

POLICY STATEMENT ON CONFLICT MINERALS

Purpose

As a socially responsible company, Ecolab has concern for the well-being of people and communities. As outlined in Ecolab's [Code of Conduct](#), we conduct business fairly and ethically, respect human rights, and comply with all applicable laws and regulations. Ecolab's Conflict Minerals Policy articulates Ecolab's commitment to not directly or indirectly source tin, tungsten, tantalum, and gold, known as the "conflict minerals", from smelters and refiners that finance or benefit armed groups in the Democratic Republic of Congo (DRC) and adjoining countries.

Scope

This policy applies to global Ecolab, including joint ventures that are majority-owned by Ecolab, and Ecolab's suppliers of materials containing tin, tungsten, tantalum, and gold.

Policy

In August 2012, the United States Securities and Exchange Commission (SEC) approved the final rule regarding the sourcing of conflict minerals as defined in the Dodd-Frank Wall Street Reform and Consumer Protection Act, Section 1502. Under this rule, publicly traded companies must report annually to the SEC the presence of conflict minerals originating from the Democratic Republic of Congo (DRC) and adjoining countries in the products they manufacture, contract to manufacture, or use in the production process.

To comply with the Dodd-Frank Act, Ecolab has established a compliance program that follows the recommendations established by the Organisation for Economic Co-operation and Development (OECD) Guidance. In accordance with these guidelines, Ecolab annually solicits direct suppliers of conflict minerals and undertakes appropriate sourcing efforts. Ecolab files a Form SD and a Conflict Minerals Report with the Securities and Exchange Commission and makes these documents publicly available on the Ecolab website. Ecolab also provides its customers with the data necessary to facilitate the customers' annual SEC filing.

Ecolab has aligned its efforts with practices established by industry associations – including the Responsible Minerals Initiative – to enable companies to source conflict-free minerals.

Expectations for Suppliers

Suppliers are expected to supply materials to Ecolab that are "DRC Conflict-Free". Suppliers are also expected to establish due diligence programs and to adopt policies and management systems consistent with the OECD Guidance and to extend these requirements to their own suppliers.

"DRC Conflict-Free" products supplied to Ecolab:

1. Do not contain tantalum, tin, tungsten, or gold as elements necessary to the products' production or functionality, OR,

2. Contain only tantalum, tin, tungsten, or gold originating outside the DRC and adjoining countries, from scrap or recycled sources, or from smelters or refiners that have been validated by an independent private sector party to be conformant.

Ecolab will survey direct suppliers as a part of our conflict minerals due diligence program. Suppliers are expected to respond to survey requests in a timely manner and with full disclosure.

In the event that Ecolab determines that a supplier's efforts to comply with this policy have been deficient and the supplier fails to cooperate in developing and implementing reasonable remedial steps, Ecolab reserves the right to take appropriate actions up to and including discontinuing purchases from the supplier.

Explanation of Key Terms

Conflict Mineral | Cassiterite, columbite-tantalite, gold, wolframite, and their derivatives, tin, tantalum, and tungsten

The Democratic Republic of Congo and adjoining countries | The countries of Democratic Republic of Congo, Republic of Congo, Central Africa Republic, South Sudan, Zambia, Angola, Tanzania, Burundi, Rwanda, and Uganda

Conformant Smelters and Refiners | Smelters and refiners that have successfully completed an assessment against the applicable Responsible Minerals Assurance Process standard or an equivalent cross-recognized assessment, as listed by the Responsible Minerals Initiative.

Responsibility

The Conflict Minerals Steering Committee has responsibility and oversight of the Ecolab Conflict Minerals program.

Compliance

Ecolab is required to make filings pursuant to Rule 13p-1 under the Securities Exchange Act of 1934.

Reporting

Ecolab files a yearly Form SD and Conflict Minerals Report that are publicly available on Ecolab.com.

References

- [OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas](#)
- [Rule 13p-1 under the Securities Exchange Act of 1934](#)

Version #	Date	Description	Revised By
Initial Release	11/01/2013	Initial Release	Global Supply Chain
2	01/01/2022	Document Refresh	Global Supply Chain and Trade Compliance