

GLOBAL ANTI-HUMAN TRAFFICKING POLICY

Purpose

This policy sets forth Ecolab's approach to combatting human trafficking and documents how Ecolab complies with the requirements of Federal Acquisition Regulation ("FAR") Subpart 22.17. This policy is consistent with Ecolab's Code of Conduct, Supplier Code of Conduct, and our core values to protect and advance human dignity and human rights in our global business practices.

Scope

This policy applies to all Ecolab personnel, including directors, officers, and employees including those of Ecolab's subsidiaries; and applies equally to Ecolab's agents, subcontractors, product suppliers, distributors, vendors, and other firms that furnish supplies or services to or for Ecolab (collectively the "Covered Entities").

Policy

The United States Government and Ecolab have a long-standing, zero-tolerance policy prohibiting trafficking-related activities. As required by law, and pursuant to Ecolab Policy, Ecolab and Covered Entities shall not:

- ▶ Engage in trafficking in persons, which includes (A) sex trafficking in which a commercial sex act is induced by force, fraud, or coercion, or in which the person induced to perform such act has not attained 18 years of age; and (B) the recruitment, harboring, transportation, provision, or obtaining of a person for labor or services, through the use of force, fraud, or coercion for the purpose of subjection to involuntary servitude, peonage, debt bondage, or slavery;
- ▶ Procure commercial sex acts;
- ▶ Use forced labor in the performance of any contract;
- ▶ Destroy, conceal, confiscate, or otherwise deny access by an employee to the employee's identity or immigration documents, such as passports or drivers' licenses, regardless of issuing authority;
- ▶ Use misleading or fraudulent practices during the recruitment of employees or offering of employment, such as failing to disclose, in a format and language accessible to the worker, basic information or making material misrepresentations during the recruitment of employees regarding the key terms and conditions of employment, including wages and fringe benefits, the location of work, the living conditions, housing and associated costs (if employer or agent provided or arranged), any significant cost to be charged to the employee, and, if applicable, the hazardous nature of the work;
- ▶ Use recruiters that do not comply with local labor laws of the country in which the recruiting takes place;
- ▶ Charge employees recruitment fees;
- ▶ Fail to provide return transportation or pay for the cost of return transportation upon the end of employment for an employee who is not a national of the country in which the

work is taking place and who was brought into that country for the purpose of working on a U.S. Government contract or subcontract (some limited exceptions apply);

- ▲ Where housing is provided, provide or arrange housing that fails to meet the host country housing and safety standards; or
- ▲ If required by law or contract, fail to provide an employment contract, recruitment agreement, or other required work document in writing.

Responsibility

Ecolab’s directors, officers, and employees, and the Covered Entities, are responsible for complying with this Policy. Any violation of this Policy could result in disciplinary action, up to, and including, removal from a contract, reduction in benefits, termination of a business relationship, or termination of employment. Additionally, knowing violations of Government regulations or statutes regarding trafficking in persons could result in civil, administrative (i.e., suspension or debarment), and/or criminal sanctions against the individual employee.

Ecolab will include the substance of this Policy – either in full text or by incorporating the applicable FAR clause – in applicable contracts with Covered Entities.

Reporting

- ▲ Credible information regarding a potential violation of this Policy, whether by a Ecolab employee or a Covered Entity, must be promptly reported to a manager, the Human Resources Department, or to the Law Department by phone, email, or in person.
- ▲ Alternatively, violations may be reported anonymously through the Company’s toll-free Code of Conduct Helpline. The helpline number for your area of operation can be found on the back cover of the Code of Conduct booklet.
- ▲ Employees or Covered Entities aware of potential human trafficking violations also may contact the Global Human Trafficking Hotline directly at 1-844-888-FREE or help@befree.org.
- ▲ Any manger or Human Resources personnel receiving notification of a potential violation of this Policy immediately shall report the matter to the Law Department so the Law Department immediately can make a disclosure to the U.S. Government if necessary.
- ▲ Ecolab policy and federal law prohibit retaliation against those who make reports of misconduct and prohibit interfering with employees’ cooperation with Government authorities investigating allegations of prohibited activity.

For further information regarding this Policy, please contact the Law Department.

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