



## The Clorox Company

### Modern Slavery Act & Supply Transparency Statement

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

This statement applies to all of Clorox's operations and is being made in accordance with the UK Modern Slavery Act, Australian Modern Slavery Act, and California Transparency in Supply Chains Act. It has been approved by the board of directors and signed by at least one director of The Clorox International Company, Cbee (Europe) Limited, Clorox Holding Pty Limited, and Clorox Australia Pty Limited.

#### Clorox Business

The Clorox Company is a leading multinational manufacturer and marketer of consumer and professional products with about 9,000 employees worldwide and fiscal year 2021 net sales of \$7.3 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 grilling products, Hidden Valley dressings and sauces, Brita water-filtration products, Burt's Bees natural personal care products, and RenewLife, Rainbow Light, Natural Vitality CALM, and NeoCell 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 to the United Nations Global Compact and the Ellen MacArthur Foundation's New Plastics Economy Global Commitment. Clorox is committed to ensuring that its manufacturing facilities around the world comply with, and often exceed, what is required by applicable laws. The Company is clear about its expectations in the areas of human rights and labor, anti-corruption, the environment, respectful treatment and equal opportunity, health and safety as well as business conduct and ethics, which are consistent with the Ten Principles of the UNGC, and outlined in the Clorox Human Rights Commitment publicly disclosed on our website.

For the purposes of this statement, Cbee (Europe) Limited is the local operating company in the UK within the Clorox group, Clorox Holdings Pty Limited is the local holding company in Australia within the Clorox group, and Clorox Australia Pty Limited is the local operating company in Australia within the Clorox group. These companies are registered pursuant to local requirements. Clorox Holdings Pty Limited is a holding company that holds the assets of Clorox Australia Pty Limited. Cbee (Europe) Limited and Clorox Australia Pty Limited's principal activity includes the distribution and marketing of a range of well-known branded consumer and professional goods to customers, as sourced from Clorox manufacturing facilities or overseas business partners. To prepare this joint statement, Clorox engaged and consulted with the relevant entities, including the reporting entities covered by this statement.



## Clorox Supply Chain

The Company purchases products, such as raw materials, processed ingredients, packaging and contract manufactured goods, from numerous domestic and international suppliers, some of which provide sole-sourced or single-sourced goods. The Company generally utilizes supply contracts to help ensure availability and a number of forward-purchase contracts to help reduce the volatility of the pricing of goods and services needed in its operations.

To address risks of modern slavery, the Company sets expectations and standards, works with its business partners to assess whether they meet those expectations, holds regular discussions with suppliers (and site visits, where possible) and seeks third party certified ingredients where applicable and feasible to ensure engagement on modern slavery issues. In addition to the above, Clorox's system for compliance includes its policy and approach to human rights as explained in this modern slavery statement, its Code of Conduct and associated information and training, the implementation and its engagement with suppliers to promote compliance with the Company's Business Partner Code of Conduct, the Clorox Compliance Hotline and Responsible Sourcing and Sustainability Program.

## Clorox Code of Conduct

Clorox has a Code of Conduct ("Clorox Code") that describes Clorox's expectation that the Company and its employees recognize and promote human rights on a global basis. Grounded in the United Nations Global Compact and International Labor Organization Declaration on Fundamental Principles and Rights at Work, the Clorox Code states that Clorox does not condone the exploitation, physical punishment, abuse, trafficking or involuntary service of children and others and prohibits the use of forced or illegal labor.

Clorox proactively communicates its Code and compliance program to employees through various methods, including but not limited to providing employees with regular training regarding compliance with the Clorox Code (including segments on modern slavery) together with information on the company's corporate intranet, posters, flyers and periodic awareness campaigns. Managers are encouraged to have regular discussions with those under their supervision about the Clorox Code and Clorox policies and the importance of compliance. The Clorox Code is also publicly available on Clorox's website.

## Clorox Business Partner Code of Conduct

Clorox also has a Business Partner Code of Conduct ("Business Partner Code") available on its website and provided in bilateral discussions and contractual terms that addresses business practices of third-party business partners, including suppliers, distributors, consultants, joint ventures, licensees, and other business partners ("Business Partners"). The Business Partner Code contains specific provisions addressing the issues of human rights and labor. Among other guidance, the Business Partner Code makes clear that Business Partners must evaluate and address risks of human trafficking and slavery and not produce goods or services using forced, bonded, indentured, involuntary convict or compulsory labor, and comply with applicable laws.

Clorox expects Business Partners to adhere to the principles of the Business Partner Code, and strives to ensure its strategic Business Partners are in compliance with its principles through agreement or certification (either in a contract and/or a Business Partner Code self-certification form) and/or by assessing their public commitments, codes and policies. Business Partners are expected to designate management



staff to monitor their factories, production facilities, business operations and their compliance with the Business Partner Code. Clorox's supply agreements also contain representations that Business Partners are in compliance with all applicable federal, state and/or provincial, regional, municipal, and local laws, codes, regulations, rules, ordinances, decrees, permits, registrations and orders, which include laws addressing human trafficking and slavery. In addition, Clorox and/or designated third-parties may visit and assess Business Partners to ensure compliance with the Business Partner Code, including but not limited to compliance with the prohibition on slavery and human trafficking. Clorox also requires in the Business Partner Code that materials incorporated into Clorox's products comply with the laws regarding slavery and human trafficking of the country or countries in which they are doing business.

