

An aerial photograph of a two-lane asphalt road that curves through a dense, lush green forest. The road is light gray and has a white dashed line down the center. The surrounding trees are vibrant green, with some hints of yellow and orange, suggesting early autumn. The lighting is bright, creating strong shadows and highlights on the foliage.

Our Code of Conduct

TRANE
TECHNOLOGIES™

Our Code of Conduct

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Our Code of Conduct

HOW TO USE

We refer to this version of our Code of Conduct as the PDF version. It contains all of the information found in the online version but is formatted for you to download & view for reference. *As always, consider the environment before printing.*

Here are a couple of tips for how to navigate the content of the PDF Code:

- **“I” Statements and FAQs:** To help you navigate the sometimes complex world of business ethics and compliance, we have minimized legal-speak in the Code and created a series of “I” statements for each topic area. The “I” statements describe the behaviors expected of every employee for each topic area. To supplement your understanding of the right behaviors, several Frequently Asked Questions are also included in each topic area.
- **Bold purple underlined** words or phrases are links to either a website or email address.
- **Bold purple** words or phrases are defined terms. You will find their definitions on the page(s) immediately following their first appearance.
- **Bold underlined** words or phrases are a signal that there is additional information, such as key contact lists or policies, available on Trane Technologies’ intranet.
- **Bold** words indicate that additional relevant information exists in other sections of the Code.

Our Code of Conduct

MESSAGE FROM DAVE REGNERY

Dear colleague:

At Trane Technologies, our Leadership Principles are the foundation of our business. The Leadership Principles define *what we stand for* as Trane Technologies and how we work. They apply to each one of us because, at Trane Technologies, everyone is a leader. Each of us must live these Leadership Principles and lead by example. Together, these Principles position each of us as leaders who are empowered to contribute to Trane Technologies' purpose to boldly challenge what's possible for a sustainable world. These Principles also strengthen the bond of trust we have with one another, our customers, suppliers, shareholders, and the communities in which we operate.

The Trane Technologies Code of Conduct describes the fundamental behaviors, rules and legal requirements that align with our Leadership Principles, and ensures we follow them in everything we do. All of us must be familiar with and adhere to our Code.

If you ever have a question or concern about an ethics or compliance issue, or any topic covered by our Code, promptly raise it. There are a variety of ways for you to do so; you will not suffer negative consequences for speaking up in good faith about a concern.

Thank you, in advance, for following the Code and sharing your voice. By doing so, you safeguard Trane Technologies' reputation for integrity and enable us to achieve sustainable progress into the future.

Sincerely,



Dave Regnery
Chief Executive Officer



Our Code of Conduct

INTRODUCTION

Welcome to Trane Technologies' Code of Conduct. Our Code defines how we interact with our customers and suppliers, how we treat each other in the workplace, and how our Leadership Principles guide our business decisions.

The essence of our Code of Conduct is simple:

1. We act **ethically** and in accordance with the law.
2. If we are unsure, we **ask**.
3. If something seems wrong, we **speak up**.

This Code applies to every **employee** regardless of role or location. And, while it can't possibly address every legal or ethical challenge you might encounter, it will certainly point you in the right direction.

It is our responsibility to protect the reputation of the company, our customers and each other. To do this we reference our Code of Conduct for information; look to our Leadership Principles to guide our actions; and speak up when we think something is wrong.

In some instances, our Code may establish a higher standard of conduct than what is required by law. However, if you ever believe that following a Code requirement will subject you or the company to legal liability under local law, consult with a member of the Legal department or the Ethics and Compliance Group immediately.

All employees must follow the rules and policies in this Code. As a general matter, waivers of the Code will not be granted. If and when a waiver is given, it must be in writing from the Vice President, Compliance, unless it is for executive officers or directors, in which case it must be granted by the Board of Directors or a Board committee.

Our Code of Conduct

INTRODUCTION

Definitions

ETHICALLY	We do the right thing. Our actions reflect our commitment to abide by both the letter and spirit of the law in all regions and areas of our business.
ASK	If you have a question about the Code or an ethics issue, seek guidance from your manager, another manager, Human Resources , the Legal department , a member of the <u>Ethics and Compliance Group</u> , or contact the <u>Ethics HelpLine</u> .
SPEAK UP	There are many ways you can speak up, ask questions, or report unethical conduct: <ul style="list-style-type: none">• Talk to your manager• Share your concerns with another manager• Consult with a member of the Human Resources or Legal departments• Contact a member of the Ethics and Compliance Group• Call the <u>Ethics Help Line</u>• Send an email to: <u>ETHICS@tranetechnologies.com</u>.
EMPLOYEE	Officers, employees and members of the Board of Directors (when they are acting in connection with their Trane Technologies-related duties) are referred to as “employees” in this Code.



PURPOSE

**Boldly challenge what's possible
for a sustainable world**

STRATEGIES

Innovate for our customers

Build a world class lean enterprise

Uplift our people, culture and communities

WE:

LEADERSHIP PRINCIPLES

Work today for a sustainable tomorrow

Keep customers at the heart of all we do

Include and uplift one another

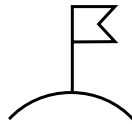
Make better happen

Dare to do things differently

Own our actions and decisions

Do what's right, always

LEADERSHIP
PRINCIPLES



We own our actions and decisions.

We are empowered to
act and bring solutions
to achieve extraordinary
results. We take initiative
and follow through.

LEADERSHIP
PRINCIPLES



We own our actions and decisions

ETHICAL DECISION MAKING: THE THREE QUESTIONS

As Trane Technologies employees, our decisions reflect integrity, accountability and transparency even in the most challenging circumstances. When we have to make a decision that doesn't have a clear answer, we pause, identify the heart of the issue, and take a disciplined approach to solve the problem.

To make the best decisions, we ask ourselves the following three questions:

QUESTION ONE: Is it legal?

- If yes, proceed to question two.
- If no, stop.

QUESTION TWO: Is it consistent with our Code of Conduct and our Leadership Principles?

- If yes, proceed to question three.
- If no, stop.

QUESTION THREE: Will it promote the company's reputation for integrity?

- If yes, then you have probably chosen the best path. Always consult with the **Ethics and Compliance Group** if you are unsure.
- If no, stop.

We know that integrity means more than just complying with the law. It means following our Code, living our Leadership Principles, and promoting a culture based on ethical conduct. By following these three-questions, we are able to:

- “See around corners” (anticipate consequences, obstacles and opportunities),
- Identify risks,
- Follow the rules,
- Share tough decisions, and
- Get help.



We own our actions and decisions

APPLYING THE THREE QUESTIONS

A Quick Case Study

One afternoon, you and a colleague are talking about the high cost of a certain material needed for the production of a Trane Technologies product. The two of you wonder what your biggest competitor is paying for the same material, so you decide to call the competitor and pose as a seller of the material so you can find out the cost...

Let's run this scenario through the "Three Questions"

QUESTION ONE: Is it legal?

In some places, impersonating another person may not be illegal; however, using the information you obtain thereafter may be.

QUESTION TWO: Is it consistent with our Code of Conduct and Leadership Principles?

Our Code and Leadership Principles tell us what we stand for and how we work, and while the idea may sound innovative, it lacks integrity on all accounts and is not the right thing to do because you are being deceitful.

QUESTION THREE: Will it promote the company's reputation for integrity?

How would this behavior look if it appeared as a headline in your hometown paper? "Local Trane Technologies Employees Pose as Vendors to Gain Intelligence on the Competition!" This is probably not the kind of headline that would create a positive impression of you or Trane Technologies.

So this plan did not pass the Three Question test. You and your colleague would be better off working with your Procurement team to ensure you are getting the very best possible price for the materials you need to make Trane Technologies products.

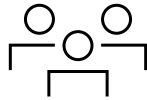


We own our actions and decisions

PENALTIES FOR VIOLATIONS

Employees who violate the Code may be subject to disciplinary action up to and including termination of employment (as consistent with applicable law). The following are examples of conduct that may result in discipline:

- Actions that violate a company policy, the Code of Conduct, or applicable law.
- Requesting, encouraging or permitting others to violate a company policy, the Code of Conduct, or applicable law.
- Failure to promptly report a known or suspected violation of the Code, law or regulation.
- Failure to cooperate fully and honestly with company investigators or auditors.
- Retaliation against another employee or third party for reporting a policy or Code violation in good faith or for cooperating with a company investigation.
- For managers and supervisors, failure to use reasonable care to prevent or detect a violation, or failure to demonstrate the leadership and diligence needed to ensure compliance with the Code or company policies.



We include and uplift one another.

We embrace differences
and value the opinions
and contributions of
each person.

We work collaboratively
to magnify our impact.

LEADERSHIP
PRINCIPLES

We include and uplift one another

EMPLOYEE RELATIONS

To sustain the company and protect its stakeholders:

- I treat my fellow employees with respect.
- I take an immediate stand against **all forms of discrimination or harassment**.
- I value the **differences** between my colleagues and me.
- I take a moment to think before I speak or act to help ensure my words or actions will not be misinterpreted.

We include and uplift one another

EMPLOYEE RELATIONS

Definitions

ALL FORMS OF DISCRIMINATION OR HARASSMENT	Harassment and discrimination are prohibited and may constitute illegal forms of employee misconduct whether committed by supervisors or nonsupervisory personnel. Discrimination and/or harassment can be based on race, sex, color, national origin, creed, ancestry, religion, pregnancy, age, disability, military/veteran status, sexual orientation, gender, gender identity, gender expression, genetic information, medical condition, marital status or any other classification protected by law. Harassment may include remarks, gestures or physical contact and the display or circulation of written materials, pictures, cartoons, posters, emails or jokes that may reasonably be deemed offensive. Harassment also includes requests for sexual favors and basing personnel decisions on an employee's response to sexually oriented requests.
DIFFERENCES	Our individual characteristics including backgrounds, personalities, preferences, perspectives, experiences, race, gender, cultural and ethnic heritage.

Related Policies:

- Equal Employment Opportunity Policy
- Global Human Rights Policy
- Harassment or Discrimination Policy and Procedures

We include and uplift one another

EMPLOYEE RELATIONS

Frequently asked questions

“Isn’t diversity just a U.S. issue? Why include it in the Code for a global company like Trane Technologies?”

Valuing and treating all global colleagues with dignity and respect is fundamental to who we are as a company. To make good decisions that allow us to serve our customers around the world, we need a broad spectrum of perspectives, skills, educational levels and backgrounds.

“My colleague is upset and tells me that a co-worker is constantly telling inappropriate jokes. She is afraid to speak up. What should she do?”

Your colleague should tell the co-worker that these jokes are offensive to her and ask the co-worker to stop, or she will report the behavior. If your co-worker does not stop, you should report what your colleague has told you to your manager or your **Human Resources** representative. These jokes do not appear to be appropriate for the professional, mutually respectful work environment Trane Technologies seeks to promote. Further, depending on the surrounding circumstances and applicable law, these jokes might even be viewed as potentially contributing to harassment. It is critical for the company to take steps to stop offensive or improper behavior immediately.

“One of my co-workers has a screen saver on her computer that displays images of men in revealing clothing. I told her it offends me and asked her to remove the screen saver. She says because it is in her office and not in a common area that it’s okay. Is she right?”

If the screen saver is offensive, your co-worker should not be displaying it, regardless of whether she sits in an office or a common area. As described, the screen saver in question appears to be inappropriate to a professional work environment. You can report your co-worker’s refusal to remove the screen saver to your **Human Resources** representative or the **Ethics HelpLine**. Similarly, if you are unsure whether particular material is truly inappropriate or offensive, consult with **Human Resources** and/or the **Legal department**.

“It is common during work for my co-workers to make jokes about certain races. Am I being overly sensitive when I ask them to stop?”

Humor is an important element of life, both inside and outside of the workplace. However, it is not acceptable to ridicule others based on their nationality, ethnicity or other differences, because it can be offensive and is not consistent with our Leadership Principles. Such behavior, even if not intended as an offense, is not acceptable. If you have asked your co-workers to stop and the jokes or comments continue, you should discuss the issue with your manager, **Human Resources** representative, **Ethics and Compliance lead**, or call the **Ethics HelpLine** for guidance.

We include and uplift one another

DRUG AND ALCOHOL ABUSE

To sustain the company and protect its stakeholders:

- I create a safe, healthy and productive work environment.
- I am free of the influence of alcohol and drugs when I report to work or perform any job duties.
- I do not sell, distribute, manufacture, solicit or transport drugs or alcohol on any company premises or using any company property.
- I conduct myself professionally at company-sponsored events and, when management has approved the serving of alcoholic beverages, I do not drink excessively or become intoxicated.

Related Policies:

- [Drug and Alcohol Policy](#)

We include and uplift one another

DRUG AND ALCOHOL ABUSE

Frequently asked questions

“Can the company require me to take a drug or alcohol test while I’m on the job?”

Our policy on drug testing varies by location. If tests are permitted by law or union contract, you may be required to submit to testing.

“I suspect that my co-worker is abusing prescription drugs. Since this is not an illegal substance, should I tell someone?”

Abuse of legally prescribed drugs can be as dangerous as abuse of illegal substances and can itself be a violation of the law in some places. Share your concerns with your supervisor, **Human Resources** representative or the **Ethics HelpLine**.

We include and uplift one another

PRIVACY OF PERSONAL INFORMATION

To sustain the company and protect its stakeholders:

- I **protect** customer and employee **personal information**, ensuring it is only **shared appropriately, securely** and in accordance with company policy and **local privacy laws**.
- I always secure my company-issued laptop and smartphone, understanding that theft or misuse of these assets can lead to the loss of **confidential information** and a **data privacy** breach.
- I use my company-owned and -issued resources without any expectation of privacy, except as permitted by **local privacy laws**.
- If I suspect a breach of personal data, I **report** it immediately.

