BUSINESS PARTNER

OF

CONDUCT

CODE
Do the right thing.

These four words are our core value here at The Clorox Company. They’ve shaped how we do business from our founding in 1913 through today. And they guide my personal decisions every day. At Clorox, we know that honest and ethical business practices and treating people with dignity, respect and equal opportunity are the foundation of our long-term success.

This is how we build trust — within and outside Clorox.

Our commitment to responsible business practices and responsible sourcing for our products extends beyond the expectations outlined in our Code of Conduct for The Clorox Company and our wholly-owned subsidiaries to include our business partners. We expect the business practices of our partners to reflect our own values and standards.

And to make sure our expectations are clear to everyone, we have developed a Business Partner Code of Conduct. It details business practice standards for our direct suppliers of goods, service providers, consultants, distributors, licensees, joint ventures, contractors and temporary workers.

Our Business Partner Code of Conduct (Code) also supports our environmental, social and governance (ESG) commitments related to human rights and labor, respectful treatment and equal opportunity, anti-corruption, and environmental sustainability. Effectively implementing sustainability is a long-held principle of Clorox, and our Code is grounded in international standards and best practices, including the International Labor 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 thoroughly, and make sure you understand Clorox’s expectations of you as our business partner.

I believe that a business relationship rooted in integrity, and based on the Clorox core value to “do the right thing,” is essential to the long-term success of our businesses.

Benno Dorer
Chair & Chief Executive Officer
WHAT IS THE CODE?

Who must comply with it?

What are the consequences for violations?
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 ESG goals as well as the Ten Principles of the United Nations Global Compact, to which we are a signatory. The UNGC’s Ten Principles are derived from the Universal Declaration of 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 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 business partners assisting with Clorox business meet or exceed the principles set forth in the Code.

The Code sets minimum standards that our business partners must 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 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. In order 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.

Clorox may periodically request business partners and their workers to attend trainings on legal or compliance topics conducted by Clorox or on Clorox’s behalf. Failure to make reasonable efforts to participate in such trainings upon request is a violation of the Code.

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.
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, should immediately report such conduct to Clorox. Business partners, including their employees, may contact Clorox directly via either (1) the Clorox employee with whom they have a working relationship or (2) the Clorox Compliance Hotline, which allows for confidential reporting where permitted by law.

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

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

SOUTH AFRICA
800-44-4460

UNITED KINGDOM & NORTHERN IRELAND
0808-234-3903

Callers from other countries should consult the international toll-free number with the dialing instructions listed on www.cloroxhotline.com.

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

Ask questions or report concerns by e-mail
cloroxcompliance@alertline.com

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
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.

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 report in good faith possible violations of the law or the Code to Clorox, law enforcement or government agencies. Nor may business partners retaliate against their workers for cooperating with or participating in good faith in any investigation of actual or potential business misconduct or Code of 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 assessing and monitoring 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.

To manage risk in the supply chain, we use various third-party audit criteria to help evaluate suppliers’ overall compliance in areas such as, responsible sourcing, quality, safety and environmental compliance.
WHAT

DOES THE

REQUIRE

ME TO DO?

CODE
ETHICAL & RESPONSIBLE.
Human rights and labor

Prohibit harassment, discrimination or inhumane treatment: Business partners must provide a workplace free from discrimination, harassment, and abuse. 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 and acceptable living conditions. Business partners must not discriminate against any person on the basis of any self-identified or perceived association with a category protected by applicable law and are encouraged to demonstrate a commitment to building and maintaining a diverse workforce.

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. Business partners must pay their workers in a timely manner and convey the basis on which workers are being paid.

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. Business partners must respect the rights of workers to communicate openly with management or with each other regarding working conditions without fear of retaliation, harassment, intimidation, penalty or interference.

Prohibit human trafficking and slavery: Business partners must evaluate and mitigate risks of human trafficking and slavery in their operations, and must not produce goods or services for Clorox using forced, involuntary 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 identify or immigration documents; (vii) the imposition of unreasonable restrictions on workers’ freedom of movement; (viii) the demand that any worker pay for their job; 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.

Forbid unlawful child labor: Business partners must comply with all applicable child labor laws, including laws governing minimum age requirements and hazardous work and business partners must not employ individuals under the age of 14 (unless such work is permitted by local laws or applicable portions of the ILO Declaration on Fundamental Principles and Rights at Work). 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.

Clorox’s business partners must respect the human rights of workers and must treat all workers with dignity. Clorox business partners must:
What does the Code require me to do?

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

### Health and safety

**Establish regulatory requirement 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, training and warnings. Business partners must post Safety Data Sheets for any hazardous or toxic substances used in the workplace.

**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 personal protective equipment. Physical guards, interlocks and barriers should be provided and properly 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.

**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.

**Prepare for emergencies and their response:** Business partners must anticipate, identify and assess emergency situations and events, and minimize their impact by implementing emergency plans and response procedures, including worker notification and evacuation procedures, worker training and drills, appropriate fire detection and suppression equipment, adequate exit facilities and first-aid supplies.
Environment

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:

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 Congo and surrounding countries, or from other countries designated as part of a conflict region, including providing relevant documentation upon request.

Conserve natural resources and reduce environmental footprints: Business partners must operate in a sustainable manner consistent with reducing the environmental impact of their operations and encouraging their own suppliers and business partners to do the same. 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.

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. In order to facilitate these reductions, business partners should adopt policies addressing topics such as energy 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.

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 legally authorized disposal of such materials, if not by themselves, through licensed third parties. 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.

Respond to sustainability reporting requests: Clorox strives toward greater traceability of our supply chain to assess and monitor associated risks. We expect existing and potential suppliers and other business partners to support our reporting and traceability initiatives to comply with the Code. This includes responding to our information requests regarding sustainability commitments and progress — such as environmental footprint reporting, supply chain traceability 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 suppliers and other business partners in fields 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 sustainability goals, we may implement corrective steps to address these concerns, including education, formal warnings and, when warranted, termination of the relationship.

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.

Minimize packaging and shipping impact: Business partners should identify methods to eliminate or minimize the amount of packaging 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.
INTEGRITY.
Business conduct and ethics

**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 illegal payments or engage in corruption**: Business partners must not pay or offer to pay anything of value directly or indirectly to any government official or any other person for the purpose of improperly influencing such person or obtaining or retaining business or a 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, political party or official, candidate for political office; (iii) officer or employee of a public international organization, such as the World Health Organization or World Bank; (iv) any private person acting temporarily in an official capacity; or (v) the spouse or immediate family members of any of the persons mentioned above. Business partners must fully comply with the U.S. Foreign Corrupt Practices Act, the UK Bribery Act 2010 and any other applicable corruption laws. Business partners also may not accept or request any unlawful payments or things 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 under applicable law or regulation and approved in advance by Clorox.

**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 general contracting**: Business partners must compete fairly and ethically for all business opportunities. Business partners must ensure that all statements, communications and representations to Clorox are accurate and truthful.

**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 without prior written authorization from Clorox.

**Comply with securities and insider trading laws**: Business partners that possess non-public 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 the best interest of Clorox. 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 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 beyond that of 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. 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.

Data privacy and security: 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. Business partners must take appropriate steps to safeguard confidentiality and privacy of personal information of individuals. 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 Clorox’s expectations based on the business relationship with Clorox.
DO THE RIGHT THING.