

# Welcome to your CDP Climate Change Questionnaire 2021

## C0. Introduction

### C0.1

#### **(C0.1) Give a general description 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.

Our commitment to environmental sustainability shows up in all parts of our business every day. Since 2008, we've made it a top priority to go beyond environmental compliance and begin a long-term journey to reduce the footprint of our operations, improve the sustainability of our products and packaging, and enhance the transparency and sustainability progress in our upstream supply chain, which involves ingredients and materials that go into our products and packaging.

In 2019, as part of our IGNITE strategy, we unveiled an ambitious set of new environmental goals to advance our progress in this area. These goals, known as our IGNITE Environmental, Social, and Governance (ESG) planet goals, build on our previous 2020 strategy and call for us



to demonstrate leadership in plastic and other waste reduction and science-based climate action, as we continue to uphold our commitments to water stewardship, responsible sourcing and other material reduction innovations to reduce material, water, and transportation footprints of our products during consumer use and at the end of life.

As part of Clorox’s IGNITE strategy ESG goals, we have committed to science-based climate action across our value-chain, 100% renewable electricity in our US and Canada operations, and zero-waste-to-landfill in our global facilities. As we pursue these goals, we will continue to drive efficiency improvements that minimize our use of energy and water and generation of waste in our global operations. This builds on progress made during Clorox’s 2020 strategy period to drive more than 20% reductions in greenhouse gas (GHG) emissions, energy use, water use and solid waste-to-landfill in our offices, manufacturing and distribution operations. To accelerate our progress and drive Purpose Driven Growth – growth that’s profitable, sustainable and responsible – we’ve also re-imagined how we work to drive sustainability deeper into our brands and organization. With a business-led vision for sustainability, enabled by our passionate Sustainability Center, and activated by all employees across the company, sustainability is embedded into all aspects of our business and is everyone’s responsibility. Clorox’s integrated IGNITE Strategy puts environmental, social and governance (ESG) priorities at the forefront of our decision-making to ensure Clorox remains a leader in corporate responsibility.

## C0.2

**(C0.2) State the start and end date of the year for which you are reporting data.**

	Start date	End date	Indicate if you are providing emissions data for past reporting years
Reporting year	January 1, 2020	December 31, 2020	No

## C0.3

**(C0.3) Select the countries/areas for which you will be supplying data.**

- Argentina
- Canada
- Chile
- China
- Colombia
- Costa Rica
- Mexico
- Peru
- Philippines
- Puerto Rico
- Saudi Arabia
- United States of America

## C0.4

**(C0.4) Select the currency used for all financial information disclosed throughout your response.**

USD

## C0.5

**(C0.5) Select the option that describes the reporting boundary for which climate-related impacts on your business are being reported. Note that this option should align with your chosen approach for consolidating your GHG inventory.**

Operational control

## C1. Governance

### C1.1

**(C1.1) Is there board-level oversight of climate-related issues within your organization?**

Yes

### C1.1a

**(C1.1a) Identify the position(s) (do not include any names) of the individual(s) on the board with responsibility for climate-related issues.**

Position of individual(s)	Please explain
Other, please specify Committee of the Board of Directors	The Board of Directors Nominating, Governance and Corporate Responsibility Committee (NGCRC), comprised exclusively of independent directors, oversees Clorox's corporate responsibility and sustainability program, including all climate related issues. The committee oversees the Company's environmental, social and governance (ESG) process and approach and regularly discuss with management the strategy related to environmental goals, risks and opportunities. This committee is therefore directly responsible for overseeing the company's climate and environmental related aspects. This includes overseeing the company's climate related goals and progress. The committee is updated at least quarterly on ESG-related priorities including those related to Climate. For example, the Board Committee was apprised when Clorox developed our 2030 Ignite Goals, which specifically included committing to Science Based Targets to reduce CO2e emissions. Their alignment was obtained as part of the process for proceeding with these goals. The Committee also regularly received updates on ESG issues of relevance to our stakeholders, including stockholders, which often includes information related to climate risks, oversight and disclosure.

	<p>The full board of directors also participates in regular (at least annual) updates on ESG topics, including climate, and the full board, as part of its enterprise risk management (ERM) oversight role, also oversees the Company’s climate risks, which have been identified as long-term risks for the Company by Clorox’s ERM committee, a committee comprised of senior management, who identify, quantify and oversee enterprise risks of the Company and present to the full board of directors at least annually.</p>
<p>Chief Executive Officer (CEO)</p>	<p>The CEO, who is on the Board, is responsible for the company’s ESG strategy, which includes our overall climate strategy.</p> <p>The CEO is directly responsible for approving the company’s strategic Ignite Goals, including, for example, Climate related Science Based Targets. The CEO is tasked with ensuring that the company is actively making progress toward our climate related goals and has responsibility for meeting them. For example, when Clorox developed our Ignite Strategy, integrating our ESG Goals with our Business strategy, the CEO was responsible for reviewing and approving that integration as head of the organization and as a board member. The CEO was also provided the opportunity to have input on Climate specific goals, such as our commitment to set Science Based Targets (SBTs) and our commitment for renewable electricity. Our current CEO architected our IGNITE strategy as the Chief Operating Officer (COO), including developing our environmental goals and now has responsibility to oversee our IGNITE Strategy and goals.</p> <p>Implementation of the company’s ESG strategy is the responsibility of the ESG Executive Committee, comprised of Clorox’s EVP, Chief Growth Officer, EVP, Chief People and Corporate Affairs Officer and SVP, Chief Legal Officer, each reporting to Clorox’s CEO. They are responsible for overseeing the execution of our ESG (incl. Climate) priorities and ensuring our business strategy considers and optimizes our ESG priorities.</p> <p>Clorox continues to be committed to strong governance and ESG performance and is working to further tie elements of ESG goals to executive compensation awards.</p>

## C1.1b

**(C1.1b) Provide further details on the board’s oversight of climate-related issues.**

<p>Frequency with which climate-related issues are a scheduled agenda item</p>	<p>Governance mechanisms into which climate-related issues are integrated</p>	<p>Please explain</p>
<p>Scheduled – some meetings</p>	<p>Reviewing and guiding strategy Reviewing and guiding major plans of action</p>	<p>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</p>

	<p>Monitoring implementation and performance of objectives</p> <p>Monitoring and overseeing progress against goals and targets for addressing climate-related issues</p>	<p>(NGCRC), 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. For example, the NGCRC was presented with Clorox’s Ignite Strategy, which integrates our ESG goals, including Climate specific Goals, with our Business strategy for review and input.</p> <p>The Board was engaged in the plan and timing to roll out the new strategy. The board was also engaged on the specific climate related targets (SBTs in 2 years, 100% Renewable Electricity for North American sites by 2025), including the implementation and target dates.</p> <p>The company’s progress against the Climate specific goals and targets are included as part of the quarterly updates to the NGCRC. These updates include performance of the Climate related goals and objectives, status of any progress and upcoming priorities for the Climate related goals (e.g. SBTs, Renewable Electricity). The NGCRC receives updates on key ESG topics at least quarterly, including frequent updates on climate issues, climate governance, GHG goals, and areas of developing focus from key stakeholders related to climate change. As noted previously, the full Board oversees Clorox’s enterprise risk management program, which includes the specifically identified risk of climate change and also takes note of the long-term nature of Climate risk, which extends well beyond typical business planning cycles and enterprise risk time horizons.</p> <p>The full board of directors receives regular ESG updates on key topics from members of Clorox’s management team, including members of its ESG Executive Team. The company’s ESG Executive Team, comprised of Clorox’s EVP, Chief Growth Officer, EVP, Chief People and Corporate Affairs Officer and SVP, Chief Legal Officer – each reporting to Clorox’s CEO – is responsible for engaging the board on ESG matters including those related to climate change and overseeing the execution of our ESG priorities, ensuring our business strategy considers and optimizes our ESG priorities and our business appropriately provides disclosure around our</p>
--	--	---

		<p>ESG progress and performance. Clorox continues to be committed to strong governance and ESG performance and is working to further tie elements of ESG goals to executive compensation awards.</p>
	<p>Reviewing and guiding risk management policies</p>	<p>Clorox has a comprehensive enterprise risk management process to identify, assess and prioritize potential business risks. The process includes identifying risks, assessing exposures and quantifying the value at risk. The evaluation considers level of impact, the vulnerability to an event based on the time and capacity to react and adapt, and likelihood of an occurrence.</p> <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.</p> <p>The committee approves our processes; prioritizes and allocates resources; oversees and reviews risk identification and mitigation, tactics and assessments. Executive risk owners are then identified to further assess risks and develop, monitor, manage and be accountable for mitigation strategies for risks they own; escalate issues and request resources as appropriate. The ERM steering committee reports at least annually to the Board of Directors, including on ESG risks (including climate).</p> <p>For example, the ERM Committee has identified climate risk as one of Clorox’s top enterprise risks and has advised the Board of Directors of this risk and is working to develop, under the oversight of the Board and with internal and external resources, scenario plans, strategies and action plans to address climate risks and decarbonize our business in furtherance of our publicly stated climate goals.</p>

## C1.2

**(C1.2) Provide the highest management-level position(s) or committee(s) with responsibility for climate-related issues.**

Name of the position(s) and/or committee(s)	Responsibility	Frequency of reporting to the board on climate-related issues
Chief Executive Officer (CEO)	Both assessing and managing climate-related risks and opportunities	Annually
Other C-Suite Officer, please specify ESG Executive Committee: - EVP Chief Growth Officer - EVP Chief People and Corporate Affairs Officer - SVP Chief Legal Officer  <sub>1</sub>	Both assessing and managing climate-related risks and opportunities	Quarterly
Chief Financial Officer (CFO)	Assessing climate-related risks and opportunities	As important matters arise
Risk committee  <sub>2</sub>	Assessing climate-related risks and opportunities	Annually
Other C-Suite Officer, please specify Chief Sustainability Officer (CSO)	Both assessing and managing climate-related risks and opportunities	Not reported to the board
Sustainability committee  <sub>3</sub>	Both assessing and managing climate-related risks and opportunities	Not reported to the board

<sub>1</sub>The EVP Chief Growth Officer is responsible for reporting Climate issues to the Board Committee (NGCRC) on a quarterly basis.

<sub>2</sub>Enterprise Risk Management (ERM) Steering Team

<sub>3</sub>Sustainability Center

## C1.2a

**(C1.2a) Describe where in the organizational structure this/these position(s) and/or committees lie, what their associated responsibilities are, and how climate-related issues are monitored (do not include the names of individuals).**

The CEO is responsible for the company’s Climate related strategy, including recommended strategies, goals, progress, and tracking. The CEO, is responsible for assessing that information and acting on it as required or recommended. The CEO is also tasked with ensuring that there is a team in place, led by the ESG Executive Team (described below) who report to the CEO, to execute the company’s climate goals, ensuring that the goals are appropriately set, monitored and tracked and progress is being made. The CEO reports ESG updates, which include Climate, to the Board annually.

The company’s ESG Executive Team, comprised of Clorox’s EVP, Chief Growth Officer, EVP, Chief People and Corporate Affairs Officer and SVP, Chief Legal Officer – each reporting to

Clorox's CEO – is responsible for overseeing the execution of our ESG priorities and ensuring our business strategy considers and optimizes our ESG priorities, including our Climate goals. The ESG Executive Team is responsible for helping to develop and make recommended climate ambitions to the CEO and oversee and assess progress on the climate goals. The Chief Growth Officer reports ESG updates, which include Climate, to the Board Committee (NGCRC) quarterly.

The VP, Chief Sustainability Officer leads our Sustainability Center, with executive oversight by the EVP, Chief Growth Officer, who is a member of the company's ESG Executive Committee and reports to Clorox's CEO. Environmental priorities are overseen by our Chief Sustainability Officer, who leads our Sustainability Center and is responsible for making environmental sustainability-related recommendations to Clorox's Senior Leadership. The Sustainability Center is responsible for defining, driving and tracking progress against Clorox's sustainability strategy, assessing the progress, and presenting it to the Senior Leadership. This team serves as an enabling organization, building capability and supporting business units and functions in delivering both corporate planet goals, and business unit sustainability goals. This includes developing and recommending Climate related strategies to the organization, working closely with the various functions and businesses within Clorox to integrate climate considerations into their processes and decision-making, and measuring and reporting our climate-related footprint and progress against goals and metrics to the company and external stakeholders. The Sustainability Center's leadership team includes Vice Presidents and Senior Directors responsible for sustainability commercialization, technology, operations and supply chain, and strategy and performance, with each role supported by teams connected into the core functions.

Each business unit leadership team, led by a VP-General Manager, is responsible for defining and achieving a strategic sustainability plan for its portfolio of brands that will help deliver corporate IGNITE ESG goals and advance its brands towards becoming a sustainable business. Each business unit leadership team designates a sustainability champion to lead its sustainability agenda and monitor progress.

Clorox's Enterprise Risk Management (ERM) Steering Team, is comprised of members of Clorox's senior management and chaired by our VP of Global Risk Management with executive oversight from the CFO and Chief Legal Officer. The ERM Committee has specifically identified Climate Risk as one of Clorox's top enterprise risks. The ERM team has responsibilities related to monitoring risks and opportunities related to climate issues. Clorox has a comprehensive enterprise risk management process to identify, assess and prioritize business risks. The process includes identifying potential 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.

This Steering committee approves the framework and processes; prioritizes and allocates resources; oversees and reviews risk identification and risk mitigation strategies, tactics and assessments. Individual executive risk owners are then 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. The ERM office, through the Chief Financial Officer, reports directly to the company's Board of Directors and provides the Board key ERM updates, including reporting on ESG, including Climate risks if applicable, at least

annually. Their scope includes climate related risks and opportunities across our operations and value chain.

### C1.3

**(C1.3) Do you provide incentives for the management of climate-related issues, including the attainment of targets?**

	Provide incentives for the management of climate-related issues	Comment
Row 1	Yes	<p>Clorox has integrated ESG goals into our long-term, corporate IGNITE strategy. These goals are referred to as IGNITE ESG Goals and include:</p> <ul style="list-style-type: none"> <li>- Set and achieve science-based targets to reduce greenhouse gas (GHG) emissions in our operations (scope 1 and 2) and across our value chain (scope 3), and</li> <li>- 100% renewable electricity in the U.S. and Canada in 2021</li> <li>- 50% combined reduction in virgin plastic and fiber packaging</li> <li>- 100% global facilities zero-waste-to-landfill</li> </ul> <p>Our IGNITE Strategy also includes Governance goals to “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 operationalized by establishing executive compensation awards that are tied to elements of our ESG goals for members of the Clorox executive committee, including for the CEO. Clorox continues to be committed to strong governance and is working to tie elements of ESG goals to executive compensation awards.</p>

### C1.3a

**(C1.3a) Provide further details on the incentives provided for the management of climate-related issues (do not include the names of individuals).**

Entitled to incentive	Type of incentive	Activity incentivized	Comment
Chief Executive Officer (CEO)	Monetary reward	Emissions reduction project Emissions reduction target	Clorox has committed to having Executive compensation awards tied to elements of our ESG goals for members of the Clorox executive committee, including for the chair and CEO. The CEO is overall responsible for the Climate related IGNITE Goals, including Science Based Targets.
Other, please specify	Monetary reward	Emissions reduction project	Performance against delivering Sustainability Strategy [across full value chain]. This includes

Chief Sustainability Officer		Emissions reduction target	the Climate related IGNITE Goals (SBT's, Renewable Energy).
Other, please specify Sustainability Center	Monetary reward	Emissions reduction project Emissions reduction target Behavior change related indicator	The Sustainability Center works closely with our business units and is responsible for defining and achieving our sustainability goals, including those focused on plastic and waste reduction, science-based climate action, and responsible product stewardship. The Sustainability Center members are rewarded, in part, for their performance delivering on the company's Sustainability Strategy.
Management group	Monetary reward	Other (please specify) Business Specific Sustainability Goals	Our ESG Goals are rolled out to the entire organization. Each business unit leadership team, led by a VP-General Manager, is responsible for defining and achieving a strategic sustainability plan for its portfolio of brands that will help deliver corporate ESG goals and advance its brands towards becoming a sustainable business. Each business unit leadership team designates a sustainability champion to lead and facilitate its sustainability agenda. Business unit leaders and their team members are rewarded, in part, for their performance delivering on their specific business specific Sustainability strategy and goals. Annual ESG targets are established for the year and placed in individual objectives of employees who can directly impact them.
All employees	Non-monetary reward	Other (please specify) Any Sustainability Related Project	Employees are recognized for their efforts through an internal company recognition system. The system allows for peer-to-peer and manager driven recognition, and may be eligible for reward points that can be used to purchase online gifts. The recognition process includes categories that cover Sustainability Goals or projects.

## C2. Risks and opportunities

### C2.1

**(C2.1) Does your organization have a process for identifying, assessing, and responding to climate-related risks and opportunities?**

Yes

## C2.1a

**(C2.1a) How does your organization define short-, medium- and long-term time horizons?**

	From (years)	To (years)	Comment
Short-term	1	3	These time horizons reflect our short, medium, and long term strategy and planning cycles. These climate-related time horizons are consistent with other business practice time horizons.
Medium-term	3	6	These time horizons reflect our short, medium, and long term strategy and planning cycles. These climate-related time horizons are consistent with other business practice time horizons.
Long-term	6	10	These time horizons reflect our short, medium, and long term strategy and planning cycles. These climate-related time horizons are consistent with other business practice time horizons.

## C2.1b

**(C2.1b) How does your organization define substantive financial or strategic impact on your business?**

Our risk identification processes are applied at the company / enterprise level as well as at the specific brand level. At a company-wide level, we identify potential physical, regulatory, reputational, changing consumer trends/awareness and any other risk factors associated with climate change, GHG emissions, energy consumption and water consumption. This is done at the corporate level with the cross-functional Corporate Sustainability Center and cascaded to various internal stakeholders, business and functional units as appropriate.

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 a percentage of 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. Clorox utilizes COSO's three-lines of defense model whereby each of the three lines play a distinctive role within Clorox's wider governance structure for effective risk management. Similar to the model, Clorox's first line lies with the business and process owners who own and manage risks. The second line is put in place to provide internal monitoring and oversight. Lastly, the third line provides independent assurance to senior management and the Board of Directors concerning the effectiveness of management controls.

Our ERM Center of Expertise (ERM COE) has integrated processes with Strategic Planning and Internal Audit. On an annual basis, enterprise risks are refreshed, with a three year outlook, based on input from the Functions and Business Leaders. The Leaders provide

updates on existing risks and/or identification of emerging risks as they complete and think about the risks that could impact their strategy and objective. ERM COE will then aggregate, prioritize and assess based upon potential impact (which includes financial, reputational, customer, consumer, among other categories) and vulnerability, which takes into consideration likelihood and our ability to respond quickly to the risks. ERM COE then partners with Internal Audit to conduct stakeholder interviews to better understand risks and mitigation plans as it relates to people, operations, strategy, compliance, technology and emerging issues. All risks are assigned an Executive Risk owner and is reported to the ERM Steering Committee, consisting of senior leaders across the organization. Ultimately, the information is then provided to The Executive Operations Leadership Team and the Board of Directors. We understand that climate change risks can impact the entire organization over a long time horizon and as such, all climate change risks are carefully integrated into the company's overall risk management strategy.

## C2.2

### **(C2.2) Describe your process(es) for identifying, assessing and responding to climate-related risks and opportunities.**

---

#### **Value chain stage(s) covered**

Direct operations  
Upstream  
Downstream

#### **Risk management process**

Integrated into multi-disciplinary company-wide risk management process

#### **Frequency of assessment**

More than once a year

#### **Time horizon(s) covered**

Short-term  
Medium-term  
Long-term

#### **Description of process**

Clorox has a multi-tiered, multi-disciplinary risk management process. That covers short-, medium-, and long-term time horizons. Clorox's Enterprise Risk Management Program evaluates risks associated with the Company, such as Climate related risks, based on a number of criteria, which include but are not limited to quantitative definitions such a percentage of 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. For example, the ERM Steering Team identified Climate Risk as one of Clorox's top enterprise risks because of the degree to which it could impact the organization and our operations over long time (multi-decades) horizons and the likely significant financial impacts associated with rising global temperatures on our operations, the habits of customers and consumers and other impacts.

Clorox utilizes COSO's three-lines of defense model whereby each of the three lines play a distinctive role within Clorox's wider governance structure for effective risk management. Similar to the model, Clorox's first line lies with the business and process owners who own and manage risks. The second line is put in place to provide internal monitoring and oversight. Lastly, the third line provides independent assurance to senior management and the Board of Directors concerning the effectiveness of management controls. Among other functions that are part of the second line, the Enterprise Risk Management (ERM) program was established by Clorox to provide a sustainable framework to proactively identify, understand, assess, prioritize, articulate and continuously manage risks, both existing (short-term) and emerging (medium-, long-term), across the entire organization.

Our ERM Center of Expertise (ERM COE) has integrated processes with Strategic Planning and Internal Audit. On an annual basis, enterprise risks are refreshed, with a three year outlook, based on input from the Functions and Business Leaders. The Leaders provide updates on existing risks and/or identification of emerging risks as they complete and think about the risks that could impact their strategy and objective. ERM COE will then aggregate prioritize and assess based upon potential impact (which includes financial, reputational, customer, consumer, among other categories) and vulnerability, which takes into consideration likelihood and our ability to respond quickly to the risks. ERM COE then partners with Internal Audit to conduct stakeholder interviews to better understand risks and mitigation plans as it relates to people, operations, strategy, compliance, technology and emerging issues. All risks are assigned an Executive Risk owner and is reported to the ERM Steering Committee, consisting of senior leaders across the organization. Ultimately, the information is then provided to the Business Operations Leadership Team and the Board of Directors. We understand that climate change risks can impact the entire organization and as such, climate change risks are carefully integrated into the company's overall risk management strategy.

At a brand / asset level, risks and opportunities as related to climate change are identified taking into account the product portfolio, the unique characteristics and sourcing of each product and the location in which the ingredient is sourced and/or manufactured. For example, our Kingsford charcoal operations might involve regulatory risks associated with GHG emissions released as part of the charcoal manufacturing process, while the Clorox bleach production may have water supply related risks associated with it. Similarly, the Glad business assess the financial and technological risks associated with transitioning to more PCR in their products balanced against the opportunity associated with increased sales and reduced climate impacts (emissions). All of our brands are subject to the same climate change risk factors that we use at the enterprise level and assess those risk accordingly.

