2014 CORPORATE SUSTAINABILITY REPORT GRI INDEX



GLOBAL REPORTING INITIATIVE CONTENT INDEX

This report was prepared in alignment with the Global Reporting Initiative's G4 Core Sustainability Reporting Guidelines. For more information, please visit <u>globalreporting.org</u>.

G4 GENERAL STANDARD DISCLOSURES

Strategy and Analysis

PROFILE DISCLOSURE	DESCRIPTION	REPORTED	CROSS-REFERENCE/ DIRECT ANSWER
G4-1	Statement from the organziation's most senior decision-maker	Fully	2014 Corporate Sustainability Report Summary pages 5-6
G4-2	Description of key impacts, risks and opportunities	Fully	Page 18, 2014 Sustainability Report Summary pages 5-6 and CDP submission sections 2, 5 and 6

Organizational Profile

PROFILE DISCLOSURE	DESCRIPTION	REPORTED	CROSS-REFERENCE/ DIRECT ANSWER
G4-3	Name of the organization	Fully	Ecolab
G4-4	Primary brands, products and services	Fully	Ecolab's 2014 Annual Report and Form 10-K
G4-5	Location of Ecolab headquarters	Fully	Worldwide Headquarters 370 Wabasha St. N., St. Paul, MN 55102
G4-6	Number of countries where the organization operates and names of countries where the organization has significant operations or that are specifically relevant to the sustainability topics covered in the report	Fully	Ecolab's 2014 Annual Report and Form 10-K
G4-7	Nature of ownership and legal form	Fully	Ecolab's 2014 Annual Report and Form 10-K
G4-8	Markets served	Fully	Ecolab's 2014 Annual Report and Form 10-K
G4-9	Scale of the organization	Partially	Page 18
G4-10	Total number of employees	Fully	Page 19

PROFILE DISCLOSURE	DESCRIPTION	REPORTED	CROSS-REFERENCE/ DIRECT ANSWER
G4-11	Percentage of total employees covered by collective bargaining agreements	Partially	Page 20
G4-12	Description of the organization's supply chain	Fully	Page 20
G4-13	Significant changes during the reporting period regarding the organization's size, structure, ownership or supply chain	Fully	Pages 20-21
G4-14	Whether and how the precautionary approach or principle is addressed by the organization	Fully	Page 21
G4-15	List externally developed economic, environmental and social charters, principles or other initiatives to which the organization subscribes or it endorses	Fully	Page 22
G4-16	List memberships of associations and national or international advocacy organizations in which the organization is engaged	Fully	Page 22

Identified Material Aspects and Boundaries

PROFILE DISCLOSURE	DESCRIPTION	REPORTED	CROSS-REFERENCE/ DIRECT ANSWER
G4-17	List of all entities included in the organization's consolidated financial statements or equivalent documents	Fully	Ecolab's 2014 Annual Report and Form 10-K
G4-18	Explanation for the process of defining report content and aspect boundaries, and how the organization has implemented the reporting principles for defining report content	Fully	Page 12
G4-19	List of all the material aspects identified in the process for defining report content	Fully	Page 15
G4-20	Aspect boundary within the organization for each material aspect	Fully	Page 15
G4-21	Aspect boundary outside the organization for each material aspect	Fully	Page 15
G4-22	Effect of any restatements of information provided in previous reports and the reasons for such restatements	Fully	Pages 16-17
G4-23	Significant changes from previous reporting periods in the scope and aspect boundaries	Fully	Page 15

Stakeholder Engagement

PROFILE DISCLOSURE	DESCRIPTION	REPORTED	CROSS-REFERENCE/ DIRECT ANSWER
G4-24	List of stakeholder groups engaged by the organization	Fully	Pages 13-14
G4-25	Basis for identification and selection of stakeholders with whom to engage	Fully	Pages 13-14
G4-26	Organization's approach to stakeholder engagement	Fully	Pages 13-14
G4-27	Key topics and concerns that have been raised through stakeholder engagement and how the organization has responded to those key topics and concerns	Fully	Page 22

Report Profile

PROFILE DISCLOSURE	DESCRIPTION	REPORTED	CROSS-REFERENCE/ DIRECT ANSWER
G4-28	Reporting period	Fully	1 January- 31 December 2014
G4-29	Date of most recent previous reports	Fully	2013
G4-30	Reporting cycle	Fully	Annual
G4-31	Contact point for questions regarding the report or its contents	Fully	sustainability® ecolab.com
G4-32	"In accordance" option the organization has chosen	Fully	Page 2
G4-33	Organization's policy and current practice in regards to seeking external assurance for the report	Fully	Page 23; Pages 80-81

Governance

PROFILE DISCLOSURE	DESCRIPTION	REPORTED	CROSS-REFERENCE/ DIRECT ANSWER
G4-34	Governance structure of the organization	Fully	Page 24 and Ecolab's 2014 Annual Report and Form 10-K

Ethics and Integrity

PROFILE DISCLOSURE	DESCRIPTION	REPORTED	CROSS-REFERENCE/ DIRECT ANSWER
G4-56	Organization's values, principles, standards and norms of behavior	Fully	Pages 24-25

G4 SPECIFIC STANDARD DISCLOSURES

Economic

PROFILE DISCLOSURE	DESCRIPTION	REPORTED	CROSS-REFERENCE / DIRECT ANSWER
G4-EC DMA	Disclosure of management approach		Ecolab's 2014 Annual Report and Form 10-K
G4-EC1	Direct economic value generated and distributed	Partially	2014 Annual Report and Form 10-K
G4-EC2	Financial implications and other risks and opportunities for the organization's activities due to climate change	Fully	Ecolab's 2014 Annual Report, Form 10-K and Ecolab's submission to the CDP
G4-EC3	Coverage of Ecolab's defined benefit plan obligations	Partially	Ecolab's 2014 Annual Report and Form 10-K
G4-EC4	Financial assistance received from government	Fully	Page 26
G4-EC5	Ratio of standard entry-level wage by gender compared to local minimum wage at significant locations of operations	Unable to report	Data not available
G4-EC6	Proportion of senior management hired from the local community at significant locations of operation	Fully	Page 26
G4-EC7	Development and impact of infrastructure investments and services supported	Fully	Page 27
G4-EC8	Significant indirect economic impacts	Partially	Page 27
G4-EC9	Proportion of spending on local suppliers at significant locations of operation	Fully	Page 27

Environmental

PROFILE DISCLOSURE	DESCRIPTION	REPORTED	CROSS-REFERENCE/ DIRECT ANSWER
G4-EN DMA	Disclosure of management approach		Pages 29-30
G4-EN1	Materials used by weight or volume	Fully	Page 30
G4-EN2	Percentage of materials used that are recycled input materials	Fully	Pages 30-31
G4-EN3	Energy consumption within Ecolab	Fully	Pages 31-32
G4-EN4	Energy consumption outside Ecolab	Fully	Page 33
G4-EN5	Energy intensity	Fully	Page 34
G4-EN6	Reduction of energy consumption	Fully	Page 34
G4-EN7	Reduction in energy requirements of products and services	Fully	Pages 35-36
G4-EN8	Total water withdrawal by source	Fully	Pages 36-37
G4-EN9	Water sources significantly affected by withdrawal of water	Fully	Pages 38-39
G4-EN10	Percentage and total volume of water recycled and reused	Fully	Page 39
G4-EN11	Operational sites owned, leased, managed in or adjacent to protected areas and areas of high biodiversity value outside protected areas	Fully	Page 40
G4-EN12	Description of significant impacts of activities, products and services on biodiversity in protected areas and areas of high biodiversity value outside protected areas	Fully	Page 40
G4-EN13	Habitats protected or restored	Fully	Page 40
G4-EN14	Total number of IUCN red-list species and national conservation list species with habitats in areas affected by operations	Fully	Page 40
G4-EN15	Direct greenhouse gas (GHG) emissions (Scope 1)	Fully	Page 41
G4-EN16	Direct GHG emissions (Scope 1)	Fully	Page 41
G4-EN17	Other indirect GHG emissions (Scope 3)	Fully	Page 42

PROFILE DISCLOSURE	DESCRIPTION	REPORTED	CROSS-REFERENCE/ DIRECT ANSWER
G4-EN18	GHG emissions intensity	Fully	Page 42
G4-EN19	Reduction of GHG emissions	Fully	Page 43
G4-EN20	Emissions of ozone-depleting substances (ODS)	Fully	Page 43
G4-EN21	NOx, SOx and other significant air emissions	Fully	Page 44
G4-EN22	Total water discharge by quality and destination	Fully	Pages 45-46
G4-EN23	Total weight of waste by type and disposal method	Fully	Pages 47-49
G4-EN24	Total number and volume of significant spills	Fully	Page 49
G4-EN25	Weight of hazardous waste transported, imported, exported, treated and shipped internationally	Fully	Page 49
G4-EN26	Identity, size, protected status and biodiversity value of water bodies and related habitats significantly affected by the organization's discharges of water and runoff	Fully	Page 50, Form 10-K and Ecolab's submission to the CDP
G4-EN27	Extent of impact mitigation of the environmental impacts of products and services	Fully	2014 Corporate Sustainability Report Summary pages 38-39
G4-EN28	Percentage of products sold and their packaging materials that are reclaimed	Partially	Refer to EN2
G4-EN29	Monetary value of significant fines and total number of nonmonetary sanctions for noncompliance with environmental laws and regulations	Fully	Page 50
G4-EN30	Significant environmental impacts of transporting products and other goods and materials for the organization's operations and transporting members of the workforce	Fully	Refer to EN4 and EN17
G4-EN31	Total environmental protection expenditures and investments	Unable to report	Data not available
G4-EN32	Percentage of new suppliers screened using environmental criteria	Fully	Page 50
G4-EN33	Significant actual and potential negative environmental impacts in the supply chain and actions taken	Partially	Page 51
G4-EN34	Number of grievances about environmental impacts filed, addressed and resolved through formal grievance mechanisms	Fully	Page 51

Social: Labor Practices and Decent Work

PROFILE DISCLOSURE	DESCRIPTION	REPORTED	CROSS-REFERENCE/ DIRECT ANSWER
G4-LA DMA	Disclosure of management approach		Pages 52-53
G4-LA1	Total number and rates of new employee hires and employee turnover	Partially	Pages 54-55
G4-LA2	Benefits provided to full-time employees that are not provided to temporary or part-time employees	Partially	Page 56
G4-LA3	Return to work and retention rates after parental leave	Partially	Page 56
G4-LA4	Minimum notice periods regarding operational changes	Partially	Page 56
G4-LA5	Percentage of total workforce represented in formal joint management-worker health and safety committees that help monitor and advise on occupational health and safety programs	Unable to report	Data not available
G4-LA6	Type of injury and rates of injury, occupational diseases, lost days and absenteeism and total number of work-related fatalities	Partially	Page 57
G4-LA7	Workers with high incidence or high risk of diseases related to their occupation	Fully	Page 58
G4-LA8	Health and safety topics covered in formal agreements with trade unions	Partially	Page 58
G4-LA9	Average hours of training per year per employee	Partially	Page 58
G4-LA10	Programs for skill management and lifelong learning that support the continued employability of employees by assisting them in managing career endings	Fully	Page 59
G4-LA11	Percentage of employees receiving regular performance and career-development reviews	Fully	Page 60
G4-LA12	Composition of governance bodies	Partially	Pages 61-62
G4-LA13	Ratio of basic salary and remuneration of women to men	Unable to report	We do not report on this disclosure because the information is proprietary.
G4-LA14	Percentage of new suppliers screened using labor practices criteria	Fully	Page 62

PROFILE DISCLOSURE	DESCRIPTION	REPORTED	CROSS-REFERENCE/ DIRECT ANSWER
G4-LA15	Significant actual and potential negative impacts for labor practices in the supply chain and actions taken	Fully	Page 63
G4-LA16	Number of grievances about labor practices filed, addressed and resolved through formal grievance mechanisms	Unable to report	We do not report on this disclosure because the information is proprietary.

Social: Human Rights

PROFILE DISCLOSURE	DESCRIPTION	REPORTED	CROSS-REFERENCE/ DIRECT ANSWER
G4-HR DMA	Disclosure of management approach		Page 64
G4-HR1	Number and percentage of significant investment agreements and contracts that include human-rights clauses or that underwent human-rights screening	Unable to report	We do not have information to address this disclosure.
G4-HR2	Total hours of employee training on human-rights policies or procedures concerning aspects of human rights that are relevant to operations	Fully	Page 65
G4-HR3	Total number of incidents of discrimination	Unable to report	We do not report on this disclosure because the information is proprietary.
G4-HR4	Operations and suppliers identified in which the right to exercise freedom of association and collective bargaining may be violated or at significant risk	Partially	Page 65
G4-HR5	Operations and suppliers identified as having significant risk for incidents of child labor and measures taken to contribute to the abolition of child labor	Fully	Page 65
G4-HR6	Operations and suppliers identified as having significant risks for incidents of forced or compulsory labor and measures to contribute to the elimination of all forms of forced or compulsory labor	Fully	Page 66
G4-HR7	Percentage of security personnel trained in the organization's human-rights policies or procedures that are relevant to operations	Fully	Page 66
G4-HR8	Total number of violations involving rights of indigenous peoples and actions taken	Unable to report	We do not report this disclosure because the information is proprietary.

PROFILE DISCLOSURE	DESCRIPTION	REPORTED	CROSS-REFERENCE/ DIRECT ANSWER
G4-HR9	Total number and percentage of operations that have been subject to human-rights reviews or impact assessments	Partially	Page 67
G4-HR10	Percentage of new suppliers screened using human- rights criteria	Fully	Page 68
G4-HR11	Significant actual and potential negative human- rights impacts in the supply chain	Fully	Page 68
G4-HR12	Number of grievances about human-rights impacts filed, addressed and resolved through formal grievance mechanisms	Unable to report	We do not report on this disclosure because the information is proprietary.

Social: Society

PROFILE DISCLOSURE	DESCRIPTION	REPORTED	CROSS-REFERENCE/ DIRECT ANSWER
G4-SO DMA	Disclosure of management approach		Page 69
G4-S01	Percentage of operations with implemented local community engagement, impact assessments and development programs	Partially	Pages 70-72
G4-S02	Operations with significant actual and potential negative impacts on local communities	Fully	Page 73
G4-S03	Total number and percentage of operations assessed for risks related to corruption and significant risks identified	Fully	Page 73
G4-S04	Communication and training on anticorruption policies and procedures	Fully	Page 73
G4-S05	Confirmed incidents of corruption and actions taken	Unable to report	We do not report this disclosure because the information is proprietary.
G4-S06	Total value of political contributions	Fully	Page 74
G4-S07	Total number of legal actions for anticompetitive behavior, antitrust and monopoly practices and their outcomes	Fully	Page 74
G4-S08	Monetary value of significant fines and total number of nonmonetary sanctions for noncompliance with laws and regulations	Fully	Page 74

PROFILE DISCLOSURE	DESCRIPTION	REPORTED	CROSS-REFERENCE/ DIRECT ANSWER
G4-S09	Percentage of new suppliers screened using criteria for impacts on society	Partially	Page 74
G4-S010	Significant actual and potential negative impacts on society in the supply chain and actions taken	Fully	Page 75
G4-S011	Number of grievances about impacts on society filed, addressed and resolved through formal grievance mechanisms	Unable to report	We do not report on this disclosure because the information is proprietary.

Social: Product Responsibility

PROFILE DISCLOSURE	DESCRIPTION	REPORTED	CROSS-REFERENCE/ DIRECT ANSWER
G4-PR DMA	Disclosure of management approach		Pages 76-77
G4-PR1	Percentage of significant product and service categories for which health and safety impacts are assessed for improvement	Fully	Page 77
G4-PR2	Total number of incidents of noncompliance with regulations and voluntary codes concerning the health and safety impacts of products and services during their life cycles	Fully	Page 77
G4-PR3	Type of product and service information required by the organization's procedures for product and service information and labeling	Fully	Page 77
G4-PR4	Total number of incidents of noncompliance with regulations and voluntary codes concerning product and service information and labeling	Fully	Page 78
G4-PR5	Results of surveys measuring customer satisfaction	Fully	Page 78
G4-PR6	Sale of banned or disputed products	Partially	Page 78
G4-PR7	Total number of incidents of noncompliance with regulations and voluntary codes concerning marketing communications	Fully	Page 78
G4-PR8	Total number of substantiated complaints regarding breaches of customer privacy and losses of customer data	Fully	Page 79
G4-PR9	Monetary value of significant fines for noncompliance with laws and regulations concerning the provision and use of products and services	Fully	Page 79

MATERIALITY ASSESSMENT

APPROACH TO MATERIALITY

At Ecolab, sustainability is core to our business strategy. We deliver sustainable solutions that help companies around the world achieve business results while minimizing environmental and social impact. The work we do matters, and the way we do it matters to our employees, customers, investors and the communities in which we operate.

We know that our greatest impact on the world is through our customers. Our most material risks and opportunities directly relate to our ability to help our customers operate sustainably. Therefore, the parameters of our 2014 Corporate Sustainability Report have been established based on a strategic assessment of the issues that our stakeholders care most about, are of greatest relevance to our business strategy and impact our ability to deliver on our promise to make the world cleaner, safer and healthier.

This approach to materiality aligns with our corporate strategy to address some of the world's most pressing and complex challenges through our own operations and the solutions we provide to our customers.

MATERIALITY ASSESSMENT PROCESS

The Global Reporting Initiative (GRI) defines material issues as those that "have a direct or indirect impact on an organization's ability to create, preserve or erode economic, environmental and social value for itself, its stakeholders and society at large."

We employ a multifaceted process to determine our company's material issues in order to align materiality with our company's and customers' key business drivers. Ecolab's annual enterprise "Assessment of Significant Business Risks" provides the foundation for assessing the materiality of issues to our business. The annual assessment is conducted using a survey tool designed to identify strategic, operational, financial and compliance-related risks to the company. Risks are documented along with the likelihood and impact of their occurrence. An audit-services vice president manages the process, and the results are presented to the executive committee and Ecolab board of directors. The most significant business risks are reported publicly through the company's annual 10-K filing.

The risks and opportunities material to our business did not change significantly from the previous reporting period. Therefore, we utilized the materiality assessment conducted in 2013 to inform our 2014 reporting.

