



2021 Code of Conduct

A Message from
Linda Rendle
Chief Executive Officer

Do The Right Thing.

This core value has been part of Clorox since our founding in 1913. It's the foundation of our long-term success and one of the reasons I love this company.

As a health and wellness company, Clorox makes a meaningful difference in people's lives. We take seriously the trust people place in us, and we know that how we operate means as much as the products and experiences we create.

That's why our Code of Conduct is so important. It's a living document, approved annually by our Board of Directors, that lays out our legal and ethical responsibilities. It establishes how we should act in a wide variety of situations so no one ever needs to wonder what it means to do the right thing.

Each of us has a responsibility to follow our Code of Conduct. It's a promise we make every day to each other and to our shareholders, business partners, consumers, customers, suppliers and communities. Given how central it is to our success, we require annual training on the Code of Conduct for all team members.

Each of us also has a responsibility to speak up and report any violation of our Code of Conduct or Clorox policies. We'll investigate every report of misconduct and prohibit retaliation against any individual who reports suspected misconduct.

Please take time to read and understand our Code of Conduct. Apply it to your work. In so doing, you help Clorox remain a company rooted in integrity and trust, which is a source of pride for all of us. Thank you for living our Clorox values as we champion people to be well and thrive – every single day.

Linda Rendle
Chief Executive Officer

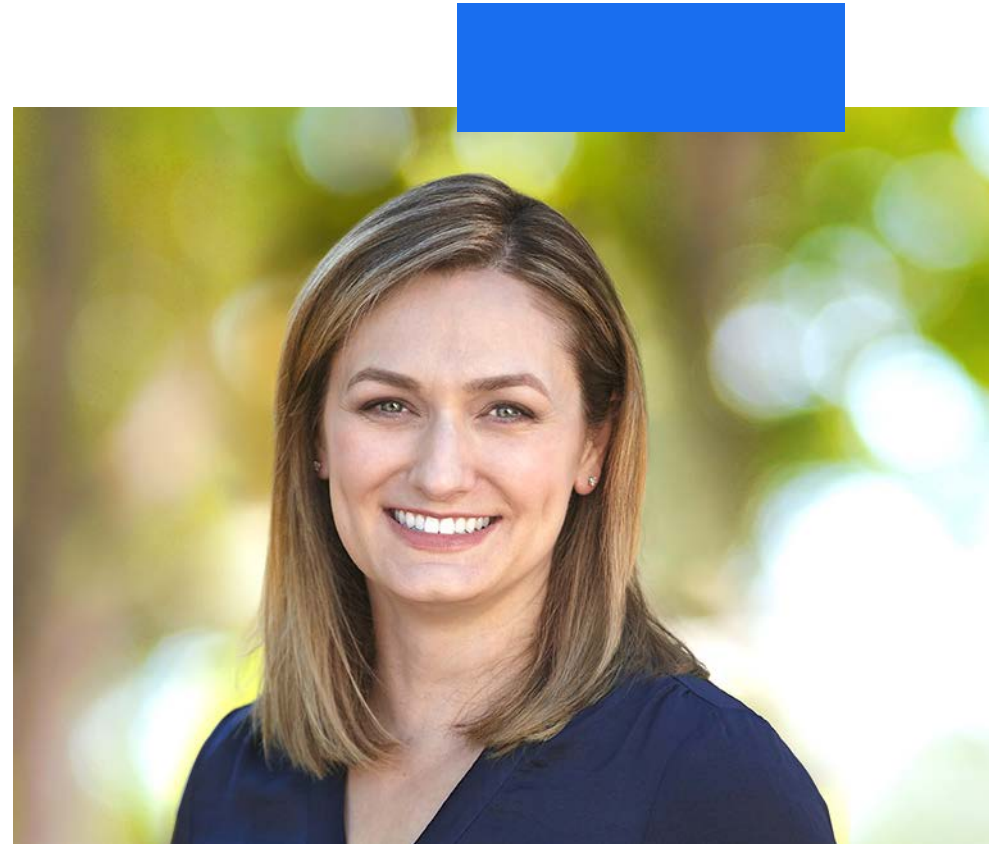


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Our Core Values

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We exercise honesty and fairness in everything we do

2 Corporate Opportunities:

We always act in the best interest of Clorox, not for personal profit

3 Prohibited Stock Transactions:

We do not engage in prohibited stock transactions

4 **Corruption and Bribery:** We refuse to give or receive bribes or otherwise make inappropriate payments regardless of where we are located or with whom we do business

5 **Gifts, Meals and Entertainment:** We know and follow the Clorox gifts and entertainment standards and do not accept or give inappropriate gifts or hospitality

6 **Political Contributions:** We do not use Clorox funds or assets on behalf of a political party or candidate, except as expressly approved by Clorox

7 **Public Disclosure:** We are accurate and timely in our communications about our business performance

8 **Protection and Proper Use of Clorox Assets:** We use technology and company resources responsibly

9 **Insider Trading:** We appropriately and lawfully comply with insider trading laws

10 **Use of Intellectual Property and Proprietary Information:** We are responsible for protecting the intellectual property and protected information entrusted to us

11 **Use, Security and Monitoring of Systems:** We follow all Clorox information technology security standards and procedures

12 **Antitrust and Competition Laws:** We comply with antitrust and fair competition laws

13 **Interference with an Audit:** We cooperate with all audit requests

14 **Conflicts of Interest:** We avoid conflicts of interest or even the appearance of a conflict

15 **Confidential Information and Privacy:** We take the appropriate steps to safeguard confidential information and trade secrets

16 **Workplace Behavior:** We value and promote both equal employment opportunity and inclusion, and do not tolerate discrimination, intimidation or harassment

17 **Inclusion and Diversity:** We welcome employees and business partners with diverse experiences and backgrounds

18 **Treatment of Employees and Others:** We respect each other and maintain fairness in relationships

19 **Relationships with Business Partners** (including Distributors, Suppliers, Consultants and Others): We engage in fair and ethical dealings

20 **Clorox Records and Money:** We are responsible for the accuracy of our records and financial statements

21 **Records Management:** We manage business records in accordance with applicable retention requirements

22 **Responsible Marketing:** We market and advertise our products responsibly and strive to provide consumers with accurate, reliable and transparent information about our products

23 Social Media and Other

Online Activity: We are responsible in our use of social media

24 Environmental, Health and Safety Laws and Regulations, and Working

Conditions: We maintain a safe and healthy work environment

25 Product Safety:

Consumer safety is a top priority

26 Employee Freedom of Association:

We recognize our employees' right to freely associate

27 **Human Rights:** We recognize and promote human rights on a global basis

28 Money Laundering and

Terrorist Financing: We do not engage in money laundering or terrorist financing

29 Global Trade – Export Controls, Restricted Countries, Imports

and Boycotts: We follow and abide by applicable global trade laws

30 **Working Hours:** We follow and abide by applicable laws for working hours, wages and benefits



/ 2021 CODE OF CONDUCT /

Why We Have a Code and What It Means to All of Us





Personal Integrity: The Foundation of Corporate Integrity

Each of us is personally responsible for supporting our core values, which require compliance with the law as well as ethical conduct. Clorox is strongly committed to doing business ethically and in compliance with all applicable laws. We have policies, processes and training in place to support ethical and legal decision making.

Personal integrity, practiced on a daily basis, is the foundation of corporate integrity. Our ethical and legal standards of conduct are rooted in the Clorox Code of Conduct (this “Code”). This Code defines what we can expect from each other and guides how we report and handle alleged violations of these standards.

