

# Copeland Code of Conduct



# Table of Contents

## Introduction

Message from Leadership.....	3
Purpose and Scope.....	4
Core Values and Principles .....	4
Conflicts of Interest.....	6
Gifts and Business Entertainment.....	8

## Responsible Business ..... 10

Adherence to Local and International Laws.....	11
Anti-Bribery and Corruption.....	13
Fair Competition, Fair Dealing.....	15
International Trade Compliance.....	17
Immigration Compliance.....	19
Insider Trading Laws .....	20
Human Rights.....	21
Child and Forced Labor.....	22
Modern Slavery, Human Trafficking.....	22
Conflict Minerals .....	23
Supplier Code of Conduct .....	24
Accurate Books and Records .....	25
• Sarbanes-Oxley Compliance.....	25
• Tax Compliance(Tax Evasion) .....	25
• Financial Records and Expense Reports..	26
• Management of Corporate Records .....	26
Data Privacy and Confidentiality.....	27
Intellectual Property and Use of Company Assets and Business Systems.....	28
Cybersecurity and Acceptable Use of Artificial Intelligence (AI) .....	30

## Our People ..... 31

Inclusion and Belonging .....	32
Prevention of Harassment and Bullying.....	33
Workplace Safety, Health and Well-Being.....	33
Community Engagement: Political and Charitable Contributions .....	35
Speaking on Behalf of Copeland.....	36

## Environmental Performance/ Sustainability ..... 38

Sustainability Initiatives .....	39
Environmental Protection .....	40
• Undertaking Initiatives to Promote Greater Environmental Responsibility.....	40
• Environmental Principles.....	41

## Reporting and Accountability/ Code Administration ..... 42

Ethics Hotline & Whistleblower Protection.....	43
• Reporting Violations (Illegal or Unethical Behavior) .....	44
• Non-Retaliation .....	44
Code Administration.....	45
Waivers of the Code.....	45

## Conclusion ..... 46



# Code of Conduct Introduction

## Message from Leadership

At Copeland, acting responsibly, with utmost integrity and ethics, is integral to our core values. A high standard for integrity and ethics are foundational to how we must conduct ourselves, how we must base our decisions, and how we must interact with our colleagues, business partners, and with the communities in which we operate and serve. Acting with high ethical standards is a Copeland requirement. It is a shared responsibility that helps define our identity as a global industry leader.



The Copeland Code of Conduct underscores our absolute and non-negotiable commitment to operating responsibly, transparently and ethically in all situations and on all occasions. Whether you are a Copeland colleague, contractor, stakeholder or one of our many business partners, this Code of Conduct must guide your behavior and actions as each of us plays a vital role in protecting Copeland's reputation. A reputation which has been established over decades. By adhering to our Code of Conduct, we ensure that we achieve our strategic vision, while positively impacting the world around us and ensuring the success of our company.

Adherence to the Copeland Code of Conduct is not just about following rules; it is about taking intentional actions, with an ownership mindset, that reinforce the Copeland Values and drive our collective success.

Your personal commitment to the Copeland Values, including taking Responsibility to act ethically and with integrity, is what will continue to make Copeland a world-class company. Working together, we will continue to benefit from a culture where trust, integrity and excellence are integral with our success.

**Ross B. Shuster**  
Chief Executive Officer



## ***Purpose and Scope***

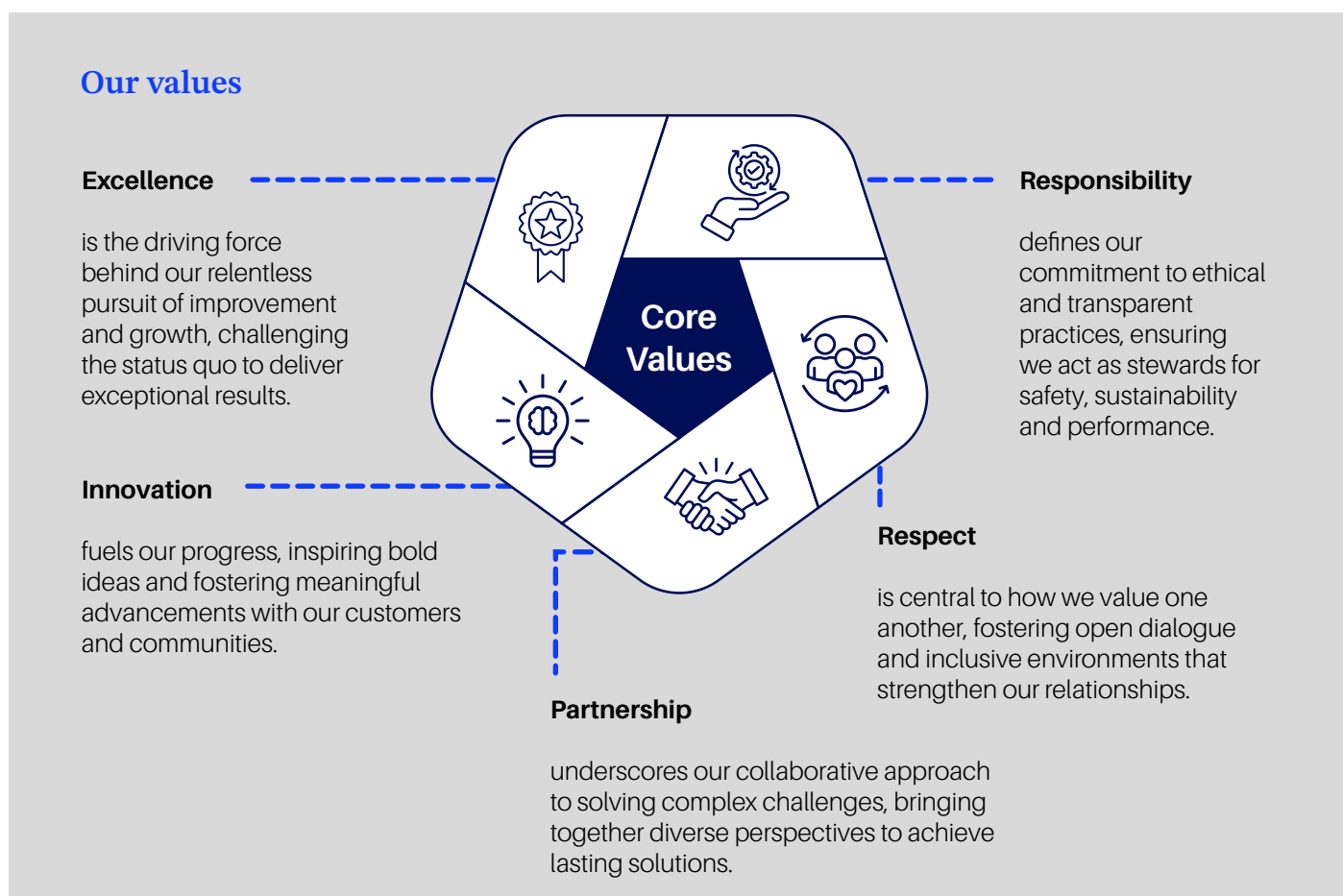
The Code of Conduct is more than a guidebook; it represents our collective values and commitment to acting with integrity. It sets clear expectations for the behaviors, decisions and practices that reflect ethical excellence in everything we do at Copeland.

This Code applies to all colleagues, contractors, stakeholders and business partners across every region where we operate. By adhering to its principles, we contribute to a culture built on trust, fairness and responsibility. It ensures our operations remain aligned with the highest standards of ethics, from shaping boardroom strategies to fostering partnerships across global markets.

By aligning with this framework, every individual and team at Copeland helps uphold our dedication to ethical business practices. Together, we create a foundation where innovation thrives, relationships strengthen and our actions continuously mirror our commitment to doing what is right.

## ***Core Values and Principles***

Our organization thrives on a set of core values that define who we are and how we operate.



These values are at the heart of this Code, guiding every decision and interaction as we shape a brighter, more sustainable future together.



## Copeland Business System Core Operating Principle

We are dedicated to fostering consistency, accountability and effective engagement across all levels of our operations.

The **Copeland Business System (CBS)** aligns our organization with a global, enterprise-wide framework of structured processes and tools. It defines the way in which we manage our business ethically and responsibly.

**CBS** underpins who we are and how we work: from culture and mindset to the processes and tools that enable a center-led, interdependent and aligned organization.





## ***Conflicts of Interest***

At Copeland, trust and integrity are the foundation of everything we do. To uphold this standard, we must recognize and address conflicts of interest that could compromise decision-making and impact our operations.

### **What Is a Conflict of Interest?**

A conflict of interest arises when an individual's personal interests, financial or otherwise, interfere with their responsibility to act in Copeland's best interests. Identifying and addressing these situations proactively ensures ethical practices and safeguards our collective goals.

#### ***Common Examples of Conflicts of Interest:***

##### **Personal Financial Gain**

If a colleague awards a vendor contract to a company owned by a family member without disclosure and necessary approval, it creates a conflict. Transparency in such choices is crucial.

##### **Competing Interests**

A colleague who works at Copeland but also consults for a competitor risks compromising their ability to make objective decisions.

##### **Outside Activities**

If a director invests in a startup developing products similar to Copeland's, it could influence corporate strategies unfairly.

### **Guidelines to Maintain Ethical Standards:**

To protect Copeland's reputation and ensure informed decision-making, all colleagues, officers, directors and business partners must:

- **Promptly disclose** any potential conflicts to leadership or the Compliance Department, as outlined in our policies or by emailing [ethics@copeland.com](mailto:ethics@copeland.com).
- **Avoid pursuing personal gain** using Copeland's property, information or position.
- **Refrain from using Copeland's assets** or proprietary information for personal benefits.
- **Avoid competing** directly or indirectly with Copeland's interests.
- **Actively promote Copeland's legitimate interests** whenever opportunities arise.