Definitions

PROTECT	Take reasonable precautions to protect the security, confidentiality and integrity of personal and confidential information by any means necessary including the use of firewalls, restricted areas, strong passwords and encryption technology.
PERSONAL INFORMATION	Information that directly identifies an individual including name, address, social security number or other identifying number or code, telephone number, email address, or indirectly such as gender, race, birth date, geographic indicator and other descriptors. Information permitting the physical or online contacting of a specific individual is the same as personally identifiable information. Personal information can be maintained in either paper, electronic or other media forms.
SHARED APPROPRIATELY, SECURELY	Take reasonable precautions to protect the security, confidentiality and integrity of personal and confidential information by any means necessary including the use of firewalls, restricted areas, strong passwords and encryption technology.
LOCAL PRIVACY LAWS	The law in a given jurisdiction that governs the regulation, storage and use of personal information.
CONFIDENTIAL INFORMATION	Confidential information is any information that is owned by a person or business that, if revealed to unauthorized parties, could cause harm to the owner or place them at a competitive disadvantage. Confidential information may include: engineering drawings and specifications, wage and salary structure, employee personal information, company financial information, bookkeeping or office management procedures, customer lists, details of new products, research in progress and invention disclosures. also see the Confidential Information section of the Code.

We include and uplift one another

PRIVACY OF PERSONAL INFORMATION

Definitions

DATA PRIVACY	The protection of sensitive, protected or confidential data; may include personal health information, personally identifiable information, trade secrets or intellectual property.
REPORT	<p>There are many ways you can speak up, ask questions, or report unethical conduct:</p> <ul style="list-style-type: none">• Talk to your manager• Share your concerns with another manager• Consult with a member of the Human Resources or Legal departments• Contact a member of the Ethics and Compliance Group• Call the <u>Ethics Help Line</u>• Send an email to: ETHICS@tranetechnologies.com.

Related Policies:

- HIPPA Privacy Policy
- Data Protection & Privacy Policy
- Complaint Procedure Policy: European Supplement

Frequently asked questions

“Can the company search my email or laptop?”

There is no expectation of privacy when using company resources, unless local law provides otherwise. Trane Technologies issues company resources for business purposes. Company resources should only be used for Trane Technologies business. Therefore, in some circumstances, in order to ensure customer needs are being met or to investigate concerns, the company may access and review information found on company resources.

“Can the company share my personal information without my permission?”

Trane Technologies treats your personal information with the utmost confidentiality. Your personal information will only be used for legitimate business purposes, by people with a legitimate business need, and only when permitted by the company's privacy policies and local laws which differ from country to country.

“I need to report an ethical issue. Are there any special data privacy laws I need to know about? What if I live in the European Union?”

Employees in the U.S. and Canada may report known or suspected violations of the Code using the Ethics HelpLine at 1-844-9HELPTT. Employees in other locations will find a list of country-specific toll-free numbers on the [**Ethics HelpLine**](#) homepage. Employees may call anonymously except where restricted by local privacy laws, such as in the European Union. Where so restricted, the system will prompt you accordingly.

We include and uplift one another

POLITICAL ACTIVITIES AND CONTRIBUTIONS

To sustain the company and protect its stakeholders:

- I know that many countries have **specific rules** I must follow when engaging with a high-level government official. In these instances, I always seek guidance from a member of the **Government Affairs** team.
- My personal political activities are clearly separated from my professional responsibilities to Trane Technologies.
- I get permission from **Government Affairs** before using **Trane Technologies resources** for company-related **political purposes**.

We include and uplift one another

POLITICAL ACTIVITIES AND CONTRIBUTIONS

Definitions

SPECIFIC RULES	For example, in the U.S., any meetings conducted with high-level federal officials must be reported. Other countries may have their own requirements which is why it is important to contact the <u>Government Affairs</u> team when interacting with high-level government officials.
TRANE TECHNOLOGIES RESOURCES	Though rules vary from country to country, and from state to state in the U.S., Trane Technologies resources include company money, facilities (e.g., for plant tours or hosting special events), providing food, beverage or entertainment or making a charitable contribution linked to a federal official.
POLITICAL PURPOSES	Promotion or advocacy for public policy or political candidates, including hosting campaign events at company facilities.

Related Policies:

- Contact a member of the **Government Affairs** team for more information on rules governing political activities and contributions.

We include and uplift one another

POLITICAL ACTIVITIES AND CONTRIBUTIONS

Frequently asked questions

“A colleague has been spending his lunch hour visiting other employees and soliciting signatures on a petition for a local political candidate to qualify for the upcoming election cycle. Is this appropriate?”

No. While the company encourages employees to participate in political activities on their own time outside of working hours and off company property, soliciting signatures for a petition or carrying on other personal political activities on company property during working hours is prohibited. Not only is it disruptive to the workplace, but strict laws apply to corporate political activity, and personal political activities must not be perceived as being political activities carried out by Trane Technologies.

“I went to a fundraising dinner for a pro-business candidate for a local government office. This candidate takes positions favorable to Trane Technologies’ interests. Can I claim the dinner on my expense report?”

No. If you did this, it would be considered a political contribution. While you are free to attend political fundraising events as an individual, you must not use Trane Technologies assets or funds. If you have further questions about your involvement and whether it may create a conflict of interest or violate political activity laws or regulations, discuss it with the **Legal department** or the **Government Affairs** team. Also see the **Conflicts of Interest** section of the Code.

“A legislator’s assistant called me, a tax accountant, to ask me some questions about Trane Technologies’ opinion about tax legislation introduced by that legislator. The proposed legislation will directly impact Trane Technologies’ tax responsibilities in the jurisdiction. May I speak to this person?”

In situations like this, you should refer the caller to Trane Technologies’ **Government Affairs** Team.

We include and uplift one another

SOCIAL MEDIA

To sustain the company and protect its stakeholders:

- I know that anything I share via **social media** is instant, public and permanent.
- My **social media** posts reflect our Leadership Principles.
- I never use **social media** to **harass or discriminate** against anyone.
- I disclose that I am a Trane Technologies employee whenever I originate a post on **social media** that refers to Trane Technologies products, services or competitors.
- I immediately **report** the misuse of Trane Technologies-controlled **social media** sites.
- I do not disclose **confidential information** on **social media** because it could expose the company to great reputational and even legal risk.

We include and uplift one another

SOCIAL MEDIA

Definitions

SOCIAL MEDIA	<p>The posting of information on an internet web log (“blog”), journal, diary or website. Social media also includes any other form of posting information on the internet, such as postings on a personal website, social networking site (e.g., Facebook, YouTube, Twitter, LinkedIn, Instagram, Snapchat), wiki, newsgroup, bulletin board, video blog, chat room, micro-blog or app.</p>
HARASS OR DISCRIMINATE	<p>Harassment and discrimination are prohibited and may constitute illegal forms of employee misconduct whether committed by supervisors or nonsupervisory personnel. Discrimination and/or harassment can be based on race, sex, color, national origin, creed, ancestry, religion, pregnancy, age, disability, military/veteran status, sexual orientation, gender, gender identity, gender expression, genetic information, medical condition, marital status or any other classification protected by federal, state or local law. Harassment may include remarks, gestures or physical contact and the display or circulation of written materials, pictures, cartoons, posters, e-mails or jokes that may reasonably be deemed offensive. Harassment also includes requests for sexual favors and basing personnel decisions on an employee’s response to sexually oriented requests.</p>
REPORT	<p>There are many ways you can speak up, ask questions, or report unethical conduct:</p> <ul style="list-style-type: none">• Talk to your manager• Share your concerns with another manager• Consult with a member of the Human Resources or Legal departments• Contact a member of the Ethics and Compliance Group• Call the <u>Ethics Help Line</u>• Send an email to: ETHICS@tranetechnologies.com.

Definitions

CONFIDENTIAL INFORMATION

Confidential information is any information that is owned by a person or business that, if revealed to unauthorized parties, could cause harm to the owner or place them at a competitive disadvantage. Confidential information may include: engineering drawings and specifications, wage and salary structure, employee personal information, company financial information, bookkeeping or office management procedures, customer lists, details of new products, research in progress and invention disclosures. Also see the **Confidential Information** section of the Code.

Related Policies:

- [Social Media Policy](#)
- [Harassment or Discrimination Policy and Procedures](#)
- [Regulation Fair Disclosure Policy](#)
- Also see the section on **Confidential Information** of this Code

We include and uplift one another

SOCIAL MEDIA

Frequently asked questions

“I am a frequent visitor to one of the company’s social media forums. I have noticed several anonymous comments that are disrespectful to others. Is this appropriate?”

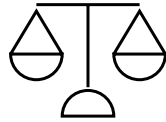
Absolutely not. All employees and guests must be transparent, honest and respectful when making use of the company’s social media forums. Making disrespectful or hateful comments is a violation of our Leadership Principles. If you witness any misuse of our company social media forums, report it immediately to a member of our **Communications department**.

“I want to create a new Trane Technologies-sponsored social media website for sector engineers to share and discuss design ideas and solutions. How do I go about doing this?”

You should contact a member of the **Communications department** for assistance. These resources can help you with branding concerns, content structure and development.

“I learned at a confidential meeting that the company is about to announce a new product launch to the market. I am excited and want to tell everyone about it on Facebook. Can I do this?”

No, unless you are specifically authorized to do so by senior leadership. Employees should not make announcements about any non-public company information. Also see the **Confidential Information** section of the Code.



**We do what's right,
always.**

We demonstrate integrity
and ethical behavior in
all we do. We have the
courage to speak up for
what is right.

LEADERSHIP
PRINCIPLES

We do what's right, always

SPEAK UP! RAISING ETHICAL ISSUES

Sometimes it can be difficult to speak up and ask for clarification or help, and challenging to report the unethical conduct of a colleague, manager, customer or supplier. Ideally, we'd have all the answers and wouldn't need to ask for help, and, everyone would play by the rules, so we wouldn't need to report concerns. But the truth is, none of us has all the answers and respectfully challenging and asking questions is an important part of our culture.

Fear of retaliation should never stop us from speaking up. Retaliation is punishing an employee for engaging in a protected activity, such as reporting harassment or other ethical violations, or for participating in a workplace investigation. Retaliation can include any negative action and is strictly prohibited by Trane Technologies. Verified instances of retaliation may result in disciplinary measures up to, and including, termination.

You should never attempt to investigate an actual or suspected instance of non-compliance on your own. If you become aware of unethical conduct, report it immediately. There are many channels for you to report concerns or ask questions:

1. Talk to your manager.
2. Share your concerns with another manager.
3. Consult with a member of the **Human Resources** or **Legal** departments.
4. Contact a member of the **Ethics and Compliance Group**.
5. Call the **Ethics HelpLine**.
6. Send an email to ETHICS@tranetechnologies.com.

Related Policies:

- **Harassment or Discrimination Policy and Procedures**

Frequently asked questions

“What should I do if my manager asks me to do something that I think is wrong?”

We are trusted to use our best ethical judgment in the actions we take on behalf of the company. If you are told to do something that you believe is wrong, take time to evaluate the situation based on your knowledge of our Leadership Principles. A first course of action may be to read through the Code again. Secondly, you may wish to express your concerns to your Human Resources or Legal department representative, or directly to your manager. Express your concerns openly and honestly. If you prefer, you can always contact the Ethics HelpLine or any of the other resources discussed in this section. After following these steps, if you still believe that what you have been told to do is wrong, do not do it.

“My business sets various goals that we are supposed to achieve. Sometimes I feel pressured to violate the Code to achieve these goals. Is this acceptable?”

No. While successful businesses often set high goals and strive to achieve them, you should never violate the law, the Code of Conduct or other Trane Technologies policies to achieve company goals.

We do what's right, always

NON-RETALIATION

To sustain the company and protect its stakeholders:

- I never take **retaliatory actions** against anyone who reports a Code or policy violation or participates in an investigation.
- I actively contribute to a safe, productive and respectful work environment.
- I **speak up** promptly if I suspect a Code or policy violation has occurred.
- I talk to my manager, another manager, a member of the **Human Resources** or **Legal** departments, my **Ethics and Compliance Group** lead, call the **Ethics HelpLine** or send an email to ETHICS@tranetechnologies.com when I have questions or to report an issue.

Definitions

RETALIATORY ACTIONS	Retaliation is punishing an employee for engaging in a protected activity such as reporting ethical violations in good faith, or for participating in a workplace investigation . Retaliation can include any negative job action and is strictly prohibited by Trane Technologies. Verified instances of retaliation may result in disciplinary measures up to, and including, termination.
SPEAK UP	<p>There are many ways you can speak up, ask questions, or report unethical conduct:</p> <ul style="list-style-type: none">• Talk to your manager• Share your concerns with another manager• Consult with a member of the Human Resources or Legal departments• Contact a member of the Ethics and Compliance Group• Call the Ethics Help Line• Send an email to: ETHICS@tranetechnologies.com.

Related Policies:

- Harassment or Discrimination Policy and Procedures
- Investigations process on the BOS
- Also see the **Legal Proceedings** section of this Code.

Frequently asked questions

“My coworker says that since she named our manager in a report to the Ethics Helpline, he has stopped inviting her to important meetings that she needs to attend to do her work. Could his behavior be a form of retaliation?”

If true, his actions could be a form of retaliation. Retaliation is punishing an employee for engaging in a protected activity such as making a complaint regarding an ethical violation, or participating in a workplace investigation. Retaliation can include any negative action and is strictly prohibited.

“What if I’m not certain that what I witnessed or experienced was retaliation?”

Speak up and/or report the incident anyway. Allow the company the opportunity to promptly investigate to determine if there has been retaliatory conduct.

“How do I report an incident of retaliation or workplace misconduct such as a Code violation, discrimination or harassment?”

