

Corporate Responsibility

Xylem Inc. Supplier Ombudsperson Program

The guiding principle at Xylem Inc. is our Code of Conduct ([Xylem Code of Conduct](#)). The Code of Conduct also applies to our supply base in its dealings with Xylem Inc. We are committed to conducting business according to the highest ethical standards, treating all constituencies with respect, creating fair workplaces, and ensuring that our co-workers help us strengthen and protect our reputation as a great employer, business partner and community member. As such we want our Suppliers to feel comfortable to tell us when they believe we are acting inconsistent with these principles.

To that end and to support our Xylem Inc. Supplier Code of Conduct, we are announcing the Xylem Inc. Supplier Ombudsperson Program, a program made available to our Suppliers to report concerns and issues about Xylem Inc.'s ethical and compliance behavior in its business dealings with Suppliers.

Xylem Inc.'s Supplier Ombudsperson Program employs a 3rd Party Vendor – EthicsPoint – to provide our Suppliers a confidential avenue for raising ethics and compliance related concerns. EthicsPoint representatives will route information provided by Suppliers to the appropriate leadership at Xylem Inc. Access to raised issues is tightly restricted, secure and, again, confidential.

Suppliers can initiate potential issues globally via telephone or online:

- Telephone:
 - Answered 24 hours a day, 7 days a week by live operators in 180+ languages
 - 1-866-886-8605 in the US; 1-503-619-1880 Internationally
- Online:
 - www.Xyleminc.EthicsPoint.com
 - Issues will be sent to the Chief Ethics Officer

Xylem Inc. feels the duty to address code-related concerns. Thank you in advance for your continued commitment to conducting business with Xylem Inc. according to the highest ethical standards. We encourage you to make appropriate use of this feedback tool, should there be an occasion that you believe Xylem Inc. has not acted in the appropriate manner.

Xylem Inc. Supplier Code of Conduct

Xylem Inc. considers collaboration with the supply chain an integral part of its success and therefore strives to operate as an integrated team with Suppliers. The selection of Suppliers is based not only on the quality and competitiveness of their products and services, but also their adherence to social, ethical and environmental principles. Xylem Inc.'s Supplier Code of Conduct helps us to select business partners who follow these principles and business practices that are consistent with our company's values. These requirements are applicable to Suppliers of Xylem Inc. globally. Suppliers are also expected to be familiar with the business practices of their suppliers and subcontractors, and ensure they operate according to this Code of Conduct. Xylem Inc. may discontinue its relationship with Suppliers who fail to comply with this Code.

General Contracting Ethics

Suppliers must use lawful business practices and provide their goods and services in compliance with all applicable laws and contractual obligations. All statements, communications and representations made to Xylem Inc. must be accurate and truthful.

Child Labor

Supplier will not employ child labor, consistent with the principles contained in the International Labour Organization's 1998 Declaration on Fundamental Principles and Rights at Work, in supplying products or services to Xylem Inc. This includes that the Supplier or Supplier's sub-suppliers or contractors will not employ workers under the age of 15, except in those developing countries where there are certain exceptions to this, and a minimum age of 14 years may therefore be applied where the economy and educational facilities are insufficiently developed.

Forced Labor

Supplier must not participate in human trafficking; use forced, involuntary, or slave labor; or purchase materials or services from companies using forced, involuntary, or slave labor. They must be able to certify that materials included in their products comply with the slavery and human trafficking laws of the country or countries in which they do business.

Hiring and Employment Practices

Suppliers' hiring practices must include verification of workers' legal right to work in the country and ensure that all mandatory documents, such as work permits, are available. Xylem Inc. Suppliers are expected to support diversity and equal opportunity in their workplaces. Suppliers must also prohibit discrimination based on race, color, gender, national origin, age, disability, union membership, maternity, sexual orientation, or marital status. Suppliers' workers are free to join associations of their own choosing, and have the freedom of collective bargaining where the local law confers such rights.

Compensation and Working Hours

Suppliers must comply with applicable wage and hour labor laws and regulations governing employee compensation and working hours. Suppliers should conduct operations in ways that limit overtime to a level that ensures a humane and productive work environment.

