2013 CORPORATE SUSTAINABILITY REPORT GRI INDEX



GLOBAL REPORTING INITIATIVE CONTENT INDEX

Ecolab's 2013 Corporate Sustainability 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 most senior decision-maker of the organization	Fully	2013 Corporate Sustainability Report Summary pages 2-3
G4-2	Description of key impacts, risks and opportunities	Fully	2013 Sustainability Report Summary page 20 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 2013 Annual Report and Form 10-K
G4-5	Location of the organization's headquarters	Fully	370 Wabasha Street North, 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 2013 Annual Report and Form 10-K
G4-7	Nature of ownership and legal form	Fully	Ecolab's 2013 Annual Report and Form 10-K
G4-8	Markets served	Fully	Ecolab's 2013 Annual Report and Form 10-K

PROFILE DISCLOSURE	DESCRIPTION	REPORTED	CROSS-REFERENCE/ DIRECT ANSWER
G4-9	Scale of the organization	Partial	Page 20
G4-10	Total number of employees	Partial	Page 21
G4-11	Percentage of total employees covered by collective bargaining agreements	Partial	Page 22
G4-12	Description of the organization's supply chain	Fully	Page 22
G4-13	Significant changes during the reporting period regarding the organization's size, structure, ownership or supply chain	Fully	Page 22
G4-14	Whether and how the precautionary approach or principle is addressed by the organization	Fully	Page 23
G4-15	List of externally developed economic, environmental and social charters, principles or other initiatives to which the organization subscribes or it endorses	Fully	Page 23
G4-16	List of memberships in associations and national or international advocacy organizations in which the organization is engaged	Fully	Page 23

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 2013 Annual Report and Form 10-K
G4-18	Explaination of the process for defining the report content and aspect boundaries , as well as how the organization has implemented the reporting principles for defining report content	Fully	Page 14
G4-19	List of all the material aspects identified in the process for defining report content	Fully	Page 17
G4-20	Aspect boundary within the organization for each material aspect	Fully	Page 17

PROFILE DISCLOSURE	DESCRIPTION	REPORTED	CROSS-REFERENCE/ DIRECT ANSWER
G4-21	Aspect boundary outside the organization for each material aspect	Fully	Page 17
G4-22	Effect of any restatements of information provided in previous reports and the reasons for such restatements	Fully	Pages 18-19
G4-23	Significant changes from previous reporting periods in the scope and aspect boundaries	Fully	Page 17

Stakeholder Engagement

PROFILE DISCLOSURE	DESCRIPTION	REPORTED	CROSS-REFERENCE/ DIRECT ANSWER
G4-24	List of stakeholder groups engaged by the organization	Fully	Pages 15-16
G4-25	Basis for identification and selection of stakeholders with whom to engage	Fully	Pages 15-16
G4-26	Organization's approach to stakeholder engagement	Fully	Pages 15-16
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 24

Report Profile

PROFILE DISCLOSURE	DESCRIPTION	REPORTED	CROSS-REFERENCE/ DIRECT ANSWER
G4-28	Reporting period	Fully	1 January- 31 December 2013
G4-29	Date of most recent previous reports	Fully	2012
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 with regard to seeking external assurance for the report	Fully	Page 24

Governance

PROFILE DISCLOSURE	DESCRIPTION	REPORTED	CROSS-REFERENCE/ DIRECT ANSWER
G4-34	Governance structure of the organization	Fully	Page 24 and Ecolab's 2013 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 2013 Annual Report and Form 10-K
G4-EC1	Direct economic value generated and distributed	Partial	2013 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 2013 Annual Report, Form 10-K and Ecolab's submission to the CDP
G4-EC3	Coverage of the organization's defined benefit plan obligations	Partial	Ecolab's 2013 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	Not material	Page 26
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 26
G4-EC8	Significant indirect economic impacts	Unable to report	We do not have information available to respond to this disclosure. In 2014, we will take steps to identify opportunities to measure these impacts.
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		Page 29
G4-EN1	Materials used by weight or volume	Fully	Page 31
G4-EN2	Percentage of materials used that are recycled input materials	Fully	Page 31
G4-EN3	Energy consumption within the organization	Fully	Pages 32-33
G4-EN4	Energy consumption outside the organization	Fully	Page 34
G4-EN5	Energy intensity	Fully	Page 35
G4-EN6	Reduction of energy consumption	Fully	Page 35
G4-EN7	Reduction in energy requirements of products and services	Fully	Page 36
G4-EN8	Total water withdrawal by source	Fully	Page 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	Unable to report	Page 40
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	Indirect GHG emissions (Scope 1)	Fully	Page 41
G4-EN17	Other indirect GHG emissions (Scope 3)	Fully	Page 42

G4-EN19 Redu	emissions intensity	Fully	
	ation of CHC amissions		Page 42
G4-EN20 Fmiss	Ction of GHG eniissions	Fully	Page 43
	sions 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 46-48
G4-EN24 Total	number and volume of significant spills	Fully	Page 48
treat of the and p	ht of transported, imported, exported or ed waste deemed hazardous under the terms e Basel Convention Annex I, II, III and VIII, percentage of transported waste shipped nationally	Fully	Page 48
of wa affec	ity, size, protected status and biodiversity value ter bodies and related habitats significantly ted by the organization's discharges of water unoff	Fully	Page 49
	nt of impact mitigation of environmental impacts oducts and services	Fully	2013 Corporate Sustainability Report Summary page 30
	entage of products sold and their packaging rials that are reclaimed	Unable to report	We do not have this information for 2013. In 2014, we will take steps to begin to more accurately capture this information.
of no	etary value of significant fines and total number nmonetary sanctions for noncompliance with onmental laws and regulations	Fully	Page 50
produ orgar	ficant environmental impacts of transporting ucts and other goods and materials for the nization's operations and transporting members e workforce	Fully	Refer to EN 4 and EN 17
· · · · · · · · · · · · · · · · · · ·	environmental protection expenditures and tments	Unable to report	Data not available
	entage of new suppliers screened using onmental criteria	Partial	Page 50

PROFILE DISCLOSURE	DESCRIPTION	REPORTED	CROSS-REFERENCE/ DIRECT ANSWER
G4-EN33	Significant actual and potential negative environmental impacts in the supply chain and actions taken	Unable to report	We do not have this information for 2013. In 2014, we will begin a more strategic process for mapping our suppliers.
G4-EN34	Number of grievances about environmental impacts filed, addressed and resolved through formal grievance mechanisms	Fully	Page 50