Our Global Strategic Sourcing group (GSS) utilizes a supply chain risk management

software, RiskMethods, to identify, assess and mitigate supply chain risks across our supplier network. RiskMethods is a technology driven service that uses data and machine-learning artificial intelligence to enable supply chain mapping and real-time alerts and notification of risk factors, such as operational and financial factors. RiskMethods enables us to better monitor our supply chain and to act quickly based on the various risk factors, as needed.

We assess Climate related risk in our downstream supply chain at both the customer and consumer level. This includes engagement with our customers and the use of tools such as Life Cycle Analysis (LCA) to evaluate the downstream climate related risks in the consumer use phase of our products. The LCA provides more insight on the unique category footprints of our businesses throughout the value chain, helping us understand where a deeper dive is needed and where efforts can best be focused to inform our future sustainability innovations and enhancements

Executive Team Meetings: Clorox's Enterprise Risk Management Steering Team, comprised of Senior Leaders across the Company, meets approximately quarterly to review and align on risks and mitigation strategies at the enterprise level. The results of our risk management studies, including climate change risks, are reported to the Clorox Executive Committee, headed by the CEO, and to the Clorox Board of Directors.

---

**Value chain stage(s) covered**

Direct operations

**Risk management process**

Integrated into multi-disciplinary company-wide risk management process

**Frequency of assessment**

Annually

**Time horizon(s) covered**

Short-term

Medium-term

**Description of process**

The Global Safety and Environmental Team (GSE) maintains an environmental management system (EMS) that tracks, reports and enables continuous improvement to help advance the company's sustainability goals. Sustainability tracking includes facility specific footprints (e.g. energy, greenhouse gas, water, and waste). This data is compiled and reviewed at least annually and is compared to baseline to identify whether we are meeting our commitments to reduce energy and water use.

The EMS is used at all Global Locations and includes a task management system designed to identify and track compliance with applicable environmental regulations, including any climate specific regulatory requirements. For example, GHG emissions at certain facilities are reported to state agencies, other locations must track and report any refrigerant releases in accordance with state and federal reporting requirements. EMS tasks are reviewed at least annually to ensure that each location is meeting the regulatory requirements, including any new, climate specific, obligations. As part of the

EMS process, the GSE team oversees external or internal audits conducted at all Clorox-owned manufacturing facilities at least once every two years to identify and mitigate environmental risks.

---

**Value chain stage(s) covered**

Direct operations  
Upstream

**Risk management process**

Integrated into multi-disciplinary company-wide risk management process

**Frequency of assessment**

More than once a year

**Time horizon(s) covered**

Short-term  
Medium-term

**Description of process**

Business Continuity Plans (BCP): Clorox's has a BCP process that is designed to ensure that the company is able to respond effectively and recover quickly from a potential crisis or business disruption, including climate related disruptions. The BCP process includes identification of potential risks, strategies and plans to mitigate the impacts of those risks, and ongoing program management to enhance response capabilities or address new risks. The BCPs focuses on four areas; loss of site, loss of people, loss of business, and loss of a key vendor or a key suppliers, which covers both our upstream and direct operations value chains. Crisis management and business continuity addresses risks associated with climate change related to severe weather events or disruptions, such as fires, floods, or hurricanes. One goal is to ensure our ability to deliver products to our customers after a business disruption, which covers the downstream value chain.

The crisis management structure is organized using principles from the Incident Command System (ICS), a pre-defined, adaptable and scalable organizational recovery framework. The Emergency Operations Center (EOC), an on-call organization, responsible for managing the Company's overall crisis management response. When activated, the EOC is the highest enterprise operational authority. Key responsibilities include supporting site response and business continuity teams, monitoring the affected unit's or units' overall operational status, coordinating among different response teams and company executives, helping to prioritize response actions, and securing the resources required for restoration and recovery. Clorox functions or business entities are responsible for developing and maintaining operation specific BCPs using the enterprise wide tools and processes. Maintenance of the BCPs or associated exercises are tracked on a quarterly scorecard and shared with the Clorox Executive Committee and BCP stakeholders and team leaders.

As examples, the crisis management process was enacted during the Hurricanes of 2017, which impacted multiple locations. Our Caguas Puerto Rico plant utilized the site

specific plan to restart and maintain operations during a significant and long disruption of the local power supply. The site secured additional generator capacity, obtained fuel to keep the generator's operating, and routinely checked to ensure that it was meeting any permit requirements or emergency orders. Through this process, the plant was able to maintain operations during an extended period of time when local power was not available. In cases where there is sufficient advance notice of a potentially severe weather event, the business will stockpile product in order to facilitate delivery immediately after the disruption.

---

**Value chain stage(s) covered**

Direct operations  
Upstream  
Downstream

**Risk management process**

A specific climate-related risk management process

**Frequency of assessment**

Annually

**Time horizon(s) covered**

Short-term  
Medium-term

**Description of process**

The Sustainability Insight System (THESIS): Each year Clorox's Sustainability Center completes the THESIS survey. THESIS is designed to identify sustainability "hot spots" within specific product category sectors and create metrics to address "hot spot" improvement. The survey is completed for each of our Business Units (e.g. Glad, Homecare, Laundry, Litter, Foods, Kingsford, Burt's Bees, etc.). The survey covers potential impacts around the entire value chain, from supply chain sourcing (upstream), to manufacturing (direct operations), to consumer use (downstream). Each year teams in R&D, Global Sourcing, and Operations work together to compile the data and complete the surveys. The results of the survey are shared with select Business Units to identify potential areas of strength and weakness. The BUs' and the Center use these results to assess the risk associated with the hot spot and evaluate the steps needed, if any, to address the risk.

The team uses the THESIS system, which is a third party software tool, to enter business specific data. THESIS generates a report with KPI's that quantify the level of risk on a percentage basis. Clorox's sustainably center presented the THESIS results to customer teams and to the Glad, Homecare, and Brita business units. These teams assessed the results and implemented plans to address any perceived gaps. Glad, for example, identified a risk and potential opportunity to improve environmental stewardship around managing plastic resins through increased advocacy. Brita and Glad both recognize the risk associated with the recycled content of their products,

which they are addressing in their business focused sustainability plans. The Sustainability Center identified an opportunity around better data acquisition of our supply chain worker health and safety programs, enabling the company to report how this “hot spot” is being addressed. As a result, sourcing is planning to reach out to select upstream suppliers through an audit process to assess their programs. If successful, this model may be adapted for the other business. Other KPI’s resulting from the THESIS survey reinforced the work that Clorox is already doing to meet our Ignite goals, such as driving climate related targets into our upstream businesses. The THESIS survey is valuable tool that Clorox uses to identify and address potential risks associated with sustainability hotspots within our specific product categories.

## C2.2a

### (C2.2a) Which risk types are considered in your organization's climate-related risk assessments?

	Relevance & inclusion	Please explain
Current regulation	Relevant, always included	Clorox is committed to ensuring that our manufacturing facilities around the world comply with, and often exceed, what’s required by federal, state and local laws and regulations. The scope of the work done to help ensure we meet those requirements is significant and includes biodiversity, emissions, as well as managing environmental compliance. All our operations meet applicable regulatory standards. Clorox tracks and complies with climate- related regulatory frameworks globally using an Environmental Management System (EMS). All of our sites are audited for environmental compliance every two years, which includes regulations applicable to climate change. The Clorox Company’s environmental standards are also used in assessing this issue. Current regulations evaluated include regulations related to greenhouse gas emissions as well as regulations related to energy sourcing and regulations of emissions from various manufacturing sources. An example of current regulations with potential impacts includes state regulations around greenhouse gas emissions or carbon tax initiatives that could impact plants with air permits. We monitor these regulations to ensure compliance and to evaluate any potential future risk. . The environmental audits conducted every two years are part of our overall risk management process for managing regulatory risks. The audit program uses third party software that monitors regulations for changes. That ensures that the operations are meeting the most current and up to date environmental regulatory requirements.
Emerging regulation	Relevant, always included	Clorox closely monitors legislative and regulatory proposals, including climate change initiatives that may impact business operations, through our Government Affairs office. Clorox communicates with policymakers on a broad range of manufacturing and consumer product issues through comments on proposed regulations through direct engagement

		<p>with industry associations as well as engagement with national, state and local policymakers, both domestically and internationally. Clorox belongs to state and national trade associations that sometimes engage in climate change policy discussions on behalf of industry. As a result of this, Clorox proactively manages any regulatory risks that might arise in the future.</p> <p>Some examples of potential emerging regulatory risks include municipal regulations regarding the banning of plastic bags and other packaging restrictions as well as carbon pricing mechanisms to reduce greenhouse gas emissions and regulations requiring use of lower emission energy sources. The Clorox Company has operations in the following countries or regions, which have existing or pending carbon taxes or Emissions Trading Schemes (ETSs): Mexico, Colombia, Chile, Argentina, Ontario/Canada, China and California/ USA. Emerging regulations such as carbon taxes or ETF's are examples of a risk that could impact our business in other states, regions, or countries. Because the GHG footprints of individual production facilities are relatively small compared to proposed regulatory thresholds for cap and trade, Clorox believes the risk presented by future regulation and general risks related to climate change are manageable given our current approach and planned initiatives.</p>
Technology	Relevant, always included	<p>Our climate-related risk management approach includes the assessment of technology related to renewable energy, fuel cells and carbon capture and storage and how these technologies can impact our overall environmental footprint as well as affect our production and distribution costs our overall competitiveness. We also look at how our timing in adopting these new technologies will impact our business. In addition, we consider how new technologies and process changes will affect our business as we look to optimize technology in our operations to meet the requirements of transitioning to a low-carbon economy. Examples of technology range from identifying alternatives that will enable plants to transition away from petroleum fuel sourced equipment to optimizing existing processes like charging schedules of forklifts to avoid peak demand hours, to installing process equipment to monitor the performance and efficiency of manufacturing equipment.</p> <p>The Company's Engineering and R&amp;D units assess new technologies as part of project and product development, respectively. The Engineering teams engage with consultants to evaluate various technologic and efficiency improvements to existing equipment such as palletizers, energy control systems. Both teams work in coordination to identify new technologies that will help achieve the company's Ignite ESG (climate) goals. The individual business units also engage in technology discovery efforts to identify ways to achieve the company's</p>

		<p>climate based objectives. For example, our Kingsford plants are considering heat recovery units to help reduce reliance on fossil fuels as a technology that is both an opportunity and a risk for the business (the opportunity would be to reduce reliance of fossil fuels with the risk being related to the cost of the technology, the ability of the technology, and the return on investment).</p>
Legal	Relevant, always included	<p>Our climate-related risk management approach takes into account legal risk. This assessment includes regulatory risks related to climate change laws and regulations. Other risks include failure to have proper business continuity plans in place to respond to climate related risks. Climate risks are also considered through our compliance management program and internal audit process. Legal works in coordination with other teams (e.g. Government Affairs, Sustainability Center, Operations, Internal Audit, Risk Management) to assess the impact of Climate related issues. Examples include monitoring of regulations related to air permitting and pending carbon taxes or emissions trading schemes. New air regulations, for example, have the potential to impact cost of operations at facilities that have complex air permits, such as our Kingsford plants. Legal is also integrated into climate related risks assessments as it relates to the potential for external litigation.</p>
Market	Relevant, always included	<p>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 Purpose Driven Growth. Clorox has an ambitious set of environmental, social and governance (ESG) leadership goals integrated with our strategic business choices, as part of our integrated long-term corporate strategy called IGNITE. Our IGNITE strategy integrates environmental, social and governance priorities with our business priorities, furthering our vision of earning people’s enduring loyalty in the Market and creating long-term value for all stakeholders.</p> <p>Our climate-related risk management approach takes into account market factors. Our stockholders are increasingly demanding proactive steps in managing, overseeing, disclosing and planning for business disruptions and opportunities related to climate change. The ability to engage with and meet the expectations of our investors can impact the price of our publicly traded stock, and it can impact the support management and our board of directors receive in our annual meetings of stockholders.</p> <p>Additionally, as climate related risks and opportunities are an increasing part of how customers and consumers evaluate products, we evaluate the possible shifts in supply and demand for certain raw materials we purchase and also products that we manufacture. As we consider operational changes necessary to prevent increases in global temperature, we also consider the resilience and adaptability of our product portfolio to climate-related market trends and stakeholder</p>

		<p>expectations around business continuity preparedness. Market expectations around product sustainability influence our eco-goals and metrics.</p> <p>Each of our Business Units (e.g. Glad, Kingsford, Litter, Brita, Household, Natural Personal Care, Vitamins Minerals and Supplements, etc.) is tasked with developing Strategic Sustainability Plans. These plans detail how they will intend the companies Ignite Goals ESG (incl. Climate goals). The plans identify the market opportunities toward achieving the goals and, in part, help ensure that Clorox will meet our climate related commitments. One example of a market based opportunity (and risk) is the investment in Loop with our Foods, Food Bags, and Wipes test marketing reusable containers and assessing the overall viability of these programs.</p>
Reputation	Relevant, always included	<p>Our climate-related risk management approach takes into account reputational risk, as perceptions of an organization’s position on climate change matters can impact corporate reputation. Climate change, as part of a broader ESG and corporate reputation framework, continues to be one of the primary material aspects, influencing our climate strategy. Our approach includes disclosure to the CDP reporting platform as well as participation in various reporting frameworks, ratings platforms and customer-related initiatives such as Walmart's Gigaton program. In addition, we embed our eco-efforts into other aspects of corporate social responsibility through efforts such as our Safe Water Project, which provides clean drinking water to communities in Peru and Kenya. An example of how risk related reputational impacts are evaluated would be the risk related to changing consumer preferences around increased PCR packaging. We have evaluated risks associated with increasing levels of PCR packaging including product and packaging compatibility risks and the short and long term availability of PCR resin, all of which have the potential for either positive or negative impacts to the company’s reputation. Additionally, Clorox’s reputation with its investors, or prospective investors, can impact investment or voting decisions, which has impacts on our stock price or support for management or our board of directors.</p>
Acute physical	Relevant, always included	<p>Our climate-related risk management approach includes the assessment of acute physical climate risks on our business operations which include increased severity of extreme weather events like hurricanes, tornadoes and floods, as such events could result in damage to facilities and disruption of business. Clorox’s property insurer conducts annual visits to many of its sites and evaluates its infrastructure and makes recommendations for improvements as needed. We also have robust business continuity plans and a crisis management team, which focuses on recovering and restoring operations as quickly as possible and ensuring that our people are safe</p>

		in the event of any natural disasters. For example, we implemented plans to address acute physical risks to during Hurricanes Harvey and Irma hit our Houston and Puerto Rico plants in August and September 2017.
Chronic physical	Relevant, always included	Our climate-related risk management approach includes the assessment of chronic physical climate risks on our business operations which include variations in precipitation and temperatures which could impact water availability or increase risk of natural fires. Such events could impact the availability and cost of raw materials. Clorox's GSS group utilizes a supply chain risk management software, RiskMethods to proactively identify, assess and mitigate supply chain risks across over 16,000 direct materials suppliers. Overall, RiskMethods enables us to better monitor our supply chain and to act quickly and swiftly based on the various risk factors, as needed. We also certify secondary and tertiary suppliers as appropriate.

## C2.3

**(C2.3) Have you identified any inherent climate-related risks with the potential to have a substantive financial or strategic impact on your business?**

Yes

### C2.3a

**(C2.3a) Provide details of risks identified with the potential to have a substantive financial or strategic impact on your business.**

#### Identifier

Risk 1

#### Where in the value chain does the risk driver occur?

Direct operations

#### Risk type & Primary climate-related risk driver

Current regulation  
Carbon pricing mechanisms

#### Primary potential financial impact

Increased direct costs

#### Company-specific description

Carbon Pricing Risk: Transitional risks identified as part of our risk management process include the risk of increases in current and emerging regulations related to climate-related financial policies consistent with a low-carbon economy scenario. The company's processes have identified such risks to include increases in global carbon cap and trade schemes, taxes and the carbon pricing which would have a direct impact

on our operations. Increased regulations could increase the cost of energy, fuel, and operations that produce direct emissions as well as increase product distribution costs. The Clorox Company has operations in the following countries or regions, which have existing or pending carbon taxes or Emissions Trading Schemes (ETS): Mexico, Colombia, Chile, Argentina, Ontario/Canada, China and California/USA. Operations in these locations have the potential to be directly impacted by the cost of Carbon Taxes or ETSs. Because the GHG footprints of individual production facilities are relatively small compared to proposed regulatory thresholds for cap and trade, Clorox believes the risk presented by future regulation and general risks related to climate change are manageable given our current approach and planned initiatives. Carbon taxes are paid by these operations when they are passed on by the utilities, but we are not directly taxed for carbon emissions. Similarly, we currently are not impacted by these emissions trading schemes as our industries are not currently in scope or our levels of emissions. However, we recognize the risk to our operations and work to understand and minimize the potential risk and stay abreast of changes in regulations in the countries and regions in which we operate.

**Time horizon**

Medium-term

**Likelihood**

More likely than not

**Magnitude of impact**

Low

**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)**

10,000

**Potential financial impact figure – maximum (currency)**

80,000

**Explanation of financial impact figure**

The impact to our business would include fees and taxes related to emissions from our manufacturing sites in countries /regions we operate in that have carbon taxes or ETS programs. Currently, emissions from our operations are below the threshold for fees/ taxes or our industries are not impacted by fees/taxes in countries where carbon taxes or ETS programs exist. However, the potential exists for our businesses to be impacted should regulations change regarding industries impacted or emissions thresholds. Based on our current emissions in countries where current regulations exist, should these regulations change to impact our business, we calculate our estimated costs to be in the range of \$10,000 to \$80,000 per year. These estimates are based on our current carbon tax rates (Chile @\$5USD/MTCO<sub>2e</sub>; Argentina @\$1 to 10USD/MTCO<sub>2e</sub> and

Canada @\$20 to \$50CN/MTCO<sub>2e</sub> Natural Gas consumption) increasing two fold over the next 10 years in those countries. We are not anticipating additional carbon taxes on our energy use or on our direct emissions based on strategy of 100% renewable electricity in the US in 2021.

**Cost of response to risk**

100,000

**Description of response and explanation of cost calculation**

Our management method focuses on driving energy efficiency improvements in our operations, using lower carbon sources of energy, and investing in renewable energy projects, and purchasing offsets. In addition, we set both energy and greenhouse gas reduction targets. In 2018, we implemented energy efficiency and savings projects as a continuation of projects identified during our global facility energy audits. Projects include lighting upgrades, boiler replacements, and packaging line upgrades. These projects are tracked at both the corporate and site level and reported and tracked by our corporate sustainability resources. In addition, we met our corporate goals to reduce energy and greenhouse gas emissions by 20% by 2020. We closed the goal period early, having reduced our energy usage by 18% and our GHG emissions by 33% per case of product sold in 2018 versus a 2012 baseline year. In 2020 we achieved a 15% reduction in Energy an 11% reduction in GHG emissions a production basis (per stat case sold) relative to our updated 2018 baseline.

We continue to optimize our renewable electricity generation at our Fairfield, CA facility. These reductions will minimize our exposure to risks related to carbon taxes. Our global procurement sourcing function also partners with our Energy Procurement vendor to optimize the cost we pay for energy and find opportunities for the procurement of low carbon energy. Our cost of management of \$100,000 includes costs to manage our utility procurement program. Associated costs to manage also include the purchase of offsets for emissions associated with our Burt's Bees business. Additional costs would be expected if the company needs to engage with a third party to assist with a country or area specific procurement requirements.

**Comment**

This response may contain "forward-looking" statements based on management's current views, beliefs, assumptions and expectations regarding future events and speak only as of the date of this submittal. The company undertakes no obligation to publicly update or revise any "forward-looking" statements, whether as a result of new information, future events or otherwise, except as required by the federal securities laws.

---

**Identifier**

Risk 2

**Where in the value chain does the risk driver occur?**

Upstream

**Risk type & Primary climate-related risk driver**

Acute physical  
Increased severity and frequency of extreme weather events such as cyclones and floods

**Primary potential financial impact**

Increased direct costs

**Company-specific description**

Extreme Weather Risk - The intensity of extreme weather events is projected to increase in the future. Scientists believe that changes in precipitation patterns owing to warming oceans or glacial melts are likely to cause extreme weather conditions and storms, heat waves, floods and droughts with increased frequency. Severe storm events and increased frequency and destructive power of tornadoes and hurricanes, in addition to subsequent flooding as a result of hurricanes, have the potential to disrupt Clorox manufacturing operations as a result of damage to our manufacturing facilities as well as loss of utility services. There is all the potential for supply chain disruptions, which could impact the availability of raw materials as well as cause logistical challenges in shipping finished product to our customers. We have contingency plans in place to minimize the effects of weather on our supply chain.

**Time horizon**

Short-term

**Likelihood**

More likely than not

**Magnitude of impact**

Low

**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)**

500,000

**Potential financial impact figure – maximum (currency)**

50,000,000

**Explanation of financial impact figure**

The potential financial impacts would be productivity loss and supply chain constraints. Most of Clorox’s production capacity worldwide is dispersed and redundant. Our global manufacturing supply chain is structured so that if there is an issue at any single manufacturing site, plants in other locations will increase production of those products to cover the consumer markets in impacted areas. In some cases, however, there are widely used commodities that are produced in localized areas that can have a larger

financial impact. Similarly, the risk scenario covers the range of costs associated with direct operations value stream impacts from a shutdown or slow-down of operations due to climate related issues (floods, drought, fires), upstream value chain impacts due to increased cost of materials from climate related supply chain disruptions, and downstream value chain impacts associated with increased transportation costs due to logistics disruptions (e.g. from tropical or winter storms). Accordingly, financial impacts would vary based on event severity and the geographic location.

Today, the impact to Clorox from a weather event could potentially be in the range of \$500,000-\$50,000,000. The lower end financial impact is based on a short term disrupting weather event and includes cost estimates related to testing alternate raw materials and for material pre-build and other logistics costs to ensure supply and continued operation. The higher end financial impact is based on a major weather event scenario that causes a long term (3 to 4 quarter) disruption in the supply of a major commodity used at multiple manufacturing locations. This estimate is based on data from a prior weather event that resulted in increased commodity costs and extrapolated using current production volumes. This risk captures a wide range of Upstream and Direct Operation Value Chain impacts ranging from increased direct costs, to increased transportation costs, to increase cost of raw materials.

#### **Cost of response to risk**

50,000

#### **Description of response and explanation of cost calculation**

Operational Risks, including natural disasters are evaluated as part of the company's overall global strategic sourcing's strategy. We assess vulnerable regions in our supply chain and the impact of weather and environmental events can impact on both price and availability of raw materials, the continuity of logistics and also assess the safety and security of operations in those areas as it relates to weather impact. We have business continuity plans for most locations and all critical functions.

