

# Employee Concern Policy

<b>Policy</b>	<b>Divisions</b>	All WT Global
	<b>Location(s)</b>	All Locations
	<b>Old Document Number</b>	n/a

	Name	Title
<b>Governance Owner</b>	Vince Grieco	SVP – General Counsel & Secretary
<b>Department</b>	Legal	
<b>Sub-Department</b>	Compliance	
<b>Related Business Manager</b>	Laurie Klann	Ethics & Compliance Manager
<b>Related Business Manager</b>	n/a	n/a
<b>Related Business Manager</b>	n/a	n/a

<b>Impacted Areas</b> N/A
<b>Special Notes/Instructions</b> N/A

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**1 Policy Statement**

Evoqua Water Technologies (“the Company”) is committed to conducting business in an ethical and legal manner. This is underlined by the principle that no profit is ever worth compromising employee safety or the Company’s integrity.

**2 Purpose**

The purpose of this document is to (1) encourage employees to raise concerns internally for investigation and resolution (2) provide avenues for employees to raise concerns (3) reassure employees that they will be protected from retaliation

**3 Scope**

This Policy applies to all employees at all locations.

**4 Conformance**

Non-compliance with this policy may result in appropriate disciplinary action, up to and including.

**5 Exceptions**

There are no exceptions to this policy.

**6 Roles and responsibilities**

**6.1 Compliance**

- Policy implementation, updates and enforcement
- Policy communication and training
- Investigation of employee concerns

**6.2 Human Resources**

- Policy enforcement and enactment of corrective action when applicable
- Investigation of employee concerns

**6.3 Legal**

- Investigation of employee concerns

**7 Consultation with subject matter experts**

Name	Title / Department
Vince Grieco	SVP – General Counsel & Secretary
Anthony Webster	SVP & Chief Human Resources Officer
Jessica Beckett-McWalter	Senior Counsel
Joe Dimenno	Senior Counsel – Litigation
Scott Uziel	Director of Internal Audit
Laurie Klann	Ethics & Compliance Manager
Linda Aubry	HR
Pepper Hamilton	Outside Counsel

**8 Glossary of terms**

Term	Definition
Good Faith Reporting	Reporting a concern that the employee believes to be true and providing all of the information an employee has in his or her possession.

## 9 Requirements

### 9.1 Reporting Concerns and Zero Tolerance for Retaliation

- 9.1.1 Employees who are unsure about what to do during the course of conducting business for the Company, should not simply guess and move forward. Employees must take time to seek guidance. Just because something is legal does not necessarily mean it is ethical or in the best interests of the employee or the Company. If something does not feel right, it probably isn't. Remember, when in doubt, ask before acting.
- 9.1.2 If an employee becomes aware of a possible violation of the Business Conduct Guidelines or any other applicable law or Company policy, the employee has a duty to report it. All employees must fully cooperate with the Company and its agents in the investigation of any suspected violations of Company Policy, regulation, or law. This includes, but is not limited to, attending all meetings with investigators when requested, answering any and all questions posed by Company investigators, providing all relevant information to Company investigators, including volunteering information, and supplying all relevant documents, even when those documents have not been specifically requested by the Company.
- 9.1.3 To ask questions about a situation or to report a suspected violation or other concern, employees have the following options:
- Discuss the matter with your direct Manager or Supervisor
  - Raise the matter with your departmental, segment or divisional leadership
  - Contact Ethics & Compliance
  - Contact your Human Resources Representative
  - Call the Compliance Helpline or submit the matter via the Compliance Helpline website
    - Compliance Helpline phone numbers by country are listed on posters located at each facility and online via the [Compliance Helpline website](#)
- 9.1.4 The Company's Compliance Helpline is staffed by a third party and is available 24 hours a day, seven days a week. Reports to the Compliance Helpline may be made anonymously, although maintaining anonymity may limit the Company's ability to investigate. Employees are encouraged to identify themselves if they are comfortable doing so. Employee concerns will be taken seriously and the Company commits that it will investigate and react to every report.
- 9.1.5 Employees should feel free to report any suspected violation of Company policy or other law without fear of their employment being adversely affected.

The Company strictly prohibits acts of retaliation against any person for reporting a possible violation in good faith. Good faith does not mean the employee has to be right, but it does mean that the employee is providing all of the information he or she has and believes it to be true.

The Company will not tolerate retaliation of any type against someone who reports a suspected violation or other concern in good faith. Any employee who engages in retaliation of any kind will be subject to discipline, up to and including termination.

In addition, pursuant to the 2016 Defend Trade Secrets Act (DTSA), no individual will be held criminally or civilly liable under Federal or State trade secret law for disclosure of a trade secret (as defined in the Economic Espionage Act) that is: (a) made in confidence to a Federal, State or local government official, either directly or indirectly, or to an attorney, and made solely for the purpose of reporting or investigating a suspected violation of law; or, (b) made in a complaint or other document filed in a lawsuit or other proceeding, if such filing is made under seal so that it is not made public. And, an individual who pursues a lawsuit for retaliation for reporting a suspected violation of the law may

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disclose the trade secret to the attorney of the individual and use the trade secret information in the court proceeding, if the individual files any document containing the trade secret under seal, and does not disclose the trade secret, except as permitted by court order.

9.1.6 At their discretion, the Legal Department and the Ethics and Compliance Department will provide reports of inquiries made to the Compliance Helpline to the Board of Directors or its Audit Committee. The Board or Audit Committee may direct the departments to conduct an investigation of a particular allegation or may oversee such an investigation.

9.1.7 Some examples of retaliation include but are not limited to:

- Purposeful, unfounded exclusion from decisions and work activity by supervisors or management
- Purposeful exclusion from training and professional advancement opportunities
- Unjustified negative evaluations and references
- Increased surveillance

## 10 References

<a href="#">GM0001</a>	Business Conduct Guidelines
	Anti-Corruption Policy

## 11 Version History

Version	Date	Description of Change	Author	Approver
1.00	5/9/2016	Initial release	L. Klann	V. Grieco
2.00	6/20/2016	Added language to comply with the DTSA	L. Klann	V. Grieco