



Our Code of Conduct

OUR VALUES ADVANCE OUR VISION

SOLVING WATER TOGETHER

A MESSAGE FROM

Matthew Pine

Colleagues,

At Xylem, our innovative solutions and products deliver on our mission to solve the world's toughest water challenges. But our systems and services are nothing without the value-oriented and ethically-driven team of committed colleagues that stands behind them.

Every day, we are all responsible for transacting business with integrity. I encourage you to use our Code of Conduct as your go-to guide for acting ethically, legally, and respectfully while accomplishing our shared goals with colleagues, customers, and partners. As we work to advance the smart and efficient use of water and to ensure our continued success, our Code unites us under common ethical principles. Together, we shape our business practices through actions defined by our core values of respect, responsibility, integrity, and creativity. And because we expect our business partners to mirror our ethical standards, we will make a positive impact wherever we conduct business.

Our Code helps us make decisions that create a workplace where everyone feels valued and free to bring their authentic selves and ideas. It demonstrates our commitment to sustainability and strengthens our reputation of trust and our sense of purpose. Our Code applies to all of our colleagues and partners. If you are ever unsure about how to respond to an issue or have questions about whether the Code is being followed, do not stay quiet; Speak Up! You have my commitment that we are here to listen and help.

Our excellent reputation as a trusted and respected leader to transform the future of water relies on your continued commitment to integrity. With the Code of Conduct as our guide, we can continue to solve global water challenges, create environmental and social value for our customers and enhance the communities where we live and work.



Matthew Pine

Chief Executive Officer



OUR BOLD VISION

At Xylem, we are committed to creating a world in which water issues are no longer a barrier to human health, prosperity and sustainable development.

Our shared commitment to achieving this vision defines who we are and what we do. Our sustainable success will be measured by our ability to create enduring, meaningful value for:



Our Colleagues

Our people play a vital role in serving customers and driving innovation. We are committed to attracting and retaining the best, most diverse talent by making Xylem a great place to work; encouraging career development and growth; cultivating an inclusive, purpose-driven culture and rewarding success.



Our Communities

Access to clean water and reliable sanitation is vital to human health, communities' resilience and economic growth. We are committed to helping our customers serve their communities' needs and more broadly to helping communities become more sustainable by providing humanitarian aid to those in urgent need, raising awareness of global water issues and responding to disasters.



Our Customers and Partners

We continue to build our powerful global platform of innovative solutions that deliver water, energy and cost savings to help our customers and partners solve their most urgent water challenges. We focus on anticipating our customers' and partners' needs, making it easy to do business with us.

OUR VALUES

Our values define who we are and how we conduct ourselves each day, and ground how we will accomplish our vision:



Respect for each other, for diversity of people and opinions, for the environment



Responsibility for our words and actions, for customer satisfaction, for giving back to our communities



Integrity for acting ethically, for doing what we say we will do, for having the courage to communicate with candor



Creativity for thinking beyond boundaries, for anticipating tomorrow's challenges, for unlocking growth potential

Our Commitment to Sustainability

At Xylem, sustainability is fundamental to who we are and the work we do.

We define sustainability broadly, as responsible practices that strengthen the environment, global economy and society, creating a safer and more equitable world for all global citizens. Our objective to create a more water-secure and equitable world for all has sustainability and social value creation at its core. This is why we are committed to integrating sustainability into every aspect of how we operate and the goals we set for the future.

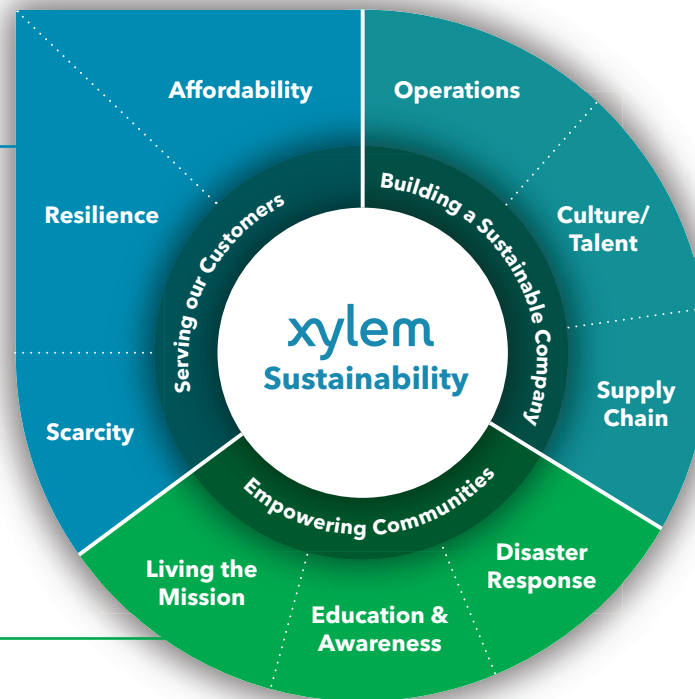
We are helping to build a healthier and more water-secure world while creating social and economic value through:

SERVING OUR CUSTOMERS.

We provide innovative technologies, solutions and expertise that help our customers solve major water challenges. We are harnessing the power of data and analytics to transform water management and deliver powerful water, energy and cost-savings for our customers and the communities they serve.

EMPOWERING COMMUNITIES.

We create social value by providing water-related disaster relief expertise, technology and equipment to communities in need; by educating and raising awareness about water challenges, and inspiring the next generation of water stewards; and by tapping into the passion of our colleagues and stakeholder volunteers to give time to local water-related causes.



BUILDING A SUSTAINABLE COMPANY.

We operate our business with integrity, minimizing our environmental footprint, ensuring the safety of our people and quality of our products, promoting an inclusive and diverse culture, and partnering with suppliers and organizations that share our values.

Learn more about our Sustainability Strategy and read our Sustainability Report at [our website](#).

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OUR CODE, OUR RESPONSIBILITIES

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WHY WE HAVE A CODE OF CONDUCT

Our Code of Conduct unites us as one company under the same ethical principles. It guides how we should act everywhere, every day as we work together to advance our mission of creating a more water-secure and equitable world.

At Xylem, we have always aspired to do well by doing good. Our shared commitment to integrity and ethics makes our company stronger and more sustainable. When we are all aligned around core values, we create the culture and capabilities to deliver unique economic, social and environmental impact.

Our Code of Conduct is a tool that helps us apply our values every day. It defines our responsibilities and sets out expectations for our behavior. While our Code of Conduct cannot address every situation we may encounter, it provides a framework and additional resources for ethical decision making.

The Code of Conduct is designed for everyone, and everyone at Xylem must follow it. Whether you are a member of our Board of Directors, an executive officer or a colleague on the factory floor, the Code applies to you. It applies everywhere we do business, in all work-related situations and whenever you represent the company, including Watermark-sponsored activities.

We also expect any business partner we work with or who represents us to uphold the same standards we do and to follow the spirit of our Code of Conduct.

We are all responsible for conducting business ethically and in line with Xylem's values.

No matter what job you do, you represent Xylem and you play a role in advancing our shared mission. We accomplish this together by always operating with the utmost integrity. Upholding this responsibility means we must all:

- Demonstrate our values through words and actions.
- Support our colleagues in ethical decision making (doing the right thing).
- Know and follow our Code of Conduct, company policies and procedures.
- Complete all assigned ethics and compliance trainings.
- Comply with federal, state, provincial and local laws and regulations that apply to our business.
- Speak up when we have questions or concerns that someone is not following our Code of Conduct.

Laws and regulations can be complex, are subject to change and can vary from country to country. Company policies may also be subject to change and may vary depending on location. Each of us should be familiar with the policies, laws and regulations that apply to our particular job functions. We are all expected to comply with the laws in the countries where we do business. If the expectations are ever unclear, the Code of Conduct outlines the resources where you can ask for help.



Responsibilities of Managers

Managers have an even greater responsibility to lead by example and model good ethical decision making. They are accountable for setting the right ethical tone with their teams. Managers are also responsible for fostering a positive, inclusive, team-oriented environment that allows our colleagues to achieve their full potential.

