# 2016 CORPORATE SUSTAINABILITY REPORT GRI INDEX



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### **GLOBAL REPORTING INITIATIVE CONTENT INDEX**

This report was prepared in alignment with the Global Reporting Initiative's G4 Core Sustainability Reporting Guidelines. For more information, please visit <u>www.globalreporting.org</u>.

### **G4 GENERAL STANDARD DISCLOSURES**

### **Strategy and Analysis**

PROFILE DISCLOSURE	DESCRIPTION	REPORTED	CROSS-REFERENCE/ DIRECT ANSWER
G4-1	Statement from the most senior decision-maker of the organization	Fully	2016 Corporate Sustainability Report Summary page 3
G4-2	Description of key impacts, risks and opportunities	Fully	Page 20, 2016 Sustainability Report Summary pages 3-35, and CDP submission sections 2, 5 and 6

### **Organizational Profile**

PROFILE DISCLOSURE	DESCRIPTION	REPORTED	CROSS-REFERENCE/ DIRECT ANSWER
G4-3	Name of the organization	Fully	Ecolab
G4-4	Primary brands, products and services	Fully	Ecolab's 2016 Annual Report and Form 10-K
G4-5	Location of the organization's headquarters	Fully	Ecolab Global Headquarters 1 Ecolab Place St. Paul, MN 55102
G4-6	Number of countries where the organization operates, and names of countries where either the organization has significant operations or that are specifically relevant to the sustainability topics covered in the report	Fully	Ecolab's 2016 Annual Report and Form 10-K
G4-7	Nature of ownership and legal form	Fully	Ecolab's 2016 Annual Report and Form 10-K
G4-8	Markets served	Fully	Ecolab's 2016 Annual Report and Form 10-K
G4-9	Scale of the organization	Fully	Page 20
G4-10	Total number of employees	Partially	Pages 21-22

PROFILE DISCLOSURE	DESCRIPTION	REPORTED	CROSS-REFERENCE/ DIRECT ANSWER
G4-11	Percentage of total employees covered by collective bargaining agreements	Fully	Page 22
G4-12	Describe the organization's supply chain	Fully	Page 22
G4-13	Significant changes during the reporting period regarding the organization's size, structure, ownership or supply chain	Fully	Page 23
G4-14	Whether and how the precautionary approach or principle is addressed by the organization	Fully	Page 23
G4-15	List externally developed economic, environmental and social charters, principles or other initiatives to which the organization subscribes or which it endorses	Fully	Page 24
G4-16	List memberships of associations and national or international advocacy organizations in which the organization is engaged	Fully	Page 24

### Identified Material Aspects and Boundaries

PROFILE DISCLOSURE	DESCRIPTION	REPORTED	CROSS-REFERENCE/ DIRECT ANSWER
G4-17	List all entities included in the organization's consolidated financial statements or equivalent documents	Fully	Ecolab's 2016 Annual Report and Form 10-K
G4-18	Explain the process for defining the report content and the Aspect Boundaries and how the organization has implemented the Reporting Principles for Defining Report Content	Fully	Pages 12-13 (Materiality Assessment)
G4-19	List all the Material Aspects identified in the process for defining report content	Fully	Pages 14-15
G4-20	Aspect Boundary within the organization for each material Aspect	Fully	Pages 14-15
G4-21	Aspect Boundary outside the organization each material Aspect	Fully	Pages 14-15
G4-22	Effect of any restatements of information provided in previous reports, and the reasons for such restatements	Fully	Pages 18-19
G4-23	Significant changes from previous reporting periods in the Scope and Aspect Boundaries	Fully	Pages 14-15

### Stakeholder Engagement

PROFILE DISCLOSURE	DESCRIPTION	REPORTED	CROSS-REFERENCE/ DIRECT ANSWER
G4-24	List of stakeholder groups engaged by the organization	Fully	Pages 16-17
G4-25	Basis for identification and selection of stakeholders with whom to engage	Fully	Pages 16-17
G4-26	Organization's approach to stakeholder engagement	Fully	Pages 16-17
G4-27	Key topics and concerns that have been raised through stakeholder engagement, and how the organization has responded to those key topics and concerns	Fully	Page 24

### **Report Profile**

PROFILE DISCLOSURE	DESCRIPTION	REPORTED	CROSS-REFERENCE/ DIRECT ANSWER
G4-28	Reporting period	Fully	1 January - 31 December 2016
G4-29	Date of most recent previous reports	Fully	2015
G4-30	Reporting cycle	Fully	Annual
G4-31	Contact point for questions regarding the report or its contents	Fully	<u>sustainability@ecolab</u> .com
G4-32	"In accordance" option the organization has chosen	Fully	Page 2
G4-33	Organization's policy and current practice with regard to seeking external assurance for the report	Fully	Page 25

### Governance

PROFILE DISCLOSURE	DESCRIPTION	REPORTED	CROSS-REFERENCE/ DIRECT ANSWER
G4-34	Governance structure of the organization	Fully	Page 25 and Ecolab's 2016 Annual Report and Form 10-K

### Ethics and Integrity

PROFILE DISCLOSURE	DESCRIPTION	REPORTED	CROSS-REFERENCE/ DIRECT ANSWER
G4-56	Organization's values, principles, standards and norms of behavior	Fully	Page 26

### **G4 SPECIFIC STANDARD DISCLOSURES**

### Economic

PROFILE DISCLOSURE	DESCRIPTION	REPORTED	CROSS-REFERENCE / DIRECT ANSWER
G4-EC DMA	Disclosure of management approach	Fully	Ecolab's 2016 Annual Report and Form 10-K
G4-EC1	Direct economic value generated and distributed	Partially	2016 Annual Report and Form 10-K
G4-EC2	Financial implications and other risks and opportunities for the organization's activities due to climate change	Fully	Ecolab's 2016 Annual Report, From 10-K and Ecolab's submission to the CDP
G4-EC3	Coverage of the organization's defined benefit plan obligations	Partially	Ecolab's 2016 Annual Report and Form 10-K
G4-EC4	Financial assistance received from government	Fully	Page 27
G4-EC5	Ratio of standard entry level wage by gender compared to local minimum wage at significant locations of operations	Fully	Page 27
G4-EC6	Proportion of senior management hired from the local community at significant locations of operation	Fully	Page 27
G4-EC7	Development and impact of infrastructure investments and services supported	Fully	Page 28
G4-EC8	Significant indirect economic impacts	Fully	Page 28
G4-EC9	Proportion of spending on local suppliers at significant locations of operation	Fully	Pages 28-29

### Environmental

PROFILE DISCLOSURE	DESCRIPTION	REPORTED	CROSS-REFERENCE/ DIRECT ANSWER
G4-EN DMA	Disclosure of management approach	Fully	Pages 31-32
G4-EN1	Materials used by weight or volume	Fully	Page 32
G4-EN2	Percentage of materials used that are recycled input materials	Partially	Page 32
G4-EN3	Energy consumption within the organization	Fully	Pages 33-34
G4-EN4	Energy consumption outside of the organization	Fully	Page 35
G4-EN5	Energy intensity	Fully	Page 35
G4-EN6	Reduction of energy consumption	Partially	Page 36
G4-EN7	Reduction in energy requirements of products and services	Fully	Pages 36-38
G4-EN8	Total water withdrawal by source	Fully	Pages 38-39
G4-EN9	Water sources significantly affected by withdrawal of water	Fully	Pages 39-40
G4-EN10	Percentage and total volume of water recycled and reused	Partially	Page 41
G4-EN11	Operational sites owned, leased, managed in or adjacent to, protected areas and areas of high biodiversity value outside protected areas	Fully	Page 41
G4-EN12	Description of significant impacts of activities, products and services on biodiversity in protected areas and areas of high biodiversity value outside protected areas	Fully	Page 41
G4-EN13	Habitats protected or restored	Fully	Pages 41-42
G4-EN14	Total number of IUCN red list species and national conservation list species with habitats in areas affected by operations	Fully	Page 42
G4-EN15	Direct greenhouse gas emissions (Scope 1)	Fully	Page 42
G4-EN16	Direct greenhouse gas emissions (Scope 1)	Fully	Page 43
G4-EN17	Other indirect greenhouse gas emissions (Scope 3)	Fully	Pages 43-44

PROFILE DISCLOSURE	DESCRIPTION	REPORTED	CROSS-REFERENCE/ DIRECT ANSWER
G4-EN18	Greenhouse gas emissions intensity	Fully	Page 44
G4-EN19	Reduction of greenhouse gas emissions	Partially	Page 45
G4-EN20	Emissions of ozone-depleting substances	Partially	Page 45
G4-EN21	NOx, SOx and other significant air emissions	Fully	Page 46
G4-EN22	Total water discharge	Partially	Pages 47-48
G4-EN23	Total weight of waste	Fully	Pages 49-52
G4-EN24	Total number and volume of significant spills	Fully	Page 52
G4-EN25	Weight of hazardous waste transported, imported, exported, treated and shipped internationally	Fully	Page 52
G4-EN26	Biodiversity value of water bodies and related habitats significantly affected by the organization's discharges of water and runoff	Fully	Page 52
G4-EN27	Extent of impact mitigation of environmental impacts of products and services	Fully	2016 Corporate Sustainability Report Summary pages 32-34
G4-EN28	Percentage of products sold and their packaging materials that are reclaimed	Partially	Refer to EN2
G4-EN29	Monetary value of significant fines and total number of non-monetary sanctions for non-compliance with environmental laws and regulations	Fully	Page 53
G4-EN30	Significant environmental impacts of transporting products and other goods and materials for the organization's operations, and transporting members of the workforce	Fully	Refer to EN4 and EN17
G4-EN31	Total environmental protection expenditures and investments	Partially	Page 53
G4-EN32	Percentage of new suppliers screened using environmental criteria	Fully	Pages 53-54
G4-EN33	Significant actual and potential negative environmental impacts in the supply chain and actions taken	Fully	Pages 54-55
G4-EN34	Number of grievances about environmental impacts filed, addressed and resolved through formal grievance mechanisms	Fully	Page 55

### Social: Labor Practices and Decent Work

PROFILE DISCLOSURE	DESCRIPTION	REPORTED	CROSS-REFERENCE/ DIRECT ANSWER
G4-LA DMA	Disclosure of management approach	Fully	Pages 56-57
G4-LA1	Total new hires and employee termination by region and gender	Fully	Pages 58-59
G4-LA2	Benefits provided to full-time employees that are not provided to temporary or part-time employees	Partially	Page 60
G4-LA3	Return to work and retention rates after parental leave	Partially	Page 60
G4-LA4	Minimum notice periods regarding operational changes	Partially	Page 60
G4-LA5	Percentage of total workforce represented in formal joint management-worker health and safety committees that help monitor and advise on occupational health and safety programs	Unable to report	Data not available
G4-LA6	Type of injury and rates of injury, occupational diseases, lost days and absenteeism, and total number of work-related fatalities	Fully	Page 61
G4-LA7	Workers with high incidence or high risk of diseases related to their occupation	Fully	Page 62
G4-LA8	Health and safety topics covered in formal agreements with trade unions	Partially	Page 62
G4-LA9	Average hours of training per year per employee	Fully	Page 62
G4-LA10	Programs for skills management and lifelong learning that support the continued employability of employees and assist them in managing career endings	Fully	Page 63
G4-LA11	Percentage of employees receiving regular performance and career development reviews	Fully	Page 64
G4-LA12	Composition of governance bodies	Fully	Pages 65-67
G4-LA13	Ratio of basic salary and remuneration of women to men	Not reported	We do not report on disclosure because the information is proprietary
G4-LA14	Percentage of new suppliers screened using labor practices criteria	Fully	Page 68

PROFILE DISCLOSURE	DESCRIPTION	REPORTED	CROSS-REFERENCE/ DIRECT ANSWER
G4-LA15	Significant actual and potential negative impacts for labor practices in the supply chain and actions taken	Fully	Pages 69
G4-LA16	Number of grievances about labor practices filed, addressed and resolved through formal grievance mechanisms	Not reported	We do not report on this disclosure because the information is proprietary

### Social: Human Rights

PROFILE DISCLOSURE	DESCRIPTION	REPORTED	CROSS-REFERENCE/ DIRECT ANSWER
G4-HR DMA	Disclosure of management approach	Fully	Page 70
G4-HR1	Number and percentage of significant investment agreements and contracts that include human rights clauses or that underwent human rights screening	Unable to report	We do not have information to address this disclosure
G4-HR2	Total hours of employee training on human rights policies or procedures concerning aspects of human rights that are relevant to operations		
G4-HR3	Total number of incidents of discrimination	Not reported	We do not report on this disclosure because the information is proprietary
G4-HR4	Operations and suppliers identified in which the right to exercise freedom of association and collective bargaining may be violated or at significant risk	Partially	Page 71
G4-HR5	Operations and suppliers identified as having significant risk for incidents of child labor and measures taken to contribute to the abolition of child labor	Fully	Pages 71-72
G4-HR6	Operations and suppliers identified as having significant risks for incidents of forced or compulsory labor and measures to contribute to the elimination of all forms of forced or compulsory labor	Fully	Pages 72-73
G4-HR7	Percentage of security personnel trained in the organization's human rights policies or procedures that are relevant to operations	Fully	Page 73
G4-HR8	Total number of incidents of violations involving rights of indigenous peoples and actions taken	Not reported	We do not report this because the information is proprietary

PROFILE DISCLOSURE	DESCRIPTION	REPORTED	CROSS-REFERENCE/ DIRECT ANSWER
G4-HR9	Total number and percentage of operations that have been subject to human rights reviews or impact assessments	Fully	Pages 73-74
G4-HR10	Percentage of new suppliers screened using human rights criteria	Fully	Pages 74-75
G4-HR11	Significant actual and potential negative human rights impacts in the supply chain	Fully	Page 75
G4-HR12	Number of grievances about human rights impacts filed, addressed and resolved through formal grievance mechanisms	Not reported	We do not report on this disclosure because the information is proprietary

### Social: Society

PROFILE DISCLOSURE	DESCRIPTION	REPORTED	CROSS-REFERENCE/ DIRECT ANSWER
G4-SO DMA	Disclosure of management approach	Fully	Page 76
G4-S01	Percentage of operations with implemented local community engagement, impact assessments and development programs	Fully	Pages 77-80
G4-S02	Operations with significant actual and potential negative impacts on local communities	Fully	Page 80
G4-SO3	Total number and percentage of operation assessed for risks related to corruption and significant risks identified	Fully	Page 80
G4-S04	Communication and training on anti-corruption policies and procedures	Fully	Pages 80-81
G4-S05	Confirmed incidents of corruption and actions taken	Not reported	We do not report this because the information is proprietary
G4-S06	Total value of political contributions	Fully	Page 81
G4-S07	Total number of legal actions for anti-competitive behavior, anti-trust and monopoly practices and their outcomes	Fully	Page 81
G4-S08	Monetary value of significant fines and total number of non-monetary sanctions for noncompliance with laws and regulations	Fully	Page 81

PROFILE DISCLOSURE	DESCRIPTION	REPORTED	CROSS-REFERENCE/ DIRECT ANSWER
G4-S09	Percentage of new suppliers screened using criteria for impacts on society	Fully	Page 82
G4-S010	Significant actual and potential negative impacts on society in the supply chain and actions taken	Fully	Page 83
G4-S011	Number of grievances about impacts on society filed, addressed and resolved through formal grievance mechanisms	Not reported	We do not report this because the information is proprietary

### Social: Product Responsibility

PROFILE DISCLOSURE	DESCRIPTION	REPORTED	CROSS-REFERENCE/ DIRECT ANSWER
G4-PR DMA	Disclosure of management approach	Fully	Pages 84-85
G4-PR1	Percentage of significant product and service Fully categories for which health and safety impacts are assessed for improvement		Page 85
G4-PR2	Total number of incidents of non-compliance with regulations and voluntary codes concerning the health and safety impacts of products and services during their life cycle	Fully	Page 85
G4-PR3	Type of product and service information required by the organization's procedures for product and service information and labeling	Fully	Pages 85-86
G4-PR4	Total number of incidents of non-compliance with regulations and voluntary codes concerning product and service information and labeling	Fully	Page 86
G4-PR5	Results of surveys measuring customer satisfaction	Fully	Page 86
G4-PR6	Sale of banned or disputed products	Fully	Page 86
G4-PR7	Total number of incidents of non-compliance with regulations and voluntary codes concerning marketing communications	Fully	Page 87
G4-PR8	Total number of substantiated complaints regarding breaches of customer privacy and losses of customer data	Fully	Page 87
G4-PR9	Monetary value of significant fines for non-compliance with laws and regulations concerning the provision and use of products and services	Fully	Page 87

### MATERIALITY ASSESSMENT

### **OUR APPROACH**

At Ecolab, sustainability is core to our business strategy. We deliver sustainable solutions that help companies around the world achieve business results while minimizing environmental and social impact. The work we do matters, and the way we do it matters to our employees, customers, investors and the communities in which we and our customers operate.

We know that our greatest impact on the world is through the solutions we provide to our customers. Our most material risks and opportunities directly relate to our ability to help our customers operate sustainably. This approach to materiality aligns with our corporate strategy to address some of the world's most pressing and complex challenges through our own operations and the solutions we provide to our customers.

The parameters of our 2016 Corporate Sustainability Report and GRI Index have been established based on a strategic assessment of the issues that our stakeholders care most about, are of greatest relevance to our business strategy and impact our ability to deliver on our promise to make the world cleaner, safer and healthier.

### SUSTAINABILITY GOVERNANCE

Ecolab's sustainability strategy is governed by a Sustainability Executive Advisory Team (SEAT) made up of 10 members of the company's executive leadership. The SEAT meets with the Corporate Sustainability Team on a quarterly basis and is responsible for operationalizing sustainability across the company; coordinating and communicating company policy and decision-making related to sustainability; setting annual goals and metrics for key sustainability priorities; sustainability outlook assessment; and risk management.

### MATERIALITY AND RELEVANCE ASSESSMENT PROCESS

As a company, we employ a multifaceted process to determine material issues in order to align materiality with our company's and customers' key business drivers, and to inform our corporate strategy and reporting of these issues as required in our 10-K and GRI Index. Ecolab's annual enterprise "Assessment of Significant Business Risks" provides the foundation for assessing the materiality of issues to our business and our shareholders.

The annual enterprise "Assessment of Significant Business Risks" is conducted using a survey tool designed to identify strategic, operational, financial and compliance-related risks to the company. Risks are documented along with the likelihood and impact of their occurrence. An audit-services vice president manages the process, and the results are presented to the executive management team and Ecolab Board of Directors. The most significant business risks are reported publicly through the company's annual 10-K filing. These risks and opportunities did not change significantly from the previous reporting period.

In 2016 and through the beginning of 2017, we conducted a formal process to reassess issues of material significance and/or relevance to our stakeholders, specific to sustainability, to inform our corporate sustainability strategy and reporting activities. The scope of this work was designed to:

- 1. Update critical risk and opportunity drivers and issues across our businesses which may have changed over time
- 2. Evaluate the nature of potential impacts, the level of stakeholder concern and our ability to affect and/or manage these issues
- 3. Consider the Sustainability Accounting Standards Board's (SASB) provisional Chemical Industry's sustainability disclosure topics and metrics for alignment with our business and reporting activities
- 4. Differentiate between material and relevant topics for reporting in our financial and sustainability-focused reports
- **5**. Refresh the ranking and prioritization of topics of relevance to our stakeholders for management action and disclosure

## DIFFERENTIATING BETWEEN MATERIAL AND RELEVANT RISKS AND OPPORTUNITIES

Using the results of our "Assessment of Significant Business Risks" as a foundation, Ecolab evaluated the materiality of SASB topics to its business with a set of internal stakeholders from key segments across our business to determine the level of alignment with existing reporting coverage. Alignment was determined and differentiated using the SEC's definition of materiality<sup>1</sup> for inclusion in our 10-K and the GRI's definition of materiality, or relevance<sup>2</sup> as used in this report, for inclusion in our GRI Index.

""[Material issues are matters that] either individually or in the aggregate, are important to the fair representation of an entity's financial condition and operational performance ... [information that is] necessary for a reasonable investor to make informed investment decisions. "Presenting a substantial likelihood that the disclosure of the omitted fact would have been viewed by a reasonable investor as having substantially altered the total mix of information made available."

<sup>2</sup> "Relevant topics are those that may reasonably be considered important for reflecting the organization's economic, environmental and social impacts, or influencing the decisions of stakeholders, and, therefore, potentially merit inclusion in the report."

### SUSTAINABILITY ASPECTS MATERIAL AND RELEVANT TO ECOLAB

The assessment process resulted in a discrete set of aspects material to shareholders and a larger set of aspects relevant to stakeholders.

Aligned with disclosures in our 10-K and Annual Report, our three most material aspects are:

#### #1 ENVIRONMENTAL INNOVATION & PRODUCT STEWARDSHIP

Ecolab's Research, Development and Engineering scientists are at the front line of customer applications, developing solutions that improve water and energy management, increase operational efficiency, enhance safety and preserve natural resources.

Our product systems and services are designed with intention across sourcing, manufacturing, use and post-use; and around the core product stewardship principles of: Performance; Health and Safety; Environment; and Cost.

More information is reported on this topic in our Annual Report (pages 10 and 16) and within our GRI Index, specifically indicators EN2, EN7, EN27 and PR1-9.

#### #2 VALUE CREATION WITH CUSTOMERS

Over 25,000 Ecolab field representatives partner with customers globally to help them do more with less while achieving their business goals.

Fundamental to our approach is an understanding that real and lasting change is accelerated when economic and environmental benefits align. Our proprietary eROI<sup>SM</sup> value approach measures the exponential value of improved economic, operational and environmental impact of our solutions. With performance outcomes uncompromised, we credibly deliver and document this exponential value to our customers, helping them achieve ambitious business and environmental goals.

Measurement is a critical component of our process to deliver exponential outcomes. Using our eROI value approach, we measure our impact and quantify customers' return on investment.

More information is reported on this topic in our Annual Report (pages 7-8), within our GRI Index, specifically indicator EN7, and throughout our CSR, specifically in the Partnering section.

### #3 HUMAN CAPITAL MANAGEMENT

We are committed to a culture that fully leverages our employees' talents by promoting an environment where all people can make a difference, be heard, be supported, be developed and be rewarded for their contributions. We value the energy, ideas and ultimate success that diversity brings to our industry, our company and the global community we serve.