There are many ways you can speak up, ask questions or report unethical conduct:

1. Talk to your manager.
2. Share your concerns with another manager.
3. Consult with a member of the Human Resources or Legal departments.
4. Contact a member of the Ethics and Compliance Group.
5. Call the Ethics HelpLine.
6. Send an email to ETHICS@tranetechnologies.com.

We do what's right, always

CONFLICTS OF INTEREST

To sustain the company and protect its stakeholders:

- I act in Trane Technologies' **best interest** and avoid even the **appearance** of a **conflict of interest**.
- I promptly **disclose** all actual or potential conflicts of interest to my manager, who will then consult with the **Ethics and Compliance Group** as necessary for resolution. If I am unsure whether or not my relationship could cause a conflict of interest, I contact my manager or the **Ethics and Compliance Group** for advice.
- The decisions I make on behalf of Trane Technologies are not influenced by my **personal relationships** or how I might **benefit** from them either directly or **indirectly**.
- I am loyal to Trane Technologies and avoid any conflicts of interest with suppliers, customers and competitors, including participating, directly or indirectly, in activities that compete with the company or deprive it of business.
- I maintain professional relationships with business partners and suppliers and do not accept gifts, entertainment or other benefits from them that could be perceived as **excessive**, or influencing the impartiality of my decision-making on behalf of Trane Technologies.
- I respect Trane Technologies and use the company logo, name, resources, business opportunities and other **assets** for legitimate business purposes only.
- I respect Trane Technologies and use the company logo, name, resources, business opportunities and other assets for legitimate business purposes only.
- I know that **outside business interests and employment** - especially during the Trane Technologies workday may raise serious questions about conflicts of interest, so I immediately **disclose** my participation in any of these activities
- I do not hire or supervise **family members** or close friends.
- When I learn about a new business opportunity, in the course of my daily work for Trane Technologies, I always present that opportunity to the company **first** before pursuing it myself.

Definitions

BEST INTEREST	As an employee, your first responsibility is to Trane Technologies. Activities that might indicate that you are not acting in Trane Technologies' best interest are those that influence or appear to influence your judgment when carrying out your job responsibilities.
APPEARANCE	Even if there is no actual conflict of interest, consider how the situation could be perceived by an outsider.
CONFLICTS OF INTEREST	Can take many forms, but occur when you put your personal, social or financial interests before the best interests of the company. Trane Technologies seeks to avoid even the appearance of a conflict of interest not only actual conflicts.
DISCLOSE	Trane Technologies requires employees to disclose known or suspected conflicts of interest to their manager and/or the <u>Ethics and Compliance Group</u> . Information for how to properly disclose a conflict can be found on the <u>Conflicts of Interest site</u> .
PERSONAL RELATIONSHIPS	Include those with family members and close friends.
BENEFIT	Includes any cash, cash equivalent, voucher, gift, service, advantage, employment, discount, domestic or foreign travel, hospitality, accommodation, sponsorship, other incentive or valuable consideration.
INDIRECTLY	Means via distributor, dealer, agent, consultant, other intermediaries, subcontractor, service provider, or any individuals (e.g. family members, close friends).
EXCESSIVE	Means that the value of the gift and/or entertainment that you are being given exceeds Trane Technologies' limits or could be perceived as being given to you in an attempt to win a competitive advantage. Refer to the <u>Gifts and Entertainment</u> section of our Code for more information.

Definitions

ASSETS	<p>Products and components, but also:</p> <ul style="list-style-type: none">• Company name and logos• Business opportunities• Patents, copyrights and trade secrets• Confidential information• Technology• Data• Hardware and software• Tools• Vehicles• Land• Buildings• Equipment• Components• Raw materials (including scrap and obsolete materials)• Company credit cards• Company procurement cards ("P-cards")• Cash• The use of email, telephone calls, voicemail and text messages on Company-issued devices such as laptop computers, iPads and other tablet computers, mobile telephones and smart phones including Blackberries, iPhones, Android phones and other similar phones.
OUTSIDE BUSINESS INTERESTS AND EMPLOYMENT	<p>Any investment, interest, association, relationship or other outside business activity that interferes or appears to interfere with your ability to act in the company's best interest.</p>

Definitions

FAMILY MEMBERS	Includes a spouse, child, brother, sister, parent, stepchild, stepparent, as well as mother-, father-, son-, daughter-, brother-, or sister-in-law, or a grandparent, aunt, uncle, niece, nephew or cousin of yours or your spouse, and any other person living with you, except tenants and household employees.
FIRST	Trane Technologies must first decline to pursue the new business opportunity and expressly agree that you, a family member or close friend may do so. Of course, the new opportunity may not violate any other Conflict of Interest principle.

Related Policies:

- [Conflicts of Interest Policy](#)
- [Conflicts of Interest Site](#)

Frequently asked questions

“My family member works for a potential supplier that Trane Technologies is seeking to use. Is this a conflict of interest?”

This situation could be a problem if your job puts you in a position of selecting your family member's company as a supplier, or even after being selected, if you have to deal with that company on behalf of Trane Technologies. Sometimes distant relatives or close friends could influence or appear to influence your objectivity. You should first disclose the situation to your manager and the Ethics and Compliance Group by following the instructions on the **Conflicts of Interest site**. Your manager will determine, in consultation with the Ethics and Compliance Group as necessary, the best way to handle the situation. At a minimum, you will be required to excuse yourself from participating in any decisions or negotiations with the supplier.

“I own an online graphic design business. I think I could save Trane Technologies money by providing printing services for brochures and pamphlets. Is this okay?”

Maybe. This is a potential conflict of interest situation because it suggests at least the appearance that you might be more interested in expanding your side business than in serving Trane Technologies' best interests. You must disclose the situation to your manager and the Ethics and Compliance Group. If your Trane Technologies duties include selecting printing suppliers, you will need to withdraw from any decision relating to your business. Beyond that, however, there might be an opportunity if your printing company provides the right service at the right price, and if no other conflict or legal issues emerge.

In addition, you must avoid all second jobs or side businesses that require work be performed during your Trane Technologies workday, or which interfere with your performance at Trane Technologies (for instance, by causing you not to get sufficient rest to perform your Trane Technologies duties). If your online business demands your attention during work hours, you should resign from your outside role. If you have any questions, contact your manager or the **Ethics and Compliance Group** to discuss the situation.

Frequently asked questions

“I am a sales engineer for Trane Technologies. May I start a second job selling other companies’ HVAC spare parts, including competitors, to my current customers during my spare time?”

This is not an appropriate second job. You are not allowed to compete against Trane Technologies. You are prohibited from using company property or information—such as customer lists or pricing—for personal gain or to compete with Trane Technologies. Here, customer information is Trane Technologies’ confidential information. You should report your customers’ potential sourcing needs to your manager.

If you want to start a second job, contact the **Ethics and Compliance Group** for guidance to make sure you are not inadvertently competing with Trane Technologies. Remember, any second job should not impact your ability to perform your job with Trane Technologies. You must avoid all second jobs or side businesses that require you to perform work during your Trane Technologies workday or use Trane Technologies resources.

“What if I am invited to attend an industry conference and all my travel and hotel expenses will be paid by a vendor or supplier?”

In this situation, the way our vendors are selected to ensure best quality, price and service could be jeopardized. Your manager or SBU/function leader should decide whether it is appropriate for someone from Trane Technologies to attend this conference and, if so, who should represent Trane Technologies. In general, an industry conference fee may be waived, discounted, or paid by the conference sponsor or supplier without creating the appearance of a conflict.

However, Trane Technologies should not accept this invitation during a period of active or anticipated bidding from the supplier. Additionally, you may not accept gifts of commercial transportation, lodging, or other travel-related expenses from a supplier, as these will raise serious conflicts questions. If there is a legitimate business purpose for you or someone from Trane Technologies to attend the conference and a manager approves, Trane Technologies should pay for the travel and hotel expenses. You should report the invitation to your manager for guidance, who will consult with the **Ethics and Compliance Group** as needed.

Frequently asked questions

“My relative applied for a job with Trane Technologies. Do I need to disclose it?”

Yes. In general, you need to disclose situations in which Trane Technologies job applicants, employees, suppliers or potential suppliers are your family members or close friends. You should not be involved in the applicant evaluation process or hiring decision. Always follow the disclosure process on the [Conflicts of Interest site](#).

Employees should not supervise, be under the supervision of, or be in a position to influence the salary, performance evaluations, or conditions of employment, or the expense report of a family member or close friend.

“My close friend owns a company that sells a competitor’s products, but my role and responsibilities do not cover those products. Do I need to disclose my relationship? Also, the same friend asked me to be a passive owner of the company. Can I do that?”

The first situation is probably okay, but if your close friend requests you to provide him/her our company information such as pricing or a marketing strategy, you must not do it. In order to be completely transparent and have the situation properly considered, especially since your close friend’s company may be in competition with Trane Technologies, you should disclose your relationship to the Ethics and Compliance Group and your manager by following the procedure outlined on the [Conflicts of Interest site](#). Additionally, you should avoid having any business involvement, even if it is passive, with the competitor.

“My neighbor asked me to do some work on his house this weekend. May I bring home the tools that I use at work or use the tools from my company van?”

No. Company vans, tools and equipment are to be used only for business purposes.

We do what's right, always

ANTI-BRIBERY AND CORRUPTION

To sustain the company and protect its stakeholders:

- I enhance and protect our reputation through my commitment to win and award business only on the merits; I never pay, offer, authorize or accept **bribes**. Never.
- I place integrity above any business opportunity, walking away from any business or sale that cannot be won without a **bribe**.
- I do not give or offer **anything of value**—using Trane Technologies' money or my own—to anyone for the purpose of influencing a business decision or **official action**, or otherwise getting a **business advantage**.
- I do not make **facilitating payments** to government officials.
- I make sure that visits by customers or other third parties to our factories, facilities or events follow the Trane Technologies **Customer and Other Business Guest Travel Policy**, have a legitimate business purpose, include **appropriate attendees** and do not include **excessive travel or entertainment/hospitalities** or side trips to tourist or leisure locations.
- I protect Trane Technologies' reputation for integrity by following the company's **process for vetting** the business partners with whom I work.
- I accurately record and describe legitimate business expenses I incur.
- I follow the Code's rules concerning **Gifts and Entertainment**, as well as the company's **Anti-bribery and Corruption Policy** and **Global Travel & Expense Reimbursement Policy**.
- If I suspect bribery or corrupt activities have taken place, I **report** my concerns immediately.

Definitions

BRIBES	<p>A bribe, also known as an improper payment, is anything of value offered, given, promised, or authorized to someone in exchange for a business advantage. Bribes include things of value that are asked for or received. Things of value given to family members of the person whom one is trying to influence are also bribes. Bribery damages Trane Technologies' reputation with shareholders, customers, suppliers, regulators and the communities in which we do business. Refer to the Trane Technologies <u>Anti-bribery and Corruption Policy</u> for more information and guidance.</p>
ANYTHING OF VALUE	<p>Is defined very broadly to include more than just money or its equivalents (e.g., cash, stocks, gift cards, debit cards, traveler's checks). Anything of value also includes gifts, meals, entertainment, favors, travel, services, loans, loan guarantees, the use of property or equipment, job offers, transportation, political contributions, charitable donations or sponsorships, discounts and the payment of expenses or debts.</p> <p>There is no minimum value required for something of value to be a bribe. Anything, no matter how small or seemingly insignificant, can be a bribe depending on the facts and circumstances.</p>
OFFICIAL ACTION	<p>Actions by government officials or agencies regarding legislation, regulations, legal rulings, or other government actions that would benefit Trane Technologies.</p>

Definitions

BUSINESS ADVANTAGE	Is defined broadly and includes more than winning a contract, order or new project. A business advantage includes things that benefit Trane Technologies' business interests, whether sales, strategy, market positions, the cost of doing business. For example, a business advantage includes securing or preventing actions such as legislation, regulations, or legal rulings, obtaining or renewing a permit or license, or favorable tax rates or tax rulings.
FACILITATING PAYMENTS	Also known as grease payments, are payments of a small amount made to a government official or employee to obtain the performance of some routine, non-discretionary governmental action, such as providing mail service, turning on power service, connecting telephone lines or water service, or processing visas. Trane Technologies prohibits facilitating payments, as do most anti-corruption laws around the globe.
APPROPRIATE ATTENDEES	People with a legitimate business reason for participating in a visit.
EXCESSIVE TRAVEL OR ENTERTAINMENT/ HOSPITALITIES	Any entertainment or hospitality that is lavish, frequent, not customary or intended to improperly influence someone can be excessive. Consult the <u>Ethics and Compliance Group</u> for help determining if entertainment you are considering is excessive.

We do what's right, always

ANTI-BRIBERY AND CORRUPTION

Definitions

REPORT

There are many ways you can speak up, ask questions, or report unethical conduct:

- Talk to your manager
- Share your concerns with another manager
- Consult with a member of the Human Resources or Legal departments
- Contact a member of the Ethics and Compliance Group
- Call the **Ethics Help Line**
- Send an email to:
ETHICS@tranetechnologies.com.

Related Policies:

- **Anti-bribery and Corruption Policy**
- **Global Travel & Expense Reimbursement Policy**
- **Customer and Other Business Guest Travel Policy**
- **Conflicts of Interest Policy**
- Also see the **Business Partner Vetting** section of this Code
- Also see the **Gifts and Entertainment** sections of this Code

Frequently asked questions

“I’m working with a customer to upgrade its HVAC systems in several facilities. During several meetings we have had with a new executive, he has suggested that if Trane Technologies wants to keep his company’s business, I will need to make sure to think of him and sweeten the deal for him. I was not sure what he meant. Then, at a recent meeting, he said I should make sure he gets a \$50,000 personal bonus for this project and, if I do not, his company will not continue to use Trane Technologies’ products. This is a significant customer whose loss will really hurt our financial performance for the year. What should I do?”

