



A Message from Benno Dorer

Chairman and Chief Executive Officer



Corporate responsibility has been a cornerstone of The Clorox Company since it was founded in 1913. A commitment to our core value of “doing the right thing” guides our day-to-day operations and is an important part of our long-term success.

Operating honestly and ethically is a commitment we make every day to each other and to our shareholders, business partners, consumers, customers, suppliers and communities. Our Code of Conduct establishes our legal and ethical standards of behavior and business practices, and serves as a guide for everyone in the company.

Just as we are all leaders in growing our business, we all must be leaders in living the fundamental principles that guide how we conduct our work. We have the responsibility to speak up and report any violation of our Code of Conduct or Clorox policies. Reports of misconduct are reviewed, investigated (if appropriate) and treated confidentially to the extent reasonably possible. Retaliation against anyone who, in good faith, reports suspected misconduct is strictly prohibited.

Please take the time to read and understand our Code of Conduct, Clorox policies and core values, and apply them to your everyday business activities. In doing so, you’re helping to ensure that Clorox remains a company rooted in integrity and trust — a source of pride for all of us and a driver of our continued success.

A handwritten signature in black ink, appearing to read "Benno Dorer". The signature is fluid and cursive, with a large initial "B" and "D".

Benno Dorer
Chairman and Chief Executive Officer

Contents

1 Why We Have a Code and What It Means to All of Us

- p. 2 **Personal Integrity: The Foundation of Corporate Integrity**
- p. 3 **Ethical Role Models: Leaders' and Managers' Responsibilities**
Discipline for Code of Conduct Violations

2 Speaking Up: Asking for Guidance and Voicing Concerns

- p. 5 **We Each Have a Responsibility to Ask Questions**
Reporting Misconduct
- p. 7 **Our Nonretaliation Policy: Zero Tolerance for Retaliation**
What Is Retaliation?
Investigating Reports of Misconduct
Participating in an Investigation

3 Doing the Right Thing: How We Uphold the Code of Conduct and Our Core Values

- p. 9 **Our Core Values**

Do the Right Thing

- p. 10 **General Business Ethics:** *We exercise honesty and fairness in everything we do.*
Corporate Opportunities: *We always act in the best interest of Clorox, not for personal profit.*
Prohibited Stock Transactions: *We do not engage in prohibited stock transactions.*
- p. 11 **Corruption and Bribery:** *We refuse to make or take bribes or to make questionable payments regardless of where we are located or with whom we do business.*
- p. 12 **Gifts, Meals and Entertainment:** *We know and follow the Clorox gifts and entertainment standards, and do not accept or give inappropriate gifts or hospitality.*
- p. 13 **Political Contributions:** *We do not use Clorox funds or assets on behalf of a political party or candidate, except as expressly approved by Clorox.*

Take Personal Ownership

- p. 14 **Public Disclosure:** *We are accurate and timely in our communications about our business performance.*
Protection and Proper Use of Clorox Assets: *We use technology and company resources responsibly.*
Insider Trading: *We appropriately and lawfully comply with insider trading laws.*
- p. 15 **Use of Proprietary Information and Trade Secrets:** *We are responsible for protecting the intellectual property and protected information entrusted to us.*
Use, Security and Monitoring of Systems: *We follow all Clorox information technology security standards and procedures.*
Antitrust and Competition Laws: *We follow antitrust and fair competition laws.*

Work Together to Win

- p. 16 **Interference with an Audit:** *We cooperate with all audit requests.*
Conflicts of Interest: *We avoid conflicts of interest or even the appearance of a conflict.*
- p. 17 **Confidential Information and Privacy:** *We take the appropriate steps to safeguard confidential information and trade secrets.*
Workplace Behavior: *We value and promote both equal employment opportunity and inclusion, and do not tolerate discrimination, intimidation or harassment.*
- p. 18 **Treatment of Employees and Others:** *We respect each other and maintain fairness in relationships.*
Relationships with Business Partners (including Distributors, Suppliers, Consultants and Others): *We engage in fair and ethical dealings.*

Stretch for Results

- p. 19 **Clorox Records and Money:** *We are responsible for the accuracy of our records and financial statements.*
Records Management: *We manage business records in accordance with applicable retention requirements.*
- p. 20 **Social Media and Other Online Activity:** *We are responsible in our use of social media.*
- p. 21 **Environmental, Health and Safety Laws and Regulations:** *We maintain a safe and healthy work environment.*
Human Rights: *We recognize and promote human rights on a global basis.*
Global Trade: Export Controls, Restricted Countries, Imports and Boycotts: *We follow and abide by applicable global trade laws.*





Why We Have a Code
and What It Means
to All of Us

Personal Integrity: The Foundation of Corporate Integrity

Each of us is personally responsible for supporting our core values, which require compliance with the law as well as ethical conduct. Clorox is strongly committed to doing business ethically and in compliance with all applicable laws. We have policies, processes and training in place to support ethical and legal decision making.

Personal integrity, practiced on a daily basis, is the foundation of corporate integrity. Our ethical and legal standards of conduct are rooted in the Clorox Code of Conduct (this "Code"). This Code defines what we can expect from each other and guides how we report and handle alleged violations of these standards.

Our Code applies to us all. We are all expected to act with uncompromising honesty and integrity at all times. We must demand of ourselves and of each other the highest standards of individual and corporate integrity. Each of us, including our chief executive officer and other executive officers, directors and employees of Clorox or any of our wholly owned subsidiary companies worldwide (collectively "Clorox"), is required to strictly abide by our Code, our policies and applicable laws that apply to business activities on behalf of Clorox.

Additionally, we have a separate Business Partner Code of Conduct that outlines standards and expectations of our business partners (including our distributors, suppliers, consultants and joint ventures), which can be found [here](#). We expect our business partners to demonstrate high standards of ethical business conduct.

It is Clorox policy to conduct our business in accordance with the applicable laws of the United States and other jurisdictions in which we do business and with high ethical standards of business practices. In many instances, our Code commits us to follow a higher standard of ethical conduct than what is required by law. Employees and directors will, at a minimum, abide by both applicable laws and the standards of conduct in this Code. The Clorox Board of Directors is the only party who may waive any part of this Code, always acting within the scope of applicable law. Waivers for executive officers and directors will be publicly disclosed.

