



## Business Partner Code of Conduct

# OUR

# CORE

A handwritten signature in dark blue ink, reading "Linda", with a stylized flourish at the end.

## Do the right thing.

This value has been part of Clorox since our founding in 1913, and it's one of the reasons I love working here.

At Clorox, we know that our long-term success relies upon honest and ethical business practices and treating people with dignity, respect, and equal opportunity. This is how we build trust with the millions of consumers who bring our products into their homes and lives every day.

We require all team members and employees of wholly owned subsidiaries to be trained annually on our Code of Conduct so everyone understands our commitment to responsible business practices and responsible sourcing for our products.

We expect our business partners to live up to our values and standards, too. That's why we've developed a Business Partner Code of Conduct (Code). It details business practice standards for our direct suppliers of goods and services, consultants, distributors, licensees, joint ventures, contractors and temporary workers.

Our Code also supports our sustainability commitments related to human rights and labor, respectful treatment and equal opportunity, anticorruption, and environmental sustainability. Our Code is grounded in international standards and best practices, including the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work and the Ten Principles of the United Nations Global Compact.

Please take the time to read the Code so that you understand Clorox's ongoing expectations of you as our business partner.

Our business relationships are rooted in integrity and based on the Clorox core value to "do the right thing." Thank you for your partnership.

**Linda Rendle**  
Chief Executive Officer



# WHAT

# IS

# THE

# CODE

# ?

Who must comply with it?

What are the consequences  
for violations?

A high-angle, top-down photograph of a person with long brown hair, wearing a light blue short-sleeved shirt, reaching into a garden to harvest leafy green vegetables. The person's hands are visible, touching the leaves. To the left, a wooden crate is filled with harvested, bright green leafy greens. The garden is filled with various types of leafy plants, including some with large, rounded leaves and others with more delicate, frilly leaves. The lighting is natural, suggesting an outdoor setting during the day. The word "VALUES." is superimposed in large, white, sans-serif capital letters across the center of the image.

# VALUES.

## Clorox maintains relationships with business partners who share our values

Our Code details business practice standards for our direct suppliers of goods, service providers, consultants, distributors, licensees, joint ventures, contractors and temporary workers. It is based on the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work and reflects our commitment to advancing Clorox's sustainability goals as well as the Ten Principles of the United Nations Global Compact (UNGC), to which we are a signatory. The UNGC's Ten Principles are derived from the Universal Declaration of Human Rights, United Nations Guiding Principles on Business and Human Rights, the International Labour Organization's Declaration on Fundamental Principles and Rights at Work, the Rio Declaration on Environment and Development, and the United Nations Convention Against Corruption.

Clorox business partners must meet or exceed the principles, expectations and commitments contained in the Code, including:

- Complying with all applicable laws and regulations
- Protecting human rights of workers, including the principle of freely chosen employment, and treating all workers with dignity

- Creating safe working conditions and a healthy work environment for all workers
- Safeguarding the environment and reducing the environmental impact of our operations
- Establishing high standards of ethical conduct and complying with fair business practices

We also expect our business partners to ensure that their own business partners assisting with Clorox-related business meet or exceed the principles set forth in the Code.

The Clorox responsible sourcing policies, commitments and standards translate the Code's principles into practical requirements that Clorox business partners are expected to adhere to. In situations where laws applicable to our business partners are more restrictive than the principles of the Code, our business partners must follow the applicable laws.

Nothing in the Code shall create any employment relationship with a business partner's workers or any new or additional third-party rights for a business partner or its workers. Business partners will control and be responsible for the performance of their workers and the essential terms of their employment.



## Business partner training, policies and codes

Business partners must communicate the principles and expectations set out in the Code to their workers and business partners in a manner understandable to all. To satisfy this obligation, we encourage business partners to develop and maintain internal training, policies and/or codes to ensure that their workers and business partners assisting with Clorox business understand the principles and expectations set out in the Code.

Although Clorox may periodically offer business partners and their workers trainings on legal, responsible sourcing, or compliance topics conducted by Clorox or on Clorox's behalf, such offers will not alter the contractor relationship between Clorox, the business partner and their employees.

## Consequences for violations of the Code or applicable laws

Business partners must be able to demonstrate compliance with the principles of the Code. Compliance with the principles of the Code and all applicable laws is a material condition of continued business with Clorox, and business partners may not do indirectly what the Code forbids business partners from doing directly.