Certainly, we cannot honor this executive’s request. You should walk away from any deal or sale — no matter how significant — if we cannot win the deal or sale without a bribe. Immediately talk to your manager and the **Ethics and Compliance Group**. It does not matter whether this executive is a government official or employee. The value of the bribe does not matter either. All that matters is whether your purpose is to influence a business advantage or decision in Trane Technologies’ favor. Remember, always consider the value of the thing of value from the point of view of the recipient and always avoid the appearance of impropriety.

“My team has submitted a bid to manufacture and install chillers for a public university in Europe. Several members of the university’s procurement team asked us to organize and pay for a trip to the United States to visit a Trane Technologies chiller plant and view product demonstrations. I have put together a great three-day agenda packed with plant tours, demonstrations, and meetings with the sales and engineering team to showcase our chillers’ capabilities. The procurement team also asked to stop in New York City to do some shopping and catch the latest hit Broadway musical. The senior member of the university’s procurement team hinted to me that it would be really thoughtful of Trane Technologies to cover the costs of their visit to New York City and the costs of their spouses to participate in this visit to the United States. This does not seem right to me but I’m not sure what to do. We really need this sale.”

You cannot comply with the customer’s requests and you should alert your manager and the Ethics and Compliance Group for help with how to handle this situation. There are three issues: (1) the university employees are considered to be government officials because they work for a public university; (2) the requested travel to New York City with no apparent, legitimate business purpose; and (3) the request for Trane Technologies to pay for the two days in New York and for the spouses of the procurement team to go on the trip. The portion of the proposed trip for these government officials to visit our chiller plant for the plant tours, demonstrations and meetings is permissible, assuming it involves reasonable travel, accommodations and meal expenses, because it is related to the promotion or demonstration of company products and services. However, the remainder of the trip—the two days in New York City—has no connection to the promotion or demonstration of company products or services. The New York City portion of the visit creates the perception that you may be trying to bribe the university procurement team to award the contract to Trane Technologies. This is against Trane Technologies’ Leadership Principles and policies. Additionally, the New York City portion of this trip carries legal risks, including more dire consequences for Trane Technologies and its employees where bribery of government officials or employees is concerned.

We do what's right, always

ANTI-BRIBERY AND CORRUPTION

The company must not incur or reimburse the costs of these types of side trips. Additionally, Trane Technologies will not pay for the travel, lodging, meals or entertainment of the spouses, other family members or close personal friends of our business guests.

Always follow the Trane Technologies Customer and Other Business Guest Travel Policy and submit proposed visits for review by the Ethics and Compliance Group.

“A member of a government procurement team for a project on which Trane Technologies is bidding is also on the Board for a local charity that runs several orphanages. She has asked for a donation to help build new soccer fields. I think this would be a nice gesture of goodwill because one of the charity’s orphanages is in the community where our local office is located. Can I recommend that we make this donation to the charity?”

No, you should not recommend that we make the donation. While, under other circumstances, this donation might be entirely appropriate (if approved at the proper levels within the company), here there is a problem because one of the charity’s board members is also going to be involved in making a decision about which company will win the government project. The donation to the charity could be viewed as an attempt to improperly influence the charity’s board member into awarding the project to Trane Technologies. Even if your intentions are innocent, you must avoid even the appearance of impropriety, which can lead to legal risk.

“I recently took on a new role as the plant manager for our new manufacturing facility in Asia. Some of our senior business leaders are coming to tour the plant’s progress next month. I am stressed about this visit because the local municipality still has not turned on our water or electricity, even though we requested these services be turned on two months ago. A friend suggested I make a small payment to the people at the municipal water and electric companies so I can get these services turned on in time for the visit. Is it okay for me to make these payments?”

No, Trane Technologies prohibits these types of payments, which are known as facilitating payments. Facilitating payments are small payments made to a government official or employee to get that person to perform some routine, non-discretionary governmental action. Paying a government official or employee to turn on water or electrical service might be permissible under some anti-corruption laws, but doing so is illegal in most countries where Trane Technologies operates. Thus, the company prohibits facilitating payments.

We do what's right, always

GIFTS AND ENTERTAINMENT / HOSPITALITIES

To sustain the company and protect its stakeholders:

- I never give lavish gifts to customers because they may be viewed as **bribes**; nor do I accept lavish gifts from suppliers because they, too, could be viewed as **bribes**.
- I follow Trane Technologies' **gift limits** and **give** and accept only occasional, modest gifts intended to promote good will and positive relationships.
- I avoid offering or accepting any gifts during a period of competitive bidding or at any time if the gift is part of an agreement to obtain a business advantage.
- I never give or accept cash or cash equivalents or anything that is illegal or inappropriate.
- I use extra caution when thinking about giving gifts or providing entertainment/hospitalities for **employees of government agencies or government-controlled entities**.

Definitions

BRIBES	A bribe, also known as an improper payment, is anything of value offered, given, promised, or authorized to someone in exchange for a business advantage. Bribes include things of value that are asked for or received. Things of value given to family members of the person whom one is trying to influence are also bribes. Bribery damages Trane Technologies' reputation with shareholders, customers, suppliers, regulators and the communities in which we do business. Refer to the Trane Technologies <u>Anti-bribery and Corruption Policy</u> for more information and guidance.
GIFT LIMITS	US\$100 unless the <u>Ethics and Compliance Group</u> designates a different amount for your region or SBU.
GIVE	When possible, give gifts that directly promote Trane Technologies products or have the company logo on them.
EMPLOYEES OF GOVERNMENTS OR GOVERNMENT-CONTROLLED ENTITIES	<ul style="list-style-type: none">• Officers, employees, or agents of government agencies or government-controlled entities.• Employees or agents of public international organizations.• Officials of political parties or candidates for political office.• Consult with the <u>Ethics and Compliance Group</u> with any questions.

Related Policies:

- **Customer and Other Business Guest Travel Policy**
- **Gifts and Entertainment Policy**
- **Conflicts of Interest Policy**
- **Anti-bribery and Corruption Policy**
- Also see the **Government Procurement** section of this Code.

Frequently asked questions

“What should I do if I receive a gift that exceeds the US\$100 limit?”

An unsolicited gift that exceeds the limits of your region or SBU can be returned with a note expressing thanks but explaining our **gift policy**. If returning the gift is not possible or would be considered discourteous, then the thank-you note and explanation can be sent and the gift disposed of in a transparent manner. For example, the gift may be donated to a charitable organization, awarded in a raffle, or, if it consists of perishable food items, shared with members of your department. If you're not sure what to do, contact the **Ethics and Compliance Group** for guidance.

“I attended an industry meeting and won a weekend trip, the value of which exceeds the gift limit of my region. Can I accept the prize?”

If the prize is given during a random drawing that is open to all participants, you may accept it even if it exceeds the normal gift limit.

“Can I accept tickets from a supplier to a sporting event?”

With your manager's approval, you may attend a sporting event or other entertainment in the company of the supplier. This kind of business entertainment is not subject to Trane Technologies' gift limits as long as it is:

- Infrequent;
- Not extravagant;
- Consistent with normal business practice for your region and business;
- Not during a period of active bidding; and
- Not part of an agreement to obtain a business advantage.

If a representative of the host company does not personally accompany you, this is a gift subject to the more stringent gift policy rules.

“My business team wants to invite customers to our facilities to better understand our products. Are customer visits subject to the gift rules?”

Although customer visits are not considered “gifts” all customer visits that are paid for by Trane Technologies, whether directly or indirectly, must follow the Trane Technologies **Customer and Other Business Guest Travel Policy**. The itinerary, including the business purpose and any related entertainment, must be approved by the appropriate business manager, and, if visitors are employees of government agencies or government-controlled entities, additional certifications, and written approval from the **Ethics and Compliance Group** are required.

Frequently asked questions

“Do all government agencies have the same regulations concerning the acceptance of gifts, meals and entertainment/hospitalities?”

No. Regulations differ among countries and even within the same country. Before you offer gifts or entertainment/hospitalities to employees of government agencies or government-controlled entities, make sure that you comply with all local rules. When in doubt, contact the **Legal department** or the **Ethics and Compliance Group** for guidance.

“May I give my boss an authentic jersey of her favorite football team?”

It depends on the circumstances. In general, you may not give gifts, or solicit donations to buy gifts, for persons above you in your reporting chain due to conflicts of interest concerns.

There are a few exceptions:

- Gifts given or exchanged outside work based on a personal relationship.
- Gifts (not cash) of nominal value on occasions when gifts are customary.
- Gifts given on special, infrequent occasions such as a marriage, birth or adoption, illness, transfer, or retirement. If donations are sought for gifts on such occasions, they must be voluntary.

We do what's right, always

BUSINESS PARTNER VETTING

To sustain the company and protect its stakeholders:

- The **business partners** I work with share Trane Technologies' commitment to integrity and ethical conduct.
- I instruct my business partners to walk away from business if winning or keeping that business requires bribing someone.
- I follow the **Business Partner Vetting Policy** and submit all potential business partners to the **Ethics and Compliance Group** for due diligence review and approval before hiring them.
- I expect my business partners to represent Trane Technologies ethically, honestly and within the law - all of which serves to protect our reputation. I actively watch for **red flags or warnings signs** of corrupt behavior.
- I notify my manager and the **Ethics and Compliance Group** immediately if I have concerns that a business partner may be paying **bribes**, directly or indirectly, to win or keep business.
- I care about Trane Technologies' reputation for integrity and only use business partners to conduct business that is legal and in keeping with Trane Technologies' Leadership Principles.

Definitions

<p>BUSINESS PARTNER</p>	<p>For purposes of the Business Partner Vetting Policy a business partner is a third-party intermediary who is not an end-customer or end-user who helps Trane Technologies sell its products or provides functional services that help Trane Technologies do business around the globe. Business partners include sales agents and consultants; dealers; distributors; resellers; installers; integrators; mechanical contractors; engineering, procurement and construction (EPC) contractors; design institutes; engineers or engineering firms; architects or architectural firms; customs brokers; customs agents; freight forwarders; visa or immigration documents vendors, processors, or agents; license, registration, or permit vendors; tax advisors, agents, or consultants; law firms; attorneys; accountants; accounting firms; auditors; lobbyists; lobbying firms; environmental consultants; any service provider who will interact with a government entity or government official on Trane Technologies' behalf or who a government official or government entity requires, designates, or recommends Trane Technologies use. If you do not know if a person or entity is a business partner and requires vetting, contact your regional <u>Ethics and Compliance Group</u> partner for help.</p>
<p>RED FLAGS OR WARNING SIGNS</p>	<p>Red flags are warning signs you should watch for when considering hiring a new business partner and when monitoring ongoing relationships with current business partners. A red flag should always trigger your concern, and you should bring the red flag to the attention of the Ethics and Compliance Group for appropriate review. Examples of red flags related to businesspartners include:</p> <ul style="list-style-type: none">• A request that a commission be paid in cash, in another name, or to an address or bank account in another country.• Unexplained large expenses on a travel and entertainment expense report.

Definitions

<p>RED FLAGS OR WARNING SIGNS (cont'd)</p>	<p>Red flags are warning signs you should watch for when considering hiring a new business partner and when monitoring ongoing relationships with current business partners. A red flag should always trigger your concern, and you should bring the red flag to the attention of the Ethics and Compliance Group for appropriate review. Examples of red flags related to business partners include:</p> <ul style="list-style-type: none">• A request that a commission be paid in cash, in another name, or to an address or bank account in another country.• Unexplained large expenses on a travel and entertainment expense report.• An agent or distributor demanding a higher than normal commission for a transaction.• Any agent or salesperson who says he or she is working with a government official to give our company the contract.• An agent or distributor who has a criminal conviction or a civil judgment involving fraud. <p>You can find a list of red flags on the <u>Business Partner Vetting</u> site. This list is not exhaustive; there may be other things or characteristics that might cause you concern and require additional due diligence of a business partner.</p>
<p>BRIBE</p>	<p>Anything of value offered, given, promised, or authorized to someone in exchange for a business advantage. Bribes include things of value that are asked for or received. Things of value given to family members of the person one is trying to influence are also bribes. Bribery damages Trane Technologies' reputation with shareholders, customers, suppliers, regulators, and the communities in which we do business. Refer to the Trane Technologies <u>Anti-bribery and Corruption Policy</u> for more information and guidance.</p>

Related Policies:

- **Anti-bribery and Corruption Policy**
- **Business Partner Vetting Policy (SIC 15.2B)**
- **Gifts and Entertainment policy**

We do what's right, always

BUSINESS PARTNER VETTING

Frequently asked questions

“One of our dealers always seems to win projects for us right at the last minute even though there was a lot of competition for the projects and sometimes the dealer’s bids are not as well-prepared or competitive as they could be. As long as I don’t know the details about what our dealer is doing to win these projects, everything’s okay...right?”

No. Neither you nor Trane Technologies can do through a dealer (or any other business partner) what you or the company are not allowed to do directly. Moreover, ignoring this dealer’s behavior and these red flags does not protect you or the company and instead exposes you and Trane Technologies to potential legal liability. If you reasonably suspect improper conduct by a business partner, you have an obligation to report the issue. Here, you should alert your manager and the **Ethics and Compliance Group**. Hiring the right business partners who share Trane Technologies’ commitments to integrity and ethical behavior and monitoring how our business partners conduct business on our behalf is the right way to do business. Conducting due diligence on our business partners is important.

“I work with a sales agent who will receive a 10% commission if Trane Technologies wins a sales contract with a Chinese government-owned oil company. During negotiations with the government, the agent tells me that he will need a higher commission to win this contract but he does not explain why. The agent will not be performing any additional work or providing additional services that justify the higher commission. Should I approve his higher commission request?”

