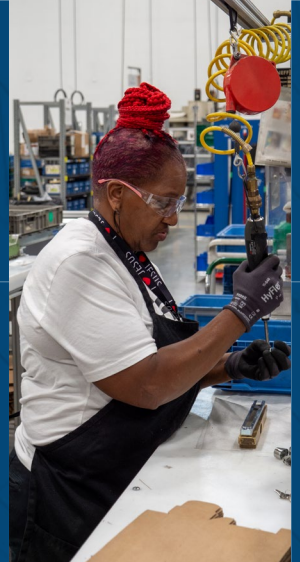




# The Allegion Business Partner Code of Conduct

Partners in Pioneering Safety  
and Living Our Values



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Some of  
the places  
we call home

Munich  
Germany



# A message to our Business Partners

Allegion is known for helping millions of people and businesses navigate their toughest security challenges. We recognize that our Business Partners play a critically important role in our success. It's with your help and commitment to the highest standards of service, safety and quality that we maintain our reputation as a leader in global safety and security.

Our Business Partner Code of Conduct ("Code") provides a framework for being **Partners in Pioneering Safety and Living Our Values** and solidifies the bond of trust between our company, our customers and our Business Partners. It spells out the expectation that each of our Business Partners will reflect our values and act with integrity, always following the laws wherever they operate. Everyone, everywhere who represents Allegion has a responsibility to know and follow our Code.

Once you read the Code, you'll be prepared to handle a variety of situations that might come up during your engagement with us – and to get help when you need it. You'll also know how to speak up when something violates our Code, values or the law.

Thank you for your commitment to Allegion's Code and values and for helping us pioneer safety and security with integrity each day.



Some of  
the places  
we call home

Cincinnati  
USA

# Our values

■ We expect our Business Partners to share and reinforce these values, which form the foundation of Allegion's culture:



## Serve others, not yourself.

Help the people you work around and be a good corporate citizen by doing more for the communities in which you work and live.



## Do the right thing.

Act honorably. If you hear an inner voice telling you that something is wrong, don't ignore it.



## Be curious beyond the obvious.

Be continually interested in everything, everywhere, and keep pioneering – in your work life and in your personal life.



## Have a passion for excellence.

Make Allegion a better company – and make yourself a better employee and person.



## Enjoy what you do and celebrate who we are.

Bringing together our experiences and individuality makes Allegion stronger.



## Be safe, be healthy.

Promote good safety and health habits, inside and outside the office.



## Be empowered and accountable.

Give yourself and others the tools needed to succeed.



## This is your business, run with it.

Your work is important. Question process. Cut out inefficiency. Look for ways to continually improve our business.

Some of  
the places  
we call home

Bangalore  
India



# We meet expectations

## Working with integrity

Safety and security are priceless commodities – they are basic human needs that we fulfill every day at Allegion. Over a century of hard work and innovation has gone into building our company and trust in our brands – it's a legacy we are committed to protecting. With the help of our agents, distributors, dealers, contractors, suppliers, vendors, service providers, intermediaries, joint venture partners and other Business Partners, we can preserve that legacy, support our customers and communities and create stronger and safer products.

That's why we expect every Business Partner, in every aspect of our operations and supply chain, to follow our Code. Think of it as your guide to doing business with Allegion. It will help you reflect our deeply held values and meet our expectations, over and above any other contractual agreements such as supply, agent and distribution agreements and purchase orders.

Throughout our partnership, Allegion expects you to:

- Maintain the highest legal, moral and ethical standards of honesty, integrity and fairness.
- Operate and fully comply with this Code and all applicable laws and regulations.
- Hold **your** Business Partners as well as affiliates and subcontractors to the same standards when they provide goods or services for Allegion.
- Establish a management system that supports our Code and train your workforce to uphold Allegion's expectations and maintain business continuity.

Keep in mind, Allegion may revise this Code or assess your compliance at any time. Contact your Allegion business contact if you have any questions about what is required.