## Examples



**Acceptable Behavior:** Alex, an engineer at Copeland, was invited to speak at a major HVACR industry conference.

Excited about the opportunity, he collaborated closely with his marketing team to prepare a presentation. He made sure to highlight Copeland's innovation goals and industry insights—without revealing any confidential project details. At the event, his talk was a hit. Alex represented Copeland with integrity and professionalism.



**Unacceptable Behavior:** Janet, a Copeland project manager, was tasked with selecting a supplier for a major new initiative. One of the candidates happened to be her cousin's company—well-qualified, but the relationship was never disclosed. Instead of reporting the conflict of interest or recusing herself from the decision, Janet awarded the contract to her cousin without transparency. This not only violated Copeland's policies but also risked damaging the fairness and integrity of the procurement process. Decisions like this can undermine trust with colleagues, business partners and stakeholders.



By following these principles, we not only protect our operations but also honor the trust placed in us by colleagues, partners and communities.

## Why Vigilance Is Essential:

Conflicts of interest can damage team morale, risk legal consequences and harm Copeland's global reputation. Staying proactive and transparent ensures we maintain our leadership in the industry while embodying our commitment to integrity and ethical practices.

Together, we can continue to innovate and lead with trust, ensuring that we operate with clarity and fairness across all regions where we make an impact.

*For further guidance, reach out to the Legal and Compliance Department at [ethics@copeland.com](mailto:ethics@copeland.com).*

## Gifts and Business Entertainment

At Copeland, integrity is the foundation of our business relationships. To uphold this commitment, all gift exchanges and business entertainment must align with ethical standards and anti-corruption policies, ensuring transparency and fairness in every interaction.

A conflict of interest arises when an individual's personal interests, financial or otherwise, interfere with their responsibility to act in Copeland's best interests. Identifying and addressing these situations proactively ensures ethical practices and safeguards our collective goals.

## Gift Guidelines

**Permitted Gifts:** Acceptable gifts are of nominal value, are transparent and serve a legitimate relationship-building purpose. Transparency means that the exchange of gifts should be open and honest, with no attempt to conceal the activity. For example, transparency can include documenting the gift, obtaining approval from a supervisor or ensuring the exchange aligns with company policies. Items such as branded merchandise like mugs or small tokens of appreciation appropriately meet these criteria. Gifts should never be given or received in a manner that could be perceived as secretive or intended to influence decision-making improperly.

**Prohibited Gifts:** Lavish or expensive gifts, such as cash, luxury items or extravagant gestures, are strictly prohibited as they can create conflicts of interest or imply undue influence.





## Business Amenities Requirements

Engaging in business entertainment should focus on **professionalism** and align directly with **Copeland's business interests**. The following principles must be adhered to:

The activity remains business-focused and professional at all times.

It must not influence or create the perception of influencing decision-making inappropriately.

All participants, including colleagues and business partners, must comply with Copeland's anti-corruption policies and any applicable local laws.

## Why These Standards Matter

By adhering to these principles, we reinforce Copeland's commitment to **integrity, transparency and responsibility**. These guidelines are not just policies; they're a reflection of Our Values and the trust we build with colleagues, contractors, stakeholders and partners worldwide.

Every interaction at Copeland should reflect our dedication to fairness and mutual respect, ensuring every relationship is built on strong ethical foundations.

### Examples

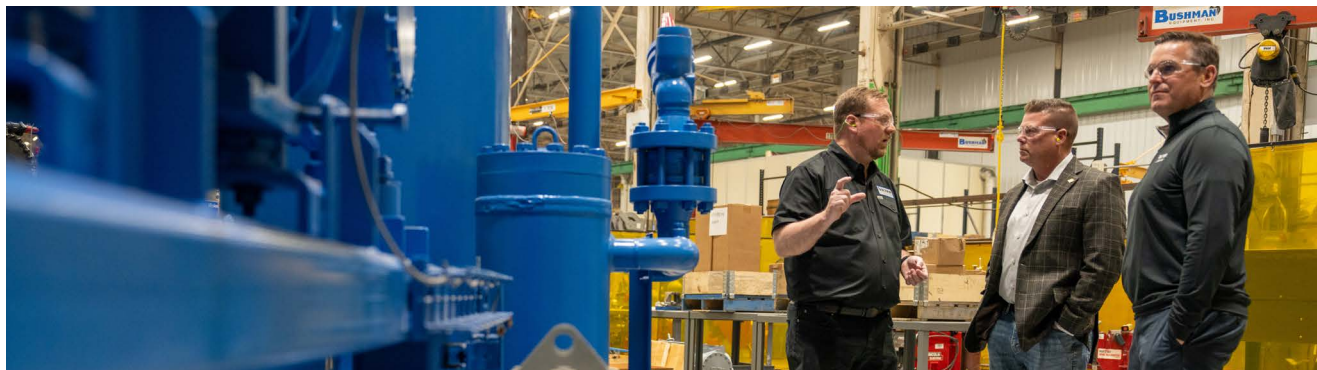


**Acceptable Behavior:** Janet, a Copeland project manager, met a longtime business partner for a routine project update over lunch. The restaurant was modest and local, and the cost fell well within Copeland's standard business meal thresholds. After the meeting, Janet promptly recorded the lunch in Copeland's Expense Management tool, ensuring full transparency and compliance with the company's Gifts & Entertainment good practices. By keeping the interaction reasonable, documented, and aligned with policy, Janet demonstrated how everyday hospitality can be handled professionally and ethically.



**Unacceptable Behavior:** Alex, a Copeland sales lead, decided to gift a potential customer an expensive bottle of wine as a gesture of appreciation. However, Alex did not consult and apply the Copeland Business Amenities Procedure for Third Parties and Foreign Officials applicable to Gifts, document the exchange or follow the applicable approval process. While Alex believed the gesture would help strengthen the relationship, the lack of transparency around the gift violated Copeland's Gifts Procedure. Acceptable gifts must always be openly documented, approved when required and aligned with company guidelines, ensuring there is no perception of impropriety. The lesson? Transparency is critical for maintaining ethical standards. Always ensure gifts are properly disclosed, align with approved guidelines and contribute to building legitimate business relationships.

*For further guidance or to address any uncertainties, please refer to the **Anti-Corruption and Gift Policy** or consult with the Legal and Compliance Department.*





## *Responsible Business*

### Compliance with Laws and Regulations

At Copeland, our commitment to operating as a responsible business begins with strict compliance with all applicable laws and regulations. We uphold the highest standards of **ethical behavior, integrity and transparency** in every aspect of our operations.

- All colleagues and business partners must adhere to local, national and international laws that govern our industry.
- Compliance is essential to protecting our reputation, ensuring fair business practices and achieving long-term success.
- This section outlines key areas where compliance is critical to maintaining trust, accountability and sustainability.

### Why Compliance Matters to All of Us

Following these principles reinforces Copeland's immutable dedication to ethical business practices. More importantly, it creates a culture founded on integrity and responsibility.

Whether we're driving sustainable heating solutions in Europe, ensuring fair governance in the Middle East or reducing food waste in Asia, compliance is non-negotiable.

Together, we ensure that Copeland not only meets legal and industry standards but leads the way in promoting accountability, ethical leadership and a shared commitment to a sustainable future.



## Adherence to Local and International Laws

### Overview of Relevant Laws and Regulations

At Copeland, we operate in a **global marketplace**, which means adhering to **local, national and international laws** is not just a requirement but a reflection of our **commitment to ethical and responsible business practices**. Compliance is the foundation of our operations and ensures we maintain the **trust of our colleagues, contractors, stakeholders and business partners**, regardless of where they are in the world.

Our compliance is built around several key areas, each critical to maintaining **integrity** and **excellence**:

**Labor Regulations:** We emphasize the fair treatment of colleagues, promote workplace safety and uphold their rights. For example, in regions like North America, we implement regular safety audits and training programs to ensure compliance with labor laws and workplace standards.

**Environmental Standards:** At Copeland, sustainability is a core pillar of Our Values. We are committed to reducing environmental impact and promoting sustainable practices. Whether it is adhering to stringent EU environmental directives or championing green technologies in urban infrastructure, our operations reflect our global commitment to the environment.

**Trade Laws:** Navigating the complex world of import, export and international trade regulations is a necessity. For example, our teams closely coordinate with regulatory bodies in regions like Asia-Pacific to ensure seamless cross-border partnerships while staying fully compliant with trade laws.

**Anti-Corruption Measures:** Our zero-tolerance policy on bribery, fraud and unethical business conduct is fundamental to our operations. Through internal auditing systems, mandatory compliance training and whistleblower programs, we actively prevent misconduct and ensure our integrity as a global leader.

**Data Protection Requirements:** With the increasing importance of data security, we are committed to safeguarding personal and corporate information. For instance, in compliance with frameworks like GDPR in Europe, we implement advanced data encryption methods and conduct regular privacy risk assessments to maintain the trust of our stakeholders.

*If a Copeland colleague or Business Partner believes that **any requirement under local law** might **prevent them from complying with the Code of Conduct**, then the colleague or Business Partner should consult with the **Legal and Compliance Department** for guidance on resolving that conflict.*







## Colleague and Business Partner Responsibilities

To ensure alignment with our ethical and legal standards, we require everyone to:

- **Stay informed** about the relevant laws and regulations tied to your role. For instance, if you work in procurement, understanding local trade laws is crucial.
- **Seek guidance** when uncertainty arises. Consult your managers or the **Legal and Compliance Department** whenever clarification is needed. Proactively addressing ambiguity helps maintain clarity and integrity.

### Example

Janet was leading the negotiation of a new contract with a vendor based in a country known for strict and complex regulatory requirements. She looped in Alex from the Legal and Compliance Department early in the process. “Can you double-check this clause?” she asked, pointing to a section on local licensing. Alex nodded. “Good call—this could cause issues if it is not worded precisely. Let’s align it with both local law and Copeland’s standards.” Together, they carefully reviewed each section, making sure the contract met all legal and ethical obligations. Janet and Alex not only protected the company from potential fines and delays—they also reinforced Copeland’s reputation for doing business the right way.

