



Political Contribution Policy

Policy Statement

No corporate funds, assets or anything of value may be paid or furnished, directly or indirectly, to a political party, political candidate or incumbent, political action committee, or in support of "soft money" contributions or "issue advocacy" except if legally permissible and if approved in advance in writing by the:

- Chief Executive Officer;
- Chief Financial Officer; and
- General Counsel.

All of the Corporation's contributions will promote the interests of Ecolab and will be made without regard for the private political preferences of its officers and executives.

No political contributions by individual employees may be made in the name of Ecolab or be reimbursed by it, directly or indirectly.

Questions regarding whether goods or services to be contributed may be something of value should be directed to the General Counsel.

Corporate contributions to candidates for federal election are illegal. ECOPAC, the Ecolab Political Action Committee, is the vehicle designated to make contributions to political candidates, campaign committees or political parties and organizations in connection with election to federal office. ECOPAC contributions are funded by voluntary personal contributions from employees. However, corporate funds and assets may, as permitted by law, be used for administrative support of ECOPAC.

Corporate contributions to state and local candidates may be legal in some states but illegal in others. Expenditures of this nature must be approved in advance by the Ecolab committee, comprised of the above-designated officers, which administers corporate funds used for this purpose.

The Governance Committee of the Corporation's Board of Directors will review this policy as well as a report of corporate contributions on an annual basis and a report of contributions will be posted to the Corporation's web site on a semi-annual basis. Additionally, the Corporation will report annually on its web site on its adherence to the policy and related provisions of its Code of Conduct.

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