Ecolab takes our responsibility to our employees very seriously. We believe in compensating our employees fairly and in compliance with local laws. We promote the well-being of our employees, our customers and our customers' customers by contributing to programs and initiatives that enhance the quality of life in the communities where they work and live.

More information is reported on this topic in our Annual Report (page 15) and within our GRI Index, specifically indicators LA1-16 and HR1-12.

All aspects listed in the diagram below are deemed to be relevant to Ecolab and its stakeholders, with impacts within and outside our organization.

### LEADERSHIP & GOVERNANCE

- Climate Change-Related Policy & Strategy
   Antitrust, Bribery & Corruption
- Security, Privacy & Accessibility
  Public Policy

### HUMAN RESOURCES

- Employee Health & Safety
- Human Capital Managem
- Employee Diversity
- Employee Engagement & Wellness

### COMMUNITY IMPACT • Foundation & Philanthropy

Corporate Partnerships

### OPERATIONS & SUPPLY CHAIN

- Resource Scarcity Linked to Manufacturing
   Energy Use &
- Water withdrawal
   Adapting Operations to a Changing Climate
- Environmental Compliance in Operations
- Operational Health & Safety
- Waste & Effluent
- Sourcing & Supplier Engagement

### PRODUCTS, SERVICES & R&D INNOVATIONS

- Customer Requirements & Global Regulatory Product Environmental Compliance Product LCA &
- Value Creation with Customers Sustainable Packaging

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### STAKEHOLDER ENGAGEMENT

In order to garner a comprehensive understanding of risks and opportunities, we engage in an ongoing dialogue with a diverse set of stakeholders to assess the relevance of sustainability-specific issues. Our annual stakeholder-engagement process includes employees, customers, investors and relevant external groups.

### Employees

We strive to make Ecolab a place where talented and capable people are inspired, motivated and fully engaged in their work. Our associates drive innovation, support business growth and provide personally delivered service and on-the-ground support at more than 1 million customer locations. The perspectives of our associates are critical to our success and inform our business strategy.

Our annual Assessment of Significant Business Risks process includes interviews and surveys of leadership across business units and functions, including:

- Operation heads across businesses
- Human resources
- Supply chain and procurement
- Research, Development and Engineering (RD&E) and product development
- Marketing
- Finance, risk, legal and regulatory affairs

### Customers

Our relationships with many of the world's biggest brands give us a unique opportunity to understand the risks and opportunities facing a wide range of industries all around the world. We learn from our customers – the challenges they face and the results they desire – and we use this knowledge to drive innovation and help them achieve their business and sustainability goals. What matters to our customers, matters to us. In addition to our daily interactions, we employed the following strategies to inform customer-specific risks and opportunities in 2016:

- Annual enterprise business reviews: Every year, we conduct a thorough review of our partnerships with each customer to measure our impact over the past year and assess key business drivers to shape future strategies.
- Active participation in industry organizations, including the Food Marketing Institute, National Restaurant Association, Grocery Manufacturers Association, Consumer Specialty Products Association, AISE, Association for Iron and Steel Technology (AISTech), American Cleaning Institute, Corporate Eco Forum, National Association of Manufacturers, Sustainable Purchasing Leadership Council, Steel Manufacturers Association, National Association for Environmental Management, Consumer Goods Forum and International Tourism Partnership.

### Investment Community

As a publicly traded company, we place a priority on the opinions of our shareholders. We engage in dialogue with our stakeholders each year at our annual shareholder meeting.

### Society

Our ability to provide and protect clean water, safe food, abundant energy and healthy environments is strengthened through our partnerships with reputable global NGOs. Through these partnerships, we strengthen our understanding of global trends impacting our business, customers and communities around the world. In 2016, we actively engaged with relevant organizations, and these partnerships influenced our assessment of our company's risks and opportunities related to society.

Our NGO partnerships in 2016 included the UN Global Compact and CEO Water Mandate, Alliance for Water Stewardship, The Nature Conservancy, The Project WET Foundation, World Resources Institute, Corporate Executive Board and the Sustainability Consortium.

### **ONGOING ASSESSMENT**

The risks and opportunities we face are constantly evolving. Accordingly, Ecolab will refresh its materiality and relevance assessment process and findings on a biannual basis, seeking to balance gathering input and engagement from internal stakeholders and the broader community.

### **ADJUSTMENTS**

Ecolab developed an inventory of greenhouse gas (GHG) emissions as part of our commitment to reducing our carbon footprint in 2007. In 2009, we expanded the primary inventory to include our other key operational environmental impacts of water used, wastewater discharged and waste disposed. During completion of 2016 inventories, we identified changes that impacted historical inventories resulting in a restating of our 2015 baseline to measure progress against our corporate goals.

Throughout 2016, data gaps were identified and corrected, which impacted historical inventories for each metric reported. We also continue to implement many new data-management collection processes to maintain our energy and water invoices for all owned and operationally controlled fixed facilities. This serves as another way to perform internal and third-party auditing of this data.

Globally, Ecolab had a 76 percent invoice-compliance rate in 2015, meaning that 76 percent of all energy and water invoices from all owned and operationally controlled fixed facilities were used to compile 2015 data.

Net sales are adjusted to constant 2015 dollars to factor out inflation when normalizing Ecolab's emissions performance against the baseline year, following best-practices guidance from the GHG Protocol and EPA Climate Leaders. Ecolab's net sales are adjusted for inflation using Producer Price Indexes (PPI) from the Bureau of Labor Statistics.

Ecolab has had its 2016 global Scope 1, 2 and 3 (United States and Europe business travel only) GHG emissions and global water consumption verified by a third party using the ISO 14064-3: Greenhouse Gases – Part 3 specification standard and the International Standard on Assurance Engagements (ISAE) 3000 for water consumption.

### **GREENHOUSE GAS INVENTORY CHANGES**

- Data gaps were identified and adjusted in the 2015 inventory, which will impact previously reported summary data. This includes historical real estate data for global leased and owned locations. This was updated to correct inaccurate/revised building-area and building-type information. This primarily affected operationally controlled sites where energy use and subsequent emissions were previously estimated.
- We have included calculation of "market-based" Scope 2 emissions as well as "location-based" Scope 2 emissions as per the revised GHG Protocol guidance. At this stage, this involves using the residual mix factors for Europe as published by RE-DISS. This will be extended to other regions when reliable residual mix emission factors are published. One of our sites purchases RECs; this is accounted for in the "market-based" Scope 2 emissions.
- One of our sites now uses on-site renewable energy. This has been accounted for as 0 emissions in our inventory.
- Prior to the 2011 Ecolab-Nalco merger, Legacy Nalco light fleet drivers were included in a Personal Vehicle Allowance (PVA) program that allowed drivers to use their personal vehicles for business use and get reimbursed by the company. In 2012, the company began converting those drivers to the Ecolab Fleet Program, with a goal completion date of 2016. By the end of

2015, 1,666 Legacy Nalco drivers had been converted. Since the PVA program contributed to Scope 3 emissions and the Ecolab Fleet Program contributes to scope 1 emissions, a baseline adjustment was completed.

### WATER, WASTEWATER AND WASTE INVENTORY CHANGES

Data gaps and corrections that impact 2015 summary data were identified during completion of the 2016 water, wastewater and waste inventory:

• The historical real estate data for global leased and owned locations was updated to correct for inaccurate building-area and building-type information. This primarily affected operationally controlled sites where water, waste and effluent were estimated.

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### G4 GENERAL STANDARD DISCLOSURES (G4-4, G4-6, 7, 8) ALL FROM THE 2016 ANNUAL REPORT AND 10K FORM

### **DESCRIPTION OF KEY IMPACTS, RISKS AND OPPORTUNITIES (G4-2)**

Ecolab has a rigorous process of analyzing risks and opportunities related to social factors from employee engagement to human rights across business operations and our value chain. A comprehensive review, "Assessment of Significant Business Risks," is conducted using a survey tool designed to identify strategic, operational, financial and compliance-related risks to the company. Risks are documented along with the likelihood and impact of their occurrence each year. The results are presented to the Ecolab board of directors. Our chairman of the board and CEO is responsible for appropriate strategy adjustments.

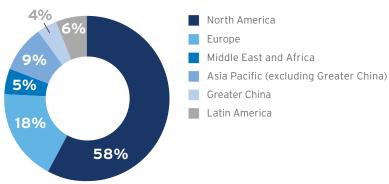
The most significant business risks are reported publicly through the company's annual 10-K filing, and specific business risks and opportunities are disclosed herein. The various indicators that we measure and report on in our annual Corporate Sustainability Report are material to our success. In addition, the principles of our company (available on our website: <u>www.ecolab.com</u>) reflect how we conduct business on a daily basis with a focus on economic, environmental, safety and social areas.

Also see Ecolab's CDP submission sections 2, 5 and 6.

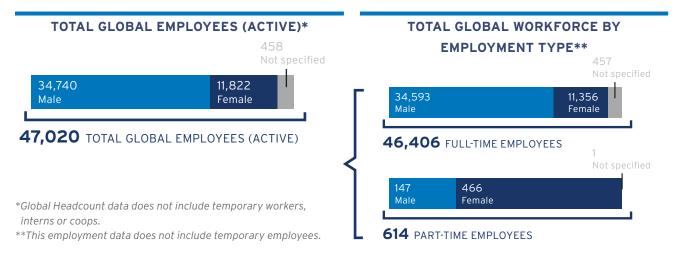
### **SCALE OF ORGANIZATION (G4-9)**

#### Total headcount, 2016: 47,565 (Annual Report) Revenue, 2016: \$13.15 billion (Net Sales)

### SALES AND REVENUES BY REGIONS THAT MAKE UP 4 PERCENT OR MORE OF TOTAL REVENUES:



### TOTAL NUMBER OF EMPLOYEES (G4-10)

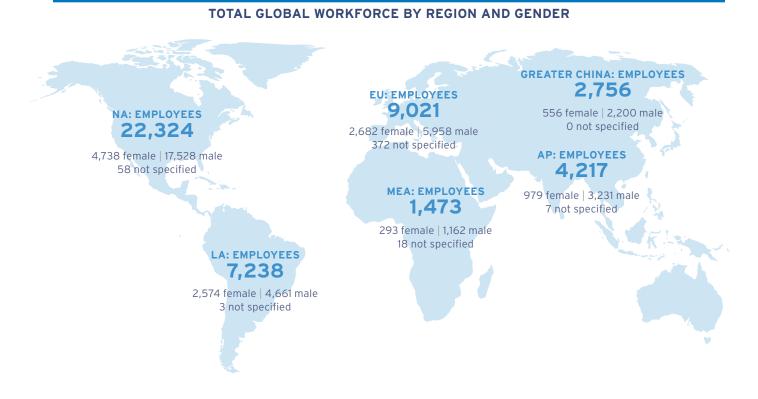


TOTAL GLOBAL EMPLOYEES AND SUPERVISED WORKERS BY GENDER



\*Minus Governance Body Employees.

### TOTAL NUMBER OF EMPLOYEES (G4-10) (CONTINUED)



### Ecolab does not have a substantial or materially significant portion of its workforce legally recognized as self-employed. Ecolab does not see a materially significant variation in its employee workforce.

### PERCENTAGE OF TOTAL EMPLOYEES COVERED BY COLLECTIVE BARGAINING AGREEMENTS (G4-11)

Ecolab recognizes an employee's right to form or join unions. However, we encourage them to make an informed decision on the matter. Where employees have chosen to be represented by a labor union, we fulfill our bargaining obligations as defined by the law. Only a small percentage of our employees are currently covered under trade unions or collective-bargaining agreements.

In the United States, 470 employees are covered by collective-bargaining agreements. This is approximately 2.25 percent of United States employees.

### **DESCRIPTION OF THE ORGANIZATION'S SUPPLY CHAIN (G4-12)**

Ecolab operates an extensive, integrated global supply chain. Our manufacturing operations and supplier base serve the needs of customers across 170 countries. The company procures more than \$4.4 billion of direct raw material, contracts manufacturing and equipment from more than 12,000 suppliers worldwide and manages distribution through various channels to external customers across 1.3 million locations.

## SIGNIFICANT CHANGES DURING THE REPORTING PERIOD REGARDING THE ORGANIZATION'S SIZE, STRUCTURE, OWNERSHIP OR SUPPLY CHAIN (G4-13)

We continued to pursue opportunities to grow key areas of our business through acquisition. During 2016, Ecolab made further investments to bolster our product and service offerings and market footprint. Below is a summary of significant 2016 changes:

- In July 2016, Ecolab made a 33 percent minority investment in Aquatech. Based in Canonsburg, Pennsylvania, Aquatech is a global leader in the design and engineering of complex and comprehensive water treatment solutions that improve water quality and reduce net water usage. The Company determined that it exerts significant influence, but less than controlling interest, over Aquatech and therefore has accounted for the investment using the equity method of accounting.
- In 2016, Ecolab acquired certain assets of Keedak Limited, an oilfield chemical distributor in Nigeria, which became part of the Company's Global Energy segment.
- In October 2016, Ecolab sold the restroom cleaning business initially acquired through the November 2015 Swisher acquisition.

## WHETHER AND HOW THE PRECAUTIONARY APPROACH OR PRINCIPLE IS ADDRESSED BY THE ORGANIZATION (G4-14)

Ecolab identifies hazards, risks and impacts of our products through multiple mechanisms. For select products, we conduct testing to identify pertinent hazards. In instances where testing is not feasible, we follow applicable regulatory requirements and recommendations to identify and assign classifications.

This approach is based on identifying pertinent hazards of our products' ingredients which are then used to identify product hazards. We follow the Globally Harmonized System of Classification and Labeling of Chemicals (GHS) criteria for classifying our ingredients and products. In order to thoroughly assess our ingredients, we review publicly available information from reputable sources such as the United States Environmental Protection Agency (EPA), United States Agency for Toxic Substance and Disease Registry (ATSDR), World Health Organization (WHO) and European Chemicals Agency (ECHA).

We obtain proprietary information from our chemical ingredient suppliers to enable proper handling and classification of our materials and products. Additionally, we carefully evaluate all of the substance comprising the raw materials in our portfolio. Since 2012, we have evaluated more than 2,205 substances using GHS criteria and these evaluations have resulted in our products having technically robust classifications. Our product risks are evaluated by multiple groups within Ecolab, including Toxicology, Industrial Hygiene, Sustainability, Transportation and Package Engineering. If risks are identified, appropriate mitigation measures are implemented. Finally, we use customer feedback to continuously assess our products. Customer feedback includes direct feedback from field representatives' interactions with customers and customer input received from our technical call centers and third-party health and safety call centers.

### EXTERNALLY DEVELOPED ECONOMIC, ENVIRONMENTAL AND SOCIAL CHARTERS, PRINCIPLES OR OTHER INITIATIVES TO WHICH THE ORGANIZATION SUBSCRIBES OR THAT IT ENDORSES (G4-15)

Ecolab subscribes to or endorses externally developed economic, environmental and social charters/principles, including the following:

- UN Global Compact and CEO Water Mandate: Ecolab became a signatory in 2012.
- CDP: Ecolab has participated in and reported to CDP since 2006.
- Alliance for Water Stewardship (AWS): Since 2010, Ecolab has partnered with WWF and AWS to develop and launch the International Water Stewardship Standard. Ecolab is a founding partner of the AWS Standard.
- The Nature Conservancy: In 2015, Ecolab, through the Ecolab Foundation, made a \$2 million pledge to support The Nature Conservancy's Securing and Restoring Water Sources Around the Globe initiative.
- Other notable associations we support include: International Organization for Standardization (ISO), American Cleaning Institute (ACI), National Association of Manufacturers and Sustainable Purchasing Leadership Council.

### LIST OF MEMBERSHIPS IN ASSOCIATIONS AND NATIONAL OR INTERNATIONAL ADVOCACY ORGANIZATIONS IN WHICH THE ORGANIZATION IS ENGAGED (G4-16)

Industry and policy groups have a unique ability to influence standards, regulations and practices. Ecolab engages with a broad range of industry groups, sharing expertise and insights to help these membership organizations enhance sustainability leadership across their respective industries. In 2016, Ecolab actively participated in sustainability-related work groups within the following industry associations or groups: AISE, American Chemistry Council, American Cleaning Institute, American Hotel & Lodging Association, Beverage Industry Environmental Roundtable, Consumer Goods Forum, Consumer Specialty Products Association, Council of Great Lakes Industries, Food Marketing Institute, Grocery Manufacturers Association, Global Food Safety Initiative, National Association for Environmental Management, National Association of Manufacturers, National Restaurant Association, Steel Manufacturers Association, Sustainable Purchasing Leadership Council, United States Council for International Business and World Travel and Tourism Council.

### KEY TOPICS AND CONCERNS THAT HAVE BEEN RAISED THROUGH STAKEHOLDER ENGAGEMENT AND HOW THE ORGANIZATION HAS RESPONDED TO THOSE KEY TOPICS AND CONCERNS (G4-27)

Refer to Materiality Narrative. Ecolab's key stakeholders include its customers, investors, community organizations (including NGOs and partners) and employees. Key topics and concerns consistently raised by these stakeholder groups are represented in our Materiality diagram, and correspondingly are addressed throughout our 2016 Corporate Sustainability Report.

### **EXTERNAL ASSURANCE (G4-33)**

Ecolab has completed third-party verification by Bureau Veritas North America (BVNA) of its publicly reported 2016 Corporate Sustainability Report. BVNA completed its Limited Assurance level evaluation of the Report in accordance with the International Standard on Assurance Engagements 3000 and against the principles of the Global Reporting Initiative (GRI) Reporting Framework as defined in the GRI G4 Sustainability Reporting Guidelines. The assurance practitioners selected for this engagement were gualified to perform the services and were impartial and independent from the management systems and reports being audited. On the basis of our methodology and the activities described above, BVNA has found no evidence that: the information and data included in the Report are not accurate, reliable and free from significant error, material mistakes or misstatements; the Report is not a fair representation of Ecolab's activities over the reporting period; the information is not presented in a clear and understandable manner, and allows readers to form a balanced opinion regarding Ecolab's performance and position during the 2016 reporting period; the Report has not been prepared in accordance with the GRI G4 Guidelines and includes appropriate consideration of the profile disclosures, management approach disclosures and performance indicators to meet the requirements of GRI G4 Core Requirements. It is BVNA's opinion that: Ecolab has established appropriate systems for the collection, aggregation and analysis of relevant information, and has implemented underlying internal assurance practices that provide a reasonable degree of confidence that such information is complete and accurate; and Ecolab's executive management supports the development of processes for the embedding of sustainable management concepts and practices in the company.

### **GOVERNANCE STRUCTURE OF THE ORGANIZATION (G4-34)**

For detailed corporate governance information, refer to Ecolab's 2016 Annual Report and Form 10-K.

While the full board of directors monitors the company's progress regarding sustainability, including climate change, the Safety, Health, Environment and Sustainability Committee has the highest level of direct responsibility for sustainability matters, including environmental and social impacts and those relating to climate change. The board of directors receives a presentation from this committee annually on the company's progress regarding its sustainability goals, which include climate-change impacts as appropriate. The committee members are appointed by the board and are comprised of no fewer than three directors. The primary responsibility for assuring the corporation's compliance with applicable safety, health and environmental (SHE) laws and regulations is vested in management of the corporation. In order to monitor such compliance, the board has established the committee. The committee is appointed by the board to review and oversee the corporation's SHE policies, programs and practices that affect, or could affect, the corporation's employees, customers, stockholders and neighboring communities.

Ecolab's sustainability strategy (which includes environmental, social and governance components) is governed by a Sustainability Executive Advisory Team (SEAT) that is made up of 10 members of the company's executive leadership team. The SEAT meets with the Corporate Sustainability Team (comprised of research and development, communication, marketing and supply chain) on a quarterly basis and is responsible for operationalizing sustainable business practices and polices across the company; coordinating and communicating policy and decision-making related to sustainability; setting goals and metrics for key sustainability priorities; and assessing sustainability outlook and risk management.

### THE ORGANIZATION'S VALUES, PRINCIPLES, STANDARDS AND NORMS OF BEHAVIOR (G4-56)

### Values

### THE WORK WE DO MATTERS

- We make the world cleaner, safer and healthier.
- We protect vital resources. Ensure water and energy are available everywhere.
- Our products and services prevent disease and infection. Keep food supplies safe. Protect the places where people eat, sleep, work, play and heal.
- We touch what is fundamental to quality of life: We keep people healthy. We enhance well-being. We provide assurance, so life can be lived fully.
- We help our customers succeed. Reduce risk and worry. Free them to grow.

### HOW WE WORK MATTERS, TOO

- We work with purpose. When there's a goal, we reach it. When there's a problem, we solve it.
- We work safely. Take care in all we do.
- We strive to do what's right, what's fair, what's honest.
- We take action together. In teams. Teams made stronger by diverse perspectives.
- We find inspiration and energy in what we do and how we do it. In growing, learning and celebrating together. In making a difference and serving the greater good.

### **Principles**

**ECONOMIC:** Drive economic growth for our customers, employees, shareholders and communities. **ENVIRONMENTAL:** Promote stewardship of natural resources and protect the environment. **SAFETY:** Ensure safe processes that protect our employees, contractors, customers and communities. **SOCIAL:** Enhance the well-being of people and communities.

### Code of Conduct

Ecolab adopted its initial Code of Conduct policy in 1976. The policy was last amended on November 29, 2012. The Code of Conduct applies to all Ecolab officers, directors and employees. Ecolab intends to promptly disclose on our website should there be any further amendments to, or waivers by the board of directors of, the Code of Conduct.

All Ecolab employees and board members receive Code of Conduct training during their onboarding program and are required to complete an online refresher course on an annual basis. The Code of Conduct is re-signed by employees as part of the annual training process. The Code of Conduct is available in 20 languages.

The excellent reputation Ecolab enjoys is one of its greatest assets. It provides a solid foundation upon which to build trust with our customers and communities.

Our Code of Conduct serves as a guide for how to act and make decisions as an employee of Ecolab.

Each employee is responsible for demonstrating the company's values and following its Code of Conduct. How we work really does matter – to our coworkers, customers and communities.

### DISCLOSURE OF MANAGEMENT APPROACH

Refer to Ecolab's 2016 Annual Report and Form 10-K.

