

Ecolab Co. Compagnie Ecolab
Statement pursuant to Canada’s *Fighting Against Forced Labour and Child Labour in Supply Chains Act*
for the 2023 Reporting Year

1. Identity of reporting entity

Ecolab Co. Compagnie Ecolab (the “Company”) is providing this statement in compliance with the *Fighting Against Forced Labour and Child Labour in Supply Chains Act*, SC 2023, c 9. The Company is incorporated in Canada as an Unlimited Company, Business Number 888663390, Registry ID 4383712. The Company provides cleaning, sanitizing, and infection prevention products and services to the food and beverage, healthcare, hospitality, retail industries as well as government and education industries. The Company and its corporate affiliates also manufacture, distribute, and market detergents, germicides, water treatment products, and control equipment.

2. Reporting entity’s structure, operations and supply chains

a. Structure

i. Global Structure

The Company is a corporate subsidiary of global parent company Ecolab Inc. (“Ecolab”), a corporation founded in the United States in 1924. Ecolab’s organizational structure consists of a global business unit headquartered in St. Paul, Minnesota, United States, and global regional leadership teams overseeing global regions as follows:

- North America
- Asia Pacific
- India, Middle East, Africa
- Europe
- Latin America
- Greater China

Ecolab’s eight global operating units are grouped into four segments as follows:

- **Global Industrial** includes the Water, Food & Beverage, and Paper operating segments. It provides water treatment and process applications and cleaning and sanitizing solutions primarily to large industrial customers within the manufacturing, food and beverage processing, transportation, chemical, primary metals and mining, power generation, pulp and paper, commercial laundry, global petroleum and petrochemical industries.
- **Global Institutional & Specialty** includes the Institutional and Specialty operating segments. It provides specialized cleaning and sanitizing products to the foodservice, hospitality, lodging, government, education and retail industries.
- **Global Healthcare & Life Sciences** includes the Healthcare and Life Sciences operating segments. It provides specialized cleaning and sanitizing products to the healthcare, personal care and pharmaceutical industries.
- **Global Pest Elimination** is comprised of the Pest Elimination operating segment, which provides services to detect, eliminate and prevent pests such as rodents and insects.

Ecolab, through its subsidiaries, has direct operations in approximately 100 countries worldwide. As of December 31, 2023, Ecolab employed approximately 48,000 employees, including approximately 26,000 sales and service and 1,100 research, development, and engineering associates. Approximately 42% of

the associates are employed in North America, 20% in Europe, 7% in Asia Pacific, 17% in Latin America, 7% in India Middle East Africa, and 7% in China.

ii. Structure of the Company in Canada

The Company manufactures, imports, exports, sells, processes, and distributes cleaning, sanitizing, and infection prevention products and services in Canada. The Company has two subsidiaries, Ecolab CDN 2 Co. and Ecolab CDN 4 ULC. Neither of these subsidiaries sells, manufactures, processes or distributes any products or services.

b. Operations

i. Global Operations

Ecolab is a global leader in water, hygiene and infection prevention solutions and services that protect people and vital resources. Ecolab's 48,000 employees deliver comprehensive solutions, data-driven insights and personalized service 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, energy conservation, refining, primary metals manufacturing, papermaking, mining and other industrial processes.

ii. Canadian Operations

The Company employs approximately 730 people in Canada, roughly 70% in sales and service, 15% in manufacturing and distribution, and 15% in other functions. The Company manufactures products at its facility located in Mississauga, Ontario, and maintains three other warehouses and one office facility in Canada from which it distributes and sells products and provides services.

c. Supply Chains

Ecolab operates an extensive, integrated global supply chain, which comprises more than 300 manufacturing plants, distribution centers and other facilities owned and operated by Ecolab in approximately 100 different countries to support the company's direct sales, marketing and distribution activities. We procure more than \$ 4.0 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, including alkalis, acids, biocides, phosphonates, phosphorous materials, silicates and salts;
- organic chemicals, including acids, alcohols, amines, fatty acids, surfactants, solvents, monomers and polymers.
- 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 purchase more than 10,000 raw materials, with the largest single raw material representing less than 4% of raw material purchases. These raw materials, except for a few specialized chemicals that are manufactured internally, 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. We have encountered supply chain disruptions from the impacts of the COVID-19 pandemic which has impacted the availability of certain raw materials; however, we believe this to be short-term in nature. When practical, global sourcing is used so that purchasing or production locations can be shifted to control product costs at globally competitive levels.

