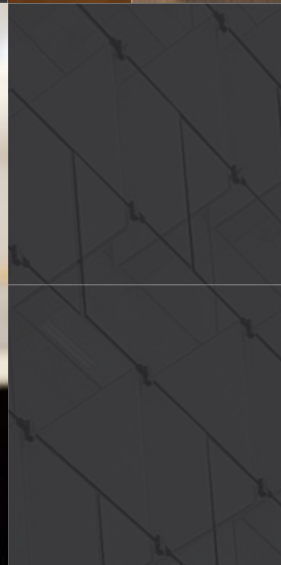


# The Allegion Code of Conduct

Pioneering Safety and  
Living Our Values



# A message from our CEO

**Dear Allegion team,**

“We create peace of mind by pioneering safety and security.”

Embedded in our mission – the reason we exist – is the promise that people can trust Allegion to give them peace of mind. We work hard every day to uphold that promise. Our products protect millions of people all over the world, in the places where they live, learn, work and visit. This mission is only possible because of you and your dedication to the highest standards of service, safety and quality that make Allegion a trusted name.

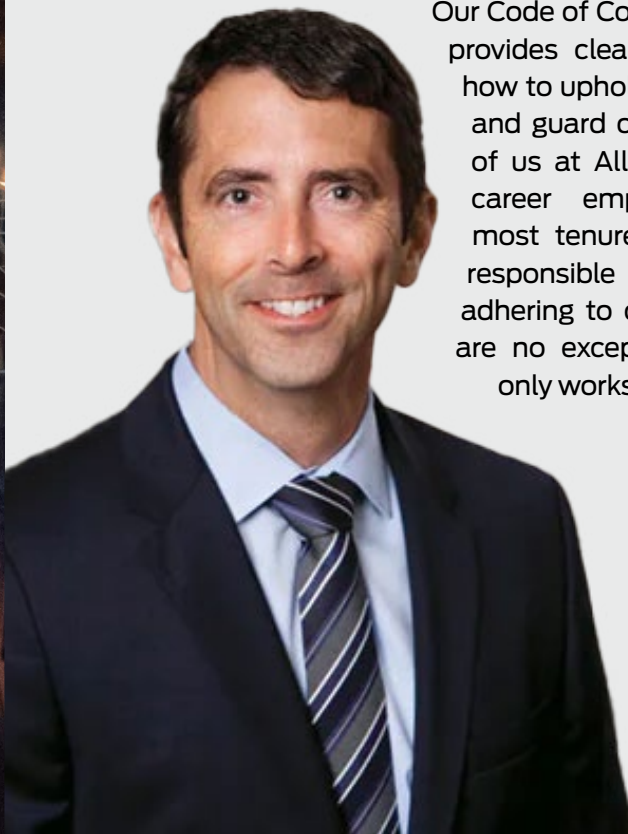
Our Code of Conduct (our Code) provides clear instructions on how to uphold our core values and guard our reputation. All of us at Allegion, from early career employees to the most tenured executive, are responsible for knowing and adhering to our Code – there are no exceptions. Our Code only works if we all follow it.

We have a responsibility to follow the law and do the right thing in every situation. Our Code solidifies our ethical commitments, creating a bond of trust and helping us avoid the serious penalties of failing to do what's right. We depend on you to raise concerns and our non-retaliation policy ensures you won't face consequences for speaking up. In fact, when you report suspected violations, you are upholding Allegion's reputation for honesty and integrity and protecting the people who depend on us for their safety and security.

Get to know our Code and be sure you're following it. Ask questions if you don't understand or are unsure of something. Adhere to our values. Speak up when you feel that our Code, policies or the law have been violated. By doing these things, you're preserving our rich legacy and steering a course for continued success.

John H. Stone

President and Chief Executive Officer



Some of  
the places  
we call home

Cincinnati  
USA



## Our values

■ Allegion is most successful when all employees work toward a common purpose and share our common values. This shared culture helps us act in the best interests of customers, shareholders, communities and ourselves.

Our culture is based on these values:



### 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

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Some of  
the places  
we call home

Munich  
Germany



# We follow our Code

Our Code reinforces our values, puts our policies into practice and provides a practical resource for working honestly, ethically and with integrity.

Some of  
the places  
we call home

Indianapolis  
USA



## About our Code

■ Allegion strives to be the global pioneer in safety and security. We have a vision to make the world safer, and our brands reflect that commitment. However, we also strive to be a leader in doing what's right. This Code details Allegion's core values, reinforces our commitment to lawful and ethical conduct and applies to all of our officers, employees and directors (referred together in the Code as "employees").

Our Code guides our business relationships with customers, suppliers and each other. It also emphasizes what's expected of Allegion by shareholders, government regulators and the communities we serve. All Allegion employees must get to know our Code.

Our company spans almost 130 countries. We follow the law wherever we do business and comply with the standards of business conduct set forth in our Code. If you encounter a situation in your work where a local custom, practice or set of guidelines conflicts with our Code, follow the more restrictive requirement.





# How to use our Code

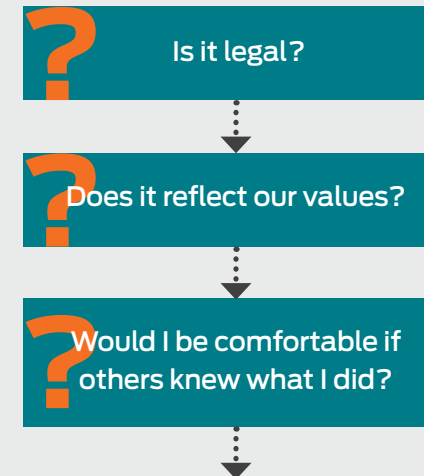
We want to protect the places that matter, and that starts right here at Allegion. As an employee, you have a responsibility to:

- Read and understand the Code and all updates.
- Comply with the letter and spirit of the Code.
- Seek guidance from an appropriate resource if you're unsure about what to do.
- Promptly report known or suspected violations using procedures described in the Code.
- Cooperate with internal investigations of reported Code violations.

Keep in mind, no code can cover every possible legal or ethical issue. However, our Code does detail Allegion's core values and helps you think through issues that you face in order to reach the right decision. The Code will also direct you to more detailed company policies and procedures to help you address ethics and compliance issues.

## What if the right path is not clear?

If you are ever in a situation that is not covered by our Code or our policies or procedures, ask yourself:



If you can answer “yes” to all three questions, moving forward is likely okay. However, a “no” or “not sure” answer to any question should cause you to stop and seek help. It is always appropriate, in any circumstance, to ask the Legal Department before you act.

Code waivers may be granted, in writing, in limited circumstances. Waivers for executive officers or directors require Board approval.

If the Code is revised, we will notify you. Please familiarize yourself with any changes. If you have difficulty accessing the policies referenced in the Code, contact Human Resources.



## Violations of our Code

We know you want to do what's right, but we also know the correct course of action isn't always crystal clear. That's why we want you to ask for help. If a Code violation happens, there can be consequences. Violations may result in disciplinary action, up to and including termination (where permitted by law). Conduct that may result in discipline includes:

- Actions that violate our Code, policies or the law.
- Requesting, encouraging or permitting others to violate our Code, policies or the law.
- Failure to promptly report known or suspected violations.
- Failure to fully cooperate with company investigators or auditors.
- Retaliation against another employee or third party for making a report or cooperating with a company investigation.
- For managers: failing to use reasonable care to prevent or detect a violation or failing to demonstrate leadership and diligence needed to ensure Code and policy compliance.