You should refuse the agent’s request and contact your manager, the **Ethics and Compliance Group** or the **Legal department** immediately. Here, you are in the middle of trying to win business with a government-owned company. The sales agent’s request for a higher commission with no explanation and no evidence of additional work to justify the additional commission is suspicious. Your sales agent may be trying to get extra money to pay a bribe to someone who works at the Chinese government-owned company to award the contract to Trane Technologies. If this is the agent’s plan, you need to instruct the agent to walk away from the deal and remind the agent of Trane Technologies’ commitment to integrity and doing business ethically. Here, the **Ethics and Compliance Group** and your manager can help you have a discussion with the agent about why his behavior is unacceptable. You, your manager and perhaps additional leaders in your business will also need to reevaluate whether Trane Technologies should continue to do business with this agent.

“The national oil company in the emerging market I cover in Latin America is building a new facility. We have been working hard to position ourselves as a competitive, strategic choice with the right solution of products and services for the oil company. After a recent sales meeting, one of my employees pulled me aside and explained that one of the customer’s procurement representatives has been pushing her to work with a particular distributor because the oil company has a long-standing relationship with this distributor. We have our own distributor who usually works with us on these types of projects. What should I tell my employee?”

The pressure to use a particular distributor is a warning sign or red flag. It is possible that this procurement representative wants us to use a particular distributor because that distributor is willing to pass on bribes to help win this sale. The presence of a red flag, or warning sign, does not mean we cannot work with this distributor, but we need to conduct due diligence and understand the procurement representative’s request. There may be a legitimate business reason for the request, in which case we can vet the customer’s recommended distributor. Remember, always speak up when you have concerns or see a red flag and seek guidance from the **Ethics and Compliance Group** to develop a plan for resolving or mitigating the red flag when possible.

We do what's right, always

COMPETITION LAWS

To sustain the company and protect its stakeholders:

- I uphold Trane Technologies' **responsibility to compete** fairly and never collude with outside parties by entering into **improper agreements** that could restrict or distort competition.
- I respect our customers and suppliers and **treat them fairly**.
- I respect the **autonomy** of our distributors.
- I contact the **Legal department** or call the **Ethics HelpLine** if I suspect that anti-competitive conduct has taken place or could take place in the future; I never try to remedy the situation myself.

Definitions

RESPONSIBILITY TO COMPETE	Companies are expected to compete fairly which means never entering into any agreement or discussion, especially with Trane Technologies competitors, aimed at fixing or coordinating sales or purchase prices, or dividing or allocating markets (by customers, territories, products or otherwise), or share with or request from anyone non-public information related to prices, sales or purchases (e.g. volumes) or other market sensitive data.
IMPROPER AGREEMENTS	Agreements do not need to be legally binding, in writing or signed, for them to be improper. Oral arrangements and so-called gentlemen's agreements may also violate antitrust laws. In addition, anticompetitive agreements are sometimes inferred merely from the actions of the people involved; e.g., how they behave in the marketplace, the contents of emails and topics of meetings and conversations. In certain countries, the mere proposal to enter into an anticompetitive agreement is illegal, even if the proposal has been explicitly rejected by the addressee. As a result, no employee should ever discuss inappropriate topics with competitors.
TREAT THEM FAIRLY	Do not refuse to deal with particular counterparts without consulting with the <u>Legal department</u> . In addition, do not treat parties in a manner that could be perceived as discriminatory, such as applying unfairly dissimilar conditions to different parties.
AUTONOMY	Respecting the autonomy of our distributors means never agreeing with or requiring our distributors to resell our products at certain prices (Resale Price Maintenance) or taking measures unduly restricting their sales territories (Territorial Restraint).

Related Policies:

- Contact a member of the **Legal department** for additional information regarding competition laws.

Frequently asked questions

“I am a sales person and I received an email from a customer asking me to quote a job. Attached to his email was a quote for the same job prepared by a third-party competitor of Trane Technologies’. What should I do?”

In principle, it is not illegal to use information independently provided to you by a customer. Thus, in this situation, you may set your pricing level taking into account the copy of the competitor's quote. However, you should not use the competitor's quote if there were any indication that it was directly or indirectly communicated to you by the competitor itself, or that the transmission of the quote was otherwise triggered or approved by the competitor (e.g., if the competitor was cc'ed in the customer's email request to you). Also, you must abstain from soliciting customers to provide you with competitors' quotes. Also see the **Confidential Information** section of this Code.

“I recently attended a meeting with a customer that is renting some of our industrial equipment. Following a conversation on the terms and conditions of a possible equipment purchase, the customer suddenly asked me if Trane Technologies would be interested in a marketing cooperation arrangement to leverage the complementary geographic focus of the rental fleets operated by the two companies, which are competitors. What should I do?”

It is fine to discuss the conditions of a sale and purchase of company equipment with a customer when he is acting in his capacity as buyer. However, discussing matters related to a competitive relationship (including cooperation or joint venture agreements) creates specific antitrust risks and is therefore subject to prior approval by the **Legal department**. Every meeting with a thirdparty company, who has or may become a competitor, must be subject to a pre-agreed agenda strictly limited to appropriate topics. In the event that inappropriate topics are raised during the meeting, you are expected to explicitly oppose them and have your opposition duly documented (minutes, letter). If the other party continues to raise the issue, put an end to the discussion immediately and leave the room. Inform the **Legal department** about the situation as soon as possible.

“We recently introduced some new products to our distributors at a local Trane Technologies facility. Following that meeting, I received a thank you email from one of the participants with an attachment entitled, “Market Prices for Trane Technologies Products”. His email was addressed to me, but was cc'd to the participants from other distributors “for your information”. What should I do?”

This communication creates a very serious antitrust risk and must be addressed. The situation suggests that Trane Technologies and its distributors may have agreed on the resale prices of its products and/or that Trane Technologies is trying to impose (prohibited) minimum resale prices to its distributors. Thus, Trane Technologies must make clear in writing to the distributors that:

- No meeting involving Trane Technologies where resale prices were been agreed or discussed has ever taken place with any distributor;
- Trane Technologies disapproves of any discussion or agreement between distributors regarding resale prices; and
- Distributors are free to set their resale prices independently and the company will not interfere in this freedom by rewarding distributors for sticking to a given price level or punishing them for not doing so.

In any situation like this, always contact a member of the **Legal department**.

We do what's right, always

ACCOUNTING AND FINANCIAL RECORDS AND CONTROLS

To sustain the company and protect its stakeholders:

- I **maintain** Trane Technologies' books and records to **accurately** reflect company funds, assets and transactions.
- In regards to all of Trane Technologies' financial and accounting transactions, I **operate** with the highest levels of integrity, honesty and transparency.
- I **speak up** if something doesn't seem right.

Definitions

MAINTAIN	<ul style="list-style-type: none">• Ensure the accuracy of all company financial and accounting records and entries.• Retain such records according to the company's Records Retention Policy.• Be cognizant of potential violations of company policies or laws that become visible through financial data and knowledge of business operations.• Maintain awareness of and perform duties consistent with financial and accounting-related laws, regulations and professional standards; request appropriate professional advice as needed.• Promptly report any pressure from management exerted for the purpose of inappropriately influencing reported financial results with respect to accounting judgments and estimates.
ACCURATELY	<ul style="list-style-type: none">• Be maintained according to U.S. Generally Accepted Accounting Principles (GAAP) and International Financial Reporting Standards (IFRS), as applicable.• Comply with local statutory reporting requirements.• Be accurate and complete in every respect in terms of describing the transactions covered by the entries.• Not contain any false or misleading entries.• Have entries recorded in a timely manner.
OPERATE	<p>Do not refuse to deal with particular counterparts without consulting with the Legal department. In addition, do not treat parties in a manner that could be perceived as discriminatory, s Detect and prevent any pressure on accounting personnel for the purpose of influencing financial results.</p> <ul style="list-style-type: none">• Take all necessary steps to ensure that reports and other documents are accurate and complete in every respect. <p>Do not exert or allow anyone else to apply any undue pressure on company personnel to meet financial targets. uch as applying unfairly dissimilar conditions to different parties.</p>

We do what's right, always

ACCOUNTING AND FINANCIAL RECORDS AND CONTROLS

Definitions

SPEAK UP

There are many ways you can speak up, ask questions, or report unethical conduct:

- Talk to your manager
- Share your concerns with another manager
- Consult with a member of the Human Resources or Legal departments
- Contact a member of the Ethics and Compliance Group
- Call the **Ethics Help Line**
- Send an email to: ETHICS@tranetechnologies.com.

Related Policies:

- **Records Retention Policy & Procedure**
You must be connected to VPN to access this policy.

Frequently asked questions

“Getting a supplier set up in the system is time-consuming and laborious. Is it okay to keep a small petty cash fund in the office so I can get a small supplier paid?”

No. All company accounts and funds expended on behalf of the company must be accurately and properly recorded. Additionally, the creation, maintenance and use of petty cash or other types of cash funds is strictly prohibited, unless pre-approved in writing by the Vice President and Chief Accounting Officer.

“Our business agent has requested a \$25,000 cash advance for expenses. I have no reason to assume the funds would be used improperly. Is it okay to pay the cash advance?”

No. This type of vague request is a warning sign that the funds may potentially be used for an improper purpose. Additionally, we have an obligation to obtain accurate documentation of the expenditure and accurately record the purpose of the expenditure in our books and records. For further guidance, see the **Anti-bribery and Corruption** section of this Code.

“My business needs to manipulate the financials just a little to make its commitment for the quarter. Plus, I am certain real profits will be locked in very early in the subsequent quarter, and no one will ever see the reserve adjustment for which I plan to make a fake entry for this quarter. Is this okay?”

No. We strictly follow our accounting policies, as they are an integral part of the system we rely on to maintain the integrity, accuracy and, therefore, legality of our internal and external financial reports. Manipulating results to achieve a quarterly target is a fraudulent activity and can result in termination of employment. In addition, you should never feel pressured to adjust any financial or accounting information to achieve a desired result. If you are pressured to do so, you should contact the **Ethics and Compliance Group** or Audit Services immediately.

“A senior business leader is pressuring me to make an accounting entry that, in my judgment as a junior accountant, is questionable. Is my best course of action to keep quiet and do what the senior business leader wants?”

No. Never ignore your professional judgment, and always act on your responsibility to speak up—even if you feel pressure from above. You should elevate your questions or concerns within your accounting group, or reach out to other resources in the company, such as Audit Services or the **Ethics and Compliance Group**, until you are satisfied with the resolution of the issue.

We do what's right, always

MONEY LAUNDERING AND EXCHANGE CONTROLS

To sustain the company and protect its stakeholders:

- I pay special attention to unusual requests, such as requests to transfer funds through **offshore accounts**, because I know they could be a warning sign that **money laundering** is occurring.
- I immediately report **money laundering warning signs** to my manager, a member of the **Legal department** or the **Ethics and Compliance Group**.
- I do not accept large **cash payments**, unless pre-approved by senior management, because they may pose risks related to money laundering, safety and our risk-management efforts.

We do what's right, always

MONEY LAUNDERING AND EXCHANGE CONTROLS

Definitions

OFFSHORE ACCOUNTS	Accounts outside the contracting party's registered jurisdiction.
MONEY LAUNDERING	Moving the proceeds of crimes to hide where they came from, or transferring legitimate funds for criminal purposes, including terrorism.
MONEY LAUNDERING WARNING SIGNS	<p>These warning signs may include:</p> <ul style="list-style-type: none">• Transactions in cash or cash equivalents.• Structuring payments to avoid reporting requirements.• Payments through unrelated countries or unrelated parties.• Payments in one form followed by requests for refunds in another form.• Payments from multiple parties for the same account.• Customers or suppliers who provide inaccurate or incomplete information or who do not have a physical address.• Customers or suppliers who are Designated Parties, Specially Designated Nationals, or who appear on international restricted party lists.
CASH PAYMENTS	In some jurisdictions, cash or cash equivalent transactions at or above certain amounts must be formally reported; for example, in the U.S. the amount is \$10,000 or more and is reportable to the Internal Revenue Service.

Related Policies:

- If you have any questions regarding Money Laundering and Exchange Controls, contact a member of the **Ethics and Compliance Group**
- Also see the **Business Partner Vetting** section of this Code.

Frequently asked questions

“A customer has arranged to buy equipment from us through one of its affiliates in a different country and has provided banking information based in yet a third country. The affiliate is incorporated in a country that is well-known as an offshore tax haven. Should I be concerned about possible money laundering?”

Yes. We must be careful about transactions in which payments are made to, or from countries, that differ from where the equipment will be sold, where the services will be provided, or where the contracting party's employees and main offices are located. Another warning sign would be payment from an unrelated party to the party with which Trane Technologies contracted, especially if that party is located in a country not related to the transaction. Such transactions may involve money laundering or tax evasion, or may facilitate corrupt payments. You should contact the **Legal department** or the **Ethics and Compliance Group** for guidance.

“An approved and vetted business partner has asked us to make future payments into a different bank account under a different name than that of their organization. Is there a problem with this?”

Yes. We want to ensure that we work closely with and support our business partners; however, we must also ensure that when payments are made, that they are going to be paid honestly and transparently. Any requests to change bank account details should be carefully reviewed and verified that they have been authorised by the business partner. Any request to transfer funds to accounts in different countries or in different names should be checked by the **Legal department** or the **Ethics and Compliance Group**.

“A customer wants to pay for goods in cash. Is that ok?”

Under almost all circumstances, no. This rule serves to ensure that our books and records are accurate and transparent. While small cash payments from customers for certain “retail” transactions may be appropriate, they are the exception and not the rule. Trane Technologies expects customers to pay for goods and services using money transfers to agreed upon bank accounts. If you have any requests for payments to be made in cash, you should first seek the advice and direction of the **Legal department** or the **Ethics and Compliance Group**.

We do what's right, always

GOVERNMENT PROCUREMENT

To sustain the company and protect its stakeholders:

- When I need help complying, or suspect noncompliance, with the **specific laws and regulations that apply to doing business with the government**, I seek guidance from the **Legal department**.
- When I provide information to the government, it is complete and accurate.
- Before considering a former government employee for a job with Trane Technologies, I consult with **Human Resources** and the **Legal department**.