Managers should always:

- **Model** integrity and ethical decision making and ensure that personal actions set an appropriate example of our values.
- **Create** a work environment that welcomes open communication, allows everyone to have a voice and encourages colleagues to raise concerns.
- **Communicate** ethics and compliance expectations to their team members.
- **Hold** team members accountable for completing all ethics and compliance certification and training requirements.
- **Ensure** that team members know and understand the policies, procedures and laws that apply to their work.
- **Respect** the confidentiality of colleagues who raise concerns or participate in investigations to the greatest extent practical and legally permissible.
- **Strictly avoid** and never tolerate acts of retaliation against people who report concerns.



What If...

What if someone wants to speak with me about a potential Code of Conduct violation?

Make time to speak with your colleague and listen without judgment. If you believe that there is a potential Code of Conduct violation, share the information with Ethics and Compliance by filing a report through the Xylem Integrity Line. See [How to Receive a Concern](#) for additional information on what to do in this situation.

Active Listening

Managers at Xylem play an important role in creating the inclusive environment where our colleagues are free to develop, grow and be their authentic selves. Our leaders do this by listening, being open-minded and having frequent and open dialogue with their team members.

How can I promote diversity and inclusion?

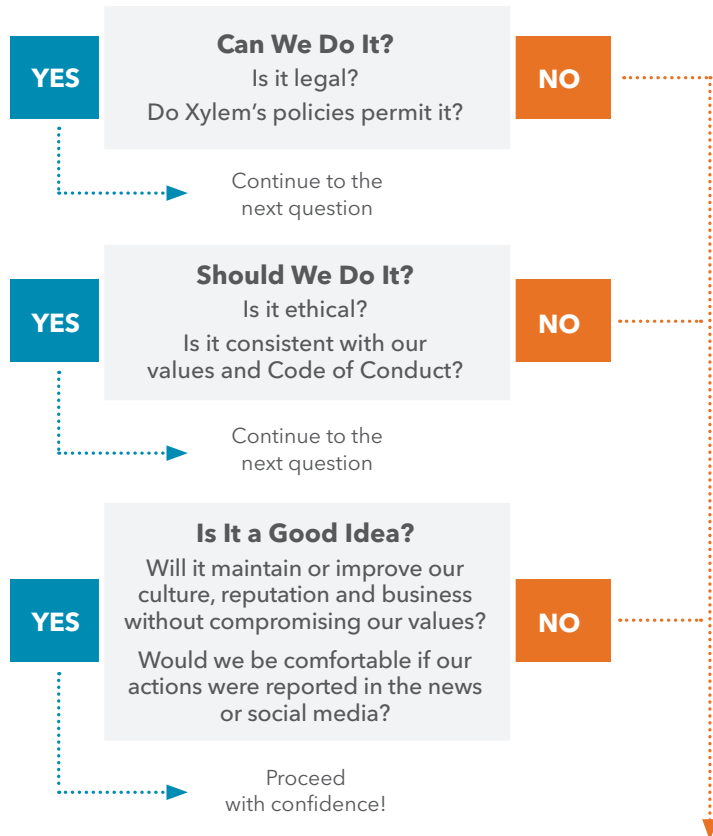
- **Value** all colleagues for the variety of perspectives they bring.
- **Build** teams with diversity in mind.
- **Be intentional** about amplifying the voice of different colleagues.
- **Share** information and seek input from all team members.
- **Search** actively for different points of view to find solutions.
- **Listen** to others with courtesy and respect.
- **Speak up** if you feel that your views or others' views are being disrespected.

See [Respect in the Workplace](#) for more information.

RESPONSIBLE DECISION MAKING

We take pride in our work and the choices we make for Xylem. When we encounter challenging situations, we carefully evaluate the options and seek help when necessary.

It is easy to say “do the right thing,” but sometimes the right thing to do is not obvious. When you encounter a situation where the right thing to do is not clear, the following questions can help you make the appropriate choice.



If the answer to any of the questions is no, stop. Do not pursue the action, and seek guidance from a trusted resource, such as your manager, your HR business partner or someone from Legal or Finance to figure out how to proceed.



It is always okay to ask your manager for help when trying to figure out the right thing to do. Other resources are available and can always be consulted when working through these questions. (See [Asking Questions and Raising Concerns.](#))

Asking Questions and Raising Concerns

Doing the right thing means speaking up. If something seems wrong, there are a variety of resources you can use to share your concern.

Raising concerns strengthens our company by allowing us to respond to problems when they arise. It may not always feel like it, but speaking up about your concerns is the right thing to do. This is why all colleagues are encouraged and expected to speak up if they have questions or concerns about the Code of Conduct, how it applies or whether it is being followed. This also applies to possible violations of laws or company policies.

There are many ways to speak up. You should use the one that is most comfortable for you.

If you see something, we want you to say something using one of these resources:



**Manager or Another
Trusted Leader**



Trusted HR Business Partner



Member of Legal or Finance



**Xylem Integrity
Ambassador**



Xylem Integrity Line

Phone: (1) 605.275.8765 or
(1) 888.995.9870

integrity.xylem.com

For local access numbers,
integrity.xylem.com



**Xylem Chief Ethics and
Compliance Officer**

Phone: (1) 914.323.5991

Email: chief.ethicsofficer@xylem.com



**Xylem Vice President,
Internal Audit**

Phone: (1) 914.323.5705

Email: internal.audit@xylem.com



**Chair of the Audit Committee
of the Board of Directors**

c/o Xylem Corporate Secretary;
Xylem Inc., 1 International Drive,
Rye Brook, New York, USA.

The Xylem Integrity Line

You may report a concern at any time through the [Xylem Integrity Line](#). The Xylem Integrity Line is a tool that allows our colleagues and third parties to confidentially raise concerns or ask questions about conduct that appears to violate our Code of Conduct, policies or the law. The Xylem Integrity Line is operated by an outside vendor and is a completely separate entity from Xylem. Once a report is submitted, the details are transmitted to [Xylem Ethics and Compliance](#).

Refer to the Xylem Integrity Line [Reporting Concerns](#) presentation for help.

Integrity Ambassadors

Our integrity ambassadors network acts as a local ethics and compliance resource for our colleagues. Integrity Ambassadors are trusted colleagues who are available to confidentially receive concerns and promote ethical decision making.

See the [list of integrity ambassadors](#) and languages they speak.

Your Concern Is Our Concern

When concerns are raised, they will be taken seriously, investigated accordingly and responded to appropriately. When reporting a concern, you do not need to have all the facts about the suspected misconduct. Explain what you know and why you believe it is a problem. Having a good faith belief that misconduct has occurred is enough.

If an investigation is needed, it will be conducted on a confidential basis. Anyone who participates in an investigation has an obligation to respect that confidentiality. This means that you should not discuss internal investigations with your colleagues unless given permission to do so. If you are asked to participate in an investigation, you have a duty to cooperate and to provide thorough and honest information. Anyone who does not cooperate, interferes with an investigation, withholds information or otherwise chooses not to comply with these guidelines will be subject to appropriate discipline, up to and including termination.

In Good Faith

Reports of possible misconduct should always be made in good faith. *Good faith* means making a genuine attempt to provide honest, complete and accurate information with the intention of halting the potential misconduct.



Where can I get more information?

- [Ethics and Compliance Program, Reporting Concerns and Non-Retaliation Policy](#)

Anonymity and Confidentiality

When raising a concern, you are always encouraged to identify yourself. Providing your name allows for communication and makes it easier to successfully resolve the situation. If you do choose to identify yourself, we will make every reasonable effort to keep the report and your identity confidential. In most countries, if you prefer to raise a concern anonymously, you have that option as well. We will respect any request for anonymity and will not try to learn your identity.

Following Our Code of Conduct

We expect everyone to be familiar with and follow the Code of Conduct. Violations of our Code, our policies or the laws associated with our Code of Conduct and policies are taken seriously and may lead to disciplinary action, up to and including termination. In certain circumstances, violations of the Code of Conduct may result in civil or criminal consequences for Xylem and the individuals involved.

Zero Tolerance for Retaliation

We know it takes courage to come forward about suspected misconduct. That is why we do not tolerate retaliation of any kind, and colleagues who raise concerns in good faith will not suffer retaliation. If you suspect that you or a colleague has experienced retaliation as the result of raising a concern in good faith or participating in an investigation, report it through one of the channels for speaking up. (See [Asking Questions and Raising Concerns](#).) We will investigate the matter and take corrective action. Anyone found to have engaged in retaliation will be subject to disciplinary action, up to and including termination.