To remind us about our obligations under our Code, we are all regularly required to complete a questionnaire about compliance with our Code's principles. Our Executive Vice President - General Counsel and Corporate Affairs is responsible for providing our Code to our directors. Managers are expected to have regular discussions about our Code and encourage everyone under their supervision to comply with our Code and Clorox policies. Our Code is also publicly available.

Our Code sets forth the fundamental principles and some of the key policies and procedures that govern Clorox's business. It is not a complete compilation of all company guidelines or policies. We are expected to know and comply with all company guidelines or policies, whether or not reflected in the Code.

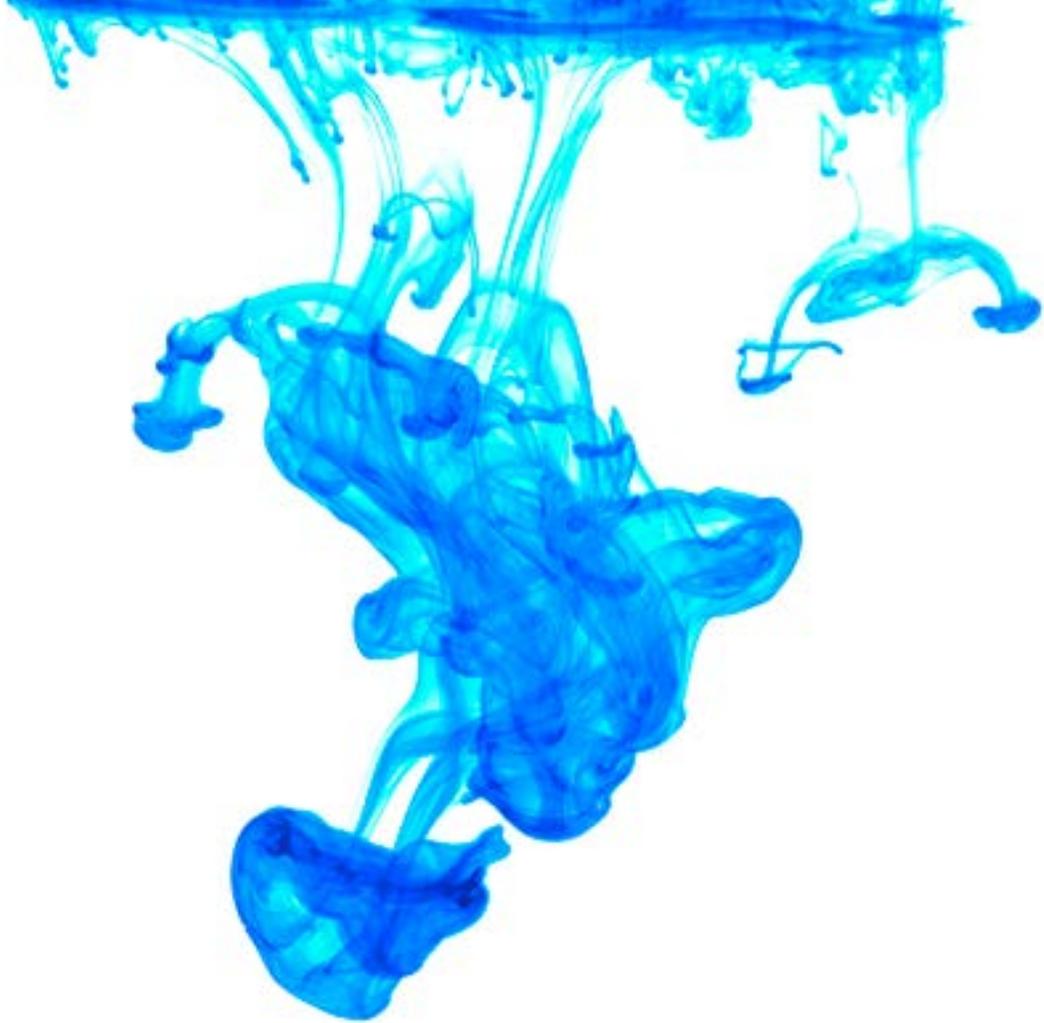


Ethical Role Models: Leaders' and Managers' Responsibilities

Leaders and managers are expected to serve as ethical role models for everyone by exemplifying the Clorox values and leadership traits at all times. If you are a Clorox leader or manager, you have a special responsibility to lead with integrity and take affirmative steps to influence your team members to do the same. This requires a visible commitment to promote ethical conduct and communicate the importance of our Code.

Leaders and managers must strive to create a positive work environment in which everyone feels comfortable asking for help and raising concerns about compliance with the Code in accordance with the directions set forth in this Code. Leaders must also be alert to any situations or actions that may violate the letter or spirit of the Code, violate a Clorox policy or damage Clorox's reputation. It is important to act quickly to address such situations. When leaders and managers receive reports of a situation that is unethical, illegal or potentially damaging to Clorox's reputation, or suspect that one exists, they should promptly notify appropriate personnel and work to resolve the issue, as described in this Code.

Leaders and managers who know about, or should know about, misconduct and do not act promptly to report and correct the situation will be subject to disciplinary action. Leaders and managers who suspect or receive reports of potential noncompliance with our Code should not perform any investigative or other follow-up steps on their own. Leaders and managers who become aware of suspected misconduct should not contact the person suspected of the misconduct and should immediately follow the Clorox reporting guidelines to ensure that a complete and proper investigation takes place promptly. Leaders and managers must not retaliate or tolerate retaliatory acts against Clorox employees or business partners who in good faith report an alleged violation of our Code, Clorox policies or the law to Clorox or the government, and leaders and managers are expected to clearly communicate to others our "no retaliation" policy, as set forth in this Code.