We may pursue legal or other remedies against any business partner who violates the Code or applicable laws when conducting Clorox business. Additionally, in the event of non-compliant conduct, we may, in our sole discretion, require the business partner to implement remedial measures specified by Clorox within a defined time period or impose consequences up to and including termination of the business relationship and any related contracts.





WHAT

CAN I DO

IF I NEED

HELP ?

or want to report a concern?



# ASK & REPORT.



## Asking questions and reporting concerns

Our Code details business practice standards. No code of conduct can cover every business situation that may require legal or ethical guidance. We encourage our business partners to contact us with any questions about the Code or ethical or legal concerns arising from their relationship with us. In addition, anyone who becomes aware of any actual or potential violation of the Code or any applicable law by any Clorox business partner, or other misconduct including infringements on human rights, should immediately report such conduct to Clorox. Business partners should have internal reporting and escalation channels that are available to their employees and ensure that concerns can be raised without fear of retaliation.

Additionally, business partners, including their employees, may inform their primary contacts at Clorox or utilize third-party reporting options available through Clorox's Compliance Hotline, to raise concerns. Ensuring access to reporting mechanisms is a core component of this Code, and business partners are expected to disseminate this information in a manner that is easily understood and accessible for all employees.

The Clorox Compliance Hotline can be reached using the contact information below. Business partners are expected to comply with all applicable data privacy laws when using the hotline. We will in turn comply with applicable requirements upon receipt.



## Ask questions or report concerns by telephone

### UNITED STATES, CANADA AND PUERTO RICO

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

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

#### ARGENTINA

0800-555-1352

#### AUSTRALIA

1-800-08-7065

#### MAINLAND 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

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

#### UNITED ARAB EMIRATES

Step #1: 8000-021

or 8000-555-66

Step #2: 888-925-6769

## Ask questions or report concerns by internet

<http://www.cloroxhotline.com>

## Ask questions or report concerns by mail

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

*Callers from other countries should consult the international toll-free number with the dialing instructions listed on [www.cloroxhotline.com](http://www.cloroxhotline.com).*





## Investigating reports of misconduct

All reports of possible violations of the Code or applicable laws by our business partners will be evaluated promptly and investigated where appropriate. The investigation may be conducted by Clorox personnel and/or our third-party advisors. Reports of potential misconduct will be handled with appropriate sensitivity.

This means that information regarding an investigation will only be shared with those who have a need to know for an effective investigation and follow-up. Clorox also expects its business partners to conduct independent investigations where the business partner's employees are involved or implicated.

## Zero tolerance for retaliation

We are committed to ensuring that persons who report violations or participate in investigations are treated fairly. Business partners may not retaliate against their workers who, in good faith, report possible violations of the law or the Code internally, to Clorox, law enforcement or government agencies. Similarly, Clorox expects business partners will not retaliate against their workers for cooperating with or participating in

good faith in any investigation of actual or potential business misconduct or Code or legal violation. Retaliation can include conduct such as (a) harassment or threats of physical harm, (b) loss of job or contract, (c) less desirable work assignments, or (d) negative impact on salary, benefits or contractual remuneration. Retaliation against workers is a violation of the Code and may lead to termination of the business relationship with Clorox.

## Monitoring, certifications and auditing

Business partners are expected to designate one or more members of management staff to be responsible for the implementation and maintenance of systems to assess and monitor its compliance with the Code.

From time to time, and consistent with our business partners' obligation to comply with the Code, we may ask business partners to execute certifications of their compliance with the principles in the Code.

From time to time, Clorox or its third-party advisors may evaluate business partners' compliance in areas relevant to the Code, such as financial books

and records, quality, human rights, labor standards and practices, health and safety, business ethics, and environmental compliance. All Clorox business partners are expected to cooperate with reasonable requests from Clorox or its advisors in connection with performing these reviews, audits and remediation, and to respond accurately and transparently to requests for information. In the event these reviews or audits uncover that a business partner is not adhering to the Code or Clorox's social, sustainability and ethical practices expectations, appropriate remediation steps may be taken, up to and including termination of the business relationship or contracts.



A pair of hands is shown from the wrists up, cupping a small, vibrant green seedling with several leaves. The hands are positioned over a dark, rich, and textured soil. The background is split: the left side shows the soil and hands, while the right side is a solid orange color with white text boxes.

