

<b>Document Sector:</b>	<b>Corporate</b>	<b>Region: United States</b>	<b>Document #</b> IMP-USA-ENT-121	<b>Rev: 3</b> 9/08/2021	<b>Original:</b> 6/05/2015
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**Corporate Policy:**

It is Trane Technologies’ policy to comply fully with the Customs laws, regulations and policies of all countries where it does business. Trane Technologies recognizes that the United States government and the government of other countries have laws, regulations and policies which control the international movement (import and export) of goods, technology and data. Trane Technologies further recognizes the importance of compliance with these laws, regulations and policies. Failure to comply may result in severe penalties to Trane Technologies and/or individual employees, including monetary penalties, adverse publicity, loss of import/export privileges, delay or seizure of shipments, and in extreme cases, criminal penalties (fines and jail terms).

**Purpose:**

This Supplier Guide for U.S. Imports is in place to ensure efficient and timely delivery of cargo from international supply points to Trane Technologies locations within the United States.

These procedures cannot be interpreted as a substitute for compliance with applicable U.S. Government regulations. Failure to comply with these requirements could result in unexpected delays, unnecessary costs, fines/penalties, inspections and/or seizure of inbound shipments for non-regulatory compliance.

**Scope:**

This policy applies to all U.S. imports. The most current version of the Supplier Guide for U.S. Imports is located on: <https://www.tranetechnologies.com/en/index/company/doing-business-with-us.html>

**U.S. Import Procedures**

All commercial documents for U.S. Imports shall reflect the U.S. Importer of Record (IOR)/Consignee as follows:

<b>Importer EIN#</b>	<b>Importer Legal Entity Name</b>
25-090046503	Trane U.S. Inc. ( Trane Commercial)
25-0900465TC	Trane U.S. Inc. (Trane Residential)
63-058928800	Trane Puerto Rico LLC
39-103987300	Trane Export LLC
41-084529000	Thermo King Corporation
25-120292900	Thermo King de Puerto Rico, Inc
143029-03689	Trane Canada ULC (Non-res. US)
83-290813300	TwentyThreeC LLC

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**Shipping Advice:**

For shipments to the U.S., when Trane Technologies’ companies are the Importer of Record (IOR), we require:

- Email to appropriate U.S. Customs Broker to notify shipment details including:
  - Commercial invoice
  - Packing list
  - Booking details
  - ISF
  - Arrival notice
  - Transportation documentation: Bill of lading; Airway bill of lading
  - Other documents, if applicable (ex. Mill Certificate; EPA; DOT; Anti-Dumping worksheet)
  - Use our [Foreign Vendor Checklist Page 1](#) and [Page 2](#) as a guide

**Commercial Invoice Requirements:**

- Must be in English
- Must be legible, complete, and accurate
- Must include all data elements provided on the Foreign Vendor Checklist above, with a special reminder of the following:
  - Must include the Trane Technologies item number
  - Must include country of origin
- See our [Commercial Invoice Example](#) as a guide

**Importer Security Filing (ISF) Requirements** \*\*Required for ALL OCEAN shipments to the U.S. and Puerto Rico\*\*

U.S. Customs requires an Importer Security Filing (ISF, or 10+2) prior to loading goods on a vessel bound for the United States/Puerto Rico. Failure to comply will lead to penalties of \$5,000 USD per occurrence and up to \$10,000 USD per shipment.

The [ISF Form Page 1](#) and [Page 2](#) must be emailed to Expeditors at [clt-isf@expeditors.com](mailto:clt-isf@expeditors.com) **no less than 72 hours before cargo is loaded onto an ocean vessel.**

**U.S. BROKER NOTIFY PARTIES:**

**NON-U.S. Suppliers (other than Canada/Mexico)**  
 Expeditors International Customs Brokers  
 Attn: U.S. Imports Desk  
 Email: [itsimports-clt@expeditors.com](mailto:itsimports-clt@expeditors.com)  
 Telephone: 704-329-0303  
 Web site: [www.expeditors.com](http://www.expeditors.com)

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**Canadian Suppliers**

Expeditors International Customs Brokers  
 Attn: U.S. Imports Desk  
 Email1: [preadvance-buf@expeditors.com](mailto:preadvance-buf@expeditors.com)  
 Telephone: 810-985-9720

**Mexican Suppliers – Laredo, TX crossing**

Expeditors International Customs Brokers  
 Attn: U.S. Imports Desk  
 Email: [Electronicslrd@expeditors.com](mailto:Electronicslrd@expeditors.com)  
 Telephone: 956-712-1613

**Mexican Suppliers – El Paso, TX crossing**

Expeditors International Customs Brokers  
 Attn: U.S. Imports Desk  
 Email1: [Electronicslrd@expeditors.com](mailto:Electronicslrd@expeditors.com)  
 Telephone: 956-712-1613

