

ECOLAB SUPPLIER CODE OF CONDUCT



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Purpose

The following describes Ecolab's expectations for its suppliers in the areas of integrity, ethical and legal standards, compliance, confidentiality, gifts, gratuities and business meals, labor rights and employment law, health and safety, environment, anti-bribery and corruption, fair competition and supplied materials (Supplier Code). While Ecolab recognizes that there are different legal and cultural environments in which suppliers operate throughout the world, this Supplier Code establishes a framework that Ecolab considers important to the management of manufacturing, distribution, and supply-chain operations. This includes minimizing adverse impacts to the environment, ensuring a healthy and safe workplace, maintaining fair and reasonable labor practices, and ethical sourcing of materials supplied to Ecolab.

Scope

This Supplier Code applies to the selection and retention of all suppliers that provide goods or services to Ecolab worldwide, including raw material suppliers, semi-finished or finished goods suppliers, packaging suppliers, contractors, contract manufacturers, service and transportation providers. Suppliers are expected to comply with this Supplier Code in the course of doing business with Ecolab and its employees.

Policy

Integrity, Ethical & Legal Standards

Ecolab is committed to upholding the highest legal and ethical standards at all times and in all places where we conduct business. Our [Code of Conduct](#) (Code) provides basic guidelines to assist us in making good decisions:

- on behalf of the Company,
- in doing our jobs ethically, and
- in compliance with policies and the laws of the countries where we do business.

Confidentiality

Information to which Ecolab employees may have access may be proprietary or confidential in nature. Ecolab places great value on its confidential and proprietary information. Equally, Ecolab employees are obligated to respect and protect the confidences of our Suppliers by not divulging their proprietary or confidential business information. Should confidential information desire to be shared, it is both Ecolab and the Supplier's responsibility to make sure the necessary confidentiality/non-disclosure agreements are in place and limit disclosure of proprietary information only to those who have a legitimate business need to know.

IT Security

Suppliers will maintain and enforce physical and information security procedures that meet or exceed industry standards. Except to the extent directly caused by Ecolab, they will be responsible for any and all security breaches and the reasonable costs of remediation. If a supplier discovers and is notified of a breach or potential breach of physical or information security, they will promptly notify Ecolab of such breach or potential breach and will promptly investigate and take all commercially reasonable steps to cure the breach.

Gifts, Gratuities & Business Meals

Ecolab does not allow improper influence, or even the appearance of improper influence, in our decision-making with Suppliers. Because of this, Ecolab Supply Chain employees cannot give to or receive from Suppliers, gifts or gratuities, no matter how small the dollar value.

Ecolab Supply Chain employees may only give to or receive from Suppliers customary business meals, provided the expenses involved are:

- kept at a reasonable level,
- include only those with a legitimate business reason for being present,
- are infrequent, and
- are not prohibited by law or known Supplier business practices.

Suppliers are expected to comply with these standards in the course of doing business with Ecolab Supply Chain employees. These requirements are set forth in the [Ecolab Gifts and Entertainment Policy](#) for Global Supply Chain, which is more restrictive than the Code.

Labor Rights & Employment Law

Ecolab is committed to respecting international human rights standards, as defined by the UN Guiding Principles on Business and Human Rights which include the UN Universal Declaration of Human Rights and the International Labor Organization (ILO) 1998 Declaration on Fundamental Principles and Rights at Work. Suppliers are expected to comply with all local country labor and employment laws and regulations, including those related to wages, hours worked, working conditions and child labor. Suppliers are expected to adopt sound labor and employment practices and to treat their workers fairly. Specifically:

- **Employment Practices** | Suppliers must hire and employ workers in compliance with applicable laws. Wages, benefits, and working hours are expected to be fair and reasonable in the local labor market.
- **Child Labor** | Suppliers must comply with the applicable local laws regarding the minimum hiring age for employees. If no such law exists or if the existing local law permits the hiring of employees younger than 18 years of age, the Supplier may not employ employees less than 18 years of age.
- **Forced Labor** | Ecolab expects Suppliers to not use labor that is a result of mental or physical coercion, physical punishment, involuntary, exploitative or other oppressive labor conditions. Suppliers and their employees are prohibited from engaging in any form of human trafficking.
- **Discrimination** | Suppliers must respect the right of every person to participate in all aspects of employment without regard to their personal characteristics or beliefs (for example, their race, color, religion, age, disability, marital status, veteran status, gender, gender identity, sexual orientation, ethnic or national origin). Suppliers' policies and practices should result in employment decisions being made on the basis of the workers' ability to do the job, and not on their personal characteristics or beliefs.
- **Freedom of Association** | Open communication and direct engagement with workers to resolve workplace and compensation issues is encouraged. Suppliers shall respect the rights of workers,

as set forth in local laws, to associate freely, join or not join labor unions, seek representation and join workers' councils. Workers shall be able to communicate openly with management regarding working conditions without threat of reprisal, intimidation or harassment.

Ecolab also has a [Global Anti-Human Trafficking Policy](#). This Policy is our approach to combatting human trafficking and documents how Ecolab complies with the requirements of US Federal Acquisition Regulation ("FAR") Subpart 22.17. This policy is part of our core values to protect and advance human dignity and human rights in our global business practices.

Health & Safety

Suppliers shall comply with all applicable health and safety laws and regulations by providing a safe and healthy working environment. The health and safety elements include:

- **Identifying Risk and Process Safety** | Suppliers shall identify both occupational and external hazards and have programs in place, appropriate to the risks, to actively prevent or mitigate these risks (e.g., catastrophic releases of chemicals, fumes, dust, etc.).
- **Worker Protection** | Suppliers shall protect workers from exposure to chemical, biological and physical hazards and physically demanding tasks in the workplace, including in any company-provided living quarters.
- **Emergency Preparedness and Response** | Suppliers shall identify and assess emergency plans across the entire facility and any company-provided living quarters and minimize the impact of any emergency by implementing suitable emergency plans and response procedures.
- **Hazard Information** | Suppliers shall provide safety information relating to hazardous materials (including raw materials), isolated intermediates, products, solvents, cleaning agents, and wastes to educate workers and train and protect workers from potential hazards.

Environment

Suppliers shall operate in an environmentally responsible and efficient manner and minimize adverse impacts on the environment. Suppliers are encouraged to conserve natural resources, avoid the use of hazardous materials where possible, and engage in activities that reuse and recycle. The environmental elements include:

- **Environmental Authorizations** | Suppliers shall comply with all applicable environmental laws and regulations. All required environmental permits, licenses, information registrations and restrictions shall be obtained, be active and their operational and reporting requirements followed.
- **Waste and Emissions** | Suppliers shall have systems in place to ensure the safe handling, movement, storage, recycling, reuse, or management of waste. Any generation and disposal of waste, emissions to air and discharges to water with the potential to adversely impact human health or the environment shall be appropriately minimized, and properly managed, controlled or treated prior to release into the environment.
- **Spills and Releases** | Suppliers shall have systems in place to prevent and mitigate accidental spills and releases to the environment.

- **Sustainability and Efficiency of Resources** | Suppliers shall have systems in place to optimize the use of all relevant resources sustainably, such as energy, water, and materials. Suppliers shall set clear environmental performance targets and look for ways to continuously improve your performance in collaboration with internal and external stakeholders. A Supplier must disclose information regarding carbon/greenhouse gas and water reduction commitments and provide any requested information on which impacts Ecolab's greenhouse gas emissions reporting and/or other information consistent with industry standard greenhouse gas emissions reporting.

Anti-Bribery and Corruption

The [Ecolab Anti-Corruption Policy](#) reinforces the commitment to ensure compliance with all anti-corruption laws, including the US Foreign Corrupt Practices Act ("FCPA"), the UK Bribery Act 2010 and anticorruption laws in effect within the countries where Ecolab does business.