**Take a proactive approach** by identifying and addressing potential risks before they become issues. For example, if a regional supplier presents concerns around labor standards, bring this to attention immediately.

## Anti-Bribery and Corruption

### Prohibition of Bribery and Corruption

At Copeland, we uphold a **zero-tolerance policy toward bribery and corruption** in all its forms. Integrity is the foundation of our operations, and we take every measure to maintain ethical business practices across the globe.

All colleagues, officers and business partners acting on behalf of Copeland must never:

- **Promise, offer, give, solicit or accept anything of value** to improperly influence a business decision or gain an unfair advantage.
- Engage in **bribery or corrupt practices** when dealing with government officials, commercial partners or third parties.
- Make **facilitation payments** unless an individual's health or safety is at risk. Should such payments be unavoidable, they must be reported and documented promptly.
- **Destroy, remove, alter or modify in any way documents or accounting records** in an effort to conceal or disguise a bribe or improper gratuity.

### Example

Alex was overseeing a Copeland installation project tied to a government contract abroad. Things were going smoothly—until a local intermediary hinted that a “small payment” could help move the approval paperwork along faster. “It is just how things work here,” the intermediary said with a shrug. But Alex did not hesitate. He knew that Copeland strictly prohibits facilitation payments, no matter how minor they seem. “We do not operate that way,” he replied firmly. Instead, he documented the request and reported it to Compliance. Alex not only protected the project's integrity—he also upheld Copeland's global reputation for transparency and fairness.



## Reporting and Compliance Measures

To safeguard Copeland's integrity, it's critical that all our colleagues and partners actively contribute to a culture of transparency and accountability.

Here's how we ensure compliance and take action against unethical practices:

- Report any suspicions of bribery or corruption immediately. You can do this through the Legal and Compliance Department or anonymously via the Global Ethics Hotline.
- All allegations will be thoroughly investigated, and proven violations will result in strict disciplinary measures, up to and including termination of employment or partnerships.

### Example

While reviewing monthly reports, Janet noticed something odd—several invoices had been approved without the usual backup documentation. She brought it up to Alex, who handled internal controls. "This doesn't look right. There's no PO or explanation for these approvals." Alex took a closer look and agreed. "Good catch. Let's escalate this to Compliance." The issue was quickly investigated and resolved. It turned out to be a process gap—not fraud—but her action reinforced the message that at Copeland, everyone plays a role in protecting ethical standards.



***Should you have questions about this policy or need guidance on ethical dilemmas, reach out to our Legal and Compliance Department at [ethics@copeland.com](mailto:ethics@copeland.com). Together, let's continue building a business that prioritizes integrity in every decision.***





## ***Fair Competition. Fair Dealing.***

### **Prohibition of Bribery and Corruption**

At Copeland, we are deeply committed to maintaining fair competition, a principle integral to building trust and integrity in every market we serve. We compete purely on the merit of our products and services, ensuring ethical interactions with customers, suppliers and competitors alike. By upholding fair dealing practices, we foster innovation, improve efficiency and enhance customer satisfaction.

#### ***Example***

Alex and Janet were part of the team tasked with selecting a new supplier for a major Copeland project. Several bids came in, and while one vendor was a familiar name from past projects, Janet made it clear from the start: “Let’s evaluate strictly on merit—no shortcuts.” They reviewed each proposal carefully, focusing only on product quality, delivery timelines and overall value. When the final choice was made, it was clear the process had been fair, transparent and free from favoritism. Alex and Janet demonstrated Copeland’s commitment to integrity in every business decision.

## Antitrust Regulations and Practices

All colleagues, contractors and business partners must comply with antitrust and competition laws. These laws prohibit actions such as:

- **Collusion:** Agreements between competitors to limit competition.
- **Price-fixing:** Setting prices with competitors instead of allowing market forces to determine them.
- **Bid rigging:** Manipulating bidding processes to predetermine winners.
- **Abuse of market dominance:** Using a dominant position to unfairly restrict or eliminate competition.

Discussions or agreements with competitors about pricing, market or bid allocation or any activities that could distort competition are strictly forbidden. In addition, we must also be mindful of agreements or practices between suppliers and distributors—known as vertical relationships. These can raise concerns when they involve setting resale prices, restricting territories or customer groups or requiring exclusivity in ways that may unfairly limit competition.

Exercise particular caution during trade shows, industry forums, joint ventures or association meetings, where informal exchanges of competitively sensitive information or even unilateral disclosures, such as future pricing, strategic plans or customers lists —however well-intentioned—can easily cross the line into territory that raises competition concerns.

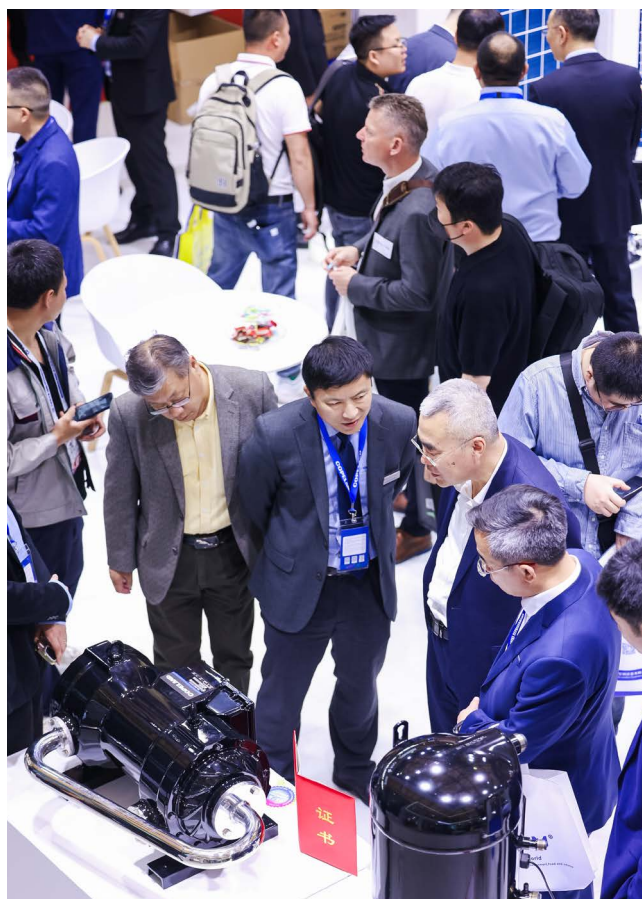
### When in Doubt, Seek Guidance

To ensure compliance and protect Copeland's reputation, any potential antitrust or competition concerns must be addressed immediately especially when considering exclusive arrangements, pricing conditions or distribution terms. Regulations may differ across the countries and regions in which we operate. When in doubt, consult Legal to understand local legal standards alongside our global commitments. In some countries, violations can carry criminal consequences for individuals, making personal accountability vital.

Training and compliance checks are part of our commitment, and we strongly protect those who raise concerns—retaliation against whistleblowers is not tolerated.

### Example

Janet was wrapping up a meeting with a supplier when the conversation took an unexpected turn. "Look," the supplier said casually, "what if we agree not to target each other's regions? You take the north; we take the south—no more stepping on toes." Janet immediately recognized the risk. "I have to stop you there," she replied firmly. "That kind of arrangement would violate antitrust laws, and Copeland does not engage in anything that restricts fair competition." She reported the conversation to the Legal team, ensuring the incident was documented and handled appropriately. Janet helped protect Copeland from legal exposure—and reinforced our commitment to fair and ethical business practices.



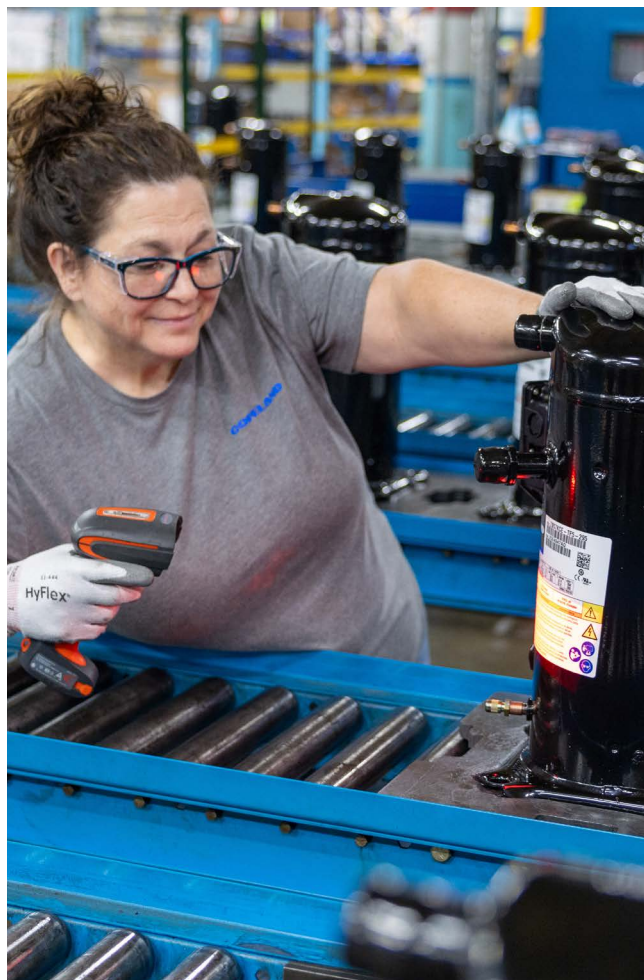
Reach out to the **Legal and Compliance Department** without hesitation. Reporting concerns early ensures we remain aligned with regulatory standards and maintain the highest ethical practices.

## International Trade Compliance

### Export and Import Controls

Compliance with international trade laws and regulations is critical to Copeland's success in global markets. All colleagues, contractors and business partners involved in international trade activities must adhere to the following principles:

- Follow export and import laws specific to each area where we operate.
- Maintain accurate, detailed documentation for every transaction to support transparent and compliant operations.
- Ensure products are correctly classified for customs purposes to avoid delays and penalties.
- Adhere to the operational procedures outlined in Copeland's trade compliance programs.