Definitions

SPECIFIC LAWS AND REGULATIONS THAT APPLY TO DOING BUSINESS WITH THE GOVERNMENT

We are bound by specific laws and regulations when selling to government entities or agencies. These laws and regulations apply in our dealings not only with government entities or agencies but also when the company deals indirectly with such entities or agencies as a supplier or subcontractor. These laws and regulations include, but are not limited to, the obligations to comply with contract specifications, to accurately report cost and pricing data, and to prevent disclosure of classified material.

Related Policies:

- US specific rules regarding government procurement are located here:
 - Federal Contracting Playbook
 - Federal Standards of Business Ethics & Conduct
- Also see the **Gifts and Entertainment** section of this Code
- Also see the **Anti-bribery and Corruption** section of this Code

Frequently asked questions

“Are there limits on the gifts and entertainment that I can provide to employees and representatives of governmental entities?”

Yes. Stricter and more specific company policies and laws and regulations apply when we do business with employees, officials, or representatives of government entities. These stricter and more specific policies and laws also apply to the family members of employees, officials, or representatives of government entities. In many countries, such as China and the United States, government officials are prohibited from accepting anything of value or nothing more than an inexpensive meal or a nominal gift (e.g., valued at less than US\$25). If your job responsibilities include working with government or public sector employees, you must have specific knowledge that any gift or entertainment is permitted by Trane Technologies policy and specific laws and regulations before you offer such a gift or entertainment. We encourage you to seek guidance from a member of the **Ethics and Compliance Group** or the **Legal department** before giving a gift to, or entertaining a, government official.

We do what's right, always

INSIDER TRADING AND INVESTMENT IN SECURITIES

To sustain the company and protect its stakeholders:

- When I possess **material non-public information** about Trane Technologies, I do not trade or recommend the **trading in securities** of the company.
- If I learn **material non-public information** about any other company in the course of my employment, I do not trade or recommend the trading of that company's securities.
- I maintain the confidentiality of all **material non-public information**.
- I only discuss **material non-public information** with co-workers to the extent that it is necessary for me to do my job.
- I immediately **report** instances of non-compliance with the company's policies governing **material non-public information** and **trading in securities** of the company.

Definitions

<p>MATERIAL NON-PUBLIC INFORMATION</p>	<p>The materiality of information depends upon the circumstances.</p> <ul style="list-style-type: none">• A fact is considered “material” if there is a substantial likelihood that a reasonable investor would consider it important in making a decision to buy, sell or hold a security, or where the fact is likely to have a significant effect on the market price of the security.• Information is “non-public” if it is not available to the general public. In order for information to be considered public, it must be widely disseminated by the company in a manner making it generally available to investors.
<p>TRADING IN SECURITIES</p>	<p>To transact or trade in securities includes:</p> <ul style="list-style-type: none">• purchase or sale, including any exercise of stock options,• transactions in puts, calls or other derivative securities tied to a security of a company,• entering into a credit default swap on a company's debt, or• making or modifying any instructions or investment options (including under the company's or any other company's 401(k) plan) that could result in any of the foregoing.

We do what's right, always

INSIDER TRADING AND INVESTMENT IN SECURITIES

Definitions

REPORT

There are many ways you can speak up, ask questions, or report unethical conduct:

- Talk to your manager
- Share your concerns with another manager
- Consult with a member of the Human Resources or Legal departments
- Contact a member of the Ethics and Compliance Group
- Call the **Ethics Help Line**
- Send an email to: ETHICS@tranetechnologies.com.

Related Policies:

- **Insider Trading Policy**
- **Regulation Fair Disclosure Policy**
- **Social Media Policy**
- Also see the section of this Code regarding **Confidential Information**

Frequently asked questions

“I received an advance draft of the company’s earnings release detailing performance for the quarter prior to its release. Can I trade in the company’s securities?”

No, you may not trade in the company’s securities while aware of material non-public information such as earnings results that have not yet been publicly communicated. This same rule applies if you happen to overhear information about the company’s quarterly financial performance before earnings are released.

“While performing a review of confidential materials relating to a public company target for a potential acquisition as part of my job, I discovered that the company has just entered into an important strategic contract that will generate large amounts of revenue. May I trade in that company’s securities?”

No, trading in another company’s securities on the basis of material non-public information that you learned while performing your job violates insider trading laws.

“I learned material non-public information about the company. Over lunch, I discuss the news with a co-worker who I believe is trustworthy but who does not need to know the information. Are there any potential issues with this discussion?”

Yes, you should only share material non-public information with co-workers who need to know the information in order to perform their jobs. By sharing this information, you have also made your co-worker a temporary insider, meaning that your co-worker cannot trade in the company’s securities until this information has been disclosed publicly or is no longer material.

We do what's right, always

GLOBAL TRADE COMPLIANCE

To sustain the company and protect its stakeholders:

- I know exactly with whom I am doing business, avoiding **denied parties**, to comply with global import and export laws.
- No matter where I am in the world, when I import or export company **assets and resources**, I follow the rules.
- Global import and export rules can be complex, so when I am unsure of the boundaries, I ask for help from the **Global Trade Compliance** team.

Definitions

DENIED PARTIES	<p>A denied (or excluded/restricted) party is any party to an international transaction which has been placed on any official denied persons list, is blocked from import or export transactions, or has been sanctioned by a government for illegal acts such as involvement in terrorism, narcotics trafficking, money laundering or weapons proliferation.</p>
ASSETS AND RESOURCES	<p>Products and components, but also:</p> <ul style="list-style-type: none">• Company name and logos• Business opportunities• Patents, copyrights and trade secrets• Confidential information• Technology• Data• Hardware and software• Tools• Vehicles• Land• Buildings• Equipment• Components• Raw materials (including scrap and obsolete materials)• Company credit cards• Company procurement cards ("P-cards")• Cash• The use of email, telephone calls, voicemail and text messages on Company-issued devices such as laptop computers, iPads and other tablet computers, mobile telephones and smart phones including Blackberries, iPhones, Android phones and other similar phones

Related Policies:

- [Standards of Internal Control for Trade Compliance](#)
- [Global Trade Compliance BOS Site](#)

Frequently asked questions

“Why is it important to know my customer?”

Global import and export laws place the burden of responsibility for conducting adequate denied party screening checks on exporters. Trane Technologies is bound by law to avoid handling any transactions which include a denied party.

“Why are Trane Technologies orders screened for Denied Parties?”

Certain individuals and organizations are prohibited from receiving U.S. exports and may require an export license. Some items may require a license based on:

- the destination country;
- the end customer;
- the specific product; and/or
- the end use of the product.

Restricted Party Screening (RPS) is also known as Denied Party Screening (DPS) and can be used interchangeably. The screening process ensures that all Trane Technologies transactions covered by the U.S. Export Administration Regulations (EAR) and the relevant EU journals do not involve persons or entities whose export privileges have been denied by the respective agencies/departments of the U.S., Japan, EU, UN and Canada.

Trane Technologies has the ability to screen transactions against the relevant denied party lists in two ways. First, orders that are processed through the various Trane Technologies systems are automatically and seamlessly screened using an integrated trade compliance software tool. Second, non-system orders with parties requiring screening must be processed manually using a comprehensive web-based screening tool.

More Frequently Asked Questions can be found here:

- [Global Import Export FAQs](#)

We do what's right, always

LEGAL PROCEEDINGS

To sustain the company and protect its stakeholders:

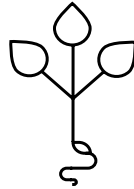
- I contact the Legal department before responding to **any inquiries** from **outside parties** relating to **legal matters**.
- I get approval from the Legal department before resolving **legal matters**.
- I **cooperate fully** with all internal investigations and never initiate or conduct investigations on my own.

Definitions

ANY INQUIRIES	Any request made by any means including by demand letter, telephone, email, or by subpoena or search warrant, for company-related documents, files, electronic data or testimony. Do not provide information in response to any such inquiries without the written approval of the <u>Legal department</u> , unless the request is in the form of a court-authorized search warrant or an authorized government search or raid. Of course, in the event that a search warrant is executed at your location, you must notify the <u>Legal department</u> immediately.
OUTSIDE PARTIES	Any attorney, paralegal, government employee, or investigator. Sometimes, people associated with legal claims are not always forthcoming about their identities or affiliations. By following the general rules of protecting Trane Technologies' confidential information you should feel confident that you are doing the right thing.
LEGAL MATTERS	Include legal proceedings such as lawsuits, government investigations or enforcement actions, as well as claims raised formally through attorneys. If you are unsure, consult with the <u>Legal department</u> .
COOPERATE FULLY	In all matters, be honest, accurate and timely when responding to requests by investigators and never conceal, alter or destroy documents records or information that are subject to an investigation or inquiry; attempt to hinder another employee from providing accurate, honest and timely information related to an investigation; or retaliate against another employee who cooperates with an investigation. This cooperation applies to internal and external investigations. For external matters, the <u>Legal department</u> must be contacted immediately.

Related Policies:

- Any questions about Trane Technologies' processes related to legal proceedings should be directed to the Legal department's **Litigation team**.
- Legal Proceedings Policy Statement**



**We work today for a
sustainable tomorrow.**

We inspire each other to
accomplish great things
for our company, our
communities and our planet.
We believe we can change
the world.

LEADERSHIP
PRINCIPLES



We work today for a sustainable tomorrow

ENVIRONMENTAL, HEALTH AND SAFETY

To sustain the company and protect its stakeholders:

- I am vigilant and abide by all **health and safety practices** to protect myself and my colleagues from harm.
- I always maintain **accurate** environmental, health and safety records and communicate openly and honestly with **regulatory agencies** when necessary.
- I know that seconds can count; therefore I immediately **report** any environmental, health or safety concerns.
- I know what the environmental, health and safety regulations of my particular job are, but when I am unclear, I get help from the **EHS department**.
- I know how to **report** a violation of an environmental, health or safety practice.
- I do my part to improve the company's environmental impact in areas such as waste reduction, water, energy and efficiency improvements.

We work today for a sustainable tomorrow

ENVIRONMENTAL, HEALTH AND SAFETY

Definitions

HEALTH AND SAFETY PRACTICES	Governmental or regulatory bodies anywhere in the world, including local, state, federal or tribal in the U.S., that govern the standard of care and practice with respect to health and safety practices for employees and corporations alike. If you don't know the applicable regulations, you may contact the corporate EHS department to assist in determining what regulations/rules apply to your business.
ACCURATE	Employees must record and provide exact data as required (or requested) by governmental or regulatory bodies anywhere in the world, including local, state, federal or tribal in the U.S., when documenting or reporting on environmental, health or safety statistics, data and/or investigations. Data is accurate only if it is free from manipulation and is presented as it is recorded on the date it is collected.
REGULATORY AGENCIES	Governmental or regulatory bodies anywhere in the world, including local, state, federal or tribal in the U.S., that have jurisdiction over environmental, health and/or safety regulations.
REPORT	<p>There are many ways you can speak up, ask questions, or report unethical conduct:</p> <ul style="list-style-type: none">• Talk to your manager• Share your concerns with another manager• Consult with a member of the Human Resources or Legal departments• Contact a member of the Ethics and Compliance Group• Call the Ethics Help Line• Send an email to: ETHICS@tranetechnologies.com.

Related Policies:

- **EHS Policy Statement**
- **Workplace Violence and Weapons Policy**
- **Environmental, Health and Safety page on the company's intranet**
- **EHS-simple actions** you can take to help Trane Technologies become a more sustainable company.



We work today for a sustainable tomorrow

ENVIRONMENTAL, HEALTH AND SAFETY

Frequently asked questions

“Trane Technologies’ work safety standards exceed what is required in the country where I work, and our competitors only follow local requirements. Shouldn’t we do the same?”

No. In all cases, when our Code prescribes a higher standard, we abide by the Code. And certainly, we must follow Trane Technologies’ safety policies. Trane Technologies is committed to providing employees with a safe and secure environment, even if local law permits a different approach.

“My supervisor has instructed me to disable a safety device. What should I do?”

Don’t do it! Never bypass, disconnect or disable any safety device or monitoring equipment without approval of the EHS representative or regulatory agency. Doing so may be a violation of law and expose you and other employees to accident or injury. You should also report the supervisor’s improper instruction to the [Ethics HelpLine](#), the [Ethics and Compliance Group](#) or to the supervisor’s manager.

“I see oil leaking onto the floor. What should I do?”

Immediately report the situation to your supervisor and/or an [EHS](#) representative. If the situation isn’t resolved within 24 hours, notify the plant manager.

Respecting human rights and conflict minerals

- As required by law, I send all customer requests for information about Trane Technologies' use of **conflict minerals** to ConflictMinerals@tranetechnologies.com and do not attempt to answer surveys, sign customer documents or provide information myself.
- I seek to responsibly source materials from the **covered countries** to avoid supporting the armed groups causing human rights violations.
- I conduct or support due diligence efforts to make sure the people we hire and suppliers we work with do not engage in **human trafficking**, including forced labor or child labor, which Trane Technologies prohibits.
- I watch out for **human trafficking red flags** or warning signs and **raise any concerns** immediately.