WHAT

DOES THE

CODE

REQUIRE

ME TO

DO?



ETHICAL & RESPONSIBLE.

## Human rights and labor

As stated in our Human Rights Commitment, Clorox's business partners must respect the human rights of workers and must treat all workers with dignity. Business partners must conduct appropriate due diligence to identify, prevent, mitigate and account for how they address potential or actual adverse human rights impacts. These impacts may arise from their own activities or be directly linked to their operations, products, or services by virtue of their business relationships. Clorox does not condone the exploitation, physical punishment, abuse, trafficking or involuntary servitude of children or others. Clorox business partners must:

**Prohibit harassment, discrimination, harsh or inhumane treatment:** Business partners must provide a workplace free from discrimination, harassment, bullying, and abuse. Physical abuse or discipline, the threat of physical abuse, sexual or other harassment, and verbal abuse or other forms of intimidation shall be prohibited. Business partners must comply with all applicable laws, treat their workers with dignity and respect, and must endeavor to provide equal opportunities and fair treatment to all workers with respect to hiring, employment, promotions, training, compensation, benefits, termination or retirement and acceptable living conditions when accommodation is provided. Business partners must not discriminate against any person on the basis of any protected characteristic legally recognized in the jurisdiction where the Business partner does business, or any self-identified or perceived association with such category.

**Comply with internationally recognized wage and hour and benefits standards as well as local laws:** Business partners must comply with internationally recognized applicable wage and hour and benefits standards and laws, including standards and laws governing minimum wages, maximum hours, days of service, rest periods, overtime pay and restrictions, worker benefits, and leaves of absence.

**Wages:** Business partners must provide all workers with written and understandable information about their employment conditions and wages before they enter employment, including specific information about the payment of wages, such as rate of pay, pay periods and frequency, overtime standards and calculation, and any conditional or discretionary payments. Business partners must also provide workers with a timely and understandable written statement with each wage payment, via pay check or similar documentation, so

that workers can verify that they have been accurately compensated for the work they have performed. At a minimum, business partners must provide all workers with the legal minimum wage as defined under applicable law. Business partners must not make deductions from wages as a disciplinary measure nor make any deductions from wages not provided for by applicable law without the express permission of the worker concerned. All disciplinary measures should be documented in writing.

**Working hours:** All work must be voluntary and workers must be free to terminate their employment without penalty, if reasonable notice is given as per worker's contract. Regular working hours, excluding overtime, should be defined by contract, and overtime hours should be subject to standards set forth under applicable law. Although Clorox defers control to its business partners, business partners must use overtime responsibly and reasonably, taking into account the extent, frequency and hours worked by individual workers and the workforce as a whole. Overtime should not be used to replace regular employment. Business partners must always compensate overtime, in accordance with applicable law and/or prevailing industry standard. The total hours worked in any 7-day period shall not exceed 60 hours, except in the following exceptional circumstances where all of the following criteria are met: (i) it is allowed by national and local laws; (ii) it is allowed by collective agreement freely negotiated with a workers' organization representing a significant portion of the workforce; (iii) appropriate safeguards are taken to protect the worker's health and safety; and (iv) business partners can demonstrate that exceptional circumstances apply such as unexpected production peaks, accidents or emergencies. Business partners must comply with local and national law, in providing employees with sufficient rest days within a working period.

**Responsible employment and recruitment:** To every extent possible, business partners must ensure that work is performed on the basis of recognized employment relationships established through national law and practice. Business partners must not avoid their obligations to employees under labor or social security laws and regulations arising from regular employment relationships through the use of labor-only contracting, sub-contracting, or home-working arrangements, or through apprenticeship schemes where there is no real intent to impart skills or provide regular employment, nor shall any such obligations be avoided through the excessive use of fixed-term contracts of employment. Clorox expects that business partners will have full understanding of the entire recruitment process, including all labor recruiters and intermediaries in terms of required legal and/or ethical requirements. Effective management systems must be in place to identify and monitor the hiring and management of all migrant workers, contract, agency, and temporary or casual workers, including the potential abuse of such workers. Business partners must ensure that employment agencies only supply workers registered with them and that workers pay no recruitment fees or related costs at any stage of the recruitment process, or as a condition of employment. Business partners' workers' contracts must accurately reflect the agreed payment and terms in the recruitment process and are understood and signed by workers. There should be no sub-contracting unless previously agreed with Clorox. Business partners must have systems and processes in place to manage sub-contracting, home-working and external processing of workers. Business partners must ensure that they only employ workers with a legal right to work. All workers, including employment agency staff, must be validated by the business partners for their legal right to work by reviewing original documentation.