Discipline for Code of Conduct Violations

Subject to applicable law, individuals who violate our Code and Clorox policies are subject to appropriate discipline. Disciplinary measures will vary depending on the seriousness of the violation and individual circumstances. Possible disciplinary sanctions include, but are not limited to, written warnings, suspension and termination. In appropriate circumstances, Clorox will consider taking legal action or referring matters to public law enforcement authorities for possible prosecution.



Speaking Up:
*Asking for Guidance
and Voicing Concerns*

We Each Have a Responsibility to Ask Questions

We have a responsibility to ourselves, our co-workers and Clorox to conduct business legally and ethically. We should be alert to activities going on around us and speak up if we suspect illegal or unethical conduct by any Clorox employee, contractor, vendor, supplier, director, customer or other person working for or on behalf of Clorox.

Sometimes it might seem easier to “look the other way,” but doing nothing is, in itself, an action that can have serious consequences for us as individuals and for Clorox. Participation and commitment to monitoring the integrity of our business conduct is instrumental in sustaining our ethical culture. If we do not speak up, Clorox cannot address the problem.

No code of conduct can cover every business situation that may require an ethical or legal decision. Consequently, if we suspect that someone is behaving illegally or unethically, each of us is responsible for seeking guidance regarding our Code, Clorox policies and applicable laws when necessary. Speaking up and seeking advice is not a responsibility that can be delegated to others. If we have questions about the law, our Code or our policies, or if we face situations not specifically addressed in our Code, we should seek advice from our manager or local supervisor, Human Resources or Legal Services before taking any action.

Additionally, anyone may contact the Clorox Compliance Hotline with questions about business conduct or to report concerns.

Reporting Misconduct

If we suspect that someone is behaving illegally or unethically, or that a violation of the Code has occurred, each of us is responsible and should report it according to our Clorox reporting procedures:

A. We should immediately bring it to the attention of our local supervisor or any member of local management, as appropriate.

B. If for any reason there is discomfort bringing the concern to local management, Human Resources or Legal Services, or if it is felt that the concern has not been adequately addressed, reports may be made through the Clorox Compliance Hotline, a confidential hotline administered by an outside third party, using the contact information provided below.



Compliance Hotline

Clorox Company Compliance, PMB 3767
13950 Ballantyne Corporate Place
Charlotte, NC 28277, USA
1-888-9CLOROX (1-888-925-6769)
cloroxhotline.com

Telephone Numbers:

United States, Canada and Puerto Rico:

1-888-9CLOROX (1-888-925-6769)

The following countries have local direct dial numbers for the Hotline:

Argentina:	0800-555-1352
Australia:	1-800-08-7065
China:	400-882-2048
Colombia:	01-800-912-0580
Dominican Republic (collect call):	1-704-526-1175
Hong Kong:	800-96-1701
Malaysia:	1-800-81-8498
Mexico:	001-877-978-0052
New Zealand:	1-050-853-6017
South Africa:	800-44-4460
United Kingdom & Northern Ireland:	0808-234-3903

Two-step toll-free dialing is used for these countries:

Chile:	Step #1: 800-800-288; Step #2: 888-925-6769
Costa Rica:	Step #1: 800-228-8228; Step #2: 888-925-6769
Ecuador:	Step #1: 1-800-225-528; Step #2: 001-888-925-6769
Egypt:	Step #1: 2510-0200 or 02-2510-0200; Step #2: 888-925-6769
Germany:	Step #1: 0-800-225-5288; Step #2: 888-925-6769
Korea:	Step #1: 00-309-11; Step #2: 888-925-6769
Panama:	Step #1: 800-0109; Step #2: 888-925-6769
Peru:	Step #1: 0-800-50-288; Step #2: 888-925-6769
Philippines:	Step #1: 10511; Step #2: 001-888-925-6769
Spain:	Step #1: 900-99-0011; Step #2: 888-925-6769
United Arab Emirates:	Step #1: 8000-021 or 8000-555-66; Step #2: 888-925-6769
Uruguay:	Step #1: 000-410; Step #2: 888-925-6769

Employees calling from all other countries should consult the international toll-free number with the calling card dialing instructions listed on CloroxWeb.

Clorox Compliance Hotline

Reports of potential misconduct can be made directly to your manager, Human Resources or Legal Services, or by anonymously contacting the Compliance Hotline.

HOW TO REPORT



Compliance Hotline

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Dominican Republic (collect call):	1-704-526-1175
Hong Kong:	800-96-1701
Malaysia:	1-800-81-8498
Mexico:	001-877-978-0052
New Zealand:	1-050-853-6017
South Africa:	800-44-4460
United Kingdom & Northern Ireland:	0808-234-3903

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C. In addition to the reporting mechanisms described above, if the misconduct relates to an accounting, financial, banking, internal control, auditing, bribery, anti-corruption or antitrust/competition matter, we may directly contact Ivor Nanton, Vice President – Internal Audit, any auditor in the Clorox Internal Audit department or any attorney in Legal Services.

D. Potential business misconduct may also be reported to the Nominating and Governance Committee of the Board of Directors or, if the report relates to an accounting, internal control or auditing matter, to the Audit Committee of the Board of Directors.

E. The Clorox Compliance Hotline program is currently being updated. Some hotline numbers will change, and the company is adding hotline numbers in new locations. The policy will be updated as numbers change.

Our Nonretaliation Policy: Zero Tolerance for Retaliation

As a Company, we do not tolerate retaliation against anyone who raises an issue or concern in good faith. We take claims of retaliation seriously — anyone found to have committed a retaliatory act is subject to disciplinary action, up to and including termination. If you or someone you know is the victim of retaliation, report it immediately to any of the Clorox resources available to us for reporting.



What Is Retaliation?

Retaliation means taking a negative action against a person for reporting in good faith suspected misconduct to Clorox or the government or for participating in or cooperating with a Clorox or government investigation. It can include conduct such as (a) threats of physical harm, (b) threats of or actual termination of employment, (c) less desirable work assignments, (d) managerial or co-worker abuse, (e) exclusion from work activities or (f) negative impact on salary or benefits. This does not mean, however, that managers cannot take appropriate employment-related action, including disciplinary action, in the usual scope of their duties and based on valid performance-related factors.

