



# Code of Conduct

Our **values** advance our **purpose**

Championing the people who make water work everyday

A message from

# Matthew Pine



Colleagues,

At Xylem, our innovative technologies and solutions are helping empower our customers and communities to build a more water-secure world. At the heart of this is our greatest strength — you. It's the dedication and shared values of our team that bring our purpose to life each day.

Each of us plays a vital role in conducting business with integrity. Our Code of Conduct is more than a set of guidelines; it's a reflection of who we are and how we work together — ethically, legally, and respectfully — to achieve our shared goals with our colleagues, customers, and partners.

Our Code of Conduct serves as a unifying foundation for our actions and decisions. It brings our core values — respect, responsibility, integrity, and creativity — into practice, ensuring that how we do business is just as meaningful as what we achieve.

The Code of Conduct applies to all of our colleagues and [partners](#). If you're ever unsure how to navigate a situation or question whether the Code of Conduct is being upheld, don't stay silent — [speak up](#). You have my full support, and we are here to listen and help.

Our reputation as a trusted leader in water is built on your continued commitment to integrity. With our Code of Conduct as our guide, we will keep transforming the future of water — together.

A handwritten signature in black ink, appearing to be 'MP' or 'M. Pine', written in a cursive style.

**Matthew Pine**  
Chief Executive Officer



# Our bold purpose

We are a leading global water solutions company, empowering our customers and communities to build a more water-secure world. Our shared commitment to achieving our purpose defines who we are and what we do. Our sustainable success is 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 talent by making Xylem a great place to work; encouraging career development and growth; cultivating an inclusive, high-impact 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 products, services, and 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 to accomplish our purpose:



**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

Sustainability is at the core of our business strategy, reflecting our belief that advancing environmental stewardship and contributing to a more resilient society go hand in hand with financial success.

As water challenges — from scarcity to emerging contaminants — intensify, communities and businesses worldwide are increasingly prioritizing water security, focusing on the access and stewardship of safe, affordable, and resilient water resources to support sustainably healthy communities and prosperous economies. We are uniquely positioned to support them on their journey, providing innovative solutions and services that empower our customers to deliver clean water, treat wastewater, and protect public health within their communities.





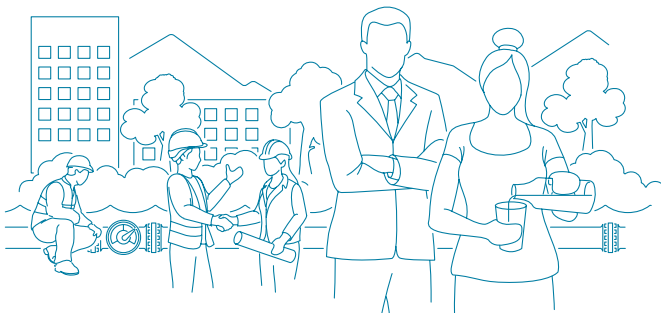
### Supply Chain

Collaborating with suppliers to build a responsible, resilient, and transparent supply chain, while supporting their sustainability efforts.



### Operations

Operating with integrity, reducing our environmental impact, prioritizing health, safety, and well-being, and fostering employee growth in a respectful and inclusive workplace.



### Customers

Enabling our customers to reduce water scarcity and loss, while optimizing water systems to make water more affordable through our wide range of products and application expertise.



### Products

Delivering products that enable our customers to reduce their environmental impact, while upholding our commitment to product safety and lowering our products' environmental footprint.



### Sustainable finance

Leveraging our leadership in sustainability to develop attractive and sustainable financial strategies.



### Communities

Promoting sustainability and water stewardship globally through thought leadership, innovative solutions, technical expertise, community partnerships, and a commitment to youth education.



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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 purpose of leading the way to empower our customers and communities to build a more water secure 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 high-impact 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.

