

## **The Trane Technologies’ Canadian Subsidiaries’ Joint Report under the Canada’s Fighting Against Forced Labour and Child Labour in Supply Chains Act of 2023**

The following joint modern slavery report (“Modern Slavery Report”) is published on behalf of Trane Canada ULC, Trane Investments Canada Inc., Arctic Cool Chillers Limited, and Brainbox AI Inc. (“the Trane Technologies Canadian Subsidiaries”) for the 2025 fiscal year in compliance with Canada’s Fighting Against Forced Labour and Child Labour in Supply Chains Act of 2023 (the “Act”). The Trane Technologies Canadian Subsidiaries are part of Trane Technologies plc’s (the “Company”) global modern slavery compliance program. Therefore, the information provided below from the Company’s global modern slavery compliance program applies to the Trane Technologies Canadian Subsidiaries.

Trane Technologies plc, the ultimate parent company for the Trane Technologies Canadian Subsidiaries, also publishes an annual modern slavery statement in compliance with the United Kingdom Modern Slavery Act of 2015 and the Australian Modern Slavery Act of 2018. It is available on the Trane Technologies plc homepage at:

[https://www.tranetechnologies.com/content/dam/cs-corporate/pdf/company/legal/Modern\\_Slavery\\_Act\\_Statement.pdf](https://www.tranetechnologies.com/content/dam/cs-corporate/pdf/company/legal/Modern_Slavery_Act_Statement.pdf)

### **Company Overview**

Trane Technologies plc, a public limited company incorporated in Ireland in 2009, and its consolidated subsidiaries is a global climate innovator that brings sustainable and efficient solutions to buildings, homes and transportation through our strategic brands, Trane® and Thermo King®, and our environmentally responsible portfolio of products, services and connected intelligent controls.

### **The Company’s Supply Chain**

Trane Technologies is a global company with a broad product and service portfolio. Our brands bring sustainable, efficient heating and cooling solutions to buildings, homes, and transportation. Our manufacturing facilities are located across several countries, and we ship products to customers globally. We source raw materials, components, products, and services from more than 28,000 suppliers across the globe. We work systematically to ensure that our suppliers share our values and continually improve their environmental and social conditions for the benefit of local communities and the planet.

## **Supply Chain Annual Modern Slavery Risk Assessment**

The Company is committed to taking steps to ensure that human trafficking and forced labor are not taking place in its supply chain or business. The Company is aware that a complex global supply chain may be associated with the risks of modern slavery when raw materials, components, products, or services pass through multiple tiers of suppliers.

The Company uses a risk assessment process that evaluates suppliers' compliance with its Business Partner Code of Conduct.

Additionally, the Company continued using a risk-based approach to survey suppliers in jurisdictions and industries that have a higher risk of modern slavery and human trafficking. This approach involves an annual review of our supplier base to identify suppliers in certain industries or locations or those providing commodities or services identified as having a higher risk of modern slavery and human trafficking. Suppliers identified through this process are in-scope for the annual due diligence process. To obtain 2025 full fiscal year data on suppliers, the Company completed supplier due diligence in 2026. Suppliers were asked to provide complete 2025 data.

The Company continues to collaborate with a third-party supply chain data management solution to facilitate the collection and management of supplier Human Trafficking Survey data. This solution deploys the [Slavery & Trafficking Risk Template \(STRT\)](#) through a streamlined process. The STRT is a free, open-source industry standard template created by the [Social Responsibility Alliance](#) designed to help companies with their supply chain modern slavery due diligence. The STRT's due diligence scope includes questions regarding forced labor, human trafficking, child labor, freedom of association, the right to collective bargaining, discrimination, migrant workers, third-party employees and the use of recruiters, and commercial sex acts. These topics covered in the STRT address modern slavery and human rights risks for children, migrant workers, third-party employees, and women.

This third-party supply chain data management solution has enhanced our due diligence process and supplier engagement by removing the need for suppliers to download/upload forms and reorganizing the survey data collection to be in-portal. This solution's human trafficking and slavery due diligence program actively identifies and manages supply chain risks through the data collection process, including analyzing supplier responses to determine risk levels in several categories. Our investment in this solution has helped us strengthen our ability to gather, store, and validate due diligence data, identify areas for improvement in the due diligence process, and improve communication with stakeholders.

Regarding mergers and acquisitions, the Company's standard due diligence process includes questions and document requests to assess whether the entity under consideration for acquisition, merger, or joint venture presents potential human rights impacts or risks.

With respect to the Company's commitment to taking steps to ensure that human trafficking and forced labor are not taking place in its business, these risks in the Company's own operations are low given its talent profile and recruiting practices. Additional information on recruiting and hiring practices is available on the [How We Hire section of our website](#) and in its most recent [Sustainability Report](#). Risks are identified and controlled through: (1) the [Code of Conduct](#); (2) the [Global Human Rights Policy](#); (3) the [Environmental, Health and Safety Policy](#); (4) annual anti-human trafficking training required for salaried employees in Procurement, Human Resources and Legal roles; and (5) the Company's hiring policies and procedures in place that are designed to ensure employees are legally eligible to work and provide any work eligibility paperwork as required by local legal requirements. Our [Global Human Rights Policy](#) and [Environmental, Health and Safety \(EHS\) Policy](#) are designed to protect human rights and workers in the value chain. The messaging outlined in these policies reflects the Company's global minimum business standards applied across its value chain, while complying with local laws and regulations. Additionally, the [Code of Conduct](#) and annual training instructs employees to report concerns or suspected misconduct, including concerns related to human trafficking or forced labor. The Company prohibits child labor and follows the legal work age limits in all jurisdictions where it operates. The Company fosters a workplace where all employees are valued and rewarded fairly across all compensation variables. And the Company's compensation practices are based on external norms, extensive data, internal equity, job scope, accountability and performance.