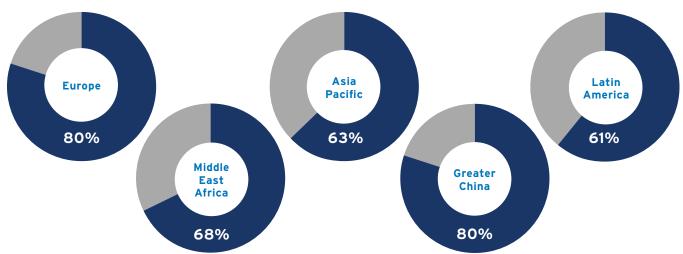
### FINANCIAL ASSISTANCE RECEIVED FROM GOVERNMENT (G4-EC4)

In 2016, Ecolab received nominal monetary support, awards, tax reliefs or subsidies directly from the government. We received federal and state tax credits in the United States to support our research and development initiatives and work opportunity credits totaling \$19,096,038 (R&D and WOTC credits received in 2016 related to 2015 tax returns). Ecolab also received a federal fuel credit totaling \$548,149.

Ecolab received a Dominican Republic tax holiday of \$5,800,000 in 2016 (valued benefit equals the difference in the statutory tax rate applied to Ecolab's income for 2016 compared to the zero tax paid). The Chinese government allows preferential income rate reduction for technology companies, and as a result, Ecolab is anticipating a tax reduction of \$380,000 for 2016 (2,540,600 CNY). Similarly, the Singapore government allows a reduced income tax rate on certain income for which Ecolab anticipates a tax reduction of \$250,000 in 2016. Anticipated tax deductions by the Australian government for R&D expenditures in Australia will total approximately AUD \$511,825 for 2016.

## RATIO OF STANDARD ENTRY-LEVEL WAGE BY GENDER COMPARED TO LOCAL MINIMUM WAGE AT SIGNIFICANT LOCATIONS OF OPERATIONS (G4-EC5)

At Ecolab we require a variety of high-demand, unique vocational and technical skills in entry-level roles. Consequently, our entry-level wages are on average two to three times higher than minimum wage regardless of gender across our significant locations of operation.



### PROPORTION OF SENIOR MANAGEMENT HIRED FROM THE LOCAL COMMUNITY AT SIGNIFICANT LOCATIONS OF OPERATION (G4-EC6)

Senior management is defined as N-2 levels in the regions in which we operate (positions directly report to regional leader).

Local community is defined as the major regions outside of the United States in which we operate: Europe, Latin America, Greater China, Asia Pacific and Middle East/Africa. Significant locations of operations are defined as our manufacturing facilities and operation centers.

### DEVELOPMENT AND IMPACT OF INFRASTRUCTURE INVESTMENTS AND SERVICES SUPPORTED (G4-EC7)

Ecolab built a new Global Energy Services Headquarters in Sugar Land, Texas, which opened in April 2016. Architects designed the 133,000-square-foot building as a modern work space and training facility to accommodate approximately 1,000 Nalco Champion employees. A few of the sustainability features include:

- Efficient, low-energy T-8 Fluorescent and LED light fixtures throughout the headquarters.
- A lighting control system which illuminates areas on a schedule with anticipated occupation, with local override. This allows energy savings on days with different levels of staff and utilizing natural light and providing a better quality work environment on sunny/bright days.
- Water closets and urinals include water-efficient, low-flow flush valves to reduce water consumption. Sinks utilize sensors to reduce water use.
- For heating and cooling, the building utilizes variable air volume, allowing fans on the roofmounted air units to cycle as demand is called for by occupied areas of the building in order to meet the building set-point temperature. This allows for heating and cooling only in the areas where it's needed, limiting hot or cool spots.
- The building shell has high-level R-value walls and a roof to help reduce heat load. The glass has a high-performance coating additionally reducing the heat gain and the need for air conditioning.
- Perforated shades will be added to reduce glare and building heat load.

### SIGNIFICANT INDIRECT ECONOMIC IMPACTS (G4-EC8)

Ecolab solutions improve the productivity of organizations and reduce environmental impacts on communities around the world where people live and work. Every day, we help make the world cleaner, safer and healthier. Our products and services help companies across dozens of industries operate more efficiently, delivering better results at lower total costs of operations. With solutions that enable customers to produce more products and services using fewer natural resources, Ecolab helps customers meet business goals, conserving limited water and energy resources and minimizing waste and emissions. Specific examples of the impact we have on the operational productivity and sustainability of companies throughout the value chain – from raw material and ingredient processing to production and manufacturing to services delivery – are highlighted in our 2016 Corporate Sustainability Report Summary on pages 8-19 (the report is available at <u>www.ecolab.com/sustainability</u>).

## **PROPORTION OF SPENDING ON LOCAL SUPPLIERS AT SIGNIFICANT LOCATIONS OF OPERATION (G4-EC9)**

We do not have a specific proportion of budget spend on local suppliers within each region, but fundamentally, we choose to buy from suppliers within the regions in which we operate that abide by the ethical and sustainability goals set forth by our company (posted on <u>www.ecolab.com</u>). We base our purchasing decisions on safety, quality, service and price, opting to purchase within the region whenever possible to minimize shipping of materials overseas. More than 90 percent of our purchases are from suppliers within our regions.

Ecolab also has expanded its efforts to engage small and diverse local companies via their membership in diversity organizations such as the National Minority Supplier Development Council (NMSDC). Ecolab's corporate headquarters in St. Paul has engaged in supplier diversity events, participated in supplier fairs and coordinated efforts with other large corporations via a Twin Cities Diversity Corporate Round Table. Ecolab utilizes a similar approach in their larger regional markets as well. "Local" is defined with regard to the major regions in which we operate: North America, Europe, Latin America, Asia Pacific, Greater China and Middle East/Africa. Significant locations of operations are defined as our manufacturing facilities and operation centers.

### G4 SPECIFIC STANDARD DISCLOSURES: ENVIRONMENTAL

Sustainability is core to our purpose at Ecolab. Stewardship of natural resources is an integral part of our operational and business strategy, from the way we run our plants and facilities to the products we develop and the way we serve our customers.

We have a history of strong environmental performance and have made significant strides in recent years to reduce our environmental impact.

### **Committed to Continuous Improvement**

Our environmental performance achievements are the result of enterprise and facility-level commitments to increasing the efficiency of our operations through actions and investments that result in greater environmental stewardship.

Through our Create and Maintain Value program, we employ our expertise and technology to continually find more ways to deliver strong business results while saving water, energy and wastewater and prolonging equipment life throughout our facilities. We do this with an eye for how our impact extends beyond our operations to local people and communities.

In 2016, we completed 29 process improvement projects that delivered resource reduction outcomes across our global footprint. For example:

- Our Fresno, Texas, plant increased its condensate return, saving 60,000 therms of natural gas and more than 12,000 gallons of water use per day. (\$1,000,000 cost savings)
- Our Montgomery, Alabama, plant installed new high-speed doors in its warehouse which resulted in more than 155,000 kWh in electricity savings. (\$18,000 cost savings)
- Our Texarkana, Texas, plant began recycling non-contact cooling water for other production use, resulting in water and effluent savings of 84,000 gallons per month. (\$50,000 business risk avoidance savings)
- Our Mosta, Malta, plant installed 468 photovoltaic panels on its roof, which produced 45 percent of the plant's total electricity needs for the year. This resulted in a carbon intensity reduction of approximately 190 MT CO<sub>2</sub>e generated.
- Our Lerma, Mexico, plant implemented a number of water reduction projects, including recovering rainwater and sending rejected condensate water to its fire water pond, reducing the plant's water needs by 7 percent annually. (\$5,000 cost savings)
- Our Yangsan, South Korea, plant began using spray foam chemistry to washout vessels, saving 3,500 kWh of electricity, 2,600 therms of natural gas and nearly 1 million gallons of water. (\$39,000 cost savings)

### DISCLOSURE OF MANAGEMENT APPROACH (G4-EN DMA)

The following Disclosure of Management Approach covers environmental aspects material to Ecolab as disclosed in this report.

### Commitments

Our sustainability leadership is rooted in our enterprise-wide commitment to operational efficiency and environmental stewardship. We operate with respect for the environment and promote stewardship of natural resources from the way we run our plants and facilities to the products we develop and the way we serve our customers.

We have a history of strong environmental performance and have made significant strides in recent years to reduce our environmental impact. As our company grows, entering new industries and geographies, minimizing the impact of our own operations is increasingly important.

### Goals, Targets and Evaluation

In 2015, we reevaluated our footprint and made great strides to institutionalize practices that will enable us to deliver greater efficiencies throughout our operations while meeting increasing demand for our solutions and services. In 2016, we continued to make progress toward our goals with incremental reductions in water and energy use across our global manufacturing facilities.

As we look to 2020 and our ability to help customers do even more with less, we will also hold ourselves to higher environmental standards. The sustainability goals introduced in 2015 align with our business strategy and aim to further reduce our environmental impact as we expand our capacity to meet growing customer needs. Using the company's 2015 metrics as an operational baseline, we aim to achieve a 25 percent reduction in water use and a 10 percent reduction in greenhouse gas (GHG) emissions, measured by intensity per million dollars in sales.

We are proud of the improvements we have made in the past year and are excited to continue on an intentional path that will further our leadership as a responsible global enterprise.

### Policies

Ecolab's Global Safety Health & Environmental Position: <u>www.ecolab.com/sustainability/committed-to-safety-and-health/</u>

Our Water Stewardship position formalizes our global commitment to undertake responsible water stewardship by identifying opportunities for our company and our customers to use water resources in a manner that benefits business, communities and nature: www.ecolab.com/~/media/Ecolab/Ecolab%20Home/Documents/DocumentLibrary/ PositionStatements/WaterStewardshipPosition.ashx

### Responsibilities

Ecolab's sustainability strategy is governed by a Sustainability Executive Advisory Team (SEAT) made up of 10 members of the company's executive leadership. SEAT meets with the Corporate Sustainability Team on a quarterly basis and is responsible for operationalizing sustainability across the company; coordinating and communicating company policy and decision-making related to sustainability; setting annual goals and metrics for key sustainability priorities; sustainability outlook assessment; and risk management.

#### 2016 ENVIRONMENTAL PERFORMANCE

- GHG Emissions\*: +0.6% per \$MM sales, from 2015 baseline
- Water Consumption: +1.8% per \$MM sales, from 2015 baseline
- \* For GHG emissions reported performance, Ecolab uses the location-based method to calculate and report its Scope 2 emissions.

### MATERIALS USED BY WEIGHT OR VOLUME (G4-EN1)

	Units	2014	2015	2016
Raw Material Used (nonrenewable)	Metric Tons (MT)	2,534,136	2,404,401	2,314,535

The scope of raw material data is limited to global supply-chain manufacturing facilities.

## PERCENTAGE OF MATERIALS USED THAT ARE RECYCLED INPUT MATERIALS (G4-EN2)

	Units	2014	2015	2016*
Total Recycled Input Materials in Packaging	MT	1,262	1,530	3,023
Total Packaging Used	MT	7,211	11,126	20,332
Percentage of Recycled Material Used in Packaging	МТ	17.5%	13.8%	14.9%

\* The scope of 2016 data has been expanded to include Legacy Champion. Prior year data only includes Legacy Nalco.

	Units	2014	2015	2016
Reconditioned Drums Purchased	MT	1,620	1,189	1,770
Reconditioned IBCs Purchased	МТ	-	-	165

Ecolab purchases reconditioned drums to avoid the use of virgin plastic. The scope of reconditioned drum and Intermediate Bulk Container (IBC) data is global Legacy Ecolab. We are unable to provide consistent reconditioned IBC purchase data prior to 2016.

### **ENERGY CONSUMPTION WITHIN THE ORGANIZATION (G4-EN3)**

### DIRECT ENERGY CONSUMED BY SOURCE

	Units	2015	2016
Biodiesel	GJ	1	0
Diesel	GJ	957,582	871,750
Distillate Fuel Oil (#1, 2, 4)	GJ	93,342	90,684
Ethanol	GJ	38,770	14,560
Gasoline	GJ	2,263,521	2,280,014
LNG	GJ	1	2
LPG	GJ	46,258	41,279
Natural Gas	GJ	3,186,388	3,325,469
Residual Fuel Oil (#5 & 6)	GJ	3,188	3,086
Towngas	GJ	18	36

### INDIRECT ENERGY CONSUMED BY SOURCE

	Units	2015	2016
Electricity	GJ	1,630,636	1,605,299
Purchased Chilled Water	GJ	12,325	14,123
Purchased Hot Water	GJ	52,235	56,035
Steam	GJ	352,078	389,032

### ELECTRICITY SOLD

	Units	2015	2016
Electricity Sold	GJ	3,041	5,122

Our Legacy Nalco Water headquarters/RD&E facility in Naperville, Illinois, has an onsite tri-generation facility that produces the majority of the electricity used by the facility and all of the chilled water and steam used for cooling and heating the building. Any unused electricity is sold back to the grid.

### ENERGY CONSUMPTION WITHIN THE ORGANIZATION (G4-EN3) (CONTINUED)

### ENERGY USE BY REGION

	Units	2015	2016
AP	GJ	804,596	795,654
EMEA	GJ	1,111,374	1,141,999
LA	GJ	324,091	391,084
NA	GJ	6,396,284	6,363,118
Global	GJ	8,636,345	8,691,855

### ELECTRICITY USE BY REGION

	Units	2015	2016
AP	GJ	242,922	219,232
EMEA	GJ	260,517	260,872
LA	GJ	110,977	122,847
NA	GJ	1,016,220	1,002,836
Global	GJ	1,630,636	1,605,787

United States Environmental Protection Agency Climate Leaders conversion factors were used.

### **ENERGY CONSUMPTION OUTSIDE THE ORGANIZATION (G4-EN4)**

### **DIRECT ENERGY CONSUMED BY SOURCE (2016)**

SOURCES OF SCOPE 3 EMISSIONS	METRIC TONNES CO <sub>2</sub> e	METHODOLOGY
Fuel and Energy Related Activities	131,271	Upstream emissions from purchased fuels, electricity, steam and hot and chilled water include generation and T&D emissions, and any other losses in this category. Data quality is considered to be consistent with inputs from our global database on sustainability metrics. Upstream emissions of purchased electricity are calculated for the US and other countries by multiplying electricity activity data by country- or region-specific emission factors from UK Defra 2014 Guidelines for GHG Reporting. Upstream emissions from purchased fuels, steam, hot and chilled water are calculated using emissions factors from UK Defra 2014 Guidelines for GHG Reporting. Emissions associated with losses were calculated for the US and other countries by multiplying the energy use by type by emission factors from UK Defra 2014 Guidelines for GHG Reporting. All GWPs are from the IPCC Second Assessment Report in line with the Kyoto Protocol.

### **ENERGY INTENSITY (G4-EN5)**

	Units	2015	2016
Energy Intensity (within the organization)	GJ/\$M	638	655

All energy use within the organization is included.

	Units	2015	2016
Ratio Denominator - Global Sales	\$M (adjusted)	13,545	13,269

Fixed currency USD. Sales figures represented are globally adjusted for inflation using the Producer Price Index. This ratio denominator was used for all intensities shown for GRI-EN indicators and is used for our corporate operational goal reporting.



### **REDUCTION OF ENERGY CONSUMPTION (G4-EN6)**

Global	kWh	2,777,124
NA	kWh	1,941,857
LA	kWh	53,200
EMEA	kWh	698,265
АР	kWh	83,802
	Units	2016

The scope of reduction of energy consumption data is global supply chain manufacturing facilities that reported energy efficiency projects. Energy savings represent a combination of direct measurements and estimations using best-practices methodologies, as reported.

### **REDUCTION IN ENERGY REQUIREMENTS OF PRODUCTS AND SERVICES (G4-EN7)**

Many of Ecolab's innovative products and services help customers reduce energy use. The benchmark for comparison for each application listed in this section is the historic performance of the technology that was replaced in the year the product was launched. Methodologies are described separately for each application. Examples of the positive impacts of our products and services in 2016 include:

PARETO<sup>™</sup> MIXING TECHNOLOGY: In 2016, we helped customers save an estimated 2.3 trillion BTUs globally through the use of our PARETO Mixing Technology, which enhances chemical performance by optimizing the injection of chemical additives into industrial-process streams. By allowing reuse of warmer process water in papermaking, papermakers avoid the need to heat water from freshwater temperature to process. The methodology used to estimate these reduced energy requirements is based on the quarterly calculated energy savings delivered by the technology based on historical and forecasted marketing and sales data.

**HVAC PERFORMANCE SERVICES:** In 2016, we helped customers in the United States and Canada save an estimated 289 billion BTUs through our HVAC Performance Services. The goal of this program is to maintain HVAC systems at peak performance. Dirty coils and inefficient filters can reduce cooling capacity, causing cooling-comfort or production-climate-control problems while wasting energy and increasing the waste stream of filter disposal. Ecolab achieves these emissions reductions by cleaning cooling and heating coils using an innovative process that recovers the heat-transfer capabilities of the coils. On average, the cooling capacity of the system is improved by 50 percent (based on internal national energy data). This coil-cleaning service is backed up by energy audits that document cooling capacity improvements, including energy savings and carbonfootprint reduction due to improved heat transfer and increased airflow/lower pressure drop across the cooling/heating coils. The methodology used to estimate these reduced energy requirements is based on the quarterly calculated energy savings delivered by the technology based on historical and forecasted marketing and sales data.

**APEX™:** In 2016, we helped customers in the United States save an estimated 502 billion BTUs through the use of our APEX warewashing program. By using the APEX program, restaurant owners are able to minimize rewash while maintaining cleaning performance and operating at a lower wash

temperature. The methodology used to estimate these avoided emissions is based on annual sales data for APEX and the assumption that a full-service casual dining restaurant open 364 days per year runs 127,400 racks per year. With the implementation of the APEX system, restaurants see a 10 percent rack reduction of washes.

AQUANOMIC<sup>™</sup>: In 2016, we helped customers in the United States and Canada save an estimated 1.01 trillion BTUs through the use of our Aquanomic laundry program. By using the Aquanomic program, lodging owners are able to reduce the number of rinse cycles while maintaining cleaning performance and operating at a lower wash temperature. The methodology used to estimate these reduced energy requirements is based on annual sales data for Aquanomic, water savings documented from field trials and third-party studies and the assumption that a load consists of 100 pounds of linen.

**3D TRASAR™ SOLID COOLING WATER:** In 2016, we helped customers in North America save an estimated 587 million BTUs though the use of our 3D TRASAR Solid Cooling Water program. The webbased data management platform allows our customers to efficiently optimize operation and maximize performance. The methodology used to estimate these reduced energy requirements is based on annual sales volume and the solids packaging and transportation benefits compared to traditional technology.

**NALCO BOILER TREATMENT TECHNOLOGY:** In 2016, we helped customers globally save an estimated 6.5 trillion BTUs though the use of our Nalco Boiler Treatment Technology. By using Nalco Boiler Treatment Technology, customers are able improve boiler safety and reliability while achieving significant energy savings by reducing scale deposits in firetube boilers, optimizing boiler blowdown and improving condensate return to the boiler feedwater. The methodology used to estimate the reduced energy requirements is based on annual sales data for NexGuard boiler treatment programs and the number of Nalco accounts using Nalco boiler treatment programs and services and 3D TRASAR Boiler Automation.

**SANITIZING WASH 'N WALK:** In 2016, we helped customers in the United States and Canada save an estimated 333 billion BTUs through the use of our Sanitizing Wash 'n Walk platform. Sanitizing Wash 'n Walk No-Rinse Drain and Floor Cleaner/Sanitizer is an EPA-registered cleaner and sanitizer that provides total management of floors and drains in a single product. The enzyme-based floor cleaner formula provides immediate cleaning of all soil types and extended cleaning of organic grease, fats and oils, thereby reducing risks of slips and falls, while the cold water application saves energy. The methodology used to estimate the reduced energy requirements is based on annual sales data and energy avoided based on 50 percent energy reduction product factor.

**EXELERATE CIP PLUS TECHNOLOGY:** In 2016, we helped customers in the United States save an estimated 70 billion BTUs through the use of our Exelerate CIP Plus Technology. The energy savings are based on calculations and testing compared to traditional alkaline cleaners.

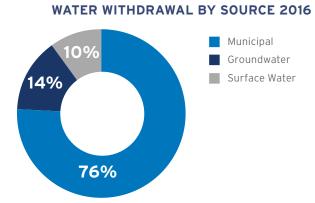
**3D TRASAR™ TECHNOLOGY FOR MEMBRANES:** In 2016, we helped customers save an estimated 11 billion BTUs globally through the use of our 3D TRASAR Technology for Membranes. Our 3D TRASAR technology detects and monitors critical operating parameters in real time, allowing customers instant access to system information anytime, anywhere, and determines and executes the correct response to dynamic system changes as they occur. Energy is saved by maximizing throughput and minimizing downtime. Energy savings are based on the difference in kilowatt hours of reject flow at 80 percent recovery and reject flow at 75 percent recovery.

**PURE COMFORT™ MINERAL PROGRAM:** In 2016, we helped customers in the United States save an estimated 180 billion BTUs through the use of our Pure Comfort Mineral Program. The Pure Comfort Mineral Program generates chlorine sanitizer necessary to maintain a safe and balanced pool. Energy savings are based on heating replacement water.

#### **Customer Impact**

Our solutions help customers achieve ambitious business and environmental goals. With an unparalleled combination of science and service, we deliver exponential outcomes that benefit customers and communities. Fundamental to our approach is an understanding that real and lasting change is accelerated when economic and environmental benefits align. We call this our eROI<sup>SM</sup> outcome: the exponential value of improved performance, operational efficiency and sustainable impact. Measurement is a critical component of our process to deliver exponential outcomes. Using our proprietary eROI value approach, we measure our impact and quantify customers' return on investment. Key performance indicators for this include the number of eROI customer case studies (total, by divisions, new and expanded technologies). Our targets for case studies were 60, respectively. In 2016, we achieved 60 case studies (100 percent of annual target).

In 2016, we had a third-party validate our eROI methodology: Anthesis LLC conducted an independent review of the methodology, data collection and communications of Ecolab's eROI Calculator & Counter, and based on the results of our review process, it is our opinion that Ecolab has established appropriate systems for the collection, aggregation and analysis of quantitative data for determination of the savings and benefits of its products and services for the stated period and boundaries.