Social: Labor Practices and Decent Work

PROFILE DISCLOSURE	DESCRIPTION	REPORTED	CROSS-REFERENCE/ DIRECT ANSWER
G4-LA DMA	Disclosure of management approach		Page 51
G4-LA1	Total number and rates of new hires and employee turnover	Unable to report	Page 52
G4-LA2	Benefits provided to full-time employees that are not provided to temporary or part-time employees	Partial	Page 52
G4-LA3	Return to work and retention rates after parental leave	Partial	Page 52
G4-LA4	Minimum notice periods regarding operational changes	Fully	Page 52
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	Fully	Page 53
G4-LA6	Type of injury and rates of injury, occupational diseases, lost days and absenteeism and total number of work-related fatalities	Partial	Page 53
G4-LA7	Workers with high incidence or high risk of diseases related to their occupations	Fully	Page 53
G4-LA8	Health and safety topics covered in formal agreements with trade unions	Fully	Page 53
G4-LA9	Average hours of training per year per employee	Partial	Page 54

PROFILE DISCLOSURE	DESCRIPTION	REPORTED	CROSS-REFERENCE/ DIRECT ANSWER
G4-LA10	Programs for skills management and lifelong learning that support the continued employability of employees and assist them in managing career endings	Fully	Page 54
G4-LA11	Percentage of employees receiving regular performance and career-development reviews	Fully	Page 55
G4-LA12	Composition of governance bodies	Partial	Page 55
G4-LA13	Ratio of basic salary and remuneration of women to men	Not reported	We do not report on this disclosure because the information is proprietary.
G4-LA14	Percentage of new suppliers screened using labor practices criteria	Partial	Page 56
G4-LA15	Significant actual and potential negative impacts for labor practices in the supply chain and actions taken	Fully	Page 56
G4-LA16	Number of grievances about labor practices filed, addressed and resolved through formal grievance mechanisms	Not reported	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 57
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 57
G4-HR3	Total number of incidents of discrimination	Not reported	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	Partial	Page 58

PROFILE DISCLOSURE	DESCRIPTION	REPORTED	CROSS-REFERENCE/ DIRECT ANSWER
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 58
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 58
G4-HR7	Percentage of security personnel trained in the organization's human-rights policies or procedures that are relevant to operations	Not reported	We do not have information to address this disclosure.
G4-HR8	Total number of incidents of violations involving rights of indigenous peoples and actions taken	Not material	Ecolab does not have operations in regions impacting indigenous peoples.
G4-HR9	Total number and percentage of operations that have been subject to human-rights reviews or impact assessments	Partial (does not include EMEA)	Page 59
G4-HR10	Percentage of new suppliers screened using human- rights criteria	Partial	Page 59
G4-HR11	Significant actual and potential negative human- rights impacts in the supply chain	Fully	Page 59
G4-HR12	Number of grievances about human-rights impacts filed, addressed and resolved through formal grievance mechanisms	Not reported	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 60
G4-S01	Percentage of operations with implemented local community engagement, impact assessments and development programs	Unable to report	We do not have information to address this disclosure.
G4-S02	Operations with significant actual and potential negative impacts on local communities	Fully	Page 61

PROFILE DISCLOSURE	DESCRIPTION	REPORTED	CROSS-REFERENCE/ DIRECT ANSWER
G4-S03	Total number and percentage of operations assessed for risks related to corruption and significant risks identified	Fully	Page 61
G4-S04	Communication and training on anticorruption policies and procedures	Fully	Page 61
G4-S05	Confirmed incidents of corruption and actions taken	Not reported	We do not report on this disclosure because the information may be proprietary and privileged.
G4-S06	Total value of political contributions	Fully	Page 61
G4-S07	Total number of legal actions for anticompetitive behavior, antitrust and monopoly practices and their outcomes	Fully	Page 62
G4-S08	Monetary value of significant fines and total number of nonmonetary sanctions for noncompliance with laws and regulations	Fully	Page 62
G4-S09	Percentage of new suppliers screened using criteria for impacts on society	Partial	Page 62
G4-S010	Significant actual and potential negative impacts on society in the supply chain and actions taken	Fully	Page 62
G4-S011	Number of grievances about impacts on society filed, addressed and resolved through formal grievance mechanisms	Not reported	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		Page 63
G4-PR1	Percentage of significant product and service categories for which health and safety impacts are assessed for improvement	Fully	Page 63
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 63
G4-PR3	Type of product and service information required by the organization's procedures for product and service information and labeling	Fully	Page 64
G4-PR4	Total number of incidents of noncompliance with regulations and voluntary codes concerning product and service information and labeling	Fully	Page 64
G4-PR5	Results of surveys measuring customer satisfaction	Partial	Page 64
G4-PR6	Sale of banned or disputed products	Partial	Page 65
G4-PR7	Total number of incidents of noncompliance with regulations and voluntary codes concerning marketing communications	Fully	Page 65
G4-PR8	Total number of substantiated complaints regarding breaches of customer privacy and losses of customer data	Fully	Page 65
G4-PR9	Monetary value of significant fines for noncompliance with laws and regulations concerning the provision and use of products and services	Fully	Page 65

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 2013 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 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.

Using the Assessment of Significant Business Risks as a foundation, we undertook a rigorous process to analyze risks and opportunities specific to sustainability in 2013. We embarked on a strategic approach to 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 aims 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, provide personally delivered service and on-the-ground support to more than 1 million customers and support business growth. 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:
 - Operation 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 survey categories. Overall, 35,683 employees responded to the survey, achieving a very strong response rate of 83 percent.

Customers

Our relationships with many of the world's biggest brands give us a unique opportunity to understand 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 2013:

- Survey of corporate accounts representatives: Surveyed 500 sales/customer service associates
 representing all Ecolab businesses serving a broad range of customers and industries to assess
 issues material to our customers. More than 150 associates provided detailed responses to the
 survey.
- 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, SPLC, Practice Greenhealth and World Travel and Tourism Council.

Investment Community

As a publicly traded company, we place a priority on the opinions of our stakeholders. 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 strengthen our understanding of global trends impacting our business, customers and communities around the world. In 2013, 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 2013 included the UN Global Compact and CEO Water Mandate, Corporate Eco Forum, World Wildlife Fund, Alliance for Water Stewardship, Corporate Executive Board, the Sustainability Consortium and Corporate Eco Forum.

SUSTAINABILTY 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 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 2013 REPORTING PERIOD (1 JANUARY-31 DECEMBER 2013)

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 the 2013 inventories, we identified several changes that impacted historical inventories resulting in a restating of our 2012 baseline to measure progress against our corporate goals.

