



# Supplier Manual for Shipments to the U.S.

Revision Date: August 20, 2026

## 1. Introduction

As an importer of goods into the United States, The Clorox Company (Clorox) must comply with Customs and Border Protection (CBP) laws and regulations. CBP also enforces the laws and regulations of other governmental agencies, such as the FDA, USDA, and EPA. Non-compliance with U.S. laws and regulations may result in shipment delays, additional duties, fees, and penalties.

It is Clorox's policy to be fully compliant with all applicable U.S. laws, regulations, and its [Corporate Code of Conduct](#) policies. Clorox relies on its ability to successfully import products assembled or manufactured abroad.

The purpose of the Supplier Manual for Shipments to the U.S. ("Supplier Manual") is to define and clarify the business requirements for **suppliers exporting products** (raw materials, finished goods, samples, technology) **to the U.S.** The Supplier Manual provides our international suppliers with a guide for adherence and compliance with all U.S. import laws.

## 2. Contacts

### Clorox Headquarters & Team:

The Clorox Company  
1221 Broadway  
Oakland, CA 94612

### **International Trade Operations:**

US & CA International Trade Operations Manager  
Telephone: 905.595.8274, 647.616.5616  
Email: [trade.operations@clorox.com](mailto:trade.operations@clorox.com)

### **Global Trade Compliance:**

US & CA Global Trade Compliance Manager  
Email: [trade.operations@clorox.com](mailto:trade.operations@clorox.com)

### U.S. Customs Broker for Clorox:

Kuehne + Nagel Inc.  
1350 NW 129th Ave, S  
Suite 400 Miami, FL 33178, United States.  
Phone # 305-704-6300

For imports from Canada:

[northern.border@kuehne-nagel.com](mailto:northern.border@kuehne-nagel.com)

For imports from other countries:

[xzclorox@kuehne-nagel.com](mailto:xzclorox@kuehne-nagel.com); [trade.compliance@clorox.com](mailto:trade.compliance@clorox.com)

### 3. Shipping Documents

All shipments must be accompanied by the following documents:

- Commercial invoice
- Packing list
- Bill of lading (ocean) or airway bill (air)
- Certificate of Origin – where preferential duty claims are intended
- Import Security Filing (ISF)

Email all completed documents to: [trade compliance@clorox.com](mailto:trade compliance@clorox.com)

#### 3.1 Commercial Invoice (see appendix A for sample invoice)

Commercial invoices must comply with both U.S. Customs Regulations and The Clorox Company requirements (19 CFR §142.6(a)(4)). Commercial invoices **must be in English** and include the following:

- ✓ Name and complete address of seller
- ✓ Name and complete address of shipper ("ship from") if different from seller
- ✓ Manufacturer name and complete physical street address
- ✓ Name and complete address of buyer "sold to" or "importer of record," using the table below
- ✓ Exporter of record (where applicable)
- ✓ Name and complete address for "ship to" including Clorox contact name, email and telephone number of recipients
- ✓ Invoice number, issuing date, and Clorox brand, (see table below), Clorox purchase order or STO number
- ✓ Unique identification number of material being shipped (Clorox material ID number, UPC number, SKU, or other identification / part number for each item shipped)
- ✓ Detailed description of each item shipped as referenced on the Clorox purchase order or STO
- ✓ U.S. harmonized code (HTSUS Code) by line item
- ✓ Shipment line item quantity, unit of measure, and total quantity
- ✓ Value of each item by line value (detailed unit price)
- ✓ Total value of the shipment
- ✓ Currency of the transaction (three-letter code, e.g., USD, EUR, SGD, CNY)
- ✓ Country of origin per line item
- ✓ Terms of sale / incoterm, incoterm year, and named place (example: FCA 2020 Origin Site, FOB 2020 Origin Port, DAP 2020 Destination Site, etc.) **\*\*\*Note: Incoterm used on invoice should match Incoterms in the contract**
- ✓ List any discounts, rebates, drawbacks and/or bounties separately itemized in the invoice
- ✓ All goods or services furnished for the production of merchandise not included in the invoice price, such as assists. Assists are tools, dies, molds, and packaging provided free of charge to suppliers by Clorox or engineering, development, artwork, design work, plans and sketches that are undertaken in a foreign country, not in the United States.<sup>1</sup>

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<sup>1</sup> To determine the value of the assist that is required to be listed on the commercial invoice, please contact Clorox's Trade Compliance and Operations team ([tradeoperations@clorox.com](mailto:tradeoperations@clorox.com)).

