

## **The Clorox International Company**

### **UK Modern Slavery Act Transparency Statement**

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

#### **Our Business**

The Clorox Company is a leading multinational manufacturer and marketer of consumer and professional products with fiscal year 2018 net sales of \$6.1 billion and more than 8,700 employees worldwide as of June 30, 2018. 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.

The Company purchases products, such as raw materials, 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.

#### **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. It 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 provides all employees with regular training regarding compliance with the Clorox Code, including segments on modern slavery.

#### **Clorox Business Partner Code of Conduct**

Clorox also has a Business Partner Code of Conduct ("Business Partner Code") 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.

Clorox encourages individuals to report potential issues. 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.

### **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. We employ 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.



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Angela Hilt, VP-Deputy General Counsel

Date: December 14, 2018

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