As a result of learnings from recent hurricanes, we have improved and updated contingency plans to ensure both work in process and finished goods inventories are adequate leading into hurricane season. In addition, we have systems in place to incorporate hurricane contingency planning into our supply planning and forecasting process. Management costs include the administrative tasks involved in coordinating our management response and making updates to our contingency plans and are estimated to be approximately \$50,000, is based on the resources needed to assess and update on an annual basis. Clorox prepares these types of risk based scenarios for our long range planning teams so that the can incorporate them into our overall business plan.

#### **Comment**

This response may contain "forward-looking" statements based on management's current views, beliefs, assumptions and expectations regarding future events and speak only as of the date of this submittal. The company undertakes no obligation to publicly update or revise any "forward-looking" statements, whether as a result of new

information, future events or otherwise, except as required by the federal securities laws.

---

**Identifier**

Risk 3

**Where in the value chain does the risk driver occur?**

Downstream

**Risk type & Primary climate-related risk driver**

Market

Changing customer behavior

**Primary potential financial impact**

Decreased revenues due to reduced demand for products and services

**Company-specific description**

Consumer Preferences: Climate change can induce changes in consumer preferences for our products. Consumer preferences, as well as retail customer preferences, for environmentally sustainable (green) products have been increasing over the years. The Company's future performance and growth depends, in part, on its ability to successfully develop and introduce new products and line extensions and product improvements. There is always a risk that the Company's innovation cycle may not keep up with the consumer's growing demand for environmentally friendly consumer products. There is also a risk that operational costs can increase as the consumer preferences for sustainably-sourced forest commodities increases. Forest commodities, such as tree-based fiber and palm-oil when not sustainably sourced, can lead to deforestation. In addition, there is increasing consumer interest in plastic packaging that is 100% recyclable and made with substantial percentages of post-consumer recycled (PCR) vs virgin resin. Plastic pollution has gained increased attention as a contributor to climate change with plastic contamination in oceans and waterways being a major concern as well as the increasing plastic waste volumes going to landfill due to challenges with current recycling infrastructure.

We use fiber-based packaging in many of our products as both primary and secondary packaging components. In addition to packaging, we use wood-based fiber in some of our wipes products. Many of our products are in plastic, resin based containers. The company's use of palm oil ingredients is limited to derivatives of palm and palm kernel oil present in many of our product lines. In addition, meeting the demand for sustainably sourced forest commodities and the increased demand for PCR resin usage will likely result in increased operating costs. There is also a related risk to establishing goals related to PCR content in our resin based packaging as the resin industry and our suppliers have identified the availability of PCR resin as both a short and long term risk. This could have a substantial impact on our ability to meet potential future goals related to PCR content in our packaging, thus impacting our resin sourcing strategy.

**Time horizon**

Medium-term

**Likelihood**

More likely than not

**Magnitude of impact**

Low

**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)**

3,000,000

**Potential financial impact figure – maximum (currency)**

4,500,000

**Explanation of financial impact figure**

There is a negligible cost to manage fiber as the market is mature with many options for sustainably sourced fiber packaging. The financial impact would also include any additional premiums paid to procure PCR vs virgin resin and the cost to secure 100% RSPO certified palm ingredients. The cost to make substantial increases (50%) to our PCR content in plastic packaging plus the cost to procure 100% RSPO certified palm oil is estimated to be in the range of \$3,000,000 – \$4,500,000 dollars annually. These costs have been calculated through collaboration with our raw material suppliers for palm derived ingredients and our resin suppliers. The costs are based on scaling up volumes and pricing scenarios.

**Cost of response to risk**

125,000

**Description of response and explanation of cost calculation**

Clorox continues to reduce the environmental footprint of its plastic products and packaging through reducing package-to-product ratios, increased use of recycled materials and PCR content, and product innovation. We're working with our current suppliers to ensure the palm oil and derivative ingredients used in our products are from responsible sources. 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) in Indonesia that allows program members and other stakeholders to work together to bring about economic growth while protecting the ecosystem. We strive to minimize fiber use in our packaging and maximize recycled packaging fiber. We seek sustainable forestry certifications for all virgin fiber in packaging we source. We have a public goal to ensure fiber used in packaging we purchase is only from recycled or certified virgin sources.

The costs to Clorox to manage includes the costs associated with tracing our palm supply chain and is estimated to be \$125,000 per year.

**Comment**

This response may contain “forward-looking” statements based on management’s current views, beliefs, assumptions and expectations regarding future events and speak only as of the date of this submittal. The company undertakes no obligation to publicly update or revise any “forward-looking” statements, whether as a result of new information, future events or otherwise, except as required by the federal securities laws

---

**Identifier**

Risk 4

**Where in the value chain does the risk driver occur?**

Upstream

**Risk type & Primary climate-related risk driver**

Technology  
Transitioning to lower emissions technology

**Primary potential financial impact**

Increased indirect (operating) costs

**Company-specific description**

Clorox’s Ignite Goals include 100% renewable electricity for our North American Facilities, developing Science Based Targets to address climate change, and reducing our energy use relative to our 2018 baseline. While outside the 2020 reporting period, beginning in January 2021, the company achieved the renewable electricity goal using a combination of purchased unbundled Renewable Energy Credits (RECs) and a Virtual Purchase Power Agreement (VPPA). Clorox is planning additional projects that will reduce our emissions to meet our internal and future SBT commitments. Our R&D teams are conducting technology assessments and studies to identify options such as substituting virgin materials with PCR materials, which will lower our Scope 3 emissions. Once Clorox has approved SBTs, we will be advancing projects internally to reduce our emissions. Scope 3 emissions from upstream goods and services is the largest portion of our overall emission footprint so we will also be relying on emissions reductions from our top suppliers representing approximately 70% of our spending to achieve our SBTs goals.

We have identified these approaches as potential risks. First, replacement of existing raw materials with lower emission substitutes may impact product effectiveness. Second, we anticipate that most of our suppliers will focus on reducing their emissions through renewable energy sources. As such, the cost of renewable energy will likely increase with increased demand as other companies work to reduce their carbon footprint. There will likely be a similar increase in the cost of raw materials.

**Time horizon**

Medium-term

**Likelihood**

More likely than not

**Magnitude of impact**

Low

**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**

The cost of response is built into our Ignite Strategy, which integrates our Climate goals with our business goals and our operating structure. Therefore the cost to respond to these risks is set at \$0.

**Cost of response to risk**

0

**Description of response and explanation of cost calculation**

The cost of response is built into our Ignite Strategy, which integrates our Climate goals with our business goals and our operating structure. Therefore the cost to respond to these risks is set at \$0.

**Comment**

This response may contain “forward-looking” statements based on management’s current views, beliefs, assumptions and expectations regarding future events and speak only as of the date of this submittal. The company undertakes no obligation to publicly update or revise any “forward-looking” statements, whether as a result of new information, future events or otherwise, except as required by the federal securities laws.

## C2.4

**(C2.4) Have you identified any climate-related opportunities with the potential to have a substantive financial or strategic impact on your business?**

Yes

### C2.4a

**(C2.4a) Provide details of opportunities identified with the potential to have a substantive financial or strategic impact on your business.**

---

**Identifier**

Opp1

**Where in the value chain does the opportunity occur?**

Downstream

**Opportunity type**

Products and services

**Primary climate-related opportunity driver**

Shift in consumer preferences

**Primary potential financial impact**

Increased revenues resulting from increased demand for products and services

**Company-specific description**

Consumer preferences, including retail customers, for more sustainable products have been increasing. Clorox believes that changing climate conditions, global warming and an increased focus by governments and academia on climate change will increase overall awareness and concern for the environment by stakeholders ranging such as consumers. The increased level of awareness will drive long term demand and create sales opportunities for Clorox in this area.

To address this, Clorox has an ambitious set of ESG leadership goals integrated with our strategic business choices, as part of our integrated long-term corporate strategy called Ignite. These ESG goals include a focus on plastic, waste reduction and science-based climate action and goals to be a leader in responsible product stewardship, focusing on progressive actions to enhance our own and consumer packaged goods industry practices. Each business unit leadership team is responsible for developing strategic sustainability plan for its brand portfolio to help deliver corporate IGNITE ESG goals and advance its brands towards becoming a sustainable business. These business unit strategic sustainability plans are being integrated into the company's long range planning process. The strategy involves evolving our portfolio our core business through an emphasis on consumer megatrends, including sustainability.

Our Brita business has been taking advantage of changing consumer preferences around eliminating single use plastics. Brita conducted a Life Cycle Analysis showing that Brita water filters use up to 4x less CO2 emissions than using a bottle of water. Brita has committed to having zero plastic waste to landfill by 2030 (includes Brita products made of plastic; non-recyclable filters, single-use films, systems (pitchers, dispensers) and hard-sided plastic bottles). Brita partnered with TerraCycle where consumers can send old Brita products so they can be turned into recycled goods. These improvements have decreased our environmental footprint and resulted in a cost savings, mostly as a result of decreased product and packaging material use. Other examples include the concentration of our bleach products, the resin reduction in our Glad trash bags, and the packaging resin reduction in our Hidden Valley salad dressing bottles. Glad, for example, switched the drawstring colors in some of the trash bags allowing them to recycle an additional 2 million pounds of plastic, reducing operational

costs.

**Time horizon**

Long-term

**Likelihood**

More likely than not

**Magnitude of impact**

Medium

**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)**

70,000,000

**Potential financial impact figure – maximum (currency)**

350,000,000

**Explanation of financial impact figure**

During our prior goal period we tracked the NCS yearly and report against our 2020 goal of 50% product improvement by NCS in our annual report and online at [www.thecloroxcompany.com](http://www.thecloroxcompany.com). During this goal period we made sustainable improvements to over 50% of our product portfolio since the 2012 start of our goal period, achieving this goal two years ahead of our 2020 goal period end. Over 58% of our products had sustainability improvements through mid-2019, when we stopped tracking the goal.

In 2019, Clorox integrated our ESG leadership goals with our strategic business choices, as part of our integrated long-term corporate strategy called IGNITE. These ESG goals include Planet Goals with a focus on plastic and waste reduction and science-based climate action. Our estimates of the potential positive sales revenue impact to our business due to continued sustainability improvements are calculated to be in the range of 1% to 5% of gross revenues per year. This translates to a potential impact of \$70 million-\$350 million dollars based on CY20 revenues.

**Cost to realize opportunity**

0

**Strategy to realize opportunity and explanation of cost calculation**

The approach to this opportunity is embedded in our Ignite Strategy and ESG Goals. Clorox is enabling each business to become a sustainable business that delivers strong economic, environmental and social net positive benefits in a changing world. This strategy involves establishing Clorox as the pace-setter in building sustainable brands through leadership in Business Transformation, Material Reduction, and Climate

Stewardship. Each business unit leadership team is responsible for defining and achieving a strategic sustainability plan for its portfolio of brands that will help deliver our IGNITE ESG goals, including climate goals.

Material Reduction efforts range from product improvements, packaging reductions or process and efficiency improvements that reduce Clorox's overall environmental footprint. Clorox has a corporate responsibility website where we list in detail our product and packaging sustainability improvements. We believe that by communicating these improvements, we provide the consumer with more information and enable them to make informed choices when purchasing products. Each Business's strategy includes investing in R&D resources, including Technology investigations that develop these new packaging designs and product formulations. We also collaborate with manufacturing and engineering resources to ensure capital and equipment resources are available to manufacture new products and packaging to support sustainable improvements to our portfolio. Glad, for example, has achieved to date a 33% reduction in virgin materials for packaging and 99% of their packaging is recyclable, reusable, or compostable, while they've also realized at least a 10% reduction in virgin plastic in their products.

Clorox is continuing drive product improvements through our Ignite ESG goals, which include continued 50% combined reduction in virgin plastic and fiber packaging by 2030 and 100% recyclable, reusable or compostable packaging by 2025 as well as business unit specific goals.

There is no additional cost to realize this opportunity as these efforts are incorporated into our Company's overall strategic innovation planning and budgeting process with sustainability being an important driver for all of our innovation and not funded from a separate innovation budget. Clorox plans to invest in sustainable product and packaging enhancements, to address the growing demand for environmentally sustainable products by environmentally conscious consumers.

### **Comment**

The Company dedicates resources to programs designed to protect and preserve the reputation of our Company and brands. These sustainable innovations are realized through R&D investment in new product and packaging as well as life cycle analysis, capital investments and marketing and communication to our customers and consumers on our sustainable products and brands.

This response may contain "forward-looking" statements based on management's current views, beliefs, assumptions and expectations regarding future events and speak only as of the date of this submittal. The company undertakes no obligation to publicly update or revise any "forward-looking" statements, whether as a result of new information, future events or otherwise, except as required by the federal securities laws.

---

### **Identifier**

Opp2

### **Where in the value chain does the opportunity occur?**

Direct operations

**Opportunity type**

Resource efficiency

**Primary climate-related opportunity driver**

Other, please specify

Reduced Energy Use and Consumption

**Primary potential financial impact**

Reduced direct costs

**Company-specific description**

The Clorox Company realizes that reductions in energy consumption present an opportunity for energy efficiency, as well as reduced emissions and cost savings. These reductions can be achieved through energy efficiency projects such as recent projects to upgrade lighting and HVAC systems. Our engineering processes are continuously evaluating and implementing more efficient systems at our plants. Examples include installation of new palletizers at our largest home care plant, replacing a large air compressor with an on variable frequency demand (VFD) air compressor at our Houston Plant, adding a more efficient production lines at our Kansas litter plant, a new method for processing wood chips at one of our Kingsford plants. One example is the company's transition to LED lighting at several plants and distribution centers. Clorox updated their engineering standards for lighting to require LEDs for any new or replacement lights. As a result plants and distribution centers have been replacing fluorescent lighting or installing new lighting with LED lighting throughout the company.

In addition, we recognize that the use of more efficient modes of transportation also have a positive impact on greenhouse gas emissions. We use rail vs truck when possible to minimize emissions. In 2020, approximately 25% of the transportation mileage for finished goods shipments that we ship was via intermodal. Last year Clorox transitioned to a new Transportation Management System that has tools to identify where we can increase our Intermodal usage. Each year our transportation bidding process includes identifying whether our transporters are SmartWay carriers. Our 2020 SmartWay report (for Calendar Year 2019) indicated that 61% of all trucks delivering our products are SmartWay carriers. This was down from prior years as, we focused on delivery to meet demand; we see an opportunity to increase our transportation efficiency going forward.

We track our Scope 1, 2 and 3 GHG emissions to document the efficiency gains and cost reductions as well as to assist with reporting requirements in support of our energy and greenhouse gas reduction goals as well as external reporting. In addition reducing energy consumption and increasing efficiency will have a positive impact on future potential costs associated with cap and trade schemes and taxes on carbon, fuel and energy.

**Time horizon**

Short-term

**Likelihood**

Likely

**Magnitude of impact**

Low

**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)**

50,000

**Potential financial impact figure – maximum (currency)**

10,000,000

**Explanation of financial impact figure**

The financial impact is estimated to be \$50,000 to over \$1,000,000 per year. This is based on the cost of a single project to replace LED lighting to major retrofits at multiple locations in the company. Some of these costs are offset by efficiency gains/savings. We anticipate some increased costs associated with an increase in energy usage due to the growth of our business (increased production) and the impact of new business acquisitions being included in our environmental footprint.

**Cost to realize opportunity**

0

**Strategy to realize opportunity and explanation of cost calculation**

The approach to realize this opportunity is embedded in engineering programs. We have several strategies to improve resource efficiency in our Operations. We conducted an energy audit at plants with the highest energy use and identified energy savings projects. We are also building sustainability levers into our capital project management processes. We have implemented various energy efficiency projects including lighting upgrades and updates to boilers, HVAC units and packaging equipment at our manufacturing sites. For example, in 2020 three Distribution Centers upgraded their lights to LED, and at least four plants conducted small (<\$10K) to large \$500K projects to upgrade lighting to LEDs in manufacturing areas. We identify and track efficiency projects at a site and corporate level and use our footprint data to document sustainability savings.

In 2019, we reset our global footprint baseline for energy use, greenhouse gas emissions, water use, and waste to landfill to calendar year 2018. In 2020 we achieved a 15% reduction in energy use, an 11% reduction in GHG emissions, a 14% reduction in water use, and a 45% reduction in waste sent to landfill per case of product sold relative to the 2018 baseline. We use rail vs truck when possible to minimize emissions (25% of the total mileage that Clorox ships) and over 60% of all trucks delivering our products are SmartWay carriers.

There are no additional cost associated with this opportunity as the capital expenditures associated with investing in energy efficiency projects are already included in our capital budget and captured as cost savings projects. Many of these cost savings initiatives have the added benefit of energy savings.

**Comment**

This response may contain “forward-looking” statements based on management’s current views, beliefs, assumptions and expectations regarding future events and speak only as of the date of this submittal. The company undertakes no obligation to publicly update or revise any “forward-looking” statements, whether as a result of new information, future events or otherwise, except as required by the federal securities laws.

---

**Identifier**

Opp3

**Where in the value chain does the opportunity occur?**

Direct operations

**Opportunity type**

Resource efficiency

**Primary climate-related opportunity driver**

Use of more efficient production and distribution processes

**Primary potential financial impact**

Reduced indirect (operating) costs

**Company-specific description**

Clorox is enabling each business to become a sustainable business that delivers strong economic, environmental and social net positive benefits in a changing world. This strategy involves establishing Clorox as the pace-setter in building sustainable brands through leadership in Business Transformation, Material Reduction, and Climate Stewardship. Each business unit leadership team is responsible for defining and achieving a strategic sustainability plan for its portfolio of brands that will help deliver our IGNITE ESG goals, including climate goals. Businesses also identify opportunities for other businesses to improve production efficiency and reduce our energy, GHG, water, and energy footprint. These efforts are focused on reducing operational costs through more efficient production decisions at the business level.

**Time horizon**

Medium-term

**Likelihood**

Likely

**Magnitude of impact**

Low

**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**

We do not report the financial impact since it is business confidential. However, these types of projects helped to lower our costs per unit volume and reduce our overall expenses, contributing to an increase in earnings per share in the last three quarters of 2020.

**Cost to realize opportunity**

0

**Strategy to realize opportunity and explanation of cost calculation**

The cost to realize these opportunity are set \$0 since they are tied to our Ignite Goals and integrated into our Business Strategy. In 2020 several businesses implemented actions to achieve the Ignite Goals, for example: Clorox's Cleaning Division initiated a project to compact some of our cleaning products. The intent was to drive savings by concentration and compacting packaging, through product concentration, bottle size reductions, and packaging reductions. The project was rolled out in 2019 and 2020 and anticipated to reduce plastic use by over 3,000 metric tons, reduce corrugate by over 4,000 metric tons, and reduce water use by over 30Mgals, relative to a stat case sales. Clorox's Cleaning Division also initiated a project to reduce the number of SKUs manufactured at our Home Care plants. This work was started, in part, to simplify production. In mid-2020 the work was accelerated as a result of the COVID 19 pandemic, to meet increased demand for our products. The Home Care teams worked with major customers to streamline the SKUs and produce larger volumes of specific SKUs to meet the increased demand. Wipes, for example, reduced the number of SKU's by over 75%. This work reduced the number of change overs, standardized primary and secondary packaging, and streamlined raw materials needed for production. Another outcome was reduced energy use and greenhouse gas emissions per stat case sold.

A third example occurred within our Kingsford business. The Kingsford plants modified their maintenance schedules to reduce the number and frequency of shut downs. This results in fewer wash downs/less water use and less fuel usage during start up, decreasing emissions. Kingsford plants are also looking at opportunities to recover waste energy by installing waste heat recovery units (WHRU). These cogeneration units would provide additional heat to other equipment, reducing fuel use at our plants.

The compaction product was targeted as an opportunity to increase sales and reduce our plastic and fiber usage. The SKU Project is part of going business activities, but was

accelerated as a result of the COVID 19 pandemic response. Given continued demand and growth opportunities, the Cleaning Division plans to continue to focus on producing more product with fewer overall SKUs. The Kingsford maintenance efficiencies were rolled out in 2018 and is assessed each year, the heat recover project is identified as a potential future project for the business's Ignite Strategy

### **Comment**

This response may contain "forward-looking" statements based on management's current views, beliefs, assumptions and expectations regarding future events and speak only as of the date of this submittal. The company undertakes no obligation to publicly update or revise any "forward-looking" statements, whether as a result of new information, future events or otherwise, except as required by the federal securities laws.

---

### **Identifier**

Opp4

### **Where in the value chain does the opportunity occur?**

Downstream

### **Opportunity type**

Products and services

### **Primary climate-related opportunity driver**

Development of new products or services through R&D and innovation

### **Primary potential financial impact**

Increased revenues through access to new and emerging markets

### **Company-specific description**

The Ignite Strategy is focused on delivering strong economic, environmental and social net positive benefits in a changing world. Each business is tasked with identifying opportunities to reimagining the way they work, addressing global social and environmental issues as a catalyst for change. The business strategic sustainability plans outline their approach toward leveraging our existing portfolio to create new products and services through R&D and Innovation.

The plans provide details on approaches ranging from tech discovery, product transformations, to innovated solutions to reduce their climate related impacts. Each business has identified a sustainability champion, responsible for driving these efforts. The businesses have also assigned employees in R&D specific responsibility for incorporating sustainability initiatives into their work.

### **Time horizon**

Long-term

### **Likelihood**

More likely than not

**Magnitude of impact**

Medium-low

**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**

The total financial impact has not been calculated or is business confidential.

**Cost to realize opportunity**

0

**Strategy to realize opportunity and explanation of cost calculation**

The approach to realize this opportunity is embedded in our Ignite Strategy and ESG Goals. Clorox is enabling each business to become a sustainable business that delivers strong economic, environmental and social net positive benefits in a changing world. This strategy involves establishing Clorox as the pace-setter in building sustainable brands through leadership in Business Transformation, Material Reduction, and Climate Stewardship.

Examples of case studies include Glad working with our major customers to develop a more circular economy around plastic waste. Customer distribution centers are collecting plastic wrap from the tertiary packaging. The company is identifying vendors that can route certain types of plastic back to specific Glad plants, where it can be reprocessed into new products. Household is working on a number of initiatives, including developing compostable Wipes, working with Loop on a refillable container, and developing reusable and refillable models to help achieve circularity in our packaging. Clorox has partnered with design leader Kohler to develop Loop-approved durable packaging for Clorox disinfecting wipes. Following the Loop Model, returned Clorox wipes are sent out for energy recover, and the stainless steel canister is refilled for reuse. Similarly, Glad is working with Loop with recyclable food bags that enables consumers to order the product online and then receive and recycle the food bags through a reusable steel container and return pouch.. Burt's Bees is also working with Loop to offer a facial cleanser in a bottle that is collected and refilled for reuse. The financial impact is not disclosed because the projects are business confidential.