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 Ecolab, including our Global Anti-Slavery Policy. We base our purchasing decisions on safety, quality, service and price, opting to purchase within the region whenever possible to minimize emissions from shipping materials overseas and support local economies.

3. Risks of forced labour or modern slavery practices in operations and supply chains

a. Overview of forced labour, modern slavery and the anti-slavery effort

An estimated 50 million people worldwide were victims of forced labour, also known as modern slavery, in 2021, with 28 million of those victims subject to forced labour. Of the 28 million people estimated to be subject to forced labour, 22 million people are exploited in the private economy rather than by a government entity. The Walk Free Foundation, the United Nations' International Labour Organization ("ILO") and other non-profit and governmental entities have, through research over the past decade, identified countries and industries with elevated risks of modern slavery, forced labour or child labour. They have found that the risks are higher in countries where there is political instability, violent conflict or war, lack of basic needs, disenfranchised groups of people, and high levels of inequality among people, and they have published rankings identifying the highest risk countries and regions as well as the highest risk products and industries. The research completed by these organizations has enabled companies worldwide, including Ecolab and its Canadian affiliate Ecolab Co. Compagnie Ecolab, to conduct more targeted assessment of their operations and global supply chains in support of the effort to eliminate modern slavery.

b. Risks of forced labour in Ecolab's industry sector and operational locations

Ecolab's business lines, including the manufacture and sale of cleaning chemicals and provision of water, hygiene and infection prevention services to other businesses, have not been identified by the ILO, Walk Free or other organizations as high-risk industries (the five highest risk industries are identified as the computer/mobile phone industry, the garment industry, and the fishing, cocoa and sugarcane industries). We have not received reports of evidence or indications of forced labour, child labour or modern slavery within our operations or our industry sector. Nonetheless, Ecolab and the Company remain vigilant for indications of forced labour within our operations and industry, particularly in higher risk countries identified by non-governmental organizations and the U.S. Department of Labour.

c. Risks based on our suppliers' industries and locations

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 5% of Ecolab's global purchases of supplies and services are made in countries estimated to have a higher prevalence of forced labour – primarily chemicals, packaging, equipment and contract manufacturing that are purchased in or from China, but also such materials and services in or from Malaysia, Vietnam, Russia and Nicaragua, each of which is listed as a "Tier 3" country with elevated risk of human trafficking and modern slavery by the U.S. State Department's 2022 Trafficking in Persons Report.

In light of Russia's invasion of Ukraine and the sanctions against Russia by the United States and other countries, Ecolab has made the determination that it will limit its Russian business to operations that are essential to life, providing minimal support for its healthcare, pharma, food and beverage and certain water businesses. Ecolab may further narrow its presence in Russia depending on future developments. Ecolab's Russian operations represented 10% of our Tier 3 supplier spend and approximately 1% of Ecolab's 2022 annual sales.

The U.S. Department of Labour issues an annual List of Goods Produced by Child Labour or Forced Labour, which is generally consistent with lists issued by organizations such as Walk Free Foundation. The 2020 U.S. Department of Labour List identifies 155 goods produced by child labour and/or forced labour in 77 countries. Goods on that list that are or may be in Ecolab's global supply chain include palm oil from Malaysia and Indonesia, electronics, abaca pulp used in labels/paper products and silica-based products from China.

The U.S. Custom & Border Patrol (CBP) also has authority to issue Withhold Release Orders, under which CBP can detain goods suspected of being produced with forced labour at U.S. ports unless the producer can demonstrate the goods were not manufactured with forced labour. There are currently 52 active Withhold Release Orders imposed on specific goods being imported into the U.S. from twelve different countries and 8 Findings of products entering the U.S. that were manufactured using forced labour. Several of these orders are specific to goods manufactured by a particular company within the country. Based on the types of goods from these countries that have been subject to Withhold Release Orders, risks of modern slavery in Ecolab's global supply chain may be elevated for chemical raw materials from China and agricultural raw materials such as palm oil from Malaysia.