Our Code applies to us all. We are all expected to act with uncompromising honesty and integrity at all times. We must demand of ourselves and of each other the highest standards of individual and corporate integrity. Each of us, including our Chief Executive Officer and other executive officers, directors, and employees of Clorox or any of our wholly owned subsidiary companies worldwide (collectively “Clorox”), is required to strictly abide by our Code, our policies and applicable laws that apply to business activities on behalf of Clorox.

Additionally, we have a [Business Partner Code of Conduct](https://www.thecloroxcompany.com/wp-content/uploads/clorox-business-partner-code-of-conduct.English.pdf) that outlines standards and expectations of our business partners (including our distributors, suppliers, consultants joint ventures, and any other person working on behalf of Clorox), which can be found at <https://www.thecloroxcompany.com/wp-content/uploads/clorox-business-partner-code-of-conduct.English.pdf>. We expect our business partners to demonstrate high standards of ethical business conduct.

It is Clorox policy to conduct our business in accordance with the applicable laws of the United States and other jurisdictions in which we do business and with high ethical standards of business practices. In many instances, our Code commits us to follow a higher standard of ethical conduct than what is required by law. Employees and directors will, at a minimum, abide by both applicable laws and the standards of

conduct in this Code. The Clorox Board of Directors is the only party who may waive any part of this Code, always acting within the scope of applicable law. Waivers for executive officers and directors will be publicly disclosed.

To remind us about our obligations under our Code, we are all annually required to complete training and a questionnaire about compliance with our Code’s principles, including the principles of our Human Rights Commitment. Our Senior Vice President and Chief Legal Officer is responsible for providing our Code to our directors for review and approval. Managers are expected to have regular discussions about our Code and encourage everyone under their supervision to comply with our Code and Clorox policies. Our Code is also publicly available at <https://www.thecloroxcompany.com/who-we-are/corporate-governance/codes-of-conduct/>.

Our Code sets forth the fundamental principles and some of the key policies and procedures that govern Clorox’s business. It is not a complete compilation of all company guidelines or policies. We are expected to know and comply with all company guidelines or policies, whether or not reflected in the Code.

Ethical Role Models: Leaders’ and Managers’ Responsibilities

Leaders and managers are expected to serve as ethical role models for everyone by exemplifying the Clorox values and leadership traits at all times. If you are a Clorox leader or manager, you have a special responsibility to lead with integrity and take affirmative steps to influence your team members and others doing work on behalf of Clorox with whom you interact to do the same. This requires a visible commitment to promote ethical conduct and communicate the importance of our Code.

Leaders and managers must strive to create a positive work environment in which everyone feels comfortable asking for help and raising concerns about compliance with the Code and company policies in accordance with the directions set forth in this Code. Leaders must also be alert to any situations or actions that may violate the letter or spirit of the Code, violate a Clorox policy or potentially damage Clorox’s reputation. It is important to act quickly to address such situations. When leaders and managers receive reports of a situation that is unethical, illegal or potentially damaging to Clorox’s reputation, or suspect that one exists, they should promptly notify appropriate personnel and work to resolve the issue, as described in this Code.

OUR CODE APPLIES TO ALL OF US

We are all expected
to act with
uncompromising
honesty and
integrity at all times.





MAKING AN IMPACT

Create a positive work environment in which everyone feels comfortable.

Leaders and managers who know about, or should know about, misconduct and do not act promptly to report and correct the situation will be subject to disciplinary action. Leaders and managers who suspect or receive reports of potential noncompliance with our Code should not perform any investigative or other follow-up steps on their own. Leaders and managers who become aware of suspected misconduct should not contact the person suspected of the misconduct and should immediately follow the Clorox reporting guidelines to ensure that a complete and proper investigation takes place promptly. Leaders and managers must not retaliate or tolerate retaliatory acts against Clorox employees or business partners who in good faith report an alleged violation of our Code, Clorox policies or the law to Clorox or the government, and leaders and managers are expected to clearly communicate to others our “no retaliation” policy, as set forth in this Code.

Discipline for Code of Conduct Violations

Subject to applicable law, individuals who violate our Code and Clorox policies are subject to appropriate discipline. Disciplinary measures will vary depending on the seriousness of the violation and individual circumstances. Possible disciplinary sanctions include, but are not limited to, written warnings, suspension and termination. In appropriate circumstances, Clorox will consider taking legal action or referring matters to public law enforcement authorities for possible prosecution.

/ 2021 CODE OF CONDUCT /

Speaking Up: Asking for Guidance and Voicing Concerns

2.

We Each Have a Responsibility to Ask Questions

We have a responsibility to ourselves, our co-workers and Clorox to conduct business legally and ethically. We should be alert to activities going on around us and speak up if we suspect illegal or unethical conduct by any Clorox employee, contractor, vendor, supplier, director, customer or other person working for or on behalf of Clorox.

Sometimes, it might seem easier to “look the other way,” but doing nothing is, in itself, an action that can have serious consequences for us as individuals and for Clorox. Participation and commitment to monitoring the integrity of our business conduct is instrumental in sustaining our ethical culture. If we do not speak up, Clorox cannot address the problem.

No code of conduct can cover every business situation that may require an ethical or legal decision. Consequently, if we suspect that someone is behaving illegally or unethically, each of us is responsible for seeking guidance regarding our Code, Clorox policies and applicable laws when necessary. Speaking up and seeking advice is not a responsibility that can be delegated to others. If we have questions about the law, our Code or our policies, or if we face situations not specifically addressed in our Code, we should seek advice from our manager or local supervisor, Human Resources or Legal Services before taking any action.

Clorox Legal Services

The Clorox Company, 1221 Broadway, Oakland, CA 94612-1888

Vice President – Compliance & Associate
General Counsel

Rachel Barack

(310) 472-2871

rachel.barack@clorox.com

Senior Vice President
Chief Legal Officer

Angela Hilt

(510) 271-7021

angela.hilt@clorox.com

Additionally, anyone may contact the Clorox Compliance Hotline with questions about business conduct or to report concerns.



Reporting Misconduct

If we suspect that someone is behaving illegally or unethically, in a manner that does not comply with our values or expectations (including infringements on human rights), or that an actual or potential violation of the Code or Clorox policy has occurred, each of us is responsible for reporting it according to our Clorox reporting procedures:

A. We should immediately bring it to the attention of our local supervisor or any member of local management, as appropriate. Reports can also be made to Human Resources or Legal Services.

B. If for any reason there is discomfort bringing the concern to a local supervisor, local management, Human Resources or Legal Services, or if it is felt that the concern has not been adequately addressed, reports may be made through the Clorox Compliance Hotline, a confidential hotline administered by an outside third party, using the contact information provided below.