The most significant change to historical inventories was the continued effort to integrate Legacy Ecolab and Legacy Nalco operations, along with a new effort to integrate Legacy Champion Technologies operations. This structural change was carried back through 2012 in order to evaluate the combined company's year-on-year performance from 2012 to 2013.

Throughout 2013, continued scope and boundary changes as well as 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 that maintain our energy and water invoices for all owned and operationally controlled fixed facilities. This also serves as a way to perform internal and third-party auditing of this data.

Globally, Ecolab had an 89 percent invoice-compliance rate in 2013, meaning that 89 percent of all energy and water invoices from all owned and operationally controlled fixed facilities were used to compile 2013 data (consistent with our 2012 data-collection rate of 89 percent).

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 (bls.gov/ppi). PPI values are available for specific industries, defined by NAICS code. The PPI for Ecolab is established using the NAICS code of 325998 - All Other Miscellaneous Chemical Product and Preparation Manufacturing. This represents a change in our NAICS code from our prior reporting and goal period of 2006-12 reflecting the evolution of our business scope, products and services.

GREENHOUSE GAS INVENTORY CHANGES

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

- GHG data for 2012 were adjusted to incorporate Ecolab's merger with Champion Technologies, while also including the completed data set for Legacy Nalco.
- 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).
- 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 2013, 1,294 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 (U.S. business travel only) GHG emissions verified by a third party using the ISO 14064-3: Greenhouse Gases – Part 3 specification standard.

WATER, WASTEWATER AND WASTE INVENTORY CHANGES

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

- Water, waste and effluent data from Legacy Champion Technologies was added into the 2012 and 2013 combined company's inventories.
- 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, with our chairman of the board and CEO being ultimately responsible for ensuring appropriate strategy adjustments occur.

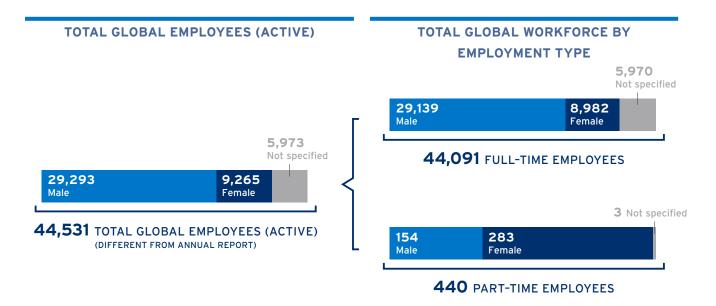
The most significant business risks are reported publicly through the company's annual 10-K filing, and specific business risks and opportunities are disclosed herein. In our 2013 10-K, human-resource issues such as employee attraction and retention are included as potential business risks. The various 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)

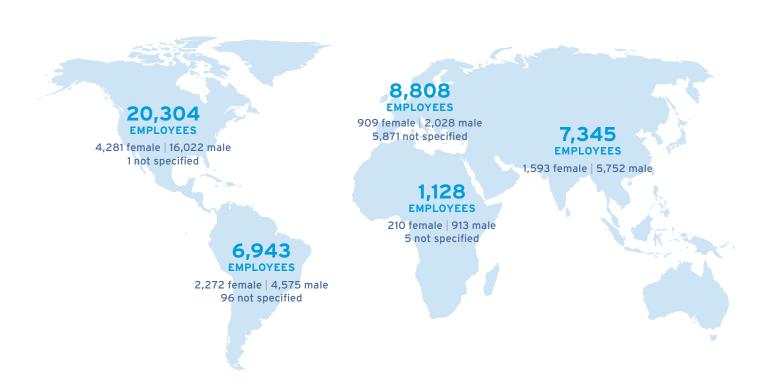
Total headcount, 2013: 45,415.

Revenue, 2013: \$13.3 billion (net sales). Opposite are the sales and revenues by regions that make up 5 percent or more of total revenues.

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 does not include EU employment data received after 31 July 2013.

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, .03 percent of employees are covered by collective-bargaining agreements.

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 171 countries. The company 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.

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 2013, Ecolab made further investments to bolster our product and service offerings and market footprint. Below is a summary of significant 2013 changes:

- In January, we completed the acquisition of Quimiproductos, a Mexico-based producer and supplier of cleaning, sanitizing and water-treatment products and services to breweries and beverage companies. Annual sales in 2012 were approximately \$43 million, and the acquisition was focused on growth in our core product offerings and improved service capabilities in the Latin America region.
- In April, we closed on the acquisition of Champion Technologies, a Houston-based global energy specialty products and services company with 2012 sales for the business acquired of approximately \$1.3 billion, further strengthening our position in the oil-and-gas services market.
- Also in April, Nalco Champion acquired Master Chemicals to significantly expand our energyservices footprint in Russia and the Commonwealth of Independent States (CIS) region.
- In December, we completed the acquisition of AkzoNobel's Purate business, which provides patented, proprietary chlorine dioxide chemistry for use in a wide array of water-treatment applications. With 2012 revenue of approximately \$23 million, the Purate business expands the range of water-treatment solutions we provide.
- In December, Nalco Champion announced plans to construct a new headquarters building in Sugar Land, Texas. The 133,000-square-foot building, scheduled for completion in late 2015, will accommodate approximately 1,000 Nalco Champion associates.
- The project also will include renovation of Nalco Champion's existing 45,000-square-foot Sugar Land office building to expand Research, Development & Engineering lab facilities.

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

In late 2013, Ecolab introduced a broader customer-impact product-profile process that considers use phase impacts of the product and system as used in the customer setting. In 2013, we managed 14 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.

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.
- Carbon Disclosure Project (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.

Other notable associations we support include:

- Global Environmental Management Initiative (GEMI)
- International Organization for Standardization (ISO)
- American Cleaning Institute (ACI)
- Marcellus Shale Coalition

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 2013, Ecolab actively participated on 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, SPLC, Marcellus Shale Coalition, Practice Greenhealth and World Travel and Tourism Council, GFSI, National Association of Manufacturers, American Chemistry Council, United States Council for International Business, 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 2013 Corporate Sustainability Report.

EXTERNAL ASSURANCE (G4-33)

We do not seek external verification of our complete Corporate Sustainability Report. Ecolab has completed third-party verification of its publicly reported 2013 Global Scope 1, 2 and 3 (Business Travel only) Greenhouse Gas Emissions in accordance with the ISO 14064-3 Standard. 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 2013 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, Environment and Sustainability 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.

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. Ensure water and energy are available everywhere.
- Our products and services prevent disease and infection. Keep food supplies safe. Protect 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. Reduce risk and worry. Free 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. Take care in all we do.
- We strive to do what's right, what's fair, what's honest.
- We take action together. In teams. 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.