4. Actions taken by Ecolab and the Company to assess and address these risks

a. Ecolab Global Anti-Human Trafficking Policy

Ecolab has adopted a Global Anti-Human Trafficking Policy (the "Ecolab Policy") that forms the basis of Ecolab's approach to combatting human trafficking and slavery. The policy applies to all Ecolab personnel, including directors, officers, and employees including those of Ecolab's subsidiaries, such as the Company. The Ecolab Policy applies equally to Ecolab's agents, subcontractors, product suppliers, distributors, vendors, and other firms that furnish supplies or services to or for Ecolab ("Suppliers").

Under the Ecolab Policy, Ecolab and its Suppliers shall not:

- Engage in trafficking in persons or the recruitment, harboring, transportation, provision, or obtaining of a person for labour or services, through the use of force, fraud, or coercion for the purpose of subjection to involuntary servitude, peonage, debt bondage, or slavery;
- Procure commercial sex acts;
- Use forced labour in the performance of any contract;
- Destroy, conceal, confiscate, or otherwise deny access by an employee to the employee's identity or immigration documents, such as passports or drivers' licenses, regardless of issuing authority;
- Use misleading or fraudulent practices during the recruitment of employees or offering of employment, such as failing to disclose, in a format and language accessible to the worker, basic information or making material misrepresentations during the recruitment of employees regarding the key terms and conditions of employment, including wages and fringe benefits, the location of work, the living conditions, housing and associated costs (if employer or agent provided or arranged), any significant cost to be charged to the employee, and, if applicable, the hazardous nature of the work;
- Use recruiters that do not comply with local labour laws of the country in which the recruiting takes place;
- Charge employee recruitment fees;
- Where housing is provided, provide or arrange housing that fails to meet the host country housing and safety standards; or
- If required by law or contract, fail to provide an employment contract, recruitment agreement, or other required work document in writing.

Ecolab's directors, officers, employees, and Suppliers are responsible for complying with this Policy, and Ecolab includes the substance of this Policy in applicable contracts with Suppliers.

Any violation of the Ecolab Policy could result in disciplinary action, up to and including removal from a contract, reduction in benefits, termination of a business relationship, or termination of employment. Any credible information regarding a potential violation of this Policy, whether discovered by an Ecolab employee or a Covered Entity, must be promptly reported to a manager, the Human Resources Department, or to the Law Department by phone, email, or in person. Alternatively, violations may be reported anonymously through the Company's toll-free Code of Conduct Helpline or online reporting. Any manager or Human Resources personnel receiving notification of a potential violation of this Policy must immediately report the matter to the Law Department. The Ecolab Policy also prohibits retaliation against those who make reports of misconduct and prohibit interfering with employees' cooperation with Government authorities investigating allegations of prohibited activity.

b. Verification of Supplier Practices

To evaluate and address risks of human trafficking and slavery in its supply chains, Ecolab developed a supplier ethical assessment that Suppliers in parts of Ecolab's business where there is an elevated risk of slavery and human trafficking complete to verify compliance with Ecolab's ethical sourcing requirements. Ecolab has required such suppliers in the chemical, packaging, equipment and contract manufacturing categories to complete the assessment, and we plan to expand the number and scope of suppliers required to complete the assessment within the next three years. Suppliers are questioned not

only on their policies, but on management practices and specific performance related to protection of employees' human rights and prevention and elimination of trafficking and slavery.

Ecolab's Global Procurement Team monitors suspected incidents of human trafficking or modern slavery which are identified by governmental agencies such as the U.S. Customs & Border Patrol's (CBP's) Withhold Release Orders.

