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Dated: 03/01/21	Anti-Bribery & Corruption Policy	Effective: 03/1/2021

I. POLICY STATEMENT

Ingersoll Rand Inc., its subsidiaries and affiliated companies (collectively, the “Company”) are committed to conducting its worldwide operations in accordance with the highest ethical standards and in compliance with all applicable laws and regulations, including the U.S. Foreign Corrupt Practices Act (“FCPA”), U.K. Bribery Act 2010, and other anti-corruption and related laws in countries in which it conducts business. As such, the company's reputation and business success relies on the collective effort of its employee's to follow these standards with the highest integrity.

We expect that same commitment from our agents, consultants, representatives and other companies and individuals acting on our behalf (“Transaction Partners”) as well as those acting on behalf of our Transaction Partners (“subcontractors”) in connection with work for the Company.

II. SCOPE AND DEFINITIONS

A. Scope

This Policy applies to all Company Personnel (defined below) and covers all transactions conducted by the Company and Company Personnel anywhere in the world. This Policy should be read in conjunction with the Company’s Gift, Meals & Entertainment Policy.

B. Definitions

Anything of Value - shall be interpreted broadly, and includes payments or offers of money in any amount (i.e., there is no minimum U.S. dollar threshold) and in any form, including cash, cash equivalents (e.g. gift cards), commissions, brokerages, kickbacks, rebates, loans, or other compensation, as well as gifts, meals, travel and entertainment, political and charitable contributions, in-kind services, courtesies, home repairs, a no-bid contract, internships, temporary employment, contractual rights or interests, other business advantages, and anything else of any economic value.

Bribery - the offer, promise or payment of Anything of Value to a person to improperly influence that person’s views or conduct or to obtain an improper advantage.

Company Personnel – all Company officers, directors and employees, including employees of any affiliate, subsidiary, or other entity controlled by the Company, temporary agency personnel, joint venture partners and all third parties including agents, distributors, suppliers, consultants, and other non-employee agents acting on the Company’s behalf, and contract-basis personnel, wherever located (collectively “Company Personnel”).

Corruption – the abuse of power that involves acting dishonestly or improperly in return for money, personal gain or Anything of Value.

Excessive Travel or Entertainment – Any entertainment or hospitality that is lavish, frequent, not customary, or intended to improperly influence someone can be excessive. For more information, see the

		
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Company's Gifts and Entertainment Policy.

Facilitation Payments – Facilitation payments, or “grease payments”, are small payments made to a Government Employee to prompt a Government Employee to perform or expedite a routine, non-discretionary act that the Government Employee is otherwise required to perform in his or her ordinary duties. Examples of facilitation payments may include payments: to obtain permits, licenses, or visas; to obtain police protection; to receive telephone, utility, or mail services; or to load, unload or inspect cargo.

Government Employee - (i) Any elected or appointed official of any domestic or foreign federal, state, local or municipal government (e.g., presidents, ministers, royalty, members of parliaments or legislatures, governors, mayors, etc.); (ii) directors, officers or employees of any rank or level of a domestic or foreign government, governmental institution, department, agency, or instrumentality, including government-owned or controlled commercial enterprises; (iii) directors, officers, or employees of a public international organization (e.g., bodies affiliated with the United Nations, the World Trade Organization, the World Bank or any other development bank, and the European Union); or (iv) domestic or foreign political parties or their officials, as well as candidates for political office in any jurisdiction.

III. KEY PRINCIPLES

- The Company is committed to preventing corruption, including the appearance of corruption, in all of our business dealings. We have a zero tolerance for bribery and corruption and shall accept no excuses including that bribery is a common practice in a given country. We prohibit all forms of bribery no matter how small. Our policy applies globally.
- All Company Personnel are responsible for understanding and following rules related to giving and receiving hospitality and gifts and shall refrain from giving or accepting hospitality or gifts that improperly influence regulatory or commercial decisions or approvals.
- All of our Transaction Partners are bound by this Policy when acting on behalf of the Company. We are committed to doing business with reputable third parties and will not engage with Transaction Partners who fail to follow our Anti-Bribery and Corruption Policy.
- All Company Personnel are required to report – to the Director, Global Compliance or through the Company's Hotline. – any request for an improper payment or knowledge or belief that an improper payment has been offered or made.

IV. POLICY

A. Anti-Corruption

1. The Company and all Company Personnel shall not directly or indirectly, request, accept, offer, promise, or pay Anything of Value to improperly benefit any person and shall comply with all applicable anti-corruption laws and regulations.