In 2013, we used the Assessment of Significant Business Risks as a foundation to conduct a rigorous process to analyze risks and opportunities specific to sustainability. Our strategic approach helped us better understand and measure against the issues that present material risks and opportunities to our company as they align with the interests of our stakeholders (primarily customers). Our formal sustainability-specific materiality assessment aimed to:

- Gather input on critical risk and opportunity drivers and sustainability issues across our businesses
- Evaluate the nature of specific impacts and our ability to affect the issues
- Provide context and review prioritized drivers for transparency and disclosure of sustainability risks and opportunities
- Identify gaps in our risk and opportunity assessment to inform our materiality-assessment process in subsequent years
- Suggest actions to enhance sustainability and corporate programs as well as improve our transparency in reporting

Our sustainability materiality process involves:

- Leveraging existing enterprise risk-management processes to align materiality with key business drivers
- Engaging diverse stakeholders to assess sustainability-specific material issues
- Identifying additional analysis needed in order to assign a high level of confidence to the risk and opportunity assessment
- Placing each risk and opportunity on a matrix to show relative impact and likelihood
- Sharing the results with Ecolab stakeholders for discussion and refinement
- Collating all information and data points gathered to prepare our annual materiality table to inform sustainability reporting and decision-making across the company

STAKEHOLDER ENGAGEMENT

In order to garner a comprehensive understanding of risks and opportunities, we engage a diverse set of stakeholders to assess the materiality of sustainability-specific issues. Our targeted stakeholder-engagement process includes employees, customers, investors and relevant external groups.

Employees

We strive to make Ecolab a place where talented and capable people are inspired, motivated and fully engaged in their work. Our associates drive innovation, support business growth and provide personally delivered service and on-the-ground support to more than one million customers. The perspectives of our associates are critical to our success and inform our business strategy.

- Assessment of Significant Business Risks: This annual enterprise risk assessment process includes interviews and surveys of leadership across business units and functions, including:
 - Operations heads across businesses
 - Human resources
 - Supply chain and procurement
 - RD&E and product development
 - Marketing
 - Finance, risk, legal and regulatory affairs
- Global Employee Engagement Survey: In Fall 2013, Ecolab conducted a global survey of approximately 43,000 employees. The survey was distributed in 36 languages (including English) to assess employee sentiment across 15 categories. Overall, 35,683 employees responded to the survey, achieving a very strong response rate of 83 percent. This complete survey was not conducted in 2014.

Customers

Our relationships with many of the world's biggest brands give us a unique perspective on the risks and opportunities facing a wide range of industries all around the world. We learn from our customers – the challenges they face and the results they desire – and we use this knowledge to drive innovation and help them achieve their business and sustainability goals. What matters to our customers matters to us. In addition to our daily interactions, we employed the following strategies to inform customer-specific risks and opportunities in 2014:

- Annual enterprise business reviews: Every year we conduct a thorough review of our partnerships with each customer to measure our impact over the past year and assess key business drivers to shape future strategies.
- Active participation in industry organizations, including the Food Marketing Institute, National Restaurant Association, Grocery Manufacturers Association, Consumer Specialty Products Association, AISE, American Cleaning Institute, Beverage Industry Environmental Roundtable, Sustainable Purchasing Leadership Council, Consumer Goods Forum, Practice Greenhealth and World Travel and Tourism Council.

Investment Community

As a publicly traded company, we place a priority on the opinions of our shareholders. We engage in dialogue with our stakeholders each year at our annual shareholder meeting.

Society

Our ability to provide and protect clean water, safe food, abundant energy and healthy environments is strengthened through our partnerships with reputable global NGOs. Through these partnerships, we further our understanding of global trends impacting our business, customers and communities around the world. In 2014, we actively engaged with relevant organizations, and these partnerships influenced our assessment of our company's risks and opportunities related to society.

Our NGO partnerships in 2014 included the UN Global Compact and CEO Water Mandate, Corporate Eco Forum, World Wildlife Fund, Alliance for Water Stewardship, The Nature Conservancy, World Resources Institute, Corporate Executive Board, the Sustainability Consortium and Corporate Eco Forum.

SUSTAINABILITY GOVERNANCE

Ecolab's sustainability strategy is governed by a Sustainability Executive Advisory Team (SEAT) made up of 10 members of the company's executive leadership. SEAT meets with the Corporate Sustainability Team on a quarterly basis and is responsible for operationalizing sustainability across the company, coordinating and communicating company policy and decision-making related to sustainability, setting annual goals and metrics for key sustainability priorities, sustainability outlook assessment, and risk management.

SUSTAINABILITY ISSUES MATERIAL TO ECOLAB

This materiality-assessment process results in a set of sustainability aspects that are of material significance to Ecolab. All aspects listed in our materiality diagram are deemed to be material to Ecolab, with impacts within and outside our organization.



ONGOING ASSESSMENT

The risks and opportunities we face are constantly evolving. Going forward, we will continue to strengthen, broaden and integrate our enterprise risk assessment and stakeholder engagement processes to better inform our analysis of the materiality of specific sustainability issues to Ecolab. This will include a more integrated approach to the enterprise risk assessment, and more formal and frequent engagement of stakeholders, including customers and NGOs.

REPORTING CHANGES AND RESTATEMENTS FOR 2014 REPORTING PERIOD: (1 JANUARY-31 DECEMBER 2014)

ADJUSTMENTS

Ecolab developed an inventory of greenhouse gas (GHG) emissions as part of our commitment to reducing our carbon footprint in 2007. In 2009, we expanded the primary inventory to include our other key operational environmental impacts of water used, wastewater discharged and waste disposed. During completion of 2014 inventories, we identified changes that impacted historical inventories resulting in a restating of our 2012 baseline to measure progress against our corporate goals.

Throughout 2014, data gaps were identified and corrected, which impacted historical inventories for each metric reported. We also continue to implement many new data-management collection processes to maintain our energy and water invoices for all owned and operationally controlled fixed facilities. This serves as another way to perform internal and third-party auditing of this data.

Globally, Ecolab had a 71 percent invoice-compliance rate in 2014, meaning that 71 percent of all energy and water invoices from all owned and operationally controlled fixed facilities were used to compile 2014 data. While this is down from 2013 (89 percent), we are focused on maintaining a full set of invoices for the majority of our largest contributor sites: we have a 99 percent invoice participation rate from the 20 percent of plants that make up 80 percent of our internal manufacturing sustainability footprint.

Net sales are adjusted to constant 2012 dollars to factor out inflation when normalizing Ecolab's emissions performance against the baseline year, following best-practices guidance from the GHG Protocol and EPA Climate Leaders. Ecolab's net sales are adjusted for inflation using Producer Price Indexes (PPI) from the Bureau of Labor Statistics.

GREENHOUSE GAS INVENTORY CHANGES

The following structural changes, which impact summary data for 2012 and 2013, were completed for the 2014 GHG inventory:

- Data gaps identified and adjusted in the 2012 and 2013 inventories, which impact previously
 reported summary data, including historical real estate data for global leased and owned
 locations, were updated to correct inaccurate building-area and building-type information. This
 primarily affected operationally controlled sites where energy use and subsequent emissions
 were previously estimated.
- We updated the emissions factors methodology for 2013 (and new baseline year of 2012) to use CO₂ only for international electricity, as the previous CH₄ and N₂O components were outdated. This removes the CH₄ and N₂O components. In addition, Ecolab began using local, regional averages for countries not specifically listed (e.g., previously Puerto Rico used the Jamaica emissions factor; this has been updated to use "Other Non-OECD Americas"). A comparison of before and after these changes were made showed a 0.23 percent decrease in Scope 2 electricity emissions (or 0.08 percent decrease with respect to the full inventory).

- A change was made to the emissions factors methodology for 2014 with respect to the Global Warming Potential (GWP) of CH₄ and N₂O. Ecolab now uses the IPCC 4th assessment values for GWP, in line with the US EPA factors. The CH₄ GWP has increased by 19 percent while the N₂O GWP has decreased by 4 percent. This change leads to a very minor difference in the overall CO₂e of the inventory due to the relatively small contribution that these minor gases make compared to CO₂. The revised GWPs are applied retrospectively for 2012 and 2013.
- Prior to the 2011 Ecolab-Nalco merger, Legacy Nalco light fleet drivers were included in a
 Personal Vehicle Allowance (PVA) program that allowed drivers to use their personal vehicles
 for business use and get reimbursed by the company. In 2012, the company began converting
 those drivers to the Ecolab Fleet Program, with a goal completion date of 2016. By the end of
 2014, 1,493 Legacy Nalco drivers had been converted. Since the PVA program contributed to
 Scope 3 emissions and the Ecolab Fleet Program contributes to Scope 1 emissions, a baseline
 adjustment was completed.

Ecolab has had its 2013 global Scope 1, 2 and 3 (United States and Europe business travel only) GHG emissions and global water consumption verified by a third party using the ISO 14064-3: Greenhouse Gases – Part 3 specification standard and the International Standard on Assurance Engagements (ISAE) 3000 for water consumption.

WATER, WASTEWATER AND WASTE INVENTORY CHANGES

Data gaps and corrections that impact 2012 and 2013 summary data were identified during completion of the 2014 water, wastewater and waste inventory:

 The historical real estate data for global leased and owned locations was updated to correct for inaccurate building-area and building-type information. This primarily affected operationally controlled sites where water, waste and effluent were estimated.

G4 GENERAL STANDARD DISCLOSURES

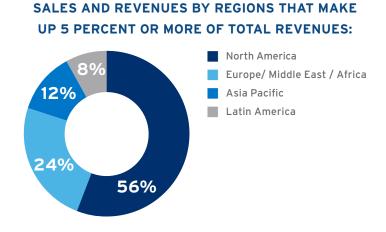
DESCRIPTION OF KEY IMPACTS, RISKS AND OPPORTUNITIES (G4-2)

Ecolab has a rigorous process of analyzing risks and opportunities related to social factors from employee engagement to human rights across business operations and our value chain. A comprehensive review, "Assessment of Significant Business Risks," is conducted using a survey tool designed to identify strategic, operational, financial and compliance-related risks to the company. Risks are documented along with the likelihood and impact of their occurrence each year. The results are presented to the Ecolab board of directors. Our chairman of the board and CEO is responsible for appropriate strategy adjustments.

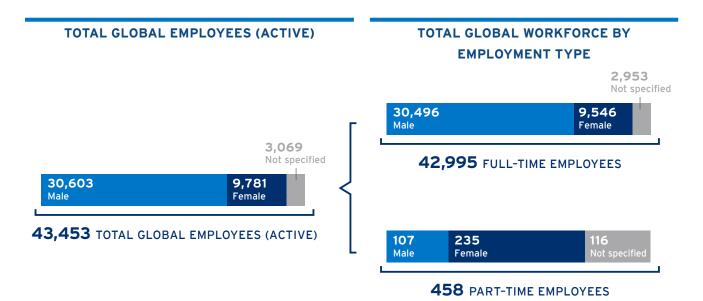
The most significant business risks are reported publicly through the company's annual 10-K filing, and specific business risks and opportunities are disclosed herein. The various indicators that we measure and report on in our annual Corporate Sustainability Report are material to our success. In addition, the principles of our company (available on our website: ecolab.com) reflect how we conduct business on a daily basis with a focus on economic, environmental, safety and social areas.

SCALE OF ORGANIZATION (G4-9)

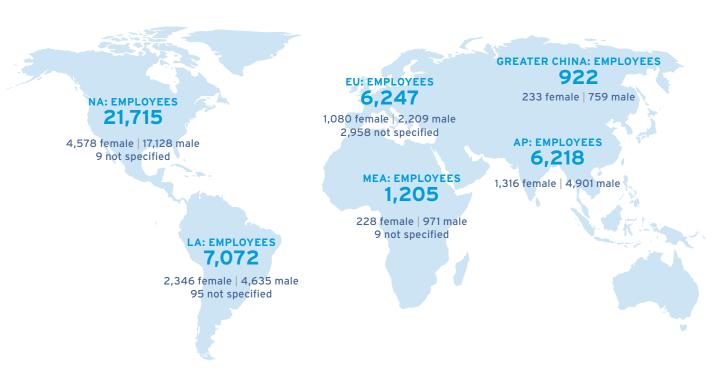
Total headcount, 2014: 47,000 (Annual Report) Revenue, 2014: \$14.280 billion (Net Sales)



TOTAL NUMBER OF EMPLOYEES (G4-10)



TOTAL GLOBAL WORKFORCE BY REGION



Ecolab does not have a substantial or materially significant portion of its workforce legally recognized as self-employed. Ecolab does not see a materially significant variation in its employee workforce.

^{*}Employment data in this disclosure is as of 31 December 2014 by region for NA, AP, GC, LA, MEA and legacy Nalco and Champion for Europe.

^{*}Employment data in this disclosure does not include legacy Ecolab EU employment data received after 31 June 2014.

PERCENTAGE OF TOTAL EMPLOYEES COVERED BY COLLECTIVE BARGAINING AGREEMENTS (G4-11)

We recognize employees' right to form or join unions and encourage them to make an informed decision on the matter. Where employees have chosen to be represented by a labor union, we fulfill our bargaining obligations as defined by law. Only a small percentage of our employees are currently covered under trade unions or collective-bargaining agreements.

In the United States, 471 employees are covered by collective-bargaining agreements. This is approximately .03 percent of the U.S. employees.

DESCRIPTION OF THE ORGANIZATION'S SUPPLY CHAIN (G4-12)

Ecolab operates an extensive, integrated global supply chain. Our manufacturing operations and supplier base serve the needs of customers across 170 countries. The company procures more than \$4.5 billion of direct raw material, contracts manufacturing and equipment from more than 12,000 suppliers worldwide and manages distribution through various channels to external customers across 1.3 million locations.

SIGNIFICANT CHANGES DURING THE REPORTING PERIOD REGARDING THE ORGANIZATION'S SIZE, STRUCTURE, OWNERSHIP OR SUPPLY CHAIN (G4-13)

We continued to pursue opportunities to grow key areas of our business through acquisition. During 2014, Ecolab made further investments to bolster our product and service offerings and market footprint. Below is a summary of significant 2014 changes:

- In December 2013, subsequent to the company's fiscal year end for international operations, the
 company completed the acquisition of AkzoNobel's Purate business ("Purate"). Headquartered
 in Sweden, Purate specializes in global antimicrobial water treatment. Pre-acquisition annual
 sales of the business were approximately \$23 million. The acquired business became part of the
 company's Global Industrial reportable segment during the first quarter of 2014.
- In March 2014, the company acquired AK Kraus & Hiller Schädlingsbekämpfung, one of Germany's leading commercial pest elimination service providers. Pre-acquisition annual sales of the business were approximately \$4 million. The business became part of the company's Other segment during the second quarter of 2014.
- In March 2014, the company purchased the remaining interest in a joint venture held in South Africa. The transaction was not significant to the company's operations.
- In June 2014, the company purchased the remaining interest in a joint venture in Indonesia. The transaction was not significant to the company's operations.
- In July 2014, the company obtained control of Emochem, a joint venture in the United Arab Emirates through an amendment in the related shareholder agreements. This amendment resulted in the company consolidating the entity and removing the related equity method investment. The transaction was not significant to the company's operations. As discussed in Note 3, the company recognized a \$5.0 million gain during the third quarter of 2014 as a result of this transaction.

- In July 2014, the company acquired the chemical division of AKJ Industries, a leading provider
 of chemical solutions in the coal industry in the U.S. Pre-acquisition annual sales of the business
 were approximately \$21 million. The business became part of the company's Global Industrial
 reportable segment during the third quarter of 2014.
- In September 2014, the company acquired certain assets from Oksa Kimya Sanayii. Based in Turkey, the transaction was not significant to the company's operations.
- In November 2014, the company acquired the dairy hygiene chemical businesses of EXL Laboratories, LLC and Hyprod Canada, providers of cleaning and sanitizing products for use on dairy farms in the U.S. and Canada. Pre-acquisition annual sales of the businesses were approximately \$25 million. The business became part of the company's Global Industrial reportable segment during the fourth quarter of 2014.

Subsequent Event Activity

- In December 2014, subsequent to the company's fiscal year end for international operations, the company entered into a licensing agreement and business acquisition with Aseptix Health Sciences NV. With pre-acquisition sales of less than \$1 million, the acquired business will become part of the company's Global Institutional reportable segment during the first quarter of 2015.
- Also in December 2014, subsequent to the company's fiscal year end for international operations, the company acquired Commercial Pest Control Pty Ltd, an Australian commercial pest control company. With pre-acquisition sales of less than \$1 million, the acquired business will become part of the company's Other segment during the first quarter of 2015.

WHETHER AND HOW THE PRECAUTIONARY APPROACH OR PRINCIPLE IS ADDRESSED BY THE ORGANIZATION (G4-14)

Ecolab identifies hazards, risks and impacts of our products through multiple mechanisms. For select products, we conduct testing to identify pertinent hazards. In instances where testing is not feasible, we follow applicable regulatory requirements and recommendations to identify and assign classifications. This approach is based on identifying pertinent hazards of our products' ingredients which are then used to identify product hazards. We follow the Globally Harmonized System of Classification and Labeling of Chemicals (GHS) criteria for classifying our ingredients and products.

In order to thoroughly assess our ingredients, we review publicly available information from reputable sources such as the United States Environmental Protection Agency (EPA), United States Agency for Toxic Substance and Disease Registry (ATSDR), World Health Organization (WHO) and European Chemicals Agency (ECHA). Additionally, we obtain proprietary information from our chemical suppliers. Since 2012, we have evaluated more than 1,600 substances using GHS criteria and these evaluations have resulted in our products having technically robust classifications. Our product risks are evaluated by multiple groups within Ecolab, including Toxicology, Industrial Hygiene, Transportation and Package Engineering. If risks are identified, appropriate mitigation measures are implemented. Finally, we use customer feedback to continuously assess our products. Customer feedback includes direct feedback from field representatives' interactions with customers and customer input received from our technical call centers and third party health and safety call centers.

EXTERNALLY DEVELOPED ECONOMIC, ENVIRONMENTAL AND SOCIAL CHARTERS, PRINCIPLES OR OTHER INITIATIVES TO WHICH THE ORGANIZATION SUBSCRIBES OR THAT IT ENDORSES (G4-15)

Ecolab subscribes to or endorses externally developed economic, environmental and social charters/principles, including the following:

- UN Global Compact and CEO Water Mandate: Ecolab became a signatory in 2012.
- CDP: Ecolab has participated in and reported to CDP since 2000.
- World Wildlife Fund (WWF) and Alliance for Water Stewardship (AWS): Since 2010, Ecolab has
 partnered with WWF and AWS to develop and launch the International Water Stewardship
 Standard. Ecolab is a founding partner of the AWS Standard.
- The Nature Conservancy: In 2014, Ecolab, through the Ecolab Foundation, made a \$2 million pledge to support The Nature Conservancy's Securing and Restoring Water Sources Around the Globe initiative.

Other notable associations we support include:

- Global Environmental Management Initiative (GEMI)
- International Organization for Standardization (ISO)
- American Cleaning Institute (ACI)
- Marcellus Shale Coalition
- National Association of Manufacturers
- Sustainable Purchasing Leadership Council

LIST OF MEMBERSHIPS IN ASSOCIATIONS AND NATIONAL OR INTERNATIONAL ADVOCACY ORGANIZATIONS IN WHICH THE ORGANIZATION IS ENGAGED (G4-16)

Industry and policy groups have a unique ability to influence standards, regulations and practices. Ecolab engages with a broad range of industry groups, sharing expertise and insights to help these membership organizations enhance sustainability leadership across their respective industries. In 2014, Ecolab actively participated in sustainability-related work groups within the following industry associations or groups: Food Marketing Institute, National Restaurant Association, Grocery Manufacturers Association, Consumer Specialty Products Association, AISE, American Cleaning Institute, Beverage Industry Environmental Roundtable, Sustainable Purchasing Leadership Council, Marcellus Shale Coalition, Practice Greenhealth, World Travel and Tourism Council, Global Food Safety Initiative, National Association of Manufacturers, American Chemistry Council, United States Council for International Business, Council of Great Lakes Industries, Democratic Governors Association, Republican Governors Association and Coalition for a Democratic Workplace.

