

Policy Title: Political Involvement Policy

Effective Date: Updated March 18, 2022

# Policy Purpose

Ingersoll Rand believes in fundamental standards with respect to political involvement that are consistent with our purpose and values and we have adopted this Political Involvement Policy to ensure those standards are understood and followed by all of our employees globally. While local laws or regulation may require a different interpretation or application of this Policy, Ingersoll Rand believes that the fundamental values set forth in this Policy should serve as our minimum business standards in all countries that we operate.

## **Policy and Procedures**

**1.0 Company Contributions to Political Campaigns or Organizations or Lobbying Groups** 

Companies often legitimately represent themselves in legislative, political and public discourse. However, excessive contributions to political campaigns, lobbying expenditures, trade associations and other tax-exempt groups may damage a company's reputation and create risks of corruption. Therefore, Ingersoll Rand does not make contributions to political campaigns or organizations or lobbying groups whose primary role is to influence political campaigns or public policy and legislation. In furtherance of our purpose to *Lean on Us to Help You Make Life Better*, Ingersoll Rand does from time to time contribute to trade associations and tax-exempt entities who we believe support that purpose, but whose primary focus is not lobbying. However, it is possible that these associations and entities may engage in incidental, ad hoc lobbying activities from time to time. In this context, a "contribution" is defined as an amount given during a fiscal period to an individual candidate, organization, ballot measure, or "issue area" or "topic" requiring lobbying efforts.

2.0 Employee Contributions to Political Campaigns or Organizations or Lobbying Groups

Ingersoll Rand encourages employees to become involved with their communities. However, political activities must be conducted on one's own time outside of work. Employees must not promote candidates or distribute political material on Company property. No employee is authorized to make political contributions in the name of the Company without the express approval of the Legal Department.

# 3.0 Gifts to Government Officials, Spouse or Relative

The Company requires employees to be aware of, and comply with, the legal and ethical requirements of the gift giving practices in the country in which you are doing business. The rules governing the provision of gifts to government officials are stricter than the general rules governing the provision of gifts as outlined in the Ingersoll Rand Code of Conduct. Employees are strictly prohibited from offering anything of value, including cash, cash equivalents, political and charitable donations, in-kind services, meals, travel and entertainment, gifts, or anything else of economic value to any government employee, spouse or relative of a government employee, in order to secure an advantage for the Company.

### **4.0 Political Action Committee**

Ingersoll Rand does not have a Political Action Committee (PAC).



# **5.0 Promoting Policy Enforcement**

Ingersoll Rand believes that the ability to enforce a policy is as critical as the adoption of the policy. To promote the enforcement of this Policy, Ingersoll Rand will communicate its publication and will periodically conduct relevant training to all employees. Violations of this policy will result in disciplinary action, up to and including termination of employment. Employees who believe this Policy has been violated are encouraged to report immediately the suspected violations through the Company's Ethics Hotline.

No retaliatory action will be tolerated against anyone who raises concerns about possible violations of this Policy. Except where restricted by local laws, each employee is required to cooperate in any internal or external investigation of suspected wrongdoing.

#### **Policy Owner**

The Policy owners are the Senior Vice President and General Counsel, and the Global Compliance Director. Questions, comments, issues and concerns should be directed to Robert Mayfield (<u>Robert.mayfield@irco.com</u>). The Policy owners have accountability for the Policy including communication, updates and training related to the Policy.

Requests for exceptions, changes or modifications to the Policy should be directed in writing to the Policy owners.

#### **Policy Disclaimer**

The terms of this Policy may be amended, modified or terminated at any time, with or without prior notice. The most current version of the Policy supersedes all prior versions of the Policy. Nothing in this Policy creates a contract of employment or any contractual obligation, express or implied, to an employee or employees. Interpretations of this Policy are within the exclusive jurisdiction of the Company. The Policy is intended to align with the Company's Code of Business Conduct and will be read together so as not to provide duplication of benefits to any employee or group of employees.

### **Public Reporting**

Ingersoll Rand publicly reports information on the Company's annual total monetary contributions to and spending for trade associations and other tax-exempt groups, as part of our annual Sustainability Report. This reporting cross-references the UN Guiding Principles Reporting Framework.

#### **Policy Review**

This document contains the date of initial approval of the policy as well as dates of approved substantive and editorial changes over time. Our Compliance office performs an annual review of the policy, which allows for an ongoing due diligence as risks may change overtime and the operating context might evolve.