



## CULLIGAN HOTLINE POLICY

### **COMPLIANCE HELPLINE**

The Compliance Helpline is an easy way for you to anonymously report suspected or actual unethical or illegal business activities involving Culligan. The Helpline is open 24 hours a day, 365 days a year and is staffed by professionals from an outside, independent telephone reporting service with more than 500 corporate clients nationwide. You can call toll-free at **1-800-665-0850 (if calling outside of the U.S., ask your Human Resources representative, or go to the company's intranet, for the correct number to use in your region).**

#### Importance

The Company is committed to conducting business in compliance with all applicable laws and in an ethical manner. The Compliance Helpline is a way for all employees to report actual or potentially unethical or illegal activities. Timely reporting of concerns will allow the Company to meet our ethical and legal commitments.

#### Reporting Violations

The Compliance Helpline is available to all of our employees. If you have information about possible unethical or illegal activities, your first option is to report any suspicions to your supervisor or manager. You may also report your concerns to Human Resources, Legal, or Environmental, Health & Safety Compliance. If you feel uncomfortable with the direct approach, use the Compliance Helpline.

Contact the Compliance Helpline to report actual or suspected violations related to:

- ✓ Anti-boycott Laws
- ✓ Antitrust Laws
- ✓ Conflicts of Interest
- ✓ Copyright, Patent, and Trademark Laws and Software Piracy
- ✓ Criminal Violations
- ✓ Disclosure of Confidential Information
- ✓ Environmental Codes, Laws, Policies, Regulations and Standards
- ✓ Export / Import Laws
- ✓ Fleet Safety / Department of Transportation (DOT) Laws, Policies, Regulations and Standards
- ✓ Foreign Corrupt Practices Act
- ✓ Fraudulent Transactions
- ✓ Harassment / Discrimination
- ✓ Health and Safety Codes, Laws, Policies, Regulations and Standards
- ✓ Improper Lobbying and Political Contributions
- ✓ Insider Trading
- ✓ Retaliation
- ✓ Theft, Bribery and Kickbacks
- ✓ Wage and Hour Laws

Please refer to our Code of Business Conduct for further guidance.

#### Confidentiality

You will not be asked to identify yourself. Your call to the Compliance Helpline is answered by an independent, third-party communications specialist, who will assign your call a unique identification number. You can use this identification number to call back later and check on any concern without identifying yourself. The calls are not recorded or traced.



### Procedure

An interview specialist will answer the call and take the information that you provide. Bilingual interview specialists are available if needed. A written report is then prepared and forwarded to the Company's Legal Department for review and investigation. The investigation will obtain all of the facts necessary to evaluate the reported concern. If the investigation indicates unethical or illegal conduct, the Legal Department will work with the head of Human Resources Department, and other Company management, as applicable, to determine the appropriate response, which could include a change in Company policy or procedure, legal action, or employee discipline.

### Results

Just call the Compliance Helpline in approximately two weeks to inquire about the status of your original call. Tell the interview specialist that you are calling to check on your earlier concern and use the identification number given to you during your first call. The interview specialist will then give you any updates and may ask you additional questions from the Company to assist in the investigation. At no time during the Compliance Helpline process are you required to give your name.

If you have any questions about the Compliance Helpline, please contact the Company's General Counsel.

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