



Policy covering Business Ethics, Transparency and Accountability

**SUBJECT/ TITLE: Policy covering Business Ethics, Transparency and Accountability
for Ingersoll Rand (India) Limited (Principle 1 with respect to NGRBC’s principles)**

This page is a record of all revisions of the Procedure or Work Instructions.		For convenience, the nature of the revision is briefly noted, under the remarks column here below. Unless otherwise stated, any revisions revision/s should be implemented effective the date the Board of Directors of IRIL approves this policy.	
REV.	BY	PAGES	REMARKS
00	Pramod Hegde	1	Original Release (reported @
REV.	ISSUED BY	APPROVED BY	APPROVAL DATE
00	Mr. Pramod Hegde	Board of Directors of IRIL	May 25, 2023

Principle 1: Business Ethics, transparency, and Accountability Policy

At Ingersoll Rand India Limited (IRIL), we strive to conduct operations by upholding values of ethics and integrity within and across our value chain. We remain committed towards establishing a work environment that thrives on the values of fairness, transparency, and accountability. Furthermore, we strive to establish robust governance systems and policies in place that enable us to guide our economic, social, and environmental ambitions, in a fair and responsible manner.

Scope

This policy statement is developed to provide guidance in communicating performance (financial and non-financial), decisions, and actions transparently and ethically to our stakeholders. This policy shall be used when designing communications for the stakeholders.

This policy statement is applicable to all the employees and workers at IRIL and the functional units. Furthermore, it is applicable to its business partners or value chain partners. This policy statement shall be used along with Ingersoll Rand's Global Code of Conduct book, Supplier Code of Conduct, Business Partner Code of Conduct, taxation practices, anti-corruption and anti-bribery policies, Gifts Meals Entertainment and Visit (GMEV) Policy, internal procedures on anti-trust and conflict of interest.

Our Policy

1. The Global Code of Conduct of the Company is applicable to all employees (whether permanent, temporary, or on contract, direct or through a contractor, retainer, or full-time consultant), and members of the Board of Directors of the Company ("Personnel"). The Company expects its business partners including suppliers, service providers, agents, and channel partners (distributors and others) to adhere to the principles of the Global Business Partner/Supplier Code of Conduct. All Personnel are responsible for demonstrating integrity and leadership by complying with the provisions of the Global Code of Conduct, policies, and all applicable laws and regulations.
2. As a Company of repute and global standing, IRIL is committed to conducting its business in a responsible manner. The Company provides a secure mechanism for stakeholders to disclose any unethical and improper practices taking place in the Company for appropriate action and reporting.
3. The Company acts as a catalyst to cascade responsible practices across its **value chain**. Any member of the value chain found to be indulging in irresponsible, unfair, and unethical business practices shall be investigated and appropriate action shall be taken.
4. The Company adheres to timely and appropriate disclosure of information that may **impact** stakeholders, maintaining high standards of transparency and accountability. The Company endeavors to achieve an appropriate balance between business and confidentiality.
5. The Company **competes** in an **ethical and legitimate manner** and prohibits all actions that are anti-competitive or otherwise contrary to applicable competition or anti-trust laws.
6. The Company's Global Code of Conduct guides all personnel to avoid situations of **conflict of interest** during their daily activities.
7. The Company abides by all applicable **anti-bribery laws**, including the US Foreign Corrupt Practices Act (FCPA) and applicable local laws in every Country of business. The Company prohibits money laundering or financing for illegal or illegitimate purposes. Employees of the Company or their family members shall not accept gifts from the current or prospective contractor, supplier, customer, or any other person with whom the Company does or may do business with (Third-party). There is an annual sign-off on the Company's Global Code of Conduct which includes clauses on anti-bribery and corruption.
8. Develop competency amongst employees, and stakeholders by training and capacity-building actions and take prompt and fair action in case of violation of this policy.
9. The Company's financial reports indicate transparency and accountability, ensuring **timely and complete payment of all applicable taxes** levied by appropriate statutory bodies.

Communication of the Policy

This policy is made publicly available on our website. Hard copies of the policy are made available at all our operating units.