Health and Safety

Suppliers must provide employees with a safe and healthy working environment and shall ensure compliance with all applicable health and safety laws and regulations. Suppliers should take proactive measures to support prevention of accidents and occupational diseases, such as provide appropriate health and safety training and risk assessment to identify and control health and safety hazards. Procedures for reporting and resolving incidents should be in place. Suppliers shall have health and safety procedures in accordance with applicable elements in OHSAS 18001 or equivalent standard.

Environment

Suppliers shall conduct their operations in a way that ensures compliance with all applicable environmental laws and regulations and that minimizes environmental pollution, promotes an efficient use of natural resources and protects the environment (including design, manufacturing and end of life for products). The Supplier must ensure compliance with product-related requirements and may be required to declare the material content and origin of products delivered to Xylem. Suppliers shall have environmental procedures in accordance with applicable elements in ISO14001 or equivalent standard.

Conflict Minerals and Chemical Substances

The Supplier must ensure compliance with product-related requirements, such as REACH, RoHS or Conflict Minerals, and may be required to declare the material content and origin of products delivered to Xylem Inc.

Improper Payments

Bribes, kickbacks, and similar payments are strictly prohibited. This ban applies even when local laws may permit such activity. Employees, Suppliers, and agents acting on behalf of Xylem Inc. are strictly prohibited from offering or accepting such considerations under any circumstances.

Confidential Information

Suppliers must protect all Xylem Inc. information, electronic data, and intellectual property or Xylem Inc. technologies with appropriate safeguards. Any transfer of confidential information must be executed in a way that secures and protects the intellectual property rights of Xylem Inc. and its Suppliers. Suppliers may receive our confidential information only as authorized by a confidentiality or non-disclosure agreement and must comply with their obligations to not disclose the confidential information, to not use the information except as permitted by the agreement, and to protect the information from misuse or unauthorized disclosure. Our Suppliers can expect Xylem Inc. to similarly safeguard their confidential information when authorization is provided to Xylem Inc. Suppliers may not use the Xylem Inc. trademark, images, or other materials to which Xylem Inc. owns the copyright, unless explicitly authorized.

Supply Chain Transparency

Supply chain transparency is required to confirm compliance to this Code of Conduct. To monitor this, Xylem Inc. may request documentation, conduct onsite audits, review and approve corrective action plans, and verify implementation of corrective action.

Compliance Monitoring

The Supplier will allow Xylem Inc. and/or any of its representatives or agents access to its facilities and all relevant records associated with the products and services provided to Xylem

Inc. The Supplier and Xylem Inc. will establish a mutually agreeable date and time for access. However, risks to Xylem Inc.'s business may require immediate access to the products, services and associated records, and Supplier will accommodate Xylem Inc.'s access as required.

Supplier Diversity

Xylem Inc. appreciates the global and increasingly diverse business arena and acknowledges that we must reflect that environment in our customers, business practices, and most notably, our Suppliers. Xylem Inc. also expects its Suppliers to exercise diversity in their daily business when it comes to their employees as well as in their decisions to select their suppliers and subcontractors.

Harassment

Suppliers must treat all workers with respect and dignity. They may not subject workers to corporal punishment, physical, sexual, psychological, or verbal harassment or abuse. In addition, Suppliers must provide an environment that allows employees to raise concerns without fear of retaliation. Where it is allowed by law, Suppliers should have a system that allows employees to anonymously report their concerns.

Communication

Suppliers are expected to assist Xylem Inc. in enforcing this Supplier Code of Conduct by communicating its principles to their supervisors, employees, subcontractors and suppliers.

Human Rights

As a partner to Xylem Inc. you must respect human rights and not willingly or knowingly assist in any violation of human rights, nor benefit from human rights abuses committed by another party, nor remain silent when human rights violations are being committed.

Xylem Inc. Code of Conduct

Suppliers can find the latest edition of the Xylem Inc. Code of Conduct here:

[Xylem Code of Conduct](#)