ECOLAB®

Policy Statement on Conflict Minerals

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, comply with laws and regulations, and follow a rigorous Code of Conduct.

Ecolab supports the efforts of human rights organizations to end violence and atrocities in Central Africa (the Democratic Republic of Congo (DRC) and nine adjoining countries: Republic of Congo, Central Africa Republic, South Sudan, Zambia, Angola, Tanzania, Burundi, Rwanda and Uganda).

It has been widely reported that the major driver of this violence is the natural abundance of the minerals tin, tungsten, tantalum and gold, now referred to as "conflict minerals." Armed groups fight for control of mines in this region and use forced labor to mine and sell the minerals, which in turn funds ongoing violence.

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

Ecolab will file the necessary documentation prior to the regulation deadlines. We have initiated a process that meets the Organisation for Economic Co-operation and Development (OECD) framework to comply with this regulation. This includes establishing compliance requirements for our direct suppliers regarding conflict minerals, implementing controls and reporting, undertaking appropriate sourcing efforts, and providing our customers the data necessary to facilitate their SEC reporting.

Ecolab will align its efforts to practices established by industry peers – including the Electronics Industry Citizenship Coalition (EICC) and Global e-Sustainability Initiative (GeSI) – to enable companies to source conflict-free minerals.
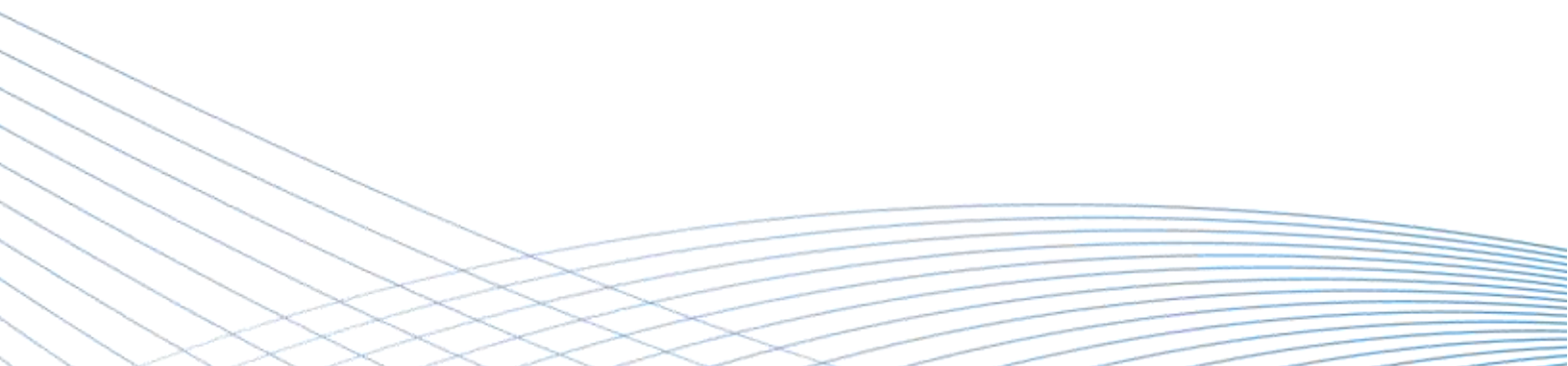
Expectations for Suppliers

In support of Ecolab's policy on conflict minerals, suppliers are expected to supply materials to Ecolab that are "DRC Conflict-Free". DRC includes the countries of Democratic Republic of Congo, Republic of Congo, Central Africa Republic, South Sudan, Zambia, Angola, Tanzania, Burundi, Rwanda and Uganda.

Suppliers are expected to adopt policies and management systems with respect to conflict minerals and to require their suppliers to adopt similar policies and systems. Ecolab expects suppliers to establish their own due diligence program to ensure conflict-free supply chains.

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

Under the definition of "DRC Conflict-Free," products supplied to Ecolab:

1. Do not contain tantalum, tin, tungsten or gold (3TG) as elements necessary to their production or functionality, or,

2. If products supplied to Ecolab do contain these minerals, the minerals must originate outside the DRC, come from scrap or recycled sources, or be supplied from smelters that have been validated by an independent private sector party to be conflict-free. Certified conflict-free smelters are validated as compliant to the EICC (Electronic Industry Citizenship Coalition) conflict free smelter (CFS) protocol using the CFS Compliant Smelter List. Through the CFS protocol, smelters are audited globally; the list of compliant smelters and refiners is posted at www.conflictfreesmelter.org.

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