

ECOLAB INC.

STATEMENT ON PRACTICES FOR COMBATTING FORCED LABOR AND HUMAN TRAFFICKING

MARCH 18, 2026

Ecolab has adopted a [Global Anti-Human Trafficking Policy](#) that forms the basis for Ecolab's and its subsidiaries' approach to combatting human trafficking and slavery. The policy applies to all Ecolab personnel, including directors, officers, and employees. It also applies to Ecolab's agents, subcontractors, product suppliers, distributors, vendors, and other firms that furnish supplies or services to or for Ecolab (collectively, "suppliers").

Ecolab suppliers must meet standards established in Ecolab's [Ethical Sourcing Standards](#) regarding forced labor, child labor, health and safety, fair pay and harassment in the workplace. We require that our suppliers identify and act swiftly to eliminate any unacceptable conditions or practices in their facilities. We will not do business with suppliers who do not support the fundamental principles of human dignity and rights of workers to fair and equitable treatment.

We base our supplier requirements on international standards including the United Nations Universal Declaration of Human Rights, the United Nations Convention on the Rights of the Child, and the International Labor Organization (ILO) 1998 Declaration on Fundamental Principles and Rights at Work. We have prepared this statement to provide an overview of Ecolab's efforts to combat slavery in its supply chains, in accordance with the California *Transparency in Supply Chains Act* and United Kingdom *Modern Slavery Act*. We also submit annual reports on these efforts to Public Safety Canada under Canada's *Fighting Against Forced Labour and Child Labour in Supply Chains Act* and to the Australia Attorney General under Australia's *Modern Slavery Act*.

In accordance with these Acts, Ecolab's updated disclosures as of February 2026 are set forth below.

1. Background on Ecolab Global Operations, Structure and Supply Chain

Operations & Structure. Ecolab is a global leader in water, hygiene and infection prevention solutions and services that protect people and vital resources. Our 48,000 employees deliver comprehensive solutions and personalized services to advance food safety, maintain clean and safe environments, optimize water and energy use and improve operational efficiencies and sustainability for customers in the food and food service, healthcare, hospitality, life sciences, government and education, and industrial markets in more than 170 countries. Ecolab's products and technologies are also used in water treatment, pollution control, and energy conservation.

Ecolab's organizational structure consists of a global business unit headquartered in St. Paul, Minnesota, United States and eight global operating units grouped into four segments:

- (1) **Global Water** provides water treatment and process applications and cleaning and sanitizing solutions to large industrial customers;
- (2) **Global Institutional & Specialty** provides specialized cleaning and sanitizing products to the foodservice, hospitality, lodging, government, education and retail industries

(3) **Global Healthcare & Life Sciences** provides specialized cleaning and sanitizing products to the healthcare, personal care and pharmaceutical industries; and

(4) **Global Pest Elimination** provides services to detect, eliminate and prevent pests such as rodents and insects.

Supply Chain Overview. Ecolab operates an extensive, integrated global supply chain with more than 300 manufacturing plants, distribution centers and other facilities owned and operated by Ecolab and its subsidiaries in approximately 100 different countries to support the company's direct sales, marketing and distribution activities. We procure more than \$4.1 billion of direct raw material, contract manufacturing and equipment from more than 7,600 suppliers worldwide and manage distribution through various channels to external customers. Raw materials purchased for use in manufacturing our products include:

- inorganic chemicals such as alkalis, acids, biocides, phosphonates, silicates and salts;
- organic chemicals such as acids, alcohols, amines, fatty acids, surfactants, and solvents;
- plastic films and parts utilized in our Healthcare business segment to manufacture medical devices that serve the surgical and infection prevention markets;
- pesticides utilized by our Pest Elimination business;
- packaging materials for our manufactured products; and
- components for our specialized cleaning equipment and systems.

In total, Ecolab purchases more than 10,000 raw materials, with the largest single raw material representing less than 4% of raw material purchases. Except for a few specialized chemicals that are manufactured internally, these raw materials are generally purchased on an annual contract basis from a diverse group of suppliers globally. When practical, global sourcing is used so that purchasing or production locations can be shifted to control product costs at globally competitive levels.