### Example

Alex was coordinating an urgent shipment of refrigeration components from the U.S. to several customers across Europe. As he reviewed the packing list, he noticed that one of the new parts didn't have a confirmed harmonized system (HS) code assigned yet. Rather than rushing it through, Alex paused the process. He double-checked the product specs and worked with the Trade Compliance team to correctly classify the item and prepare the necessary documentation. His attention to detail paid off—the shipment cleared customs without delay. Alex avoided penalties and helped protect Copeland's reputation for compliance and reliability in global trade.



## Trade Sanctions and Embargoes

Copeland is firmly committed to adhering to all trade sanctions and embargoes imposed by relevant authorities, including the U.S., EU and other international jurisdictions. This commitment applies to colleagues, stakeholders and partners, who must ensure the following:

- Transactions, activities and engagements do not involve restricted parties, prohibited end-uses or countries subject to embargoes.
- All deals are screened against Copeland's regularly updated [Prohibited Regions and Entities List](#) to mitigate risks.

To support compliance, Copeland provides:

- **Training programs** to help stakeholders identify and manage trade compliance risks effectively.
- **Internal tools** for screening transactions and ensuring adherence to global sanctions policies.

### Example

If our team identifies a potential trade opportunity in a region under embargo (e.g., North Korea), Copeland's strict compliance standards will ensure the deal is flagged and halted before any further risks are incurred.





## Immigration Compliance

### Compliance with Immigration Laws

At Copeland, we are fully committed to complying with immigration laws in every country where we operate. Together, we can ensure a lawful and ethical workforce that aligns with regional regulations and strengthens our global reputation.

#### What You Need to Know:

To uphold compliance, we must make sure that anyone working for Copeland has legal authorization to do so in their respective location. This applies to colleagues, contractors and business partners.

#### How We Support Compliance:

- Human Resources (HR) oversees all immigration requirements, including managing work permits, visas and other legal employment documentation.
- It is essential to notify HR immediately if there is any **change to your immigration status** or work authorization. Quick notification helps to avoid potential legal risks and ensures a seamless work process.

### Example

Janet had just joined Copeland as a software developer in the Singapore office. A few weeks into her role, she received notice from local authorities—her visa category had been reclassified under new government regulations. Instead of waiting for issues to arise, Janet immediately reached out to HR and explained the change. The HR team acted quickly, working with legal advisors to update her employment records and adjust her visa status accordingly. Thanks to Janet's proactive communication and the team's swift response, there was no disruption to her work. Together, they ensured that Copeland remained fully compliant with local labor laws—demonstrating how a quick heads-up can keep operations smooth and legally sound.

Compliance is not just a legal requirement; it is a responsibility we all share. By working together, we ensure that **Copeland's global workforce** remains a model for **ethical, lawful** and **responsible practices**.

*If you have **questions or need support**, the **HR department** is always ready to assist. At Copeland, we go beyond borders—but always within the law.*

## Insider Trading Laws

Adherence to applicable insider trading laws is essential to maintaining the integrity of financial markets. Ethical conduct and transparency are expected in all business relationships, in line with regulatory obligations and best practices.

### Definition of Insider Trading

Insider trading refers to buying or selling securities based on material, non-public information. This includes sharing confidential information with others who might use it to trade.

#### Example

Alex was part of a small team that learned Copeland was planning to acquire another company—a confidential project not yet public. Excited by the news, he mentioned it casually to Janet over coffee, joking about how great it would be to buy shares in the company before the announcement. Janet stopped him right away. “Alex, that’s insider information. Using it to buy shares, or even suggesting it to others, is illegal and against Copeland’s policies.” Alex realized the seriousness of the issue. He refrained from any such action and reported the discussion to Compliance to ensure everyone stayed clear of insider trading risks. Alex and Janet helped protect Copeland’s integrity and complied with the law.

### Preventing Insider Trading

Ensuring compliance with insider trading regulations requires adherence to the following principles:

**Trade securities of any company only when you are confident that you do not possess material, non-public information, ensuring ethical behavior and full compliance with regulations.**

Non-compliance may not only damage an organization’s reputation, but also expose individuals to significant personal consequences, including civil penalties, fines and criminal prosecution.

#### Example

Janet worked in the finance department and had early access to her company’s quarterly sales report before it was made public, including information about a new deal signed with a Company’s business partner. One day, a friend asked if she knew how the numbers looked and if it was a good time to buy shares. Janet knew that acting on this confidential information, or sharing it, was strictly prohibited. “I can not share that info—it’s insider knowledge,” she said firmly. Janet helped ensure company’s compliance with securities laws and maintained trust and financial integrity.

*Consult the Legal and Compliance Department before trading during blackout periods or when in doubt.  
Adhere to all insider trading regulations to avoid legal and ethical violations.*



## Human Rights

### Commitment to Human Rights

At Copeland, respecting human rights is not just a principle; it is a commitment deeply embedded in our culture and operations. We firmly uphold the dignity and equality of every individual by integrating global human rights standards into all facets of our business. Aligning with the United Nations Guiding Principles on Business and Human Rights, Copeland actively opposes discrimination, harassment and exploitation in any form.



### Operating Principles to Protect Human Rights

#### 1. Non-Discrimination and Equal Opportunity

We cultivate a strong sense of inclusion and belonging where individuals of all backgrounds, and with diverse perspectives, are embraced and treated fairly to enable a stronger workforce. At Copeland, it is the responsibility of all colleagues, agents, consultants, contract labor and partners to uphold the values of dignity and inclusion in every action taken on the company's behalf. We celebrate and respect the unique qualities and perspectives each individual brings, ensuring fair treatment, equal access and opportunities for professional growth. We foster a culture of belonging by actively promoting collaboration and participation, while ensuring that all employment-related decisions remain free from discrimination.

#### 2. Health and Safety

The health and safety of our colleagues and partners remain our top priority. We strive to provide a safe, efficient and comfortable working environment. By consistently adopting international safety standards and training programs, we minimize workplace incidents and ensure a secure environment for all.

#### 3. Compliance and Transparency Mechanisms

We believe in transparency and the right to be heard. If you suspect any human rights or code of conduct violations, we encourage you to report them safely and confidentially through the Copeland Global Ethics Hotline. All concerns are investigated promptly and addressed with immediate resolution.

Performance at Copeland is measured on achieving goals (the 'what') and living our values (the 'how').



## Child and Forced Labor

### Prohibition of Child and Forced Labor

We hold an unwavering commitment to eradicate child and forced labor from all aspects of our operations and supply chains. We strictly prohibit the use of child labor, forced labor, bonded labor and human trafficking. This policy applies to every corner of our global presence, requiring that all Copeland operations and business partners fully comply with local, national and international labor laws.

### Monitoring and Reporting Mechanisms

Ensuring adherence to this policy is not just our commitment but our responsibility. To achieve this, robust monitoring and auditing procedures are in place across facilities and supply chains worldwide. These audits are designed not only to identify risks but also to actively prevent them, setting an example for ethical practices in every region we operate.

Additionally, we encourage all colleagues and business partners to remain vigilant. We have established accessible reporting channels, allowing anyone within our network to promptly report instances of suspected child or forced labor. Such reports should be directed to Copeland's Legal and Compliance Department or submitted through the Ethics Hotline, ensuring timely and effective corrective action.

Together, we stand for ethical labor practices that safeguard rights, protect dignity and ensure compliance on a global scale. **Protecting every worker's future is not an option for us; it is a duty we uphold every day.**

## Modern Slavery. Human Trafficking

### Prohibition of Child and Forced Labor

We believe in a world free from the exploitation of modern slavery and human trafficking. Upholding ethical operations is a pillar of Our Values, and we are unwavering in our zero-tolerance approach to any form of forced or exploitative labor. This commitment is not just limited to our operations but extends across our global supply chain, ensuring every touchpoint reflects our ethical standards.

### Actions to Combat Human Trafficking

1. Training programs for colleagues on recognizing and addressing risks of human trafficking.
2. Robust contractual agreements requiring suppliers to comply with all anti-slavery regulations and Copeland's Supplier Code of Conduct.
3. Standard global framework of controls to help reduce the risk of non-compliance in our supply chain: onboarding due diligence, ongoing monitoring, transparency and regulatory alignment through public disclosures and compliance reporting.







## Conflict Minerals

### Operating Principle on Sourcing Conflict Minerals

At Copeland, responsible sourcing is at the heart of our commitment to ethical business practices. We actively ensure that conflict minerals used in **our products are sourced in compliance with the Dodd-Frank Act and other international regulations**, prioritizing integrity and responsibility across all areas of our supply chain.

### Transparency and Reporting

To maintain accountability and foster trust with our colleagues, contractors, stakeholders and business partners, we implement rigorous due diligence processes to trace the origins of conflict minerals. We publish annual conflict mineral reports, providing clear insights into our supply chain operations. This dedication enables us to meet both regulatory requirements and customer expectations.

**Together, we are safeguarding transparency while advancing sustainable solutions that protect lives, support communities and uphold the integrity of our business.**



## Supplier Code of Conduct

### Ethical Standards for Suppliers

At Copeland, we hold ourselves and our partners to the highest ethical standards. Suppliers are required to abide by Copeland's Supplier Code of Conduct, which ensures adherence to the following principles:

- **Human Rights Compliance:** Upholding and respecting fundamental human rights in all operations.
- **Anti-Bribery Laws:** Strict prohibition of bribery and corruption to maintain transparent and fair business practices.
- **Environmental Sustainability:** Commitment to eco-friendly practices that support long-term environmental health and align with global sustainability goals.

### Monitoring and Enforcement

To ensure suppliers are compliant with these standards, we conduct routine audits and risk assessments. Any instances of non-compliance are addressed through detailed corrective action plans. However, repeated or severe violations may lead to the termination of the partnership.