**Comment**

This response may contain "forward-looking" statements based on management's current views, beliefs, assumptions and expectations regarding future events and speak only as of the date of this submittal. The company undertakes no obligation to publicly update or revise any "forward-looking" statements, whether as a result of new

information, future events or otherwise, except as required by the federal securities laws.

---

**Identifier**

Opp5

**Where in the value chain does the opportunity occur?**

Downstream

**Opportunity type**

Resilience

**Primary climate-related opportunity driver**

Other, please specify  
Climate adaptation resilience

**Primary potential financial impact**

Increased revenues resulting from increased demand for products and services

**Company-specific description**

In 2020, when COVID 19 hit, Clorox's businesses experienced an unprecedented demand increase. Clorox had challenges meeting this demand, in part due to challenges with our supply chain. For example, obtaining substrate for Clorox Wipes was increasingly difficult because the existing production facilities in our value chain were not able to ramp up very quickly and other companies were increasing their production, which put additional strains on the supply. Clorox saw similar issues with obtaining primary and secondary packaging as well as limited supplies in other raw materials during the COVID 19 shutdown. As a result of this, Clorox identified supply chain resilience as an opportunity to be addressed. The goal is to ensure the long term viability supply chains associated with changing trends, disruptions, or changing ESG conditions in the market (including social disruptions). We anticipate stronger, more robust supply chains will allow the company to adapt to disruptions associated with changing climatic conditions (acute and chronic), provide the flexibility to adapt to increased demand for new products and services

**Time horizon**

Long-term

**Likelihood**

More likely than not

**Magnitude of impact**

Medium-low

**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**

The financial impact is not disclosed because has not been calculated or is business confidential.

**Cost to realize opportunity**

0

**Strategy to realize opportunity and explanation of cost calculation**

Clorox has initiated a process to evaluate and assess supplier resiliency so that we can meet demand if there is an ESG or climate related disruption to the supply chain. The Sustainability Center Vice President of Operations is working with the Global Strategy Sourcing to ensure the long term viability supply chains associated with changing trends, disruptions, or changing ESG conditions in the market (including social disruptions). This program is in its early stages so a cost to realize the opportunity has not been calculated.

**Comment**

This response may contain “forward-looking” statements based on management’s current views, beliefs, assumptions and expectations regarding future events and speak only as of the date of this submittal. The company undertakes no obligation to publicly update or revise any “forward-looking” statements, whether as a result of new information, future events or otherwise, except as required by the federal securities laws.

## C3. Business Strategy

### C3.1

**(C3.1) Have climate-related risks and opportunities influenced your organization’s strategy and/or financial planning?**

Yes

### C3.1b

**(C3.1b) Does your organization intend to publish a low-carbon transition plan in the next two years?**

Intention to publish a low-carbon transition plan	Comment
---	---------

Row 1	No, we do not intend to publish a low-carbon transition plan in the next two years	This question is considered business confidential
-------	--	---

## C3.2

### (C3.2) Does your organization use climate-related scenario analysis to inform its strategy?

No, but we anticipate using qualitative and/or quantitative analysis in the next two years

### C3.2b

#### (C3.2b) Why does your organization not use climate-related scenario analysis to inform its strategy?

Although climate-related scenario analysis is not fully integrated into our current strategy for identifying climate risks and opportunities, we understand the value of and are transitioning toward using a climate-related scenario analysis tool as a more robust approach to impact assessment and as a lens through which to assess possibly business outcomes that may occur as a result of climate change and the strategic implications of climate related risks and opportunities. Beginning with our FY20 Integrated Annual Report, we are reporting against the Task Force for Climate Related Financial Disclosures (TCFD) framework and plan to incorporate scenario analysis to enhance our processes and disclosures for assessing climate risk and opportunities over time. We conduct plant specific climate related scenarios for our water strategy using the Aqueduct Tool.

Clorox has an ambitious set of ESG leadership goals integrated with our strategic business choices, as part of our integrated long-term corporate strategy called IGNITE. These include a goal to set and achieve science-based targets to reduce greenhouse gas (GHG) emissions in our operations (scope 1 and 2) and across our value chain (scope 3) and a goal to achieve 100% renewable electricity in the US and Canada, the latter by 2021. We joined the CDP Supply Chain and in 2020 we asked our top suppliers representing over 70% of our global spend to report their emissions. We are using this, along with a corporate life-cycle hot spot analysis to calculate our Scope 3 emissions and identify the greatest risks and opportunities within our value chain, enabling us to set science-based targets to reduce greenhouse gas (GHG) emissions. Once the SBTs are set, targeted for CY21, Clorox plans to incorporate climate based scenarios into our long term strategy planning related to our emissions reductions targets. We will also utilize the learnings from our SBT-related Scope 3 assessment to evaluate scenarios which are most applicable to our business circumstances and which will best help to ensure our strategic and financial planning processes are inclusive of all applicable risks and opportunities and ensure resilience of our strategies to climate related scenarios. As our exposure to transitional and physical risks is not considered to be substantial over the next 3-6 years, we foresee this initially being a mostly qualitative analysis that will impact our long term strategy. As we look at the implications of these scenarios, we will prioritize areas of our operations and supply chain with the biggest impact on our environmental footprint, risks and opportunities. Based on our assessment of the various types of scenario analysis, we anticipate implementing a qualitative analysis within the next two years.

### C3.3

**(C3.3) Describe where and how climate-related risks and opportunities have influenced your strategy.**

	Have climate-related risks and opportunities influenced your strategy in this area?	Description of influence
Products and services	Yes	<p>Our risk process identifies climate-related risks and revenue growth opportunities associated with new product innovation, including a strategy to develop more sustainable products, which reduce water use and carbon emissions at the consumer use phase. Our business specific strategies are focused on the medium and long term horizons, depending on the goal period (e.g. 2025 or 2030), with early work is being implemented in the short term. One example of a substantial strategic decision to minimize a climate based risk and create cost savings is the compacting of our liquid bleach products and formulating cold water rinse formulations, requiring less water and energy usage per dose. This innovation to compact the products by at least 13% was completed in 2020, reducing our footprint per stat case sold since more concentrated product uses less water used, has more efficient distribution, and reduces our plastic and fiber packaging materials compared to the prior product. The concentrated Clorox bleach will reduce the lifecycle footprint of this product (raw materials, manufacture, retail, consumption and end of life) by reducing energy. This type of an approach may be of critical importance in areas of high water risk. From the consumer standpoint, the end product is a more convenient product that is also better for the environment, helping them to adopt a more sustainable lifestyle. It helps reduce the consumer’s carbon footprint associated with the manufacture and use of the product, as well as reduces the amount waste when the product is consumed and when the packaging is discarded.</p> <p>As a result of our management methods and our deforestation risk related to our fiber and palm-derived ingredients is minimal and we have not experienced any negative reputational impacts related to our forest commodities. Our GSS Responsible Sourcing Team has implemented a strategy to dedicate additional resources to increase procurement of RSPO certified palm and work with</p>

		<p>external partners to reduce the risk associated with palm suppliers, including improved tracing and auditing. Strategically, as we look at increasing the PCR content of our resin based packaging to meet our Ignite Goals, we are taking steps to assure supply in the event of shortage of PCR resin as future supply has been identified as a risk.</p>
<p>Supply chain and/or value chain</p>	<p>Yes</p>	<p>For our supply chain and value chain, increases in extreme weather can cause supply chain impacts. We assess vulnerable regions in our supply chain and the impact of weather and environmental events can have on the cost and availability of raw materials, the continuity of logistics as well as the safety and security of operations in those areas as it relates to weather impact. We have contingency plans in place to minimize the effects of weather on our supply chain.</p> <p>A case study example that had a substantial impact was when Hurricanes Harvey and Irma hit in August and September 2017. Bleach production was reduced because two plants were shut down for a short period and the supply chain was disrupted. We also saw an increase in sales across multiple business during the week prior to and after the storm. Clorox was able to ramp up production at other plants, ensure their supply chains were not affected, and relocate inventory from other areas to meet the increased demand. We saw a similar increases in demand when Hurricane Irma hit in September 2017. As a direct result of learnings during Hurricanes Harvey and Irma, we have further improved contingency plans to ensure both work in process and finished goods inventories are adequate leading into hurricane season. In addition, we incorporated natural disaster scenarios in our contingency planning into our supply planning and forecasting process. Similarly, as a result of increased demand and pressures on our supply chain from the COVID 19 pandemic, we initiated efforts to evaluate and address our Supply Chain resiliency to mitigate future risks of this nature.</p> <p>Our contingency planning associated with climate related weather impacts is focused on the short term horizon whereas our Supply Chain resiliency planning will focus on short and medium term horizons. We consider climate related risks and opportunities of high importance in the analysis of our supply/value chain.</p>

Investment in R&D	Yes	<p>Climate related opportunities related to the innovation of sustainable products and packaging have been identified by R&amp;D, who maintains a strategic pipeline of projects which have sustainable improvements. Our R&amp;D function has teams dedicated to new product discovery and innovation and sustainability is a key driver of their innovation strategy. As a result over half of our product portfolio has had a sustainable product or packaging improvement over the last 8 years.</p> <p>Our R&amp;D resources help us to mitigate the risks associated with higher operational costs as a result of increased consumer preferences for sustainable products. Increased investments in R&amp;D help to fund innovation which contributes to continued improvements in the environmental footprints of our products and packaging, while also working to maximize our PCR content and packaging recyclability. For example, R&amp;D innovation enabled us to eliminate the vast majority of PVC packaging in our global portfolio in recent years. Each Business also has a strategic sustainability plan which includes R&amp;D investments in areas such as technology discovery, Life Cycle Analysis studies, and product innovation.</p> <p>Our Global R&amp;D program implemented a new EcoChampion role for certain R&amp;D personnel. It is allocated as a percentage of Full Time Employee's weekly work. The EcoChampions are tasked with driving sustainability throughout the R&amp;D organization. EcoChampions representing each BU and R&amp;D support function are charged with overseeing a collaborative approach across Global R&amp;D on various activities, including identifying and developing tools and resources to enable our Ignite Sustainability Goals and reduce our Climate impacts. The role is charged with sharing ideas, initiatives, tech discovery, and pilot studies for our Ignite strategy.</p>
Operations	Yes	<p>Consideration our operations regarding climate risks is important, in part, due to disruptions from chronic and acute extreme weather events. We have a Business Continuity Team tasked with planning for disruptions at Clorox operations that might be impacted by Climate related disruptions. We try to ensure that our business continuity strategies and plans address supply and operational continuity such as redundancy in our supply chain and manufacturing operations. For example, certain facilities</p>

		<p>have plans to shift water sources over the short and medium term horizons if current supplies become limited. Plants in areas that are vulnerable to climate impacts have strategies to address these risks in the short term through their Business Continuity plans.</p> <p>Operational opportunities related to Climate involve efficiency improvements in our energy usage and investment in renewable energy. Since 2012, as part of our public goals to reduce energy and greenhouse gas emissions by 20% per case of product sold, we have reduced energy by 18% and GHG emissions by 33% when we closed out our goal period. We met these long term horizon targets in 2019. In 2019, we reset our global footprint baseline for Energy, Greenhouse Gasses, Water, and Waste to calendar year 2018. In 2020 our Operations achieved a 15% reduction in Energy, an 11% reduction in GHG on a production basis (per stat case) relative to the 2018 baseline.</p> <p>We have been able to improve the energy efficiency of our operations as we strive to meet our climate related goals. For example, as part of our strategy to reduce emissions and minimize carbon related impacts, we have ongoing efforts to install more energy efficient lighting at our manufacturing and distribution facilities. Several plants also replaced energy intensive equipment with more energy efficient options. We seek to increase the use of renewable energy in our operations in support of our goal of 100% renewable electricity in US and Canada. In 2019, we signed a 12-year, 70-megawatt virtual power purchase agreement (VPPA) for the purchase of renewable electricity beginning in 2021.</p> <p>We continue to ensure our operations have strategies to manage their footprint responsibly, while seeking further efficiency gains, helping to offset increased consumption from business growth.</p>
--	--	---

### C3.4

**(C3.4) Describe where and how climate-related risks and opportunities have influenced your financial planning.**

Financial planning elements that have been influenced	Description of influence

<p>Row 1</p>	<p>Revenues Direct costs Indirect costs Capital expenditures Acquisitions and divestments Assets</p>	<p>Climate related risks and opportunities are at the forefront of our decision making processes, including financial planning, to ensure that Clorox remains a leader in corporate responsibility while maintaining Purpose Driven Growth. Clorox has an ambitious set of ESG leadership goals integrated with our strategic business choices, as part of our integrated long-term corporate strategy called IGNITE, including Planet goals with a focus on plastic and waste reduction and science-based climate action. Our IGNITE ESG priorities with our business priorities, furthering our vision of earning people’s enduring loyalty and creating long-term value for all stakeholders. For example:</p> <p>1) Revenues: Our financial planning process has integrated our business objectives with our ESG objectives, including our climate based objectives. There is the potential for positive brand value influence and increased sales due to sustainable product innovation and as a result of making sustainable improvements to our products that resonate with our customers and consumers. This increased desire for products that are sustainably sourced and sustainably made may have a high impact on our revenues. This is evident with over 58% of our sales from products which have had sustainable improvements during our 2020 goal period and brands with major sustainable innovations grow at a faster rate than those without major sustainable improvements. We evaluate the revenue impact of these risks and opportunities on a project by project basis as part of our financial planning process for the medium and long term horizons.</p> <p>2) Direct and Indirect Operating Costs: Each businesses assess the impact of obtaining sustainability sourced or recycled materials for our products and packaging. The risks, including financial risks, and the opportunities, including increased sales and reduced footprints, are accounted for in each operations short (1-3 year) and medium term (3-6 year) plans. Efforts to increase the PCR content of our resin based packaging require us to taking steps to plan financially to design, manufacture, and assure supply of PCR resin. There is a Low to Medium Impact to our direct and indirect operating costs related to the increased use of PCR Resin. The cost of PCR resin and certified palm ingredients is factored into our procurement budget financial planning each year. We anticipate increased operating costs, including PCR resin and certified palm ingredients, will occur in the next 10 years as Clorox and other companies work toward increasing the PCR content of our packaging. Climate Change related to the potential increase in severity of extreme weather events has a Low Impact Operating Budget for the cost of alternate raw material supplies, and the cost of inventory pre-build and storage.</p> <p>3) Capital Expenditures/Budget: Financial planning for investment in</p>
------------------	--	---

		<p>manufacturing equipment to process and package products which contribute to lower emissions and a reduced environmental footprint has a low to medium impact on our Capital Allocation and Budget over the long term or next 5 to 10 years, as our current manufacturing capabilities may not support the processing or packaging of these innovations. Incorporating PCR into our Glad bags, for example, will have a low to medium impact on the business specific capital budget. Our Capital Planning incorporates processes to identify sustainability impacts (energy, water, emissions, and waste) for all projects, not just projects focused on sustainability gains. There is also a Low Impact to our Capital Budget as we plan for upgrades to lighting and equipment such as boilers and chillers that potentially reduce our energy and water footprints, these projects often proceed at the plant level. We anticipate increased capital budget for securing additional production for our Ignite goals as well as for warehouse storage capacity over the next 10 to 15 years associated with increased frequency of climate related weather events.</p> <p>4) Acquisitions and Divestments: Our current risk assessment process includes evaluating current risks or opportunities related to acquisitions or divestments and included in our financial planning process where applicable. A member of our Global Safety and Environmental team are included in acquisition and divestment process and advice on environmental issues. Our current risk assessment process has not identified any current risks or opportunities related to acquisitions or divestments but they are evaluated financially on a project/opportunity basis.</p> <p>5) Our current risk assessment process has not identified any current risks or opportunities related to access to capital or to our current Assets and Liabilities. We work with our network of global insurance providers, who insure our facilities and equipment assets to ensure we understand and manage the risks associated and ensure that our risk mitigation and contingency plans are robust, including risks associated with Climate Change. Our Business Continuity Team identifies risks around potential disruptions of plant operations (e.g. major assets) and works with other teams to develop plans to address those risks. The cost associated with insuring our assets and managing our mitigation and contingency plans are included in our operating budget.</p>
--	--	---

### C3.4a

**(C3.4a) Provide any additional information on how climate-related risks and opportunities have influenced your strategy and financial planning (optional).**

Clorox is committed to doing its part to help address the impact that rising GHG emissions have on climate change and the environment. Reducing environmental risks with a specific focus on climate change reduces future costs and ultimately provides permission to continue to do business, while our environmental footprint reduction initiatives serve corporate cost savings goals, and sustainable product growth initiatives serve Clorox's objective to accelerate top line sales revenue growth. Climate related risks and opportunities are at the forefront of our business objectives and strategies to ensure that Clorox remains a leader in corporate responsibility while maintaining Purpose Driven Growth.

Clorox has an ambitious set ESG leadership goals integrated with our strategic business choices, as part of our integrated long-term corporate strategy called IGNITE. Our IGNITE ESG Goals integrate environmental, social and governance priorities with our business priorities, furthering our vision of earning people's enduring loyalty and creating long-term value for all stakeholders. As we work towards setting a SBT with the Science-based Target Initiative, Clorox continues to be committed to the principles established as part of our 2020 goals. In 2019, we reset our global footprint baseline for Energy, Greenhouse Gasses, Water, and Waste to calendar year 2018. We continue to ensure all our facilities are managing their water use responsibly, while seeking further efficiency gains and other opportunities to reduce their overall sustainability helping to offset and mitigate the effects of increased consumption due to business growth.

Examples of linkages:

Clorox manufacturing facilities have goals or initiatives to reduce their greenhouse gas emissions, energy and water use, and solid waste to landfill. We've embedded sustainability criteria into our core procurement processes, including our Business Partner Code of Conduct and supplier selection process. In 2020 we published our Environmental Policy, which outlines our principals toward environmental stewardship and sustainability. These principals include Board and Senior Management accountability, further integrating environmental sustainability into the company's strategies and business decisions, reinforcing expectations for environmental stewardship to our business partners, engaging with our supply chain partners to reduce our greenhouse emissions, and advancing climate stewardship to mitigate climate-related risk.

Historically, we used a supplier scorecard to track and measure the transparency and sustainability of our Top 100 suppliers (representing 2/3 of supplier spending). In 2019 we joined CDP supply chain and have engaged our top suppliers on reporting and reducing their emissions (>70% by spend). We're embedding eco criteria into product and package design processes and integrating sustainability goals into our Business Unit and R&D strategies to improve the sustainability of newly designed and redesigned products and packaging. To do this, Clorox views each business, at each stage of a product's life cycle, through an environmental sustainability lens in order to gain a deeper understanding of their GHG and overall environmental impact and to identify opportunities to reduce this impact. Our sustainability strategy has enabled us to support environmentally friendly product lines such as our Burt's Bees line of natural personal care products and our Brita water filtration systems that help eliminate bottled water waste. We also continue to review our enterprise risk management program and processes to identify, assess and prioritize business risks and update our mitigation and contingency plans accordingly.

We consider various aspects of climate change in relation to our business strategy around reducing our emissions, pursuing renewable energy investments and reducing the

environmental footprint of our products. In addition, understanding the need for preventing a catastrophic increase in global temperature has also been incorporated into our business strategy. The physical risks of climate change have influenced our strategy by ensuring that our strategy includes a focus on climate resilience to prevent and mitigate disruption in our operations due to increased severity of extreme weather conditions. For example, we implement a robust enterprise risk management program to ensure continuity of supply of raw materials and business readiness in the event of manufacturing or logistics disruption associated with a significant climatic event.

Transitional risks associated with the transition to a low carbon economy such as climate related regulatory and policy changes have influenced our strategy to continue to focus on energy efficiency in our operations and to increase our investment in renewable energy to minimize the potential impact of carbon taxes. Other transitional aspects of climate change include the shift in consumer preferences towards lower emission products which fuels our innovation strategy related to minimizing the environmental footprint of our products. The need to prevent a catastrophic global temperature increase has influenced our strategy to understand how a well below 2 degree or 1.5 degree strategy might impact our long term goals.

Our short term and long term strategy has been influenced by consumer-driven opportunities as well as physical and transitional risks. Physical risks have impacted our strategy around ensuring business continuity plans are robust to respond to severe weather impacts. Our Ignite Strategy to integrate our ESG leadership goals our strategic business choices has been influenced by consumer driven opportunities. Our commitment to reduce both energy consumption and water use has been driven by both regulatory risk related to climate change and the desire to minimize our overall environmental footprint.

## C4. Targets and performance

### C4.1

**(C4.1) Did you have an emissions target that was active in the reporting year?**

Intensity target

### C4.1b

**(C4.1b) Provide details of your emissions intensity target(s) and progress made against those target(s).**

---

**Target reference number**

Int 1

**Year target was set**

2012

**Target coverage**

Company-wide

**Scope(s) (or Scope 3 category)**

Scope 1+2 (location-based) +3 (upstream)

**Intensity metric**

Metric tons CO<sub>2</sub>e per unit of production

**Base year**

2011

**Intensity figure in base year (metric tons CO<sub>2</sub>e per unit of activity)**

1.68

**% of total base year emissions in selected Scope(s) (or Scope 3 category) covered by this intensity figure**

100

**Target year**

2020

**Targeted reduction from base year (%)**

20

**Intensity figure in target year (metric tons CO<sub>2</sub>e per unit of activity) [auto-calculated]**

1.344

**% change anticipated in absolute Scope 1+2 emissions**

20

**% change anticipated in absolute Scope 3 emissions**

20

**Intensity figure in reporting year (metric tons CO<sub>2</sub>e per unit of activity)**

1.01

**% of target achieved [auto-calculated]**

199.4047619048

**Target status in reporting year**

Achieved

**Is this a science-based target?**

No, but we anticipate setting one in the next 2 years

**Target ambition**

**Please explain (including target coverage)**

In 2012, we set a target to reduce our GHG emissions (intensity – per case of product sold) by 20% from 2012 to 2020 (with 2011 = baseline year). As of 2018, we met our target two years early, reducing our GHG emissions by 33% (intensity – per case of

product sold) and exceeded our goal by 13 percentage points. In addition to achieving an intensity based reduction of 33% vs baseline year, we have also achieved an absolute reduction of 25% (absolute reduction not tied a goal).

