

CDP Forests Questionnaire 2020

F0. Introduction

F0.1

(F0.1) Give a general description of and introduction to your organization.

The Clorox Company (NYSE: CLX) is a leading multinational manufacturer and marketer of consumer and professional products with about 8,800 employees worldwide and fiscal year 2020 sales of \$6.7 billion. 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 and wraps; Kingsford® charcoal; Hidden Valley® dressings and sauces; Brita® water-filtration products; Burt's Bees® natural personal care products; and RenewLife®, Rainbow Light®, Natural Vitality Calm™, NeoCell® and Stop Aging Now® vitamins, minerals and supplements. The company also markets industry-leading products and technologies for professional customers, including those sold under the CloroxPro™ and Clorox Healthcare® brand names. 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 signatory of the United Nations Global Compact and the Ellen MacArthur Foundation's New Plastics Economy Global Commitment. The company has been broadly recognized for its corporate responsibility efforts, named to the 2020 Axios Harris Poll 100 reputation rankings, Barron's 2020 100 Most Sustainable Companies list, and the Human Rights Campaign's 2020 Corporate Equality Index, among others. In support of its communities, The Clorox Company and its foundations contributed more than \$25 million in combined cash grants, product donations and cause marketing in fiscal year 2020. For more information, visit [TheCloroxCompany.com](https://www.TheCloroxCompany.com), including the Good Growth blog, and follow the company on Twitter at @CloroxCo.

Clorox is committed to good growth: growth that's profitable, consistent and achieved responsibly. Not only is it the right thing to do, we believe it's the key to our long-term success. Good growth starts with a commitment to addressing climate change. Rising greenhouse gas emissions pose a real threat to the health of our planet — from the existence of wildlife to the biodiversity of habitats as well as the availability of water and other natural resources. That's why Clorox supports congressional action on comprehensive national climate change legislation aimed at reducing total emissions of greenhouse gas over time without causing undue hardships for the U.S. economy.

Over 90 percent of our fiber use is in packaging; primary package that contains our products and secondary packaging in which we ship our products. Our strategy to minimize the impact of packaging fiber sourcing starts by reducing the amount used. Next, we work to maximize recycled fiber in packaging. When virgin fiber is required, we seek to ensure our suppliers source from sustainable forests and that responsible forestry practices have been followed. In addition to packaging, we use wood-based fiber in some products, namely Clorox® disinfecting wipes, Green Works® compostable cleaning wipes, Burt's Bees® towelettes and Burt's Bees®

baby wipes. Although we don't purchase this fiber directly, approximately 97 percent of the tree-based material in our wipes are from FSC certified sources. Our Kingsford Manufacturing Division uses mill wood residuals and by-products to create charcoal briquettes. We minimize our footprint by not cutting down trees for use in manufacturing. All of the wood used by Kingsford is sourced in the U.S.

Clorox sources a low volume of palm oil ingredients for its operations with 99% being palm oil or palm kernel oil derivatives and represents less than 0.003 percent of palm oil produced globally each year. Typically present in very small percentages as sub-components of surfactants, fatty alcohols, emulsifiers or fragrances, palm oil derivatives are used in some cleaning products, food flavorings, as well as natural personal care products for the Clorox, Hidden Valley, and Burt's Bees brands. Although our use is very small, we are committed to ensuring our sourcing of palm-derived materials does not contribute to deforestation, peat clearance or infringe upon the rights of workers and indigenous peoples. We believe the most effective way to influence supply chain is through collaboration and partnership with our suppliers, consumer packaged goods peers and nongovernmental organizations. Our goals and commitments extend globally to all types of palm materials and ingredients that we currently purchase, or will purchase in the future, for our manufacturing operations in all countries where we operate.

As a leader in environmental sustainability, in 2019 Clorox unveiled an ambitious set of environmental, social and governance (ESG) goals integrated with our strategic business choices. In conjunction with our new ESG strategy and our [Environmental Policy](#), we refreshed our palm oil commitments to ensure respect for human and labor rights, local communities and biodiversity in the palm oil supply chain.

F0.2

(F0.2) State the start and end date of the year for which you are reporting data.

	Start Date	End Date
Reporting year	January 1, 2019	December 31, 2019

F0.3

(F0.3) Select the currency used for all financial information disclosed throughout your response.

USD

F0.4

(F0.4) Select the forest risk commodity(ies) that you are, or are not, disclosing on. For each forest risk commodity selected, identify the stages of the supply chain which best represents your organization's area of operation.

	Commodity disclosure	Stage of the value chain	Explanation if not disclosing
Timber products	Disclosing	Manufacturing	

Palm oil	Disclosing	Manufacturing	
Cattle products	Not disclosing	Manufacturing	The only known cattle commodity in our supply chain is buttermilk used in some of our Food products produced in the U.S. These ingredients are made from milk produced primarily in the U.S., with potential for some to be sourced in Canada, where there is no known deforestation risk. Therefore, we will not be reporting on this commodity at this time.
Soy	Not disclosing	Manufacturing	<p>We use Soy bean oil in some of our Food product lines and cosmetics. All the soy bean oil we purchase directly is produced in the US, with the vast majority made from soy beans grown in the US. For the fraction of soy bean oil we purchase that is made from soy beans grown outside the US (but oil produced in the US), we estimate the volume to be less than 1%, all of which is sourced from soy beans grown in Canada, all of which has low deforestation risk associated with it.</p> <p>We use soy derivative ingredients in some of our formulas, such as derivative ingredients that extend the shelf life of some of our Food and natural personal care products. These soy derivatives in aggregate, represent small volumes of soy, with minimal deforestation risk being sourced from suppliers in the US.</p> <p>Our Contract manufacturers purchase soy bean oil for turn-key products for our company. We have not traced soy beans used in the oil purchased by our contract manufacturers to country of origin, but we estimate their source countries to be similar to ours since they are US based locations with similar supply chains.</p> <p>The volumes we purchase are very small and we expect to be able to continue to source soy bean oil from these same regions with minimal deforestation risk. Although our volumes are small, Clorox participated in USB Phase 1 Project, soybean mapping exercise with Earthworm to understand overall traceability of the supply chain in the US Clorox will disclose in the future, if, in the event supply issues require sourcing Soy bean oil from outside the US in regions where deforestation is a higher risk. At that point we will provide information on how we would mitigate potential deforestation through mechanisms such as certified sustainable soy material.</p>

Other - Rubber	This commodity is not produced, sourced or used by our organization		
Other - Cocoa	This commodity is not produced, sourced or used by our organization		
Other - Coffee	This commodity is not produced, sourced or used by our organization		

F0.5

(F0.5) Are there any parts of your direct operations or supply chain that are not included in your disclosure?

No

F1. Current state

F1.1

(F1.1) How does your organization produce, use or sell your disclosed commodity(ies)?

Timber products

Activity

Using as input into product manufacturing
Distributing/packaging

Form of commodity

Pulp
Primary packaging
Secondary packaging
Cellulose-based textile fiber
Other, please specify
Mill wood residuals and by-products

Source

Contracted suppliers (manufacturers)

Country/Area of origin

Argentina
Brazil
Canada
China
Colombia
Ecuador
Mexico
Peru
Philippines
Switzerland
United States of America
Uruguay

% of procurement spend

6-10%

Comment

We use paper-based primary and secondary packaging for several product categories. These include cartons, corrugate and paper-based bags. The majority of these paper-based packaging materials are sourced in the U.S., with the balance sourced in Latin America and Asia to support products produced in those regions. The substrates for our Wipes product lines contain paper-based pulp or cellulose-based textile fiber. Although we don't purchase this fiber directly, these timber-based materials are sourced largely from the U.S. and approximately 97 percent of the tree-based material in our wipes is from FSC certified sources. Our Kingsford Manufacturing Division uses mill wood residuals and by-products in its manufacturing process to create charcoal briquettes. By using residual and by-product wood, we are able to minimize our footprint by not cutting down trees to be utilized in the manufacturing process. We also source some mesquite wood char for one of our charcoal product lines. All of the wood used in the Kingsford business is sourced in the U.S.

Palm oil

Activity

Using as input into product manufacturing

Form of commodity

Refined palm oil
Palm oil derivatives
Palm kernel oil derivatives

Source

Contracted suppliers (manufacturers)

Country/Area of origin

Argentina
Brazil
Chile
Colombia

Costa Rica
 Indonesia
 Malaysia
 Mexico
 Philippines

% of procurement spend

1-5%

Comment

The company’s use of palm oil ingredients is largely limited to derivatives of palm and palm kernel oil, with derivatives representing more than 99% of palm oil and palm kernel oil consumed in 2019. Typically present in very small percentages as sub-components of surfactants, fatty alcohols, emulsifiers or fragrances, palm oil derivatives are used in some of our bio-based and conventional cleaning products, food flavorings and fragrances as well as natural personal care products such as cleansers, lotions, shampoos and soaps. In 2019, we achieved 99 percent traceability to the origin refiner and 89 percent traceability to the mill for our priority suppliers, which represented 89 percent of our domestic business palm oil derivative purchases. Brazil’s volume represents less than .01% of Clorox’s sourced volume

F1.2

(F1.2) Indicate the percentage of your organization’s revenue that was dependent on your disclosed forest risk commodity(ies) in the reporting year.

	% of revenue dependent on commodity	Comment
Timber products	91-99%	The substrates for our Wipes product lines contain paper-based pulp. We use paper based primary and secondary packaging for most of our product categories. These include cartons, corrugate and paper-based bags. Our Kingsford Manufacturing Division uses mill wood residuals and by-products in its manufacturing process to create charcoal briquettes, as well as some mesquite wood char for one of our charcoal product lines. All of the wood used in the Kingsford business is sourced in the U.S. This percentage of revenue represents an estimate of the revenues generated by products that fall under at least one of these categories.
Palm oil	41-50%	Clorox’s total palm oil ingredient volume represents less than 0.003 percent of palm oil produced globally each year, and our sourcing is limited to 99% derivatives of palm and palm kernel oil. Typically present in very small percentages as sub-components of surfactants, fatty alcohols, emulsifiers or fragrances, palm oil derivatives are used in some cleaning products, food flavorings and fragrances as well as small volumes of natural personal care products.

F1.5

(F1.5) Does your organization collect production and/or consumption data for your disclosed commodity(ies)?

	Data availability/Disclosure
Timber products	Consumption data available, disclosing
Palm oil	Consumption data available, disclosing

F1.5a

(F1.5a) Disclose your production and/or consumption data.

Forest risk commodity

Timber products

Data type

Consumption data

Volume

800,000

Metric

Metric tons

Data coverage

Full commodity production/consumption

Please explain

Forest risk commodity

Palm oil

Data type

Consumption data

Volume

2,137

Metric

Metric tons

Data coverage

Partial commodity production/consumption

Please explain

Clorox does not source any crude Palm Oil or Palm Kernel Oil, but a very small volume of refined palm oil. Volume represents palm oil and palm oil in derivative ingredients sourced directly by the company for products produced globally. The reported volume does not include material sourced by contract manufacturers producing turn-key products. We estimate that this reported volume represents more than 85% of global palm oil material consumed in all products sold by Clorox.

F1.5b

(F1.5b) For your disclosed commodity(ies), indicate the percentage of the production/consumption volume sourced by national and/or sub-national jurisdiction of origin.

Forest risk commodity

Timber products

Country/Area of origin

Argentina

State or equivalent jurisdiction

Don't know

% of total production/consumption volume

0.56

Please explain

This number is calculated as a percentage of our total global timber footprint, which includes packaging, wipes fiber, and wood by-product. Our timber commodities sourced from Argentina are limited to packaging fiber.

We use paper-based primary and secondary packaging for several product categories. These include cartons, corrugate and paper-based bags. The majority of these paper-based packaging materials are sourced in the U.S., with the balance sourced in Latin America and Asia to support products produced in those regions. Fiber sourced from Argentina makes up approximately 3.1% of our total global packaging fiber volume and we have verified through our annual Fiber Certification Survey that this volume is almost 99% certified virgin or recycled fiber.

The substrates for our Wipes product lines contain paper-based pulp or cellulose-based textile fiber. Although we don't purchase this fiber directly, these timber-based materials are sourced largely from the U.S. and approximately 97 percent of the tree-based material in our wipes are from FSC certified sources. Our Kingsford Manufacturing Division uses mill wood residuals and by-products in its manufacturing process to create charcoal briquettes. By using residual and by-product wood, we are able to minimize our footprint by not cutting down trees to be utilized in the manufacturing process. We also source some mesquite wood char for one of our charcoal product lines. All of the wood used in the Kingsford business is sourced in the U.S.

Forest risk commodity

Timber products

Country/Area of origin

Brazil

State or equivalent jurisdiction

Don't know

% of total production/consumption volume

0.02

Please explain

This number is calculated as a percentage of our total global timber footprint, which includes packaging, wipes fiber, and wood by-product. Our Timber commodities sourced from Brazil are limited to packaging fiber.

We use paper-based primary and secondary packaging for several product categories. These include cartons, corrugate and paper-based bags. The majority of these paper-based packaging materials are sourced in the U.S., with the balance sourced in Latin America and Asia to support products produced in those regions. Fiber sourced from Brazil makes up approximately 0.1% of our total global packaging fiber volume and we have verified through our annual Fiber Certification Survey that this volume is 100% certified virgin or recycled fiber

The substrates for our Wipes product lines contain paper-based pulp or cellulose-based textile fiber. Although we don't purchase this fiber directly, these timber-based materials are sourced largely from the U.S. and approximately 97 percent of the tree-based material in our wipes are from FSC certified sources. Our Kingsford Manufacturing Division uses mill wood residuals and by-products in its manufacturing process to create charcoal briquettes. By using residual and by-product wood, we are able to minimize our footprint by not cutting down trees to be utilized in the manufacturing process. We also source some mesquite wood char for one of our charcoal product lines. All of the wood used in the Kingsford business is sourced in the U.S.

Forest risk commodity

Timber products

Country/Area of origin

Colombia

State or equivalent jurisdiction

Don't know

% of total production/consumption volume

0.21

Please explain

This number is calculated as a percentage of our total global timber footprint, which includes packaging fiber, wipes fiber, and wood by-product. Our Timber commodities sourced from Columbia are limited to packaging fiber.

We use paper-based primary and secondary packaging for several product categories. These include cartons, corrugate and paper-based bags. The majority of these paper-based packaging materials are sourced in the U.S., with the balance sourced in Latin America and Asia to support products produced in those regions. Fiber sourced from Colombia makes up approximately 1.2% of our total global packaging fiber volume and we have verified through our annual Fiber Certification Survey that this volume is 100% certified virgin or recycled fiber

The substrates for our Wipes product lines contain paper-based pulp or cellulose-based textile fiber. Although we don't purchase this fiber directly, these timber-based materials are sourced largely from the U.S. and approximately 97 percent of the tree-based material in our wipes are from FSC certified sources. Our Kingsford Manufacturing Division uses mill wood residuals and by-products in its manufacturing process to create charcoal briquettes. By using residual and by-product wood, we are able to minimize our footprint by not cutting down trees to be utilized in the manufacturing process. We also source some mesquite wood char for one of our charcoal product lines. All of the wood used in the Kingsford business is sourced in the U.S.

Forest risk commodity

Timber products

Country/Area of origin

Ecuador

State or equivalent jurisdiction

% of total production/consumption volume

0.11

Please explain

This number is calculated as a percentage of our total global timber footprint, which includes packaging fiber, wipes fiber, and wood by-product. Our Timber commodities sourced from Ecuador are limited to packaging fiber.

We use paper-based primary and secondary packaging for several product categories. These include cartons, corrugate and paper-based bags. The majority of these paper-based packaging materials are sourced in the U.S., with the balance sourced in Latin America and Asia to support products produced in those regions. Fiber sourced from Ecuador makes up approximately 0.6% of our total global packaging fiber volume and we have verified through our annual Fiber Certification Survey that this volume is 100% certified virgin or recycled fiber

The substrates for our Wipes product lines contain paper-based pulp or cellulose-based textile fiber. Although we don't purchase this fiber directly, these timber-based materials are sourced largely from the U.S. and approximately 97 percent of the tree-based material in our wipes are from FSC certified sources. Our Kingsford Manufacturing Division uses mill wood residuals and by-products in its manufacturing process to create charcoal briquettes. By using residual and by-product wood, we are able to minimize our footprint by not cutting down trees to be utilized in the manufacturing process. We also source some mesquite wood char for one of our charcoal product lines. All of the wood used in the Kingsford business is sourced in the U.S.