Compliance Hotline

Clorox Company Compliance, PMB 3767
13950 Ballantyne Corporate Place
Charlotte, NC 28277 USA
1-888-9CLOROX (1-888-925-6769)
<http://www.cloroxhotline.com>

Telephone Numbers:

United States, Canada and Puerto Rico:

1-888-9CLOROX (1-888-925-6769)

The following countries have local direct dial numbers for the Hotline:

Argentina:	0800-555-1352
Australia:	1-800-08-7065
China:	400-882-2048
Colombia:	01-800-912-0580
Dominican Republic (collect call)	1-704-526-1175
Hong Kong:	800-96-1701
Malaysia:	1-800-81-8498
Mexico:	001-877-978-0052
New Zealand:	050-853-6017
Saudi Arabia:	800-850-0372
South Africa:	800-44-4460
United Kingdom & Northern Ireland:	0808-234-3903

Two-step toll-free dialing is used for these countries:

Chile:	Step 1: 800-800-288;	Step 2: 888-925-6769
Costa Rica:	Step 1: 800-228-8288;	Step 2: 888-925-6769
Ecuador:	Step 1: 1-800-225-528;	Step 2: 001-888-925-6769
Egypt:	Step 1: 2510-0200 or 02-2510-0200;	Step 2: 888-925-6769
Germany:	Step 1: 0-800-225-5288;	Step 2: 888-925-6769
Korea:	Step 1: 00-309-11;	Step 2: 888-925-6769
Panama:	Step 1: 800-0109;	Step 2: 888-925-6769
Peru:	Step 1: 0-800-50-288;	Step 2: 888-925-6769
Philippines:	Step 1: 1010-5511-00;	Step 2: 888-925-6769
Spain:	Step 1: 900-99-0011;	Step 2: 888-925-6769
United Arab Emirates:	Step 1: 8000-021 or 8000-555-66;	Step 2: 888-925-6769
Uruguay:	Step 1: 000-410;	Step 2: 888-925-6769

Employees calling from all other countries should consult the international toll-free number with the calling card dialing instructions listed on ClxHub.

C. In addition to the reporting mechanisms described above, if the misconduct relates to an accounting, financial, banking, internal control, auditing, bribery, anti-corruption or antitrust/competition matter, we may directly contact Ivor Nanton, Vice President – Internal Audit, any auditor in the Clorox Internal Audit department or any attorney in Legal Services.

Vice President – Internal Audit

Ivor Nanton

The Clorox Company
1221 Broadway
Oakland, CA 94612-1888
(510) 207-1692
ivor.nanton@clorox.com

D. Potential business misconduct may also be reported to the Nominating and Governance Committee of the Board of Directors or, if the report relates to an accounting, internal control or auditing matter, to the Audit Committee of the Board of Directors.

Clorox Compliance Hotline

Reports of potential misconduct
can be made directly to your manager, Human Resources or Legal Services,
or by anonymously contacting the Compliance Hotline.

HOW TO REPORT



Online

cloroxhotline.com



Mail

Clorox Company Compliance, PMB 3767
13950 Ballantyne Corporate Place
Charlotte, NC 28277, USA



Phone

Listings per Location

Telephone Numbers:

United States, Canada and Puerto Rico:

1-888-9CLOROX (1-888-925-6769)

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China:	400-882-2048
Colombia:	01-800-912-0580
Dominican Republic (collect call)	1-704-526-1175
Hong Kong:	800-96-1701
Malaysia:	1-800-81-8498
Mexico:	001-877-978-0052
New Zealand:	050-853-6017
Saudi Arabia:	800-850-0372
South Africa:	800-44-4460
United Kingdom & Northern Ireland:	0808-234-3903

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Costa Rica:	Step 1: 800-228-8288;	Step 2: 888-925-6769
Ecuador:	Step 1: 1-800-225-528;	Step 2: 001-888-925-6769
Egypt:	Step 1: 2510-0200 or 02-2510-0200;	Step 2: 888-925-6769
Germany:	Step 1: 0-800-225-5288;	Step 2: 888-925-6769
Korea:	Step 1: 00-309-11;	Step 2: 888-925-6769
Panama:	Step 1: 800-0109;	Step 2: 888-925-6769
Peru:	Step 1: 0-800-50-288;	Step 2: 888-925-6769
Philippines:	Step 1: 1010-5511-00;	Step 2: 888-925-6769
Spain:	Step 1: 900-99-0011;	Step 2: 888-925-6769
United Arab Emirates:	Step 1: 8000-021 or 8000-555-66;	Step 2: 888-925-6769
Uruguay:	Step 1: 000-410;	Step 2: 888-925-6769

Employees calling from all other countries should consult the international toll-free number with the calling card dialing instructions listed on ClxHub.



The Clorox Company



Our Non-retaliation Policy: Zero Tolerance for Retaliation

As a company, we do not tolerate retaliation against anyone who raises an issue or concern in good faith or participates in an investigation even if no evidence of misconduct is found. We take claims of retaliation seriously — anyone found to have committed a retaliatory act is subject to disciplinary action, up to and including termination. If you or someone you know is the victim of retaliation, report it immediately to any of the Clorox resources available to us for reporting.

What Is Retaliation?

Retaliation means taking a negative action against a person for reporting in good faith actual or suspected misconduct to Clorox or the government or for participating in or cooperating with a Clorox or government investigation. It can include conduct such as (a) threats of physical harm, (b) threats of or actual termination of employment, (c) less desirable work assignments, (d) managerial or co-worker abuse, (e) exclusion from work activities or (f) negative impact on salary or benefits. This does not mean, however, that managers cannot take appropriate employment-related action, including disciplinary action, in the usual scope of their duties and based on valid performance-related factors.

When we in good faith seek advice, raise a concern or report actual or suspected misconduct, we are following the spirit of our Code and doing the right thing. We should all feel comfortable reporting actual or suspected misconduct without fear of losing our jobs or other harm.

Investigating Reports of Misconduct

All reports of possible violations of applicable law, this Code or Clorox policies are promptly evaluated and investigated where appropriate. Depending on the circumstances, the investigation may be conducted by managers or local supervisors, members of Legal Services, Human Resources, Internal Audit or an independent third party, as appropriate. All reports of potential misconduct will be handled with appropriate sensitivity and discretion. This means that information regarding an investigation will be shared with those who are necessary for an effective investigation and follow-up, or as required by applicable law. When feasible, the individual making the report is informed when the investigation has been concluded.

The Board of Directors, as a whole or through one of its committees, is informed of hotline reports and other appropriate reports of suspected business misconduct and the results of the investigations of those reports. The Board of Directors, as a whole or through one of its committees, may request managers, local supervisors or the Chief Legal Officer to conduct an investigation or may, in its discretion, retain its own advisors to advise or investigate reports.

Participating in an Investigation

Clorox is committed to ensuring that those of us reporting violations or participating in investigations are treated fairly. Any complaint of retaliation will be promptly investigated.

It is a violation of our Code to retaliate against anyone for cooperating with or participating in Clorox or government investigations involving possible violations of the law, our Code or other Clorox policies, even if the investigations find no evidence of misconduct. Anyone who retaliates against a person for participating in an investigation will be subject to disciplinary action, including termination.

WHEN WE IN GOOD FAITH SEEK ADVICE

We are following
the spirit of our
Code and doing
the right thing.



/ 2021 CODE OF CONDUCT /

Doing the Right Thing: How We Uphold the Code of Conduct and Our Core Values

3.

Our Core Values

By following our Code, as well as our core values and the principles that inspire them, we can establish and maintain an ethical culture in our company, where integrity and respect for others lead all our relationships, including our work with our business partners and in the communities where we do business.

At Clorox, our core values are an intrinsic part of who we are as a company and as individuals. They are holistic and do not stand alone, but rather work together to inform and reinforce each other. Our core values are a commitment we make to each other and to our shareholders, business partners, consumers, customers, suppliers and communities that we will always act with integrity and strive to achieve excellence in the right way.

Do the Right Thing

It's bigger than any one of us, yet it starts with each of us. We lead with integrity, and we earn trust — in every moment and with every choice. We are hungry to grow our business and believe that winning only counts if it's done in the right way.

Put People at the Center

We genuinely care about people. So, we understand the impact of our words and actions, and feel a responsibility to deliver for our consumers, customers, teammates and communities. We meet our commitments, put health and safety first and strive for a just and inclusive world.