Clorox also has a Responsible and Sustainable Sourcing Policy that translates the Business Partner Code into specific requirements for suppliers. It is accompanied by three standards focused on responsible sourcing, sustainable sourcing of raw materials, and carbon reduction in the supply chain.

### Clorox Compliance Hotline

Clorox operates a confidential hotline ("Compliance Hotline") administered by a third party that, where permissible under local laws, is available to all employees, directors and contractors, as well as Business Partners and their employees or subcontractors.

The Compliance Hotline allows individuals to report suspected illegal or unethical behavior, including suspected issues of slavery or human trafficking in either Clorox's own business or its supply chains. Contact details are provided in the Clorox Code and Business Partner Code, including international toll free hotline numbers for numerous jurisdictions, including the UK and Australia.

Clorox encourages individuals to report potential issues to assist it in promptly identifying any potential risks in its supply chain. Clorox also offers individuals several channels to do so, including by reporting to their manager, Human Resources, or Legal Services at Clorox or anonymously through the Compliance Hotline. Clorox employees who do not act promptly to report noncompliance matters may be subject to disciplinary action. As stated in the Clorox Code and the Business Partner Code, Clorox strictly prohibits retaliation against anyone who in good faith reports suspected misconduct. All anonymized Compliance Hotline reports are made available to senior leadership, including the Clorox board of directors.

The Company investigates these reports, including reports of potential modern slavery, and addresses remediation, as appropriate.

### Responsible and Sustainable Sourcing Program

Finally, as part of its Responsible and Sustainable Sourcing program, Clorox evaluates (and may use third parties to evaluate) its supply chains for risk, including as to modern slavery. For example, in the UK, Australia, and other countries, third party manufacturers or suppliers are identified in consultation with legal, procurement, and other applicable controls teams. Such partners undergo diligence checks, training, and/or a review of contractual commitments as necessary and appropriate.

When conducting supplier diligence, Clorox uses a technology solution to continuously monitor global suppliers and certain other Business Partners to ensure automated detection and alerts in real time of supply chain risks, including human rights and labor practices.



Clorox has conducted targeted training for its product supply leadership, internal team members with direct responsibility for supply chain management, and select Business Partners to identify and address risks of slavery and trafficking in its supply chain.

In addition to information monitoring, Clorox supports its Business Partner Code with site visits, self-assessments and third-party audits. Clorox is an active member and on the leadership team of AIM-Progress, an organization focused on identifying emerging issues and ensuring respect for human rights in supply chains. Clorox is also a member of Sedex through which select Business Partners are engaged to complete the Sedex Self-Assessment Questionnaires and on-site Sedex Members Ethical Trade Audits. Clorox and other AIM-Progress members support mutual recognition platforms for audits to encourage its Business Partners to focus on remediation and improvements. In the event concerns arise, Clorox will investigate the matter and take appropriate actions to address the issue.

A Business Partner's ability to meet or exceed these standards is taken into account by Clorox when making procurement decisions and deciding whether to continue working with Business Partners. Where suppliers are not able to satisfy Clorox that they have appropriate risk management controls in place, the Company may take further action, such as engaging supplier senior management, implementing a remediation plan or suspending services.

### Continuous Improvement

As a Company, Clorox continues to monitor the effectiveness of its programs to manage the risks of modern slavery through the supply chain.

For example, the worldwide Covid-19 pandemic began towards the end of the 2020 fiscal year, and continues at the time of publication. Clorox continues to evaluate whether the pandemic could alter its modern slavery and human trafficking risks. Clorox also endeavours to work with non-governmental agencies, such as ingredients supply oversight bodies, and intermediary suppliers to affect improvements in complex indirect global supply chains where Clorox lacks direct relationships.

Clorox is committed to continuous improvement and will continue monitoring for further legislative or regulatory development and reviewing and enhancing its programs and policies to account for applicable laws or business circumstances. Clorox will also continue focusing on the engagement of Business Partners, and monitoring complaints made to applicable regulatory organization as well as through the Clorox Compliance Hotline.

Clorox will continue to report on progress on an annual basis.

**Modern Slavery Act & Supply Transparency Statement**

**Signatures**



Date: 12/17/2021

Iké Adeyemi, Director

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



Date: 12/20/2021

Felipe Eduardo Toledo Acuña, Director

Signed following approval by Clorox Australia Pty Ltd Company Board of Directors.

Signed following approval by Clorox Holding Pty Limited Company Board of Directors.



Date: 12/20/2021

Giles Malone, Director

Signed following approval by Cbee (Europe) Limited Board of Directors.