Forest risk commodity

Timber products

Country/Area of origin

Mexico

State or equivalent jurisdiction

Don't know

% of total production/consumption volume

0.24

Please explain

This number is calculated as a percentage of our total global timber footprint, which includes packaging fiber, wipes fiber, and wood by-product. Our Timber commodities sourced from Mexico are limited to packaging fiber.

We use paper-based primary and secondary packaging for several product categories. These include cartons, corrugate and paper-based bags. The majority of these paper-based packaging materials are sourced in the U.S., with the balance sourced in Latin America and Asia to support products produced in those regions. Fiber sourced from Mexico makes up approximately 1.3% of our total global packaging fiber volume and we have verified through our annual Fiber Certification Survey that this volume is 100% certified virgin or recycled fiber

The substrates for our Wipes product lines contain paper-based pulp or cellulose-based textile fiber. Although we don't purchase this fiber directly, these timber-based materials are sourced largely from the U.S. and approximately 97 percent of the tree-based material in our wipes are from FSC certified sources. Our Kingsford Manufacturing Division uses mill wood residuals and by-products in its manufacturing process to create charcoal briquettes. By using residual and by-product wood, we are able to minimize our footprint by not cutting down trees to be utilized in the manufacturing process. We also source some mesquite wood char for one of our charcoal product lines. All of the wood used in the Kingsford business is sourced in the U.S.

Forest risk commodity

Timber products

Country/Area of origin

Peru

State or equivalent jurisdiction

Don't know

% of total production/consumption volume

0.04

Please explain

This number is calculated as a percentage of our total global timber footprint, which includes packaging fiber, wipes fiber, and wood by-product. Our Timber commodities sourced from Peru are limited to packaging fiber.

We use paper-based primary and secondary packaging for several product categories. These include cartons, corrugate and paper-based bags. The majority of these paper-based packaging materials are sourced in the U.S., with the balance sourced in Latin America and Asia to support products produced in those regions. Fiber sourced from Peru makes up approximately 0.2% of our total global packaging fiber volume and we have verified through our annual Fiber Certification Survey that this volume is 100% certified virgin or recycled fiber

The substrates for our Wipes product lines contain paper-based pulp or cellulose-based textile fiber. Although we don't purchase this fiber directly, these timber-based materials are sourced largely from the U.S. and approximately 97 percent of the tree-based material in our wipes are from FSC certified sources. Our Kingsford Manufacturing Division uses mill wood residuals and by-products in its manufacturing process to create charcoal briquettes. By using residual and by-product wood, we are able to minimize our footprint by not cutting down trees to be utilized in the manufacturing process. We also source some mesquite wood char for one of our charcoal product lines. All of the wood used in the Kingsford business is sourced in the U.S.

Forest risk commodity

Timber products

Country/Area of origin

Philippines

State or equivalent jurisdiction

Don't know

% of total production/consumption volume

0.01

Please explain

This number is calculated as a percentage of our total global timber footprint, which includes packaging fiber, wipes fiber, and wood by-product. Our Timber commodities sourced from Philippines are limited to packaging fiber.

We use paper-based primary and secondary packaging for several product categories. These include cartons, corrugate and paper-based bags. The majority of these paper-based packaging materials are sourced in the U.S., with the balance sourced in Latin America and Asia to support products produced in those regions. Fiber sourced from Philippines makes up approximately 0.1% of our total global packaging fiber volume and we have verified through our annual Fiber Certification Survey that this volume is 100% certified virgin or recycled fiber

The substrates for our Wipes product lines contain paper-based pulp or cellulose-based textile fiber. Although we don't purchase this fiber directly, these timber-based materials are sourced largely from the U.S. and approximately 97 percent of the tree-based material in our wipes are from FSC certified sources. Our Kingsford Manufacturing Division uses mill wood residuals and by-products in its manufacturing process to create charcoal briquettes. By using residual and by-product wood, we are able to minimize our footprint by not cutting down trees to be utilized in the manufacturing process. We also source some mesquite wood char for one of our charcoal product lines. All of the wood used in the Kingsford business is sourced in the U.S.

Forest risk commodity

Timber products

Country/Area of origin

Any other countries/areas

State or equivalent jurisdiction

% of total production/consumption volume

98.8

Please explain

We use paper-based primary and secondary packaging for several product categories. These include cartons, corrugate and paper-based bags. The majority of these paper-based packaging materials are sourced in the U.S., with the balance sourced in Latin America and Asia to support products produced in those regions. Of the countries listed in 1.1 but not reported in detail, above:

- The US makes up approximately 98.5% of our timber consumption (92% of our total global packaging fiber volume, more than 99% is certified virgin or recycled fiber as verified through our annual Fiber Certification Survey)
- Canada makes up approximately 0.12% of our timber consumption (approximately 0.6% of our total global packaging fiber volume, more than 77% is certified virgin or

recycled fiber as verified through our annual Fiber Certification Survey)
 - Switzerland makes up approximately 0.12% of our timber consumption (0.7 % of our total global packaging fiber volume, 100% is certified virgin or recycled fiber as verified through our annual Fiber Certification Survey)
 - China makes up less than 0.1% of our timber consumption (0.3% of our total global packaging fiber volume, 100% is certified virgin or recycled fiber as verified through our annual Fiber Certification Survey)
 The remaining 0.01% comes from a few other locations, including Uruguay and Portugal, the majority of which is packaging fiber.

The substrates for our Wipes product lines contain paper- based pulp or cellulose-based textile fiber. Although we don't purchase this fiber directly, these timber-based materials are sourced largely from the U.S. and approximately 97 percent of the tree-based material in our wipes are from FSC certified sources.

Our Kingsford Manufacturing Division uses mill wood residuals and by-products in its manufacturing process to create charcoal briquettes. By using residual and by-product wood, we are able to minimize our footprint by not cutting down trees to be utilized in the manufacturing process. We also source some mesquite wood char for one of our charcoal product lines. All of the wood used in the Kingsford business is sourced in the U.S.

Forest risk commodity

Palm oil

Country/Area of origin

Brazil

State or equivalent jurisdiction

Don't know

% of total production/consumption volume

11

Please explain

The company's sourcing of palm oil ingredients is limited to 99% derivatives of palm and palm kernel oil. Typically present in very small percentages as sub-components of surfactants, fatty alcohols, emulsifiers or fragrances, palm oil derivatives are used in some cleaning products, food flavorings and fragrances as well as some small volumes of natural personal care products. In 2019, we achieved 99 percent traceability to the origin refiner and 89 percent traceability to the mill for our priority suppliers, which represented 89 percent of our domestic business palm oil derivative purchases. Brazil represents approximately 11% of the Clorox sourced volume.

A comprehensive risk assessment was performed in 2019, identifying High Impact Suppliers, and will be utilized to engage with high our priority suppliers to bring visibility

of to their supply chains and support landscape level initiatives.

Forest risk commodity

Palm oil

Country/Area of origin

Indonesia

State or equivalent jurisdiction

Specify state/equivalent jurisdiction

Dumai

% of total production/consumption volume

12

Please explain

The company's sourcing of palm oil ingredients is limited to 99% derivatives of palm and palm kernel oil. Typically present in very small percentages as sub-components of surfactants, fatty alcohols, emulsifiers or fragrances, palm oil derivatives are used in some cleaning products, food flavorings and fragrances as well as some small volumes of natural personal care products. In 2019, we achieved 99 percent traceability to the origin refiner and 89 percent traceability to the mill for our priority suppliers, which represented 89 percent of our domestic business palm oil derivative purchases. Dumai volume represents approximately 12% of Clorox's sourced volume.

A comprehensive risk assessment was performed in 2019, identifying High Impact Suppliers, and will be utilized to engage with high our priority suppliers to bring visibility of to their supply chains and support landscape level initiatives.

Forest risk commodity

Palm oil

Country/Area of origin

Indonesia

State or equivalent jurisdiction

Specify state/equivalent jurisdiction

Lubuk Gaung

% of total production/consumption volume

16

Please explain

The company's sourcing of palm oil ingredients is limited to 99% derivatives of palm and palm kernel oil. Typically present in very small percentages as sub-components of surfactants, fatty alcohols, emulsifiers or fragrances, palm oil derivatives are used in

some cleaning products, food flavorings and fragrances as well as some small volumes of natural personal care products. In 2019, we achieved 99 percent traceability to the origin refiner and 89 percent traceability to the mill for our priority suppliers, which represented 89 percent of our domestic business palm oil derivative purchases. Lubuk Guang volume represents approximately 16% of Clorox’s sourced volume.

A comprehensive risk assessment was performed in 2019, identifying High Impact Suppliers, and will be utilized to engage with high our priority suppliers to bring visibility of to their supply chains and support landscape level initiatives.

Forest risk commodity

Palm oil

Country/Area of origin

Indonesia

State or equivalent jurisdiction

Specify state/equivalent jurisdiction
Tarahan

% of total production/consumption volume

12

Please explain

The company’s sourcing of palm oil ingredients is limited to derivatives of palm and palm kernel oil. Typically present in very small percentages as sub-components of surfactants, fatty alcohols, emulsifiers or fragrances, palm oil derivatives are used in some cleaning products, food flavorings and fragrances as well as some small volumes of natural personal care products. In 2019, we achieved 99 percent traceability to the origin refiner and 89 percent traceability to the mill for our priority suppliers, which represented 89 percent of our domestic business palm oil derivative purchases. Tarahan volume represents approximately 12% of Clorox’s sourced volume.

A comprehensive risk assessment was performed in 2019, identifying High Impact Suppliers, and will be utilized to engage with high our priority suppliers to bring visibility of to their supply chains and support landscape level initiatives.

Forest risk commodity

Palm oil

Country/Area of origin

Indonesia

State or equivalent jurisdiction

Specify state/equivalent jurisdiction
Batam

% of total production/consumption volume

11

Please explain

The company’s sourcing of palm oil ingredients is limited to derivatives of palm and palm kernel oil. Typically present in very small percentages as sub-components of surfactants, fatty alcohols, emulsifiers or fragrances, palm oil derivatives are used in some cleaning products, food flavorings and fragrances as well as some small volumes of natural personal care products. In 2019, we achieved 99 percent traceability to the origin refiner and 89 percent traceability to the mill for our priority suppliers, which represented 89 percent of our domestic business palm oil derivative purchases. Batam volume represents approximately 11% of Clorox’s sourced volume.

A comprehensive risk assessment was performed in 2019, identifying High Impact Suppliers, and will be utilized to engage with high our priority suppliers to bring visibility of to their supply chains and support landscape level initiatives.

Forest risk commodity

Palm oil

Country/Area of origin

Indonesia

State or equivalent jurisdiction

Specify state/equivalent jurisdiction

Bitung

% of total production/consumption volume

3

Please explain

The company’s sourcing of palm oil ingredients is limited to derivatives of palm and palm kernel oil. Typically present in very small percentages as sub-components of surfactants, fatty alcohols, emulsifiers or fragrances, palm oil derivatives are used in some cleaning products, food flavorings and fragrances as well as some small volumes of natural personal care products. In 2019, we achieved 99 percent traceability to the origin refiner and 89 percent traceability to the mill for our priority suppliers, which represented 89 percent of our domestic business palm oil derivative purchases. Bitung volume represents approximately 3% of Clorox’s sourced volume.

A comprehensive risk assessment was performed in 2019, identifying High Impact Suppliers, and will be utilized to engage with high our priority suppliers to bring visibility of to their supply chains and support landscape level initiatives.

Forest risk commodity

Palm oil

Country/Area of origin

Malaysia

State or equivalent jurisdiction

Specify state/equivalent jurisdiction

Johor, Pasir Gudang

% of total production/consumption volume

5

Please explain

The company’s sourcing of palm oil ingredients is limited to 99% derivatives of palm and palm kernel oil. Typically present in very small percentages as sub-components of surfactants, fatty alcohols, emulsifiers or fragrances, palm oil derivatives are used in some cleaning products, food flavorings and fragrances as well as some small volumes of natural personal care products. In 2019, we achieved 99 percent traceability to the origin refiner and 89 percent traceability to the mill for our priority suppliers, which represented 89 percent of our domestic business palm oil derivative purchases. Johor, Pasir Gudang volume represents approximately 5% of Clorox’s sourced volume. A comprehensive risk assessment was performed in 2019, identifying High Impact Suppliers, and will be utilized to engage with high our priority suppliers to bring visibility of to their supply chains and support landscape level initiatives.

Forest risk commodity

Palm oil

Country/Area of origin

Malaysia

State or equivalent jurisdiction

Specify state/equivalent jurisdiction

Kuala Lumpur

% of total production/consumption volume

0.5

Please explain

The company’s sourcing of palm oil ingredients is limited to derivatives of palm and palm kernel oil. Typically present in very small percentages as sub-components of surfactants, fatty alcohols, emulsifiers or fragrances, palm oil derivatives are used in some cleaning products, food flavorings and fragrances as well as some small volumes of natural personal care products. In 2019, we achieved 99 percent traceability to the origin refiner and 89 percent traceability to the mill for our priority suppliers, which represented 89 percent of our domestic business palm oil derivative purchases. Kuala Lumpur volume represents approximately 0.5% of Clorox’s sourced volume. A comprehensive risk assessment was performed in 2019, identifying High Impact

Suppliers, and will be utilized to engage with high our priority suppliers to bring visibility of to their supply chains and support landscape level initiatives.

Forest risk commodity

Palm oil

Country/Area of origin

Malaysia

State or equivalent jurisdiction

Specify state/equivalent jurisdiction

Negeri Sembilan

% of total production/consumption volume

0.2

Please explain

The company's sourcing of palm oil ingredients is limited to 99% derivatives of palm and palm kernel oil. Typically present in very small percentages as sub-components of surfactants, fatty alcohols, emulsifiers or fragrances, palm oil derivatives are used in some cleaning products, food flavorings and fragrances as well as some small volumes of natural personal care products. In 2019, we achieved 99 percent traceability to the origin refiner and 89 percent traceability to the mill for our priority suppliers, which represented 89 percent of our domestic business palm oil derivative purchases. Negeri Sembilan volume represents approximately 0.2% of Clorox's sourced volume. A comprehensive risk assessment was performed in 2019, identifying High Impact Suppliers, and will be utilized to engage with high our priority suppliers to bring visibility of to their supply chains and support landscape level initiatives.

Forest risk commodity

Palm oil

Country/Area of origin

Malaysia

State or equivalent jurisdiction

Don't know

% of total production/consumption volume

6

Please explain

The company's sourcing of palm oil ingredients is limited to 99% derivatives of palm and palm kernel oil. Typically present in very small percentages as sub-components of surfactants, fatty alcohols, emulsifiers or fragrances, palm oil derivatives are used in some cleaning products, food flavorings and fragrances as well as some small volumes of natural personal care products. In 2019, we achieved 99 percent traceability to the

origin refiner and 89 percent traceability to the mill for our priority suppliers, which represented 89 percent of our domestic business palm oil derivative purchases. Malaysia volume with an unknown jurisdiction represents approximately 6% of Clorox's sourced volume.

A comprehensive risk assessment was performed in 2019, identifying High Impact Suppliers, and will be utilized to engage with high our priority suppliers to bring visibility of to their supply chains and support landscape level initiatives.

Forest risk commodity

Palm oil

Country/Area of origin

Indonesia

State or equivalent jurisdiction

Specify state/equivalent jurisdiction
Medan

% of total production/consumption volume

0.01

Please explain

The company's sourcing of palm oil ingredients is limited to 99% derivatives of palm and palm kernel oil. Typically present in very small percentages as sub-components of surfactants, fatty alcohols, emulsifiers or fragrances, palm oil derivatives are used in some cleaning products, food flavorings and fragrances as well as some small volumes of natural personal care products. In 2019, we achieved 99 percent traceability to the origin refiner and 89 percent traceability to the mill for our priority suppliers, which represented 89 percent of our domestic business palm oil derivative purchases. Medan volume represents approximately 0.01% of Clorox's sourced volume.

