

UK Tax Strategy

This Tax Strategy has been published in compliance with the duty of CBee (Europe) Limited, a subsidiary of The Clorox Company, to publish its tax strategy in accordance with section 161 and paragraph 19(2) of Schedule 19 of the Finance Act 2016 in relation to the accounting period ended 30 June 2018.

Introduction

The Clorox Company is a US publically listed business headquartered in Oakland, California and is a global manufacturer of consumer and professional products with known brands sold in more than 100 countries, from household cleaning products to personal care and pet supplies. The Clorox Company manages its European business through CBee (Europe) Limited, which trades in the UK and continental Europe, selling directly through retail, online and distributor channels.

CBee (Europe) Limited and its staff adhere strongly to The Clorox Company's global [Code of Conduct](#) which applies to all of the Group's businesses around the world. This code establishes the ethical and legal standards of behaviour and business practices that is expected across the business. One of the core values embedded in this document is 'Do the Right Thing' where it is recognised that the long-term health of the Group depends on integrity and making decisions that uphold high standards and ethics.

At The Clorox Company, we take our commitments under this code seriously and our day-to-day operations are guided by these principles, including our approach to tax in the UK and the formation of our Tax Strategy.

Governance and risk management

With respect to the UK, the identification and management of risk lies with the UK leadership team with governance monitored by the UK based Finance team. Risks, to which the business may be exposed, including its tax risks, are reviewed by the UK Finance Team and any matters of concern will be escalated to the International Tax Team based in California, who in turn will inform the VP of Taxes and the Chief Financial Officer ("CFO") of risk requiring attention.

Further support on the identification of risk is provided by the group's internal audit function that performs regional visits in line with a centrally agreed rolling agenda. Any recommendations arising from internal audit reviews will be implemented by local teams and monitored at the group level. At The Clorox Company, we want to ensure that the policies and procedures we have in place support good risk management and we are therefore supportive of any improvements that can be made.

We adopt a low risk approach to tax in line with our established governance and risk framework. Given the scale of our business and its multinational operations, risks will arise from time to time in relation to the interpretation of complex tax laws and their application to our compliance arrangements. As we are part of an organisation that is over 100 years old, it is important to us to maintain our good reputation and we do not want to expose the business to risk that would be detrimental to this long-standing reputation. We therefore seek to identify and monitor these risks and may seek external advice where there is significant uncertainty in relation to specific tax obligations.

Tax compliance and reporting

As an organisation, we are committed to meeting all of our legal and regulatory requirements in paying the correct amount of tax. In order to achieve this, we seek to ensure that our staff are fully engaged with the key principles in our Code of Conduct and our senior management lead by example in this respect.

Our compliance and reporting processes are underpinned by a strong internal control framework, and designed to help us meet all of our tax requirements. We seek to apply diligent professional care and judgement in relation to all of our UK tax compliance activities and where necessary, we

use external advisors to provide assistance and tax technical expertise in respect of our UK tax compliance and reporting requirements.

Our approach to tax planning

At The Clorox Company, we do not seek to engage in any tax planning that would be contrary to relevant tax laws, our Code of Conduct, or that would result in a reputational risk to our business. Any tax planning that is undertaken is influenced by genuine commercial considerations and we seek to ensure any actions taken are aligned with the ethical and legal standards of business practices, enshrined in our Code of Conduct. Where we engage with reliefs or incentives made available to us by HMRC, we will endeavour to apply them in the manner intended and will seek external advice on matters of significant uncertainty.

Relationships with UK Tax Authorities

We aim to provide accurate and timely communications about our business when dealing with any public body. Accordingly, we seek to ensure that all of our dealings with HMRC, whether they relate to historic, current or future matters, are conducted in an open and honest manner.

As a responsible business, we will seek third party advice in respect of any matters of complexity and will aim to work with HMRC to ensure that any differences of opinion in respect of the application of the law are resolved in a collaborative manner.

This Tax Strategy has been approved by the Board of CBee (Europe) Limited for the accounting period ended 30 June 2018.