## **TOTAL WATER WITHDRAWAL BY SOURCE (G4-EN8)**

#### WATER WITHDRAWAL BY SOURCE

	Units	2016
Municipal Water or Other Water Utility	Cubic m	6,651,793
Groundwater	Cubic m	1,219,564
Surface Water	Cubic m	830,074
Rain Water	Cubic m	65

#### TOTAL WATER WITHDRAWAL BY SOURCE (G4-EN8) (CONTINUED)

	Units	2015	2016
АР	Cubic m	859,789	797,104
EMEA	Cubic m	1,674,367	1,813,165
LA	Cubic m	464,162	485,941
NA	Cubic m	5,678,393	5,605,286
Total	Cubic m	8,676,711	8,701,496
	Units	2015	2016
Water Withdrawal Intensity (within the organization)	Cubic m/\$M	641	656

#### WATER WITHDRAWAL BY REGION

The scope of water withdrawal by region, by source data and intensity consists of global manufacturing facilities and headquarters/RD&E facilities.

### WATER SOURCES SIGNIFICANTLY AFFECTED BY WITHDRAWAL OF WATER (G4-EN9)

#### Overview

Ecolab undertakes an annual water-risk assessment to identify facilities that may operate within water stressed regions, both in the near and long term. The analysis is based on combining our operational water withdrawal and effluent footprint and production metrics with water risk inputs and financial cost valuations from the Water Risk Monetizer tool as a means to inform decisions at an operational level. The Water Risk Monetizer is a publicly available global water risk assessment tool that uses best-in-class local water basin datasets and scientific methodologies to monetize water-specific business risks. Rather than recreate existing assessment frameworks that address quantitative water risk, the Water Risk Monetizer utilizes leading, publicly available datasets such as those developed by the WRI (2016) and WWF (2016a). Ecolab released the tool in 2014, and launched Version 2 in 2015 to incorporate revenue at risk. Version 3, released in the spring of 2017 and used for our 2016 reporting year footprint analysis, addresses incoming and outgoing water quality risk and its potential impact on operating costs and provides a deeper level of business insight and action planning.

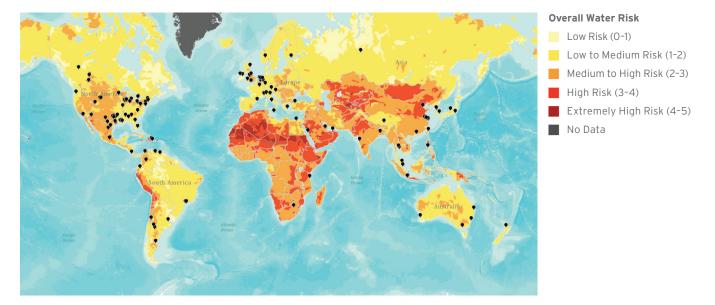
#### Methodology Detail

In 2016, we evaluated 100 percent of our direct operations. We removed facilities where we estimate for water data and are otherwise very small users of water (this includes an estimated 5 percent of water withdrawal and effluent from Offices, Distribution, Warehouses, Flex/R&D and related facilities). We refined our assessment to focus on the remaining 150 manufacturing and campus/technology center facilities, representing 95 percent of our total global water withdrawal

and effluent footprint. This list of facilities was assessed using a variety of risk criteria inputs provided by the WRI Aqueduct Tool and insights available through the Water Risk Monetizer.

#### Results

Based on this methodology, 17 facilities, representing less than 9 percent of our total water withdrawal and 8.5 percent of our production volume, operate in river basins with current and/or future defined water stress and may be affected by Ecolab's withdrawal of water.



Source: WRI Aqueduct 2017

Overall water risk identifies areas with higher exposure to water-related risks and is an aggregated measure of all selected indicators from the Physical Quantity, Quality and Regulatory & Reputational Risk categories.

We expanded this water stress by location assessment to further evaluate water risks and its relation to our business growth by applying further criterion to consider production volume at strategic sites and corresponding potential revenue-at-risk via the outputs from the Water Risk Monetizer. Additional financial analysis that incorporates incoming and outgoing water quality and quantity provides a "risk premium" relative to the price of water for each site. This information enables Ecolab to assess whether any individual sites or a combination of sites could expose the company to water risks, either current and/or future, that could result in a substantive change to our business, operations, revenue or expenditure. The results of this assessment are reported in our submissions to CDP, available at <u>www.cdp.net</u>.

#### **PERCENTAGE AND TOTAL VOLUME OF WATER RECYCLED AND REUSED (G4-EN10)**

	Units	2015	2016
Total Water Recycled and Reused	Cubic m	104,066	112,893
Total Water Recycled and Reused as a Percent of Total Water Withdrawal		1.33%	1.45%

The scope of water recycled and reused data includes global supply chain manufacturing sites, as reported. We are unable to provide consistent scope of data prior to 2014.

## OPERATIONAL SITES OWNED, LEASED, MANAGED IN OR ADJACENT TO PROTECTED AREAS AND AREAS OF HIGH BIODIVERSITY VALUE OUTSIDE PROTECTED AREAS (G4-EN11)

Ecolab owns one manufacturing facility in Garyville, Louisiana, that has protected wetlands on its property. The protected area on the premises comprises 220 acres or 0.89 km<sup>2</sup>. It is not developed and contains no buildings. This is the only known operational site that has owned or leased land that is in or adjacent to protected areas and areas of high biodiversity value outside of protected areas.

## DESCRIPTION OF SIGNIFICANT IMPACTS OF ACTIVITIES, PRODUCTS AND SERVICES ON BIODIVERSITY IN PROTECTED AREAS AND AREAS OF HIGH BIODIVERSITY VALUE OUTSIDE PROTECTED AREAS (G4-EN12)

Ecolab direct operations, activities, products and/or services do not have a significant impact on biodiversity in protected areas or areas of high biodiversity value outside of protected areas.

## HABITATS PROTECTED OR RESTORED (G4-EN13)

#### Protecting and Conserving Natural Environments

Ecolab is in the third year of a three-year, \$2 million partnership with The Nature Conservancy supporting their "Securing and Restoring Water Sources Around the Globe" Initiative.

• Ecolab pledged the leading \$500,000 gift to the Minnesota Headwaters Fund of The Nature Conservancy (TNC); this fund will implement targeted conservation projects (protection and restoration) to protect Minnesota's healthiest rivers and lakes. The fund supports protection and conservation work throughout the Upper Mississippi River basin. TNC used its freshwater blueprint to identify 3,200 acres in Minnesota most in need of protection in order to preserve the quality of water in critical waterways. Nearly 180 acres along 8,000 feet of the Pine River in the heart of the Mississippi Headwaters was earmarked in 2016 to receive investment from Ecolab's capital funds. Additional funds support reforestation along floodplains and farmlands which drain into Minnesota lakes and the Mississippi River to prevent water quality degradation.

- Ecolab and TNC expanded conservation efforts in the Cumbres de Monterrey National Park which provides 60 percent of the water for 4.5 million people living downstream in the Monterrey, Mexico, metropolitan area. In 2016, volunteers from Ecolab joined TNC to reforest 50 acres of pine forest, building on the successful tree planting the company supported in 2015. These trees increase rainwater capture, mitigate flooding, improve water filtration and regulate water flow.
- Ecolab was the sole sponsor of the China Urban Water Blueprint that launched in April 2016. This report provides important watershed information to public and private sector groups addressing water issues in China and informed TNC China's decision to start two new water funds in particularly water-stressed regions. The first fund will focus on reducing pollution seeping into the Dongjiang River Basin in southeast China, which provides water to millions of people in Hong Kong, Guangzhou and Shenzhen. The second fund will explore the potential to support Qiandao Lake in Zhejiang Province, which supplies water to Hangzhou and China's largest bottled water company, and also attracts many tourists to the natural beauty of the area.

## TOTAL NUMBER OF IUCN RED-LIST SPECIES AND NATIONAL CONSERVATION LIST SPECIES WITH HABITATS IN AREAS AFFECTED BY OPERATIONS (G4-EN14)

We are not aware of any operations that affect IUCN red-list species or national conservation list species.

### DIRECT GREENHOUSE GAS (GHG) EMISSIONS (SCOPE 1) (G4-EN15)



Scope 1 emissions reported are independent of any GHG trades, such as purchases, sales or transfers of offsets or allowances. The inventory includes  $CO_2$ ,  $CH_4$  and  $N_2O$  emissions from fuel consumption and HFC emissions from refrigerant use.

Note: PFCs,  $NF_3$  and  $SF_6$  are not included since Ecolab does not use these compounds.

Emissions factors used for electricity and other fuels are subregion-, country- or region-specific where applicable, using the latest databases from governmental sources (i.e., EPA's eGRID, UK's Defra and the International Energy Association).



Biogenic emissions include biodiesel and ethanol (E85) fuel use. Chosen base year for GHG emissions is 2015. United States Environmental Protection Agency's Climate Leaders Emissions factors were used to calculate direct emissions. Chosen consolidation approach for emissions is operational control.

## INDIRECT GREENHOUSE GHG EMISSIONS (SCOPE 2) (G4-EN16)

	Units	2015	2016
Gross Indirect (Scope 2) GHG Emissions	MT CO <sub>2</sub> e	265,958	257,786

Scope 2 emissions reported represent location-based emissions, and are independent of any GHG trades, such as purchases, sales or transfers of offsets or allowances. The inventory includes  $CO_2$ ,  $CH_4$  and  $N_2O$  emissions from electricity, heating and cooling consumption.

Chosen base year for GHG emissions is 2015. Emissions factors used for electricity and other fuels are subregion-, country- or region-specific where applicable, using the latest databases from governmental sources (i.e., United States Environmental Protection Agency's eGRID, UK's Defra and the International Energy Association). Chosen consolidation approach for emissions is operational control.

## OTHER INDIRECT GHG EMISSIONS (SCOPE 3) (G4-EN17)

	Units	2015	2016
Gross Indirect Business Travel (Scope 3) GHG Emissions	MT CO <sub>2</sub> e	44,012	43,910
Purchased Goods and Services	MT CO <sub>2</sub> e	6,711,304	5,461,275
Fuel and Energy Related Activities	MT CO <sub>2</sub> e	132,053	131,271
Waste Generated in Operations	MT CO <sub>2</sub> e	37,629	32,783

The scope of business-travel emissions is travel by United States-based and European-based employees only. Data availability for European business travel varies by country. It is estimated that 70 percent of all business travel emissions are represented. Defra 2015 emissions factors were used to calculate Scope 3 business-travel GHG emissions.

Ecolab has used Environmentally Extended Economic Input Output (EEIO) analysis for a portion of its annual supplier and procurement spend data. This is a categorization model to convert \$USD spend based on relevant NAICS sector categories into carbon emissions associated with the extraction, production and transport of purchased goods and services acquired or purchased by Ecolab in the reported year. For our first year of data collection, analysis and reporting, we have evaluated 100 percent of the spend in our three most material supplier categories: raw material chemical suppliers, packaging suppliers and equipment suppliers. For each, we have incorporated 100 percent of the global spend data for 2016 and years prior to enable year-on-year comparison. In total, this represents more than 50 percent of our total global supplier spend and corresponding purchased goods and services related emissions. Upstream emissions from purchased fuels, electricity, steam and hot and chilled water include generation and T&D emissions, and any other losses in this category. Data quality is considered to be consistent with inputs from our global database on sustainability metrics. Upstream emissions of purchased electricity are calculated for the US and other countries by multiplying electricity activity data by country- or region-specific emission factors from UK Defra 2014 Guidelines for GHG Reporting. Upstream emissions from purchased fuels, steam, hot and chilled water are calculated using emissions factors from UK Defra 2014 Guidelines for GHG Reporting. Emissions associated with losses were calculated for the US and other countries by multiplying the energy use by type by emission factors from UK Defra 2014 Guidelines for GHG Reporting. All GWPs are from the IPCC Second Assessment Report in line with the Kyoto Protocol.

This waste figure represents global waste emissions from waste disposed via landfilling, incineration, recycled or composted. Data quality is considered to be consistent with inputs from our global database on sustainability metrics. Data on waste quantity is obtained and reported from US and International sites. Emissions from waste are calculated using methodologies and emission factors from the EPA's Waste Reduction Model (WARM), version 14, March 2016. GWPs are from the IPCC (2007) Fourth Assessment Report. All waste management practice emissions factors are used directly from WARM ("Gross emissions" to remove "avoided emissions" credits and align with the GHGP). Landfill emissions include the decomposition of waste in a landfill and upstream collection and transport. Incineration emissions include transport to the incinerator and processing of materials prior to incineration. Recycled, Composted and Anaerobic Digestion (AD) emissions include collection and transport of waste to the processing site.

	Units	2015	2016
Direct and Indirect GHG Emissions Intensity	MT CO <sub>2</sub> e/\$M	55.6	56.0

#### **GHG EMISSIONS INTENSITY (G4-EN18)**

Gases included:  $CO_2$ ,  $CH_4$ ,  $N_2O$ . Includes Scope 1, 2 and business travel.

	Units	2015	2016
Direct GHG Emissions Intensity	MT CO <sub>2</sub> e/\$M	32.7	33.2
Indirect GHG Emissions Intensity	MT CO <sub>2</sub> e/\$M	19.6	19.4
Other Indirect (Scope 3) Emissions Intensity	MT CO <sub>2</sub> e/\$M	511	427

## **REDUCTION OF GHG EMISSIONS (G4-EN19)**

	Units	2016
AP	MT CO <sub>2</sub> e	16.4
EMEA	MT CO <sub>2</sub> e	211
LA	MT CO <sub>2</sub> e	9.7
NA	MT CO <sub>2</sub> e	413
Global	MT CO <sub>2</sub> e	650

The scope of reduction of emissions consumption data is global supply chain manufacturing facilities that reported energy efficiency projects. The inventory includes  $CO_2$ ,  $CH_4$  and  $N_2O$  emissions from fuel consumption and HFC emissions from refrigerant use. This includes both Scope 1 and 2 emissions, as reported. Note: PFCs,  $NF_3$  and  $SF_6$  are not included, since Ecolab does not use these compounds. Reduction data is calculated by our plant engineers and are annualized for 2016 savings only.

	Units	2015	2016
AP	MT CFC-11 Equivalents	0.01	0.005
EMEA	MT CFC-11 Equivalents	0	0
LA	MT CFC-11 Equivalents	0.14	0.0004
NA	MT CFC-11 Equivalents	0.13	0
Global	MT CFC-11 Equivalents	0.28	.0054

### EMISSIONS OF OZONE-DEPLETING SUBSTANCES (ODS) (G4-EN20)

No ODS are used in the production of Ecolab products. The ODS reported are used in chiller and HVAC systems in Ecolab manufacturing facilities. The scope of this metric is all supply-chain manufacturing facilities, as reported. Substances included in this calculation include R22, R123 and R124A. Emissions factors from the Montreal Protocol were used.

## NOx, SOx AND OTHER SIGNIFICANT AIR EMISSIONS (G4-EN21)

NOx BY REGION

	Units	2015	2016
AP	MT	81	21
EMEA	MT	112	67
LA	MT	94	23
NA	MT	1,078	1,032
Global	МТ	1,365	1,143

#### SOx BY REGION

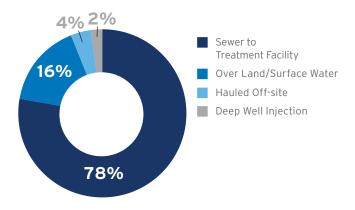
	Units	2015	2016
AP	MT	0.82	0.70
EMEA	MT	5.0	5.0
LA	MT	0.30	0.24
NA	MT	0.71	0.72
Global	МТ	6.83	6.66

	Units	2015	2016
NOx Emissions Intensity	MT/\$M	0.101	0.0861
SOx Emissions Intensity	MT/\$M	0.000504	0.000502

The scope of NOx and SOx reporting is global facility and fleet fuel use.

## TOTAL WATER DISCHARGE BY QUALITY AND DESTINATION (G4-EN22)

#### WATER DISCHARGE BY DESTINATION IN 2016



#### WATER DISCHARGE BY DESTINATION

	Units	2016
Deep Well Injection	Cubic m	80,679
Hauled Off-site	Cubic m	255,081
Over Land/ Surface Water	Cubic m	957,194
Sewer to Treatment Facility	Cubic m	4,575,278

#### TOTAL WATER DISCHARGE BY QUALITY AND DESTINATION (G4-EN22) (CONTINUED)

	Units	2015	2016
AP	Cubic m	507,672	431,366
EMEA	Cubic m	1,116,223	1,104,226
LA	Cubic m	239,903	247,678
NA	Cubic m	4,087,931	4,084,962
Global	Cubic m	5,951,729	5,868,232
	Units	2015	2016
Water Discharge Intensity	Cubic m/\$MM	439	442

#### WATER DISCHARGE BY REGION

The scope of water discharge is global manufacturing facilities and headquarters/RD&E facilities.

#### WATER DISCHARGE BY QUALITY

	Units	2015	2016
Biological Oxygen Demand (BOD)	МТ	1,680	2,579
Total Suspended Solids (TSS)	МТ	2,363	2,428

The scope of water quality data is global supply chain manufacturing facilities.

In 2015, 91 percent of supply chain manufacturing water discharge is represented in BOD volume and 93 percent of supply chain manufacturing water discharge is represented in TSS volume. In 2016, 78 percent of supply chain manufacturing water discharge is represented in BOD volume and 70 percent of supply chain manufacturing water discharge is represented in TSS volume.

## TOTAL WEIGHT OF WASTE BY TYPE AND DISPOSAL METHOD (G4-EN23)

	Units	2015	2016
Nonhazardous Solid Waste	MT	30,209	30,824
Hazardous Waste	MT	46,959	44,654
		2015	2016
Nonhazardous Solid Waste Intensity	MT/\$M	2.23	2.32
Hazardous Waste Intensity	MT/\$M	3.47	3.36

All waste is disposed of directly by the organization or otherwise directly confirmed by the waste disposal contractor. The primary type of hazardous waste that Ecolab produces is process waste from vessel washouts, equipment cleaning, etc. Generally, this waste is corrosive or flammable, which is why it is deemed hazardous.

The scope of hazardous and nonhazardous solid waste is globally owned and leased facilities.

	Units	2015	2016
AP	MT	1,369	1,020
EMEA	МТ	4,303	3,743
LA	МТ	995	797
NA	МΤ	22,900	24,610
Global	МТ	29,567	30,170

#### NONHAZARDOUS SOLID WASTE BY REGION

## TOTAL WEIGHT OF WASTE BY TYPE AND DISPOSAL METHOD (G4-EN23) (CONTINUED)

#### NONHAZARDOUS SOLID WASTE BY DESTINATION

	Units	2016
Landfill	MT	23,476
Land Farm	MT	4,833
Energy Recovery	MT	1,168
Incineration	MT	470
Treatment	MT	132
Reuse	MT	64
Fuel Blending	MT	18
Compost	MT	7
Deep Well Injection	MT	2

#### HAZARDOUS WASTE BY REGION

	Units	2015	2016
AP	MT	5,139	5,247
EMEA	MT	19,887	15,789
LA	MT	3,816	4,230
NA	MT	17,596	18,883
Global	МТ	46,438	44,149

#### TOTAL WEIGHT OF WASTE BY TYPE AND DISPOSAL METHOD (G4-EN23) (CONTINUED)

#### HAZARDOUS WASTE BY DESTINATION

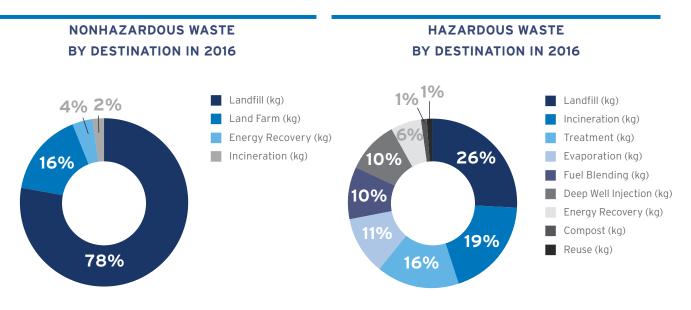
	Units	2016
Landfill	МТ	11,503
Incineration	MT	8,334
Treatment	MT	7,053
Evaporation	MT	4,902
Fuel Blending	MT	4,664
Deep Well Injection	MT	4,519
Energy Recovery	MT	2,578
Compost	MT	295
Reuse	MT	282
Sewer	MT	19

#### SOLID RECYCLED MATERIAL

	Units	2015	2016
Solid Recycled Material	МТ	10,345	6,157

The scope of nonhazardous and hazardous waste by region and by destination is global manufacturing facilities and headquarters/RD&E facilities. The scope of solid recycled material data is global supply chain manufacturing facilities.

#### TOTAL WEIGHT OF WASTE BY TYPE AND DISPOSAL METHOD (G4-EN23) (CONTINUED)



#### TOTAL NUMBER AND VOLUME OF SIGNIFICANT SPILLS (G4-EN24)

In 2016, our operations did not experience spills of material significance to our company or the communities in which we operate.

## WEIGHT OF TRANSPORTED, IMPORTED, EXPORTED OR TREATED WASTE DEEMED HAZARDOUS UNDER THE TERMS OF THE BASEL CONVENTION2 ANNEX I, II, III AND VIII, AND PERCENTAGE OF TRANSPORTED WASTE SHIPPED INTERNATIONALLY (G4-EN25)

All hazardous waste that leaves Ecolab facilities is shown in EN23, along with any treated hazardous waste by weight, type and region.

### IDENTITY, SIZE, PROTECTED STATUS AND BIODIVERSITY VALUE OF WATER BODIES AND RELATED HABITATS SIGNIFICANTLY AFFECTED BY THE ORGANIZATION'S DISCHARGES OF WATER AND RUNOFF (G4-EN26)

No facilities were identified or reported which may significantly impact water bodies from discharges of water and runoff. None of the river basins and water sources where Ecolab has operations are designated as protected areas (nationally or internationally). For more information about Ecolab's approach to water management, identification of facilities where water risk may exist and how Ecolab is managing these risks and opportunities as they relate to water, please refer to our CDP Water submission, available at <u>www.cdp.net</u>.

