



# Code of Conduct

## for Business Partners

Trane Technologies is committed to conducting business with the highest ethical standards. Maintaining these standards has never been more important than in today's competitive and rapidly changing global business climate.

This Trane Technologies Code of Conduct for Business Partners ("Code") sets Trane Technologies' expectations and standards for doing business and applies to agents, distributors, dealers, contractors, intermediaries, joint venture partners, suppliers and other business partners ("Business Partners") of Trane Technologies and its operating subsidiaries, affiliates and divisions, including merchandising affiliates of Trane Technologies.

The highest legal, moral and ethical standards of honesty, integrity and fairness are to be practiced in the conduct of Trane Technologies' affairs. In order to meet this standard, Trane Technologies expects each of its Business Partners to operate and act in full compliance with this Code and all applicable laws and regulations. Trane Technologies expects that Business Partners will hold their suppliers and other third parties to the same standards, and as such this Code also applies to affiliates and subcontractors of Business Partners and to their respective facilities to the extent those facilities supply goods and services for ultimate sale to or use by Trane Technologies.

Trane Technologies reserves the right to assess conformance to these requirements and will expect our Business Partners to correct non-conformance issues identified during assessments. Upon request, Business Partners will provide Trane Technologies with information to enable it to assess conformance with the code. We want to work with our Business Partners to improve conditions. If a Business Partner refuses or is unable to correct the non-conformance to our satisfaction, we may terminate the relationship as a last resort.

This Code consists of four parts: Employee Code of Conduct, Responsibility of Business Partners, Trane Technologies' Commitment to Business Partners, and Resolving Ethics Issues. After fully reviewing this Code, the Business Partner will be fully aware of the standards to which Trane Technologies holds itself and Trane Technologies' expectations of its Business Partners' actions.

### **Employee Code of Conduct**

Trane Technologies holds all of its employees, officers, and directors, when they are acting in connection with their official Trane Technologies duties, to the policies set forth by the [Trane Technologies Code of Conduct](#).

As a Company with global operations, we are committed to following the laws and regulations applicable to the locations in which we operate. Where this Code differs with local laws, we aspire to follow the higher standards unless actions required by the Code are prohibited by local law. Compliance with the Code and



applicable laws are the minimum standard of conduct. All employees are expected to act with the highest business ethics in all Trane Technologies activities and transactions.

## **Responsibility of Business Partners**

As an extension to our Employee Code of Conduct, the following describes the responsibilities of Business Partners doing business with Trane Technologies. These highlight our expectations of our Business Partners, over and above any other contractual agreements such as supply, agent and distribution agreements and purchase orders. Trane Technologies reserves the right to amend this list of responsibilities. Please contact your Trane Technologies business contact with any questions regarding this Code and/or its applications.

Business Partners are expected to adhere to the following requirements:

### **Legal Requirements**

- Comply with all applicable national, state or regional, and local laws and regulations in the countries in which they operate

### **Discrimination**

- Must not discriminate on the basis of race, gender, religion, ethnicity, nationality, sexual orientation, and/or political beliefs

### **Wages and Benefits**

- Comply with all applicable wage and hour laws and regulations and provide legally mandated benefits

### **Child Labor**

- Must not employ workers younger than the local, legally required minimum age. In the absence of local law, Business Partners shall not employ children under the age of 15 or, in those countries subject to the developing country exception of the ILO Convention 138, shall not employ workers under the age of 14.

### **Freedom of Association**

- Provide employees with the right to freely associate, organize, and bargain collectively within the legal framework of the respective country

### **Limitations on Gifts and Gratuities**

- Neither accept nor give payments or gifts to Trane Technologies directors, officers, employees, or third parties in exchange for business opportunities

### **Forced Labor - Physical Coercion**

- Will not use forced, bonded, indentured or slave labor

### **Antitrust and Competition Laws**

- Comply with all applicable antitrust and competition laws which prohibit agreements or actions that unreasonably restrain trade, are deceptive or misleading, or unreasonably reduce competition without providing beneficial effects to consumers
- Price-fixing, bid-rigging (collusive tendering) and market/customer allocations are all strictly prohibited.

### **Human rights**

- Must not violate basic human rights of life, liberty and security. There shall be no harsh or inhumane treatment, including any sexual harassment, sexual abuse, corporal punishment, mental or physical coercion or verbal abuse of workers.

### **Environment**

- Have an effective environmental policy and conduct their operations in a way that protects the environment
- Obtain and keep current all required environmental permits and meet all applicable environmental rules, regulations and laws in the countries where they do business

### **Health and Safety**



- Provide a safe work environment and conduct themselves in a manner consistent with all applicable safety standards, including governmental requirements, operations- and facility-specific safety requirements, and contractual requirements
- Identify and respond to any public health impacts of their operations and use of their products and services

#### **Anti-Corruption and Bribery**

- Under the U.S. Foreign Corrupt Practices Act and other applicable anti-corruption laws in the countries where we do business, must not give or offer “anything of value” to a foreign government official or employee of a state-owned enterprise, including gifts and hospitality
- Anything of value can include bribes, kickbacks, gifts, entertainment and even contributions to a foreign government official’s favorite charity

#### **No Retaliation**

- Employ a no-retaliation policy that permits workers to speak with Trane Technologies staff without fear of retaliation by supplier management

#### **Confidentiality**

- Keep all agreements and Trane Technologies customer information confidential including pricing and marketing allowances and all Trane Technologies Brand product specifications
- Respect the privacy of our customers and do not share personally identifiable information belonging to our customers

#### **Global Trade Compliance**

- Never seek to mislead or improperly or illegally avoid the payment of import duties, taxes and fees, and never engage in activities meant to evade the legal requirements of international traffic and trade
- Know with whom they are dealing and must not engage in or facilitate business with entities or any other individuals specifically prohibited by law. Furthermore, be aware of, and comply with, restrictions on dealing with entities and individuals located in countries that are subject to trade embargoes or economic sanctions imposed by the United States and other countries where we do business.

#### **Management System**

- Adopt or establish a management system that supports the content of this Code
- Drive continuous improvement in these areas
- Hold their suppliers, contractors, and distributors to these same standards

### **Trane Technologies’ Commitment to Business Partners**

Trane Technologies’ relationships with its Business Partners must be characterized by honesty and fairness. We are guided by the following standards of behavior:

- We will not make payments to any employees of Business Partners to attain lower prices or additional business.
- We will not reveal a Business Partner’s pricing, technology or other confidential information without prior written permission.
- We will not make false or misleading remarks to others about Business Partners or their products or services.
- We will hold our Business Partners to the same standards and expectations to which we hold our own operations and employees.

### **Resolving Code of Conduct or Ethics Issues**



Employees of Business Partners are encouraged to work through their own company to resolve internal ethics issues. However, Business Partners should promptly report violations of this Code or any unethical behavior by a Trane Technologies employee to a Trane Technologies manager or, if that is not feasible, to Trane Technologies' Ethics HelpLine via the online report submission page. Access the HelpLine website by scanning the following QR code with your cell phone:



Except as required by law, persons reporting concerns may request that they remain anonymous. Trane Technologies' Ethics HelpLine makes every attempt to protect the confidentiality of information provided to it — unless maintaining confidentiality would create a significant health, safety or legal risk. Trane Technologies' Ethics HelpLine is available 24 hours a day, seven days a week.

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