All Xylem colleagues, including executive officers and members of our Board of Directors, must follow our Code of Conduct. It applies everywhere we do business, in all work-related situations, and whenever you represent Xylem, including while working at Watermark-sponsored activities.

We also expect our business partners and supply partners to follow the [Business Partner and Supply Partner 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 purpose. 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.

## 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.





## 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 the Ethics and Compliance team 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.

## 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.

## 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 inclusion and belonging?

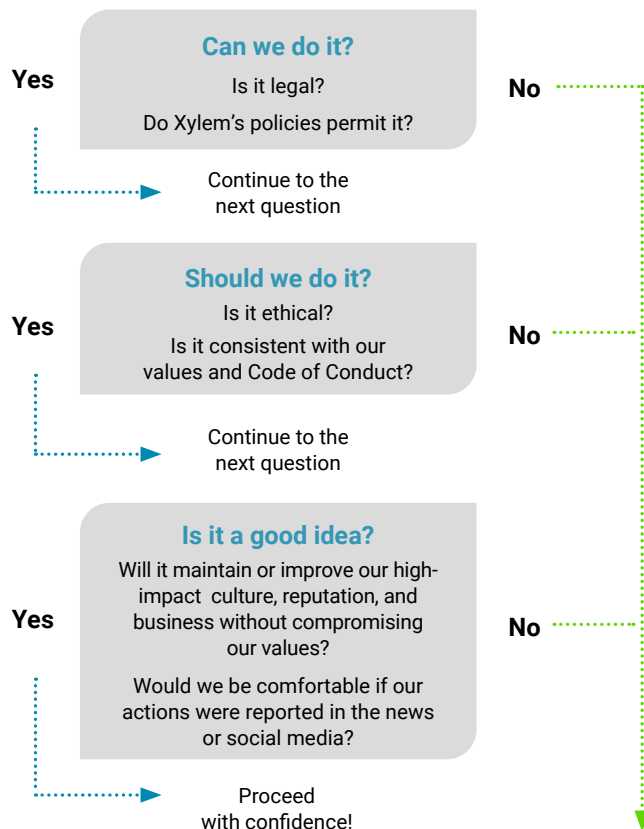
- Value all colleagues for the variety of perspectives they bring.
- Build inclusive teams.
- Be intentional about amplifying the voice of different colleagues.
- Share information and seek input from all team members.
- Search actively for different points of view to find solutions.
- Listen to others 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, HR or Legal business partner, or a colleague from the Ethics and Compliance or Finance team to determine 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.

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



**Manager  
or Another  
Trusted Leader**



**HR Business  
Partner**



**Legal Business Partner,  
Ethics and Compliance or  
Finance Team Colleague**



**Xylem Integrity  
Ambassador**



**Xylem Integrity Line\***  
(1) 888.995.9870  
[integrity.xylem.com](https://integrity.xylem.com)  
For local access number, visit  
[integrity.xylem.com](https://integrity.xylem.com)



**Xylem Chief Ethics and  
Compliance Officer**  
[chief.ethicsofficer@xylem.com](mailto:chief.ethicsofficer@xylem.com)



**Xylem Vice President,  
Internal Audit**  
[internal.audit@xylem.com](mailto:internal.audit@xylem.com)



**Chair of the Audit Committee  
of the Board of Directors**  
c/o Xylem Corporate  
Secretary;  
301 Water Street SE, Suite  
200, Washington DC, USA

\* In the United States, you are not prohibited from reporting potential law violations to, or participating in an investigation conducted by, the Equal Employment Opportunity Commission, the Securities and Exchange Commission, or any other federal, state or local government agency. The same applies to external reporting resources in Europe, which can be found on [integrity.xylem.com](https://integrity.xylem.com).



### 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 the [Xylem Ethics and Compliance team](#).

Refer to [Reporting Concerns](#) 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?

- [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 reassignment 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 the Ethics and Compliance team by filing a report through the [Xylem Integrity Line](#).

