

Policy Statement
according to sec. 6 para. 2
German Supply Chain Due Diligence Act

Foreword

Ecolab has been committed to providing innovative water-, hygiene- and infection control solutions for more than 100 years. In over 170 countries worldwide, more than 47,000 Ecolab employees are striving to support clean and safe working and living conditions. Our goal is to *protect what's vital*. Accordingly, Ecolab has long prioritized the protection of human rights and the environment. In 2012, Ecolab Inc. signed the United Nations (UN) Global Compact for the protection of human rights and sustainability on behalf of the entire Ecolab Group and was recognized as a Global Compact LEAD participant in 2021, along with 37 of the 12,000 companies participating at the time. Ecolab also participates in EcoVadis sustainability rankings and is among the top 1% of all companies assessed with a platinum ranking.

Ecolab's commitment to respecting and promoting human rights and protecting the environment is deeply embedded in our values and embedded in our Codes of Conduct for employees and suppliers. We have aligned our operations with social responsibility certification standards and have obtained certifications for our facilities in the areas of occupational health and safety, environmental protection and energy management. This fundamental orientation of the Ecolab Group is incorporated into the risk management of those Ecolab Group companies that are now subject to due diligence obligations under the German Supply Chain Due Diligence Act (GSCDDA) since January 1, 2024.

Together with our customers and business partners, we are committed to preventing and minimizing human rights and environmental risks and immediately ending any adverse effects on environmental protection or human rights in order to jointly *protect what's vital*.

Management of Ecolab DE 1 GmbH

Priority human rights and environmental risks

Ecolab carries out systematic risk analyses with regard to human rights and environmental risks in accordance with legal requirements, both for its own business operations and regarding the supply chain. The following risks are being analyzed:

- Child labor,
- Forced labor,
- Violation of occupational health and safety regulations,
- Disregard of the right to freedom of association,
- Unequal treatment in employment,
- Withholding an appropriate wage,
- harmful environmental emissions,
- Unlawful seizure of land, forests and waters,
- Misconduct by security forces deployed to protect corporate projects,
- Violations of the Minamata Convention on Mercury,
- Violations of the Stockholm Convention on Persistent Organic Pollutants, and
- Violations of the Basel Convention regarding the transboundary shipment of waste.

Based on the evaluation to date, the risk categories of **violations of occupational health and safety regulations** and **harmful environmental emissions** were identified as priorities for our own business operations. With regard to Ecolab's supply chains, the **withholding of an appropriate wage** in the sense of a living wage was identified as an additional priority risk category.

Expectations of employees and suppliers

Our principles and expectations are set forth in the *Ecolab Code of Conduct*, the *Ecolab Supplier Code of Conduct* and this Policy Statement. Ecolab expects its employees and business partners to respect human rights, protect the environment and utilize the opportunity to report violations of our principles and values through the *Ecolab-Helpline*.

We expect our business partners to respect and promote our principles and values, in particular our efforts to ensure a safe working environment, our efforts to protect the environment from harmful emissions and our commitment to ensuring a living wage for work performed. Business partners should live up to this expectation by appointing responsible parties and implementing measures and processes that enable them to identify and minimize human rights and environmental risks and put an end to reported violations.

In the event of violations of human rights and/or environmental obligations, we expect to be duly informed and our business partners to be prepared to work together cooperatively and openly in order to put an end to these violations as quickly, effectively and sustainably as possible. For the purpose of conducting risk analyses in the area of human rights and environmental protection, we also expect our business partners' support by providing relevant data.

Ecolab risk management

The existing global Ecolab standards for the protection of human rights and the environment have been integrated into the GSCDDA risk management system for the Ecolab Group's own business operations in Germany and the Group companies affiliated with Ecolab DE 1 GmbH's own business operations. In addition to the Ecolab companies concerned and their business partners, risk

management also includes indirect suppliers on an ad hoc basis. Responsibility for the implementation, operation and improvement of risk management has been assigned to a centrally responsible function. In addition, the cooperation of this centrally responsible GSCDDA risk management function with departments and other functions involved in risk management, in particular management, HR and purchasing departments, as well as responsible persons for occupational health, safety and the environment, has been defined. Ecolab therefore has a clear, non-overlapping risk management structure. In addition, reporting forms and channels have been defined to provide all departments and functions relevant to risk management with the necessary information and to ensure an effective approach to protecting human rights and the environment.