Play to Win

We set the pace for growth in each of our categories. We reimagine the game and are each hungry to do more, think bigger, and execute better. It feels like a punch to the gut when we lose. We have high aspirations and the grit to take on big challenges, so we move forward together with courage and resilience in the face of obstacles.



MAKING AN IMPACT

We put health and safety first
and strive for a
just and inclusive world.



WE ARE HUNGRY TO GROW OUR BUSINESS

Winning only
counts if it's done
in the right way.

Q+A:

CORPORATE OPPORTUNITY

QUESTION

What is a “corporate opportunity”?

ANSWER

A corporate opportunity is a business opportunity that becomes known to an employee due to his or her position with the company, such as a potential investment or acquisition, or an opportunity to provide consulting, expert services or new technologies. We may not take advantage of corporate opportunities.



1. General Business Ethics

We exercise honesty and fairness in everything we do

Regardless of the situation, each of us — employees, managers, and executives — is expected to make decisions with honesty and integrity in everything we do. We should not make misleading statements or omissions of any kind. Any unlawful, unethical or deceitful business practices will not be tolerated.

2. Corporate Opportunities

We act in the best interest of Clorox

As Clorox employees and directors, we must always act in the best interests of Clorox, and we have a responsibility to promote Clorox's interests when opportunities to do so arise. This means that we cannot take business opportunities of Clorox for ourselves. Specifically, we must not (1) take personal advantage of opportunities discovered through the use of Clorox property or information, or through our positions at Clorox; (2) use Clorox property or information or our positions at Clorox for personal gain; or (3) compete with Clorox. We are each responsible for advancing Clorox's legitimate business interests when the opportunity to do so arises. If potential business opportunities for Clorox come to our attention, we must notify our managers or Legal Services.

3. Prohibited Stock Transactions

We do not engage in prohibited stock transactions

We may not engage in the following transactions in or related to Clorox securities: (a) short sales (selling Clorox securities we do not own); (b) those involving publicly traded options or other derivatives, the value of which is tied to the company's securities, including trading in or writing puts or calls on Clorox securities; (c) hedging transactions in Clorox securities; (d) pledging Clorox securities as collateral, and (e) holding Clorox securities in a margin account. A hedging transaction is a financial transaction that limits your investment risk in Clorox's securities through the purchase of an opposite position in the market to ensure a certain amount of gain or loss on a trade. Examples of hedging transactions include prepaid forward contracts and collars. It is also important to note that these restrictions do not just apply to us, but they also apply to: (a) anyone who lives in our households; (b) any family members who do not live with us but whose transactions in Clorox's securities are directed by, or subject to, our influence or control; (c) any corporation or other entity that we control or manage, and trusts for which we are the trustee or in which we have a beneficial interest; and (d) any Clorox securities over which we have voting power or dispositive power. For questions about specific transactions, please contact Legal Services. All employees and directors are expected to review our Insider Trading Policy.

4. Corruption and Bribery

We refuse to give or accept bribes or otherwise make inappropriate payments regardless of where we are located or with whom we do business

Clorox strictly forbids giving, soliciting, offering and accepting bribes, kickbacks and other prohibited payments by its employees, officers, directors, and business partners. We abide by anti-corruption laws everywhere we do business in the world, without exception. These laws include the U.S. Foreign Corrupt Practices Act (FCPA) and the UK Bribery Act 2010, as well as all applicable anti-corruption and anti-bribery laws in each country where we do business.

We prohibit offering, paying or authorizing bribes or anything of value (including cash or cash equivalents, gifts, stock, travel expenses, meals, entertainment, discounts, offers of employment, products, personal favors or any other direct or indirect benefit) to a government official to influence performance of official functions, or to obtain or retain a business advantage. No meals, entertainment, gifts or gratuities may be offered or provided to any government official except as explicitly provided in the Global Gifts, Entertainment & Hospitality Policy. No travel or other expenses for government officials may be provided prior to mandatory review by Legal Services. Entering into any business arrangement with government officials, including for consulting or spokesperson work, also requires prior mandatory review by Legal Services. Clorox prohibits facilitation payments, which are payments made to low-level foreign officials to ensure or speed up the performance of routine, nondiscretionary duties or actions. Facilitation payments are illegal in many countries and very narrowly applicable in the countries that do permit them.

Government officials include anyone with any affiliation with a government department, agency or instrumentality, at any level. This includes elected and appointed government officials, government employees at any level, political candidates, political party officials and members of public international organizations such as the United Nations or immediate family member of any of the above. Employees of state-owned or state-controlled enterprises (including hospitals, universities and research institutes) should also be considered government officials for the purposes of our Code and Clorox's policies.

Commercial bribery, or payments or gifts to any private individuals to induce that person to improperly perform any activity such as buying our products, is also prohibited. Additionally, any payments, offers or authorization to pay money or anything else of value which are unlawful under local laws in any country are prohibited.

It is very important that we do not engage business partners who may engage in corrupt activities on our behalf. Our [Business Partner Code of Conduct](#) requires our business partners to comply with all applicable laws, including anti-corruption laws, and the contracts we create with business partners should also reflect this requirement as appropriate. We cannot make any payment to a business partner if it will, or we

QUESTION

I need to obtain approval for a project as quickly as possible. The government employee I contacted has offered to speed up the process if I pay him a "small fee." May I make a small payment to a government employee to speed up the approval process?

Q+A:
CORRUPTION AND
BRIBERY

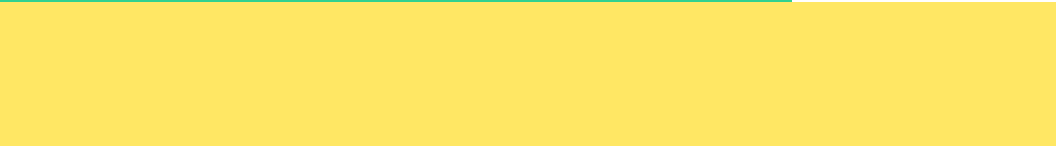
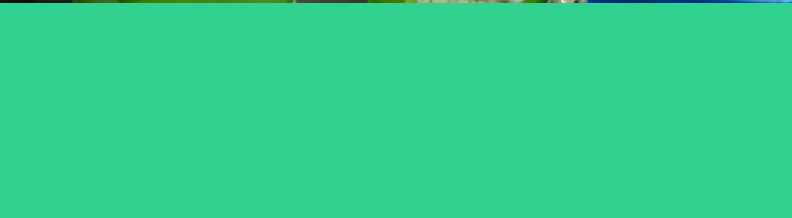
ANSWER

No. This type of payment is known as a "facilitation payment" and is prohibited by Clorox. You may not offer or pay any amount to government officials to facilitate government approvals even if it will speed up a project. You should notify your manager and Legal Services of this request for a facilitation payment. In certain cases, official payments paid directly to government agencies (not to government officials) for expedited services may be permissible, but check with Legal Services first.

suspect it will, be used for a prohibited payment. We perform risk-based due diligence on our business partners to avoid working with parties engaging in corrupt practices.

It is important that we maintain accurate and transparent books and records. All payments to third parties must be appropriately recorded in financial records and should be properly supported.

Every one of us, regardless of the country in which we work, must adhere to these requirements, even if these requirements may conflict with local custom or expectation. Whether a payment is appropriate is not always clear. When in doubt, we should discuss the particular situation with our managers and Legal Services, particularly when our work involves government officials. More information regarding corruption, bribery and other prohibited conduct, as well as required anti-corruption contract language, is contained in our Global Anti-Corruption Compliance Policy.