## MONETARY VALUE OF SIGNIFICANT FINES AND TOTAL NUMBER OF NONMONETARY SANCTIONS FOR NONCOMPLIANCE WITH ENVIRONMENTAL LAWS AND REGULATIONS (G4-EN29)

Ecolab is aware of a relatively small number of noncompliance issues and has a proactive and robust compliance program to address them promptly and completely. None of these issues resulted in material fines or penalties to the company under applicable reporting requirements. Additional information is provided in Ecolab's Form 10-K for the fiscal year ending December 31, 2016, in Part 1, Item 1, under Environmental Remediation and Proceedings and in Note 15 ("Litigation and Environmental Matters").

## TOTAL ENVIRONMENTAL PROTECTION EXPENDITURES AND INVESTMENTS BY TYPE (G4-EN31)

Our worldwide net expenditures for contamination remediation were approximately \$9.0 million in 2016. Our worldwide accruals at December 31, 2016, for probable future remediation expenditures, excluding potential insurance reimbursements, totaled approximately \$22 million. We review our exposure for contamination remediation costs periodically and our accruals are adjusted as considered appropriate. While the final resolution of these issues could result in costs below or above current accruals and, therefore, have an impact on our consolidated financial results in a future reporting period, we believe the ultimate resolution of these matters will not have a material effect on our consolidated results of operations, financial position or cash flows.

## PERCENTAGE OF NEW SUPPLIERS SCREENED USING ENVIRONMENTAL CRITERIA (G4-EN32)

New suppliers go through a methodical process to be added to our portfolio, this includes detailed risk assessment around legal, financial, operational or reputational damage. The supplier must pass the screenings prior to conducting business.

Ecolab communicates our expectations with suppliers via our Supplier Code of Conduct. This Code of Conduct is Ecolab's baseline expectations of our suppliers and we will not do business with any supplier who cannot meet these global standards. All suppliers, new and established, are expected to meet the standards outlined in the Supplier Code of Conduct.

The Supplier Code of Conduct includes expectations around human rights, ethics, labor rights, employment law, health and safety, environment, fair competition and supplied materials. This Supplier Code of Conduct applies to the selection and retention of all suppliers that provide goods or services to Ecolab worldwide, including raw material suppliers, semi-finished or finished goods suppliers, packaging suppliers, contractors, contract manufacturers and service providers (Suppliers). Suppliers are expected to comply with all local country labor and employment laws and regulations, including those related to wages, hours worked, working conditions and child labor.

The entire Code is published on www.ecolab.com and suppliers are instructed to utilize a Supplier Code of Conduct hotline to facilitate reporting by anyone concerned about potential violations. www.ecolab.com/about/suppliers/supplier-policies To reinforce its expectations, Ecolab utilizes an Ethical Sourcing Survey to screen high-risk suppliers. In 2014, we strengthened our Ethical Sourcing Survey process by establishing a cadence to survey our global suppliers. In 2014, all North American Contract Manufacturers completed the Ethical Sourcing Survey. In 2015, Global Contract Manufacturers were surveyed on their Ethical Sourcing. In 2016, we evaluated our supply base and identified high-risk suppliers based on country location. The high-risk country list was identified by utilizing third-party reporting (e.g., Human Rights Watch) and internal feedback from regional leaders.

Ecolab's Ethical Sourcing Survey covers employment practices, safety practices, wages and compensation, child and slave labor and working hours, and serves as a benchmarked survey of our ethical sourcing practices. The survey results are reviewed and evaluated for any responses that are identified as possible red flags. There are established mitigation steps that eliminate the risk at the supplier's level or, lacking supplier improvement, remove the deficient supplier from the approved supplier list.

Ecolab also has published and communicated to its suppliers its expectations around Slavery and Human Trafficking. The policy statement is a reaffirmation of Ecolab's approach to combating human trafficking: <a href="http://www.ecolab.com/about/suppliers/supplier-policies">www.ecolab.com/about/suppliers/suppliers/suppliers</a>

Ecolab supports and has a policy regarding the efforts of human rights organizations to end violence and atrocities in Central Africa, specifically the Democratic Republic of the Congo (DRC) and nine adjoining countries. New suppliers are asked about their conflict mineral status upon set-up.

While our data for the 2015 reporting year was incomplete, from the data that we did receive we believe that none of the necessary conflict minerals (3TG) contained in our in-scope products directly or indirectly financed or benefited armed groups in the DRC or an adjoining country.

Ecolab procures more than \$4.9 billion of direct raw material, contract manufacturing and equipment from more than 12,000 suppliers worldwide and manages distribution through various channels to external customers across 1.3 million locations. All chemical raw materials suppliers are screened prior to using their materials in our products. Suppliers go through a rigorous process called eSprint for initial approval or Alternate Supplier Approval Process (ASAP) for already approved products. Both processes evaluate the supplier based on service, quality, material specifications and price.

The supplier then goes through a series of approval checks on the material to ensure it meets our specifications. The approval of the supplier's material goes through CQA, R&D (Technical Review), Regulatory Affairs (checks for FDA, EPA, Kosher, NSF, Halal) and Procurement (Supplier Code of Conduct). In 2016, approximately 100 new suppliers were identified and 100 percent screened using the above criteria prior to initiate purchasing (or procurement) decisions.

## SIGNIFICANT ACTUAL AND POTENTIAL NEGATIVE ENVIRONMENTAL IMPACTS IN THE SUPPLY CHAIN AND ACTIONS TAKEN (G4-EN33)

Suppliers must meet our Ethical Sourcing Standards regarding forced labor, child labor, health and safety in the workplace, fair pay, harassment, diversity and ethics and environmental policies. Our supplier requirements are based on international standards including the United Nations Declaration of Human Rights, the United Nations Convention on the Rights of the Child and the Conventions of the International Labor Organization, including its Fundamental Principles and Rights at Work. In 2014, we initiated the process to expand the scope of our sourcing requirements to consider the carbon emissions footprint of our individual suppliers, as well as the sum total impact of this component of our value chain. In addition to the detailed supplier ethical assessment that our top suppliers must complete in order to verify compliance with Ecolab's ethical sourcing requirements, Ecolab has extended a carbon impact analysis to its global suppliers in the chemical, packaging and equipment categories (the sum total of which make up nearly 50 percent of our total global supplier spend), the top 80 percent of which represent more than 600 suppliers. Through this analysis we have found that this component of our supply chain has a carbon footprint that is eight times the size of our own Scope 1 and 2 combined footprint, meaning there are significant actual and potential negative environmental impacts associated with our supply chain.

We will continue to expand the number and scope of suppliers that we evaluate, report and engage with to enhance their performance and identify opportunities to mitigate and reduce their environmental impacts, while also seeking to support our suppliers to meet the requirements of our Ethical Sourcing Standards.

#### NUMBER OF GRIEVANCES ABOUT ENVIRONMENTAL IMPACTS FILED, ADDRESSED AND RESOLVED THROUGH FORMAL GRIEVANCE MECHANISMS (G4-EN34)

In 2016, we did not receive material grievances about environmental impacts.

### **DISCLOSURE OF MANAGEMENT APPROACH**

The following Disclosure of Management Approach covers labor practices and decent work aspects material to Ecolab as disclosed in this report.

#### Commitments

We are committed to a culture that fully leverages our employees' talents by promoting an environment where all people can make a difference, be heard, be supported, be developed and be rewarded for their contributions. We value the energy, ideas and ultimate success that diversity brings to our industry, our company and the global community we serve.

Ecolab takes our responsibility to our employees and our communities very seriously. We believe in compensating our employees fairly and in compliance with local laws. We promote the well-being of our employees, our customers and our customers' customers by contributing to programs and initiatives that enhance the quality of life in the communities where they work and live.

The safety of our employees, contractors and customers is our number one priority. From the way we operate to the products we develop to the customers we serve, our commitment to safety is uncompromised.

#### Policies

Our Code of Conduct guides the way we conduct business internally and with our customers, suppliers and within the communities in which we operate. Ecolab adopted its first Code of Conduct policy in 1976. The policy was last amended on November 29, 2012. The Code of Conduct applies to all Ecolab officers, directors and employees. Ecolab intends to promptly disclose on our website should there be any further amendments to, or waivers by the board of directors of, the Code of Conduct (www.ecolab.com/sustainability/commitment-to-sustainability/people/human-rights).

Ecolab also has a Global Safety, Health & Environmental Position: <u>www.ecolab.com/~/</u> <u>media/Ecolab/Ecolab%20Home/Documents/DocumentLibrary/PositionStatements/</u> <u>EcolabGlobalSafetyHealthandEnvironmentPositionCopy.ashx</u>

#### Goals, Targets and Evaluation

Our goals are simple: zero accidents, zero injuries and zero violations. This is a collective goal in which each and every employee must commit to, own and deliver on safety – 24 hours a day, seven days a week, 365 days a year. We're supporting employees with proven safety programs, processes and platforms to help them achieve those goals.

Our training and onboarding programs help us achieve these goals and provide leading metrics upon which to measure company performance. In 2015, we launched Ecolab OneHR, a cloud-based global platform that provides workforce insights and enables actionable workforce analytics and enterprise-level reporting. We set a goal for implementation and adoption of this platform for 100 percent coverage of global employees by 2016. At the close of the 2016 year, we achieved this goal. We continue to refine these programs and expand the population impacted by these programs in order to improve our overall safety performance.

- Safety Leadership Training: Safety Leadership is a half-day course designed to support managers as they become more actively engaged as safety leaders. The course is delivered by Safety, Health and Environmental (SH&E) with support of business leaders.
  - 2016 target: Train remaining 627 Executive and Field Management Leaders who have not completed the training in prior years
  - 2016 performance: Trained 675 of 805 (84 percent) Executive and Field Management Leaders who were appointed in 2016 or had not completed the training in prior years
  - 2017 target: 100 percent of Executive and Field Management Leaders complete the Safety Leadership Training course
- Driver Safety Training: Behind-the-Wheel (BTW) training is a course designed to teach vehicle control and accident avoidance techniques. Course and vendor suitability is determined by regional and market SH&E resources.
  - 2016 target: 100 percent of the driver population that has not completed BTW within the past three years
  - 2016 performance: 8,283 of 8,410 (98 percent) targeted associates completed BTW training in 2016
  - 2017 target: 100 percent of the driver population that has not completed BTW within the past three years
- Safety Onboarding: Divisional safety onboarding processes are designed to provide newly hired sales and service personnel with basic safety training. The training includes eight modules of cross-divisional training (SOS® Core) and additional division-specific content.
  - 2016 target: 100 percent of new employees trained within their first year
  - 2016 performance: 3,307 of 3,386 (98 percent) new hires in 2016 completed the safety onboarding training
  - 2017 target: 100 percent of newly hired field personnel trained in the first month

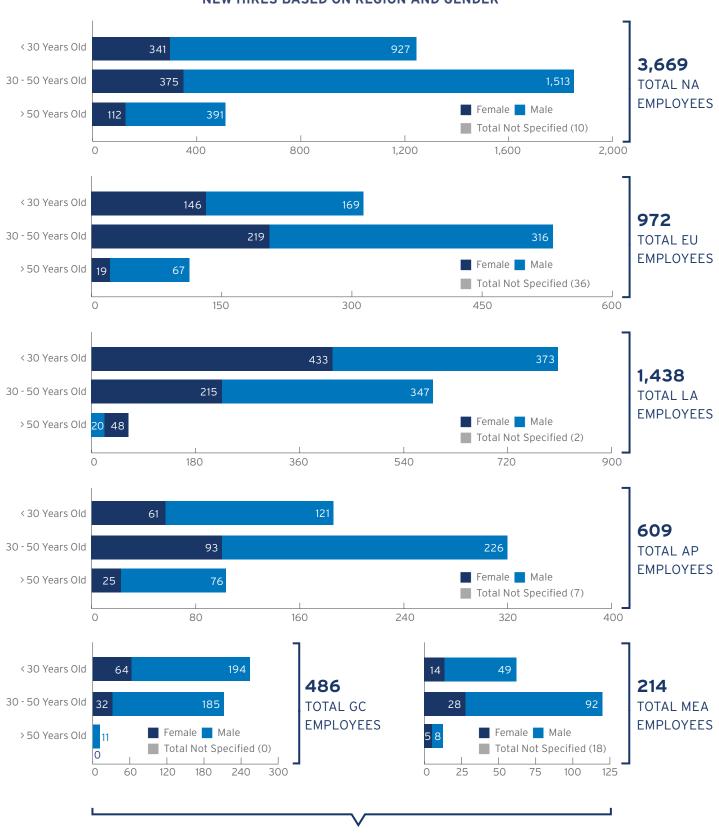
Understanding underlying and potential risks is a critical component to improving safety outcomes. Our Global Safety Dashboard tracks our performance on a range of leading and lagging safety indicators. This level of transparency helps us focus on areas of greatest needs and measure the effectiveness of our safety programs.

Our approach to safety communications is aimed at encouraging employees in the field, offices and plants to embrace safety as a personal issue. As part of those communications, we highlight different topics to encourage positive safety behaviors and awareness and eliminate risks. Safety is fully embedded into our company values.

#### Responsibilities

Our commitment is supported by an engaged Executive Safety Leadership Council, active Regional Safety Leadership Councils in all regions and large markets and a Board of Directors Safety, Health and Environment Committee.

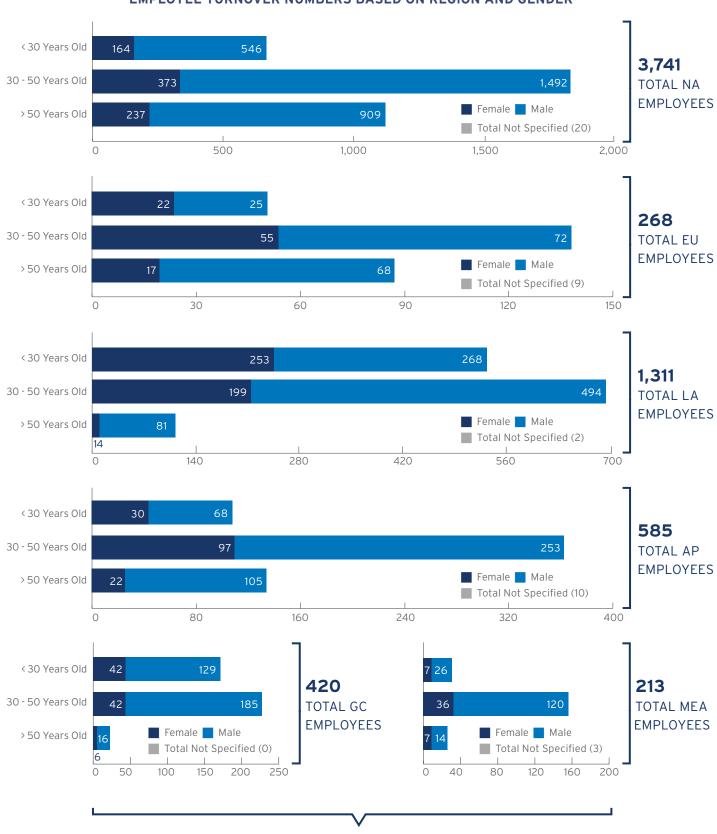
#### TOTAL NEW HIRES AND EMPLOYEE TERMINATION BY REGION AND GENDER (G4-LA1)



**NEW HIRES BASED ON REGION AND GENDER** 

7,388 TOTAL NEW HIRE GLOBAL EMPLOYEES

## TOTAL NEW HIRES AND EMPLOYEE TERMINATION BY REGION AND GENDER (G4-LA1) (CONTINUED)



EMPLOYEE TURNOVER NUMBERS BASED ON REGION AND GENDER

6,538 TOTAL TURNOVERS

## BENEFITS PROVIDED TO FULL-TIME EMPLOYEES THAT ARE NOT PROVIDED TO TEMPORARY OR PART-TIME EMPLOYEES (G4-LA2)

Ecolab provides market-competitive benefits based on country-specific needs and government requirements. All United States employees scheduled to work 20 hours or more per week are eligible for Ecolab's benefits package. Excluded employees include temporary, contract, intern, co-op and seasonal employees. (Excluded employees account for less than 1 percent of total workforce.)

An overview of our United States benefits is available at <u>www.ecolab.com/careers/benefits</u>.

#### **RETURN TO WORK AND RETENTION RATES AFTER PARENTAL LEAVE (G4-LA3)**

Ecolab does not provide any type of paid parental leave (regardless of gender). Globally, parental leaves and time away are handled in accordance with each country's local laws pertaining to time away from work. There is not a global policy or program. We do not track leaves by reason or retention rates after any type of leave.

In the United States, there are a number of ways employees are able to take time away from work as parents:

- Parents (regardless of gender) are able to apply for up to 12 weeks of unpaid leave under FMLA (if employed for one year and working 1,250 hours within that year) following a birth or adoption. FMLA leave details are in accordance with federal, state and local laws and include same-sex and opposite-sex relationships. We do not track FMLA leaves by reason or retention rates after any type of leave.
- Women may be eligible for short-term disability pay (they must work 20-plus hours per week to be eligible) for a period of time following a birth for which they are medically disabled (time runs concurrent with FMLA).
- Employees are encouraged to use their paid time off or vacation to spend time with their families. Extended vacations (if time is available) may be coordinated with manager's approval.

#### MINIMUM NOTICE PERIODS REGARDING OPERATIONAL CHANGES (G4-LA4)

Ecolab had three US-based collective-bargaining agreements in 2016. For these agreements, a minimum of 60 days' notice prior to the contract end date is required to propose any changes to the contract agreements. All collective-bargaining agreements contain a specified notice period and provisions for consultation and negotiation. Approximately 31 percent of employees covered by a collective-bargaining agreement are in Texas. Approximately 69 percent of employees covered by a collective-bargaining agreement are in Illinois.

# TYPE OF INJURY AND RATES OF INJURY, OCCUPATIONAL DISEASES, LOST DAYS AND ABSENTEEISM AND TOTAL NUMBER OF WORK-RELATED FATALITIES (G4-LA6)

#### TOTAL RECORDABLE INJURY RATE

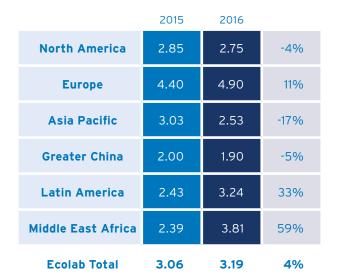
(Number of injuries and illnesses per 100 workers)

#### 2015 2016 North America 2.01 1.92 -4% 0.85 0.73 -14% Europe 0.90 0.58 **Asia Pacific** -36% **Greater China** 0.36 0.22 -39% Latin America 0.86 1.15 -25% Middle East Africa 0.54 0.72 33% Ecolab Total 1.42 1.30 -8%

#### TOTAL VEHICLE ACCIDENT RATE

(Per million miles driven)

Fatalities: O



\*Data for all countries outside of the United States is reported on a one-month lag. December 1, 2015 - November 30, 2016.

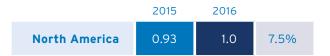
\*This information cannot be broken down by gender and does not include data for independent contractors.

\*All global operations conform to OSHA injury reporting standards.

Ecolab has a corporate-wide goal of zero accidents and injuries.

#### LOST TIME INJURY RATE

(Lost days per 100 workers)



As Ecolab transitioned to a web-based platform for injury and incident reporting we identified opportunities to improve the consistency of lost time injury rates outside of North America. Ecolab will report global lost time injury rates in 2017.

#### WORKERS WITH HIGH INCIDENCE OR HIGH RISK OF DISEASES RELATED TO THEIR OCCUPATIONS (G4-LA7)

None.

### HEALTH AND SAFETY TOPICS COVERED IN FORMAL AGREEMENTS WITH TRADE UNIONS (G4-LA8)

All (100 percent or three out of three contracts) formal collective-bargaining agreements between Ecolab and US-based trade unions cover health and safety topics. The employees participate in health and safety training. All formal collective-bargaining agreements between Ecolab and US-based trade unions contain mechanisms for complaints. All employees covered by collectivebargaining agreements may also report complaints through Ecolab's Code of Conduct hotline.

## AVERAGE HOURS OF TRAINING PER YEAR PER EMPLOYEE (G4-LA9)

Of the many key performance indicators tracked to measure the strength of our human capital development and training programs, average hours of Training & Development per FTE provides an indicative metric for our business.

In 2016, the global weighted average of Training & Development hours per FTE was 69, inclusive of our Nalco Water, Energy and Institutional global divisions which represent 45 percent of our global employees.

Beyond rigorous technical, functional and business-specific training programs, more than 300 associates participated in our global leadership development offerings (Leadership Foundations Series, Leadership Excellence and Action Learning Program). These programs are designed to support employees while making pivotal turns in their career. The objective of these flagship offerings is to provide a toolset, skillset and mindset to deepen leadership capability. More than 50 percent of participants were from outside of the United States.

In 2016, we continued the deployment of our Ecolab OneHR platform, a cloud-based global platform that provides workforce insights and enables actionable analytics and enterprise-level reporting. This system provides enterprise-wide visibility of employees, online talent processes and profiles and enables employees to manage their individual performance and development goals. With this platform successfully deployed and adopted, we have begun the process to evaluate our 15 Learning Management Systems supporting the various divisions across the globe, and develop the technology roadmap to an integrated learning management platform which will provide us even more powerful capabilities to deploy ongoing learning to our employees, and provide more comprehensive training record keeping.

## PROGRAMS FOR SKILLS MANAGEMENT AND LIFELONG LEARNING THAT SUPPORT THE CONTINUED EMPLOYABILITY OF EMPLOYEES AND ASSIST THEM IN MANAGING CAREER ENDINGS (G4-LA10)

Our global Performance Planning and Development (PP+D) program aims to provide a framework to guide employee performance and development.

- Our CEO-led Talent Council Meetings, as well as Talent Councils throughout our businesses and regions, provide an ongoing forum to review key talent and discuss critical roles and strategic talent issues.
- The Ecolab Leadership Model, which articulates a set of expected behaviors for leaders at all levels, has been embedded into all elements of our integrated talent system. These expectations include: Envision, Empower, Energize, Execute and Embody.
- Our Global Corporate Flagship Development Programs are designed to support employees while making turns in their career from Leading Self to Leading Others. The objective of these flagship offerings is to provide a toolset, skillset and mindset to deepen leadership capability. These courses are supplemented with an extensive catalog of online training provided by Harvard Business Publishing called Harvard ManageMentor. As a supplement to the corporate offerings, divisions and functions provide additional development opportunities specific to the unique needs of the business.

