

GIFTS & ENTERTAINMENT POLICY FOR GLOBAL SUPPLY CHAIN

Purpose

- ▲ At Ecolab, we want all of our business transactions to be free of actual, or even apparent, improper influence. Because of this, we restrict the ability of our Global Supply Chain employees to give or receive gifts and entertainment.
- ▲ The purpose of this Gifts and Entertainment Policy for Global Supply Chain is to set forth our specific limitations on giving and receiving gifts and entertainment for employees involved in procurement activities.

Scope

This policy applies to all employees within the Global Supply Chain organization.

Policy

Gifts

- ▲ Giving Gifts
 - Global Supply Chain employees cannot give gifts to suppliers no matter how small the dollar value.
- ▲ Accepting Gifts
 - Global Supply Chain employees cannot accept gifts from suppliers no matter how small the dollar value.
 - If a gift is unintentionally received (e.g. through the mail or e-mail)
 - Contact your manager for the proper disposition of the gift (for example, sharing a gift basket within the department or returning the gift to the supplier). In all cases the supplier should be notified of our policy.
 - Cash, gift cards, electronic vouchers, cash equivalents or similar items are never allowed.
- ▲ Gifts include, but are not limited to:
 - Cash or cash equivalents (e.g. gift cards)
 - Tickets to a sporting or concert event
 - Goods such as wine or fruit baskets and holiday baskets
 - Company logo trinkets or wear (e.g. coffee cups, notepads, polo shirts)
 - Prizes
 - Transportation
 - Trips
 - Free services

- Lodging
- Special favors

Meals and Entertainment

- ▲ Global Supply Chain employees cannot give to, or receive from suppliers, meals or entertainment no matter how small the value except as provided below:
 - Meals must have a legitimate business purpose (i.e., a business meal with a supplier to discuss Ecolab business);
 - Meals must be modest (not extravagant) under local standards;
 - Expenses must be accurately and adequately documented, include business purpose, value and attendees;
 - Meals with the same supplier should not be frequent;
 - Only those with a bona-fide business reason for being present should be included (do not include spouses or non-business guests); and
 - Otherwise follow the Ecolab Global Travel and Expense Policy

Responsibility

It is the responsibility of all Global Supply Chain employees to comply with this policy.

It is the responsibility of all Global Supply Chain managers to ensure that any expenses incurred by their employees that are relevant to this policy, comply with this policy.

References

This policy is intentionally more restrictive than the relevant language in the Ecolab Global Travel and Expense Policy.

Version #	Date	Description	Revised by
1	11/20/2014	Gifts & Entertainment Policy for Global Supply Chain	Global Procurement