### **Supply Chain Modern Slavery Risk Mitigation**

The Company's risk mitigation process, at a high level, includes the ability to investigate potential issues at a supplier, provide training to a supplier, work with a supplier to implement mitigating controls, or otherwise assist a supplier in other appropriate manners with mitigating modern slavery risk. Our risk mitigation options also include termination of the supplier. Additional risk mitigation tools are outlined below.

### **Global Policies**

As an organization driven by our Leadership Principles, we uphold human rights in our operations and value chain. The Company's [Code of Conduct](#), which applies to all employees, prohibits human trafficking, including forced or child labor. The Code also requires employees to conduct due diligence (or support due diligence efforts), so the Company does not retain suppliers who engage in human trafficking.

In 2025, the Company refreshed its [Global Human Rights Policy](#) to further align with evolving industry trends and best practices. Our [Global Human Rights Policy](#) reiterates the Company's prohibition of the use of forced or child labor and states that the employment relationship must be

voluntary. This Policy outlines our commitments to human rights and describes the processes and legal requirements to which we strictly adhere. The Policy covers our expectations for our business partners and suppliers throughout our value chain. This Policy also reaffirms the Company's intolerance of human trafficking and includes enhanced requirements for recruiters and suppliers. Our Policy aligns with international requirements, including the [International Labor Organization's \(ILO\) Declaration on Fundamental Principles and Rights at Work](#) and the [United Nations Universal Declaration of Human Rights](#). The Policy includes our Modern Slavery and Human Trafficking Statement, guided by ILO Conventions 29 and 105, and outlines our steps to ensure compliance. We further address child labor with the guidance of ILO Convention 138.

### Training

In 2025, the Company's Global Human Rights Policy was communicated to employees through the Company's annual code of conduct training. This annual training included a course dedicated to anti-human trafficking. Salaried employees in high-risk roles, such as the Legal, Human Resources and Global Integrated Supply Chain (GISC) functions, are assigned courses based on function and associated risks. In 2025, 100% of global salaried team members in these functions completed anti-human trafficking training. Additionally, live or webinar-based modern slavery and human trafficking training is available for GISC employees and suppliers.

Anti-human trafficking / modern slavery training is available for suppliers through the third-party supply chain data management solution. Suppliers are encouraged to assess and review the educational materials during the annual modern slavery due diligence process described above. Company representatives and subject-matter experts from the third-party supply chain data management solution provider provided training to suppliers on modern slavery and how to comply with the Company's due diligence process.

### Reporting Mechanisms

The Company's Leadership Principle—we do what's right, always—and Code of Conduct asks employees to speak up and seek guidance or report concerns. The Company's [Ethics Helpline](#), which includes a reporting category for human trafficking and forced labor, is available to employees and outside third parties, including suppliers, for reporting concerns or alleged wrongdoing. The Ethics Helpline is available in over 150 languages by telephone and in 75 languages by webform. Reports to the Ethics Helpline are investigated and actions are taken to ensure compliance.

Employees and outside third parties may also report concerns using the Company's dedicated mailbox at [AntiHumanTrafficking@tranetechnologies.com](mailto:AntiHumanTrafficking@tranetechnologies.com). This mailbox is monitored regularly by a cross-functional team from Legal and GISC.

## Supplier Agreements

The Company defines its relationship with suppliers by contracts based on legal and ethical practices. The Company's contracts contain standard agreements that require suppliers to comply with the Company's [Business Partner Code of Conduct](#) and uphold fundamental human rights, including prohibitions on child, slave, prisoner and any other form of forced or involuntary labor. The Business Partner Code communicates the Company's expectations that suppliers operate ethically at all times. It also requires suppliers to ensure they do not violate basic human rights and prohibits forced labor and child labor. The Company will not continue to procure goods or services from a supplier found to be engaging in modern slavery or human trafficking.

## **Assessing the Effectiveness of the Company's Actions to Combat Modern Slavery**

The Company assesses the effectiveness of its actions to combat modern slavery by assessing employee awareness through training performance, analyzing reported modern slavery concerns, and working with suppliers engaged in our modern slavery due diligence process on how to implement or strengthen their policies and controls regarding modern slavery. We have taken actions with suppliers based on the results of our due diligence process. For example, suppliers receive, through our third-party supply chain data management solution, correction actions, such as implementing policies on human rights, child labor, the use of recruiters, and wages and benefits. We track supplier progress on the corrective actions.

## **Consultation Process**

The Company's global modern slavery and anti-human trafficking compliance program is managed by a cross-functional working group comprised of members of the Legal Department, including the Ethics & Compliance Group, and GISC.

## **Approval**

This joint Modern Slavery Report has been approved by the board of directors of each of the Trane Technologies Canadian Subsidiaries. Pursuant to resolutions adopted by the board of directors of each of the Trane Technologies Canadian Subsidiaries, the director named below is authorized to execute and deliver this Modern Slavery Report by and on behalf of the Trane Technologies Canadian Subsidiaries.

## **Attestation**

In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for the entity or entities listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the

report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.

*Guy HJ Bourbonniere*

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Guy Bourbonniere

Director of Trane Canada ULC, Trane Investments  
Canada Inc., Arctic Cool Chillers Limited and  
Brainbox AI Inc.

I have the authority to bind Trane Canada ULC,  
Trane Investments Canada Inc., Arctic Cool Chillers  
Limited and Brainbox AI Inc.

Attestation Date: May 26, 2026