All Ecolab employees and board members receive Code of Conduct training during their onboarding program and are required to complete an online refresher course on an annual basis. The Code of Conduct is re-signed by employees as part of the annual training process. 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.

G4 SPECIFIC STANDARD DISCLOSURES

ECONOMIC

DISCLOSURE OF MANAGEMENT APPROACH

Refer to Ecolab's 2013 Annual Report and Form 10-K

FINANCIAL ASSISTANCE RECEIVED FROM GOVERNMENT (G4-EC4)

In 2013, Ecolab received nominal monetary support, awards, tax reliefs or subsidies directly from government.

We received tax credits to support our research and development initiatives totaling \$8,733,601* (R&D credits received in 2013 related to 2012 tax returns).

*Does not include Champion R&D data

The Dutch government invested in our paper and water businesses in 2013 totaling 110,000€ toward R&D innovation.

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 material to our company.

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

Globally, 90-95 percent of senior management at significant locations of operation are hired from the local community. 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: North America, Europe, Latin America, 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 2013.

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 <u>ecolab.com</u>) 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. Greater than 90 percent of our purchases are from suppliers within our regions.

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

ENVIRONMENTAL

Throughout 2013, Ecolab continued the process of integrating as one company following our December 2011 merger with Nalco and our April 2013 merger with Champion Technologies. The data reported in this section in most cases represent harmonized company data for calendar year 2012 and 2013, wherever possible. However, in many cases, collecting historical data for each company was not possible, either in scope or by indicator. Subsequent reports will seek to provide year-on-year performance for each indicator reported for the combined company.

In 2013, we adjusted our baseline measurements to reflect the complete integration of Nalco and Champion Technologies.

These achievements are the result of enterprise and facility-level commitment to increasing the efficiency of our operations through actions and investments that result in greater environmental stewardship. For example:

- Our Clearing, III., plant implemented a leak-detection and repair program that resulted in nearly 10 million gallons of water savings. (\$58,000 cost savings)
- Our Garyville, La., plant implemented a latex steam injection process that saved more than 1 million kWh in natural gas, avoiding over 750 tCO₂e in emissions. (\$50,000 cost savings)
- In Ellwood City, Pa., we replaced our south plant boiler's economizer and updated area heaters, resulting in 615,000 kWh/year energy savings and 420 tCO₂e savings. (\$11,500 cost savings)
- Our plant in Kwinana, Australia, enhanced control of its cooling tower with the installation of a pump controlled by the plant's chillers. An air bubbler and a glycol pump were installed to better optimize the plant's cooling system. These upgrades resulted in a 90,000 kWh/year energy savings and 72 tCO₂e savings. (\$15,800 cost savings)

DISCLOSURE OF MANAGEMENT APPROACH

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 enterprisewide commitment to operational efficiency and environmental stewardship. We operate with respect for the environment and promote stewardship of natural resources through customer solutions and our own operations. As our company grows, entering new industries and geographies, minimizing the impact of our own operations is increasingly important.

Goals, Targets and Evaluation

In 2013, Ecolab publicly announced new goals to reduce the company's environmental impact over five years. Using the company's 2012 metrics as an operational baseline, we set a goal to achieve a 5 percent reduction in greenhouse gas (GHG) emissions, a 10 percent reduction in water use and wastewater discharge and a 10 percent reduction in solid waste, measured by intensity per million dollars in sales. These goals build on our historically strong environmental progress.

The goals set in early 2013 were an important step toward integrating our sustainability strategies across the Ecolab, Nalco and Nalco Champion businesses. The 2013 goals served as a meaningful framework against which to benchmark our environmental impact and reduction capacity.

In 2014, we will launch aggressive sustainability targets in line with our 2020 business strategy, setting a long-term path toward significant operational improvements. We're 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/</u>commitment-to-sustainability/people/committed-to-safety-and-health.

We made meaningful progress toward our environmental goals, reducing water use, GHG emissions and effluent discharge across our global operations as a combined company.

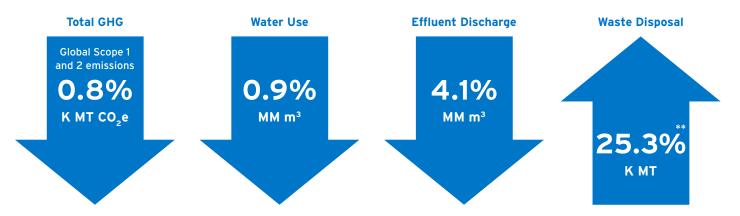
Responsibilities

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 sustainbability 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.

INTENSITY-BASED METRIC (REVENUE)

(measured by intensity per million dollars in sales)

YOY 2012-13 RESULTS*



^{*}Including Champion 2013 data; QA/QC verified but not audited by third party. Baseline adjusted up for merger-included legacy Champion 2012.

^{**}Includes one-time construction and integration activities at three facilities — without these one-time events, waste intensity decreases by 15%.

GHG data is third-party verified.

MATERIALS USED BY WEIGHT OR VOLUME (G4-EN1)

	Units	2012	2013
Raw Material Used (nonrenewable)	Metric Tons (MT)	1,350,256	1,978,122

The scope of this response represents our supply-chain manufacturing sites only. For 2012, this includes Legacy Ecolab manufacturing facilities globally and 30 out of 46 Legacy Nalco global manufacturing facilities where data is available. Legacy Champion is not included in 2012 data due to challenges in collecting prior-year data. The 2013 figures represent the full scope of the combined companies for all supply-chain manufacturing sites.

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

	Units	2012	2013
Total Recycled Input Materials Used in Packaging	МТ	3,569	1,395
Total Packaging Used	МТ	16,555	10,890
Percentage of Recycled Material Used in Packaging		21.6%	12.8%

The scope of recycled packaging data is global Legacy Ecolab and Legacy Nalco for 2012 and global Legacy Nalco for 2013. Legacy Champion is not included in either year's data.

ENERGY CONSUMPTION WITHIN THE ORGANIZATION (G4-EN3)

DIRECT ENERGY CONSUMED BY SOURCE

	Units	2012	2013
Natural Gas	GJ	2,690,636	2,826,044
Residual Fuel Oil	GJ	4,841	3,440
Distillate Fuel Oil	GJ	120,338	117,753
Kerosene	GJ	0	120
LPG	GJ	50,498	50,713
Gasoline	GJ	1,714,981	1,941,256
Diesel	GJ	774,207	932,800
CNG	GJ	1,048	1,110
Biodiesel	GJ	0.023	0.049
Ethanol (E85)	GJ	384	429

INDIRECT ENERGY CONSUMED BY SOURCE

	Units	2012	2013
Electricity	GJ	1,430,693	1,438,783
Steam	GJ	155,386	157,944
Heating Consumption	GJ	38,469	50,991
Cooling Consumption	GJ	2,374	2,684

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

ENERGY GENERATION

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

Our Legacy Nalco Headquarters/RD&E facility in Naperville, III., has an on-site cogeneration facility that produces the majority of electricity used on-site, and sells back any unused electricity that is produced.