## Human rights and labor

Clorox's business partners must respect the human rights of workers and must treat all workers with dignity. Clorox business partners must:

### **Comply with laws protecting the rights of workers to freely associate:**

Business partners must respect the rights of workers to freely associate, organize and bargain collectively in accordance with applicable laws and the customs of the countries in which they are employed. Union or committee meetings should be organized in a way that allows participation for all workers. Business partners must respect the rights of workers to communicate openly with the business partners' management or with each other regarding working conditions without fear of retaliation, harassment, intimidation, penalty or interference. Where the right to freedom of association and collective bargaining is restricted under law, business partners must facilitate and not hinder the development of parallel means for independent and free association and bargaining.

### **Prohibit human trafficking and modern slavery:**

Business partners must evaluate and mitigate risks of human trafficking and modern slavery in their operations, and must not produce goods or services for Clorox using forced, bonded, or involuntary prison labor or compulsory labor. Such prohibited conduct includes: (i) force, threats of force, physical restraint or threats of physical restraint to that person or another person; (ii) serious harm or threats of serious harm to that person or another person; (iii) the abuse or threatened abuse of law

or legal process; (iv) any scheme, plan or pattern intended to cause the person to believe that, if that person did not perform such labor or services, that person or another person would suffer serious harm or physical restraint; (v) any act involved in the recruitment, abduction, transport, harboring, transfer, sale or receipt of persons within national or across international borders, through force, coercion, fraud or deception, to place persons in situations of slavery or slavery-like conditions; (vi) the surrender of identity or immigration documents; (vii) the imposition of unreasonable restrictions on workers' freedom of movement; (viii) the demand that any worker directly or indirectly pay for their job or lodge "deposits"; and (ix) any requirement or threat that a person is indebted or coerced to work. We may require that business partners certify 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.

**No child labor:** Business partners must comply with all applicable child labor laws, including laws governing minimum age requirements and hazardous or night work. Business partners must not employ individuals under the age of 14 (unless such work does not interfere with schooling and is permitted by local laws or applicable

portions of the ILO Declaration on Fundamental Principles and Rights at Work). Hazardous work must not be performed by any individual under the age of 18. Business partners may not produce goods or services for Clorox with: (i) the sale and trafficking of children; (ii) debt bondage and serfdom of children; (iii) forced or compulsory labor of children; or (iv) work which is likely to harm the health, safety or morals of children. Business partners must develop or participate in and contribute to policies and programs which provide for the transition of any child found to be performing child labor to enable her or him to attend and remain in quality education until no longer a child. Clorox's definition of "a child" is in accordance with the ILO Conventions for minimum ages (C138) and child labour (C182).

### **Land rights of communities:**

Business partners must respect the rights and title to property and land of individuals, indigenous people and local communities. All negotiations with regard to purchasing, leasing, extracting from or otherwise using property, natural resources or land, including the use of and transfers of such, must adhere to the principles of free, prior and informed consent, contract transparency and disclosure. Clorox has zero tolerance for land grabbing.

Business partners must maintain safe working conditions and a healthy work environment for all of their workers, and the workers of their business partners. Business partners must:

## Health and safety

**Establish site-specific compliance processes and programs:** Business partners must have in place the proper processes and programs that will ensure safety, health and environmental compliance with applicable regulatory requirements.

**Communicate hazards:** Business partners must ensure that workers receive appropriate workplace health and safety information, regular and recorded training and warnings, and such trainings shall be repeated for new or reassigned workers. All training must be documented. Warning signs shall be posted near any hazards in the language workers can understand and Business partners must ensure Safety Data Sheets for any hazardous or toxic substances used in the workplace are readily available at all times for workers to access.

**Prevent occupational injury and establish occupational safety procedures:** Business partners must identify, mitigate and eliminate hazards where possible, including worker exposure to physically demanding, highly repetitive or forced assembly tasks. Business partners must establish safe work procedures and provide appropriate tools and personal protective equipment (at no cost to the worker). Physical guards, interlocks and barriers should be provided, properly inspected, and maintained for equipment used by workers. As part of this commitment, business partners must establish procedures and systems to manage, track, investigate and report occupational injury and illness, including to provide necessary medical treatment, investigate cases and implement corrective actions to eliminate their causes and facilitate the return of workers to work.