What If...

What if I believe that someone is violating our Code of Conduct?

Raise your concern through the reporting channel that you are most comfortable with. Speaking up about a potential problem allows us to address the concern and resolve it.

What if I feel I am being retaliated against?

Raise the concern through one of the reporting channels. (See [Asking Questions and Raising Concerns](#).) Retaliation can occur in the form of adverse employment actions as well as more minor actions such as exclusion from meetings or redelegation of responsibilities. Xylem has a zero-tolerance policy for retaliation against colleagues for raising concerns. Retaliation against colleagues for speaking up will result in discipline, up to and including termination.

How to Receive a Concern

In most cases, colleagues who observe misconduct will first go to a trusted leader, such as their manager, HR business partner or integrity ambassador. If a colleague comes to you to raise a concern about possible misconduct:

- Ensure you have enough time to discuss the concern adequately.
- If appropriate, conduct the meeting in a private location.
- Listen carefully and without judgment.
- Do not feel that you must respond to the concern or have a solution.
- Thank colleagues who raise concerns and advise them that you will follow up with the right person or group.
- Report the matter to Ethics and Compliance by filing a report through the [Xylem Integrity Line](#).

Managers should not attempt to investigate reports of suspected Code of Conduct violations unless asked to do so by Ethics and Compliance.



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RESPECT IN THE WORKPLACE

We strive to create a workplace where everyone feels involved, respected, valued and free to bring their authentic selves and ideas to work every day. We hold ourselves and our colleagues to this standard.

Promoting Diversity and Inclusion

We are committed to fostering a diverse and inclusive work environment. We recognize that the best solutions to our customers' and communities' challenges come from diverse voices that represent the varied communities where we live and work, and the customers we serve. We value the ideas, opinions, and varying experiences of our colleagues, customers and other stakeholders. Together we aim to cultivate an inclusive culture where everyone feels a sense of belonging and encouragement to contribute to our mission.

While we all have the right to our own beliefs and values, we need to be sensitive to how our personal views may be received by others when we express them in the workplace or as Xylem's representative. Xylem's communication tools and social media tools should never be used to advocate religious, political or other potentially sensitive personal beliefs. (See our [Social Media Policy](#).)



What If...

What if a colleague is telling stories or jokes that imply that women are not qualified to work in this business?

Take action when you experience a colleague or business partner expressing views that you know are inconsistent with our Code of Conduct and policies. Speak with the person making the comment, a trusted leader or your HR business partner. Speaking up will enable us to do something about the inappropriate behavior. (See [Asking Questions and Raising Concerns](#).)



Where can I get more information?

- [Prevention of Workplace Harassment Policy](#)

Ensuring Equal Opportunity

We provide our colleagues with equal opportunities for employment and career advancement. Our employment decisions are based only on relevant considerations, such as the individual's qualifications and abilities – never on age, race, color, sex, religion, national origin, disability, sexual orientation, gender identity or expression, veteran status or any other legally protected personal characteristics of the individual.

What can I do to ensure equal opportunity?

- **Build** a diverse slate of qualified candidates for open roles.
- **Make** employment decisions based solely on merit.
- **Accommodate** differently abled people.
- **Refuse** to accept any excuses for prejudice.

Preventing Harassment and Workplace Bullying

We stand up against abusive, threatening, offensive or intimidating verbal or physical conduct. This standard applies whether at work or at work-related activities after working hours. Any behavior that harms our colleagues' ability to do their work or otherwise affects the terms and conditions of their employment is unacceptable. This type of behavior has no place at Xylem and goes against our mission.

Standing Up

Speaking up when you or someone you know is experiencing discrimination, harassment or bullying helps promote a respectful workplace. (See [Asking Questions and Raising Concerns.](#))

What If...

What if my manager says he does not want older people on his team because they cannot keep up with the pace?

Speak up. This kind of discriminating remark could unfairly limit career opportunities for a broad section of our workforce. At Xylem, we reject stereotypes and recognize ability regardless of age.



Where can I get more information?

- [Equal Employment Opportunity Policy Statement \(US\)](#)
- [Equal Employment Opportunity \(EEO\) Affirmative Action Policy](#)
- [Hiring and Staffing Policy](#)
- [Prevention of Workplace Harassment Policy](#)
- [Disability Accommodation Policy](#)



What are some actions that a bystander can take?

We are all accountable for promoting a harassment-free workplace. Witnessing harassment often happens when we least expect it. Be prepared. The next time you are a witness to harassment, remember the things you can do to be an effective ally:

RECOGNIZE THE HARASSMENT

1

Do not ignore the problem or look the other way.

TAKE ACTION

2

Speak up and stand up for what is right. Interrupt the harassment, call out or distract the harasser or help the target of the harassment get away from the situation. Or if you are uncomfortable taking direct action, refuse to give the harasser an audience by walking away.

FOLLOW UP

3

Speak privately with the person who was harassed. Show your support and encourage your colleague to report the harassment or offer to report the conduct for them.

What If...

What if my manager frequently loses his temper and yells at our team for things like missing a target?

Actions like these shape our organization's culture, sending signals about the acceptable way to behave. We want to foster a respectful working environment. If you feel that the conduct is persistent and interferes with your ability to do your work, speak with someone about your experiences and what can be done to improve the situation. (See [Asking Questions](#) and [Raising Concerns](#).)

What is harassment?

Harassment is any unwelcome conduct directed at another person that has the intent or effect of creating an intimidating, hostile or offensive work environment for that person. It includes things like physical or verbal intimidation, inappropriate jokes, racial slurs, name-calling, unwelcome touching or sexual advances and the posting or sharing of obscene images. Legal definitions of harassment may vary from country to country.



Where can I get more information?

- [Prevention of Workplace Harassment Policy](#)



STAYING SAFE AND HEALTHY

At Xylem, we care about the well-being of our colleagues, customers, business partners and visitors. We are committed to getting everyone home safe and healthy every day. Nothing justifies ignoring our health and safety requirements.

Workplace Safety

We are committed to safety at our facilities, on the road and at our customer sites. No matter what you do or where you work, you are expected to put safety first. Our Accept-Only-Zero philosophy guides these daily actions and decisions. This means knowing and following your facility's health and safety rules and response plans as well as all applicable laws, regulations and public health guidelines.

A safe workplace is not only one that is injury-free but also one that is free of threats and violence. We do not tolerate assaults, physical or cyberstalking, or similar acts of violence or intimidation. (See [Preventing Harassment and Workplace Bullying](#).)

What If...

What if I am working at a business partner's site? Do Xylem's safety rules apply?

If you are representing Xylem at a business partner's location, you must follow our Code of Conduct and our policies. You must also understand and follow the partner's health and safety rules.

SPEAK UP IF ...

You witness unknown people or unusual activity that could lead to theft or harm.

You observe or are subject to violence or threats.

You are asked to do a job or task you consider unsafe or are not properly trained to do.

You observe or are made aware of an unsafe condition or potential danger to others or yourself.

You suspect that a piece of equipment is not operating properly and may be unsafe.

How do I prioritize health and safety?

- **Know and follow** company and health and safety policies and procedures.
- **Be aware** of your surroundings and take appropriate action to address risks before starting work.
- **Report** unsafe conditions like workplace hazards and broken equipment.
- **Report** job-related injuries or illnesses.
- **Know** what to do in case of injury or other workplace emergencies.
- **Watch out** for each other to avoid unsafe conditions or behaviors.

Mental Health and Well-Being

Mental health is an important part of overall health and well-being. We are allies for each other. If someone appears to be struggling, check in to see if you can help. Xylem provides support to colleagues and their families for maintaining mental and emotional well-being with local resources, and in many countries Employee Assistance Programs. This can be a critical resource at all times, but particularly when facing difficulties. You should never feel ashamed or embarrassed to ask for help.

Drugs and Alcohol

To keep ourselves and our colleagues safe, we may never perform work for Xylem while under the influence of alcohol, illegal or unauthorized drugs or over-the-counter or prescribed medication that impairs our ability to function effectively. This applies whether you are working at Xylem facilities, working remotely, traveling on company business or working at customer sites.