Managers, Integrity Ambassadors, and other colleagues should not attempt to investigate reports of suspected Code of Conduct violations unless asked to do so by a member of the Ethics and Compliance team.





# Working with each other

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## Respect in the workplace

We are committed to a workplace that creates a sense of belonging for everyone: where all our colleagues feel involved, respected, valued, heard, connected, able to bring their authentic selves to the workplace, and empowered to do their best work. We hold ourselves and our colleagues to this standard.

### Promoting inclusion and belonging

Inclusion and belonging are fundamental to how we enable our customers to tackle global water challenges. Inclusive teams — bringing together different backgrounds, cultures, and experiences — generate fresh ideas, and help us develop better solutions, strengthen relationships, and understand the unique needs of our customers and communities. This collaboration builds trust, accelerates problem-solving, and allows us to deliver impactful results across markets and communities worldwide. Inclusion and belonging are not just values but essential to our purpose to empower our customers and communities to build a more water-secure world.

### 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 purpose.

### 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 she does not want older people on her 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](#)
- [Canada Disability 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:

**1**

#### Recognize the harassment

Do not ignore the problem or look the other way.

**2**

#### Take action

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.

**3**

#### Follow up

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 high-impact 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](#)
- [Prevention of Workplace Violence Policy](#)



# Our commitment to health and safety

At Xylem, we care about the well-being of our colleagues, customers, business partners, and visitors. We watch out for each other and never compromise on safety. No matter your role or where you work, safety is your responsibility. This includes:

- Actively participating in safety and health activities, following safe work practices, and continually seeking ways to improve.
- Understanding the critical risks and verifying controls are in place before starting work. If you are unsure, stop and ask for help.
- Reporting all safety concerns and incidents, regardless of whether anyone is injured.
- Taking action by stopping work or others if a task cannot be completed safely.

Our Safety Beyond Zero philosophy means we focus on more than just preventing incidents. We embed safety into every decision we make, fostering accountability, and creating a workplace where everyone can thrive through empowerment, innovation, and engagement.



## What if...

### What if I am working at a business partner's or customer'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 customer or partner's health and safety rules. You are expected to adhere to whichever is the highest safety standard, whether Xylem's or the partner's/customer's.

## Speak up if..

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

## Where can I get more information?

- [Environmental, Health, and Safety Hub Site](#)
- [Thrive with Safety Viva Engage Site](#)
- [Environmental, Health, and Safety Policies](#)

### 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, never perform work for Xylem while under the influence of alcohol, illegal or unauthorized drugs, or over-the-counter or prescribed medication that impairs your 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 to a reporting channel.

### 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 Policies](#)
- [Prevention of Workplace Violence Policy](#)
- [Substance Abuse Prevention Policy](#)
- [Global Travel and Expense Hub Site](#)
- [Prevention of Workplace Harassment](#)