### Reporting Mechanisms

Suppliers must report any known violations without delay. Copeland offers clear, accessible channels for prompt reporting, including an anonymous submission link to:

- **Copeland's Global Ethics Hotline** ([Ethics Hotline & Whistleblower Protection](#))
- To ensure a **fair and transparent process**, every complaint will be:
  - **Promptly investigated**
  - **Thoroughly reviewed**
  - **Handled impartially**

**Confidentiality will be maintained** as much as possible, respecting the sensitive nature of such issues.

### Our Responsibility, A Shared Vision

Together with our suppliers, we aim to drive meaningful change. By setting an example in sustainable practices, ethical governance and respect for human rights, we ensure progress that benefits not just businesses but entire communities and ecosystems.

Copeland's commitment to global sustainability and ethical practices is unwavering, and we are proud to have partners who share the same dedication to excellence and integrity.



## Accurate Books and Records

### Maintaining Accurate Records

At Copeland, we are committed to upholding the highest standards in maintaining accurate and transparent records. Every business transaction must be recorded accurately and in a timely manner, ensuring it reflects the true nature of our operations. Any attempts to alter records, falsify documents or conceal important details are strictly prohibited and will not be tolerated.

### Sarbanes-Oxley Compliance

Compliance with the Sarbanes-Oxley Act (SOX) supports financial transparency, integrity and trust across business operations. Ethical conduct and strong internal controls are essential to maintaining compliance and upholding public company standards.

Senior financial officers are expected to demonstrate the highest levels of honesty and integrity in carrying out their responsibilities, serving as role models for ethical conduct and accountability in all financial matters.



**Any suspicion of non-compliance must be reported immediately to the Legal and Compliance Department.**

## Tax Compliance (Tax Evasion)

### Adherence to Tax Laws

Copeland is fully dedicated to complying with all applicable tax laws, ensuring integrity in its tax practices across global operations. Specifically, colleagues, business partners and business units must:

- **Comply with all domestic and international tax regulations.**
- **Report taxes accurately** and complete payments within deadlines.
- **Maintain transparency and accountability** in all fiscal matters.

### Policies Against Tax Evasion

Our zero-tolerance policy against tax evasion ensures that ethical practices remain at the core of Copeland's operational Values. To uphold this, colleagues and business partners are strictly prohibited from:

- Falsifying financial records or misrepresenting financial positions.
- Participating in or facilitating activities to evade tax obligations of Copeland, its employees, suppliers and customers.

## Financial Records and Expense Reports

### Guidelines for Financial Documentation

Maintaining accurate financial documentation is critical for preserving trust with stakeholders and ensuring compliance with global regulations. All financial transactions, including expense reports, must:

- Be thoroughly documented and accurately recorded.
- Clearly reflect the true nature of transactions to guarantee transparency and integrity in reporting.

### Accuracy in Expense Reporting

Truthful and detailed submissions are required for all expense reports. Reports should include:

- Original receipts and supporting documents for every claimed expense.
- A clear and accurate representation of transactions.

Misrepresentation or falsification within expense reports is strictly prohibited and will result in disciplinary action.

## Management of Corporate Records

All colleague must strictly adhere to Copeland's records management program, maintaining accurate and complete records in accordance with legal and regulatory requirements. Unless explicitly instructed otherwise, colleagues are required to preserve all relevant documents and files, ensuring compliance with company guidelines.

If any colleague becomes aware of improper conduct, such as unauthorized payments, bribes or gratuities, it is their duty to ensure that all associated documents, records and files remain intact. Under no circumstances should colleagues destroy, remove, alter or modify any documents or accounting records to conceal or misrepresent a transaction or misconduct.

Maintaining accurate and complete records is critical to ensuring transparency, accountability and compliance with both internal policies and applicable laws.

*Always consult the **Legal or Compliance Department** if you are unsure about **document retention requirements** in any situation.*





## Data Privacy and Confidentiality

### Protecting Personal and Company Data

At Copeland, the protection of personal, company and customer data is a critical priority. Upholding global privacy standards is central to every aspect of our operations, ensuring we operate with integrity in all regions. All colleagues and business partners are required to comply with relevant data protection laws, including the GDPR and other regional regulations.

### Confidentiality Obligations

We value the trust placed in us to safeguard sensitive information. All colleagues, contractors and business partners must uphold the strictest levels of confidentiality when handling the following types of information:

- **Proprietary Data & Trade Secrets:** Ensure these remain protected to maintain Copeland's competitive advantage.
- **Financial Records & Customer Information:** These details must be treated with utmost care to protect the integrity of the organization and its customer relationships.
- **Employee Data:** Must be handled with strict confidentiality to comply with privacy regulations and foster trust within the workforce.

### Key Principles for Handling Data:

- **Processed Securely:** All data must be handled in a way that guarantees its confidentiality at every stage.
- **Authorized Use Only:** Personal and corporate data shall be accessed, processed and used solely for lawful and legitimate business purposes, in accordance with applicable laws, regulations and company policies.

### Our Global Responsibility

At Copeland, maintaining confidentiality and data protection reflects our commitment to excellence. With over 18,000 colleagues and a presence in 40+ countries, we recognize the global impact of securing sensitive information, protecting the privacy of all stakeholders and fostering trust within our market-leading climate solutions industry.

### Your Role in Data Protection

Every individual in the Copeland ecosystem plays a critical role in upholding privacy standards. By following these guidelines, we can collectively ensure that trust and transparency remain at the heart of our operations.

### Example

If you are working with proprietary product designs, sharing these outside of authorized teams—even unintentionally—could jeopardize Copeland's market positioning.

*If you need further guidance or clarification, please consult our **global privacy policy** or contact the **Data Privacy Department**. Working together, we can protect sensitive information and create a **secure environment** for everyone we serve.*



## Intellectual Property and Use of Company Assets and Business Systems

Protecting intellectual property is critical to maintaining Copeland's position as an industry leader in innovation. Every colleague, contractor, stakeholder and business partner must play a role in safeguarding our valuable assets, including patents, trademarks, domain names, copyrights and trade secrets.

### Protecting Personal and Company Data Company Ownership of Intellectual Property

All intellectual property created, conceived, developed, reduced to practice or acquired by Copeland colleagues within the scope of their employment with the company or any affiliate, or utilizing resources of the company or any affiliate, shall be the sole and exclusive property of the company. Colleagues are required to promptly disclose such IP to the company and execute any necessary documents to confirm the company's ownership.

For contractors and agents, the specific terms detailing the assignment or licensing of intellectual property rights should be outlined in their individual contractual agreements with the company, ensuring the company obtains the necessary rights for the work performed. In the absence of a written agreement to the contrary, all intellectual property created, conceived, developed, reduced to practice or acquired for the company or any affiliate, or utilizing the resources of the company or any affiliate, shall be the sole and exclusive property of the company.

### Protection of Intellectual Property

All colleagues, contractors, stakeholders and business partners have a responsibility to protect the company's intellectual property. This includes:

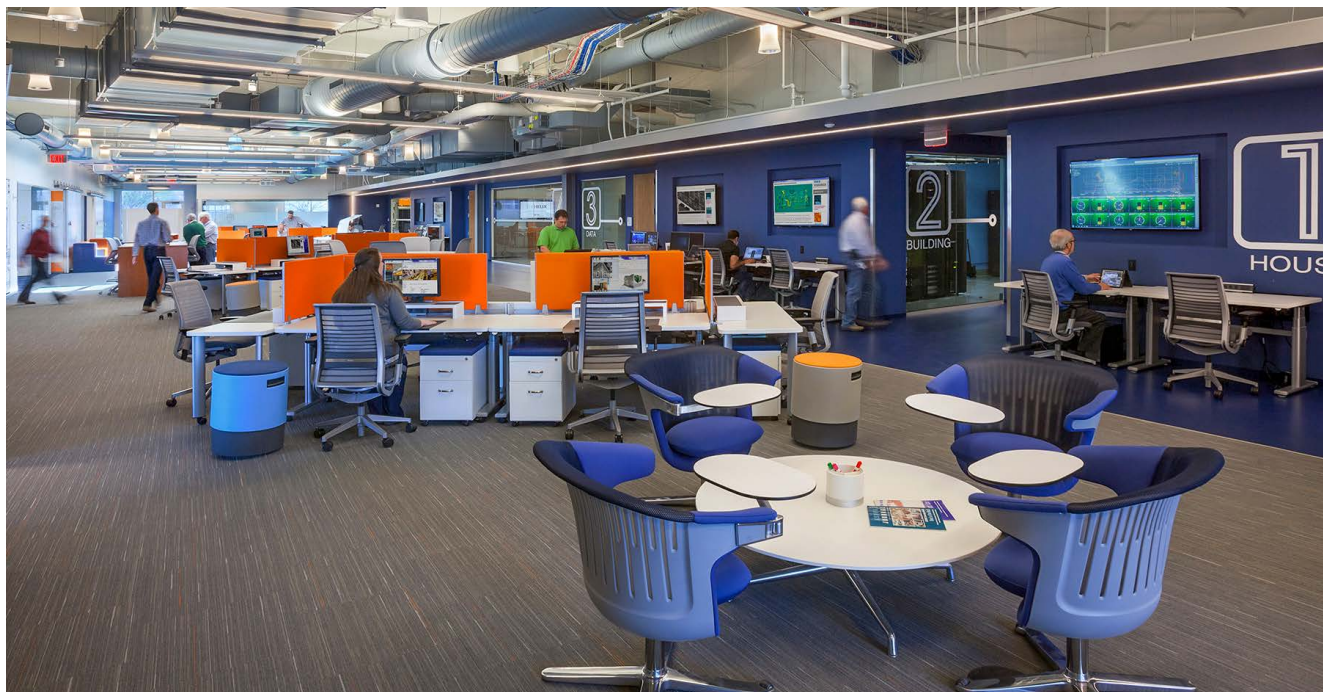
**Maintaining Confidentiality:** Colleagues must not disclose confidential or proprietary information to unauthorized individuals or entities, either internally or externally, during or after their employment/engagement.

