

Welcome to your CDP Forests Questionnaire 2021

F0. Introduction

F0.1

(F0.1) Give a general description of and introduction to your organization.

The Clorox Company (NYSE: CLX) is a leading multinational manufacturer and marketer of consumer and professional products with about 8,800 employees worldwide and fiscal year 2020 sales of \$6.7 billion. Clorox markets some of the most trusted and recognized consumer brand names, including its namesake bleach and cleaning products; Pine-Sol® cleaners; Liquid-Plumr® clog removers; Poett® home care products; Fresh Step® cat litter; Glad® bags and wraps; Kingsford® charcoal; Hidden Valley® dressings and sauces; Brita® water-filtration products; Burt's Bees® natural personal care products; and RenewLife®, Rainbow Light®, Natural Vitality Calm™, NeoCell® and Stop Aging Now® vitamins, minerals and supplements. The company also markets industry-leading products and technologies for professional customers, including those sold under the CloroxPro™ and Clorox Healthcare® brand names. More than 80% of the company's sales are generated from brands that hold the No. 1 or No. 2 market share positions in their categories.

Clorox is a signatory of the United Nations Global Compact and the Ellen MacArthur Foundation's New Plastics Economy Global Commitment. The company has been broadly recognized for its corporate responsibility efforts, named to the 2020 Axios Harris Poll 100 reputation rankings, Barron's 2020 100 Most Sustainable Companies list, and the Human Rights Campaign's 2020 Corporate Equality Index, among others. In support of its communities, The Clorox Company and its foundations contributed more than \$25 million in combined cash grants, product donations and cause marketing in fiscal year 2020. For more information, visit [TheCloroxCompany.com](https://www.TheCloroxCompany.com), including the Good Growth blog, and follow the company on Twitter at @CloroxCo.

Our commitment to environmental sustainability shows up in all parts of our business every day. Since 2008, we've made it a top priority to go beyond environmental compliance and begin a long-term journey to reduce the footprint of our operations, improve the sustainability of our products and packaging, and enhance the transparency and sustainability progress in our upstream supply chain, which involves ingredients and materials that go into our products and packaging.

In 2019, as part of our IGNITE strategy, we unveiled an ambitious set of new environmental goals to advance our progress in this area. These goals, known as our IGNITE Environmental, Social, and Governance (ESG) planet goals, build on our previous 2020 strategy and call for us to demonstrate leadership in plastic and other waste reduction and science-based climate action, as we continue to uphold our commitments to water stewardship, responsible sourcing



and other material reduction innovations to reduce material, water, and transportation footprints of our products during consumer use and at the end of life.

Our IGNITE ESG goals include commitments such as a 50% combined reduction in virgin plastic and fiber packaging and 100% recyclable, reusable, or compostable packaging. As we pursue these goals, Clorox is also committed to reducing our greenhouse gas emissions through our Climate goals and driving efficiency improvements that minimize our use of energy and water generation of waste in our global operations.

To accelerate our progress and drive Purpose Given Growth – growth that’s profitable, sustainable and responsible – we’ve also re-imagined how we work to drive sustainability deeper into our brands and organization. With a business-led vision for sustainability, enabled by our passionate Sustainability Center, and activated by all employees across the company, sustainability is embedded into all aspects of our business and is everyone’s responsibility. In conjunction with our new ESG strategy and our Environmental Policy, we refreshed our palm oil commitments to ensure respect for human and labor rights, local communities and biodiversity in the palm oil supply chain. Clorox’s integrated IGNITE Strategy puts environmental, social and governance (ESG) priorities at the forefront of our decision-making to ensure Clorox remains a leader in corporate responsibility.

F0.2

(F0.2) State the start and end date of the year for which you are reporting data.

	Start Date	End Date
Reporting year	January 1, 2020	December 31, 2020

F0.3

(F0.3) Select the currency used for all financial information disclosed throughout your response.

USD

F0.4

(F0.4) Select the forest risk commodity(ies) that you are, or are not, disclosing on (including any that are sources for your processed ingredients or manufactured goods); and for each select the stages of the supply chain that best represents your organization’s area of operation.

	Commodity disclosure	Stage of the value chain	Explanation if not disclosing
Timber products	Disclosing	Manufacturing	
Palm oil	Disclosing	Manufacturing	
Cattle products	Not disclosing	Manufacturing	The only known cattle commodities in our supply chain are buttermilk used in some of our Food products produced in the U.S. and collagen used by our vitamins, minerals, and supplements (VMS)

			<p>business. The buttermilk ingredients are made from milk produced primarily in the U.S., with potential for some to be sourced in Canada, where there is little known deforestation risk. We purchase small volumes of collagen for our VMS business. We plan to map our collagen supply chain in FY22. Based on the low volumes, we will not be reporting on this commodity at this time.</p>
Soy	Not disclosing	Manufacturing	<p>We use Soy bean oil in some of our Food product lines and cosmetics. The soy bean oil we purchase directly is produced in the US, with the vast majority made from soy beans grown in the US. For the fraction of soy bean oil we purchase that is made from soy beans grown outside the US (but oil produced in the US), we estimate the volume to be less than 1%, all of which is sourced from soy beans grown in Canada, all of which has low deforestation risk associated with it.</p> <p>We use soy derivative ingredients in some of our formulas, such as derivative ingredients that extend the shelf life of some of our Food and natural personal care products. These soy derivatives in aggregate, represent small volumes of soy, with minimal deforestation risk being sourced from suppliers in the US.</p> <p>The volumes we purchase are very small and we expect to be able to continue to source soy bean oil from these same regions with minimal deforestation risk. Although our volumes are small, Clorox participated in the United Soy Bean (USB) Phase 1 Project, soybean mapping exercise with Earthworm to understand overall traceability of the supply chain in the U.S. Clorox will disclose in the future, if, in the event supply issues require sourcing Soy bean oil from outside the US in regions where deforestation is a higher risk. At that point we will provide information on how we would mitigate potential deforestation through mechanisms such as certified sustainable soy material.</p>
Other - Rubber	This commodity is not produced, sourced or used by our organization		

Other - Cocoa	This commodity is not produced, sourced or used by our organization		
Other - Coffee	This commodity is not produced, sourced or used by our organization		

F0.5

(F0.5) Are there any parts of your direct operations or supply chain that are not included in your disclosure?

No

F1. Current state

F1.1

(F1.1) How does your organization produce, use or sell your disclosed commodity(ies)?

Timber products

Activity

- Using as input into product manufacturing
- Distributing/packaging

Form of commodity

- Pulp
- Primary packaging
- Secondary packaging
- Cellulose-based textile fiber
- Other, please specify
 - Mill wood residuals and by-products

Source

- Contracted suppliers (manufacturers)

Country/Area of origin

- Argentina
- Canada
- Chile
- China
- Colombia

Italy
Mexico
Peru
Philippines
Sweden
Switzerland
United States of America

% of procurement spend

1-5%

Comment

We use paper-based primary and secondary packaging for several product categories. These include cartons, corrugate and paper-based bags. The majority of these paper-based packaging materials are sourced in the U.S., with the balance sourced in Latin America and Asia to support products produced in those regions.

The substrates for our Wipes product lines contain paper-based pulp or cellulose-based textile fiber. Although we don't purchase this fiber directly, these timber-based materials are sourced largely from the U.S. and approximately 97 percent of the tree-based material in our wipes is from certified sources. Our Kingsford Manufacturing Division uses mill wood residuals and by-products in its manufacturing process to create charcoal briquettes. By using residual and by-product wood, we are able to minimize our footprint by not cutting down trees to be utilized in the manufacturing process. We also source some mesquite wood char for one of our charcoal product lines. The wood used in the Kingsford business is sourced in the U.S.

Palm oil

Activity

Using as input into product manufacturing

Form of commodity

Refined palm oil
Palm oil derivatives
Palm kernel oil derivatives

Source

Contracted suppliers (manufacturers)

Country/Area of origin

Brazil
Cambodia
Cameroon
Colombia
Costa Rica
Ecuador
Gabon
Guatemala



- Honduras
- Indonesia
- Malaysia
- Mexico
- Nigeria
- Panama
- Papua New Guinea
- Solomon Islands
- Thailand

% of procurement spend

1-5%

Comment

The company’s use of palm oil ingredients is largely limited to derivatives of palm and palm kernel oil, with derivatives representing more than 99% of palm oil and palm kernel oil consumed in 2020. Typically present in very small percentages as sub-components of surfactants, fatty alcohols, emulsifiers or fragrances, palm oil derivatives are used in some of our bio-based and conventional cleaning products, food flavorings and fragrances as well as natural personal care products such as cleansers, lotions, shampoos and soaps. In 2020 we traced our 2019 volume, achieving a 96.3 percent traceability to the origin refiner and 97.3 percent traceability to the mill for our priority suppliers, which represented 82 percent of our palm oil derivative purchases.

F1.2

(F1.2) Indicate the percentage of your organization’s revenue that was dependent on your disclosed forest risk commodity(ies) in the reporting year.

	% of revenue dependent on commodity	Comment
Timber products	91-99%	We use paper based primary and secondary packaging for most of our product categories. These include cartons, corrugate and paper-based bags. The substrates for our Wipes product lines contain paper-based pulp. Our Kingsford Manufacturing Division uses mill wood residuals and by-products in its manufacturing process to create charcoal briquettes, as well as some mesquite wood char for one of our charcoal product lines. All of the wood used in the Kingsford business is sourced in the U.S. This percentage of revenue represents an estimate of the revenues generated by products that fall under at least one of these categories.
Palm oil	41-50%	We estimate that Clorox’s total palm oil ingredient volume represents less than 0.003 percent of palm oil produced globally each year, and our sourcing is limited to 99% derivatives of palm and palm kernel oil. Typically present in very small percentages as sub-components of surfactants, fatty alcohols, emulsifiers or fragrances, palm oil

		derivatives are used in some cleaning products, food flavorings and fragrances as well as small volumes of natural personal care products.
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F1.5

(F1.5) Does your organization collect production and/or consumption data for your disclosed commodity(ies)?

	Data availability/Disclosure
Timber products	Consumption data available, disclosing
Palm oil	Consumption data available, disclosing

F1.5a

(F1.5a) Disclose your production and/or consumption data.

Forest risk commodity

Timber products

Data type

Consumption data

Volume

1,000,000

Metric

Metric tons

Data coverage

Full commodity production/consumption

Please explain

Forest risk commodity

Palm oil

Data type

Consumption data

Volume

2,076

Metric

Metric tons

Data coverage

Partial commodity production/consumption

Please explain

Clorox does not source any crude Palm Oil or Palm Kernel Oil, but a very small volume of refined palm oil. Volume represents palm oil and palm oil in derivative ingredients sourced directly by the company for products produced globally. The reported volume does not include material sourced by contract manufacturers producing turn-key products. We estimate that this reported volume represents more than 85% of global palm oil material consumed in all products sold by Clorox.

F1.5b

(F1.5b) For your disclosed commodity(ies), indicate the percentage of the production/consumption volume sourced by national and/or sub-national jurisdiction of origin.

Forest risk commodity

Timber products

Country/Area of origin

Argentina

State or equivalent jurisdiction

Specify state/equivalent jurisdiction
Not specified by Supplier

% of total production/consumption volume

0.6

Please explain

This number is calculated as a percentage of our total global timber footprint, which includes packaging, wipes fiber, and wood by-product. Our timber commodities sourced from Argentina are limited to packaging fiber. Fiber sourced from Argentina makes up approximately 4.1% of our total global packaging fiber volume and we have verified through our annual Fiber Certification Survey that this volume is almost 99% certified virgin or recycled fiber.

We use paper-based primary and secondary packaging for several product categories. These include cartons, corrugate and paper-based bags. The majority of these paper-based packaging materials are sourced in the U.S., with most of the rest sourced in Latin America and Asia to support products produced in those regions.

The substrates for our Wipes product lines contain paper-based pulp or cellulose-based textile fiber. Although we don't purchase this fiber directly, these timber-based materials are sourced largely from the U.S. and approximately 97 percent of the tree-based material in our wipes are from certified sources. Our Kingsford Manufacturing Division uses mill wood residuals and by-products in its manufacturing process to create charcoal briquettes. By using residual and by-product wood, we are able to minimize our footprint by not cutting down trees to be utilized in the manufacturing process. We also



source some mesquite wood char for one of our charcoal product lines. All of the wood used in the Kingsford business is sourced in the U.S.

Forest risk commodity

Timber products

Country/Area of origin

Colombia

State or equivalent jurisdiction

Specify state/equivalent jurisdiction

Not specified by Supplier

% of total production/consumption volume

0.2

Please explain

This number is calculated as a percentage of our total global timber footprint, which includes packaging fiber, wipes fiber, and wood by-product. Our Timber commodities sourced from Columbia are limited to packaging fiber. Fiber sourced from Colombia makes up approximately 1.2% of our total global packaging fiber volume and we have verified through our annual Fiber Certification Survey that this volume is more than 99% certified virgin or recycled fiber.

We use paper-based primary and secondary packaging for several product categories. These include cartons, corrugate and paper-based bags. The majority of these paper-based packaging materials are sourced in the U.S., with the majority of the balance sourced in Latin America and Asia to support products produced in those regions. The substrates for our Wipes product lines contain paper-based pulp or cellulose-based textile fiber. Although we don't purchase this fiber directly, these timber-based materials are sourced largely from the U.S. and approximately 97 percent of the tree-based material in our wipes are from certified sources.

Our Kingsford Manufacturing Division uses mill wood residuals and by-products in its manufacturing process to create charcoal briquettes. By using residual and by-product wood, we are able to minimize our footprint by not cutting down trees to be utilized in the manufacturing process. We also source some mesquite wood char for one of our charcoal product lines. The wood used in the Kingsford business is sourced in the U.S.

Forest risk commodity

Timber products

Country/Area of origin

Mexico

State or equivalent jurisdiction

Specify state/equivalent jurisdiction



Not specified by Supplier

% of total production/consumption volume

0.4

Please explain

This number is calculated as a percentage of our total global timber footprint, which includes packaging fiber, wipes fiber, and wood by-product. Our Timber commodities sourced from Mexico are limited to packaging fiber. . Fiber sourced from Mexico makes up approximately 2.4% of our total global packaging fiber volume and we have verified through our annual Fiber Certification Survey that this volume is 100% certified virgin or recycled fiber

We use paper-based primary and secondary packaging for several product categories. These include cartons, corrugate and paper-based bags. The majority of these paper-based packaging materials are sourced in the U.S., with the majority of the balance sourced in Latin America and Asia to support products produced in those regions
 The substrates for our Wipes product lines contain paper- based pulp or cellulose-based textile fiber. Although we don't purchase this fiber directly, these timber-based materials are sourced largely from the U.S. and approximately 97 percent of the tree-based material in our wipes are from certified sources.
 Our Kingsford Manufacturing Division uses mill wood residuals and by-products in its manufacturing process to create charcoal briquettes. By using residual and by-product wood, we are able to minimize our footprint by not cutting down trees to be utilized in the manufacturing process. We also source some mesquite wood char for one of our charcoal product lines. The wood used in the Kingsford business is sourced in the U.S.

Forest risk commodity

Timber products

Country/Area of origin

Peru

State or equivalent jurisdiction

Specify state/equivalent jurisdiction
 Supplier didn't specify

% of total production/consumption volume

0.07

Please explain

This number is calculated as a percentage of our total global timber footprint, which includes packaging fiber, wipes fiber, and wood by-product. Our Timber commodities sourced from Peru are limited to packaging fiber. Fiber sourced from Peru makes up approximately 0.5% of our total global packaging fiber volume and we have verified through our annual Fiber Certification Survey that this volume is nearly 90% certified virgin or recycled fiber

We use paper-based primary and secondary packaging for several product categories. These include cartons, corrugate and paper-based bags. The majority of these paper-based packaging materials are sourced in the U.S., with the majority of the balance sourced in Latin America and Asia to support products produced in those regions. The substrates for our Wipes product lines contain paper-based pulp or cellulose-based textile fiber. Although we don't purchase this fiber directly, these timber-based materials are sourced largely from the U.S. and approximately 97 percent of the tree-based material in our wipes are from certified sources. Our Kingsford Manufacturing Division uses mill wood residuals and by-products in its manufacturing process to create charcoal briquettes. By using residual and by-product wood, we are able to minimize our footprint by not cutting down trees to be utilized in the manufacturing process. We also source some mesquite wood char for one of our charcoal product lines. The wood used in the Kingsford business is sourced in the U.S.

Forest risk commodity

Timber products

Country/Area of origin

Philippines

State or equivalent jurisdiction

Specify state/equivalent jurisdiction
 Not specified by Supplier

% of total production/consumption volume

0.01

Please explain

This number is calculated as a percentage of our total global timber footprint, which includes packaging fiber, wipes fiber, and wood by-product. Our Timber commodities sourced from Philippines are limited to packaging fiber. Fiber sourced from Philippines makes up approximately 0.1% of our total global packaging fiber volume and we have verified through our annual Fiber Certification Survey that this volume is 100% certified virgin or recycled fiber

We use paper-based primary and secondary packaging for several product categories. These include cartons, corrugate and paper-based bags. The majority of these paper-based packaging materials are sourced in the U.S., with the balance sourced in Latin America and Asia to support products produced in those regions. The substrates for our Wipes product lines contain paper-based pulp or cellulose-based textile fiber. Although we don't purchase this fiber directly, these timber-based materials are sourced largely from the U.S. and approximately 97 percent of the tree-based material in our wipes are from certified sources. Our Kingsford Manufacturing Division uses mill wood residuals and by-products in its manufacturing process to create charcoal briquettes. By using residual and by-product wood, we are able to minimize our

footprint by not cutting down trees to be utilized in the manufacturing process. We also source some mesquite wood char for one of our charcoal product lines. The wood used in the Kingsford business is sourced in the U.S.

Forest risk commodity

Timber products

Country/Area of origin

Any other countries/areas

State or equivalent jurisdiction

% of total production/consumption volume

98.72

Please explain

Of the countries listed in 1.1 but not reported in detail, above, 98.72% comes from the following:

- US makes up approximately 97.07% of our timber consumption (88.3% of our total global packaging fiber volume, that is nearly 99% certified virgin or recycled fiber)
- China makes up 1.49% of our timber consumption (2.4% of our total global packaging fiber volume, 100% is certified virgin or recycled fiber).
- Switzerland makes up approximately 0.12% of our timber consumption (0.75% of our total global packaging fiber volume, 100% is certified virgin or recycled fiber)
- Canada makes up approximately 0.003% of our timber consumption, more than 99% is certified virgin or recycled fiber)
- Chile makes up 0.01% of our timber consumption (0.1% of our total global packaging fiber volume, 100% is certified virgin or recycled fiber).
- Italy makes up approximately 0.002% of our timber consumption (0.01 % of our total global packaging fiber volume, 100% is certified virgin or recycled fiber)
- Sweden makes up approximately 0.03% of our timber consumption (0.18 % of our total global packaging fiber volume, 0% is certified virgin or recycled fiber)

This data was verified through our annual Fiber Certification Survey.

