

The Clorox International Company

UK Modern Slavery Act Transparency Statement

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

Clorox's Business Partner Code of Conduct ("Business Partner Code") addresses business practices of third-party business partners, including suppliers, distributors, consultants, joint ventures, licensees, and other business partners ("business partners"). The Business Partner Code contains specific provisions addressing human rights, labor, and business conduct, including verification of Clorox's product supply chain to evaluate and address risks of human trafficking and slavery.

To that end, Clorox asks its Business Partners to self-certify their compliance with the principles in its Business Partner Code (either in a contract and/or a Business Partner Code of Conduct self-certification form). Suppliers are expected to designate management staff to monitor their factories, production facilities and compliance with the Business Partner Code. Clorox supply agreements also contain representations that its business partners are in compliance with all applicable federal, state and/or provincial, regional, municipal, and local laws, codes, regulations, rules, ordinances, decrees, permits, registrations and orders, which would include laws addressing human trafficking and slavery. In addition, Clorox may conduct semi-announced visits and/or have third-parties monitor visits to ensure compliance with the Business Partner Code, including compliance with prohibition on slavery and human trafficking. Clorox also requires in the Code 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.

The Clorox Compliance Hotline, where permissible under local laws, is available to all employees, directors and contractors, as well as its business partners, their employees or their subcontractors. The hotline, where permissible, enables the reporting of noncompliance by Clorox's business partners, their employees or subcontractors. Clorox employees who do not act promptly to report noncompliance matters may be subject to disciplinary action.

Clorox provides all non-production employees with regular training regarding compliance with the Clorox Code of Conduct, which also includes provisions prohibiting the use of forced labor. Clorox has conducted global training for its product supply leadership, internal team members with direct responsibility for supply chain management, and have begun training its business partners to identify and address risks of slavery and trafficking in its supply chain.

Finally, as part of its Responsible Sourcing & Sustainability program, Clorox evaluates (and may use third parties to evaluate) its supply chains for risk, including human rights and labor risks such as trafficking and slavery. Clorox supports its Business Partner Code with site visits, self-assessments and third-party audits. Clorox is an active member of AIM-Progress and the Supplier Ethical Data Exchange (Sedex) through which it has started engaging its business partners in Sedex Members Ethical Trade Audits. Clorox supports mutual recognition platforms for audits to encourage its business partners to focus on remediation and improvements rather than re-audit by multiple customers. In the event concerns arise, Clorox will investigate the matter and take appropriate actions to mitigate the risk by either terminating the relationship or remediating to ensure its business partner is in compliance with its Business Partner Code.



Angela C. Hilt
Director, Clorox International Company, for and on behalf of the Board of Clorox International Company