**Secure Handling of Information:** Exercise diligence in handling and storing Copeland IP, utilizing secure systems and practices as instructed by the company.

**Non-Disclosure Agreements (NDAs):** Adhere to the terms of all NDAs signed with the company and third parties. Ensure that appropriate NDAs are in place before sharing any Copeland confidential or proprietary information with any third party.

**Proper Use of Resources:** Company resources (e.g., computers, networks, software) must only be used for legitimate business purposes and not for making unauthorized use or distribution of IP.

**Reporting Misuse:** Any suspected or actual unauthorized disclosure, use or misappropriation of company IP must be immediately reported to the Copeland Legal & Compliance Department.



## Respect for Third-Party Intellectual Property

Just as we protect our own intellectual property, we are committed to respecting the IP rights of others. This includes:

- **No Unauthorized Use:** Do not use, copy, distribute, modify or reproduce copyrighted materials, trademarks, patented inventions or confidential information belonging to third parties without authorization or a valid license.
- **Licensing:** Use only properly licensed software and creative assets on company systems. Unauthorized use of software, images, videos, designs or other creative materials is strictly prohibited. Always ensure that all digital resources and materials comply with their respective use licenses and permissions.
- **Due Diligence:** Conduct appropriate due diligence to ensure that any third-party IP intended for use by the company is legitimately acquired and used in compliance with all relevant laws and agreements.
- **Avoiding Infringement:** Be mindful of potential IP infringement when developing new products, services or marketing materials. Follow the process for completion of IP deliverables in Copeland's NPD process and seek guidance from the Legal & Compliance Department if there are any doubts.

## Proper Use of Company Assets and Business Systems

Copeland's assets and IT systems are foundational to achieving operational excellence. It is essential to use company resources, such as email, IT systems and devices, exclusively for authorized business purposes and permitted personal use.

While personal use of these resources is permitted, it must remain minimal and comply with Copeland's policies. For instance, checking personal emails during breaks is acceptable, but using company devices to download unauthorized software is not.

**Misuse or unauthorized access to our business systems is a serious violation that will not be taken lightly.** If breaches occur, such as attempts to retrieve sensitive information without permission, immediate action will follow to prevent future risks.



## Cybersecurity and Acceptable Use of Artificial Intelligence (AI)

At Copeland, we recognize that **cybersecurity** and the **ethical and transparent use of Artificial Intelligence (AI)** are essential to protecting our operations, maintaining trust and driving innovation responsibly.

### Policies on Cybersecurity

To safeguard our systems and data, all colleagues, contractors and business partners must actively contribute to maintaining organizational security by doing the following:

- **Review Copeland's Electronic Media and Acceptable Use Policy and adhere to IT security protocols** to ensure compliance with global standards.
- **Use secure passwords and implement robust access controls** to prevent unauthorized access.
- Use only **software and communication technologies that are authorized** by the company and **appropriately licensed**, in accordance with applicable laws and internal policies.
- **Report any suspicious activities immediately** to prevent potential threats from escalating.
- **Participate in mandatory cybersecurity training** to stay informed on the latest best practices.

### Ethical Use of Artificial Intelligence (AI)

Copeland is committed to ensuring all AI tools and applications are developed and deployed with the utmost responsibility and integrity. This means our AI practices align with ethical standards, global legal frameworks and strict privacy regulations.

- **Compliance Matters:** AI tools we use or build are reviewed to ensure they adhere to ethical benchmarks and support data privacy laws.
- **Enhancing Operations with Integrity:** AI solutions are implemented to optimize workflows and improve decision-making without compromising security or integrity.

When used responsibly, AI can amplify efficiency and innovation. However, we understand that transparency and ethical principles are critical to earning the trust of customers and communities globally.

We can only achieve secure systems and responsible AI usage when we work together as a team. We depend on your active participation in these efforts across all levels of external and internal engagement—from contractors to stakeholders. Together, we are equipped to lead responsibly and build smart solutions that pave the way for a more secure and ethical digital future.

#### Examples



**Responsible Behavior:** Alex needed software to edit a marketing presentation with custom graphics. Instead of downloading something himself, he submitted a request through the Service Desk. By following the correct process, Alex made sure the software was safe, legal, and supported—and avoided putting company systems or data at risk.



**Irresponsible Behavior:** Janet needed to convert a file to PDF. Without checking with IT, she downloaded a free tool she found online. The software was not authorized by the Company and contained unwanted software. Soon after, her computer began crashing, and IT found the tool had created a security vulnerability. By bypassing company policies, Janet exposed the organization to unnecessary risk and violated the policy.



## ***Our People***

At Copeland, we believe that our people are our greatest asset. We are committed to fostering a workplace built on dignity, respect, fairness and shared purpose. These are not just words; but rather a foundation that drives colleague engagement, strengthens our culture of accountability and ensures everyone feels valued and heard.

## Inclusion and Belonging

At Copeland, we foster a culture of inclusion and belonging where individuals of all backgrounds and perspectives are respected, supported and empowered to contribute to our shared success.

### Our Commitment

We are committed to treating all colleagues fairly and making employment-related decisions—such as hiring, promotion, compensation and training—based on individual merit, performance and qualifications. We do not tolerate discrimination on the basis of race, color, creed, religion, sex, pregnancy, national origin, ancestry, citizenship status, age, marital or partnership status, sexual orientation, gender identity or expression, disability, military or former military status or any other status protected by applicable laws.

We recognize and appreciate the unique talents, experiences and perspectives each person brings to our workplace.

At Copeland, we are committed to supporting career development by fostering a culture of continuous learning, growth and opportunity for all colleagues.

### Creating a Culture of Belonging

We believe that belonging is essential to collaboration, innovation and performance. We promote this by:

- Listening openly and valuing different perspectives
- Encouraging respectful dialogue and team engagement
- Providing regular opportunities for feedback through engagement surveys, townhalls, and other forums

### Freedom of Association

We fully respect the rights of employees to organize, form, or join (or not join) labor unions or similar organizations. We are committed to conducting all interactions and negotiations in good faith and with mutual respect.





## ***Prevention of Harassment and Bullying***

Copeland is committed to providing a workplace that is respectful, inclusive and free from harassment, bullying and any form of abusive conduct.

### **Zero Tolerance for Harassment**

We prohibit all forms of harassment, including sexual harassment, as well as conduct that demeans, intimidates or threatens others. This includes harassment or discrimination based on race, color, creed, religion, sex, pregnancy, national origin, ancestry, citizenship status, age, marital or partnership status, sexual orientation, gender identity or expression, disability, military or former military status or any other legally protected category.

Examples of prohibited behavior include:

- Unwanted sexual advances or requests for favors
- Offensive jokes, slurs, name-calling or insults
- Ridicule, mockery or intimidation
- Physical threats or assaults
- Displaying offensive visuals or materials
- Bullying or other conduct that disrupts a respectful work environment

Harassment is unlawful when it is severe or pervasive enough to create an intimidating, hostile or abusive environment, or when enduring such conduct becomes a condition of employment.

### **Reporting Concerns and Seeking Support**

If you experience or witness harassment or bullying, we encourage you to speak up. You can report concerns to:

- Your manager or HR representative
- The Copeland Global Ethics Hotline ([available](#) anonymously)

All reports will be:

- Promptly and objectively investigated
- Treated with appropriate confidentiality
- Addressed through fair and consistent corrective action, as needed

### **Protection from Retaliation**

Copeland does not tolerate retaliation. Any individual who, in good faith, reports a concern or participates in an investigation is protected from reprisal. We are committed to fostering an environment where everyone feels safe to speak up.



## *Workplace Safety, Health and Well-Being*

### Ensuring Workplace Safety

At Copeland, workplace safety is a core value. By adhering to strict health and safety regulations and implementing comprehensive safety programs, we create environments where our colleagues can work with confidence. Our goal is zero incidents.

Safety leaders, along with site leadership work proactively with front-line colleagues to address safety concerns and ensure a safe working environment. Here's how we maintain a safe workplace:

**Safety Training:** All colleagues must complete safety training, including the prevention of Serious Incidents and role-specific training to stay updated and prepared.

**Proactive Hazard Reporting:** We encourage everyone to report hazards to leadership promptly. Acting quickly prevents incidents before they happen.

**Shared Ownership of Safety:** Through collaborative initiatives, we foster a culture where workplace safety is everyone's responsibility.

### Promoting Health and Well-Being

At Copeland, supporting the physical, mental, and emotional well-being of our colleagues goes hand-in-hand with maintaining safety. We believe a thriving workforce is vital to our long-term success. Here's how we invest in the well-being of our team:

- **Flexible Work Options:** By offering remote work opportunities (when applicable) and flexible schedules, we enable colleagues to achieve a healthy work-life balance.
- **Wellness Programs:** Our programs encourage healthy lifestyles through fitness challenges, mindfulness workshops, and access to on-demand health resources.
- **Ergonomic Support:** Designing workspaces with ergonomic furniture and tools allows our teams to work comfortably and productively for longer hours when required.

**Together, we continue to set the standard for workplaces where health, safety, and well-being go beyond compliance and become the core of who we are.**

## Community Engagement: Political and Charitable Contributions

At Copeland, we encourage colleagues to engage in community activities, including those that may be political in nature. However, all political activity must adhere to the following guidelines to uphold our commitment to ethics and compliance:

- Company funds or assets must never be used for political contributions, including donations to political parties, candidates, or activities.
- Reimbursements for any political contributions are strictly prohibited.
- Participation in all political activities must occur on personal time, not during working hours, and at the individual's personal expense.

We value and respect our colleagues' rights to participate in the political process, provided these activities are conducted in a manner that separates personal involvement from the company's operations.

### Empowering Futures with Inspiring Horizons

We believe in creating a lasting impact that strengthens communities and transforms lives. Our **Inspiring Horizons** program is dedicated to empowering children, youth, and young adults in less advantaged neighborhoods and underrepresented groups.

By providing connection, access and education, we help unlock potential improving lives today and for future generations.