If you are concerned that a colleague may be under the influence of alcohol or a drug that impairs their ability to function effectively while at work, raise your concern with your manager.

Appropriate Use of Alcohol

In appropriate settings, Xylem may authorize alcoholic beverages at company functions or events. In those situations, colleagues and business partners may consume alcohol in moderation, provided that their conduct and demeanor remain businesslike and professional at all times. All applicable laws regarding alcohol consumption must be followed, including laws regulating driving while under the influence and public intoxication.



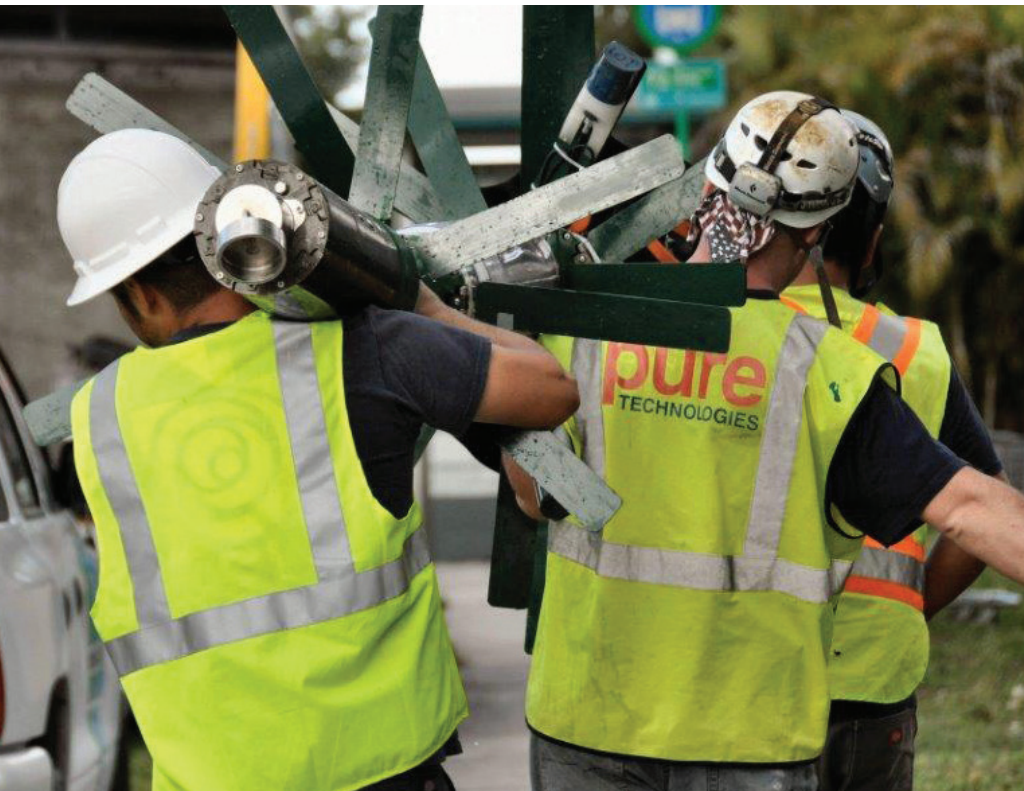
Where can I get more information?

- [Environment, Safety and Health Policy](#)
- [Travel, Expense and Security Policy](#)
- [Prevention of Workplace Violence Policy](#)
- [Substance Abuse Prevention Policy](#)
- [US Substance Abuse Prevention Policy](#)

RESPECTING OUR COLLEAGUES' PRIVACY

We respect our colleagues' privacy and treat their personal information with appropriate care. Personal details are only shared with proper authorization.

Part of creating a respectful workplace is respecting the boundaries our colleagues set on the personal information they are comfortable sharing at work. Colleagues should never feel forced to share details about their personal lives. Colleagues should also feel confident that their personal data is being kept confidential. Personal data is any information that could be used to identify someone, either directly or indirectly. This includes things such as a colleague's name, birth date, home address, government identification number or medical details. (See [Maintaining Data Privacy](#).)



What If...

What if I received a misdirected email that included an attachment with colleagues' names, addresses and government identification numbers?

Inform the sender and report the incident to [Data Incident Response](#). Then delete the email and its attachment. Do not forward or make copies of the personal data.



Where can I get more information?

- [Data Privacy Policy](#)



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AVOIDING CONFLICTS OF INTEREST

At work, we always act in the best interests of Xylem. We do not let our personal interests interfere, or appear to interfere, with our actions on behalf of the company.

Some examples of conflicts of interest

While we cannot list every situation that could create a conflict of interest, these are some common conflicts you could encounter.



Personal Relationships

- Dating a coworker.
- Working with a customer that employs a close friend.
- Having a parent with large financial investments in a supplier.



Business Opportunities

- Using information learned through work for personal gain.
- Personally profiting off of Xylem's confidential information.



Outside Investments

- Owning stock in a supplier that you have influence over.
- Investing personal funds in a transaction in which Xylem may have interest, such as a small water technology start-up.



Outside Work

- Working a second job that interferes with job responsibilities at Xylem.
- Using Xylem resources for an outside job.

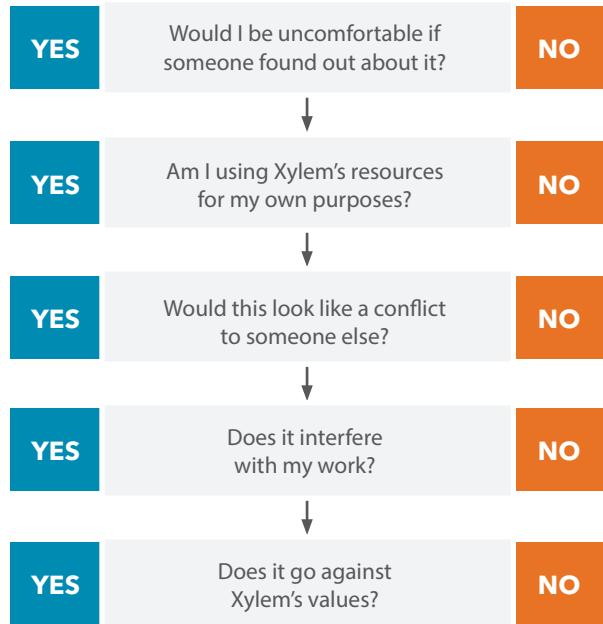
What is a conflict of interest?

A conflict of interest exists whenever our personal interests interfere or give the appearance of interfering with our job responsibilities. Even the *suggestion* of a conflict can lead others to think we are not acting in Xylem's best interests.



Is it a conflict of interest?

If you are considering whether a situation is a conflict of interest, start by asking these questions:



If you answered "yes," to any of these questions, seek guidance from your manager or HR business partner.

Often when there is potential or perceived conflict of interest, we can find a way to manage it effectively. Inform your manager and HR business partner of any known or potential conflicts of interest and then develop a plan to address the situation.

- **Be aware** of activities or relationships that may conflict with your work at Xylem.
- **Consult** the policy or seek advice if you are unsure whether a conflict exists.
- **Tell** your manager and HR business partner about known or potential conflicts of interest.
- **Use** company facilities, equipment and time only for work-related activities.

What If...

What if my brother-in-law works for one of our distributors?

Discuss the situation with your manager. If your job involves interacting with the distributor, there could be a potential conflict of interest and the situation needs to be disclosed.

What if my friend runs a catering company? Can I hire my friend for a company sponsored event?

It may be possible for Xylem to hire your friend's catering business, but the objective is to achieve the best overall value for Xylem. That means that all vendors must be evaluated objectively, in line with our policies (such as the [Global Procurement Policy](#) and [Delegation of Authority Policy](#)).

What if my sister wants to apply for a job opening in my department at Xylem?

Colleagues can be excellent resources for finding candidates for open positions. Be sure to disclose your relationship to your HR business partner and manager if your sister is hired so any appearance of favoritism or conflicts of interest can be addressed appropriately if needed.



Where can I get more information?

