

Global Animal Welfare Policy

Purpose

Ecolab is committed to providing effective and sustainable product and service solutions that enable our customers to provide clean water, safe food, abundant energy and healthy environments. A key element to this commitment is fully utilizing alternative methods of safety assessment testing in product development in order to minimize the use of animals in such assessments.

Scope

This policy applies to all Ecolab associates.

Policy

Before launching toxicology tests of any nature associates must apply the following principles:

- Ensure that all relevant safety information already available is collected for each chemical
- Apply data category approaches (grouping, read-across) and Quantitative Structure Activity Relationship (QSAR) assessments, assess well-documented occupational exposure and any relevant clinical data
- Use accepted alternatives to animal testing on a routine basis for tests such as the identification of skin and eye irritation, dermal sensitization or for the detection of mutagenic properties.
- Conduct a robust, weight-of-evidence based judgment as to whether there is enough information to draw a conclusion about the hazards of a chemical substance or product before any additional tests are conducted.

Ecolab furthers these stated principles by contributing to alternative testing initiatives devised to Refine, Reduce and ultimately Replace animal testing in the future (3R principle), and has participated in following programs:

- The Alternatives Testing Steering Committee, an industry consortium working with the U.S. EPA Office of Pesticide Programs
- The U.S. Interagency Coordinating Committee on the Validation of Alternative Methods to validate in vitro assays to classify the irritancy and corrosivity of products
- The European Partnership for Alternative Approaches to Animal Testing (EPAA); an unprecedented voluntary collaboration between the European Commission and trade associations from seven industry sectors

Animal tests may only be conducted when required by law or regulatory agencies, or when hazard characterization is not possible using alternatives and has been pre-approved by the internal Ecolab Animal Welfare Board. Government agencies require these tests to ensure the safety and efficacy of products in the marketplace. In some instances, animal testing is required because the science for non-animal product testing does not currently exist, or regulatory agencies have not yet approved the use of non-animal test methods. If animal tests are not required by law or regulatory agencies, but hazard characterization is not possible using alternatives, associates must receive pre-approval by the internal Ecolab Animal Welfare Board before proceeding.

All required animal testing must be conducted with appropriately accredited contract research organizations. The Ecolab Animal Welfare Board is an internal oversight committee responsible for reviewing cases requiring additional data in which hazard characterization is not possible through

alternative methods. Animal welfare is core to our stated mission of providing cleaner, safer and healthier environments.

Ecolab also applies animal welfare principles to the pest management services offered to many customer segments; including hospitals, hotels, restaurants, food retail businesses, food and beverage manufacturing facilities and other locations where pest-free environments are critical to human health and public safety. These services include on-site education to help customers implement pest prevention practices to reduce conditions which may attract pests to their sites.

Responsibility

All Ecolab associates are responsible for complying with this policy. The internal Ecolab Animal Welfare board reviews proposed tests using animals that are not required by law or regulatory agencies.

Version #	Date	Description	Revised by
Initial Release	April 2016	Initial Release	Tim O'Brien and Walter Aulmann
2	April 2019	Reviewed and minor revisions	Nathan Pechacek/Product Safety & Stewardship/Law & Regulatory Affairs