KEY TOPICS AND CONCERNS THAT HAVE BEEN RAISED THROUGH STAKEHOLDER ENGAGEMENT AND HOW THE ORGANIZATION HAS RESPONDED TO THOSE KEY TOPICS AND CONCERNS (G4-27)

Refer to Materiality Narrative. Ecolab's key stakeholders include its customers, investors, community organizations (including NGOs and partners) and employees. Key topics and concerns consistently raised by these stakeholder groups are represented in our Materiality diagram, and correspondingly are addressed throughout our 2014 Corporate Sustainability Report.

EXTERNAL ASSURANCE (G4-33)

Ecolab has completed third-party verification by Anthesis Consulting (Ltd) (Anthesis) of its publicly reported 2014 Corporate Sustainability Report. Anthesis completed its Limited Assurance level review against the Accountability AA1000 Assurance Standard (2008)—Type 2 Assurance by testing the components of the Principles for Quality and Content (per GRI G4 Guidance) and coverage across the three principles defined in the AA1000 Assurance Standard (Inclusivity, Materiality, Responsiveness). The assurance practitioners selected for this engagement were qualified to perform the services and were impartial and independent from the management systems and reports being audited. Based on Anthesis activities nothing has come to its attention to indicate that the information and data in the 2014 CSR Summary and GRI Appendix reports are not materially correct, in accordance with the reporting criteria. This opinion is based on a limited level of assurance and at the materiality of the professional judgment of the verifier. The statement of verification is included at the end of the complete GRI Index.

Ecolab has completed third-party verification by Bureau Veritas North America (BNVA) of its publicly reported 2014 Global Scope 1, 2 and 3 (Business Travel only) Greenhouse Gas Emissions in accordance with the ISO 14064-3 Standard, and its publicly reported 2014 Global Water withdrawal in accordance with Bureau Veritas Assurance Procedures and International Standard on Assurance Engagements (ISAE) 3000 (basis for Bureau Veritas assurance procedures). The determination of the GHG emissions and Water withdrawal is the sole responsibility of Ecolab. BVNA was not involved in determining the GHG emissions and Water withdrawal. BVNA's sole responsibility was to provide independent verification on the accuracy of the GHG emissions and Water withdrawal reported, and on the underlying systems and processes used to collect, analyze and review the information.

GHG Reporting Protocols against which verification was conducted include the World Resources Institute (WRI)/World Business Council for Sustainable Development (WBCSD) Greenhouse Gas Protocol, Corporate Accounting and Reporting Standard and the WRI/WBCSD Corporate Value Chain (Scope 3) Accounting and Reporting Standard. The GHG Verification Protocol used to conduct the verification was ISO 14064-3: Greenhouse gases—Part 3: Specification with guidance for the validation and verification of greenhouse gas assertions.

Based on the verification process and procedures conducted to a limited assurance level of the GHG emissions assertion, BVNA found no evidence that the GHG emissions assertion and Water withdrawal assertion is not materially correct; is not a fair representation of the GHG emissions and Water withdrawal data and information; and is not prepared in accordance with the WRI/WBCSD GHG Protocol Corporate Accounting and Reporting Standard, International Standard on Assurance Engagements (ISAE) 3000 (basis for Bureau Veritas assurance procedures), and for Corporate Reporting on Carbon and Water on Behalf of Investors and Supply Chain Members. It is in BVNA's opinion that Ecolab has established appropriate systems for the collection, aggregation and analysis of quantitative data for determination of GHG emissions and Water withdrawal for the stated period and boundaries. Additional information is available in our CDP online submission, available at cdp.net.

GOVERNANCE STRUCTURE OF THE ORGANIZATION (G4-34)

For detailed corporate governance information, refer to Ecolab's 2014 Annual Report and Form 10-K.

While the full board of directors monitors the company's progress regarding sustainability, including climate change, the Safety, Health and Environment Committee has the highest level of direct responsibility for sustainability matters, including environmental and social impacts and those relating to climate change. The board of directors receives a presentation from this committee annually on the company's progress regarding its sustainability goals, which include climate-change impacts as appropriate. The committee members are appointed by the board and are comprised of no fewer than three directors. The primary responsibility for assuring the corporation's compliance with applicable safety, health and environmental (SHE) laws and regulations is vested in management of the corporation. In order to monitor such compliance, the board has established the committee. The committee is appointed by the board to review and oversee the corporation's SHE policies, programs and practices that affect, or could affect, the corporation's employees, customers, stockholders and neighboring communities.

Ecolab's sustainability strategy (which includes environmental, social and governance components) is governed by a Sustainability Executive Advisory Team (SEAT) that is made up of ten members of the company's executive leadership team. The SEAT meets with the Corporate Sustainability Team (comprised of research and development, communication, marketing and supply chain) on a quarterly basis and is responsible for operationalizing sustainable business practices and polices across the company; coordinating and communicating policy and decision making related to sustainability; setting goals and metrics for key sustainability priorities; and assessing sustainability outlook and risk management.

THE ORGANIZATION'S VALUES, PRINCIPLES, STANDARDS AND NORMS OF BEHAVIOR (G4-56)

Values

THE WORK WE DO MATTERS

- We make the world cleaner, safer and healthier.
- We protect vital resources, ensuring that water and energy are available everywhere.
- Our products and services prevent disease and infection. They keep food supplies safe, protecting the places where people eat, sleep, work, play and heal.
- We touch what is fundamental to quality of life: We keep people healthy. We enhance well-being. We provide assurance, so life can be lived fully.
- We help our customers succeed. We reduce risk and worry, freeing them to grow.

HOW WE WORK MATTERS, TOO

- We work with purpose. When there's a goal, we reach it. When there's a problem, we solve it.
- We work safely. We take care in all we do.
- We strive to do what's right, what's fair, and what's honest.
- We take action together, in teams made stronger by diverse perspectives.
- We find inspiration and energy in what we do and how we do it. In growing, learning and celebrating together. In making a difference and serving the greater good.

Principles

ECONOMIC: Drive economic growth for our customers, employees, shareholders and communities.

ENVIRONMENTAL: Promote stewardship of natural resources and protect the environment.

SAFETY: Ensure safe processes that protect our employees, contractors, customers and communities.

SOCIAL: Enhance the well-being of people and communities.

Code of Conduct

Ecolab adopted its initial Code of Conduct policy in 1976. The policy was last amended on November 29, 2012. The Code of Conduct applies to all Ecolab officers, directors and employees. Ecolab intends to promptly disclose on our website should there be any further amendments to, or waivers by the board of directors of, the Code of Conduct.

Ecolab employees and board members receive Code of Conduct training during their onboarding program and are required to complete an online refresher course and certify understanding and compliance with the Code of Conduct on an annual basis. The Code of Conduct is available in 20 languages.

The excellent reputation Ecolab enjoys is one of its greatest assets. It provides a solid foundation upon which to build trust with our customers and communities.

Our Code of Conduct serves as a guide for how to act and make decisions as an employee of Ecolab.

Each employee is responsible for demonstrating the company's values and following its Code of Conduct. How we work really does matter – to our coworkers, customers and communities.

Our Code of Conduct is available on Ecolab.com at http://investor.ecolab.com/corporate-governance-document.cfm?DocumentID=14079

G4 SPECIFIC STANDARD DISCLOSURES ECONOMIC

DISCLOSURE OF MANAGEMENT APPROACH

Refer to Ecolab's 2014 Annual Report and Form 10-K.

FINANCIAL ASSISTANCE RECEIVED FROM GOVERNMENT (G4-EC4)

In 2014, Ecolab received nominal monetary support, awards, tax reliefs or subsidies directly from the government.

We received federal and state tax credits in the United States to support our research and development initiatives totaling \$14,503,637 (R&D credits received in 2014 related to 2013 tax returns).

The Dutch government invested in our paper and water businesses in 2014 totaling €102,113 toward R&D innovation.

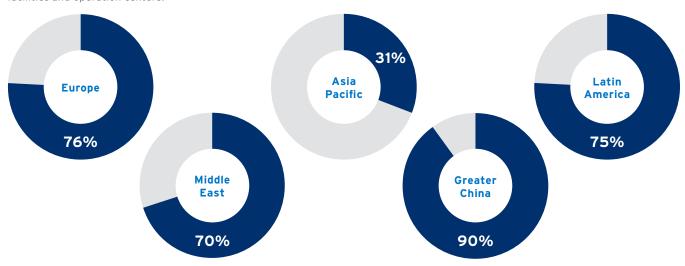
Anticipated tax deductions by the Australian government for R&D expenditures in Australia will total approximately \$1,700,000 AUD for 2014.

RATIO OF STANDARD ENTRY-LEVEL WAGE BY GENDER COMPARED TO LOCAL MINIMUM WAGE AT SIGNIFICANT LOCATIONS OF OPERATIONS (G4-EC5)

We have salaried and hourly wage workers in 171 countries. We comply with fair-wage laws within the regions in which we operate. Further delineation of wages is not disclosed because the information is proprietary.

PROPORTION OF SENIOR MANAGEMENT HIRED FROM THE LOCAL COMMUNITY AT SIGNIFICANT LOCATIONS OF OPERATION (G4-EC6)

Senior management is defined as N-2 levels in the regions in which we operate (positions reporting the region leader). Local is defined as the major regions in which we operate outside of the United States: Europe, Latin America, Greater China, Asia Pacific and Middle East/Africa. Significant locations of operations are defined as our manufacturing facilities and operation centers.



DEVELOPMENT AND IMPACT OF INFRASTRUCTURE INVESTMENTS AND SERVICES SUPPORTED (G4-EC7)

We did not invest in significant infrastructure or services with direct impacts on local communities in 2014.

SIGNIFICANT INDIRECT ECONOMIC IMPACTS, INCLUDING THE EXTENT OF IMPACTS (G4-EC8)

Ecolab solutions improve the productivity of organizations and reduce environmental impacts on communities around the world where people live and work. Every day, we help make the world cleaner, safer and healthier. Our products and services help companies across dozens of industries operate more efficiently, delivering better results at lower total costs of operations. With solutions that enable customers to produce more products and services using fewer natural resources, Ecolab helps customers meet business goals, conserving limited water and energy resources and minimizing waste and emissions.

Specific examples of the impact we have on the operational productivity and sustainability of companies throughout the value chain – from raw material and ingredient processing to production and manufacturing to services delivery – are highlighted in our 2014 Corporate Sustainability Report Summary on pages 12-27 (the report is available at <u>Ecolab.com/sustainability</u>).

PROPORTION OF SPENDING ON LOCAL SUPPLIERS AT SIGNIFICANT LOCATIONS OF OPERATION (G4-EC9)

We do not have a specific proportion of budget spend on local suppliers within each region, but 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 our company (posted on ecolab.com). We base our purchasing decisions on safety, quality, service and price, opting to purchase within the region whenever possible to minimize shipping of materials overseas. More than 90 percent of our purchases are from suppliers within our regions.

"Local" is defined with regard to the major regions in which we operate: North America, Europe, Latin America, Asia Pacific, Greater China and Middle East/Africa. Significant locations of operations are defined as our manufacturing facilities and operation centers.

Ecolab 2014 Corporate Sustainability Report

G4 SPECIFIC STANDARD DISCLOSURES ENVIRONMENTAL

Sustainability is core to our purpose at Ecolab. Stewardship of natural resources is an integral part of our operational and business strategy, from the way we run our plants and facilities to the products we develop and the way we serve our customers.

We have a history of strong environmental performance and have made significant strides in recent years to reduce our environmental impact.

Committed to Continuous Improvement

Our environmental performance achievements are the result of enterprise and facility-level commitments to increasing the efficiency of our operations through actions and investments that result in greater environmental stewardship.

Through our Create and Maintain Value program, we employ our expertise and technology to continually find more ways to deliver strong business results while saving water, energy and wastewater and prolonging equipment life throughout our facilities. We do this with an eye for how our impact extends beyond our operations to local people and communities. In 2014, we completed 77 process improvement projects that delivered resource reduction outcomes across our global footprint. For example:

- Our Clearing, Ill., plant made improvements on its cooling towers, replaced steam traps, and made steam leak repairs that resulted in 63,000 therms of natural gas savings and over 17 million gallons of water savings. (\$128,000 cost savings)
- Our Joliet, III., plant upgraded its boiler economizer and added insulation to its heating pipes which resulted in 155,000 therms of natural gas savings. (\$222,000 cost savings)
- Our Celra, Spain, plant implemented various steam generation improvements throughout the plant that allowed for 8,000 therms in natural gas savings and almost 800,000 gallons of water savings. (\$56,000 cost savings)
- Our Burlington, Ontario, Canada, plant updated their steam condensate piping in an effort to reduce overflows in the steam boiler that resulted in 26,000 therms of natural gas savings and over 790,000 gallons of water savings. (\$25,000 cost savings)
- Our Nieuwegein, Netherlands, plant removed all excess steam piping which resulted in 6,000 therms of natural gas savings. (\$12,400 cost savings)
- Our La Romana, Dominican Republic, plant completed a lighting retrofit for the entire plant, and replaced a compressor with a more energy efficient one, which resulted in 1.3 million kWh of electricity savings. (\$240,000 cost savings)

DISCLOSURE OF MANAGEMENT APPROACH (G4-EN DMA)

The following Disclosure of Management Approach covers environmental aspects material to Ecolab as disclosed in this report.

Commitments

Our sustainability leadership is rooted in our enterprise-wide commitment to operational efficiency and environmental stewardship. We operate with respect for the environment and promote stewardship of natural resources from the way we run our plants and facilities to the products we develop and the way we serve our customers.

We have a history of strong environmental performance and have made significant strides in recent years to reduce our environmental impact. As our company grows, entering new industries and geographies, minimizing the impact of our own operations is increasingly important.

Goals, Targets and Evaluation

In 2014, we reaffirmed and strengthened our commitment to environmental stewardship. We are holding our company to a higher standard with aggressive new global sustainability targets to reduce the company's environmental impact over four years. Using the company's 2012 metrics as an operational baseline, we announced new goals including a 25 percent reduction in effluent discharge and waste, a 20 percent reduction in water use and a 10 percent reduction in greenhouse gas (GHG) emissions, measured by intensity per million dollars in sales.

We made incremental progress towards our global sustainability targets in 2014. Our strengthened focus on continued integration of systems and processes across our global footprint resulted in actionable strategies to achieve the new goals. With a global team deployed to improve operational efficiency and performance, we expect to make significant strides toward our sustainability goals in 2015.

We are proud of the improvements we have made in the past year and are excited to embark on an intentional path that will further our leadership as a responsible global enterprise.

Policies

Refer to Ecolab's Global Safety Health & Environmental Position: <u>ecolab.com/sustainability/commitment-to-sustainability/people/committed-to-safety-and-health.</u>

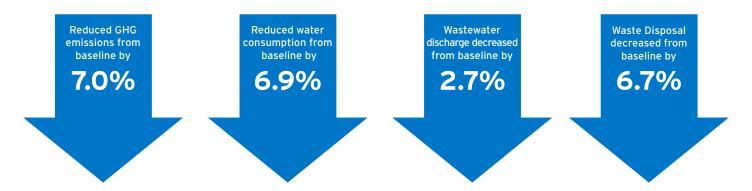
Our Water Stewardship position formalizes our global commitment to undertake responsible water stewardship by identifying opportunities for our company and our customers to use water resources in a manner that benefits business, communities and nature: http://www.ecolab.com/~/media/Ecolab/Ecolab%20Home/Documents/DocumentLibrary/PositionStatements/ WaterStewardshipPosition.ashx.

Responsibilities

Ecolab's sustainability strategy is governed by a Sustainability Executive Advisory Team (SEAT) made up of 10 members of the company's executive leadership. SEAT meets with the Corporate Sustainability Team on a quarterly basis and is responsible for operationalizing sustainability across the company; coordinating and communicating company policy and decision-making related to sustainability; setting annual goals and metrics for key sustainability priorities; sustainability outlook assessment; and risk management.

2014 ENVIRONMENTAL PERFORMANCE (CHANGE FROM 2012 BASELINE)

(Measured by intensity per million dollars in sales)



MATERIALS USED BY WEIGHT OR VOLUME (G4-EN1)

	Units	2013	2014
Raw Material Used (nonrenewable)	Metric Tons (MT)	1,978,122	2,456,463

The scope of raw material data is limited to global supply-chain manufacturing facilities. We are unable to provide a consistent scope of data prior to 2013.

PERCENTAGE OF MATERIALS USED THAT ARE RECYCLED INPUT MATERIALS (G4-EN2)

	Units	2012	2013	2014
Total Recycled Input Materials Used in Packaging	MT	973	1,395	1,262
Total Packaging Used	МТ	5,330	10,890	7,211
Percentage of Recycled Material Used in Packaging		18.3%	12.8%	17.5%

The scope of recycled packaging data is limited to global Legacy Nalco.

PERCENTAGE OF MATERIALS USED THAT ARE RECYCLED INPUT MATERIALS (G4-EN2) (CONTINUED)

VIRGIN DRUM RESIN AVOIDED

	Units	2014
Reconditioned Drums Purchased	МТ	1,620
Drums Returned for Reuse	МТ	2,958

Ecolab purchases reconditioned drums to avoid the use of virgin plastic. Ecolab has a drum return program that allows for the avoidance of virgin plastic use. The scope of reconditioned drum and drums returned data is global Legacy Ecolab. We are unable to provide a consistent scope of data prior to 2014.

Data collected is provided by Ecolab's procurement department.

ENERGY CONSUMPTION WITHIN THE ORGANIZATION (G4-EN3)

DIRECT ENERGY CONSUMED BY SOURCE

	Units	2012	2013	2014
Natural Gas	GJ	2,756,006	2,923,524	3,155,387
Gasoline	GJ	1,752,337	1,934,365	2,105,838
Diesel	GJ	774,306	938,467	802,102
Ethanol	GJ	93,127	127,785	138,197
Distillate Fuel Oil (#1, 2, 4)	GJ	121,705	118,960	101,000
LPG	GJ	50,482	49,546	46,178
Residual Fuel Oil (#5 & 6)	GJ	4,840	3,440	3,194
LNG	GJ	-	-	1,183
Biodiesel	GJ	29	61	284
CNG	GJ	397	293	57
Methanol	GJ	-	-	20

ENERGY CONSUMPTION WITHIN THE ORGANIZATION (G4-EN3) (CONTINUED)

INDIRECT ENERGY CONSUMED BY SOURCE

	Units	2012	2013	2014
Electricity	GJ	1,502,134	1,491,867	1,571,036
Steam	GJ	155,386	157,944	168,151
Heating Consumption	GJ	38,469	50,991	55,177
Cooling Consumption	GJ	2,374	2,684	2,602

ELECTRICITY SOLD

	Units	2012	2013	2014
Electricity Sold	GJ	1,233	2,504	2,755

Our Legacy Nalco headquarters/RD&E facility in Naperville, III., has as onsite tri-generation facility that produces the majority of electricity used by the facility, and all of the chilled water and steam used for cooling and heating the building. Any unused electricity is sold back to the grid.