Ecolab believes in supporting the continuous learning and development of employees and also offers an educational assistance program in the United States. This program provides eligible employees an opportunity to receive financial reimbursement upon successful completion of approved educational programs and courses offered by colleges, business schools or technical schools that are accredited by the Council for Higher Education Accreditation (CHEA).

Employees retiring voluntarily do not receive a specific package but do receive generous payout of vacation (greater than voluntary separations).

In circumstances in which employment is involuntarily terminated as a result of a number of circumstances such as restructuring, redundancy, change in business strategy or other reason, a severance package is provided. The severance calculation takes into account the years of service of the employee, providing greater benefit to those with greater seniority. These practices are specific to operations within the United States. Outside of the United States, the following benefits vary based on local country practice and legislative mandates.

- Employees who receive a severance package continue their medical and dental benefits and group life insurance through their severance period at the same cost. If vested, their pension benefits will be calculated for them.
- Severance-eligible employees receive access to outplacement services ranging from one month to one year based on their organizational level. This service aids with dealing with transition, defining career objectives, resume and interview preparation, access to career fairs and job postings with other companies.
- Employees and their immediate families maintain the benefits of the Employee Assistance Program through their severance period to address questions and concerns with their nonworking life as well as the care.

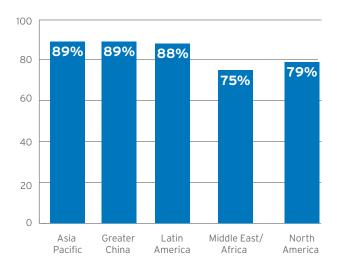
## PERCENTAGE OF EMPLOYEES RECEIVING REGULAR PERFORMANCE AND CAREER-DEVELOPMENT REVIEWS (G4-LA11)

Ecolab is committed to providing an effective performance-planning and development system that provides employees and their managers with the tools and processes to help employees optimize their performance. All Performance Planning and Development (PP+D) tools are housed and accessible to all employees in nine languages, with the forms available in 25 languages. Annual performance reviews for 2015 were completed in 2016, and consist of three sections:

- 1) Past-year results summary
- 2) Objectives for new year
- 3) Coaching and development plans

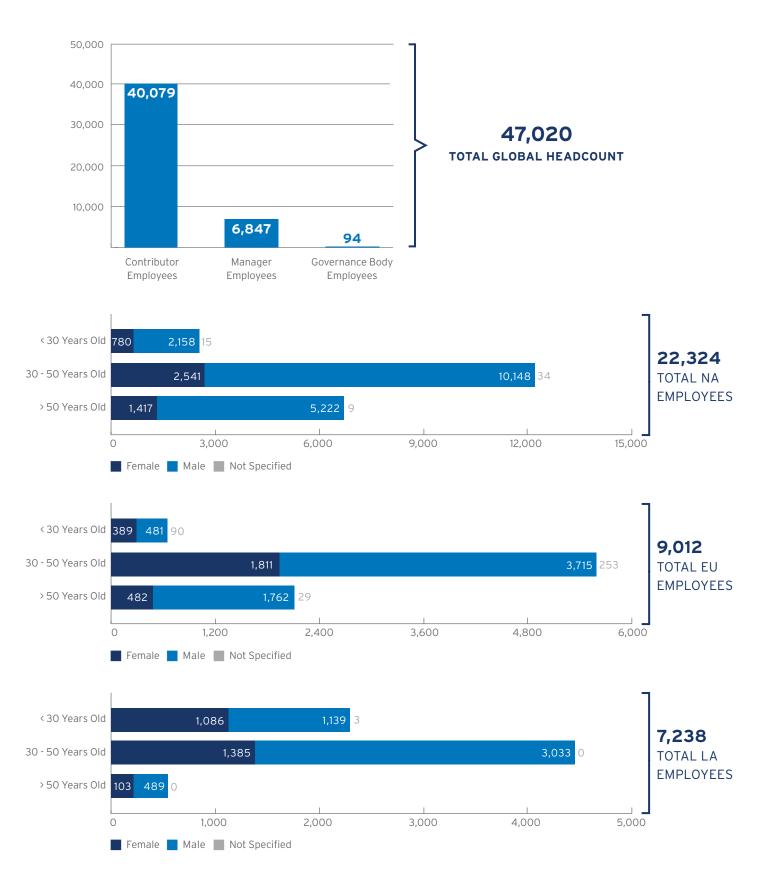
Globally, 82 percent of our employees' 2015 annual performance reviews have been recorded, with regional distribution displayed in graph below.

Starting in 2017, continuing with the transition to our Ecolab OneHR platform, the majority of employees will begin receiving performance reviews, goal setting and individual development planning using our online applications on our OneHR platform, which will streamline these core performance management and development planning processes, and give us even more timely and robust reporting capabilities.



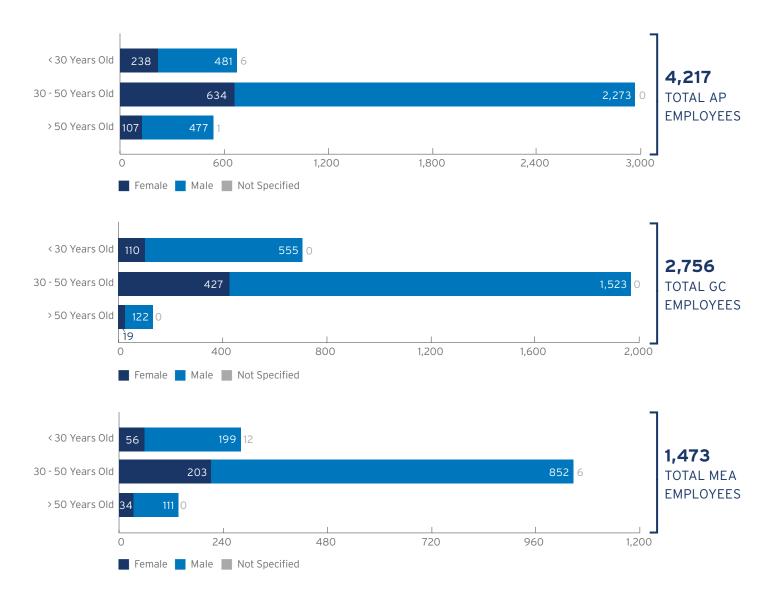
#### **COMPLETION RATE BY REGION**

#### **COMPOSITION OF GOVERNANCE BODIES (G4-LA12)**

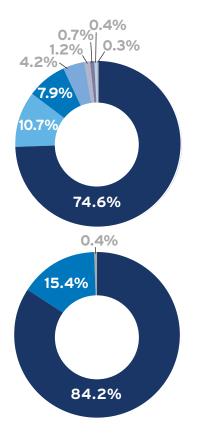


#### GLOBAL HEADCOUNT BY REGION, GENDER AND AGE GROUP

#### COMPOSITION OF GOVERNANCE BODIES (G4-LA12) (CONTINUED)



### COMPOSITION OF GOVERNANCE BODIES (G4-LA12) (CONTINUED)



#### **US HEADCOUNT BY ETHNIC ORIGIN**

White/Not Hispanic Origin	15,550
Hispanic or Latino	2,228
Black/Not Hispanic Origin	1,639
Asian or Pacific Islander	868
Two or More Races	254
Not Specified	145
American Indian/Alaskan	91
Native Hawaiian/Other Pacific Islander	62

## 20,837 TOTAL US EMPLOYEES

	1
Contributor Employees	17,549
Manager Employees	3,205
Governance Body Employees	83

## PERCENTAGE OF NEW SUPPLIERS SCREENED USING LABOR PRACTICES CRITERIA (G4-LA14)

New suppliers go through a methodical process to be added to our portfolio, this includes detailed risk assessment around legal, financial, operational or reputational damage. The supplier must pass the screenings prior to conducting business.

Ecolab communicates to our suppliers our expectations via our Supplier Code of Conduct. This Code of Conduct is Ecolab's baseline expectations of their suppliers and we will not do business with any supplier who cannot meet these global standards. All suppliers, new and established, are expected to meet this standard.

The Supplier Code of Conduct includes expectations around human rights, ethics, labor rights, employment law, health and safety, environment, fair competition and supplied materials. This Supplier Code of Conduct applies to the selection and retention of all suppliers that provide goods or services to Ecolab worldwide, including raw material suppliers, semi-finished or finished goods suppliers, packaging suppliers, contractors, contract manufacturers and service providers (Suppliers).

Suppliers are expected to comply with all local country labor and employment laws and regulations, including those related to wages, hours worked, working conditions and child labor.

The entire code is published on <u>www.ecolab.com</u> and suppliers are instructed to utilize a Supplier Code of Conduct hotline to facilitate reporting by anyone concerned about potential violations. <u>www.ecolab.com/about/suppliers/supplier-policies</u>

To reinforce its expectations, Ecolab utilizes an Ethical Sourcing Survey to screen high-risk suppliers. In 2014, we strengthened our Ethical Sourcing Survey process by establishing a cadence to survey our global suppliers. In 2014, all North American Contract Manufacturers completed the Ethical Sourcing Survey. In 2015, Global Contract Manufacturers were surveyed on their Ethical Sourcing. In 2016, we evaluated our supply base and identified high-risk suppliers based on country location. The high-risk country list was identified by utilizing third-party reporting (e.g., Human Rights Watch) and internal feedback from regional leaders.

Ecolab's Ethical Sourcing Survey covers employment practices, safety practices, wages and compensation, child and slave labor and working hours, and serves as a benchmarked survey of our ethical sourcing practices. The survey results are reviewed and evaluated for any responses that are identified as possible red flags. There are established mitigation steps that eliminate the risk at the supplier's level or lacking supplier improvement, remove the deficient supplier from the approved supplier list.

Ecolab has also published and communicated to its suppliers its expectations around Slavery and Human Trafficking. The policy statement is a reaffirmation of Ecolab's approach to combating human trafficking. <a href="http://www.ecolab.com/about/suppliers/supplier-policies">www.ecolab.com/about/suppliers/suppliers/suppliers</a>

Ecolab supports and has a policy regarding the efforts of human rights organizations to end violence and atrocities in Central Africa, specifically the Democratic Republic of the Congo (DRC) and nine adjoining countries. New suppliers are asked about their conflict mineral status upon set-up.

While our data for the 2015 reporting year was incomplete, from the data that we did receive we believe that none of the necessary conflict minerals (3TG) contained in our in-scope products directly or indirectly financed or benefited armed groups in the DRC or an adjoining country.

## SIGNIFICANT ACTUAL AND POTENTIAL NEGATIVE IMPACTS FOR LABOR PRACTICES IN THE SUPPLY CHAIN AND ACTIONS TAKEN (G4-LA15)

In 2016, Ecolab did not identify any operations or suppliers with actual or potential negative impacts for labor practices in our supply chain. We continue to evaluate our suppliers for any negative labor impacts via the Ethical Sourcing Survey.

Ecolab communicates to our suppliers our expectations via our Supplier Code of Conduct. This Code of Conduct is Ecolab's baseline expectations of their suppliers and we will not do business with any supplier who cannot meet these global standards. All suppliers, new and established, are expected to meet this standard.

The Supplier Code of Conduct includes expectations around human rights, ethics, labor rights, employment law, health and safety, environment, fair competition and supplied materials. This Supplier Code applies to the selection and retention of all suppliers that provide goods or services to Ecolab worldwide, including raw material suppliers, semi-finished or finished goods suppliers, packaging suppliers, contractors, contract manufacturers and service providers (Suppliers). Suppliers are expected to comply with all local country labor and employment laws and regulations, including those related to wages, hours worked, working conditions and child labor.

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## G4 SPECIFIC STANDARD DISCLOSURES SOCIAL: HUMAN RIGHTS

## DISCLOSURE OF MANAGEMENT APPROACH

The following Disclosure of Management Approach covers human-rights aspects material to Ecolab as disclosed in this report.

#### Commitment

As a socially responsible company, Ecolab has concern for the well-being of people and communities. We conduct business fairly and ethically, respect human rights and comply with laws and regulations. Our Human Rights Policy and Code of Conduct guide the way we conduct business internally, and with our customers, suppliers and within the communities in which we operate.

#### Our Human Rights Policy

As a global company, Ecolab is committed to enhancing the well-being of people and communities around the world.

Our employees' human rights are respected across our global operations and we are committed to respecting the international human-rights standards defined by the United Nations Global Compact. We aspire to create an inclusive and respectful work environment; one in which employees recognize each other's worth and dignity.

As stated in our Code of Conduct, any conduct that detracts from the worth and dignity of our employees is contrary to our values and has no place in our culture. We also are committed to showing respect to people and cultures in all of the countries where we do business.

Learn more about United Nations Global Compact Commitment: <u>www.unglobalcompact.org</u>

In addition, our Ethical Sourcing Standards and Conflict Minerals Policy are available at: <a href="http://www.ecolab.com/sustainability/commitment-to-sustainability/ethical-sourcing/">www.ecolab.com/sustainability/commitment-to-sustainability/ethical-sourcing/</a>

Our Supplier Code of Conduct describes Ecolab's expectations for its suppliers in the areas of integrity, ethical and legal standards, compliance, confidentiality, gifts, gratuities and business meals, labor rights and employment law, health and safety, environment, anti-bribery and corruption, fair competition and supplied materials (Supplier Code). <u>www.ecolab.com/about/suppliers/supplier-policies</u>

#### Goals, Targets and Evaluation

It is Ecolab's policy to disclose any human-rights controversies that may relate to labor issues, child employment, female or minority rights infringement or other issues pertaining to human rights.

#### TOTAL HOURS OF EMPLOYEE TRAINING ON HUMAN RIGHTS POLICIES OR PROCEDURES CONCERNING ASPECTS OF HUMAN RIGHTS THAT ARE RELEVANT TO OPERATIONS (G4-HR2)

Ecolab's Code of Conduct contains detailed human-rights aspects of relevance to our operations. All new employees participate in a facilitated two-hour training session on the Code of Conduct. On an annual basis, 100 percent of Ecolab employees are required to participate in a 45-minute Code of Conduct online training module and provide a signature of completion and compliance.

## OPERATIONS AND SUPPLIERS IDENTIFIED IN WHICH THE RIGHT TO EXERCISE FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING MAY BE VIOLATED OR AT SIGNIFICANT RISK (G4-HR4)

We adhere to National Labor Relations Board protocols to support employee rights to exercise freedom of association and collective bargaining. We recognize employees' right to form or join unions and encourage them to make an informed decision on the matter. Where employees have chosen to be represented by a labor union, we fulfill our bargaining obligations as defined by law. We have not identified any US-based operations at which freedom of association and collective bargaining may be violated or at risk.

We are unable to report on violations or risks of our suppliers.

## OPERATIONS AND SUPPLIERS IDENTIFIED AS HAVING SIGNIFICANT RISK FOR INCIDENTS OF CHILD LABOR AND MEASURES TAKEN TO CONTRIBUTE TO THE ABOLITION OF CHILD LABOR (G4-HR5)

In 2016, Ecolab did not identify any operations or suppliers with actual or potential negative impacts for child labor practices in our supply chain. We continue to evaluate our suppliers for any negative child labor impacts via the Ethical Sourcing Survey.

Ecolab communicates to our suppliers our expectations via our Supplier Code of Conduct. This Code of Conduct is Ecolab's baseline expectations of their suppliers and we will not do business with any supplier who cannot meet these global standards. All suppliers, new and established, are expected to meet this standard.

The Supplier Code of Conduct includes expectations around human rights, ethics, labor rights, employment law, health and safety, environment, fair competition and supplied materials. This Supplier Code applies to the selection and retention of all suppliers that provide goods or services to Ecolab worldwide, including raw material suppliers, semi-finished or finished goods suppliers, packaging suppliers, contractors, contract manufacturers and service providers (Suppliers). Suppliers are expected to comply with all local country labor and employment laws and regulations, including those related to wages, hours worked, working conditions and child labor.

The entire code is published on <u>www.ecolab.com</u> and suppliers are instructed to utilize a Supplier Code of Conduct hotline to facilitate reporting by anyone concerned about potential violations. <u>www.ecolab.com/about/suppliers/supplier-policies</u>

To reinforce its expectations, Ecolab utilizes an Ethical Sourcing Survey to screen high-risk suppliers. In 2014, we strengthened our Ethical Sourcing Survey process by establishing a cadence to survey our global suppliers. In 2014, all North American Contract Manufacturers completed the Ethical Sourcing Survey. In 2015, Global Contract Manufacturers were surveyed on their Ethical Sourcing. In 2016, we evaluated our supply base and identified high-risk suppliers based on country location. The high-risk country list was identified by utilizing third-party reporting (e.g., Human Rights Watch) and internal feedback from regional leaders.

Ecolab's Ethical Sourcing Survey covers employment practices, safety practices, wages and compensation, child and slave labor and working hours, and serves as a benchmarked survey of our ethical sourcing practices. The survey results are reviewed and evaluated for any responses that are identified as possible red flags. There are established mitigation steps that eliminate the risk at the supplier's level or, lacking supplier improvement, remove the deficient supplier from the approved supplier list.

Ecolab has also published and communicated to its suppliers its expectations around Slavery and Human Trafficking. The policy statement is a reaffirmation of Ecolab's approach to combating human trafficking. <a href="http://www.ecolab.com/about/suppliers/supplier-policies">www.ecolab.com/about/suppliers/suppliers/suppliers</a>

Ecolab supports and has a policy regarding the efforts of human rights organizations to end violence and atrocities in Central Africa, specifically the Democratic Republic of the Congo (DRC) and nine adjoining countries. New suppliers are asked about their conflict mineral status upon set-up.

While our data for the 2015 reporting year was incomplete, from the data that we did receive we believe that none of the necessary conflict minerals (3TG) contained in our in-scope products directly or indirectly financed or benefited armed groups in the DRC or an adjoining country.

## OPERATIONS AND SUPPLIERS IDENTIFIED AS HAVING SIGNIFICANT RISKS FOR INCIDENTS OF FORCED OR COMPULSORY LABOR AND MEASURES TO CONTRIBUTE TO THE ELIMINATION OF ALL FORMS OF FORCED OR COMPULSORY LABOR (G4-HR6)

In 2016, Ecolab did not identify any operations or suppliers with actual or potential negative impacts for forced labor practices in our supply chain. We continue to evaluate our suppliers for any negative forced labor impacts via the Ethical Sourcing Survey.

Ecolab communicates to our suppliers our expectations via our Supplier Code of Conduct. This Code of Conduct is Ecolab's baseline expectations of their suppliers and we will not do business with any supplier who cannot meet these global standards. All suppliers, new and established, are expected to meet this standard.

The Supplier Code of Conduct includes expectations around human rights, ethics, labor rights, employment law, health and safety, environment, fair competition and supplied materials. This Supplier Code applies to the selection and retention of all suppliers that provide goods or services to Ecolab worldwide, including raw material suppliers, semi-finished or finished goods suppliers, packaging suppliers, contractors, contract manufacturers and service providers (Suppliers). Suppliers are expected to comply with all local country labor and employment laws and regulations, including those related to wages, hours worked, working conditions and child labor.

The entire code is published on <u>www.ecolab.com</u> and suppliers are instructed to utilize a Supplier Code of Conduct hotline to facilitate reporting by anyone concerned about potential violations. <u>www.ecolab.com/about/suppliers/supplier-policies</u>

To reinforce its expectations, Ecolab utilizes an Ethical Sourcing Survey to screen high-risk suppliers. In 2014, we strengthened our Ethical Sourcing Survey process by establishing a cadence to survey our global suppliers. In 2014, all North American Contract Manufacturers completed the Ethical Sourcing Survey. In 2015, Global Contract Manufacturers were surveyed on their Ethical Sourcing. In 2016, we evaluated our supply base and identified high-risk suppliers based on country location. The high-risk country list was identified by utilizing third-party reporting (e.g., Human Rights Watch) and internal feedback from regional leaders.

Ecolab's Ethical Sourcing Survey covers employment practices, safety practices, wages and compensation, child and slave labor and working hours, and serves as a benchmarked survey of our ethical sourcing practices. The survey results are reviewed and evaluated for any responses that are identified as possible red flags. There are established mitigation steps that eliminate the risk at the supplier's level or, lacking supplier improvement, remove the deficient supplier from the approved supplier list.

Ecolab has also published and communicated to its suppliers its expectations around Slavery and Human Trafficking. The policy statement is a reaffirmation of Ecolab's approach to combating human trafficking and forced labor. <u>www.ecolab.com/about/suppliers/supplier-policies</u>

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While our data for the 2015 reporting year was incomplete, from the data that we did receive we believe that none of the necessary conflict minerals (3TG) contained in our in-scope products directly or indirectly financed or benefited armed groups in the DRC or an adjoining country.

# PERCENTAGE OF SECURITY PERSONNEL TRAINED IN THE ORGANIZATION'S HUMAN RIGHTS POLICIES OR PROCEDURES THAT ARE RELEVANT TO OPERATIONS (G4-HR7)

Security of Ecolab facilities is performed by Ecolab employees and third-party personnel. All (100 percent) Ecolab employees serving as security personnel are required to complete Ecolab's Code of Conduct training on an annual basis. Ecolab's Code of Conduct does not apply to third-party organizations providing security personnel to Ecolab facilities.

# TOTAL NUMBER AND PERCENTAGE OF OPERATIONS THAT HAVE BEEN SUBJECT TO HUMAN-RIGHTS REVIEWS OR IMPACT ASSESSMENTS (G4-HR9)

We follow a rigorous supplier-screening process that includes the Ethical Sourcing Survey, annual compliance training for our associates (which is documented) and efforts by our Quality Function to continue to stress the importance of human rights through physical audits.

Globally, Ecolab is a signatory to the UN Global Compact (UNGC) and has put in place programs in regions to assess conformity and ensure our policies are in place and in practice. Human rights issues identified within the UNGC framework are incorporated in Ecolab's Code of Conduct policy.

