

A woman wearing a white hard hat with the 'ECOLAB' logo, safety glasses, and a white button-down shirt is holding a black tablet. She is standing in a factory or industrial setting with large machinery in the background. The lighting is bright and focused on her.

**ECOLAB<sup>®</sup>**

**ETHICAL ANSWERS:  
THE ECOLAB CODE  
OF CONDUCT**



We believe that a diverse, inclusive and purpose-driven team is critical to the success of our individual associates, company, customers and communities.

## Why Our Code Matters: A Message from Chairman and CEO Christophe Beck

### Dear Colleagues:

At Ecolab, we believe that a diverse, inclusive and purpose-driven team is critical to the success of our individual associates, company, customers and communities. For a century, we've grown the business by working together with diverse perspectives, doing what's right, what's fair and what's honest. To reach our goals and pursue our purpose of protecting people and resources vital to life, we must act ethically in every interaction, every single day.

It is in this context that I'm pleased to share the Ecolab Code of Conduct with you. In it, we discuss our values, beliefs and the expectations of all of us at Ecolab. It's my hope that you'll read this document and use it as a guide in your daily interactions with each other and our customers. If you see someone acting unethically, please use the resources in this document to report it.

We would not be the company we are today without our incredible people. We are One Ecolab. One family. And together with our customers we are making the world cleaner, safer and healthier. I look forward to building on our legacy of doing great things for humanity in the right way, always.

Sincerely,  
**Christophe Beck**  
Chairman, President and  
Chief Executive Officer

# Our Values

## WE REACH OUR GOALS

We deliver results for our customers, our shareholders and each other.



## WE DO WHAT'S RIGHT

We're honest, reliable and genuine in our actions. We act with integrity.



## WE CHALLENGE OURSELVES

We go beyond the status quo, learn and grow, and innovate to improve processes and deliver better outcomes.

## WE MAKE A DIFFERENCE

We make a positive impact on people around us, our community and our world. We inspire others to make a positive difference too.



## WE WORK TOGETHER WITH DIVERSE PERSPECTIVES

We work together for the good of the team and the Company – across functions and geographies. We share knowledge and support each other.



## WE DO ALL THIS WITH CARE, PUTTING SAFETY FIRST

The daily actions of all Ecolab associates ultimately define who we are as a company.

# Contents

**WHY OUR CODE MATTERS:  
A MESSAGE FROM CHAIRMAN  
AND CEO CHRISTOPHE BECK** i

**OUR VALUES** ii

**1 OUR CODE AND OUR ROLE** 1

We Uphold Our Code 2  
 We Ask Questions and Report Concerns 3  
 We Support Investigations 4

**2 HOW WE WORK WITH EACH OTHER** 5

We Treat Each Other with Respect 6  
 We Promote Equal Employment, Diversity, Equity and Inclusion 7  
 We Maintain Workplace Safety 8  
 We Keep Data Private 9  
 We Support Human Rights 10

**3 HOW WE WORK WITH OUR BUSINESS PARTNERS AND CUSTOMERS** 11

We Promote Product Quality and Safety 12  
 We Protect Business Partner Privacy 13  
 We Work Ethically with the U.S. Government 14  
 We Maintain Honest Marketing Practices 15

**4 HOW WE WORK WITH OUR COMMUNITIES** 16

We Promote Community Involvement and Corporate Social Responsibility 17  
 We Do Not Participate in Bribery and Corruption 18  
 We Support Fair Competition 20  
 We Follow Business-Across-Borders Requirements 21  
 We Protect the Environment 22  
 We Engage in Political Activities Responsibly 23

**5 HOW WE WORK FOR ECOLAB** 24

We Avoid Conflicts of Interest 25  
 We Exchange Gifts, Hospitality and Entertainment Ethically 27  
 We Protect Confidential Information 29  
 We Manage Our Business Partners Responsibly 30  
 We Secure Our Data 31  
 We Protect Ecolab Assets 32  
 We Do Not Engage in Insider Trading 33  
 We Keep Accurate Records 34  
 We Communicate Appropriately 36

# 1 Our Code and Our Role



# We Uphold Our Code

Everyone at Ecolab follows our Code, our policies and applicable laws.

## HOW DO WE FOLLOW OUR CODE?

- We follow our Code and understand that it applies to all Ecolab employees, officers and directors; all employees of majority-owned subsidiaries and joint ventures; and all of our agents, contractors and consultants.
- We follow all applicable laws, and when applicable law is stricter than our Code, we follow the stricter rule.
- We understand that violations of our Code, our policies or any applicable law or regulation can result in disciplinary action up to and including termination of employment.

Managers understand and enforce our Code, make sure their direct reports understand their responsibilities and answer employee questions. Managers are required to properly escalate concerns to Human Resources, to the [Global Compliance & Ethics department](#) or to the [Code of Conduct Helpline](#).

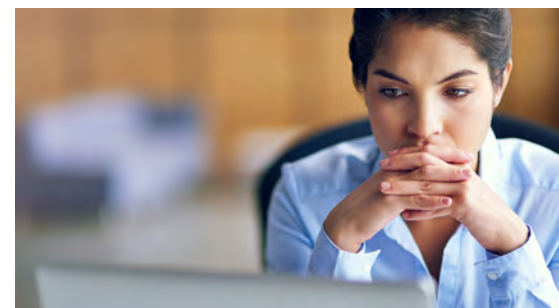
Waiver of our Code is made only in rare cases by the Board of Directors or a committee of the Board of Directors.

Ecolab periodically reviews our Code, as well as related company policies, and makes modifications as required or deemed necessary.

## WHAT ROLE DO WE PLAY IN UPHOLDING OUR CODE?

We make sure we all follow our Code, our policies and any applicable laws and regulations. We learn the rules that apply to our role, and we are ready to speak up if we have any questions or concerns.

Our managers at Ecolab have additional responsibilities to model ethical behavior, supervise their direct reports and be a point of contact for questions and concerns.



**When making decisions and taking action, we always ask ourselves:**

- Does my action follow our Code, our policies and the applicable law?
- Would I want my action to be publicly known?
- Does my action reflect Ecolab's values, and is it the right thing to do?

If you cannot answer “yes” to all of these questions, then you should reconsider your action and consult with your manager or the Global Compliance & Ethics department before you continue.



## NON-RETALIATION

Ecolab does not tolerate retaliation against employees who ask questions, report their concerns or cooperate with investigations. If you are aware of any retaliation, you should contact your manager, the Global Compliance & Ethics department or our Code of Conduct Helpline immediately.