Our Chief Compliance Officer will be notified before any permanent disciplinary action is taken unless the violation relates to a human resources issue (such as violations of our substance abuse or sexual harassment policies) or environmental health and safety issues.



# Responsibilities of managers

Managers have an even greater responsibility. If you are a manager, you are expected to:

- Promote lawful and ethical behavior, show respect, and be open to employee questions and concerns.
- Monitor Code and policy compliance of employees you supervise, and ensure employees are aware of Code revisions and updates.
- Demonstrate a commitment to the Code through your words and actions.
- Ensure those you supervise complete required compliance training.
- Seek new ways to communicate the Code and policies.
- Ensure employees know where and when to make reports for violations, free from retaliation.

As a manager, one of your most important responsibilities is responding appropriately to employee questions and concerns. Please ensure that you:

- Listen carefully: Thank the person for making the difficult decision to speak up, even if you disagree with them. Listen closely to what they have to say and show that you're focused on resolving the issue.
- Maintain confidentiality: To the extent possible, protect the individual's privacy. Avoid discussing the conversation with others on your team.
- Be objective: Continue to treat all team members with the same degree of fairness even if they've reported a concern or are the subject of the report.
- Escalate to the right channels: While you may be tempted to take ownership of the concern, you must assess whether it needs to be escalated to HR or Legal. If you have questions or aren't sure if you can resolve a concern on your own, consult with your HR partner.



# Sharing concerns

■ Allegion is global, and it is one team. We want everyone to succeed. If you see or suspect a violation of our Code, or if you have a question about the right course of action, speak up.

You may contact any of the following resources for help:

- Your manager
- Local management
- Your local Human Resources partner
- Our Legal Department
- Our Chief Compliance Officer
- Our Ethics HelpLine

For contact information and special reporting information for employees in the European Union, see the [Resources](#) section at the end of the Code.



## Unlock Our Policies

For additional information please see the Speaking Up Policy and the Global Whistleblower Policy.



## Our Ethics HelpLine

Our Ethics HelpLine is available 24/7 and staffed by an independent organization. To contact the Ethics HelpLine in the U.S. and Canada, call toll free: 800-461-9330. You may also report online: [Ethics Helpline](#).

When you contact the Ethics HelpLine, an interviewer will document your report in detail. Unless otherwise provided by local law, you do not have to give your name – although providing your name may assist the investigation. If you remain anonymous, you will receive a reference number at the end of your call or online report. This will allow you to call or log back in to add information or find out if Allegion has further questions for you to assist in the investigation.

Please report incidents immediately. Failing to take action on a possible violation in a reasonable time may lessen our ability to correct the issue in an effective and timely manner and may expose the company to liability.



## Zero tolerance for retaliation

■ Allegion believes that it is essential to maintain a culture that empowers employees to internally speak up on matters of genuine concern without fear of retaliation; and be assured that their concerns will be taken seriously, properly investigated, and kept confidential to the extent possible.

Allegion values the help of employees who identify potential issues that the company needs to address. Any employee who reports a violation will be treated with dignity and respect and will not be subjected to any form of discipline or retaliation for reporting in good faith. Retaliation against anyone who provides information or otherwise assists in an investigation or proceeding regarding any conduct that the employee believes in good faith constitutes a violation of applicable laws or regulations, our Code of Conduct, or Allegion's related policies is prohibited and will, in itself, be treated as a violation of our Code.

That an employee has raised a concern honestly, or participated in an investigation, cannot be the basis for any adverse employment action, including separation, demotion, suspension, loss of benefits, threats, harassment or discrimination. If we work with someone who has raised a concern or provided information in an investigation, we should continue to treat the person with courtesy and respect. In case we are being subject to retaliation, we must report it to the Legal Department.

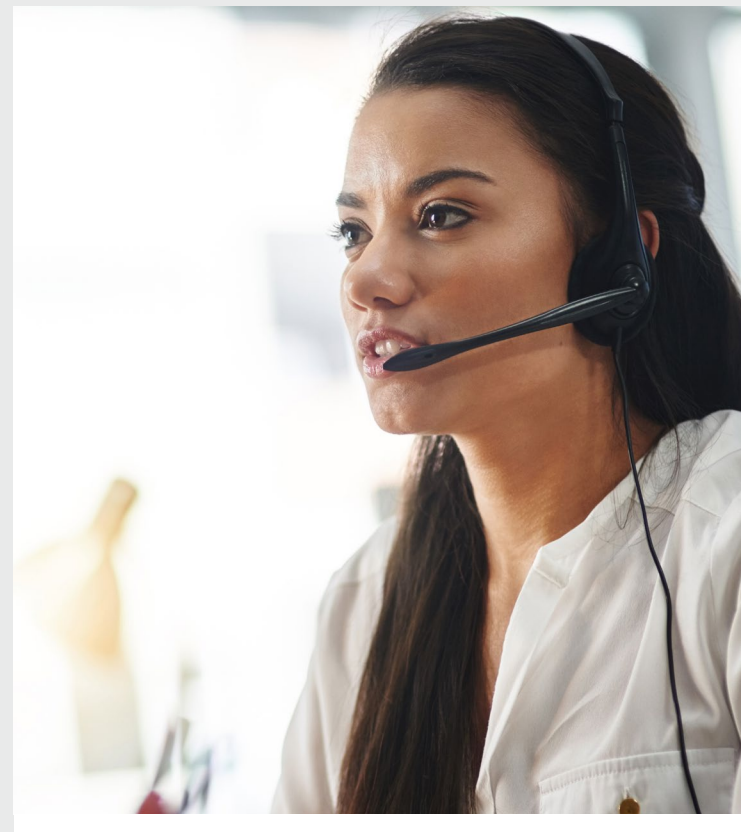


## Investigating misconduct reports

■ At Allegion, we aim to conduct business with the highest standards of ethics, honesty and integrity. Each of us is responsible for preventing the violation of this Code and reporting concerns about any improper action or wrongdoing by Allegion, its employees or other stakeholders.

Allegion believes that any employee with knowledge of wrongdoing should not remain silent. Even when we don't have all the details related to our concern, we are expected to report it with the reassurance that Allegion will treat it seriously, fairly and promptly.

Allegion will also take the necessary action in response to violations of our Code or other unacceptable conduct such as invoking employment consequences including termination and notifying authorities if appropriate under the circumstances.





Our Legal Department has established processes and procedures to ensure that all internal investigations are conducted by qualified personnel who have been trained to conduct investigations lawfully, promptly, thoroughly, professionally, fairly and confidentially. Upon receiving a report, they:

- Engage only the necessary partners to evaluate the reported concern.
- Keep all information strictly confidential to the best extent they can.
- Treat everyone involved in the internal investigation with dignity and respect.
- Provide regular updates to the reporter to the best extent that they can.
- Take prompt and appropriate action if the report is substantiated and notify those involved in the investigation.
- Conduct all investigations and any resulting corrective action in compliance with local law, applicable Allegion policies and any required workers' representation consultation requirements.



## Stop & Think

**What should I do if my manager asks me to do something that I think is wrong?**

Take time to evaluate the situation based on your knowledge of our values. Consider this course of action: First, review our Code. Next, you may wish to ask your manager, another manager or Human Resources for guidance. You may also seek guidance from another resource mentioned above. After following these steps, if you still believe what you have been told to do is wrong, don't do it.

**We set goals we're supposed to achieve, and sometimes I feel pressured to violate the Code to reach them. Is this acceptable?**

No. While we strive to meet goals to ensure continued business success, you should never violate the law, the Code or Allegion policies to achieve them.