In 2019, we closed out our 2020 goal period and committed to setting a SBT with the Science-based Target Initiative. While we are working on our SBT, we have reset our global footprint baseline to calendar year 2018 for interim tracking purposes. For this response, we are reporting 2020 results versus our original 2020 reduction target of 20% per case of product sold versus a 2011 baseline. In 2020 we reduced our GHG footprint by 11% on an intensity basis relative to 2018, although we did have an increase in our absolute emissions of 6% associated with an increase in production in response to COVID 19.

The target coverage increased to include two new locations in the Middle East where Clorox obtained majority ownership with operational control in 2020. For this response, we have not adjusted our CY2011 baseline from our prior 2020 goal period to reflect this change to our business, but we have adjusted our most recent CY2018 baseline to measure performance in our new 2030 goal period. We continue to ensure all our facilities are managing their footprints responsibly, while seeking further efficiency gains and other opportunities to reduce their overall sustainability helping to offset and mitigate the effects of increased consumption due to business growth.

## C4.2

**(C4.2) Did you have any other climate-related targets that were active in the reporting year?**

Target(s) to increase low-carbon energy consumption or production  
Other climate-related target(s)

## C4.2a

**(C4.2a) Provide details of your target(s) to increase low-carbon energy consumption or production.**

---

**Target reference number**

Low 1

**Year target was set**

2019

**Target coverage**

Country/region

**Target type: absolute or intensity**

Absolute

**Target type: energy carrier**

Electricity

**Target type: activity**

Consumption

**Target type: energy source**

Renewable energy source(s) only

**Metric (target numerator if reporting an intensity target)**

Percentage

**Target denominator (intensity targets only)**

**Base year**

2018

**Figure or percentage in base year**

0

**Target year**

2025

**Figure or percentage in target year**

100

**Figure or percentage in reporting year**

0

**% of target achieved [auto-calculated]**

0

**Target status in reporting year**

Underway

**Is this target part of an emissions target?**

Sourcing renewable electricity is part of our Ignite Climate strategy to achieve science based targets to reduce GHG Scope 1 and 2, emissions. We anticipate that the renewable electricity goal will contribute to our SBTs, once they are developed. To help us meet this commitment, we joined the CDP Supply Chain in 2019 and have asked our top suppliers representing >70% of our global spend to report their emissions. In 2020 we contracted with a third party to calculate our Scope 3 emissions, enabling us to set Science-based targets to reduce greenhouse gas (GHG) emissions, targeted for approval in Calendar Year 2021.

**Is this target part of an overarching initiative?**

Other, please specify

This target is part of our Sustainability Leadership Goals, including to reduce our GHG emissions.

**Please explain (including target coverage)**

Climate related risks and opportunities are at the forefront of our decision making processes to ensure that Clorox remains a leader in corporate responsibility. Clorox has an ambitious set of ESG leadership goals integrated with our strategic business choices, as part of its long-term corporate strategy called Ignite. These ESG goals include 100% renewable electricity in the US and Canada in 2021 and setting and achieving science based targets to reduce GHG in our operations (Scope 1 and 2) and across our value chain (Scope 3).

The renewable electricity target covers our anticipated electric consumption for all facilities in the US and Canada where we have operational control (Plants, Distribution Centers, R&D Centers, and large offices). The 2020 target coverage was adjusted to include two new locations in the Middle East where Clorox obtained majority ownership with operational control in 2020.

The electricity consumption will be based on calendar year 2021 consumption and annual consumption thereafter as we sustain this goal over time. We signed a 12-year, 70-megawatt virtual power purchase agreement (VPPA) for the purchase of renewable electricity beginning in 2021. This VPPA will allow us to meet about half of our 100% renewable electricity goal for the U.S. and Canada. We purchased unbundled RECs to cover the remainder of our electricity consumption to meet this goal in 2021, four years earlier than our original plan

**C4.2b**

**(C4.2b) Provide details of any other climate-related targets, including methane reduction targets.**

---

**Target reference number**

Oth 1

**Year target was set**

2012

**Target coverage**

Company-wide

**Target type: absolute or intensity**

Intensity

**Target type: category & Metric (target numerator if reporting an intensity target)**

Energy consumption or efficiency

MWh

**Target denominator (intensity targets only)**

Other, please specify

Per 1000 cases of product sold

**Base year**

2011

**Figure or percentage in base year**

1.7

**Target year**

2020

**Figure or percentage in target year**

1.36

**Figure or percentage in reporting year**

1.23

**% of target achieved [auto-calculated]**

138.2352941176

**Target status in reporting year**

**Is this target part of an emissions target?**

No

**Is this target part of an overarching initiative?**

No, it's not part of an overarching initiative

**Please explain (including target coverage)**

In 2012, we set a target to reduce our energy consumption (intensity – per case of product sold) by 20% from 2012 to 2020 (with 2011 = baseline year). As of 2018, we closed out our goal period having reduced our energy emissions by 18% (intensity – per case of product sold) anticipating at least a 1% gain each year through 2020. In addition, we have achieved an absolute reduction of 7% vs baseline year (absolute reduction not part of a goal).

In 2019, we closed out our 2020 goal period and committed to setting a SBT with the Science-based Target Initiative. While we are working on our SBT, we have reset our global footprint baseline to calendar year 2018 through our next goal period. For this response, however, we are reporting 2019 results versus our original 2020 reduction target of 20% per case of product sold versus a 2011 baseline. In 2019 we reduced our Energy footprint by 8% on an absolute basis and 6% on an intensity basis relative to 2018 (e.g. a 1.31 KPI or 107% improvement since 2011). We continue to ensure all our facilities are managing their water use responsibly, while seeking further efficiency gains and other opportunities to reduce their overall sustainability helping to offset and mitigate the effects of increased consumption due to business growth.

---

**Target reference number**

Oth 2

**Year target was set**

2019

**Target coverage**

Company-wide

**Target type: absolute or intensity**

Absolute

**Target type: category & Metric (target numerator if reporting an intensity target)**

Waste management

Percentage of sites operating at zero-waste to landfill

**Target denominator (intensity targets only)**

**Base year**

2018

**Figure or percentage in base year**

18

**Target year**

2030

**Figure or percentage in target year**

100

**Figure or percentage in reporting year**

33

**% of target achieved [auto-calculated]**

18.2926829268

**Target status in reporting year**

Underway

**Is this target part of an emissions target?**

No, it is part of our IGNITE Sustainability Leadership Goals.

**Is this target part of an overarching initiative?**

Other, please specify

It is part of our IGNITE Sustainability Leadership Goals.

**Please explain (including target coverage)**

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 Purpose Driven Growth. Clorox has an ambitious set of ESG leadership

goals integrated with our strategic business choices, as part of our long-term corporate strategy called Ignite. These ESG goals include 100% global facilities zero-waste-to-landfill by 2030 (plants by 2025).

The target year, baseline, and current year cover all facilities where we have operational control of the waste streams (Plants, Distribution Facilities, R&D, large offices) where infrastructure allows as of 2020. .

Our ZWtLF facilities are expected to meet the principals and definitions outlined in UL Standard 2799, Zero Waste to Landfill. Our ZWtLF criteria include: 1) having a Zero Waste approach to minimizing all waste streams; 2) Processes to Reduce/Reuse/Recycle/Compost/or send to Energy Recovery (WtE) with no waste sent directly to landfill, and 3) passes a Corporate Audit. The target applies to waste that the facility has direct operational control over and excludes locations or waste streams where the infrastructure doesn't allow zero waste to landfill (e.g. waste is required by regulation or local ordinance to go to a specific destination or there is no viable waste to energy or thermal recovery facility outlet).

---

**Target reference number**

Oth 3

**Year target was set**

2019

**Target coverage**

Product level

**Target type: absolute or intensity**

Intensity

**Target type: category & Metric (target numerator if reporting an intensity target)**

Resource consumption or efficiency

Other, please specify

50 percent combined reduction of virgin fiber and plastic packaging

**Target denominator (intensity targets only)**

Other, please specify

lbs per case of product sold

**Base year**

2018

**Figure or percentage in base year**

0.75

**Target year**

2030

**Figure or percentage in target year**

0.38

**Figure or percentage in reporting year**

0.67

**% of target achieved [auto-calculated]**

21.6216216216

**Target status in reporting year**

Underway

**Is this target part of an emissions target?**

No, it is part of our IGNITE Sustainability Leadership Goals but is expected to contribute to meeting our planned SBTs.

**Is this target part of an overarching initiative?**

Other, please specify

It is part of our IGNITE Sustainability Leadership Goals

**Please explain (including target coverage)**

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 Purpose Driven Growth. Clorox has an ambitious set of 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.

In 2018 we calculated that our packaging had 0.75 pounds of plastic or fiber per stat case sold. In 2020, we reduced the volume of plastic or fiber in our packaging to 0.67 pounds per stat case sold. This was achieved through by reducing our primary and secondary fiber packaging volumes, compacting our bleach products, and other light-weighting efforts.

The coverage target includes all plastic and fiber packaging that we purchase for our operationally controlled manufacturing facilities globally, as well as plastic and fiber packaging purchased by contract manufacturers for our domestic businesses. Due to data limitations it excludes packaging purchased by contract manufacturers for our international operations. Our 50% reduction target is an intensity target measured per case of product sold versus a 2018 base year. This goal helps reduce our overall GHG emissions through a combination of reduced packaging volume and increased recycled content in our packaging.

---

**Target reference number**

Oth 4

**Year target was set**

2019

**Target coverage**

Product level

**Target type: absolute or intensity**

Intensity

**Target type: category & Metric (target numerator if reporting an intensity target)**

Resource consumption or efficiency  
Percentage of plastic from recycled sources

**Target denominator (intensity targets only)**

Other, please specify  
percent of lbs of plastic

**Base year**

2018

**Figure or percentage in base year**

11

**Target year**

2030

**Figure or percentage in target year**

22

**Figure or percentage in reporting year**

11

**% of target achieved [auto-calculated]**

0

**Target status in reporting year**

Underway

**Is this target part of an emissions target?**

No, it is part of our IGNITE Sustainability Leadership Goals, but it is expected to contribute to our planned SBTs.

**Is this target part of an overarching initiative?**

No, it's not part of an overarching initiative

**Please explain (including target coverage)**

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 Purpose Driven Growth. Clorox has an ambitious set of ESG leadership goals integrated with our strategic business choices, as part of its long-term corporate strategy called Ignite. These ESG goals include doubling our post-consumer recycled plastic in our packaging by 2030 (50% increase by 2025) versus a 2018 base year.

The coverage target includes all plastic packaging that we purchase for our operationally controlled manufacturing facilities globally, as well as plastic packaging purchased by contract manufacturers for our domestic businesses. Due to data limitations it excludes packaging purchased by contract manufacturers for our international operations. In 2020 we were able to maintain the same percentages as the base year with significantly increased volumes. This goal helps reduce our overall GHG emissions through an increased recycled content in our packaging and encourages a circular economy through increased demand for PCR plastic.

---

**Target reference number**

Oth 5

**Year target was set**

2019

**Target coverage**

Product level

**Target type: absolute or intensity**

Intensity

**Target type: category & Metric (target numerator if reporting an intensity target)**

Resource consumption or efficiency

Other, please specify

100% Reusable/Recyclable/Compostable packaging by 2025

**Target denominator (intensity targets only)**

Other, please specify

Percent of lbs sold

**Base year**

2018

**Figure or percentage in base year**

74

**Target year**

2025

**Figure or percentage in target year**

100

**Figure or percentage in reporting year**

76

**% of target achieved [auto-calculated]**

7.6923076923

**Target status in reporting year**

Underway

**Is this target part of an emissions target?**

No, it is part of our IGNITE Sustainability Leadership Goals, but it is expected to contribute to reducing emissions from the lifecycle of our products.

**Is this target part of an overarching initiative?**

Other, please specify

It is part of our IGNITE Sustainability Leadership Goals

**Please explain (including target coverage)**

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 Purpose Driven Growth. Clorox has an ambitious set of 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 (consumer-facing) packaging that we purchase for our operationally controlled manufacturing facilities globally, as well as primary packaging purchased by contract manufacturers for our domestic businesses. Due to data limitations it excludes primary packaging purchased by contract manufacturers for our international operations. In 2020 we were able to increase the percent of packaging that is reusable, recyclable, or compostable versus our 2018 baseline. This goal encourages a circular economy by helping to increase the amount of packaging available for reuse/recycling and contributes to fewer GHG emissions associated single-use packaging and landfilling.

**C4.3**

**(C4.3) Did you have emissions reduction initiatives that were active within the reporting year? Note that this can include those in the planning and/or implementation phases.**

Yes

**C4.3a**

**(C4.3a) Identify the total number of initiatives at each stage of development, and for those in the implementation stages, the estimated CO2e savings.**

	Number of initiatives	Total estimated annual CO2e savings in metric tonnes CO2e (only for rows marked *)
Under investigation	3	415
To be implemented*	5	2,632
Implementation commenced*	5	1,420

Implemented*	7	11,165
Not to be implemented	6	7,673

### C4.3b

**(C4.3b) Provide details on the initiatives implemented in the reporting year in the table below.**

**Initiative category & Initiative type**

Energy efficiency in buildings  
Lighting

**Estimated annual CO2e savings (metric tonnes CO2e)**

2,884

**Scope(s)**

Scope 2 (location-based)

**Voluntary/Mandatory**

Voluntary

**Annual monetary savings (unit currency – as specified in C0.4)**

100,000

**Investment required (unit currency – as specified in C0.4)**

1,000,000

**Payback period**

4-10 years

**Estimated lifetime of the initiative**

6-10 years

**Comment**

We continued efforts to replace current lighting with more efficient LED lighting at various manufacturing and distribution sites in the United States and Latin America as a result of projects implemented as part of our company-wide energy audit. In addition, our Engineering Standards were updated so that all new or replacement lighting must be LED. Annual monetary savings are around \$10 to >50K/yr depending on the location (conservatively reported as \$100,000.) In 2020 we upgraded the lighting at three Regional Distribution Centers and several plants. Individual projects estimate around \$50-600K/yr depending on the size of the project (conservatively estimated as\$1,000,000).

Implementation has commenced on 5 projects that will achieve approximately 1,000 MTCO2e in savings and implementation has been completed on 4 projects that saved 1,884 MTCO2e for an annual average is estimated at 2,884 MTCO2e.

---

**Initiative category & Initiative type**

Low-carbon energy consumption  
Other, please specify  
Purchase of Carbon Offsets

**Estimated annual CO2e savings (metric tonnes CO2e)**

9,146

**Scope(s)**

Scope 1  
Scope 2 (location-based)  
Scope 3

**Voluntary/Mandatory**

Voluntary

**Annual monetary savings (unit currency – as specified in C0.4)**

0

**Investment required (unit currency – as specified in C0.4)**

39,000

**Payback period**

No payback

**Estimated lifetime of the initiative**

1-2 years

**Comment**

In 2020, Burt's Bees Natural Personal Care Products, a Clorox division, offset their Scope 1, 2 and 3 GHG emissions by the purchase of Carbon Offsets. These offsets are in the form of purchased verified emissions reductions was implemented. We do not anticipate any monetary savings from this.

---

**Initiative category & Initiative type**

Energy efficiency in production processes  
Compressed air

**Estimated annual CO2e savings (metric tonnes CO2e)**

135

**Scope(s)**

Scope 2 (location-based)

**Voluntary/Mandatory**

Voluntary

**Annual monetary savings (unit currency – as specified in C0.4)**

6,000

**Investment required (unit currency – as specified in C0.4)**

0

**Payback period**

4-10 years

**Estimated lifetime of the initiative**

6-10 years

**Comment**

As part of our energy efficiency efforts, we installed new, more energy efficient air compressors at our Atlanta West Plant. We are also planning to install a new air compressor at our Orangeville plant in 2021. We are investigating a new project to either optimize, replace, or add a more energy efficient air compressor at our Atlanta Main, GA plant. This project was implemented. We are not disclosing the investment, since it was part of a larger project that is business confidential

---

**Initiative category & Initiative type**

Energy efficiency in production processes  
Process optimization

**Estimated annual CO2e savings (metric tonnes CO2e)**

420

**Scope(s)**

Scope 1

**Voluntary/Mandatory**

Voluntary

**Annual monetary savings (unit currency – as specified in C0.4)**

1,700,000

**Investment required (unit currency – as specified in C0.4)**

0

**Payback period**

4-10 years

**Estimated lifetime of the initiative**

6-10 years

**Comment**

One of our Kingsford plants is purchasing and installing an automated process for char. The system moves the wood chips more efficiently, replacing process of the operating

and maintaining bull dozers. Implementation has commenced on this project, which is anticipated to save reduce fuel consumption by 80,000 gallons annually and save approximately 420 MTCO<sub>2</sub>e in emissions. The site anticipates installing the system and operate the system in late 2021 or 2022. Investment, payback, and lifetime for this project are business confidential.

As part of the project implementation the plant was able to send 150 dump truck loads of fill material out for to alternate uses, over 90% of the excavated volume. 75 loads went to help the Burnside City fill up a large area they are developing for parking. Another 75 loads have gone to a local landowner looking to fill areas on his property. The project anticipates an additional 50 loads will be moved to either location.

### C4.3c

**(C4.3c) What methods do you use to drive investment in emissions reduction activities?**

Method	Comment
Compliance with regulatory requirements/standards	These investments are budgeted as part of the company’s annual capital and expense budgeting processes. For example, the cost to manage regulatory requirements associated with the Title V air permits held by our Kingsford charcoal manufacturing sites is included in our annual budget. Over the last few years our Kingsford plants have updated their maintenance procedures to reduce their shut down/start up times, which impact their emissions. The plants adjust their capital investments in order to plan for more extended run times. As part of this effort, the Kingsford plants have also invested in more automated technologies to produce a more stable and consistent product. This results in more stable emissions when complying with emissions standards.
Dedicated budget for other emissions reduction activities	These investments are budgeted as part of the company’s annual capital and expense budgeting processes. This budget funds engineering projects for energy savings and efficiency such as our lighting upgrade projects conducted in 2019, upgrading boilers and installing a wood-pile cover at our Summer Shade, KY Kingsford site to reduce the amount of energy and subsequent emissions related to drying the wood used in our charcoal products. In 2020 our Engineering team added Sustainability Scoping and Alignment to their capital management process. New capital projects have to identify if the project contributes to one of the company’s Ignite goals, the applicable sustainability gains (e.g. water, energy, waste, or emissions) as part of the alignment for project review and approval during the planning stage. The capital planning process identifying the costs related to any sustainability gains. The project team must also document how the project will manage waste and recycling during the

	<p>execution phase, including actions to meet the company's Zero Waste criteria.</p> <p>For example, in 2020 during an expansion of our wipes plant the team implemented this process and reduced CO2e emissions through remote bidding, eliminated over 1,000 lbs of foam padding in the new equipment, set up a process to return skids to the manufacture, saving over 80,000 lbs of wood, and recycled over 3,000 lbs of metal and 250,000 lbs of wood dunnage.</p>
Employee engagement	<p>The voluntary employee based eco network group, The Eco Warriors, exists at sites throughout the company, at both office and manufacturing locations. The Eco Warriors network focuses on making Clorox's workplace more sustainable. This also includes the company's current waste reduction campaign and efforts to meet our ZWtL Criteria at all of our operations by 2030 (plants by 2025). With the help of actively engaging our Eco-Warriors to promote sustainable practices at their locations, at the end of 2020 we had 18 zero waste to landfill sites, representing 31% of our global facilities.</p> <p>In 2019 the Eco Warriors at one of our offices established best practices for achieving ZWtLF status in our office locations. The Eco-Warrior teams at over a dozen of our plants sponsored remote and onsite sustainability awareness activities during Earth Day this year, examples included Climate change workshops, environmental awareness videos, creating a green wall, sculpture contests using recycled materials, and give a ways. The site Eco-Warrior Teams also help educate employees on our environmental footprint goals and through which employees submit their own ideas on how we can make sustainable product improvements and minimize our energy, GHG, waste water footprints, and ZWtLF. These ideas are reviewed by functional leadership across the organization. With continued engagement, we continue to reduce our energy, GHG emissions, waste to landfill and water usage (all on a per case of product sold basis).</p>
Internal incentives/recognition programs	<p>Incentives: In 2019 we added an Ignite Goal for ESG Governance, which establishes that Executive compensation awards will be tied to elements of our ESG goals for members of the Clorox executive committee, including for the chair and CEO. Clorox also established a Sustainability Center, responsible for driving the company's corporate environmental priorities and enabling business units and functions as they more deeply integrate sustainability into their own strategies.</p> <p>Clorox's broader sustainability effort includes key members from each business Leadership Team, subject matter experts across a wide range of functions all tasked with addressing various aspects of monitoring/measuring and reducing our climate related impacts while also driving Purpose Driven Growth. This broader team has incentives built into their performance goals for achieving our sustainability</p>

	<p>initiatives.</p> <p>Business unit leadership team are incentivized for achieving their strategic sustainability plans for its portfolio of brands and their part helping to help deliver corporate ESG goals.</p> <p>Members of the all-voluntary Eco Warriors network are recognized for their voluntary participation in helping the company make sustainable decisions and choices in protecting the environment. Their contributions are recognized as part of our annual performance management process.</p> <p>The company also has a recognition program called Bravo. The program, allows for peer-to-peer and manager driven recognition, and employees may be eligible for reward points that can be used to purchase online gifts. The recognition process includes categories that cover Sustainability Goals or projects.</p>

## C4.5

**(C4.5) Do you classify any of your existing goods and/or services as low-carbon products or do they enable a third party to avoid GHG emissions?**

Yes

### C4.5a

**(C4.5a) Provide details of your products and/or services that you classify as low-carbon products or that enable a third party to avoid GHG emissions.**

**Level of aggregation**

Product

**Description of product/Group of products**

Concentrated Liquid Bleach

**Are these low-carbon product(s) or do they enable avoided emissions?**

Avoided emissions

**Taxonomy, project or methodology used to classify product(s) as low-carbon or to calculate avoided emissions**

Other, please specify

Self Reported

**% revenue from low carbon product(s) in the reporting year**

0

**Comment**

In late 2019 and early 2020, we rolled out a new, concentrated and compacted version of our flagship bleach products. This has helped reduce the overall carbon footprint associated with the lifecycle consumption of bleach. The end product is a more convenient consumer product that is also better for the environment. It helps reduce the consumer's carbon footprint associated with the manufacture and use of the product, as well as reduces the amount of waste generated after the product is consumed and the packaging is discarded.