Please see our [Reporting and Investigations Policy](#) for further details.

# We Ask Questions and Report Concerns

We speak up at Ecolab. If we notice any conduct that we feel potentially violates our policies or our Code, we are required to report it promptly and in good faith; or if we are not sure about something, we seek help. Reporting concerns and asking questions is our responsibility and the best way we can continue to do business the right way.

We have an obligation to report a potential violation of our Code.

At Ecolab you have several options for getting support and reporting concerns.

- Your manager
- Human Resources
- [Law department](#)
- [Global Compliance & Ethics department](#)
- [General Counsel](#)
- Our Code of Conduct Helpline: the Helpline number for the United States, Canada and Puerto Rico is 800-299-9442; for other countries see [here](#)
- You may also submit an online Code of Conduct Helpline report on our publicly available submission [form](#).



Reports can be made anonymously on our Code of Conduct Helpline in most jurisdictions and situations. Whether you are allowed to report potential Code of Conduct violations anonymously depends on the laws in your location. Some countries limit or forbid reporting certain concerns without identifying yourself.

If you are an employee in the European Union, and you make a report on the Code of Conduct Helpline, the following guidelines apply:

- You will be asked to allow your name to be used in the report.
- You should name an employee suspected of wrongdoing only if it is necessary.
- We will use the information you provide solely to investigate your specific report and not for any other purpose.
- We will not disclose to the named employee who made the report.

# We Support Investigations

Ecolab takes reports of misconduct and violations of our Code and our policies seriously.

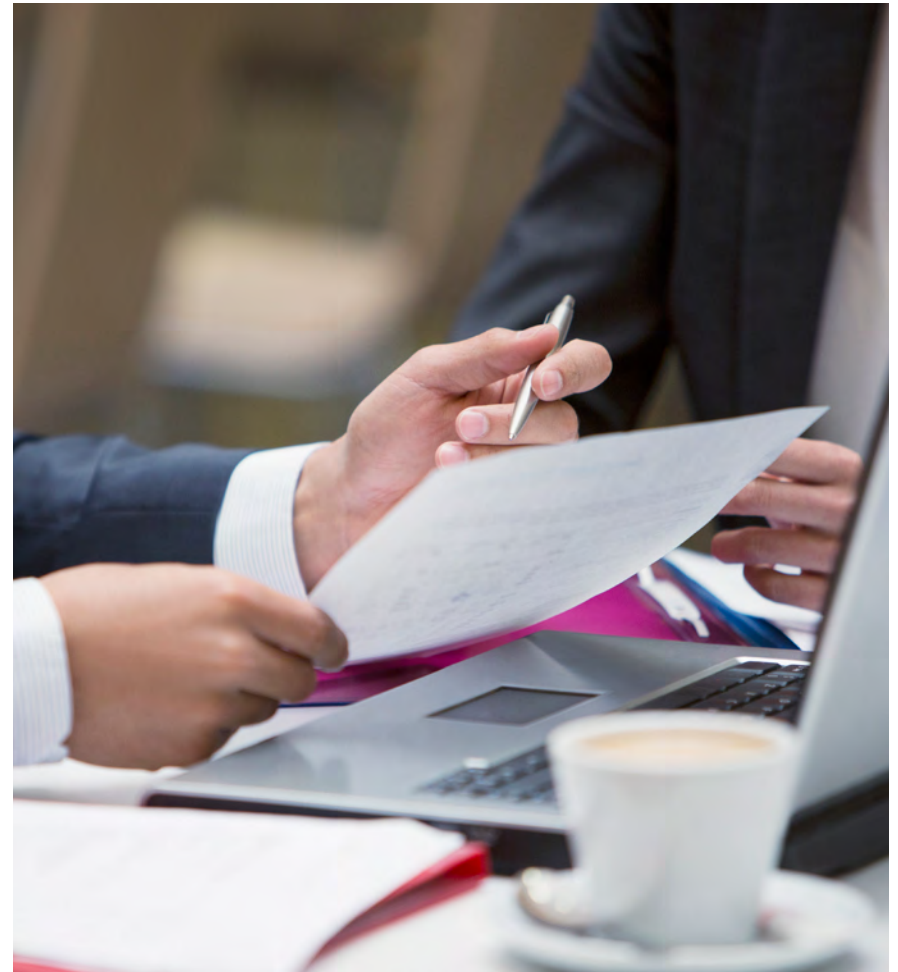
## HOW DOES ECOLAB CONDUCT INVESTIGATIONS?

- After an allegation is made, the Chief Compliance Officer, or named designee, will assign an internal investigator who will complete the investigation in a thorough and timely manner. In some cases, an external investigator may be assigned.
- The lead investigator will make recommendations that can include taking no action, providing coaching or training, proposing some form of disciplinary action up to and including termination of employment, and further action if deemed appropriate.
- The Global Compliance & Ethics department will notify the reporter once the investigation is complete.
- We expect employees to keep investigations confidential and not discuss the matter with coworkers.

Please see our [Reporting and Investigations Policy](#) for further details.

## WHAT DOES ECOLAB DO WHEN A REPORT IS MADE?

Ecolab promptly responds to reports and seeks to keep the report confidential to the greatest extent possible. In return, we expect employees to help protect the confidentiality of the report and the investigation by not discussing the matter with coworkers.







# 2 How We Work with Each Other

# We Treat Each Other with Respect

Ecolab does not tolerate any form of harassment or bullying. We always treat each other with respect. This includes interactions with our coworkers and others we work with, including vendors, suppliers and customers.

## HOW DO WE TREAT EACH OTHER WITH RESPECT?

- We treat each other with respect, and we consider the ways that our behavior and speech may affect our fellow employees and our team.
- We speak up and contact Human Resources or any of the available reporting options when we have questions or concerns about potentially harassing behavior.
- We do not engage in any harassing behavior, such as:
  - Verbal harassment – bullying or making derogatory comments, slurs or inappropriate jokes or remarks;
  - Physical harassment – engaging in assault or other physically intimidating actions;
  - Visual harassment – displaying or sending offensive cartoons, drawings, photos or other printed or electronic materials; or
  - Sexual harassment – making unwelcome physical or verbal advances or requests for sexual favors or engaging in other inappropriate sexual conduct.

We never make submission to harassing behavior a condition of employment or a factor in employment decisions.

## WHAT IS HARASSMENT?

Harassment is any form of inappropriate conduct that could create an intimidating, hostile or offensive work environment that negatively impacts an employee's work performance.