		
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- a. Bribery of a Government Employee: Company Personnel may not directly or indirectly offer, promise, authorize, or pay Anything of Value to any Government Employee, spouse or relative of a Government Employee, or to any other person, knowing or suspecting that all or some portion of the thing of value would be offered, given, or promised for the purpose of inducing the Government Employee to use his or her influence to secure an advantage, or to obtain, retain or direct business to the Company or to any other person or entity.

- b. Commercial Bribery: Company Personnel may not directly or indirectly offer, promise, authorize or pay Anything of Value to any employee, agent, or representative of another company, or to any other person, with the intent to induce or reward the “Improper Performance” (defined below) of a “Relevant Function or Activity” (defined below). Similarly, Company Personnel may not request, agree to receive, or accept Anything of Value from any other person as an inducement or reward for the Improper Performance of a Relevant Function or Activity.
 - (i) “Improper Performance” includes the performance or non-performance of an act, or the making of a decision, in breach of an expectation or duty that the act or decision will be carried out in good faith, in an impartial manner, or in keeping with a position of trust.
 - (ii) “Relevant Function or Activity” includes any function or action that is: (1) of a public nature (i.e., carried out by a private organization on behalf of a public authority); (2) performed in one’s employment or official capacity; (3) connected with a business, trade, or profession; or (4) performed by or on behalf of a government or business entity.

2. The Company and all Company Personnel shall avoid any act or conduct that could be construed or interpreted as a bribe or improper payment.

3. In very rare circumstances, payments may be made on an exceptional basis in situations involving a threat to personal security, including situations that involve a threat of detention or imminent bodily harm to Company Personnel if the payment is not made. Time permitting, pre-approval by the Director, Global Compliance must be obtained however, if not possible, such payments must be promptly reported in writing to the Director, Global Compliance and accurately recorded in the Company’s books.

B. Gifts, Meals and Entertainment

While reasonable and customary gifts and hospitality (including transportation, housing, meals and entertainment) may be appropriate in some situations, they shall not be given or accepted in violation of this Policy’s prohibition on bribery.

Gifts, meals or entertainment should never be given to individuals to obtain or retain business, or to secure any improper advantage. Our Company has implemented safeguards to ensure that giving and receiving gifts and hospitality do not become or appear to become a means to improperly influence a decision maker. For more information, see the Company’s Gifts and Entertainment Policy.

		
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No gifts, meals or entertainment may be provided to a Government Employee without advance approval of the Director, Global Compliance.

C. Travel, Lodging, and Local Transportation

From time to time, guests are invited to visit the Company’s facilities or events sponsored by the Company. The Company permits payment of certain travel and accommodation expenses for business guests in accordance with the Gifts, Meals & Entertainment Policy however, no travel, lodging, or other transportation may be provided to a Government Employee without advance approval of the Director, Global Compliance.

D. Political and Charitable Contributions

Contributions of Anything of Value by the Company or Company Personnel on the Company’s behalf, to a Government Employee or to a charitable organization or cause are not permitted unless approved in advance by the General Counsel, permitted by law, and made to a bona fide organization.

Company Personnel shall not commit to any such contributions unless explicitly authorized to do so by the Director, Global Compliance.

Company Personnel may not make political or charitable contributions, whether in their own name or in the name of the Company, to obtain or retain business or to gain an improper business advantage.

E. Internships/Employment

On occasion, Government Employees or Company business partners may request that the Company provide internships or employment to certain individuals. Offering internships or employment to Government Employees or Company business partners may be viewed as “Anything of Value,” as defined above.

If a candidate is interviewed for an internship or employment within the ordinary course of filling a position, the Director, Global Compliance must be notified of the candidate’s relationship to a Government Employee or Company business partner. If a candidate related to a Government Employee or Company business partner is interviewed outside of the ordinary course of filling a position, any internship or employment offer must be pre-approved by the Director, Global Compliance.

F. Facilitation Payments

Facilitation Payments or “grease payments”, are payments made to a public or government official that acts as an incentive for the official to complete some action or process expeditiously, to the benefit of the party making the payment. Facilitation Payments are completely prohibited and Company Personnel are not permitted to make any Facilitation Payments on behalf or for the benefit of the Company.