ENERGY USE BY REGION

	Units	2012	2013	2014
Asia Pacific	GJ	410,078	482,852	476,496
EMEA	GJ	973,837	1,063,750	1,058,519
Latin America	GJ	204,920	235,159	253,922
North America	GJ	5,660,384	6,018,164	6,361,471
Global	GJ	7,249,219	7,799,925	8,150,408

ELECTRICITY USE BY REGION

	Units	2012	2013	2014
Asia Pacific	GJ	190,402	202,218	200,501
EMEA	GJ	267,251	269,500	274,292
Latin America	GJ	68,750	64,637	76,638
North America	GJ	975,730	955,512	1,019,605
Global	GJ	1,502,133	1,491,867	1,571,036

United States Environmental Protection Agency Climate Leaders conversion factors were used.

ENERGY CONSUMPTION OUTSIDE THE ORGANIZATION (G4-EN4)

DIRECT ENERGY CONSUMED BY SOURCE (2014)

SOURCES OF SCOPE 3 EMISSIONS	METRIC TONNES CO ₂ e	METHODOLOGY
Fuel-and- Energy- Related Activities (not included in Scope 1 or 2)	126,231	Upstream emissions from purchased fuels, electricity, steam and hot and chilled water, include generation and T&D emissions, and any other losses in this category. Data quality is considered to be consistent with inputs from our global database on sustainability metrics. Upstream emissions of purchased electricity are calculated for the US and other countries by multiplying electricity activity data by country or region-specific emission factors from UK Defra 2014 Guidelines for GHG Reporting. Upstream emissions from purchased fuels, steam, and hot and chilled water are calculated using emissions factors from UK Defra 2014 Guidelines for GHG Reporting. Emissions associated with losses were calculated for the US and other countries by multiplying the energy use by type by emission factors from UK Defra 2014 Guidelines for GHG Reporting. All GWPs are from the IPCC Second Assessment Report in line with the Kyoto Protocol.
Waste Generated in Operations	35,239	This waste figure represents global waste emissions from waste disposed via landfilling and incineration, but does not include waste recycled or composted. Data quality is considered to be consistent with inputs from our global database on sustainability metrics. Data on waste quantity are obtained and reported from US and International sites. Emissions from waste are calculated using methodologies and emission factors from the EPA's Waste Reduction Model (WARM), version 13, March 2015. Landfill emissions factors are used directly from WARM. This model bases its emissions calculations on a life-cycle analysis, including emissions from the long-term decomposition of waste in a landfill and upstream sources/sinks. GWPs are from the IPCC (2007) Fourth Assessment Report. For incineration, the WARM method has been adjusted to align with the GHG Protocol's Corporate Value Chain (Scope 3) Standard, based on emissions for transport to the incinerator and processing of materials prior to incineration.
Business Travel	53,360	Scope 3 Business Travel includes U.S. air travel, personal vehicle use for business travel and rental vehicles. Air-travel emissions are calculated using Defra shorthaul, medium-haul and long-haul emissions factors. Personal vehicle use for business travel and rental-vehicle emissions are established using activity data on distance traveled and an estimated vehicle fuel economy. GWPs are from the IPCC Second Assessment Report.
Purchased Goods and Services	10,116,702	Ecolab has used Environmentally Extended Economic Input Output (EEIO) analysis for a portion of its annual supplier & procurement spend data. This is categorization model to convert \$USD spend based on relevant NAICS sector categories into carbon emissions associated with the extraction, production and transport of purchased goods and services acquired or purchased by Ecolab in the reported year. For our first year of data collection, analysis and reporting, we have evaluated 100% of the spend in our three most material supplier categories: Raw Material Chemical suppliers, Packaging suppliers and Equipment suppliers. For each, we have incorporated 100% of the global spend data for 2014 (and 2013 to enable year on year comparison). In total, this represents more than 50% of our total global supplier spend and corresponding Purchased Goods and Services related emissions.
Total	10,331,532	

ENERGY INTENSITY (G4-EN5)

	Units	2012	2013	2014
Energy Intensity (within the organization)	GJ/\$M	574	574	567

All energy use within the organization is included.

	Units	2012	2013	2014
Ratio Denominator - Global Sales	\$M (adjusted)	12,622	13,598	14,366

Fixed currency USD. Sales figures represented are globally adjusted for inflation using the Producer Price Index. This ratio denominator was used for all intensities shown for GRI-EN indicators and is used for our corporate operational goal reporting.

	Units	2012	2013	2014
Electricity Use Intensity (within the organization)	GJ/\$M	119	110	109

REDUCTION OF ENERGY CONSUMPTION (G4-EN6)

	Units	2014
Asia Pacific	kWh	581,770
EMEA	ƙWh	890,112
Latin America	kWh	91,059
North America	kWh	10,517,045
Global	kWh	12,079,986

The scope of reduction of energy consumption data is limited to global supply chain manufacturing facilities. We are unable to provide consistent scope of data prior to 2014. Energy savings represent a combination of direct measurements and estimations using best-practices methodologies.

REDUCTION IN ENERGY REQUIREMENTS OF PRODUCTS AND SERVICES (G4-EN7)

Many of Ecolab's innovative products and services help customers reduce energy use. Four examples of our impact in 2014 include:

PARETO Mixing Technology: In 2014, we helped customers save an estimated 1.1 trillion BTUs globally through the use of our PARETO Mixing Technology, which enhances chemical performance by optimizing the injection of chemical additives into industrial-process streams. By allowing reuse of warmer process water in papermaking, papermakers avoid the need to heat water from freshwater temperature to process.

The methodology used to estimate these avoided emissions is based on the quarterly calculated energy savings delivered by the technology based on historical and forecasted marketing and sales data. The benchmark for comparison is the historic performance of the technology that was replaced in the year the product was launched.

HVAC Performance Services (energy and air [CO₂e]): In 2014, we helped customers in the United States save an estimated 126 million kWh and avoid 191 million lbs. of CO₂e through our HVAC Performance Services. The goal of this program is to maintain HVAC systems at peak performance. Dirty coils and inefficient filters can reduce cooling capacity, causing cooling-comfort or production-climate-control problems while wasting energy and increasing the waste stream of filter disposal. Ecolab achieves these emissions reductions by cleaning cooling and heating coils using an innovative process that recovers the heat-transfer capabilities of the coils. On average, the cooling capacity of the system is improved by 50 percent (based on internal national energy data). This coil-cleaning service is backed up by energy audits that document cooling capacity improvements, including energy savings and carbon-footprint reduction due to improved heat transfer and increased airflow/lower pressure drop across the cooling/heating coils.

The methodology used to estimate these avoided emissions is based on the quarterly calculated energy savings delivered by the technology based on historical and forecasted marketing and sales data. The benchmark for comparison is the historic performance of the technology that was replaced in the year the product was launched.

APEX: In 2014, we helped customers in the United States save an estimated 138 million kWh and avoid 215 million lb. of CO_2 e through the use of our APEX warewashing program. By using the APEX program, restaurant owners are able to minimize rewash while maintaining cleaning performance and operating at a lower wash temperature.

The methodology used to estimate these avoided emissions is based on annual sales data for APEX and the assumption that a full-service casual dining restaurant open 364 days per year runs 127,400 racks per year. With the implementation of the APEX system, restaurants see a 10 percent rack reduction of washes. The benchmark for comparison is assumed historic performance of traditional technology.

AQUANOMIC: In 2014, we helped customers in the United States save an estimated 402 billion BTUs and avoid 47 million lbs. of CO_2 e through the use of our Aquanomic laundry program. By using the Aquanomic program, lodging owners are able to reduce the number of rinse cycles while maintaining cleaning performance and operating at a lower wash temperature.

The methodology used to estimate these avoided emissions is based on annual sales data for Aquanomic, water savings documented from field trials and third-party studies and the assumption that a load consists of 100 lbs. of linen. The benchmark for comparison is assumed historic performance of traditional technology.

Customer Impact

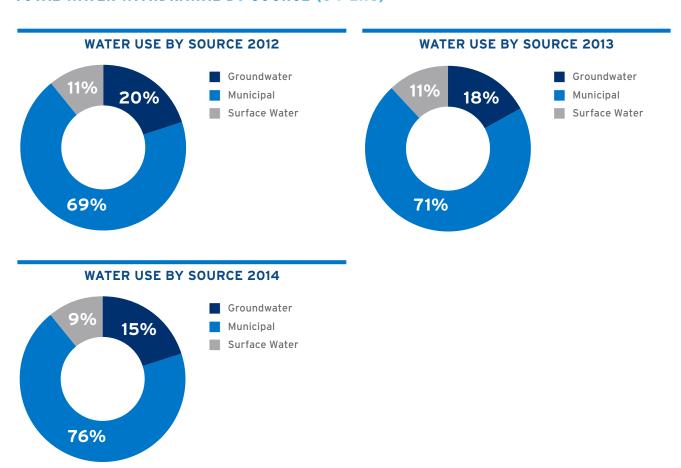
Our solutions help customers achieve ambitious business and environmental goals. With an unparalleled combination of science and service, we deliver exponential outcomes that benefit customers and communities. Fundamental to our approach is an understanding that real and lasting change is accelerated when economic and environmental benefits align. We call this our eROI outcome:

The exponential value of improved performance, operational efficiency and sustainable impact.

Measurement is a critical component of our process to deliver exponential outcomes. Using our proprietary eROI value approach, we measure our impact and quantify customers' return on investment.

Key performance indicators for this include the number of eROI customer case studies (total, by divisions, new and expanded technologies) and the number of market impact studies related to our clean water and abundant energy (or efficiency) platforms. Our targets for case studies and market impact studies were 68 and 10, respectively. In 2014, we achieved 128 case studies (188 percent of annual target) and nine market impact (90 percent of target).

TOTAL WATER WITHDRAWAL BY SOURCE (G4-EN8)



TOTAL WATER WITHDRAWAL BY SOURCE (G4-EN8) (CONTINUED)

WATER WITHDRAWAL BY SOURCE

	Units	2012	2013	2014
Municipal Water or Other Water Utility	Cubic m	5,174,573	5,431,477	5,849,036
Groundwater	Cubic m	1,546,573	1,344,626	1,169,775
Surface Water	Cubic m	830,464	876,444	701,014
Rain Water	Cubic m	-	-	806

WATER WITHDRAWAL BY REGION

	Units	2012	2013	2014
Asia Pacific	Cubic m	840,123	656,152	785,424
EMEA	Cubic m	1,377,234	1,449,779	1,302,738
Latin America	Cubic m	290,246	296,372	386,673
North America	Cubic m	5,044,367	5,240,244	5,245,797
Global	Cubic m	7,551,970	7,642,547	7,720,632
	Units	2012	2013	2014
Water Use Intensity (within the organization)	Cubic m/\$M	598	562	537

The scope of water withdrawal by source data consists of global supply-chain manufacturing facilities and headquarters/RD&E facilities.

WATER SOURCES SIGNIFICANTLY AFFECTED BY WITHDRAWAL OF WATER (G4-EN9)

Overview

Ecolab undertakes an annual water-risk assessment to identify facilities that may operate within water stressed regions, both in the near and long term. The analysis is based upon combining our supply chain water consumption footprint and production metrics with water risk inputs provided by the WRI Aqueduct tool. Ecolab augments watershed risk and stress input from this tool with valuations from the Water Risk Monetizer Tool as a means to inform decisions at an operational level. In 2014, Ecolab created and launched the Water Risk Monetizer Tool, and has incorporated the risk premium and financial cost of water results from this tool into its overall analysis for determining whether any facilities in operation are exposed to water risks, either current and/or future, that could generate a substantive change in business, operations, revenue or expenditure.

Methodology Detail

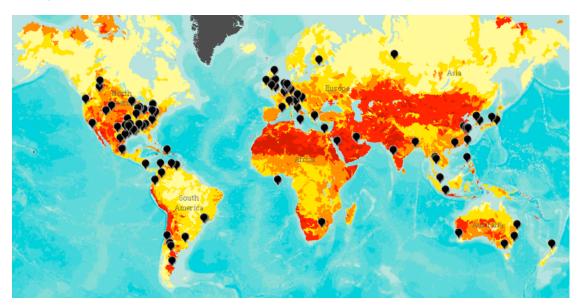
In 2014, we evaluated 118 manufacturing and campus/tech center facilities, representing 86 percent of our total global water-withdrawal footprint. This list of facilities was refined by using four primary criteria: an overall water-risk factor greater than 2.0 (e.g., medium to high risk and above) provided by the WRI Aqueduct Tool, a facility-to-total water use intensity ratio of greater than 0.20 percent, a water withdrawal per ton of production intensity ratio of greater than 2.30, and a 10 year water price escalation percentage of greater than 100 percent. Medium-to-High Overall Water Risk and above was selected as a preliminary filter to identify those sites operating in river basins subject to current and/or future water stress (inclusive of physical, quality, quantity, regulatory and reputational risks). We established the two internal indicators by quantifying the total waterwithdrawal intensity for each site and established a threshold coverage of greater than 95 percent for our facilities; as a result, any sites that have a withdrawal factor of less than 0.20 percent would be excluded based on their materiality to business operations. Similarly, we calculated an enterprise wide water-withdrawal-to-production-intensity factor and set the threshold for sites to include in our analysis at those sites that are greater than the average of 2.30. Finally, we are now including the insight available through the Water Risk Monetizer tool which quantifies the impact of water scarcity on a facility in monetary terms resulting in a 10 year projected risk premium to the current price a facility pays for its water today. The water risk premium, when added to the local price a business pays for water, quantifies the value a business should place on water based on real and future risk related to water scarcity. Using this tool, we identified facilities that have a projected risk premium greater than 100 percent of current water costs within 10 years.

Results

Based on this methodology, eight facilities representing 10.8 percent of our total water consumption and 7.3 percent of our total production operate in river basins with current and/or future defined water stress and could be affected by Ecolab's withdrawal of water.

WATER SOURCES SIGNIFICANTLY AFFECTED BY WITHDRAWAL OF WATER (G4-EN9) (CONTINUED)

Global view of Ecolab facilities with an overall water-risk filter applied using chemicals sector weighting (WRI Aqueduct tool)



Source: wri.org/our-work/project/aqueduct/aqueduct-atlas

For more information about Ecolab's approach to water management, identification of facilities where water risk does exist and how Ecolab is managing its own risks and opportunities as they relate to water, please refer to our CDP Water submission, available at cdp.net.

PERCENTAGE AND TOTAL VOLUME OF WATER RECYCLED AND REUSED (G4-EN10)

	Units	2014
Total Water Recycled & Reused	Cubic m	158,711
Total Water Recycled & Reused as a Percent of Total Water Withdrawl	-	2.17%

The scope of water recycled and reused data includes global supply chain manufacturing sites. We are unable to provide consistent scope of data prior to 2014.

OPERATIONAL SITES OWNED, LEASED, MANAGED IN OR ADJACENT TO PROTECTED AREAS AND AREAS OF HIGH BIODIVERSITY VALUE OUTSIDE PROTECTED AREAS (G4-EN11)

Ecolab owns one manufacturing facility in Garyville, Louisiana, that has protected wetlands on its property. The protected area on the premises comprises 220 acres or 0.89km². It is not developed and contains no buildings. This is the only known operational site that has owned or leased land that is in or adjacent to protected areas and areas of high biodiversity value outside of protected areas.

DESCRIPTION OF SIGNIFICANT IMPACTS OF ACTIVITIES, PRODUCTS AND SERVICES ON BIODIVERSITY IN PROTECTED AREAS AND AREAS OF HIGH BIODIVERSITY VALUE OUTSIDE PROTECTED AREAS (G4-EN12)

Ecolab direct operations, activities, products and/or services do not have a significant impact on biodiversity in protected areas or areas of high biodiversity value outside of protected areas.

HABITATS PROTECTED OR RESTORED (G4-EN13)

In 2014, Ecolab expanded our commitment to global water stewardship by working with the World Wildlife Fund (WWF)-US as a founding partner of the Alliance for Water Stewardship (AWS) to support the launch and implementation of the International Water Stewardship Standard, a global framework to promote sustainable freshwater use. Our 2014 sponsorship of \$300,000 advanced a three-year water stewardship partnership to promote implementation of the AWS Standard and implement solutions to protect Taihu Lake, the third-largest freshwater lake in China and the primary water source for more than 33 million people around Shanghai.

In 2014, Ecolab committed \$2 million through the Ecolab Foundation to The Nature Conservancy, a leading conservation organization working to protect the lands and waters on which all life depends. The partnership supports The Nature Conservancy's Securing and Restoring Water Sources Around the Globe initiative. The support is part of Ecolab's newly launched Solutions for Life program, which enhances the company's work to conserve water and improve hygiene around the world through new partnerships, global philanthropy and employee volunteerism. This three-year commitment to The Nature Conservancy expands upon Ecolab's 25 years of support for the organization's work in Minnesota and, for the first time, focuses on water conservation globally, with initial projects in China and Mexico. The grant supports:

- land and water conservation activities in Minnesota;
- strategies to protect water resources in Shanghai, where more than 24 million people depend largely on the Yangtze River for their water needs; and
- expanded efforts in the metropolitan area of Monterrey, Mexico, to reforest and implement other conservation methods to help slow the flow of water upstream from the city and provide clean water for Monterrey.

TOTAL NUMBER OF IUCN RED-LIST SPECIES AND NATIONAL CONSERVATION LIST SPECIES WITH HABITATS IN AREAS AFFECTED BY OPERATIONS (G4-EN14)

We are not aware of any operations that affect IUCN red-list species or national conservation list species.

DIRECT GREENHOUSE GAS (GHG) EMISSIONS (SCOPE 1) (G4-EN15)

	Units	2012	2013	2014
Gross Direct (Scope 1) GHG Emissions	MT CO ₂ e	398,038	405,348	419,754

Scope 1 emissions reported are independent of any GHG trades, such as purchases, sales or transfers of offsets or allowances. The inventory includes CO_2 , CH_4 and N_2O emissions from fuel consumption and HFC emissions from refrigerant use.

Note: PFCs, NF₃ and SF₆ are not included since Ecolab does not use these compounds.

Emissions factors used for electricity and other fuels are subregion-, country- or region-specific where applicable using the latest databases from governmental sources (i.e., EPA's eGRID, UK's Defra and the International Energy Association).

	Units	2012	2013	2014
Biogenic Emissions	MT CO ₂ e	9,992	21,185	24,921

Biogenic emissions include biodiesel and Ethanol (E85) fuel use. Chosen base year for GHG emissions is 2012. United States Environmental Protection Agency's Climate Leaders Emissions factors were used to calculate direct emissions. Chosen consolidation approach for emissions is operational control.