Bullying might include examples of public shaming, such as berating someone, inappropriately raising one's voice or repeatedly criticizing someone in group settings.

### QUESTION

My manager frequently yells at one of my coworkers and calls him names. I am not certain, but my coworker does seem to be uncomfortable. Should I just let my coworker take care of this situation?

### ANSWER

No. You are required to report any conduct that you believe could be a violation of our Code. Bullying is harassing behavior and must be reported using the many reporting options available to you.





## We Promote Equal Employment, Diversity, Equity and Inclusion

Ecolab works to maintain a diverse, inclusive and equitable work environment where we respectfully work as a team.

### HOW DO WE PROMOTE EQUAL EMPLOYMENT, DIVERSITY, EQUITY AND INCLUSION?

- We do not discriminate based on personal characteristics or conditions protected by national, state or local law such as gender, race, ethnic origin, nationality, sexual orientation, gender identity, religion, age, disability, marital status or veteran status.
- We make employment decisions based on an individual's qualifications and their ability to perform their job.
- We seek to have different perspectives on our team, and we promote an inclusive and respectful workplace.
- We speak up and contact our manager or use any of the available reporting options when we have questions or concerns.

Because laws and regulations differ among locations in which Ecolab operates, we should consult with our manager, Human Resources or the Global Compliance & Ethics department if we have questions. If we have a concern to share, we should use the reporting options available.

### WHAT IS DIVERSITY, EQUITY AND INCLUSION?

We celebrate our diversity – the different perspectives, backgrounds, cultural, physical and social differences that make each of us unique. We champion inclusion by valuing and purposely integrating all our employees' diverse perspectives and contributions into the fabric of Ecolab. We promote the equitable treatment of every associate by ensuring that each of them has access to what they need to grow and thrive.

# We Maintain Workplace Safety

Ecolab puts safety first. We maintain a healthy and safe environment for all employees.

## HOW DO WE MAINTAIN A SAFE WORKPLACE?

- We follow Ecolab's health and safety policies, practices and procedures and all applicable health and safety rules, regulations and laws.
- We carefully observe and report any unsafe or unhealthy conditions to our managers and empower employees to stop work when conditions or behaviors are unsafe.
- We do not tolerate any bullying, harassment, intimidation or threats of violence.
- We immediately report threats or violence to our manager or the appropriate emergency authorities, if necessary. Concerns may also be reported using all reporting options.
- We do not possess weapons (e.g., firearms, knives) while performing services on behalf of Ecolab or while on Ecolab's property, in Ecolab vehicles or while conducting Ecolab business, subject to local law.
- We do not manufacture, sell, distribute, possess or use any controlled substances that may affect behavior while working on Ecolab property, while driving or riding in Ecolab vehicles or while conducting Ecolab business.
- We do not perform our jobs, including driving while on business, impaired by the use of any drug, nor do we consume alcohol while conducting Ecolab business unless at an approved and sanctioned social event.
- We report any employee that we suspect may be under the influence of alcohol or a controlled substance that affects behavior.

## WHAT IS A SAFE WORKPLACE?

We believe a safe workplace environment is one where the health and safety of all employees is maintained, and health and safety risks are identified and addressed.



### QUESTION

My coworker regularly fails to wear safety glasses as required to shield her eyes when we are working inside the plant. When I mentioned it to her, she said that the safety glasses fog up and actually make her less safe. Since I've already brought it up with her, is there really anything else I can do?

### ANSWER

Yes. If your coworker refuses to wear required personal protection equipment, you must report the issue using the many reporting options available to you.





## We Keep Data Private

Ecolab respects and protects employee personal information.

### HOW DO WE PROTECT THE PRIVACY OF PERSONAL INFORMATION?

- We protect the personal information of our employees and the personnel of our customers, suppliers and business partners with the utmost care in a manner consistent with our policies and procedures and with all applicable laws.
- We make sure we are aware of all applicable Ecolab policies and procedures that apply to the collection, access, use, transfer, storage and disposal of the personal information for which we are responsible.
- We transfer or share personal information only with those who need to know it or are specifically authorized to have access to it.
- We use personal information only for necessary [business purposes](#), and we retain personal information only for as long as it is needed for those specific business purposes.
- Ecolab acknowledges that many countries in which we operate have specific data privacy laws, and we are committed to complying with these laws.
- We report concerns, including a possible privacy breach, using the reporting options.

Please see our [Ecolab Privacy Policy](#) for further details.

### WHAT IS PERSONAL INFORMATION?

Personal information, or personal data, is identifying information of an individual such as your name, date of birth, address, telephone number and email; your financial and health information; and other personal information such as your hobbies, areas of interest and professional affiliations.

# We Support Human Rights

Ecolab is dedicated to supporting and promoting human rights throughout our operations and around the world.

## HOW DO WE SUPPORT HUMAN RIGHTS?

- We comply with all applicable laws regarding human trafficking, forced labor, slavery and child labor.
- We do not work with partners, suppliers, recruiters or other third parties that engage in any sort of human trafficking, forced labor, slavery or child labor.
- We expect our partners and third parties to maintain a safe, healthy and secure work environment.
- We do not misrepresent the key terms and conditions of employment, including wages and fringe benefits, the location of work, the living conditions, or housing and associated costs, nor do we work with third parties who make such misrepresentations.
- We report any concerns regarding potential human rights violations using the reporting options available.

Please see our [Global Human Rights Policy](#) for further details.

## WHAT ARE HUMAN RIGHTS?

Human rights are fundamental, universal rights we all possess and that apply worldwide at all times.





# 3

## How We Work with Our Business Partners and Customers

# We Promote Product Quality and Safety

Ecolab's reputation is based on the quality of our products and services. We pride ourselves on continually maintaining the highest standards and on meeting and exceeding our customers' expectations.

## HOW DO WE MAINTAIN PRODUCT QUALITY AND SAFETY?

- We focus on quality and safety through all stages of product development, including design, manufacturing, testing, inspection, storage, transportation, customer use, disposal and recycle or reuse.
- We manage product safety by identifying, assessing and communicating to relevant managers about the potential risks and hazards of our ingredients, processes and products.
- We take no action that could jeopardize the quality and safety of our products.
- We speak up and raise any questions or concerns we have regarding the quality or safety of our products using the reporting options available.

Please see our [Global Quality Policy](#) and [Product Safety and Stewardship Position](#) for further details.