Compared to our bleach cleaning products previously available on the market, our current bleach products are estimated to reduce water use by more than 30 million gallons annually relative to the prior formulation. In addition to using less water to provide the same dose, this compacted bleach also requires less packaging (around 4,500 fewer metric tons of cardboard and around 3,500 fewer metric tons of plastic resin) and weighs less than our previous bleach (on a per dose basis), reducing its distribution carbon footprint. Benefits of the concentrated product include lesser paper and plastic based packaging (which in turn reduces the amount of waste to landfill), a water reduction due to the product being concentrated and related energy savings. In 2020 Clorox launched a new line of compostable wipes that meet ASTM Standard D6400. They are made from a compostable plant-based cloth, which makes them safe to compost at home, or through the local municipal facility.

The Cleaning business is working to increase PCR use across portfolio including canisters, caps, and spray bottles. We do not disclose specific product or product line revenue information publicly. We use our knowledge of the downstream lifecycle of our products and tie it to reduced emissions in transportation, retail customer handling and storage, and consumer use and disposal.

---

**Level of aggregation**

Group of products

**Description of product/Group of products**

Brita Water Filtration Products

**Are these low-carbon product(s) or do they enable avoided emissions?**

Avoided emissions

**Taxonomy, project or methodology used to classify product(s) as low-carbon or to calculate avoided emissions**

Other, please specify

Self Reported

**% revenue from low carbon product(s) in the reporting year**

0

**Comment**

Brita offers water filtration through Brita® pitchers and faucet filtration systems, and the Brita Bottle. The use of water filters provides an alternative to the use of plastic bottled

water. Last year Brita® customers filtered enough water to replace 13 billion single-use plastic water bottles. Using a Brita to filter water produces up to 4x less CO<sub>2</sub> than drinking bottled water. Switching to a Brita system replaces up to 1,800 single use plastic bottles per year. Brita also launched a new, reusable, aluminum water bottled which will be hitting store shelves soon. These will replace Brita's reusable plastic bottles.

Using Brita water filters takes advantage of the existing water pipeline infrastructure and also eliminates the fuel consumption and emissions associated with shipping around bottled water on trucks – one standard truck can carry approximately 5,000 gallons of bottled water whereas one standard truck of Brita pitcher water filters can carry over 120,000 filters or the equivalent of 4.8 million gallons of filtered water. We also partner with TerraCycle to ensure that the old Brita products can be turned into recycled goods. We do not disclose specific product or product line revenue information publicly.

We use our knowledge of the downstream lifecycle of our products and tie it to reduced emissions in transportation, retail customer handling and storage, and consumer use and disposal.

---

#### **Level of aggregation**

Group of products

#### **Description of product/Group of products**

Reduction of Resin from our Glad trash bags and food storage containers

#### **Are these low-carbon product(s) or do they enable avoided emissions?**

Avoided emissions

#### **Taxonomy, project or methodology used to classify product(s) as low-carbon or to calculate avoided emissions**

Other, please specify

Self Reported

#### **% revenue from low carbon product(s) in the reporting year**

0

#### **Comment**

The Glad® brand has been fighting waste with strong, reliable trash bags using breakthrough technology that enables our drawstring kitchen trash bags to use less plastic than leading competition (ranges from 7% to 24% less plastic vs. top 10 competitors). The brand aims to minimize waste further, including new ways to use even less plastic, for example:

- Glad brand's® revolutionary technology is making stronger kitchen trash bags with less plastic. To do so, we've had to reimagine both product construction, such as using a higher-quality resin, and the manufacturing process. The upshot is the same great-performing trash bag for our consumers with a reduced environmental impact. Glad bags about 20 million pounds less of plastic annually, the equivalent of over 920 million

single-use plastic water bottles:

- Our Glad brand reported reducing the amount of virgin plastic used in the trash bags by 13% in 2020 and a 48% reduction in virgin packaging. 99% of the Glad packaging is recyclable as of CY20.
- The Glad Manufacturing Company reuses nearly all rejected product or scrap plastic, and what it cannot use is sent to a third party for recycling. In fact, we changed the color of our drawstrings in some bags so that we could recycle 2 million additional pounds of plastic. We also help save energy and waste by including “wide-spec” resin (the “raw” form of plastic) in Glad® trash bags, which might otherwise have to be reworked or scrapped by resin suppliers. Glad® ForceFlex Plus bags launched with 50% recovered plastic and 100% recycled packaging.
- In recent years, we have reduced packaging material for 32 Glad® trash bag product items by an average of 45 percent, resulting in a significant reduction in the use of paper board and improved freight efficiency.
- The Glad compostable bags available in Canada are completely biodegradable. These bags address sustainability on two fronts. First, they are 100 percent compostable, meaning they disintegrate rapidly into compost that supports plant life. Second, the bags are
- Glad is planning to add PCR to their trash bags in the next couple of years. We do not disclose specific product or product line revenue information publicly. We use our knowledge of the downstream lifecycle of our products and tie it to reduced emissions in transportation, retail customer handling and storage, and consumer use and disposal.

---

**Level of aggregation**

Product

**Description of product/Group of products**

Freshstep Extreme Lightweight Litter

**Are these low-carbon product(s) or do they enable avoided emissions?**

Avoided emissions

**Taxonomy, project or methodology used to classify product(s) as low-carbon or to calculate avoided emissions**

Other, please specify

Self Reported

**% revenue from low carbon product(s) in the reporting year**

0

**Comment**

Fresh Step® Extreme Lightweight litter is 30 percent lighter than traditional litter. Lightweighting resulted in reducing materials used in production and a reduced transportation footprint. Fresh Step® Extreme Lightweight offers some additional eco advantages. Its base technology, a clay-coated wood, uses scrap wood that might otherwise go to

landfill.

New Fresh Step Outstretch innovation features a concentrated litter technology that allows cat owners to change their litter less often, reducing their waste to landfill impact by up to 33%.

We do not disclose specific product or product line revenue information publicly. We use our knowledge of the downstream lifecycle of our products and tie it to reduced emissions in transportation, retail customer handling and storage, and consumer use and disposal.

---

**Level of aggregation**

Group of products

**Description of product/Group of products**

Burt's Bees

**Are these low-carbon product(s) or do they enable avoided emissions?**

Avoided emissions

**Taxonomy, project or methodology used to classify product(s) as low-carbon or to calculate avoided emissions**

Other, please specify

Self Reported

**% revenue from low carbon product(s) in the reporting year**

0

**Comment**

Burt's Bees has a long track record of driving product development to avoid GHG Emissions, including the following:

- 100% of packaging is recyclable curbside or through Terracycle. Over 100,000 packaging units were submitted to TerraCycle take-back program for its small format packages, flexible tubes and film wrappers. Burt's Bees packaging is on average made from 50% recycled materials.
- Burt's Bees launched a new Gel Cleanser in a reusable glass bottle in partnership with Loop. Reuse promotes a circular economy and lowers the climate impacts associated with packaging materials and containers.
- A 41% increase in PCR content of primary container packaging over a 2011 baseline, with a 37% average PCR content across the Burt's Bees portfolio. For example, Burt's Bees redesigned its lip balm tubes to be made with 50% post-consumer recycled plastic, which helped the business exceed its 2020 goal to increase the recycled content of primary container packaging by 40%. - Shifting from a rigid plastic closure to a plastic film closure on our facial towelettes, eliminating 108,000 pounds of waste from landfills each year
- Greater than 99% of active contract manufacturing suppliers have completed a third party responsible sourcing self-assessment to date
- Maintained a carbon neutral certification, BBI Offsets scope 1, 2 and 3 emissions by

working with Natural Capital Partners to fund projects such as clean cook stoves in Uganda and landfill methane collection and combustion in North Carolina led by NC GreenPower.

- 100% of waste diverted from landfill since 2011.

We do not disclose specific product or product line revenue information publicly.

## C5. Emissions methodology

### C5.1

**(C5.1) Provide your base year and base year emissions (Scopes 1 and 2).**

#### Scope 1

---

**Base year start**

January 1, 2018

**Base year end**

December 31, 2018

**Base year emissions (metric tons CO<sub>2</sub>e)**

73,272

**Comment**

In 2019 we updated our baseline year from 2011 to 2018 and use the location-based method for our goal setting and progress reporting. We did this because we have had a significant number of acquisitions, divestitures, and closed locations since our prior baseline year in 2011. The 2018 baseline was assured in calendar year 2019. We acquired majority ownership in two locations in Saudi Arabia and adjusted the 2018 baseline accordingly.

Scope 1 emissions include emissions from stationary and mobile combustion sources.

#### Scope 2 (location-based)

---

**Base year start**

January 1, 2018

**Base year end**

December 31, 2018

**Base year emissions (metric tons CO<sub>2</sub>e)**

214,115

**Comment**

In 2019 we updated our baseline year from 2011 to 2018 and use the location-based method for our goal setting and progress reporting. We did this because we have had a significant number of acquisitions, divestitures since our prior baseline year in 2011. The

2018 baseline was assured in calendar year 2019. We acquired majority ownership in two locations in Saudi Arabia and adjusted the 2018 baseline accordingly. Scope 2 emissions are defined as Clorox's indirect emissions from purchased electricity, heat and steam. Our GHG calculations consider both the amount of electricity drawn as well as the source of that electricity (coal, gas or other types of power plant fuels). Regional electric power emission factors (eGRID data for the US, Ontario Grid Factors for Canada, and country specific IEA Grid Data for International) were used to compute indirect emissions. This conforms to the U.S. EPA Protocol and is consistent with the location-based method of the GHG Protocol.

### Scope 2 (market-based)

---

**Base year start**

January 1, 2018

**Base year end**

December 31, 2018

**Base year emissions (metric tons CO<sub>2</sub>e)**

214,115

**Comment**

In 2019 we updated our baseline year from 2011 to 2018 and use the location-based method for our goal setting and progress reporting. We did this because we have had a significant number of acquisitions, divestitures since our prior baseline year in 2011. The 2018 baseline was assured in calendar year 2019. We acquired majority ownership in two locations in Saudi Arabia and adjusted the 2018 baseline accordingly. We continued efforts to collect Scope 2 emissions in the U.S. for 2018 using the market-based method as stipulated by the GHG Protocol; however, we were unable to obtain any contractual instruments or supplier specific emission rates, and residual mix factors were not available for the markets in which Clorox operates. The impact of our Fairfield, CA solar generation was immaterial to our overall consumption and retired RECS were not available and as a result, our 2018 market-based Scope 2 emissions are identical to our location-based emissions.

## C5.2

**(C5.2) Select the name of the standard, protocol, or methodology you have used to collect activity data and calculate emissions.**

The Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard (Revised Edition)

## C6. Emissions data

### C6.1

**(C6.1) What were your organization's gross global Scope 1 emissions in metric tons CO<sub>2</sub>e?**

**Reporting year**

---

**Gross global Scope 1 emissions (metric tons CO<sub>2</sub>e)**

75,164

**Comment**

We continued efforts in 2020 to collect Scope 1 emissions in at locations where we have operational control. Scope 1 emissions include emissions from stationary and mobile combustion sources.

### C6.2

**(C6.2) Describe your organization's approach to reporting Scope 2 emissions.**

**Row 1**

---

**Scope 2, location-based**

We are reporting a Scope 2, location-based figure

**Scope 2, market-based**

We have no operations where we are able to access electricity supplier emission factors or residual emissions factors and are unable to report a Scope 2, market-based figure

**Comment**

We continued efforts in 2020 to collect Scope 2 emissions in the U.S. using the market-based method as stipulated by the GHG Protocol; however, we were unable to obtain any contractual instruments or supplier specific emission rates, and residual mix factors were not available for the markets in which Clorox operates. The impact of our Fairfield, CA solar generation was immaterial to our overall consumption and retired RECS were not available and as a result, our 2020 market-based Scope 2 emissions are identical to our location-based emissions.

### C6.3

**(C6.3) What were your organization's gross global Scope 2 emissions in metric tons CO<sub>2</sub>e?**

**Reporting year**

---

**Scope 2, location-based**

184,379

### Comment

We acquired majority ownership in two locations in Saudi Arabia in mid- 2020, emissions from these locations are based on the entire calendar year, our 2018 baseline was adjusted accordingly.

Scope 2 emissions are defined as Clorox's indirect emissions from purchased electricity, heat and steam. Our GHG calculations consider both the amount of electricity drawn as well as the source of that electricity (coal, gas or other types of power plant fuels).

Regional electric power emission factors (eGRID for the US, Ontario Grid Factors for Canada, and country specific IEA Grid Data for International) were used to compute indirect emissions. This conforms to the U.S. EPA Protocol and is consistent with the location-based method of the GHG Protocol.

## C6.4

**(C6.4) Are there any sources (e.g. facilities, specific GHGs, activities, geographies, etc.) of Scope 1 and Scope 2 emissions that are within your selected reporting boundary which are not included in your disclosure?**

No

## C6.5

**(C6.5) Account for your organization's gross global Scope 3 emissions, disclosing and explaining any exclusions.**

### Purchased goods and services

---

#### Evaluation status

Relevant, not yet calculated

#### Please explain

Trucost used its proprietary hybrid EEIO/LCA model in conjunction with Clorox data on revenue by business activity to calculate absolute emissions from all of Clorox's purchased goods and service, and estimated this to be about 1.1 million tons CO<sub>2</sub>e. We are not reporting this number because it is an approximation that was not assured by a third party.

In 2021 Clorox engaged a third party to calculate Scope 3 emissions from Purchased Goods and Services using a Life Cycle Analysis approach. The purpose is to establish SBTs relative to our 2020 baseline. We also joined CDP Supply Chain and calculated the Scope 3 emissions from our purchased goods and services based on 75% of our spend. We anticipate reporting these numbers next year, upon acceptance of the SBTs.

### Capital goods

---

#### Evaluation status

Not relevant, explanation provided

#### Please explain

Trucost used its proprietary hybrid EEIO/LCA in conjunction with Clorox data on revenue by business activity to calculate absolute emissions from all of Clorox's capital goods. This includes goods such as computer equipment, etc. This was found to be Not Relevant (Immaterial) by Trucost, at less than 1% of our total estimated Scope 3 GHG emissions.

## Fuel-and-energy-related activities (not included in Scope 1 or 2)

---

### Evaluation status

Relevant, calculated

### Metric tonnes CO<sub>2</sub>e

49,889

### Emissions calculation methodology

In 2021 Clorox engaged a third party to calculate Scope 3 emissions from Fuel and Energy Related activities. This includes the Upstream Fuel Use emissions, Upstream Electric Use Emissions Prior to Generation, and Upstream Emissions from T&D Losses for all US and International locations where we have operational control. The world-wide fuel and energy related Scope 3 GHG emissions were calculated to be 49,889 MTCO<sub>2</sub>e, following Chapter 3 Technical Guidance for Calculating Scope 3 emissions. The data was based on the Scope 1 and 2 emissions but was not assured by a third party.

### Percentage of emissions calculated using data obtained from suppliers or value chain partners

0

### Please explain

In 2021 Clorox engaged a third party to calculate Scope 3 emissions from Fuel and Energy Related activities. This includes the Upstream Fuel Use emissions, Upstream Electric Use Emissions Prior to Generation, and Upstream Emissions from T&D Losses for all US and International locations where we have operational control. The world-wide fuel and energy related Scope 3 GHG emissions were calculated to be 49,889 MTCO<sub>2</sub>e, following Chapter 3 Technical Guidance for Calculating Scope 3 emissions. All calculations were based on the reported Scope 1 and 2 emissions following the Technical guidance. The data was not assured by a third party.

## Upstream transportation and distribution

---

### Evaluation status

Relevant, calculated

### Metric tonnes CO<sub>2</sub>e

369,042

### Emissions calculation methodology

The Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard (Revised Edition). This includes all the emissions associated with the transportation and

distribution of Clorox's finished products by non-affiliated carriers to regional distribution centers and to the trade (retailers) within the United States. These include all modes (air, ocean, truck, and intermodal-rail) of transport. Scope 3 distribution emissions include transportation: 1) between production facilities; 2) from production facilities to distribution centers; 3) from production facilities to customer distribution centers and 4) from distribution centers to customer distribution centers. All data is extracted from Clorox's enterprise data management system and provided to our external consultants who calculate our emissions using the most recently available emissions factors and convert to metric tons of CO<sub>2</sub>e.

**Percentage of emissions calculated using data obtained from suppliers or value chain partners**

0

**Please explain**

This includes Scope 3 distribution emissions for truck transportation by customers: from production facilities to customer distribution centers and from distribution centers to customer distribution centers. All data (100%) is extracted from Clorox's enterprise data management system and provided to our external consultants who calculate our emissions using the most recently available emissions factors and convert to metric tons of CO<sub>2</sub>e.

**Waste generated in operations**

---

**Evaluation status**

Not relevant, explanation provided

**Please explain**

Trucost used its proprietary hybrid EEIO/LCA in conjunction with Clorox data on revenue by business activity to calculate absolute emissions from all of Clorox's waste generated in operations. This was found to be Not Relevant (Immaterial) by Trucost, at less than 1% of the total estimated Scope 3 GHG emissions.

**Business travel**

---

**Evaluation status**

Relevant, calculated

**Metric tonnes CO<sub>2</sub>e**

1,117

**Emissions calculation methodology**

The Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard (Revised Edition). This includes emissions associated with domestic and international air travel miles as well as rental and fleet car miles for the reporting period. All calculations were performed by our contracted consultants at Liberty Environmental using current emission factors and converted to metric tons CO<sub>2</sub>e.

**Percentage of emissions calculated using data obtained from suppliers or value chain partners**

95

**Please explain**

This includes emissions associated with domestic and international air travel miles as well as rental car and company car fleet miles for the reporting period. All calculations were performed using current emission factors and converted to metric tons CO<sub>2</sub>e. Raw data for air travel is provided by American Express, our contracted travel management vendor. Rental car data is provided by Hertz, our contracted rental car vendor. Company car fleet mileage and gasoline usage data is maintained by the company's internal travel management team and is adjusted to account for non-business travel. The externally reported data our suppliers, Hertz and American Express represent approximately 95% of the data. The rest comes from our internal fleet reports.

**Employee commuting**

---

**Evaluation status**

Relevant, not yet calculated

**Please explain**

Trucost calculated the average greenhouse gas emissions per employee using Clorox provided employee data and national statistical data on average commuter distance travelled and travel mode. Estimated to be 72,000 metric tons CO<sub>2</sub>e. We are not reporting this number because it is an approximation and was not assured by a third party.

**Upstream leased assets**

---

**Evaluation status**

Not relevant, explanation provided

**Please explain**

Trucost calculated the average emission intensity of upstream leased assets per employee using Clorox provided data on fully occupied leased space that is reported in the company's scope 1 and 2 emissions. This average intensity was applied to the number of employees working in leased facilities where emissions are not reported in Clorox's scope 1 and 2 due to shared tenancy. This was found to be Not Relevant (e.g. Immaterial) by Trucost, at less than 1% of the estimated Scope 3 GHG emissions.

**Downstream transportation and distribution**

---

**Evaluation status**

Relevant, calculated

**Metric tonnes CO<sub>2</sub>e**

127,907

**Emissions calculation methodology**

The Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard (Revised Edition). This includes all the emissions associated with the transportation and distribution of Clorox's finished products by non-affiliated customer carriers to their regional distribution centers and to the trade (retailers) within the United States (aka customer pickups). Trucking is the mode of transportation. Scope 3 distribution emissions include transportation: 1) from production facilities to customer distribution centers and 2) from distribution centers to customer distribution centers. All data is extracted from Clorox's enterprise data management system and provided to our external consultants who calculate our emissions using the most recently available emissions factors and convert to metric tons of CO<sub>2</sub>e. The downstream transportation and distribution emissions were not assured.

**Percentage of emissions calculated using data obtained from suppliers or value chain partners**

0

**Please explain**

This includes Scope 3 distribution emissions for truck transportation by customers: from production facilities to customer distribution centers and from distribution centers to customer distribution centers. All data (100%) is extracted from Clorox's enterprise data management system and provided to our external consultants who calculate our emissions using the most recently available emissions factors and convert to metric tons of CO<sub>2</sub>e.

**Processing of sold products**

---

**Evaluation status**

Not relevant, explanation provided

**Please explain**

Trucost calculated the direct and indirect emissions from products in-use phase based on Life Cycle Analyses (LCA). In-use emissions for Clorox products were calculated using LCA data assuming an average product in each category. Processing of sold products was not applicable because Clorox produces finished products, not intermediate products.

**Use of sold products**

---

**Evaluation status**

Relevant, not yet calculated

**Please explain**

Trucost calculated the direct and indirect emissions from products in-use phase based on Life Cycle Analyses (LCA). In-use emissions for Clorox products were calculated using LCA data assuming an average product in each category. We are not reporting this number because it is an approximation and was not assured by a third party. In 2021 Clorox engaged a third party to calculate Scope 3 emissions from Use of Sold Products using a Life Cycle Analysis approach. The purpose is to establish SBTs

relative to our 2020 baseline. We anticipate reporting these numbers next year, upon acceptance of the SBTs.

### End of life treatment of sold products

---

#### Evaluation status

Not relevant, explanation provided

#### Please explain

Trucost used its proprietary hybrid EEIO/LCA model in conjunction with Clorox data on revenue by business activity to calculate the quantity of products used (paper, plastic, glass and wood). GHG emissions and reduction were calculated based on EPA emission factors taking into account product end-of-life treatment. This was reported by Trucost as immaterial, at less than 1% of the total estimated Scope 3 GHG emissions.

### Downstream leased assets

---

#### Evaluation status

Not relevant, explanation provided

#### Please explain

Not found to be relevant to our operations per our analysis with Trucost. (Not Applicable) because we don't have downstream leased assets that are outside of our Scope 1 and Scope 2 reporting.

### Franchises

---

#### Evaluation status

Not relevant, explanation provided

#### Please explain

Not found to be relevant to our operations per our analysis with Trucost. (Not Applicable), Clorox does not have Franchises.

### Investments

---

#### Evaluation status

Not relevant, explanation provided

#### Please explain

Not found to be relevant to our operations per our analysis with Trucost, it does not apply to Clorox's businesses. (Not Applicable).

### Other (upstream)

---

#### Evaluation status

Not relevant, explanation provided

#### Please explain

Not found to be relevant to our operations per our analysis with Trucost. (Not Applicable)

**Other (downstream)**

**Evaluation status**

Not relevant, explanation provided

**Please explain**

Not found to be relevant to our operations per our analysis with Trucost. (Not Applicable)

**C6.7**

**(C6.7) Are carbon dioxide emissions from biogenic carbon relevant to your organization?**

Yes

**C6.7a**

**(C6.7a) Provide the emissions from biogenic carbon relevant to your organization in metric tons CO2.**

	<b>CO2 emissions from biogenic carbon (metric tons CO2)</b>	<b>Comment</b>
Row 1	1,017,290	Biogenic emissions went up, principally due to increased production to meet increased demand for our Kingsford business in response to the COVID 19 pandemic.