It is strictly prohibited for any Copeland colleague or business to make or offer to make a political donation for the purpose of improperly influencing an individual's or entity's act or decision with respect to a business opportunity or to secure an improper advantage to obtain or retain business.

For further guidance or to address any uncertainties, please consult with the **Legal and Compliance Department**.







## Speaking on Behalf of Copeland

### Authorized Spokespersons

At Copeland, only **designated colleagues** are authorized to speak on behalf of the company in matters involving **media, investors, research analysts, regulators, or other external inquiries**. Before accepting a speaking opportunity, please consult your respective business marketing team or corporate communications team for guidance and approval. Unless you have been expressly authorized, **do not make statements on behalf of Copeland**, instead please refer any enquiries to Copeland's Media or Investor Relations team.

### Guidelines for Public Speaking Opportunities

When engaging in **public speaking** or participating in **conferences**, it is crucial to follow these guidelines:

- **Clearly distinguish** personal opinions from official company positions to avoid any misrepresentation.
- **Never disclose** confidential or proprietary information in public forums, ensuring the company's intellectual property and sensitive data remain protected.

*When creating presentation materials for a speaking opportunity, be sure to use the official Copeland PowerPoint template and verify that all creative assets are properly licensed.*

## Social Media Use

Social media offers opportunities to engage and connect, but it must be used responsibly to uphold Copeland's reputation and core values. Whether on LinkedIn, WeChat, or personal blogs, colleagues and business partners should:

- **Clearly separate personal opinions** from official company positions to prevent any misrepresentation. You may also consider adding a disclaimer, such as "opinions expressed here are my own," to your profile description.
- **Never share** any confidential or proprietary company information. Make sure not to preemptively share Copeland news that should be announced through official channels first, such as a press release.
- **Refrain from misrepresenting** Copeland or participating in activities that could harm the company's image.
- **Ensure all online content** associated with Copeland is professional, supports our Values, and upholds the high standards of our brand and reputation. Whenever possible, reference publicly available Copeland sources such as official links, news, or website content instead of creating original content about Copeland. Additionally, verify that all third-party creative assets used are properly licensed and adhere to brand guidelines.

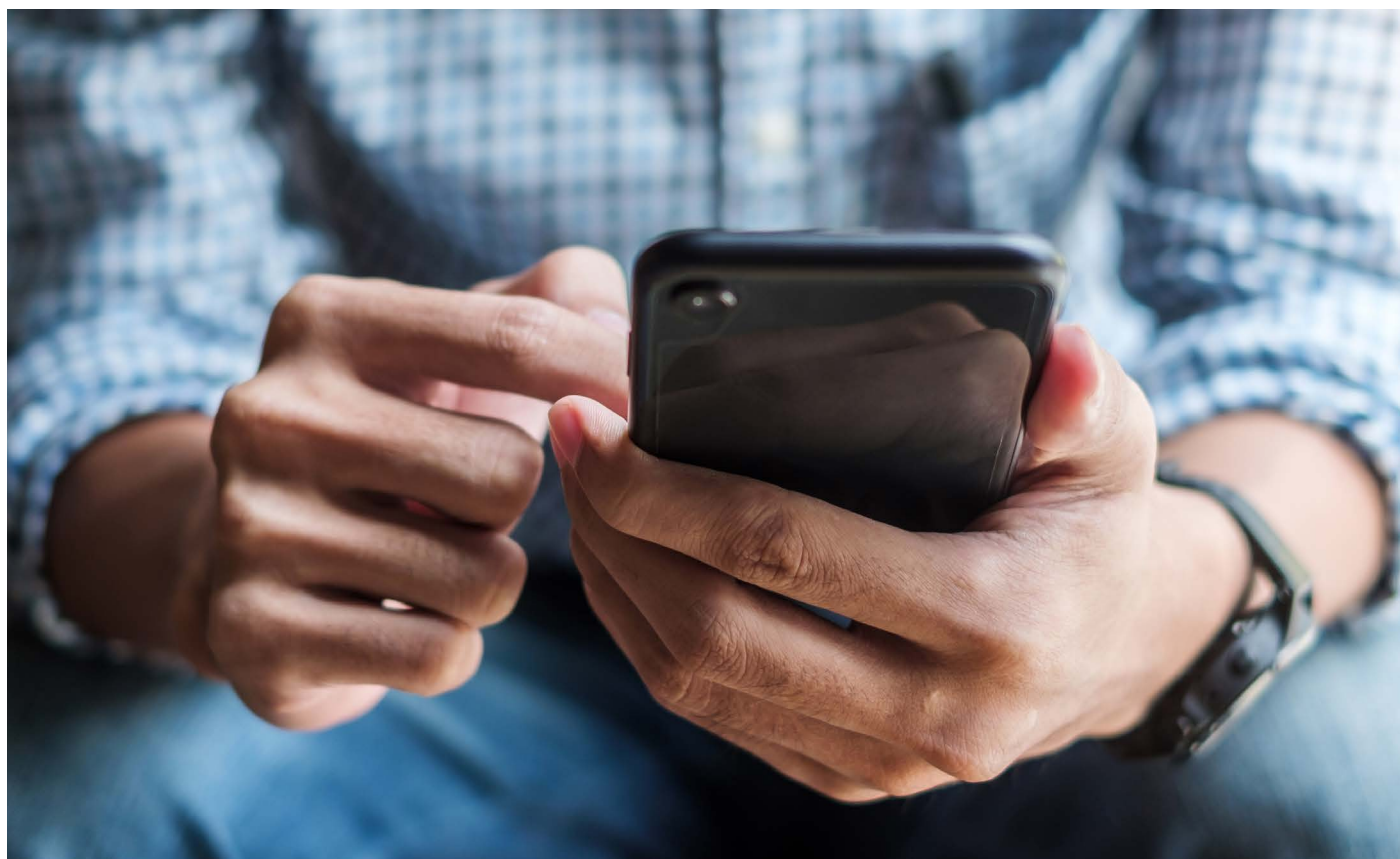
### Examples



**Responsible Use:** Janet was excited to share the news when Copeland launched a new sustainability initiative. She posted an approved announcement on her LinkedIn profile, adding a personal note about how proud she was to work for a company driving innovation in climate-friendly technologies. Her post reflected Copeland's core values and helped build a positive public image—showing how colleagues can be great ambassadors when they share responsibly.



**Irresponsible Use:** Alex is part of a team working on a Copeland product that is not public yet. He knew his followers would be excited about the product so he posted a photo on Instagram revealing confidential designs, exposing proprietary information to competitors and damaging trust in Copeland's ability to protect sensitive data.







## *Environmental Performance/Sustainability*

At Copeland, we understand the critical importance of environmental stewardship. This responsibility is not just a necessity but a commitment we wholeheartedly uphold as a global leader in advancing sustainable practices. Through innovative programs, strategic partnerships, and forward-thinking policies, we actively work to reduce environmental impacts and foster a future underpinned by sustainability.





## ***Sustainability Initiatives***

### **Overview of Copeland Sustainability Programs**

Copeland actively pursues sustainability through initiatives that minimize our environmental footprint while enhancing the energy efficiency of our products. From reducing greenhouse gas emissions to improving waste management practices, our sustainability programs are integrated into our operations and decision-making processes.

### **Encouraging Environmentally Friendly Practices with Business Partners and Suppliers**

Sustainability extends beyond Copeland's operations to our global network of suppliers and business partners. We collaborate with partners to promote:

- Waste reduction and responsible resource management.
- Energy optimization to improve efficiency.
- Adherence to international sustainability standards.

All suppliers are expected to comply with Copeland's Supplier Code of Conduct, which prioritizes environmental responsibility.

## ***Environmental Protection***

### **Policies for Environmental Protection**

At Copeland, we believe in global action for a better future. We strictly adhere to environmental laws and regulations worldwide, making sustainability the foundation of our operations. Our policies ensure responsible resource use, reduced emissions, and sustainable practices in everything we do—from product design to supply chain management.

### **Commitment to Sustainable Practices**

Sustainability is not just a goal; it is ingrained in how we operate. From smarter product designs to eco-conscious manufacturing, Copeland prioritizes solutions that balance business growth with environmental responsibility. This ensures that we create breakthroughs that benefit both society and the planet simultaneously.

### **Sustainable Material Use**

It is the policy of Copeland to minimize impacts to the environment from our processes and products.

We accomplish this by complying with applicable environmental laws and regulations, reducing the amount and toxicity of our waste, and reducing the carbon footprint of our processes. We help our customers reduce their carbon emissions and improve energy efficiency. Our innovations address issues like climate change, growing populations, electricity demands, and complex global supply chains by: supporting the energy transition across heating, cooling, refrigeration and industrial applications; accelerating the adoption of climate-friendly, low-GWP and natural refrigerants; and safeguarding perishable food and medical products through an efficient and sustainable cold chain.

## ***Undertaking Initiatives to Promote Greater Environmental Responsibility***

### **Initiatives for Environmental Responsibility**

At Copeland, sustainability is a shared mission. From tackling energy efficiency and waste reduction to team-driven sustainability programs, we translate responsibility into action.

### **Colleague Involvement**

We actively engage colleagues in our sustainability mission through training, awareness campaigns and volunteer opportunities. This commitment ensures that every individual at Copeland is empowered to contribute.