## WHAT DO WE MEAN WHEN WE SAY WE PROMOTE PRODUCT QUALITY AND SAFETY?

We promote quality and safety by maintaining a high standard of quality for Ecolab products and services, and we follow all our internal processes and procedures as well as all applicable rules, regulations and laws that apply to our products and services.







## We Protect Business Partner Privacy

Ecolab's business partners, including our customers and suppliers, trust us with their business and with their data. We protect that data.

### HOW DO WE PROTECT BUSINESS PARTNER PRIVACY?

- We share business partner confidential information only with others that have a business need to know it and, in the case of third parties, only those that have agreed in writing to abide by our policies, our procedures and any applicable laws.
- We collect, store, access, use or transfer business partner information only to the limited extent we need to for a specific business purpose.
- We follow all our procedures and policies and all applicable laws regarding the collection, storage, access, use, transfer and destruction of any business partner confidential information.
- We carefully protect and do not share any confidential information that belongs to our business partners.
- We [seek assistance](#) using the reporting options available if we have any questions about the use and handling of business partner information or if we believe there may have been a breach of any confidential information belonging to a business partner.

Please see our [Global Information Security Policy](#) for further details.

### WHAT DOES PROTECTING BUSINESS PARTNER PRIVACY MEAN?

We protect confidential information and data that is provided to us by our business partners. This can include both personal information and proprietary data.

# We Work Ethically with the U.S. Government

Ecolab proudly supports its U.S. government customers and adheres to applicable regulations, laws and contractual requirements and terms.

## HOW DO WE WORK AS A U.S. GOVERNMENT CONTRACTOR?

- We must understand and follow all contracting requirements and regulations when working with government customers.
- We submit information such as pricing to government customers completely and accurately, and any changes are reported immediately and thoroughly.
- We always ensure all products, materials and processes we use conform to the specifications in our contracts with the government, and if we intend to make changes to any requirements, we get written approval from an authorized government official before we make the change.
- We do not discuss with or offer any sort of employment or consulting opportunities to current or former government employees without receiving clearance from Human Resources and the Global Compliance & Ethics department.
- We do not provide anything of value to a U.S. government employee or contractor or to their immediate family members except that a modest refreshment like a soft drink or coffee may be given on an infrequent basis in connection with business meetings.
- We do not offer, provide, solicit or accept anything of value from anyone in return for favorable consideration on a U.S. government contract or subcontract.
- We do not seek or solicit source selection or bid or proposal information prior to the award of any government contract, and if we receive any such information, or any other confidential or proprietary information, we report it to the Law department.
- We cooperate with any investigations or audits by the government and never conceal, destroy or alter any information related to any investigation or audit.
- We report any instances of possible fraud, overpayment regarding our government contracts or any other behavior that violates our Code, our policies or applicable law immediately to the Global Compliance & Ethics department or the Code of Conduct Helpline.
- We review our [Federal Government Contracts Policies and Procedures Manual](#) regularly and contact those that work in Government Sales or the Law department if we have any questions about government contracting or the requirements we must follow.

Please see our [Federal Government Contract Policies and Procedures Manual](#) for further details.

## WHAT IS A U.S. GOVERNMENT CUSTOMER?

Ecolab is a supplier to the United States government, which requires us to follow certain applicable laws, regulations and procedures and to meet strict government contracting requirements. Most of our U.S. government customers are military bases, federal facilities and buildings, and federal prisons. Some of our customers, such as airports and museums, may also be considered U.S. government customers.



## We Maintain Honest Marketing Practices

Ecolab tells the truth about our products and services in our marketing and advertising materials.

### HOW DO WE MARKET HONESTLY?

- We do not exaggerate or make misstatements about the characteristics and uses of our products and services.
- We make sure that all marketing claims are true, not misleading, substantiated with supporting documentation and compliant with applicable laws and regulations.
- We submit any comparative claims in marketing or advertising to the Law department for review before release.
- We submit any marketing or advertising claims regarding regulated products to the Regulatory Affairs department for review before release.
- We do not disparage or make any false or misleading claims about our competitors' products or services.

Please see our [Global Comparative Claims Policy](#) for further details.

### WHAT DOES HONEST MARKETING MEAN?

Honest marketing means we take care that claims we make about our products and services are fair, accurate and complete.



# 4 How We Work with Our Communities



### QUESTION

A community in which we operate was just hit by a major storm that knocked out power and put many families out of their homes. A local charity has been asking for items for the victims, including hand sanitizer. We have several boxes of our hand sanitizer in stock at our facility. Can I provide those items to the charity right away?

### ANSWER

No. While we do donate products under certain circumstances, we have a specific procedure in place to make sure such donations are handled properly. You must first review the process in our [Global Donations Policy](#) and make sure all steps and approvals are followed.

## We Promote Community Involvement and Corporate Social Responsibility

Ecolab supports the communities where we operate and where we serve.

### HOW DO WE PROMOTE COMMUNITY INVOLVEMENT AND CORPORATE SOCIAL RESPONSIBILITY?

- We promote the wellbeing of our employees, customers and others by contributing to programs and initiatives that enhance the quality of life in their communities.
- We believe that supporting our communities benefits their economic and social vitality in general, while making them better for all people.
- We report concerns using the reporting options available.

Please see our [Community Impact Position](#) and [Global Donations Policy](#) for further details.

### WHAT IS CORPORATE SOCIAL RESPONSIBILITY?

Corporate social responsibility is when organizations take action to promote positive impacts in the communities where they operate and serve.

# We Do Not Participate in Bribery and Corruption

Ecolab conducts business ethically and does not pay or accept any bribes either directly or indirectly, nor do we engage in corrupt activities to gain or retain any business, or business opportunities.

## HOW DO WE AVOID BRIBERY AND CORRUPTION?

- We do not provide anything of value with the intent to improperly influence any government official, including employees of government agencies or government-controlled or -owned businesses, members of royal families, political parties, political candidates or anyone else who has the ability to influence a government's decisions.
- We do not offer anything of value to any current or potential customer, supplier or any third party to improperly influence any business decision-making or to gain or retain any business.
- We do not accept anything of value from any current or potential customer, supplier or third party to improperly influence our business decision-making or provide any improper business award.
- We do not pay "facilitation payments" or payments of any size directly to government officials to expedite routine government actions, such as providing a visa or work permit, except when personal safety is compromised. However, this must be immediately reported to the Global Compliance & Ethics department.
- We understand that the laws of many countries, including the United States, prohibit and punish bribery and corruption. Violating our policy or any applicable laws can result in significant disciplinary action and serious criminal and civil penalties for both Ecolab and violating employees.