INDIRECT GREENHOUSE GHG EMISSIONS (SCOPE 2) (G4-EN16)

	Units	2012	2013	2014
Gross Indirect (Scope 2) GHG Emissions	MT CO ₂ e	238,327	241,161	253,964

Scope 2 emissions reported are independent of any GHG trades, such as purchases, sales or transfers of offsets or allowances. The inventory includes CO_2 , CH_4 and N_2O emissions from electricity, heating and cooling consumption.

Chosen base year for GHG emissions is 2012. Emissions factors used for electricity and other fuels are subregion-, country- or region-specific where applicable using the latest databases from governmental sources (i.e., United States Environmental Protection Agency's eGRID, United Kingdom's Defra and the International Energy Association). Chosen consolidation approach for emissions is operational control.

OTHER INDIRECT GHG EMISSIONS (SCOPE 3) (G4-EN17)

	Units	2012	2013	2014
Gross Indirect Business Travel (Scope 3) GHG Emissions	MT CO ₂ e	60,321	60,244	53,360
Purchased Goods and Services	MT CO ₂ e	-	10,024,541	10,116,702
Fuel and Energy related activities	MT CO ₂ e	-	121,365	126,231
Waste Generated in Operations	MT CO ₂ e	-	44,181	35,239

The scope of business-travel emissions is travel by United States-based and European-based employees only. Data availability for European business travel varies by country. It is estimated that 70 percent of all business travel emissions are represented. Defra 2014 emissions factors were used to calculate Scope 3 business-travel GHG emissions.

The scope of Purchased Goods and Services emissions is Ecolab's global supplier spend based on our 3 most material supplier categories, representing 100 percent of our global spend per category Raw Material Chemical suppliers, Packaging suppliers and Equipment suppliers.

The scope of Fuel and Energy related activities includes 100 percent of Ecolab's Scope 1 and 2 consumed fuels and energy.

The scope of Waste Generated in Operations includes global owned and leased facilities.

GHG EMISSIONS INTENSITY (G4-EN18)

	Units	2012	2013	2014
Direct and Indirect GHG Emissions Intensity	MT CO ₂ e/\$M	50.4	47.5	46.9

Gases included: natural gas, LPG, residual fuel oil, distillate fuel oil, gasoline, CNG, diesel, biodiesel and E85. Scope 1, 2 and 3 are included.

	Units	2012	2013	2014
Direct GHG Emissions Intensity	MT CO ₂ e/\$M	31.5	29.8	29.2
Indirect GHG Emissions Intensity	MT CO ₂ e/\$M	18.9	17.7	17.7

REDUCTION OF GHG EMISSIONS (G4-EN19)

	Units	2014
Asia Pacific	MTCO ₂ e	377
EMEA	MTCO ₂ e	266
Latin America	MTCO ₂ e	22
North America	MTCO ₂ e	1,987
Global	MTCO ₂ e	2,652

The scope of reduction of energy consumption data includes global supply chain manufacturing facilities. We are unable to provide consistent scope of data prior to 2014. The inventory includes CO_2 , CH_4 and N_2O emissions from fuel consumption and HFC emissions from refrigerant use. Note: PFCs, NF_3 and SF_6 are not included, since Ecolab does not use these compounds.

Example: Scope 3 Downstream Transportation and Distribution emissions reduction activity.

In 2014, Ecolab altered our partnership with Schneider, our largest contracted third party carrier, to switch as much of our product transportation from truck to rail (when possible) in order to reduce our carbon impact. Rail transportation reduces our GHG footprint by 50 percent per shipment and reduces shipping costs by approximately 10 percent (compared to truck transport). Through this program, Ecolab reduced ${\rm CO_2}$ emissions by 1,100 tons January - October.

EMISSIONS OF OZONE-DEPLETING SUBSTANCES (ODS) (G4-EN20)

	Units	2012	2013	2014
Asia Pacific	MT CFC-11 Equivalents	0.019	0.005	.025
EMEA	MT CFC-11 Equivalents	-	0.024	-
Latin America	MT CFC-11 Equivalents	0.003	0.003	.005
North America	MT CFC-11 Equivalents	0.622	0.231	.250
Global	MT CFC-11 Equivalents	0.644	0.263	0.280

No ODS are used in the production of Ecolab products. The ODS reported are used in chiller and HVAC systems in Ecolab manufacturing facilities. The scope of this metric includes all supply-chain manufacturing facilities. Sites that closed during 2013 are not included in the scope of 2013 data. Substances included in this calculation are R22, R123 and R124A. Emissions factors from the Montreal Protocol were used.

NOx, SOx AND OTHER SIGNIFICANT AIR EMISSIONS (G4-EN21)

NOX EMISSIONS BY REGION

	Units	2012	2013	2014
Asia Pacific	MT	204	255	252
EMEA	MT	251	241	237
Latin America	МТ	102	97	124
North America	МТ	719	701	721
Global	МТ	1,276	1,294	1,334

SOX EMISSIONS BY REGION

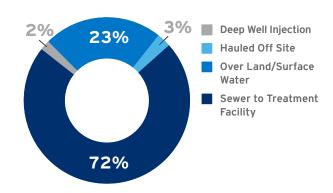
	Units	2012	2013	2014
Asia Pacific	MT	329	356	380
EMEA	МТ	178	182	172
Latin America	МТ	111	97	101
North America	МТ	502	453	468
Total	МТ	1,120	1,088	1,121
	11-96-	2012	2012	2014
	Units	2012	2013	2014
NOx Emissions Intensity	MT/\$M	0.101	0.0952	0.0929
SOx Emissions Intensity	MT/\$M	0.0887	0.0800	0.0780

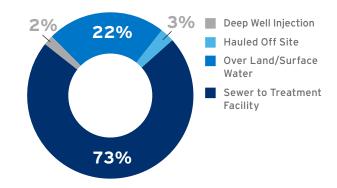
The scope of NOx and SOx reporting includes global facility fuel use, global facility electricity use and global fleet fuel use.

TOTAL WATER DISCHARGE BY QUALITY AND DESTINATION (G4-EN22)

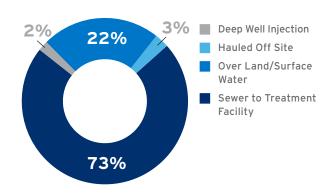
WATER DISCHARGE BY DESTINATION IN 2012

WATER DISCHARGE BY DESTINATION IN 2013





WATER DISCHARGE BY DESTINATION IN 2014



WATER DISCHARGE BY DESTINATION

	Units	2012	2013	2014
Deep Well Injection	Cubic m	78,206	81,646	112,639
Hauled Off-site	Cubic m	156,777	145,995	179,529
Over Land/Surface Water	Cubic m	1,128,824	1,027,576	1,117,450
Sewer to Treatment Facility	Cubic m	3,487,366	3,476,840	3,752,332
Solidification	Cubic m	-	-	208

TOTAL WATER DISCHARGE BY QUALITY AND DESTINATION (G4-EN22) (CONTINUED)

WATER DISCHARGE BY REGION

	Units	2012	2013	2014
Asia Pacific	Cubic m	341,121	347,600	367,334
EMEA	Cubic m	879,323	902,823	861,350
Latin America	Cubic m	200,048	198,520	178,722
North America	Cubic m	3,430,681	3,283,114	3,754,752
Total	Cubic m	4,851,173	4,732,057	5,162,158
	Units	2012	2013	2014
Water Discharge Intensity	Cubic m/\$M	384	348	359

The scope of water discharge is global supply-chain manufacturing facilities and headquarters/ RD&E facilities.

WATER DISCHARGE BY QUALITY

	Units	2014
Biological Oxygen Demand (BOD)	МТ	2,395
Total Suspended Solids (TSS)	MT	1,474

The scope of water quality data is global supply chain manufacturing facilities. Ecolab started reporting BOD and TSS in 2014 and is in the process of rolling out this reporting requirement across its supply chain. We are unable to provide consistent scope of data prior to 2014. 95 percent of global supply chain manufacturing water discharge is represented in the reported BOD volume. 87 percent of global supply chain manufacturing water discharge is represented in the reported TSS volume.

TOTAL WEIGHT OF WASTE BY TYPE AND DISPOSAL METHOD (G4-EN23)

	Units	2012	2013	2014
Nonhazardous Waste	MT	35,951	57,175	31,467
Hazardous Waste	МТ	33,174	35,079	42,108
Nonhazardous Solid Waste Intensity	MT/\$M	2.85	4.20	2.19
Hazardous Waste Intensity	MT/\$M	2.63	2.58	2.93

All waste is disposed of directly by the organization or otherwise directly confirmed by the waste disposal contractor. The primary type of hazardous waste that Ecolab produces is process waste from vessel washouts, equipment cleaning and other related waste. Generally this waste is corrosive or flammable, which is why it is deemed hazardous.

The scope of hazardous and nonhazardous solid waste is globally owned and leased facilities.

The nonhazardous solid waste increase in 2013 was due to one-time integration activities at three manufacturing facilities in the United States. If excluded, overall waste intensity decreased by 15 percent from the baseline year.

NONHAZARDOUS SOLID WASTE BY REGION

	Units	2014
Asia Pacific	MT	809
EMEA	MT	3,451
Latin America	MT	693
North America	МТ	24,184
Global	МТ	29,137

HAZARDOUS WASTE BY REGION

	Units	2014
Asia Pacific	MT	2,826
EMEA	MT	12,556
Latin America	MT	3,077
North America	MT	13,239
Global	MT	31,698

TOTAL WEIGHT OF WASTE BY TYPE AND DISPOSAL METHOD (G4-EN23) (CONTINUED)

NONHAZARDOUS SOLID WASTE BY DESTINATION

	Units	2014
Landfill	MT	18,022
Land Farm	MT	6,587
Recovery	MT	2,662
Fuel Blending	MT	1,111
Other*	MT	756

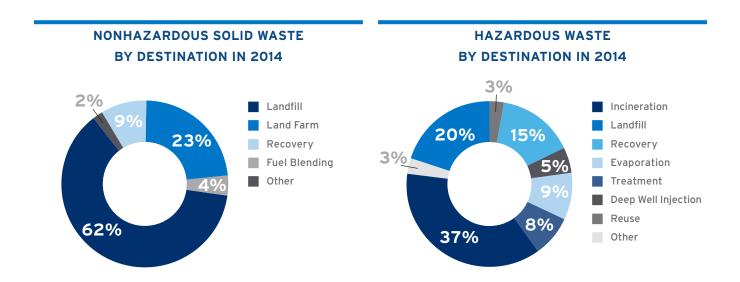
^{*}Other includes incineration, composting, etc.

HAZARDOUS WASTE BY DESTINATION

	Units	2014
Incineration	MT	11,713
Landfill	MT	6,219
Recovery	MT	4,709
Evaporation	MT	2,796
Treatment	MT	2,634
Deep Well Injection	МТ	1,724
Reuse	МТ	1,103
Other**	МТ	802

^{**}Other includes co-processing, fuel blending, etc.

TOTAL WEIGHT OF WASTE BY TYPE AND DISPOSAL METHOD (G4-EN23) (CONTINUED)



SOLID RECYCLED MATERIAL

	Units	2014
Solid Recycled Material	МТ	5,048

The scope of nonhazardous solid waste and hazardous waste by region and destination is global supply chain manufacturing facilities. The scope of solid recycled material data is global supply chain manufacturing facilities. We are unable to provide consistent scope of data prior to 2014.

TOTAL NUMBER AND VOLUME OF SIGNIFICANT SPILLS (G4-EN24)

In 2014, our operations did not experience spills of material significance to our company or the communities in which we operate.

WEIGHT OF TRANSPORTED, IMPORTED, EXPORTED OR TREATED WASTE DEEMED HAZARDOUS UNDER THE TERMS OF THE BASEL CONVENTION ANNEX I, II, III AND VIII, AND PERCENTAGE OF TRANSPORTED WASTE SHIPPED INTERNATIONALLY (G4-EN25)

All hazardous waste that leaves Ecolab facilities is shown in EN23, along with any treated hazardous waste by weight, type and region.

IDENTITY, SIZE, PROTECTED STATUS AND BIODIVERSITY VALUE OF WATER BODIES AND RELATED HABITATS SIGNIFICANTLY AFFECTED BY THE ORGANIZATION'S DISCHARGES OF WATER AND RUNOFF (G4-EN26)

For each facility, the size of the water source itself, biodiversity value and value or importance of the water source to local communities and indigenous peoples is reported in our CDP Water response. None of the river basins and water sources are designated as protected areas (nationally or internationally). For more information about Ecolab's approach to water management, identification of facilities where water risk may exist and how Ecolab is managing these risks and opportunities as they relate to water, please refer to our CDP Water submission, available at cdp.net.

MONETARY VALUE OF SIGNIFICANT FINES AND TOTAL NUMBER OF NONMONETARY SANCTIONS FOR NONCOMPLIANCE WITH ENVIRONMENTAL LAWS AND REGULATIONS (G4-EN29)

Ecolab is aware of a relatively small number of noncompliance issues and has a proactive and robust compliance program to address them promptly and completely. None of these issues resulted in material fines or penalties to the company under applicable reporting requirements.

PERCENTAGE OF NEW SUPPLIERS SCREENED USING ENVIRONMENTAL CRITERIA (G4-EN32)

Ecolab procures more than \$4.5 billion of direct raw material, contract manufacturing and equipment from more than 12,000 suppliers worldwide and manages distribution through various channels to external customers across 1.3 million locations.

All chemical raw materials suppliers are screened prior to using their materials in our products. They go through a rigorous process called ASAP (Alternate Supplier Approval Process) to evaluate suppliers for existing raw materials. Procurement evaluates the supplier based on service, quality, material specifications and price. The supplier then goes through a series of approval checks on the material to ensure it meets our specifications. Once approved, the supplier goes through our vendor setup process and a W9, and other data is obtained and verified by our Shared Services Group. The approval of the supplier's material goes through CQA, R&D (Technical Review), Regulatory Affairs (checks for FDA, EPA, Kosher, NSF, Halal), and Procurement (ethical sourcing).

In 2014, approximately 150 new suppliers were identified and 100 percent screened using the above criteria prior to initiating purchasing (or procurement) decisions.

SIGNIFICANT ACTUAL AND POTENTIAL NEGATIVE ENVIRONMENTAL IMPACTS IN THE SUPPLY CHAIN AND ACTIONS TAKEN (G4-EN33)

Suppliers must meet our Ethical Sourcing Standards regarding forced labor, child labor, health and safety in the workplace, fair pay, harassment, diversity and ethics, and environmental policies. Our supplier requirements are based on international standards including the United Nations Declaration of Human Rights, the United Nations Convention on the Rights of the Child, and the Conventions of the International Labor Organization, including its Fundamental Principles and Rights at Work. In 2014, we initiated the process to expand the scope of our sourcing requirements to consider the carbon emissions footprint of our individual suppliers, as well as the sum total impact of this component of our value chain.

In addition to the detailed supplier assessment completed by our top suppliers in order to verify compliance with Ecolab's ethical sourcing requirements, Ecolab has conducted a carbon impact analysis of our global suppliers in the chemical, packaging and equipment categories (the sum total of which make up nearly 50 percent of our total global supplier spend), the top 80 percent of which represent more than 400 suppliers. Through this analysis we have found that this component of our supply chain has a carbon footprint that is larger than our own scope 1 and 2 combined footprint, meaning there are potential environmental impacts associated with our supply chain.

NUMBER OF GRIEVANCES ABOUT ENVIRONMENTAL IMPACTS FILED, ADDRESSED AND RESOLVED THROUGH FORMAL GRIEVANCE MECHANISMS (G4-EN34)

In 2014, we did not receive material grievances about environmental impacts.

G4 SPECIFIC STANDARD DISCLOSURES SOCIAL: LABOR PRACTICES AND DECENT WORK

DISCLOSURE OF MANAGEMENT APPROACH

The following Disclosure of Management Approach covers labor practices and decent work aspects material to Ecolab as disclosed in this report.

Commitments

We are committed to a culture that fully leverages our employees' talents by promoting an environment where all people can make a difference, be heard, be supported, be developed and be rewarded for their contributions. We value the energy, ideas and ultimate success that diversity brings to our industry, our company and the global community we serve.

Ecolab takes our responsibility to our employees and our communities very seriously. We believe in compensating our employees fairly and in compliance with local laws. We promote the well-being of our employees and our customers by contributing to programs and initiatives that enhance the quality of life in the communities where they work and live.

The safety of our employees, contractors and customers is our number one priority. From the way we operate to the products we develop to the customers we serve, our commitment to safety is uncompromised.

Policies

Our Code of Conduct guides the way we conduct business internally and with our customers, suppliers and within the communities in which we operate. Ecolab adopted its first Code of Conduct policy in 1976. The policy was last amended on November 29, 2012. The Code of Conduct applies to all Ecolab officers, directors and employees. Ecolab intends to promptly disclose on our website should there be any further amendments to, or waivers by the board of directors of the Code of Conduct (ecolab.com/document-library/code-of-conduct).

Ecolab also has a Global Safety, Health & Environmental Position: <u>ecolab.com/sustainability/commitment-to-sustainability/people/committed-to-safety-and-health.</u>

Goals, Targets and Evaluation

SAFETY

Our goals are simple: zero accidents, zero injuries and zero violations. This is a collective goal in which each and every employee must commit to, own and deliver on safety – 24 hours a day, seven days a week, 365 days a year. We're supporting employees with proven safety programs, processes and platforms to help them achieve those goals.

Our training and onboarding programs help us achieve these goals and provide leading metrics upon which to measure company performance. We continue to refine these programs and expand the population impacted by these programs to improve our overall safety performance.

Safety Leadership Training: Safety Leadership is a half-day course designed to support
managers as they become more actively engaged as safety leaders. The course is delivered by
SH&E with support of business leaders.

- 2014 target: 100 percent of Executive Leaders for all Divisions and 100 percent of District Managers within WPS and ES complete the training
- 2014 performance: 80 percent (713 out of 890 leaders trained)
- Driver Safety Training: Behind-the-Wheel training is a course designed to teach vehicle control
 and accident avoidance techniques. Course and vendor suitability is determined by regional and
 market SH&E resources.
 - 2014 target: 100 percent of driver population has completed training within the last three years
 - 2014 performance: 93 percent (20,090 out of 21,489 drivers were trained within the last three years)
- Safety Onboarding: Divisional safety onboarding processes are designed to provide newly hired sales and service personnel with basic safety training. The training includes eight modules of cross-divisional training (SOS® Core) and additional division-specific content.
 - 2014 target: 100 percent of new employees trained within their first year
 - 2014 performance: 86 percent (2,042 out of 2,379 hired trained)

Understanding underlying and potential risks is a critical component to improving safety outcomes. Our Global Safety Dashboard tracks our performance on a range of leading and lagging safety indicators. This level of transparency helps us focus on areas of greatest needs and measure the effectiveness of our safety programs.

