

CULLIGAN GROUP SUPPLIER CODE OF CONDUCT

Culligan’s group of companies, which consists of Culligan International Company (“Culligan”), and all legal entities that are subsidiaries of Culligan’s parent company Osmosis Buyer Limited (collectively the “Culligan Group”). Culligan Group’s Supplier Code of Conduct (the “Supplier Code of Conduct”) applies to all suppliers, vendors, contractors, consultants, agents, and other providers of goods and services to members of Culligan’s group of companies (each, a “Supplier”). Conduct is subject to updates from time to time.

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Supplier Expectations

This Supplier Code of Conduct summarizes Culligan Group's required expectations of its Suppliers and reflects Culligan Group's concern for all individuals, including Suppliers' employees. While local customs and laws vary by country, the importance of human rights is a worldwide and universal constant, and this Supplier Code of Conduct is intended to reflect that importance. Culligan Group expects each Supplier to strictly adhere to the following requirements:

Comply with all applicable laws, rules and regulations, including but not limited to those laws, rules and regulations relating to production, employees, and the environment. In addition, Culligan requires its Suppliers to understand and adhere to this Supplier Code of Conduct and take all necessary steps to act in accordance with its provisions.

Supplier shall retain documentation needed to demonstrate compliance with this Supplier Code of Conduct and promptly provide Culligan with access to:

- (i) such documentation at any time upon Culligan's request; and
- (ii) Supplier's facilities for auditing purposes, provided appropriate confidentiality measures are in-place to protect privacy concerns, and provided such access does not materially disrupt Supplier's continued business.

Participate in any and all Culligan Group's Third Party Risk Governance (TPRG) activities where required. This may include but is not limited to;

Supplying evidence such as certificates, audit reports, penetration testing reports, information to assist in TPRG or Data Protection Impact Assessment (DPIA) activities.

Providing remediation plans for any "Critical" issues discovered as part of the TPRG activity.

Partake in Security Non Functional Requirements (SyNFR) audits of provisioned service, providing evidence to demonstrate SyNFR compliance.

Legal & Business Integrity

The Supplier is required to comply with both the letter and spirit of all laws, rules, regulations and regulatory guidance that would be applicable to Culligan Group if Culligan Group were providing the goods and services, including those laws, rules and regulations addressing corruption, kickbacks, bribery and other prohibited business practices.

Compliance with Laws

Supplier shall comply with all applicable laws and regulations relevant to its business, including the implementation, maintenance, and continuous review of compliance in all business processes. In instances where applicable law and this Supplier Code of Conduct address the same topic, Supplier shall meet the most stringent of the overlapping requirements.

Confidentiality

Where information is confidential, Supplier shall use its best efforts to ensure that confidentiality is afforded to such information and only disclosed to employees on a need-to-know basis.

Conflicts of Interest

Supplier is expected to avoid personal activities and financial interests which could conflict with their responsibilities to Culligan Group. Supplier shall not seek gain for itself or others through misuse of its position or company property. Supplier shall have policies and procedures in place that promote fairness in its business dealings.

Corruption/Bribery

Culligan Group does not tolerate bribery or corruption in any form. Supplier and those acting on its behalf, whether directly or indirectly, may not offer, promise, authorize, recommend, give or receive, directly or indirectly, anything of value to any person or entity if it is intended, or could reasonably appear as intended, to influence improper action, obtain or retain business, or secure an improper advantage for Culligan Group. In addition to compliance with the Foreign Corrupt Practices Act (FCPA), the UK Bribery Act, and all other applicable anti-corruption laws, Supplier must have a zero-tolerance policy for corruption, bribery, kickbacks, extortion, and all other similar activities. Supplier and its officers, directors, and employees must adhere to the highest standards of ethical business conduct and must not engage in any form of nefarious activities, whether directly or indirectly through third parties.

Continuous Improvement and Monitoring

Supplier shall consistently practice continuous improvement across all business functions. This includes, but is not limited to, management systems, leadership development, skills development, and root cause analysis. These practices are

implemented to ensure a safe, healthy, and productive environment, available to all employees and representatives.

