

GLOBAL NON-RETALIATION POLICY

Purpose

The purpose of this policy is to establish protections for individuals who report alleged or actual violations of Ecolab's Code of Conduct or applicable laws and regulations.

Scope

The policy applies to all employees and contingent workers when involved in possible retaliatory situations.

Policy

Ecolab does not tolerate Retaliatory Behavior, 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.

Any employee, regardless of position or title, that has engaged in retaliation as determined by Global Compliance, will be subject to discipline, up to and including termination of employment.

All employees and contingent workers are responsible to follow the policy and report alleged retaliation.

Explanation of Key Terms

Retaliatory Behavior | Retaliatory behavior is any behavior intended to intimidate, threaten, coerce, discriminate against, or take other retaliatory action against individuals who in good faith and in a reasonable manner exercises their rights to report or otherwise disclose concerns under the Code of Conduct.

Responsibility

All employees and contingent workers are responsible to follow the policy and report alleged retaliation.

Reporting

Alleged retaliation should be reported though the Code of Conduct Helpline, or through the European Union Whistleblower Helpline for employees and contingent workers in European Union countries who choose to report through that channel.

References

- Ecolab Code of Conduct
- Code of Conduct Helpline & European Union Whistleblower Helpline



| Version # | Date | Description | Revised By |
|---------------------|------------|-----------------|-------------------|
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