# We promote a safe, secure, inclusive workplace

Our commitment to keeping people around the world safe and secure and maintaining an inclusive working environment starts with a commitment to respecting each other.

Some of  
the places  
we call home

Dublin  
Ireland



# Creating a positive work environment

■ Allegion values the health and safety of our employees and is committed to maintaining an inclusive environment for all employees. It's one of our core values and our success depends on it.

Our employees are on the front lines of safety. Be mindful of health and safety concerns. If you notice something that violates health or safety laws or endangers employees, immediately notify facility management, your Environment, Health and Safety (EHS) representative, the Vice President of EHS & Remediation or the [Ethics HelpLine](#). We also rely on each and every employee to ensure our work environment is respectful and inclusive, and free from harassment and discrimination.

## Health and safety

No matter where in the world you work, follow Allegion's safety policies. If you ever have a question, ask!

Make sure you know and follow all health and safety requirements for your job. If you need to file a health and safety report, make sure it is complete and accurate.

If regulatory agencies need to be involved in a situation you are dealing with, you must contact the Legal Department.

Allegion values a safe work environment. Threats, acts of violence and physical intimidation are strictly prohibited. No talk of violence or joking about violence will be tolerated. Do not bring handguns or other weapons on our premises, even if you are licensed to carry such a weapon.

## What if I'm asked to take an action that may endanger myself or others?

If you are ever asked to ignore safety regulations or bypass a safety precaution or procedure, ask yourself:

- Will taking this action put myself or others at risk?
- Is this action a violation of our Code or the law?

If you answered "yes" to either of these questions, stop what you're doing and seek guidance. Being careful is never the wrong approach.

## Use good judgment when it comes to medications and alcohol

Don't come to work or perform your duties under the influence of drugs or alcohol. They can impair judgment and put others at risk. The use, sale, manufacture, solicitation, distribution, possession, receipt or transportation of alcohol, illegal drugs, controlled substances for which no prescription has been issued and the abuse of legally prescribed prescription medications are strictly prohibited on company property, in a company vehicle or while an employee is engaged in company-related business (unless the possession and/or consumption of alcohol is authorized in connection with a company-sponsored event).

Medications prescribed to you by a doctor can also affect your ability to do your job safely. Don't attempt to work if your judgment is impaired or if you're unable to do your job safely.



## Key Point

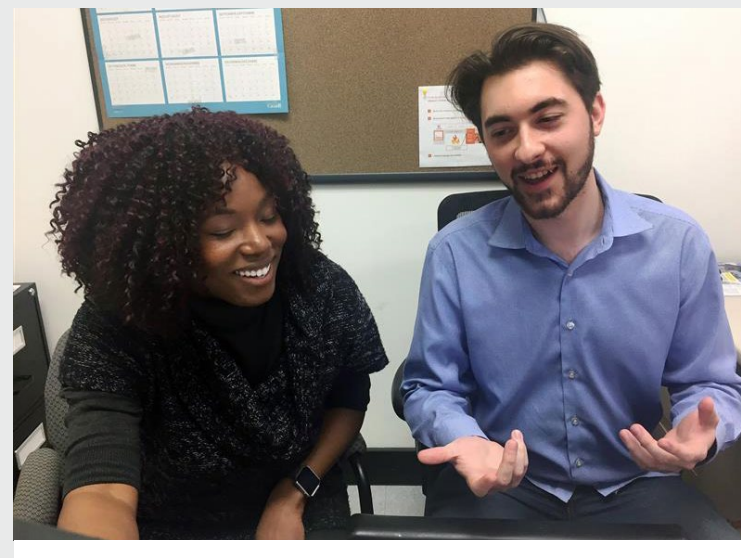
- **Be responsible**
  - Intoxication and excessive drinking are prohibited at company-sponsored events.
  - Never report to work, drive or do your job while under the influence.
- **Be ready**
  - Allegion may conduct drug screens on employees.
  - Depending on the law, you may be asked to test.
- **Be proactive**
  - If you suspect a co-worker is abusing drugs or alcohol, share your concerns with your manager, local Human Resources, or the Ethics HelpLine.
  - For more information, check the Code and our policies.



## Stop & Think

**I suspect a co-worker may be abusing his prescription medications. What he's taking is not illegal, so should I tell someone?**

Yes. Abusing legally prescribed drugs can be just as dangerous as abuse of illegal substances. It can even be a violation of the law. Share your concerns with your manager, Human Resources or the Ethics HelpLine.



## Inclusive culture

Allegion has and aims to sustain a high-performing and inclusive culture, which is underscored by our values like “do the right thing” and “celebrate who we are.” We believe that we perform at our best when our work environment brings together our team members’ varied experiences and individuality. This inclusive environment further helps us attract and retain the best talent and reach even higher levels of employee engagement and customer satisfaction.

Diversity is valued in all aspects of our business, as we strive to create a workplace where all people feel welcomed, respected and valued. We believe attributes like talent, character, ability and integrity are well-distributed and, therefore, opportunity should be as well.

Each of us is responsible for creating a culture of trust and respect that promotes a positive and inclusive work environment.



This means treating each other with fairness and courtesy in all of our interactions in the on-site and virtual workplace. Best practices for leading the way include:

- Treat others the way you want to be treated.
- Assume positive intent and seek to understand rather than leaning on assumptions.
- Share your perspectives and opinions confidently even when they are different from that of others.
- Be open to the perspectives and opinions of colleagues and take full advantage of what they have to offer. Different approaches can help you make the most informed work decisions.
- Understand that all of us are individuals with unique experiences and struggles; be willing to listen and help.
- Speak up when you or your colleagues are being harassed or discriminated against.

## Equal opportunity

Having a diverse workforce – made up of team members who bring a wide variety of skills, abilities, experiences and perspectives – is essential to our success. We are committed to the principles of equal employment opportunity through the following means:

- We base all employment-related decisions purely on company needs, job requirements and individual qualifications.
- We comply with all applicable employment laws, rules and regulations.
- We adhere to equitable policies and principles in all aspects of employment, including activities relating to recruiting, hiring, benefits, leaves of absence, training, transfer, promotion, job assignments, compensation, corrective action and termination.

## Anti-discrimination/anti-harassment

Allegion values an inclusive workplace. We expect you to treat fellow employees with dignity and to maintain an atmosphere of respect. Unlawful discrimination and harassment are not permitted.

When you harass or discriminate against someone, you devalue that person and Allegion's name and integrity. We'll do whatever it takes – at all levels – to protect employees from a workplace that is offensive, hostile or intimidating. If you see or suspect this kind of behavior, it is very important that you speak up. Examples of unacceptable behavior include:

- Any unwelcome behavior, such as verbal or physical conduct designed to threaten, intimidate or coerce.
- Verbal taunting (including inappropriate jokes or language).
- Negative stereotyping.
- Racial, ethnic, gender or religious slurs.
- Unwelcome sexual advances, requests for sexual favors or unwelcome demands for dates.
- Sharing of sexually oriented messages, emails or media.
- Other verbal or physical conduct of a sexual nature in which: submission to the conduct is either an explicit or implicit term or condition of employment; or submission to or rejection of the conduct by an individual is used as the basis for making employment decisions, including advancement, affecting such individual (known as "quid pro quo," or "this for that").

## Be careful with workplace relationships

Intimate personal relationships between managers and subordinates must be disclosed as a conflict of interest. This includes a dating relationship where one person is subject to the other's scope of supervision or work status. Immediately disclose personal relationships by updating your conflicts of interest form online.