We use paper-based primary and secondary packaging for several product categories. These include cartons, corrugate and paper-based bags. The majority of these paper-based packaging materials are sourced in the U.S., with the most of the rest sourced in Latin America and Asia to support products produced in those regions.

The substrates for our Wipes product lines contain paper- based pulp or cellulose-based textile fiber. Although we don't purchase this fiber directly, these timber-based materials are sourced largely from the U.S. and approximately 97 percent of the tree-based material in our wipes are from certified sources.

Our Kingsford Manufacturing Division uses mill wood residuals and by-products in its manufacturing process to create charcoal briquettes. By using residual and by-product wood, we are able to minimize our footprint by not cutting down trees to be utilized in the manufacturing process. We also source some mesquite wood char for one of our charcoal product lines. The wood used in the Kingsford business is sourced in the U.S.

Forest risk commodity

Palm oil

Country/Area of origin

Brazil

State or equivalent jurisdiction

Specify state/equivalent jurisdiction

Para

% of total production/consumption volume

0.02

Please explain

In 2020 we traced 82% of our 2019 global business palm oil derivative purchases (e.g. priority suppliers providing more than 50MT of volume), achieving a 96.3% traceability to the origin refiner and a 97.3% traceability to the mill.

Actual country and province volume data is not available at this level of detail. Therefore, the percent of total production/consumption volume reported is based on the number of times mills in a given country and province appear in the sourcing data across our priority suppliers as traced by the Earthworm Foundation. The tracing was conducted across multiple tier levels (Tier 1 through Tier 5) and includes suppliers, first aggregator/origin refiner and the additional origin refiner allowing us to identify the region/province of the country where our palm derivatives are sourced.

The company's sourcing of palm oil ingredients is limited to 99% derivatives of palm and palm kernel oil. Typically present in very small percentages as sub-components of surfactants, fatty alcohols, emulsifiers or fragrances, palm oil derivatives are used in some cleaning products, food flavorings and fragrances as well as some small volumes of natural personal care products.

A comprehensive risk assessment was performed in 2018, identifying High Impact Suppliers, and continues to be a useful tool to engage with our priority suppliers to bring visibility to their supply chains and support landscape level initiatives.

Forest risk commodity

Palm oil

Country/Area of origin

Cambodia

State or equivalent jurisdiction

Specify state/equivalent jurisdiction

2 Provinces: Sihanouk; Kaoh Kong

% of total production/consumption volume

0.1

Please explain

In 2020 we traced 82% of our 2019 global business palm oil derivative purchases (e.g. priority suppliers providing more than 50MT of volume), achieving a 96.3% traceability to the origin refiner and a 97.3% traceability to the mill.

The total for Cambodia is from 2 province s;

Sihanouk - 0.07%,

Kaoh Kong - 0.03%

Actual country and province volume data is not available at this level of detail.

Therefore, the percent of total production/consumption volume reported is based on the number of times mills in a given country and province appear in the sourcing data across our priority suppliers as traced by the Earthworm Foundation. The tracing was conducted across multiple tier levels (Tier 1 through Tier 5) and includes suppliers, first aggregator/origin refiner and the additional origin refiner allowing us to identify the region/province of the country where our palm derivatives are sourced.

The company's sourcing of palm oil ingredients is limited to 99% derivatives of palm and palm kernel oil. Typically present in very small percentages as sub-components of surfactants, fatty alcohols, emulsifiers or fragrances, palm oil derivatives are used in some cleaning products, food flavorings and fragrances as well as some small volumes of natural personal care products.

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Forest risk commodity

Palm oil

Country/Area of origin

Cameroon

State or equivalent jurisdiction

Specify state/equivalent jurisdiction

Littoral

% of total production/consumption volume

0.01

Please explain

In 2020 we traced 82% of our 2019 global business palm oil derivative purchases (e.g. priority suppliers providing more than 50MT of volume), achieving a 96.3% traceability to the origin refiner and a 97.3% traceability to the mill.

Actual country and province volume data is not available at this level of detail. Therefore, the percent of total production/consumption volume reported is based on the number of times mills in a given country and province appear in the sourcing data across our priority suppliers as traced by the Earthworm Foundation. The tracing was conducted across multiple tier levels (Tier 1 through Tier 5) and includes suppliers, first aggregator/origin refiner and the additional origin refiner allowing us to identify the region/province of the country where our palm derivatives are sourced.

The company's sourcing of palm oil ingredients is limited to 99% derivatives of palm and palm kernel oil. Typically present in very small percentages as sub-components of surfactants, fatty alcohols, emulsifiers or fragrances, palm oil derivatives are used in some cleaning products, food flavorings and fragrances as well as some small volumes of natural personal care products.

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Forest risk commodity

Palm oil

Country/Area of origin

Colombia

State or equivalent jurisdiction

Specify state/equivalent jurisdiction

10 provinces: Meta, Santander, Cesar, Magdalena, Casanare, Bolivar, Norte De Santander, Antioquia, Cundinamarca,

% of total production/consumption volume

0.6

Please explain

In 2020 we traced 82% of our 2019 global business palm oil derivative purchases (e.g. priority suppliers providing more than 50MT of volume), achieving a 96.3% traceability to the origin refiner and a 97.3% traceability to the mill.

The total for Columbia is from 10 provinces:

Meta - 0.19%,

Santander - 0.09%,

Cesar - 0.08%,

Magdalena - 0.07%,

Casanare - 0.06%,

Bolivar - 0.04%,

Norte De Santander - 0.02%,



Antioquia - 0.01%,
 Cundinamarca - 0.01%,
 Narino - 0.01%,

Actual country and province volume data is not available at this level of detail. Therefore, the percent of total production/consumption volume reported is based on the number of times mills in a given country and province appear in the sourcing data across our priority suppliers as traced by the Earthworm Foundation. The tracing was conducted across multiple tier levels (Tier 1 through Tier 5) and includes suppliers, first aggregator/origin refiner and the additional origin refiner allowing us to identify the region/province of the country where our palm derivatives are sourced.

The company's sourcing of palm oil ingredients is limited to 99% derivatives of palm and palm kernel oil. Typically present in very small percentages as sub-components of surfactants, fatty alcohols, emulsifiers or fragrances, palm oil derivatives are used in some cleaning products, food flavorings and fragrances as well as some small volumes of natural personal care products.

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Forest risk commodity

Palm oil

Country/Area of origin

Ecuador

State or equivalent jurisdiction

Specify state/equivalent jurisdiction
 Esmeraldas

% of total production/consumption volume

0.01

Please explain

In 2020 we traced 82% of our 2019 global business palm oil derivative purchases (e.g. priority suppliers providing more than 50MT of volume), achieving a 96.3% traceability to the origin refiner and a 97.3% traceability to the mill.

Actual country and province volume data is not available at this level of detail. Therefore, the percent of total production/consumption volume reported is based on the number of times mills in a given country and province appear in the sourcing data across our priority suppliers as traced by the Earthworm Foundation. The tracing was conducted across multiple tier levels (Tier 1 through Tier 5) and includes suppliers, first aggregator/origin refiner and the additional origin refiner allowing us to identify the region/province of the country where our palm derivatives are sourced.



The company's sourcing of palm oil ingredients is limited to 99% derivatives of palm and palm kernel oil. Typically present in very small percentages as sub-components of surfactants, fatty alcohols, emulsifiers or fragrances, palm oil derivatives are used in some cleaning products, food flavorings and fragrances as well as some small volumes of natural personal care products.

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Forest risk commodity

Palm oil

Country/Area of origin

Gabon

State or equivalent jurisdiction

Specify state/equivalent jurisdiction
2 provinces: Estuaire, Ngounie,

% of total production/consumption volume

0.06

Please explain

In 2020 we traced 82% of our 2019 global business palm oil derivative purchases (e.g. priority suppliers providing more than 50MT of volume), achieving a 96.3% traceability to the origin refiner and a 97.3% traceability to the mill.

The total for Gabon is from 2 provinces:

Estuaire - 0.03%,

Ngounie - 0.03%,

Actual country and province volume data is not available at this level of detail.

Therefore, the percent of total production/consumption volume reported is based on the number of times mills in a given country and province appear in the sourcing data across our priority suppliers as traced by the Earthworm Foundation. The tracing was conducted across multiple tier levels (Tier 1 through Tier 5) and includes suppliers, first aggregator/origin refiner and the additional origin refiner allowing us to identify the region/province of the country where our palm derivatives are sourced.

The company's sourcing of palm oil ingredients is limited to 99% derivatives of palm and palm kernel oil. Typically present in very small percentages as sub-components of surfactants, fatty alcohols, emulsifiers or fragrances, palm oil derivatives are used in some cleaning products, food flavorings and fragrances as well as some small volumes of natural personal care products.

A comprehensive risk assessment was performed in 2018, identifying High Impact

Suppliers, and continues to be a useful tool to engage with our priority suppliers to bring visibility to their supply chains and support landscape level initiatives.

Forest risk commodity

Palm oil

Country/Area of origin

Guatemala

State or equivalent jurisdiction

Specify state/equivalent jurisdiction

4 provinces: Peten, Izabal, Alta Verapaz, Escuintla,

% of total production/consumption volume

0.13

Please explain

In 2020 we traced 82% of our 2019 global business palm oil derivative purchases (e.g. priority suppliers providing more than 50MT of volume), achieving a 96.3% traceability to the origin refiner and a 97.3% traceability to the mill.

The total for Guatemala is from 4 provinces:

Peten - 0.06%,

Izabal - 0.03%,

Alta Verapaz - 0.02%,

Escuintla - 0.01%,

Actual country and province volume data is not available at this level of detail.

Therefore, the percent of total production/consumption volume reported is based on the number of times mills in a given country and province appear in the sourcing data across our priority suppliers as traced by the Earthworm Foundation. The tracing was conducted across multiple tier levels (Tier 1 through Tier 5) and includes suppliers, first aggregator/origin refiner and the additional origin refiner allowing us to identify the region/province of the country where our palm derivatives are sourced.

The company's sourcing of palm oil ingredients is limited to 99% derivatives of palm and palm kernel oil. Typically present in very small percentages as sub-components of surfactants, fatty alcohols, emulsifiers or fragrances, palm oil derivatives are used in some cleaning products, food flavorings and fragrances as well as some small volumes of natural personal care products.

A comprehensive risk assessment was performed in 2018, identifying High Impact Suppliers, and continues to be a useful tool to engage with our priority suppliers to bring visibility to their supply chains and support landscape level initiatives.

Forest risk commodity

Palm oil

Country/Area of origin

Honduras

State or equivalent jurisdiction

Specify state/equivalent jurisdiction

4 provinces: Colon, Atlantida, Yoro, Cortes,

% of total production/consumption volume

0.2

Please explain

In 2020 we traced 82% of our 2019 global business palm oil derivative purchases (e.g. priority suppliers providing more than 50MT of volume), achieving a 96.3% traceability to the origin refiner and a 97.3% traceability to the mill.

The total for Honduras is from 4 provinces:

Colon - 0.08%,

Atlantida - 0.06%,

Yoro - 0.03%,

Cortes - 0.02%,

Actual country and province volume data is not available at this level of detail.

Therefore, the percent of total production/consumption volume reported is based on the number of times mills in a given country and province appear in the sourcing data across our priority suppliers as traced by the Earthworm Foundation. The tracing was conducted across multiple tier levels (Tier 1 through Tier 5) and includes suppliers, first aggregator/origin refiner and the additional origin refiner allowing us to identify the region/province of the country where our palm derivatives are sourced.

The company's sourcing of palm oil ingredients is limited to 99% derivatives of palm and palm kernel oil. Typically present in very small percentages as sub-components of surfactants, fatty alcohols, emulsifiers or fragrances, palm oil derivatives are used in some cleaning products, food flavorings and fragrances as well as some small volumes of natural personal care products.

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Forest risk commodity

Palm oil

Country/Area of origin

Indonesia

State or equivalent jurisdiction

Specify state/equivalent jurisdiction

Riau

% of total production/consumption volume

14.84

Please explain

In 2020 we traced 82% of our 2019 global business palm oil derivative purchases (e.g. priority suppliers providing more than 50MT of volume), achieving a 96.3% traceability to the origin refiner and a 97.3% traceability to the mill.

Actual country and province volume data is not available at this level of detail. Therefore, the percent of total production/consumption volume reported is based on the number of times mills in a given country and province appear in the sourcing data across our priority suppliers as traced by the Earthworm Foundation. The tracing was conducted across multiple tier levels (Tier 1 through Tier 5) and includes suppliers, first aggregator/origin refiner and the additional origin refiner allowing us to identify the region/province of the country where our palm derivatives are sourced.

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Forest risk commodity

Palm oil

Country/Area of origin

Indonesia

State or equivalent jurisdiction

Specify state/equivalent jurisdiction

Sumatera Utara

% of total production/consumption volume

13.3

Please explain

In 2020 we traced 82% of our 2019 global business palm oil derivative purchases (e.g. priority suppliers providing more than 50MT of volume), achieving a 96.3% traceability to the origin refiner and a 97.3% traceability to the mill.



Actual country and province volume data is not available at this level of detail. Therefore, the percent of total production/consumption volume reported is based on the number of times mills in a given country and province appear in the sourcing data across our priority suppliers as traced by the Earthworm Foundation. The tracing was conducted across multiple tier levels (Tier 1 through Tier 5) and includes suppliers, first aggregator/origin refiner and the additional origin refiner allowing us to identify the region/province of the country where our palm derivatives are sourced.

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Forest risk commodity

Palm oil

Country/Area of origin

Indonesia

State or equivalent jurisdiction

Specify state/equivalent jurisdiction
Kalimantan Tengah

% of total production/consumption volume

4.89

Please explain

In 2020 we traced 82% of our 2019 global business palm oil derivative purchases (e.g. priority suppliers providing more than 50MT of volume), achieving a 96.3% traceability to the origin refiner and a 97.3% traceability to the mill.

Actual country and province volume data is not available at this level of detail. Therefore, the percent of total production/consumption volume reported is based on the number of times mills in a given country and province appear in the sourcing data across our priority suppliers as traced by the Earthworm Foundation. The tracing was conducted across multiple tier levels (Tier 1 through Tier 5) and includes suppliers, first aggregator/origin refiner and the additional origin refiner allowing us to identify the region/province of the country where our palm derivatives are sourced.

The company's sourcing of palm oil ingredients is limited to 99% derivatives of palm and palm kernel oil. Typically present in very small percentages as sub-components of surfactants, fatty alcohols, emulsifiers or fragrances, palm oil derivatives are used in



some cleaning products, food flavorings and fragrances as well as some small volumes of natural personal care products.

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Forest risk commodity

Palm oil

Country/Area of origin

Indonesia

State or equivalent jurisdiction

Specify state/equivalent jurisdiction

Jambi

% of total production/consumption volume

4.87

Please explain

In 2020 we traced 82% of our 2019 global business palm oil derivative purchases (e.g. priority suppliers providing more than 50MT of volume), achieving a 96.3% traceability to the origin refiner and a 97.3% traceability to the mill.

Actual country and province volume data is not available at this level of detail. Therefore, the percent of total production/consumption volume reported is based on the number of times mills in a given country and province appear in the sourcing data across our priority suppliers as traced by the Earthworm Foundation. The tracing was conducted across multiple tier levels (Tier 1 through Tier 5) and includes suppliers, first aggregator/origin refiner and the additional origin refiner allowing us to identify the region/province of the country where our palm derivatives are sourced.

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Forest risk commodity

Palm oil



Country/Area of origin

Indonesia

State or equivalent jurisdiction

Specify state/equivalent jurisdiction
Kalimantan Barat

% of total production/consumption volume

4.36

Please explain

In 2020 we traced 82% of our 2019 global business palm oil derivative purchases (e.g. priority suppliers providing more than 50MT of volume), achieving a 96.3% traceability to the origin refiner and a 97.3% traceability to the mill.

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Forest risk commodity

Palm oil

Country/Area of origin

Indonesia

State or equivalent jurisdiction

Specify state/equivalent jurisdiction
Sumatera Selatan

% of total production/consumption volume

3.78

Please explain

In 2020 we traced 82% of our 2019 global business palm oil derivative purchases (e.g. priority suppliers providing more than 50MT of volume), achieving a 96.3% traceability to the origin refiner and a 97.3% traceability to the mill.

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Forest risk commodity

Palm oil

Country/Area of origin

Indonesia

State or equivalent jurisdiction

Specify state/equivalent jurisdiction
 Kalimantan Timur

% of total production/consumption volume

3.72

Please explain

In 2020 we traced 82% of our 2019 global business palm oil derivative purchases (e.g. priority suppliers providing more than 50MT of volume), achieving a 96.3% traceability to the origin refiner and a 97.3% traceability to the mill.

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Forest risk commodity

Palm oil

Country/Area of origin

Indonesia

State or equivalent jurisdiction

Specify state/equivalent jurisdiction
Aceh

% of total production/consumption volume

2.92

Please explain

In 2020 we traced 82% of our 2019 global business palm oil derivative purchases (e.g. priority suppliers providing more than 50MT of volume), achieving a 96.3% traceability to the origin refiner and a 97.3% traceability to the mill.

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Forest risk commodity

Palm oil

Country/Area of origin

Indonesia

State or equivalent jurisdiction

Specify state/equivalent jurisdiction
Sumatera Barat

% of total production/consumption volume

1.8

Please explain

In 2020 we traced 82% of our 2019 global business palm oil derivative purchases (e.g. priority suppliers providing more than 50MT of volume), achieving a 96.3% traceability to the origin refiner and a 97.3% traceability to the mill.

Actual country and province volume data is not available at this level of detail. Therefore, the percent of total production/consumption volume reported is based on the number of times mills in a given country and province appear in the sourcing data across our priority suppliers as traced by the Earthworm Foundation. The tracing was conducted across multiple tier levels (Tier 1 through Tier 5) and includes suppliers, first aggregator/origin refiner and the additional origin refiner allowing us to identify the region/province of the country where our palm derivatives are sourced.

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Forest risk commodity

Palm oil

Country/Area of origin

Indonesia

State or equivalent jurisdiction

Specify state/equivalent jurisdiction
Kalimantan Selatan



% of total production/consumption volume

1.57

Please explain

In 2020 we traced 82% of our 2019 global business palm oil derivative purchases (e.g. priority suppliers providing more than 50MT of volume), achieving a 96.3% traceability to the origin refiner and a 97.3% traceability to the mill.

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Forest risk commodity

Palm oil

Country/Area of origin

Indonesia

State or equivalent jurisdiction

Specify state/equivalent jurisdiction

Bengkulu

% of total production/consumption volume

1.2

Please explain

In 2020 we traced 82% of our 2019 global business palm oil derivative purchases (e.g. priority suppliers providing more than 50MT of volume), achieving a 96.3% traceability to the origin refiner and a 97.3% traceability to the mill.