**C6.10**

**(C6.10) Describe your gross global combined Scope 1 and 2 emissions for the reporting year in metric tons CO2e per unit currency total revenue and provide any additional intensity metrics that are appropriate to your business operations.**

**Intensity figure**

34.49

**Metric numerator (Gross global combined Scope 1 and 2 emissions, metric tons CO2e)**

259,543

**Metric denominator**

unit total revenue

**Metric denominator: Unit total**

7,524

**Scope 2 figure used**

Location-based

**% change from previous year**

10

**Direction of change**

Decreased

**Reason for change**

On a revenue based intensity scale, our 2020 gross emissions are down by 10% vs 2019 primarily as a function of production efficiencies achieved during the COVID 19 pandemic. Clorox experienced a significant increase in demand across most businesses. In order to meet the demand, the plants intentionally produced fewer SKUs, reduced the number of change overs, delayed projects, and worked to increase run times. As a result, we were able to produce more volume using less energy and produce fewer emissions per dollar of revenue. Our Cleaning business also rolled out a project to compact product that, in part, contributed to reduced GHG emissions. Scope 1 and Scope 2 absolute emissions increases in 2020 vs. the previous year, were a direct result of increased production.

---

**Intensity figure**

418

**Metric numerator (Gross global combined Scope 1 and 2 emissions, metric tons CO2e)**

259,543

**Metric denominator**

Other, please specify  
Millions of cases sold

**Metric denominator: Unit total**

621.1

**Scope 2 figure used**

Location-based

**% change from previous year**

9

**Direction of change**

Decreased

**Reason for change**

Numerator = Total Scope 1 and Scope 2 emissions in Metric Tons of CO2 equivalent for 2020. Denominator = Number of units (cases) of product sold (in millions) in 2020. On a units of production (stat case) based intensity scale, our gross emissions are down by 9%% due to a decrease in stat case production as well as energy reduction efforts

leading to greater efficiency. Scope 1 and Scope 2 absolute emissions increased in 2020 vs. the previous year as a result of increased production.

## C7. Emissions breakdowns

### C7.1

**(C7.1) Does your organization break down its Scope 1 emissions by greenhouse gas type?**

Yes

#### C7.1a

**(C7.1a) Break down your total gross global Scope 1 emissions by greenhouse gas type and provide the source of each used greenhouse warming potential (GWP).**

Greenhouse gas	Scope 1 emissions (metric tons of CO2e)	GWP Reference
CO2	61,204	IPCC Fourth Assessment Report (AR4 - 100 year)  <sup>1</sup>
CH4	1,994	IPCC Fourth Assessment Report (AR4 - 100 year)  <sup>2</sup>
N2O	11,810	IPCC Third Assessment Report (TAR - 100 year)  <sup>3</sup>
HFCs	156	IPCC Fourth Assessment Report (AR4 - 100 year)  <sup>4</sup>

<sup>1</sup>As reported by 3rd Party Air Consultant

<sup>2</sup>As reported by 3rd Party Air Consultant

<sup>3</sup>As reported by 3rd Party Air Consultant

<sup>4</sup>As reported by 3rd Party Air Consultant

### C7.2

**(C7.2) Break down your total gross global Scope 1 emissions by country/region.**

Country/Region	Scope 1 emissions (metric tons CO2e)
United States of America	72,267
Canada	1,313

Latin America (LATAM)	1,246
Other, please specify Rest of World	338

### C7.3

**(C7.3) Indicate which gross global Scope 1 emissions breakdowns you are able to provide.**

By business division

### C7.3a

**(C7.3a) Break down your total gross global Scope 1 emissions by business division.**

Business division	Scope 1 emissions (metric ton CO2e)
Health & Wellness (Laundry, Home Care, Away From Home, PPD)	3,764
Household (Bags and Wraps, Charcoal, Cat Litter)	56,915
Lifestyle (Dressings and Sauces, Water Filtration, Global Natural Personal Care)	4,173
International (All countries outside of the US, excluding Natural Personal Care and Water Filtration)	2,094
Offices and Distribution Centers	8,218

### C7.5

**(C7.5) Break down your total gross global Scope 2 emissions by country/region.**

Country/Region	Scope 2, location-based (metric tons CO2e)	Scope 2, market-based (metric tons CO2e)	Purchased and consumed electricity, heat, steam or cooling (MWh)	Purchased and consumed low-carbon electricity, heat, steam or cooling accounted for in Scope 2 market-based approach (MWh)
United States of America	155,814	155,814	372,486	0
Canada	388	388	13,124	0
Latin America (LATAM)	11,955	11,955	39,800	0
Other, please specify Rest of World	16,222	16,222	30,956	0

## C7.6

**(C7.6) Indicate which gross global Scope 2 emissions breakdowns you are able to provide.**

By business division

### C7.6a

**(C7.6a) Break down your total gross global Scope 2 emissions by business division.**

Business division	Scope 2, location-based (metric tons CO2e)	Scope 2, market-based (metric tons CO2e)
Health & Wellness (Laundry, Home Care, Away From Home, PPD)	25,112	25,112
Household (Bags and Wraps, Charcoal, Cat Litter)	111,120	111,120
Lifestyle (Dressings and Sauces, Water Filtration, Global Natural Personal Care)	9,823	9,823
International (All countries outside of the US, excluding Natural Personal Care and Water Filtration)	28,398	28,398
Offices and Distribution Centers	9,926	9,926

## C7.9

**(C7.9) How do your gross global emissions (Scope 1 and 2 combined) for the reporting year compare to those of the previous reporting year?**

Increased

### C7.9a

**(C7.9a) Identify the reasons for any change in your gross global emissions (Scope 1 and 2 combined), and for each of them specify how your emissions compare to the previous year.**

	Change in emissions (metric tons CO2e)	Direction of change	Emissions value (percentage)	Please explain calculation
Change in renewable energy consumption	0	No change	0	Clorox's Fairfield Plant has a small solar power system but we haven't retired the RECs so we do not take credit for the renewable energy consumption so we are reporting this as 0 even though solar

				system provides approximately 700 MWh of energy and replaces almost 500 MTCO <sub>2</sub> e of Scope 2 GHG emissions. We anticipate this increasing in 2021, with the purchase of Renewable Energy Credits (RECs) and Virtual Purchase Power Agreements (VPPA).
Other emissions reduction activities	12,585	Decreased	5	We continue to implement emission reduction projects and activities. This number is based on the emission reductions that are implemented or where implementation has commenced as reported in Section C.4.3(a)
Divestment				No change, no divestments in 2020.
Acquisitions	15,338	Increased	7	In Q3, CY20 we acquired majority ownership of a cleaning business in Saudi Arabia. The increase represents a full year of emissions in CY20. We updated our 2018 baseline but not our 2019 emissions data for the Saudi Arabia locations.
Mergers				No change, no mergers in 2020.
Change in output	21,856	Increased	9.3	In 2020 our production increased by around 18%, excluding the newly acquired locations. Our absolute Scope 1 and Scope 2 emissions increased by approximately 9,531 MTCO <sub>2</sub> e as a result of increased production and transportation in order to meet demand during the COVID 19 pandemic. This number was calculated by subtracting 2020 emissions from 2019, then backing out the emissions associated with the acquisition. Of note is that emissions actually decreased relative to volume sold due to increased operational efficiencies.
Change in methodology				No Change in methodology. The most current, location specific emission factors were used to calculate the Scope 1 and Scope 2 emissions.
Change in boundary				No Change in operational boundary.

Change in physical operating conditions	80	Increased	0.03	Our Atlanta Plant added a new Wipes production line, which resulted in a net increase of their footprint by approximately 80 MT CO2e. This was estimated by subtracting the 2020 emissions from the 2019 emissions
Unidentified				
Other				

## C7.9b

**(C7.9b) Are your emissions performance calculations in C7.9 and C7.9a based on a location-based Scope 2 emissions figure or a market-based Scope 2 emissions figure?**

Location-based

## C8. Energy

### C8.1

**(C8.1) What percentage of your total operational spend in the reporting year was on energy?**

More than 5% but less than or equal to 10%

### C8.2

**(C8.2) Select which energy-related activities your organization has undertaken.**

	Indicate whether your organization undertook this energy-related activity in the reporting year
Consumption of fuel (excluding feedstocks)	Yes
Consumption of purchased or acquired electricity	Yes
Consumption of purchased or acquired heat	No
Consumption of purchased or acquired steam	No
Consumption of purchased or acquired cooling	No
Generation of electricity, heat, steam, or cooling	No

## C8.2a

**(C8.2a) Report your organization's energy consumption totals (excluding feedstocks) in MWh.**

	Heating value	MWh from renewable sources	MWh from non-renewable sources	Total (renewable and non-renewable) MWh
Consumption of fuel (excluding feedstock)	HHV (higher heating value)	0	306,173	306,173
Consumption of purchased or acquired electricity		0	456,366	456,366
Total energy consumption		0	762,539	762,539

## C8.2b

**(C8.2b) Select the applications of your organization's consumption of fuel.**

	Indicate whether your organization undertakes this fuel application
Consumption of fuel for the generation of electricity	No
Consumption of fuel for the generation of heat	Yes
Consumption of fuel for the generation of steam	Yes
Consumption of fuel for the generation of cooling	Yes
Consumption of fuel for co-generation or tri-generation	No

## C8.2c

**(C8.2c) State how much fuel in MWh your organization has consumed (excluding feedstocks) by fuel type.**

### Fuels (excluding feedstocks)

Diesel

### Heating value

HHV (higher heating value)

**Total fuel MWh consumed by the organization**

20,173

**MWh fuel consumed for self-generation of heat**

0

**MWh fuel consumed for self-generation of steam**

0

**MWh fuel consumed for self-generation of cooling**

0

**Emission factor**

22.83

**Unit**

lb CO2 per gallon

**Emissions factor source**

Emission Factor equals the total of separate CO<sub>2</sub>, CH<sub>4</sub> and N<sub>2</sub>O emission factors with CH<sub>4</sub> and N<sub>2</sub>O Emission Factors being multiplied by Global Warming Potentials (GWPs) of 25 and 298, respectively. The published emission factor units for each fuel type were used, then converted to one common unit for all GHGs.

Emission factor sources include:

U.S. EPA Climate Leaders Guidance for Mobile Sources, Appendix A (1/2016) for CO<sub>2</sub> Table 5, Industrial/Commercial Equipment - Emission Factors for Greenhouse Gas Inventories, - U.S. EPA Center for Corporate Climate Leadership (3/26/20) were used to calculate CH<sub>4</sub> and N<sub>2</sub>O emissions.

**Comment**

This is the amount of energy from diesel used for mobile fuels. Fuel consumed for generation of heat, steam, or cooling does not apply.

---

**Fuels (excluding feedstocks)**

Distillate Oil

**Heating value**

HHV (higher heating value)

**Total fuel MWh consumed by the organization**

34,731

**MWh fuel consumed for self-generation of heat**

0

**MWh fuel consumed for self-generation of steam**

0

**MWh fuel consumed for self-generation of cooling**

0

**Emission factor**

163.61

**Unit**

lb CO2e per million Btu

**Emissions factor source**

Emission Factor equals the total of separate CO<sub>2</sub>, CH<sub>4</sub> and N<sub>2</sub>O emission factors with CH<sub>4</sub> and N<sub>2</sub>O Emission Factors being multiplied by Global Warming Potentials (GWPs) of 25 and 295 respectively. Published emission factor units for each fuel type converted to one common unit for all GHG's.

Emission Factor Source: 40 CFR Part 98 Table C-1

**Comment**

This is the amount of energy from fuel oils used for stationary fuels. We do not breakout the percentages consumed for generation of heat, steam, or cooling.

---

**Fuels (excluding feedstocks)**

Natural Gas

**Heating value**

HHV (higher heating value)

**Total fuel MWh consumed by the organization**

216,083

**MWh fuel consumed for self-generation of heat**

0

**MWh fuel consumed for self-generation of steam**

0

**MWh fuel consumed for self-generation of cooling**

0

**Emission factor**

117.01

**Unit**

lb CO2e per million Btu

**Emissions factor source**

Emission Factor equals the total of separate CO<sub>2</sub>, CH<sub>4</sub> and N<sub>2</sub>O emission factors with CH<sub>4</sub> and N<sub>2</sub>O Emission Factors being multiplied by Global Warming Potentials (GWPs) of 25 and 295 respectively. Published emission factor units for each fuel type converted to one common unit for all GHG's.

Emission Factor Source: 40 CFR Part 98 Table C-1

**Comment**

We do not breakout the percentages consumed for generation of heat, steam, or cooling.

---

**Fuels (excluding feedstocks)**

Propane Gas

**Heating value**

**Total fuel MWh consumed by the organization**

9,704

**MWh fuel consumed for self-generation of heat**

0

**MWh fuel consumed for self-generation of steam**

0

**MWh fuel consumed for self-generation of cooling**

0

**Emission factor**

136.06

**Unit**

lb CO<sub>2</sub>e per million Btu

**Emissions factor source**

Emission Factor equals the total of separate CO<sub>2</sub>, CH<sub>4</sub> and N<sub>2</sub>O emission factors with CH<sub>4</sub> and N<sub>2</sub>O Emission Factors being multiplied by Global Warming Potentials (GWPs) of 25 and 295 respectively. Published emission factor units for each fuel type converted to one common unit for all GHG's.

Emission Factor Source: 40 CFR Part 98 Table C-1

**Comment**

This is the amount of energy from propane used for mobile equipment. Fuel consumed for generation of heat, steam, or cooling does not apply.

---

**Fuels (excluding feedstocks)**

Propane Liquid

**Heating value**

HHV (higher heating value)

**Total fuel MWh consumed by the organization**

24,692

**MWh fuel consumed for self-generation of heat**

0

**MWh fuel consumed for self-generation of steam**

0

**MWh fuel consumed for self-generation of cooling**

0

**Emission factor**

12.81

**Unit**

lb CO<sub>2</sub>e per gallon

**Emissions factor source**

Emission Factor equals the total of separate CO<sub>2</sub>, CH<sub>4</sub> and N<sub>2</sub>O emission factors with CH<sub>4</sub> and N<sub>2</sub>O Emission Factors being multiplied by Global Warming Potentials (GWPs) of 25 and 295 respectively. Published emission factor units for each fuel type converted to one common unit for all GHG's.

Emission factor sources include:

U.S. EPA Climate Leaders Guidance for Mobile Sources, Appendix A (1/2016) for CO<sub>2</sub> Table 5, Industrial/Commercial Equipment - Emission Factors for Greenhouse Gas Inventories, - U.S. EPA Center for Corporate Climate Leadership (3/26/20) were used to calculate CH<sub>4</sub> and N<sub>2</sub>O emissions.

**Comment**

This is the amount of energy from propane used for stationary equipment. We do not break out the percentages consumed for generation of heat, steam, or cooling.

---

**Fuels (excluding feedstocks)**

Motor Gasoline

**Heating value**

HHV (higher heating value)

**Total fuel MWh consumed by the organization**

790

**MWh fuel consumed for self-generation of heat**

0

**MWh fuel consumed for self-generation of steam**

0

**MWh fuel consumed for self-generation of cooling**

0

**Emission factor**

19.79

**Unit**

**Emissions factor source**

Emission Factor equals the total of separate CO<sub>2</sub>, CH<sub>4</sub> and N<sub>2</sub>O emission factors with CH<sub>4</sub> and N<sub>2</sub>O Emission Factors being multiplied by Global Warming Potentials (GWPs) of 25 and 295 respectively. Published emission factor units for each fuel type converted to one common unit for all GHG's.

Emission factor sources include:

U.S. EPA Climate Leaders Guidance for Mobile Sources, Appendix A (1/2016) for CO<sub>2</sub> Tables 3, 4 and 5 Emission Factors for Greenhouse Gas Inventories, - U.S. EPA Center for Corporate Climate Leadership (3/26/20) for CH<sub>4</sub> and N<sub>2</sub>O emissions.

**Comment**

This is the amount of energy from gasoline used in mobile equipment. Fuel consumed for generation of heat, steam, or cooling does not apply.

## C9. Additional metrics

### C9.1

**(C9.1) Provide any additional climate-related metrics relevant to your business.**

---

**Description**

Energy usage

**Metric value**

1.23

**Metric numerator**

Megawatt Hours (MWH)

**Metric denominator (intensity metric only)**

1000 cases of product sold

**% change from previous year**

6

**Direction of change**

Decreased

**Please explain**

Our overall energy usage decreased 6% on an intensity basis (per case of product sold) vs. 2019. This was attributed to more efficient operations focused on meeting demand. For example, plants reduced the number of SKUs produced, which reduced change overs and start up/shut downs. Going forward our goal is to drive continued sustainability efficiency improvements in our operations vs. 2018 base year. In 2019, we reset our global footprint baseline to calendar year 2018. In 2020 we achieved a 15% reduction in Energy on an intensity basis relative our 2018 baseline.

---

**Description**

Waste

**Metric value**

1.09

**Metric numerator**

Standard US tons of waste

**Metric denominator (intensity metric only)**

100,000 cases of product sold

**% change from previous year**

24

**Direction of change**

Decreased

**Please explain**

Our overall waste generation decreased 24% on an intensity basis (per case of product sold) vs 2019. We had less waste generated because due to more efficient production. We also initiated a concerted effort to drive down waste across all lines of business, increasing the number of Zero Waste to Locations. This data includes one of two locations in Saudi locations where we acquired majority ownership in mid- 2020, the other location did not report their total waste volumes in time for the CDP submittal.

Going forward our goal is to drive continued sustainability efficiency improvements in our operations vs. 2018 base year. In 2019, we reset our global footprint baseline to

calendar year 2018. In 2020 we reduced our waste footprint by 45% on an intensity basis and 34% on an absolute basis relative to our 2018 baseline.

**Description**

Other, please specify  
Water Use

**Metric value**

1,441

**Metric numerator**

Gallons of Water

**Metric denominator (intensity metric only)**

1000 cases of product sold

**% change from previous year**

4

**Direction of change**

Decreased

**Please explain**

Our overall water use decreased 4% on an intensity basis (per case of product sold) vs 2019. Going forward our goal is to drive continued sustainability efficiency improvements in our operations vs. 2018 base year. In 2019, we reset our global footprint baseline to calendar year 2018. In 2020 we reduced our water footprint by 14% on an intensity basis relative to 2018 but water use did increase on an absolute basis by around 2% mostly due to increased production associated with the COVID 19 pandemic. This includes water use at two locations in Saudi Arabia, where we acquired majority ownership in mid-2020.

## C10. Verification

### C10.1

**(C10.1) Indicate the verification/assurance status that applies to your reported emissions.**

	Verification/assurance status
Scope 1	Third-party verification or assurance process in place
Scope 2 (location-based or market-based)	Third-party verification or assurance process in place
Scope 3	Third-party verification or assurance process in place

## C10.1a

**(C10.1a) Provide further details of the verification/assurance undertaken for your Scope 1 emissions, and attach the relevant statements.**

---

**Verification or assurance cycle in place**

Annual process

**Status in the current reporting year**

Complete

**Type of verification or assurance**

Limited assurance

**Attach the statement**

 Clorox Independent Accountants Report - FY21 Phase I - Signed.pdf

**Page/ section reference**

Clorox Independent Accountants' Report– FY21 Phase 1 - Signed.PDF  
Page 2; Appendix A  
AICPA (AT-C section 105 and section 210)

**Relevant standard**

Attestation standards established by AICPA (AT105)

**Proportion of reported emissions verified (%)**

100

## C10.1b

**(C10.1b) Provide further details of the verification/assurance undertaken for your Scope 2 emissions and attach the relevant statements.**

---

**Scope 2 approach**

Scope 2 location-based

**Verification or assurance cycle in place**

Annual process

**Status in the current reporting year**

Complete

**Type of verification or assurance**

Limited assurance

**Attach the statement**

 Clorox Independent Accountants Report - FY21 Phase I - Signed.pdf

**Page/ section reference**

Clorox Phase 1 Independent Accountants' Report – FY21 Phase 1 - Signed.PDF

Page 2; Appendix A

AICPA (AT-C section 105 and section 210)

**Relevant standard**

Attestation standards established by AICPA (AT105)

**Proportion of reported emissions verified (%)**

100

## C10.1c

**(C10.1c) Provide further details of the verification/assurance undertaken for your Scope 3 emissions and attach the relevant statements.**

---

**Scope 3 category**

Scope 3: Business travel

**Verification or assurance cycle in place**

Annual process

**Status in the current reporting year**

Complete

**Type of verification or assurance**

Limited assurance

**Attach the statement**

 Clorox Independent Accountants Report - FY21 Phase I - Signed.pdf

**Page/section reference**

Clorox Phase 1 Independent Accountants' Report – FY21 Phase 1 - Signed.PDF

Page 2; Appendix A

Note: 370,159 MTCO<sub>2</sub>e was verified in the attached report. Business Travel accounts for 1,117 of the verified 370,159 MTCO<sub>2</sub>e.

AICPA (AT-C section 105 and section 210)

**Relevant standard**

Attestation standards established by AICPA (AT105)

**Proportion of reported emissions verified (%)**

100

---

**Scope 3 category**

Scope 3: Upstream transportation and distribution

**Verification or assurance cycle in place**

Annual process

**Status in the current reporting year**

Complete

**Type of verification or assurance**

Limited assurance

**Attach the statement**

 Clorox Independent Accountants Report - FY21 Phase I - Signed.pdf

**Page/section reference**

Clorox Independent Accountants' Report – FY21 Phase 1 - Signed.PDF

Page 2; Appendix A

Note: 370,159 MTCO<sub>2</sub>e was verified in the attached report. Upstream transportation and distribution accounts for 369,042 MTCO<sub>2</sub>e of the verified 370,159 MTCO<sub>2</sub>

**Relevant standard**

Attestation standards established by AICPA (AT105)

**Proportion of reported emissions verified (%)**

100

---

**Scope 3 category**

Scope 3: Downstream transportation and distribution

**Verification or assurance cycle in place**

Annual process

**Status in the current reporting year**

No verification or assurance of current reporting year

**Type of verification or assurance**

Not applicable

**Attach the statement**

**Page/section reference**

Note: The Scope 3 downstream distribution emissions for truck transportation by customers was compiled and calculated using the same methods as the upstream distribution emissions but this data was not assured by a third party.