## Unlock Our Policies

For additional information please see the Global Harassment and Discrimination Policy.



## Key Point

- Value and respect workplace diversity.
- Seek a wide range of perspectives and opinions.
- Do your part to maintain a harassment-free workplace.
- Avoid sexual harassment, offensive statements or gestures, and the display of sexually oriented materials.



## Stop & Think

A co-worker told me that a customer constantly tells her sexually themed jokes. She doesn't want to speak up about it because she doesn't want to offend or risk losing the customer or having her territory reassigned. I want to help, but isn't it her responsibility to say something?

Not necessarily. If your colleague is comfortable doing so, she should tell the customer the jokes are offensive and need to stop or else she'll make a report. If the behavior doesn't stop, or your colleague won't tell someone, then you should report the situation to the Legal Department or Ethics HelpLine. We don't tolerate this behavior from anyone – employees, customers or other third parties.



# We preserve our reputation

People know and respect our good name and value the products and services we provide – in every interaction and every transaction, we work to maintain the reputation we’ve worked so hard to earn.

Some of  
the places  
we call home

Ensenada  
Mexico

# Keeping confidential information secure

■ Information Security, Data Privacy and Intellectual Property is the heart of any business, including ours. Treat these with care.

Protecting Allegion's confidential and sensitive data is everyone's responsibility. Protect Allegion's information security policies, data privacy policies and intellectual property and confidential information at all times. Treat all sensitive Personally Identifiable Information (PII), confidential information and intellectual property, including that of third parties and competitors, like you would your own. PII is any information that identifies or can identify an individual, directly or indirectly, such as name, email address, government identification number, account number, medical information, and user ID and password. Be sure to protect PII and use it and intellectual

property for business purposes only, and don't disclose it or any confidential information to third parties without prior company approval. Consult the Legal Department before transferring personal information across country borders, as some countries restrict such transfers.

Employees may be asked to sign non-disclosure agreements to ensure confidentiality of certain business transactions. Our company strictly enforces these non-disclosure obligations and employees may be disciplined for breaching their non-disclosure obligations, up to and including termination.

Take care when handling confidential and sensitive data and the personal data of others that you have been entrusted with. Be aware that cross-border transfers of PII of employees or customers, are heavily regulated. Any questions regarding the cross-border transfer of employee or customer PII should be referred to the [Chief Privacy Officer](#).



## Intellectual property includes:

- Patents
- Trademarks, including all our brand names and logos
- Copyrights
- Trade secrets







## Key Point

### • Keep it legal

- Use software according to license agreements.
- Don't steal others' intellectual property.
- Don't change or alter our brand marks and logos without permission.
- Contact **Corporate Communications** with questions about the Allegion brand and other brand marks, guidelines and logos.

### • Keep it ethical

- Don't use unethical practices to discover competitor information.
- Don't use competitor information to gain an unfair advantage.

### • Keep it private

- Protect our intellectual property from unauthorized use.
- Don't share company intellectual property or confidential information outside the company without prior approval from the Legal Department.
- Don't leave intellectual property exposed on desks or computers.

### • Keep it secure

- Secure all paper copies in locked cabinets.
- Don't write down your passwords or share passwords with others.
- Log off your computer completely when not in use.
- Immediately report lost or stolen laptops, cellphones or data files via the process documented at Lost/Stolen Device Investigations. Also contact your manager, the **Chief Privacy Officer** and the Chief Information Security Officer to report the incident.



## Stop & Think

I use my laptop or smartphone while out of the office so that I can get work done. Sometimes I work in view of customers, suppliers, visitors and other employees. What should I do to keep information secure?

Stolen electronic devices are one of the most common ways confidential information is lost and data privacy is breached. Always secure and lock laptops and phones and lock your screen if you leave your computer unattended. If you're traveling, don't leave your laptop or phone in plain sight in a vehicle. Make sure you use secure networks.



# Safeguarding company assets

■ Our people are our most important asset, but there are other critical resources that help us to do the work that we do. Protecting these assets not only drives our productivity but also preserves our competitive advantage in the marketplace.

Use our assets for company business and protect them from misuse, theft and fraud. You should not use them for your personal financial gain or the gain of family, friends or other third parties.



## Our assets include:

- The Allegion name and logo
- Physical assets, such as our buildings, equipment, vehicles and tools
- Raw materials (including scrap and obsolete materials)
- Electronic assets, such as our phones and computers, hardware and software, email, voicemail and internet access
- **Confidential information and intellectual property**
- **Financial assets** such as company credit cards, P-cards and cash





## Use Company assets responsibly

Occasional, personal use of company electronic assets is permitted, but make sure you know and follow the rules for your location based on our Acceptable Use of Technology Policy. Your use should never interfere with your work or the work of others, and it should never violate company policies or the law.

In accordance with applicable local law, you should not have any expectation of privacy while using company assets. Anything you create, send, receive, download or store on company property or systems belongs to the company, and we reserve the right to access, monitor or search company property, to the extent permitted by applicable local law, to ensure their safety and security.



## Unlock Our Policies

For additional information please see the Acceptable Use of Technology Policy.



## Key Point

- **Protect our brand**
  - Find more information about our branding strategies and standards on The Grid.
  - Contact **Corporate Communications** with questions about the Allegion brand.
- **Protect our property**
  - Report any property or equipment that is unsafe, damaged or in need of repair.
  - Don't lend, sell or give away our assets unless you're authorized to do so.
- **Protect our systems**
  - Ensure the physical security of hardware that's assigned to you.
  - Follow our computer and network security policies to prevent unauthorized access. Safeguard your password(s).



## Stop & Think

I walked by a co-worker's desk at lunchtime and noticed she was visiting a website that I consider inappropriate. Maybe I'm just too sensitive. Is it okay to visit inappropriate websites as long as it doesn't interfere with your work, and you don't share them with others?

No. Our electronic systems should never be used to access inappropriate websites or information. Share your concerns with your manager, Human Resources or the Ethics HelpLine.

# Avoiding conflicts of interest

■ Conflicts arise when you put your personal, social or financial interests ahead of the business interests of our company.

Your interests or relationships outside of work should not interfere with your job or create a conflict with Allegion. Examples might include taking part-time work with a competitor or favoring a family member in a competitive bidding situation. If you think you may have a conflict, or you're ever unsure, let your manager know immediately. You must disclose all actual or potential conflicts of interest through our online disclosure tool at Disclosure Report.



## Key Point

Conflicts can take many forms:

- Family and personal relationships at Allegion: supervising a family member or friend
- Outside business interests: directly investing in a competitor
- Business opportunities: taking advantage of information you learned about through your work at Allegion or starting a competing business
- Board memberships: employing, consulting, or serving on the board of a competitor, customer, supplier, or other service provider







### Is it a conflict?

Ask:

- Does it interfere with my Allegion duties?
- Am I using Allegion's resources or relationships for monetary gain?
- Would this look like a conflict to someone else?
- Does it compete with Allegion's interests?

If the answer to any of these is "yes," then stop, look for ways to avoid the conflict if possible and ask for help.



## Stop & Think

**My co-worker's son has been hired for a job in our department. Is this a conflict?**

Occasionally, relatives work in the same department. We must ensure pay, promotions, raises, job evaluations and other employment-related actions are handled by a non-relative and the situation is monitored. Conflicts can arise when working with spouses, friends or family members and should be disclosed.

**I am thinking about getting a second job at a restaurant. Is this allowed?**

Yes, as long as it doesn't prevent you from carrying out your Allegion job requirements. You should discuss it with your manager and ensure your outside interests (with work, investments and suppliers) do not conflict with Allegion's interests.