Actual country and province volume data is not available at this level of detail. Therefore, the percent of total production/consumption volume reported is based on the number of times mills in a given country and province appear in the sourcing data



across our priority suppliers as traced by the Earthworm Foundation. The tracing was conducted across multiple tier levels (Tier 1 through Tier 5) and includes suppliers, first aggregator/origin refiner and the additional origin refiner allowing us to identify the region/province of the country where our palm derivatives are sourced.

The company's sourcing of palm oil ingredients is limited to 99% derivatives of palm and palm kernel oil. Typically present in very small percentages as sub-components of surfactants, fatty alcohols, emulsifiers or fragrances, palm oil derivatives are used in some cleaning products, food flavorings and fragrances as well as some small volumes of natural personal care products.

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Forest risk commodity

Palm oil

Country/Area of origin

Indonesia

State or equivalent jurisdiction

Specify state/equivalent jurisdiction

Bangka Belitung

% of total production/consumption volume

1.01

Please explain

In 2020 we traced 82% of our 2019 global business palm oil derivative purchases (e.g. priority suppliers providing more than 50MT of volume), achieving a 96.3% traceability to the origin refiner and a 97.3% traceability to the mill.

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Forest risk commodity

Palm oil

Country/Area of origin

Indonesia

State or equivalent jurisdiction

Specify state/equivalent jurisdiction

13 provinces: Lampung, Kalimantan Utara, Sulawesi Barat, Sulawesi Tengah, Kepulauan Riau, Papua, Sulawesi Utara, Papua Barat, Sulawesi Tenggara, Banten, Borneo Barat, Dumai, Sulawesi Selatan,

% of total production/consumption volume

2.11

Please explain

In 2020 we traced 82% of our 2019 global business palm oil derivative purchases (e.g. priority suppliers providing more than 50MT of volume), achieving a 96.3% traceability to the origin refiner and a 97.3% traceability to the mill.

We are reporting an additional 7.69% from Indonesia from the following 13 provinces:

- Lampung - 0.62%,
- Kalimantan Utara - 0.4%,
- Sulawesi Barat - 0.39%,
- Sulawesi Tengah - 0.38%,
- Kepulauan Riau - 0.07%,
- Papua - 0.06%,
- Sulawesi Utara - 0.05%,
- Papua Barat - 0.04%,
- Sulawesi Tenggara - 0.03%,
- Banten - 0.03%,
- Borneo Barat - 0.02%,
- Dumai - 0.01%,
- Sulawesi Selatan - 0.01%,

Actual country and province volume data is not available at this level of detail.

Therefore, the percent of total production/consumption volume reported is based on the number of times mills in a given country and province appear in the sourcing data across our priority suppliers as traced by the Earthworm Foundation. The tracing was conducted across multiple tier levels (Tier 1 through Tier 5) and includes suppliers, first aggregator/origin refiner and the additional origin refiner allowing us to identify the region/province of the country where our palm derivatives are sourced.

The company's sourcing of palm oil ingredients is limited to 99% derivatives of palm and

palm kernel oil. Typically present in very small percentages as sub-components of surfactants, fatty alcohols, emulsifiers or fragrances, palm oil derivatives are used in some cleaning products, food flavorings and fragrances as well as some small volumes of natural personal care products.

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Forest risk commodity

Palm oil

Country/Area of origin

Malaysia

State or equivalent jurisdiction

Specify state/equivalent jurisdiction
Sabah

% of total production/consumption volume

8.66

Please explain

In 2020 we traced 82% of our 2019 global business palm oil derivative purchases (e.g. priority suppliers providing more than 50MT of volume), achieving a 96.3% traceability to the origin refiner and a 97.3% traceability to the mill.

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Forest risk commodity

Palm oil

Country/Area of origin

Malaysia

State or equivalent jurisdiction

Specify state/equivalent jurisdiction

Johor

% of total production/consumption volume

6.99

Please explain

In 2020 we traced 82% of our 2019 global business palm oil derivative purchases (e.g. priority suppliers providing more than 50MT of volume), achieving a 96.3% traceability to the origin refiner and a 97.3% traceability to the mill.

Actual country and province volume data is not available at this level of detail.

Therefore, the percent of total production/consumption volume reported is based on the number of times mills in a given country and province appear in the sourcing data across our priority suppliers as traced by the Earthworm Foundation. The tracing was conducted across multiple tier levels (Tier 1 through Tier 5) and includes suppliers, first aggregator/origin refiner and the additional origin refiner allowing us to identify the region/province of the country where our palm derivatives are sourced.

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Forest risk commodity

Palm oil

Country/Area of origin

Malaysia

State or equivalent jurisdiction

Specify state/equivalent jurisdiction

Pahang

% of total production/consumption volume

6.35



Please explain

In 2020 we traced 82% of our 2019 global business palm oil derivative purchases (e.g. priority suppliers providing more than 50MT of volume), achieving a 96.3% traceability to the origin refiner and a 97.3% traceability to the mill.

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Forest risk commodity

Palm oil

Country/Area of origin

Malaysia

State or equivalent jurisdiction

Specify state/equivalent jurisdiction
Sarawak

% of total production/consumption volume

4.85

Please explain

In 2020 we traced 82% of our 2019 global business palm oil derivative purchases (e.g. priority suppliers providing more than 50MT of volume), achieving a 96.3% traceability to the origin refiner and a 97.3% traceability to the mill.

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Forest risk commodity

Palm oil

Country/Area of origin

Malaysia

State or equivalent jurisdiction

Specify state/equivalent jurisdiction
Perak

% of total production/consumption volume

4.23

Please explain

In 2020 we traced 82% of our 2019 global business palm oil derivative purchases (e.g. priority suppliers providing more than 50MT of volume), achieving a 96.3% traceability to the origin refiner and a 97.3% traceability to the mill.

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Forest risk commodity

Palm oil

Country/Area of origin

Malaysia

State or equivalent jurisdiction

Specify state/equivalent jurisdiction

4 provinces:

% of total production/consumption volume

1.8

Please explain

In 2020 we traced 82% of our 2019 global business palm oil derivative purchases (e.g. priority suppliers providing more than 50MT of volume), achieving a 96.3% traceability to the origin refiner and a 97.3% traceability to the mill.

We are reporting the remaining amount for Malaysia from the following 4 provinces:

Kelantan - 0.82%,

Kedah - 0.5%,

Melaka - 0.33%,

Pulau Pinang - 0.15%,

Actual country and province volume data is not available at this level of detail.

Therefore, the percent of total production/consumption volume reported is based on the number of times mills in a given country and province appear in the sourcing data across our priority suppliers as traced by the Earthworm Foundation. The tracing was conducted across multiple tier levels (Tier 1 through Tier 5) and includes suppliers, first aggregator/origin refiner and the additional origin refiner allowing us to identify the region/province of the country where our palm derivatives are sourced.

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Forest risk commodity

Palm oil

Country/Area of origin

Mexico

State or equivalent jurisdiction

Specify state/equivalent jurisdiction
Chiapas

% of total production/consumption volume

0.01

Please explain

In 2020 we traced 82% of our 2019 global business palm oil derivative purchases (e.g. priority suppliers providing more than 50MT of volume), achieving a 96.3% traceability to the origin refiner and a 97.3% traceability to the mill.

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Forest risk commodity

Palm oil

Country/Area of origin

Nigeria

State or equivalent jurisdiction

Specify state/equivalent jurisdiction
2 provinces Edo, Rivers,

% of total production/consumption volume

0.02

Please explain

In 2020 we traced 82% of our 2019 global business palm oil derivative purchases (e.g. priority suppliers providing more than 50MT of volume), achieving a 96.3% traceability to



the origin refiner and a 97.3% traceability to the mill.

We are reporting the total for Nigeria from two provinces:

Edo - 0.01%,

Rivers - 0.01%,

Actual country and province volume data is not available at this level of detail.

Therefore, the percent of total production/consumption volume reported is based on the number of times mills in a given country and province appear in the sourcing data across our priority suppliers as traced by the Earthworm Foundation. The tracing was conducted across multiple tier levels (Tier 1 through Tier 5) and includes suppliers, first aggregator/origin refiner and the additional origin refiner allowing us to identify the region/province of the country where our palm derivatives are sourced.

The company's sourcing of palm oil ingredients is limited to 99% derivatives of palm and palm kernel oil. Typically present in very small percentages as sub-components of surfactants, fatty alcohols, emulsifiers or fragrances, palm oil derivatives are used in some cleaning products, food flavorings and fragrances as well as some small volumes of natural personal care products.

A comprehensive risk assessment was performed in 2018, identifying High Impact Suppliers, and continues to be a useful tool to engage with our priority suppliers to bring visibility to their supply chains and support landscape level initiatives.

Forest risk commodity

Palm oil

Country/Area of origin

Panama

State or equivalent jurisdiction

Specify state/equivalent jurisdiction

Chiriqui

% of total production/consumption volume

0.01

Please explain

In 2020 we traced 82% of our 2019 global business palm oil derivative purchases (e.g. priority suppliers providing more than 50MT of volume), achieving a 96.3% traceability to the origin refiner and a 97.3% traceability to the mill.

Actual country and province volume data is not available at this level of detail.

Therefore, the percent of total production/consumption volume reported is based on the number of times mills in a given country and province appear in the sourcing data across our priority suppliers as traced by the Earthworm Foundation. The tracing was conducted across multiple tier levels (Tier 1 through Tier 5) and includes suppliers, first aggregator/origin refiner and the additional origin refiner allowing us to identify the

region/province of the country where our palm derivatives are sourced.

The company's sourcing of palm oil ingredients is limited to 99% derivatives of palm and palm kernel oil. Typically present in very small percentages as sub-components of surfactants, fatty alcohols, emulsifiers or fragrances, palm oil derivatives are used in some cleaning products, food flavorings and fragrances as well as some small volumes of natural personal care products.

A comprehensive risk assessment was performed in 2018, identifying High Impact Suppliers, and continues to be a useful tool to engage with our priority suppliers to bring visibility to their supply chains and support landscape level initiatives.

Forest risk commodity

Palm oil

Country/Area of origin

Papua New Guinea

State or equivalent jurisdiction

Specify state/equivalent jurisdiction

6 provinces: West New Britain, Oro, Guadalcanal, Milne Bay, Morobe, New Ireland,

% of total production/consumption volume

0.16

Please explain

In 2020 we traced 82% of our 2019 global business palm oil derivative purchases (e.g. priority suppliers providing more than 50MT of volume), achieving a 96.3% traceability to the origin refiner and a 97.3% traceability to the mill.

We are reporting the total for Papua New Guinea from 6 provinces:

West New Britain - 0.08%,

Oro - 0.03%,

Guadalcanal - 0.01%,

Milne Bay - 0.01%,

Morobe - 0.01%,

New Ireland - 0.01%,

Actual country and province volume data is not available at this level of detail.

Therefore, the percent of total production/consumption volume reported is based on the number of times mills in a given country and province appear in the sourcing data across our priority suppliers as traced by the Earthworm Foundation. The tracing was conducted across multiple tier levels (Tier 1 through Tier 5) and includes suppliers, first aggregator/origin refiner and the additional origin refiner allowing us to identify the region/province of the country where our palm derivatives are sourced.

The company's sourcing of palm oil ingredients is limited to 99% derivatives of palm and

palm kernel oil. Typically present in very small percentages as sub-components of surfactants, fatty alcohols, emulsifiers or fragrances, palm oil derivatives are used in some cleaning products, food flavorings and fragrances as well as some small volumes of natural personal care products.

A comprehensive risk assessment was performed in 2018, identifying High Impact Suppliers, and continues to be a useful tool to engage with our priority suppliers to bring visibility to their supply chains and support landscape level initiatives.

Forest risk commodity

Palm oil

Country/Area of origin

Thailand

State or equivalent jurisdiction

Specify state/equivalent jurisdiction

14 provinces: Surat Thani, Krabi, Chumphon, Trang, Nakhon Si Thammarat, Chon Buri, Pattani, Trat, Samut Sakhon, Kanchanaburi, Phang-Nga, Phatthalung, Prachuap Khiri Khan, Ranong,

% of total production/consumption volume

1.16

Please explain

In 2020 we traced 82% of our 2019 global business palm oil derivative purchases (e.g. priority suppliers providing more than 50MT of volume), achieving a 96.3% traceability to the origin refiner and a 97.3% traceability to the mill.

We are reporting the total for Thailand from 14 provinces:

- Surat Thani - 0.46%,
- Krabi - 0.34%,
- Chumphon - 0.08%,
- Trang - 0.08%,
- Nakhon Si Thammarat - 0.06%,
- Chon Buri - 0.03%,
- Pattani - 0.02%,
- Trat - 0.02%,
- Samut Sakhon - 0.02%,
- Kanchanaburi - 0.01%,
- Phang-Nga - 0.01%,
- Phatthalung - 0.01%,
- Prachuap Khiri Khan - 0.01%,
- Ranong - 0.01%,

Actual country and province volume data is not available at this level of detail.

Therefore, the percent of total production/consumption volume reported is based on the number of times mills in a given country and province appear in the sourcing data



across our priority suppliers as traced by the Earthworm Foundation. The tracing was conducted across multiple tier levels (Tier 1 through Tier 5) and includes suppliers, first aggregator/origin refiner and the additional origin refiner allowing us to identify the region/province of the country where our palm derivatives are sourced.

The company's sourcing of palm oil ingredients is limited to 99% derivatives of palm and palm kernel oil. Typically present in very small percentages as sub-components of surfactants, fatty alcohols, emulsifiers or fragrances, palm oil derivatives are used in some cleaning products, food flavorings and fragrances as well as some small volumes of natural personal care products.

A comprehensive risk assessment was performed in 2018, identifying High Impact Suppliers, and continues to be a useful tool to engage with our priority suppliers to bring visibility to their supply chains and support landscape level initiatives.

Forest risk commodity

Palm oil

Country/Area of origin

Any other countries/areas

State or equivalent jurisdiction

% of total production/consumption volume

0.06

Please explain

In 2020 we traced 82% of our 2019 global business palm oil derivative purchases (e.g. priority suppliers providing more than 50MT of volume), achieving a 96.3% traceability to the origin refiner and a 97.3% traceability to the mill.

We are reporting the total for all other countries not listed:

Costa Rica - Puntarenas - 0.04%,

Ghana - Eastern Region - 0.02%,

Actual country and province volume data is not available at this level of detail.

Therefore, the percent of total production/consumption volume reported is based on the number of times mills in a given country and province appear in the sourcing data across our priority suppliers as traced by the Earthworm Foundation. The tracing was conducted across multiple tier levels (Tier 1 through Tier 5) and includes suppliers, first aggregator/origin refiner and the additional origin refiner allowing us to identify the region/province of the country where our palm derivatives are sourced.

The company's sourcing of palm oil ingredients is limited to 99% derivatives of palm and palm kernel oil. Typically present in very small percentages as sub-components of surfactants, fatty alcohols, emulsifiers or fragrances, palm oil derivatives are used in some cleaning products, food flavorings and fragrances as well as some small volumes

of natural personal care products.

A comprehensive risk assessment was performed in 2018, identifying High Impact Suppliers, and continues to be a useful tool to engage with our priority suppliers to bring visibility to their supply chains and support landscape level initiatives.

Forest risk commodity

Palm oil

Country/Area of origin

Malaysia

State or equivalent jurisdiction

Specify state/equivalent jurisdiction
Negeri Sembilan

% of total production/consumption volume

1.57

Please explain

In 2020 we traced 82% of our 2019 global business palm oil derivative purchases (e.g. priority suppliers providing more than 50MT of volume), achieving a 96.3% traceability to the origin refiner and a 97.3% traceability to the mill.

Actual country and province volume data is not available at this level of detail. Therefore, the percent of total production/consumption volume reported is based on the number of times mills in a given country and province appear in the sourcing data across our priority suppliers as traced by the Earthworm Foundation. The tracing was conducted across multiple tier levels (Tier 1 through Tier 5) and includes suppliers, first aggregator/origin refiner and the additional origin refiner allowing us to identify the region/province of the country where our palm derivatives are sourced.

The company's sourcing of palm oil ingredients is limited to 99% derivatives of palm and palm kernel oil. Typically present in very small percentages as sub-components of surfactants, fatty alcohols, emulsifiers or fragrances, palm oil derivatives are used in some cleaning products, food flavorings and fragrances as well as some small volumes of natural personal care products.

A comprehensive risk assessment was performed in 2018, identifying High Impact Suppliers, and continues to be a useful tool to engage with our priority suppliers to bring visibility to their supply chains and support landscape level initiatives.

Forest risk commodity

Palm oil

Country/Area of origin

Malaysia

State or equivalent jurisdiction

Specify state/equivalent jurisdiction

Selangor

% of total production/consumption volume

1.43

Please explain

In 2020 we traced 82% of our 2019 global business palm oil derivative purchases (e.g. priority suppliers providing more than 50MT of volume), achieving a 96.3% traceability to the origin refiner and a 97.3% traceability to the mill.

Actual country and province volume data is not available at this level of detail. Therefore, the percent of total production/consumption volume reported is based on the number of times mills in a given country and province appear in the sourcing data across our priority suppliers as traced by the Earthworm Foundation. The tracing was conducted across multiple tier levels (Tier 1 through Tier 5) and includes suppliers, first aggregator/origin refiner and the additional origin refiner allowing us to identify the region/province of the country where our palm derivatives are sourced.

The company's sourcing of palm oil ingredients is limited to 99% derivatives of palm and palm kernel oil. Typically present in very small percentages as sub-components of surfactants, fatty alcohols, emulsifiers or fragrances, palm oil derivatives are used in some cleaning products, food flavorings and fragrances as well as some small volumes of natural personal care products.

A comprehensive risk assessment was performed in 2018, identifying High Impact Suppliers, and continues to be a useful tool to engage with our priority suppliers to bring visibility to their supply chains and support landscape level initiatives.

Forest risk commodity

Palm oil

Country/Area of origin

Malaysia

State or equivalent jurisdiction

Specify state/equivalent jurisdiction

Terengganu

% of total production/consumption volume

1.2

Please explain

In 2020 we traced 82% of our 2019 global business palm oil derivative purchases (e.g. priority suppliers providing more than 50MT of volume), achieving a 96.3% traceability to

the origin refiner and a 97.3% traceability to the mill.

Actual country and province volume data is not available at this level of detail. Therefore, the percent of total production/consumption volume reported is based on the number of times mills in a given country and province appear in the sourcing data across our priority suppliers as traced by the Earthworm Foundation. The tracing was conducted across multiple tier levels (Tier 1 through Tier 5) and includes suppliers, first aggregator/origin refiner and the additional origin refiner allowing us to identify the region/province of the country where our palm derivatives are sourced.

The company's sourcing of palm oil ingredients is limited to 99% derivatives of palm and palm kernel oil. Typically present in very small percentages as sub-components of surfactants, fatty alcohols, emulsifiers or fragrances, palm oil derivatives are used in some cleaning products, food flavorings and fragrances as well as some small volumes of natural personal care products.

