

France Investigation Procedures

1. The Referent as referred to in the France Whistleblower law is Ecolab's global vendor for Code of Conduct Helpline services.
 - 1.1. The Referent will have a French speaker available, but a whistleblower will have the option to proceed in English.
 - 1.2. The Director of Compliance Europe will oversee the investigation and will utilize French speakers, unless the whistleblower requests to proceed in English.
2. The whistleblower will be informed of receipt of the report "without delay", receive an estimated review time, and be informed as needs arise.
 - 2.1. The whistleblower will receive a case number to verify their report immediately before they complete their initial report call. In addition, the whistleblower will receive a message from Ecolab within the Code of Conduct Helpline system letting them know that the report has been received by Ecolab within 24 hours of the report, except if the report was received on a weekend.
 - 2.1.1. The response from Ecolab will estimate the investigation time based on the complexity of the report.
 - 2.2. At any time, the whistleblower may call into the system to check on the status of the report. Ecolab will post response messages within the system.
 - 2.3. When an investigation closes, Ecolab will post a close message within the system.
3. The identity of a whistleblower, persons concerned, or facts disclosed in France may not be disclosed, except as provided below.
 - 3.1. The identity of a whistleblower, the identity of the person who is subject of the report, and reported facts can only be used for the sole purpose of verifying or processing the report.
 - 3.1.1. Can only be disclosed if it is necessary to properly conduct the investigation
 - 3.1.2. Facts disclosed should be kept to a minimum
 - 3.1.3. The recipients of the confidential information should be limited to only those necessary
 - 3.1.4. Questions raised for the purpose of the investigation should not lead to the identification of the whistleblower or the person who is subject of the report
 - 3.1.5. Identity of whistleblower may be disclosed if the whistleblower gives consent

- 3.1.6. Elements capable of identifying the person who is subject of the report may be disclosed once it is established that the report is substantiated
- 4. Information enabling the identification of the whistleblower or of the persons who are the subject of the report in France must be destructed within:
 - 4.1. Two months from the closure of the issue of admissibility of the report, or
 - 4.2. Two months from the closure of the investigation.

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1	October 2018	Initial Release	Global Compliance Department