



December 9, 2025

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VIA CERTIFIED MAIL, RETURN RECEIPT REQUESTED

Mr. Vimal Kapur, Chief Executive Officer
Honeywell International, Inc
855 S Mint Street
Charlotte, NC 28202

Re: Investigation of Potential Unlawful Discrimination in Honeywell-Sponsored Educational and Workforce Pipeline Programs

Dear Mr. Kapur:

The America First Policy Institute (AFPI) is investigating whether Honeywell International Inc. (“Honeywell”) may be violating federal nondiscrimination laws through scholarships and career-pipeline programs that appear to allocate benefits on the basis of race, color, or related protected characteristics. Our concerns arise from publicly available program descriptions, partnership agreements, and scholarship eligibility statements suggesting that Honeywell sponsors, funds, or administers programs that explicitly restrict eligibility to African American students or other racially defined categories in direct violation of federal nondiscrimination laws.

AFPI is a 501(c)(3) organization dedicated to advancing policies and litigation that put the American people first. AFPI’s guiding principles are liberty, free enterprise, national greatness, American military superiority, foreign policy in the American interest and the primacy of American workers, families, and communities.

As a federal contractor and recipient of federal funds, Honeywell is subject to the requirements of Title VI as well as Title VII, Title IX, the Equal Protection Clause, and the July 29, 2025 “Guidance for Recipients of Federal Funding Regarding Unlawful Discrimination” issued by Attorney General Pam Bondi. These authorities strictly prohibit the use of race, color, national origin, sex, or their proxies in any aspect of program design, hiring, or selection. (AG Guidance § IV(A)-(D)).

Based on AFPI’s initial examination of Honeywell’s publicly available information, the practices detailed below raise serious concerns of a potential violation:

I. The NSBE/Honeywell integrated pipeline program uses explicit racial eligibility criteria.

Honeywell’s co-sponsored NSBE/Honeywell Integrated Pipeline Program states that the program “aims to reduce the talent and representation gap among African American technical employment candidates” by preparing African American rising sophomore engineering students for engineering careers. The program materials explain that Honeywell provides financial resources, mentorship, and work-experience opportunities specifically for African American students.

A program whose purpose and eligibility criteria are expressly limited to African American students constitutes racial discrimination on its face. The Attorney General’s 2025 Guidance explicitly warns against the use of racial classifications in workforce-development programs, student pipelines, or scholarship-linked employment opportunities, whether administered directly or through a partner organization such as NSBE. (AG Guidance § IV(A)(1)-(2); § IV(B)(1); § IV(C)(3)).

Honeywell’s listing as an NSBE Corporate Sustainability Sponsor, with a \$60,000 minimum annual contribution for these programs, further suggests that Honeywell is financially supporting racially selective programming.

II. The Honeywell/BAS partnership scholarships are restricted exclusively to African American students

Honeywell, through the Black Achievers Society, offers two annual renewable \$5,000 scholarships “exclusively for African American students pursuing a bachelor’s degree in engineering or computer science.” Public materials confirm that only African American students may apply, and that previous recipients are limited to that racial group.

Making financial educational benefits available *exclusively* to African American students is a direct violation of Title VI and other federal anti-discrimination laws including Title VII, the Equal Protection Clause, and federal contractor obligations under Executive Order 11246. The Attorney General’s 2025 Guidance is unequivocal in warning that race-exclusive scholarships and benefits are unlawful, even when administered through nonprofit partners. (AG Guidance § IV(A)(1)-(2); § IV(C)).

These practices, as described, suggest that Honeywell may be engaged in direct preferential treatment on the basis of sex, race, and national origin. (AG Guidance § IV(A)-(C)). We therefore encourage Honeywell to provide additional information about these programs so that we may assess whether they are in compliance with federal non-discrimination laws.

To assist us in evaluating compliance, we request:

- (1) the eligibility criteria, selection procedures, and decision-making processes used for the NSBE/Honeywell Integrated Pipeline Program and the Honeywell/Black Achievers Society scholarship programs, including any guidance regarding the use of race or “representation gap” objectives;
- (2) all partnership agreements, funding arrangements, and pipeline-program materials involving NSBE, the Black Achievers Society, or any other organizations through which Honeywell sponsors race-restricted or race-targeted programming;
- (3) aggregate demographic data for recent applicant and recipient cohorts in these programs; and
- (4) any internal legal or compliance assessments conducted in response to federal nondiscrimination obligations or the July 29, 2025, Attorney General’s Guidance.

Thank you for your prompt attention to these serious compliance issues. Given Honeywell’s obligations as a federal contractor and recipient of federal funds, it is imperative that all internship, apprenticeship, and workforce-development programs operate in full alignment with federal nondiscrimination requirements.

We look forward to receiving additional information about the above programs. We also welcome your response detailing the steps Honeywell has taken to ensure that no program, partnership, or selection process confers unlawful preferential treatment based on protected characteristics or their proxies.

Please direct your responses to me at the address above. AFPI looks forward to your affirmative reply to this letter by December 31, 2025.

Sincerely,



Skylar McCann
America First Policy Institute