A comprehensive risk assessment was performed in 2019, identifying High Impact Suppliers, and will be utilized to engage with high our priority suppliers to bring visibility of to their supply chains and support landscape level initiatives.

Forest risk commodity

Palm oil

Country/Area of origin

Argentina

State or equivalent jurisdiction

Don't know

% of total production/consumption volume

3.35

Please explain

The company's sourcing of palm oil ingredients is limited to 99% derivatives of palm and palm kernel oil. Typically present in very small percentages as sub-components of surfactants, fatty alcohols, emulsifiers or fragrances, palm oil derivatives are used in some cleaning products, food flavorings and fragrances as well as some small volumes of natural personal care products. In 2019, we achieved 99 percent traceability to the origin refiner and 89 percent traceability to the mill for our priority suppliers, which represented 89 percent of our domestic business palm oil derivative purchases. Argentina volume with an unknown jurisdiction represents approximately 3.35% of Clorox's sourced volume.

A comprehensive risk assessment was performed in 2019, identifying High Impact Suppliers, and will be utilized to engage with high our priority suppliers to bring visibility of to their supply chains and support landscape level initiatives.

Forest risk commodity

Palm oil

Country/Area of origin

Mexico

State or equivalent jurisdiction

Don't know

% of total production/consumption volume

0.23

Please explain

The company's sourcing of palm oil ingredients is limited to 99% derivatives of palm and palm kernel oil. Typically present in very small percentages as sub-components of surfactants, fatty alcohols, emulsifiers or fragrances, palm oil derivatives are used in some cleaning products, food flavorings and fragrances as well as some small volumes of natural personal care products. In 2019, we achieved 99 percent traceability to the origin refiner and 89 percent traceability to the mill for our priority suppliers, which represented 89 percent of our domestic business palm oil derivative purchases. Mexico volume with an unknown jurisdiction represents approximately 0.23% of Clorox's sourced volume.

A comprehensive risk assessment was performed in 2019, identifying High Impact Suppliers, and will be utilized to engage with high our priority suppliers to bring visibility of to their supply chains and support landscape level initiatives.

Forest risk commodity

Palm oil

Country/Area of origin

Malaysia

State or equivalent jurisdiction

Specify state/equivalent jurisdiction

Selangor

% of total production/consumption volume

1.1

Please explain

The company’s sourcing of palm oil ingredients is limited to 99% derivatives of palm and palm kernel oil. Typically present in very small percentages as sub-components of surfactants, fatty alcohols, emulsifiers or fragrances, palm oil derivatives are used in some cleaning products, food flavorings and fragrances as well as some small volumes of natural personal care products. In 2019, we achieved 99 percent traceability to the origin refiner and 89 percent traceability to the mill for our priority suppliers, which represented 89 percent of our domestic business palm oil derivative purchases. Selangor represents approximately 1.1% of Clorox’s sourced volume.

A comprehensive risk assessment was performed in 2019, identifying High Impact Suppliers, and will be utilized to engage with high our priority suppliers to bring visibility of to their supply chains and support landscape level initiatives.

Forest risk commodity

Palm oil

Country/Area of origin

Any other countries/areas

State or equivalent jurisdiction

% of total production/consumption volume

7.75

Please explain

The company’s sourcing of palm oil ingredients is limited to 99% derivatives of palm and palm kernel oil. Typically present in very small percentages as sub-components of surfactants, fatty alcohols, emulsifiers or fragrances, palm oil derivatives are used in some cleaning products, food flavorings and fragrances as well as some small volumes of natural personal care products. In 2019, we achieved 99 percent traceability to the origin refiner and 89 percent traceability to the mill for our priority suppliers, which represented 89 percent of our domestic business palm oil derivative purchases. Of the countries listed in 1.1 but not reported in detail, above:

- Indonesia/Malaysia volume with an unknown jurisdiction represents approximately 5% of Clorox’s sourced volume.
- Chile represents approximately 2.35% of Clorox’s sourced volume

- Costa Rica represents approximately 0.38% Clorox's sourced volume.

A comprehensive risk assessment was performed in 2019, identifying High Impact Suppliers, and will be utilized to engage with high our priority suppliers to bring visibility of to their supply chains and support landscape level initiatives.

Forest risk commodity

Palm oil

Country/Area of origin

Unknown origin

State or equivalent jurisdiction

% of total production/consumption volume

11

Please explain

The company's sourcing of palm oil ingredients is limited to 99% derivatives of palm and palm kernel oil. Typically present in very small percentages as sub-components of surfactants, fatty alcohols, emulsifiers or fragrances, palm oil derivatives are used in some cleaning products, food flavorings and fragrances as well as some small volumes of natural personal care products. We are in the process of confirming the tracing results for approximately 11%, or the remaining of the Clorox sourced volume.

A comprehensive risk assessment was performed in 2019, identifying High Impact Suppliers, and will be utilized to engage with high our priority suppliers to bring visibility of to their supply chains and support landscape level initiatives.

F1.6

(F1.6) Has your organization experienced any detrimental forests-related impacts?

No

F2. Procedures

F2.1

(F2.1) Does your organization undertake a forests-related risk assessment?

Yes, forests-related risks are assessed

F2.1a

(F2.1a) Select the options that best describe your procedures for identifying and assessing forests-related risks.

Timber products

Value chain stage

Direct operations
Supply chain

Coverage

Full

Risk assessment procedure

Assessed as part of an established enterprise risk management framework

Frequency of assessment

Annually

How far into the future are risks considered?

3 to 6 years

Tools and methods used

Internal company methods
Other, please specify
Sedex Radar Risk Tool, Risk Methods

Please explain

Clorox has a comprehensive enterprise risk management that includes identifying risks, assessing exposures and quantifying the value at risk to the company. The evaluation considers level of potential impact, the overall vulnerability to an event based on the time and the capacity to react and adapt, and the likelihood of an occurrence. An Enterprise Risk Management (ERM) Steering Committee is responsible for the management of all company-wide risks, including the our framework and processes; prioritizes and resources; reviews risk identification and risk mitigation strategies; and drives alignment on risk appetite and tolerance. Individual executive risk owners are identified to further Assess risks and develop, monitor, manage and be accountable for mitigation strategies for key risks they own; escalate issues and request resources as appropriate.

Forests-related risks are also assessed by documenting specific details from global fiber suppliers for packaging and wipes to understand their sourcing practices, supply chains, and certifications. The supply base for goods and services used in our products are continually monitored via web crawl technologies through a 3rd party monitoring service, where alerts are provided to company buyers and key contacts if any risk issues are uncovered, including those related to environmental or social non-compliance issues. Responsible Sourcing and Sustainability Program helps us assess our own upstream supply chain against social and environmental impacts by auditing and monitoring to verify compliance and minimize the opportunity for negative social and environmental impacts. We review all suppliers annually to assess inherent risk for third-party auditing. The extensive review includes spend, region and site location, health, safety & hygiene, business ethics, labor standards and environmental risks.

Global direct suppliers are assessed annually through our internal company method. We implemented into our annual review the use of the new Sedex Radar Tool. In addition,

the Sedex Radar Risk Tool is used to prescreen potential suppliers for risk and review biodiversity impact at supplier locations. The biodiversity impact will be reviewed annually starting in 2020 for all high risk global suppliers in our supply chain to determine if an audit is required each year and understand potential risks and action plans.

Palm oil

Value chain stage

Direct operations
Supply chain

Coverage

Full

Risk assessment procedure

Assessed as part of an established enterprise risk management framework

Frequency of assessment

Annually

How far into the future are risks considered?

> 6 years

Tools and methods used

Internal company methods
External consultants
Other, please specify
Risk Methods, Sedex Radar Risk Tool

Please explain

Clorox has a comprehensive enterprise risk management process that includes identifying risks, assessing exposures and quantifying the value at risk to the company. The process considers level of potential impact, the overall vulnerability to an event based on the time and capacity to react and adapt, and the likelihood of an occurrence. An Enterprise Risk Management (ERM) Steering Committee is responsible for the management of all company-wide risks, including the framework and processes; prioritizes and resources; risk identification and mitigation strategies, tactics and assessments; drives alignment on risk appetite and tolerance.

Palm-related risks are also assessed by documenting details from global palm suppliers to understand their sourcing practices, supply chains, and certifications. Our procedures for assessing risks cover the full scope of direct operations value chain and partial supply value chain. The supply base for goods and services used in our products are monitored via web crawl technologies through a 3rd party service; alerts are provided to company buyers and key contacts if any risk issues are uncovered, including those related to environmental or social non-compliance issues.

Our Responsible Sourcing and Sustainability Program helps us assess our upstream supply chain against social and environmental impacts by auditing and monitoring to verify compliance We review all suppliers annually to asses risk for third-party auditing,

including spend, region and site location, health, safety & hygiene, business ethics, labor standards and environmental risks.

Top suppliers are assessed through our internal company method. Our annual review includes the use of the new Sedex Radar Tool. Starling has been incorporated into our palm risk review to evaluate risk in key sourcing regions and high impact supplier identification leading to a thorough risk assessment of our supply base identifying specific regions of environmental and social risks. By utilizing this tool, deforestation areas were identified in real time.

Clorox joined the Areas of Priority Transformation Steering Committee led by Earthworm, a multi-stakeholder group. By leveraging together with other companies, we are able to stop the selling of palm oil to certain mills and move towards training of sustainable palm practices in Indonesia (where most of our palm is sourced).

F2.1b

(F2.1b) Which of the following issues are considered in your organization's forests-related risk assessment(s)?

Availability of forest risk commodities

Relevance & inclusion

Relevant, always included

Please explain

We evaluate availability of forest risk commodities on an ongoing basis through close collaboration with our suppliers. Through Market Intelligence sources and Supplier Relationship Management practices, key suppliers are monitored and open communication is employed to understand all aspects of the market dynamics, including material availability, pricing, and emerging trends. Our risk management service uses web-crawl technology to monitor and alert in near real time all forest commodity locations and suppliers in our supply chain to ensure upsets or issues are quickly identified and appropriately addressed by the sourcing team. Buyers are routinely trained on Responsible Sourcing and Sustainability commitments, material standards are managed to ensure compliance, and suppliers are trained and engaged to ensure we meet our policy commitments. We routinely engage and survey the full supply base of fiber and palm ingredient suppliers to raise awareness, communicate our commitments, query them on practices, and solicit appropriate certifications (FSC, SFI, RSPO, etc.) for forest commodity materials provided to Clorox. This ensures compliance and helps us to identify any actions needed to close gaps in support of our commitments. Declaration Letters were requested for 2019 data resulting in suppliers providing a more detailed description of their sourcing practices and certifications. This new procedure has brought more transparency into our supply chain for fiber which includes primary and secondary packaging and substrates for our wipes.

Quality of forest risk commodities

Relevance & inclusion

Relevant, always included

Please explain

We constantly evaluate quality related issues, and all our raw material and contract manufacturing suppliers are evaluated, assessed, and audited as appropriate as part of our Supplier Quality Management (SQM) Program. The SQM process informs Supplier Selection, Supplier Approval, Supplier Integration, and Supplier Performance Management. Quality issues identified during onsite audits are captured in audit reports by the Clorox Quality Audit teams and corrective actions are implemented and tracked via formal Corrective and Preventative Actions (CAPA) reports.

Impact of activity on the status of ecosystems and habitats

Relevance & inclusion

Relevant, always included

Please explain

This risk is a key driver of our corporate commitments related to forest risk commodities. In looking at the forest commodities in our supply chain, we've identified wood-based fiber use and sourcing for our packaging as an area where we can have an impact on reducing the pressure on natural forests. Our strategy leads with reducing the amount of fiber we use. Next, we strive to maximize recycled fiber to meet our needs. When virgin fiber is required, we seek sustainable forestry certifications to ensure responsible forestry practices have been followed. In addition, we recognize that responsibly sourcing of palm oil ingredients plays a key role in protecting human rights while conserving the environment including our forests. Clorox's palm ingredient volume represents less than 0.003 percent of palm oil produced globally each year. Given that our impact is relatively small on a global scale, we believe the most effective way to influence progress in the supply chain is through collaboration and partnership with suppliers, consumer packaged goods peers and nongovernmental organizations. We're working with our suppliers to ensure the palm oil and derivative ingredients in our products are from responsible sources.

Our commitment for palm oil ingredient sourcing addresses key areas: deforestation and peatland protection, business ethics and human rights, and traceability. Clorox has continued working with the Earthworm Foundation on traceability efforts and on-the-ground transformation. In June 2019, we expanded our annual support for Priority Areas for Transformation (APT). APT is a program focused on land-use planning within the highly biodiverse Leuser Ecosystem in Indonesia that allows members and other participating stakeholders (local communities, civil society, smallholders, industry and government) to work together to bring about sustainable economic growth while protecting a critical ecosystem. By working with a multi-stakeholder group, we are now able to work to immediately stop the selling of palm oil to certain mills by working together to educate bad actors on expectations for the industry and move towards training of sustainable palm practices in Indonesia (where most our palm is sourced). Finally, an analysis of our supply chain was performed to identify 932 mills in our supply chain and understanding the level of risk for each region.

Regulation

Relevance & inclusion

Relevant, always included

Please explain

The changes in regulation of forest risk commodities exposure is monitored by our Responsible Sourcing and Legal teams. This is important information to ensure our global sourcing practices and strategies for our forest commodities are in compliance, and supplier selection criteria and supplier management are appropriate.

Climate change

Relevance & inclusion

Relevant, always included

Please explain

Our newly designated Sustainability Center closely monitors, tracks, and reports on our GHG commitments, including continued commitments for energy, GHG and water reductions and our 2030 Ignite Goals; 50% combined reduction in virgin plastic and fiber packaging by 2030, 100% recyclable, reusable or compostable packaging by 2025, science-based targets (SBT) to reduce GHG emissions, and 100% renewable electricity in the U.S. and Canada.

In 2019 Clorox joined the CDP Supply Chain Engagement Program to further enhance our ability to understand and work with our top suppliers on managing environmental impact, including climate change, and to help us achieve our 2030 SBT GHG emission goals. . Currently we are engaging our top suppliers (representing ~75% of spend) to join CDP Supply Chain. We educate them at least annually to understand their practices and goals, and to encourage and assist in driving their results related to carbon emissions reduction. Starling is used for palm through risk assessments throughout our supply chain. By reviewing the regions where we source, we can monitor real time deforestation and work with multi-stakeholders to stop bad actors in specific regions. In addition, we are helping the communities by educating them on sustainable practices protecting the environment and the people in those regions.

Impact on water security

Relevance & inclusion

Relevant, always included

Please explain

We consider the impact of deforestation on water security in all the areas in which we operate and source from as reducing deforestation helps prevent floods and drought by regulating regional rainfall. Trees are important to the water cycle. They absorb rain fall and produce water vapor that is released into the atmosphere. Trees also reduce the amount of pollutants in water by stopping polluted water runoff. Studies show that in high risk areas of the Amazon, greater than 50% of the water in the ecosystem is held within its trees so preventing deforestation is crucial to the preservation of these eco-systems.

Tariffs or price increases

Relevance & inclusion

Relevant, always included

Please explain

The risk of tariff or price increases is continually monitored by the Global Strategic Sourcing team as part of our Supplier Relationship Management program. This occurs through close collaboration with existing or potential suppliers, and responsible sourcing teams leveraging all market intelligence available to assess the risk and appropriate strategies for all key commodities, including forest risk commodities. Risks and potential mitigating actions are built into category/sourcing strategies shared with Sourcing management and Business Unit leadership to determine appropriate actions. In addition, the sourcing team continually monitors and is alerted by our active risk monitoring service of the potential for tariff or other factors that might be relevant to price impacts in our forest commodity supply chains. For ingredients containing palm materials the Sourcing team assesses the availability and cost premiums associated with physically certified materials in our derivative supply chain to communicate operational impacts with current and future goals.

Loss of markets

Relevance & inclusion

Relevant, always included

Please explain

Clorox monitors and considers consumer feedback regarding key issues, including deforestation to inform market plans and for setting appropriate CR commitments/goals.