5. Gifts, Meals and Entertainment

We know and follow the Clorox gifts and entertainment standards and do not accept or give inappropriate gifts or hospitality

Clorox has a reputation for integrity. To preserve this reputation, we must not accept or give gifts that may influence or appear to influence business decisions or create a sense of obligation. We must never compromise our ability to make objective business decisions in Clorox's best interests and must always avoid the appearance of impropriety.

Q+A:

GIFTS, MEALS AND
ENTERTAINMENT

QUESTION

I am interviewing companies that are bidding on a potential project. One of the bidders has offered to take me to the Super Bowl, all expenses paid. May I attend the game?

ANSWER

No. A trip to the Super Bowl is of significant value and may influence your decision to award the business to that company. To determine what types of gifts may be acceptable, you should contact your manager and Legal Services.

WE MUST NOT ACCEPT OR GIVE GIFTS THAT MAY INFLUENCE OR APPEAR TO INFLUENCE BUSINESS DECISIONS OR CREATE A SENSE OF OBLIGATION.

Gifts, meals, entertainment and hospitality that exceed certain monetary thresholds — \$100 for gifts and \$250 for meals, entertainment and hospitality — require advance review by Legal Services and approval by a functional vice president (or other appropriate senior manager).

As a general matter, we may never accept or give gifts, meals, entertainment or hospitality that fit any of the following descriptions:

- Lavish, extravagant, illegal, inappropriate or of significant value
- Create a real or apparent sense of obligation
- Cash or cash equivalents, such as gift cards, coupons or stipends
- Provided for the improper purpose of obtaining an improper advantage, such as a favorable regulatory decision or execution of a contract

Gifts, meals, entertainment and hospitality may be accepted or given only if they are:

- In compliance with Clorox policies, the recipient's policies and all applicable laws
- Given openly and transparently
- Reasonable under the circumstances, such as occasional modest meals, occasional attendance at ordinary spectator events or gifts of nominal value (e.g., promotional trinkets with the Clorox logo)
- Appropriate for the location and occasion
- Given for the proper purpose of strengthening business relationships or demonstrating products or services

Gifts given to individuals and entities who are not affiliated with Clorox must be accurately reflected in our accounting records. We must never request any gifts, entertainment or hospitality. Special guidelines apply to gifts, meals and entertainment we give to non-U.S. government officials. Such gifts, meals and entertainment must also be compliant with local laws applicable to government officials and must in all cases be of an aggregate market value of less than US\$100 per individual government official in any six-month period. Gifts, meals and entertainment must not be given to family members or guests of government officials, except for reasonably priced meals where Legal Services has reviewed the circumstances in advance. All gifts to government officials, as well as any travel or accommodations provided to government officials, including any gifts to federal, state, or local government officials in the U.S., must be reviewed in advance by Legal Services.

For more information on giving and accepting gifts, meals, entertainment and hospitality, as well as special rules on working with government officials, please consult the Global Gifts, Entertainment & Hospitality Policy.

6. Political Contributions

We do not use Clorox funds or assets to support any political party, political committee, or candidate, except as expressly approved by Clorox

Clorox does not make, directly or indirectly, contributions of money or other things of value to any person, political party or governmental entity for the purpose of obtaining or retaining business. Clorox complies with all applicable laws and regulations where we work governing campaign contributions for any federal, state or local election, in any country. We are each free to use our own funds to make individual political contributions in accordance with applicable law. Clorox will never reimburse you, in any form, for a political contribution that you make, even if a political contribution is purportedly made on behalf of Clorox. More detailed information regarding our policies and practices governing political contributions is contained in applicable policies, including the Political Participation Policy.

7. Public Disclosure

We are accurate and timely in our communications about our business performance

All of our public communications, including filings with the Securities and Exchange Commission, must be accurate, timely and understandable. If we become aware of any material information or omission that may make our public disclosure misleading or inaccurate, we must promptly bring that information to the attention of our manager or the Senior Vice President – Chief Legal Officer.

QUESTION

I have a friend who is running for political office. Is it OK for me to help her with her campaign?

Q+A:

POLITICAL
CONTRIBUTIONS

ANSWER

Yes. Just make sure you do not use The Clorox Company's name, our brands' names or any company assets (including Company time or resources) to advance the campaign.

**CLOROX COMPLIES WITH ALL REGULATIONS
GOVERNING CAMPAIGN CONTRIBUTIONS.**



Q+A:

INSIDER TRADING

QUESTION

Sometimes my friends and family ask me about buying Clorox stock. May I tell them what I know about our business and suggest they buy stock?

ANSWER

No. If a friend or relative buys or sells stock based on nonpublic information that you give him or her, both of you could be liable for violation of securities laws. Furthermore, you could be in violation simply for sharing material nonpublic information, regardless of whether or not he or she uses it or benefits from it.



8. Protection and Proper Use of Clorox Assets

We use technology and company resources responsibly

All employees and directors are expected to protect Clorox assets and use those assets efficiently and appropriately. Theft, carelessness, misuse and waste have a direct impact on our profitability. Clorox assets should be used only for legitimate business purposes.

9. Insider Trading

We appropriately and lawfully comply with insider trading laws

The law prohibits insider trading — that is, buying or selling a company's stock at a time when an individual has "material nonpublic information" about that company. Material nonpublic information is information that is not generally known or available to the public that is reasonably likely to be considered by a reasonable investor as important in making an investment decision to buy, hold or sell securities. One way to determine what is material nonpublic information is to consider how it impacts you. If the information makes you want to buy, sell or hold stock, it is likely to have the same effect on others.

If we are in possession of material nonpublic information about Clorox or another company, we may not profit financially by buying, selling or, in any other way, dealing in Clorox securities or the securities of another publicly traded company to which the material nonpublic information relates. This prohibition includes the exercise of stock options (if the resulting stock is then immediately sold) and any decisions to invest in or dispose of Clorox stock through Clorox's benefit plans. This prohibition also includes passing on material nonpublic information to another person or suggesting that they buy or sell a company's securities while you are aware of material nonpublic information about that company. This practice, known as "tipping," also violates the securities laws and can result in the same penalties as engaging in insider trading directly, even if we do not receive any money or derive any benefit from the trade. We may not communicate any material nonpublic information to anyone else until a reasonable period of time (typically one full day of U.S. stock market trading) has passed after the information is publicly disclosed by Clorox through appropriate channels, and this obligation continues after our employment with Clorox.

For questions about specific transactions, please contact Legal Services. All employees and directors are expected to review our Insider Trading Policy.

10. Use of Intellectual Property and Proprietary Information

We are responsible for protecting the intellectual property and protected information entrusted to us

Clorox intellectual property (patents, copyrights, trademarks, trade secrets) and other proprietary information are valuable assets. Protecting these assets, including documenting their creation and maintaining their secrecy, is critical to Clorox's continued success. Patentable inventions include new and useful products, compositions, devices, methods, and techniques (and improvements thereof). Trademarks include words or symbols used to identify the company and its products and services. Copyrights protect creative expression, but can include things such as product labels or manuals or website content. Trade secrets include data or information that is treated as secret, derives value from not being known outside the company, and that is unavailable to those outside Clorox except under confidentiality agreements. Proprietary information includes data or other information that has been developed or assembled on Clorox's (or a third party's) time or at Clorox's (or a third party's) expense and is nonpublic or not easily determined or re-created by others.

