



The Clorox Company

Modern Slavery Act & Supply Transparency Statement

The Clorox Company (together referred to as "Clorox" or the "Company") has put in place various programs to manage the risks of slavery and trafficking throughout the Clorox operations and supply chain.

This statement applies to all of Clorox's operations and is being made in accordance with the UK Modern Slavery Act, Australian Modern Slavery Act, and California Transparency in Supply Chains Act. It has been approved by the board of directors and signed by at least one director of The Clorox International Company, Cbee (Europe) Limited, Clorox Holding Pty Limited, and Clorox Australia Pty Limited.

Our Business

The Clorox Company is a leading multinational manufacturer and marketer of consumer and professional products with fiscal year 2020 net sales of \$6.7 billion and more than 8,800 employees worldwide as of June 30, 2020. Clorox markets some of the most trusted and recognized consumer brand names, including its namesake bleach and cleaning products, Pine-Sol cleaners, Liquid-Plumr clog removers, Poett home care products, Fresh Step cat litter, Glad bags, wraps and containers, Kingsford charcoal, Hidden Valley dressings and sauces, Brita water-filtration products, Burt's Bees natural personal care products, RenewLife digestive health products, and Rainbow Light, Natural Vitality, Neocell and Stop Aging Now dietary supplements. The Company also markets to professional services channels, including infection control products for the healthcare industry with the Clorox Healthcare brand and Clorox Commercial Solutions brand. More than 80% of the Company's sales are generated from brands that hold the No. 1 or No. 2 market share positions in their categories.

Clorox is a long-time signatory to the United Nations Global Compact, and is committed to ensuring that Clorox manufacturing facilities around the world comply with, and often exceed, what is required by application laws. We are clear about our expectations in the areas of human rights and labor, respectful treatment and equal opportunity, health and safety as well as business conduct and ethics, which are consistent with the Ten Principles of the UNGC.

For the purposes of this statement, Cbee (Europe) Limited is the local operating company in the UK within the Clorox group and Clorox Australia Pty Limited is the local operating company in Australia within the Clorox group. They are companies registered pursuant to local requirements. These companies' principal activity includes the distribution and marketing of a range of well-known branded consumer and professional goods to customers, as sourced from Clorox manufacturing facilities or overseas business partners.

Our Supply Chain

The Company purchases products, such as raw materials, processed ingredients, packaging and contract manufactured goods, from numerous domestic and international suppliers, some of which provide sole-sourced or single-sourced goods. The Company generally utilizes supply contracts to help ensure availability and a number of forward-purchase contracts to help reduce the volatility of the pricing of goods and services needed in its operations.

To address risks of modern slavery, the Company sets expectations and standards, works with its suppliers and business partners to assess whether they meet those expectations, and holds regular discussions with suppliers (and site visits, where possible) and seeks third party certified ingredients where applicable and feasible to ensure engagement on modern slavery issues. In addition to the above, Clorox's system for compliance includes our policy and approach to human rights as explained in this modern slavery statement, our Code of Conduct and associated information and training, the implementation and engagement with our suppliers to promote compliance with our Business Partner Code of Conduct, the Clorox Compliance Hotline and our Responsible Sourcing and Sustainability Program.

Clorox Code of Conduct

Clorox has a Code of Conduct ("Clorox Code") that describes Clorox's expectation that the Company and its employees recognize and promote human rights on a global basis. Grounded in the United Nations Global Compact and International Labor Organization Declaration on Fundamental Principles and Rights at Work, the Clorox Code states that Clorox does not condone the exploitation, physical punishment, abuse, trafficking or involuntary service of children and others and prohibits the use of forced or illegal labor.

Clorox proactively communicates its Code and compliance program to employees through various methods, including but not limited to providing employees with regular training regarding compliance with the Clorox Code (including segments on modern slavery) together with information on the company's corporate intranet, posters, flyers and periodic awareness campaigns. Managers are encouraged to have regular discussions with those under their supervision about the Clorox Code and Clorox policies and the importance of compliance. Our Code is also publicly available on our website.

Clorox Business Partner Code of Conduct

Clorox also has a Business Partner Code of Conduct ("Business Partner Code") available on our website and provided in bilateral discussions and contractual terms that addresses business practices of third-party business partners, including suppliers, distributors, consultants, joint ventures, licensees, and other business partners ("Business Partners"). The Business Partner Code contains specific provisions addressing the issues of human rights and labor. Among other guidance, the Business Partner Code makes clear that Business Partners must evaluate and address risks of human trafficking and slavery and not produce goods or services using forced, bonded, indentured, involuntary convict or compulsory labor, and comply with applicable laws.