Culligan Group's Supply Chain function is responsible for management of Supply Chain actions, with assistance from various stakeholders across the business, including but not limited to Culligan Group's Environmental, Social, Governance (ESG) team, Legal, and Internal Audit. Supplier is vetted through Culligan Group's Supplier Scorecard analysis on an annual basis, which consists of environmental, diversity, health and safety, and other topics. Scorecards are reviewed annually with executive management and cross functional stakeholders.

Reporting Breaches

A Supplier found in breach of the Supplier Code of Conduct shall be subject to corrective action plans and more stringent and frequent monitoring. Culligan Group reserves the right to immediately terminate, without liability, a Supplier who refuse to address non-compliance with this Supplier Code of Conduct.

Where Supplier suffers a breach leading to the loss, alteration or otherwise destruction of Culligan Group's data, the Supplier should report this to its nominated Culligan Group representative within one business day of being made aware of the incident. The report should (where possible) indicate the nature of the breach, the type and number of information records affected, actions taken to contain the breach and any outstanding actions to fully recover from the incident with a timeline of when these actions will be completed.

Information and Data Security

Culligan Group expects suppliers to be transparent in the execution of the contract. During service provision, Culligan Group expects suppliers to fully comply with applicable Culligan Group processes and standards in regard to the following;

Confidentiality

Any sensitive information that is shared during the execution of the contract will be protected in line with legal or regulatory requirements. This includes confidential, proprietary, financial, and personal information. Suppliers may be exposed or expected to handle, process, transmit or otherwise communicate confidential information required for an effective partnership, and should be handled inline with at least, Culligan Group processes or standards.

Integrity

Complete, accurate and timely data enables efficient decision making within Culligan, ensuring system and service stability. Where a supplier is made aware of inaccurate data from any indicator, the supplier is responsible for making Culligan Group aware and supplying (where applicable) any corrected information.

Availability

Data shall be made available to allow the effective provision of service. This includes implementing processes to ensure the effective identification of data and data sets, guarantee data retrieval and access and remain usable for the period of the contract. Where a need exists for data to be kept, the supplier is responsible for ensuring effective management of data. This includes the efficient disposal of data when it is no longer required.

Data Use

Culligan Group data shared with suppliers must only be used for the purposes of which it is shared. Any other use of this data is strictly forbidden, unless the owner of the data has authorised its use.

Data Sharing

This code of conduct does not prohibit the sharing of data where either Culligan or its suppliers have a duty to do so, as an example to comply with local law of Government body. As such, we expect our suppliers to comply with relevant data protection legislation. Where any cross border transfer's exist, laws and regulations applicable to the regions across which the transfer is made, will be observed.

Incident reporting

Culligan Group expects its suppliers to report incidents which may or has affected its ability to meet the above statements in a timely and efficient manner, which will assist in

minimising the impact to our customers, employees or Culligan Group. The supplier is responsible for applying robust incident response activities, including the prevention of incidents through the implementation of technical or non-technical controls. The supplier is expected to fully comply with Culligan Group teams in any subsequent investigation of an incident to identify root cause and the implementation of any prevention techniques/controls.

Labor Conditions and Human Rights

Our approach on human rights is informed by the following international standards: the Core Conventions of the International Labour Organization (ILO), the ILO Declaration on Fundamental Principles and Rights at Work, the United National Global Compact and the UN Universal Declaration of Human Rights.

Culligan Group has zero tolerance for exploitation of any kind. As part of implementing our human rights principles, we are committed to ensuring protection of rights of employees, and in particular, we are committed to not directly or indirectly through our supply chains, cause any person to be held in slavery or servitude, employe forced for compulsory labor, tracking labor or child labor.

Child Labor

Child labor is strictly prohibited, and Culligan Group does not tolerate any form of child labor in its supply chain. Supplier shall comply with the minimum employment age defined by applicable law or regulation. Further, Supplier shall not hire any individuals under the age of 15, the local legal minimum working age, or the compulsory schooling age, whichever is higher.