## Complying with laws and regulations

As a company with global operations, we are committed to following the national, state or regional and local laws and regulations that apply wherever we operate and expect our Business Partners to do the same. If the Code ever differs from local laws, remember, we follow the stricter standards unless doing so would violate local law. If you're not sure how to reconcile conflicting requirements, we expect you to seek guidance and authorization before you proceed.

Complying with our Code and the law is the minimum standard you must uphold. Allegion takes violations seriously – we reserve the right to pursue legal or other remedies (including termination of our contract) against any Business Partner who violates our standards or the law when doing business on our behalf.

## Cooperating with investigations and audits

An important part of demonstrating your compliance with our Code and applicable laws is helping us look into any potential misconduct or violations. That includes cooperating with any investigation, inspection or audit conducted by Allegion or other authorities, including government entities. In situations like these, we expect you to be transparent and provide all requested information and any other supporting documentation that may be needed.

Some of  
the places  
we call home

Indianapolis  
USA

## Sharing concerns

At Allegion, we're committed to doing the right thing and speaking up for what's right. When we do, we create an environment where everyone's voice is heard, including our Business Partners. By listening to your concerns, we are better able to identify and promptly resolve any issues that could violate our Code or the law.

For that reason, we encourage our Business Partners to come forward any time they have questions about our Code or any other concern. And if you see or suspect a violation of our Code or the law in connection with your work with Allegion, we expect you to come forward and share them with us.

Allegion has many resources available when you need help or want to report a concern. Discuss the issue with your point of contact at Allegion. You may also share your concern via:



### Email

[EthicsandCompliance@allegion.com](mailto:EthicsandCompliance@allegion.com)



### Mail

Chief Compliance Officer  
Allegion plc  
11819 N. Pennsylvania Street  
Carmel, Indiana 46032  
United States of America



## Our Ethics HelpLine

This service is available to you 24/7 and is operated by an independent organization. You may submit your report anonymously, where permitted by law. The Ethics HelpLine is accessible:

### BY PHONE

In the U.S. and Canada, call toll-free, 800-461-9330

### ONLINE

[allegion.com/helpline](https://allegion.com/helpline)

Allegion handles all reports fairly and discreetly. We also investigate them promptly. We only disclose report information to those who need to know in order to investigate and resolve the issue.

## No retaliation

Allegion strictly prohibits retaliation against anyone who reports an issue in good faith. Our Business Partners must do the same, ensuring that every individual is free to speak with Allegion staff without fear of retaliation.



# We promote a safe, secure, inclusive workplace

## Keeping out harassment and discrimination

Allegion believes every individual deserves to work in an atmosphere of respect – free from offensive, hostile or intimidating behavior. We do not tolerate acts of discrimination or harassment, such as bullying, sexual harassment or other abusive verbal or unwanted physical conduct anywhere in our operations. We also expect our Business Partners to maintain the same positive environment in their workplaces. To help prevent discrimination and harassment, carefully follow all applicable laws and treat everyone with whom you interact as you would want to be treated: with dignity and respect.

## Promoting inclusion and equal opportunity

We proudly promote an inclusive culture, where diversity is reflected across our business, as we strive to create a workplace where all people feel welcomed, respected and valued. We expect our Business Partners to do the same.

To ensure equal opportunity, Business Partners must carefully follow employment laws in the countries where you operate. Business Partners are expected to prohibit discrimination; create opportunities for individuals with varied perspectives and backgrounds; and base employment-related decisions on needs and requirements rather than personal characteristics, such as race, color, age, sex, ethnicity, physical disability, sexual orientation, religious affiliation, veteran status, marital status, political belief, work experience, gender identity,

ancestry, disability, socio-economic status, nationality and other factors protected by law or local policy.

## Maintaining health and safety

Nothing is more valuable to Allegion than people, so we focus on protecting them – every person at every location, including those in our Business Partners' operations. We rely on you to support our efforts by providing a safe work environment and following all applicable safety standards, including governmental and contractual requirements and operations- and facility-specific safety requirements. Also work to promptly identify and respond to any public health impacts of your operations or the use of your products and services.