# 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](#).)

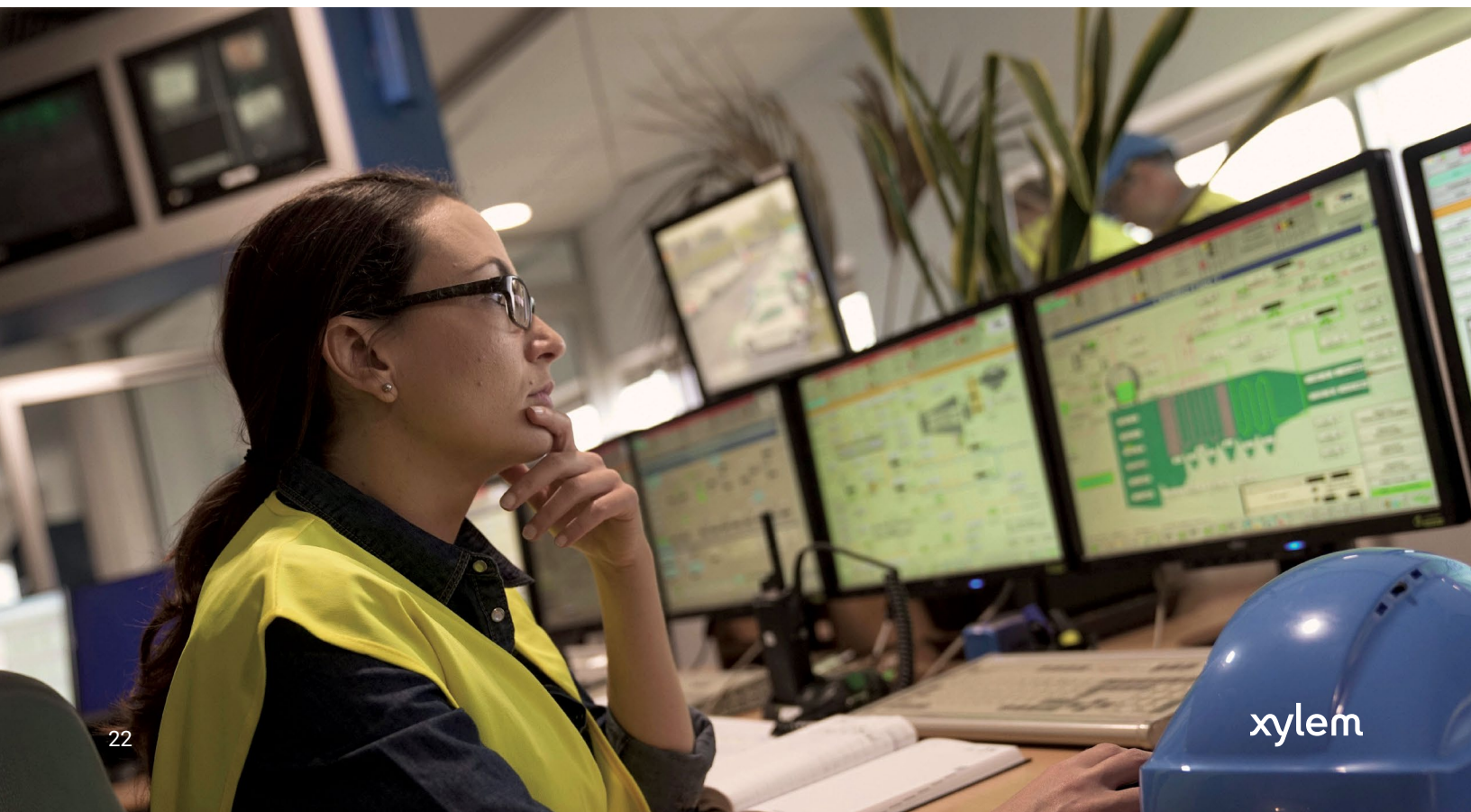
## What if...

**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 [cyber.security@xylem.com](mailto:cyber.security@xylem.com). 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](#)
- [Data Privacy Hub Site](#)



# Working with suppliers, customers, and business partners

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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.

**What is a conflict of interest?**

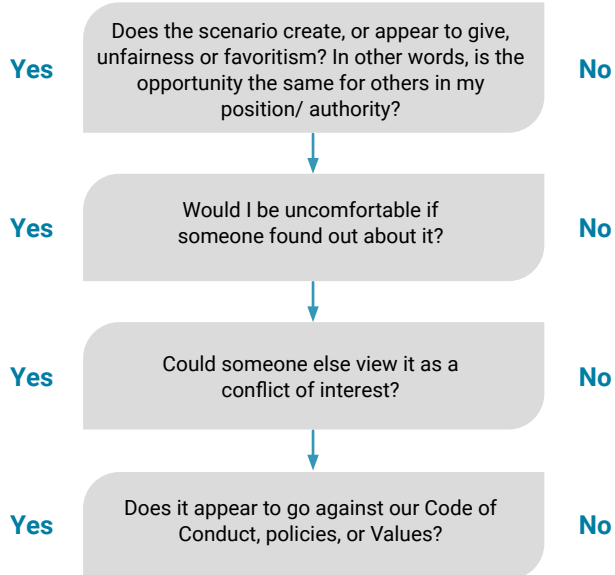
A conflict of interest exists whenever our personal interests interfere or give the appearance of interfering with our job responsibilities. Even the *suggestion* of a conflict can lead others to think we are not acting in Xylem’s best interests.