Our approach to safety communications is aimed at encouraging employees in the field, offices and plants to embrace safety as a personal issue. As part of those communications, we highlight different topics to encourage positive safety behaviors and awareness and eliminate risks. Safety is fully embedded into our company values.

EMPLOYMENT

Thanks to the hard work and leadership of more than 45,000 employees, Ecolab is the global leader in water, hygiene and energy technologies and services. Around the world, businesses in food service, food processing, hospitality, healthcare, industrial, and oil and gas markets choose Ecolab products and services to keep their environments clean and safe, to operate efficiently and to achieve sustainability goals.

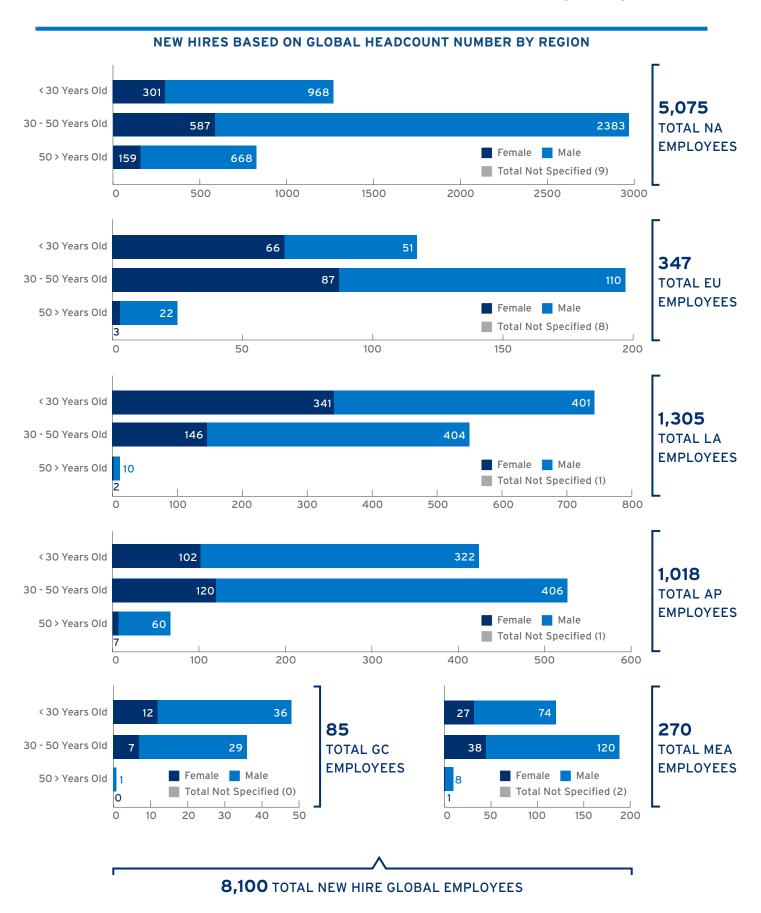
Not surprisingly, Ecolab's growth means many challenging career opportunities are available across our company. "Days to Fill" (DTF), one of the many key performance indicators we track to measure the strength of our career management and hiring programs, provides an indicative metric of the average number of days it takes to fill an open position within our global business. In 2014, our global average DTF was 59 days, which serves as our baseline metric. We have set a 2015 goal of 56 days, representing a 5 percent reduction goal.

In 2013, we completed a transition of our global Human Resources systems following the integration of our companies and therefore are unable to provide data prior to 2014.

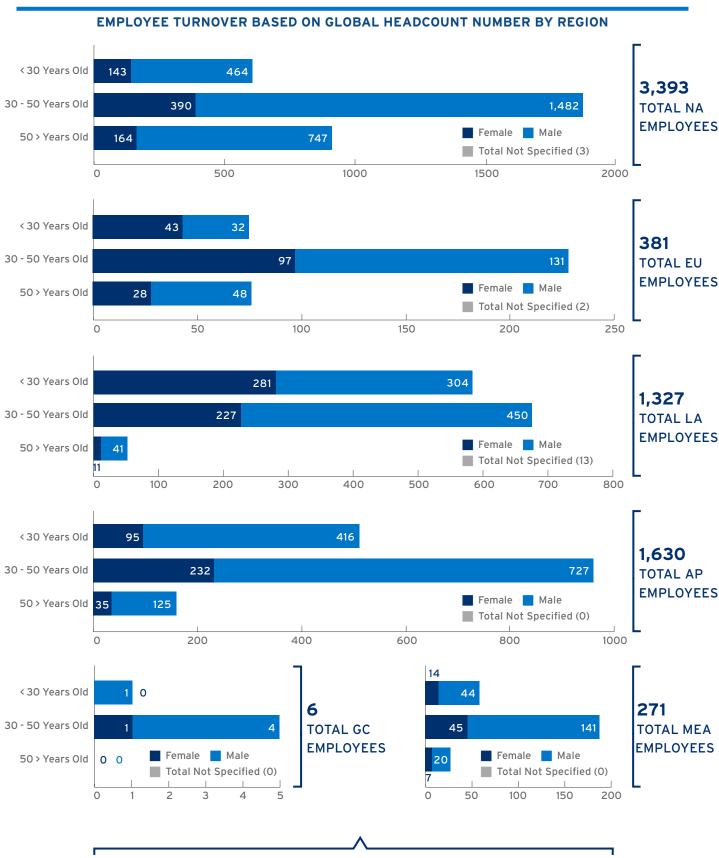
Responsibilities

Our commitment is supported by an engaged Executive Safety Leadership Council, active Regional Safety Leadership Councils in all regions and large markets and a Board of Directors Safety, Health and Environment Committee.

TOTAL NUMBER AND RATES OF NEW HIRES AND EMPLOYEE TURNOVER (G4-LA1)



TOTAL NUMBER AND RATES OF NEW HIRES AND EMPLOYEE TURNOVER (G4-LA1) (CONTINUED)



BENEFITS PROVIDED TO FULL-TIME EMPLOYEES THAT ARE NOT PROVIDED TO TEMPORARY OR PART-TIME EMPLOYEES (G4-LA2)

Ecolab provides market-competitive benefits based on country-specific needs and government requirements. All United States employees scheduled to work 20 hours or more per week are eligible for Ecolab's benefits package. Excluded employees include temporary, contract, intern, co-op and seasonal employees. (Excluded employees account for less than 1 percent of total workforce). An overview of our United States benefits is available at ecolab.com/careers/benefits.

RETURN TO WORK AND RETENTION RATES AFTER PARENTAL LEAVE (G4-LA3)

Ecolab does not provide any type of paid parental leave (regardless of gender).

Globally, parental leaves and time away are handled in accordance with each country's local laws pertaining to time away from work. There is not a global policy or program. We do not track leaves by reason or retention rates after any type of leave.

In the United States, there are a number of ways U.S. employees are able to take time away from work as parents:

- Parents (regardless of gender) are able to apply for up to 12 weeks of unpaid leave under FMLA (if employed for one year and working 1,250 hours within that year) following a birth or adoption. FMLA leave details are in accordance with federal, state and local laws and include same-sex and opposite-sex relationships. We do not track FMLA leaves by reason or retention rates after any type of leave.
- Women may be eligible for short-term disability pay (they must work 20-plus hours per week to be eligible) for a period of time following a birth for which they are medically disabled (time runs concurrent with FMLA).
- Employees are encouraged to use their paid time off or vacation to spend time with their families. Extended vacations (if time is available) may be coordinated with manager's approval.

MINIMUM NOTICE PERIODS REGARDING OPERATIONAL CHANGES (G4-LA4)

Ecolab had three U.S.-based collective-bargaining agreements in 2014. For these agreements, a minimum of 60 days' notice prior to the contract end date is required to propose any changes to the contract agreements. All collective-bargaining agreements contain a specified notice period and provisions for consultation and negotiation. Approximately 38 percent of employees covered by a collective-bargaining agreement are in Texas. Approximately 62 percent of employees covered by a collective-bargaining agreement are in Illinois.

TYPE OF INJURY AND RATES OF INJURY, OCCUPATIONAL DISEASES, LOST DAYS AND ABSENTEEISM AND TOTAL NUMBER OF WORK-RELATED FATALITIES (G4-LA6)

INJURY RATE + OCCUPATIONAL DISEASE RATE (TRIR) TOTAL RECORDABLE INJURY RATE (TRIR)

(Number of injuries and illnesses per 100 workers)

Global	1.60
NA	2.21
LA	1.15
AP	0.83
EU	1.00
MEA	0.25

Global: WPS/Energy Services	0.66
NA	0.89
LA	0.70
AP	0.39
EU	0.50
MEA	0.25

Global: All Other Ecolab Divisions	2.93
NA	4.17
LA	2.17
AP	1.27
EU	1.67
MEA	0.38

LOST DAY RATE:

(Lost days per 100 workers)

Global One Ecolab	23.6
NA	36.2
LA	8.8
AP	0.4
EU	21.0
MEA	0.5

Global: WPS/Energy Services	5.7
NA	6.1
LA	7.3
AP	0.2
EU	10.5
MEA	0.4

Global: All Other Ecolab Divisions	34.0
NA	52.4
LA	10.3
AP	0.6
EU	25.5
MEA	0.6

Fatalities	4
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This information cannot be broken down by gender and does not include data for independent contractors.

All global operations conform with OSHA injury-reporting standards.

Ecolab has a corporate-wide goal of zero accidents and injuries.

WORKERS WITH HIGH INCIDENCE OR HIGH RISK OF DISEASES RELATED TO THEIR OCCUPATIONS (G4-LA7)

None.

HEALTH AND SAFETY TOPICS COVERED IN FORMAL AGREEMENTS WITH TRADE UNIONS (G4-LA8)

All (100 percent or three out of three contracts) formal collective-bargaining agreements between Ecolab and U.S.-based trade unions cover health and safety topics. The employees participate in health and safety training. All formal collective-bargaining agreements between Ecolab and U.S.-based trade unions contain mechanisms for complaints. All employees covered by collective-bargaining agreements may also report complaints through Ecolab's Code of Conduct hotline.

AVERAGE HOURS OF TRAINING PER YEAR PER EMPLOYEE (G4-LA9)

Of the many key performance indicators we track to measure the strength of our human capital development and training programs, average hours of Training & Development per FTE provides an indicative metric for our business. Following integration of our companies over the 2011-2013 period, we are nearing completion of aligning our global human resource systems, programs and data collection, management and reporting capabilities. This continued in 2014 with the planning and configuration to prepare for the launch of Ecolab OneHR in 2016, a cloud-based global platform that will provide workforce insights and enable actionable analytics and enterprise-level reporting. The program will align and help manage global talent by providing an enterprise wide visibility of employees, online talent processes and profiles, and enable employees to manage their individual career and team goals.

In 2014, our global average hours of Training & Development per FTE was 65.23, inclusive of our WPS, Energy and Institutional global divisions which represents 45 percent of our global employees. Based on our integration and launch of the OneHR program, this will serve as a baseline performance metric to enable future goal setting as we roll out data reporting globally.

PROGRAMS FOR SKILLS MANAGEMENT AND LIFELONG LEARNING THAT SUPPORT THE CONTINUED EMPLOYABILITY OF EMPLOYEES AND ASSIST THEM IN MANAGING CAREER ENDINGS (G4-LA10)

Our global Performance Planning and Development (PP+D) program aims to provide a framework to guide employee performance and development.

- We have a CEO-led Talent Council that meets monthly to review all top talent, as well as Talent Councils throughout our businesses and regions to discuss critical roles and strategic talent issues.
- In 2014, we introduced our Ecolab Leadership Model which articulates a set of expected behaviors for leaders at all levels. These expectations include: Envision, Empower, Energize, Execute and Embody.
- We have corporate flagship development programs that are offered as people make turns in their career from Leading Self to Leading Others and also from Leading Others. These flagship offerings are aimed at building leaders' capabilities. We offer an extensive catalog of online training provided by Harvard Business Publishing called Harvard Manage Mentor. In late 2014, we scaled these programs to deliver front-line manager training in each of our regions outside of the United States.
- As a supplement to the corporate offerings, divisions and functions, we have additional development options that are specific to their areas. (Examples include: Institutional, Energy Services, Food and Beverage, WPS and Healthcare.)

Ecolab believes in supporting the continuous learning and development of employees and also offers an educational assistance program in the United States. This program provides eligible employees an opportunity to receive financial reimbursement upon successful completion of approved educational programs and courses offered by colleges, business schools or technical schools that are accredited by the Council for Higher Education Accreditation (CHEA).

While no specific package is given when employees voluntarily retire, employees receive generous payout of vacation (greater than voluntary separations).

In circumstances in which employment is involuntarily terminated as a result of a number of circumstances such as restructuring, redundancy, change in business strategy or other reason, a severance package is provided. The severance calculation takes into account the years of service of the employee, providing greater benefit to those with greater seniority.

- Employees that receive a severance package continue their medical and dental benefits and group life insurance through their severance period at the same cost. If vested, their pension benefits will be calculated for them.
- Severance-eligible employees receive access to outplacement services ranging from one month
 to one year based on their organizational level. This service aids with dealing with transition,
 defining career objectives, resume and interview preparation, access to career fairs and job
 postings with other companies.
- Employees and their immediate families maintain the benefits of the Employee Assistance
 Program through their severance period to address questions and concerns with their
 non-working life as well as the career transition.

PERCENTAGE OF EMPLOYEES RECEIVING REGULAR PERFORMANCE AND CAREER-DEVELOPMENT REVIEWS (G4-LA11)

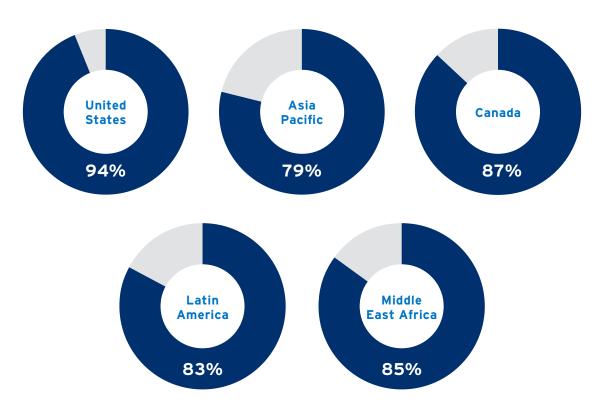
Ecolab is committed to providing an effective performance-planning and development system that provides employees and their managers with the tools and processes to help employees optimize their performance. All Performance Planning and Development (PP+D) tools are housed and accessible to all employees in nine languages, with the forms available in 25 languages. Ecolab is committed to achieving 100 percent coverage of our employees, male and female and by all employee types, covered through a predefined, standardized and annual performance-appraisal process.

The annual review is one of the tools found in the PP+D toolkit, with the expectation that all employees have an annual review. Annual reviews consist of three sections:

- 1) Past-year results summary
- 2) Objectives for new year
- 3) Coaching and development plan

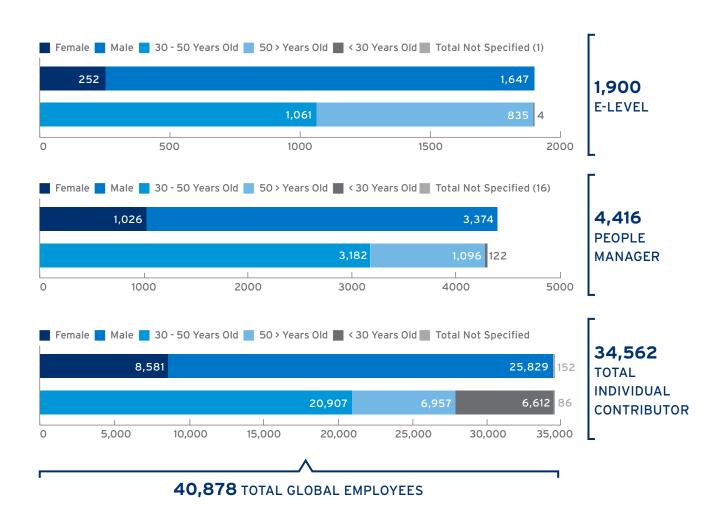
Annual reviews for calendar year 2013 performance were conducted in 2014.

PERCENTAGE OF EMPLOYEES WHO RECEIVED A REVIEW IN 2014 BY REGION



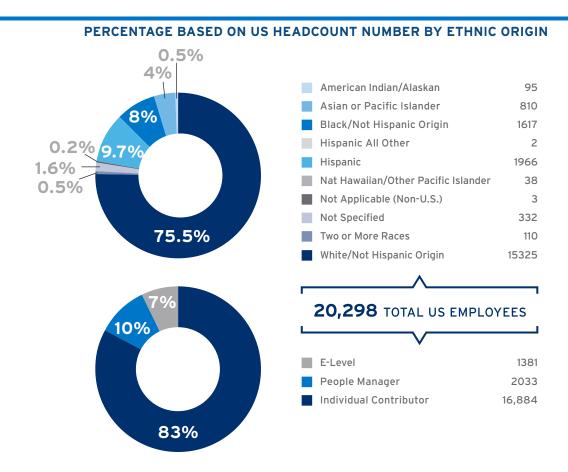
COMPOSITION OF GOVERNANCE BODIES (G4-LA12)

PERCENTAGE BASED ON GLOBAL HEADCOUNT NUMBER BY GENDER AND AGE GROUP



Global headcount data included in this section does not include Ecolab Europe employees.

COMPOSITION OF GOVERNANCE BODIES (G4-LA12) (CONTINUED)



PERCENTAGE OF NEW SUPPLIERS SCREENED USING LABOR PRACTICES CRITERIA (G4-LA14)

In 2014, we strengthen our Ethical Sourcing Survey process by establishing a cadence to survey our global suppliers. In 2014, all North American Contract Manufacturers completed the Ethical Sourcing Survey. In 2015, Global Contract Manufacturers and suppliers that comprise more than 80 percent of Ecolab spend globally by category and region will be surveyed.

Ecolab's Ethical Sourcing Survey covers employment practices, safety practices, wages and compensation, child and slave labor, and working hours and serves as a benchmarked survey of our ethical sourcing practices. It is not our practice to screen all new suppliers using the Ethical Sourcing Survey.

Supplier Code of Conduct: http://www.ecolab.com/~/media/Ecolab/Ecolab%20Home/Documents/
DocumentLibrary/Manuals/SupplierCodeofConduct.ashx

SIGNIFICANT ACTUAL AND POTENTIAL NEGATIVE IMPACTS FOR LABOR PRACTICES IN THE SUPPLY CHAIN AND ACTIONS TAKEN (G4-LA15)

In 2014, we did not identify any operations or suppliers with actual or potential negative labor practices in our supply chain. We continue to evaluate our suppliers for any negative human rights impacts via the Ethical Sourcing Survey. In addition, we utilize a Supplier Code of Conduct hotline to facilitate reporting by anyone concerned about potential violations.