- [Conflict of Interest Policy](#)
- [Conflict of Interest Guide](#)
- [Employment of Closely Related Individuals and Those in Consensual Romantic Relationships Policy](#)

COMPETING FAIRLY

We believe in free and fair competition. We always compete for business openly, honestly and lawfully.

Competition drives invention and innovation. At Xylem, we gain our competitive advantages through the quality of our solutions, rather than through unethical or illegal collaboration with our competitors. Agreements that create an unfair advantage in the market, fix prices, divide customers, assign winners in a bidding process, boycott suppliers or prevent competitors from entering the market are never appropriate.

Industry and trade association meetings serve legitimate and worthwhile purposes. However, these meetings also carry risk because they bring together competitors who might discuss matters of mutual concern and potentially cross the line of what is permissible. If you ever find yourself in any kind of anti-competitive situation or conversation, exit it immediately and report what happened to Ethics and Compliance.



How do I ensure fair competition?

- ✓ Make decisions on how, when and where to compete independently from competitors.
- ✓ Avoid making harmful or untrue statements about competitors.
- ✓ Obtain information from publicly available sources or open and honest conversation.
- ✓ Involve Legal when communicating or entering into any written or verbal agreement with a competitor.
- ✓ Be mindful of conversations with competitors at trade shows or trade association meetings. Do not discuss pricing strategies, actual prices or competitive bidding matters.
- ✓ Avoid agreements with suppliers, distributors or customers that impermissibly restrict competition.
- ✓ Follow the antitrust and competition laws in the countries where we operate.
- ✓ Alert Ethics and Compliance if you suspect any anti-competitive behavior or are approached by a competitor.

Competitive Intelligence

Knowing our competition is critical for making strategic business decisions, and we always compete in ways that are fair, transparent, legal and ethical. We gather competitive intelligence by

- Relying on publicly available information, such as published articles, regulatory filings and online posts
- Conducting market research, either directly or through external agencies
- Never seeking or accepting information if obtained illegally or unethically, such as through bribery or theft
- Never accepting confidential information without the owner's consent
- Avoiding competitor information if we know we are not meant to obtain it
- Never seeking competitor information from job applicants or current employees who worked for a competitor
- Respecting the terms of confidentiality agreements



What If...

What if I want to hire an employee from a competitor?

Xylem frequently hires employees from competitors. However, this practice should not be used as an opportunity to learn confidential information about our competitors. Confidentiality obligations generally extend beyond the end of employment.

What if a competitor suggests that we meet up with some of the other trade association members after a regular meeting to compare notes on the market?

Politely say "No, thank you." Even though it is acceptable to discuss non-confidential information, an informal discussion may quickly turn to subjects that should not be discussed, such as pricing or anti-competitive practices. Just being present when illegal discussions are taking place may, even if you are not participating, present risk to you personally and to Xylem.



Where can I get more information?

- [Antitrust and Competition Law Compliance Policy, Toolkit and Manual](#)

MAKING DEALS AND WINNING BUSINESS

We win business on the strength of our products and services. We choose customers, suppliers and other business partners who share our same commitment to integrity and ethical standards.

Leading with integrity in our business dealings strengthens our reputation as a trustworthy business partner. We never offer or accept bribes from anyone or permit anyone to offer or solicit bribes on our behalf. In some countries, side payments to government officials to speed up some process or action (often known as facilitation payments) may be common business practice, but such payments could be seen as bribes and are therefore not permitted. Regardless of local custom or the practices of other companies, at Xylem, we follow anti-corruption laws and do not permit corruption in any form.

Corruption law violations can be serious and result in damage to our reputation, fines, penalties and even prison time. Corruption also harms communities and the marketplace, making it harder for everyone to do business. We draw a very hard line at engaging in any form of corrupt behavior.

We frequently work with distributors, agents or other channel partners, but we do not deal with third parties who engage in or promote corrupt practices. Nor should we ever ask a third party to take an action that we would not be permitted to take ourselves. The actions of third parties who act on our behalf can be attributed to Xylem, which is why we have a robust due diligence process for third parties – to make sure our business partners share our commitment to fighting corruption and promoting ethical practices.



Anti-Corruption Due Diligence

Always conduct any required anti-corruption due diligence reviews before engaging a third party or renewing a business relationship. Our [Anti-Corruption Due Diligence Framework](#) provides information on the types of third parties that require review and approval and those that do not. If your work involves engaging third parties, it is your responsibility to know and comply with our anti-corruption due diligence process.

What is a bribe?

A *bribe* is anything of value offered or accepted to influence a business decision or obtain a business advantage. Bribes can take many forms, including cash, gift cards, entertainment, inappropriate discounts, hiring a family member or a friend of someone you seek to influence, charitable contributions that are outside of our policy guidelines or any other favor offered in an attempt to influence a business decision.

What is a kickback?

A *kickback* is the return of a benefit, usually cash, as a reward for awarding business. It is similar to a bribe and should never be requested or accepted.

Lobbying

Lobbying is a means of influencing government action and can be permissible when done transparently and in accordance with governmental regulations. Any lobbying on behalf of Xylem, either directly or through third parties, must be done lawfully and with permission from Legal.



What If...

What if our agent suggests we pay an additional fee, outside of a normal process, so our goods can clear customs more quickly?

This could be a request for a facilitation payment. Facilitation payments are not permitted. For more information on how to identify a facilitation payment, see the Anti-Corruption Policy and Manual.

What if a distributor offers to share some of the project profits with my team if Xylem chooses to give the project to the distributor?

Report this solicitation to Ethics and Compliance. This would be considered an illegal kickback and should not be accepted.

What if my team wants to start work with a new distributor before the due diligence process is complete?

Due diligence must be complete before engaging with new third parties. We conduct anti-corruption due diligence to ensure Xylem works with business partners who share Xylem's high ethical standards. Contact your Regional Due Diligence Coordinator to discuss the urgent nature of your situation and understand the steps to take to ensure efficient movement through the process.



Where can I get more information?

- [Anti-Corruption Policy](#)
- [Anti-Corruption Manual](#)
- [Gifts, Hospitality, Travel and Charitable Contributions Policy and Quick Guide](#)

Gifts, Hospitality and Customer Travel

Offering or accepting gifts, entertainment or hospitality can help build and strengthen business relationships. However, these items should never be used to influence a business decision. They also should never create or give the appearance of a conflict of interest.

Our policies and guidelines set out the acceptable value limits, what needs to be preapproved and how to obtain preapproval. By following these guidelines, you can build business relationships and avoid giving the impression that business decisions were improperly influenced.

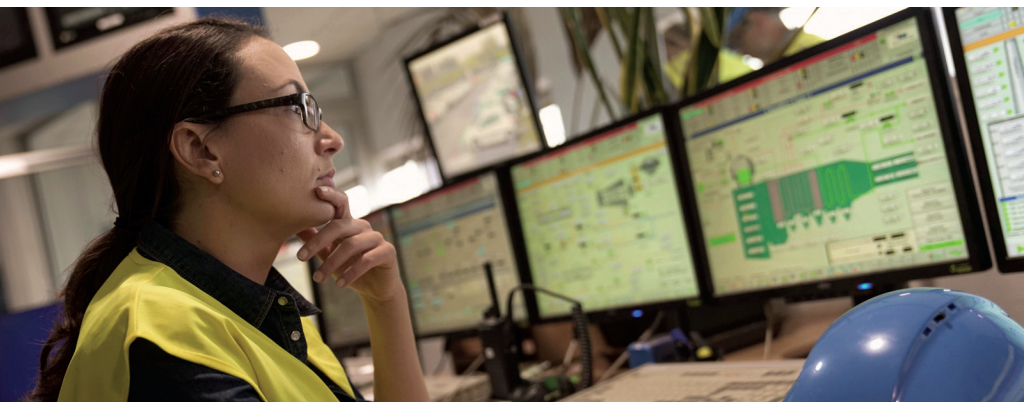
Gifts or entertainment should always be:

- For a proper business purpose.
- Nominal in value and appropriate under the circumstances.
- Permitted by Xylem's policies and the policies of the business partner.
- Accurately documented.

We never offer cash, gift certificates or other cash equivalents as a gift. Consult the policy on charitable contributions before making a donation that would directly or indirectly benefit a business partner. (See [Community Involvement and Charitable Donations](#).)