ENERGY USE BY REGION

	Units	2012	2013
Asia Pacific	GJ	391,228	462,487
EMEA	GJ	892,673	967,528
Latin America	GJ	199,446	203,533
North America	GJ	5,500,508	5,890,519
Global	GJ	6,983,855	7,524,067

ELECTRICITY USE BY REGION

	Units	2012	2013
Asia Pacific	GJ	179,624	190,621
EMEA	GJ	239,737	245,310
Latin America	GJ	94,871	89,979
North America	GJ	916,461	912,873
Global	GJ	1,430,693	1,438,783

U.S. EPA Climate Leaders conversion factors were used.

ENERGY CONSUMPTION OUTSIDE THE ORGANIZATION (G4-EN4)

SOURCES OF SCOPE 3 EMISSIONS	METRIC TONNES CO ₂ e	METHODOLOY
Fuel-and-Energy- Related Activities (not included in Scope 1 or 2)	199,732	Upstream emissions from electricity and purchased fuels as well as emissions from T&D losses are included 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 by multiplying electricity activity data by emission factors from life-cycle analysis tools for the United States, and on UK Defra 2012 Guidelines for other countries. Upstream emissions from purchased fuels are calculated by multiplying fuel consumption by emission factors from life-cycle analysis tools. Emissions associated with T&D losses were calculated by multiplying the energy use by type by emission factors from EPA's eGRID database for the United States, and from UK Defra 2012 Guidelines for other countries. All GWPs are from the IPCC Second Assessment Report.
Waste Generated in Operations	85,160	This waste figure represents global waste emissions from waste disposed via landfilling and does not include waste from recycling or compost. 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 U.S. and international sites. Emissions from waste are calculated using methodologies and emission factors from the EPA's Waste Reduction Model (WARM), version 11, August 2010. This model bases its emissions calculations on a life-cycle analysis, including emissions from the long-term decomposition of waste in a landfill or from upstream sources/sinks. GWPs are from the IPCC Second Assessment Report.
Business Travel	50,531	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 short-haul, medium-haul and long-haul emission 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.
	335,424	Total

Ecolab has assessed which of its activities cause energy consumption and corresponding GHG emissions outside of its organization, which corresponds to the upstream and downstream categories and activities documented in the WRI and WBCSD GHG Protocol Corporate Value Chain (Scope 3) Accounting and Reporting Standard. We estimate in the case of fuel-and-energy-related activities and waste generated in operations and calculate for business travel the amount of GHG emissions, as it is not possible to directly report energy consumed by type for each category.

For more information about Ecolab's approach to GHG emissions reporting and reduction activities, as well as further details about our Scope 3 footprint, please refer to our CDP submission available at cdp.net.

ENERGY INTENSITY (G4-EN5)

	Units	2012	2013
Energy Intensity (within the organization)	GJ/\$M	553	578

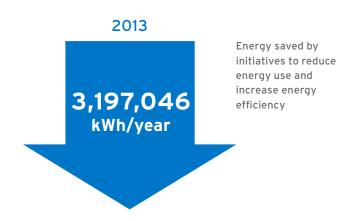
All energy use within the organization is included.

	Units	2012	2013
Ratio Denominator - Global Sales	\$M (adjusted)	12,622	13,020

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
Electricity Use Intensity (within the organization)	GJ/\$M	113	111

REDUCTION OF ENERGY CONSUMPTION (G4-EN6)



Data include reductions in energy use and increases in energy efficiency across Ecolab's global supply-chain operations. Energy savings represent a combination of direct measurement 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. Three examples of our impact in 2013 include:

PARETO Mixing Technology: In 2013, we helped customers save more than 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.

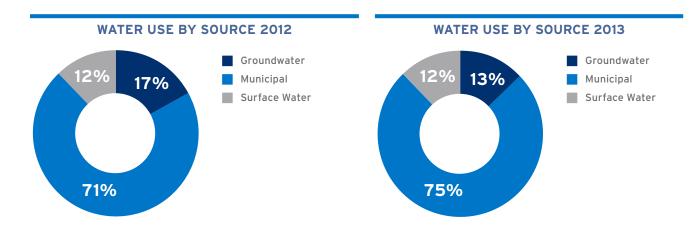
HVAC Performance Services (energy and air [CO₂e]): In 2013, we helped customers in the United States save 157,000 million kWh and avoid 238 million lbs. of CO₂e through our HVAC Performance Services. The goal of this program is to maintain HVAC systems at peak performance. Dirty coils and inefficient 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 2013, we helped customers in the United States save an estimated 134 million kWh through the use of our APEX ware-washing 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 the historic performance of the technology that was replaced in the year the product was launched.

TOTAL WATER WITHDRAWAL BY SOURCE (G4-EN8)



SOURCE OF WATER WITHDRAWAL

	Units	2012	2013
Municipal Water or Other Water Utility	Cubic m	5,117,610	5,319,649
Groundwater	Cubic m	1,207,436	927,501
Surface Water	Cubic m	830,464	871,505

WATER WITHDRAWAL BY REGION

	Units	2012	2013
Asia Pacific	Cubic m	836,848	665,004
EMEA	Cubic m	1,049,857	996,276
Latin America	Cubic m	290,246	294,435
North America	Cubic m	4,978,559	5,162,940
Global	Cubic m	7,155,510	7,118,655
	Units	2012	2013
Water Use Intensity (within the organization)	Cubic m/\$M	567	547

The scope of water-withdrawal source data is global manufacturing and headquarters/RD&E facilities.

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

Ecolab undertakes an annual water-scarcity analysis to identify the regions at risk where the company operates. The analysis includes an assessment of the percentage of operations that are located in regions at risk based on water consumption and considers key factors identified by the WRI Aqueduct tool, WWF-DEG Water Risk tool and the WBCSD Water Tools to identify and characterize its operations across potential water-stressed regions. These tools are used to cross-reference and correlate potential impacts based upon location and the relative water consumption and wastewater discharge that occur at each facility to determine and prioritize management actions. We also consider production volumes and square footage as normalized indicators to evaluate each facility's impact, in addition to water withdrawal and effluent.

