

Ecolab Pty. Ltd.
Australia Modern Slavery Act Statement
May 2024

1. Identify the reporting entity.

Ecolab Pty. Ltd. (the “Company”) is providing this statement in compliance with the Australia Modern Slavery Act 2018 (No. 153, 2018). The Company incorporated in Australia as a private company in 1964, Australia Business Number 59 000 449 990, and 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. Describe the reporting entity’s structure, operations and supply chains.

a. Structure

i. Global Structure

Ecolab Pty. Ltd. 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
- Europe
- Asia Pacific
- Latin America
- India, Middle East, Africa
- Greater China

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

- **Global Industrial** includes the Water, Food & Beverage, Paper, and Downstream 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 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 Ecolab Pty. Ltd. in Australia

Ecolab Pty. Ltd. manufactures, distributes and sells products and provides services in Australia under business names including Ecolab, Nalco Water, Ecolab Pest Elimination, Cleantec, Kay Chemical, and Gallay Medical & Scientific. Ecolab Pty. Ltd. has five subsidiaries, including Ecolab (Fiji) Pty Limited, Ecolab AU2 Pty Ltd, Gallay Medical & Scientific Pty Ltd, and GallayTrac Pty. Ltd. None of these five Australian subsidiaries sells, manufactures, processes or distributes any products. Gallay Medical & Scientific was an independent company acquired by Ecolab in 2019, and its business was integrated directly into Ecolab Pty. Ltd. in 2020.

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.

In December 2021, Ecolab acquired Purolite, a leading and fast-growing global provider of high-end ion exchange resins for the separation and purification of solutions for pharmaceutical and industrial applications. Headquartered in King of Prussia, Pennsylvania, Purolite operates in more than 30 countries, including Australia. Purolite is now part of Ecolab's Life Sciences operating segment.

ii. Australian Operations

Ecolab Pty. Ltd. employs approximately 894 people in Australia, approximately 52% in sales and service, 12% in manufacturing and distribution, and 36% in other functions. The Company operates five manufacturing facilities in Australia, each supporting our global institutional and industrial business segments, including facilities in Cheltenham, Darra, Kwinana, Canning Vale and Revesby. Each of these manufacturing facilities has an accompanying warehouse, and there are seven additional warehouses leased by Ecolab Pty. Ltd. The Company manufactures, distributes, processes and/or sells products in Australia under business names including Ecolab, Nalco Water, Ecolab Pest Elimination, Cleantec, Kay Chemical, and Gallay Medical & Scientific.

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, we purchase more than 10,000 raw materials, with the largest single raw material representing less than 4% of raw material purchases. Our raw materials, except for a few specialized chemicals that we manufacture, 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. Describe the risks of modern slavery practices in operations and supply chains.

a. Overview of modern slavery and the anti-slavery effort

An estimated 50 million people worldwide were victims of modern slavery in 2021, with 28 million of those victims subject to forced labor. Of the 28 million people estimated to be subject to forced labor, 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. They have found that the risks of modern slavery 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 Australian affiliate Ecolab Pty. Ltd., to conduct more targeted assessment of their operations and global supply chains in support of the effort to eliminate modern slavery.

b. Risks of modern slavery 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 modern slavery within our operations or our industry sector. Nonetheless, Ecolab and the Company remain vigilant for indications of modern slavery within our operations and industry, particularly in higher risk countries identified by non-governmental organizations and the U.S. Department of Labor.

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 labor – 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 Labor issues an annual List of Goods Produced by Child Labor or Forced Labor, which is generally consistent with lists issued by organizations such as Walk Free Foundation. The 2022

U.S. Department of Labor List identifies 159 goods produced by child labour and/or forced labour in 78 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 labor at U.S. ports unless the producer can demonstrate the goods were not manufactured with forced labor. 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. Describe the actions taken 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 labor 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 labor 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 labor 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 in order 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 Labor 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 Labor. 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 labor. 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. Describe how the reporting entity assesses the effectiveness of these actions.

Ecolab’s Compliance Unit is responsible for steering human rights topics. This group 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. Based on the results of these processes, we will adapt and strengthen our actions to continually improve our response to modern slavery.

We have also engaged outside council to evaluate our processes and make recommendations to ensure compliance with upcoming legislation such as the Corporate Sustainability Due Diligence Directive (commonly referred to as the CS3D).

6. Describe the process of consultation with any owned or controlled entities.

Ecolab Pty. Ltd. 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 Ecolab Pty. Ltd. are non-operational and thus do not have any independent supply chains to which the Modern Slavery Act would apply.

7. Provide any other relevant information

Ecolab Inc. and its Australian affiliate Ecolab Pty. Ltd. are committed to combatting modern slavery and look forward to working with our suppliers, customers and governmental authorities worldwide to enhance the effectiveness of our efforts and, ultimately, to eradicate modern slavery.

A handwritten signature in black ink, appearing to be 'James Sullivan', written in a cursive style.

James Sullivan