Government Officials

Pay close attention to Xylem's gift and hospitality policies when entertaining or giving gifts to government officials. Because of antibribery laws, the thresholds are different and approvals are required. If you have questions, contact Legal before moving ahead.



What If...

What if I want to give a customer a Xylem water bottle as a small token of appreciation?

Offering an inexpensive Xylem-branded gift to customers is usually acceptable. Make sure recipients are allowed to receive the gift (sometimes their policies or laws do not allow it).

What if a customer wants me to arrange dinner and tickets to a sporting event after factory acceptance testing?

Offering infrequent, moderately priced meals and hospitality to customers is generally permitted under our policies and the law, especially if the customer is accompanied by a Xylem representative. Ensure these types of expenses are legal, properly preapproved, appropriately documented and also allowed under the customer's laws and policies.



Where can I get more information?

- [Anti-Corruption Policy and Manual](#)
- [Gifts, Hospitality, Travel and Charitable Contributions Policy and Quick Guide](#)
- [Political Activities Policy](#)

Working with Suppliers

Our suppliers are an essential part of our ability to meet our customers' needs. We choose suppliers that share our commitment to integrity and ethical standards. Our sourcing decisions are based on objective criteria, such as quality, price, service and delivery record. Our [Supplier Code of Conduct](#) lays out our expectations for our suppliers and helps them maintain the same high ethical standards that we hold for ourselves.

How We Deal with Our Suppliers

- **Avoid** conflicts of interest with suppliers. (See [Avoiding Conflicts of Interest](#).)
- **Share** confidential information with suppliers only when proper protections are in place.
- **Ensure** that all partners are committed to ethical and lawful business practices outlined in the Supplier Code of Conduct.

Sourcing Responsibly

Our commitment to our core values extends to our suppliers. We expect our suppliers to respect human rights through fair and ethical business practices. (See [Contributing to Our Communities](#).) When selecting a supplier, consider whether the supplier:

- Provides proper working conditions, hours and compensation.
- Engages in fair labor and sustainable sourcing practices to protect the health and well-being of workers and communities.
- Prohibits the use of child or prison labor.
- Takes human rights violations seriously.

Money Laundering

Money laundering happens when people try to move money that was made illegally into legitimate accounts to cover up the illegal source of the funds. Xylem does not condone, facilitate or support money laundering. Be alert for any unusual financial transactions that may indicate money laundering and report any suspicious financial activities or transactions.



Where can I get more information?

- [Supplier Code of Conduct](#)
- [Global Procurement Policy](#)
- [Indirect Purchasing Policy](#)
- [Supplier Risk Management Policy](#)
- [Trade Compliance, Management, Import and Export Policies](#)
- [Anti-Corruption Policy and Manual](#)

Public Procurements and Government Contracts

Xylem frequently supplies products, services and solutions to government customers through participation in public procurements. Government customers can be cities, state or federal governments, municipalities or state-owned entities. There is a special obligation of trust that applies when participating in public procurements, and missteps could cause Xylem to lose its ability to participate in future procurements.

- Take care in assembling submission information to ensure the accuracy of all information.
- Supervise business partners who assemble submission information on our behalf.
- Never misrepresent any aspect of our products, services or solutions or encourage others to make misrepresentations for us.
- Follow all procurement regulations and never attempt to influence a procurement decision through outside payments, favors or gifts.

If we win a contract with a municipality or government agency, we must comply with all applicable laws and regulations. These regulations vary by country, can be complex and stricter than those governing our commercial contracts and are subject to change. Colleagues who participate in bidding for and performing government contracts should contact Legal for support when needed.

Imports and Exports

As a global company, we frequently send and receive products, services and technology from different countries. Most countries where we do business have regulations on trade between nations. Each of us has a responsibility to understand and comply with the trade laws, regulations and restrictions in the countries where we operate. Following these rules allows us to keep our commitment to on-time and in-full delivery of products, services and technology.

- **When importing**, or bringing materials, products, services or technology (including software) *into* a country, articles should always be described accurately and be assigned the correct tariff code.
- **When exporting**, or sending materials, products, services or technology (including software) *out of* a country, articles should always be described accurately and reviewed for export controls, trade embargoes or sanctions and boycott language.

Importing or exporting goods, services or technology (including software) without proper government approvals can cause Xylem to lose its ability to participate in international trade, or other penalties. Trade requirements can be complex and subject to change, so contact a member of Trade Compliance for guidance or when you have questions.

What If...

What if I am asked to sign an origin declaration, but I am not aware of the manufacturing process?

Contact a member of Trade Compliance. Their role is to ensure the safe, efficient and cost-effective movement of materials, products, services and technology across international borders so that we minimize the risk of fines, penalties, reputational damage or other disruptions that may result from noncompliance.



Where can I get more information?

- [Contract Review Guidelines](#)
 - [Americas](#)
 - [Emerging Markets](#)
 - [Europe](#)
- [Global Product Sales Contract Review Guidelines](#)
- [Anti-Corruption Policy and Manual](#)
- [Anti-Corruption Due Diligence Framework and Processes](#)
- [Gifts, Hospitality, Travel and Charitable Contributions Policy and Quick Guide](#)
- [Trade Compliance Resource Page](#)





SAFEGUARDING COMPANY INTERESTS

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MAINTAINING XYLEM'S REPUTATION

We all act as brand ambassadors for Xylem. We enhance our reputation every day by living our values and following our policies.

Our reputation is one of our most valuable assets. Each of us is responsible for cultivating and protecting Xylem's reputation, both among our colleagues and with external stakeholders. There are many aspects to Xylem's reputation including the quality of our products, statements made in the media and each colleague's behavior with customers, business partners and community members. It is our responsibility to ensure our reputation is as strong as it can be.



What If...

What if a colleague suggests we skip a quality check to meet our production deadline?

We should never cut corners to meet deadlines. Raise the issue to your manager or via one of the other reporting channels if you are not comfortable that your colleague will follow the required process.

What if I receive a call from a reporter asking about a new product launch?

All calls or emails from reporters should be forwarded to Corporate Communications. Colleagues should not speak with news media unless they have been authorized to do so.

What if a colleague whose social media profile shows that they work at Xylem is posting comments that I find offensive?

Discuss your concern with a trusted leader or your HR business partner or report it through the [Xylem Integrity Line](#).

HOW WE MAINTAIN OUR REPUTATION

Product Quality, Reliability and Safety

Quality, reliability and safety are the foundation on which our products are built. As we develop and offer solutions and services, we are aware of the role cybersecurity plays in protecting our customers, their data and our company. We want to maintain the trust of our customers and business partners by delivering reliable, safe, high-quality solutions.

- Follow all product safety processes.
- Never bypass quality controls or take shortcuts that compromise quality or safety.
- Immediately report any concerns about product quality or safety.
- Ensure product feedback from customers is shared with the product quality review board.
- Ensure all product safety incident feedback is shared with the appropriate business unit's product safety board.



- [Product Safety Policies](#)
- [Product Cybersecurity Policy](#)

Practicing Good Cybersecurity

We all have a role in protecting Xylem from cyber threats. We are vigilant when using technology to ensure that Xylem's information and our business partners' information is protected.

- Use only authorized software and approved cloud storage solutions.
- Report potential phishing attempts and suspicious cyber incidents.
- Protect Xylem's confidential information and that of our customers and business partners.
- Understand the requirements outlined in the Cybersecurity Policy.



- [Cybersecurity Policy](#)
- [Acceptable Use of Information and Technology Resources Policy](#)

Avoiding Fraud, Bribery and Corruption

We win and retain business on the strength of our products. We build relationships based on transparency and trust.

- Never offer, promise or give anything of value to a government official or anyone else to gain a business advantage.
- Never offer or accept bribes or kickbacks.
- Keep accurate and complete records so all payments are correctly detailed.
- See [Making Deals and Winning Business](#) for more information.



- [Frauds and Thefts Policy](#)

Media and Other Inquiries

We provide the media and the public with accurate and consistent information regarding our business. We speak on behalf of Xylem only when we are authorized to do so. We enhance our reputation with truthful, clear and consistent messaging.