No one should share Clorox intellectual property or proprietary information with anyone outside or within Clorox who is not authorized to receive and does not have a business need to receive that information. Additionally, no one should solicit or accept from anyone outside Clorox any intellectual property or proprietary information of another company or third party. We have no interest either in receiving or using any intellectual property or proprietary information of other companies or third parties except under an appropriate agreement with such companies, because to do so would be unethical, improper, and may violate the law.

All material used in the course of Clorox business that is protected by the intellectual property rights of others must be appropriately used with permission from the third party that owns or controls such rights. Questions about whether permission is needed, or whether the material may already have been licensed by Clorox, should be directed to Legal Services. More detailed information regarding Clorox policy and procedures on the protection of the trade secrets of others is contained in our Trade Secrets of Others Policy.

11. Use, Security and Monitoring of Systems

We follow all Clorox information technology security standards and procedures

We maintain a comprehensive information security program that includes administrative, technical and physical safeguards to protect the confidentiality, integrity and availability of Clorox's information systems and technology assets. We strictly control access and use of our technology systems, and may at any time monitor the use and content of our networks and computing assets, including company telephones, computers, and other electronic devices. Use of our systems and other technology resources is intended primarily for business purposes. All information and data stored on or transmitted through Clorox's technology resources is subject to all Clorox policies.

Unless we have a legitimate business need and are authorized to do so, we are expressly prohibited from accessing any system or database containing sensitive employee, company, customer or consumer information. This includes accessing a system or database related to a former job responsibility at Clorox, as well as receiving information via email distribution lists. If any one of us believes we may have access to a system or database containing sensitive information that is not required to perform our job duties, we must contact our manager or Legal Services.

We are each required to follow all Clorox policies, security measures and internal controls for computer and technology systems, including portable electronic devices, laptops, telephones and other storage devices provided by Clorox. More detailed information regarding Clorox policies, standards and procedures on security measures and internal controls for computer and communication systems is contained in our Information Security Policy and Information Technology Access, Use and Monitoring Policy.

12. Antitrust and Competition Laws

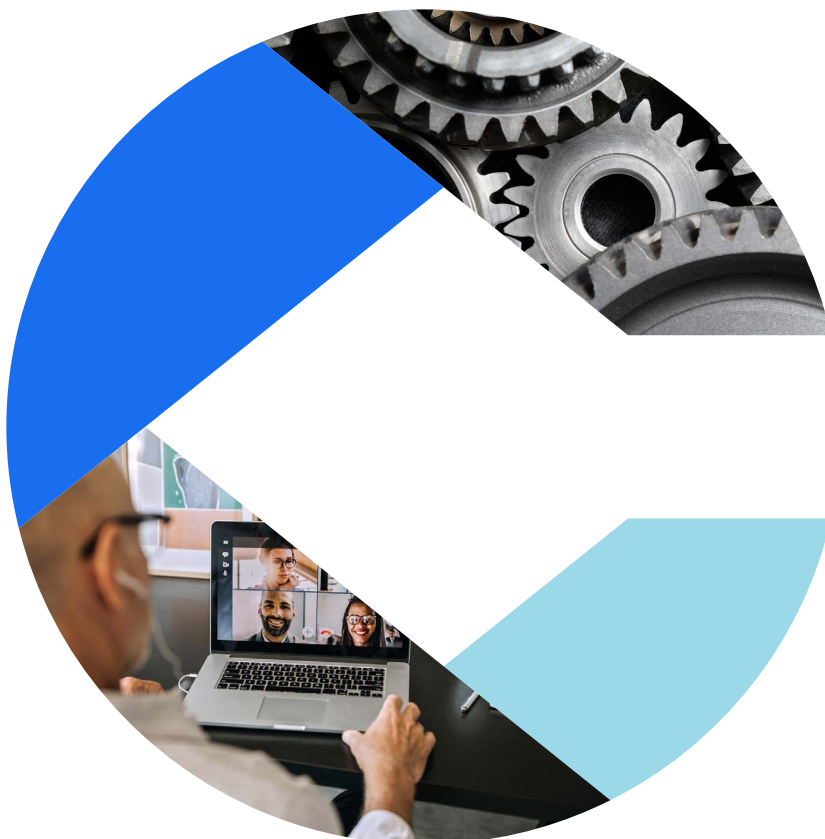
We follow antitrust and fair competition laws

Clorox is a staunch supporter of free and fair competition. Any conduct that would unfairly and unlawfully diminish competition in the marketplace is forbidden and will not be tolerated. To ensure markets operate fairly and efficiently, many nations have implemented laws to prohibit anti-competitive practices. We pride ourselves on strictly complying with these antitrust and competition laws. While antitrust and competition laws are complex, they generally forbid discussing or entering into formal or informal agreements regarding activities that may restrict competition.

Examples of conduct that is generally prohibited under the antitrust and competition laws and this Code include but are not limited to:

- Agreements among competitors about price or margin
- Agreements among competitors to allocate markets or customers
- Coordinating agreements among customers not to deal with competitors
- Unlawful restrictions on resale
- Sales unlawfully conditioned on agreements to purchase other products
- Exchanging commercially sensitive information with competitors, even if there is no agreement of any kind

More detailed information regarding prohibited conduct is contained in our Antitrust and Global Competition Policy.



MAKING AN IMPACT

We must never compromise
our ability to make
objective business decisions.

13. Interference with an Audit

We cooperate with all audit requests

It is unlawful to attempt to persuade an outside auditor to approve false financial statements. We are prohibited from making any false or misleading statements to our auditors or from taking any action to fraudulently influence, coerce, manipulate or mislead the auditors of Clorox financial statements. In addition, we honestly cooperate with all external and internal audit requests.

14. Conflicts of Interest

We avoid conflicts of interest or even the appearance of a conflict

A conflict of interest occurs when one's personal interests influence or appear to influence one's ability to act in the best interest of Clorox. We must address conflicts of interest in an ethical manner to ensure the decisions we make involving Clorox or its business are in the best interest of Clorox. Our personal interests can affect our decisions even when we think they will not, and conflicts of interest can have a negative impact on those around us. We must disclose conflicts of interest to Legal Services promptly and accurately, and to abide by any measures put in place by Clorox to protect its interests. Directors and executive officers must disclose actual or potential conflicts of interest to the Senior Vice President – Chief Legal Officer or the Audit Committee. The appropriate Clorox personnel will evaluate the situation to determine what measures are necessary to address the potential conflict of interest.

More detailed information regarding potential conflicts of interest and how to disclose them to the appropriate personnel is contained in our Conflicts of Interest Policy. Whether a conflict of interest exists is not always clear. When in doubt, we should discuss the particular situation with Legal Services. Directors and executive officers should contact the Senior Vice President – Chief Legal Officer with questions.

15. Confidential Information and Privacy

We take the appropriate steps to safeguard confidential information

Safeguarding confidentiality and privacy is everyone's responsibility. We must not access, use or disclose confidential or personal information in a manner that is not compatible with Clorox's applicable privacy notices and company policies or with the context in which the personal information was obtained by or on behalf of Clorox. Misusing or exposing Clorox's or others' confidential or personal information may damage Clorox's reputation and success and cause harm to others. We each must maintain the security, privacy and integrity of Clorox's confidential information as well as the confidential information of other companies and the personal information of individuals that we obtain while at Clorox and protect it, as appropriate, from unauthorized, incorrect or accidental access, use or disclosure. This includes all information that we learn about Clorox, as well as our employees, suppliers, customers, consumers and business partners that is not intended for public dissemination, such as trade secrets, personally identifiable information, sensitive business information, sensitive technical information, and communications regarding legal matters. More information about the standards and procedures we have established to protect confidential and personal information is in our Confidential Information Policy.