Clorox expects Business Partners to adhere to the principles of the Business Partner Code, and strives to ensure its strategic Business Partners are in compliance with its principles through agreement or

certification (either in a contract and/or a Business Partner Code self-certification form) and/or by assessing their public commitments, codes and policies. Suppliers are expected to designate management staff to monitor their factories, production facilities, business operations and their compliance with the Business Partner Code. Clorox's supply agreements also contain representations that Business Partners are in compliance with all applicable federal, state and/or provincial, regional, municipal, and local laws, codes, regulations, rules, ordinances, decrees, permits, registrations and orders, which include laws addressing human trafficking and slavery. In addition, Clorox and/or designated third-parties may visit and assess Business Partners to ensure compliance with the Business Partner Code, including but not limited to compliance with the prohibition on slavery and human trafficking. Clorox also requires in the Business Partner Code that materials incorporated into Clorox's products comply with the laws regarding slavery and human trafficking of the country or countries in which they are doing business.

Clorox Compliance Hotline

Clorox operates a confidential hotline ("Compliance Hotline") administered by a third party that, where permissible under local laws, is available to all employees, directors and contractors, as well as Business Partners and their employees or subcontractors.

The Compliance Hotline allows individuals to report suspected illegal or unethical behavior, including suspected issues of slavery or human trafficking in either Clorox's own business or its supply chains. Contact details are provided in the Clorox Code and Business Partner Code, including international toll free hotline numbers for numerous jurisdictions, including the UK and Australia.

Clorox encourages individuals to report potential issues to assist it in promptly identifying any potential risks in its supply chain. Clorox also offers individuals several channels to do so, including by reporting to their manager, Human Resources, or Legal Services at Clorox or anonymously through the Compliance Hotline. Clorox employees who do not act promptly to report noncompliance matters may be subject to disciplinary action. As stated in the Clorox Code and the Business Partner Code, Clorox strictly prohibits retaliation against anyone who in good faith reports suspected misconduct. All anonymized Compliance Hotline reports are made available to senior leadership, including the Clorox board of directors

The Company investigates these reports, including reports of potential modern slavery, and addresses remediation, as appropriate.

Responsible Sourcing & Sustainability Program

Finally, as part of its Responsible Sourcing & Sustainability program, Clorox evaluates (and may use third parties to evaluate) its supply chains for risk, including as to modern slavery. For example, in the UK and Australia (as with other countries), third party manufacturers or suppliers selected and managed in consultation with global legal, procurement, and other applicable controls teams, as applicable, following diligence checks as well as review of contractual commitments in supply agreements, and providing training, where necessary or appropriate.

When conducting supplier diligence, our system includes using a technology solution to continuously monitor global suppliers and certain other Business Partners and ensure automated detection and alerting in real time of supply chain risks, including human trafficking and slavery.



Clorox has conducted targeted training for its product supply leadership, internal team members with direct responsibility for supply chain management, and train select business partners to identify and address risks of slavery and trafficking in its supply chain.

In addition to information monitoring, Clorox supports its Business Partner Code with site visits, self-assessments and third-party audits. Clorox is an active member of AIM-Progress and the Supplier Ethical Data Exchange (Sedex) through which it has started engaging its Business Partners in Sedex Self-Assessment Questionnaires and Sedex Members Ethical Trade Audits. Clorox supports mutual recognition platforms for audits to encourage its business partners to focus on remediation and improvements rather than re-audit by multiple customers. In the event concerns arise, Clorox will investigate the matter and take appropriate actions to address the issue.

A Business Partner's ability to meet or exceed these standards is taken into account by Clorox when making procurement decisions and decisions whether to continue working with Business Partners. Where suppliers are not able to satisfy Clorox that they have appropriate risk management controls in place, the Company may take further action, such as engaging supplier senior management, implementing a remediation plan or suspending the services.


Continuous Improvement

As a Company, Clorox continues to monitor the effectiveness of our programs to manage the risks of modern slavery through our supply chain.

For example, the worldwide Covid-19 pandemic began towards the end of the 2020 fiscal year, and continues at the time of publication. Clorox is evaluating whether the pandemic could alter its modern slavery and human trafficking risks. We also endeavor to work with non-governmental agencies, such as ingredients supply oversight bodies, and intermediary suppliers to affect improvements in complex indirect global supply chains where Clorox lacks direct relationships.

We are committed to continuous improvement, and over the next year our focus will be on continuing to monitor further legislative or regulatory development, reviewing and enhancing our programs and policies to account for applicable laws or business circumstances, continuing to focus on the engagement of business partners, and monitoring complaints made to applicable regulatory organization as well as through our Compliance Hotline.

We will continue to report on progress on an annual basis.

 Date: 12/17/2020

Angela Hilt, Senior Vice President and Chief Legal Officer

Signed following approval by The Clorox International Company Board of Directors.

Felipe Toledo

12/21/2020

Date: _____

Felipe Eduardo Toledo Acuña, Director

Signed following approval by Clorox Australia Pty Ltd Company Board of Directors.

Signed following approval by Clorox Holding Pty Limited Company Board of Directors.

Giles Malone

12/21/2020

Date: _____

Giles Malone, Director

Signed following approval by Cbee (Europe) Limited Board of Directors.