## WHAT IS A BRIBE?

A bribe can be anything of value given or accepted to influence a business decision. It can be cash, gift cards, gifts, entertainment, meals, travel, a job opportunities, discounts, forgiveness of a debt, donations or personal favors.



We do not allow anyone working on our behalf, such as agents, representatives, distributors or any other third-party intermediaries, to bribe government officials or other third parties, and we strictly follow our [Global Anti-Corruption Policy and Procedures](#) when working with third parties who will represent us with government officials or other business partners.

- We strictly follow our [Global Anti-Corruption Policy and Procedures](#), even where local law or custom may appear to permit less stringent requirements, and even if business may be lost as a result of following this policy and its related procedures.
- We keep accurate books and records that honestly reflect our business activities, and we require any representative or third party working for Ecolab to also keep accurate books and records of the business activities they conduct on our behalf.
- We report concerns to the [Global Compliance & Ethics department](#) or the [Code of Conduct Helpline](#).

Please see our [Global Anti-Corruption Policy and Procedures](#) for further details.

#### QUESTION

I am discussing potential opportunities with an overseas agent we have never worked with before. He says he can secure business with a local government agency if we engage him, but we have to work fast, and he seems uninterested in providing financial and other details about his business. Should I be concerned?

#### ANSWER

Yes. When a third party is not forthcoming about their financial information or is not interested in cooperating with our onboarding and due diligence processes, that is a red flag. If you have questions about working with third parties, please contact the Global Compliance & Ethics department.

# We Support Fair Competition

Ecolab supports a fair marketplace where we compete based on the quality of our products and services and not based on unlawful agreements with competitors or unauthorized access to competitors' information.

## HOW DO WE SUPPORT FAIR COMPETITION?

- We are careful to avoid any conversations with competitors about pricing (including lowering pricing), customers, markets, bidding, production limits, reciprocal dealing and product development, or any other discussions about coordinating our businesses.
- We contact the Global Compliance & Ethics department immediately if we find ourselves in situations where such conversations with competitors have occurred (such as at trade association events).
- We neither engage in reciprocal sales nor agree to purchase products or services in exchange for the other party agreeing to purchase from Ecolab.
- We do not gather competitive information through unethical or illegal means, such as espionage, burglary, theft, wiretapping or accessing competitor data or email, or interviewing or hiring a competitor's employees in order to discover confidential or proprietary information.
- We understand that the laws of many countries, including the United States, impose harsh criminal penalties on individuals who violate anti-trust or competition laws. Anti-trust or competition law violations also can result in substantial fines for both Ecolab and violating employees.
- We contact the Global Compliance & Ethics department before we discuss employment with or hire former or current employees of our competitors, or if we have any questions about contact with a competitor or the gathering of competitive information.

Please see our [Anti-Trust Policy](#) for further details.

## WHAT IS COMPETITIVE INFORMATION?

Competitive information is information about competitors that can help us evaluate their products, services and marketing methods. Ecolab gathers competitive information lawfully.

## QUESTION

I am working with a consultant who formerly had a contract with our competitor in a market into which we are trying to expand. She has a list of potential customers she developed during her work with our competitor that she would like to share with me. Is receiving this list okay since she is not an employee of our competitor?

## ANSWER

You should contact the Global Compliance & Ethics department and explain the situation before you agree to accept any competitor information. The customer list could belong to our competitor, which means receiving it from the consultant might violate our policies and perhaps violate the law.







## WHAT TRADE CONTROLS MUST WE OBSERVE?

We follow export compliance rules that control what and how we export, trade sanctions that restrict with whom we can trade, import compliance rules that regulate imported goods, and anti-boycott laws that forbid compliance with unsanctioned foreign boycotts.

# We Follow Business-Across-Borders Requirements

Ecolab complies with all applicable trade and sanctions laws and regulations.

## HOW DO WE CONDUCT BUSINESS ACROSS BORDERS?

- We comply with all applicable export laws and regulations, including all requirements for documentation, authorization and licensing requirements, and all restrictions for the export and re-export of certain commodities, technology and software.
- We learn the export regulations that restrict what is being exported, where it is being exported and to whom it is being exported, as well as the appropriate approvals and licensing for export, and we seek assistance from the Regulatory Affairs department or the Global Compliance & Ethics department if we have any questions about these requirements.
- We understand that “deemed exports” to foreign nationals can occur even within the United States, for example, when a foreign national tours an Ecolab facility and examines our technology.
- We comply with all U.S. economic sanctions and trade embargoes, as well as other international sanctions that are consistent with U.S. law, that apply to individuals, organizations or countries that have been sanctioned for terrorism, national security or other foreign policy reasons.
- We follow all applicable customs and chemical inventory laws, including documentation, labeling, tariff classification and valuation for imported items such as biocides, drugs and medical equipment.
- We do not cooperate with or participate in any foreign boycotts of firms, countries or individuals that are not sanctioned or approved by the United States.
- We do not provide boycotted countries with information about any person regarding the individual's race, religion, sex/gender, national origin or business relationships.
- We report concerns using the reporting options available.

Please see our [Global Trade Compliance Policy](#) and the [Global Sensitive Countries and Persons Policy](#) for further details.

# We Protect the Environment

Ecolab is committed to protecting our shared environment.

## HOW DO WE PROTECT THE ENVIRONMENT?

- We strive to follow and promote our values and advance environmental justice by reducing the environmental impact of our global operations, by positively impacting the communities where we operate, and by continuously measuring and refining our program.
- We follow our policies and procedures when generating, handling, storing, transporting and disposing of waste materials, and we strive to eliminate or minimize waste, as well as recycle and reuse.
- We report concerns using the reporting options available.

Please see our [Global Waste Management Policy](#), [Water Stewardship Position](#) and [Climate Change Position](#) and for further details.

## WHAT IS ECOLAB'S ROLE IN PROTECTING THE ENVIRONMENT?

In addition to conducting our operations in an environmentally conscious manner, we work to protect what's vital, including providing sustainable, responsible products and solutions to the communities we serve.





## We Engage in Political Activities Responsibly

Ecolab encourages employees to be active in their communities, but employees cannot claim to represent Ecolab in their personal political activities. Through formal processes, Ecolab makes certain political contributions in accordance with applicable law and subject to the controls in our Global Political Contribution Policy. Ecolab also discloses political contributions on [ecolab.com](https://www.ecolab.com).

