



BUSINESS PARTNER CODE OF CONDUCT

Allegion plc and its subsidiaries are committed to responsible business practices and living out our Core Values. Our Core Values include the following, among others:

- Do the right thing
- Be curious beyond the obvious
- Have a passion for excellence
- Be safe, be healthy

We recognize that our Business Partners, including agents, distributors, dealers, contractors, suppliers, vendors, service providers, intermediaries, joint venture partners, and others, play an important role in our overall success.

To reinforce the values and standards to which we are committed, this Allegion Code of Conduct for Business Partners ("Code") sets out the expectations and standards for doing business and applies to all Business Partners.

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. 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.

What does this Code require me to do?

The following describes the responsibilities of Business Partners transacting 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:

LABOR & HUMAN RIGHTS

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

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.

Non-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.

Forced Labor - Physical Coercion - Will not use forced, bonded, indentured or slave labor.

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

No Retaliation - Employ a no-retaliation policy that permits workers to speak with Allegion staff without fear of retaliation by supplier management.

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.

ETHICAL BUSINESS PRACTICES

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.

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.

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.

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.

Accuracy of Business Records - All financial books and records must conform to generally accepted accounting principles. Records must be accurate, legible, and transparent.

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.

Conflict of Interest - Business Partners should avoid interactions with Allegion employees that might conflict, or appear to conflict, with that employee acting in the best interests of Allegion. If a Business Partner is a family member or has any other business relationship with an Allegion employee that might represent a conflict of interest, this should be disclosed to the Legal Department.

HEALTH, SAFETY & ENVIRONMENT

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

MANAGEMENT SYSTEMS

Business Partners shall adopt or establish a management system that supports the content of this Code. They will have a training program that achieves an appropriate level of knowledge and skills to address Allegion expectations and develop appropriate business continuity plans. They will also 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.

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.

What can I do if I need help or want to report a concern?

Allegion has many resources available to guide you in ethical and compliance situations. Third party contacts wishing to seek guidance or to report concerns may do so by discussing the issue with Allegion by sending an email to ethicsandcompliance@allegion.com.

Internet

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

Mail

11819 N. Pennsylvania Street, Attention: Chief Compliance Officer, Carmel, Indiana 46032 USA

Telephone

If you would like to report an ethics or compliance concern to our independent Ethics HelpLine, you can do so by telephone or online by following the instructions below. Please use the number for the country you are calling from, not the country where the incident occurred.

Country	Phone Number
Australia	0011 800 1777 9999
Austria	Reverse Charge +1-720-514-4400
Belgium	00 800 1777 9999
Canada	800 461 9330
China	00 400-120-3062
Colombia	01 800 518 1863
Denmark	00 800 1777 9999
France	00 800 1777 9999
Germany	00 800 1777 9999
Hong Kong	001 800 1777 9999
India	000 800 100 3428
Ireland	00 800 1777 9999
Italy	00 800 1777 9999
Korea, Republic of	002 800 1777 9999
Luxembourg	00 800 1777 9999
Mexico	001 866 376 0139
Netherlands	00 800 1777 9999
New Zealand	00 800 1777 9999
Panama	001 800 204 9188
Poland	00 800 111 3819
Russian Federation	8-800-100-9615
Singapore	001 800 1777 9999
Spain	00 800 1777 9999
Sweden	00 800 1777 9999
Switzerland	00 800 1777 9999
Turkey	00-800-113-0803
United Arab Emirates	8000 3570 2714
United Kingdom	00 800 1777 9999
United States of America	800 461 9330