Definitions

CONFLICT MINERALS	Cassiterite, columbite-tantalite (coltan), wolframite, or their derivatives (which are currently limited to tin, tantalum and tungsten) and gold.
COVERED COUNTRIES	The Democratic Republic of the Congo, Angola, Burundi, the Central African Republic, the Republic of the Congo, Rwanda, South Sudan, Tanzania, Uganda or Zambia.
HUMAN TRAFFICKING	<p>The recruitment, transfer, receipt or harboring of a person through the use of fraud, threats, coercion, debt bondage (labor demanded to repay a loan) or force for the purpose of obtaining labor. Human trafficking can happen in any industry, including manufacturing. It is most often found in industries with low-skilled or unskilled jobs. A trafficked person is one who is in a position of forced labor, such as domestic servitude, bonded labor, forced child labor and sex trafficking.</p>
HUMAN TRAFFICKING RED FLAGS	<p>Red flags are warning signs you should watch for when hiring or working with a new supplier or temporary employees. A red flag should always trigger your concern, and you should bring the red flag to the attention of ANTIHUMANTRAFFICKING@tranetechnologies.com, the Legal department or Human Resources for appropriate review. Examples of human trafficking red flags include:</p> <ul style="list-style-type: none">• Charging employees a recruitment fee.• Many people living together in a cramped space or with their employer.• Employees who have few or no personal possessions and appear to have an unstable living situation (for example, living in a hotel or with an employer, lacking adequate food or medicine).• Employees who have no money or do not seem to have control over their money.• Employees who appear to have few personal possessions.• A third party holds on to an employee's identification card, passport or other important documents.

Definitions

HUMAN TRAFFICKING RED FLAGS (cont'd)	<ul style="list-style-type: none">• An employee who is not allowed to speak without someone else present (usually a supervisor).• Working excessively long or unusual hours.• Tattoos on the neck or face that look like a brand.• An employee who shows signs of physical or emotional abuse (bruises, avoiding eye contact, fearful, submissive, tense, depressed, nervous or paranoid).• A potential supplier is located in a country with minimal protections for human rights and plant workers are often hired through the use of labor agents or brokers.
RAISE ANY CONCERNS	<p>You should report any concern, issue or question involving conflict minerals or human trafficking to:</p> <ul style="list-style-type: none">• ConflictMinerals@tranetechnologies.com• ANTIHumantrafficking@tranetechnologies.com• Ethics HelpLine• Ethics@tranetechnologies.com• Ethics and Compliance Group• A member of the Legal department• Your Manager.

Related Policies:

- [Conflict Minerals Public Statement](#)
- [Global Human Rights Policy](#)

Frequently asked questions

“Why do I need to be concerned about where our suppliers get the raw materials they use to make products for Trane Technologies?”

For many years, armed groups have fought to control mines within the Democratic Republic of the Congo, a central African country with vast mineral wealth including reserves of conflict minerals. These armed groups smuggle minerals out of the country, the proceeds of which are used to finance conflict and perpetuate criminal behavior. These armed groups have been cited for committing multiple human rights violations and contributing to the humanitarian crisis in the region. Concerned about these developments, regulators in the United States and in other regions have passed and/or are considering regulations requiring certain companies, like Trane Technologies, to report on the presence of conflict minerals in the products they manufacture.

“In what types of industries and products may conflict minerals be used?”

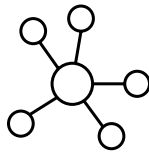
The metals designated as conflict minerals—currently tin, tantalum, tungsten and gold—are used across a wide array of industries, including industrial equipment and machinery, electronics, construction, industrial tools and aerospace. These minerals may be found in alloys, printed circuit boards, solders for joining pipes and circuits, tin plating of steel, heating and welding applications, capacitors and electric plating and wiring.

“Recently, my plant hired two contract employees to help provide temporary support in the kitting area. During the onboarding process, I needed to collect information from these employees, including information from their identification cards and their home address, for Human Resources. The employees seemed uncomfortable, told me the person who helped them get a job with the temporary staffing agency collected their identification cards, and were vague about where they live. Should I be concerned?”

Yes, and you should talk to your manager, **Human Resources** or the **Legal department**. You may also report your concerns to ANTIHUMANTRAFFICKING@tranetechnologies.com. There are two warning signs here that these employees may be the victims of human trafficking. First, a third party is holding the employees' identification cards. Second, the employees are not providing a home address and are being vague about where they live. Trane Technologies prohibits the use of forced labor. Our employment relationships must be voluntary.

“I recently visited a supplier's plant for an audit after the supplier was bought

You are right to have concerns in this situation. Hiring low-skilled employees from another country using a labor broker or agent is a sign of possible human trafficking or forced labor. Additionally, the plant supervisor stopping you from talking to employees and insisting that you finish the audit speaking only to him is a warning sign that the supplier may be using employees who are the victims of human trafficking. Not allowing an employee to speak unless a manager is present is one way a supplier may control employees and stop them from speaking up about their situation. You should report your concerns to your manager, **Legal department** or ANTIHUMANTRAFFICKING@tranetechnologies.com.



We keep customers at the heart of all we do.

We create exceptional
customer experiences
through our expertise,
focus and care.
We partner on solutions
that ensure our
customers' success.

LEADERSHIP
PRINCIPLES



We keep customers at the heart of all we do

MARKETING, CUSTOMER SERVICE AND QUALITY

To sustain the company and protect its stakeholders:

- I always make honest and truthful representations regarding Trane Technologies products and services.
- I never sacrifice quality for cost savings.
- I immediately **report** quality concerns.
- I follow procedures for storing, handling and shipping Trane Technologies products.
- I comply with all government and company standards regarding Trane Technologies products, and when I am uncertain of the rules, I contact the **Legal department**.

We keep customers at the heart of all we do

MARKETING, CUSTOMER SERVICE AND QUALITY

Definitions

REPORT	<p>There are many ways you can speak up, ask questions, or report unethical conduct:</p> <ul style="list-style-type: none">• Talk to your manager• Share your concerns with another manager• Consult with a member of the Human Resources or Legal departments• Contact a member of the Ethics and Compliance Group• Call the <u>Ethics Help Line</u>• Send an email to: Ethics@tranetechnologies.com.
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Related Policies:

- **Marketing, Customer Service and Quality Guidelines**
- **Social Media Policy**
- Also see the **Global Issues - Conflict Minerals** section of this Code
- Also see the **Global Trade Compliance** section of this Code



We keep customers at the heart of all we do

MARKETING, CUSTOMER SERVICE AND QUALITY

Frequently asked questions

“My supervisor told me we are behind on deliveries on an important contract and must do whatever it takes to get the product delivered by month-end. I am concerned that our normal quality standards will be ignored to meet the delivery requirements. What should I do?”

Talk to your supervisor to clarify his instructions and explain your concerns. If you are not satisfied, contact the [Legal department](#) or the [Ethics HelpLine](#). Trane Technologies has a reputation for quality, and we will not lower our standards to meet deadlines. Each employee has a personal responsibility to ensure that we can continue to achieve Trane Technologies' quality criteria.

“I noticed some negative feedback on our company Facebook page and I believe the person who commented is wrong. I want to correct the information being shared and protect our reputation. What should I do?”

Contact the [Communications](#) or the [Legal department](#) so they may properly address your concerns. Do not respond with negative comments to the original poster.



We keep customers at the heart of all we do

COMMUNICATIONS WITH THE MEDIA

To sustain the company and protect its stakeholders:

- I do not respond to inquiries from the media, investors or anyone in the public about Trane Technologies' financial matters, business strategies or processes, or management and refer them directly to the **Communications department** for review and coordination with the appropriate internal stakeholders.
- I provide **external communications** to my business/function Communications Partner or the **Communications department** for **review** prior to distribution and with sufficient time for input.
- I never permit a member of the media to come onto Trane Technologies property or inside company facilities without contacting my Communications Partner or **Communications department** and the local facility leader.

We keep customers at the heart of all we do

COMMUNICATIONS WITH THE MEDIA

Definitions

EXTERNAL COMMUNICATIONS	Any presentation, technical paper, byline, news release or similar communication that is intended for an audience outside of Trane Technologies.
REVIEW	The Communications department reviews presentations made to external audiences to ensure proper messaging that continues to enhance the company's visibility and promote quality communications for our target external audiences.

Related Policies:

- Media Relations Policy
- Crisis Management Resource Guide
- Regulation Fair Disclosure Policy

We keep customers at the heart of all we do

COMMUNICATIONS WITH THE MEDIA

Frequently asked questions

“A reporter called me looking for some basic information about the company. Can I answer his questions?”

No. Even simple questions should be forwarded to your Business/Function Communications Business Partner or **Communications department** because you may not have all of the relevant facts. Even if you provide accurate information, releasing it at the wrong time could interfere with marketing plans and give our competitors too much time to react. In addition, uncoordinated disclosure could pose problems under U.S. federal securities laws if the information released was material inside information. Even disclosures that may seem harmless can create problems.

“I am speaking at an external industry association event. Does someone need to review and approve my presentation?”

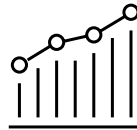
Yes. All external communications (presentation, technical paper, byline, news release) must be submitted to your Business/Function Communications Partner or the **Communications department** for their review and coordination with other reviewers, such as Legal or Investor Relations, with sufficient time to review prior to distribution. This ensures we continue to enhance the company's reputation and promote quality communications for our target external audiences.

“I am a member of an industry organization and have been asked to represent the organization as a spokesperson to the media. May I do so?”

Yes. However, you are required to receive media training or guidance from your Communications business/function partner prior to discussions with the media. Media training or guidance from your Communications partner will equip you with skills to present yourself and your organization in the most positive way. Also, because your role and work with Trane Technologies may become a focus in the interview, your training will ensure we promote accurate and favorable coverage of the company.

“I’m active in my local community and often attend city council meetings where I speak out on issues of local interest. Sometimes I refer to my role and experiences at Trane Technologies to support my opinions. Is that okay?”

Yes, however, you must always clarify that your opinions are your own and do not represent those of the company.



**We make
better happen.**

We're always improving
our work to enhance
customer value.
We seek new approaches,
simplify, learn and share
our knowledge.

LEADERSHIP
PRINCIPLES



We make better happen

RETENTION OF BUSINESS RECORDS AND COMMUNICATIONS

To sustain the company and protect its stakeholders:

- I keep **company records** only for the length specified in our Records Retention Policy unless they are subject to a **legal hold order**.
- I keep all records that are subject to a **legal hold order** for the duration of the order and only dispose of them when permitted to do so by the **Legal department**.
- When it is time to **dispose of company records**, I do so appropriately and according to the **Records Retention Schedule**.
- My business communications are professional, **factual** and honest.
- I **speak up** immediately when I suspect company records or communications are not being maintained properly.

Definitions

COMPANY RECORDS	Records related to current or in-process activities. These records are typically referred to on a regular basis to respond to internal and external business requirements. Examples include (but are not limited to): open invoices, active case files, current or open contracts, projects in process and current personnel files.
LEGAL HOLD ORDER	(Also known by other names such as Litigation Hold Order) The procedure used to suspend destruction of certain records even if the Records Retention Program mandates destruction. Generally speaking, holds are issued from the Legal, Tax and Human Resources departments in response to actual or threatened litigation.
DISPOSE OF COMPANY RECORDS	After the conclusion of the length of time that a record must be retained pursuant to the Record Schedule an employee must destroy the company record.
RECORDS RETENTION SCHEDULE	The Trane Technologies Policy document that dictates the legal and operational records retention requirements. See the <u>Records Retention Policy & Procedures</u> for more information.
FACTUAL	Accurate and non-speculative, especially with regard to legal conclusions.
SPEAK UP	There are many ways you can speak up, ask questions, or report unethical conduct: <ul style="list-style-type: none">• Talk to your manager• Share your concerns with another manager• Consult with a member of the Human Resources or Legal departments• Contact a member of the Ethics and Compliance Group• Call the <u>Ethics Help Line</u>• Send an email to: Ethics@tranetechnologies.com.

Related Policies:

- **Records Retention Policy & Procedure**
You must be connected to VPN to access this policy.

Frequently asked questions

“I have kept copies of customer invoices in a personal file and would like to destroy the documents; however, the Records Retention Schedule says I must keep these types of records for 7 years. What can I do?”

Copies of official records are not considered records if they are duplicates and can be destroyed at will, as long as the official record of the transaction is stored in a centrally located area for the specified time period.

“A financial account has been inactive for a number of years. I want to get rid of the records. I consulted the Records Retention Schedule, which says I need to keep the records from this account. What can I do?”

You must retain the records from this financial account as stated in the **Records Retention Schedule**. You must be connected to VPN to access the Records Retention Schedule.

“My boss has been pushing me to achieve certain productivity savings for a new product development project. In a recent email update, I overstated the potential cost savings to meet the numbers my boss needs. That is okay, right? I mean, I’m pretty confident I ultimately can get the project to provide these productivity savings.”

No. Your boss will rely on your email update and cost savings analysis in representations about the new product development project to his supervisors and in forecasting financial performance for your business. If you never achieve the productivity savings you said you already had achieved, the overstatements in your email could have serious consequences for the business. To the best of your abilities, you should always be factual in your communications.



We make better happen

COMPUTER AND CYBER SECURITY

To sustain the company and protect its stakeholders:

- I am responsible for our company's **information security**, so I take appropriate measures to keep our information **safe**.
- I follow our company's information technology **acceptable use** policies.
- I use caution when I see or receive something **suspicious**, and report concerns to **IT Security & Compliance**.
- I **contact IT Security & Compliance** immediately for theft, loss or unauthorized disclosure of devices, assets and data.

Definitions

INFORMATION SECURITY	Preventing unauthorized access, use, modification, theft or destruction of our company's information.
SAFE	<p>You can help keep our information safe by following these best practices:</p> <p>Physically:</p> <ul style="list-style-type: none">• Maintain a clean desk.• Always safeguard your laptop, phone, tablet or other devices, especially when traveling.• Secure sensitive and confidential material by locking drawers, file cabinets and offices.• Promptly report the theft, loss or unauthorized disclosure of devices, assets and data. <p>Electronically:</p> <ul style="list-style-type: none">• Always use the CTRL + ALT + Delete function to "Lock Your Computer" when not in use.• Use the Data Classification Policy to classify your data and protect it appropriately.• Password-protect or encrypt important files.• Use strong passwords – the longer, the better.• Do not share User IDs or Passwords.• Always use VPN to connect when you are not in the office.• Take precaution with unfamiliar emails, phone calls and links/attachments.• Ensure your mobile device uses our mobile device management solution.• Do not use free Wi-Fi networks, particularly in high traffic public places.• Use IT Security tools to protect data, such as VPN, multi-factor authentication and encryption.
ACCEPTABLE USE	<ul style="list-style-type: none">• Use Trane Technologies resources and systems to support our company's business operations, in line with our company values, and not for personal gain.• Only access data that is necessary to perform your job.