### HOW DO EMPLOYEES RESPONSIBLY ENGAGE IN POLITICAL ACTIVITIES?

- We never claim to represent Ecolab nor provide any political contributions on behalf of Ecolab without express approval from, and coordination with, the Government Relations department.
- We use Ecolab resources or facilities for political activities only with express approval from and coordination with the Government Relations department and the Law department.

- We always make clear that any political views we express or political activities we engage in reflect our own personal views and not those of Ecolab.
- We [disclose](#) to the company any potential elected or appointed government position we may hold through our conflicts of interest disclosure process.
- We report concerns using the reporting options available.

Please see our [Global Political Contribution Policy](#) for further details.

### WHAT LOBBYING ACTIVITIES DOES ECOLAB ENGAGE IN?

Ecolab's Government Relations department handles any major contacts with the U.S. government, including lobbying or providing testimony. Outside of the U.S., all government lobbying efforts need to be cleared by the appropriate Government Relations lead in the region and in compliance with global and local country compliance regulations stipulated by the Law department.



# 5 How We Work for Ecolab



# We Avoid Conflicts of Interest

Ecolab expects employees to work in the best interest of the company and to avoid situations where their personal interest conflicts with Ecolab's interests.

## HOW DO WE AVOID CONFLICTS OF INTEREST?

We can look at conflicts of interest in three main categories.

### 1. Relationships

- We obtain pre-approval from our manager and the Global Compliance & Ethics department before:
  - We participate in any hiring, promotion, discipline or other personnel action regarding any family member or close personal relation
- We disclose to our manager and the Global Compliance & Ethics department immediately when:
  - Any family members or close personal relations are working for Ecolab or may seek to work for Ecolab
  - Any family members or close personal relations are working for, or have an ownership or controlling interest in, a competitor, customer, supplier or other partner
  - We or our immediate family owns more than one percent (1%) of the outstanding stock of any Ecolab competitor, supplier or customer

### 2. Financial

- We obtain pre-approval from our manager and the Global Compliance & Ethics department before:
  - Taking on paid or unpaid employment outside of Ecolab
  - Taking on any additional roles outside of Ecolab, including paid or unpaid directorships for any organizations. In addition, chief executive officer approval is required for any position or directorship with a public company.
  - Seeking or accepting any elected or appointed government position

### 3. Confidential Information and Ecolab Resources

- We do not take personal advantage, nor encourage our family or others to take advantage, of any business opportunities or knowledge learned in our role at Ecolab for personal gain.
- We do not take on roles that interfere with our duties and responsibilities at Ecolab, that require the use of Ecolab facilities, resources and time, or that involve work for or on behalf of an Ecolab competitor.

## WHAT IS A CONFLICT OF INTEREST?

A conflict of interest can occur when an employee's personal interest, or the personal interest of an employee's family member or close personal relation, could conflict with the interests of Ecolab.

A close personal relation is a spouse or domestic partner of an employee's immediate family member, a member of the same household, or anyone intimately or romantically involved with the employee.

We recognize that potential conflicts of interest may be difficult to resolve and that it is best to ask questions and seek guidance from the Global Compliance & Ethics department when these potential conflicts arise.

Use the [Possible Conflict of Interest Disclosure Form](#) to obtain pre-approval or immediately disclose any potential conflicts as required under this section.

#### QUESTION

I have been offered an opportunity to do graphic design work for another company part time. They are okay with me working after hours and on my lunch breaks at Ecolab. Would it be okay for me to say "yes"?

#### ANSWER

Before you accept, you should disclose this opportunity to your manager and the Global Compliance & Ethics department to make sure there is no potential conflict with your role at Ecolab. Additionally, if you are working on your lunch break, would you be using Ecolab's network to communicate and complete the other company's work? It is possible there are potential conflicts here you have not considered.





## We Exchange Gifts, Hospitality and Entertainment Ethically

Ecolab recognizes the importance of gifts and entertainment in conducting business worldwide, but we must also ensure that our gift and entertainment expenses are appropriate and that they reflect good business practices.

### HOW DO WE EXCHANGE GIFTS AND ENTERTAINMENT RESPONSIBLY?

#### Offering gifts and entertainment

- We do not offer gifts or entertainment in an attempt to influence any business decisions with customers, suppliers or other partners.
- We do not offer gifts or entertainment that are outside accepted local custom or do not serve a legitimate business purpose.
- We cannot offer business partners any cash, cash equivalents, such as gift cards or vouchers, or personal loans.
- We must understand the laws and our policies before providing gifts or entertainment to government officials. See [We Do Not Participate In Bribery and Corruption](#) for further guidance.
- We cannot offer gifts and entertainment to healthcare professionals. See our [Global Healthcare Professionals Interaction Policy](#) for further details.
- We cannot offer gifts and entertainment, except a nominal meal, to suppliers if we are a Supply Chain employee. See the [Global Gifts and Entertainment Policy for Global Supply Chain](#) for details.
- We cannot offer gifts and entertainment to [U.S. government employees](#).
- We cannot provide any gifts or entertainment that might be embarrassing or harm Ecolab's reputation, nor do we provide entertainment at inappropriate venues.
- We do not offer gifts or entertainment that violate our Code, our policies or any applicable law, and we follow any local policies regarding gifts and entertainment.
- We ask questions and report concerns using the reporting options available.

#### Accepting gifts and entertainment

- We do not accept any gifts or entertainment, whatever the value, that are meant to improperly influence our decision-making on behalf of Ecolab.
- We cannot accept from business partners any cash, cash equivalents, such as gift cards or vouchers, or personal loans.
- We ask questions and report concerns using the reporting options available

Local Ecolab country management may have more specific guidelines on giving and receiving gifts. Consult your local policy, your local Human Resources representative or the Global Compliance & Ethics department for further guidance.

Please see our [Global Travel and Expense Policy](#), [Global Gifts and Entertainment Policy for Global Supply Chain](#), [Global Healthcare Professionals Interaction Policy](#) and [Global Gifts, Travel, Entertainment and Meals Position](#) for further details.

## WHAT IS AN APPROPRIATE GIFT OR ENTERTAINMENT?

Appropriate gifts are nominal in value, and entertainment should be reasonable in cost, quantity and frequency.

### QUESTION

One of our customers requested a meal at the most expensive restaurant in town. He also plans to bring his spouse. Can I pay for the meal?

### ANSWER

No. We can't provide extravagant meals to customers. We also cannot pay for anyone who does not have a legitimate business need to attend, like a spouse. This sets up a situation where your credibility and the reputation of Ecolab could be tarnished.