- Do not speak on behalf of Xylem unless you are authorized to do so.
- Refer all media inquiries to Corporate Communications (media.enquiries@xylem.com).



- [Fair Disclosure Policy](#)

Using Social Media Responsibly

We embrace the power of social media to build connections, but we make sure that any personal opinions we express online are identified as our own. We do not post anything that would be disrespectful, harassing or discriminatory, or that would expose confidential information of Xylem or our partners.

- Use good judgment when posting online, including expressing ideas and opinions in a respectful manner.
- When referring to Xylem, Watermark or our work, make clear that any opinions expressed in your social media feeds are your own.
- Do not give the appearance of representing the company unless you are expressly authorized to do so.
- Protect Xylem's confidential, proprietary information and that of our customers and business partners.



- [Social Media Policy](#)

SAFEGUARDING COMPANY ASSETS AND PROPERTY

We use our assets for legitimate business purposes and protect them from loss, theft, fraud and misuse. We avoid using company assets for personal gain.

Protecting Our Assets

Xylem’s assets include everything that we use to conduct business. Xylem’s assets can be physical, electronic, financial or information and are intended to be used for business purposes. We all have a responsibility to keep company assets safe from theft, loss, waste or abuse and ensure that they are used only to promote Xylem’s business interests. By protecting Xylem’s assets, we also protect our colleagues, customers and business partners.

Examples of Xylem’s Assets

- **Physical assets:** office supplies and equipment, production machinery, inventory and company vehicles.
- **Electronic assets:** computer hardware, software and systems, mobile phones and tablets.
- **Financial assets:** money or anything that can be converted into money, like checks.
- **Information assets:** intellectual property, business strategies and processes, customer lists and pricing details.

To safeguard Xylem’s assets, we:

- **Take care** of assets in our control to avoid loss, damage, destruction, theft or unauthorized use.
- **Use** company funds honestly, responsibly and in accordance with our policies.
- **Report** any theft, abuse or misuse of our assets.

What If...

What if I want to take home some materials that have been scrapped?

Speak with your site’s management. Scrap materials are Xylem property and generally cannot be taken for personal use.



Using Technology Responsibly

Xylem’s technology and electronic resources should be used for their intended business purposes. Occasionally using phones, computers or the Internet for personal reasons is acceptable, but it should not interfere with your work and must conform to Xylem’s policies and the law.

When using our technology, practice good cybersecurity:

- **Only use authorized software** and never attempt to install software yourself. Installing software yourself may violate license agreements, putting Xylem at risk for violation fines. Software downloaded from untrusted sites or providers may also introduce cyber threats, such as ransomware, into our environment.
- **Identify suspicious emails** by carefully analyzing the sender’s email address and hovering over any links it asks you to click to see if it goes to a legitimate web page associated with the message. If unsure, use the Report Phishing button or send an email to phish.reporting@xylem.com.
- **Delete unneeded data files.** Keeping unnecessary data, especially if it includes personally identifiable information, such as names, phone numbers, national IDs, health data or personal mailing addresses, can expose the company to increased risk. Follow our [Record Keeping Policy](#) and manage your data files accordingly.
 - Practice secure inbox management by deleting email messages that are no longer needed and transferring important information to the appropriate information management systems.
- **Use approved cloud storage applications** to store and share work-related files with internal colleagues and external business partners.

Always use good judgment and keep in mind that anything you create, store, download, send or receive using our systems could be viewed as company property and can be reviewed by us at any time, as permitted by applicable law. You should not expect emails or anything else that is transmitted or stored on Xylem’s systems to be private, other than as required by applicable law. Approval from Xylem’s Ethics and Compliance Officer is required before accessing the email account or reviewing the Internet activity of any active Xylem colleague.



Where can I get more information?

- [Acceptable Use of Information and Technology Resources Policy](#)

Information Security Reporting

Report potential phishing attempts by using the *Report Phishing* button in the Outlook ribbon or by emailing phish.reporting@xylem.com.

Report suspicious cyber incidents and all other cybersecurity questions and concerns to cyber.security@xylem.com.



What If...

What if I want to get new software installed?

Open a [Smart Support ticket](#) if you would like software installed.

What if I want to check my Xylem email from my personal device?

You may access your work email on your personal device if you have followed the requirements of the Mobile Device Management Standard, which ensures the Xylem content is secure.

What if my manager asks me to log into a system using her user ID and password to retrieve some reports that I would not otherwise have access to?

It is against our policy to share passwords. Also, access to restricted information should be limited to those with a need to know and who are authorized to have access. Remind the manager that you do not have access to this system and this information due to their sensitivity.

Maintaining Data Privacy

Sometimes Xylem must collect, use, store or share personal information from our colleagues, customers or partners. When we do, we take care to keep that information safe and confidential. We collect only the personal data that is needed and use it only for legitimate business purposes. We share it only with people who are authorized to see it. We always handle personal data responsibly and in compliance with the data privacy laws where we operate.

How do I support data privacy?

- Collect only the personal data that is needed.
- Follow our data retention policy when retaining personal data.
- Use personal data only for legitimate business purposes.
- Share personal data only with authorized people.

Protecting Proprietary and Confidential Information

Information is an important asset and critical to our company's success. As we continue to innovate and develop solutions to respond to global water

challenges, we need to protect our confidential information and the confidential information entrusted to us by our partners and customers. This helps us maintain our competitive advantage.

Be familiar with the type of information that your business group considers proprietary or confidential and always take appropriate precautions to protect such information from improper disclosure. Share proprietary or confidential information only with people who are authorized to see it and have a business need to know it. This guideline also applies to colleagues within Xylem.

- **Before sharing** proprietary or confidential information with external partners, check that there is a legitimate business reason for sharing the information and an appropriate confidentiality or nondisclosure agreement is in place.
- **Respect** the proprietary information of others. Avoid unlicensed use of someone else's invention, patents, software or registered identifiers.
- **Notify** Ethics and Compliance if you receive confidential information from a competitor or business partner that we were not supposed to receive.

What is personal data?

Personal data is any information that could be used to identify someone, either directly or indirectly. It includes names, phone numbers, email addresses, identification numbers and in some countries even water meter usage information.

What If...

What if I want to discuss an opportunity with a potential new business partner that may involve information confidential to Xylem?

Before you discuss confidential information about Xylem with a new business partner, you must ensure that a fully signed nondisclosure agreement (also known as an *NDA*) is in place. We have an automated tool to generate NDAs for signatures to make this process easier: [NDA Process](#).



Where can I get more information?

- [Business Proprietary Information Agreement, Covenant Against Disclosure, and Assignment of Rights to Intellectual Property](#)
- [Intellectual Property Policy](#)
- [Data Privacy Policy](#)
- [Privacy Statement](#)



RECORD KEEPING AND FINANCIAL REPORTING

We maintain books and records that accurately reflect our business and financial situation. We never knowingly record incorrect information.

Accurate records are complete, timely and understandable. Everyone is responsible for accurate recordkeeping. It is essential to efficient and profitable business operations. This applies whether you are filling out a timesheet, submitting an expense report, preparing bidding documents, detailing a financial forecast, recording financial results or creating any other business record. Many people inside and outside Xylem rely on the accuracy of our records. Accurate recordkeeping helps us maintain trust and confidence with our stakeholders.

Knowingly recording incorrect, incomplete or misleading information about any transaction or event is never allowed. We should also never intentionally delay recording transactions or events or ask someone else to create inaccurate records. Secret or unrecorded funds or assets may not be established or maintained for any purpose. We each have a responsibility to keep full, fair, accurate, timely and understandable records.

How do I keep accurate records?

- **Record** all assets, liabilities, revenues, expenses and business transactions completely, accurately, in the proper period and in a timely manner.
- **Ensure** that records and accounts conform to generally accepted accounting principles and our internal controls.
- **Never set up** secret or unrecorded cash funds or other assets or liabilities.
- **Maintain** company records in accordance with our records retention requirements.
- **Preserve** documents or records that are subject to investigation or may be needed in legal proceedings.
- **Speak up** if you have concerns about inaccurate business records.

What is a business record?

A business record is any form of communication or information about or related to our company. It can be as informal as a handwritten note or as formal as a public financial filing. Our time cards, expense reports, production records, sales orders, backlog information, commercial contracts and invoices to customers or from vendors are all business records.