Business partners must provide access to safe and healthy working conditions, including to adequate sanitation, potable water,

lighting, temperature, ventilation, suitable facilities for women's health needs and, if appropriate, provide sanitary facilities for food storage. When business partners provide accommodation, it must comply with local law and be clean, safe, structurally maintained, and meet the basic needs of the workers. All facilities must have clear and unrestricted exits. Workers must be able to raise any health and safety concerns without retaliation.

**Prevent chemical and other exposure:** Business partners must identify, evaluate, mitigate and, where possible, eliminate worker exposure to harmful chemical, biological and other physical agents. Where hazards cannot be eliminated, business partners must provide appropriate controls such as closed systems and ventilation. In all cases, business partners must provide safe work procedures and appropriate personal protective equipment (at no cost to the worker).

**Prepare for emergencies and their response:** Business partners must anticipate, identify and be prepared for emergency situations and events, and minimize their impact by implementing appropriate emergency plans and response procedures and business continuity plans to support recovery of operations. Basic plans should include protective actions (evacuation, shelter in place, and lockdown procedures as well as accounting for people) as well as worker training regarding emergency preparedness. Facilities and buildings should have basic fire detection and suppression equipment plus first-aid supplies. On-site emergency evacuation training must be conducted on a periodic basis by business partners, including worker notification and evacuation procedures, worker training and drills, appropriate fire detection and suppression equipment, adequate exit facilities and first-aid supplies.



## Environment

As part of our values and Clorox's commitment to the UN Guiding Principles on Business and Human Rights and the Ten Principles of the UN Global Compact, we are dedicated to driving sustainable and ethical practices across our operations and our supply chain. To help us meet this commitment, our business partners must comply with all applicable environmental regulations and must demonstrate stewardship of the environment and work to reduce the environmental impacts of their operations.

We also expect business partners to support Clorox in achieving our sustainability goals, to strive toward goals that are equally as ambitious to their organizations and to work toward continuous improvement of their sustainability performance. Business partners must have an environmental policy covering their environmental impact, which is communicated to all appropriate parties, including its own suppliers. Business partners must have a nominated individual responsible for coordinating their sites' efforts to improve environmental performance. Business partners must:

### **Prevent banned or restricted product**

**content:** Business partners must implement programs to ensure their products do not contain restricted, banned or unlawfully taken or traded materials, including protected wildlife, protected plants or illegal wood products. Business partners must also disclose to Clorox what due diligence they performed to determine whether their supply chain is free of minerals or materials that finance conflict in the Democratic Republic of the Congo and surrounding countries, or from other countries designated as part of a conflict region, including providing relevant documentation upon request.

### **Manage hazardous materials appropriately:**

Business partners must identify and manage chemical and other materials posing a hazard if released to the environment and must ensure safe handling, management, movement, storage, recycling or reuse, and disposal of such materials, if not by themselves, through licensed third parties in accordance with all applicable laws. Business partners must work to prevent accidental or deliberate releases of hazardous materials, including wastewater and solid waste and air emissions of volatile chemicals or other substances that would violate applicable

laws or cause adverse environmental impacts on the local community.

### **Prevent pollution and waste:**

Business partners should aim to reduce pollution and waste related to their business, including emissions to air and water and emissions of greenhouse gasses, and where possible segregate waste to reduce landfill disposition and encourage their own suppliers and business partners to do the same. In order to facilitate these reductions, business partners should adopt policies addressing topics such as energy and water use, management of hazardous materials, deforestation, and other waste and environmental risks relevant to their business. Business partners should use commercially reasonable efforts to reduce or eliminate waste of all types, including source reduction, recycling, composting, reusing materials and conserving water and energy. Where it is a legal requirement, business partners must be able to demonstrate that they have the relevant valid permits, including for use and disposal of resources (e.g., water, waste, etc.) and have available for review any environmental certifications or any environmental management systems documentation.

### **Conserve natural resources and reduce**

**environmental footprints:** Business partners should operate in a sustainable manner consistent with reducing the environmental impact of their operations and encouraging their own suppliers and business partners to act in the same manner. Business partners are expected to harvest, mine or otherwise acquire and use materials for production in a responsible manner that minimizes the negative impact on the well-being of humans, animals and biodiversity, forests and oceans, and other habitats, ecosystems and living systems.

