

# Code Investigation Process



You are aware of a potential Code of Conduct violation.

**1** You have an obligation to contact one or more of the following to report your concern:



- 1 Your manager
- 2 Your HR Business Partner
- 3 The Code of Conduct Helpline
- 4 Compliance
- 5 The Law Department

**3** Your concern will be centrally logged and managed by the Global Compliance Department.



**2** You will receive an acknowledgment from the Global Compliance Department that your concern has been received.



**4** An internal Ecolab investigator will be assigned (sometimes HR will be asked to assist).



**5** You might be contacted by the investigator if clarification or additional information is needed.



**7** The investigator will review all facts and evidence and summarize the matter for the Chief Compliance Officer (CCO) to approve.



**6** The investigator will coordinate resources and gather facts and evidence. (The investigation will take time depending on the complexity of the issue.)



**8** The CCO will approve the investigations and recommendations, or ask for additional information.



**9** Once approved, the investigation will be closed. A closing message will either be posted in the Helpline System or emailed directly to you. Due to confidentiality, you will not be informed of the investigation details or action taken.

Appropriate action will be taken.