From our 123 manufacturing and campus/tech center facilities that we evaluated, which represent 91 percent of our water-withdrawal footprint, we refined the list using the WRI Aqueduct tool to prioritize those sites looking at three primary criteria: an overall water-risk factor, a facility-to-total-water-use intensity of greater than 0.20 percent and a water-withdrawal intensity per tonne of production of greater than 2.30. We established these two internal indicators by quantifying the total water-withdrawal 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 enterprisewide 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.

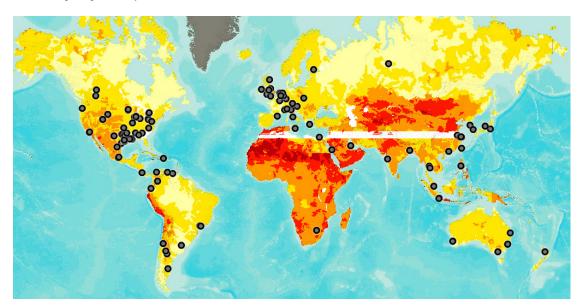
Based on our analysis, while there are facilities that operate in regions with a defined level of water stress, there are only five facilities and corresponding water basins that may be significantly affected by withdrawal of water from Ecolab facilities. This represents 2.5 percent of our total water footprint and 0.9 percent of our production capacity. As such, we believe our risk threshold remains low and is diversified across our global portfolio of production facilities.

WATER SOURCES SIGNIFICANTLY AFFECTED BY WITHDRAWAL OF WATER (CONTINUED)

Country	River Basin (as defined by WRI Aqueduct)	Municipal (m3)	Groundwater (m3)
Saudi Arabia	Undefined	17,058	
Thailand	Undefined	14,832	
China	Undefined	70,539	
Dominican Republic	Undefined	57,786	
India	Ganges		18,372

For each site listed, 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 water sources are designated as protected areas (nationally or internationally).

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)

Although water recycling and reuse are standard practices within our global manufacturing facilities, we currently do not have systems in place to quantify the amount of water recycled or reused in our operations.

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 premise 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 2013, Ecolab completed its third year of a three-year, \$450,000 commitment to World Wildlife Fund (WWF)-US to fund a water stewardship program that identified 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.

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.

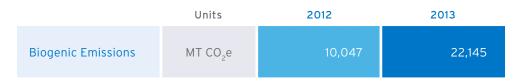
DIRECT GREENHOUSE GAS (GHG) EMISSIONS (SCOPE 1) (G4-EN15)



Scope 1 emissions reported are independent of any GHG trades, such as purchases, sales or transfers of offsets or allowances. The inventory includes $\rm CO_2$, $\rm CH_4$ and $\rm N_2O$ 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).



Biogenic emissions include biodiesel and Ethanol (E85) fuel use. Chosen base year for GHG emissions is 2012. U.S. EPA 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
Gross Indirect (Scope 2) GHG Emissions	MT CO ₂ e	228,299	233,406

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., EPA's eGRID, UK'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
Gross Indirect Business Travel (Scope 3) GHG Emissions	MT CO ₂ e	53,027	50,531

The scope of business-travel emissions is travel by United States-based employees only. Chosen base year for GHG emissions is 2012. Defra 2013 emissions factors were used to calculate Scope 3 business-travel GHG emissions.

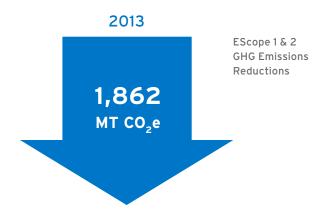
GHG EMISSIONS INTENSITY (G4-EN18)

	Units	2012	2013
Direct and Indirect GHG Emissions Intensity	MT CO ₂ e/\$M	53.0	52.3

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
Direct GHG Emissions Intensity	MT CO ₂ e/\$M	30.7	30.5

REDUCTION OF GHG EMISSIONS (G4-EN19)



The inventory includes ${\rm CO_2}$, ${\rm CH_4}$ and ${\rm N_2O}$ 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 OF OZONE-DEPLETING SUBSTANCES (ODS) (G4-EN20)

	Units	2012	2013
Asia Pacific	MT CFC-11 Equivalents	0.019	0.005
EMEA	MT CFC-11 Equivalents	0	0.024
Latin America	MT CFC-11 Equivalents	0.003	0.003
North America	MT CFC-11 Equivalents	0.622	0.231
Global	MT CFC-11 Equivalents	0.644	0.263

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 is all supply-chain manufacturing facilities. Sites that closed during 2013 are not included in the scope of 2013 data. Substances included in this calculation include 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
Asia Pacific	MT	4.63	4.38
EMEA	MT	16.42	16.81
Latin America	MT	4.69	4.68
North America	MT	225.64	231.33
Global	MT	251.38	257.20

SOX EMISSIONS BY REGION

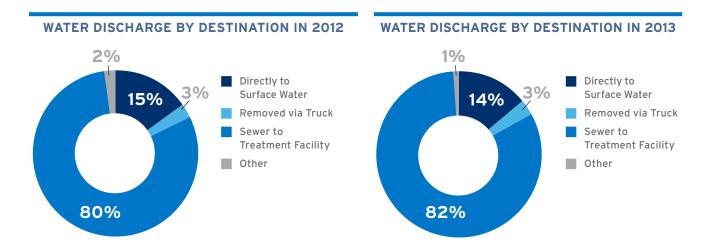
	Units	2012	2013
Asia Pacific	MT	1.01	0.85
EMEA	MT	6.18	5.91
Latin America	МТ	0.36	0.56
North America	MT	323.74	325.19
Global	MT	331.29	332.51

	Units	2012	2013
NOx Emissions Intensity	MT/\$M	0.0199	0.0198
SOx Emissions Intensity	MT/\$M	0.0262	0.0255

99.83 percent and 99.89 percent of global facility fuel use in 2012 and 2013, respectively, are represented in NOx and SOx calculations. Nearly 61 percent (United States only) of global facility electricity use is represented in NOx and SOx calculations for 2012 and 2013. Overall, 53.3 percent and 51.3 percent of global energy use in 2012 and 2013, respectively, are represented in NOx and SOx calculations. Non-U.S. facility electricity use and global fleet fuel use will be added to the NOx and SOx reporting scope in future years.

Emissions factors from the U.S. EPA eGRID for electricity are based on Ecolab facility-specific calculations for fuels.

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



The scope of water withdrawal source data is global manufacturing and headquarters/RD&E facilities.