## WHAT IS CONFIDENTIAL INFORMATION?

Confidential information is sensitive, confidential, or proprietary information of Ecolab or our customers, suppliers or business partners that must be given appropriate protections. Generally, information is considered confidential and proprietary if it is not publicly available.

## WHAT IS INTELLECTUAL PROPERTY?

Intellectual property, or IP, refers to Ecolab's valuable assets – developed to aid in future innovation – and includes our product plans and strategies, patents, trademarks, copyrights, trade secrets and know-how.

# We Protect Confidential Information

Ecolab places great value on protecting confidential and proprietary information. This includes our intellectual property.

## HOW DO WE PROTECT CONFIDENTIAL INFORMATION?

- We protect confidential and proprietary information, such as long-term strategies, product development plans, personnel records, sales and marketing plans, communications plans, financial data, intellectual property, competitive intelligence, customer information, acquisition or divesture plans and manufacturing methods, from unauthorized use or disclosure.
- We do not allow any unauthorized use or disclosure of our confidential and proprietary information, and we always follow all our procedures for protecting our information.
- We do not share any confidential or proprietary information unless the recipient has a business need to know and we have obtained required approvals and all necessary confidentiality and nondisclosure agreements in place.
- We also protect the confidential information and intellectual property entrusted to us by our customers and business partners, and we follow our security policies by sharing third party information only with Ecolab employees and select business partners that have a business need to know.

- We do not use confidential or proprietary information for personal gain either during our employment with Ecolab or after we leave Ecolab.
- We consult the [Global Intellectual Property Policy](#) if we have any questions on the use of Ecolab's intellectual property.
- We report concerns using the reporting options available.

Please see our [Global Information Security Policy](#) and our [Global Intellectual Property Policy](#) for further details.



# We Manage Our Business Partners Responsibly

Ecolab expects our business partners, including our suppliers and other partners, to adhere to the same standards and principles that we do.

## HOW DO WE MANAGE OUR BUSINESS PARTNERS?

- We conduct appropriate due diligence with all new suppliers and other business partners in accordance with our Ethical Sourcing Standards and procurement and sourcing procedures.
- We follow our procurement policies and ensure that spending and expenses for business partners are reasonable, necessary and business related.
- We have established compliance requirements for our direct suppliers regarding conflict minerals, implementing controls and reporting, and undertaking appropriate sourcing efforts, and we provide our customers with the data necessary to facilitate their conflict minerals reporting.
- We expect all our suppliers and other third parties to meet basic standards for employment practices - including the prohibition of child labor, forced labor and discrimination - health and safety, environmental protection, anti-bribery, competition and conflict minerals use and reporting.
- We expect all third parties that are acting on our behalf to follow our policies and procedures and to comply with all applicable laws.
- We report concerns using the reporting options available.

Please see our [Supplier Code of Conduct](#), [Conflict Minerals Policy](#), [Global Procurement Policy](#) and [Global Anti-Corruption Policy and Procedures](#) for further details.



## WHAT STANDARDS DOES ECOLAB EXPECT BUSINESS PARTNERS TO FOLLOW?

Ecolab has established [Ethical Sourcing Standards](#) that include verification, certification, accountability and training for suppliers to enable them to meet our expectations as well as abide by our [Supplier Code of Conduct](#).



## WHAT IS DATA SECURITY?

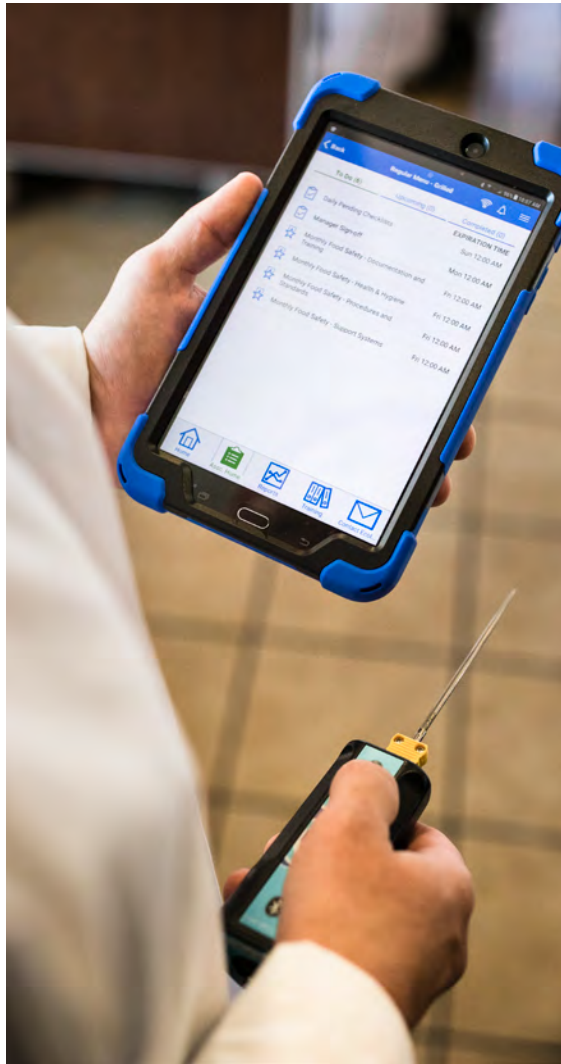
Data security is the process we put in place to secure our data and information from unauthorized access.

## We Secure Our Data

Ecolab takes data security seriously and maintains policies and procedures to protect Ecolab's sensitive and confidential information and to securely maintain the sensitive and confidential information of our employees, customers, suppliers and business partners. It is imperative that we all work to ensure this data does not end up in the wrong hands. Ecolab has strict policies, standards and procedures to help protect sensitive or confidential information, including electronic data stored in our systems.

### HOW DO WE SECURE OUR DATA?

- We follow all our data security policies, standards and procedures for accessing, entering, handling, storing and transferring data, and we access our sensitive and confidential information only when we have a business need to access it.
- We grant access to confidential data or sensitive information only to those that need to know as part of their jobs.
- We immediately report suspected information technology (IT) incidents or problems to the Ecolab Global IT Service Desk or the Ecolab Monitoring and Escalation Center (EMEC) using the Information Security Hotline (402-517-9865) or the Information Security mailbox ([informationsecurity@ecolab.com](mailto:informationsecurity@ecolab.com)).



## We Protect Ecolab Assets

Ecolab is able to meet our customers' needs and pursue our mission only through the proper use and maintenance of our corporate assets.

