



Code of Conduct for Business Partners

Allegion 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 Allegion Code of Conduct for Business Partners ("Code") sets Allegion's 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 Allegion and its operating subsidiaries, affiliates and divisions, including merchandising affiliates of Allegion.

The highest legal, moral and ethical standards of honesty, integrity and fairness are to be practiced in the conduct of Allegion's affairs. In order to meet this standard, Allegion expects each of its Business Partners to operate and act in full compliance with this Code and all applicable laws and regulations. Allegion 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 Allegion.

Allegion 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 Allegion 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 five parts: Core Values, Employee Code of Conduct, Responsibility of Business Partners, Allegion's 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 Allegion holds itself and Allegion's expectations of its Business Partners' actions.

Our Core Values

Allegion can be most successful when we work towards a common purpose and share common values. Our shared culture helps us consistently act in the best interests of our customers, our shareholders, our communities and ourselves. This shared culture is based upon a set of Values:

Serve others, not yourself

Do the right thing

Be curious beyond the obvious

Have a passion for excellence

Enjoy what you do and celebrate who we are

Be safe, be healthy

Be empowered and accountable

This is your business, run with it.

Employee Code of Conduct

Allegion holds all of its employees, officers, and directors, when they are acting in connection with their official Allegion duties, to the policies set forth by the Allegion Code of Conduct, available online at www.allegion.com.

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 Allegion 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 Allegion. 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. Allegion reserves the right to amend this list of responsibilities. Please contact your Allegion 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 Allegion 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 Allegion staff without fear of retaliation by supplier management

Confidentiality

- Keep all agreements and Allegion customer information confidential including pricing and marketing allowances and all Allegion 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

Allegion's Commitment to Business Partners

Allegion's 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

Alllegion has many resources available to guide employees in ethical and compliance situations. Employees wishing to seek guidance or to report concerns may do so by discussing the issue with a manager, supervisor, Human Resources representative, the Chief Compliance Officer or by contacting the Ethics HelpLine via the email address, internet address, or telephone numbers listed below.

Note: For the United States and Canada the Helpline can be accessed directly by dialing 855.807.3267.

For all other countries, dial the access code shown below and then enter 855.807.3267 when prompted.

Email: EthicsandCompliance@allegion.com

Telephone: 8558073267

Access Codes *: Australia - Optus 1-800-551-155

Australia - Telstra 1-800-881-011

Austria - 0-800-200-288

Belgium - 0-800-100-10

Chile - ENTEL 800-360-311

Chile - Telefonica 800-800-288

Chile - Telmex 800-225-288

China - North, Beijing CNGC 108-888

China - South, Shanghai - China Telecom 10-811

China - China Telecom 108-10

Colombia - 01-800-911-0010

Czech Republic ** - 00-800-222-55288

Denmark - 800-100-10

France - France Telecom 0-800-99-0011

France - Telecom Development 0805-701-288

Germany - 0-800-225-5288

Hong Kong - Hong Kong Telephone 800-96-1111

Hong Kong - New World Telephone 800-93-2266

India - 000-117

Ireland *** - 1-800-550-000

Italy - 800-172-444

Mexico - 01-800 288-2872

Mexico - Por Cobrar 01-800-112-2020

Netherlands - 0800-022-9111

Panama - 800-0109

Poland - 0-0-800-111-1111

Russia - outside Moscow 8-495-363-2400

Russia - outside St. Petersburg 8-812-363-2400

Russia - St. Petersburg 363-2400

Russia - Moscow 363-2400

Singapore - SingTel 800-011-1111

Singapore - StarHub 800-001-0001

Spain - 900-99-0011

Switzerland - 0-800-890011

Taiwan - 00-801-102-880

Turkey - 0811-288-0001

United Arab Emirates - 8000-021

United Kingdom - British Telecom 0-800-89-0011

United Kingdom - C&W 0-500-89-0011

United Kingdom - NTL 0-800-013-0011

* If the access code shown for your country changes, please go to <http://www.business.at.com/bt/acess.jsp>

** Not available from cellular phones

*** From Northern Ireland use UK British Telecom access code

Online: Submit a confidential report through the internet at www.allegion.com/helpline.