In 2023, we expanded our Forced Labour survey targeting a total 141 suppliers and 2.4% of our global spend that we believed were of higher risk based on location, commodity and spend. Suppliers were questioned on their internal policies, management practices and specific performance related to protection of employees' human rights and prevention and elimination of trafficking and slavery. The survey was translated into English and Chinese since half of our targeted suppliers were located in China. We also partnered with Ecolab's Greater China team to assist with missing contact information and escalate any non-responses to the ethical sourcing survey.

60% of suppliers responded to our survey and/or had a human rights policy addressing Forced/Child Labour. The suppliers that did not have a policy, were willing to provide a contractual guarantee that the products sourced from them were not produced using forced labour. This covered 86% of the overall spend that was targeted from this survey.

These results will be shared with key stakeholders so there can be alignment on continuous improvement opportunities to further enhance our program.

c. Supplier, Contractor and Employee Accountability

Ecolab's employees are held internally accountable for ensuring that Ecolab meets its standards regarding slavery and trafficking through Ecolab's Code of Conduct and Global Anti-Human Trafficking Policy. The Code of Conduct requires employees and contractors to engage in ethical source selection. It also makes clear that compliance with applicable government regulations and Company policies and procedures is required of all Ecolab suppliers, agents and consultants. The Global Anti-Human Trafficking Policy provides additional detail regarding the specific requirements and prohibitions on Ecolab directors, officers and employees, as well as agents, subcontractors, suppliers, distributors and vendors with respect to prevention of trafficking-related activities.

We have established a Code of Conduct hotline to facilitate reporting of potential violations by internal and external stakeholders. Any concerns flagged through the ethical sourcing survey or Code of Conduct hotline are fully investigated, and mitigation steps – such as capacity-building, training and or monitoring – are put in place to improve supplier performance and eliminate risk. If significant and urgent concerns are identified that cannot be remediated, suppliers are removed from Ecolab's approved list.

d. Training

To reinforce supplier expectations internally, we conduct an online, annual training for Supply Chain, Research and Development and Regulatory Affairs associates to help them identify environmental, ethical and labor concerns when interacting with suppliers. This training encourages associates to report concerns via the Code of Conduct hotline. Results from the training are shared with leadership and utilized to identify additional training needs.

Ecolab plans to evaluate opportunities to enhance training on modern slavery in the next year, including to provide more targeted training to Supply Chain and other employees who work in or with countries or products where the risks of modern slavery are elevated, such as chemical raw materials in China or agricultural raw materials from Malaysia or Indonesia.

5. Assessment of the effectiveness of actions taken to reduced risks of forced and child labour

Ecolab, like most corporations, is relatively early in its process of assessing the effectiveness of its actions to combat modern slavery in its supply chain. Legislation like Canada’s *Fighting Against Forced Labour and Child Labour in Supply Chains Act* has focused needed attention on this topic, and as standard measures or assessment tools are developed, Ecolab plans to enhance its process for assessing the effectiveness of its actions. Ecolab entities also report on actions taken to address risks of forced labour under the *California Transparency in Supply Chains Act*, the *UK Modern Slavery Act* and the *Australia Modern Slavery Act*.

6. Consultation with affiliated entities

The Company worked closely with global parent company Ecolab Inc. in developing this statement, because the Global Supply Chain team at Ecolab Inc. headquarters oversees implementation of the Ecolab Global Anti-Slavery Policy and can monitor the global supply chains of the company and its global affiliates and further enhance Ecolab’s global efforts to ensure against modern slavery in its supply chains. The entities owned or controlled by the Company are non-operational and thus do not have any independent supply chains to which the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* would apply.

Ecolab Inc. and its Canadian affiliate Ecolab Co. Compagnie Ecolab are committed to combatting forced labour and look forward to working with our suppliers, customers and governmental authorities worldwide to enhance the effectiveness of our efforts and, ultimately, to eradicate forced labour and child labour.

ATTESTATION:

In accordance with the requirements of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act*, SC 2023, c 9, and in particular section 11 thereof, I attest that I have reviewed the information contained in the 2023 report for Ecolab Co. Compagnie Ecolab, and I have the authority to bind Ecolab Co. Compagnie Ecolab. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.

Signature: Chandan Kler
Printed Name: Chandan kler
Title: Director Human Resources - Canada
Date: May 28, 2024