2. Risks of Forced Labor or Modern Slavery in Operations and Supply Chains

Ecolab's business lines, described above, have not been identified by non-governmental organizations or government reports as high-risk industries for forced labor, and we have not received reports of evidence or indications of forced labor, child labor or modern slavery within our operations or our industry sector. Nonetheless, Ecolab and its subsidiaries remain vigilant for indications of forced labor within our operations and industry, particularly in higher risk countries identified by non-governmental organizations and the U.S. Department of Labor.

The size and breadth of Ecolab's global supply chain necessitates that products and services are procured from direct and indirect suppliers operating in industries and countries where the risk of modern slavery is higher. Roughly 4.5% of Ecolab's global purchases of supplies and services are made in countries estimated to have a higher prevalence of forced labor – primarily chemicals, packaging, equipment and contract manufacturing that are purchased in or from China, which is listed as a "Tier 3" country with elevated risk of human trafficking and modern slavery by the U.S. State Department's 2025 Trafficking in Persons Report.

3. Ecolab's Actions to Assess and Address Risks of Forced Labor or Slavery

a) Verification & Auditing

Ecolab participates in SEDEX (Supplier Ethical Data Exchange), a non-profit membership organization dedicated to driving improvements in ethical and responsible business practices in global supply chains. It is a web-based platform for sharing information and audit results on four pillars: (1) labour standards; (2) health and safety; (3) environment; and (4) business integrity. As a member, Ecolab is committed to conducting audits annually and sharing these results within SEDEX.

In 2025, Ecolab upgraded to an "AB" membership with SEDEX. This has allowed Ecolab to expand its capability to perform human rights and environmental risk assessments to detect potential negative impacts among our tier-1 suppliers. The inherent risk score assigned by SEDEX considers country, product, commodity, and sector-specific risks which are then cross-referenced against our supplier spend and internal quality data, which can identify suppliers that need to take additional steps to demonstrate compliance with global modern slavery legislation. This initial assessment may prompt Ecolab to request that a supplier join SEDEX in order to complete a Self-Assessment Questionnaire (SAQ) and/or undergo a 3rd party site audit by a certified SMETA auditor.

Ecolab's Global Procurement Team initiated a project in 2026 to review 80% of Ecolab's \$4.1 billion direct spend (totaling 525 suppliers). At this time, a review of the top 400 suppliers, or 73% of Ecolab's direct spend, has already been completed. Our findings are that 1/3 of Ecolab's direct supplier spend is with an active member of Sedex.

b) Certification

Ecolab requires all suppliers to comply with applicable government regulations, as well as with [Ecolab policies and procedures](#), including Ecolab's [Global Anti-Human Trafficking Policy](#). We communicate our policies to relevant suppliers on an annual basis, but do not currently require certification.

c) Accountability

Ecolab's employees are held accountable for ensuring that Ecolab meets its standards regarding slavery and trafficking through [Ecolab's Code of Conduct](#) and [Global Anti-Human Trafficking Policy](#).

d) Training

Ecolab provides training to its supply chain and purchasing employees, as well as to its suppliers, regarding Ecolab's ethical sourcing policies and procedures, which includes a modern slavery element. In addition, every supplier that has an active membership with Sedex has access to a full training suite of topics that cover how to strengthen their own organizations' forced labor program.

4. Assessment of the Effectiveness of Actions Taken to Address Risks of Forced Labor

The group responsible for steering human rights topics is comprised of experts from different specialist units within the company such as procurement, legal, human resources, sustainability, supply chain, communications, government relations, and the operating divisions. This cross-unit collaboration helps

us approach our human rights due diligence holistically and in a spirit of continuous improvement. This group will regularly assess the effectiveness of our actions in identifying and managing modern slavery risks by tracking actions and outcomes, partnering with suppliers and other external partners, and undertaking internal governance and external assurance processes, overseen by Ecolab's Compensation and Human Rights Committee. Based on the results of these processes, we will adapt and strengthen our actions to continually improve our response to modern slavery.

A handwritten signature in black ink, appearing to read 'Ben Clark', with a stylized flourish at the end.

Ben Clark

EVP global SUPPLY CHAIN, CHIEF SUPPLY CHAIN OFFICER