When we in good faith seek advice, raise a concern or report suspected misconduct, we are following the spirit of our Code and doing the right thing. We should all feel comfortable reporting suspected misconduct without fear of losing our jobs or other harm.

Investigating Reports of Misconduct

All reports of possible violations of applicable law, this Code or Clorox policies are promptly evaluated and investigated where appropriate. Depending on the circumstances, the investigation may be conducted by managers or local supervisors, members of Legal Services, Human Resources, Internal Audit or an independent third party, as appropriate. All reports of potential misconduct will be handled with sensitivity, discretion and confidentiality to the extent allowed by the circumstances and the law. This means that information regarding an investigation will be shared with those who have a “need to know” for an effective investigation and follow-up, or as required by applicable law. When feasible, the individual making the report is informed when the investigation has been concluded.

The Board of Directors, as a whole or through one of its committees, is informed of hotline reports and other appropriate reports of suspected business misconduct and the results of the investigations of those reports. The Board of Directors, as a whole or through one of its committees, may request managers, local supervisors or the General Counsel to conduct an investigation or may, in its discretion, retain its own advisors to advise or investigate reports.

Participating in an Investigation

Clorox is committed to ensuring that those of us reporting violations or participating in investigations are treated fairly. Any complaint of retaliation will be promptly investigated.

It is a violation of our Code to retaliate against anyone for cooperating with or participating in Clorox or government investigations involving possible violations of the law, our Code or other Clorox policies, even if the investigations find no evidence of misconduct. Anyone who retaliates against a person for participating in an investigation will be subject to disciplinary action, including termination.

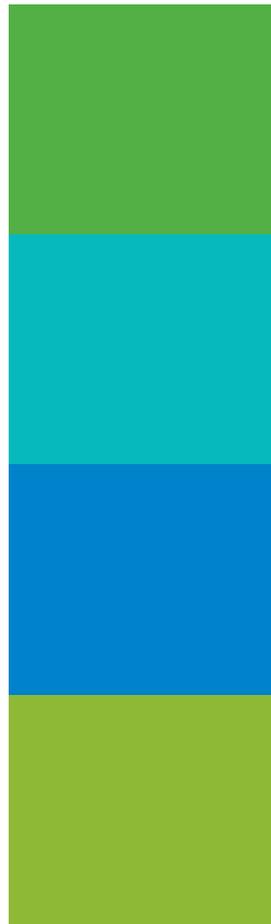


Doing the Right Thing:
*How We Uphold the
Code of Conduct and
Our Core Values*

Our Core Values

By following our Code, as well as our core values and the principles that inspire them, we can establish and maintain an ethical culture in our company, where integrity and respect for others lead all our relationships, including our work with our business partners and in the communities where we do business.

At Clorox, our core values are an intrinsic part of who we are as a company and as individuals. They are a commitment we make to each other and to our shareholders, business partners, consumers, customers, suppliers and communities that we will always act with integrity and strive to achieve excellence.



Do the Right Thing

The long-term health of the company depends on our integrity, on the way we treat the environment and on always making decisions that uphold the high standards and ethics that are the foundation of our culture.

Take Personal Ownership

Progress is driven by those who own their results and make the process to achieve those results as fast, simple and effective as it can be. Taking personal ownership recognizes that each of us has a responsibility and a critical role to ensure we deliver excellent results and meet our goals.

Work Together to Win

Success depends on productive collaboration among Clorox people and between Clorox people and our business partners. While individual ownership and contributions make a difference, teamwork is equally important to achieving great results.

Stretch for Results

Our success is measured by our ability to consistently win in the marketplace. Setting high expectations, pushing beyond the ordinary and creating innovative solutions are some of the ways we stretch for results.

General Business Ethics

We exercise honesty and fairness in everything we do.

Regardless of the situation, each of us — employees and directors — is expected to make decisions with honesty and integrity in everything we do. We should not make misleading statements or omissions of any kind. Any unethical or deceitful business practices will not be tolerated.

Corporate Opportunities

We always act in the best interest of Clorox, not for personal profit.

As Clorox employees and directors, we must always act in the best interests of Clorox, and we have a responsibility to promote Clorox's interests when opportunities to do so arise. This means that we cannot take these opportunities for ourselves. Specifically, we must not (1) take personal advantage of opportunities discovered through the use of Clorox property or information, or through our positions at Clorox; (2) use Clorox property or information or our positions at Clorox for personal gain; or (3) compete with Clorox. We are each responsible to Clorox for advancing its legitimate business interests when the opportunity to do so arises. If potential business opportunities for Clorox come to our attention, we must notify our managers or Legal Services.

question

What is a "corporate opportunity"?

Q&A

corporate opportunity

answer

A corporate opportunity is a business opportunity that becomes known to an employee due to his or her position with the company, such as a potential investment or acquisition, or an opportunity to provide consulting, expert services or new technologies. We may not take advantage of corporate opportunities.



Prohibited Stock Transactions

We do not engage in prohibited stock transactions.

We may not engage in the following transactions in or related to Clorox securities: (a) short sales (selling Clorox securities we do not own); (b) those involving publicly traded options or other derivatives the value of which is tied to the company's securities, including trading in or writing puts or calls on Clorox securities; and (c) hedging transactions in Clorox securities. A hedging transaction is a financial transaction that limits your investment risk in Clorox's securities through the purchase of an opposite position in the market to ensure a certain amount of gain or loss on a trade. Examples of hedging transactions include pre-paid forward contracts and collars. It is also important to note that these restrictions do not just apply to us, but also to anyone who lives in our households (other than household employees), any corporation or other entity that we control or manage, trusts for which we are the trustee or in which we have a beneficial interest, and any Clorox securities over which we have voting power or dispositive power. For questions about specific transactions, please contact Legal Services. All employees and directors are expected to review our Insider Trading Policy.

Corruption and Bribery

We refuse to make or take bribes or to make questionable payments regardless of where we are located or with whom we do business.