### **Respond to sustainability related requests:**

Clorox strives toward greater traceability and transparency of our supply chain including our raw materials and manufacturing locations to assess and monitor associated risks and improve sustainability and human rights conditions in our supply chains. Business partners must disclose all manufacturing facilities that manufacture or convert raw materials for our products. We expect existing and potential business partners to support our reporting and traceability initiatives to comply with the Code, and to encourage their own business partners to do the same. This includes responding to our information requests regarding sustainability commitments and progress — such as environmental footprint reporting, supply chain traceability, site visits and third-party verification. This information may be considered in our selection decisions and our willingness to continue doing business with any business partner. Clorox may also periodically assess and audit business partners in practices such as environmental performance, health and safety, human rights, ethics and fair competition (see section II.H). If a business partner is not acting in accordance with our expectations, we may implement corrective steps to address these concerns, including education, formal warnings and, when warranted, termination of the relationship.

### **Minimize packaging and shipping impact:**

Business partners should identify methods to eliminate or minimize the amount of packaging and resources used to ship products. Business partners should utilize recycled, recyclable, reusable or returnable shipping material and should make every effort to optimize shipping methods to minimize energy consumption.

A white pickup truck is parked on a dirt road, viewed from the rear. The truck's bed is filled with several pallets of bottled water, which are wrapped in clear plastic. The scene is set in a wooded area with tall evergreen trees in the background. The lighting suggests it's either early morning or late afternoon, with long shadows cast across the ground. The word "INTEGRITY." is superimposed in large, white, sans-serif capital letters over the center of the image.

# INTEGRITY.

## Business conduct and ethics

Business partners must commit to and abide by the highest standards of ethical conduct and fair business practices. Business partners are encouraged to have their own policy prohibiting bribery, corruption or any type of fraudulent business practice. Business partners must ensure that the staff whose job roles carry a higher level of risk in the area of ethical business practice (e.g., regulatory approvals, sales, purchasing, logistics) are trained on what action to take in the event of an issue arising in their area. Business partners must:

**Comply with all applicable laws:** Business partners must ensure that they, their affiliates and their workers comply with all applicable laws and regulations when conducting business for Clorox.

**Not give or accept bribes or other improper benefits or engage in corruption:** Business partners must not give, offer, or promise anything of value (including cash and cash equivalents, as well as gifts, travel expenses, meals, entertainment, discounts, offers of employment, charitable contributions or sponsorships, goods, services, personal favors or any other benefit) directly or indirectly to any government official or any other person or organization for the purpose of improperly influencing the recipient or obtaining or retaining an improper business advantage. Government officials include any (i) officer, employee or consultant of a government or governmental department or agency; (ii) officer or employee of a state-owned enterprise or partially state-owned enterprise; (iii) political party official or candidate for political office; (iv) official or employee of a public international organization, such as the World Health Organization or World Bank; (v) any private person acting temporarily in an official capacity; or (vi) the spouse or any immediate family member of the persons mentioned above. Business partners must fully comply with the U.S. Foreign Corrupt Practices Act, the UK Bribery Act 2010 and all other applicable anti-corruption laws. Business partners also may not accept or request any improper payments or anything else of value. All Clorox payments to business partners must be made directly to the business partners by local bank wire transfer, check or credit card.

**Comply with international trade controls, sanctions and anti-boycott laws:** Business partners must comply with U.S. and other applicable import/export controls, sanctions, and anti-boycott laws when conducting business for Clorox, and must avoid taking any actions that would cause Clorox to violate these laws. Business partners must not transfer Clorox goods or technologies

to sanctioned/embargoed countries or territories, to sanctioned or restricted parties, or for restricted end uses unless such transfer is authorized or otherwise not prohibited by applicable law or regulation and approved in advance by Clorox.

**Supply Chain Security:** Business partners must implement robust physical security measures at all warehouses, production sites, transportation vehicles, and storage facilities to prevent unauthorized access, theft, diversion and tampering. Any security breach, theft, diversion, or tampering incident must be promptly reported to Clorox, along with corrective actions taken. Business Partners must align with recognized supply chain security frameworks (e.g., C-TPAT, ISO 28000) and maintain documentation for audits.

