

# GLOBAL GIFTS, TRAVEL, ENTERTAINMENT, AND MEALS POSITION

## Purpose

This position statement sets forth Ecolab's requirements around giving and receiving gifts, travel, entertainment, and meals in accordance with the [Code of Conduct](#).

## Scope

This position statement applies to all Ecolab employees globally.

## Position

Ecolab requires that business decisions be made based on fair and objective criteria and not on an offer or request to improperly influence a business decision.

Any gifts, travel, entertainment, or meals offered or received must meet the following requirements:

- Be given or received for a legitimate business purpose with no intent to improperly influence
- Be reasonable in cost, amount, quantity, and frequency
- Be held at an appropriate venue
- Should not be cash or cash equivalents or personal loans in conjunction with Ecolab business
- Should not violate Ecolab policy or the laws of the United States or the country in which it was provided

Gifts, travel, entertainment, and meals provided to or received from government officials require additional considerations. See [Ecolab's Global Anti-Corruption Policy](#) for details.

## Responsibility

The Global Compliance Department provides oversight. All employees are responsible for complying with this statement as set forth in the Code of Conduct.

## References

- [Code of Conduct](#)
- [Global Anti-Corruption Policy](#)

Version #	Date	Description	Revised By
Initial Release	12/10/2021	Initial Release	Global Compliance Department