Clorox strictly forbids giving, soliciting, offering and accepting bribes, kickbacks and other prohibited payments by its employees, directors and business partners. We abide by anti-corruption laws everywhere we do business in the world, without exception. These laws include the U.S. Foreign Corrupt Practices Act (FCPA) and the UK Bribery Act 2010, as well as all applicable anti-corruption and anti-bribery laws in each country in which we do business.

We prohibit offering, paying or authorizing bribes or anything of value (including cash, gifts, stock, travel expenses, meals, entertainment, gifts, discounts, offers of employment, products, personal favors or any other direct or indirect benefit) to a government official, regardless of rank or title, to influence performance of official functions, or to obtain or retain business. No meals, entertainment, gifts or gratuities may be offered or provided to any government official except as explicitly provided in the Global Gifts, Entertainment & Hospitality Policy. No travel or other expenses for government officials may be provided prior to mandatory review by Legal Services. Entering into any business arrangement with government officials, including for consulting or spokesperson work, also requires prior mandatory review by Legal Services. In addition, because "facilitation payments," which are payments made to low-level foreign officials to ensure or speed up the performance of routine, nondiscretionary duties or actions, are illegal in many countries and very narrowly applicable in the countries that do permit them, Clorox prohibits the payment of facilitation payments everywhere.

Government officials include anyone with any affiliation with a government department, agency or instrumentality, at any level. This includes elected and appointed government officials, government employees at any level, political candidates, political party officials and members of public international organizations such as the United Nations or an immediate family member of any of the above. Employees of state-owned or state-controlled enterprises (including hospitals, universities and research institutes) should also be considered government officials for the purposes of our Code and Clorox's policies.

Commercial bribery, or payments or gifts to any private individual to induce that person to improperly perform any activity such as buying our products, is also prohibited. Additionally, any payments, offers or authorization to pay money or anything else of value that are unlawful under local laws in any country are prohibited.

It is very important that we do not engage business partners who will engage in corrupt activities on our behalf. Our [Business Partner Code of Conduct](#) requires our business partners to comply with all applicable laws, including anti-corruption laws, and the contracts we create with business partners should also reflect this requirement as appropriate. We cannot make any payment to a business partner if it will, or we suspect it will, be used for a prohibited

question

I need to obtain approval for a project as quickly as possible. The government employee I contacted has offered to speed up the process if I pay him a "small fee." May I make a small payment to a government employee to speed up the approval process?



answer

No. This type of payment is known as a "facilitation payment" and is prohibited by Clorox. You may not offer or pay any amount to government officials to facilitate government approvals even if it will speed up a project. You should notify your manager and Legal Services of this request for a facilitation payment. In certain cases, official payments paid directly to government agencies (not to government officials) for expedited services may be permissible, but check with Legal Services first.

payment. We may perform due diligence on our business partners to avoid working with parties engaging in corrupt practices.

It is important that we maintain accurate and transparent books and records. All payments to third parties must be appropriately recorded in financial records and should be properly supported.

Every one of us, regardless of the country in which we work, must adhere to these requirements, even where practices that violate these policies are expected or customary. Whether a payment is appropriate is not always clear. When in doubt, we should discuss the particular situation with our managers and Legal Services, particularly when our work involves government officials. More information regarding corruption, bribery and other prohibited conduct, as well as required anti-corruption contract language, is contained in our Global Anti-Corruption Compliance Policy.

Gifts, Meals and Entertainment

We know and follow the Clorox gifts and entertainment standards and do not accept or give inappropriate gifts or hospitality.

Clorox has a reputation for integrity. To preserve this reputation, we must not accept or give gifts that may influence or appear to influence business decisions or create a sense of obligation. We must never compromise our ability to make objective business decisions in the best interests of Clorox and must always avoid the appearance of bribery or impropriety.

Gifts, meals, entertainment and hospitality that exceed certain monetary thresholds — \$100 for gifts and \$250 for meals, entertainment and hospitality — require advance review by Legal Services and approval by a functional vice president (or other appropriate senior manager).

As a general matter, we may never accept or give gifts, meals, entertainment or hospitality that fit any of the following descriptions:

- Lavish, extravagant, illegal, inappropriate or of significant value
- Create a real or apparent sense of obligation
- Cash or cash equivalents, such as gift cards, coupons or stipends
- Given for the improper purpose of expecting anything in return, such as a favorable decision or execution of a contract

Gifts, meals, entertainment and hospitality may be accepted or given only if they are:

- Given for the proper purpose of strengthening business relationships or demonstrating products or services
- Reasonable under the circumstances, such as occasional modest meals, occasional attendance at ordinary spectator events or gifts of nominal value (e.g., promotional trinkets with the Clorox logo)
- Appropriate for the location and occasion
- Given openly and transparently
- Are in compliance with Clorox policies and all applicable laws

We must not accept or give gifts that may influence or appear to influence business decisions or create a sense of obligation.

question

I am interviewing companies that are bidding on a potential project. One of the bidders has offered to take me to the Super Bowl, all expenses paid. May I attend the game?

Q&A

gifts, meals and entertainment

answer

No. A trip to the Super Bowl is of significant value and may influence your decision to award the business to that company. To determine what types of gifts may be acceptable, you should contact your manager and Legal Services.

Gifts given to individuals and entities who are not affiliated with Clorox must be accurately reflected in our accounting records. We must never request any gifts, entertainment or hospitality. We must not accept or give gifts that may influence or appear to influence business decisions or create a sense of obligation. Special guidelines apply to gifts, meals and entertainment we give to non-U.S. government officials. Such gifts, meals and entertainment must also be compliant with local laws applicable to government officials and must be of an aggregate market value of less than US\$100 per individual government official in any six-month period. Gifts, meals and entertainment must not be given to family members or guests of government officials, except for reasonably priced meals where Legal Services has reviewed the circumstances in advance. All other gifts, as well as any travel or accommodations provided to government officials, must be reviewed in advance by Legal Services.

For more information on giving and accepting gifts, meals, entertainment and hospitality, as well as special rules on working with government officials, please consult the Global Gifts, Entertainment & Hospitality Policy.

Political Contributions

We do not use Clorox funds or assets on behalf of a political party or candidate, except as expressly approved by Clorox.