Suppliers are required to have a remediation plan in place to ensure that, in the event of any child labor found, Suppliers must follow international standards, local legal requirements, or Culligan Group's child labor remediation requirements. Culligan Group supports all forms of legal youth employment, including the development of legitimate workplace apprenticeship programs for the educational benefit of young people. Culligan Group will not do business with any Supplier that uses such programs in a fraudulent or deceptive manner. Suppliers must prohibit workers who are under the age of 18 from performing work that is likely to jeopardize their health or safety such as night work, overtime, heavy lifting and working with toxic or hazardous materials.

Zero Tolerance for Human Trafficking

Culligan Group implements the zero tolerance policies adopted by the U.S. and other governments to combat slavery or the trafficking of persons for any purpose. Suppliers are expected to strictly uphold the same principles. Culligan Group strictly prohibits trafficking-related activities.

No Slave Labor and Forced Labor

There will be no tolerance for forced labor. All work must be voluntary, and employees must be free to leave at any time or terminate their employment. Supplier shall not use forced or involuntary labor of any kind, including but not limited to prison labor, slave labor, debt bondage, indentured labor or otherwise.

Modern Slavery and Statement

Culligan Group adopts the definition of slavery is defined as the forced control of people for commercial or personal gain. Culligan Group will not tolerate any forced labor,

including human trafficking, slavery, unwanted labor, or otherwise. All employment must be voluntary based on each individual.

Working Hours in Compliance with Applicable Laws

Supplier's employees shall work in strict compliance with all applicable laws pertaining to the number of hours and days worked. Employees will be provided with reasonable daily and weekly work schedules, and adequate allowances will be made for time off. All Suppliers must comply with legally mandated work hours according to local and international laws.

Fair Compensation

All compensation paid to employees is compliant with applicable wage laws. Compensation includes minimum wages, overtime hours, and legally mandated benefits. Supplier shall pay workers at least the minimum wage required by the applicable local laws and provide all legally mandated benefits, including holidays and leaves and applicable premium rates for overtime. Supplier shall not make any deductions from worker wages as a disciplinary measure.

Diverse Workforce Free from Harassment and Abuse

Culligan Group is dedicated to assembling a supplier base that reflects Culligan Group's culture of inclusion. Accordingly, Supplier shall use its best efforts to create mutually beneficial relationships with diverse suppliers. Supplier shall be committed to creating a workplace free of harassment and shall not subject workers to any form of harsh or inhumane treatment, including sexual harassment, sexual abuse, corporal punishment, mental or physical coercion or verbal abuse. Supplier shall require its leadership and employees to completely, at a minimum, annual anti-harassment training.

Reporting of Violations, Concerns, and Grievances

Supplier shall encourage its employees to report all accidents, incidents, near-misses, non-compliance, or anything posing a risk to health and safety to the appropriate parties. Supplier shall have a reporting mechanism in place that allows employees to submit concerns and violations anonymously, such as an ethics hotline. Supplier shall have a zero tolerance policy for retaliation. Further, if Supplier believes that an employee of Culligan Group has engaged in illegal or otherwise improper conduct, Supplier must immediately report the matter to Culligan Group.

Discrimination EEO/Affirmative Action

Supplier shall not discriminate on the grounds of race, gender, ethnicity, disability, nationality, religion, philosophical belief, political belief, age, sexual orientation, family status, trade union activity or any other status protected by applicable local laws or custom. All employees must be treated with respect and dignity, and any non-compliance with this policy will be treated seriously.

Employees' Rights to Associate and Bargain Collectively

Culligan Group recognizes and respects the right of employees to join and organize associations of their own choosing. Accordingly, Supplier shall respect the right of workers to join and organize associations of their own choosing without fear of retaliation.

Health & Safety

Occupational Safety

Supplier must provide a safe and healthy workplace and implement procedures to prevent accidents and injury in the course of performing work related duties. Supplier must have evacuation procedures, worker training and drills, appropriate first aid supplies, personal protective equipment, fire detection and suppression equipment, as well as clearly marked exits.

Accident Reporting

All on-the-job accidents must be reported, regardless of severity. Timeliness of reporting is enforced in order to begin investigation and promote the likelihood of findings. Reporting accidents also allows for appropriate measures to be taken and for injured employees to return to work as safely as possible.

Hazardous Material Safety

Supplier shall provide a safe environment for employees and outside contractors who work with or around hazardous materials and surrounding areas which may be affected by the presence of such materials. Supplier must post material safety data sheets in the primary language of workers and train workers in the labeling, safe handling, use and storage of any hazardous materials.