EFFLUENT BY DESTINATION

		Units	2012	2013
Sewe Treat	r to ment Facility	Cubic m	3,407,150	3,375,105
Direc Surfa	tly to ce Water	Cubic m	641,740	563,096
Remo	oved via Truck	Cubic m	113,282	119,702
	Directly to Groundwater	Cubic m	4,548	4,760
ıer	Over Land	Cubic m	4,224	3,900
Other	Sewer to Groundwater	Cubic m	2,617	29,847
	Sewer to Surface Water	Cubic m	57,809	6,148

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

EFFLUENT BY REGION

	Units	2012	2013
Asia Pacific	Cubic m	288,605	319,445
EMEA	Cubic m	404,716	417,225
Latin America	Cubic m	182,752	177,211
North America	Cubic m	3,355,297	3,188,677
Global	Cubic m	4,231,370	4,102,558
	Units	2012	2013
Effluent Intensity	Cubic m/\$M	335	315

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

	Units	2012	2013
Hazardous Waste	МТ	29,098	28,780
Solid Waste	МТ	37,565	57,365
Recycled Material	МТ	7,247	6,518

The scope of hazardous waste and solid waste is global owned and leased facilities. The scope of recycled material data is global Legacy Ecolab supply-chain manufacturing facilities.

Solid-waste increase is due to one-time activities at three facilities in the United States. If excluded, overall waste intensity decreased by 15 percent.

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

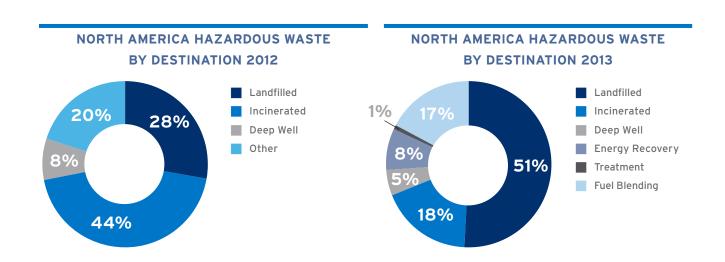
HAZARDOUS WASTE BY REGION

Waste Intensity

	Units	2012	2013
Asia Pacific	MT	2,579	2,533
EMEA	MT	7,117	6,960
Latin America	MT	2,874	2,873
North America	МТ	16,529	16,414
Global	МТ	29,099	28,780
	Units	2012	2013
Hazardous	MT/¢M	2.21	2 21

All waste is disposed of directly by the organization or otherwise directly confirmed.

MT/\$M



2.21

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

NORTH AMERICA HAZARDOUS WASTE BY DISPOSAL METHOD

		Units	2012	2013
Land	filled	MT	2,105	4,208
Incine	erated	МТ	3,225	1,470
Deep	Well	МТ	591	449
	Energy Recovery	МТ	MT 1,470 MT	639
Other	Treatment	МТ		93
	Fuel Blending	МТ		1,356

The scope of North America hazardous waste by destination is North American supply-chain manufacturing sites.

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

In 2013, 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
CONVENTION2 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)

Ecolab undertakes an annual water-scarcity analysis to identify the regions at risk where the company operates. The analysis includes an assessment of the percentage of operations that are located in regions at risk based on water consumption and considers key factors identified by the WRI Aqueduct tool, WWF-DEG Water Risk tool and the WBCSD Water Tools to identify and characterize its operations across potential water-stressed regions. These tools are used to cross-reference and correlate potential impacts based upon location and the relative water consumption and wastewater discharge that occur at each facility to determine and prioritize management actions. We also consider production volumes and square footage as normalized indicators to evaluate each facility's impact, in addition to water withdrawal and effluent.

From our 123 manufacturing and campus/tech center facilities that we evaluated, which represent 91 percent of our water-withdrawal footprint, we refined the list using the WRI Aqueduct tool to prioritize those sites looking at three primary criteria: an overall water-risk factor, a facility-to-total-water-use intensity of greater than 0.20 percent and a water-withdrawal intensity per tonne of production of greater than 2.30. We established these two internal indicators by quantifying the total water-withdrawal 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 enterprisewide 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.

Based on our analysis, while there are facilities that operate in regions with a defined level of water stress, there are only five facilities and corresponding water basins that may be significantly affected by water discharge and runoff from Ecolab facilities. This represents 2.5 percent of our total water footprint and 0.9 percent of our production capacity. As such, we believe our risk threshold remains low and is diversified across our global portfolio of production facilities.

Country	River Basin (as defined by WRI Aqueduct)	Municipal (m3)	Groundwater (m3)
Saudi Arabia	Undefined	17,058	
Thailand	Undefined	14,832	
China	Undefined	70,539	
Dominican Republic	Undefined	57,786	
India	Ganges		18,372

For each site listed, the size of the water source itself, the 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 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 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.

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)

We utilize an Ethical Sourcing Survey to screen our most material suppliers, which we define as suppliers that constitute 30 percent of our annual spend. In addition, the Ethical Sourcing Survey is conducted in conjunction with all supplier audits. 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 our Ethical Sourcing Survey. We plan to expand the reach of those surveyed to other suppliers in the coming years.

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

In 2013, we did not receive materials grievances about environmental impacts.

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, our customers and our customers' 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 No. 1 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/</u>commitment-to-sustainability/people/committed-to-safety-and-health.

Goals, Targets and Evaluation

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.

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.

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)

Over the past two years, we have managed through two significant integrations, Nalco in 2011 and Champion Technologies in 2013. We are in the process of harmonizing systems to be able to accurately calculate enterprisewide attrition rates for the combined company.

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 U.S. 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 U.S. 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 samesex 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 2013. 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.

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 (G4-LA5)

Approximately 52 percent* of Ecolab's workforce was represented in formal joint management-worker health and safety committees that help monitor and advise on occupational health and safety programs. This includes all manufacturing employees, all European-based employees and employees represented across our Safety Champion Networks in the United States.

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

TOTAL RECORDABLE INJURY RATE (TRIR)
(NUMBER OF INJURIES AND ILLNESSES PER 100 WORKERS)

Fatalities	0	
	NA	2.47
	LA	1.12
Injury Rate + Occupational Disease Rate (TRIR)	AP	.80
(TRIR)	EU	1.02
	MEA	.88
Look Day Dates	Legacy Nalco	9.32
Lost-Day Rate:	Legacy Ecolab	40.23

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.

Data does not include Legacy Champion employees.

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.

^{*}Does not include Legacy Champion employees.

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



Weighted average hours of training per FTE based on three Ecolab divisions, representing 26 percent of our global employees.

