the charitable contribution

Guideline #3 - When proposing or approving a Charitable Contribution, consider the following:

- Charitable Contributions are not permitted when business decisions are pending between Johnson Controls and the beneficiary.
- The proposed contribution must never be intended to influence a decision related to Johnson Controls business.
- The proposed contribution must be consistent with Johnson Controls policies and values.

All in-kind donations, regardless of value, should be recorded on the Johnson Controls MyGiving Site via an [In-Kind Donations Form](#).

Scenario 1:

A charitable foundation associated with a public hospital in my town is hosting a charity golf tournament. We just bid on a big project at the hospital, so I'd like to sign up as a platinum sponsor of the event. It will cost us 9,000 USD to sponsor at that level, but that's a small investment compared to the size of the job, if we win it.

What should I do?

Because business decisions are pending between Johnson Controls and the hospital, this contribution would be prohibited. We must avoid even the appearance of acting improperly, and the timing here could make it look like we are trying to improperly influence the bid decision with our sponsorship.

If there wasn't an open bid, you would need Compliance pre-approval for the proposed contribution because the recipient is government affiliated (the foundation is affiliated with a public hospital). All contributions to government-affiliated organizations require Compliance pre-approval, regardless of value. As such, you would need to go to [Compliance Portal](#) to complete a Charitable Contribution form.

Scenario 2:

A well-regarded, private charitable organization is hosting a dinner to raise money for natural disaster relief in my region. My branch would like to sponsor a table and bring a few key customers as guests. The total cost will be 1,500 USD.

What should I do?

So long as there are no business decisions pending between Johnson Controls and the beneficiary and the contribution is not being made to influence a decision related to Johnson Controls business, this should be fine. Compliance pre-approval is not required unless the organization is government-affiliated in any way or the contribution amount exceeds 10,000 USD. Make sure to secure your supervisor's approval for all charitable contributions. Because you intend to bring customers to the event as guests, you'll need to be sure to consult the [Third-Party Gifts, Entertainment and Travel Policy](#).

Scenario 3:

I work for a charitable organization on the weekends. I want to ask Johnson Controls customers and suppliers for donations to support their work.

What should I do?

Requesting charitable contributions from Johnson Controls customers or suppliers may create a conflict of interest. It might look like you are using your position with the Company for personal benefit or that your decision-making could be influenced by whether or not the contributions are made. Plus, it might simply make our customers and suppliers uncomfortable. Please review Johnson Controls' [Conflict of Interest Policy](#) and reach out to askcompliance@jci.com with any questions.