**Is it a conflict of interest?**

While we cannot list every situation that could create a conflict of interest, below are some examples. Read our Conflicts of Interest policy and guide for more examples and information.

<div></div> <div>Personal Relationships</div>	<ul style="list-style-type: none"><li>• Hiring, promoting, or managing a family member.</li><li>• Having a romantic relationship with your manager or subordinate.</li><li>• Choosing a vendor because it employs a family member.</li><li>• Having a family relationship with a government official who may influence Xylem’s business.</li></ul>
<div></div> <div>Business Interests/ Relationships</div>	<ul style="list-style-type: none"><li>• Awarding jobs to an outside business based on preference rather than qualifications.</li><li>• Investing personal funds in a Xylem transaction, such as a small water technology start up.</li><li>• Having a “side business” that does business with Xylem.</li><li>• Having romantic relationship with an employee from a Xylem vendor where you have business influence.</li></ul>
<div></div> <div>Outside work opportunities</div>	<ul style="list-style-type: none"><li>• Working at another job that interferes with your job responsibilities at Xylem.</li><li>• Using Xylem resources for an outside job or for your own purposes or benefit (including time, information, and equipment).</li><li>• Consulting or working for a competitor.</li><li>• Serving as a board member of a competitor, Watermark entity, other nonprofit entity, Reservoir Affiliate, customer, or other Xylem partner.</li></ul>

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.**



Often when there is potential or perceived conflict of interest, we can find a way to manage it effectively.

Sometimes it is difficult to know if a conflict or an appearance of a conflict exists. When in doubt, discuss the situation with your manager, your HR or Legal business partner, or an Ethics and Compliance team member.

#### How do I disclose a potential conflict of interest?

Potential conflicts of interest are disclosed by submitting a request through Workday.

Click here to learn more: [Conflict of Interest Disclosure Form](#)

#### Where can I get more information?

- [Conflict of Interest Policy](#)
- [Conflict of Interest Guide](#)
- [Employment of Closely Related Individuals 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 products, solutions, and services, not through unethical or illegal collaboration with our competitors.

## How do I ensure fair competition?

### Always:

- Always compete on the merits of our products, solutions, and services, on the prices we charge and on the customer loyalty we earn.
- Always truthfully and accurately comment on competitors' products or services.
- Always comply with and avoid the appearance of violating antitrust and competition laws.
- Always complete required antitrust training.
- Always use caution when interacting with competitors in informal contexts, such as business meals or as part of personal friendships between industry participants.

### Never:

- Never enter into any informal discussions, agreements, or other arrangements with competitors that:
  - Set prices on our products and services.
  - Divide territories, markets, or customers.
  - Prevent another company from entering or operating as they see fit in the market.
  - Coordinate bids or recruitment.
  - Boycott another company.
  - Refuse to deal with a customer or supplier for improper reasons.
- Never violate antitrust and competition laws

There are many antitrust and competition laws that we are required to follow. These laws are complex. If you are not sure how to proceed in a certain situation, contact your Legal business partner before you take action. Violations of antitrust or competition laws may result in severe legal penalties for Xylem and criminal charges for the individuals involved. If you suspect an antitrust or competition violation, report it to [integrity.xylem.com](https://integrity.xylem.com).