G. Third Parties, Agents and Other Transaction Partners

The Company’s business may involve the use of representatives, agents, distributors, dealers, re-sellers, consultants, integrators, customs brokers, freight forwarders and other parties acting, communicating or transacting on the Company’s behalf (collectively, “Transaction Partners”). In many cases, these Transaction Partners act as an extension of the Company’s sales and marketing organization. Due to

		
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this special relationship, we extend our Anti-Bribery and Corruption Policy to our Transaction Partners. There is a possibility the Company may be liable for improper acts or payments made by such Transaction Partners. Therefore, it is important to conduct due diligence on such Transaction Partners and recognize facts that indicate a probability that a corrupt payment may occur.

This Policy should be read in conjunction with the Company's Transaction Party Due Diligence Procedures. The following is a summary:

Due Diligence: Before engaging any Transaction Partner, applicable Company Personnel shall conduct an appropriate level of due diligence to evaluate potential compliance risks and ensure that the Company only enters into business relationships with reputable and qualified third parties.

An Employee seeking to engage a relationship with a Transaction Partner must follow the Company's Due Diligence Procedures and complete the online Internal Due Diligence Questionnaire that, among other things:

- Identifies the countries in which the Transaction Partner will conduct business;
- Describes the services to be provided; and
- Confirms the Transaction Partner's experience and qualifications to perform the contract.

The Transaction Partner, and its sub-contractors (if applicable), are also required to complete anti-bribery & corruption training and an online External Questionnaire that, among other things:

- Discloses any government affiliation of the Transaction Partner;
- Describes any interaction with a governmental agency on the Company's behalf; and
- Confirms the Transaction Partner's commitment to follow all relevant anti-corruption laws.

H. Accurate Books and Records

To prevent bribery from being hidden by incomplete or false documentation, many anti-corruption laws require the maintenance of accurate books, records and reasonable internal controls. The Company and all Company Personnel shall make and keep books, records, and accounts that, in reasonable detail, accurately and fairly reflect the transactions and dispositions of the Company's assets. At a minimum, all financial transactions must:

- occur only with appropriate Company authorization (See Authorizations & Approvals Policy);
- be recorded in accordance with generally accepted accounting principles; and
- be periodically reviewed to identify and correct any accounting discrepancies, errors, or omissions. Secret, unrecorded, or knowingly mis-recorded use of accounts, funds, or assets of the Company is strictly prohibited.

The Company shall also ensure that the appropriate controls are in place to avoid any mischaracterizations or omissions with respect to the Company's assets.

		
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V. TRAINING & MONITORING

A. Training

To ensure understanding of and compliance with this Policy, the Company requires certain Company Personnel to be trained on this Policy. The Company will notify the appropriate Company Personnel of their training requirements as and when appropriate.

B. Monitoring

The Company expects Company Personnel to abide by this Policy. The Company will monitor its business operations to ensure that Company Personnel are acting in conformity with this Policy.

VI. REPORTING & NON-COMPLIANCE

A. Reporting a Violation


If confronted with a request or demand for an improper payment or other violation of this Policy, the request or demand must be rejected immediately and reported. Similarly, if any Company Personnel knows or believes that an improper payment has been or will be made, that individual must also report such payment. Any transaction, no matter how insignificant, that might violate the Policy or applicable law must be reported promptly. Reports or questions about this Policy may be directed to the Director, Global Compliance or through the Company's Global Ethics Hotline. Reports will be treated as confidential to the extent permitted under applicable law, and subject to the Company's ethical obligations. Nothing in here should be construed as limiting an employee's right to report conduct to a government agency or regulator.

The Company's policy is that no adverse employment action will be taken against any Company employees in retaliation for reporting, in good faith, a violation or suspected violation of anti-corruption laws or this Policy.

B. Non-Compliance

Failure to comply with this Policy, the FCPA and other applicable anti-corruption laws can have severe consequences for both the Company and Company Personnel. Violations can result in significant penalties against the Company and can subject Company Personnel to prosecution, criminal fines, and imprisonment, among other penalties. Fines imposed upon individuals may not be paid directly or indirectly by the Company or any business entity for which the individual may have acted. A violation of law may result in significant reputational damage as well. The Company will view any violation of this Policy or applicable law as a significant matter that may warrant disciplinary action, including dismissal for cause, or termination of a contract in the case of a Transaction Partner.

VII. APPROVALS



Vicente Reynal
 President & Chief Executive Officer



Andy Schiesl
 Senior Vice President & General Counsel