Clorox does not make, directly or indirectly, contributions of money or other things of value to any person, political party or governmental entity for the purpose of obtaining or retaining business. Clorox complies with all laws and regulations governing campaign contributions in any federal, state or local election, in any country. We are each free to use our own funds to make individual political contributions in accordance with applicable law. Clorox will never reimburse you, in any form, for a political contribution that you make, even if a political contribution is purportedly made on behalf of Clorox. More detailed information regarding our policies and practices governing political contributions is contained in applicable policies, including the Political Participation Policy.

question

I have a friend who is running for political office. Is it OK for me to help her with her campaign?



answer

Yes. Just make sure you do not use The Clorox Company's name, our brands' names or any company assets (including Company time or resources) to advance the campaign.

Clorox complies with
all regulations
governing campaign
contributions.

Public Disclosure

We are accurate and timely in our communications about our business performance.

All of our public communications, including filings with the Securities and Exchange Commission, must be accurate, timely and understandable. If we become aware of any material information that may make our public disclosure misleading or inaccurate, we must promptly bring that information to the attention of our manager or the Executive Vice President - General Counsel and Corporate Affairs.

Protection and Proper Use of Clorox Assets

We use technology and company resources responsibly.

All employees and directors are expected to protect Clorox assets and use those assets efficiently and appropriately. Theft, carelessness, misuse and waste have a direct impact on our profitability. Clorox assets should be used only for legitimate business purposes.



Q&A insider trading

question

Sometimes my friends and family ask me about buying Clorox stock. May I tell them what I know about our business and suggest they buy stock?

answer

No. If a friend or relative buys or sells stock based on nonpublic information that you give him or her, both of you could be liable for violation of securities laws. Furthermore, you could be in violation simply for sharing material nonpublic information, regardless of whether or not he or she uses it or benefits from it.

Insider Trading

We appropriately and lawfully comply with insider trading laws.

The law prohibits insider trading — that is, buying or selling a company’s stock at a time when an individual has “material nonpublic information” about that company. Material nonpublic information is information that is not generally known or available to the public that is reasonably likely to be considered by a reasonable investor as important in making an investment decision to buy, hold or sell securities. One way to determine what is material nonpublic information is to consider how it impacts you. If the information makes you want to buy, sell or hold stock, it is likely to have the same effect on others.

If we have access to material nonpublic information about Clorox or another company, we may not profit financially by buying or selling or in any other way dealing in Clorox securities or the securities of another publicly traded company to which the material nonpublic information relates. This prohibition includes passing on material nonpublic information to another person or suggesting that they buy or sell a company’s securities while you are aware of material nonpublic information about that company. This practice, known as “tipping,” also violates the securities laws and can result in the same penalties as engaging in insider trading directly, even if we do not receive any money or derive any benefit from the trade. We may not communicate any material nonpublic information to anyone else until the information is publicly disclosed.

For questions about specific transactions, please contact Legal Services. All employees and directors are expected to review our Insider Trading Policy.

Use of Proprietary Information and Trade Secrets

We are responsible for protecting the intellectual property and protected information entrusted to us.

Clorox trade secrets and other proprietary information are valuable assets. Protecting these assets, including maintaining their secrecy, is extremely important to Clorox's continued success. Trade secrets include data or information that is treated as secret and that is unavailable to those outside Clorox except under confidentiality agreements. Proprietary information includes data or other information that has been developed or assembled on Clorox's (or a third party's) time or at Clorox's (or a third party's) expense and is nonpublic or not easily determined or re-created by others.

No one should share Clorox or third-party proprietary information or trade secrets with anyone outside or within Clorox who is not authorized to receive and does not have a business need to receive that information. Additionally, no one should solicit or accept from anyone outside Clorox any proprietary information or trade secrets of another company or third party. We have no interest either in receiving or using any proprietary information or trade secrets of other companies or third parties except under an appropriate agreement with such companies, because to do so would be unethical and improper, and may violate the law.

All material used in the course of Clorox business that is protected by copyrights, trademarks or other intellectual property rights of others must be appropriately used with permission from the third party that owns or controls such rights. Questions about whether permission is needed, or whether the material may already have been licensed by Clorox, should be directed to Legal Services. More detailed information regarding Clorox policy and procedures on the protection of the trade secrets of others is contained in our Trade Secrets of Others Policy.

Use, Security and Monitoring of Systems

We follow all Clorox information technology security standards and procedures.

We maintain a comprehensive information security program that includes administrative, technical and physical safeguards to protect the confidentiality, integrity and availability of Clorox's information systems and technology assets. We strictly control access and use of our technology systems, and may at any time monitor the use and content of our networks and computing assets. Use of our systems and other technology resources is intended primarily for business purposes. All information and data stored on or transmitted through Clorox's technology resources is subject to all Clorox policies.

Unless we have a legitimate business need and are authorized to do so, we are expressly prohibited from accessing any system or database containing sensitive employee, company, customer or consumer information. This includes accessing a system or database related to a former job responsibility at Clorox, as well as receiving information via email distribution lists. If any one of us believes we may have access to a system or database containing sensitive information that is not required to perform our job duties, we must contact our manager or Legal Services.

We are each required to follow all Clorox policies, security measures and internal controls for computer and technology systems, including portable electronic devices, laptops, telephones and other storage devices provided by Clorox. More detailed information regarding Clorox policies, standards and procedures on security measures and internal controls for computer and communication systems is contained in our Information Security Policy and Information Technology Access, Use and Monitoring Policy.

Antitrust and Competition Laws

We follow antitrust and fair competition laws.

Clorox is a staunch supporter of free and fair competition. Any conduct that would unfairly and unlawfully diminish competition in the marketplace is forbidden and will not be tolerated. To ensure markets operate fairly and efficiently, many nations have implemented laws to combat anti-competitive practices. We pride ourselves on strictly complying with these antitrust and competition laws, which are designed to protect free enterprise. While antitrust and competition laws are complex, they generally forbid discussing or entering into formal or informal agreements regarding activities that may restrain trade.