- ✓ Payment terms (if a sale transaction)
- ✓ Net and gross weights in kgs. (kilograms)
- ✓ Be signed by a party knowledgeable of the shipment
- ✓ Bill of lading number (if available)
- ✓ Page numbering (e.g., Page 1 of X)

**SOLD TO/ IMPORTER OF RECORD TABLE**

| Account name                       | Address                                   | Tax ID number | ACE ID  | Products                                                                   | Brands                           |
|------------------------------------|-------------------------------------------|---------------|---------|----------------------------------------------------------------------------|----------------------------------|
| A & M MANUFACTURING                | 1221 Broadway<br>Oakland, CA 94612        | 94-332435100  | 4583154 | silica cat litter;<br>machinery<br>and parts                               | <b>Fresh Step<br/>Cat Litter</b> |
| BURT'S BEES, INC.                  | 1221 Broadway<br>Oakland, CA 94612        | 01-046537500  | 530654  | personal care<br>products;<br>packaging<br>components                      | <b>Burt's Bees</b>               |
| CLOROX COMMERCIAL<br>COMPANY       | 1221 Broadway<br>Oakland, CA 94612        | 66-057418200  | 3691558 | finished<br>goods,<br>cleaning<br>products                                 | <b>Clorox</b>                    |
| CLOROX MANUFACTURING CO<br>OF PR   | PO BOX 2133<br>SAN JUAN, PR<br>00922-2133 | 66-032864000  | 3627581 | raw materials;<br>fragrances;<br>machinery<br>parts                        | <b>Clorox</b>                    |
| CLOROX MANUFACTURING<br>COMPANY    | 1221 Broadway<br>Oakland, CA 94612        | 27-458159200  | 9807714 | components<br>for home<br>care/cleaning<br>products<br>(triggers,<br>caps) | <b>Clorox</b>                    |
| CLOROX SERVICES COMPANY            | 1221 Broadway<br>Oakland, CA 94612        | 94-324052600  | 4559504 | R&D samples                                                                | <b>Clorox</b>                    |
| GLAD MANUFACTURING<br>COMPANY      | 1221 Broadway<br>Oakland, CA 94612        | 94-332434800  | 4583137 | plastic bags;<br>machinery<br>and parts                                    | <b>Glad</b>                      |
| HV MANUFACTURING<br>COMPANY        | 1221 Broadway<br>Oakland, CA 94612        | 94-324052500  | 4559501 | machinery<br>and parts                                                     | <b>Hidden Valley</b>             |
| KINGSFORD MANUFACTURING<br>COMPANY | 1221 Broadway<br>Oakland, CA 94612        | 94-324052400  | 4559498 | lignite (coal)                                                             | <b>Kingsford</b>                 |
| THE CLOROX SALES COMPANY           | 1221 Broadway<br>Oakland, CA 94612        | 94-277308700  | 4454946 | water filtration<br>devices                                                | <b>Brita</b>                     |

### 3.2 Packing List (see appendix B for sample packing list)

The packing list must include the following information:

- ✓ Final delivery address
- ✓ Packing list number and date
- ✓ Unique material identification number for each item shipped
- ✓ Clorox PO number or STO
- ✓ Clorox UPC number
- ✓ Detailed description of each item being shipped
- ✓ Quantity and unit of measure per line item (e.g., each, kilogram, carton, crate or container, etc.)  
**\*\*\*Note: Pallets are an unacceptable manifest quantity for U.S. Customs purposes – DO NOT USE “pallets” as a manifesting quantity for House Bill of Lading**
- ✓ Gross and net weight for each item
- ✓ Gross and net weight for the entire shipment and pallet count
- ✓ Total dimensions of shipment
- ✓ Statement of preferential origin (where applicable)