A comprehensive risk assessment was performed in 2018, identifying High Impact Suppliers, and continues to be a useful tool to engage with our priority suppliers to bring visibility to their supply chains and support landscape level initiatives.

F1.5e

(F1.5e) How does your organization produce or consume biofuel derived from palm oil?

Does your organization produce or consume biofuel derived from palm oil?

No

Data type

Volume produced/consumed

Metric

Country/Area of origin

State or equivalent jurisdiction

% of total production/consumption volume

Does the source of your organization's biofuel material come from smallholders?

Comment

We do not produce or consume biofuel from palm oil

F1.6

(F1.6) Has your organization experienced any detrimental forests-related impacts?

No

F2. Procedures

F2.1

(F2.1) Does your organization undertake a forests-related risk assessment?

Yes, forests-related risks are assessed

F2.1a

(F2.1a) Select the options that best describe your procedures for identifying and assessing forests-related risks.

Timber products

Value chain stage

Direct operations
Supply chain

Coverage

Full

Risk assessment procedure

Assessed as part of an established enterprise risk management framework

Frequency of assessment

Annually

How far into the future are risks considered?

3 to 6 years

Tools and methods used

Internal company methods
Other, please specify
Sedex Radar Risk Tool, Risk Methods

Please explain

Clorox has a comprehensive enterprise risk management that includes identifying risks, assessing exposures and quantifying the value at risk to the company. Forests-related risks, such as deforestation, high carbon value forests also assessed by documenting

specific details from global fiber suppliers for packaging and wipes to understand their sourcing practices, supply chains, and certifications. The supply base for goods and services used in our products are continually monitored via web crawl technologies through a 3rd party monitoring service, where alerts are provided to company buyers and key contacts if any risk issues are uncovered, including those related to environmental or social non-compliance issues. Responsible Sourcing and Sustainability Program helps us assess our own upstream supply chain against social and environmental impacts by auditing and monitoring to verify compliance and minimize the opportunity for negative social and environmental impacts. We review all suppliers annually to assess inherent risk for third-party auditing. The extensive review includes spend, region and site location, health, safety & hygiene, business ethics, labor standards and environmental risks.

Global direct suppliers are assessed annually through our internal company method. We implemented into our annual review the use of the new Sedex Radar Tool. The Radar Tool evaluates risk at the country and site level with separate environmental indicators (biodiversity, energy & emissions, water, and waste and pollution). We use the tool to compare risks across countries, analyses risk in one country and explore subnational data identifying risk. In addition, the Sedex Radar Risk Tool is used to prescreen potential suppliers for risk, including biodiversity impact. The biodiversity impact is reviewed annually for all high risk global suppliers in our supply chain to determine if an audit is required each year and understand potential risks and action plans. The biodiversity indicator helps provide insight into forest related risks with the region of sourcing of suppliers.

In FY21, the Responsible Sourcing and Sustainability team partnered with the Global Quality Assurance Team (GQA). GQA was trained on SMETA 4 Pillar audits for non-compliances identified in our supply chain. These include a thorough review of environmental practices of our suppliers.

Palm oil

Value chain stage

Direct operations
Supply chain

Coverage

Full

Risk assessment procedure

Assessed as part of an established enterprise risk management framework

Frequency of assessment

Annually

How far into the future are risks considered?

> 6 years

Tools and methods used

Internal company methods
External consultants

Other, please specify

Risk Methods, Sedex Radar Risk Tool

Please explain

Clorox has a comprehensive enterprise risk management process that includes identifying risks, assessing exposures and quantifying the value at risk to the company. Palm-related risks are assessed by documenting details from global palm suppliers to understand their sourcing practices, supply chains, and certifications. Our procedures cover the full scope of direct operations value chain and partial supply value chain. The supply base for goods and services used in our products are monitored via web crawl technologies through a 3rd party service; alerts are provided to company buyers and key contacts if any risk issues are uncovered, including those related to environmental or social non-compliance issues. An internal palm grievance mechanism is being implemented in 2021, with a dedicated Clorox resource managing supplier compliance to help ensure no deforestation.

Our Responsible Sourcing and Sustainability Program helps us assess our upstream supply chain against social and environmental impacts by auditing and monitoring to verify compliance. We review all suppliers annually to assess risk for third-party auditing, including spend, region and site location, health, safety & hygiene, business ethics, labor standards and environmental risks. We ensure that our priority palm suppliers have a palm commitment that matches Clorox's NDPE commitment of no deforestation, no peatland destruction and no exploitation.

Through our work with the Earthworm Foundation, we are able to explore specific regions of palm sourcing through our sustainable sourcing program monitoring by getting input from their satellite monitoring system, Starling. These tools help to identify High Carbon Stock regions as well, which is another forest related risk that we assess. Top suppliers are assessed through our internal company method. Our review includes the Sedex Radar Tool. Starling has been incorporated into our palm risk review to evaluate risk in key sourcing regions and high impact supplier identification leading to a thorough risk assessment of our supply base in specific regions. Clorox joined the Areas of Priority Transformation Steering Committee, a multi-stakeholder group. By leveraging with other companies, we are able to stop the selling of palm oil to certain mills and move towards training of sustainable palm practices in Indonesia (where most of our palm is sourced).

F2.1b

(F2.1b) Which of the following issues are considered in your organization's forests-related risk assessment(s)?

Availability of forest risk commodities

Relevance & inclusion

Relevant, always included

Please explain

We evaluate availability of forest risk commodities on an ongoing basis through close collaboration with our suppliers. Through Market Intelligence sources and Supplier

Relationship Management practices, key suppliers are monitored and open communication is employed to understand all aspects of the market dynamics, including material availability, pricing, and emerging trends. Our risk management service uses web-crawl technology to monitor and alert in near real time all forest commodity locations and suppliers in our supply chain to ensure upsets or issues are quickly identified and appropriately addressed by the sourcing team. Buyers are routinely trained on Responsible Sourcing and Sustainability commitments, material standards are managed to ensure compliance, and suppliers are trained and engaged to ensure we meet our policy commitments. We routinely engage and survey the full supply base of fiber and palm ingredient suppliers to raise awareness, communicate our commitments, query them on practices, and solicit appropriate certifications (FSC, SFI, RSPO, etc.) for forest commodity materials provided to Clorox. This ensures compliance and helps us to identify any actions needed to close gaps in support of our commitments. Declaration Letters were requested for 2020 data resulting in suppliers providing a more detailed description of their sourcing practices and certifications. This new procedure has brought more transparency into our supply chain for fiber which includes primary and secondary packaging and substrates for our wipes. An example, in 2020 one of Kingsford's International customers requested that we provide certifications and wood sourcing details for our charcoal wood sourcing. The customer represented over \$20M of business and was considered a strategic partner to Clorox, identified by the business as at risk. Our Springfield plant reached out to their customers to confirm that the wood scrap provided to the plant was sourced from areas subject to the state's Forest Practice Act and FSC/SFI certification sources, which met the provisions of an international standard for responsible forestry. This supply chain mapping exercise not only saved the business, but showed that the recycled scrap supply chain at this plant was 80% certified. External training was conducted with this supplier along with internal training for our sales team.

Quality of forest risk commodities

Relevance & inclusion

Relevant, always included

Please explain

We constantly evaluate quality related issues, and all our raw material and contract manufacturing suppliers are evaluated, assessed, and audited as appropriate as part of our Supplier Quality Management (SQM) Program. The SQM process informs Supplier Selection, Supplier Approval, Supplier Integration, and Supplier Performance Management. Quality issues identified during onsite audits are captured in audit reports by the Clorox Quality Audit teams and corrective actions are implemented and tracked via formal Corrective and Preventative Actions (CAPA) reports.

Our Kingsford business is constantly assessing risks associated with the quality of the wood scrap that is used for making charcoal. Wood that is damp or wet, for example, can increase energy use during the char process and create quality issues. To address this issue, Kingsford's Summer Shade plant constructed a wood pile cover to reduce the amount of moisture from rainfall. The wood pile also allowed the site to stockpile less wood onsite and process it more efficiently. Another plant is in the process of constructing a new process that will cycle wood at a faster and more consistent rate,

reducing long term storage of wood and reducing the risk of degradation. These multi-million dollar investments are focused on improving the quality of the processed wood, reducing our energy use, and improving the quality of the final product, all of which are potential risks.

Impact of activity on the status of ecosystems and habitats

Relevance & inclusion

Relevant, always included

Please explain

In looking at the forest commodities in our supply chain, we've identified wood-based fiber use and sourcing for our packaging as an area where we can have an impact on reducing the pressure on natural forests. Our strategy leads with reducing the amount of fiber we use. Next, we strive to maximize recycled fiber to meet our needs. When virgin fiber is required, we seek sustainable forestry certifications to ensure responsible forestry practices have been followed. In addition, we recognize that responsibly sourcing of palm oil ingredients plays a key role in protecting human rights while conserving the environment including our forests. Clorox's palm ingredient volume represents less than 0.003 percent of palm oil produced globally each year. Given that our impact is relatively small on a global scale, we believe the most effective way to influence progress in the supply chain is through collaboration and partnership with suppliers, consumer packaged goods peers and nongovernmental organizations. We're working with our suppliers to ensure the palm oil and derivative ingredients in our products are from responsible sources.

In June 2019, we expanded our annual support for Priority Areas for Transformation (APT). APT is a program focused on land-use planning within the highly biodiverse d Ecosystem in Indonesia that allows members and participating stakeholders (communities, civil society, smallholders, industry and government) to work together to bring about sustainable economic growth while protecting a critical ecosystem.

The Sedex Radar Risk Tool is used to prescreen potential suppliers for risk and review biodiversity impact at supplier locations. The Sedex Risk Radar Tool's environmental risks cover indicators such as energy & emissions, biodiversity, water, and waste & pollution. We are committed to addressing these risks. For example, we are increasing the volume of Roundtable on Sustainable Palm Oil (RSPO) certified Palm in our supply chain. Sustainably sourced palm oil covers risks such as the environmentally (climate/habitat/water).

We work with Earthworm, who uses a satellite tool, Starling, which monitors specific areas of our sourcing regions for identifying key hot spots of deforestation which can be immediately acted upon with the Earthworm employees in these regions.

Regulation

Relevance & inclusion

Relevant, always included

Please explain

The changes in regulation of forest risk commodities exposure is monitored by our Responsible Sourcing and Legal teams. This is important information to ensure our global sourcing practices and strategies for our forest commodities are in compliance, and supplier selection criteria and supplier management are appropriate.

Several of our sustainable sourcing processes address risk associated with regulatory change. Audits, for example, assess fiber and palm supplier's compliance with the applicable regulations and flag those suppliers that might be a regulatory risk. Clorox requires are suppliers to adhere to our Business Partner Code of Conduct, which also addresses regulatory compliance. In 2021, Clorox developed a fiber questionnaire to be used for all fiber supplier requests for quotes. The questionnaire, along with a human rights questionnaire, is now included in our Salesforce Scout survey tool as a template for all buyers to ensure that they are complying with our BPCoC, including the applicable regulations.

We are committed to increasing the volume of RSPO certified Palm in our supply chain. Sustainably sourced palm oil production covers many aspects such as legal (e.g. regulations), economically viable (e.g. availability), environmentally appropriate and socially beneficial management and operations. In CY20 we increased the certification from 32% to 41% (global volume) from the previous year. In FY22 year we plan to implement process for all new and existing palm derivative ingredients to require RSPO certification, as the availability of certified sources in the supply chain increases.

Climate change

Relevance & inclusion

Relevant, always included

Please explain

Our risk assessments and plans to address them include climate. Our newly designated Sustainability Center closely monitors, tracks, and reports on our GHG commitments, including continued commitments for energy, GHG and water reductions and our Ignite Goals; 50% combined reduction in virgin plastic and fiber packaging by 2030, 100% recyclable, reusable or compostable packaging by 2025, science-based targets (SBT) to reduce GHG emissions, and 100% renewable electricity in the U.S. and Canada.

Our risks processes, including our Business Continuity Plans and Supply Chain Assurance programs consider climate related impacts to our timber and palm supply and identify options. Similarly, our Sustainable Sourcing teams have plans for responding to Climate related issues in our Timber and Palm supply. At a brand / asset level, risks and opportunities as related to climate change are identified taking into account the product portfolio, the unique characteristics and sourcing of each product and the location in which the ingredient is sourced and/or manufactured.

We use the Sedex Risk Radar Tool's to address Environmental risks, covering such indicators as energy & emissions, biodiversity, water, and waste & pollution.

Starling is used for palm through risk assessments throughout our supply chain. By reviewing the regions where we source, we can monitor real time deforestation and work with multi-stakeholders to stop bad actors in specific regions. In addition, we are helping the communities by educating them on sustainable practices protecting the environment and the people in those regions.

We are committed to increasing the volume of RSPO certified Palm in our supply chain.

Sustainably sourced palm oil production covers many aspects such as legal (e.g. regulations), economically viable (e.g. availability), environmentally appropriate (climate/habitat) and socially beneficial management and operations. In CY20 we increased the certification from 32% to 41% (global volume) from the previous year. In FY22 year we plan to implement process for all new and existing palm derivative ingredients to require RSPO certification, as the availability of certified sources in the supply chain increases.

Impact on water security

Relevance & inclusion

Relevant, always included

Please explain

We consider the impact of deforestation on water security in all the areas in which we operate and source from as reducing deforestation helps prevent floods and drought by regulating regional rainfall. Trees are important to the water cycle. They absorb rain fall and produce water vapor that is released into the atmosphere. Trees also reduce the amount of pollutants in water by stopping polluted water runoff. Studies show that in high risk areas of the Amazon, greater than 50% of the water in the ecosystem is held within its trees so preventing deforestation is crucial to the preservation of these eco-systems.

We use the Sedex Risk Radar Tool's to address Environmental risks, covering such indicators as energy & emissions, biodiversity, water, and waste & pollution. We are committed addressing these risk. For example we are increasing the volume of RSPO certified Palm in our supply chain. Sustainably sourced palm oil production covers aspects such as legal (e.g. regulations), economically viable (e.g. availability), environmentally appropriate (climate/habitat) and socially beneficial management and operations. In CY20 we increased the certification from 32% to 41% (global volume) from the previous year. In FY22 year we plan to implement process for all new and existing palm derivative ingredients to require RSPO certification, as the availability of certified sources in the supply chain increases.

Tariffs or price increases

Relevance & inclusion

Relevant, always included

Please explain

The risk of tariff or price increases is continually monitored by the Global Strategic Sourcing team as part of our Supplier Relationship Management program. This occurs through close collaboration with existing or potential suppliers, and responsible sourcing teams leveraging all market intelligence available to assess the risk and appropriate strategies for all key commodities, including forest risk commodities. Risks and potential mitigating actions are built into category/sourcing strategies shared with Sourcing management and Business Unit leadership to determine appropriate actions. In addition, the sourcing team continually monitors and is alerted by our active risk monitoring service of the potential for tariff or other factors that might be relevant to price impacts in our forest commodity supply chains. For ingredients containing palm

materials the Sourcing team assesses the availability and cost premiums associated with physically certified materials in our derivative supply chain to communicate operational impacts with current and future goals.

Loss of markets

Relevance & inclusion

Relevant, always included

Please explain

Clorox monitors and considers consumer feedback regarding key issues, including deforestation to inform market plans and for setting appropriate CR commitments/goals. As climate related risks and opportunities are an increasing part of how customers and consumers evaluate products, we evaluate the possible shifts in supply and demand for certain raw materials we purchase and also products that we manufacture. As we consider operational changes necessary to prevent increases in global temperature, we also consider the resilience and adaptability of our product portfolio to climate-related market trends and stakeholder expectations around business continuity preparedness. Market expectations around product sustainability influence our eco-goals and metrics. Clorox's has a business continuity plan (BCP) process that is designed to ensure that the company is able to respond effectively and recover quickly from a potential crisis or business disruption, including market disruptions. The BCP process includes identification of potential risks, strategies and plans to mitigate the impacts of those risks, and ongoing program management to enhance response capabilities or address new risks. The BCPs focuses on four areas; loss of site, loss of people, loss of business (e.g. market), and loss of a key vendor or a key suppliers, which covers both our upstream and direct operations value chains. Each is responsible for developing and maintaining operation specific BCPs using the enterprise wide tools and processes to respond to these risks including loss of business/market.

Leakage markets

Relevance & inclusion

Relevant, sometimes included

Please explain

We understand that leakage markets (e.g. areas that do not require sustainable palm) are a potential risk. Some of our work with the Earthworm Foundation, RSPO, APT, and collaboration with other CPGs is focused on identifying solutions on the ground in palm oil producing regions in our current supply chain. For example, our work with ATP to improve conditions in Indonesia and efforts to increase the number of existing markets that have RSPO certified palm, in part, to reduce the potential for enlarging leakage markets.

Brand damage related to forest risk commodities

Relevance & inclusion

Relevant, always included

Please explain

A major risk factor in determining appropriate CR actions and goals is minimizing potential for brand damage related to commodities in our supply chain, including any and all deforestation concerns. As such Clorox has implemented both public and internal commitments aimed at ensuring all our forest commodities are always sourced responsibly. This drives internal sourcing, tracking, and reporting actions; and external activity such as working with NGO partners like Earthworm - to better understand our palm supply chain so we can drive overall industry change, ensure our suppliers share our commitments, and immediately address issues with suppliers at any level in our supply chain. Clorox has a team comprised of persons around the organization that is able to respond quickly to address ESG risks, which could impact our brand image (includes representatives from Sustainable Sourcing, the Sustainability Center, the affected business, legal, and communications). This team has responded to forest related issues in order to minimize risk to our Brand image.

We are committed to increasing the volume of RSPO certified Palm in our supply chain. Sustainably sourced palm oil production covers aspects such as legal (e.g. regulations), economically viable (e.g. availability), environmentally appropriate and socially beneficial management and operations. In CY20 we increased the certification from 32% to 41% (global volume) from the previous year. In FY22 year we plan to implement process for all new and existing palm derivative ingredients to require RSPO certification, as the availability of certified sources in the supply chain increases. This work will help minimize the potential risk to our Brand image around forest related commodities.

Corruption

Relevance & inclusion

Relevant, always included

Please explain

The Clorox Company and its wholly owned subsidiaries worldwide have a strong commitment to responsible business practices. Operating honestly and ethically and treating people with dignity, respect and equal opportunity have been cornerstones of our company since it was founded in 1913. We expect our business partners' practices to reflect our own. We have a Business Partner Code of Conduct detailing business practice standards for our direct suppliers of goods, service providers, consultants, distributors, licensees, joint ventures, contractors and temporary workers.

Business partners must commit to the highest standards of ethical conduct and fair business practices. Business partners must Not Give or Accept Illegal Payments or Engage in Corruption: Business partners must not pay or offer to pay anything of value to any government official, including an officer, employee or consultant of a government or governmental department or agency, officer or employee of a state-owned enterprise or partially state-owned enterprise, political party or official, candidate for political office, officer or employee of a public international organization, or the spouse or immediate family members of any of the persons mentioned above, or any other person for the purpose of improperly influencing such person or obtaining or retaining business.