16. Workplace Behavior

We value and promote both equal employment opportunity and inclusion, and do not tolerate discrimination, intimidation or harassment

We are committed to providing a work environment free of discrimination and harassment. We are each responsible for maintaining a work environment consistent with our Code and Clorox policies, applicable law, relevant International Labour Organization (ILO) standards, and our culture of respect and dignity. Discrimination against or harassment of any group or individual on the basis of race, color, national origin, sex, gender, gender identity or expression, sexual orientation, marital status, registered domestic partner status, citizenship status, religion, age, physical or mental disability, medical condition, genetic characteristics and information, ancestry, military and veteran status or any other category protected by applicable law is strictly prohibited. Discrimination or harassment of an employee, business partner, or client is strictly prohibited, regardless of whether the conduct occurs on or off Clorox premises.

Retaliation against anyone for making a good faith report about misconduct (such as discrimination, harassment, or other violation of Clorox policies), or providing information or assistance in the investigation of such a report, or for rejecting sexual advances, will not be tolerated. More detailed information regarding standards of conduct is contained in our Anti-Harassment Policy.

Q+A:

CONFIDENTIAL
INFORMATION

QUESTION

Can I tell my manager about a potential acquisition target Clorox is considering?

ANSWER

It depends. Only certain essential team members are informed of a potential acquisition and they are subject to strict nondisclosure obligations. So, unless you know your manager is already part of the team working on that project, you should check with the project lead before talking to your manager about it.

17. Inclusion and Diversity

We welcome employees and business partners with diverse experiences and backgrounds

We strive to attract, develop and retain a workforce that is as diverse as the markets we serve and to ensure an inclusive work environment that embraces the strength of our differences. We believe in building a culture of inclusion which respects every employee for who they are – regardless of age, race, ethnicity, gender, religious identification, disability, sexual orientation, or any other category protected by applicable law. We are committed to ensuring employees feel comfortable to be their authentic selves and to offer their multifaceted perspectives, which we believe will result in a more positive work environment and help our company make more informed business decisions. Inclusion starts with each of our employees who must create a work environment in which employees and business partners feel valued and respected for their contributions. All of our employees should respect the diversity of each other's talents, abilities and experiences, value the input of others and foster an atmosphere of respect, trust, openness and candor.

More detailed information regarding our commitment to inclusion and diversity can be found on thecloroxcompany.com.

18. Treatment of Employees and Others

We respect each other and maintain fairness in relationships

We must treat each other and anyone with whom we interact on behalf of Clorox with respect and dignity. Treating everyone in the workplace with respect is a value that applies to each of us. We are expected to treat our colleagues, including business partners, customers, and other nonemployees with whom we work, with respect, fairness, and dignity.

**OUR COMMITMENT TO TREATING PEOPLE WITH
DIGNITY, RESPECT AND EQUAL OPPORTUNITY EXTENDS
TO OUR BUSINESS PARTNERS.**

19. Relationships with Business Partners (including Distributors, Suppliers, Consultants and Others)

We engage in fair and ethical dealings

Our commitment to treating people with dignity, respect and equal opportunity extends to our business partners. We conduct our business with honesty and integrity, and we expect our business partners' values and business practices to mirror ours regarding compliance with the law, product quality, safety, human rights, treatment of employees and environmental compliance.

We require all business partners that do business with Clorox to comply with the principles in our Business Partner Code of Conduct. Our Business Partner Code of Conduct outlines our expectations that suppliers share our commitments in the areas of human rights, labor, health and safety, the environment, and business conduct and ethics. In addition, these principles and standards of conduct apply to each one of us.

Moreover, we should report any violations of our Business Partner Code of Conduct by any supplier or other business partner as set out in the Business Partner Code of Conduct. Our Business Partner Code of Conduct can be found [here](#).





DO THE RIGHT THING

It's bigger than any
one of us, yet it starts
with each of us.



Q+A:

RECORDS MANAGEMENT

QUESTION

My manager has asked me to shred documents or delete emails related to a project handled by my department. Is it OK for me to do this?

ANSWER

If there is no ongoing or likely lawsuit, investigation, audit or examination to which the documents may relate, the destruction of documents and emails in the ordinary course of business is permissible if done in accordance with our Records Management Policy and Records Retention Schedule.

20. Clorox Records and Money

We are responsible for the accuracy of our records and financial statements

All Clorox records must be complete, timely, and maintained and presented accurately and reliably. Forgery and alteration of documents is prohibited. This includes the unauthorized alteration or manipulation of computer files. False or intentionally misleading entries in Clorox books or records must never be made.

We each have a duty to protect and properly use Clorox resources. We must accurately account for all Clorox money and spend it only on lawful Clorox-related purposes. If our duties involve verification of expenditures of Clorox money or requests for reimbursement, we are each responsible for verifying that our expenditures legitimately comply with Clorox policies and applicable laws, and that the amount of reimbursement received is accurate. We are all responsible for safeguarding Clorox assets, and therefore we must ensure proper accounting of expenses incurred as well as accurate payment of reimbursement requests. All requests for reimbursement must be submitted on a timely basis and be supported by original receipts. In addition, our expenditures must be properly recorded and comply with all applicable Clorox policies, including the Travel and Expense Reimbursement Policy.

21. Records Management

We manage business records in accordance with applicable retention requirements

Various laws and good business practices require Clorox to keep certain business records, including electronic records, for specific periods of time. In addition, we may not discard certain relevant records when litigation, subpoenas, audits or investigations are pending or anticipated. Storing business records longer than necessary, however, incurs needless costs and potential risks for Clorox and prevents the efficient retrieval and accessibility of relevant records.

We must all strictly comply with Clorox policies on management of company records. For specific information regarding how long to keep and how to dispose of business records, consult all applicable policies and schedules, including the Records Management Policy and Records Retention Schedule.

ANY TIME WE ENDORSE OR PROMOTE CLOROX, WE MUST DISCLOSE OUR CONNECTION TO THE COMPANY IN A CLEAR AND CONSPICUOUS MANNER.

22. Responsible Marketing

We market and advertise our products responsibly and strive to provide consumers accurate, reliable and transparent information about our products

We are committed to marketing our products fairly, accurately and in compliance with applicable laws and regulations so that our consumers can make informed purchasing decisions and continue to build trust in our brands. All employees are expected to comply with our Responsible Marketing Policy.

23. Social Media and Other Online Activity

We are responsible in our use of social media and other online platforms

Those of us who use online communication tools like blogs, social media sites and other digital platforms — whether on our own personal time or in an official capacity on behalf of Clorox — assume responsibility for ensuring that our activities do not violate Clorox policies or cause Clorox to violate laws or regulations.

Any time we endorse or promote Clorox or any of our products in a forum in which our connection to Clorox is not obvious, whether in person or online, we must disclose our connection to Clorox. Such disclosure must be clear and conspicuous, readily visible within our communication, and understandable and apparent to the average reader near the beginning of the communication. These requirements apply even to comments we make on our own personal blog or social media pages or on third-party websites, as well as to actions we take on Clorox-affiliated websites, such as product ratings and reviews and our brands' social media pages. If we use social media or other forums to express our personal views regarding Clorox, our products or our competitors, we should not indicate or imply that our comments represent the positions, strategies or opinions of Clorox. If we engage or provide something of value to a consultant, agency, celebrity, consumer, blogger or other party to entice or encourage them to review, promote or endorse Clorox or our products, or criticize our competitor's products, we must ensure that those parties also disclose their affiliation with Clorox. Additionally, we should never attempt to inappropriately view or access the personal social media accounts of our employees and job applicants.