## 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.

### Always:

- Always use information about competitors' pricing that is publicly available or obtained from known, legitimate sources (business press, the internet, customers, and consultants).
- Always record information about competitor documents obtained by Xylem, such as:
  - names of the business and person who provided the document;
  - date the document was provided;
  - name of the Xylem colleague who received the document; and context in which the information was disclosed.
- Always make sure that emails discussing the prices charged, announced price changes (or contemplated price changes), production activities and decisions, and other competitive activities of competitors clearly indicate the source for that information.
- Always contact your Legal business partner prior to sharing competitively sensitive information, and anonymize and aggregate sensitive, non-public information.
- Always include the source information for competitive information reflected in email attachments, summaries, charts, or presentation slides.

### Never:

- Never solicit or obtain competitively sensitive information directly from competitors without pre-approval.
- Never solicit competitively sensitive information from third parties (customers, distributors, suppliers, etc.).
- Never provide Xylem's competitively sensitive information to a non-competing third party, and never consent to a customer or consultant sharing such information with any competitor.
- Never share a competitor's competitively sensitive information.
- Never use competitive data from an unknown source. This includes documents that arrive in unmarked envelopes and information conveyed by others who do not disclose their sources.
- Never solicit competitively sensitive information from prospective employees, new hires, or trade associations/trade shows.

### Where can I get more information?

- [Antitrust and Competition Law Compliance Policy](#)
- [Antitrust toolkit](#)



# Making deals and winning business

We win business on the strength of our solutions and services. We choose customers, suppliers, and other business partners who share our 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, other channel and business 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 Hub Site](#) 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 to comply with our [Political Activities Policy](#).

## 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 the Ethics and Compliance team. This would be considered an illegal kickback and should not be accepted.

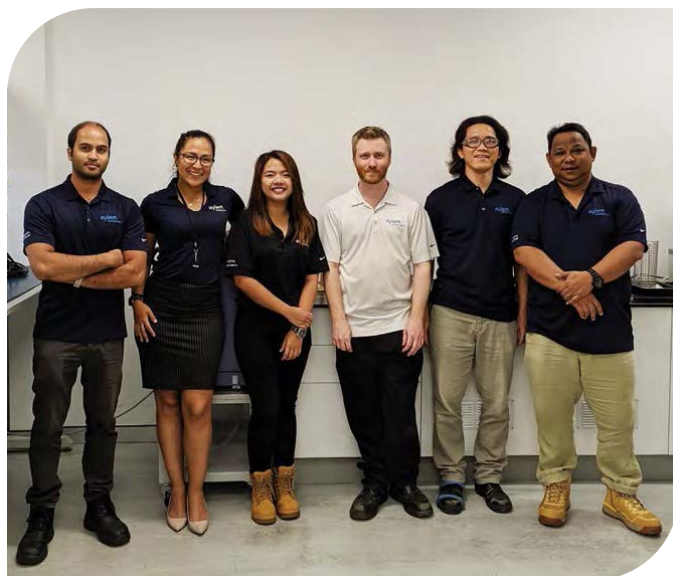
**What if my team wants to start work with a new distributor before the due diligence process is complete?**

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 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](#)
- [Anti-Corruption Due Diligence Process Hub Site](#)
- [Political Activities Policy](#)





### Gifts, hospitality, and customer travel

Our business partners are vital to Xylem's success and our relationships with them should be built on trust and integrity. Occasionally (and only when allowed by law and policies), offering or accepting gifts, entertainment, or hospitality can be appropriate, but we never offer, solicit or accept anything that could be perceived as a conflict of interest or be viewed as an attempt to improperly influence business decisions.

Our policies and guidelines set out the acceptable value limits, what needs to be pre-approved, and how to obtain pre-approval (local policies may be more restrictive). 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 to a business partner. Make sure charitable contributions and donations are allowed by our policy and obtain any required pre-approval. (See [community involvement and charitable donations](#).)

### Government officials

Pay close attention to our policies when entertaining or giving gifts to government officials. Because of anti-bribery laws, the thresholds are different and approvals are required. If you have questions, contact your Legal business partner 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?