Business partners must fully comply with the U.S. Foreign Corrupt Practices Act, the UK Bribery Act and other applicable corruption laws. Business partners may also not accept or request such unlawful payments. Approximately 90% of spend globally is with

suppliers who are either contractually obligated or have self-certified acceptance of the Code, or have publicly shared corporate principals that align with the Clorox BPCoC. An internal Risk Assessment all direct material suppliers, including all forest risk commodities are conducted annually and third-party audits (SMETA 4-Pillar Audits preferred) are initiated for high-risk suppliers. This tool was formally implemented and well documented to ensure a thorough process was established to identify risks in our supply chain including forest related risks. Leadership and all timber buyers were trained on the importance of the Business Partner Code of Conduct and best practices for sourcing requirements to ensure no deforestation in our supply chain.

Social impacts

Relevance & inclusion

Relevant, always included

Please explain

Social Risks are assessed as part of our Enterprise Risk Management Program, through monitoring by our Global Strategic Sourcing (GSS) team and through our partnership with Earthworm Foundation. We evaluate our supply chain utilizing several tools to identify social issues and the actions needed to ensure responsible sourcing practices. Tools include our formal Responsible Sourcing Social Compliance Audit Risk Assessment, Sedex Radar Risk Tool and our internal Risk Methods (a web crawl technology) for reviewing risks in our supply chain. In addition, we are members of AIM Progress, NASPON, RSPO and actively participate with other CPG's. With these memberships, recognition of social compliance audits can be shared along with Ecovadis assessments of suppliers allowing for more insight into our supply chain. As part of our work with Earthworm, we are engaging with our primary suppliers of palm derivative ingredients to educate and collaborate on palm supply chain issues, including social issues.

Our commitment for palm oil ingredient sourcing addresses business ethics and human rights. Clorox has continued working with the Earthworm Foundation on-the-ground transformation. In June 2019, we renewed and expanded our annual support for Priority Areas for Transformation (APT) by joining the steering committee engaging with multi-stakeholders creating one voice of change for the regions.

In 2021, Clorox developed a fiber questionnaire to be used for all fiber supplier requests for quotes. The questionnaire, along with a human rights questionnaire, is now included in our Salesforce Scout survey tool as a template to ensure that suppliers are complying with our BPCoC. Clorox also has a team comprised of persons around the organization that respond quickly to address ESG risks, which include social impacts.

We are committed to increasing the volume of RSPO certified Palm in our supply chain. Sustainably sourced palm oil production covers aspects such as socially beneficial management and operations. As another example over the last 5 years, Clorox has supported Livelihood Programs in Indonesia (Ache Landscapes) with multi-stakeholder engagement improving households strengthening/diversifying livelihoods of forest-frontier communities, fostering local leadership/entrepreneurship of women/youth, and providing technical support for palm oil replanting in Indonesia.

Other, please specify

Relevance & inclusion

Please explain

F2.1c

(F2.1c) Which of the following stakeholders are considered in your organization's forests-related risk assessments?

Customers

Relevance & inclusion

Relevant, always included

Please explain

Customers are included in our forest related risk assessments and we work with our strategic customers on key issues related to deforestation. We collaborate with our customers on important sustainability initiatives. Collaborating with our customers on sustainability-related initiatives is important because their support is needed to meet our commitment to working with all parts of our supply chain to address deforestation. An example of this collaboration is our involvement with Walmart's Project Gigaton Initiative. Similarly, we are collaborating with Walmart, Ahold Delhaize, and Kroger on completing The Sustainability Index Survey (THESIS) each year. THESIS is designed to identify potential risks around ESG "hotspots" within specific product category sectors and create metrics to drive improvement. We also engage our suppliers on trial projects to address our forest-related risks. For example, we are working with one customer to pilot returnable containers designed to reduce the use of fiber in our tertiary packaging. Working with our customers to address forest-related risks has a positive impact on the supply chains of our forest-related commodities as well as positive brand and reputational benefits both for our company and our customers.

Employees

Relevance & inclusion

Relevant, always included

Please explain

We are committed to promoting sustainability across our company, including through employee engagement. We have a company-wide employee eco network, The Eco Warriors, with teams at our office and manufacturing sites, assist in increasing awareness on our company's eco-goals and commitments including our forest-related goals and commitments to improve the sustainability of our palm supply chain, ensure that 100% of our packaging fiber is from certified virgin or recycled sources, achieve 50% combined reduction in virgin plastic and fiber packaging by 2030, and achieve 100% recyclable, reusable or compostable packaging by 2025. As an example, Buyers are routinely trained on Responsible Sourcing and Sustainability commitments, material standards are managed to ensure compliance, and suppliers are

trained and engaged to ensure we meet our policy commitments and mitigate our risks. We routinely engage and survey the full supply base of fiber and palm ingredient suppliers to raise awareness, communicate our commitments, query them on practices, and solicit appropriate certifications (FSC, SFI, RSPO, etc.) for forest commodity materials provided to Clorox.

Site Eco-Warrior Teams also help educate employees on our Ignite goals and progress. Employees are encouraged submit their own ideas on how we can make sustainable product improvements and minimize our impacts, including those related to Forest issues. These ideas are reviewed by functional leadership across the organization for consideration and implementation. These ESG topics are also included in our company-wide quarterly town hall meetings. It is important to have Employee engagement to bring awareness throughout the company, to help meet our Ignite Goals and Palm and Timber related commitments, and as a resource to help identify new ideas or methods around our timber and forest related materials and products

Investors

Relevance & inclusion

Relevant, always included

Please explain

As our investors and stakeholders are increasingly concerned with responsible sourcing practices and the risks related to deforestation, we work to ensure that our deforestation commitments are robust. We review requests from investors and work to prioritize our commitments to ensure we address the areas of greatest concern to our investors, customers, NGO's and other stakeholders. Ensuring that investors are included in our risk assessment helps to protect our reputational risk as a company and the reputation of our brands.

It's important for us to consider investors in our risk assessments because we want to understand their concerns and address them. As part of this effort, we publicly disclose our CDP forest report so investors can see how we identify, manage and mitigate our forest-related risks.

Local communities

Relevance & inclusion

Relevant, always included

Please explain

The impact on local communities is an important part of our Forests risk assessment. One of our focus areas is our palm derivatives supply chain. Clorox has continued working with our implementation partner, Earthworm Foundation (formerly The Forest Trust) on traceability efforts, and on-the-ground transformation. In June 2019, we renewed and expanded our annual support for Priority Areas for Transformation (APT). APT is a program focused on land-use planning within the highly biodiverse Leuser Ecosystem in Indonesia that allows program members and other participating stakeholders— including local communities, civil society, smallholders, industry and government—to work together to bring about sustainable economic growth while protecting a critical ecosystem.

It's important that we address communities because they are often the ones that are impacted by our supply chain. We address these risks through community outreach programs. For example, Clorox has supported Livelihood Programs in Indonesia (Ache Landscapes) with multi-stakeholder engagement (previously known as the APT Palm Coalition) improving households strengthening/diversifying livelihoods of forest-frontier communities, fostering local leadership/entrepreneurship of women/youth, and providing technical support for palm oil replanting in Indonesia.

NGOs

Relevance & inclusion

Relevant, always included

Please explain

Including NGOs in our risk assessment helps us to address environmental and social risks as well as mitigate potential reputational and brand risk for the company. Our Corporate Sustainability Center, Corporate Risk Team and our Global Strategic Sourcing team stay abreast of NGO initiatives and focus areas to evaluate for relevance to our forest-related supply chain. We work directly with NGO's such as Earthworm Foundation on issues related to our supply chain to ensure that our sourcing strategy adequately addresses the environmental and social risks. We meet with the Earthworm Foundation regularly, we use them to assess our Palm supply chain, and we work with them to address risk related forest issues.

Other forest risk commodity users/producers at a local level

Relevance & inclusion

Relevant, always included

Please explain

Clorox has continued working with our implementation partner, Earthworm Foundation on traceability efforts, and on-the-ground transformation. It's important for us to include other commodity users/producers because they also have an impact on our supply chain at the local level, both positive and negative. We are working to engage them through programs like Priority Areas for Transformation (APT). In June 2019, we renewed and expanded our annual support for Priority Areas for Transformation (APT). APT is a program focused on land-use planning within the highly biodiverse Leuser Ecosystem in Indonesia that allows program members and other participating stakeholders— including local communities, civil society, smallholders, industry and government—to work together to bring about sustainable economic growth while protecting a critical ecosystem.

Regulators

Relevance & inclusion

Relevant, always included

Please explain



Both our Regulatory Affairs and Global Strategic sourcing team work to ensure that our risk assessment includes regulators. We consider regulations such as the Lacey Act for Timber and various other country specific regulations, specifically in high risk countries like Brazil. We ensure that our contracts and Business Partner Code of conduct references applicable forest related regulations.

Our Regulatory Affairs team engages with regulators through business groups or contracts with consulting firms regarding rules and regulations around to timber and palm. For example, Clorox provides input through industry consortiums around regulations designed to increase PCR in packaging.

Suppliers

Relevance & inclusion

Relevant, always included

Please explain

We engage with our key suppliers of forest commodities to ensure they are aware of our forest-related goals related to the sustainability and responsible sourcing of our palm supply chain and our timber-sourced packaging material. Information is shared through on-on-one supplier meetings and included as part of our supplier survey. We work directly with key suppliers of our palm derivative ingredients on specific traceability and other improvement projects through collaboration with Earthworm Foundation. This engagement includes working with key suppliers to analyze their palm related risk exposure based ownership and known plantation connections. Our engagement also includes working with our suppliers to develop multi-year improvement and action plans to address any potential risks or opportunities identified. We use the Sedex Radar tool to assess our supplier related risk and engage with Suppliers to mitigate risks identified by the tool. Supplier engagement and support is critical toward addressing our palm and forest related goals and commitments as well as our risks, and thus we include Suppliers in our risk assessments.

In 2021, we modified our engagement practices to include two supplier engagement sessions (twice per year) to ensure the suppliers are educated on our responsible sourcing requirements and to ensure full compliance with all in scope suppliers. In addition to supporting our suppliers, we have partnered with our international sales team to bring better visibility to understanding our supply chain.

Other stakeholders, please specify

Relevance & inclusion

Please explain

F3. Risks and opportunities

F3.1

(F3.1) Have you identified any inherent forests-related risks with the potential to have a substantive financial or strategic impact on your business?

	Risk identified?
Timber products	Yes
Palm oil	Yes

F3.1a

(F3.1a) How does your organization define substantive financial or strategic impact on your business?

Clorox has enterprise risk management (ERM) processes to identify, assess and prioritize business risks. Clorox uses a systematic process to evaluate risks. The process includes identifying risks, assessing exposures and quantifying the value at risk to the company. The evaluation considers level of potential impact, the overall vulnerability to an event based on the time and our capacity to react and adapt, and the likelihood of an occurrence. Clorox's Enterprise Risk Management Program evaluates risks associated with the Company based on a number of criteria, which include but are not limited to quantitative definitions such as cumulative impact to pre-tax earnings and shareholder impact from a share price/market capitalization volatility standpoint and other qualitative definitions such as reputation/brand equity, customer and consumer impact. For each of these criteria, Clorox's ERM program has established a 5 point scale from very low to very high and risks are evaluated across all the criteria/definitions. A substantive risk is one where the impact is medium to high across a number of criteria and has a high likelihood to disrupt our ability to operate our business. From an ERM perspective, we do not believe that forest-risk commodities pose a substantive risk to our business. We believe our dispersed supply chain affords us redundancy, which mitigates risk to our business from localized events. However, we do believe forest risk commodities pose a strategic risk to our company, its values and its commitment to corporate responsibility. We believe our short and long-term success lies in our focus on driving good-growth, growth that is not just profitable and sustainable, but also achieved responsibly. Strategically, we committed to having sustainably sourced or recycled content in the packaging we purchase. Our IGNITE Strategy integrates our business strategy with our ESG goals such as reducing the volume of virgin fiber in our packaging by 2030 and having all packaging be reusable, recyclable, or compostable by 2025. At Clorox, addressing deforestation and its impact on climate change is an important aspect of conducting business responsibly

F3.1b

(F3.1b) For your disclosed forest risk commodity(ies), provide details of risks identified with the potential to have a substantive financial or strategic impact on your business, and your response to those risks.

Forest risk commodity

Timber products

Type of risk

Reputational and markets

Geographical scale

Global

Where in your value chain does the risk driver occur?

Supply chain

Primary risk driver

Increased stakeholder concern or negative stakeholder feedback

Primary potential impact

Reduced demand for products and services

Company-specific description

Currently almost 99% of all fiber-based packaging we source (cartons, corrugates, displays and bags) to be made with either recycled or certified virgin fiber as verified by our annual fiber survey/supplier declaration letters. Our Glad products achieved 99% recyclable packaging in CY20 along with a 48% reduction in virgin packaging, achieved by increased recycled fiber content. In 2019 we established a new goal for a 50% combined reduction in virgin plastic and fiber packaging by 2030.

If there is an increased demand for certified sustainable fiber, recycled fiber, or if certified sustainable fiber is not as readily available in certain regions, there is a risk that we may not be able to meet our goal and that we would have to increase our use of uncertified virgin fiber to meet our production needs. Should there be an issue related to our uncertified virgin fiber volume (rather it remains the same or increases due to decreased availability) related to sourcing, regulatory compliance or other issues that might pose a reputational risk with our stakeholders such as customers and consumers, there is the potential for reduced demand for our goods and services.

Timeframe

>6 years

Magnitude of potential impact

Low

Likelihood

Very unlikely

Are you able to provide a potential financial impact figure?

Yes, an estimated range

Potential financial impact (currency)

Potential financial impact figure - minimum (currency)

700,000

Potential financial impact figure - maximum (currency)

3,500,000

Explanation of financial

Our Timber supply chain is mature and the availability of certified virgin material is not an area of high risk or concern at this time. Should availability become an issue, brand reputation could be negatively impacted if there is shortage of certified virgin material. Negative publicity related to issues with our timber supply chain could translate to decreased demand for our products with a resulting decrease in sales. The potential estimated decrease in sales could be in the range of 0.01% to 0.05% of company sales CY20 or \$700,000 to \$3, 500,000 dollars.

Primary response to risk

Engagement with suppliers

Description of response

Currently almost 99% of all fiber-based packaging we source is made with either recycled or certified virgin fiber, as verified by our annual fiber survey declaration letters. In 2019 we established a new goal for a 50% combined reduction in virgin plastic and fiber packaging by 2030. If there is an increased demand for certified sustainable fiber or if certified sustainable fiber is not available in certain regions, we have a risk that we may not be able to meet our goal and there is a negative impact to our brand and reputation as a result our timber supply chain risks.

We engage with suppliers to understand availability and cost implications of certified virgin fiber for our packaging as well as the future outlook of the timber markets in the regions in which we operate and source from.

We assess the risk and approach to managing risk in the supply chains of the timber-based materials in our Wipes business and mill wood residuals and by-products in our Kingsford business. This includes but is not limited to ensuring the timber materials used in our wipes and charcoal products are from certified sources or sourced from geographic regions where deforestation risk is low. In addition we monitor our supply base for goods and services that are used in our products via web crawl technologies via a 3rd party service, which alerts buyers and key business contacts if any compliance risk issues are reported among our direct suppliers. This would allow for swift actions if needed.

Cost of response

0

Explanation of cost of response

Costs associated with supplier engagement are included in our standard Supplier Relationship Management (SRM) program practiced by our Global Strategic Sourcing team. This ensures awareness of market dynamics and changes that could potentially impact our ability to deliver on our forest commodity commitments. Any response to issues, or necessary changes in supply chain source, are anticipated to be within the scope of responsibilities of existing commodity sourcing managers. As there are no



additional costs, the cost of response is \$0 dollars.

This response may contain “forward-looking” statements based on management’s current views, beliefs, assumptions and expectations regarding future events and speak only as of the date of this submittal. The company undertakes no obligation to publicly update or revise any “forward-looking” statements, whether as a result of new information, future events or otherwise, except as required by the federal securities laws.

Forest risk commodity

Palm oil

Type of risk

Reputational and markets

Geographical scale

Global

Where in your value chain does the risk driver occur?

Supply chain

Primary risk driver

Availability of certified sustainable material

Primary potential impact

Increased operating costs

Company-specific description

We have established commitments that all our palm oil ingredients responsibly sourced. In support of this goal, Clorox is a member of the Roundtable on Sustainable Palm Oil (RSPO) and continues to develop appropriate plans of action in accordance with the framework of the RSPO process, to promote the RSPO and sustainable palm oil production, procurement and consumption. Directly sourcing only derivative palm ingredients adds complexity and cost to the objective of sourcing only RSPO certified materials. We continue to work with our existing suppliers and engage new suppliers in an effort to bring availability of competitively priced certified palm ingredients to market. We recognize there is a risk that we may have to pay a premium for palm oil ingredients that meet our requirements. This has the potential to directly impact our operations and our suppliers through increased costs of materials as well as increased indirect costs through additional resource needs to track and assess progress against this goal. There is also a risk to the business that use palm oil derivatives that sufficient volumes of RSPO certified products may not be available for planned production

Timeframe

1-3 years

Magnitude of potential impact

Low

Likelihood

More likely than not

Are you able to provide a potential financial impact figure?

Yes, an estimated range

Potential financial impact (currency)

Potential financial impact figure - minimum (currency)

2,000,000

Potential financial impact figure - maximum (currency)

2,500,000

Explanation of financial

The cost impact related to directly sourcing only certified RSPO palm oil has been estimated to be in the range of \$2 Million to \$2.5 Million USD. We expect this cost to decrease in time as the availability of Certified Sustainable Palm Oil (CSPO) becomes more widely available in accordance with the RSPO mission to transform markets to make sustainable palm oil the norm

Primary response to risk

Engagement with suppliers

Description of response

We continue to work with our existing suppliers and engage new suppliers in an effort to bring availability of competitively priced certified palm ingredients to market. We recognize there is a risk that we may have to pay a premium for palm oil ingredients that meet our requirements

Cost of response

250,000

Explanation of cost of response

Costs for NGO and other organizational memberships and support, along with potential new supplier engagements and new material validations are estimated as part of the response associated with this risk.

This response may contain “forward-looking” statements based on management's current views, beliefs, assumptions and expectations regarding future events and speak only as of the date of this submittal. The company undertakes no obligation to publicly update or revise any “forward-looking” statements, whether as a result of new information, future events or otherwise, except as required by the federal securities laws.

F3.2

(F3.2) Have you identified any forests-related opportunities with the potential to have a substantive financial or strategic impact on your business?

	Have you identified opportunities?
Timber products	Yes
Palm oil	Yes

F3.2a

(F3.2a) For your selected forest risk commodity(ies), provide details of the identified opportunities with the potential to have a substantive financial or strategic impact on your business.

Forest risk commodity

Timber products

Type of opportunity

Markets

Where in your value chain does the opportunity occur?