For more detailed information regarding Clorox's policy and procedures on social media, please refer to our Social Media Policy.

QUESTION

I was browsing a social media site and saw a criticism of a Clorox product. I'm very familiar with the product and want to respond to the criticism with positive comments about the product. Do I have to say that I work for Clorox?

Q+A:

SOCIAL MEDIA

ANSWER

Yes. Any time we endorse or promote Clorox or our products online we must clearly and conspicuously disclose that we are an employee, director or consultant of Clorox, unless that fact is already apparent.

24. Environmental, Health and Safety Laws and Regulations, and Working Conditions

We maintain a safe and healthy work environment

Clorox is committed to safeguarding the health and safety of our employees, business partners, visitors, consumers and, more broadly, of the environment and communities where we do business. To support this commitment, all employees and directors are expected to fully comply with all applicable environmental, health and safety laws and regulations. These laws are extremely important to the ongoing health of our employees, business and communities. Clorox has written operating policies and procedures that govern our commitment to comply with all applicable environmental, health and safety laws and regulations and to otherwise minimize the company's environmental impacts, and we are expected to abide strictly by these policies and procedures. In addition, it is essential that all reports or representations made by or on behalf of Clorox as part of any internal audit or to any environmental, health or safety regulatory body are submitted completely and accurately, containing no false or misleading statements or false or misleading omissions.

Working Conditions: Ensuring safe working conditions is the responsibility of everyone in the organization and all our employees, no matter their seniority or job function, should feel empowered to speak up if they see something that does not feel right. Employees should always speak up and raise concerns if they are: asked to do a job they think they are not properly trained to perform and that may harm themselves or others; asked to do a task they consider to be unsafe; see someone performing a task that is unsafe or that the person is not properly trained to do; suspect equipment is not functioning properly and may be unsafe to operate; observe or are made aware of an unsafe condition or a potential danger to themselves or others.

Environmental Sustainability: Advancing environmental sustainability is embedded in our value of doing the right thing. We bring this to life through the commitments integrated in our corporate IGNITE strategy, including commitments focused on plastic and other waste reduction in our packaging and operations, and science-based climate action.

25. Product Safety

Consumer safety is a top priority

For more than a century, The Clorox Company has stood for health and wellness, dating back to the revolutionary disinfecting properties of our namesake Clorox Liquid Bleach. Safety of our consumers and communities is a top priority and we will not sell a product unless it meets our rigorous safety and quality assurances. If we learn that safety could be compromised for any given product once it is with our distributors, retailers or consumers, we immediately take action to assemble a cross-functional team that can assess the potential issue. When necessary, we will quickly recall products from the market.

WE REQUIRE OUR BUSINESS PARTNERS TO EXHIBIT RESPECT FOR FUNDAMENTAL HUMAN RIGHTS AND HUMAN DIGNITY AND RESPECT FOR THE EQUAL RIGHTS OF MEN AND WOMEN.

We are committed to innovation, development and marketing based on sound science, and have policies and standards in place to ensure that we meet these commitments. Safety and product quality are a crucial and integral part of our product design and product claims. We monitor and track consumer and customer feedback to proactively address potential product quality or safety issues.

Clorox strives to minimize product quality incidents, and through our best-in-class manufacturing, supply chain management, research and development capabilities and personnel training, we are proud of our strong product safety record. Of course, as with any large company, issues may arise and we as an organization are committed to quickly identifying the scope and cause of any quality issues and elevating through proper channels within the organization from the factory floor to management and to our Board of Directors, as appropriate.

All employees, no matter what their seniority or function, have a responsibility to speak up if they identify any potential issues. If there is ever a question, the safety of our consumers is always top priority.

26. Employee Freedom of Association

We recognize and respect our employees' right to freely associate

All of our businesses globally must respect the rights of workers to freely associate, organize and bargain collectively in accordance with applicable laws of the countries in which they are employed. Where employees are represented by a legally recognized union, Clorox is committed to bargaining in good faith with the employees' freely chosen representative. Employees have the right to form and join such organizations of their own choosing without prior authorization.

All of our businesses must respect the rights of workers to communicate openly with management and with each other regarding working conditions without fear of retaliation, harassment, intimidation, penalty or interference. Clorox respects the International Labour Organization (ILO) Fundamental Conventions relating to workers' freedom of association and right to organize and requires that our business partners do the same (see our Business Partner Code of Conduct).

27. Human Rights

We recognize and promote human rights on a global basis

As stated in our [Human Rights Commitment](#), we prohibit the use of forced or otherwise illegal labor and human trafficking. We do not condone the exploitation, physical punishment, abuse, trafficking or involuntary servitude of children or others.

We require our business partners to exhibit respect for fundamental human rights and human dignity and respect for the equal rights of all people while doing business with us. Our expectation of business partners on these issues is explicitly outlined in our [Business Partner Code of Conduct](#).

28. Money Laundering and Terrorist Financing

We do not engage in or facilitate money laundering or the funding of terrorism

Clorox prohibits money laundering and any activity that facilitates money laundering or the funding of terrorism or other criminal activities. Money laundering involves any transaction designed to either promote criminal activity or conceal or disguise the proceeds of criminal activity. Everyone at Clorox must comply with laws and regulations that prohibit money laundering and to report suspicious activity or behavior.

29. Global Trade: Export Controls, Restricted Countries, Imports and Boycotts

We follow and abide by applicable global trade laws

Everyone at Clorox must comply with applicable global trade laws and regulations. Each employee and site that is involved in the cross-border transfer of any goods, technology or other items has the responsibility of ensuring that such activities are conducted in compliance with all applicable import and export laws.

The U.S. and other governments impose sanctions or otherwise restrict transactions with certain individuals, entities, countries/territories, and governments. There are broad prohibitions on virtually all transactions with certain countries or territories subject to comprehensive sanctions or embargoes, as well as with their governments, entities, and residents. Other restrictions apply to transactions with particular governments, as well as with particular parties engaged in the proliferation of weapons of mass destruction, narcotics trafficking, membership in transnational criminal organizations terrorism, activities raising human rights concerns, or other targeted activities. Everyone at Clorox must comply with applicable prohibitions or limitations on transactions with sanctioned or restricted parties and countries.

Governments also sometimes seek to advance their own political agendas by requiring or pressuring companies to boycott the companies or products of other countries. U.S. anti-boycott laws forbid Clorox from agreeing or complying with unsanctioned boycott requests, whether oral or in writing. Clorox is also required to report these requests to the U.S. government. If we receive any requests to support an unsanctioned boycott, we must ignore or in some cases strike or remove the requests from the documents in which they appear and report them to our managers and Legal Services. Please see the Global Trade Compliance Policy for more information regarding global trade laws.

30. Working Hours

We follow and abide by applicable laws for working hours, wages and benefits

Clorox is committed to creating humane working conditions for all employees. Clorox monitors overtime hours and our employees are not required to work more than what is permitted under applicable law. Generally, the standard work day is 8, 10 or 12 hours in a shift, with overtime computed separately for each day or week worked, depending on local regulations.

Clorox pays its employees the minimum applicable legal wage or more, and if there is no wage law, then at least the local industry standard. Clorox overtime rates are also calculated in accordance with applicable regulations. Clorox is committed to providing a living wage for all employees, as defined under applicable law.