What If...

What if people who report to me leave Xylem? Should I delete the working files and business records that they maintained?

Refer to our [Record Keeping Policy](#) for information on what must be kept and what can be destroyed. Do not dispose of records that are subject to a document preservation notice. Check with Legal if you have questions.



Where can I get more information?

- [Travel, Expense and Security Policy](#)
- [Fair Disclosure Policy](#)
- [Record Keeping Policy](#)



BUYING AND SELLING SECURITIES

We buy and sell stock and other securities based only on information that is publicly available. We do not seek financial gain on the basis of nonpublic information.

While working at Xylem, you may learn or have access to information about our company or our business partners that is not known by the public. This information must be protected and may never be used to buy or sell stock or securities. If a reasonable investor would consider the information important in deciding whether to buy or sell securities, then trading on this information would qualify as insider trading. Anyone at Xylem has the ability to learn inside information, but no one should trade on it. Insider trading is illegal and against our policy.

What is insider trading?

Insider trading occurs when an individual uses material, nonpublic information to buy or sell stocks or other securities in the market. Information that is not known by the public is called nonpublic, or inside, information.

Inside information is material when a reasonable investor would consider the information important in deciding whether to buy or sell shares and can include information regarding financial performance, changes in dividends, a possible merger or acquisition, product or service developments, customer orders or changes in leadership.

Insider trading can also occur if inside information is shared with others so that they can use that information to buy or sell securities. This is called “tipping” and is also illegal.

Participating in insider trading has serious consequences, including criminal fines and prison time.

What If...

What if I want to buy stock in a company that is about to be awarded a large supply contract for a key component in a new product that we are developing?

If, through your work at Xylem, you learn information about another company that is not generally known by the public and that a reasonable investor would view as important in deciding whether to invest in the company – such as the award of a supply contract that is material to the supplier – buying stock on the basis of that information would be against the law.



Where can I get more information?

- [Insider Trading and 10b5-1 Plans Policy](#)



CONTRIBUTING TO OUR COMMUNITIES

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COMMUNITY INVOLVEMENT AND CHARITABLE DONATIONS

At Xylem, we take pride in our role as corporate citizens. We put our principles into action through community involvement and charitable donations, with no expectation of anything in return.

We encourage everyone to make a difference in their communities and to give back through volunteering, including participating in our Xylem Watermark sponsored events and activities.

- **Learn** more about our corporate social responsibility initiatives and how you can play a role in advancing them.
- **Participate** in Xylem Watermark volunteer events and activities.
- **Volunteer** for community programs that speak to your personal passions and interests.

Making Charitable Donations

As a company, we make charitable donations that promote causes that align with our mission. However, charitable donations should never be used with the intent to influence any person or to gain an advantage in business. (See [Making Deals and Winning Business](#).) We should never make charitable donations that benefit ourselves or our relatives, friends or associates. Generally, company funds or assets should not be used to support personal volunteer activities, as this has the potential to create a conflict of interest. (See [Avoiding Conflicts of Interest](#).)

- **Make** charitable contributions on behalf of Xylem only when authorized to do so.
- **Never use** charitable donations to influence customers or business partners.
- **Seek** approval from Legal before making donations to non-Watermark charities or noncharitable organizations.

Community involvement can include political activity, such as donating time or money to candidates or political causes. All political donations must be done in your own name, and not on behalf of Xylem. Donations should never be used to influence a business decision. (See [Making Deals and Winning Business](#).)

Xylem Watermark

[Watermark](#) is Xylem's corporate social responsibility program. Watermark works with nonprofit partners on sustainable development projects that provide education and protect safe water resources for communities around the world in pursuit of its mission to provide education and access to safe water to ensure healthy lives, social equity and resilient communities. Colleagues, customers and partners can take action by volunteering their time or expertise to Watermark projects and activities.



Where can I get more information?

- [Gifts, Hospitality, Travel and Charitable Contributions Policy and Quick Guide](#)
- [Anti-Corruption Policy and Manual](#)

PROTECTING OUR ENVIRONMENT

Environmental responsibility is an integral piece of Xylem’s approach to sustainability. We are minimizing our environmental footprint through reducing waste, recycling and reusing water, reducing greenhouse gas emissions and creating increasingly sustainable packaging.

- **Follow** all applicable environmental laws and regulations.
- **Reach** out to an Environmental, Health & Safety (EHS) Manager if guidelines are not being followed.
- **Report** any leak, spill or other potential environmental issue.



What If...

What if a colleague is dumping old paint behind a building?

If you witness or hear about something that seems unsafe or not in line with promoting environmental health and safety, report it to your manager or a member of Environment, Health & Safety (EHS). We have procedures for safe disposal that ensure environmental health and safety of our colleagues and facilities.



Where can I get more information?

- [Xylem’s Climate Change Policy](#)
- [Xylem Sustainability Report](#)

SUPPORTING HUMAN RIGHTS

We are committed to conducting business in a manner that respects human dignity and advances human rights, regardless of local business customs. All our colleagues and partners are entitled to safe working conditions and to fair and equal treatment. (See [Respect in the Workplace](#).)

We choose our business partners carefully to ensure that they share our commitment to sustainability and uphold the same standards as we do in protecting the environment and human rights. (See [Sourcing Responsibly](#).)

What If...

What if I notice that some of the employees look very young while visiting a supplier site?

Raise your concern if something does not seem right. Supply chain management (including human rights concerns such as modern slavery and working conditions) is important for Xylem. We expect our suppliers to comply with our Supplier Code of Conduct and model our ethical business practices.



Where can I get more information?

- [Statement on Efforts to Combat Modern Slavery](#)
- [Conflict Minerals Policy Statement](#)
- [Human Rights Statement](#)
- [Global Procurement Policy](#)
- [Supplier Code of Conduct](#)





THE LAST DROP

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ETHICS AND COMPLIANCE AT XYLEM

At Xylem, we have designed our Global Ethics and Compliance Program to foster a culture where our colleagues throughout the organization act responsibly and with integrity and feel empowered to speak up when they suspect that our Code is not being followed. Our program is built on best practices, providing a framework to ensure business is conducted ethically and compliantly. It is designed to prevent, detect and respond to misconduct.

The Ethics and Compliance Team is responsible for administering our multi-factored program. The team members are subject matter experts in investigations, anti-corruption/ bribery, trade compliance, data privacy and antitrust. They support the Ethics and Compliance Review Boards, administer the integrity ambassador program, oversee resolution of ethics and compliance allegations, develop policies, communicate and train on compliance topics and policies and are a channel for speaking up and seeking help.

If you ever have questions about how to interpret our Code of Conduct, a policy or a situation that you think may pose a problem, contact a member of the [Ethics and Compliance team](#) – they are your allies.

WAIVERS

In exceptional and rare circumstances, Xylem may need to waive part of our Code of Conduct. If you believe such a situation applies to you, submit a written request to Xylem’s Chief Ethics and Compliance Officer. Only the Board of Directors may grant waivers of our Code for executive officers and directors. Xylem will publicly disclose any such waivers as legally required.

Xylem may make changes to its Code of Conduct or any policy or procedure at any time. The guidance in the Code of Conduct, our policies or procedures does not modify the employment-at-will relationship.



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Community Involvement	Financial Assets	Political Activity
Company-Issued Devices	Fraud, Bribery and Corruption	Product Quality and Safety
Competing Fairly	Giving and Receiving Business Courtesies	Record Keeping and Financial Reporting
Competition and Antitrust	Government Contracts	Records Retention
Competitive Intelligence	Harassment Prevention	Respect in the Workplace
Confidential and Proprietary Information	Health and Safety	Respecting Our Colleagues' Privacy
Conflicts of Interest	Human Rights	Responsible Sourcing
Cybersecurity	Lobbying	Safeguarding Company Assets and Property
Data Privacy	Maintaining Xylem's Reputation	Social Media
Discrimination	Making Deals and Winning Business	Sustainability
Diversity and Inclusion	Media and Other Inquiries	Waivers
Donations to Charitable Organizations	Modern Slavery	Watermark
Drugs and Alcohol	Money Laundering	Workplace Violence
Due Diligence		



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