Supply chain

Primary forests-related opportunity

Increased demand for certified materials

Company-specific description & strategy to realize opportunity

Currently almost 99% of all fiber-based packaging we source (cartons, corrugates, displays and bags) to be made with either recycled or certified virgin fiber as verified by our annual fiber survey/supplier declaration letters. In 2019 we established a new goal for a 50% combined reduction in virgin plastic and fiber packaging by 2030. These goals are global in nature, and the main opportunity we would derive is increased collaboration with our supply chain partners and driving demand for increasing capacity in sustainable timber commodities.

Our strategy to achieve and maintain these goals is to collaborate with our supply chain partners and raw material suppliers. We report our status and progress as part of our CR communication strategy.

Estimated timeframe for realization

1-3 years

Magnitude of potential impact

Low

Likelihood

More likely than not

Are you able to provide a potential financial impact figure?

Yes, a single figure estimate

Potential financial impact figure (currency)

0

Potential financial impact figure – minimum (currency)

Potential financial impact figure – maximum (currency)

Explanation of financial impact figure

No financial impact is anticipated since this opportunity is part of our overall strategy for ensuring we achieve our goal of having only sustainably sourced, certified virgin or recyclable fiber in our packaging. We currently engage our suppliers to ensure the fiber we purchase meets our requirements. We have assigned a value of \$0 dollars for potential financial impact, understanding that the certification may increase our procurement costs by 2-4%.

Forest risk commodity

Palm oil

Type of opportunity

Markets

Where in your value chain does the opportunity occur?

Supply chain

Primary forests-related opportunity

Increased availability of products with reduced environmental impact (other than certified products)

Company-specific description & strategy to realize opportunity

The main opportunity we would derive is increased collaboration with our supply chain partners, increasing transparency and driving demand for increasing capacity in sustainable palm oil commodities. Our approach to identify key points in the supply chain where we can influence change and support transformation activities on the ground is working. Through our mapping work with our direct suppliers, we annually meet with our priority suppliers to communicate our sourcing commitments upstream and ensure that our requirements are understood by stakeholders able to influence change on the ground. We also inform all palm suppliers each year of palm commitments. We have made great progress ensuring that our priority suppliers understand our commitment and assist them with creating a policy or commitment if they do not have a public commitment. In June 2019, we renewed and expanded our annual support for Priority Areas for Transformation (APT). APT is a program focused on land-use planning within the highly biodiverse Leuser Ecosystem in Indonesia that allows program members and other participating stakeholders— including local communities, civil society, smallholders, industry and government—to work together to bring about sustainable economic growth while protecting a critical ecosystem. We selected this area as 71% of our palm oil is sourced from Indonesia. In addition, we have joined the APT Steering Committee demonstrating leadership and

direction on investment opportunities based on risk. We invest in programs to enhance the well-being of communities in our supply chain. We continued to support the Earthworm Foundation's Aceh Landscape Program, which advances long-term, landscape-level sustainability transformation in the Indonesian region of Aceh, Sumatra. Through the program, we supported multi-stakeholder engagement projects which improved and diversified the livelihoods of more than 2,000 households in forest-frontier communities and strengthened local leadership and entrepreneurship of women and youth.

Estimated timeframe for realization

1-3 years

Magnitude of potential impact

Low

Likelihood

More likely than not

Are you able to provide a potential financial impact figure?

Yes, an estimated range

Potential financial impact figure (currency)

Potential financial impact figure – minimum (currency)

2,000,000

Potential financial impact figure – maximum (currency)

2,500,000

Explanation of financial impact figure

Based on our current estimated cost premiums to procure 100% certified palm ingredients, the financial impact would translate to a savings of \$2 Million to \$2.5 Million dollars by eliminating premiums for certified ingredients under an open market scenario.

Forest risk commodity

Palm oil

Type of opportunity

Products & services

Where in your value chain does the opportunity occur?

Supply chain

Primary forests-related opportunity

Increased supply chain transparency

Company-specific description & strategy to realize opportunity



We have a goal that all our palm / palm kernel oil ingredients are traceable and responsibly sourced. We are partnering with Earthworm/The Forest Trust (TFT) and our current suppliers of palm oil ingredients on a plan to help ensure that the ingredients used in our products meet our comprehensive responsible sourcing commitments, including criteria around traceability, deforestation, peatland preservation and high-carbon stock forest conservation, and business ethics and human rights. These goals are global in nature, and the main opportunity we would derive is increased collaboration with our supply chain partners, increasing transparency and driving demand for increasing capacity in sustainable palm oil commodities.

Our strategy to achieve these goals is to partner with TFT and collaborate with our supply chain partners and raw material suppliers to ensure we meet these goals. We plan to report our progress as part of our CR communication strategy.

Our approach is to identify key points in the supply chain where we can influence change and support transformation activities on the ground. Through our mapping work with our direct suppliers, we will be able to communicate our sourcing commitments upstream and ensure that our requirements are understood by stakeholders able to influence change on the ground. Given Clorox’s place downstream in the supply chain, we will be most directly linked to the first importers. We will work closely with them to understand how they are driving change with their direct suppliers in the countries of palm oil production (usually origin refineries).

Estimated timeframe for realization

4-6 years

Magnitude of potential impact

Low

Likelihood

More likely than not

Are you able to provide a potential financial impact figure?

No, we do not have this figure

Potential financial impact figure (currency)

Potential financial impact figure – minimum (currency)

Potential financial impact figure – maximum (currency)

Explanation of financial impact figure

We did not estimate the financial impact for this opportunity.

Forest risk commodity

Palm oil

Type of opportunity

Products & services

Where in your value chain does the opportunity occur?

Supply chain

Primary forests-related opportunity

Increased supply chain transparency

Company-specific description & strategy to realize opportunity

Clorox has a plan to source all of our palm oil sustainably. Clorox is a member of the Roundtable on Sustainable Palm Oil (RSPO) and supports RSPO standards and certification as a means to drive sustainable palm oil. We also seek to ensure that our use of palm derived ingredients do not contribute to deforestation, peat clearance and human rights abuses. Our commitments include:

- Source CSPO for palm oil and its derivatives through RSPO physical supply chains by 2025,
- Ensure suppliers sourcing palm oil and palm kernel oil in our supply chain have public sustainable palm oil commitments aligned with the RSPO Principles and Criteria, including what is commonly referred to as NDPE (No Deforestation, No Peat and No Exploitation):
- Continue to hold suppliers accountable to the principles outlined in our Business Partner Code of Conduct, including compliance with all applicable laws and regulations in the countries of operation, and respect for human rights throughout the value chain.
- Continue mapping, tracing and/or monitoring the supply chain of our palm ingredient suppliers and ensure adherence to Clorox and their own sourcing commitments and practices.
- Continue engaging with our suppliers, industry peers, shareholders, non-governmental organizations and other stakeholders to promote sustainable palm oil supply chains, including collaborations to strengthen certification and verification mechanisms.
- Report annually on our progress against these commitments.

These commitments apply to all palm oil ingredients we purchase globally. Our ability to achieve these commitments depends heavily on the changing practices of the palm industry and the future market availability of the palm derivatives used in our products. Our strategy to achieve these goals is to partner with Earthworm Foundation and collaborate with our supply chain partners and raw material suppliers. We plan to report our progress as part of our CR communication strategy.

Our approach is to identify key points in the supply chain where we can influence change and support transformation activities on the ground. Through our mapping work with our direct suppliers, we will be able to communicate our sourcing commitments upstream and ensure that our requirements are understood by stakeholders able to influence change on the ground.

Estimated timeframe for realization

4-6 years

Magnitude of potential impact

Low



Likelihood

More likely than not

Are you able to provide a potential financial impact figure?

Yes, a single figure estimate

Potential financial impact figure (currency)

125,000

Potential financial impact figure – minimum (currency)

Potential financial impact figure – maximum (currency)

Explanation of financial impact figure

The financial impact of \$125,000 includes the current yearly cost to Clorox for traceability work with our suppliers and industry partners.

F4. Governance

F4.1

(F4.1) Is there board-level oversight of forests-related issues within your organization?

Yes

F4.1a

(F4.1a) Identify the position(s) of the individual(s) (do not include any names) on the board with responsibility for forests-related issues.

Position of individual	Please explain
Board-level committee	The Board of Directors Nominating, Governance and Corporate Responsibility Committee (NGCRC), comprised exclusively of independent directors, oversees Clorox’s corporate responsibility and sustainability program, including all climate related issues. The committee oversees the Company’s environmental, social and governance (ESG) process and approach and regularly discuss with management the strategy related to environmental goals, risks and opportunities. This committee is therefore directly responsible for overseeing the company's climate and environmental related strategy and risks. This includes overseeing the company's climate related goals and progress. The NGCRC receives updates on ESG issues of relevance to our stakeholders, which often includes information related to climate risks, oversight and disclosure. The full Board participates in regular (at least annual) updates on ESG topics, including climate, and, as part of its enterprise risk management (ERM) oversight role.

F4.1b

(F4.1b) Provide further details on the board’s oversight of forests-related issues.

	Frequency that forests-related issues are a scheduled agenda item	Governance mechanisms into which forests-related issues are integrated	Please explain
Row 1	Scheduled - some meetings	<p>Monitoring implementation and performance</p> <p>Reviewing and guiding corporate responsibility strategy</p> <p>Reviewing and guiding risk management policies</p> <p>Reviewing and guiding strategy</p>	<p>The highest level of responsibility for climate change rests with the Board of Directors Nominating, Governance and Corporate Responsibility Committee, which oversees Clorox’s environmental matters and compliance and is updated at least quarterly on ESG- related priorities, including, as appropriate, those related to forest such as a 50% combined reduction in virgin plastic and fiber packaging and 100% recyclable, reusable, or compostable packaging.</p> <p>The Executive Committee, made up of the company’s most senior leaders, including the CEO, is responsible for overseeing the execution of our business strategy, driving ESG priorities including forest related issues. Clorox is committed to strong governance, working to tie elements of ESG goals to executive compensation awards. Key ESG roles on the Executive Committee include the three ESG Executives: Senior Vice President – Chief Legal Counsel, who oversees governance matters, the Executive Vice President - Chief Growth Officer, to whom the Vice President, Chief Sustainability Officer reports, and who oversees all environmental sustainability matters, and the Executive Vice President – Chief People & Corporate Affairs Officer who oversees social matters and strategy. These executives are responsible for ESG related priorities, including our Forest related Goals, our Forest related policies or commitments, and any related impacts or opportunities.</p>

F4.2

(F4.2) Provide the highest management-level position(s) or committee(s) with responsibility for forests-related issues (do not include the names of individuals).

Name of the position(s)	Responsibility	Frequency of reporting to	Please explain
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and/or committee(s)		the board on forests-related issues	
Chief Executive Officer (CEO)	Both assessing and managing forests-related risks and opportunities	Quarterly	<p>The CEO, who is on the Board, is responsible for the company’s overall ESG strategy, which includes our climate strategy.</p> <p>The CEO is directly responsible for approving the company’s strategic Ignite Goals, including, for example, Forest related goals such as a 50% combined reduction in virgin plastic and fiber packaging and 100% recyclable, reusable, or compostable packaging. The CEO is tasked with ensuring that the company is actively making progress toward our climate related goals and has responsibility for meeting them. The CEO is also tasked with ensuring that there is a team in place, led by the ESG Executive Team (described above) who report to the CEO, to execute the company’s climate goals, ensuring that the goals are appropriately set, monitored and tracked and progress is being made. The CEO is provided quarterly updates on our forest related goals.</p>
Other, please specify Executive Vice President – General Counsel and Corporate Affairs	Both assessing and managing forests-related risks and opportunities	Quarterly	<p>The company’s ESG Executive Team, comprised of Clorox’s EVP, Chief Growth Officer, EVP, Chief People and Corporate Affairs Officer and SVP, Chief Legal Officer – each reporting to Clorox’s CEO – is responsible for overseeing the execution of our ESG priorities and ensuring our business strategy considers and optimizes our ESG priorities, including our Climate goals. The ESG Executive Team is responsible for helping to develop and make recommended climate ambitions to the CEO and oversee and assess progress on the climate goals.</p> <p>The ESG Executive committee receives a quarterly update that details progress on our forest related goals and identifies forest related issues. For example, the Responsible Sourcing and Sustainability team reports progress on our fiber and</p>



			<p>palm initiatives, such as increasing the percentage of RSPO certified palm ingredients. The quarterly ESG update also provides visibility and governance of our timber related commodities as well as progress toward our forest related ESG Goals, such as having 100% recyclable, reusable, or compostable packaging and reductions in our virgin fiber and plastic packaging. Ultimately, the ESG Executive Committee is responsible for execution of the forest related goals and is tasked with taking action if there are issues that need to be addressed (e.g. tasking GSS to identify additional sources of PCR content).</p>
Risk committee	Assessing forests-related risks and opportunities	Annually	<p>Clorox's Enterprise Risk Management (ERM) Steering Team, is comprised of members of Clorox's senior management and chaired by our VP of Global Risk Management with executive oversight from the CFO and Chief Legal Officer. The ERM Committee has specifically identified Climate Risk as one of Clorox's top enterprise risks and ESG risks generally. Integral to our identification and mitigation of climate risks are identifying and managing risks associated with deforestation and water stress. The ERM team has responsibilities related to monitoring risks and opportunities related to climate issues. Clorox has a comprehensive enterprise risk management process to identify, assess and prioritize business risks. The process includes identifying potential risks, assessing exposures and quantifying the value at risk to the company. The evaluation considers level of potential impact, the overall vulnerability to an event based on the time and the capacity to react and adapt, and the likelihood of an occurrence. The ERM office reports directly to the company's Board of Directors and provides the Board key ERM updates, including reporting on ESG, at least annually. Their scope</p>

			includes climate related risks including forest and opportunities across our operations and value chain
Chief Sustainability Officer (CSO)	Both assessing and managing forests-related risks and opportunities	Not reported to board	The VP, Chief Sustainability Officer leads our Sustainability Center, with executive oversight by the EVP, Chief Growth Officer, who is a member of the company's ESG Executive Committee and reports to Clorox's CEO. Environmental priorities are overseen by our Chief Sustainability Officer, who leads our Sustainability Center and is responsible for making environmental sustainability-related recommendations to Clorox's Senior Leadership. The Sustainability Center is responsible for defining, driving and tracking progress against Clorox's sustainability strategy, assessing the progress, and presenting it to the Senior Leadership.
Sustainability committee	Both assessing and managing forests-related risks and opportunities	Not reported to board	The Sustainability Center is responsible for defining, driving and tracking progress against Clorox's sustainability strategy, assessing the progress, and presenting it to the Senior Leadership. This team serves as an enabling organization, building capability and supporting business units and functions in delivering both corporate planet goals, and business unit sustainability goals. This includes developing and recommending Climate related strategies to the organization, working closely with the various functions and businesses within Clorox to integrate climate considerations into their processes and decision-making, and measuring and reporting our climate-related footprint and progress against goals and metrics to the company and external stakeholders. The Sustainability Center's leadership team includes Vice Presidents and Senior Directors responsible for sustainability commercialization, technology, operations and supply chain, and strategy and performance, with each role supported by teams connected into the core functions.

			Members of the Sustainability Center provide quarterly updates
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F4.3

(F4.3) Do you provide incentives to C-suite employees or board members for the management of forests-related issues?

	Provide incentives for management of forests-related issues	Comment
Row 1	No, and we do not plan to introduce them in the next two years	In 2019, Clorox announced Integrated Environmental Sustainability, and Governance (ESG) Goals, called IGNITE Goals. These goals include “Enhance our leadership in ESG through an unwavering commitment to strong corporate governance and ESG performance overseen by the board of directors.” This goal is supported by establishing executive compensation awards that are tied to elements of our ESG goals for members of the Clorox executive committee, including for the chair and CEO. While none of the IGNITE Goals are explicitly tied to forests, the Board Members do ensure that the company is addressing any forest related issues as part of its climate and broader ESG strategy, including monitoring and addressing any significant forest risks, as part of their overall responsibilities.

F4.4

(F4.4) Did your organization include information about its response to forests-related risks in its most recent mainstream financial report?

Yes (you may attach the report – this is optional)

F4.5

(F4.5) Does your organization have a policy that includes forests-related issues?

Yes, we have a documented forests policy that is publicly available

F4.5a

(F4.5a) Select the options to describe the scope and content of your policy.

	Scope	Content	Please explain
Row 1	Company-wide	Commitment to eliminate deforestation Commitment to no deforestation, to no planting on peatlands	We recognize the impact deforestation has on climate change, reduced biodiversity, and water scarcity and have set public goals against prioritized commodities in our supply chain that we have determined have greater potential for deforestation risk. Specifically, goals to source only recycled or certified virgin fiber for packaging and to ensure that all our palm/palm kernel



		<p>and to no exploitation (NDPE)</p> <p>Commitment to protect rights and livelihoods of local communities</p> <p>Commitments beyond regulatory compliance</p> <p>Commitment to transparency</p> <p>Commitment to stakeholder awareness and engagement</p> <p>Recognition of the overall importance of forests and other natural ecosystems</p> <p>Description of business dependency on forests</p> <p>Recognition of potential business impact on forests and other natural habitats</p> <p>Description of forest risk commodities, parts of the business, and stages of value-chain covered by the policy</p> <p>List of timebound milestones and targets</p> <p>Description of forests-related performance standards for direct operations</p> <p>Description of forests-related standards for procurement</p>	<p>oil derivative ingredients are responsibly sourced, including around traceability, deforestation, peatland preservation and high-carbon stock forest conservation, and business ethics and human rights, achieve 50% combined reduction in virgin plastic and fiber packaging, and achieve 100% recyclable, reusable or compostable packaging. We monitor key commodities for deforestation risk, including pulp and cellulose fiber in our wipes products, mill wood residuals and by-products, as well as wood char in our charcoal, to determine if they are from certified sources or grown in areas with low deforestation risk.</p> <p>Our General Sustainable Sourcing Standards requires that sources must:</p> <ol style="list-style-type: none"> (1) Comply with environmental, health & safety, labor and social laws and regulations (2) Avoid deforestation of primary and secondary forests with significant ecological value. This includes “High Carbon Stock” forests and peat lands. (3) Protect biodiversity (4) Provide transparency of sources back to the primary production level (5) Avoid minerals that have been extracted in support of armed conflict <p>This standard applies to raw materials of agricultural or mining origins used in products and product packaging that are produced by or on behalf of Clorox, including but not limited to palm oil, timber, pulp and paper. We are committed to transparency through reporting to ACOP and CDP Forest. Our time-bound milestones and targets are presented on The Clorox Company website. We require our suppliers to abide by the Clorox Responsible and Sustainable Sourcing Policy, the Clorox Business Partner Code of Conduct (BPCOC), the Clorox Human Rights Policy, the Clorox Environmental Policy and the Clorox Freedom of Association Policy. We also require our suppliers to share our Policy, its associated standards, and our BPCoC with their upstream suppliers.</p> <p>In situations where laws applicable to our suppliers are more stringent than our policies and standards, our suppliers must follow the applicable laws.</p>
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F4.5b

(F4.5b) Do you have commodity specific sustainability policy(ies)? If yes, select the options that best describe their scope and content.