**Comply with antitrust and competitive laws:** Business partners must not enter into agreements or take actions that unreasonably restrain trade, are deceptive or misleading, or restrict competition. Business partners must comply with all applicable antitrust and competition laws.

**Behave ethically in contracting:** Business partners must compete fairly and ethically for all business opportunities. Business partners must ensure that all statements, communications and representations to or on behalf of Clorox are accurate and truthful. Business partners who contract with government entities must understand and comply with the specific laws and rules that may apply when contracting with public entities. Government contracting often invokes laws that do not apply in commercial transactions, such as those designed to promote transparency and fair competition, or to advance public policy goals. In addition to conducting themselves with the highest degree of integrity and honesty, business partners engaged in government contracting should have the appropriate policies, procedures, training, and internal controls as required by applicable law or rules.

**Protect intellectual property and confidentiality:** Business partners must respect and protect Clorox's intellectual property rights and maintain the confidentiality of Clorox trade secrets and other Clorox proprietary or confidential information. Confidential and proprietary information includes any information that is non-public or not easily determined or obtained by others. Business partners must also respect the intellectual property rights, trade secrets and confidential or proprietary information of third parties and are prohibited from compromising these rights in the course of working with Clorox. Business partners may not use Clorox's name or trademarks in any advertising or marketing materials or disclose a commercial relationship with Clorox without prior written authorization from Clorox.

**Follow social media rules:** Business partners may not speak on behalf of the Clorox Company without prior written authorization from Clorox. To the extent business partners engage in any pre-authorized communication that is designed to endorse, advertise, or promote Clorox products, they must clearly and visibly disclose the nature of their relationship with Clorox and remain in compliance with applicable laws and regulations and Clorox policies.

**Comply with securities and insider trading laws:** Business partners that possess nonpublic information relating to Clorox must not use or share that information to trade or enable others to trade in Clorox securities or the securities of another company to which such information pertains. Business partners must comply with all applicable securities and insider trading laws when conducting Clorox business.

**Operate with high financial integrity:** Business partners must not make false, inaccurate or intentionally misleading entries in accounting books, records or communications with external or internal auditors related to Clorox, and must maintain accurate books and records in compliance with generally accepted accounting principles.

**Avoid conflicts of interest:** A conflict of interest occurs when someone's personal interests influence or appear to influence their ability to act objectively and in Clorox's best interest. For that reason, business partners must disclose to Clorox any actual or potential conflict of interest. Business partners must inform Clorox if one of their workers, investors, family members or other affiliated person has a relationship with a Clorox employee who can make decisions that may affect the business partner's business, or if a Clorox employee has an interest of any kind in the business partner's organization. Ownership of less than 1% of a public company's outstanding shares need not be disclosed unless it might influence judgment or decisions.

**Minimize gifts and avoid offers of hospitality:** Business partners must ensure that the acceptance or giving of any gift or offer of hospitality when performing Clorox business is not and cannot be construed as an attempt to secure favorable treatment from or to any party. Business partners and their family members must not accept or give any gift or offer of hospitality exceeding a nominal value when conducting Clorox business.

**Prohibit animal testing:** Business partners must ensure that they do not conduct, or cause third parties to conduct, any animal testing with products, raw materials or components of finished products supplied to Clorox, unless such testing is disclosed in writing to Clorox in advance and mandatory under applicable laws.

**Comply with anti-money laundering and counter-terrorism financing laws:**

Business partners must comply with applicable anti-money laundering and counter-terrorist financing laws. Business partners must scrutinize the source of funds transmitted to Clorox to ensure that the funds are not the proceeds of criminal activity. Business partners also must conduct due diligence of customers and counterparties to avoid inadvertently facilitating money laundering or funding terrorist organizations in the course of doing business with Clorox.

**Protect personal information and maintain security programs:**

Business partners must ensure that they, their affiliates and their workers comply with all applicable laws and regulations concerning the collection, use and protection of personal information when conducting business for Clorox. Personal information includes information that relates to an identifiable individual. Personal information must only be used for the purposes that are stated in the applicable privacy notice and authorized by the contract. Business partners must take appropriate steps to safeguard the confidentiality and privacy of the personal information of individuals, including maintaining a robust security program. Business partners must not access, use or disclose personal information in a manner that is not compatible with the context in which the personal information was obtained by or on behalf of Clorox, or otherwise not aligned with the contract or Clorox's expectations based on the business relationship with Clorox.





DO THE RIGHT THING.