All corruption, extortion and embezzlement are prohibited. Suppliers shall comply with all applicable laws, regulations and industry standards related to anti-corruption. Suppliers shall not pay or accept bribes or participate in other illegal inducements in business or government relationships or make any other inducement (including facilitation payments, gifts and hospitality, grants or donations) in relation to their business with Ecolab.

Fair Competition

Ecolab has an open and fair entry process that allows potential suppliers, regardless of nationality, size, and experience, the same chance to offer us their products or services. We select our business partners based on economic reasons such as the quality, price, volume, capacity, and lead times. In addition, we also consider comprehensively things like safety, environmental awareness, company stability, and innovation/development ability.

Ecolab believes in free competition and fair business practices. We do not allow business practices that seek unfair advantages or misrepresent facts about our business or products. Additionally, we do not allow false or misleading statements about our competitors or their products. Likewise, Suppliers shall follow the laws that preserve a fair and competitive marketplace, such as anti-trust laws. Suppliers shall employ fair business practices, including accurate and truthful advertising.

Supplier Diversity

Ecolab values building a more equitable marketplace by including minority and women-owned businesses, small businesses, and businesses owned by people from traditionally under-represented groups, depending on geography, into our sourcing practices.

We expect our Suppliers to share in our vision, and that our Suppliers work towards starting, maintaining, or growing programs that include under-represented business communities, and report those outcomes to Ecolab when appropriate.

Supplied Materials

- **Conflict Minerals** | Suppliers are expected to be in compliance with the [Ecolab Conflict Minerals Policy](#). If materials supplied to Ecolab contain any tantalum, tin, tungsten or gold that are necessary to the production or functionality of such products under Section 1502 of the U.S. Dodd-Frank Act and its implementing regulations, a Supplier must disclose the presence of these

minerals and provide any requested information on the smelters and refiners in the relevant supply chains of these minerals and/or other information consistent with industry standard conflict minerals reporting.

- **Paper Procurement** | Ecolab is aligned with the efforts of global organizations to responsibly manage paper and wood products to minimize environmental impacts across their entire life cycle. We expect our Suppliers to share in our commitment to increase the sustainability of paper products that we purchase. Ecolab expects Suppliers to provide paper and wood products where the raw material source (e.g., wood) is not: illegally harvested; harvested in violation of traditional, indigenous and civil rights; harvested in forests where high conservation values (e.g., old growth, endangered forests) are threatened; harvested in forests being converted to plantations or non-forest use; or harvested from plantations using genetically modified trees.

Explanation of Key Terms

Suppliers | Any person or entity that provides goods or services to Ecolab worldwide, including raw material suppliers, semi-finished or finished goods suppliers, packaging suppliers, contractors, contract manufacturers, and service providers.

Responsibility

Suppliers are expected to comply with this Supplier Code in the course of doing business with Ecolab and its employees.

Compliance

Suppliers to Ecolab must comply with all applicable laws, codes and regulations of the countries, states and localities in which they operate. Additionally, they must comply with all standards contained in this Supplier Code and, as applicable, Ecolab's Code of Conduct. Suppliers will maintain compliance systems and be able to demonstrate a satisfactory record of compliance with laws, regulations and this Supplier Code in the conduct of their business.

Reporting

If, at any time, this Supplier Code is perceived as being compromised in any way, please report your good faith concern to Ecolab's Code of Conduct Helpline – phone numbers by country are available through [Ecolab's Code of Conduct](#). You may also report through the [web reporting portal](#). Concerns will be addressed promptly with care, respect, and confidentiality to the fullest extent possible.

References

- [Ecolab Code of Conduct](#)
- [Ecolab Conflict Minerals Policy](#)
- [Ecolab Privacy Policy](#)
- [Ecolab Global Anti-Human Trafficking Policy](#)
- [Ecolab Gifts and Entertainment Policy for Global Supply Chain](#)
- [Ecolab Anti-Corruption Policy](#)

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Initial Release	02/24/2015	Global Supplier Code of Conduct	Global Procurement
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