Some of  
the places  
we call home

Dublin  
Ireland

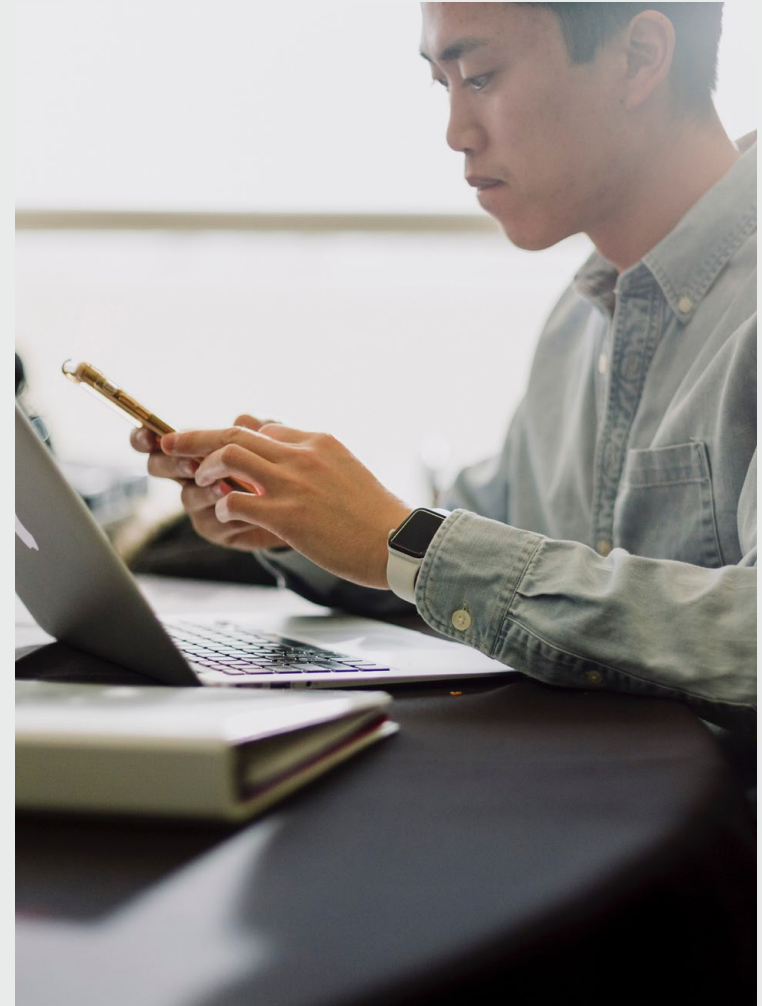
# We are responsible and ethical partners

## Securing confidential information and intellectual property

Allegion's success – just like every other business today – is driven by information and innovation. That is why we are committed to protecting confidential information (such as customer agreements and information on pricing, marketing and sales, technology and product specifications) and intellectual property (the ideas and information that make companies unique, such as trademarks, patents, trade secrets and copyrights). We also expect you to treat this information with extreme care, always following information security policies and contractual and legal requirements. That includes:

- Only using confidential information and intellectual property for legitimate business purposes
- Never disclosing this information to third parties without approval
- Practicing good cybersecurity to prevent unauthorized or malicious disclosure
- Upholding any non-disclosure agreements that apply
- Never stealing or improperly using intellectual property
- Using our brand, logos and other brand marks properly

As part of Allegion's commitment to our Business Partners, we will never reveal their pricing, technology or other confidential information without prior written permission.



