

Report of Organizational Actions Affecting Basis of Securities

▶ See separate instructions.

Part I Reporting Issuer

1 Issuer's name Ingersoll-Rand U.S. HoldCo, Inc.		2 Issuer's employer identification number (EIN) 84-3067702	
3 Name of contact for additional information Gary Geiken	4 Telephone No. of contact 414-212-4700	5 Email address of contact gary.geiken@gardnerdenver.com	
6 Number and street (or P.O. box if mail is not delivered to street address) of contact c/o Ingersoll Rand Inc., 800-A Beaty Street		7 City, town, or post office, state, and ZIP code of contact Davidson, North Carolina 28036	
8 Date of action February 29, 2019		9 Classification and description Common Stock	
10 CUSIP number	11 Serial number(s)	12 Ticker symbol	13 Account number(s)

Part II Organizational Action Attach additional statements if needed. See back of form for additional questions.

14 Describe the organizational action and, if applicable, the date of the action or the date against which shareholders' ownership is measured for the action ▶ **On February 29, 2020 Ingersoll-Rand U.S. HoldCo, Inc. ("IR US HoldCo") merged with a wholly owned subsidiary of the publicly traded entity Gardner Denver Holdings, Inc. (the "Merger"), and Gardner Denver Holdings, Inc. was renamed on March 2, 2020 as Ingersoll Rand Inc. ("New IR"). In the Merger, former shareholders of IR US HoldCo received shares in New IR.**

Shareholders should consult the Amendment No. 1 to the Form 10 filing of IR US HoldCo, filed with the Securities and Exchange Commission on January 15, 2020 for a complete discussion of the material U.S. federal income tax consequences of the Merger, as a result of which shareholders of IR US HoldCo will receive shares of common stock in New IR.

15 Describe the quantitative effect of the organizational action on the basis of the security in the hands of a U.S. taxpayer as an adjustment per share or as a percentage of old basis ▶ **On the basis that the Merger will qualify as a "reorganization" within the meaning of Section 368(a) of the U.S. Internal Revenue Code, the tax basis of the New IR common stock received by a holder of IR US HoldCo common stock in the Merger (including any fractional shares deemed received) will equal the tax basis of the IR US HoldCo common stock exchanged therefor.**

An IR US HoldCo shareholder who receives cash in lieu of a fractional share of New IR common stock will be treated as having received the fractional share pursuant to the Merger and then as having sold that fractional share for cash. As a result, the IR US HoldCo shareholder will recognize gain or loss equal to the difference between the amount of cash received and the tax basis in his or her fractional share.

16 Describe the calculation of the change in basis and the data that supports the calculation, such as the market values of securities and the valuation dates ▶ **N/A**

Part II Organizational Action (continued)

17 List the applicable Internal Revenue Code section(s) and subsection(s) upon which the tax treatment is based ▶ **Sections 354, 358, 368, and 1001.**

Blank lines for listing applicable Internal Revenue Code sections.

18 Can any resulting loss be recognized? ▶ **Generally, no gain or loss will be recognized for tax purposes as a result of the Merger. An IR US HoldCo shareholder who receives cash in lieu of a fractional share of New IR common stock will recognize gain or loss equal to the difference between the amount of cash received and the tax basis in his or her fractional share. The deductibility of capital losses is subject to limitations.**

Blank lines for providing information regarding loss recognition.

19 Provide any other information necessary to implement the adjustment, such as the reportable tax year ▶ **The Merger occurred on February 29, 2020. Consequently, the reportable tax year of the holders of IR US HoldCo common stock for reporting the tax consequences of the Merger is the taxable year that includes February 29, 2020.**

Blank lines for providing other necessary information.

Under penalties of perjury, I declare that I have examined this return, including accompanying schedules and statements, and to the best of my knowledge and belief, it is true, correct, and complete. Declaration of preparer (other than officer) is based on all information of which preparer has any knowledge.

Sign Here

Signature ▶ *Gary A. Geiken* Date ▶ *3-3-2020*

Print your name ▶ *GARY A. GEIKEN* Title ▶ *Asst Treasurer*

Paid Preparer Use Only

Print/Type preparer's name	Preparer's signature	Date	Check <input type="checkbox"/> if self-employed	PTIN
Firm's name ▶			Firm's EIN ▶	
Firm's address ▶			Phone no.	