	Do you have a commodity specific sustainability policy?	Scope	Content	Please explain
Timber products	Yes	Company-wide	<p>Commitments beyond regulatory compliance</p> <p>Commitment to stakeholder awareness and engagement</p> <p>Recognition of the overall importance of forests and other natural ecosystems</p> <p>Description of business dependency on forests</p> <p>Description of forest risk commodities, parts of the business, and stages of value-chain covered by the policy</p> <p>List of timebound commitments and targets</p> <p>Description of forests-related performance standards for direct operations</p> <p>Description of forests-related standards for procurement</p>	<p>We publicly recognize the impact deforestation has on climate change, reduced biodiversity, and water scarcity and have set public goals against prioritized commodities in our supply chain that we have determined have greater potential for deforestation risk. For timber, we have goals to source only recycled or certified virgin fiber for packaging and achieve 50% combined reduction in virgin plastic and fiber packaging by 2030, We also monitor other key timber commodities for deforestation risk, including pulp and cellulose fiber in our wipes products, mill wood residuals and by-products, as well as wood char in our charcoal, to determine if they are from certified sources or grown in regions with low deforestation risk.</p> <p>In addition, the suppliers of wood used in our Kingsford charcoal business must comply with The Clorox Company’s Business Partner Code of Conduct (or have an internal equivalent code) which states that they must comply with the Lacey Act, which outlines sourcing regulations related to timber products and forest conservation practices.</p> <p>We recognize the potential business act, for example, In 2019, the Global Strategic Sourcing Team created the Timber Team, responsible for training Plant leaders on Timber commodity strategies and management at Kingsford. This team was created to align activities for all Clorox timber commodities (Fiber, Palm, Soy, and residual wood) achieving a more</p>

				<p>unified approach to better identify and align on activities that need to be implemented for the future. This new structure allows for joint engagement when applicable. For Charcoal (Hog Fuel), Clorox verified country of origin for Hog Fuel Forest commodities to ensure low deforestation risk in these supply chains. The results included implementing a new global processes to ensure all new Forest Commodity purchases meet commitments. Key tasks of the Timber Team include executing the annual packaging and wipes substrate fiber survey, updated results covering 100% of global supply and documenting all processes in our Corporate Social Responsibility Manual</p> <p>The policy is routinely reviewed, typically annually, and updated as needed.</p>
Palm oil	Yes	Company-wide	<p>Commitment to eliminate deforestation</p> <p>Commitment to protect rights and livelihoods of local communities</p> <p>Commitments beyond regulatory compliance</p> <p>Commitment to transparency</p> <p>Commitment to stakeholder awareness and engagement</p> <p>Recognition of the overall importance of forests and other natural ecosystems</p> <p>Description of business</p>	<p>We recognize the impact deforestation has on climate change, reduced biodiversity, and water scarcity and have set public goals against prioritized commodities in our supply chain that we have determined have greater potential for deforestation risk. Our Palm commitments include:</p> <ul style="list-style-type: none"> - Source CSPO for palm oil and its derivatives through RSPO physical supply chains and report on our progress through our RSPO Annual Communication of Progress (ACOP) and other public disclosures. - Ensure suppliers sourcing palm oil and palm kernel oil in our supply chain have public sustainable palm oil commitments aligned with the RSPO Principles and Criteria, including what is commonly referred to as NDPE (No Deforestation, No Peat and No Exploitation).

			<p>dependency on forests</p> <p>Description of forest risk commodities, parts of the business, and stages of value-chain covered by the policy</p> <p>List of timebound commitments and targets</p> <p>Description of forests-related performance standards for direct operations</p> <p>Description of forests-related standards for procurement</p>	<p>a. No deforestation and no development of high conservation value or high carbon stock areas</p> <p>b. No development on peat lands</p> <p>c. The protection of human rights including the respect for the rights of indigenous and local communities to give or withhold their free, prior and informed consent to operations on lands to which they hold legal, communal, or customary rights</p> <p>d. Public grievance process and response procedures for cases of non-compliance.</p> <p>- Continue to hold suppliers accountable to the principles outlined in our Business Partner Code of Conduct, including compliance with all applicable laws and regulations in the countries of operation, and respect for human rights throughout the value chain.</p> <p>- Continue mapping, tracing and/or monitoring the supply chain of our palm ingredient suppliers and ensure adherence to Clorox and their own sourcing commitments and practices.</p> <p>- Continue engaging with our suppliers, industry peers, shareholders, non-governmental organizations and other stakeholders to promote sustainable palm oil supply chains, including collaborations to strengthen certification and verification mechanisms.</p> <p>- Report annually on our progress against these commitments.</p> <p>These commitments apply to palm oil ingredients we purchase globally. Our ability to achieve these commitments depends on the changing practices of the palm industry and the future market availability of the palm derivatives used in our products.</p> <p>Palm/Fiber is documented in the new</p>
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				sustainable standards and is referenced in our BPCOC, which our suppliers are required to comply with. The policy is reviewed, typically annually, and updated as needed.
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F4.6

(F4.6) Has your organization made a public commitment to reduce or remove deforestation and/or forest degradation from its direct operations and/or supply chain?

Yes

F4.6a

(F4.6a) Has your organization endorsed any of the following initiatives as part of its public commitment to reduce or remove deforestation and/or forest degradation?

Other, please specify

Earthworm Foundation, RSPO, AIM Progress, NASPON – Participant of NASPON working group to define palm derivative ingredients and create best practices for CPG/FMCGs on collecting palm data from suppliers and supply chain mapping.

F4.6b

(F4.6b) Provide details on your public commitment(s), including the description of specific criteria, coverage, and actions.

Forest risk commodity

Timber products

Criteria

Restricting the sourcing and/or trade of forest risk commodities to credible certified sources

Operational coverage

Direct operations and supply chain

% of total production/ consumption covered by commitment

100%

Cutoff date

Not applicable

Commitment target date

2020

Please explain

We have a commitment to source only recycled or certified virgin fiber for packaging that we source. In 2020, almost 99% of the fiber in our packaging that we source was sustainably sourced or recycled content, as verified by our annual fiber survey/supplier declaration letter. We further supported this commitment with an Ignite Goal to achieve 50% combined reduction in virgin plastic and fiber packaging by 2030. In addition, the suppliers of wood used in our Kingsford charcoal business must comply with The Clorox Company's Business Partner Code of Conduct (or have an internal equivalent code) which states that they must comply with the Lacey Act, which outlines sourcing regulations related to timber products and forest conservation practices. As an example, in 2020 occurred when one of Kingsford's International customers requested that we provide certifications and wood sourcing details for our charcoal wood sourcing. Our Springfield plant reached out to their customers to confirm that the wood scrap provided to the plant was sourced from areas subject to the state's Forest Practice Act and FSC/SFI certification sources, which met the provisions of an international standard for responsible forestry. This supply chain mapping exercise not only saved the business, but showed that the recycled scrap supply chain at this plant was 80% certified.

Forest risk commodity

Palm oil

Criteria

Zero gross deforestation/ no deforestation
 No land clearance by burning or clearcutting
 No conversion of High Conservation Value areas
 No conversion of High Carbon Stock forests
 No sourcing of illegally produced and/or traded forest risk commodities

Operational coverage

Direct operations and supply chain

% of total production/ consumption covered by commitment

100%

Cutoff date

Not applicable

Commitment target date

2020

Please explain

Our palm commitments include:

- Source CSPO for palm oil and its derivatives through RSPO physical supply chains by 2025.
- Comply with environmental, health & safety, labor and social laws and regulations
- Avoid deforestation of primary and secondary forests with significant ecological value. This includes "High Carbon Stock" forests and peat lands.

- Protect biodiversity
- Provide transparency of sources back to the primary production level
- Ensure suppliers sourcing palm oil and palm kernel oil in our supply chain have public sustainable palm oil commitments aligned with the RSPO Principles and Criteria, including what is commonly referred to as NDPE (No Deforestation, No Peat and No Exploitation).
- Continue to hold suppliers accountable to the principles outlined in our BPCoC, including compliance with applicable laws and regulations in the countries of operation, and respect for human rights throughout the value chain.
- Continue mapping, tracing and/or monitoring the supply chain of our palm ingredient suppliers and ensure adherence to Clorox and their own sourcing commitments and practices.
- Continue engaging with our suppliers, industry peers, shareholders, non-governmental organizations and other stakeholders to promote sustainable palm oil supply chains, including collaborations to strengthen certification and verification mechanisms.
- Report annually on our progress against these commitments.

These commitments apply to all palm oil ingredients we purchase globally. Our ability to achieve these commitments depends heavily on the changing practices of the palm industry and the future market availability of the palm derivatives used in our products. As an example, in 2020 we evaluated 60 Fiber suppliers and identified 21 Fiber suppliers as potentially at risk for meeting our BPCoC. We are planning to send these Suppliers direct communication regarding the new BPCoC which incorporates supplier requirements of Sustainable Sourcing Standards and details of the new Responsible and Sustainable Sourcing Policy.

Clorox is a member of the Roundtable on Sustainable Palm Oil (RSPO) committed to continuing to support RSPO standards and certification as a means to drive Certified Sustainable Palm Oil (CSPO).

Clorox has supported Earthworm Foundation's Areas for Priority Transformation (APT), a program advancing long-term, landscape-level sustainability transformation in the Indonesian region of Aceh, Sumatra since 2016.

In 2019, we joined the he APT Coalition Team providing input for the multi-year strategy impacting forests, workers, livelihoods, industry and partnerships with governments, society partners and private sector actors and donors.

In 2020, we joined a multi-stakeholder project, facilitated by Business for Social Responsibility, which focuses on ensuring safety and wellbeing of workers in palm growing and harvesting in Indonesia. We supported workshops to deepen understanding of labor issues and identified a set of palm oil producers in Indonesia committed to improve plantation management practices

F5. Business strategy

F5.1

(F5.1) Are forests-related issues integrated into any aspects of your long-term strategic business plan, and if so how?

	Are forests-related issues integrated?	Long-term time horizon (years)	Please explain
Long-term business objectives	Yes, forests-related issues are integrated	5-10	<p>Forest related issues are integrated into our long-term business objectives, our strategy, and our financial planning.</p> <p>Our current long-term corporate 2030 strategy, set in 2019, integrates corporate responsibility objectives with long term business objectives. These include our goal to have all fiber-based packaging we source (cartons, corrugates, displays and bags) to be made with either recycled or certified virgin fiber, as well as our goal to ensure our palm oil ingredients meet our responsible sourcing commitments by and achieve 50% combined reduction in virgin plastic and fiber packaging by 2030 and achieve 100% recyclable, reusable or compostable packaging by 2025.</p> <p>We integrate our Corporate Responsibility strategy and metrics with our long-term business strategy because we believe our short and long-term success lies in our focus on driving good-growth, growth that is not just profitable and sustainable, but also achieved responsibly. We believe addressing deforestation and its impact on climate change is an important aspect of conducting business responsibly.</p> <p>The new Responsible and Sustainable Sourcing Policy was implemented in June of 2021 which includes Responsible Sourcing Standards for all suppliers, Sustainable Sourcing Standards for raw material suppliers and Carbon Reduction standards for selected suppliers.</p> <p>These requirements will be required for all suppliers effective immediately as the standards are included in the Clorox Business Partner Code of Conduct. Supplier notifications will be sent in Q1 of FY22 by the Clorox Global Strategic Sourcing Center of Excellence team.</p>

<p>Strategy for long-term objectives</p>	<p>Yes, forests-related issues are integrated</p>	<p>5-10</p>	<p>Forest related issues are integrated into our long-term business objectives, our strategy, and our financial planning.</p> <p>Our current long-term 2030 Ignite strategy integrates corporate ESG objectives with our long term business objectives. These include our goal to have all fiber-based packaging we source (cartons, corrugates, displays and bags) to be made with either recycled or certified virgin fiber, as well as our goal to ensure our palm oil ingredients meet our responsible sourcing commitments and achieve 50% combined reduction in virgin plastic and fiber packaging by 2030 and achieve 100% recyclable, reusable or compostable packaging by 2025. Each business unit leadership team, led by a VP-General Manager, is responsible for defining and achieving a strategic sustainability plan for its portfolio of brands that will help deliver corporate IGNITE ESG goals and advance its brands towards becoming a sustainable business. Each business unit leadership team designates a sustainability champion to lead its sustainability agenda and monitor progress.</p> <p>We integrate our Corporate Responsibility strategy and metrics with our long-term business strategy because we believe our success lies in our focus on driving growth that is not just profitable and sustainable, but also achieved responsibly.</p> <p>Our strategy to minimize the impact of packaging fiber sourcing starts by reducing the amount used. Next, we work to maximize recycled fiber in packaging. When virgin fiber is required, we seek to ensure our suppliers source from sustainable forests and that responsible forestry practices have been followed.</p> <p>Our Kingsford Manufacturing Division uses mill wood residuals and by-products to create charcoal briquettes. We minimize our footprint by not cutting down trees for use in manufacturing.</p> <p>Clorox sources a low volume of palm oil ingredients for its operations, 99% being palm oil or palm kernel oil derivatives, less than 0.003 percent of palm oil produced globally each year. Although our use is small, we are committed to ensuring our sourcing of palm-derived materials does not contribute to deforestation, peat clearance or infringe upon the rights of workers and indigenous peoples. We believe the most effective way to influence supply chain is through collaboration and</p>
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			partnership with our suppliers, consumer packaged goods peers and nongovernmental organizations.
Financial planning	Yes, forests-related issues are integrated	5-10	<p>Forest related issues are integrated into our long-term business objectives, our strategy, and our financial planning.</p> <p>Our current long-term, 2030 Ignite strategy, set in 2019, integrates corporate responsibility objectives with business objectives. These include our goal to have all fiber-based packaging we source (cartons, corrugates, displays and bags) to be made with either recycled or certified virgin fiber, as well as our goal to ensure our palm oil ingredients meet our responsible sourcing commitments and achieve 50% combined reduction in virgin plastic and fiber packaging by 2030 and achieve 100% recyclable, reusable or compostable packaging by 2025.</p> <p>Resources required to deliver the Corporate Responsibility Strategy are considered as part of the long-term strategy process. Financial costs associated with our forest related Ignite Goals, both increases and decreases, are evaluated and included as part of our financial planning processes. For example, reduction of virgin fiber in our packaging might be captured as a cost savings if we can achieve volume reductions or as a cost increase if we have to substitute it with more expensive recycled content. Similarly, our financial planning will incorporate costs associated with transitioning to packaging that is 100% reusable, recyclable, or compostable.</p> <p>We integrate our Corporate Responsibility strategy and metrics with our long-term business strategy because we believe our short and long-term success lies in our focus on driving good-growth, growth that is not just profitable and sustainable, but also achieved responsibly. We believe addressing deforestation and its impact on climate change is an important aspect of conducting business responsibly.</p>

F6. Implementation

F6.1

(F6.1) Did you have any timebound and quantifiable targets for increasing sustainable production and/or consumption of your disclosed commodity(ies) that were active during the reporting year?

Yes

F6.1a

(F6.1a) Provide details of your timebound and quantifiable target(s) for increasing sustainable production and/or consumption of the disclosed commodity(ies), and progress made.

Target reference number

Target 1

Forest risk commodity

Timber products

Type of target

Third-party certification

Description of target

Restricting the sourcing and/or trade of forest risk commodities to credible certified sources that we purchase from.

Linked commitment

Zero net/gross deforestation

Traceability point

Third-party certification scheme

FSC Forest Management certification
FSC Chain of Custody
PEFC Sustainable Forest Management certification
PEFC Chain of Custody
SFI Forest Management standard
SFI Chain of Custody

Start year

2012

Target year

2020

Quantitative metric**Target (number)****Target (%)**

100

% of target achieved

98.7

Please explain

We have ongoing commitment to source only recycled or certified virgin fiber for packaging that we purchase directly. Currently, almost 99% of the fiber used in the packaging we purchase meets this criteria, as verified by our annual fiber survey/supplier declaration letters. Of this volume, approximately 53% of our fiber based packaging is recyclable and 46% is virgin packaging from a certified source (1% is not certified). We estimate that this volume represents packaging used in approximately 90-95% of our global business (NCS \$). We plan to incorporate this requirement into our specifications and contracts in the future.

Target reference number

Target 2

Forest risk commodity

Palm oil

Type of target

Third-party certification

Description of target

Our intent is to source all of our palm oil sustainably. We seek to ensure that purchases of palm derived ingredients do not contribute to deforestation, peat clearance and human rights abuses. Actions include:

- Refine and implement our plan to source RSPO certified palm oil, palm kernel oil and their derivatives by 2025 for global volume
- Continue to monitor supply and work closely with our suppliers to achieve this commitment, including periodic field visits to mills and plantations.
- Report annually on progress against these commitments.
- Engage with our suppliers, industry peers, shareholders, non-governmental organizations and other stakeholders to promote sustainable palm oil supply chains and to strengthen certification and verification mechanisms.

Our ability to achieve this commitment depends heavily on the changing practices of the palm industry and the future market availability of the palm derivatives used in our products.

Linked commitment

Zero net/gross deforestation

Traceability point

Third-party certification scheme

RSPO Mass Balance

Start year

2015

Target year

2025

Quantitative metric

Target (number)

Target (%)

100

% of target achieved

41

Please explain

Our ambition is 100% RSPO by 2025 which is an aggressive goal given that more than 99% of our palm footprint is related to derivatives of palm oil and palm kernel oil. It is our experience that commercial availability of these ingredients does not meet global demand, and the assortment of palm derivatives are not all available from RSPO-certified manufacturers or producers with only 15% of global volume being available from certified sources. We are further limited in the use of RSPO-certified sustainable palm derivatives because our Palm Oil Responsible Sourcing Commitment includes many provisions and requirements beyond those set forth in RSPO Principles and Criteria. We established our Palm Oil Responsible Sourcing Commitment in 2015 and believe our responsibility is to source palm-derived ingredients in a manner that doesn't contribute to deforestation, protects peatlands and respects human rights in our sourcing communities. As a result, we identified specific palm oil production areas within our supply chain and acted on this new information by investing in a landscape-level transformation projects. For CY20, we have 41% RSPO certified palm derivative ingredients and continued to increase our level of commitment through our actions as we move towards our goal of 100% certification.

Target reference number

Target 3



Forest risk commodity

Palm oil

Type of target

Traceability

Description of target

Enable 3rd party verification of our supply chain traceability for priority suppliers. We committed to tracing our priority suppliers (>50MT of volume) to the mill. In 2019, we expanded our palm traceability globally reviewing 400 additional tons of palm in our supply chain. In 2020, we educated all palm suppliers on our palm commitment and engage directly with priority palm suppliers. Engagement included training for suppliers' sales force, sustainability, procurement, and regulatory teams. Through the Earthworm Foundation, Clorox is a part of a palm derivative working group of key CPG/FMCGs uniting in our efforts to educate and lead the effort in transformation of building supplier capabilities to protect forests. In 2021, we hired additional resources to support the implementation of a grievance mechanism for palm. We continue to train palm suppliers on our palm commitment and we assist priority suppliers with palm policies, as needed..