In North America, where 45 percent of our employees are located, 100 percent of our operations were subject to human-rights reviews or human-rights impact assessments in 2016. Human Resources regularly visits the plants and confirms compliance with our employee handbook. This set of policies is fully aligned with corporate policies but also addresses situations specific to the plants. We also have annual Code of Conduct and workplace-respect training at the plants.

In Latin America, 100 percent of our operations follow local legislation as it relates to human-rights reviews or human rights impact assessments. HR/SHE regularly visit and audit the plants and confirm compliance with our employee handbook. This set of policies is fully aligned with corporate policies but also addresses situations specific to the plants. We also have annual Code of Conduct and workplace-respect training at the plants.

In China, Southeast Asia, Australia and New Zealand, 100 percent of our operations are subject to human-rights reviews or human-rights impact assessments, specific to ensuring that our Code of Conduct is communicated and made appropriate for local markets. In India, human-rights reviews are conducted and are regularly reported to the government authorities. In Japan, Korea, Europe, Middle East and Africa, 100 percent of our employees complete Code of Conduct training and certification.

Additionally, our operations are periodically audited and approved by global and local customers, who check, among other items, human-rights-related aspects. In 2016, Ecolab began tracking performance on the percentage of employees who were trained through the Code of Conduct annual process on Human Rights issues and were required to disclose any concerns. Performance in 2016 was 98 percent completion against a target of 100 percent. Our annual goal for this metric is 100 percent.

# PERCENTAGE OF NEW SUPPLIERS SCREENED USING HUMAN-RIGHTS CRITERIA (G4-HR10)

New suppliers go through a methodical process to be added to our portfolio, this includes detailed risk assessment around legal, financial, operational or reputational damage. The supplier must pass the screenings prior to conducting business.

Ecolab communicates to our suppliers our expectations via our Supplier Code of Conduct. This Code of Conduct is Ecolab's baseline expectations of their suppliers and we will not do business with any supplier who cannot meet these global standards. All suppliers, new and established, are expected to meet this standard.

The Supplier Code of Conduct includes expectations around human rights, ethics, labor rights, employment law, health and safety, environment, fair competition and supplied materials. This Supplier Code applies to the selection and retention of all suppliers that provide goods or services to Ecolab worldwide, including raw material suppliers, semi-finished or finished goods suppliers, packaging suppliers, contractors, contract manufacturers and service providers (Suppliers). Suppliers are expected to comply with all local country labor and employment laws and regulations, including those related to wages, hours worked, working conditions and child labor.

The entire code is published on <u>www.ecolab.com</u> and suppliers are instructed to utilize a Supplier Code of Conduct hotline to facilitate reporting by anyone concerned about potential violations. <u>www.ecolab.com/about/suppliers/supplier-policies</u>

To reinforce its expectations, Ecolab utilizes an Ethical Sourcing Survey to screen high-risk suppliers. In 2014, we strengthened our Ethical Sourcing Survey process by establishing a cadence to survey our global suppliers. In 2014, all North American Contract Manufacturers completed the Ethical Sourcing Survey. In 2015, Global Contract Manufacturers were surveyed on their Ethical Sourcing. In 2016, we evaluated our supply base and identified high-risk suppliers based on country location. The high-risk country list was identified by utilizing third-party reporting (e.g., Human Rights Watch) and internal feedback from regional leaders.

Ecolab's Ethical Sourcing Survey covers employment practices, safety practices, wages and compensation, child and slave labor and working hours, and serves as a benchmarked survey of our ethical sourcing practices. The survey results are reviewed and evaluated for any responses that are identified as possible red flags. There are established mitigation steps that eliminate the risk at the supplier's level or, lacking supplier improvement, remove the deficient supplier from the approved supplier list.

Ecolab has also published and communicated to its suppliers its expectations around Slavery and Human Trafficking. The policy statement is a reaffirmation of Ecolab's approach to combating human trafficking. <a href="https://www.ecolab.com/about/suppliers/supplier-policies">www.ecolab.com/about/suppliers/supplier-policies</a>

Ecolab supports and has a policy regarding the efforts of human rights organizations to end violence and atrocities in Central Africa, specifically the Democratic Republic of the Congo (DRC) and nine adjoining countries. New suppliers are asked about their conflict mineral status upon set-up.

While our data for the 2015 reporting year was incomplete, from the data that we did receive we believe that none of the necessary conflict minerals (3TG) contained in our in-scope products directly or indirectly financed or benefited armed groups in the DRC or an adjoining country.

## SIGNIFICANT ACTUAL AND POTENTIAL NEGATIVE HUMAN-RIGHTS IMPACTS IN THE SUPPLY CHAIN (G4-HR11)

In 2016, we did not identify any operations or suppliers with actual or potential negative human rights impacts. We continue to evaluate our suppliers for any negative human rights impacts via the Ethical Sourcing Survey. We utilize a Supplier Code of Conduct hotline to facilitate reporting by anyone concerned about potential violations.

Ecolab communicates to our suppliers our expectations via our Supplier Code of Conduct. This Code of Conduct is Ecolab's baseline expectations of their suppliers and we will not do business with any supplier who cannot meet these global standards. All suppliers, new and established, are expected to meet this standard.

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# DISCLOSURE OF MANAGEMENT APPROACH

The following Disclosure of Management Approach covers society aspects material to Ecolab as disclosed in this report.

## Commitment

Our principles guide how we conduct business every day. We work hard to manage our global operations with care for the health, safety and prosperity of our employees, customers, communities and the environment. Everyone on the Ecolab team, regardless of role, is committed to these principles.

**ECONOMIC:** Drive economic growth for our customers, employees, shareholders and communities.

- Provide customers with products and services that create value and protect capital assets.
- Deliver superior shareholder value by helping our customers grow around the world.

**ENVIRONMENTAL:** Promote stewardship of natural resources and protect the environment.

- Respect and support the human right to water by conserving, reusing and recycling water and renewing water quality.
- Support society's need for increased energy through sustainable sources, products and technologies and efficient processes.
- Challenge the concept of waste through innovative and efficient use of resources, minimizing emissions to air, water and land.

SAFETY: Ensure safe processes that protect our employees, contractors, customers and communities.

- Ensure safety throughout the life cycle of each of our products.
- Train all employees to work safely, preventing injuries to themselves and others.
- Identify and address process-safety risks and strive for continuous improvement, with the goal of zero injuries, illnesses and incidents.

**SOCIAL:** Enhance the well-being of people and communities.

- Conduct business fairly and ethically, respecting human rights, complying with laws and regulations and following a rigorous Code of Conduct.
- Support communities through charitable giving and community involvement.

## Policies

Our Code of Conduct is the foundation that guides the way we conduct business internally, and with our customers, suppliers and within the communities in which we operate: <a href="http://www.ecolab.com/sustainability/commitment-to-sustainability/people/human-rights">www.ecolab.com/sustainability/commitment-to-sustainability/people/human-rights</a>

## Goals, Targets and Evaluation

Through auditable systems and open communications, we work to continuously improve outcomes and build a bright future for generations to come.

# PERCENTAGE OF OPERATIONS WITH IMPLEMENTED LOCAL COMMUNITY ENGAGEMENT, IMPACT ASSESSMENTS AND DEVELOPMENT PROGRAMS (G4-S01)

Since 1986, the Ecolab Foundation has implemented community impact programs to support the communities where our employees live and work, focusing on giving to local non-profit organizations in the areas of youth and education, civic and community development, arts and culture and environment and conservation. Since the inception of the Ecolab Foundation, the company has contributed more than \$94 million to non-profit organizations. In 2016, Ecolab contributed more than \$11 million to local communities through corporate giving, in-kind donations and the value of employee volunteerism.\*

Through our Community Relations Council program, 59 percent of our United States manufacturing locations have implemented local community engagement programs. Through corporate giving initiatives, 100 percent of our United States corporate facilities have implemented local community engagement programs. Globally, all Ecolab employees have access to team volunteer grants to implement community volunteer programs through approved partners.

Specific examples of how our commitment to giving back impacts local communities include:

- Ecolab's Visions for Learning program provides grants to teachers to augment student curriculum in their classrooms to directly impact learning and achievement. Since the inception of this program in 1986, nearly \$14 million in grants have supported teachers and students in communities where Ecolab has significant operations. In 2016, \$1.1 million in grants was distributed to classrooms in 339 schools across the United States (a 24 percent increase over 2015), positively impacting more than 151,000 students. Grant seekers are required to indicate demographics of their school's population including students who receive free and reduced lunch (the generally accepted marker for low-income households) as well as an ethnic breakdown of the school's student population. This information provides Ecolab's review committees with a snapshot of the socioeconomic status of the school population to help ensure funds are reaching students most in need.
- In St. Paul, Minn., the location of Ecolab's world headquarters, 22 percent of our local Youth and Education contributions supported the Saint Paul Public Schools (SPPS) in 2016 (Youth and Education programs represented 34 percent of the Foundation's total budget in 2016). Our significant partnership with SPPS helps drive improved graduation rates, as well as college preparation and access for local students. In a press release dated February 2017, SPPS reported, "SPPS Four-Year Graduation Rate Hits All-Time High in 2016. The four-year student graduation rates for Saint Paul Public Schools was 1.5 percentage points higher than 2015 with admirable results across both traditional and non-traditional secondary schools. The 2016 four-year graduation rate hit an all-time high of 76.5 percent."
- In 2016, Ecolab provided 22 percent of the funds directed to Saint Paul Public Schools specifically to Humboldt High School where 93 percent of the students qualified for free or reduced lunch (the generally accepted marker for low-income households). This funding supported Humboldt High School students through college preparatory and access programs, AVID and College Possible programs. In 2016, Ecolab was presented with an AVID Center honor for our longstanding commitment to the program. <u>www.avid.org/\_documents/Cargill,%20</u> <u>Travelers,%20Ecolab%20Honored%20by%20AVID.pdf</u>

AVID program participants increased their scores on the ACT by 42 percent at Humboldt during the 2015-16 school year, and 95 percent of the students involved in the College Possible program were accepted to college.

 As part of Ecolab's global philanthropic program, Solutions for Life, Ecolab and the Project WET Foundation co-created the Clean and Conserve Education Program. This free curriculum has reached more than 629,000 individuals through printed materials and 3.9 million through online impressions with its fun, hands-on lessons about water conservation and healthy hygiene practices. The Clean and Conserve curriculum is customized in Spanish (for Mexico), Mandarin and German in addition to English and includes an activity guide for teachers (also in Canadian French and Brazilian Portuguese), a children's storybook, an activity book for elementary and middle school students and a science project guide for high school students. These resources along with training videos can be downloaded free of charge at <u>www.projectwet.org/ cleanandconserve</u>. Additionally, "Soap and Water Science" teaches children how to protect themselves from germs with fun, online activities at <u>www.discoverwater.org</u>.

## Protecting and Conserving Natural Environments

Ecolab's global philanthropic program, Solutions for Life, also expands Ecolab's 25-year partnership with The Nature Conservancy (TNC) with a \$2 million investment over three years (through 2017). This investment has been critical to TNC's freshwater work in Minnesota, Mexico and China. Protecting critical lands and water in these regions has been guided by TNC's Urban Water Blueprint, an innovative freshwater mapping tool funded in part by Ecolab.

- Minnesota Headwaters Fund: TNC used the freshwater blueprint to identify 20,000 acres in Minnesota most in need of protection. Ecolab made the initial grant to help protect nearly 180 acres along 8,000 feet of the Pine River in the heart of the Mississippi Headwaters. Additional funds support reforestation along floodplains and farmlands which drain into Minnesota lakes and the Mississippi River.
- Mexico: Ecolab and TNC expanded conservation efforts in the Cumbres de Monterrey National Park which provides 60 percent of the water for 4.5 million people living downstream in the Monterrey, Mexico, metropolitan area. In 2016, volunteers from Ecolab joined local NGOs in reforesting 2.5 acres of pine forest, building on the successful tree planting and soil conservation work in 2015.
- China: Ecolab was the sponsor of the China Urban Water Blueprint that launched in April 2016. It provided TNC China the critical information to initiate two new representative water funds in critical watersheds in the country.

## Local Community Development Programs Based on Local Communities' Needs

We are committed to empowering our employees to give back in communities where we have significant operations. To facilitate local engagement and impact, we have Community Relations Councils in 17 regional locations around the United States and in each location there are more than 80 employees. Our local employees are most in touch with the needs of their communities. Community Relations Councils enable trained local Ecolab employee volunteers to administer Ecolab Foundation Community Grants and Visions for Learning teacher grants to deserving recipients in their communities where they believe our contributions can have the greatest impact. In 2016, these committees helped administer 1,120 grant applications, resulting in 805 grants to non-profits and schools totaling \$1,654,000.

Ecolab recognizes the contributions our individual employees make in their communities through Matching Gift, Dollars for Doers and Community Leadership programs, where applicants apply for a grant for their volunteer work and board leadership involvement at qualifying non-profit agencies. In 2016, 642 grants were distributed under these programs totaling more than \$243,780. Ecolab's Team Volunteer Grants encourage associates worldwide to gather in groups of five or more to volunteer with select national partners that support individuals and families in need: Dress for Success, Habitat for Humanity and Feeding America (and affiliate food shelves). In 2016, the fifth year of the program, volunteer hours more than tripled and the Ecolab Foundation matched these volunteer efforts with grants to these organizations totaling \$300,000.

In 2016, Ecolab associates around the globe volunteered more than 84,985 hours, which has a value of more than \$2 million.\*\*

## **Disaster Response**

As the world's leading supplier of cleaning and sanitizing products and solutions, Ecolab is very proud of our in-kind donation program where we annually donate needed cleaning and health and sanitizing products to organizations in areas where natural disasters have occurred, benefiting thousands. In 2016, more than \$1.4 million worth of Ecolab product donations went to worldwide relief efforts, including 142 tons in support of relief efforts after floods in Louisiana, Texas and West Virginia, Hurricane Matthew in the southeastern United States, and to hospitals, orphanages, fire and emergency response stations and emergency food relief centers in El Salvador, Honduras, Liberia, Romania and Sierra Leone.

## **Measurement and Metrics**

In 2016, we expanded our community grants feedback survey nationally to gather impact metrics from grantees to assess the effectiveness of Ecolab Foundation grants. This process measured the overall difference Ecolab's grants make for the organizations and communities served, such as: how the grant helps grantees expand program reach, improve outcomes, develop new programs and enhance internal capacity. Results will be utilized by Ecolab Foundation staff to better understand how our investments are making a difference in our communities. With a 61 percent response rate to the survey, 98 percent of Ecolab grant recipients accomplished or reached their goals related to their grant and 90 percent reported the grant from Ecolab increased their organization's profile, brand awareness and reputation.

Additionally, we surveyed employee volunteers related to their 2016 volunteer involvement to continue gathering data about the impact of volunteering on employee engagement, skills development and satisfaction of contributing to the community, as well as our associates' willingness to participate in future company-sponsored volunteer events. In this survey's results, 91 percent reported they feel they are better, happier employees because they are able to volunteer. Ninety-nine percent of employee volunteers indicated their volunteer involvement positively impacted their approach to team work. One hundred percent of employee volunteers indicated they felt their volunteer efforts made an impact in the community. And 99 percent of employees who volunteered said they would recommend volunteering for company-sponsored events to other employees.

For additional information, refer to <u>www.ecolab.com/about/corporate-responsibility/</u> <u>community-involvement</u>.

\*According to the Independent Sector \*\*Value of volunteerism per Independent Sector

## PERCENTAGE OF OPERATIONS WITH IMPLEMENTED LOCAL COMMUNITY ENGAGEMENT, IMPACT ASSESSMENTS AND DEVELOPMENT PROGRAMS (G4-S01) (CONTINUED)

## **VOLUNTEER EVENTS**

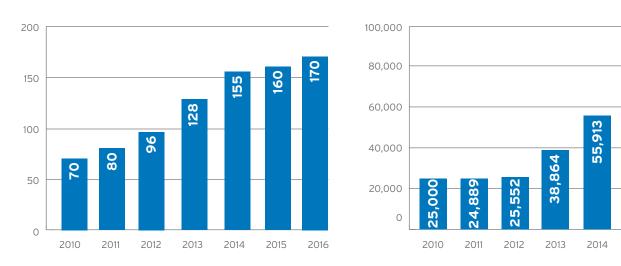


84,985

2016

60,500

2015



# OPERATIONS WITH SIGNIFICANT ACTUAL AND POTENTIAL NEGATIVE IMPACTS ON LOCAL COMMUNITIES (G4-S02)

None. Additional information is provided in Ecolab's Form 10-K for the fiscal year ending December 31, 2016, in Part 1, Item 1, under Environmental Remediation and Proceedings and in Note 15 ("Litigation and Environmental Matters").

# TOTAL NUMBER AND PERCENTAGE OF OPERATIONS ASSESSED FOR RISKS RELATED TO CORRUPTION AND SIGNIFICANT RISKS IDENTIFIED (G4-S03)

As part of the company's Internal Audit program, approximately 45 audits are completed each year focusing on internal/financial controls and operational processes, out of an audit population of approximately 165 auditable units (including countries, divisions and departments). Of these units, approximately 80 are individual country operating locations which are audited over a 4-5-year cycle. In these "operational audits," procedures include testing related to controls relevant to Ecolab's anti-corruption program. In addition, approximately four anti-corruption specific audits were completed in 2016 as part of Ecolab's anti-corruption program.

The Global Compliance department also completes various assessment activities for all regions and all business units, including related to recently acquired operations.

Few significant risks were identified, with risks relating to use of intermediaries being the highestrisk area identified.

# COMMUNICATION AND TRAINING ON ANTICORRUPTION POLICIES AND PROCEDURES (G4-S04)

Ecolab's anticorruption policies and procedures are communicated through the annual Code of Conduct training, which is mandatory for all employees globally. Employees must complete Code of Conduct training on an annual basis (either online or through classroom-style training for plant employees) and certify compliance with the Code. All governance body members are required to certify compliance with the Code of Conduct on an annual basis. In addition to the Code of Conduct training, specific online annual anticorruption training and certification is also mandatory for leaders in divisional and functional key roles, and with market, regional or global responsibilities. More detailed in-person anticorruption training is provided to senior leaders in many markets within all regions – Europe, MEA, Greater China, Asia Pacific and Latin America. In addition to this training, which is provided to market and regional leaders, certain global business-unit managers receive the anticorruption training, including managers in the Energy Services business unit.

Ecolab's anti-corruption policies are available in 24 different languages and require all intermediaries operating or exporting outside the United States to sign and maintain current anticorruption undertakings, thus communicating our policies. In addition, in higher-risk countries, certain intermediaries have received training from company personnel.

## **TOTAL VALUE OF POLITICAL CONTRIBUTIONS (G4-S06)**

As disclosed on the Ecolab website, Ecolab made one corporate political contribution in 2016 in the amount of \$4,000.

Our associates have the opportunity to support the company's political action committee, the Ecolab Inc. Political Action Committee (ECOPAC). ECOPAC, which is funded by voluntary contributions from Ecolab associates, is a nonpartisan committee that supports candidates for Congress who share our basic philosophies and values, by contributing to legislators from both the Democratic and Republican parties representing a wide number of states where the company transacts business. Contributions are determined by a board of Ecolab executives based on criteria including representation of Ecolab facilities and/or significant base of employees, committee membership, committee leadership, positions on the issues and partisan balance.

ECOPAC does not support candidates for state, local or presidential office based on "nonbusiness" issues. ECOPAC complies with all federal laws regarding reporting by political action committees and Ecolab complies with all federal and state laws relating to the reporting of political contributions. A list of all political contributions by ECOPAC and Ecolab will be posted semiannually to the Ecolab website under Political Contribution Reporting. Additionally, a list of contributions for the current election cycle made by ECOPAC is available at the Federal Election Commission's website.

# TOTAL NUMBER OF LEGAL ACTIONS FOR ANTICOMPETITIVE BEHAVIOR, ANTITRUST AND MONOPOLY PRACTICES AND THEIR OUTCOMES (G4-S07) None.

# MONETARY VALUE OF SIGNIFICANT FINES AND TOTAL NUMBER OF NONMONETARY SANCTIONS FOR NONCOMPLIANCE WITH LAWS AND REGULATIONS (G4-S08)

In 2016, Ecolab did not incur significant fines (some minor fines were incurred) or nonmonetary sanctions other than, in limited circumstances, site-monitoring obligations related to environmental matters.

# PERCENTAGE OF NEW SUPPLIERS SCREENED USING CRITERIA FOR IMPACTS ON SOCIETY (G4-S09)

New suppliers go through a methodical process to be added to our portfolio, this includes detailed risk assessment around legal, financial, operational or reputational damage. The supplier must pass the screenings prior to conducting business.

Ecolab communicates to our suppliers our expectations via our Supplier Code of Conduct. This Code of Conduct is Ecolab's baseline expectations of their suppliers and we will not do business with any supplier who cannot meet these global standards. All suppliers, new and established, are expected to meet this standard.

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While our data for the 2015 reporting year was incomplete, from the data that we did receive we believe that none of the necessary conflict minerals (3TG) contained in our in-scope products directly or indirectly financed or benefited armed groups in the DRC or an adjoining country.

# SIGNIFICANT ACTUAL AND POTENTIAL NEGATIVE IMPACTS ON SOCIETY IN THE SUPPLY CHAIN AND ACTIONS TAKEN (G4-S010)

In 2016, Ecolab did not identify any operations or suppliers with actual or potential negative impacts on society in our supply chain. We continue to evaluate our suppliers for any negative societal impacts via the Ethical Sourcing Survey.

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The entire code is published on <u>www.ecolab.com</u> and suppliers are instructed to utilize a Supplier Code of Conduct hotline to facilitate reporting by anyone concerned about potential violations. <u>www.ecolab.com/about/suppliers/supplier-policies</u>

To reinforce its expectations, Ecolab utilizes an Ethical Sourcing Survey to screen high-risk suppliers. In 2014, we strengthened our Ethical Sourcing Survey process by establishing a cadence to survey our global suppliers. In 2014, all North American Contract Manufacturers completed the Ethical Sourcing Survey. In 2015, Global Contract Manufacturers were surveyed on their Ethical Sourcing. In 2016, we evaluated our supply base and identified high-risk suppliers based on country location. The high-risk country list was identified by utilizing third-party reporting (e.g., Human Rights Watch) and internal feedback from regional leaders.