## Unlock Our Policies

For additional information please see the Conflicts of Interest Policy.

## Working with suppliers

■ Allegion is committed to working with suppliers that engage in legal, ethical business practices, and ensuring that our selection of goods and services is based on quality, technology, delivery, price, service, performance and need.

Avoid any appearance of a conflict that could interfere with your ability to make independent decisions on company purchases. This includes accepting gifts or entertainment from a supplier that violates our policies or could be considered a bribe.



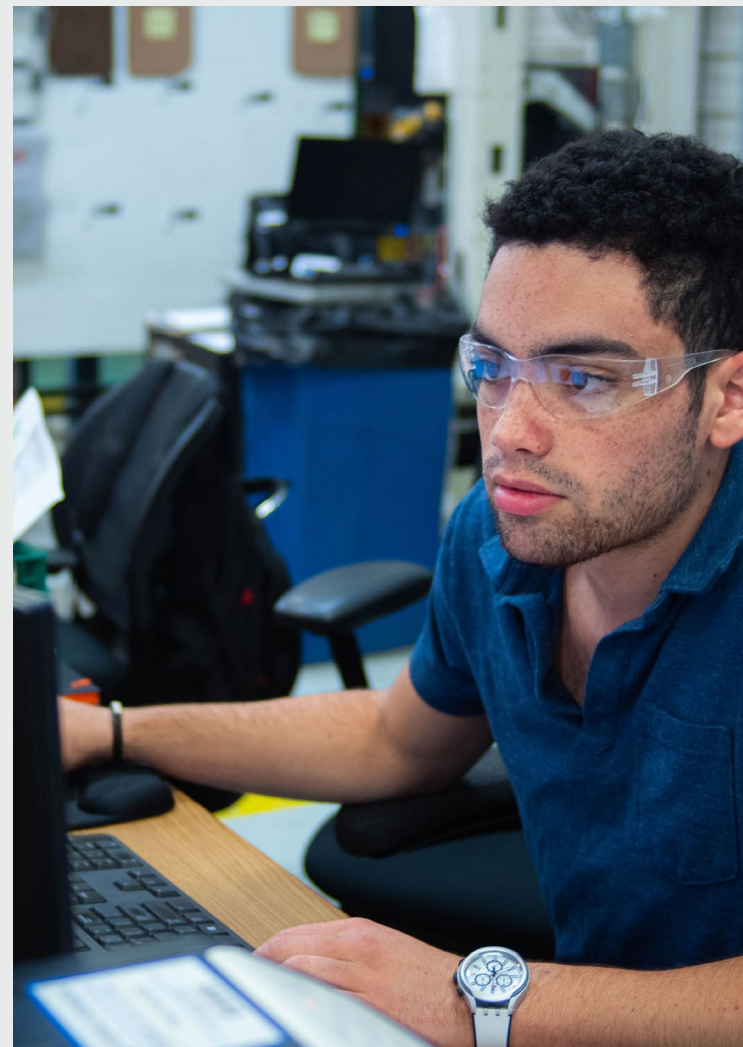
### Stop & Think

**A supplier trying to gain Allegion business invited me on an all-expenses-paid trip to discuss opportunities with our company. Can I go?**

No. Even though the intention is to discuss business, it may appear to an outsider that the trip created a conflict of interest.

**Can I attend an industry conference if a supplier pays for travel and hotel expenses?**

An industry conference fee may be waived or paid for by a sponsor or supplier, but you may not accept commercial transportation, lodging or other expenses, as they could suggest something improper.



### Unlock Our Policies

[Global Supplier Portal](#)

[Business Partner Code of Conduct](#)



# Knowing the rules about gifts and entertainment

■ While gifts and entertainment can strengthen business relationships, they can also create potential conflicts. We win business on merit and the value of our products, and we award business based on quality, delivery, price, service and need.

Acceptable gifts are reasonable in value, related to a legitimate business purpose, are provided infrequently, and are not in the form of cash or a cash equivalent. While modest gifts and entertainment – such as bringing in lunch for a business meeting with a supplier – may be acceptable, be aware of risks.

Rules regarding gifts for government officials (including their families) are even more strict. **Never provide anything of value to a government official without prior approval from the Legal Department or Chief Compliance Officer.**



## Key Point

- **Know the meaning**
  - Gifts can include **anything of value**, including meals, wine, tickets or discounts.
  - A gift can be a bribe if it's intended to gain a business advantage.
- **Know the limits**
  - Gifts you offer or accept must be infrequent and valued at no more than US\$50.
  - Don't accept gifts in excess of US\$200 from the same company within a 12-month period.
  - Avoid gifts during competitive bidding.



## Avoid:

- Excessive gifts that strain company resources.
- Sexual or inappropriate gifts and entertainment.
- Bribes or gifts that could create the appearance of conflict.



## Stop & Think

**What if I receive a gift in excess of the limit described in our policies?**

Return the gift and explain our policy. You may also contact the Legal Department for further guidance if returning the gift is not possible or would embarrass the giver.

**Can I accept a meal or tickets to a sporting event from a supplier?**

If you attend with the supplier, it is business “entertainment.” Although not subject to a specific dollar amount, ensure the entertainment is consistent with acceptable business practices for your industry or location, infrequent and not lavish. If the supplier does not attend with you, the tickets are a “gift” and are subject to a limit of US\$50.

**Can I give gifts with the Allegion logo on them?**

Generally, yes. Gifts such as branded pens and hats create brand awareness and can promote goodwill. If you’re ever unsure, seek guidance before providing the gift.



## Unlock Our Policies

For additional information please see the Gifts, Meals, Entertainment and Donations Policy.





# Communicating responsibly

■ Whether you are engaging the press, investors or the public, it's important to remember that what you say can have a global impact on our employees, our brand and our bottom line.

## **Do not speak to the media on behalf of the company, unless authorized**

Employees must not answer questions received directly from the media. Refer such requests to Corporate Communications. Never speak to the press, investors or the public about Allegion's finances or business decisions unless authorized to do so. Before you speak on behalf of Allegion or provide expert opinion based on your role at our company, ensure that what you say is authorized and consistent with our policies and the law.

## **Forward legal documents**

If you receive legal documents intended for Allegion (such as a subpoena or official regulatory correspondence), forward them immediately to the Legal Department. Also, let Legal know if you're ever contacted formally or informally by a government law enforcement representative regarding Allegion business.

Cooperate with Allegion's Legal Department at all times. If you're asked a question, be truthful and accurate in your response. Preserve documents that may be subject to an investigation.



## Be careful on social media

Social media gives us new and exciting ways to engage customers, colleagues and the world – helping us build and solidify relationships. When you use social media, do so in line with our Code and social media policy.

We support your right to speak out publicly about matters of public concern or engage in certain activities related to the terms and conditions of your employment. Nothing in this Code or in any of our policies is intended to limit or interfere with the right to engage in concerted activities protected under Section 7 of the National Labor Relations Act, such as discussions related to wages, hours, working conditions, health hazards and safety issues.

However, when posting on social media, disclose your relationship to Allegion. Respect all rules and policies related to confidentiality, proper clearance for content and official statements.

Keep your social media use at work to a minimum and never use social media to harass, intimidate or discriminate against other employees or competitors. Remember: Think before you post and if you are in doubt, check with HR or Corporate Communications.



## Unlock Our Policies

For additional information please see the Social Media Policy and the Corporate Communications Media Relations Policy.