LABOR IMPROVEMENT PROJECT

Each day the field sales and service representatives of Nalco, Ecolab's Water & Process Services Division (WPS), interact with our customers at their sites, to minimize energy and water consumption, ensure proper application of our products, and reduce our customers' total cost of operations. In accomplishing these objectives, our field representatives regularly encounter information needs that are readily addressed by access to our Knowledge Management environment. This environment houses content about products, equipment and industrial processes. The content is created and maintained by Nalco's global subject matter experts.

In 2014 the business partnered with the divisional WPS Enterprise Excellence team to investigate ways to improve the transfer of knowledge mechanisms from subject matter experts to field representatives. The Enterprise Excellence project resulted in three major improvement opportunities.

- 1) Improvements to the library structure resulting in easier access to content for the field representatives.
- 2) Improvements to content findability and usability resulting in more relevant search results and less time spent looking for content.
- 3) Development and deployment of a Search App for use on mobile smart phones allowing for immediate access to content in the libraries.

The business and social impacts of these improvements were significant. Combined, these efforts resulted in productivity savings on a global basis in 2014 of 26,700 man-hours of sales representative time, valued at \$2.3M. The introduction of the mobile app in particular contributed the largest savings. The field representatives utilizing the mobile app were able to stay in their workflow and address customer needs far quicker than they had been able to in the past. The time saved allows sales to spend more time on value-added activities, such as prospecting, servicing existing customers and solving problems as well as recognizing new revenue sooner.

Nalco has twice been named a Best Practice Partner (2012, 2014) in Knowledge Management by the American Productivity & Quality Center (APQC). This project received nomination and was a finalist as an Ecolab Green Belt Project of the Year in 2014.

Ecolab 2014 Corporate Sustainability Report

G4 SPECIFIC STANDARD DISCLOSURES SOCIAL: HUMAN RIGHTS

DISCLOSURE OF MANAGEMENT APPROACH

The following Disclosure of Management Approach covers human-rights aspects material to Ecolab as disclosed in this report.

Commitment

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 and comply with laws and regulations. Our Human Rights Policy and Code of Conduct guide the way we conduct business internally, and with our customers, suppliers and within the communities in which we operate.

Our Human Rights Policy

As a global company, Ecolab is committed to enhancing the well-being of people and communities around the world.

Our employees' human rights are respected across our global operations and we are committed to respecting the international human-rights standards defined by the United Nations Global Compact. We aspire to create an inclusive and respectful work environment, one in which employees recognize each other's worth and dignity.

As stated in our Code of Conduct, any conduct that detracts from the worth and dignity of our employees is contrary to our values and has no place in our culture. We also are committed to showing respect to people and cultures in all of the countries where we do business.

Learn more about United Nations Global Compact Commitment: unglobalcompact.org

In addition, our Ethical Sourcing Standards and Conflict Minerals Policy are available at ecolab.com/sustainability/commitment-to-sustainability/ethical-sourcing

Our Supplier Code of Conduct describes Ecolab's expectations for its suppliers in the areas of integrity, ethical and legal standards, compliance, confidentiality, gifts, gratuities and business meals, labor rights and employment law, health and safety, environment, anti-bribery and corruption, fair competition and supplied materials (Supplier Code).

 $\frac{\text{http://www.ecolab.com/}{\sim}/\text{media/Ecolab/Ecolab%20Home/Documents/DocumentLibrary/Manuals/}{\text{SupplierCodeofConduct.ashx}}$

Goals, Targets and Evaluation

It is Ecolab's policy to disclose any human-rights controversies that may relate to labor issues, child employment, female or minority rights infringement or other issues pertaining to human rights.

TOTAL HOURS OF EMPLOYEE TRAINING ON HUMAN RIGHTS POLICIES OR PROCEDURES CONCERNING ASPECTS OF HUMAN RIGHTS THAT ARE RELEVANT TO OPERATIONS (G4-HR2)

Ecolab's Code of Conduct contains detailed human-rights aspects of relevance to our operations. All (100 percent) of new employees participate in a facilitated two-hour training session on the Code of Conduct. On an annual basis, all (100 percent) Ecolab employees are required to participate in a 45-minute Code of Conduct online training module and provide a signature of completion and compliance.

See Code of Conduct: ecolab.com/document-library/code-of-conduct/

OPERATIONS AND SUPPLIERS IDENTIFIED IN WHICH THE RIGHT TO EXERCISE FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING MAY BE VIOLATED OR AT SIGNIFICANT RISK (G4-HR4)

We adhere to National Labor Relations Board protocols to support employee rights to exercise freedom of association and collective bargaining. We recognize employees' right to form or join unions and encourage them to make an informed decision on the matter. Where employees have chosen to be represented by a labor union, we fulfill our bargaining obligations as defined by law. We have not identified any U.S.-based operations at which freedom of association and collective bargaining may be violated or at risk.

We are unable to report on violations or risks of our suppliers.

OPERATIONS AND SUPPLIERS IDENTIFIED AS HAVING SIGNIFICANT RISK FOR INCIDENTS OF CHILD LABOR AND MEASURES TAKEN TO CONTRIBUTE TO THE ABOLITION OF CHILD LABOR (G4-HR5)

Ethical Sourcing represents a global supply-chain initiative requiring our direct suppliers to protect the health, safety and human rights of their employees. Suppliers must meet standards regarding forced labor, child labor, health and safety, fair pay and harassment in the workplace. A statement about Ecolab's commitment to protecting human rights is located on our website.

In 2014, we strengthened our Ethical Sourcing Survey process by establishing a cadence to survey our global suppliers. In 2014, all North American Contract Manufacturers completed the Ethical Sourcing Survey. In 2015, Global Contract Manufacturers and suppliers that comprise more than 80 percent of Ecolab spend globally by category and region will be surveyed. This survey covers child and slave labor. As suppliers are surveyed, all red flag suppliers have additional follow up and corrective actions which can result in termination of our relationship.

We follow a rigorous supplier-screening process that includes an initial Ethical Sourcing Survey, annual compliance training by our associates (which is documented) and efforts by our Quality Function to continue to stress the importance of human rights through physical audits.

In 2014, we did not identify any operations or suppliers at significant risk of incidents of child labor or young workers exposed to hazardous risk. We do have operations in geographic areas considered at risk for child labor, including China and India. If we find out that one of our suppliers is using child labor, we will take the appropriate steps necessary.

OPERATIONS AND SUPPLIERS IDENTIFIED AS HAVING SIGNIFICANT RISKS FOR INCIDENTS OF FORCED OR COMPULSORY LABOR AND MEASURES TO CONTRIBUTE TO THE ELIMINATION OF ALL FORMS OF FORCED OR COMPULSORY LABOR (G4-HR6)

Ethical Sourcing represents a global supply-chain initiative requiring our direct suppliers to protect the health, safety and human rights of their employees. Suppliers must meet standards regarding forced labor, child labor, health and safety, fair pay and harassment in the workplace. Ecolab's commitment to protecting human rights is located on our website.

In 2014, we strengthened our Ethical Sourcing Survey process by establishing a cadence to survey our global suppliers. In 2014, all North American Contract Manufacturers completed the Ethical Sourcing Survey. In 2015, Global Contract Manufacturers and suppliers that comprise more than 80 percent of Ecolab spend globally by category and region will be surveyed. This survey covers employment practices, safety practices, wages and compensation, child and slave labor, and working hours and serves as a benchmarked survey of our ethical sourcing practices. It is not our practice to screen all new suppliers using the Ethical Sourcing Survey. As suppliers are surveyed, all red flag suppliers have additional follow up and corrective actions which can result in termination of our relationship.

We follow a rigorous supplier-screening process that includes an initial Ethical Sourcing Survey, annual compliance training by our associates (which is documented) and efforts by our Quality Function to continue to stress the importance of human rights through physical audits.

In 2014, we did not identify any operations or suppliers at significant at risk of incidents of forced or compulsory labor. We do have operations in geographic areas considered at risk for forced labor, including China and India. If we find out that one of our suppliers is using forced or compulsory labor, we will take the appropriate steps necessary.

PERCENTAGE OF SECURITY PERSONNEL TRAINED IN THE ORGANIZATION'S HUMAN RIGHTS POLICIES OR PROCEDURES THAT ARE RELEVANT TO OPERATIONS (G4-HR7)

Security of Ecolab facilities is performed by Ecolab employees and third-party personnel. All (100 percent) Ecolab employees serving as security personnel are required to complete Ecolab's Code of Conduct training on an annual basis. Ecolab's Code of Conduct does not apply to third-party organizations providing security personnel to Ecolab facilities.

TOTAL NUMBER AND PERCENTAGE OF OPERATIONS THAT HAVE BEEN SUBJECT TO HUMAN-RIGHTS REVIEWS OR IMPACT ASSESSMENTS (G4-HR9)

Globally, Ecolab is a signatory to the UN Global Compact (UNGC) and has put in place programs in regions to assess conformity and ensure our policies are in place and in practice. Human rights issues identified within the UNGC framework are incorporated in Ecolab's Code of Conduct policy. In North America, where 45 percent of our employees are located, 100 percent of our operations have been subject to human-rights reviews or human-rights impact assessments in 2014. Human Resources regularly visits the plants and confirms compliance with our employee handbook. This set of policies is fully aligned with corporate policies but also addresses situations specific to the plants. We also have annual Code of Conduct and workplace-respect training at the plants.

In Latin America, 100 percent of our operations follow local legislation as it relates to human-rights reviews or human-rights impact assessments. Human Resources regularly visits the plants and confirms compliance with our employee handbook. This set of policies is fully aligned with corporate policies but also addresses situations specific to the plants. We also have annual Code of Conduct and workplace-respect training at the plants. Additionally, our operations are periodically audited and approved by global and local customers, who check, among other items, human-rights-related aspects.

In China and our locations in Southeast Asia, including Australia and New Zealand, 100 percent of our operations are subject to human-rights reviews or human-rights impact assessments, specific to ensuring that our Code of Conduct is communicated and made appropriate for local markets.

In India, human-rights reviews are conducted and are regularly reported to the government authorities.

In Japan, Korea and, Europe, Middle East and Africa, 100 percent of our employees complete Code of Conduct training and certification.

PERCENTAGE OF NEW SUPPLIERS SCREENED USING HUMAN-RIGHTS CRITERIA (G4-HR10)

We utilize an Ethical Sourcing Survey to screen our most material suppliers. In 2014, we strengthened our Ethical Sourcing Survey process by establishing a cadence to survey our global suppliers. In 2014, all North American Contract Manufacturers completed the Ethical Sourcing Survey. In 2015, Global Contract Manufacturers and suppliers that comprise more than 80 percent of Ecolab spend globally by category and region will be surveyed.

Ecolab's Ethical Sourcing Survey covers employment practices, safety practices, wages and compensation, child and slave labor, and working hours and serves as a benchmarked survey of our ethical sourcing practices. It is not our practice to screen all new suppliers using the Ethical Sourcing Survey.

Ecolab also supports the efforts of human rights organizations to end violence and atrocities in Central Africa, specifically the Democratic Republic of the Congo (DRC) and nine adjoining countries. A major driver of this violence is the natural abundance of the minerals tin, tungsten, tantalum, and gold, collectively referred to as "conflict minerals," with armed groups fighting for control of mines in this region and using forced labor to mine and sell the minerals.

In 2013, Ecolab initiated development of a process for managing conflict minerals in our supply chain, as we are subject to the final rule regarding sourcing of these minerals as defined in the Dodd-Frank Wall Street Reform and Consumer Protection Act, Section 1502, approved by the United States Securities and Exchange Commission (SEC) in August 2012. This included adoption and communication to our suppliers of a Conflict Minerals Policy, which includes our expectations for our suppliers with regard to ensuring conflict-free supply chains.

In 2014, we became members of the Conflict-Free Sourcing Initiative (CFSI) as a means of supporting the independent third-part audit process for smelters and refiners. We finalized and implemented our conflict minerals reporting process for the 2013 reporting year, which included a robust process for scoping our products for the inclusion of conflict minerals as well as conducting a reasonable country-of-origin inquiry of the direct suppliers of the products believed by us to contain conflict minerals. These efforts culminated in our filing of the Form SD and Conflict Minerals Report with the SEC. For the 2013 reporting year, notwithstanding our compliance efforts, we were unable to determine the country of origin for a portion of the necessary conflict minerals contained in our in-scope products. However, none of the necessary conflict minerals contained in our in-scope products were determined by us to directly or indirectly finance or benefit armed groups in the DRC or an adjoining country.

SIGNIFICANT ACTUAL AND POTENTIAL NEGATIVE HUMAN-RIGHTS IMPACTS IN THE SUPPLY CHAIN (G4-HR11)

In 2014, we did not identify any operations or suppliers with actual or potential negative humanrights impacts. We continue to evaluate our suppliers for any negative human rights impacts via the Ethical Sourcing Survey. We utilize a Supplier Code of Conduct hotline to facilitate reporting by anyone concerned about potential violations.

G4 SPECIFIC STANDARD DISCLOSURES SOCIAL: SOCIETY

DISCLOSURE OF MANAGEMENT APPROACH

The following Disclosure of Management Approach covers society aspects material to Ecolab as disclosed in this report.

Commitment

Our principles guide how we conduct business every day. We work hard to manage our global operations with care for the health, safety and prosperity of our employees, customers, communities and the environment. Everyone on the Ecolab team, regardless of role, is committed to these principles.

ECONOMIC: Drive economic growth for our customers, employees, shareholders and communities.

- Provide customers with products and services that create value and protect capital assets.
- Deliver superior shareholder value by helping our customers grow around the world.

ENVIRONMENTAL: Promote stewardship of natural resources and protect the environment.

- Respect and support the human right to water by conserving, reusing and recycling water and renewing water quality.
- Support society's need for increased energy through sustainable sources, products and technologies and efficient processes.
- Challenge the concept of waste through innovative and efficient use of resources, minimizing emissions to air, water and land.

SAFETY: Ensure safe processes that protect our employees, contractors, customers and communities

- Ensure safety throughout the life cycle of each of our products.
- Train all employees to work safely, preventing injuries to themselves and others.
- Identify and address process-safety risks and strive for continuous improvement, with the goal of zero injuries, illnesses and incidents.

SOCIAL: Enhance the well-being of people and communities.

- Conduct business fairly and ethically, respecting human rights, complying with laws and regulations and following a rigorous Code of Conduct.
- Support communities through charitable giving and community involvement.

Policies

Our Code of Conduct is the foundation that guides the way we conduct business internally, and with our customers, suppliers and within the communities in which we operate: ecolab.com/ document-library/code-of-conduct/.

Goals, Targets and Evaluation

Through auditable systems and open communications, we work to continuously improve outcomes and build a bright future for generations to come.

PERCENTAGE OF OPERATIONS WITH IMPLEMENTED LOCAL COMMUNITY ENGAGEMENT, IMPACT ASSESSMENTS AND DEVELOPMENT PROGRAMS (G4-S01)

Since 1986, the Ecolab Foundation has implemented community impact programs to support the communities where our employees live and work, focusing on giving to local nonprofit organizations in the areas of youth and education, civic & community development, arts & culture and environment & conservation. Since the inception of the Ecolab Foundation, the company has contributed over \$81 million to nonprofit organizations. In 2014, Ecolab contributed more than \$14 million to local communities through corporate giving, in-kind donations and the value of employee volunteerism*.

Through our Community Relations Council program, more than 75 percent of our United States manufacturing locations have implemented local community engagement programs. Through corporate giving initiatives, 100 percent of our United States corporate facilities have implemented local community engagement programs. Globally, all Ecolab employees have access to team volunteer grants to implement community volunteer programs through approved partners.

Specific examples of how our commitment to giving back impacts local communities include:

- Ecolab's Visions for Learning provides grants to teachers to augment student curriculum in their classrooms to directly impact learning and achievement. Since the inception of this program in 1986, more than \$12 million dollars has supported teachers and students in communities where Ecolab has significant operations. In 2014, \$1 million in grants was distributed to classrooms in 270 schools across the United States, positively impacting more than 135,000 students (a nine percent increase in grant funding and six percent in number of classrooms impacted over 2013). (Grant seekers are required to indicate demographics of their school's population including students who receive free and reduced lunch (the generally accepted marker for low-income households) as well as an ethnic breakout of the school's students. This information provides the review committees with a snapshot of the socioeconomic status of the school population to help ensure funds are reaching students most in need.)
- In St. Paul, Minn., the location of Ecolab's world headquarters, 64 percent of our local Youth and Education contributions supported the Saint Paul Public Schools (SPPS) in 2014 (Youth and Education represented 24 percent of the Foundation's total budget in 2014). Our significant partnership with SPPS helps drive the improved graduation rate, as well as college preparation and access to college for local students. In a press release dated February 24, 2015, SPPS reported, "Student graduation rates rise for the sixth consecutive year," with an overall graduation rate of 76 percent, surpassing the district's goal of 75 percent.
- In 2014, Ecolab provided 11 percent of the funds directed to SPPS's Humboldt High School, where 93 percent of the students qualified for free or reduced lunch (the generally accepted marker for low-income households), to support a tutoring program in partnership with Saint Paul Public Schools Foundation, as well as college preparatory and access programs, AVID and College Possible, respectively. On average, students participating in the tutoring (1:1 model) displayed growth of two points from fall to spring in 2014 on the MAP Reading Test and 5 points on the OLPA and MCA Math Tests. A report dated February 2015 indicated the impact of Ecolab investments in Humboldt have helped increase graduation rates from 44 percent in 2007 to 62 percent in 2013/14. Participants in the AVID program had a 100 percent graduation rate. Additionally, AVID program participants scored 11.3 percent higher on their state standardized reading test than the school average and 18.7 percent higher on math. In 2014, 80 percent of the students involved in the College Possible program were accepted to college.

In 2014, the Ecolab Foundation announced a three year, \$1.5 million partnership with the Project
WET Foundation. Through the partnership, Ecolab will support the Project WET Foundation
to reach more than two million people with water and hygiene education by 2017. Ecolab and
Project WET Foundation co-created the Clean and Conserve Education Program that teaches
about water conservation and the role that water plays in maintaining good health through
proper hygiene.

Protecting and Conserving Natural Environments

In 2014, the Ecolab Foundation announced a three-year, \$2 million partnership with The Nature Conservancy, a leading water and land conservation organization. The gift will support The Nature Conservancy's Securing and Restoring Water Sources Around the Globe initiative. Ecolab's funding will support The Nature Conservancy's new and ongoing efforts to protect key lands and waters in Minnesota, strategies to protect water resources in Shanghai and the expansion of efforts in the Monterrey, Mexico. The partnership will have measurable environmental impact in three areas where Ecolab has operations, including:

- ongoing land and water conservation activities in Minnesota
- strategies to protect water resources in Shanghai, where more than 24 million people depend largely on the Yangtze River for their water needs
- expanded efforts in the metropolitan area of Monterrey, Mexico, to reforest and implement other conservation methods to help slow the flow of water upstream from the city

Local community development programs based on local communities' needs

We are committed to empowering our employees to give back in communities where we have significant operations. To facilitate local engagement and impact, we have Community Relations Councils in 17 regional locations around the United States where we have more than 85 employees. Our local employees are most in touch with the needs of their communities. Community Relations Councils enable trained local Ecolab employee volunteers to administer Ecolab Foundation Community Grants and Visions for Learning teacher grants to deserving recipients in their communities where they believe our contributions can have the greatest impact.