It depends. Offering infrequent, moderately priced meals and hospitality to customers who are not government officials 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 pre-approved, appropriately documented, and also allowed under the customer's laws and policies. If you have doubts, discuss the situation with your Legal business partner or a member of the Ethics and Compliance team.

### Where can I get more information?

- [Anti-Corruption Policy](#)
- [Anti-Corruption Manual](#)
- [Gifts, Hospitality, Travel, and Charitable Contributions Policy](#)
- [Political Activities Policy](#)
- [Travel and Expense 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 [Business Partner and Supply Partner 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 suppliers are committed to ethical and lawful business practices outlined in the [Business Partner and Supply Partner 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?

- [Business Partner and Supply Partner Code of Conduct](#)
- [Global Procurement Policies](#)
- [Trade Compliance, Management, Import, and Export Policies](#)
- [Anti-Corruption Policy](#)



## 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, states, 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 including around communications which should always be done in writing through a work communications channel.
- Never attempt to influence a procurement decision through outside payments, favors, or gifts.
- Never pre-review or draft written procurement specifications unless requested in writing by the governmental customer from all potential bidders.

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 your Legal business partner 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 Management Hub Site](#)
- [Anti-Corruption Hub Site](#)
- [Gifts, Hospitality, Travel, and Charitable Contributions Hub Site](#)
- [Trade Compliance Hub Site](#)
- [Integrated Supply Chain & Global Procurement Hub Site](#)

# Safeguarding company interests

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- 35** How we maintain our reputation
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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 [External 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 or feedback about product quality or safety.

- [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, supply partners, 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](#).

- [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, supply partners, 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. 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, supply partners, 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, and follow our policies and procedures. 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, report the email as a phishing attempt.
- **Delete unneeded data.** 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 Xylem to increased risk. Follow our [Record Retention Policy and Schedule](#) 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 [Legal and Compliance team](#) is required before accessing the email account or reviewing the Internet activity of any active Xylem colleague.

## What if...

### What if I want to get new software installed?

Open a Xylem IT Service and 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 [Acceptable Use of Information Technology Policy](#).

### 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.

## Where can I get more information?

- [Acceptable Use of Information Technology Policy](#)
- [Record Retention Hub Site](#)

## Reporting issues

Report potential phishing attempts by using the button in the Outlook ribbon. Report suspicious cyber incidents and all other cybersecurity questions and concerns to [cyber.security@xylem.com](mailto:cyber.security@xylem.com).

# Ethical use of Generative Artificial Intelligence

When used ethically and responsibly, Generative Artificial Intelligence (Generative AI) can improve productivity, automate tasks, and enhance creativity. Unfortunately, if Generative AI is misused, it can result in harm to you, Xylem, or our business partners. Follow these guidelines to use Generative AI with integrity:

## Always:

- Use Generative AI applications in line with our Values, Code of Conduct, other policies, quality standards, and relevant laws.
- Filter out biases and discriminatory, harmful, misleading, or offensive language.
- Review and carefully verify content created by Generative AI before using it (Generative AI does not replace human judgment).

## Never:

- Use copyrighted material that you have not created or that is not owned by Xylem as an input to generate content.
- Input private or confidential information into public Generative AI tools (most public Generative AI tools do not guarantee data privacy).



## When using code generators:

- Ensure the code generator includes adequate privacy and confidentiality protections.
- Balance automation and human intervention. Leverage AI code generators to streamline routine tasks while preserving opportunities for creativity, critical thinking, and problem-solving on more complex or nuanced problems.
- Maintain human oversight and intervention throughout the code generation process.
- Review, modify, and validate AI-generated code through robust testing and code review processes to ensure AI-generated code meets Xylem standards.
- Integrate security practices into the code generation process.

For questions and more information see our Hub Site: [Responsible Use of Artificial Intelligence at Xylem](#).