Risk analysis

Ecolab carries out a risk analysis at least once a year to assess human rights and environmental risks in its own business operations and at direct suppliers. In addition, it is ensured that in the event of significant changes to the risk situation, existing risks are analyzed on an ad hoc basis, if necessary, also at indirect suppliers. The methodology of the analysis is geared towards compliance with the requirements described in the relevant guidelines of the responsible supervisory authority (German Federal Office of Economics and Export Control - BAFA).

Prioritized risks are identified in several steps based on a consolidated database of the companies belonging to the Ecolab Group in Germany own business operations, their locations, and direct suppliers, under careful evaluation of the available information. As part of an abstract analysis, country, industry, and product-related risk groups are formed on the basis of publicly available data. Relevant risk suppliers are subjected to a tool-based detailed analysis with further consideration of Ecolab's ability to exert influence upon relevant suppliers. This approach leads to an evaluation of GSCDDA-relevant risks considering probability of occurrence, potential level of damage and existing control measures. The results of such detailed analyses provide information on priority risk categories and countries in which the risks of violating human rights or environmental protection regulations are comparatively high due to Ecolab's business activities. Ecolab also derives from this which groups of people could be affected in their interests. This includes employees in Ecolab's own business operations and supply chains as well as relevant groups of people who may be affected by the business activities of Ecolab or its suppliers. Ecolab strives to continuously optimize the data basis for risk analyses in order to create transparency throughout the supply chains.

Preventive measures

Employees are required to comply with the Ecolab Code of Conduct at the beginning of their employment with Ecolab. In addition, certain Ecolab facilities are certified according to ISO 45001 ("Occupational Health and Safety Management Systems") and qualified persons are designated as responsible for compliance with occupational health and safety and environmental protection regulations. Employees receive regular training, particularly with regard to job-specific occupational health and safety and environmental protection aspects .

When initiating new business relationships, Ecolab evaluates business partners on a risk basis with regard to the human rights and environmental protection standards applied. Ecolab also endeavors to require all business partners to comply with the Ecolab Supplier Code of Conduct and to meet the expectations contained in this Policy Statement. In the event of violations, Ecolab reserves the right to exercise contractually agreed auditing or training rights. If violations cannot be adequately addressed, Ecolab will terminate the business relationship if necessary.

Remedial measures

If Ecolab becomes aware (e.g. due to public reporting or reports received via the reporting channel) that violations of human rights or environmental obligations are imminent or have already occurred, a

process to take remedial measures will be initiated immediately. The implementation of this process is aimed at ending or minimizing the violation in accordance with legal requirements.

Complaints procedure

Ecolab employees, business partners and third parties can report possible violations of human rights and environmental protection directly to Ecolab via the *Ecolab Helpline* ([EthicsPoint - Ecolab](#)). The Ecolab Helpline can be reached via an online reporting portal at the above link, as well as by telephone. Reports can be made confidentially or, if the person making the report prefers, anonymously. Reports received are objectively evaluated and investigated by independent employees. Ecolab will protect reporting persons from retaliation to the best of its ability and in accordance with Ecolab's [Global Non-Retaliation Policy](#).

If reports are received, Ecolab will consider them to conduct an ad hoc risk analysis or initiate the process to take corrective actions, where needed.

Effectiveness control

Using certain key performance indicators, Ecolab's internal audit department determines the effectiveness of the following risk management elements annually and, if necessary, on an ad hoc basis

- prevention measures implemented,
- the remedial action taken, and
- complaints procedure.

In this context, compliance with the guidelines and processes integrated into GSCDDA risk management is also reviewed. For the internal audit review, the use of the reporting channel and reports received via the reporting channel are also evaluated for indications of potential improvements to GSCDDA risk management. If necessary, GSCDDA risk management is adjusted based on the findings of the review.

Documentation

Ecolab documents the fulfillment of human rights and environmental due diligence obligations in accordance with legal requirements. Ecolab publishes an annual *Corporate Responsibility Report* for the global organization, which provides further information on the protection of human rights and the environment at Ecolab.