Definitions

<p>ACCEPTABLE USE (cont'd)</p>	<ul style="list-style-type: none">• Use Trane Technologies resources and systems to support our company's business operations, in line with our company values, and not for personal gain.• Only access data that is necessary to perform your job.• Only use authorized software and applications approved by Trane Technologies.• Do not use Trane Technologies' devices, systems or networks to engage in illegal/unethical activities or to access inappropriate sites, such as pornography, violence and gambling.• Follow all requirements outlined in the Acceptable Use and Responsibility Policy.
<p>SUSPICIOUS</p>	<p>An unexpected request to click on a link, open an attachment, or enter your login information.</p> <p>Identify suspicious emails:</p> <ul style="list-style-type: none">• Unfamiliar emails, links and attachments.• Requests for you to enter login information.• Spelling mistakes, abnormal grammar or references.• Lack of a formal email signature, vague display name or greeting.• Claims to be a Trane Technologies site, but does not use Trane Technologies branding.• Sense of urgency, fear, or asking for shortcuts to standard procedures.

Definitions

SUSPICIOUS (cont'd)	Identify suspicious phone calls: <ul style="list-style-type: none">• Do not be drawn into calls with unknown callers.• Do not give information to callers you do not know or did not call yourself.
CONTACT IT SECURITY & COMPLIANCE	<ul style="list-style-type: none">• Contact a member of the <u>IT Security & Compliance Group</u>.• Submit a <u>My IT</u> Request.

Related Policies:

- **Acceptable Use & Responsibility Policy**
- **Data Classification Policy**

Frequently asked questions

“What responsibility do I have for Trane Technologies’ information security?”

- Choose strong passwords and protect them.
- Follow **Data Classification policy** to classify data and secure accordingly.
- Identify suspicious items, emails or requests for information.
- Only use authorized software and applications.
- Only access files and data that you are authorized to access.
- Keep software up to date (laptop, mobile and all other devices).

“How do I keep information safe?”

Physically:

- Maintain a clean desk.
- Always safeguard your laptop, phone, tablet or other devices, especially when traveling.
- Secure sensitive and confidential material by locking drawers, file cabinets and offices.
- Promptly report the theft, loss or unauthorized disclosure of devices, assets and data.

Electronically:

- Always use the CTRL + ALT + Delete function to “Lock Your Computer” when not in use.
- Use the **Data Classification Policy** to classify your data and protect it appropriately.
- Password-protect or encrypt important files.
- Use strong passwords – the longer, the better!
- Do not share User IDs or Passwords.
- Always use VPN to connect when you are not in the office.
- Take precaution with unfamiliar emails, phone calls and links/attachments.
- Ensure your mobile device uses our mobile device management solution.
- Do not use free Wi-Fi networks, particularly in high traffic public places.
- Use IT Security tools to enhance data protection, such as VPN, multi-factor authentication and encryption.

“Where can I get more information about how to protect our information assets?”

- Visit our **IT Security portal page**.
- View our **Information Technology and IT Security Policies**.
- Learn more about **Mobile Security**.
- Understand what categories of **websites, email attachments, and applications** are blocked.
- Look for our articles on the company’s intranet with new information on different security topics.
- Take IT Security Awareness training on the LMS.
-

“How do I report information security concerns?”

Contact Trane Technologies IT Security & Compliance:

- Contact a member of the **IT Security & Compliance Group**.
- Submit a **My IT Request**.



**We dare to do
things differently.**

Where others see limits,
we see possibilities.
We are curious, push
boundaries and innovate.

LEADERSHIP
PRINCIPLES

We dare to do things differently

INTELLECTUAL PROPERTY

To sustain the company and protect its stakeholders:

- I understand what **patents, trademarks** and **copyrights** are and take steps to protect Trane Technologies' intellectual property.
- I recognize and respect the **patents, trademarks, trade secrets** and **copyrights** that belong to others.
- I take action if I see **copyrighted materials** owned by others being used by Trane Technologies in an unauthorized way, by immediately reporting it to my manager, another manager, **Human Resources**, the **Legal department** or **Ethics and Compliance Group**, or by calling the **Ethics HelpLine**.

Definitions

PATENTS	A patent is a right granted by a government to prevent others from making, using or selling a technical invention within the government's territory for a certain period of time.
TRADEMARKS	A trademark is a recognizable sign or design which identifies products or services as being from a particular source.
COPYRIGHT	A copyright is a form of intellectual property law protection for the creators of original works of expression that have been fixed in any tangible medium of expression that can be perceived, reproduced or otherwise communicated.
TRADE SECRETS	Trade secrets are a big part of what make companies like Trane Technologies unique; they differentiate us from the competition and help ensure our future success. Trade secrets can include: formulas, details of manufacturing processes, lab testing techniques, software algorithms and controller logic, to name a few.
COPYRIGHTED MATERIAL	Copyrighted materials may include: product manuals, instructional materials, marketing literature, product literature, databases, music works, photographs, diagrams, drawings, circuit masks, motion pictures, sound recordings, software code and the like.

Related Policies:

- [Copyright Policy](#)

Frequently asked questions

“We want to hire a consultant to create marketing materials for a new Trane Technologies product launch. Do we need to specify in the consulting agreement that Trane Technologies will own the copyrights to the materials created?”

Yes. Under U.S. copyright law, works created by consultants, independent contractors and the like are owned by the consultant unless there is written agreement to the contrary. Consult a member of the **Legal department** for further guidance.

“I found a picture on the internet that would look great in the presentation I am creating. Am I free to use it?”

No. Never assume that materials found on the internet are free for use. Use of copyrighted materials may only occur in limited circumstances, such as under a copyright license. Consult a member of the **Legal department** for further guidance.

“I am working to create new marketing materials for the launch of a new Trane Technologies product. I have obtained a copyright license to an image from the copyright owner. May I make modifications to the image before I use it?”

It depends. A copyright gives the owner the ability to make reproductions, modifications and to display or perform the materials. Consult a member of the **Legal department** to determine if your license specifically grants you the ability to make modifications to the image.

“I just created a product manual for a new Trane Technologies product. How do I properly mark the manual to provide notice that this is a Trane Technologies copyrighted material?”

A notice should be placed on Trane Technologies copyrighted materials in order to provide the public with notice of the copyright. In general, the format should include a “©” followed by the year of first publication and the name of the copyright owner. Consult a member of the **Legal department** for additional information.

To sustain the company and protect its stakeholders:

- I prevent the unintentional disclosure of Trane Technologies' **confidential information** and **trade secrets**.
- I know what information is considered confidential, but if I am uncertain, I ask.
- I respect **confidential information** that **belongs to others**.
- I take immediate action if **confidential information** owned by Trane Technologies or others is unintentionally disclosed by **reporting** it to my manager, another manager, **Human Resources**, the **Legal department**, the **Ethics and Compliance Group** or by calling the **Ethics HelpLine**.

Definitions

CONFIDENTIAL INFORMATION	Confidential information is any information that is owned by a person or business that, if revealed to unauthorized parties, could cause harm to the owner or place them at a competitive disadvantage. Confidential information may include: engineering drawings and specifications, wage and salary structure, employee personal information, company financial information, bookkeeping or office management procedures, customer lists, details of new products, research in progress and invention disclosures.
TRADE SECRETS	Trade secrets are a big part of what make companies like Trane Technologies unique. They differentiate us from the competition and help ensure our future success. Trade secrets can include: formulas, details of manufacturing processes, lab testing techniques, software algorithms and controller logic, to name a few.
BELONGS TO OTHERS	A copyright is a form of intellectual property law protection for the creative Confidential information that does not belong to Trane Technologies, but to a third party, such as a competitor, supplier or even customer. It is a form of intellectual property protection for original works of expression that have been fixed in any tangible medium of expression that can be perceived, reproduced or otherwise communicated.

Definitions

<p>REPORTING</p>	<p>There are many ways you can speak up, ask questions, or report unethical conduct:</p> <ul style="list-style-type: none">• Talk to your manager• Share your concerns with another manager• Consult with a member of the Human Resources or Legal departments• Contact a member of the Ethics and Compliance Group• Call the <u>Ethics Help Line</u>• Send an email to: Ethics@tranetechnologies.com.
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Related Policies:

- **Confidential Information and Trade Secret Policy**
- **Regulation Fair Disclosure Policy**
- Also see the **Inside Information and Investment in Securities** section of this Code.
- Also see the **Social Media** section of this Code.

Frequently asked questions

“I just joined Trane Technologies. My prior employer is a competitor. Can I share some important marketing information that I developed while at my former company?”

No. It is neither ethical nor a good business practice to share this confidential information. You are obligated to protect your past employer’s confidential information just as Trane Technologies employees are obligated to protect our company’s confidential information should they leave the company.

“I have been asked to investigate resourcing a component we currently buy from a supplier. Engineering really likes the current component and how it functions. May I send the current supplier’s drawings and other information in the bid package so new suppliers will know exactly what we want?”

No. The drawings and other information the current supplier provided to us are confidential information that we have a duty not to disclose. You are obligated to protect this supplier’s confidential information just as you would protect Trane Technologies’ confidential information. Contact your Legal department representative for additional guidance.

We dare to do things differently

PROTECTING COMPANY RESOURCES AND THE TRANE TECHNOLOGIES NAME

To sustain the company and protect its stakeholders:

- I treat Trane Technologies **assets and resources** with **care** - using them for business purposes only.
- I conduct company business on company-issued devices only.
- The Trane Technologies name and brands are valuable, so I use them carefully and in accordance with our policies and procedures.
- I protect Trane Technologies' reputation, our customers, my colleagues and myself by **safeguarding** the company's **confidential information**.

Definitions

ASSETS AND RESOURCES	<p>Products and components, but also:</p> <ul style="list-style-type: none">• Company name and logos• Business opportunities• Patents, copyrights and trade secrets• Confidential information• Technology• Data• Hardware and software• Tools• Vehicles• Land• Buildings• Equipment• Components• Raw materials (including scrap and obsolete materials)• Company credit cards• Company procurement cards (“P-cards”)• Cash• The use of email, telephone calls, voicemail and text messages on Company-issued devices such as laptop computers, iPads and other tablet computers, mobile telephones and smart phones including Blackberries, iPhones, Android phones and other similar phones
CARE	<p>In accordance with the law, company policies and in a thoughtful and conservative manner.</p>
SAFEGUARDING	<p>Includes such behaviors as properly securing confidential documents, locking cabinets and drawers, using strong passwords, encrypted portable drives and taking other such measures to ensure information is protected.</p>

Definitions

CONFIDENTIAL INFORMATION

Confidential information is any information that is owned by a person or business that, if revealed to unauthorized parties, could cause harm to the owner or place them at a competitive disadvantage. Confidential information may include: engineering drawings and specifications, wage and salary structure, employee personal information, company financial information, bookkeeping or office management procedures, customer lists, details of new products, research in progress and invention disclosures. Also see the Confidential Information section of the Code.

Related Policies:

- [Conflicts of Interest Policy](#)
- [IT Security Portal Page](#)
- [Data Protection & Privacy](#)

Frequently asked questions

“May I make a personal phone call from work to check in with a child-care provider or to let my spouse know that I will be late?”

Of course you may make a quick call to check in with a child-care provider or to let your spouse know that you will be late. As long as the calls are limited and do not interrupt others near you, certain incidental personal calls are permitted. However, certain manufacturing locations may have strict rules prohibiting personal phone calls during shifts.

“I have received a request for information from one of my key customers, who would like to be provided with specific information about Trane Technologies operations and conduct. What should I do?”

Any requests for information from customers or any other third party should be directed to the **Legal department** to review. They will advise you as to what can be shared, and may, in some instances, help with any subsequent communications.

“My neighbor asked me to do some work on his house this weekend. May I bring home the tools that I use at work or use the tools from my company van?”

No. Company vans, tools and equipment are to be used only for business purposes.

Our Code of Conduct

ACKNOWLEDGMENT OF THE CODE OF CONDUCT

I understand that every employee is required to comply with the Code of Conduct. I also understand that the Code and the policies discussed in it do not constitute an employment contract, and that no contractual rights are created by the issuance of the Code and related policies.

If I have a question or concern about the Code, or know of or suspect a possible violation of the Code or other Company policy, I will speak up and communicate my concerns to my manager, another manager, a member of the **Human Resources** or **Legal** departments, or the **Ethics and Compliance Group**. Or, I may contact the Trane Technologies Ethics Helpline using the link below or by sending an email to ETHICS@tranetechnologies.com.

To access the policies and other resources referenced in the Code, visit the online version of the Code at tranetechnologies.com/code-of-conduct or the *My Resources* and *Functions* sections of the Trane Technologies *ClimateZone* intranet at tranetechnologies.sharepoint.com.

Access the Ethics HelpLine at secure.ethicspoint.com/domain/media/en/gui/55190/index.html

This Certificate of Acknowledgment will be retained in my permanent personnel file.

“I have received and read the Trane Technologies Code of Conduct and will comply with it.”

Name:

E-mail Address:

Employee Identification Number (If available):

SBU/Function:

Address, City & Country:

Signature:

Date:



Trane Technologies (NYSE: TT) is a global climate innovator. Through our strategic brands Trane and Thermo King, and our portfolio of environmental products and services, we bring efficient and sustainable climate solutions to buildings, homes and transportation. tranetechnologies.com