## Key Point

- Never speak to the media, investors or the public about Allegion business, unless authorized.
- Comply with Allegion investigations, and let the Legal Department handle legal matters.
- Use social media responsibly, and always think before you post.
- Employees asked to contribute stories/articles for professional organizations/networks that reference Allegion must have prior approval from the Communications Department.



## Stop & Think

**A reporter contacted me over social media asking for basic information about Allegion, our business results and how recent events in the news affect our industry. Can I respond?**

No. Even simple questions should be routed to Corporate Communications because you may not have all the relevant facts. Even accurate information released at the wrong time could lead to problems.

**I found an unfair negative review of one of our products online. Can I respond?**

No. If you encounter a negative online comment about an Allegion product, do not respond. Instead, report it to Corporate Communications. Comments you make online – even with good intentions – are permanent. Never speak on behalf of Allegion unless authorized.



## Maintaining honest and accurate records

■ Allegion is committed to providing full, fair, truthful and timely disclosure in our regulatory filings and in our public communications. Every employee must do his or her part to maintain an atmosphere of honesty, accuracy and integrity.

We have an obligation to maintain books and records according to strict standards. Records consist of all forms of information created or received by Allegion, whether originals or copies, regardless of media. Examples of company records include paper documents, email, electronic files stored on hard drive, disk or any other medium (CD, DVD, USB data storage devices, etc.) that contains information about our company or our business activities. Our books and records must be accurate and complete in every respect and must not contain false or misleading information. If you prepare public financial disclosures, ensure the information is complete and timely.

Maintain business records with integrity. Failure to do so can lead to financial and accounting violations and legal exposure.

Follow our records retention schedule for retaining and destroying documents. If we need to suspend this schedule because of an investigation or audit, you will be notified of the “legal hold.” Contact your manager or the Legal Department if you have questions.





If you are a senior financial manager, ensure your staff has the appropriate expertise and resources to do their job. Avoid pressuring company personnel to influence or meet financial targets. Above all, ensure reports and documents are accurate.



## Key Point

- **Be honest**
  - Ensure books and records are accurate and complete.
  - Never record or provide false or misleading information.
- **Be responsible**
  - Know and follow our document retention policies.
  - Adhere to legal hold notices.



## Stop & Think

I noticed some entries in accounting paperwork that don't look right to me. My manager has asked me to destroy the documents according to our retention policy, but I don't think I should. Should I listen to my manager?

No. If you think there is a problem with a record, let someone know. You may help us avoid a problem. Even if our document retention policy states you can destroy a document, it is likely our company will want to take a look at it in this case. Refrain from destroying it and share your concerns with the Legal Department.



## Unlock Our Policies

For additional information please see the Records Management Policy.



# We follow the law

In protecting people and their property, we are committed to doing it the right way – we are committed to complying with the laws of the countries in which we operate.

Some of  
the places  
we call home

Melbourne  
Australia



# Preventing bribery and corruption

■ Allegion is committed to winning business ethically and legally. We prohibit giving or offering anything of value in exchange for a business advantage. As a global company, we adhere to the requirements of the US Foreign Corrupt Practices Act, the UK Bribery Act and any additional regulations in the countries where we are doing business.

Bribery is exchanging or offering something of value to improperly influence or gain a business advantage. This includes, but is not limited to, the following:

- Cash
- Cash equivalents (such as gift cards)
- Entertainment and travel expenses
- Charitable donations
- Job offers

## Win honestly, or walk away

If you cannot win a contract without paying a bribe – either directly or indirectly through a third party – then report the matter to your manager and the Chief Compliance Officer and walk away from the deal. We prohibit the giving, promising or offering of bribes to anyone, including government or private parties.

Follow our policies on gift-giving and maintain heightened awareness when dealing with government officials.



## Use care with business partners

Never use a third party to do what Allegion cannot do itself. In other words, never allow a contractor, consultant or other third party to pay or offer bribes on Allegion's behalf. If you believe a third party will pay a bribe or act in an illegal or unethical way, share your concerns.

As required by our business partner vetting policies, conduct necessary due diligence on third-party business partners prior to contracting with them. If a third party requests commissions in cash, posts unexplained large expenses on an expense report, says he or she is working directly with a government official to get Allegion a contract, or has fraud in their background, it's a warning sign.



## Avoid facilitation payments and keep accurate records

Allegion does not permit facilitation payments – small payments for routine government action. It is vital you keep accurate books and records that honestly describe a payment's purpose.



## Stop & Think

**A local school near one of our offices has asked for donations to improve their building. However, I found out a member of the school board is on the government procurement team for a project on which Allegion is bidding. Can I recommend we make the donation?**

No. While these types of donations may be permitted in other circumstances, there is a problem. Since the board member is also a decision maker on the bid, this could be viewed as an attempt to improperly influence the official. You must avoid even the appearance of wrongdoing in this case.

**A port official in a foreign country has asked for a small payment of US\$25 to “assist products through customs.” I don’t think this is a standard fee. Should I pay?**

No. If you are ever asked for a facilitation payment – or any other payment you think may be an inappropriate request for a bribe – stop what you’re doing and contact your manager or the Chief Compliance Officer.



## Unlock Our Policies

For additional information please see the Business Partner Vetting Policy and the Anti-Bribery and Anti-Corruption Policy.

# Working with government

■ Laws regulating doing business with governments and government representatives are strict. We must avoid even the appearance of impropriety when dealing with government representatives.

We want to conduct honest, transparent business with every customer. The rules on selling to government representatives, entities or agencies can be quite restrictive, and they apply no matter what our role is. It's important to know the requirements that apply to government contracts to ensure that you help us maintain the highest standards.

We're also committed to cooperating with government investigations. If you receive a request from the government, forward it to the Legal Department immediately. When responding to a request related to an investigation, be sure to provide complete and accurate information. Remember that we never tolerate retaliation against any employee for cooperating with a government investigation.

## Always:

- Follow laws governing the procurement process.
- Avoid providing anything of value to a government representative.
- Comply with contract specifications.
- Keep accurate records, including cost and pricing data.
- Prevent disclosure of classified material.
- Comply with restrictions on employment of former government employees.



## Key Point

When dealing with the government:

- Seek guidance.
- Be accurate.
- Comply with the law.



## Stop & Think

**A government contract requires us to perform a safety inspection more than once. I feel it's a waste of time and resources. Should I skip the inspection to save time and money?**

No. Always adhere to the terms of a government contract. Perform the requested services and keep a detailed log of time and work performed.



## Do the Right Thing



# Avoiding insider trading

■ Because Allegion is a publicly traded company, employees and their families cannot trade or recommend trading our securities (including shares, options or bonds) when they possess “material non-public information.”

Material non-public information is information not available to the general public that a reasonable investor would consider important in making an investment decision. This includes information on earnings, potential business deals, changes in executive leadership or changes in the company’s capital structure.

Trading on such information or recommending others act on such information (“tipping”) violates insider trading laws and can have serious consequences.

Special rules apply for directors and executive officers. Make sure you know our policies.



**Do not trade on material inside information.**



## Key Point

### • Be safe

- Don't profit in any way from non-public information.
- Don't share material inside information with customers, competitors, relatives or friends.

### • Be smart

- Don't suggest others trade Allegion securities when you have material non-public information.
- Only discuss material non-public information with co-workers who need to know for legitimate business purposes.



## Stop & Think

**My brother asked how things are going at work. I shared some news about an upcoming acquisition. I told him it was confidential and not to say anything. Is this permitted?**

No. Sharing material non-public information, such as information on a potential acquisition, could be considered “tipping.” If your brother trades on the information, you could both be in violation of insider trading laws.