Examples of conduct that is generally prohibited under the antitrust and competition laws and this Code include but are not limited to:

- Any agreements among competitors about price
- Any agreements among competitors to allocate markets or customers
- Coordinating an agreement among customers not to deal with a competitor
- Unlawful restrictions on resale
- Sales unlawfully conditioned on agreements to purchase other products
- Exchanging commercially sensitive information with competitors, even if there is no agreement of any kind

More detailed information regarding prohibited antitrust conduct is contained in our Antitrust and Global Competition Policy.



Interference with an Audit

We cooperate with all audit requests.

It is unlawful to attempt to persuade an outside auditor to approve false financial statements. We are prohibited from making any false or misleading statements to our auditors or from taking any action to fraudulently influence, coerce, manipulate or mislead the auditors of Clorox financial statements. In addition, we honestly cooperate with all external and internal audit requests.



Conflicts of Interest

We avoid conflicts of interest or even the appearance of a conflict.

A conflict of interest occurs when one's personal interests influence or appear to influence one's ability to act in the best interest of Clorox. We must address conflicts of interest in an ethical manner to ensure the decisions we make involving Clorox or its business are in the best interest of Clorox. Our personal interests can affect our decisions even when we think they will not, and conflicts of interest can have a negative impact on those around us. It is important to disclose conflicts of interest to our managers promptly and accurately, and to abide by any measures put in place by Clorox to protect its interests.

Our financial interests in other companies that do business with Clorox or compete with Clorox can create conflicts of interest. Accordingly, we must disclose any significant financial interest in any Clorox competitors, suppliers or customers. Ownership of less than 1% of a public company's outstanding shares is generally not considered to be a significant financial interest and therefore need not be disclosed unless it influences our judgment or decisions.

We must not accept from others, directly or indirectly, any form of compensation for work or services relating to our Clorox responsibilities. In addition, we may not take an outside project or position with an entity that is a supplier, business partner or competitor of Clorox. We must not serve on boards of directors of entities that do business with Clorox without advance review by Legal Services and without preapproval from our managers.

A conflict of interest may also exist if any member of your immediate family is employed by a Clorox competitor, supplier or customer. Immediate family members include spouses, domestic partners, parents, children, siblings, mothers- and fathers-in-law, sons- and daughters-in-law, brothers- and sisters-in-law and anyone, other than tenants or household employees, who shares your home. Remember that it is not permitted to do indirectly through a third party, including a family member, what would be prohibited if done directly.

We must disclose any actual or potential conflict of interest to our managers and Legal Services. Directors and executive officers must disclose actual or potential conflicts of interest to the Executive Vice President – General Counsel and Corporate Affairs or the Audit Committee. The appropriate Clorox personnel will evaluate the situation to determine what measures are necessary to address the potential conflict of interest.

Whether a conflict of interest exists is not always clear. When in doubt, we should discuss the particular situation with our managers or Legal Services. Directors and executive officers should contact the Senior Vice President – General Counsel with questions.

Confidential Information and Privacy

We take the appropriate steps to safeguard confidential information.

Safeguarding confidentiality and privacy is everyone's responsibility. Misusing or exposing Clorox's or others' confidential or personal information may damage Clorox's reputation and success and cause harm to others. We each must maintain the security, privacy and integrity of Clorox's confidential information as well as the confidential information of other companies and individuals that we obtain while at Clorox and protect it from unauthorized, incorrect or accidental access, use or disclosure. This includes all information that we learn about Clorox, as well as our employees, suppliers, customers, consumers and business partners that is not intended for public dissemination, such as trade secrets, personally identifiable information, sensitive business, technical information and communications regarding legal matters. More information about the standards and procedures we have established to protect confidential and personal information is in our Confidential Information Policy.

question

Can I tell my manager about a potential acquisition target Clorox is considering?

Q&A

confidential information

answer

It depends. Only certain essential team members are informed of a potential acquisition and they are subject to strict nondisclosure obligations. So, unless you know your manager is already part of the team working on that project, you should check with the project lead before talking to your manager about it.

Workplace Behavior

We value and promote both equal employment opportunity and inclusion, and do not tolerate discrimination, intimidation or harassment.

We are committed to providing a work environment free of discrimination and harassment. We are each responsible for maintaining a work environment consistent with our Code and Clorox policies and with our culture of respect and dignity. Discrimination against or harassment of any group or individual on the basis of race, color, national origin, sex, gender, gender identity or expression, sexual orientation, marital status, registered domestic partner status, citizenship status, religion, age, physical or mental disability, medical condition, genetic characteristics and information, ancestry, military and veteran status or any other protected category is strictly prohibited. Harassment of an employee off Clorox premises is also prohibited.

Retaliation against anyone for rejecting sexual advances, making a good faith report of discrimination or harassment, or providing information or assistance in the investigation of such a report will not be tolerated. More detailed information regarding standards of conduct is contained in our Anti-Harassment Policy.



Treatment of Employees and Others

We respect each other and maintain fairness in relationships.

We must treat each other and anyone with whom we interact on behalf of Clorox with respect and dignity. Treating everyone in the workplace with respect is a value that applies to each of us. We are expected to treat our colleagues, including nonemployees with whom we work, with fairness and dignity.

Relationships with Business Partners (Including Distributors, Suppliers, Consultants and Others)

We engage in fair and ethical dealings.

Our commitment to treating people with dignity, respect and equal opportunity extends to our business partners. We conduct our business with honesty and integrity, and we expect our business partners' values and business practices to mirror ours regarding compliance with the law, product quality, safety, human rights, treatment of employees and environmental compliance.

We require all suppliers that do business with Clorox to comply with the principles in our Business Partner Code of Conduct. Our Business Partner Code of Conduct outlines our expectations that suppliers share our commitments in the areas of human rights, labor, health and safety, the environment, and business conduct and ethics. In addition, these principles and standards of conduct apply to each one of us.

Moreover, we should report any violations of our Business Partner Code of Conduct by any supplier or other business partner as set out in the Business Partner Code of Conduct. Our Business Code of Conduct can be found [here](#).