## 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 record 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** the Ethics and Compliance team or your Legal business partner 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 Policy](#)
- [Intellectual Property Policy](#)
- [Data Privacy Policy](#)
- [Privacy Statement](#)
- [Records and Information Governance Retention Hub Site](#)

# Recordkeeping 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 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 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 Retention 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 the Ethics and Compliance team or your Legal business partner if you have questions.

## Where can I get more information?

- [Records and Information Governance Retention Hub Site](#)
- [Travel and Expense Policy](#)
- [Acceptable Use of Information Technology](#)
- [Revenue Recognition Policies](#)



# 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

**44** Community involvement and charitable donations

**45** Protecting our environment

**46** Supporting human rights





# 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.

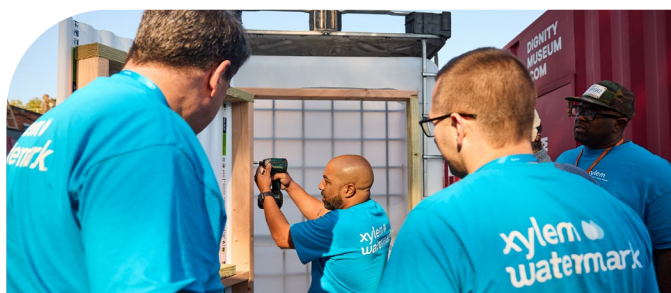
- **Learn** more about our corporate social responsibility initiatives and how you can play a role in advancing them.
- **Participate** in Xylem Watermark volunteer events and activities.
- **Volunteer** for community programs that speak to your personal passions and interests.

## Making charitable donations

As a company, we make charitable donations that promote causes that align with our purpose. 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** necessary pre-approval before making donations on behalf of Xylem.

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 enable healthy lives, help build resilient communities, and inspire and attract the next generation of leaders. 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](#)
- [Anti-Corruption Policy](#)
- [Anti-Corruption Manual](#)
- [Travel and Expense Policy](#)



# 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, and Safety Manager if guidelines are not being followed.
- Report any leak, spill, or other potential environmental issue.

## Where can I get more information?

- [Xylem Sustainability Report](#)
- [Environmental, Health, and Safety Hub Site](#)



## 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 the Environment, Health, and Safety team. We have procedures for safe disposal that ensure environmental health and safety of our colleagues and facilities.



# 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](#).)

## Where can I get more information?

- [Statement on Efforts to Combat Modern Slavery](#)
- [Conflict Minerals Policy Statement](#)
- [Human Rights Policy](#)
- [Global Procurement Policies](#)
- [Business Partner and Supply Partner Code of Conduct](#)

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 [Business Partner and Supply Partner Code of Conduct](#) and model our ethical business practices.





# 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 workplace where our colleagues throughout the organization act responsibly and with integrity and feel empowered to speak up when they suspect that our Code of Conduct 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 multifaceted program. The team members are subject matter experts in investigations, anti-corruption/bribery, data privacy, training, 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.



Innovate, lead, and deliver with integrity.

## Where can I get more information?

- [Ethics and Compliance Hub page](#)
- [Ethics Every Day Viva Engage site](#)



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# Xylem l'zīlām!

- 1) the tissue in plants that brings water and nutrients upward from the roots.
- 2) a leading global water solutions company.

Xylem Inc. is a leading global water solutions company dedicated to advancing sustainable impact and empowering the people who make water work every day. Xylem connects diverse capabilities and innovative technologies to provide tailored solutions across the entire water cycle. From moving, treating, and measuring water to optimizing and maintaining water systems, Xylem collaborates with customers to solve their most critical challenges. Together, through partnerships with utilities, industrial manufacturers, building operators, and communities, we are building a more water-secure world.



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Many of the photos in the Code of Conduct were sourced from Xylem employees. We greatly appreciate these skilled photographers and their generous contributions.