## Unlock Our Policies

For additional information please see the Insider Trading Policy.

# Complying with global trade laws

■ Most countries regulate trade, such as imports and exports. Allegion's policy is to comply fully with international trade controls.

Trade laws vary across the globe. Allegion follows all applicable laws and does not cooperate with boycott requests or other restrictive trade practices. Failure to follow the law could harm our business or result in the loss of export privileges.

When conducting international trade:

- Follow all applicable import and export control laws.
- Know the regulations in countries where we do business.
- Know your trading partners (customers, suppliers, etc.) and avoid dealing with entities or individuals prohibited under government restricted persons lists.
- Avoid dealing directly or indirectly with countries subject to sanctions.



**Export:** An item sent from one country to a foreign destination. This can also include data transmitted via email or fax. Some information can be considered exported to a foreign national, even if it never leaves the country. For example, an export includes showing a foreign national software code on a computer in an office in the U.S.



## Stop & Think

**My customer has requested for a Free Trade Agreement (FTA) Certificate of Origin for product we will sell to them. Can we provide this certificate?**

It depends. An FTA certificate may only be provided when all legal requirements are met. Qualification for FTAs requires technical knowledge and application of strict "rules of origin," as well as collection of extensive supporting documentation (such as FTA certifications from suppliers for purchased parts).

**We received a purchase order from a company based in a country that may be subject to trade sanctions. Can we accept their order?**

It depends. Trade sanctions rules change continuously. To ensure compliance with the latest rules, we must conduct screening of the proposed transaction using the Amber Road software to ensure we do not transact with restricted parties or countries subject to a trade embargo. While most countries are not subject to comprehensive trade embargoes, specific individuals, businesses and/or industries may be subject to sanctions.



## Unlock Our Policies

For additional information please see the End-User Screening Policy and Procedure for Export Compliance and the Trade Sanctions and Embargoed Countries Policy, or contact the Director of Global Trade Compliance.



# Guarding against money laundering

■ Allegion takes all reasonable steps to prevent our goods and services from being used for illegal purposes. If you're concerned about the source of customer funds, err on the side of caution and report it.

Money laundering means moving the proceeds of crimes to hide their origin, or transferring legitimate funds for criminal purposes, including terrorism. Know who is behind transactions, and make sure that you only conduct business with reputable third parties.



## Key Point

- **Know it:** Be familiar with money laundering laws. File reports for transactions in the U.S. involving \$10,000 or more in cash or cash equivalents.
- **Watch it:** Be aware of warning signs, including attempts to pay invoices in cash, requests to ship products other than to the place of payment or suspicious fund transfers.
- **Report it:** If you're concerned about the source of customer funds, report it to your manager, the Ethics HelpLine, a member of the Legal Department or the Chief Compliance Officer.



## Stop & Think

**A new customer asked me to set up a payment arrangement that involves a third party. It's an unusual request, but I want to be responsive to the customer. What should I do?**

Customer service is important, but you need to report suspicious requests or transactions to the Legal Department or the Ethics HelpLine. International money brokers often "launder" money obtained illegally by buying goods from legitimate companies and their distributors. They may pay for them in suspicious ways. Seek help if you're ever unsure.



## Want to know more?

Please contact the Legal Department.

# Competing fairly

■ Allegion does not support illegal activities that restrain trade or constitute unfair business practices. We're also committed to marketing our products with honesty and integrity. We do not want to gain an advantage in the market through deceptive practices.

## Use caution with competitors

Competition and antitrust laws are complex and have severe penalties. Know the competition laws in the countries where we do business.

Never enter agreements (verbal or written) to:

- Fix or agree to fix prices or other benefits, terms or conditions of sale for competing products or services.
- Divide or allocate customers, bids, markets or territories for competing products or services.
- Refuse to sell to particular buyers or to buy from particular suppliers.
- Exchange or receive non-public sales or price information.



Even casual conversations can potentially violate the law. Use caution when talking to competitors. Never discuss sensitive information or enter into improper agreements with competitors.



## Key Point

### • Be cautious

- Do not discuss prices or other benefits, terms or territories with competitors.
- Avoid even the appearance of impropriety.

### • Be smart

- If sensitive conversations with competitors arise, such as at a trade show, end the conversation immediately.
- If others are present for the conversation, leave in an obvious way and let the group know you will not participate in the discussion.
- Do not mandate that customers provide competitor information in order to quote or sell Allegion products.
- Do not accept physical or electronic receipt of competitor information marked as confidential or proprietary information of the competitor.

### • Be proactive

- Know and understand our policies.
- Report actual or suspected violations to your manager, the Ethics HelpLine or the Legal Department.



## Fair competition means marketing with integrity

All marketing, sales, advertising and promotional activities must be truthful. Never make false or misleading claims about our products and do not disparage competitors. When Allegion says our products meet the highest standards, we mean it. That includes complying with all governmental and company quality standards.

Keep your interactions with customers professional and honest and treat customer property with care. Customer billing should always be accurate.



## Stop & Think

A sales representative from a competitor, whom I know socially, asked me at a conference to refrain from bidding on an upcoming project so he could achieve his quarterly sales quota. He said that in exchange, he would “return the favor” next quarter. I told him I’d think about it. I didn’t submit a bid. Did I violate our policies?

Yes. Even if your non-bid was for other reasons, you’ve created the appearance of impropriety. The failure to report the competitor’s initial request, coupled with your non-bid, may even be enough to create legal liability. You should have ended the conversation in an obvious way and reported it.

I know a competitor is having quality-control issues with a competing product. It’s not public knowledge, but I found out through a friend who used to work there. I told a potential client about it, and he did not hesitate to give us his business. That was a good use of competitive intelligence, right?

Wrong. Allegion is committed to winning business in an honest, ethical way. Disparaging competing products is never a way to win business. Instead, sell our products by highlighting our brands’ quality, value and commitment to customer service.



## Unlock Our Policies

For additional information please see the Antitrust Policy.



# We respect the world around us

We are good neighbors and good corporate citizens – with more than 10,000 channel partners and operations in more than 130 countries, we recognize the obligation we have to set a good example.

Some of  
the places  
we call home

Mississauga  
Canada



## Upholding human rights

■ Allegion is committed to upholding fundamental human rights and believes that all human beings around the world should be treated with dignity, fairness, and respect. Allegion does not use or condone the use of slave labor or human trafficking and denounces any degrading treatment of individuals or unsafe working condition. We are also committed to fair labor practices and following all applicable wage and hour laws and regulations.

If you hear about or suspect unfair labor practices, forced labor, child labor or human trafficking at Allegion or in our supply chain, you have an obligation to report the situation to your manager, the [Ethics HelpLine](#) or another internal resource.

Allegion publishes an annual statement describing our efforts to uphold human rights and encourages transparency and integrity in our supply chain. Our business partners must adhere to our Business Partner Code of Conduct, which strictly prohibits human trafficking, child and forced labor, and we require our suppliers and direct contractors to demonstrate a serious commitment to the health and safety of their

workers and operate in compliance with human rights laws. In addition, Allegion follows all applicable conflict mineral laws and promotes sourcing of conflict-free minerals and expects the same from our supply chain partners. Allegion holds our business partners accountable for their business practices and will only work with partners committed to the same standards of respect and dignity for all people.





## Key Point

- Always report suspicions of forced labor, child labor or human trafficking.
- Perform due diligence on business partners according to Allegion policies and ensure their values align with Allegion's commitment.