Our commitment to treating people with dignity, respect and equal opportunity extends to our business partners.

Clorox Records and Money

We are responsible for the accuracy of our records and financial statements.

All Clorox records must be complete, timely, and maintained and presented accurately and reliably. Forgery and alteration of documents is prohibited. This includes the unauthorized alteration or manipulation of computer files. False or intentionally misleading entries in Clorox books or records must never be made.

We each have a duty to protect and properly use Clorox resources. We must accurately account for all Clorox money and spend it only on lawful Clorox-related purposes. If our duties involve verification of expenditures of Clorox money or requests for reimbursement, we are each responsible for verifying that our expenditures legitimately comply with Clorox policies and applicable laws, and that the amount of reimbursement received is accurate. We are all responsible for safeguarding Clorox assets, and therefore we must ensure proper accounting of expenses incurred as well as accurate payment of reimbursement requests. All requests for reimbursement must be submitted on a timely basis and supported by original receipts. In addition, our expenditures must be properly recorded and comply with all applicable Clorox policies, including the Travel and Expense Reimbursement Policy.



Q&A

records
management

question

My manager has asked me to shred documents or delete emails related to a project handled by my department. Is it OK for me to do this?

answer

If there is no ongoing or likely lawsuit, investigation, audit or examination to which the documents may relate, the destruction of documents and emails in the ordinary course of business is permissible if done in accordance with our Records Management Policy and Records Retention Schedule.

Records Management

We manage business records in accordance with applicable retention requirements.

Various laws and good business practices require Clorox to keep certain business records, including electronic records, for specific periods of time. In addition, we may not discard certain relevant records when litigation, subpoenas, audits or investigations are pending or anticipated. Storing business records longer than necessary, however, incurs needless costs and potential risks for Clorox and prevents the efficient retrieval and accessibility of relevant records.

We must all strictly comply with Clorox policies on management of company records. For specific information regarding how long to keep and how to dispose of business records, consult all applicable policies and schedules, including the Records Management Policy and Records Retention Schedule.

Social Media and Other Online Activity

We are responsible in our use of social media and other online platforms.

Those of us who use online communication tools like blogs, social media sites and other digital platforms — whether on our own personal time or in an official capacity on behalf of Clorox — assume responsibility for ensuring that our activities do not violate Clorox policies or cause Clorox to violate laws or regulations.

Any time we endorse or promote Clorox or any of our products in a forum in which our connection to Clorox is not obvious, whether in person or online, we must disclose our connection to Clorox. Such disclosure must be clear and conspicuous, readily visible within our communication, and understandable and apparent to the average reader near the beginning of the communication. These requirements apply even to comments we make on our own personal blog or social media pages or on third-party websites, as well as to actions we take on Clorox-affiliated websites, such as product ratings and reviews and our brands' social media pages. If we use social media or other forums to express our personal views regarding Clorox, our products or our competitors, we should not indicate or imply that our comments represent the positions, strategies or opinions of Clorox. If we engage or provide something of value to a consultant, agency, celebrity, consumer, blogger or other party to entice or encourage them to review, promote or endorse Clorox or our products, or criticize our competitors' products, we must ensure that those parties also disclose their affiliation with Clorox. Additionally, we should never attempt to inappropriately view or access the personal social media accounts of our employees and job applicants.

For more detailed information regarding Clorox's policy and procedures on social media, please refer to our Social Media Policy.

question

I was browsing a social media site and saw a criticism of a Clorox product. I'm very familiar with the product and want to respond to the criticism with positive comments about the product. Do I have to say that I work for Clorox?

Q&A social media

answer

Yes. Any time we endorse or promote Clorox or our products online we must clearly and conspicuously disclose that we are an employee, director or consultant of Clorox, unless that fact is already apparent.

Any time we endorse or promote Clorox ... we must disclose our connection to the company in a clear and conspicuous manner.





Environmental, Health and Safety Laws and Regulations

We maintain a safe and healthy work environment.

All employees and directors are expected to fully comply with all applicable environmental, health and safety laws and regulations. These laws are extremely important to the ongoing health of our employees, business and communities. Clorox has written operating policies and procedures that govern our commitment to comply with all applicable environmental, health and safety laws and regulations, and we are expected to abide strictly by these policies and procedures. In addition, it is essential that all reports or representations made by or on behalf of Clorox to any environmental, health or safety regulatory body are submitted completely and accurately, containing no false or misleading statements or false or misleading omissions.

Human Rights

We recognize and promote human rights on a global basis.

We prohibit the use of forced or otherwise illegal labor and human trafficking. We do not condone the exploitation, physical punishment, abuse, trafficking or involuntary servitude of children or others. We require our business partners to exhibit respect for fundamental human rights and human dignity and respect for the equal rights of men and women while doing business with us. Our expectation of business partners on these issues is explicitly outlined in our [Business Partner Code of Conduct](#).

Global Trade: Export Controls, Restricted Countries, Imports and Boycotts

We follow and abide by applicable global trade laws.

Everyone at Clorox must comply with applicable global trade laws and regulations. Each employee and site that is involved in the cross-border transfer of any goods has the responsibility of ensuring that such activities are conducted in compliance with all applicable import and export laws.

The U.S. and other governments impose sanctions or otherwise restrict transactions with certain individuals, entities and countries. The restrictions are generally associated with parties engaged in the proliferation of weapons of mass destruction, narcotics trafficking, membership in transnational criminal organizations and terrorism. Everyone at Clorox must comply with applicable prohibitions or limitations on transactions with sanctioned or restricted parties.

Governments also sometimes seek to advance their own political agendas by pressuring companies with whom they do business to boycott the companies or products of other countries. U.S. anti-boycott laws forbid Clorox from complying with unsanctioned boycott requests, whether oral or in writing. Clorox is also required to report these requests to the U.S. government. If we receive any requests to support an unsanctioned boycott, we must ignore the requests and report them to our managers and Legal Services. Please see the Global Trade Compliance Policy for more information regarding global trade laws.

We require our business partners to exhibit respect for fundamental human rights and human dignity and respect for the equal rights of men and women.