California Transparency in Supply Chains Act Disclosure Statement

The Clorox Company has programs to effectively manage the risks of slavery and trafficking throughout our supply chain.

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

To that end, we regularly ask our Business Partners to self-certify their compliance with the principles in our 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 our Business Partner Code. Our supply agreements also contain representations that our 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 our 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.

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

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