**Puerto Rico Suppliers –**

Expeditors International Customs Brokers  
 Attn: U.S. Imports Desk  
 Email: [customs-sju@expeditors.com](mailto:customs-sju@expeditors.com)  
 Telephone: 787-750-7500

**COURIER SHIPMENTS:**

**UPS small parcel/package shipments**

UPS Small Parcel Services Customs Brokers  
 Attn: U.S.A. Imports Desk  
 Email: [UPSUSTRANETECH@ups.com](mailto:UPSUSTRANETECH@ups.com)  
 Telephone: 502-485-2623

**DHL Express small parcel/package shipments**

DHL Express Small Parcel Services Customs Brokers  
 Attn: U.S.A. Imports Desk  
 Email: [priemiercustomercontactteam@dhl.com](mailto:priemiercustomercontactteam@dhl.com)  
 Telephone: 859-817-8339

**Canada Truck return to US shipments with Freight Forwarder DHL Global Forwarding:**

**DHL Global forwarding US broker:**

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Name	Title/Role	Email	Office Direct
Robert Salzmann	Customs Operations Account Analyst	<a href="mailto:robert.salzmann@dhl.com">robert.salzmann@dhl.com</a>	(716) 447-2217
Sherry Hearn	Customs Operations Account Coordinator	<a href="mailto:sherry.hearn@dhl.com">sherry.hearn@dhl.com</a>	(810) 987-0534
Pam Harnden	Customs Operations Supervisor	<a href="mailto:pam.harnden@dhl.com">pam.harnden@dhl.com</a>	(810) 987-0547

**Product Marking:**

All products or their individual packaging must be marked in English with ISO country of origin, the country where the good was manufactured and/or assembled. The country of shipment is not necessarily the country of origin. Origin marking must be in English, and be clear, conspicuous, legible and permanent to indicate to the ultimate purchaser in the United States the English name of the country of origin of the merchandise.

**Assists:**

U.S. Customs requires any assists to be reported at the time of import filing and can be added to one shipment or a number of shipments for a specific period of time. The foreign supplier must first identify any item that was provided free of charge or below market value for use in the production of product for Trane Technologies. Assists can include machinery or parts, molds, raw materials.

**Free Trade Agreement / Government Procurement Requests**

Upon request, our valued Suppliers will provide Trane Technologies with all information and records relating to the purchased products that may be necessary for Trane Technologies to:

- (a) Fulfill any Customs obligations, origin marking or labeling requirements,
- (b) Claim preferential duty treatment under applicable trade preference regimes, and
- (c) Participate in any duty deferral or free trade zone programs of the country of import.

Trane Technologies is legally required to maintain certain documentation and specific data related to products purchased and/or imported into the United States. This documentation may help substantiate key compliance elements such as the harmonized tariff classification and country of origin of the imported products. In order to maintain the data, Trane Technologies may send suppliers solicitation requests on a regular basis. These requests may include but are not limited to any of the following: USMCA, CAFTA, GSP, Chile/Korea/Australia/Colombia-U.S. Free Trade Agreements Certificate of Origin or Manufacturer’s Affidavit/Declaration or Certificate of Origin requests. Your prompt response is critical.

**Export Packaging Requirements:**

All wooden packaging materials (WPM) must be ISPM15 compliant. All WPM must be properly marked to indicate either heat or methyl bromide treatment and marked with the IPPC certification. Wood packing material is

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defined as wood or wood products (excluding paper products, such as corrugated paper cartons) used in supporting, protecting or carrying a commodity (includes dunnage). Wooden packing materials include: Pallets, crates, boxes, packing blocks, drums, cases, skids and pieces of wood used to support or brace cargo.

U.S. Customs and Border Protection requires all containers transiting via ocean vessel are sealed using ISO/PAS 17712 standards. For more information on CBP’s requirements: <https://www.cbp.gov/>

Trane Technologies’ Packaging Guideline: <https://www.tranetechnologies.com/content/cs-corp/en/index/company/doing-business-with-us/packaging-guidelines.html>

**Partnering Government Agencies (PGA)**

**FDA** – Review the Food & Drug Administration regulations to complete necessary requirements for US importation. For imported electronic products subject to radiation control standards, complete [this form](#).

<https://www.fda.gov/Radiation-EmittingProducts/ElectronicProductRadiationControlProgram/default.htm>

**EPA** – The Environmental Protection Agency requires a [Toxic Substance Control Act form](#) to be complete with each import of most chemical goods, water samples, and products that fall under the jurisdiction of the EPA. The EPA also requires an [Engine Declaration form](#) be complete for all imports of engines, vehicles and equipment subject to Federal Air Pollution regulations.

- <https://www.epa.gov/importing-vehicles-and-engines/epa-standard-form-3520-21-importation-engines-vehicles-and-equipment>
- <https://www.epa.gov/tsca-inventory>

**DOT** – The Department of Transportation requires a [Declaration of Motor Vehicles form](#) to be complete with each import of motor vehicles and equipment for motor vehicles.