Ecolab's Ethical Sourcing Survey covers employment practices, safety practices, wages and compensation, child and slave labor and working hours, and serves as a benchmarked survey of our ethical sourcing practices. The survey results are reviewed and evaluated for any responses that are identified as possible red flags. There are established mitigation steps that eliminate the risk at the supplier's level or, lacking supplier improvement, remove the deficient supplier from the approved supplier list.

Ecolab has also published and communicated to its suppliers its expectations around Slavery and Human Trafficking. The policy statement is a reaffirmation of Ecolab's approach to combating human trafficking. <a href="http://www.ecolab.com/about/suppliers/supplier-policies">www.ecolab.com/about/suppliers/suppliers/suppliers</a>

Ecolab supports and has a policy regarding the efforts of human rights organizations to end violence and atrocities in Central Africa, specifically the Democratic Republic of the Congo (DRC) and nine adjoining countries. New suppliers are asked about their conflict mineral status upon set-up.

While our data for the 2015 reporting year was incomplete, from the data that we did receive we believe that none of the necessary conflict minerals (3TG) contained in our in-scope products directly or indirectly financed or benefited armed groups in the DRC or an adjoining country.

## DISCLOSURE OF MANAGEMENT APPROACH

The following Disclosure of Management Approach covers product responsibility aspects material to Ecolab as disclosed in this report.

## Commitment

## ECOLAB'S PRODUCT SUSTAINABILITY POSITION

Ecolab develops programs that reduce or prevent human and environmental exposure to hazards and risks in chemical products through safer solid and liquid chemistry, packaging and dispensing systems.

We are committed to safety in our operations and to developing products that are safe for our customers and their intended application. We pay careful attention to ingredient responsibility, human health and environmental impact, without compromising performance. With products and services touching people every day in nearly every corner of the world, we have a responsibility to embed sustainability into every aspect of our innovations.

Our health and safety procedures for product formulation start with raw materials. Our product safety team screens all raw materials for chemicals of concern and each raw material is reviewed for regional and global chemical inventory compliance. This process informs final product safety analysis and safety data sheets (SDSs) for all Ecolab products.

## Goals, Targets and Evaluation

In 2016, we initiated a refresh of our approach to integrated product stewardship with the goal to bolster our Total Impact Approach by further integrating and aligning Customer VOC, product stewardship and innovation. This work is designed to further define the safety, health and environmental impacts of our products. It centers around a set of nine measurable human health, environmental and safety product attributes relevant to our customers' operations. Providing this information will help explain the impacts of our solutions as they are used by our customers. The technical information supporting these attributes is supported by our enterprise chemical management database, and thus, is consistent with our Safety Data Sheet literature. Accordingly, throughout 2016, we pivoted away from completing CIPP (Customer Impact Product Profile) reviews and instead focused on completing product assessments against these new criteria. In 2017, we aim to make this information readily available through our sales associates to help customers better understand and manage the impacts of purchasing decisions on their operations.

**Metric:** Number of SKUs (product, packaging and delivery system) evaluated against nine product sustainability criteria.

**Performance:** In 2016, Ecolab completed SKU evaluations for 490 products, representing our current and core Institutional Master Assortment products.

**Target:** Complete 720 SKU evaluations against the product sustainability criteria in 2017 covering core Institutional SKUs in North America. This represents nearly all of our core products within the North American Institutional business unit.

## Policies

Refer to <u>www.ecolab.com/sustainability/commitment-to-sustainability/ethical-sourcing</u> for our Ethical Sourcing Standards and Conflict Minerals Policy.

# PERCENTAGE OF SIGNIFICANT PRODUCT AND SERVICE CATEGORIES FOR WHICH HEALTH AND SAFETY IMPACTS ARE ASSESSED FOR IMPROVEMENT (G4-PR1)

All of our products and services are evaluated for strict compliance with applicable regulatory requirements. In 2016, Ecolab introduced a product sustainability program focused on our Institutional market. As part of this program, key human health and environmental safety attributes relevant to Institutional applications and our customers were defined (e.g., low volatile organic compounds (VOC), biodegradable as used). We are now evaluating most of the Institutional product portfolio against these criteria. Going forward, this data will be made available to our sales associates along with customer-facing documents to provide transparency and enable product sustainability discussions. This will allow our sales team to better assist our customers in selecting products with specific human health and environmental attributes. We expect this program to integrate product sustainability into the product development process as part of the standard business process. With success, we expect to determine if it can be leveraged more broadly across Ecolab markets.

# TOTAL NUMBER OF INCIDENTS OF NONCOMPLIANCE WITH REGULATIONS AND VOLUNTARY CODES CONCERNING THE HEALTH AND SAFETY IMPACTS OF PRODUCTS AND SERVICES DURING THEIR LIFE CYCLES (G4-PR2)

Ecolab is aware of a relatively small number of noncompliance issues and has a proactive and robust compliance program to address them promptly and completely. In 2016, none of these issues resulted in material fines or penalties to the company under applicable reporting requirements.

Additional information is provided in Ecolab's Form 10-K for the fiscal year ending December 31, 2016, in Part 1, Item 1, under Environmental Remediation and Proceedings and in Note 15 ("Litigation and Environmental Matters").

# TYPE OF PRODUCT AND SERVICE INFORMATION REQUIRED BY THE ORGANIZATION'S PROCEDURES FOR PRODUCT AND SERVICE INFORMATION AND LABELING (G4-PR3)

- Suppliers of our components or ingredients are required to meet our detailed technical specifications, disclose substance composition, and provide hazards, handling safety and disposal data. This is received in the form of Safety Data Sheets and Technical datasheets which are housed in our specifications database.
- We provide human health and environmental safety information on the top five components of each product via the SDS.
- Safe-use and disposal instructions for all of our products on the label and/or through our sales and service associates for all of our products. Globally, Ecolab distributes more than 1 million SDSs to customers annually in approximately 66 different country-specific templates and 43 languages.

 Entirely 100 percent of our products are reviewed for appropriate ingredient disclosure and accurate use and application instructions. We proactively transitioned to the Globally Harmonized Systems (GHS), and in countries where GHS policies have been adopted and implemented, Ecolab provides products that are classified and labeled according to GHS rules.

# TOTAL NUMBER OF INCIDENTS OF NONCOMPLIANCE WITH REGULATIONS AND VOLUNTARY CODES CONCERNING PRODUCT AND SERVICE INFORMATION AND LABELING (G4-PR4)

Ecolab is aware of a relatively small number of noncompliance issues and has a proactive and robust compliance program to address them promptly and completely. In 2016, none of these issues resulted in material fines or penalties to the company under applicable reporting requirements.

Additional information is provided in Ecolab's Form 10-K for the fiscal year ending December 31, 2016, in Part 1, Item 1, under Environmental Remediation and Proceedings and in Note 15 ("Litigation and Environmental Matters").

# **RESULTS OF SURVEYS MEASURING CUSTOMER SATISFACTION (G4-PR5)**

Our customer satisfaction measurement process recognizes business differences and applies individualized surveys to meet the needs of our business and our customers.

Ecolab provides a quantitative, globally integrated report for customers referred to as "Customer Feedback Surveys." The customer surveys are analyzed and assured by our third-party partner, a leading research firm specializing in customer satisfaction. We use this analysis to provide detailed feedback to individual customers during our annual customer business reviews. With the additional customer experiences measured, we can more adeptly add to the success of our customers.

Ecolab also has more than 50 Customer Service Call Centers located around the globe, fielding more than 11 million calls annually. We provide on-call assistance to our customers seven days a week and emergency support for our field service teams through electronic messaging. Regular visits ensure that our customers' needs are being met and products and systems are delivering superior results. Customer satisfaction surveys are conducted periodically and results are reviewed by business leaders and with customers.

Voice of Customer Program data is captured to measure customer loyalty and satisfaction of Ecolab Energy Services customers. Survey deployments continue twice per year with focus on customer's satisfaction with the business across 11 business drivers (safety, delivery, ease of doing business, etc.) and an assessment of customer loyalty using Net Promoter Score research methodology.

# SALE OF BANNED OR DISPUTED PRODUCTS (G4-PR6)

Ecolab operates worldwide and its products and services are subject to numerous laws and regulations regarding product development and distribution. Ecolab attempts to comply with all relevant laws and regulations regarding product development and distribution and has a robust process for ensuring compliance.

Additional information is provided in Ecolab's Form 10-K for the fiscal year ending December 31, 2016, in Part 1, Item 1, under Environmental Remediation and Proceedings and in Note 15 ("Litigation and Environmental Matters").

# TOTAL NUMBER OF INCIDENTS OF NONCOMPLIANCE WITH REGULATIONS AND VOLUNTARY CODES CONCERNING MARKETING COMMUNICATIONS (G4-PR7)

None. Additional information is provided in Ecolab's Form 10-K for the fiscal year ending December 31, 2016, in Part 1, Item 1, under Environmental Remediation and Proceedings, and in Note 15 ("Litigation and Environmental Matters").

# TOTAL NUMBER OF SUBSTANTIATED COMPLAINTS REGARDING BREACHES OF CUSTOMER PRIVACY AND LOSSES OF CUSTOMER DATA (G4-PR8)

None. Additional information is provided in Ecolab's Form 10-K for the fiscal year ending December 31, 2016, in Part 1, Item 1, under Environmental Remediation and Proceedings and in Note 15 ("Litigation and Environmental Matters").

## MONETARY VALUE OF SIGNIFICANT FINES FOR NONCOMPLIANCE WITH LAWS AND REGULATIONS CONCERNING THE PROVISION AND USE OF PRODUCTS AND SERVICES (G4-PR9)

Ecolab is aware of a relatively small number of noncompliance issues and has a proactive and robust compliance program to address them promptly and completely. In 2016, none of these issues resulted in material fines or penalties to the company under applicable reporting requirements.

Additional information is provided in Ecolab's Form 10-K for the fiscal year ending December 31, 2016, in Part 1, Item 1, under Environmental Remediation and Proceedings and in Note 15 ("Litigation and Environmental Matters").



#### VERIFICATION STATEMENT GREENHOUSE GAS EMISSIONS

Bureau Veritas North America (BVNA) was engaged to provide Limited Assurance and conduct an independent verification of the greenhouse gas (GHG) emissions reported by Ecolab Inc. (Ecolab) from January 1, 2016 through December 31, 2016. This Verification Statement applies to the related information included within the scope of work described below.

The determination of the GHG emissions is the sole responsibility of Ecolab. BVNA was not involved in determining the GHG emissions. Our sole responsibility was to provide independent verification on the accuracy of the GHG emissions reported, and on the underlying systems and processes used to collect, analyze and review the information.

Boundaries of the reporting company GHG emissions covered by the verification:

- Operational Control
- Worldwide

#### Emissions data verified:

- Scope 1: 441,129 metric tons of CO<sub>2</sub>e
- Scope 2 (Location-based): 257,786 metric tons of CO2e
- Scope 2 (Market-based): 263,073 metric tons of CO2e
- Scope 3: 43,900 metric tons of CO<sub>2</sub>e (Business Travel: Air Travel, Rental Cars, and Business Use of Personal Vehicles)

Data and information supporting the Scope 1 and Scope 2 GHG emissions assertion were historical in nature and were in some cases estimated rather than historical in nature.

Data and information supporting the Scope 3 GHG emissions assertion were in some cases estimated rather than historical in nature.

#### Period covered by GHG emissions verification:

• January 1, 2016 to December 31, 2016

#### GHG Reporting Protocols against which verification was conducted:

- World Resources Institute (WRI)/World Business Council for Sustainable Development (WBCSD) Greenhouse Gas Protocol, Corporate Accounting and Reporting Standard
- WRI/WBCSD Corporate Value Chain (Scope 3) Accounting and Reporting Standard

#### Bureau Veritas North America, Inc.

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Ecolab Inc. May 10, 2017

#### GHG Verification Protocols used to conduct the verification:

• ISO 14064-3: Greenhouse gases -- Part 3: Specification with guidance for the validation and verification of greenhouse gas assertions

#### Level of Assurance and Qualifications:

- Limited
- Materiality Threshold: ±5%

#### **GHG Verification Methodology:**

- Interviews with relevant personnel of Ecolab and their consultant;
- Review of documentary evidence produced by Ecolab;
- Review of Ecolab data and information systems and methodology for collection, aggregation, analysis and review of information used to determine GHG emissions; and
- Audit of samples of data used by Ecolab to determine GHG emissions.

#### Assurance Opinion:

Based on the verification process and procedures conducted to a limited assurance level of the GHG emissions assertion shown above, BVNA found no evidence that the GHG emissions assertion:

- is not materially correct;
- is not a fair representation of the GHG emissions data and information; and
- is not prepared in accordance with the WRI/WBCSD GHG Protocol Corporate Accounting and Reporting Standard.

It is our opinion that Ecolab has established appropriate systems for the collection, aggregation and analysis of quantitative data for determination of GHG emissions for the stated period and boundaries.



Ecolab Inc. May 10, 2017

#### Statement of independence, impartiality and competence

The Bureau Veritas Group is an independent professional services company that specializes in Quality, Health, Safety, Social and Environmental management with over 180 years history in providing independent assurance services, and an annual 2016 revenue of 4.5 Billion Euros.

No member of the verification team has a business relationship with Ecolab, its Directors or Managers beyond that required of this assignment. We conducted this verification independently and to our knowledge there has been no conflict of interest.

BVNA has implemented a Code of Ethics across the business to maintain high ethical standards among staff in their day-to-day business activities.

The verification team has extensive experience in conducting assurance over environmental, social, ethical and health and safety information, systems and processes, has over 20 years combined experience in this field and an excellent understanding of BVNA standard methodology for the verification of greenhouse gas emissions data.

Attestation:

May 10, 2017

Trevor A. Donaghu, Lead Verifier Senior Project Manager Sustainability and Climate Change Services Bureau Veritas North America, Inc. Shand Reiff

David Reilly, Technical Reviewer Senior Project Manager Sustainability and Climate Change Services Bureau Veritas North America, Inc.

This verification statement, including the opinion expressed herein, is provided to Ecolab and is solely for the benefit of Ecolab in accordance with the terms of our agreement. We consent to the release of this statement by you to the CDP in order to satisfy the terms of CDP disclosure requirements but without accepting or assuming any responsibility or liability on our part to CDP or to any other party who may have access to this statement.



#### VERIFICATION STATEMENT WATER WITHDRAWAL

Bureau Veritas North America (BVNA) was engaged to conduct an independent verification of the water withdrawal reported by Ecolab Inc. (Ecolab) from January 1, 2016 through December 31, 2016. The verification was carried out to provide a limited level of assurance. This Verification Statement applies to the related information included within the scope of work described below.

The determination of the water withdrawal is the sole responsibility of Ecolab. BVNA was not involved in determining the water withdrawal. Our sole responsibility was to provide independent verification on the accuracy of the water withdrawal information reported, and on the underlying systems and processes used to collect, analyze and review the information.

#### Boundaries of the reported data covered by the verification:

- Operational Control
- Worldwide

#### Data verified:

• Water Withdrawal: 9.2 million cubic meters

Data and information supporting the water withdrawal assertion were historical in nature.

#### Period covered by verification:

• January 1, 2016 through December 31, 2016

#### Reporting Protocols against which verification was conducted:

• CDP Guidance for Companies, for Corporate Reporting on Water on Behalf of Investors and Supply Chain Members (Water Withdrawal)

#### Verification Protocols used to conduct the verification:

- Bureau Veritas Assurance Procedures
- International Standard on Assurance Engagements (ISAE) 3000 (basis for Bureau Veritas assurance procedures)

#### Level of Assurance and Qualifications:

- Limited
- Materiality Threshold: ±5%

#### GHG Verification Methodology:

- Interviews with relevant personnel of Ecolab and their consultant;
- Review of documentary evidence produced by Ecolab;
- Review of Ecolab' data and information systems and methodology for collection, aggregation, analysis and review of information used to determine water withdrawal; and

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Ecolab May 10, 2017

• Audit of samples of data used by Ecolab to determine water withdrawal.

#### Assurance Opinion:

Based on the results of our verification process, there is no evidence that the water withdrawal assertion shown above:

- is not materially correct;
- is not a fair representation of the water withdrawal data and information; and
- has not been prepared in accordance with the CDP Project Guidance for Companies, for Corporate Reporting on Water on Behalf of Investors and Supply Chain Members.

It is our opinion that Ecolab has established appropriate systems for the collection, aggregation and analysis of quantitative data for determination of water withdrawal for the stated period and boundaries.

#### Statement of independence, impartiality and competence

Bureau Veritas is an independent professional services company that specializes in Quality, Health, Safety, Social and Environmental management with over 180 years' history in providing independent assurance services, and an annual 2016 revenue of 4.5 Billion Euros.

No member of the verification team has a business relationship with Ecolab, its Directors or Managers beyond that required of this assignment. We conducted this verification independently and to our knowledge there has been no conflict of interest.

BVNA has implemented a Code of Ethics across the business to maintain high ethical standards among staff in their day-to-day business activities.

The verification team has extensive experience in conducting assurance over environmental, social, ethical and health and safety information, systems and processes, has over 20 years combined experience in this field and an excellent understanding of BVNA standard methodology for the verification of greenhouse gas emissions data.

Attestation:

Trevor A. Doraghu, Lead Verifier Technical Director, Climate Change Services Sustainability and Climate Change Services Bureau Veritas North America, Inc.

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David Reilly, Technical Reviewer Senior Project Manager Sustainability and Climate Change Services Bureau Veritas North America, Inc.

May 10, 2017

This verification statement, including the opinion expressed herein, is provided to Ecolab and is solely for the benefit of Ecolab in accordance with the terms of our agreement. We consent to the release of this statement by you to the CDP in order to satisfy the terms of CDP disclosure requirements but without accepting or assuming any responsibility or liability on our part to CDP or to any other party who may have access to this statement.



## INDEPENDENT ASSURANCE STATEMENT

### Introduction and objectives of work

Bureau Veritas North America, Inc. (BVNA) was engaged by Ecolab Inc. (Ecolab) to conduct an independent assurance of its 2016 Corporate Sustainability Report (the Report). This Assurance Statement applies to the related information included within the scope of work described below. The intended users of the assurance statement are the stakeholders of Ecolab. The overall aim of this process is to provide assurance to Ecolab's stakeholders on the accuracy, reliability and objectivity of the information included in the Report.

The information that was assured and its presentation in the Report are the sole responsibility of the management of Ecolab. Bureau Veritas was not involved in the drafting of the Report. Our sole responsibility was to provide independent assurance on its content.

## Scope of work

Ecolab requested BVNA to include in its independent assurance the following:

- Data and report text included in the Report for the calendar year 2016 reporting period;
- Appropriateness and robustness of underlying reporting systems and processes, used to collect, analyze and review the information reported;
- Evaluation of the Report in accordance with the International Standard on Assurance Engagements 3000; and
- Evaluation of the Report against the principles of the Global Reporting Initiative (GRI) Reporting Framework as defined in the GRI G4 Sustainability Reporting Guidelines.

Excluded from the scope of our work is any assurance of information relating to:

- Activities outside the defined assurance period;
- Positional statements (expressions of opinion, belief, aim or future intention) by Ecolab;
- Statements of future commitment; and
- Any financial data previously audited by an external third party.

## Methodology

BVNA undertook the following activities:

- 1. Interviews with relevant personnel of Ecolab (including managers and staff members at the corporate level);
- 2. Review of internal and external documentary evidence produced by Ecolab;
- 3. Audit of performance data presented in the Report including a detailed review of a sample of data;
- 4. Review of Ecolab data and information systems for collection, aggregation, analysis and internal verification and review.



## **Our Findings**

On the basis of our methodology and the activities described above, BVNA has found no evidence that:

- The information and data included in the Report are not accurate, reliable and free from significant error, material mistakes or misstatements.
- The Report is not a fair representation of Ecolab's activities over the reporting period.
- The information is not presented in a clear and understandable manner, and allows readers to form a balanced opinion regarding Ecolab's performance and position during the 2016 reporting period.
- The Report has not been prepared in accordance with the GRI G4 Guidelines and includes appropriate consideration of the profile disclosures, management approach disclosures and performance indicators to meet the requirements of GRI G4 Core Requirements.

It is our opinion that:

- Ecolab has established appropriate systems for the collection, aggregation and analysis of relevant information, and has implemented underlying internal assurance practices that provide a reasonable degree of confidence that such information is complete and accurate.
- Ecolab's executive management supports the development of processes for the embedding of sustainable management concepts and practices in the company.

## Key Observations and Recommendations for 2016

- In previous years, much of the data regarding human resources and employee training was maintained in decentralized, regional systems, requiring manual consolidation and transcription for final reporting. As of the beginning of 2016, data regarding human resources was consolidated into a single, global system (Workday), resulting in improved data collection and accuracy. It is our understanding that initiatives are underway to consolidate data systems for training data, as well.
- Ecolab's commitment to continuous improvement in environmental performance was evident in its tracking of reductions in energy and water requirements of its products, as well as its screening of suppliers to maintain and improve performance throughout the supply chain.
- Much of the environmental performance data (energy, water, GHG) is collected electronically on a monthly basis, requiring minimal to no manual transcription. This methodology greatly reduces the potential for transcription error. BVNA recommends that Ecolab consider implementing this methodology wherever possible.

## Statement of independence, impartiality and competence

Bureau Veritas is an independent professional services company that specializes in Quality, Health, Safety, Social and Environmental management with over 185 years history in providing independent assurance services, and an annual 2015 revenue of 4.6 Billion Euros.

No member of the assurance team has a business relationship with Ecolab, its Directors or Managers beyond that of verification and assurance of sustainability data and reporting. We have conducted this verification independently and we believe there to have been no conflict of interest. Bureau Veritas has implemented a Code of Ethics across the business to maintain high ethical standards among staff in their day-to-day business activities.



The assurance team has extensive experience in conducting assurance over environmental, social, ethical and health and safety information, systems and processes, has over 20 years combined experience in this field and an excellent understanding of Bureau Veritas standard methodology for the Assurance of Sustainability Reports.

Attestation:

Trevor A. Donaghu, Lead Assuror Technical Director, Climate Change Services HSE Director - Cleveland Sustainability and Climate Change Services Bureau Veritas North America, Inc.

May 22, 2017

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John A. Stangline, Lead Assuror Sustainability and Climate Change Services Bureau Veritas North America, Inc.