Some of  
the places  
we call home

Ensenada  
Mexico



## Keeping personal data private

We take privacy seriously and understand our responsibility to protect any personal data we handle. We expect you to share this responsibility and protect personal data or Personally Identifiable Information (collectively, “PII”), whether it relates to or belongs to Allegion employees, our customers, or any other Business Partners with whom we interact. Never share PII with anyone who is not authorized, and let us know immediately about possible breaches or unauthorized disclosures. Also, you agree to follow all data protection, cybersecurity, and privacy laws, regulations and rules that apply, including, but not limited to, the General Data Protection Regulation (GDPR) and the California Privacy Rights Act (CPRA). It is up to you to:

- Only process Allegion PII if you have prior, written instructions (i.e., a data protection agreement) – and follow them carefully.
- Use special care with cross-border transfers of PII, adopting appropriate measures to comply with regulations and requirements.
- Know and follow our [Terms and Conditions for Allegion Data Processing and Transfer](#), which helps you:
  - Identify the various types of PII.
  - Follow instructions and country-specific requirements to protect it.
  - Protect PII outside of the European Union (EU).
  - Comply with the special requirements protecting the PII of German residents.
- Never engage another processor (a “subprocessor”) without Allegion’s approval; if approved, hold them to the same data protection standards and remember, you are responsible for their actions.



- Ensure that anyone who is authorized to handle PII is committed to confidentiality.
- Take appropriate technical and organizational measures to protect PII.
- Notify Allegion immediately of possible breaches or disclosure of PII.
- Follow Allegion’s instructions and applicable laws to delete, return or properly store PII, (including copies), after our engagement ends.

## Knowing the rules about gifts and entertainment

Allegion believes business relationships should be based on mutual trust and cooperation and never influenced by inappropriate offers. We expect our Business Partners to use care in any exchange of gifts, meals, entertainment or travel, as these offers could create a real or perceived conflict of interest. Know the applicable laws and requirements in the countries where you do business, and never offer or accept anything that could give the appearance of something improper.

Gifts are anything of value, including meals or entertainment (if the person offering it is not attending). Some examples are bottles of wine, products, tickets to entertainment or sporting events, lodging, services, equipment, prizes, transportation or reimbursement of travel expenses, use of vehicles or vacation homes, home improvements and special discounts.

Appropriate gifts are:

- Offered to serve a legitimate business purpose
- Reasonable, customary and appropriate (valued at no more than \$50 USD unless you receive prior approval from Allegion's Regional General Counsel or Chief Compliance Officer)
- Permitted under local law and both parties' policies
- Open, transparent and accurately recorded
- Infrequently offered (not more than once in a 12-month period)

Gifts should NEVER be:

- Offered to Allegion directors, officers, employees or Business Partners in exchange for certain decisions, benefits or business opportunities
- Offered to government officials

## Avoiding conflicts of interest

Part of being a good Business Partner is being objective – never getting involved in situations that could affect the decisions that you (or an Allegion employee) make on our behalf. Situations like these are conflicts of interest, which can harm our partnership and damage your credibility and reputation. Never try to improperly influence an Allegion employee or do anything yourself that might conflict (or appear to conflict) with Allegion's best interests. This includes situations where a Business Partner is a family member or has another business relationship with an Allegion employee. If you are aware of any situation that could cause (or potentially cause) a conflict of interest, you have an obligation to immediately disclose it to Allegion's Legal Department.

## Maintaining honest and accurate records

We know when our records are reliable and accurate, we make better decisions for our business. Accurate and transparent records strengthen both Allegion and our relationships, and we expect our Business Partners to help us maintain financial and operational integrity. When you create or handle business records, always comply with applicable laws, regulations and generally accepted accounting principles. Record all transactions accurately, legibly and transparently, and never make, or pressure others to make, false or misleading entries in any record or document related to Allegion or our business.



## Guarding against fraud, waste and abuse

Allegion is committed to the integrity of our business and our industry. As part of this commitment, we expect our Business Partners to help us identify and prevent instances of fraud, waste and abuse. Recognize that fraud involves intentional misconduct for personal gain, while waste and abuse involve misusing or mismanaging resources – or using your position for personal gain. Always ensure that payments and transactions are properly authorized and fully and accurately recorded in compliance with applicable laws. Also watch for and report misconduct such as accounting irregularities, bills for services that weren't provided, forged signatures, missing documentation or manipulation of accounting records.