Ecolab recognizes the contributions our individual employees make in their communities through a Volunteer Bonus Program and a Community Leadership Program, where applicants apply for a grant for their volunteer work and board leadership involvement at qualifying nonprofit agencies. In 2014, 700 grants were distributed under these programs, totaling more than \$240,000.

Ecolab's Team Volunteer Grants encourage associates across the United States to gather in groups of five or more to volunteer with select national partners that support individuals and families in need: Dress for Success, Habitat for Humanity and Feeding America (and affiliate food shelves). In 2014, the third year of this program, FIRST Robotics was introduced as a partner and the program was expanded globally through Habitat for Humanity. In 2014, we saw a 40 percent increase in the number of employees volunteering, totaling 2,900 hours. The Ecolab Foundation matched their volunteer efforts with grants to these organizations totaling more than \$92,000. For the first time since this program started, seven percent of Team Volunteer activity occurred in locations outside of the United States.

Disaster Response

As the world's leading supplier of cleaning and sanitizing products and solutions, Ecolab is very proud of our in-kind donation program where we annually donate needed cleaning, health and sanitizing products to organizations in areas where natural disasters have occurred, benefiting thousands. In 2014, more than \$1.7 million worth of Ecolab product donations went to world-wide relief efforts, including more than 108 tons directed to assist with the Ebola outbreak in Africa.

Measurement & Metrics

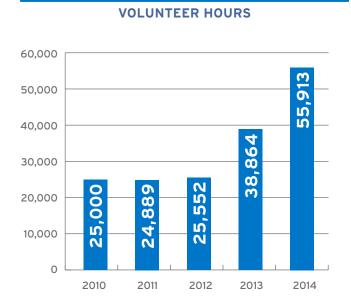
In 2015, we will be introducing new processes to more comprehensively gather impact metrics from grantees to assess the effectiveness of Ecolab Foundation grants. The formal processes will measure the overall difference Ecolab's grants make for the organizations and communities served, such as: how the grant helps grantees expand program reach, improve outcomes, develop new programs and enhance internal capacity. Results will be utilized by Ecolab Foundation staff to better understand how our investments are making a difference in our communities.

Additionally, beginning in 2015 Ecolab associates will complete a survey following each volunteer activity to help the Foundation measure the impact of volunteering on employee engagement, skills development and satisfaction of contributing to the community, as well as our associates' willingness to participate in future company-sponsored volunteer events.

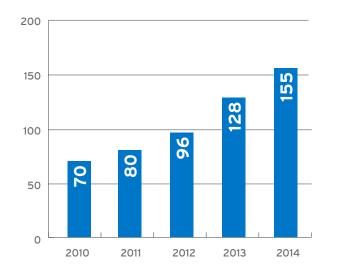
For additional information, refer to http://www.ecolab.com/about/corporate-responsibility/ community-involvement. Refer to CSR summary pages 41-46

In 2014, Ecolab associates volunteered more than 55,000 hours at 155 different events, which has a value of more than \$1.2 million*.

*according to the Independent Sector



VOLUNTEER EVENTS



OPERATIONS WITH SIGNIFICANT ACTUAL AND POTENTIAL NEGATIVE IMPACTS ON LOCAL COMMUNITIES (G4-S02)

None.

TOTAL NUMBER AND PERCENTAGE OF OPERATIONS ASSESSED FOR RISKS RELATED TO CORRUPTION AND SIGNIFICANT RISKS IDENTIFIED (G4-S03)

As part of the company's Internal Audit program, in connection with approximately 45 audits, approximately 110 local operating units (defined as a division within a country) out of several hundred globally were assessed for risks related to corruption.

In addition, the Compliance department completes various assessment activities for all regions and all business units, including related to recently acquired operations.

Few significant risks were identified, with risks relating to use of intermediaries being the highest risk area identified.

COMMUNICATION AND TRAINING ON ANTICORRUPTION POLICIES AND PROCEDURES (G4-S04)

Ecolab's anticorruption policies and procedures are communicated through the annual Code of Conduct training, which is mandatory for substantially all employees globally. Associates must complete Code of Conduct training on an annual basis (either online or through classroom-style training for plant employees). All governance body members are required to certify compliance with the Code of Conduct on an annual basis.

More detailed anticorruption training has been provided to the senior leaders in all regions – Europe, MEA, Greater China, Asia Pacific and Latin America. In addition to this training, which is provided to regional leaders, certain global-business-unit managers received more detailed anticorruption training, including the Energy Services business unit.

Our anticorruption policies require most intermediaries outside the United States to sign anticorruption representations, thus communicating our policies. In addition, in higher-risk countries, certain intermediaries have received training from company personnel.

TOTAL VALUE OF POLITICAL CONTRIBUTIONS (G4-S06)

Ecolab did not make any corporate political contributions in 2014.

Our associates have the opportunity to support the company's political action committee, the Ecolab Inc. Political Action Committee (ECOPAC). ECOPAC, which is funded by voluntary contributions from Ecolab associates, is a nonpartisan committee that supports candidates for Congress who share our basic philosophies and values, by contributing to legislators from both the Democratic and Republican parties representing a wide number of states where the company transacts business. Contributions are determined by a board of Ecolab executives based on criteria

including representation of Ecolab facilities and/or significant base of employees, committee membership, committee leadership, positions on the issues and partisan balance. ECOPAC does not support candidates for state, local or presidential office based on "nonbusiness" issues.

ECOPAC complies with all federal laws regarding reporting by political action committees and Ecolab complies with all federal and state laws relating to the reporting of political contributions. A list of all political contributions by ECOPAC and Ecolab will be posted semiannually to the Ecolab website under Political Contribution Reporting. Additionally, a list of contributions for the current election cycle made by ECOPAC is available at the Federal Election Commission's website.

TOTAL NUMBER OF LEGAL ACTIONS FOR ANTICOMPETITIVE BEHAVIOR, ANTITRUST AND MONOPOLY PRACTICES AND THEIR OUTCOMES (G4-S07)

None.

MONETARY VALUE OF SIGNIFICANT FINES AND TOTAL NUMBER OF NONMONETARY SANCTIONS FOR NONCOMPLIANCE WITH LAWS AND REGULATIONS (G4-S08)

In 2014, Ecolab did not incur significant fines (some minor fines were incurred) or nonmonetary sanctions other than, in limited circumstances, site-monitoring obligations related to environmental matters.

PERCENTAGE OF NEW SUPPLIERS SCREENED USING CRITERIA FOR IMPACTS ON SOCIETY (G4-S09)

We utilize an Ethical Sourcing Survey to screen our most material suppliers.

In 2014, we strengthened our Ethical Sourcing Survey process by establishing a cadence to survey our global suppliers. In 2014, all North American Contract Manufacturers completed the Ethical Sourcing Survey. In 2015, Global Contract Manufacturers and suppliers that comprise more than 80 percent of Ecolab spend globally by category and region will be surveyed.

Ecolab's Ethical Sourcing Survey covers employment practices, safety practices, wages and compensation, child and slave labor, and working hours and serves as a benchmarked survey of our ethical sourcing practices. It is not our practice to screen all new suppliers using the Ethical Sourcing Survey.

SIGNIFICANT ACTUAL AND POTENTIAL NEGATIVE IMPACTS ON SOCIETY IN THE SUPPLY CHAIN AND ACTIONS TAKEN (G4-S010)

In 2014, we did not identify any operations or suppliers with actual or potential negative labor practices in our supply chain. We continue to evaluate our suppliers for any negative human rights impacts via the Ethical Sourcing Survey. In addition, we utilize a Supplier Code of Conduct hotline to facilitate reporting by anyone concerned about potential violations.

G4 SPECIFIC STANDARD DISCLOSURES SOCIAL: PRODUCT RESPONSIBILITY

DISCLOSURE OF MANAGEMENT APPROACH

The following Disclosure of Management Approach covers product responsibility aspects material to Ecolab as disclosed in this report.

Commitment

We are committed to safety in our operations and to developing products that are safe for our customers and their intended application. We pay careful attention to ingredient responsibility, human health and environmental impact, without compromising performance. With products and services touching people every day in nearly every corner of the world, we have a responsibility to embed sustainability into every aspect of our innovations.

Our health and safety procedures for product formulation start with raw materials. Our product safety team screens all raw materials for chemicals of concern and each raw material is reviewed for regional and global chemical inventory compliance. This process informs final product safety analysis and safety data sheets (SDSs) for all Ecolab products.

Goals, Targets and Evaluation

Developed and launched in 2014, Ecolab uses a Customer Impact Product Profile (CIPP) to assess the sustainability attributes of our offerings across our entire product and service portfolio. The methodology is focused on the innovation management process to embed Product Responsibility and sustainability into our offerings in the design phase. This provides early and actionable information to the product development teams, early identification and substantiation of marketing claims, and ensures alignment and compliance with regulatory scorecards and aligns with our Responsible Care certification.

The CIPP process evaluates over 20 attributes related to human health, environmental safety, water and energy use, effluent and waste. This is a substance level evaluation and is aligned with the broadly recognized GHS (Globally Harmonized System for Classification and Labeling) endpoints. This process is used to evaluate multiple formula options for new product offerings. The CIPP report provides a detailed and factual view of any hazards and risks related to new products in development. Additionally, the process facilitates early design consideration of Ecolab's Value Capture framework (eROI). eROI impacts assess customer use phase impacts for 6 categories; Safety (human and environmental), Water, Energy, Air, Waste, and Asset protection.

Because sustainability is core to our purpose, we consider how each of our effective solutions improves efficiency, minimizes natural resource consumption, and improves safety - from sourcing, to manufacturing, to use, and through disposal. Below we outline our goals, KPI's and performance that demonstrate how we integrate these principles in our innovation process.

2014 Goal: Pilot-tested the CIPP process across Ecolab to ensure consistent and relevant analysis across our markets. This work resulted in documentation of a Standard Operating Procedure for this analysis.

2014 KPI: Number of CIPP project reviews completed (note this usually involves a review of multiple products for each project).

2014 Performance: Ecolab completed 17 CIPP project reviews, whose product five year peak annual sales exceed \$240 million and cover four of our largest divisions: Food & Beverage, Healthcare, Institutional and WPS.

2015 Goal: Complete CIPPs for our top products (as defined by projected revenue) in Global Industrial and Global Institutional application platforms.

Policies

Refer to <u>ecolab.com/sustainability/commitment-to-sustainability/ethical-sourcing</u> for our Ethical Sourcing Standards and Conflict Minerals Policy.

PERCENTAGE OF SIGNIFICANT PRODUCT AND SERVICE CATEGORIES FOR WHICH HEALTH AND SAFETY IMPACTS ARE ASSESSED FOR IMPROVEMENT (GR-PR1)

All of our products and services are evaluated for strict compliance with application regulatory requirements. Additionally, Ecolab introduced a broader customer-impact product-profile process that considers use-phase impacts of the product and system relevant in the customer application setting. Providing this information early in the development process enables informed choices regarding the system lifecycle impacts. In 2014, we managed 27 product profiles in the commercialization process. Through implementation of this profile, we are furthering our commitment to assessing and communicating important safety, health and environmental information about our new products.

TOTAL NUMBER OF INCIDENTS OF NONCOMPLIANCE WITH REGULATIONS AND VOLUNTARY CODES CONCERNING THE HEALTH AND SAFETY IMPACTS OF PRODUCTS AND SERVICES DURING THEIR LIFE CYCLES (GR-PR2)

Ecolab is aware of a relatively small number of noncompliance issues and has a proactive and robust compliance program to address them promptly and completely. None of these issues resulted in material fines or penalties to the company under applicable reporting requirements.

TYPE OF PRODUCT AND SERVICE INFORMATION REQUIRED BY THE ORGANIZATION'S PROCEDURES FOR PRODUCT AND SERVICE INFORMATION AND LABELING (GR-PR3)

Sourcing of components does not require product and service information and labeling.

We provide human health and environmental safety information on the top five components of each product via the SDS. Safe-use instructions for all of our products on the label and/or through our sales and service associates for all of our products. Globally, Ecolab distributes more than one million SDSs to customers annually in approximately 66 different country-specific templates and 43 languages.

Entirely 100 percent of our products are reviewed for appropriate ingredient disclosure and accurate use and application instructions. In countries where Globally Harmonized Systems (GHS) policies have been adopted and implemented, Ecolab provides products that are classified and labeled according to GHS rules.

TOTAL NUMBER OF INCIDENTS OF NONCOMPLIANCE WITH REGULATIONS AND VOLUNTARY CODES CONCERNING PRODUCT AND SERVICE INFORMATION AND LABELING (GR-PR4)

Ecolab is aware of a relatively small number of noncompliance issues and has a proactive and robust compliance program to address them promptly and completely. None of these issues resulted in material fines or penalties to the company under applicable reporting requirements.

RESULTS OF SURVEYS MEASURING CUSTOMER SATISFACTION (GR-PR5)

Our customer-satisfaction measurement process recognizes business differences and applies slightly different survey platforms to meet the needs of our business and our customers.

For example, our Water Processing and Energy Services divisions have more than 50 customer service call centers located around the globe, fielding more than 11 million calls annually. Customer-satisfaction surveys are conducted periodically and results are reviewed by business leaders.

Our goal is to deliver transformational solutions that exceed leading standards for performance and environmental outcomes. We can only achieve that goal when we truly understand our customers' operations, objectives and challenges. As a result, customer feedback is integral to Ecolab's business model. Customer input is gathered in many ways based on what best meets a business unit's needs. These include an in-house call center with 170 full-time associates who last year conducted more than 300,000 extra-service-request follow-up interviews (99.5 percent satisfaction) and 4,000 corporate-account satisfaction surveys with an average rating of 4.34 out of 5. External vendors are also employed to monitor customer satisfaction, reaching out to more than 12,000 customers a year. Additionally, Ecolab uses outside commissioned marketing research studies, ongoing customer site visits and field immersion, and top to top reviews with our largest customers to better understand customer needs.

Our surveys are analyzed and assured by our third party partner, Walker Information. Walker is a leading research firm whose expertise is Customer Satisfaction and who developed our internet-based data collection and reporting tool, known as SmartLoyalty.

For our Institutional business, we attempt to follow up on every customer service request called in to North America Customer Service. We completed 230,561 surveys in 2014. On the initial survey, customers were satisfied 95.5 percent of the time. For unsatisfied responses, we followed up with another survey 48 hours later, and at that time 99.8 percent of customers were satisfied.

SALE OF BANNED OR DISPUTED PRODUCTS (GR-PR6)

Ecolab operates worldwide, and its products and services are subject to numerous laws and regulations regarding product development and distribution. Ecolab attempts to comply with all relevant laws and regulations regarding product development and distribution and has a robust process for ensuring compliance.

TOTAL NUMBER OF INCIDENTS OF NONCOMPLIANCE WITH REGULATIONS AND VOLUNTARY CODES CONCERNING MARKETING COMMUNICATIONS (GR-PR7)
None.

TOTAL NUMBER OF SUBSTANTIATED COMPLAINTS REGARDING BREACHES OF CUSTOMER PRIVACY AND LOSSES OF CUSTOMER DATA (GR-PR8)

None.

MONETARY VALUE OF SIGNIFICANT FINES FOR NONCOMPLIANCE WITH LAWS AND REGULATIONS CONCERNING THE PROVISION AND USE OF PRODUCTS AND SERVICES (GR-PR9)

Ecolab is aware of a relatively small number of noncompliance issues and has a proactive and robust compliance program to address them promptly and completely. None of these issues resulted in material fines or penalties to the company under applicable reporting requirements.



Assurance Statement to Ecolab

This Assurance Statement has been prepared for Ecolab, Inc. (Ecolab).

Terms of Engagement

Anthesis (UK) Ltd (Anthesis) was engaged by Ecolab to provide limited assurance on its 2014 Corporate Social Responsibility (CSR) Summary and Global Reporting Initiative (GRI) Index. The objective of the assurance engagement was to provide an Assurance Statement based on a review of the above reports including reporting metrics, report content, and verification of a selection of material data.

The assurance engagement covered Ecolab's operations and activities worldwide. It excluded verification of greenhouse gas and water data, as these were to be verified separately by another assurance provider.

Responsibilities

Ecolab was responsible for preparing the CSR Summary and GRI Index and maintaining effective management systems to produce the data and information contained within the reports.

Anthesis was responsible for performing an assurance engagement to review the process, content and report outputs in accordance with our service contract with Ecolab.

Assurance Standard

AccountAbility AA1000 Assurance Standard (2008) – Type 2 Assurance

Reporting Criteria

AccountAbility AA1000 Principles Standard GRI Reporting Principles for Quality and Content

Methodology

Anthesis completed its review by testing the components of the Principles for Quality and Content (per GRI G4 Guidance). This activity also provided coverage across the three principles defined in the AA1000 Assurance Standard (Inclusivity, Materiality, Responsiveness).

Our assurance process included the following activities:

- A risk analysis to identify relevant issues related to Ecolab business activities
- A review of Ecolab strategies and goals for sustainability reporting
- A peer review of competitors and adjacencies to establish industry standards for reporting
- Evaluation of the reports and management systems that produced the report content
- Interviews with management and key personnel responsible for compiling the report data and information
- Sampling and verification of selected data, primarily from the following categories: Product Stewardship, Environmental Product Innovation, Customer Scorecarding & Reporting, Human Capital Management, Occupational Health & Safety, Labor Practices & Human Rights

Conclusion

Based on our activities nothing has come to our attention to indicate that the information and data in the 2014 CSR Summary and GRI Index reports are not materially correct, in accordance with the reporting criteria.

This opinion is based on a limited level of assurance and at the materiality of the professional judgment of the verifier.

Observations/Recommendations

- Ecolab's Stakeholder Engagement process would benefit from being expanded to include more stakeholders, particularly external. Documentation of this process and inclusion in reporting would improve transparency.
- A more comprehensive materiality assessment could be achieved by including additional stakeholder input based on an expanded Stakeholder Engagement process. Identification and inclusion of key material issues in the reports would increase transparency and demonstrate responsiveness.
- Ecolab has indirectly contributed to many positive impacts through its products and services to
 customers. While these impacts are notable, Ecolab also has many positive impacts resulting
 from direct company activities, and it would be worthwhile to increase the emphasis on the
 direct impacts in the reports.
- While Ecolab's data systems are largely automated, there are some areas where manual transcription of data occurs. Increased automation would improve data quality by minimizing the risk of human error.

Additional recommendations and details on findings were provided to Ecolab in a separate management report, and do not affect our opinion.

Competence & Independence

The assurance practitioners selected for this engagement were qualified to perform the services and were impartial and independent from the management systems and reports being audited.

Signed,

Ben Tuxworth

On behalf of Anthesis (UK) Limited. The Future Centre, 9, Newtec Place Magdalen Road

Oxford OX4 1RE

Dated: May 27, 2015