Brand damage related to forest risk commodities

Relevance & inclusion

Relevant, always included

Please explain

A major risk factor in determining appropriate CR actions and goals is minimizing potential for brand damage related to commodities in our supply chain, including any and all deforestation concerns. As such Clorox has implemented both public and internal commitments aimed at ensuring all our forest commodities are always sourced responsibly. This drives internal sourcing, tracking, and reporting actions; and external activity such as working with NGO partners like Earthworm - to better understand our palm supply chain so we can drive overall industry change, ensure our suppliers share our commitments, and immediately address issues with suppliers at any level in our supply chain.

Corruption

Relevance & inclusion

Relevant, always included

Please explain

The Clorox Company and its wholly owned subsidiaries worldwide have a strong commitment to responsible business practices. Operating honestly and ethically and treating people with dignity, respect and equal opportunity have been cornerstones of our company since it was founded in 1913. We expect our business partners' practices to reflect our own. We have a Business Partner Code of Conduct detailing business practice standards for our direct suppliers of goods, service providers, consultants, distributors, licensees, joint ventures, contractors and temporary workers. Business partners must commit to the highest standards of ethical conduct and fair business practices. Business partners must Not Give or Accept Illegal Payments or Engage in Corruption: Business partners must not pay or offer to pay anything of value to any government official, including an officer, employee or consultant of a government or governmental department or agency, officer or employee of a state-owned enterprise or partially state-owned enterprise, political party or official, candidate for political office, officer or employee of a public international organization, or the spouse or immediate family members of any of the persons mentioned above, or any other person for the purpose of improperly influencing such person or obtaining or retaining business. Business partners must fully comply with the U.S. Foreign Corrupt Practices Act, the UK Bribery Act and other applicable corruption laws. Business partners may also not accept or request such unlawful payments. More than 85% of spend is with suppliers who are either contractually obligated or have self-certified acceptance of the Code, or have publicly shared corporate principals that align with the Clorox BPCOC. An internal Risk Assessment all direct material suppliers, including all forest risk commodities are conducted annually and third-party audits (SMETA 4-Pillar Audits preferred) are initiated for high-risk suppliers. This tool was formally implemented and well documented to ensure a thorough process was established to identify risks in our supply chain including forest related risks. Leadership and all timber buyers were trained on the importance of the Business Partner Code of Conduct and best practices for sourcing requirements to ensure no deforestation in our supply chain.

Social impacts

Relevance & inclusion

Relevant, always included

Please explain

Social Risks are assessed as part of our Enterprise Risk Management Program, through monitoring by our Global Strategic Sourcing (GSS) team and through our partnership with Earthworm Foundation. We evaluate our supply chain utilizing several tools to identify social issues and the actions needed to ensure responsible sourcing practices in response to social issues. Tools include our formal Responsible Sourcing Social Compliance Audit Risk Assessment, Sedex Radar Risk Tool and our internal Risk Methods (a web crawl technology) for reviewing various risks in our supply chain. In addition, we are members of AIM Progress, NASPON, RSPO and actively participate and collaborate with other CPG's. With these memberships, mutual recognition of social compliance audits can be shared along with Ecovadis assessments of suppliers allowing for more insight and mitigating risk in our supply chain. As part of our engagement with Earthworm, we are engaging with our primary suppliers of palm

derivative ingredients to educate and collaborate on palm supply chain issues, including social issues.

Our commitment for palm oil ingredient sourcing addresses three key areas: deforestation and peatland protection, business ethics and human rights, and traceability. Clorox has continued working with our implementation partner, Earthworm Foundation on traceability efforts, and on-the-ground transformation. In June 2019, we renewed and expanded our annual support for Priority Areas for Transformation (APT) by joining the steering committee engaging with multi-stakeholders creating one voice of change for the regions.

Other, please specify

Relevance & inclusion

Please explain

F2.1c

(F2.1c) Which of the following stakeholders are considered in your organization's forests-related risk assessments?

Customers

Relevance & inclusion

Relevant, always included

Please explain

Customers are included in our forest related risk assessments and we work with our strategic customers on key issues related to deforestation. We collaborate with our customers on important sustainability initiatives. Collaborating with our customers on sustainability-related initiatives is important to us and we are committed to working with all parts of our supply chain to address deforestation. An example of this collaboration is our involvement with Walmart's Project Gigaton Initiative. Working with our customers to address forest-related risks has a positive impact on the supply chains of our forest-related commodities as well as positive brand and reputational benefits both for our company and our customers.

Employees

Relevance & inclusion

Relevant, always included

Please explain

We are committed to promoting sustainability across our company, including through employee engagement. We have a company-wide employee eco network, The Eco Warriors, with teams at our office and manufacturing sites, assist in increasing awareness on our company's eco-goals and commitments including our forest-related goals and commitments to improve the sustainability of our palm supply chain, ensure

that 100% of our packaging fiber is from certified virgin or recycled sources, achieve 50% combined reduction in virgin plastic and fiber packaging by 2030, and achieve 100% recyclable, reusable or compostable packaging by 2025. These topics are also included in our company-wide quarterly town hall meetings.

Investors

Relevance & inclusion

Relevant, always included

Please explain

As our investors and stakeholders are increasingly concerned with responsible sourcing practices and the risks related to deforestation, we work to ensure that our deforestation commitments are robust. We review requests from investors and work to prioritize our commitments to ensure we address the areas of greatest concern to our investors, customers, NGO's and other stakeholders. Ensuring that investors are included in our risk assessment helps to protect our reputational risk as a company and the reputation of our brands.

Local communities

Relevance & inclusion

Relevant, always included

Please explain

The impact on local communities is an important part of our Forests risk assessment. One of our focus areas is our palm derivatives supply chain. Clorox has continued working with our implementation partner, Earthworm Foundation (formerly The Forest Trust) on traceability efforts, and on-the-ground transformation. In June 2019, we renewed and expanded our annual support for Priority Areas for Transformation (APT). APT is a program focused on land-use planning within the highly biodiverse Leuser Ecosystem in Indonesia that allows program members and other participating stakeholders—including local communities, civil society, smallholders, industry and government—to work together to bring about sustainable economic growth while protecting a critical ecosystem.

NGOs

Relevance & inclusion

Relevant, always included

Please explain

Including NGOs in our risk assessment helps us to address environmental and social risks as well as mitigate potential reputational and brand risk for the company. Our Corporate Eco Team, Corporate Risk Team and our Global Strategic Sourcing team stay abreast of NGO initiatives and focus areas to evaluate for relevance to our forest-related supply chain. We work closely with NGO's such as Earthworm Foundation on issues related to our supply chain to ensure that our sourcing strategy adequately addresses the environmental and social risks.

Other forest risk commodity users/producers at a local level

Relevance & inclusion

Relevant, always included

Please explain

Clorox has continued working with our implementation partner, Earthworm Foundation on traceability efforts, and on-the-ground transformation. In June 2019, we renewed and expanded our annual support for Priority Areas for Transformation (APT). APT is a program focused on land-use planning within the highly biodiverse Leuser Ecosystem in Indonesia that allows program members and other participating stakeholders—including local communities, civil society, smallholders, industry and government—to work together to bring about sustainable economic growth while protecting a critical ecosystem.

Regulators

Relevance & inclusion

Relevant, always included

Please explain

Both our Regulatory Affairs and Global Strategic sourcing team work to ensure that our risk assessment includes regulators. We consider regulations such as the Lacey Act for Timber and various other country specific regulations, specifically in high risk countries like Brazil. We ensure that our contracts and Business Partner Code of conduct references applicable forest related regulations.

Suppliers

Relevance & inclusion

Relevant, always included

Please explain

We engage with our key suppliers of forest commodities to ensure they are aware of our forest-related goals related to the sustainability and responsible sourcing of our palm supply chain and our timber-sourced packaging material. Information is shared through on-on-one supplier meetings and included as part of our supplier survey. In addition, we work directly with key suppliers of our palm derivative ingredients on specific traceability and other improvement projects through collaboration with Earthworm Foundation. This engagement includes working with key suppliers to analyze their palm related risk exposure based ownership and known plantation connections. Our engagement also includes working with our suppliers to develop multi-year improvement and action plans to address any potential risks or opportunities identified.

Other stakeholders, please specify

Relevance & inclusion

Please explain

F3. Risks and opportunities

F3.1

(F3.1) Have you identified any inherent forests-related risks with the potential to have a substantive financial or strategic impact on your business?

	Risk identified?
Timber products	Yes
Palm oil	Yes

F3.1a

(F3.1a) How does your organization define substantive financial or strategic impact on your business?

Clorox has enterprise risk management (ERM) processes to identify, assess and prioritize business risks. Clorox uses a systematic process to evaluate risks. The process includes identifying risks, assessing exposures and quantifying the value at risk to the company. The evaluation considers level of potential impact, the overall vulnerability to an event based on the time and our capacity to react and adapt, and the likelihood of an occurrence. Clorox’s Enterprise Risk Management Program evaluates risks associated with the Company based on a number of criteria, which include but are not limited to quantitative definitions such as cumulative impact to pre-tax earnings and shareholder impact from a share price/market capitalization volatility standpoint and other qualitative definitions such as reputation/brand equity, customer and consumer impact. For each of these criteria, Clorox’s ERM program has established a 5 point scale from very low to very high and risks are evaluated across all the criteria/definitions. A substantive risk is one where the impact is medium to high across a number of criteria and has a high likelihood to disrupt our ability to operate our business. From an ERM perspective, we do not believe that forest-risk commodities pose a substantive risk to our business. We believe our dispersed supply chain affords us redundancy, which mitigates risk to our business from localized events. However, we do believe forest risk commodities pose a strategic risk to our company, its values and its commitment to corporate responsibility. We believe our short and long-term success lies in our focus on driving good-growth, growth that is not just profitable and sustainable, but also achieved responsibly. At Clorox, addressing deforestation and its impact on climate change is an important aspect of conducting business responsibly

F3.1b

(F3.1b) For your disclosed forest risk commodity(ies), provide details of risks identified with the potential to have a substantive financial or strategic impact on your business, and your response to those risks.

Forest risk commodity

Timber products

Type of risk

Reputational and markets

Geographical scale

Global

Where in your value chain does the risk driver occur?

Supply chain

Primary risk driver

Increased stakeholder concern or negative stakeholder feedback

Primary potential impact

Reduced demand for products and services

Company-specific description

Currently 99% of all fiber-based packaging we source (cartons, corrugates, displays and bags) to be made with either recycled or certified virgin fiber. In 2019 we established a new goal for a 50% combined reduction in virgin plastic and fiber packaging by 2030. If there is an increased demand for certified sustainable fiber or if certified sustainable fiber is not as readily available in certain regions, there is a risk that we may not be able to meet our goal and that we would have to increase our use of uncertified virgin fiber to meet our production needs. Should there be an issue related to our uncertified virgin fiber volume (rather it remains the same or increases due to decreased availability) related to sourcing, regulatory compliance or other issues that might pose a reputational risk with our stakeholders such as customers and consumers, there is the potential for reduced demand for our goods and services.

Timeframe

>6 years

Magnitude of potential impact

Low

Likelihood

Very unlikely

Are you able to provide a potential financial impact figure?

Yes, an estimated range

Potential financial impact (currency)

Potential financial impact figure - minimum (currency)

600,000

Potential financial impact figure - maximum (currency)

3,000,000

Explanation of financial

Our Timber supply chain is mature and the availability of certified virgin material is not an area of high risk or concern at this time. Should availability become an issue, brand reputation could be negatively impacted if there is shortage of certified virgin material. Negative publicity related to issues with our timber supply chain could translate to decreased demand for our products with a resulting decrease in sales. The potential estimated decrease in sales could be in the range of 0.01% to 0.05% of company sales or \$600,000 to \$3,000,000 dollars.

Primary response to risk

Engagement with suppliers

Description of response

Currently 99% of all fiber-based packaging we source is made with either recycled or certified virgin fiber. In 2019 we established a new goal for a 50% combined reduction in virgin plastic and fiber packaging by 2030. If there is an increased demand for certified sustainable fiber or if certified sustainable fiber is not available in certain regions, we have a risk that we may not be able to meet our goal and there is a negative impact to our brand and reputation as a result our timber supply chain risks.

We engage with our suppliers to understand availability and cost implications of certified virgin fiber for our packaging as well as the future outlook of the timber markets in the regions in which we operate and source from.

We assess the deforestation risk and approach to managing risk in the supply chains of the timber-based materials in our Wipes business and mill wood residuals and by-products in our Kingsford business. This includes but is not limited to ensuring the timber materials used in our wipes and charcoal products are from certified sources or sourced from geographic regions where deforestation risk is low. In addition we monitor our supply base for goods and services that are used in our products via web crawl technologies via a 3rd party service, which alerts buyers and key business contacts if any image and compliance risk issues are reported among our direct suppliers. This would allow for swift and decisive remediation actions if needed.

Cost of response

0

Explanation of cost of response

Costs associated with supplier engagement are included in our standard Supplier Relationship Management (SRM) program practiced by our Global Strategic Sourcing team. This ensures awareness of market dynamics and changes that could potentially impact our ability to deliver on our forest commodity commitments. Any response to issues, or necessary changes in supply chain source, are anticipated to be within the scope of responsibilities of existing commodity sourcing managers. As there are no additional costs, the cost of response is \$0 dollars.

Forest risk commodity

Palm oil

Type of risk

Reputational and markets

Geographical scale

Global

Where in your value chain does the risk driver occur?

Supply chain

Primary risk driver

Availability of certified sustainable material

Primary potential impact

Increased operating costs

Company-specific description

We have established commitments that all our palm oil ingredients responsibly sourced. In support of this goal, Clorox is a member of the Roundtable on Sustainable Palm Oil (RSPO) and continues to develop appropriate plans of action in accordance with the framework of the RSPO process, to promote the RSPO and sustainable palm oil production, procurement and consumption. Directly sourcing only derivative palm ingredients adds complexity and cost to the objective of sourcing only RSPO certified materials. We continue to work with our existing suppliers and engage new suppliers in an effort to bring availability of competitively priced certified palm ingredients to market. We recognize there is a risk that we may have to pay a premium for palm oil ingredients that meet our requirements.

Timeframe

1-3 years

Magnitude of potential impact

Low

Likelihood

More likely than not

Are you able to provide a potential financial impact figure?

Yes, an estimated range

Potential financial impact (currency)

Potential financial impact figure - minimum (currency)

2,000,000

Potential financial impact figure - maximum (currency)

2,500,000

Explanation of financial

Primary response to risk

Engagement with suppliers

Description of response

The cost impact related to directly sourcing only certified RSPO palm oil has been estimated to be in the range of \$2 Million to \$2.5 Million USD. We expect this cost to decrease in time as the availability of Certified Sustainable Palm Oil (CSPO) becomes more widely available in accordance with the RSPO mission to transform markets to make sustainable palm oil the norm.

Cost of response

250,000

Explanation of cost of response

Costs for NGO and other organizational memberships and support, along with potential new supplier engagements and new material validations are estimated as part of the response associated with this risk.

F3.2

(F3.2) Have you identified any forests-related opportunities with the potential to have a substantive financial or strategic impact on your business?

	Have you identified opportunities?
Timber products	Yes
Palm oil	Yes

F3.2a

(F3.2a) For your selected forest risk commodity(ies), provide details of the identified opportunities with the potential to have a substantive financial or strategic impact on your business.

Forest risk commodity

Timber products

Type of opportunity

Markets

Where in your value chain does the opportunity occur?

Supply chain

Primary forests-related opportunity

Increased demand for certified materials

Company-specific description & strategy to realize opportunity

Currently 99% of all fiber-based packaging we source (cartons, corrugates, displays and bags) to be made with either recycled or certified virgin fiber. In 2019 we established a new goal for a 50% combined reduction in virgin plastic and fiber packaging by 2030. These goals are global in nature, and the main opportunity we would derive is increased collaboration with our supply chain partners and driving demand for increasing capacity in sustainable timber commodities.

Our strategy to achieve and maintain these goals is to collaborate with our supply chain partners and raw material suppliers. We report our status and progress as part of our CR communication strategy.

Estimated timeframe for realization

1-3 years

Magnitude of potential impact

Low

Likelihood

More likely than not

Are you able to provide a potential financial impact figure?