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 introduced global core leadership competencies that are used as a development tool.
- We have a Talent Council that meets monthly to review all top talent.
- We have corporate flagship development programs that are offered as people make turns in their careers from Leading Self to Leading Others and also from Leading Others. These flagship offerings are aimed at building leaders' capabilities, and we offer an extensive catalog of online training provided by Harvard Business Publishing called Harvard Manage Mentor.
- As a supplement to the corporate offerings, divisions and functions 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 continued 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 who 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, résumé and interview preparation, access to career fairs and job
 postings with other companies.
- Employees and their immediate families continue to have access to the Employee Assistance
 Program through their severance period to address questions and concerns with their
 nonworking life as well as the career transition.

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

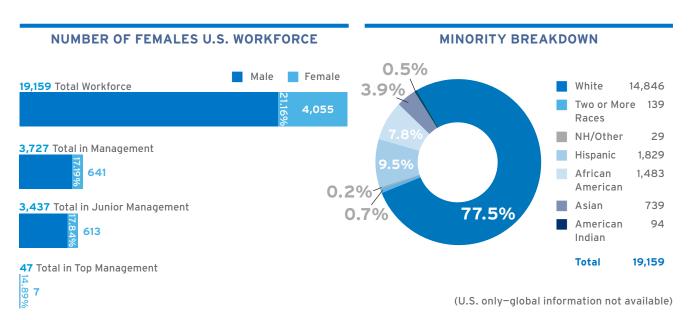
Ecolab is committed to providing an effective performance-planning and development system providing employees and their managers with the tools and processes to help employees optimize their performance. All Performance Planning and Development (PP+D) tools are housed and accessible to all employees 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 2012 performance were conducted in 2013, and 93 percent of Ecolab employees in the United States received an annual review in 2013. Eighty percent of employees in Asia Pacific and 88 percent of employees in Latin America received an annual review in 2013.

COMPOSITION OF GOVERNANCE BODIES (G4-LA12)



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

We utilize an Ethical Sourcing Survey to screen our most material suppliers, which we define as suppliers that constitute 30 percent of our annual spend. In addition, the Ethical Sourcing Survey is conducted in conjunction with all supplier audits. 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 our Ethical Sourcing Survey. We plan to expand the reach of those surveyed to other suppliers in the coming years.

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

We are not aware of any significant actual or potential negative impacts for labor practices in our supply chain.

LABOR IMPROVEMENT PROJECT

Ecolab/Nalco sales representatives are challenged every day to manage their selling and service activities so as to provide a good work-life balance. In 2013, the business division partnered with our corporate enterprise excellence team to investigate ways to minimize the time for sales representatives to reorder product for territory customers through our call centers. The project resulted in development of a reorder "APP" for mobile phones that enabled sales representatives to reorder product in one minute versus the average time of ten minutes (Nalco Direct Online) and 5.5 minutes (phone call).

The business and social impacts were significant:

- In 2012, our WPS division identified "at risk business" amounting to \$785,000, compared to less than \$20,000 in 2013.
- Productivity cost reductions of 40 percent for contract management in 2012 versus 2013.
- Consolidating all contacts to an electronic repository reduced risks.
- Complete contract resolutions went from an average of 45 days to 16 days.
- From January to March 2013 alone, more than 2,500 orders were placed with the mobile APP, which led to greater than 200 hours of sales representative time savings and greater than 500 ship & bill orders placed, valued at \$1.6 million in revenue.

A significant impact that cannot be overlooked is the performance and fulfillment of field representatives by minimizing the amount of delays due to follow-up with the legal teams on both sides of the table. It allowed sales to recognize new revenue sooner and contributed more time to prospecting and service of other customers who had issues.

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

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. Ecolab's commitment to protecting human rights is located on our website. 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 2013, 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 of risk for child labor, including China and India. If we find out that one of our suppliers is using child labor, we would 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. 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 2013, we did not identify any operations or suppliers at significant risk for incidents of forced or compulsory labor. We do have operations in geographic areas considered of risk of forced or compulsory labor, including China and India. If we find out that one of our suppliers is using forced or compulsory labor, we would take the appropriate steps necessary.

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 conformance 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 2013. 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 in 2013. 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 have been 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 and Korea, 100 percent of our employees complete Code of Conduct training and certification.

(Does not include data for EMEA)

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

We utilize an Ethical Sourcing Survey to screen our most material suppliers, which we define as suppliers that constitute 30 percent of our annual spend. In addition, the Ethical Sourcing Survey is conducted in conjunction with all supplier audits. 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 our Ethical Sourcing Survey. We plan to expand the reach of those surveyed to other suppliers in the coming years.

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

In 2013, we did not identify any operations or suppliers with actual or potential negative human-rights impacts.

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.

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)

Approximately 35 local operating units (defined as a daivision within a country) out of several hundred globally were assessed for risks related to corruption. 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 all employees globally. All personnel must complete Code of Conduct training on an annual basis (either online or through classroom-style training for plant employees). All governance body members receive the same mandatory annual Code of Conduct training as our employees, which includes anticorruption policies and procedures.

More detailed anticorruption training has been provided to the senior leaders in all regions – Europe, MEA, 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 2013.

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 2013, Ecolab did not identify any significant noncompliance with laws or regulations. Ecolab did not receive 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, which we define as suppliers that constitute 30 percent of our annual spend. In addition, the Ethical Sourcing Survey is conducted in conjunction with all supplier audits. 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 our Ethical Sourcing Survey. We plan to expand the reach of those surveyed to other suppliers in the coming years.

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

We are not aware of any significant actual or potential negative impacts for labor practices in our supply chain.

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 sell products and services that are safe for customer use and protect the health and safety of their customers, employees and the environment. All Ecolab products are developed using responsible ingredients with careful consideration for the impact our solutions will have on human health, water, air, energy and waste streams, without compromising performance.

Our approach to product responsibility considers the full impact of our offerings, from creation to use to disposal. We follow a rigorous process for new products that includes review of product impacts based on product performance, safety, environmental impact and cost to ensure our products help solve customer challenges safely and sustainably.

Goals, Targets and Evaluation

In 2013, we introduced a broader Customer Impact Product Profile process that considers life-cycle impacts of the product and system as used in the customer setting. Through implementation of this profile, we are furthering our commitment to assessing and communicating important safety, health and environmental information about our products.

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. In addition, we have introduced a broader Customer Impact Product Profile process that considers life-cycle impacts of the product and system as used in the customer setting.

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 six components of each product via the SDS. We provide safe-use instructions for all of our products on the label and/or through our sales and service associates. Globally, Ecolab authors nearly 100,000 SDSs 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 has 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.

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.