**\*\*\*Note: If all information required on the packing list is included on the export invoice a separate packing list is not required.**

### 3.3 Additional Documentation

Depending on the country of export, the country of import (in this case the U.S.), and the item being shipped, additional documentation may be required, including but not limited to:

- ✓ Certificates of origin
- ✓ Export / import licenses or permits
- ✓ Authorizations to make entry
- ✓ Other Governmental Agency (OGA) submission requirements
- ✓ Letters of credit
- ✓ Documentation regarding end use
- ✓ Certificates of analysis, conformance or compliance testing results
- ✓ Material safety data sheets
- ✓ Delivery verification certificates
- ✓ Any other pertinent information a national Customs authority requires that supports the declaration

**\*\*\*Note: Commercial documents must match final count of quantities shipped. Additions or deductions in quantity shipped made at time of loading/shipping must be amended on commercial invoices and packing lists. Corrected documents must immediately be brought to the attention of the International Trade Operations team ([trade.compliance@clorox.com](mailto:trade.compliance@clorox.com)).**

### 3.4 Shipping Samples, Research & Development (R&D) Shipments

The documentation requirements for samples are the same as for commercial imports. To avoid delays, include the following for sample shipments:

- ✓ Clorox recipient's name and phone number on the invoice
- ✓ Value for Customs purposes (the cost of the goods if they are to be purchased)
- ✓ Indicate the value along with the statement "Value for Customs Purposes Only."

- ✓ Identify the corresponding Clorox brand and tax ID.
- ✓ Research & Development samples correspond to:

| Importer Name (Clorox Brand) | Address                            | Tax ID number | Products    |
|------------------------------|------------------------------------|---------------|-------------|
| CLOROX SERVICES COMPANY      | 1221 Broadway<br>Oakland, CA 94612 | 94-324052600  | R&D Samples |

## 4. Other Requirements

### 4.1 Country of Origin and Marking

Country of origin (COO) is a core U.S. customs concept that affects tariff treatment, marking requirements, and eligibility for preferential trade programs. Importers are responsible for correctly determining the origin of imported goods and ensuring compliance with U.S. marking laws.

The statutory basis for country of origin marking is the Tariff Act of 1930 (19 U.S.C. § 1304), which requires imported articles, unless excepted, to be marked to indicate their country of origin to the ultimate purchaser in the United States. The implementing regulations in 19 CFR Part 134 define “country of origin” as the country of manufacture, production, or growth of an article.

When goods are produced in more than one country and no preferential trade agreement applies, CBP generally determines origin using the substantial transformation rule. Under this rule, the country of origin is the country where the article last underwent a substantial transformation—meaning it became a new and different article of commerce with a new name, character or use. For example, compounding waxes, oils, pigments, and active ingredients into finished lip balm, followed by heating, homogenization, and filling, generally constitutes a substantial transformation. By contrast, simple activities such as relabeling, repackaging, or melting and re-pouring pre-formulated lip balm typically do not change origin.

For goods qualifying under preferential trade agreements such as USMCA, country of origin is determined based on specific rules set forth in 19 CFR Part 102, including tariff-shift rules, regional value content, or required manufacturing processes. These rules apply for preferential duty claims and may differ from non-preferential marking determinations.

All imported goods subject to marking requirements must be marked legibly, permanently, and conspicuously in English with their true country of origin. Failure to comply may result in marking duties, penalties, or corrective action under CBP supervision.

### 4.2 Free Trade Agreements (FTA)

The United States is a party to multiple Free Trade Agreements (FTAs) that provide eligible products preferential tariff treatment, including reduced or duty-free entry and, where applicable, exemption from certain fees. Preferential treatment may only be claimed when a product strictly complies with the applicable FTA’s Rules of Origin and documentation requirements.

FTA eligibility is agreement-specific and product-specific. Suppliers are solely responsible for understanding the applicable FTA, validating product eligibility, and ensuring full compliance prior to issuing or providing any FTA-related documentation.