### HOW DO WE PROTECT OUR ASSETS?

- We conserve and protect our corporate assets and use them for business purposes.
- We maintain and manage assets for which we are responsible and protect them from theft, loss, abuse and misuse.
- We understand that Ecolab's networks, internet access, phone and email systems are intended for business purposes, with only limited and appropriate personal use, as detailed in our [Global Information Systems Acceptable Use Policy](#) and [Global Social Media Policy](#).
- We understand that Ecolab may monitor our use of Ecolab's electronic assets and networks.
- We report any concerns about misuse, theft or loss of Ecolab assets to our manager or IT or through the Code of Conduct Helpline.

### QUESTION

I have a personal project I am working on, and I need a specific tool that I do not have at home. My plant location has the tool, and it's not used often. Is it okay if I bring the tool home for just one night?

### ANSWER

No. It is improper to use Ecolab assets for personal projects.

### WHAT ARE ECOLAB'S ASSETS?

Our assets include our raw materials, equipment, office supplies, technology and electronic assets, financial assets including corporate cards, facilities and [intellectual property](#).



## We Do Not Engage in Insider Trading

Ecolab protects material, non-public information, and we do not trade securities or tip others to do so based on such information.

### HOW DO WE AVOID INSIDER TRADING?

- We do not buy or sell Ecolab stock, or stock of any other company, while aware of material, non-public or insider information.
- We do not tip or provide insider information to anyone.
- We seek pre-clearance from the Law department before we trade any Ecolab securities if we are senior executive officers or directors of Ecolab, or if we are senior management or a designated insider undertaking a transaction outside of a quarterly window period.
- We ask questions and contact the Law department if we are unsure about insider trading laws and the ways in which they apply to our individual situation.
- We report concerns using the reporting options available.

Please see our [Global Insider Trading Policy](#) for further details.

### WHAT IS INSIDER TRADING?

Insider trading is the trading of a company's securities by individuals with access to insider information, which is material non-public information about the company.

# We Keep Accurate Records

Ecolab's records must always accurately and completely reflect the business we conduct.

## HOW DO WE KEEP ACCURATE RECORDS?

- We maintain complete, accurate and timely records that are never misleading, incomplete or meant to obscure the facts.
- We maintain accounting records and financial statements that conform to all legal requirements and generally accepted accounting principles and that are consistent with our [Global Accounting and Control Policy](#).
- We do not maintain unrecorded or "off the books" funds or assets.
- We watch for red flags within transactions, such as a business partner making odd payment requests or exhibiting a reluctance to provide information, and we report any activity we think might be money laundering to the [Law department](#).
- We take measures to provide that all of our disclosures to the public, including reports, press releases and analysts and stockholder communications, are accurate, timely and free from any false or misleading statements.
- We create, maintain and destroy our records according to our [Global Records Management Policy](#) and [Global Records Retention Schedule](#).
- We comply with any "legal hold" notices and make sure to save all records associated with such orders.
- We contact the [Law department](#) when we have questions about recordkeeping, "legal holds" or any reporting.
- We report concerns using the reporting options available.

Please see our [Global Travel and Expense Policy](#), [Global Records Management Policy](#), [Global Records Retention Schedule](#), [Tax Position](#), [Global Anti-Money Laundering Policy](#) and [Global Accounting and Control Policy](#) for further details.

## WHAT RECORDS DO WE KEEP?

We keep records about our business, which can include accounting records, financial statements, reports, customer information, proprietary information, emails, contracts and other data and information, in any format.

## QUESTION

I was recently traveling on business and spent cash for several meals, taxi rides and other expenses. I was busy and didn't collect any receipts, so when I returned, I re-created some receipts to the best of my memory to turn in with my expense report to reflect the cash I had spent. I told my manager about the situation, and she said to just turn in the expense report and the re-created receipts, and she would approve it. Is this okay?

## ANSWER

No. All of Ecolab's business records, including the receipts from your travel, must be accurate, complete and never fabricated. You should not submit the re-created receipts.



Shares of our stock are publicly traded on the New York Stock Exchange (NYSE). As a publicly traded company, Ecolab is subject to U.S. securities laws administered by the Securities and Exchange Commission (SEC) and to the rules of the NYSE, and we all must comply with these laws and rules. If any disclosures made by Ecolab in financial statements, communications or filings with the SEC or NYSE are materially false or misleading, both the company and employees who are involved could face civil and criminal penalties.

- Accordingly, disclosures to the investing public, including periodic reports, press releases and analyst and stockholder communications, must be accurate and timely.
- We should never make willful or knowingly false or misleading statements or omissions in any Ecolab disclosures, reports or registration statements filed with the SEC or NYSE or any other stock exchange on which Ecolab securities are listed. In addition, each of us is obligated to cooperate if internal or external auditors ask questions or request information.
- Ecolab's senior officers and finance and accounting professionals, led by our CEO, our CFO and our Corporate Controller, play an important role in ensuring that our financial records and disclosures are complete, accurate and timely. In addition to adhering to all provisions of this Code and those of any related policies, procedures and manuals, our senior officers and finance and accounting employees must act in good faith, and with due care, competence and diligence, without misrepresenting material facts or allowing their independent judgment to be subordinated.

# We Communicate Appropriately

To enhance and protect our reputation, we must communicate in a positive, truthful and consistent manner, and speak with one voice.

## HOW DO WE COMMUNICATE APPROPRIATELY?

- We do not share any confidential or proprietary information publicly or on social media.
- We must always be cautious when discussing business matters outside of Ecolab or in a public forum.
- We remember that our Code and our policies apply online and that what we post on social media can have a lasting impact on us, our customers and Ecolab.
- We make sure it is clear we are speaking for ourselves and not Ecolab when using social media.
- We refer any requests from analysts or investors to our Investor Relations department.
- We submit any news releases, media articles and other editorial content to the Global Communications team to review before it is released to the public.
- We contact the Global Communications team before accepting an invitation to speak or present to any public audience on behalf of Ecolab, including any presentations at technical conferences.
- We talk to our manager or contact the Global Communications team if we have questions about communications or social media use.
- We report concerns using the reporting options available.

Please see our [Global Media Interaction Policy](#), [Global Social Media Policy](#) and [Global External Communications Policy](#) for further details.



## WHAT IS THE GLOBAL COMMUNICATIONS TEAM?

The Global Communications team, part of Global Marketing & Communications, is responsible for managing Ecolab's reputation. The team also manages the company's enterprise social media channels and handles questions from external stakeholders, including the media. To maintain consistency in our public communications, we refer media requests to this team.





© 2023 Ecolab USA Inc. All rights reserved.