## Safeguarding company assets

It takes a variety of valuable resources to conduct Allegion's business. We are committed to protecting these assets and expect our Business Partners to do likewise. Our assets include our equipment, facilities and vehicles, raw materials, electronic assets like computers and software, confidential information, intellectual property, financial assets and the Allegion name and logo. If you handle any of these resources during your engagement with us, use them responsibly and protect them from misuse, theft and fraud. Never use them for personal gain or in a way that violates the law or our values.



## Ensuring product quality and safety

One of the things that makes Allegion a trusted name is our commitment to the highest standards of service, safety and quality. We never allow a product to leave our facilities that doesn't conform to those standards. Because our Business Partners contribute to our products, we expect you to share that commitment by:

- Following all procedures and processes to meet Allegion's quality and safety specifications, including governmental and company quality standards
- Helping us ensure that Allegion products sold globally conform to all applicable product safety laws and regulations
- Never taking shortcuts or any actions that could compromise the quality or safety of our products
- Identifying and minimizing potential risks by addressing problems transparently and honestly and implementing safe and responsible solutions
- Staying focused on safety, prevention and a culture of continuous improvement

# We follow the law

## Preventing bribery and corruption

Allegion is committed to doing business with integrity. That includes conforming to the highest ethical standards, upholding all applicable laws and avoiding corruption in all its forms. We will never make payments to our Business Partners' employees to attain lower prices or new business. We expect you, our Business Partner, to maintain similar high standards. Implement policies to make sure you comply with anti-bribery and anti-corruption laws, including the US Foreign Corrupt Practices Act (FCPA), the UK Bribery Act (UKBA) and other applicable laws wherever we do business. Never offer anything of value to a government official or employee, including bribes, kickbacks, gifts, entertainment or charitable contributions, and never offer to pay bribes or facilitation payments on Allegion's behalf.

## Working with government

A variety of special legal, regulatory and contractual requirements apply to our government work, so we act honestly and transparently in all government interactions. As our Business Partner, you must do the same, knowing and following the rules that apply to our government contracts, which involve bidding, accounting, invoicing, subcontracting, employment practices, protection of government property, purchasing and more. When dealing with the government:

- Be accurate.
- Comply with contract specifications.
- Cooperate with any investigations.
- Protect classified and confidential information.
- Never offer a government representative anything of value.
- Ask questions if any requirement is unclear.



Some of  
the places  
we call home

Melbourne  
Australia



## Avoiding insider trading

Allegion promotes fairness in all we do, including in investing. We believe no one should have an unfair advantage. When you work as our Business Partner, you might learn information about Allegion or other publicly traded companies that hasn't been released to the general public (meaning it's "non-public") and could influence an investor's decision to buy, sell or hold securities (meaning it's "material"). When you are aware of material non-public information, also known as "inside information," never trade in securities or disclose that information to others to inform their investment decisions (an act known as "tipping"). Doing so could violate securities laws and result in serious legal and reputational consequences.

## Complying with global trade laws

Allegion is proud to serve customers around the world, but doing business globally means complying with a variety of import and export regulations. We expect our Business Partners to help us honor our customer commitments and know and uphold all applicable laws related to the cross-border transfer of goods, services or technology. You have a responsibility to:

- Never attempt to avoid paying import duties, taxes and fees or complying with trade requirements.
- Know who is involved in every transaction, and never do business with a business, entity or individual specifically prohibited by law.
- Never deal with businesses, entities or individuals that have been embargoed or sanctioned by the United States and other countries where we do business.
- Be complete and accurate and obtain all necessary licenses and approvals.
- Screen all transactions to ensure compliance.

## Guarding against money laundering

We want to make sure that Allegion's products, services and our good name are only used for legitimate business purposes. Part of that effort is keeping money that's been earned through crimes, including terrorism, from being moved or "laundered" through our business to make it appear legitimate. Our Business Partners have an obligation to help by being familiar with money laundering laws, knowing who is behind all transactions and making sure you only do business with reputable third parties. Watch for and report warning signs of money laundering, such as attempts to pay invoices in cash, suspicious fund transfers or requests to ship products to places other than the place of payment.