Applicable U.S. Free Trade Agreements include, but are not limited to:

- Australia
- Bahrain
- CAFTA-DR (Costa Rica, Dominican Republic, El Salvador, Guatemala, Honduras, Nicaragua)
- USMCA (Canada, Mexico)
- Chile
- Colombia
- Israel
- Jordan
- Morocco
- Oman
- Panama
- Peru
- Singapore

To support any claim for preferential treatment under a Free Trade Agreement, the supplier must:

- Identify and understand the applicable FTA and its specific rules of origin
- Perform and maintain a documented origin analysis (origin study) demonstrating that the product qualifies under the applicable FTA
- Issue or provide a Preferential Certificate of Origin only when the product fully meets all applicable rules of origin and supporting documentation is complete and verifiable
- Maintain complete supporting records, including but not limited to:
  - Bills of materials
  - Production and manufacturing processes
  - Costed bills of materials and value calculations
  - Supplier origin certifications and declarations
- Retain all FTA-related documentation in accordance with U.S. Customs and Border Protection (CBP) recordkeeping requirements and make such records available upon request
- Provide documentation promptly to The Clorox Company or CBP in the event of a validation, audit, inquiry or verification
- Submit Preferential Certificates of Origin annually and in advance of shipment to:  
[trade.operations@clorox.com](mailto:trade.operations@clorox.com)

**Compliance Notice:** Suppliers must not issue or provide a Preferential Certificate of Origin if:

- The product does not meet the applicable rules of origin, or
- Adequate supporting documentation is not available or cannot be substantiated

U.S. Customs and Border Protection closely scrutinizes FTA claims. Improper, unsupported or incorrect claims may result in retroactive duties, penalties, interest, liquidated damages and other enforcement actions. Failure to comply with FTA requirements may adversely impact the supplier's eligibility to conduct business with The Clorox Company.

### 4.3 Ocean Shipments – Importer Security Filing (ISF)

All ocean shipments destined to the U.S. for which Clorox acts as the Importer of Record requires the supplier to provide the mandatory information below for full compliance with U.S. Customs requirement, **2 business days prior to the loading of the shipment aboard the intended vessel**. This will allow time for our Customs broker to submit timely filings.

**Documents required for ISF filing:** Commercial invoice, packing list and ISF data must be provided to the designated Freight Forwarder at the time of cargo booking.

If Clorox is the acting Importer of Record, please send all documents to

[ISF@kuehne-nagel.com](mailto:ISF@kuehne-nagel.com); [xzclorox@kuehne-nagel.com](mailto:xzclorox@kuehne-nagel.com); [trade.operations@clorox.com](mailto:trade.operations@clorox.com);  
[trade.compliance@clorox.com](mailto:trade.compliance@clorox.com)

**\*\*\*Note: Non-compliance with ISF requirements can result in shipment delays, additional duties, fees, and penalties of USD \$5,000 per shipment to Clorox.**

Mandatory information required for ISF:

1. Supplier or manufacturer name and address
2. Seller name and address
3. Consolidator/stuffer name and address
4. Container stuffing location
5. Importer of record tax ID number
6. Buyer name and address
7. Ship to party
8. Consignee tax ID number
9. HS Number – 6 digits harmonized code
10. Country of origin



#### 4.4 Container Security & Seal Standards

Container integrity must be maintained to protect against the introduction of unauthorized material and/or persons. Procedures must be in place to verify the physical integrity of the container and/or truck structure prior to stuffing, to include the reliability of the locking mechanisms used on the doors.

Supplier must meet the minimum requirements:

Maintain written procedure for container security and control of seal issuance which includes the following elements:

- ✓ Procedures must be in place for reporting and neutralizing unauthorized entry into containers or container storage areas
- ✓ Seven-point Inspection must be conducted prior to loading all containers, to look for signs of hidden compartments, concealed contraband in naturally occurring compartments, and signs of pest contamination. The inspection must include front wall, left side, right side, floor, ceiling/roof, inside/outside doors, outside/undercarriage.
- ✓ Container inspection must include inspection of doors, handles, rods, hasps, rivets, brackets, and all other parts of a container's locking mechanism for tampering or hardware inconsistencies.
- ✓ Inspection records for each container must be maintained for at least 90 days. CBP has recommended as a best practice to maintain these records for at least 12 months.
- ✓ Live load containers. If this is not feasible, containers must be stored in a secure area to prevent unauthorized access and/or manipulation.
- ✓ Maintain written procedures which stipulate how seals are affixed to loaded containers. The procedure must include the VVTT process:
  - V – View seal and container locking mechanisms; ensure they are functional
  - V – Verify seal number against shipment documents for accuracy
  - T – Tug on seal to make sure it is affixed properly
  - T – Twist and turn the bolt seal to make sure its components do not unscrew, separate from one another, or any part of the seal becomes loose
- ✓ At point of stuffing – affix an ISO 17712 standard high-security seal for all containers bound for the U.S.
- ✓ Include the high-security seal number on the Bill of Lading.
- ✓ All seals and container numbers should be recorded and maintained in a log for at least 90 days.

\*\*\*Note: As best practice, CBP has recommended maintaining seal and container numbers for at least 12 months.

\*\*\*Note: CBP has recommended taking digital photographs at the point of stuffing. For verification purposes, photos may be requested by Clorox

## 4.5 Pest Contamination and Wood-Packing Material

Suppliers must have written procedures in place for the avoidance of pest contamination which comply with Wood Packaging Materials (WPM) regulations. Measures regarding WPM must meet the International Plant Protection Convention's (IPPC) International Standards for Phytosanitary Measures No. 15 (ISPM 15).

WPM is defined as wood or wood products (excluding paper products) used in supporting, protecting, or carrying a commodity. WPM includes items such as pallets, crates, boxes, reels, and dunnage.

All foreign suppliers are to comply with ISPM 15 standards for wood products. ISPM 15 includes internationally accepted measures that may be applied to WPM to significantly reduce the risk of introduction and spread of most pests that may be associated with WPM.

ISPM 15 affects all wood packaging material requiring that it be debarked and then heat treated or fumigated with methyl bromide and stamped or branded with the IPPC mark of compliance.

Products exempt from ISPM 15 are made from alternative materials, like paper, metal, plastic or wood panel products (i.e. oriented strand board, hardboard, and plywood).

### Minimum Requirements (both legal and Clorox requirements):

- ✓ Provide personnel with training to know how to detect pests and contaminants.
- ✓ Monitor the cargo staging area to ensure the area is free from plants and plant pests.
- ✓ Monitor inside building(s), outside building(s), in and around containers and container areas.
- ✓ A visual inspection of cargo and shipping containers (interior and exterior) must be performed to check for contaminants and pests before loading.
- ✓ Vacuum, sweep, blow out or (if necessary) wash containers prior to loading.
- ✓ Container pest inspection records for each container must be maintained for at least 90 days, detailing who did the pest inspection as well as what was done to remove any visible pests or contaminants.
- ✓ Inspect the interior and exterior of the trailer, looking at general cleanliness and areas of structural concern. The inspection should look at areas where pests could enter or create harborage and other conditions which could lead to product contamination.
- ✓ Look for condensation or moisture inside the trailer.
- ✓ Check the contents of the load for damage prior to loading.
- ✓ Be aware of any odors that might indicate contamination of products.
- ✓ Inspect the condition of pallets for presence of pest evidence. Collect samples if anything is found.
- ✓ Preventative measures such as the use of baits, traps, or other barriers can be used, as necessary.
- ✓ Removal of weeds or reduction of overgrown vegetation around the facility may help in the elimination of pest habitat within staging areas.

## 4.6 Customs Trade Partnership Against Terrorism (CTPAT) Security Requirements

CTPAT is a voluntary joint government–business initiative led by U.S. Customs and Border Protection (CBP), established in 2001 to strengthen supply chain and border security. Through CTPAT, CBP works with the trade community to ensure the integrity of security practices throughout international supply chains.

Clorox has been an active participant in the CTPAT program since 2008 and consistently maintains compliance with CBP’s CTPAT Importer Security Criteria. As part of this commitment, Clorox requires its vendors, suppliers, and business partners involved in shipments to the United States to adhere to applicable CTPAT security requirements.