**Relevant standard**

**Proportion of reported emissions verified (%)**

0

**C10.2**

**(C10.2) Do you verify any climate-related information reported in your CDP disclosure other than the emissions figures reported in C6.1, C6.3, and C6.5?**

Yes

**C10.2a**

**(C10.2a) Which data points within your CDP disclosure have been verified, and which verification standards were used?**

 Clorox Independent Accountants Report - FY21 Phase I - Signed.pdf

Disclosure module verification relates to	Data verified	Verification standard	Please explain
C8. Energy	Energy consumption	Attestation standards established by AICPA (AT-C 105 and AT-C 210)	Clorox conducted a verification of all energy consumption by a third party. The energy data reported in Section C8.2a was verified as the Total Energy Consumption number reported in the Clorox Phase 1 Independent Accountants' Report – FY21 Phase 1 - Signed.PDF: Page 2; Appendix A.  1

 1 Clorox Independent Accountants Report - FY21 Phase I - Signed.pdf

**C11. Carbon pricing**

**C11.1**

**(C11.1) Are any of your operations or activities regulated by a carbon pricing system (i.e. ETS, Cap & Trade or Carbon Tax)?**

No, and we do not anticipate being regulated in the next three years

## C11.2

**(C11.2) Has your organization originated or purchased any project-based carbon credits within the reporting period?**

No

## C11.3

**(C11.3) Does your organization use an internal price on carbon?**

No, and we do not currently anticipate doing so in the next two years

## C12. Engagement

### C12.1

**(C12.1) Do you engage with your value chain on climate-related issues?**

Yes, our suppliers

### C12.1a

**(C12.1a) Provide details of your climate-related supplier engagement strategy.**

---

#### Type of engagement

Information collection (understanding supplier behavior)

#### Details of engagement

#### % of suppliers by number

3

#### % total procurement spend (direct and indirect)

70

#### % of supplier-related Scope 3 emissions as reported in C6.5

0

#### Rationale for the coverage of your engagement

We introduced a Supplier Environmental Footprint Scorecard in 2014 to measure the footprint of our Top 100 suppliers that collectively represent approximately 2/3 or 66% of our spending. In 2019, 100% of our Top 100 suppliers responded to our survey. Of those who responded, approximately 76% responded that they are measuring their water usage, and 38% reported that they have set public water reduction goals

As we move forward on our journey in climate stewardship we are focusing on top

supplies who have the biggest potential footprints with respect tracking their usage, setting public reduction goals and engaging in conservation and reduction efforts. In 2019 we transitioned from score-carding our suppliers to driving sustainable and ethical practices across our operations and our supply chain. To help us meet this commitment, we joined the CDP Supply Chain in 2019 and have asked our 160 top suppliers representing over 70% of our global spend to report their emissions. We are using this data to help drive progress against our anticipated Scope 3 Science-based targets to reduce greenhouse gas (GHG) emissions, submitted and expected to be approved by the Science-based Target Initiative in 2021.

Due to the large number of suppliers in our network (approximately 6,000), it was not feasible to survey our entire supplier base. Approximately 70% of spend provided a good cross-section of our suppliers (2-3% by total number) and captured the top suppliers that have the biggest impact on our supply chain footprint and Scope 3 GHG emissions.

We did not report Scope 3 Emissions from our suppliers in Section 6.5 (outside of distribution).

### **Impact of engagement, including measures of success**

We introduced a Supplier Environmental Footprint Scorecard in 2014 to measure the footprint of our Top 100 suppliers that collectively represent approximately 2/3 of our spending. The scorecard enables us to profile top-supplier efforts to measure, set goals and report on water and energy consumption; greenhouse gas (GHG) emissions; and waste-to-landfill reductions. It also seeks data about our top suppliers' suppliers (Clorox second-tier suppliers) to expand our view of and ability to impact our upstream supply chain.

Since launching our Top 100 supplier scorecard in 2014 through 2019, we saw a 25 percentage point increase in supplier response rate, a 15 percentage point increase in suppliers measuring water use, and an 8 percentage point increase in suppliers setting public water reduction goals. We signed up for the CDP supply chain program in 2019 and began utilizing this program in 2020 to engage our suppliers on their GHG emissions and reduction plans. In 2020, we asked 161 suppliers to complete at least portions of the CDP Climate report, 123 or 76% responded to the questionnaire. Of the responders, 90 had emission reduction initiatives and 47 reported having SBTs.

### **Comment**

Scope 3 emissions for our distribution supplier network is included in section 6.5. This initiative is designed to capture Scope 3 emissions from the majority of our other suppliers.

## **C12.3**

**(C12.3) Do you engage in activities that could either directly or indirectly influence public policy on climate-related issues through any of the following?**

Trade associations

## C12.3b

**(C12.3b) Are you on the board of any trade associations or do you provide funding beyond membership?**

Yes

## C12.3c

**(C12.3c) Enter the details of those trade associations that are likely to take a position on climate change legislation.**

---

**Trade association**

CBA (Consumer Brands Association)

**Is your position on climate change consistent with theirs?**

Consistent

**Please explain the trade association's position**

YES, the CBA believes that there are environmental challenges posed by GHG emissions that contribute to climate change. The CBA believes that continued GHG emissions contribute to climate change. They have urged the US Senate to craft legislation to address these challenges.

**How have you influenced, or are you attempting to influence their position?**

We fund them via our membership dues. As a member organization, we actively participate on their staff working group on environmental sustainability.

---

**Trade association**

ACI (The American Cleaning Institute)

**Is your position on climate change consistent with theirs?**

Consistent

**Please explain the trade association's position**

YES, the ACI believes that there are environmental challenges posed by GHG emissions that contribute to climate change. The ACI believes that the majority of energy used in homes, commercial buildings, and industrial facilities that is generated by burning fossil fuels, emit GHG's that contribute to climate change. They also believe that significant GHG emission reductions are required to help decrease the negative impacts of climate change.

**How have you influenced, or are you attempting to influence their position?**

We fund them via our membership dues. We are an active member of their Sustainability Committee, and are one of the ACI member companies that calculate the environmental impact of our ACI related manufactured cleaning products as part of ACI's Industry Sustainability Report.

---

**Trade association**

NAM (National Association of Manufacturers)

**Is your position on climate change consistent with theirs?**

Inconsistent

**Please explain the trade association's position**

The NAM maintains a neutral position on Climate Change. The Clorox Company, on the other hand, is on record as believing that rising GHG emissions have a significant impact on climate change and the environment. Clorox therefore supports Congressional action on comprehensive national climate change legislation aimed at reducing aggregate emissions of greenhouse gas over time without causing undue hardships for the U.S. economy. The NAM (National Association of Manufacturers) has challenged the US EPA's (Environmental Protection Agency) GHG regulation and our position is not consistent with theirs.

**How have you influenced, or are you attempting to influence their position?**

We do not provide any funding beyond membership dues.

## C12.3f

**(C12.3f) What processes do you have in place to ensure that all of your direct and indirect activities that influence policy are consistent with your overall climate change strategy?**

In order to ensure that our policies are aligned with any research organizations, non-profit associations, agencies, consortiums or other industry groups, before engaging, our Senior Director of Corporate Social Responsibility and Sustainability will review their policies and goals to ensure alignment with our existing environmental policies and strategies. Should an organization participate in an activity that does not align with our climate strategy, or should there be a major change in our strategy which no longer aligns with that of these organizations, our Senior Director of Corporate Social Responsibility and Sustainability will revisit our membership and continued engagement with the organization and decide whether to continue our membership and affiliation.

Clorox works closely with a number of research organizations, non-profit associations, agencies and consortiums to further environmental sustainability initiatives within our company, industries and communities. Some of these are:

- The Sustainability Consortium - We are a TSC member. The TSC is a group of diverse stakeholders that work collaboratively to build science-based decision tools that address

sustainability issues that are materially important throughout a product's supply chain and lifecycle.

- Clorox is actively engaged with the EPA's Waste Wise program and EPA's Safer Choice program
  - GreenBiz – We are a corporate member of the GreenBiz Executive Network
  - Sustainable Brands – Clorox is a member of Sustainable Brands
  - Sustainable Packaging Coalition – We are an active member of this organization, as well as its How2Recycle recycling labelling program.
  - We are a member of AIM Progress - Responsible sourcing industry organization which aim to drive best practices in upstream supply chains
  - We are a member of the National Resources Stewardship Circle – Responsible sourcing industry organization which works to drive best practices in upstream supply chains, including deforestation and ingredient sourcing such as palm oil.
  - In 2015, Clorox joined the Roundtable on Sustainable Palm oil, a multi-stakeholder organization working to develop standards to ensure palm oil is sustainably grown and harvested.
  - In 2015, Clorox became a signatory of the UN Global Compact
    - In 2016, Clorox became a member of The Forest Trust (subsequently renamed to Earthworm Foundation), an international non-profit organization that works with companies – typically brands, retailers, manufacturers, and producers – to use their leverage within a supply chain to transform the way commodities, such as palm oil, are produced.
  - In 2019, Clorox became a signatory to the Ellen MacArthur Foundation's New Plastics Economy Global Commitment, a vision of a circular economy for plastic in which it never becomes waste or pollution.
  - In 2020, Clorox became a founding member of the U.S. Plastics Pact, a public-private led collaboration working to change the U.S. systems that produce, use, recover, and process plastics with solution-driven action
- With all the above organizations, besides paying annual membership dues, we do not specifically provide any other funding towards the study or research of climate change.

Our position on Climate Change is stated on our website -

## C12.4

**(C12.4) Have you published information about your organization's response to climate change and GHG emissions performance for this reporting year in places other than in your CDP response? If so, please attach the publication(s).**

---

### Publication

In mainstream reports, in line with the CDSB framework (as amended to incorporate the TCFD recommendations)

### Status

Underway – previous year attached

**Attach the document**

-  Clorox Independent Accountants Report - FY21 Phase I - Signed.pdf
-  Clorox\_2020\_Integrated\_Report.pdf

**Page/Section reference**

Reference entire Annual Report as an integrated business and corporate social responsibility report, 2020.  
 Pg 15 Ignite Strategy: Integrated ESG Goals  
 Pg 24 Planet and Community: Climate, Plastic, and Waste Goal progress.  
 Pg 37 Performance: Emissions, Energy, Water;  
 Pg 38 Water Management Data, SASBE Accounting Metrics  
 Pg 39 TCFD disclosures: Governance, Strategy, Risk, and Metrics & Targets.  
 Pg 40 Ten Principals of United Nations Global Compact - Environment: Nos. 7, 8, and 9.

**Content elements**

- Governance
- Strategy
- Risks & opportunities
- Emissions figures
- Emission targets
- Other metrics

**Comment**

## C15. Signoff

### C-FI

**(C-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.**

### C15.1

**(C15.1) Provide details for the person that has signed off (approved) your CDP climate change response.**

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

## SC. Supply chain module

### SC0.0

**(SC0.0) If you would like to do so, please provide a separate introduction to this module.**

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.

Our commitment to environmental sustainability shows up in all parts of our business every day. Since 2008, we've made it a top priority to go beyond environmental compliance and begin a long-term journey to reduce the footprint of our operations, improve the sustainability of our products and packaging, and enhance the transparency and sustainability progress in our upstream supply chain, which involves ingredients and materials that go into our products and packaging.

In 2019, as part of our [IGNITE strategy](#), we unveiled an ambitious set of new environmental goals to advance our progress in this area. These goals, known as our IGNITE ESG planet goals, build on our previous 2020 strategy and call for us to demonstrate leadership in plastic and other waste reduction and science-based climate action, as we continue to uphold our commitments to water stewardship, responsible sourcing and other material reduction innovations to reduce material, water, and transportation footprints of our products during consumer use and at the end of life.

Our IGNITE ESG goals include climate focused commitments such as science-based climate action cross our value-chain (e.g. Science Based Targets), 100% renewable electricity in our US and Canada operations, zero-waste-to-landfill in our global facilities, and 50% combined reduction in virgin plastic and fiber packaging. As we pursue these goals, Clorox is also

committed to driving efficiency improvements that minimize our use of energy and water and generation of waste in our global operations.

To accelerate our progress and drive Purpose Driven Growth – growth that’s profitable, sustainable and responsible – we’ve also re-imagined how we work to drive sustainability deeper into our brands and organization. With a business-led vision for sustainability, enabled by our passionate Sustainability Center, and activated by all employees across the company, sustainability is embedded into all aspects of our business and is everyone’s responsibility.

Clorox’s integrated IGNITE Strategy puts environmental, social and governance priorities at the forefront of our decision-making to ensure Clorox remains a leader in corporate responsibility.

## SC0.1

**(SC0.1) What is your company’s annual revenue for the stated reporting period?**

	Annual Revenue
Row 1	7,524,000,000

## SC0.2

**(SC0.2) Do you have an ISIN for your company that you would be willing to share with CDP?**

No

## SC1.1

**(SC1.1) Allocate your emissions to your customers listed below according to the goods or services you have sold them in this reporting period.**

### Requesting member

Walmart, Inc.

### Scope of emissions

Scope 1

### Allocation level

Company wide

### Allocation level detail

### Emissions in metric tonnes of CO2e

16,160

### Uncertainty (±%)

1

### Major sources of emissions

Emissions from the use of Natural Gas and other stationary and mobile fuel sources

**Verified**

Yes

**Allocation method**

Allocation based on the volume of products purchased

**Please explain how you have identified the GHG source, including major limitations to this process and assumptions made**

GHG emissions were obtained based on % of dollar sales to WM USA (including Sam's Club-USA). Percentage was multiplied by total Scope 1 emissions, assumes product sales are proportionally equivalent emissions from each business unit.

---

**Requesting member**

Walmart, Inc.

**Scope of emissions**

Scope 2

**Allocation level**

Company wide

**Allocation level detail**

**Emissions in metric tonnes of CO2e**

39,642

**Uncertainty (±%)**

1

**Major sources of emissions**

Secondary emissions from our electricity consumption

**Verified**

Yes

**Allocation method**

Allocation based on the volume of products purchased

**Please explain how you have identified the GHG source, including major limitations to this process and assumptions made**

GHG emissions were obtained based on % of dollar sales to WM USA (including Sam's Club-USA). Percentage was multiplied by total Scope 2 emissions, assumes product sales are proportionally equivalent emissions from each business unit.

---

**Requesting member**

Walmart, Inc.

**Scope of emissions**

Scope 3

**Allocation level**

Company wide

**Allocation level detail**

**Emissions in metric tonnes of CO2e**

79,584

**Uncertainty (±%)**

1

**Major sources of emissions**

Scope 3 emissions include business travel and upstream transportation of finished goods.

**Verified**

Yes

**Allocation method**

Allocation based on the volume of products purchased

**Please explain how you have identified the GHG source, including major limitations to this process and assumptions made**

GHG emissions were obtained based on % of dollar sales to WM USA (including Sam's Club-USA). Percentage was multiplied by total Scope 3 emissions, assumes product sales are proportionally equivalent emissions from each business unit.

---

**Requesting member**

Wal Mart de Mexico

**Scope of emissions**

Scope 1

**Allocation level**

Company wide

**Allocation level detail**

**Emissions in metric tonnes of CO<sub>2</sub>e**

225

**Uncertainty (±%)**

1

**Major sources of emissions**

Emissions from the use of Natural Gas and other stationary and mobile fuel sources

**Verified**

Yes

**Allocation method**

Allocation based on the volume of products purchased

**Please explain how you have identified the GHG source, including major limitations to this process and assumptions made**

GHG emissions were obtained based on % of dollar sales to WM Mexico (incl. Sam's Club Mexico). Percentage was multiplied by total Scope 1 emissions, assumes product sales are proportionally equivalent emissions from each business unit.

Note: Scope 3 emissions are not calculated for our International locations.

---

**Requesting member**

Wal Mart de Mexico

**Scope of emissions**

Scope 2

**Allocation level**

Company wide

**Allocation level detail**

**Emissions in metric tonnes of CO<sub>2</sub>e**

553

**Uncertainty (±%)**

1

**Major sources of emissions**

Secondary emissions from our electricity consumption

**Verified**

Yes

**Allocation method**

Allocation based on the volume of products purchased

**Please explain how you have identified the GHG source, including major limitations to this process and assumptions made**

GHG emissions were obtained based on % of dollar sales to WM Mexico (incl. Sam's Club Mexico). Percentage was multiplied by total Scope 2 emissions, assumes product sales are proportionally equivalent emissions from each business unit.

Note: Scope 3 emissions are not calculated for our International locations.

---

**Requesting member**

Target Corporation

**Scope of emissions**

Scope 1

**Allocation level**

Company wide

**Allocation level detail**

**Emissions in metric tonnes of CO<sub>2</sub>e**

4,359

**Uncertainty (±%)**

1

**Major sources of emissions**

Emissions from the use of Natural Gas and other stationary and mobile fuel sources

**Verified**

Yes

**Allocation method**

Allocation based on the volume of products purchased

**Please explain how you have identified the GHG source, including major limitations to this process and assumptions made**

GHG emissions were obtained based on % of dollar sales to Target. Percentage was multiplied by total Scope 1 emissions, assumes product sales are proportionally equivalent emissions from each business unit.

---

**Requesting member**

Target Corporation

**Scope of emissions**

Scope 2

**Allocation level**

Company wide

**Allocation level detail**

**Emissions in metric tonnes of CO<sub>2</sub>e**

10,694

**Uncertainty (±%)**

1

**Major sources of emissions**

Secondary emissions from our electricity consumption

**Verified**

Yes

**Allocation method**

Allocation based on the volume of products purchased

**Please explain how you have identified the GHG source, including major limitations to this process and assumptions made**

GHG emissions were obtained based on % of dollar sales to Target. Percentage was multiplied by total Scope 2 emissions, assumes product sales are proportionally equivalent emissions from each business unit.

---

**Requesting member**

Target Corporation

**Scope of emissions**

Scope 3

**Allocation level**

Company wide

**Allocation level detail**

**Emissions in metric tonnes of CO<sub>2</sub>e**

21,469

**Uncertainty (±%)**

1

**Major sources of emissions**

Scope 3 emissions include business travel and upstream transportation of finished goods

**Verified**

Yes

**Allocation method**

Allocation based on the volume of products purchased

**Please explain how you have identified the GHG source, including major limitations to this process and assumptions made**

GHG emissions were obtained based on % of dollar sales to Target. Percentage was multiplied by total Scope 3 emissions, assumes product sales are proportionally equivalent emissions from each business unit.

---

**Requesting member**

Ahold Delhaize

**Scope of emissions**

Scope 1

**Allocation level**

Company wide

**Allocation level detail**

**Emissions in metric tonnes of CO<sub>2</sub>e**

752

**Uncertainty (±%)**

1

**Major sources of emissions**

Emissions from the use of Natural Gas and other stationary and mobile fuel sources

**Verified**

Yes

**Allocation method**

Allocation based on the volume of products purchased

**Please explain how you have identified the GHG source, including major limitations to this process and assumptions made**

GHG emissions were obtained based on % of dollar sales to Ahold Delhaize. Percentage was multiplied by total Scope 1 emissions, assumes product sales are proportionally equivalent emissions from each business unit.

---

**Requesting member**

Ahold Delhaize

**Scope of emissions**

Scope 2

**Allocation level**

Company wide

**Allocation level detail**

**Emissions in metric tonnes of CO2e**

1,844

**Uncertainty (±%)**

1

**Major sources of emissions**

Secondary emissions from our electricity consumption

**Verified**

Yes

**Allocation method**

Allocation based on the volume of products purchased

**Please explain how you have identified the GHG source, including major limitations to this process and assumptions made**

GHG emissions were obtained based on % of dollar sales to Ahold Delhaize. Percentage was multiplied by total Scope 1 emissions, assumes product sales are proportionally equivalent emissions from each business unit.

---

**Requesting member**

Ahold Delhaize

**Scope of emissions**

Scope 3

**Allocation level**

Company wide

**Allocation level detail**

**Emissions in metric tonnes of CO2e**

3,702

**Uncertainty (±%)**

1

**Major sources of emissions**

Scope 3 emissions include business travel and upstream transportation of finished goods.

**Verified**

**Allocation method**

Allocation based on the volume of products purchased

**Please explain how you have identified the GHG source, including major limitations to this process and assumptions made**

GHG emissions were obtained based on % of dollar sales to Ahold Delhaize. Percentage was multiplied by total Scope 1 emissions, assumes product sales are proportionally equivalent emissions from each business unit.

**SC1.2**

**(SC1.2) Where published information has been used in completing SC1.1, please provide a reference(s).**

**SC1.3**

**(SC1.3) What are the challenges in allocating emissions to different customers, and what would help you to overcome these challenges?**

Allocation challenges	Please explain what would help you overcome these challenges
Diversity of product lines makes accurately accounting for each product/product line cost ineffective	Emissions attributable to requesting customers have been computed based on % sales to requesting customers. Conducting a life cycle analysis for each business and major product line might allow us to allocate emissions based on product unit (e.g. stat case). The next step would be to correlate sales data, by product, to the customer. The challenge is that this methodology might not tie directly back to emissions collected at the plant level, especially if the energy profile changes (and the Life Cycle data becomes dated).
Customer base is too large and diverse to accurately	Emissions attributable to requesting customers have been computed based on % sales to requesting customers. Using life cycle analysis

track emissions to the customer level	data might enable us to correlate emissions based on product line sales. However, YOY variability in customer base and diversity could lead to large fluctuations in the reported emissions and potentially high levels of uncertainty.
---------------------------------------	---

## SC1.4

**(SC1.4) Do you plan to develop your capabilities to allocate emissions to your customers in the future?**

No

## SC1.4b

**(SC1.4b) Explain why you do not plan to develop capabilities to allocate emissions to your customers.**

Customer base and product lines are too large and diverse to accurately and efficiently track emissions at the customer level. We believe using % sales to allocate emissions to customer level provides a reasonable and sufficient proxy. It also provides more consistency in the data for our suppliers' use.

## SC2.1

**(SC2.1) Please propose any mutually beneficial climate-related projects you could collaborate on with specific CDP Supply Chain members.**

## SC2.2

**(SC2.2) Have requests or initiatives by CDP Supply Chain members prompted your organization to take organizational-level emissions reduction initiatives?**

No

## SC4.1

**(SC4.1) Are you providing product level data for your organization's goods or services?**

No, I am not providing data

## Submit your response

**In which language are you submitting your response?**

English

**Please confirm how your response should be handled by CDP**

	<b>I am submitting to</b>	<b>Public or Non-Public Submission</b>	<b>Are you ready to submit the additional Supply Chain questions?</b>
I am submitting my response	Investors Customers	Public	Yes, I will submit the Supply Chain questions now

**Please confirm below**

I have read and accept the applicable Terms