<https://www.nhtsa.gov/>

**Antidumping Requirements**

Some commodities imported into the U.S. carry duties assessed in addition to the standard tariff rate of duty, called Anti-Dumping or Countervailing Duties. Antidumping duty and countervailing duty orders are related to specific commodities from specific countries. Currently, Trane Technologies imports subject to antidumping include:

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[https://www.usitc.gov/trade\\_remedy/731\\_ad\\_701\\_cvd/investigations.htm](https://www.usitc.gov/trade_remedy/731_ad_701_cvd/investigations.htm)

- ALUMINIUM EXTRUSIONS
- IRON PRODUCTS
- NON-MALLEABLE CAST IRON PIPE FITTINGS
- SEAMLESS REFINED COPPER PIPE and TUBING
- STEEL PRODUCTS
- TAPERED ROLLER BEARINGS
- SOLAR CELLS and PANELS

If the commodity being imported into the U.S. contains any of these products, COMPLETE THE BELOW FORMS:

- [Bearing Products Worksheet](#)
- [Seamless Copper Tubing Worksheet](#)
- [Aluminum Extrusion Worksheet](#)

**Definitions:**

<b>Anti-dumping duty</b>	Selling below home market prices or cost of manufacture with material injury to an U.S. manufacturer is called dumping. Antidumping duties are levied upon further importation of the merchandise.
<b>AWB/BOL</b>	Airway bill or Bill of Lading are negotiable instruments that allow the carrier to transport a merchandise shipment from a shipper to a consignee.
<b>CBP</b>	U.S. Customs and Border Protection is a federal law enforcement agency of the United States Department of Homeland Security charged with regulating and facilitating international trade, collecting import duties, and enforcing U.S. regulations, including trade, drug and immigration laws. <a href="http://www.cbp.gov/">http://www.cbp.gov/</a>
<b>Commercial Invoice</b>	Invoice used for shipping purposes. Commercial invoice must be in English and value in USD.
<b>Country of Origin</b>	The country where the goods were originally produced or manufactured. The country of origin is NOT necessarily the country from which the goods were shipped.
<b>EPA</b>	Environment Protection Agency is an independent U.S. government agency that sets and enforces rules and standards that protect the environment and control pollution. <a href="http://www.epa.gov/oppt/import-export/">http://www.epa.gov/oppt/import-export/</a>
<b>FCC</b>	Federal Communication Commission is an independent U.S. government regulatory agency overseeing all international communications. The FCC acts to maintain the standards and consistency among the ever-growing types of media and methods of distribution, while protecting the interest of both consumers and businesses. <a href="https://www.fcc.gov/">https://www.fcc.gov/</a>

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- FDA** Food and Drug Administration is a regulatory agency of the U.S. Department of Health and Human Services, responsible for protecting and promoting public health.  
<http://www.fda.gov/>
- HTS** Harmonized Tariff Schedule is a 10-digit alphanumeric code assigned to all commodities entering the United States. The HTS coding system was established by the World Customs Organization (WCO).
- Incoterms** International Commercial Terms that identify the trade contract responsibilities and liabilities between buyer and seller.
- IOR** Importer of Record is the owner or purchaser of the goods who is liable for the payment of duties, or an authorized agent acting on the importer’s behalf.
- ISF** Importer Security Filing or 10+2. This is a pre-alert to U.S. Customs that identifies specific data elements prior to loading at the foreign port for all ocean shipments.
- Packing List** Provides a detail of each item contained within the shipment, the piece count and in which package each item is contained. Also identifies the number of packages with the gross and net weight of each.
- PGA** Partnering Government Agency
- WPM** Wood Packing Materials

**Contact Information:**

Trane Technologies U.S. Import Compliance Team, please email: [IRImportCompliance@tranetechnologies.com](mailto:IRImportCompliance@tranetechnologies.com)

For Logistics and Transportation inquiries, please email: [GlobalProcurement@tranetechnologies.com](mailto:GlobalProcurement@tranetechnologies.com)

**Revision History:**

Revision	Date	Description of Change	Modified By
Original	6/5/2015	• Original document released	Alisa Crooks
Revision1	6/4/2018	• Document revised	Beth Wedgworth
Revision1	6/8/2018	• Revised document released	Beth Wedgworth
Revision2	1/29/2020	• Document revised	David Porter
Revision3	6/15/2020	• Document revised	Sarah Blaney
Revision 4	8/25/2021	Removed that invoice and packing list format should be in Excel Removed FCC 740 form requirement Removed imbedded CI example	Heather Hess

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	<ul style="list-style-type: none"> <li>Added in foreign vendor checklist</li> <li>Updated broker contact emails/phone</li> <li>Moved ISF guidance up</li> <li>Added links instead of imbedded documents</li> </ul>	
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