Yes, a single figure estimate

Potential financial impact figure (currency)

0

Potential financial impact figure – minimum (currency)

Potential financial impact figure – maximum (currency)

Explanation of financial impact figure

No financial impact is anticipated since this opportunity is part of our overall strategy for ensuring we achieve our goal of having only sustainably sourced, certified virgin or recyclable fiber in our packaging. We currently engage our suppliers to ensure the fiber we purchase meets our requirements. We have assigned a value of \$0 dollars for potential financial impact, understanding that the certification may increase our procurement costs by 2-4%.

Forest risk commodity

Palm oil

Type of opportunity

Markets

Where in your value chain does the opportunity occur?

Supply chain

Primary forests-related opportunity

Increased availability of products with reduced environmental impact (other than certified products)

Company-specific description & strategy to realize opportunity

The main opportunity we would derive is increased collaboration with our supply chain partners, increasing transparency and driving demand for increasing capacity in sustainable palm oil commodities. Our approach to identify key points in the supply chain where we can influence change and support transformation activities on the ground is working. Through our mapping work with our direct suppliers, we annually meet with our priority suppliers to communicate our sourcing commitments upstream and ensure that our requirements are understood by stakeholders able to influence change on the ground. We also inform all palm suppliers each year of palm commitments. We have made great progress ensuring that our priority suppliers understand our commitment and assist them with creating a policy or commitment if they do not have a public commitment. In June 2019, we renewed and expanded our annual support for Priority Areas for Transformation (APT). APT is a program focused on land-use planning within the highly biodiverse Leuser Ecosystem in Indonesia that allows program members and other participating stakeholders—including local communities, civil society, smallholders, industry and government—to work together to bring about sustainable economic growth while protecting a critical ecosystem. We selected this area as 71% of our palm oil is sourced from Indonesia.

In addition, we have joined the APT Steering Committee demonstrating leadership and direction on investment opportunities based on risk in the Aceh Tamieng region. Supporting this program resulted in engagement with over 250 direct farmers and over 50 individual companies/mills were trained on social/labor and environmental issues. The APT Program supported 2095 households directly impacted by Participatory Conservation Plans in 6 forest-frontier villages, 3 agricultural demonstration plots providing continuous rural training opportunities, 245 people directly trained through Livelihood Programs, 1400 hectares HCV/HCS forest mapped and protected, 12 concessions and 2 mills newly covered under Forest Protection agreements. In addition, 3000+ workers are now covered by No Exploitation agreements, 87% of target companies (26 of 30) provided with labor training in 1 district, Collective Action Plan was developed and agreed upon with government, covering 36 plantations and 10 mills.

Estimated timeframe for realization

1-3 years

Magnitude of potential impact

Low

Likelihood

More likely than not

Are you able to provide a potential financial impact figure?

Yes, an estimated range

Potential financial impact figure (currency)

Potential financial impact figure – minimum (currency)

2,000,000

Potential financial impact figure – maximum (currency)

25,000,000

Explanation of financial impact figure

Based on our current estimated cost premiums to procure 100% certified palm ingredients, the financial impact would translate to a savings of \$2 Million to \$2.5 Million dollars by eliminating premiums for certified ingredients under an open market scenario.

Forest risk commodity

Palm oil

Type of opportunity

Products & services

Where in your value chain does the opportunity occur?

Supply chain

Primary forests-related opportunity

Increased supply chain transparency

Company-specific description & strategy to realize opportunity

We have a goal that all our palm / palm kernel oil ingredients are traceable and responsibly sourced by 2020. We are partnering with Earthworm/The Forest Trust (TFT) and our current suppliers of palm oil ingredients on a plan to help ensure that the ingredients used in our products meet our comprehensive responsible sourcing commitments, including criteria around traceability, deforestation, peatland preservation and high-carbon stock forest conservation, and business ethics and human rights. These goals are global in nature, and the main opportunity we would derive is increased collaboration with our supply chain partners, increasing transparency and driving demand for increasing capacity in sustainable palm oil commodities.

Our strategy to achieve these goals is to partner with TFT and collaborate with our supply chain partners and raw material suppliers to ensure we meet these goals. We plan to report our progress as part of our CR communication strategy.

Our approach is to identify key points in the supply chain where we can influence change and support transformation activities on the ground. Through our mapping work with our direct suppliers, we will be able to communicate our sourcing commitments upstream and ensure that our requirements are understood by stakeholders able to influence change on the ground. Given Clorox's place downstream in the supply chain, we will be most directly linked to the first importers. We will work closely with them to understand how they are driving change with their direct suppliers in the countries of palm oil production (usually origin refineries).

Estimated timeframe for realization

4-6 years

Magnitude of potential impact

Low

Likelihood

More likely than not

Are you able to provide a potential financial impact figure?

No, we do not have this figure

Potential financial impact figure (currency)

Potential financial impact figure – minimum (currency)

Potential financial impact figure – maximum (currency)

Explanation of financial impact figure

We did not estimate the financial impact for this opportunity.

Forest risk commodity

Type of opportunity

Products & services

Where in your value chain does the opportunity occur?

Supply chain

Primary forests-related opportunity

Increased supply chain transparency

Company-specific description & strategy to realize opportunity

Clorox has a plan to source all of our palm oil sustainably. Clorox is a member of the Roundtable on Sustainable Palm Oil (RSPO) and supports RSPO standards and certification as a means to drive sustainable palm oil. We also seek to ensure that our use of palm derived ingredients do not contribute to deforestation, peat clearance and human rights abuses. Our commitments include:

- Source CSPO for palm oil and its derivatives through RSPO physical supply chains by 2025,
- Ensure suppliers sourcing palm oil and palm kernel oil in our supply chain have public sustainable palm oil commitments aligned with the RSPO Principles and Criteria, including what is commonly referred to as NDPE (No Deforestation, No Peat and No Exploitation):
- Continue to hold suppliers accountable to the principles outlined in our Business Partner Code of Conduct, including compliance with all applicable laws and regulations in the countries of operation, and respect for human rights throughout the value chain.
- Continue mapping, tracing and/or monitoring the supply chain of our palm ingredient

suppliers and ensure adherence to Clorox and their own sourcing commitments and practices.

- Continue engaging with our suppliers, industry peers, shareholders, non-governmental organizations and other stakeholders to promote sustainable palm oil supply chains, including collaborations to strengthen certification and verification mechanisms.
- Report annually on our progress against these commitments.

These commitments apply to all palm oil ingredients we purchase globally. Our ability to achieve these commitments depends heavily on the changing practices of the palm industry and the future market availability of the palm derivatives used in our products. Our strategy to achieve these goals is to partner with Earthworm Foundation and collaborate with our supply chain partners and raw material suppliers. We plan to report our progress as part of our CR communication strategy.

Our approach is to identify key points in the supply chain where we can influence change and support transformation activities on the ground. Through our mapping work with our direct suppliers, we will be able to communicate our sourcing commitments upstream and ensure that our requirements are understood by stakeholders able to influence change on the ground.

Estimated timeframe for realization

4-6 years

Magnitude of potential impact

Low

Likelihood

More likely than not

Are you able to provide a potential financial impact figure?

Yes, a single figure estimate

Potential financial impact figure (currency)

125,000

Potential financial impact figure – minimum (currency)

Potential financial impact figure – maximum (currency)

Explanation of financial impact figure

The financial impact of \$125,000 includes the current yearly cost to Clorox for traceability work with our suppliers and industry partners.

F4. Governance

F4.1

(F4.1) Is there board-level oversight of forests-related issues within your organization?

Yes

F4.1a

(F4.1a) Identify the position(s) of the individual(s) (do not include any names) on the board with responsibility for forests-related issues.

Position of individual	Please explain
Board-level committee	<p>The highest level of responsibility for climate change at the Clorox Company, rests with the company’s Board of Directors’ Nominating, Governance and Corporate Responsibility Committee, which oversees Clorox’s environmental matters and compliance and is updated at least quarterly on ESG- related priorities, including, as appropriate, those related to climate change.</p> <p>The company’s Executive Committee, a group made up of the company’s most senior leaders, including the CEO, is responsible for overseeing the execution of our business strategy, driving ESG priorities including forest related issues. Clorox is committed to strong governance, working to tie elements of ESG goals to executive compensation awards. Key ESG roles on the Executive Committee include the ESG Executive Sponsor: Executive Vice President – General Counsel and Corporate Affairs and Sustainability Executive Sponsor: Executive Vice President - Household & Lifestyle, to whom the Chief Sustainability Officer reports.</p>

F4.1b

(F4.1b) Provide further details on the board’s oversight of forests-related issues.

	Frequency that forests-related issues are a scheduled agenda item	Governance mechanisms into which forests-related issues are integrated	Please explain
Row 1	Scheduled - some meetings	Monitoring implementation and performance Reviewing and guiding corporate responsibility strategy Reviewing and guiding risk management policies Reviewing and guiding strategy	At Clorox, we take issues related to Climate Change very seriously. Environmental sustainability is an integral part of our overall Corporate Business Strategy. The highest level of responsibility for climate change rests with the Board of Directors Nominating, Governance and Corporate Responsibility Committee, which oversees Clorox’s environmental matters and compliance and is updated at least quarterly on ESG- related priorities, including, as appropriate, those related to forest issues.

F4.2

(F4.2) Provide the highest management-level position(s) or committee(s) with responsibility for forests-related issues (do not include the names of individuals).

Name of the position(s) and/or committee(s)	Responsibility	Frequency of reporting to the board on forests-related issues	Please explain
Chief Executive Officer (CEO)	Both assessing and managing forests-related risks and opportunities	Quarterly	<p>The highest level of responsibility for climate change at the Clorox Company, rests with the company’s Board of Directors’ Nominating, Governance and Corporate Responsibility Committee, which oversees Clorox’s environmental matters and compliance and is updated at least quarterly on ESG- related priorities, including, as appropriate, those related to climate change.</p> <p>The company’s Executive Committee, a group made up of the company’s most senior leaders, including the CEO, is responsible for overseeing the execution of our business strategy, driving ESG priorities, including forest related issues. Clorox is committed to strong governance and ESG performance and is working to tie elements of ESG goals to executive compensation awards.</p> <p>Key ESG roles on the Executive Committee include the ESG Executive Sponsor: Executive Vice President – General Counsel and Corporate Affairs and Sustainability Executive Sponsor: Executive Vice President - Household & Lifestyle, to whom the Chief Sustainability Officer reports.</p>
Other, please specify Executive Vice President – General Counsel and Corporate Affairs	Both assessing and managing forests-related risks and opportunities	Quarterly	<p>The highest level of responsibility for climate change at the Clorox Company, rests with the company’s Board of Directors’ Nominating, Governance and Corporate Responsibility Committee, which oversees Clorox’s environmental matters and compliance and is updated at least quarterly on ESG- related priorities,</p>

			<p>including, as appropriate, those related to climate change.</p> <p>The company’s Executive Committee, a group made up of the company’s most senior leaders, including the CEO, is responsible for overseeing the execution of our business strategy, driving ESG priorities, including forest related issues. Clorox is committed to strong governance and ESG performance and is working to tie elements of ESG goals to executive compensation awards.</p> <p>Key ESG roles on the Executive Committee include the ESG Executive Sponsor: Executive Vice President – General Counsel and Corporate Affairs and Sustainability Executive Sponsor: Executive Vice President - Household & Lifestyle, to whom the Chief Sustainability Officer reports.</p>
Risk committee	Assessing forests-related risks and opportunities	Annually	<p>An Enterprise Risk Management (ERM) Steering Committee, consisting of senior leaders across the organization, was established to provide a sustainable framework to proactively identify, understand, assess, prioritize, articulate and continuously manage risks, both existing and emerging, across the entire organization, including climate risks. The ERM office reports directly to the company Board of Directors and provides the Board key ERM updates, including reporting on ESG risks, at least annually, which includes forest related risks.</p>
Other, please specify Executive Vice President - Household & Lifestyle	Both assessing and managing forests-related risks and opportunities	As important matters arise	<p>The Executive Vice President – Household & Lifestyle functions as the Executive Sponsor for Sustainability and owns the environmental aspects of the company’s ESG strategy. The VP / Chief Sustainability Officer reports into this role for all Sustainability matters.</p>
Chief Sustainability Officer (CSO)	Both assessing and managing forests-related	Not reported to board	<p>The CSO leads our Sustainability Center and is responsible for making sustainability-</p>

	risks and opportunities		related recommendations to the Executive Sponsor for Sustainability.
Sustainability committee	Both assessing and managing forests-related risks and opportunities	Not reported to board	The Sustainability Center is a team reporting to the CSO, responsible for driving the company’s corporate environmental priorities and enabling business units as they more deeply integrate sustainability into their own strategies. The Sustainability Center builds organizational capability and leads strategic enterprise-wide actions for speed and scale. The Sustainability Center’s leadership team includes VP to Senior Director level members responsible for commercialization, technology, operations and supply chain, and strategy and performance, with roles supported by teams connected into the core functions. This team has responsibilities for sustainability for the company, which includes water stewardship. The strategy and performance lead in the Sustainability Center works with our Risk Management team to ensure water related risks are incorporated into our enterprise risk

F4.3

(F4.3) Do you provide incentives to C-suite employees or board members for the management of forests-related issues?

	Provide incentives for management of forests-related issues	Comment
Row 1	No, and we do not plan to introduce them in the next two years	In 2019, Clorox announced Integrated Environmental Sustainability, and Governance (ESG) Goals, called IGNITE Goals. These goals include “Enhance our leadership in ESG through an unwavering commitment to strong corporate governance and ESG performance overseen by the board of directors.” This goal is supported by establishing executive compensation awards that are tied to elements of our ESG goals for members of the Clorox executive committee, including for the chair and CEO. While none of the IGNITE Goals are directly tied to water, the Board Members do ensure that the company is addressing any forest related issues, including monitoring and addressing any significant forest risks, as part of their overall responsibilities.

		Incentives for Forest related issues are included in the compensation awards for other non-c suite managers, including the Chief Sustainability Officer and the Sustainability Center
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F4.4

(F4.4) Did your organization include information about its response to forests-related risks in its most recent mainstream financial report?

Yes (you may attach the report – this is optional)

📎 CLX-2019-Integrated Report-Final-9.30.19.pdf

💬 Clorox’s annual report discusses our forest related goals on page 49 and identifies forest related risks in the GRI section on Environmental & Social Impacts of Palm.

F4.5

(F4.5) Does your organization have a policy that includes forests-related issues?

Yes, we have a documented forests policy that is publicly available

F4.5a

(F4.5a) Select the options to describe the scope and content of your policy.

	Scope	Content	Please explain
Row 1	Company-wide	Commitment to eliminate deforestation Commitment to protect rights and livelihoods of local communities Commitments beyond regulatory compliance Commitment to transparency Commitment to stakeholder awareness and engagement Recognition of the overall importance of forests and other natural ecosystems Description of business dependency on forests Recognition of potential business impact on	We publicly recognize the impact deforestation has on climate change, reduced biodiversity, and water scarcity and have set public goals against prioritized commodities in our supply chain that we have determined have greater potential for deforestation risk. Specifically, we have public goals to source only recycled or certified virgin fiber for packaging by 2020 and to ensure that all our palm / palm kernel oil derivative ingredients are responsibly sourced by 2025, including criteria around traceability, deforestation, peatland preservation and high-carbon stock forest conservation, and business ethics and human rights, achieve 50% combined reduction in virgin plastic and fiber packaging by 2030, and achieve 100% recyclable, reusable or compostable packaging by 2025. We also monitor other key commodities for deforestation risk, including pulp and cellulose fiber in our wipes products, mill wood residuals and by-products, as well as wood char in our charcoal, and soy bean oil in our food products to determine if they are from certified sources or grown in regions with low deforestation risk. Our BPCOC includes preventing deforestation. In 2019, the Global Strategic Sourcing Team created the

		<p>forests and other natural habitats</p> <p>Description of forest risk commodities, parts of the business, and stages of value-chain covered by the policy</p> <p>List of timebound milestones and targets</p> <p>Description of forests-related performance standards for direct operations</p> <p>Description of forests-related standards for procurement</p>	<p>Timber Team, responsible for training Plant leaders on Timber commodity strategies and management at Kingsford. This team was created to align activities for all Clorox timber commodities (Fiber, Palm, Soy, and residual wood) achieving a more unified approach to better identify and align on activities that need to be implemented for the future. This new structure allows for joint engagement when applicable. For Palm, the team defined the 2025 Commitments/Policy for sustainable palm sourcing, including defining plan for 100% CSPO. We continue to report progress semi-annually and executed the 2019 Action Plan for palm oil, and annually to RSPO. For Charcoal (Hog Fuel), Clorox verified country of origin for Hog Fuel Forest commodities to ensure low deforestation risk in these supply chains. The results included implementing a new global processes to ensure all new Forest Commodity purchases meet commitments. Key tasks of the Timber Team include executing the annual packaging and wipes substrate fiber survey, updated results covering 100% of global supply and documenting all processes in our Corporate Social Responsibility Manual</p>
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F4.5b

(F4.5b) Do you have commodity specific sustainability policy(ies)? If yes, select the options that best describe their scope and content.