## Stop & Think

**I want to engage a manufacturer who came recommended by a co-worker. During the vetting process, I discovered the company had a history of supporting child labor to save money. It was a few years ago, and my co-worker tells me it's "not an issue" anymore. It's not a problem, right?**

Wrong. Even if a third party comes recommended and their misdeeds are in the past, it's important to flag the abuses. Before signing with the manufacturer, seek guidance. Working with companies that have a history of human rights violations puts people and our reputation at risk.



## Unlock Our Policies

[Anti-Human Trafficking Statement](#)

[Conflict Minerals Policy](#)

[Business Partner Code of Conduct](#)

[Global Human Rights Policy](#)



# Committing to the environment

■ Allegion is committed to conducting business in an environmentally responsible manner and strives to improve our performance to benefit our employees, customers, communities, shareholders and the environment.

To do so:

- We use energy wisely and efficiently and employ technology to minimize risk of environmental impact.
- We comply with the environmental laws that apply to us.
- We educate employees whose work affects environmental compliance with permits, laws, and regulations that apply to their work.
- We educate and engage our employees and inform external stakeholders in our environmental efforts.
- We contribute to and partner with organizations that work towards environmental goals.
- We engage our supply chain in supporting our sustainability efforts.
- We work with suppliers with demonstrable environmental commitments, to the extent we can.



## Stop & Think

**I'm working on a project that may have environmental implications and could affect the surrounding community. The law permits our current course of action, but I think Allegion's policies may differ. What do I do?**

If you feel an Allegion initiative will place the environment or the local community at risk, but the law permits the action, then ask before acting. If the law and our policies conflict, you must follow the more stringent standard. Always seek guidance if you're ever unsure.

# Supporting our communities

■ Allegion is a community partner and good corporate citizen.

We are committed to improving and supporting our local communities around the globe. Our local sites are encouraged to identify local needs, form local giving and volunteer committees, and make a difference where they live, learn and work.

However, it's important that these activities do not create a conflict with Allegion. Please use our giving pillars as a focus area and follow corporate and local policies and guidelines on donations, sponsorships and service projects. And remember: Seek prior approval from your manager before you use company time or resources to further your community work.



## Key Point

- **Be involved:** Get into the community and make a difference.
- **Be responsible:** Avoid conflicts of interest.
- **Be respectful:** Do not use company time or resources without permission.



## Stop & Think

**My friend is starting a charity and she wants to print some flyers for a fundraising event. It's only 100 color copies. Can I use the printer in my office to do it for her?**

Although Allegion is committed to community involvement, this action would use company resources and could create a conflict of interest. It's best to do such activities on your own time and with your own resources.



Check with your local office to determine where there may be opportunities to give back to the community.



# Getting politically involved

■ Political involvement is a way people can positively impact the communities where they live, and Allegion respects your right to participate. However, it is important to be responsible and respectful of our company.

Your political involvement is your own and should not be done on the company's behalf in your capacity as an Allegion employee. Keep the following requirements in mind.

In your capacity as an Allegion employee:

- Do not make political contributions on behalf of the company or contact a government official for that purpose, unless authorized.
- Do not use company time or property for political activities.
- Avoid influencing, on behalf of Allegion, another employee's political contribution or voting decisions.
- Consult the Legal Department or the Chief Compliance Officer before serving as a government official or running for office.

## Rules for lobbying

Allegion may occasionally enter policy debates through discussions through lobbying or other government outreach. If you wish to contact government officials or engage in efforts to influence legislative or administrative action on the company's behalf, first consult with the Legal Department, Corporate Communications or the Chief Compliance Officer.



## Key Point

- Know your rights: You can participate in political activities on your own time.
- Know your limits: Do not involve Allegion in your political efforts.
- Know whom to contact: Seek guidance before lobbying.



## Stop & Think

**A local official is backing a proposed law that I feel could hurt Allegion's interests. I am planning on writing a letter on Allegion letterhead opposing the law. What should I know before I send it?**

Don't send it on Allegion letterhead or leverage your Allegion title and role as part of the letter. Although you are free to participate in political efforts on your own time, you should not speak or lobby on behalf of Allegion unless you're authorized to do so. Using the letterhead or signing with your Allegion title or role may imply you are writing on behalf of the company.



## Want to know more?

Contact the Legal Department or the **Chief Compliance Officer**.

# Resources

■ Know where to go for guidance on our values.

If you need advice or wish to raise a concern, start with your manager. He or she is in the best position to understand and take appropriate action.

If you are uncomfortable speaking with your manager, or if you have raised an issue with your manager and feel it is not being resolved, speak to local management or one of the following resources.

Resource	Contact Information
<b>Human Resources</b>	Contact your local Human Resources Business Partner
<b>The Legal Department</b>	Contact your Regional General Counsel
<b>The Chief Compliance Officer</b>	EthicsandCompliance@allegion.com Employees may also communicate concerns (anonymously or otherwise) in writing to: Chief Compliance Officer Allegion plc 11819 N. Pennsylvania Street Carmel, Indiana 46032 United States of America
<b>The Ethics HelpLine</b> (see <a href="#">Special note for employees located in the European Union</a> )	<b>In the U.S. and Canada:</b> Call toll-free: 800-461-9330 <b>You may also report online:</b> <a href="#">Ethics Helpline</a>
<b>Chief Privacy Officer</b>	DataPrivacy@allegion.com
<b>Corporate Communications</b>	AllegionCommunications@allegion.com



## Special Note for Employees Located in the European Union

Local law limits the use of our Ethics HelpLine by employees in the European Union. References to the HelpLine in the Code and related documents and communications are subject to the restrictions in this section.

If you are located in the European Union, you may contact our Ethics HelpLine 24 hours a day, seven days a week, if you want a confidential way to get advice on or to report a situation involving financial or control matters. These include questionable accounting or auditing matters or other legal matters in the financial, accounting, banking or anti-bribery areas.

Local law may restrict the company from accepting your Ethics HelpLine call to report a violation involving violations outside the areas of financial or control matters.

While employees in the European Union are not obligated to report Code violations, they are encouraged to do so. You may report potential or apparent violations of the Code, law or policy to the resources outlined in the Code. We encourage you to provide your name when making a report, as it will help our company investigate.

Under European data protection laws, any person in the European Union who is the subject of an Ethics HelpLine report will be entitled to the notification, access and corrective action required under applicable data protection laws. This does not include the right to request information about third parties, such as the identity of the person who made the complaint.



# Policies

■ Know where to go for additional information.

Acceptable Use of Technology Policy

[Anti-Bribery and Anti-Corruption Policy](#)

[Anti-Human Trafficking Statement](#)

Antitrust Policy

[Business Partner Code of Conduct](#)

Business Partner Vetting Policy

[Conflict Minerals Policy](#)

Conflicts of Interest Disclosure Form

Conflicts of Interest Policy

Corporate Communications Media Relations Policy

End-User Screening Policy and Procedure for Export Compliance

Gifts, Meals, Entertainment and Donations Policy

Global Harassment and Discrimination Policy

[Global Human Rights Policy](#)

[Global Supplier Portal](#)

[Global Whistleblower Policy](#)

[Insider Trading Policy](#)

Records Management Policy

Social Media Policy

[Speaking Up Policy](#)

Trade Sanctions and Embargoed Countries Policy

Allegion (NYSE: ALLE) is a global pioneer in seamless access, with leading brands like CISA®, Interflex®, LCN®, Schlage®, SimonsVoss® and Von Duprin®. Focusing on security around the door and adjacent areas, Allegion secures people and assets with a range of solutions for homes, businesses, schools and institutions.

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