CTPAT recognizes the complexity of international supply chains and promotes the implementation of security measures based on risk analysis. Security programs may be customized based on the business model and operational risk of each partner; however, minimum security standards must always be met.

To support Clorox’s participation in the CTPAT program, all suppliers shipping product to the United States must:

- Complete an annual Supplier Security Risk Assessment Questionnaire, when requested by Clorox.
- Cooperate with Clorox on any corrective actions or remediation plans identified resulting from the assessment.
- Maintain written security policies, procedures, and controls consistent with CTPAT Security Criteria, as applicable to their operations.
- Confirm annually their commitment to comply with CTPAT security requirements.
- Ensure that relevant security measures are communicated to and implemented by critical subcontractors, service providers, and business partners within their supply chain.

Upon receipt of the completed assessment, Clorox will review the information provided and may request additional details or clarification. Suppliers acknowledge that reported security measures may be subject to validation through on-site visits conducted by Clorox, its designated third party, or U.S. Customs and Border Protection. U.S. Customs and Border Protection may also conduct independent audits or physical verifications of supplier security practices as part of the CTPAT program.

Failure to comply with CTPAT security requirements may impact the supplier’s eligibility to do business with Clorox.

Additional information regarding CTPAT Security Criteria for foreign manufacturers and suppliers can be found at:

- <https://www.cbp.gov/border-security/ports-entry/cargo-security/ctpat>
- Clorox CTPAT Contact: [trade.operations@clorox.com](mailto:trade.operations@clorox.com)

## Appendix A – Sample Commercial Invoice

|  <b>Commercial Invoice</b> |                 |                                                     |                          |                                |
|-------------------------------------------------------------------------------------------------------------|-----------------|-----------------------------------------------------|--------------------------|--------------------------------|
| <b>Exporter/Shipper</b><br><br><b>EIN#</b>                                                                  |                 | Invoice No.                                         |                          | Invoice Date                   |
|                                                                                                             |                 | Customer PO No.                                     |                          | Export Order No.    Order Date |
|                                                                                                             |                 | SEAL NO.                                            |                          | Container No.                  |
|                                                                                                             |                 | Clorox Bill of Lading                               |                          | Shipping Lines name            |
| <b>Consignee / Sold To</b><br><br>                                                                          |                 | <b>Forwarding Agent</b><br><br>                     |                          |                                |
|                                                                                                             |                 | <b>Point(State) of Origin or FTZ Number</b><br><br> |                          |                                |
| <b>Ultimate Consignee / Ship To</b><br><br>                                                                 |                 | <b>Notify Party</b><br><br>                         |                          |                                |
| ETD                                                                                                         | ETA             | Booking No.                                         | Payment Terms            | Terms of Sales                 |
| Exporting Carrier                                                                                           |                 | Port of Loading/Export                              | Container Size           | Related Parties                |
| Foreign Port of Unloading                                                                                   |                 | Place of Delivery by On-Carrier                     | Remit in U.S Currency To |                                |
|                                                                                                             |                 |                                                     |                          |                                |
| Marks & Numbers                                                                                             | No. of Packages | Description of Packages & Goods                     | Gross Weight             | Measurement                    |
|                                                                                                             |                 |                                                     |                          |                                |

## Appendix B – Sample Packing List

**Packing List**

Inv. Number:  
Inv. Date:  
Page 1 of

Sold To:

Ship To: \_\_\_\_\_  
\_\_\_\_\_

Ship date:  
Terms of Sale:  
Freight Collect or Prepaid:

Purchase Order Number:

| Item # | Description                            | Qty | no. of cartons | net wt  | gross wt |
|--------|----------------------------------------|-----|----------------|---------|----------|
| ABC123 | Liquid glass cleaner<br>900 ml – blue  | 500 | 10             | 462 kg  | 543.5 kg |
| DEF456 | Liquid glass cleaner<br>900 ml – green | 500 | 10             | 462 kgs | 543.5 kg |

Marks and seal #:  
Total cartons:  
Gross weight: kg  
Net weight: kg  
Country of manufacture:

Manufacturer:

Signature: \_\_\_\_\_  
Company Name