	Do you have a commodity specific sustainability policy?	Scope	Content	Please explain
Timber products	Yes	Company-wide	<p>Commitments beyond regulatory compliance</p> <p>Commitment to stakeholder awareness and engagement</p> <p>Recognition of the overall importance of forests and other natural ecosystems</p> <p>Description of business</p>	<p>We publicly recognize the impact deforestation has on climate change, reduced biodiversity, and water scarcity and have set public goals against prioritized commodities in our supply chain that we have determined have greater potential for deforestation risk. For timber, we have goals to source only recycled or certified virgin fiber for packaging by 2020 and achieve 50% combined reduction in virgin plastic and fiber packaging by 2030, We also monitor other key timber commodities for</p>

			<p>dependency on forests</p> <p>Description of forest risk commodities, parts of the business, and stages of value-chain covered by the policy</p> <p>List of timebound commitments and targets</p> <p>Description of forests-related performance standards for direct operations</p> <p>Description of forests-related standards for procurement</p>	<p>deforestation risk, including pulp and cellulose fiber in our wipes products, mill wood residuals and by-products, as well as wood char in our charcoal, to determine if they are from certified sources or grown in regions with low deforestation risk.</p> <p>In addition, the suppliers of wood used in our Kingsford charcoal business must comply with The Clorox Company's Business Partner Code of Conduct (or have an internal equivalent code) which states that they must comply with the Lacey Act, which outlines sourcing regulations related to timber products and forest conservation practices.</p>
Palm oil	Yes	Company-wide	<p>Commitment to eliminate deforestation</p> <p>Commitment to protect rights and livelihoods of local communities</p> <p>Commitments beyond regulatory compliance</p> <p>Commitment to transparency</p> <p>Commitment to stakeholder awareness and engagement</p> <p>Recognition of the overall importance of forests and other natural ecosystems</p> <p>Description of business dependency on forests</p>	<p>We publicly recognize the impact deforestation has on climate change, reduced biodiversity, and water scarcity and have set public goals against prioritized commodities in our supply chain that we have determined have greater potential for deforestation risk. For palm oil, we have a commitment that all palm/palm kernel oil ingredients are responsibly sourced. Our Palm commitments include:</p> <ul style="list-style-type: none"> - Source CSPO for palm oil and its derivatives through RSPO physical supply chains by 2025 and report on our progress through our RSPO Annual Communication of Progress (ACOP) and other public disclosures. - Ensure suppliers sourcing palm oil and palm kernel oil in our supply chain have public sustainable palm oil commitments aligned with the RSPO Principles and Criteria, including what is commonly referred to as NDPE (No Deforestation, No Peat and No

			<p>Description of forest risk commodities, parts of the business, and stages of value-chain covered by the policy</p> <p>List of timebound commitments and targets</p> <p>Description of forests-related performance standards for direct operations</p> <p>Description of forests-related standards for procurement</p>	<p>Exploitation).</p> <p>a. No deforestation and no development of high conservation value or high carbon stock areas</p> <p>b. No development on peat lands</p> <p>c. The protection of human rights including the respect for the rights of indigenous and local communities to give or withhold their free, prior and informed consent to operations on lands to which they hold legal, communal, or customary rights</p> <p>d. Public grievance process and response procedures for cases of non-compliance.</p> <ul style="list-style-type: none"> - Continue to hold suppliers accountable to the principles outlined in our Business Partner Code of Conduct, including compliance with all applicable laws and regulations in the countries of operation, and respect for human rights throughout the value chain. - Continue mapping, tracing and/or monitoring the supply chain of our palm ingredient suppliers and ensure adherence to Clorox and their own sourcing commitments and practices. - Continue engaging with our suppliers, industry peers, shareholders, non-governmental organizations and other stakeholders to promote sustainable palm oil supply chains, including collaborations to strengthen certification and verification mechanisms. - Report annually on our progress against these commitments. <p>These commitments apply to all palm oil ingredients we purchase globally. Our ability to achieve these commitments depends heavily on the changing practices of the palm industry and the future market</p>
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				availability of the palm derivatives used in our products.
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F4.6

(F4.6) Has your organization made a public commitment to reduce or remove deforestation and/or forest degradation from its direct operations and/or supply chain?

Yes

F4.6a

(F4.6a) Has your organization endorsed any of the following initiatives as part of its public commitment to reduce or remove deforestation and/or forest degradation?

Other, please specify

Earthworm Foundation, RSPO, AIM Progress, NASPON

F4.6b

(F4.6b) Provide details on your public commitment(s), including the description of specific criteria, coverage, and actions.

Forest risk commodity

Timber products

Criteria

Restricting the sourcing and/or trade of forest risk commodities to credible certified sources

Operational coverage

Direct operations and supply chain

% of total production/ consumption covered by commitment

100%

Cutoff date

Not applicable

Commitment target date

2020

Please explain

We have goals to source only recycled or certified virgin fiber for packaging by 2020 and achieve 50% combined reduction in virgin plastic and fiber packaging by 2030. In addition, the suppliers of wood used in our Kingsford charcoal business must comply with The Clorox Company's Business Partner Code of Conduct (or have an internal

equivalent code) which states that they must comply with the Lacey Act, which outlines sourcing regulations related to timber products and forest conservation practices.

Forest risk commodity

Palm oil

Criteria

- Zero gross deforestation/ no deforestation
- No land clearance by burning or clearcutting
- No conversion of High Conservation Value areas
- No conversion of High Carbon Stock forests
- No sourcing of illegally produced and/or traded forest risk commodities

Operational coverage

Direct operations and supply chain

% of total production/ consumption covered by commitment

100%

Cutoff date

Not applicable

Commitment target date

2020

Please explain

Our palm commitments include:

- Source CSPO for palm oil and its derivatives through RSPO physical supply chains by 2025.
- Ensure suppliers sourcing palm oil and palm kernel oil in our supply chain have public sustainable palm oil commitments aligned with the RSPO Principles and Criteria, including what is commonly referred to as NDPE (No Deforestation, No Peat and No Exploitation).
- Continue to hold suppliers accountable to the principles outlined in our BPCOC, including compliance with applicable laws and regulations in the countries of operation, and respect for human rights throughout the value chain.
- Continue mapping, tracing and/or monitoring the supply chain of our palm ingredient suppliers and ensure adherence to Clorox and their own sourcing commitments and practices.
- Continue engaging with our suppliers, industry peers, shareholders, non-governmental organizations and other stakeholders to promote sustainable palm oil supply chains, including collaborations to strengthen certification and verification mechanisms.
- Report annually on our progress against these commitments.

These commitments apply to all palm oil ingredients we purchase globally. Our ability to achieve these commitments depends heavily on the changing practices of the palm industry and the future market availability of the palm derivatives used in our products.

Clorox is a member of the Roundtable on Sustainable Palm Oil (RSPO) committed to continuing to support RSPO standards and certification as a means to drive Certified Sustainable Palm Oil (CSPO).

Clorox has supported Earthworm Foundation's Areas for Priority Transformation (APT), a program advancing long-term, landscape-level sustainability transformation in the Indonesian region of Aceh Tamiang, Sumatra since 2016.

In 2019, we joined the he APT Coalition Team providing input for the multi-year strategy impacting forests, workers, livelihoods, industry and partnerships with governments, society partners and private sector actors and donors.

In 2020, we joined a multi-stakeholder project, facilitated by Business for Social Responsibility, which focuses on ensuring safety and wellbeing of workers in palm growing and harvesting in Indonesia. We supported workshops to deepen understanding of labor issues and identified a set of palm oil producers in Indonesia committed to improve plantation management practices

F5. Business strategy

F5.1

(F5.1) Are forests-related issues integrated into any aspects of your long-term strategic business plan, and if so how?

	Are forests-related issues integrated?	Long-term time horizon (years)	Please explain
Long-term business objectives	Yes, forests-related issues are integrated	5-10	<p>Forest related issues are integrated into our long-term business objectives, our strategy, and our financial planning.</p> <p>Our current long-term corporate strategy, our 2020 strategy set in 2013, and our 2030 strategy, set in 2019, integrates corporate responsibility objectives with long term business objectives. These include our goal to have all fiber-based packaging we source (cartons, corrugates, displays and bags) to be made with either recycled or certified virgin fiber by 2020, as well as our goal to ensure our palm oil ingredients meet our responsible sourcing commitments by and achieve 50% combined reduction in virgin plastic and fiber packaging by 2030 and achieve 100% recyclable, reusable or compostable packaging by 2025.</p> <p>We integrate our Corporate Responsibility strategy and metrics with our long-term business strategy because we</p>

			believe our short and long-term success lies in our focus on driving good-growth, growth that is not just profitable and sustainable, but also achieved responsibly. We believe addressing deforestation and its impact on climate change is an important aspect of conducting business responsibly.
Strategy for long-term objectives	Yes, forests-related issues are integrated	5-10	<p>Forest related issues are integrated into our long-term business objectives, our strategy, and our financial planning.</p> <p>Our current long-term corporate strategy, our 2020 strategy set in 2013, and our 2030 strategy, set in 2019, integrates corporate responsibility objectives with our long term business objectives. These include our goal to have all fiber-based packaging we source (cartons, corrugates, displays and bags) to be made with either recycled or certified virgin fiber by 2020, as well as our goal to ensure our palm oil ingredients meet our responsible sourcing commitments by and achieve 50% combined reduction in virgin plastic and fiber packaging by 2030 and achieve 100% recyclable, reusable or compostable packaging by 2025.</p> <p>We integrate our Corporate Responsibility strategy and metrics with our long-term business strategy because we believe our short and long-term success lies in our focus on driving good-growth, growth that is not just profitable and sustainable, but also achieved responsibly. We believe addressing deforestation and its impact on climate change is an important aspect of conducting business responsibly.</p>
Financial planning	Yes, forests-related issues are integrated	5-10	<p>Forest related issues are integrated into our long-term business objectives, our strategy, and our financial planning.</p> <p>Our current long-term corporate strategy, our 2020 strategy set in 2013, and our 2030 strategy, set in 2019, integrates corporate responsibility objectives with business objectives. These include our goal to have all fiber-based packaging we source (cartons, corrugates, displays and bags) to be made with either recycled or certified virgin fiber by 2020, as well as our goal to ensure our palm oil ingredients meet our responsible sourcing commitments and achieve 50% combined reduction in virgin plastic and fiber packaging by 2030 and achieve 100% recyclable, reusable or compostable packaging by 2025.</p> <p>Resources required to deliver the Corporate</p>

			<p>Responsibility Strategy are considered as part of the long-term strategy process.</p> <p>We integrate our Corporate Responsibility strategy and metrics with our long-term business strategy because we believe our short and long-term success lies in our focus on driving good-growth, growth that is not just profitable and sustainable, but also achieved responsibly. We believe addressing deforestation and its impact on climate change is an important aspect of conducting business responsibly.</p>
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F6. Implementation

F6.1

(F6.1) Did you have any timebound and quantifiable targets for increasing sustainable production and/or consumption of your disclosed commodity(ies) that were active during the reporting year?

Yes

F6.1a

(F6.1a) Provide details of your timebound and quantifiable target(s) for increasing sustainable production and/or consumption of the disclosed commodity(ies), and progress made.

Target reference number

Target 1

Forest risk commodity

Timber products

Type of target

Third-party certification

Description of target

Restricting the sourcing and/or trade of forest risk commodities to credible certified sources

Linked commitment

Zero net/gross deforestation

Traceability point

Third-party certification scheme

FSC Forest Management certification
FSC Chain of Custody
PEFC Sustainable Forest Management certification
PEFC Chain of Custody
SFI Forest Management standard
SFI Chain of Custody

Start year

2012

Target year

2020

Quantitative metric

Target (number)

Target (%)

100

% of target achieved

99

Please explain

We have goals to source only recycled or certified virgin fiber for packaging by 2025. Currently, more than 99% of the fiber used in the packaging we purchase meets this criteria. This volume represents packaging used in approximately 95% of our global business (NCS \$). We plan to incorporate this requirement into our specifications and contracts in the future.

Target reference number

Target 2

Forest risk commodity

Palm oil

Type of target

Third-party certification

Description of target

Our intent is to source all of our palm oil sustainably. We seek to ensure that purchases of palm derived ingredients do not contribute to deforestation, peat clearance and human rights abuses. Actions include:

- Refine and implement our plan to source RSPO certified palm oil, palm kernel oil and their derivatives by 2025 for our Domestic volume; and by 2030 for Global volume.
- Continue to monitor supply and work closely with our suppliers to achieve this

commitment, including periodic field visits to mills and plantations.

- Report annually on progress against these commitments.
- Engage with our suppliers, industry peers, shareholders, non-governmental organizations and other stakeholders to promote sustainable palm oil supply chains and to strengthen certification and verification mechanisms.

Our ability to achieve this commitment depends heavily on the changing practices of the palm industry and the future market availability of the palm derivatives used in our products.

Linked commitment

Zero net/gross deforestation

Traceability point

Third-party certification scheme

RSPO Mass Balance

Start year

2015

Target year

2030

Quantitative metric

Target (number)

Target (%)

100

% of target achieved

32.6

Please explain

Our ambition is 100% RSPO by 2025 which is an aggressive goal given that more than 99% of our palm footprint is related to derivatives of palm oil and palm kernel oil. It is our experience that commercial availability of these ingredients does not meet global demand, and the assortment of palm derivatives are not all available from RSPO-certified manufacturers or producers. We are further limited in the use of RSPO-certified sustainable palm derivatives because our Palm Oil Responsible Sourcing Commitment includes many provisions and requirements beyond those set forth in RSPO Principles and Criteria. We established our Palm Oil Responsible Sourcing Commitment in 2015 and believe our responsibility is to source palm-derived ingredients in a manner that doesn't contribute to deforestation, protects peatlands and respects human rights in our sourcing communities. In 2017, we completed the first phase of engagement with our top palm ingredient suppliers, as outlined in our Clorox Road Map published in March

2016. This action plan outlined three key steps and milestones through 2017 in the implementation of our Palm Oil Responsible Sourcing Commitment: 1) Evaluate and track supplier progress toward achieving compliance with our commitment. 2) Trace our palm footprint to various milestones in the supply chain, including to the mill level and subsequently to fresh fruit bunch (FFB) origin. 3) Identify key points in our supply chain where we can influence change and support transformation activities on the ground. We made progress against goals and raised awareness of the larger industry challenges involved with sourcing of palm oil derivatives. By the close of 2017, Clorox collected traceability information from these key suppliers, achieving 89 percent traceability to the mill, with the ultimate aim of promoting increased transparency throughout the industry and moving it toward impactful change on the ground. As a result, we identified specific palm oil production areas within our supply chain and acted on this new information by investing in a landscape-level transformation projects. For CY2019, we have 32.6% RSPO certified palm derivative ingredients and continued to increase our level of commitment through our actions as we move towards our goal of 100% certification.

Target reference number

Target 3

Forest risk commodity

Palm oil

Type of target

Traceability

Description of target

Enable 3rd party verification of our suppliers supply chain traceability efforts In 2019, expanded our palm traceability globally reviewing 399 more tons of palm in our supply chain with plans in 2020 to educate all palm suppliers on our commitment and engage directly with all palm suppliers providing over 50 metric tons. We are planning to train our palm supplier is on our palm commitment and we will assist priority suppliers with the development palm policies on an as needed basis.