Environmental Management

Supplier shall maintain and operate its plants, offices, facilities and processes in accordance with environmental and health and safety laws and regulations of the country in which they reside. No supplier shall cause Culligan Group employees or contractors, nor the employees or contractors of Culligan Group's clients nor those of its group companies to be exposed to unsafe conditions and hazardous products as a result of a Supplier delivering goods or services to Culligan Group. Any hazardous goods or services must be clearly marked and visible and documented handling and protection information must be provided.

Respect for the Environment

Culligan Group is committed to environmental protection and stewardship. Accordingly, Supplier shall comply with all applicable environmental laws and regulations. Supplier shall provide goods and services to Culligan Group in a way that respects the protection of the natural environment. In addition, Supplier shall comply with any and all Culligan Group environmental preservation requirements communicated from time to time.

Energy and Resource Consumption, Pollution Prevention, and Waste Minimization

Supplier shall emphasize the importance of waste minimization, pollution prevention, energy consumption, water consumption, and also look for opportunities to reuse resources. Appropriate energy management shall be performed to reduce the burden on people's health and the environment. Resource conservation will be effectively integrated into Supplier's business decision-making, including but not limited to identifying, monitoring, and measuring water, energy, wastewater, and emissions.

Traceability

At any time upon Culligan Group's reasonable request and notice, Supplier shall disclose the origin of all materials used in the goods and/or services provided to Culligan Group. Supplier recognizes the necessity of traceability, including but not limited to the tracking of batch-lot data, purchase order (PO) data, and other operational information.

Chemistry

Culligan Group ensures compliance with the most stringent global regulations concerning toxic chemicals. All of the products produced for Culligan Group should be tested, including random testing, to ensure compliance with global standards and to ensure all products are made with environmental sustainability and the avoidance of harmful substances. We are working closely with our partners to monitor chemicals such as (but not limited to) toxic air pollutants, PFAs, etc.,. Culligan Group will provide the necessary requirements and training to help Supplier work to be successful in these efforts.

Land rights statement

Supplier shall follow and strictly comply with all applicable laws with respect to local, national, and international human rights standards relating to rights to land and rights to natural resources.

Right to Audit

Culligan Group reserves the right to audit Supplier's internal policies and procedures in order to confirm compliance with this Supplier Code of Conduct..

Maintain Accurate Books and Documentation

Suppliers shall retain documents and records in accordance with applicable law, including accurate, timely, and complete accounts, quality reports, time records, expense reports, and submissions to Culligan Group, regulatory authorities, or others. This also includes documentation necessary to demonstrate compliance with law and this Supplier Code or relevant to any pending litigation, audit, or investigation. Supplier shall cooperate with requests for inspections, audits, and investigations by Culligan or any of its authorized agents relating to compliance with this Supplier Code. Supplier is also expected to cooperate with reasonable requests from Culligan Group or its third-party advisors in connection with evaluating the Supplier's compliance with this Supplier Code, including but not limited to financial books and records, quality, safety, and environmental compliance.

Supplier Diversity Statement

Culligan Group pursues diversity throughout its business operations; Culligan Group is committed to efforts which promote diversity through its hiring and in its interactions with customers and suppliers/subcontractors. Culligan Group recognizes that equal access and equal opportunity, along with diversity in its business processes, is an important part of doing business. As such, Culligan Group's commitment to diversity involves providing diverse-owned businesses including, but not limited to, Minority and Women Business Enterprises (MWBES), Disadvantaged Business Enterprises (DBEs), Veteran Business Enterprises (VBEs) and Lesbian, Gay, Bisexual, Transgender (LGBT) owned businesses, with an opportunity to provide goods and services to our businesses.

Working with diverse-owned companies not only fosters strategic and business relationships, but also stimulates economic development, increases industry competition, and strengthens the Culligan Group communities.

Suppliers shall be expected to provide Culligan Group with reporting on an annual basis regarding Supplier's direct and/or indirect spend. Details contained in the reporting shall include but not be limited to subcontractor's name, services provided, and total dollars spent with any diverse-owned business.