



Tax Strategy Statement

The UK tax strategy statement satisfies the statutory obligation under the Finance Act 2016, Schedule 19, Paragraph 19 (2) for all UK affiliates of the Ecolab group. It is effective for the year-ended November 30, 2019.

Global Overview

Ecolab is the global leader in water, hygiene and energy technologies and services that protect people and vital resources. Our company delivers comprehensive solutions to promote safe food, maintain clean environments, optimize water and energy use and improve operational efficiencies for customers in the food, healthcare, energy, hospitality and industrial markets.

Our businesses operate in more than 170 countries and depend on our ability to comply with all laws and regulations globally. The work we do is guided by a commitment to our purpose and values. We manage our global operations with care for the health, safety and prosperity of our employees, customers, communities and the environment, while striving to create long-term value for our shareholders. To meet these goals, Ecolab adheres to the rules and regulations outlined by governments in the countries in which we operate.

Tax Planning

The tax we pay is an integral part of our wider economic and social impact; it plays a key role in the advancement of the countries in which we operate. We act at all times in accordance with the applicable laws and are guided by appropriate international standards. Paying the correct amount of tax at the right time is essential to the overall success of our organization.

The tax strategy of the company has been reviewed to ensure it aligns with our business. We establish entities in jurisdictions suitable for our global business operations, and that support the tax structure of our organization.

We pay tax on our income in those countries where activities take place. Our structures have economic substance and adhere to the arm's-length standard in accordance with the current transfer pricing principles outlined by the Organisation of Economic Co-operation and Development (OECD).

Code of Conduct

At Ecolab, we are committed to making honest, fair and ethical decisions every day. As part of this commitment, all employees worldwide are required to comply with the Code of Conduct. It applies to all employees, directors and officers of Ecolab, as well as any third parties that conduct business on behalf of Ecolab.

Relationship with Her Majesty's Revenue & Customs (HMRC)

The strong relationship that we have cultivated with HMRC is highly valued within Ecolab. We have a mutual respect and a high opinion of HMRC, and Ecolab strives to collaborate with the tax authorities to resolve disputes and achieve mutual agreement.

We are committed to complying with tax laws in a responsible manner and to having an open and constructive relationship with tax authorities.

Risk Management

Ecolab's Board of Directors reviews the company's risk management processes as part of our global internal controls. Ecolab follows a systematic approach to the management of tax risk that involves a process of identification, evaluation, management and reporting of tax risk.

The head of the Tax Function oversees our approach to tax, which is discussed with the Ecolab Audit and Finance committees of the Board of Directors. We recognise that tax legislation can be complex and give rise to uncertainty. We seek to minimize the associated risk through diligent professional standards and consultation with reputable advisors.