Linked commitment

Zero net/gross deforestation

Traceability point

Mill

Third-party certification scheme

Start year

2015

Target year

2025

Quantitative metric**Target (number)****Target (%)**

100

% of target achieved

89

Please explain

The company's sourcing of palm oil ingredients is limited to 99% derivatives of palm and palm kernel oil. It is our experience that commercial availability of such oleo-chemical ingredients does not meet global demand, and the assortment of palm derivatives are not all available from RSPO-certified manufacturers or producers. Beyond commercial availability, we are further limited in the use of RSPO-certified sustainable palm derivatives because The Clorox Company Palm Oil Responsible Sourcing Commitment includes many provisions and requirements beyond those set forth in RSPO Principles and Criteria. While we support RSPO Principles and Criteria, we established our Palm Oil Responsible Sourcing Commitment in 2015 which was refreshed in 2020. Through extensive multi-stakeholder engagement and action in responsibly sourcing of our palm-derived ingredients in a manner that doesn't contribute to deforestation, Clorox continues to support protection of peatlands and respect of human rights in our sourcing communities. Annually, we published and executed our Clorox Palm Oil Responsible Sourcing Action Plan. Our time-bound action plan outlines key milestones for achieving our 2025 goals and the implementation of our Palm Oil Responsible Sourcing Commitment. Through outreach with our global suppliers — we have made progress against goals and raised awareness of the larger industry challenges involved with sourcing of palm oil derivatives.

In 2019, Clorox collected traceability information from priority suppliers, achieving 89 percent traceability to the mill and 99 percent traceability to the origin refiner with the ultimate aim of promoting increased transparency throughout the industry and moving it toward impactful change on the ground. As a result of our tracing work, we identified specific palm oil production areas within our supply chain and have acted on this information by investing in landscape-level transformation projects since 2017. In 2019, Clorox joined the APT Steering Committee joining other NGO's, CPG's and other multi-stakeholders providing leadership and direction for positive change in Areas of Priority Transformation (APT) in Indonesia.

Target reference number

Target 4

Forest risk commodity

Timber products

Type of target

Other, please specify
100% certified virgin or recycled in pkg

Description of target

100% certified virgin or recycled in packaging

Linked commitment

Zero net/gross deforestation

Traceability point

Third-party certification scheme

Start year

2012

Target year

2020

Quantitative metric

Percentage

Target (number)

Target (%)

100

% of target achieved

99

Please explain

We have goals to source only recycled or certified virgin fiber for packaging by 2020. Currently, more than 99% of the fiber used in the packaging we purchase meets this criteria. This volume represents packaging used in approximately 95% of our global business (NCS \$).

Target reference number

Target 5

Forest risk commodity

Timber products

Type of target

Other, please specify
Product Level

Description of target

Our commitment starts with reducing the amount of fiber we use by increasing the percentage of paper from recycled. We have a goal to achieve a 50% combined reduction in virgin plastic and fiber packaging by 2030.

Linked commitment

Other environmental commitments

Traceability point

Third-party certification scheme

Start year

2018

Target year

2030

Quantitative metric

Percentage

Target (number)

Target (%)

50

% of target achieved

0

Please explain

In 2019, Clorox announced an ambitious set of environmental, social and governance (ESG) leadership goals integrated with our strategic business choices, as part of its long-term corporate strategy called Ignite. These ESG goals include a 50% combined reduction in virgin plastic and fiber packaging by 2030.

The coverage target includes all plastic and cardboard packaging that we purchase for our operationally controlled manufacturing facilities. The net volume (on a mass basis) of plastic and fiber packaging is based on the volumes and virgin content purchased. Our 50% reduction target is an intensity target measured per case of product sold versus 2018, our baseline year for this goal. While we have measured a preliminary 2018 baseline, we are working to improve our systems and expect refinements to our preliminary baseline. Once we have material results to report against this new metric, we will share our baseline and most recent results versus this target.

Target reference number

Target 6

Forest risk commodity

Timber products

Type of target

Other, please specify

Reduced consumption of virgin materials

Description of target

100% recyclable, reusable or compostable packaging by 2025

Linked commitment

Other environmental commitments

Traceability point

Third-party certification scheme

Start year

2018

Target year

2025

Quantitative metric

Percentage

Target (number)

Target (%)

100

% of target achieved

79

Please explain

Climate related risks and opportunities are at the forefront of our decision making processes to ensure that Clorox remains a leader in corporate responsibility while maintaining Good Growth. In 2019, Clorox announced an ambitious set of environmental, social and governance (ESG) leadership goals integrated with our strategic business choices, as part of its long-term corporate strategy called Ignite. These ESG goals include 100% recyclable, reusable, or compostable packaging by 2025.

The coverage target includes all primary packaging for our products sold globally. Data has been calculated using the Ellen MacArthur Foundation's recyclability assessment tool, which is based on the findings of their New Plastics Economy 2020 Recycling

Survey and the Ellen MacArthur Foundation's definition of recyclable packaging. Percent of target achieved is calculated based on CY18 US sales data and is estimated to reflect global results for this metric. We believe CY18 sales data is representative of CY19 given there were no material changes in the company's product mix during this time period.

F6.2

(F6.2) Do you have traceability system(s) in place to track and monitor the origin of your disclosed commodity(ies)?

	Do you have system(s) in place?	Description of traceability system	Exclusions	Description of exclusion
Timber products	Yes	We regularly engage with our suppliers of mill wood residuals and by-products used to make our charcoal as well as wood char for one charcoal product line and understand all sourcing regions to be in the U.S.	Not applicable	
Palm oil	Yes	We trace our palm derivative ingredients back to the First Refiner and mill in support of our 2025 target.	Not applicable	

F6.2a

(F6.2a) Provide details on the level of traceability your organization has for its disclosed commodity(ies).

Forest risk commodity	Point to which commodity is traceable	% of total production/consumption volume traceable
Timber products	Country	99
Palm oil	Refinery	88
Palm oil	Mill	79

F6.3

(F6.3) Have you adopted any third-party certification scheme(s) for your disclosed commodity(ies)? Indicate the volume and percentage of your certified production and/or consumption.

Forest risk commodity

Timber products

Third-party certification scheme

FSC Chain of Custody

Certification coverage

Consumption volume

% of total production/consumption volume certified

8

Form of commodity

Primary packaging

Secondary packaging

Tertiary packaging

Volume of production/ consumption certified

11,295

Metric

Metric tons

Please explain

More than 99% of the fiber used in our packaging is from supplier's certified virgin or recycled sources. Across our approximately 138,000 metric tons fiber used in packaging materials we purchase, approximately 44% is SFI certified material, 8% is FSC certified material, 3% is PEFC certified material, and 1% is virgin material that is not certified. The remaining 45% is recycled fiber.

This volume represents packaging used in approximately 95% of our global business (NCS \$). We are continuing to make progress towards reaching our goal of 100% recycled or certified virgin fiber in our packaging by 2020. In addition, the suppliers of our timber based products must comply with The Clorox Company's Business Partner Code of Conduct (or have an internal equivalent code) which states that they must comply with the Lacey Act, which outlines sourcing regulations related to timber products and forest conservation practices.

Forest risk commodity

Timber products

Third-party certification scheme

FSC Chain of Custody

Certification coverage

Consumption volume

% of total production/consumption volume certified

Form of commodity

Cellulose-based textile fiber

Other, please specify

paper-based pulp

Volume of production/ consumption certified

Metric

Metric tons

Please explain

Clorox uses wood-based fiber in some of our products — namely Clorox® disinfecting wipes, Green Works® compostable cleaning wipes, Burt’s Bees® towelettes and Burt’s Bees® baby wipes. We do not purchase this fiber directly so we do not maintain the chain of custody for the certification for tree-based materials used in our wipes.

However, we contacted our suppliers and approximately 97% or 14,865 metric tons of the tree-based material in our wipes is from FSC certified sources.

Forest risk commodity

Timber products

Third-party certification scheme

SFI Chain of Custody

Certification coverage

Consumption volume

% of total production/consumption volume certified

44

Form of commodity

- Primary packaging
- Secondary packaging
- Tertiary packaging

Volume of production/ consumption certified

60,242

Metric

Metric tons

Please explain

More than 99% of the fiber used in our packaging is from supplier’s certified virgin or recycled sources. Across our approximately 138,000 metric tons fiber used in packaging materials we purchase, approximately 44% is SFI certified material, 8% is FSC certified material, 3% is PEFC certified material, and 1% is virgin material that is not certified. The remaining 45% is recycled fiber.

This volume represents packaging used in approximately 95% of our global business (NCS \$). We are continuing to make progress towards reaching our goal of 100% recycled or certified virgin fiber in our packaging by 2020. In addition, the suppliers of

our timber based products must comply with The Clorox Company's Business Partner Code of Conduct (or have an internal equivalent code) which states that they must comply with the Lacey Act, which outlines sourcing regulations related to timber products and forest conservation practices

Forest risk commodity

Timber products

Third-party certification scheme

PEFC Project Chain of Custody

Certification coverage

Consumption volume

% of total production/consumption volume certified

3

Form of commodity

- Primary packaging
- Secondary packaging
- Tertiary packaging

Volume of production/ consumption certified

3,765

Metric

Metric tons

Please explain

More than 99% of the fiber used in our packaging is from supplier's certified virgin or recycled sources. Across our approximately 138,000 metric tons fiber used in packaging materials we purchase, approximately 44% is SFI certified material, 8% is FSC certified material, 3% is PEFC certified material, and 1% is virgin material that is not certified. The remaining 45% is recycled fiber.

This volume represents packaging used in approximately 95% of our global business (NCS \$). We are continuing to make progress towards reaching our goal of 100% recycled or certified virgin fiber in our packaging by 2020. In addition, the suppliers of our timber based products must comply with The Clorox Company's Business Partner Code of Conduct (or have an internal equivalent code) which states that they must comply with the Lacey Act, which outlines sourcing regulations related to timber products and forest conservation practices.

Forest risk commodity

Palm oil

Third-party certification scheme

RSPO Mass Balance

Certification coverage

Consumption volume

% of total production/consumption volume certified

32.6

Form of commodity

Palm oil derivatives

Palm kernel oil derivatives

Volume of production/ consumption certified

697

Metric

Metric tons

Please explain

Clorox's sourcing of palm oil ingredients is limited to 99% derivatives of palm and palm kernel oil. Typically present in very small percentages as sub-components of surfactants, fatty alcohols, emulsifiers or fragrances, palm oil derivatives are used in some of our cleaning, food, and natural personal care products. While Clorox's total palm oil ingredient volume represents less than 0.003 percent of palm oil produced globally each year we are committed to working with our suppliers, other companies and the civic sector to address environmental and social issues in the sector. As part of that effort, Clorox has been an RSPO member since 2016 and supported 2018 updates to the P&Cs, including strengthening commitments to: incorporate the High Carbon Stock Approach (HCSA) to further address deforestation, requirement for no new planting of palm oil on peatlands regardless of depth, and significant improvements to the RSPO P&C with respect to labor rights and practices. Clorox is now working plans to move to RSPO certified palm material by 2025. We expect to implement a mandatory request for new materials and suppliers to provide RSPO Mass Balance certified materials, and review contracts and supply agreement to start negotiating the certified volumes for all existing materials to meet our certification objectives. Since Clorox only sources palm derivatives, we recognize our ability to achieve this commitment depends heavily on the changing practices of the palm industry and the future market availability of the palm derivatives used in our products. In addition to certification, we continue partnering with Earthworm Foundation and current suppliers of palm oil ingredients on plans to trace our ingredient supply chain, and help to ensure that palm derivative ingredients we source meet our comprehensive responsible sourcing commitments.

Currently about 32.6% of our 2137 metric tons of palm oil derivatives and palm kernel oil derivative volumes are RSPO certified.

F6.4

(F6.4) For your disclosed commodity(ies), do you have a system to control, monitor, or verify compliance with no conversion and/or no deforestation commitments?

A system to control, monitor or verify compliance	
Timber products	Yes, we have a system in place for our no conversion and/or deforestation commitments
Palm oil	Yes, we have a system in place for our no conversion and/or deforestation commitments

F6.4a

(F6.4a) Provide details on the system, the approaches used to monitor compliance, the quantitative progress, and the non-compliance protocols, to implement your no conversion and/or deforestation commitment(s).

Forest risk commodity

Timber products

Operational coverage

Supply chain

Description of control systems

A few tools are used to monitor compliance quantitatively to implement Clorox's no deforestation commitment. Education in 2019 for our supply chain and the specific team members involved a Timber Engagement in person and on-line training deck on education our buyers supporting our supply chain was developed. In addition, Our Responsible Sourcing & Sustainability Manager traveled to various Kingsford facilities to educate with plant leadership, and buyers on our commitment to no deforestation regarding timber commodities. In 2019 the Timber Team was created in Global Strategic Sourcing to support and align on activities. This new structure allows for joint engagement when applicable with these commodities.

Monitoring and verification approach

Other, please specify
In-House Timber Team

% of total volume in compliance

% of total suppliers in compliance

Response to supplier non-compliance

Retain & engage

Procedures to address and resolve non-compliance with suppliers

Please explain

Adherence to the Clorox Supplier Business Partner Code of Conduct (Code) is required for all suppliers and our Code also supports our environmental, social and governance (ESG) commitments related to human rights and labor, respectful treatment and equal opportunity, anti-corruption, and environmental sustainability. Effectively implementing sustainability is a long-held principle of Clorox, and our Code is grounded in international standards and best practices, including the International Labor Organization (ILO) Declaration on Fundamental Principles and Rights at Work and the Ten Principles of the United Nations Global Compact.

When information of any non-compliance in our supply chain occurs, Clorox reviews the details and our supply chain to understand if the non-compliance touch any part. When needed Clorox notifies our suppliers to request action if the non-compliance is within their supply chain.

Forest risk commodity

Palm oil

Operational coverage

Supply chain

Description of control systems

Our Global Strategic Sourcing Center of Excellence Team performs an Annual Risk Assessment of direct suppliers to review their overall risk rating reviewing all supplier location sites, spend and audit history. All direct suppliers are requested to perform a SMETA 4 Pillar Social Compliance audit which includes a thorough review of the companies' environmental practices and business ethics along with labor and health & safety. In 2019, we reviewed plans to include not only 3rd party audits performed by audit firms, but in 2020 Clorox will include 2nd party audits performed by Clorox employees. In 2019, Clorox began utilizing the Sedex (Supplier Ethical Data Exchange) platform including a new risk tool, Radar. The Sedex Radar Tool includes a risk flag for deforestation and a biodiversity risk score.

In 2019, ground monitoring was managed by our partner, Earthworm Foundation, in Indonesia supporting most of the forests in which our suppliers purchase palm oil used in our ingredients.

Monitoring and verification approach

Ground-based monitoring system

Community-based monitoring

Third-party verification

% of total volume in compliance

% of total suppliers in compliance

Response to supplier non-compliance

Retain & engage

Procedures to address and resolve non-compliance with suppliers

Developing time-bound targets and milestones to bring suppliers back into compliance

Please explain

Adherence to the Clorox Supplier Business Partner Code of Conduct (Code) is required for all suppliers and our Code also supports our environmental, social and governance (ESG) commitments related to human rights and labor, respectful treatment and equal opportunity, anti-corruption, and environmental sustainability. Effectively implementing sustainability is a long-held principle of Clorox, and our Code is grounded in international standards and best practices, including the International Labor Organization (ILO) Declaration on Fundamental Principles and Rights at Work and the Ten Principles of the United Nations Global Compact.

When information of any non-compliances in our supply chain occurs, Clorox reviews the details and our supply chain mapping risk analysis tools to understand if the non-compliance touch any part of our supply chain. When needed Clorox notifies our suppliers to request action if the non-compliance is within their supply chain.

F6.6

(F6.6) For your disclosed commodity(ies), indicate if you assess your own compliance and/or the compliance of your suppliers with forest regulations and/or mandatory standards.

	Assess legal compliance with forest regulations	Please explain
Timber products	No, we do not assess legal compliance	We review all suppliers annually to asses risk for third-party auditing. We implemented into our annual review the use of the new Sedex Radar Tool. In addition, the Sedex Radar Risk Tool is used to prescreen potential suppliers for risk and review biodiversity impact at supplier locations. The biodiversity impact will be reviewed annually starting in 2020 for all high risk global suppliers in our supply chain to determine if an audit is required each year and understand potential risks and action plans.
Palm oil	No, we do not assess legal compliance	We review all suppliers annually to asses risk for third-party auditing. We implemented into our annual review the use of the new Sedex Radar Tool. In addition, the Sedex Radar Risk Tool is used to prescreen potential suppliers for risk and review biodiversity impact at supplier locations. The biodiversity impact will be reviewed annually starting in 2020 for all high risk global suppliers in our supply chain to determine if an audit is required each year and understand potential risks and action plans.