## Competing fairly

At Allegion, we believe in free and fair competition. We won't engage in illegal activities that unreasonably restrain trade or give us an unfair advantage, and we market our products with honesty and integrity. Our Business Partners must do likewise, complying with all applicable antitrust and competition laws and avoiding agreements with competitors that involve price fixing, bid rigging, division of customers or markets, refusal to sell to or buy from particular entities or other abusive behavior. To ensure ethical marketing, sales and advertising for Allegion, always be truthful – never make promises we can't keep or false or misleading claims about our products or our competitors. We do the same for you, never disparaging your products or services.

# We respect the world around us

## Upholding human rights

Allegion is committed to upholding fundamental human rights and believes every person, everywhere in the world, should be treated with dignity, fairness and respect. We do not condone degrading or unfair work conditions or the use of forced, bonded, indentured, slave or child labor and expect our Business Partners to follow our lead. To help keep these abuses out of our operations:

- Follow all national, state, regional and local human rights laws and regulations in the countries where we operate.
- Never employ workers younger than the local, legally required minimum age.
- Comply with all applicable wage and hour laws and regulations and provide legally mandated benefits.
- Prohibit forced, bonded, indentured or slave labor and human trafficking.
- Promote the right to freely associate, organize and bargain collectively, in line with local law.
- Promote a diverse workforce, reasonable working hours, fair wages and safe working conditions.
- Watch for and report potential violations of workers' human rights, such as inhumane treatment, sexual harassment or abuse, corporal punishment, physical coercion or mental, physical or verbal abuse.

## Committing to the environment

We recognize our responsibility as a company to protect our communities and our planet and operate a clean and sustainable business. Our Business Partners are an extension of our global workforce, and we rely on you



to help us make choices that minimize our impact on the environment. That includes following all applicable environmental laws, regulations and standards and having an effective environmental policy in place. It also includes conducting your operations in a way that protects the environment, obtaining and keeping current all required environmental permits and immediately reporting any situation connected to your operations that could threaten the environment.

## Sourcing ethically

Our Business Partner relationships are a critical extension of our business. Your actions and the way you operate reflect on us, so we must ensure that you share our commitment to ethical business practices. Honor that commitment by operating ethically in every aspect of your business, including the way you source supplies, parts, components and raw materials. Ensure that you're working with ethical Business Partners. Also help prevent the use of conflict minerals (which have been linked to funding for groups engaged in violence and human rights atrocities) from being used anywhere in our operations. Follow all applicable laws aimed at providing conflict-free minerals.





## Supporting our communities

Every day, Allegion strives to be a good community partner and corporate citizen by working to improve and support our local communities around the globe. Our Business Partners can play an important role by helping us identify local needs and make a genuine difference where they live and work. When offering community support, whether as an organization or as individuals in your organization, make sure your activities align with the law as well as our values, and never create a conflict with Allegion. That includes never using Allegion time or resources to support your efforts or offering your support in our name without prior authorization.

## Getting politically involved

Allegion recognizes that political involvement is a good way to positively impact the communities where we live, and we respect the right of each individual to participate, including our Business Partners and their employees. However, we expect you to engage responsibly and respectfully in political activities, never allowing your activities to interfere with your duties to Allegion. Also, do not involve Allegion in your political efforts or use our resources or name to support particular candidates or causes. If you wish to contact government officials or engage in lobbying efforts to influence legislation, remember, the rules for doing so are strict. Never lobby on Allegion's behalf without first consulting our Legal Department.



## Closing message

Trust is central to who we are at Allegion and everything we do. It's what enables us to build our reputation, our relationships and our future. But to have trust, we know you must first have integrity. It happens when every individual contributing to our business shows integrity in every action.

Your role as our Business Partner couldn't be more important. We only succeed when you remain committed to working in a way that reflects our values and upholds the law and our Business Partner Code of Conduct. By reading our Code, you have taken a critical first step.

Thank you for your commitment – it matters more than you know to Allegion and everyone we serve. Together, as **Partners in Pioneering Safety and Living Our Values**, we will raise safety and security standards around the world for generations to come.

