



**Michael W. Lamach**  
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**BY E-MAIL AND FIRST CLASS MAIL**

Ambassador Mark D. Wallace  
United Against Nuclear Iran  
P.O. Box 1028  
New York, NY 10185-1028

***Re: Ingersoll Rand's Response to United Against Nuclear Iran***

Dear Mr. Ambassador:

Ingersoll-Rand plc is in receipt of your letters dated March 2, 2010 and March 4, 2010. Your organization obviously has a firm view point about a significant issue of concern in the global community – namely, whether commercial pressure can serve to prevent the current Iranian regime from gaining nuclear capability. Although you have raised a legitimate issue for discussion, we are deeply disappointed in some of your organization's tactics, which strike us as fundamentally unfair and calculated solely to pressure Ingersoll Rand in the public spotlight without regard to factual accuracy or even our input. First and foremost, you gave Ingersoll Rand no time at all to respond to your letter before turning the matter over to the media. Your letter dated March 2 was apparently issued a day before it was sent via facsimile to my attention on March 3. By the time I received the letter, it evidently had already been posted on your organization's website. Further, media outlets had already contacted our public relations representative to ask for Ingersoll Rand's position on March 2, and indeed some of these outlets published news articles on the morning of March 3, all before Ingersoll Rand ever saw the letter. It is also particularly distressing given my confidence that had you contacted the company first, we could have had a serious and productive discussion. Ingersoll Rand has a well-deserved reputation for integrity, and we take compliance and ethical issues extremely seriously.

Second, your accusation that Ingersoll Rand has run afoul of U.S. Securities and Exchange Commission disclosure rules, which you repeat in both your March 2 and March 4 letters, is completely unfounded and indeed disingenuous. In recent years, total revenues derived from the company's foreign subsidiaries have been immaterial in the context of the company's total world-wide revenues. Ingersoll Rand has no employees, operations, or assets in Iran.

INGERSOLL-RAND PUBLIC LIMITED COMPANY

REGISTERED OFFICE: 170/175 LAKEVIEW DRIVE, SWORDS, DUBLIN IRELAND

REGISTERED IN DUBLIN, IRELAND WITH LIMITED LIABILITY REGISTERED NUMBER: 469272

DIRECTORS: A.C. BERZIN (U.S.A.), J. BRUTON, J.L. COHON (U.S.A.), G.D. FORSEE (U.S.A.), P.C. GODSOE (Canada),  
E.E. HAGENLOCKER (U.S.A.), H.L. HENKEL (U.S.A.), C.J. HORNER (U.S.A.), M.W. LAMACH (U.S.A.),  
T.E. MARTIN (U.S.A.), P. NACHTIGAL (U.S.A.), O.R. SMITH (U.S.A.), R.J. SWIFT (U.S.A.), T.L. WHITE (U.S.A.)

Further, while you correctly note that Ingersoll Rand engaged in a written colloquy with the SEC's Office of Global Security Risk ("OGSR") between July 24, 2008 and November 19, 2008 regarding sales to Iran occasioned by questions from OGSR, you ignore the fact that in the final letter dated November 19, the Chief of the OGSR informed Ingersoll Rand that "[w]e have completed our review of this subject matter and have no further comments at this time." To be clear, Ingersoll Rand was not asked to revise its disclosures, let alone sanctioned by the SEC, which you chose to ignore, given your acknowledgement of correspondence dated November 19, 2008. The record reflects the fact that Ingersoll Rand's public disclosures have been entirely appropriate concerning Iran. Certainly, we will not accept your allegation to the contrary.

The facts are straightforward: Ingersoll Rand and its affiliates have complied with all applicable U.S. export control and economic sanctions laws and regulations. As even you tacitly seem to acknowledge, the Iranian Transactions Regulations permit non-U.S. subsidiaries to sell directly to customers in Iran under certain circumstances. All of Ingersoll Rand's sales to Iran have been conducted through non-U.S. subsidiaries, either directly or through independent dealers, and consist of products manufactured by non-U.S. subsidiaries and in full compliance with all applicable U.S. laws and regulations governing sales to Iran. Nonetheless, in light of very real and escalating concerns about the intentions of the current regime in Iran, many leading global companies around the world have opted to refrain from doing business with Iran. Ingersoll Rand now joins with those companies, and effective immediately will have its foreign subsidiaries stop accepting orders for all products, components and parts where the subsidiary knows such products, components or parts would be destined for Iran.

Sincerely,

A handwritten signature in blue ink, appearing to read "Michael W. Lamach".

Michael W. Lamach  
President and Chief Executive Officer