F6.7

(F6.7) Are you working with smallholders to support good agricultural practices and reduce deforestation and/or conversion of natural ecosystems?

	Are you working with smallholders?	Type of smallholder engagement approach	Smallholder engagement approach	Number of smallholders engaged	Please explain
Timber products	Not applicable				
Palm oil	Yes, working with smallholders	Other	Other, please specify RSPO Membership		As a member of RSPO, we indirectly support independent smallholders, defined as palm oil smallholders not bound by any contract, credit agreement or planning to a particular palm oil mill. This support covers fair and transparent dealings with Smallholders and improved Smallholder livelihoods. We supported a series of workshops for the smallholders in Indonesia through the Business for Social Responsibility.

F6.8

(F6.8) Are you working with your direct suppliers to support and improve their capacity to comply with your forests-related policies, commitments, and other requirements?

	Are you working with direct suppliers?	Type of direct supplier engagement approach	Direct supplier engagement approach	% of suppliers engaged	Please explain
Timber products	Yes, working with direct suppliers	Supply chain mapping Other	Supplier questionnaires on environmental	Don't know	We don't currently track the percentage of Timber suppliers that we engage. Activities include collecting data in central database

			and social indicators Supplier audits		Encouraging certification Encouraging work with multi-stakeholder groups Supplier questionnaires on environmental and social indicators.
Palm oil	Yes, working with direct suppliers	Supply chain mapping	Supplier questionnaires on environmental and social indicators Supplier audits	81-90%	A comprehensive risk assessment was performed in 2019, identifying High Impact Suppliers, and will be utilized to engage with high priority suppliers to bring visibility of their supply chains and support landscape level initiatives. These suppliers are estimated to represent 89 percent of our domestic business palm oil derivative purchases. Activities include: <ul style="list-style-type: none"> - Collecting data in central database -Encouraging certification -Encouraging work with multi-stakeholder groups- Supplier questionnaires on environmental and social indicators- Supplier audits- Meet annually with priority suppliers of palm and are sharing risk data with suppliers as we obtain risk profiles for the various regions of their supply chain -Communicate annually with all palm suppliers our commitments and other requirements for certification options.

F6.9

(F6.9) Are you working beyond your first-tier supplier(s) to manage and mitigate deforestation risks?

	Are you working beyond first tier?	Type of engagement approach with indirect suppliers	Indirect supplier engagement approach	Please explain
Timber products	No, not working beyond the first tier			We publicly recognize the impact deforestation has on climate change, reduced biodiversity, and water scarcity and have set public goals against prioritized commodities in our supply chain that we have determined have greater potential for deforestation risk. For timber, we have goals to source only recycled or certified virgin fiber for packaging by 2020 And achieve 50% combined reduction in virgin plastic and fiber packaging by 2030, We also monitor other key timber commodities for deforestation risk, including pulp and cellulose fiber in our wipes products, mill wood residuals and by-products, as well as wood char in our charcoal, to determine if they are from certified sources or grown in regions with low deforestation risk.
Palm oil	Yes, working beyond first tier	Supply chain mapping	Supplier audits	Our approach to meeting our responsible palm oil commitments is rooted in supplier engagement designed to educate our suppliers of derivative ingredients about the issues in palm oil supply chains, encourage and assist as necessary in strengthening their own policies, help in tracing their supply chains back to the mill and subsequently to the plantation, and identifying key points in the supply chain where we can help influence change and support transformation on the ground.

F6.10

(F6.10) Do you participate in external activities and/or initiatives to promote the implementation of your forests-related policies and commitments?

Forest risk commodity

Timber products

Do you participate in activities/initiatives?

Yes

Activities

Involved in multi-partnership or stakeholder initiatives

Initiatives

UN Global Compact

Forest Stewardship Council (FSC)

Programme for the Endorsement of Forest Certification (PEFC)

Sustainable Forestry Initiative (SFI)

Other, please specify

The Consumer Good Forum (CGF)

Jurisdictional approaches

Please explain

In addition to requiring certifications for virgin packaging fiber, thereby increasing demand for more sustainable forest risk commodities, we are members of the Sustainable Packaging Coalition and Consumer Goods Forum, signatories to UN Global Compact, and have invested in partnerships through Earthworm/The Forest Trust and AIM-Progress to engage our suppliers and collaborate within industry.

Forest risk commodity

Palm oil

Do you participate in activities/initiatives?

Yes

Activities

Involved in multi-partnership or stakeholder initiatives

Initiatives

UN Global Compact

Roundtable on Sustainable Palm Oil (RSPO)

Other, please specify

The Consumer Good Forum (CGF), NASPON, RSPO, Earthworm Foundation, APT (Areas of Priority Transformation) Steering Committee

Jurisdictional approaches

Please explain

In addition requiring responsibly sourced palm oil, we are also engaging with our suppliers to raise awareness of issues in supply chains, particularly in derivative palm ingredient supply chains. We have invested in partnerships through The Natural Resources Stewardship Circle, Earthworm Foundation, and AIM-Progress to engage

our suppliers and collaborate within industry. In 2019, Clorox was part of the Derivatives Working Group at NASPON (North American Sustainable Palm Oil Network) developing best practices for CPG's purchasing palm oil including a derivatives list with detailed ingredients that contain palm oil, palm kernel oil, or palm derivatives. In addition, NASPON developed a Segregated Map along with FAQs for brands purchasing palm oil in their supply chain. One other outcome of this team was the creating the Education and Outreach Working Group which developed a vendor survey/evaluation to collect palm oil data for the ACOP (Annual Communication of Palm).

In 2019 Clorox joined the APT Steering Committee to have direct input on direction of the implementation of the APT Programme and targeting interventions supporting the APT Coalition, Norad, and other private sector supporters. This team through Earthworm Foundation in Indonesia mobilizes its resources and that of the local partners to support the decoupling of deforestation from supply chains in Aceh Tamiang, the strengthening of NDPE policies and practices by commercial actors, and improvement of livelihood prospects by communities in two Leuser-connected APT landscapers. Key activities and KPIs are tracked and reported quarterly including government and multi-stakeholder capacity-building and coordination, eliminating deforestation inside palm oil concessions, reducing deforestation by palm oil smallholders, strengthening NDPE practices of plantations and mills, and robust data & monitoring to support interventions and communications.

F6.11

(F6.11) Is your organization supporting or implementing project(s) focused on ecosystem restoration and protection?

No

F7. Verification

F7.1

(F7.1) Do you verify any forests information reported in your CDP disclosure?

No, we do not verify any forests-related information reported in our CDP disclosure, and there are no plans to do so

F8. Barriers and challenges

F8.1

(F8.1) Describe the key barriers or challenges to eliminating deforestation and/or conversion of other natural ecosystems from your direct operations or from other parts of your value chain.

Forest risk commodity

Palm oil

Coverage

Supply chain

Primary barrier/challenge type

Limited availability of certified materials

Comment

The company's sourcing of palm oil ingredients is limited to derivatives of palm and palm kernel oil. It is our experience that commercial availability and assortment of palm derivatives is not all available from RSPO-certified manufacturers or producers. The supply chains for palm derivative ingredients are multi-tiered and far more challenging versus those for palm oil. As traceability is the first step to better understanding risk and determining key leverage points in the supply chain where we can influence change and support transformation activities on the ground, our timeline is subject to change based on more learning and the progress of our suppliers.

We have updated our Palm commitment, in part, to address these challenges:

- Source CSPO for palm oil and its derivatives through RSPO physical supply chains by 2025.
- Ensure suppliers sourcing palm oil and palm kernel oil in our supply chain have public sustainable palm oil commitments aligned with the RSPO Principles and Criteria, including what is commonly referred to as NDPE (No Deforestation, No Peat and No Exploitation).
- Continue to hold suppliers accountable to the principles outlined in our Business Partner Code of Conduct, including compliance with all applicable laws and regulations in the countries of operation, and respect for human rights throughout the value chain.
- Continue mapping, tracing and/or monitoring the supply chain of our palm ingredient suppliers and ensure adherence to Clorox and their own sourcing commitments and practices.
- Continue engaging with our suppliers, industry peers, shareholders, non-governmental organizations and other stakeholders to promote sustainable palm oil supply chains, including collaborations to strengthen certification and verification mechanisms.
- Report annually on our progress against these commitments

These commitments apply to all palm oil ingredients we purchase globally. Our ability to achieve these commitments depends heavily on the changing practices of the palm industry and the future market availability of the palm derivatives used in our products.

Forest risk commodity

Palm oil

Coverage

Supply chain

Primary barrier/challenge type

Supply chain complexity

Comment

We currently have a goal to ensure that all our palm / palm kernel oil ingredients are responsibly sourced. We are partnering with Earthworm Foundation and our current suppliers of palm oil ingredients on a plan to help ensure that the ingredients used in our products meet our comprehensive responsible sourcing commitments, including criteria around traceability, deforestation, peatland preservation and high-carbon stock forest conservation, and business ethics and human rights. The company's sourcing of palm oil ingredients is limited to derivatives of palm and palm kernel oil. It is our experience that commercial availability of such oleo-chemical ingredients does not meet global demand, and the assortment of palm derivatives is not all available from RSPO-certified manufacturers or producers. The supply chains for palm derivative ingredients are multi-tiered and far more challenging versus those for palm oil. In our work so far we have learned they are often more complex than we anticipated when establishing our targets. As traceability is the first step to better understanding risk and determining key leverage points in the supply chain where we can influence change and support transformation activities on the ground, our timeline is subject to change based on more learning and the progress of our suppliers

F8.2

(F8.2) Describe the main measures that would improve your organization's ability to manage its exposure to deforestation and/or conversion of other natural ecosystems.

Forest risk commodity

Palm oil

Coverage

Supply chain

Main measure

Investment in monitoring tools and traceability systems

Comment

Industry development of comprehensive and cost-effective monitoring tools and traceability systems would greatly reduce the cost, complexity, and redundancy of work involved in assessing risk and monitoring compliance with palm oil sourcing requirements, enabling more resources to be deployed towards transforming and ultimately achieving the vision of a sustainable palm oil industry.

F17 Signoff

F-FI

(F-FI) Use this field to provide any additional information or context that you feel is relevant to your organization's response. Please note that this field is optional and is not scored.

F17.1

(F17.1) Provide the following information for the person that has signed off (approved) your CDP forests response.

	Job Title	Corresponding job category
Row 1	Environmental & Sustainability Manager	Environment/Sustainability manager

SF. Supply chain module

SF0.1

(SF0.1) What is your organization's annual revenue for the reporting period?

	Annual revenue
Row 1	6,214,000,000

SF0.2

(SF0.2) Do you have an ISIN for your organization that you are willing to share with CDP?

No

SF1.1

(SF1.1) In F6.3 you were asked "Have you adopted any third-party certification scheme(s) for your disclosed commodity(ies)? Indicate the volume and percentage of your certified production and/or consumption". Can you also indicate, for each of your disclosed commodity(ies), the percentage of certified volume sold to each requesting CDP supply chain member?

Yes

SF1.1a

(SF1.1a) For each of your requesting CDP supply chain members, indicate the percentage of certified volume sold per disclosed commodity(ies).

Requesting member

Walmart, Inc.

Forest risk commodity

Timber products

Form of commodity

Primary packaging

Secondary packaging

Tertiary packaging

Third-party certification scheme

FSC Chain of Custody

Total volume of commodity sold to member

29,601

Metric

Metric tons

What % of the volume reported in column 5 is certified?

<10%

Comment

Our total packaging fiber volumes sold to Walmart USA/Sam's Club USA is approximately 29,601 metric tons. Of that volume, approximately 54% is certified virgin fiber with the remaining 45% of the volume being recycled fiber. Of our certified packaging fiber volume reported, approximately 80% is SFI certified, 15% FSC certified and 5% PEFC certified (multiply by 0.54 to calculate the total certified with the remaining being recycled content). The volume of the commodity sold to Walmart USA (including Sam's Club USA) has been computed based on percent of sales to customer.

Requesting member

Walmart, Inc.

Forest risk commodity

Timber products

Form of commodity

Cellulose-based textile fiber

Other, please specify

Paper-based pulp

Third-party certification scheme

Total volume of commodity sold to member

3,264

Metric

Metric tons

What % of the volume reported in column 5 is certified?

Comment

Clorox uses wood-based fiber in some of our products — namely Clorox® disinfecting wipes, Green Works® compostable cleaning wipes, Burt's Bees® towelettes and Burt's Bees® baby wipes. We do not purchase this fiber directly so we do not maintain the chain of custody for the certification for tree-based fiber used in our wipes. However, we have contacted our suppliers and approximately 97% or 3,166 metric tons of tree-based material in our sold to Walmart wipes is from FSC certified sources.

Requesting member

Walmart, Inc.

Forest risk commodity

Timber products

Form of commodity

- Primary packaging
- Secondary packaging
- Tertiary packaging

Third-party certification scheme

SFI Chain of Custody

Total volume of commodity sold to member

12,892

Metric

Metric tons

What % of the volume reported in column 5 is certified?

41-50%

Comment

Our total packaging fiber volumes sold to Walmart USA/Sam's Club USA is approximately 29,601 metric tons. Of that volume, approximately 54% is certified virgin fiber with the remaining 45% of the volume being recycled fiber. Of our certified packaging fiber volume reported, approximately 80% is SFI certified, 15% FSC certified and 5% PEFC certified (multiply by 0.54 to calculate the total certified with the remaining being recycled content). The volume of the commodity sold to Walmart USA (including Sam's Club USA) has been computed based on percent of sales to customer.

Requesting member

Walmart, Inc.

Forest risk commodity

Timber products

Form of commodity

Primary packaging

Secondary packaging

Tertiary packaging

Third-party certification scheme

PEFC Chain of Custody

Total volume of commodity sold to member

29,601

Metric

Metric tons

What % of the volume reported in column 5 is certified?

<10%

Comment

Our total packaging fiber volumes sold to Walmart USA/Sam's Club USA is approximately 29,601 metric tons. Of that volume, approximately 54% is certified virgin fiber with the remaining 45% of the volume being recycled fiber. Of our certified packaging fiber volume reported, approximately 80% is SFI certified, 15% FSC certified and 5% PEFC certified (multiply by 0.54 to calculate the total certified with the remaining being recycled content). The volume of the commodity sold to Walmart USA (including Sam's Club USA) has been computed based on percent of sales to customer.

Requesting member

Walmart, Inc.

Forest risk commodity

Palm oil

Form of commodity

Palm oil derivatives

Palm kernel oil derivatives

Third-party certification scheme

RSPO Mass Balance

Total volume of commodity sold to member

457.3

Metric

Metric tons

What % of the volume reported in column 5 is certified?

31-40%

Comment

Clorox's sourcing of palm oil ingredients is limited to 99% derivatives of palm and palm kernel oil. Typically present in very small percentages as sub-components of surfactants, fatty alcohols, emulsifiers or fragrances, palm oil derivatives are used in some of our cleaning, food, and natural personal care products. Currently over 32% of palm oil derivatives and palm kernel oil derivative volumes are RSPO certified. The volume of the commodity sold to Walmart USA (including Sam's Club USA) has been computed based on percent of sales to customer.

SF2.1

(SF2.1) Please propose any mutually beneficial forests-related projects you could collaborate on with specific CDP supply chain members.

SF2.2

(SF2.2) Have requests or initiatives by CDP supply chain members prompted your organization to take organizational-level action to reduce or remove deforestation/forest degradation from your operations or your supply chain?

No

SF3.1

(SF3.1) For your disclosed commodity(ies), do you estimate the GHG emission reductions and/or removals from land use and land use change that have occurred in your direct operations and/or supply chain?

Timber products

Estimate GHG emissions and removals from land use and land use change

No

Please explain

Palm oil

Estimate GHG emissions and removals from land use and land use change

No

Please explain