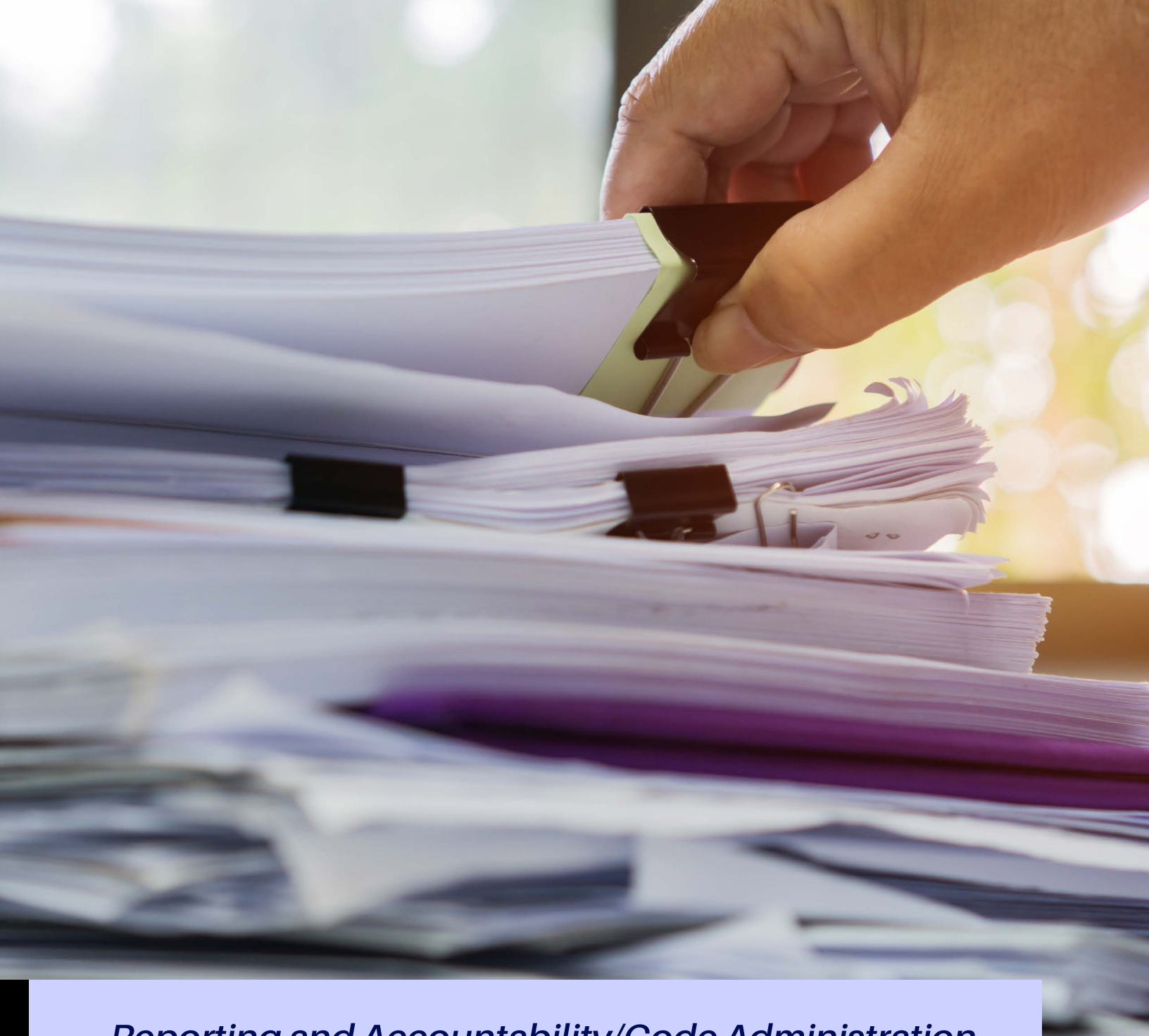
## Environmental Principles

- We **integrate** environmental responsibility into our Copeland Business System and processes.
- We **comply** with laws, **eliminate** hazardous substances and **manage** products responsibly.
- We **minimize** risks through safe practices, technologies and prompt risk reporting.
- We **enhance** efficiency to reduce GHG, air emissions, water and energy impact.
- **Responsibility** lies with leaders, supported by facility teams and all employees.
- We **train** leaders on compliance, pollution prevention and technological advancements.
- We **assess** environmental performance through regular audits and verifications.
- We **create** innovative products to help customers achieve sustainability goals.

For more details please consult our **COPELAND ENVIRONMENTAL POLICY**







## ***Reporting and Accountability/Code Administration***

## Ethics Hotline & Whistleblower Protection

### Reporting Channels for Ethical Concerns

At Copeland, we uphold the highest ethical standards by ensuring every individual has a voice. Colleagues, business partners and stakeholders can report ethical concerns through multiple channels, including:

- **Immediate supervisor**
- **Local HR department**
- **Copeland's confidential Ethics Hotline, accessible via phone or online through Ethics Hotline**

### Protection for Whistleblowers

At Copeland, standing up for what is right comes with protection. We guarantee that individuals raising concerns in good faith are shielded from all forms of retaliation, including:

- Dismissal or disciplinary action
- Threats or unfavorable treatment

### Your courage deserves respect, not consequences.

Confidentiality is our priority. We ensure your identity remains protected, and anonymous reporting is always an option. All concerns are thoroughly investigated by impartial personnel, and where possible, appropriate feedback is provided to you directly.

#### Example

Alex witnessed behavior at work that did not sit right—he suspected a team member was manipulating project expenses. Unsure about going directly to a manager, he decided to report the issue anonymously through Copeland's ethics hotline. After submitting the report, Alex received a unique report key that allowed him to check in for updates and provide more information if needed—without ever revealing his identity. The case was thoroughly investigated, the issue resolved and Alex's identity remained protected throughout. His decision to speak up helped uphold Copeland's integrity, showing how anonymous tools can empower colleagues to do the right thing safely.

Our **Global Ethics Hotline** was developed so that anyone (supplier, customer, colleague, business partner) can speak up if they have concerns. The hotline is available 24/7 by phone and online (<https://copelandhotline.ethicspoint.com/>) in more than 150 languages, including all Copeland local languages (Czech, English, French, Italian, Marathi, Portuguese, Simplified Chinese, Spanish, Thai).

You can choose to remain anonymous or provide contact details for follow-ups. To ensure transparency, every report is acknowledged with a **unique report key and password**, allowing you to check the status of your concern at any time.

## Reporting Violations (Illegal or Unethical Behavior)

### Procedure for Reporting Violations

If you witness or suspect actions that are illegal or unethical, we urge you to act promptly. Such concerns can be reported to:

- **An immediate supervisor**
- **An HR representative**
- **The Ethics Hotline**

We maintain clear protocols to acknowledge and respond to reports while respecting your privacy at every stage.

### Investigation and Response Mechanisms

All concerns undergo **thorough investigations** led by **impartial personnel**. Updates are provided throughout the process, and actions are taken to **address violations** while preserving **confidentiality**.



*If you have a concern, do not hesitate to make your voice heard. Together, we can shape a more responsible and ethical future.*

## Non-Retaliation

### Commitment to Non-Retaliation

Creating a workplace where honesty is valued requires trust. At Copeland, **no colleague, business partner or stakeholder will face retaliation for submitting concerns in good faith**. This commitment ensures an open and safe environment for addressing ethical challenges.

### Support for Those Reporting Concerns

At Copeland, we believe in supporting individuals who stand up for integrity. Beyond our non-retaliation guarantee, we offer resources, including:

- **Counseling Services:** Access to professional guidance for those feeling overwhelmed.
- **Guidance:** Personalized input to help resolve ethical challenges effectively.

### Example

Janet, a contractor working closely with Copeland, noticed that a supplier was engaging in unethical practices. Concerned, she reported her observations to Alex, who managed supplier relations. Understanding the importance of supporting those who speak up, Alex arranged for Janet to receive counseling and guidance, ensuring she felt heard and supported throughout the process. Thanks to this care, Janet remained confident in the partnership, and Copeland was able to address the issue while maintaining trust and ethical standards.

By fostering an environment built on transparency, accountability and respect, Copeland encourages everyone to take part in upholding ethical practices across our global operations.



## ***Code Administration***

### **Enforcing the Code of Conduct**

At Copeland, upholding our Code of Conduct is a shared responsibility. Together with the HR and Legal teams, our leadership ensures the Code is enforced consistently across all regions where we operate. For example, if a colleague deliberately breaches confidentiality or misuses company resources, the situation is thoroughly investigated, and appropriate disciplinary action is taken. This approach reinforces our commitment to integrity and creates a fair, accountable workplace.

### **Training & Certification**

Understanding our ethical principles is critical to building a strong and unified team. That is why all colleagues participate in mandatory annual training on the Code of Conduct. This training equips you with practical knowledge to handle real-world situations, like identifying and reporting potential conflicts of interest. To confirm your understanding, you will complete a certification process, ensuring everyone at Copeland fully commits to the Code's principles and values.

By working together to uphold these standards, we create a workplace we can all be proud of, where doing what is right is not only recognized but celebrated.

### ***Waivers of the Code***

Any waiver of a provision within this Code for executive officers or directors at Copeland requires formal approval from the Board of Directors or an appointed committee. Such waivers will be disclosed promptly, in compliance with applicable securities laws and stock exchange regulations.

The Code underscores our commitment to transparency, ethical leadership and global regulatory standards, guiding our colleagues, contractors, stakeholders and business partners across all regions where we operate.





## Conclusion

The Copeland Code of Conduct reflects our deep commitment to ethical leadership, sustainability and accountability. It embodies the values that guide how we work with one another, our business partners, customers and the communities we impact worldwide.

At Copeland, every individual, whether colleague, contractor or stakeholder, plays a vital role in upholding our integrity. By acting with transparency, fairness and respect for both the environment and human rights, we ensure our operations not only meet global standards but set them. For example, by adopting energy-efficient cooling solutions, we are directly contributing to lowering carbon emissions across residential, commercial and industrial markets.

Together, we cultivate a culture of innovation, excellence and responsibility, ensuring that our actions create lasting value for current and future generations. Imagine the impact of safer food distribution or reduced energy consumption, enabled by groundbreaking technologies from Copeland. This is how we turn principles into tangible results.

When we adhere to this Code, we do not just safeguard Copeland's reputation; we commit to improving the world, one solution at a time, fostering a brighter, more sustainable future.

**Thank you for your dedication to these core values.**

By standing together and holding ourselves to the highest standard, we are ensuring Copeland's continued success as a global leader in sustainable climate technology.