Linked commitment

Traceability point

Mill

Third-party certification scheme

Start year

2015

Target year

2025

Quantitative metric

Target (number)

Target (%)

100

% of target achieved

97.3

Please explain

The company's sourcing of palm oil ingredients is limited to approximately 99% derivatives of palm and palm kernel oil. Our time-bound action plan outlines key milestones for achieving our 2025 goals and the implementation of our Palm Oil

Responsible Sourcing Commitment. Through outreach with our global suppliers — we have made progress against goals and raised awareness of the larger industry challenges involved with sourcing of palm oil derivatives.

In 2020 we traced 2019 domestic business palm oil derivative purchases, achieving a 96.3% traceability to the origin refiner and a 97.3% traceability to the mill. The percent of total production/consumption volume reported represents the number of shipments of palm oil derivatives by our suppliers traced by Earthworm to the applicable jurisdiction. Our aim is to promote increased transparency throughout the industry and moving it toward impactful change on the ground. As a result of our tracing work, we identified specific palm oil production areas within our supply chain and have acted on this information by investing in landscape-level transformation projects since 2017

Target reference number

Target 4

Forest risk commodity

Timber products

Type of target

Other, please specify
Product Level

Description of target

Our commitment starts with reducing the amount of fiber we use by increasing the percentage of paper from recycled. We have a goal to achieve a 50% combined reduction in virgin plastic and fiber packaging by 2030.

Linked commitment

Other environmental commitments

Traceability point

Third-party certification scheme

Start year

2018

Target year

2030

Quantitative metric

Absolute number

Target (number)

0.38

Target (%)**% of target achieved**

21

Please explain

In 2019, Clorox announced an ambitious set of environmental, social and governance (ESG) leadership goals integrated with our strategic business choices, as part of its long-term corporate strategy called Ignite. These ESG goals include a 50% combined reduction in virgin plastic and fiber packaging by 2030.

In 2018 we calculated that our packaging had 0.75 pounds of plastic or fiber per stat case sold. In 2020, we reduced the volume of plastic or fiber in our packaging to 0.67 pounds per stat case sold. This was achieved through by reducing our primary and secondary fiber packaging volumes, compacting our bleach products, and other light-weighting efforts. Overall this was an 11% improvement over our 2018 baseline toward our 0.38 lbs per stat case target and we achieved 21% of the target in 2020 $[(0.67 - 0.75) / (0.38 - 0.75)]$

The coverage target includes all plastic and fiber packaging that we purchase for our operationally controlled manufacturing facilities globally, as well as plastic and fiber packaging purchased by contract manufacturers for our domestic businesses. Due to data limitations it excludes packaging purchased by contract manufacturers for our international operations. Our 50% reduction target is an intensity target measured per case of product sold versus a 2018 base year.

Additional resources have been adding to the Global Strategic Sourcing team to track supplier metrics and set reduction goals with the suppliers. Supplier self- assessment questionnaires have been developed in two key areas: Capability of suppliers for PCR and fiber recyclability content and human rights awareness in the collection facilities of 2nd and 3rd tier suppliers. These assessment will be required for all packaging RFPs globally. In addition to KPI tracking through the Global Strategic Sourcing tool, SRM (Supplier Relationship Management), a supplier scorecard has been developed to rank suppliers on their efforts. The Supplier Scorecard will be implemented in 2021.

Target reference number

Target 5

Forest risk commodity

Timber products

Type of target

Other, please specify

Reduced consumption of virgin materials

Description of target

100% recyclable, reusable or compostable packaging by 2025

Linked commitment

Other environmental commitments

Traceability point

Third-party certification scheme

Start year

2018

Target year

2025

Quantitative metric

Percentage

Target (number)

Target (%)

100

% of target achieved

76

Please explain

Climate related risks and opportunities are at the forefront of our decision making processes to ensure that Clorox remains a leader in corporate responsibility while maintaining Purpose Driven Growth. In 2019, Clorox announced an ambitious set of environmental, social and governance (ESG) leadership goals integrated with our strategic business choices, as part of its long-term corporate strategy called Ignite. These ESG goals include 100% recyclable, reusable, or compostable packaging by 2025. In 2020 we calculated that 0.75% of our packaging was recyclable, reusable, or compostable, at the material level.

The coverage target includes all primary (consumer-facing). In 2020 we were able to increase the percent of packaging that is reusable, recyclable, or compostable versus our 2018 baseline. Data has been calculated using the Ellen MacArthur Foundation's recyclability assessment tool, which is based on the findings of their New Plastics Economy 2021 Recycling Survey and the Ellen MacArthur Foundation's definition of recyclable packaging. Percent of target achieved is calculated based on CY18 US sales data and is estimated to reflect global results for this metric. This goal encourages a circular economy by helping to increase the amount of packaging available for reuse/recycling and contributes to fewer GHG emissions associated single-use packaging and landfilling.

F6.2

(F6.2) Do you have traceability system(s) in place to track and monitor the origin of your disclosed commodity(ies)?

	Do you have system(s) in place?	Description of traceability system	Exclusions	Description of exclusion
Timber products	Yes	We regularly engage with our suppliers of mill wood residuals and by-products used to make our charcoal as well as wood char for one charcoal product line and understand all sourcing regions to be in the U.S.	Not applicable	
Palm oil	Yes	We trace our palm derivative ingredients back to the First Refiner and mill in support of our target.	Other, please specify	Excludes lower volume suppliers (<50 MT)

F6.2a

(F6.2a) Provide details on the level of traceability your organization has for its disclosed commodity(ies).

Forest risk commodity	Point to which commodity is traceable	% of total production/consumption volume traceable
Timber products	Country	99
Palm oil	Refinery	96.3
Palm oil	Mill	97.3

F6.3

(F6.3) Have you adopted any third-party certification scheme(s) for your disclosed commodity(ies)?

	Third-party certification scheme adopted?	% of total production and/or consumption volume certified
Timber products	Yes	
Palm oil	Yes	

F6.3a

(F6.3a) Provide a detailed breakdown of the volume and percentage of your production and/or consumption by certification scheme.



Forest risk commodity

Timber products

Third-party certification scheme

FSC Chain of Custody

Chain-of-custody model used

% of total production/consumption volume certified

29.2

Form of commodity

Primary packaging
Secondary packaging
Tertiary packaging

Volume of production/ consumption certified

44,722

Metric for volume

Metric tons

Is this certified by more than one scheme?

No

Please explain

Almost 99% of the fiber used in packaging we source is from supplier's certified virgin or recycled sources. Across our approximately 152,939 metric tons fiber used in packaging materials we purchase, approximately 17% is SFI certified material, 29% is FSC certified material, 0.3% is PEFC certified material, and 1% is virgin material that is not certified. The remaining 53% is recycled fiber.

We estimate that this volume represents packaging used in approximately 90-95% of our global business (NCS \$). We are continuing to make progress towards reaching our goal of 100% recycled or certified virgin fiber in our packaging. In addition, the suppliers of our timber based products must comply with The Clorox Company's Business Partner Code of Conduct (or have an internal equivalent code) which states that they must comply with the Lacey Act, which outlines sourcing regulations related to timber products and forest conservation practices.

Forest risk commodity

Timber products

Third-party certification scheme

PEFC Chain of Custody

Chain-of-custody model used



% of total production/consumption volume certified

Form of commodity

- Cellulose-based textile fiber
- Other, please specify
 - paper-based pulp

Volume of production/ consumption certified

11,000

Metric for volume

Metric tons

Is this certified by more than one scheme?

No

Please explain

Clorox uses wood-based fiber in some of our products — namely Clorox® disinfecting wipes, Green Works® compostable cleaning wipes, Burt's Bees® towelettes and Burt's Bees® baby wipes. We do not purchase this fiber directly and not all suppliers provide the certification chain of custody.

However, we contacted our suppliers and approximately 97% or 28,944 metric tons of the tree-based material in our wipes is “certifiable” because it comes from certified sources (60% FSC and 37% PEFC or SFI). The supplier of the PEFC certified fiber provides a copy of the certification to Clorox

Forest risk commodity

Timber products

Third-party certification scheme

SFI Chain of Custody

Chain-of-custody model used

% of total production/consumption volume certified

16.5

Form of commodity

- Primary packaging
- Secondary packaging
- Tertiary packaging

Volume of production/ consumption certified

25,175



Metric for volume

Metric tons

Is this certified by more than one scheme?

No

Please explain

Almost 99% of the fiber we source for our packaging is from supplier's certified virgin or recycled sources. Across our approximately 152,939 metric tons fiber used in packaging materials we purchase, approximately 17% is SFI certified material, 29% is FSC certified material, 0.3% is PEFC certified material, and 1% is virgin material that is not certified. The remaining 53% is recycled fiber.

We estimate that this volume represents packaging used in approximately 90-95% of our global business (NCS \$). We are continuing to make progress towards reaching our goal of 100% recycled or certified virgin fiber in our packaging. In addition, the suppliers of our timber based products must comply with The Clorox Company's Business Partner Code of Conduct (or have an internal equivalent code) which states that they must comply with the Lacey Act, which outlines sourcing regulations related to timber products and forest conservation practices

Forest risk commodity

Timber products

Third-party certification scheme

PEFC Chain of Custody

Chain-of-custody model used

% of total production/consumption volume certified

0.3

Form of commodity

Primary packaging
Secondary packaging
Tertiary packaging

Volume of production/ consumption certified

430

Metric for volume

Metric tons

Is this certified by more than one scheme?

No

Please explain

Almost 99% of the fiber used in our packaging we source is from supplier's certified virgin or recycled sources. Across our approximately 152,939 metric tons fiber used in packaging materials we purchase, approximately 17% is SFI certified material, 29% is FSC certified material, 0.3% is PEFC certified material, and 1% is virgin material that is not certified. The remaining 53% is recycled fiber.

We estimate that this this volume represents packaging used in approximately 90-95% of our global business (NCS \$). We are continuing to make progress towards reaching our goal of 100% recycled or certified virgin fiber in our packaging. In addition, the suppliers of our timber based products must comply with The Clorox Company's Business Partner Code of Conduct (or have an internal equivalent code) which states that they must comply with the Lacey Act, which outlines sourcing regulations related to timber products and forest conservation practices.

Forest risk commodity

Palm oil

Third-party certification scheme

RSPO Mass Balance

Chain-of-custody model used

% of total production/consumption volume certified

41

Form of commodity

Palm oil derivatives

Palm kernel oil derivatives

Volume of production/ consumption certified

850

Metric for volume

Metric tons

Is this certified by more than one scheme?

No

Please explain

Clorox's sourcing of palm oil ingredients is limited to 99% derivatives of palm and palm kernel oil. Typically present in very small percentages as sub-components of surfactants, fatty alcohols, emulsifiers or fragrances, palm oil derivatives are used in some of our cleaning, food, and natural personal care products. While Clorox's total palm oil ingredient volume represents less than 0.003 percent of palm oil produced globally each year we are committed to working with our suppliers, other companies and the civic sector to address environmental and social issues in the sector. As part of that



effort, Clorox has been an RSPO member since 2016 and supported 2018 updates to the P&Cs, including strengthening commitments to: incorporate the High Carbon Stock Approach (HCSA) to further address deforestation, requirement for no new planting of palm oil on peatlands regardless of depth, and significant improvements to the RSPO P&C with respect to labor rights and practices. Clorox is now working plans to move to RSPO certified palm material by 2025. We expect to implement a mandatory request for new materials and suppliers to provide RSPO Mass Balance certified materials, and review contracts and supply agreement to start negotiating the certified volumes for all existing materials to meet our certification objectives. Since Clorox only sources palm derivatives, we recognize our ability to achieve this commitment depends heavily on the changing practices of the palm industry and the future market availability of the palm derivatives used in our products. In addition to certification, we continue partnering with Earthworm Foundation and current suppliers of palm oil ingredients on plans to trace our ingredient supply chain, and help to ensure that palm derivative ingredients we source meet our comprehensive responsible sourcing commitments.

In 2020 we confirmed that approximately 850 metric tons of our 2076 global volume was RSPO certified. This includes domestic (482/1078) and international (368/368) purchases.

F6.4

(F6.4) For your disclosed commodity(ies), do you have a system to control, monitor, or verify compliance with no conversion and/or no deforestation commitments?

	A system to control, monitor or verify compliance
Timber products	Yes, we have a system in place for our no conversion and/or deforestation commitments
Palm oil	Yes, we have a system in place for our no conversion and/or deforestation commitments

F6.4a

(F6.4a) Provide details on the system, the approaches used to monitor compliance, the quantitative progress, and the non-compliance protocols, to implement your no conversion and/or deforestation commitment(s).

Forest risk commodity

Timber products

Operational coverage

Supply chain

Description of control systems

A few tools are used to monitor compliance to implement our no deforestation commitment. Education for our supply chain and the specific team members. Timber

engagement in person and on-line training deck for buyers supporting our supply chain. Our Responsible Sourcing & Sustainability Manager traveled to various Kingsford facilities to educate with plant leadership, and buyers on our commitment to no deforestation regarding timber commodities. In 2019 the Timber Team was created in Global Strategic Sourcing to support and align on activities. This tea, allows for joint engagement when applicable with these commodities.

As part of our commitment to responsible business practices, we require our suppliers to abide by our Business Partner Code of Conduct (BPCoC) and our policies; Responsible and Sustainable Sourcing, Human Rights, Environmental and Freedom of Association . We require our suppliers to share our sourcing Policy, standards, and our BPCoC with their upstream suppliers.

Monitoring and verification approach

Other, please specify
In-House Timber Team

% of total volume in compliance

Don't know

% of total suppliers in compliance

81-90%

Response to supplier non-compliance

Retain & engage

Procedures to address and resolve non-compliance with suppliers

Providing information on appropriate actions that can be taken to address non-compliance

Please explain

Adherence to the our Business Partner Code of Conduct (BPCOC) is required for all suppliers. Our BPCOC supports our ESG commitments related to human rights and labor, respectful treatment and equal opportunity, anti-corruption, and environmental sustainability. When information of any non-compliance in our supply chain occurs, Clorox reviews the details and our supply chain to understand if the non-compliance touch any part. When needed Clorox notifies our suppliers to request action if the non-compliance is within their supply chain.

In 2021, Clorox developed a fiber questionnaire to be used for all fiber supplier requests for quotes. The questionnaire, along with a human rights questionnaire, is now included in our Salesforce Scout survey tool as a template to ensure that suppliers are complying with our BPCoC.

This commitment and supplier compliance is not only referenced in all contracts, but included as a requirement in the Clorox Supplier Onboarding Tool. A digital dashboard for all suppliers that allows us to track compliance with the BPCoC signatory requirements is maintained electronically and updated monthly, and is reported to management for any required actions. Approximately 90% of all suppliers globally by spend have signed or agreed to our BPCoC, which we are considering in compliance. We do not track the number of Timber specific suppliers. We have a separate audit process to check compliance with the BPCoC.

Forest risk commodity

Palm oil

Operational coverage

Supply chain

Description of control systems

We perform a Global Annual Risk Assessment of direct suppliers for location sites, spend and audit history. The Sedex Radar Risk tool is used to evaluate all high and some medium risk suppliers, with an in-depth review including: forced labor, child labor, deforestation, freedom of association, children & young workers, wages, working hours, discrimination, gender, regular employment, biodiversity, energy & emissions, waste & pollution and water. We use our Global Quality Assurance team's internal risk assessment which consists of 4 areas: nonconformance, material supplier type, product micro risk sensitivity.

All direct high risk suppliers are asked to perform a SMETA 4 Pillar Social Compliance audit which includes a review of environmental practices and business ethics, labor and health & safety. We use the Sedex Radar tool for deforestation and biodiversity risk. Ground monitoring was managed by Earthworm Foundation, in Indonesia forests where palm is sourced for our ingredients.

Monitoring and verification approach

Ground-based monitoring system

Community-based monitoring

Third-party verification

% of total volume in compliance

91-99%

% of total suppliers in compliance

81-90%

Response to supplier non-compliance

Retain & engage

Procedures to address and resolve non-compliance with suppliers

Developing time-bound targets and milestones to bring suppliers back into compliance

Please explain

Adherence to the Clorox Supplier Business Partner Code of Conduct (Code) is required for all suppliers and our 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.

When information of any non-compliances in our supply chain occurs, Clorox reviews

the details and our supply chain mapping risk analysis tools to understand if the non-compliance touch any part of our supply chain. When needed Clorox notifies our suppliers to request action if the non-compliance is within their supply chain. Approximately 90% of all suppliers by spend have signed or agreed to our BPCoC, we do not track the number of Timber specific suppliers. The reported percentages represent the approximate number of Palm derivative suppliers by spend and by volume that have signed the BPCoC, which we are considering in compliance.

F6.6

(F6.6) For your disclosed commodity(ies), indicate if you assess your own compliance and/or the compliance of your suppliers with forest regulations and/or mandatory standards.

	Assess legal compliance with forest regulations	Comment
Timber products	No, we do not assess legal compliance	We review all suppliers annually to assess risk for third-party auditing. We implemented into our annual review the use of the new Sedex Radar Tool. In addition, the Sedex Radar Risk Tool is used to prescreen potential suppliers for risk and review biodiversity impact at supplier locations. The biodiversity impact will be reviewed annually starting in 2020 for all high risk global suppliers in our supply chain to determine if an audit is required each year and understand potential risks and action plans.
Palm oil	No, we do not assess legal compliance	We review all suppliers annually to assess risk for third-party auditing. We implemented into our annual review the use of the new Sedex Radar Tool. In addition, the Sedex Radar Risk Tool is used to prescreen potential suppliers for risk and review biodiversity impact at supplier locations. The biodiversity impact will be reviewed annually starting in 2020 for all high risk global suppliers in our supply chain to determine if an audit is required each year and understand potential risks and action plans.

F6.7

(F6.7) Are you working with smallholders to support good agricultural practices and reduce deforestation and/or conversion of natural ecosystems?

	Are you working with smallholders?	Type of smallholder engagement approach	Smallholder engagement approach	Number of smallholders engaged	Please explain
Timber products	Not applicable				

Palm oil	Yes, working with smallholders				As a member of RSPO, we indirectly support independent smallholders, defined as palm oil smallholders not bound by any contract, credit agreement or planning to a particular palm oil mill. This support covers fair and transparent dealings with Smallholders and improved Smallholder livelihoods. We supported a series of workshops for the smallholders in Indonesia through the Business for Social Responsibility.
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F6.8

(F6.8) Are you working with your direct suppliers to support and improve their capacity to comply with your forests-related policies, commitments, and other requirements?

	Are you working with direct suppliers?	Type of direct supplier engagement approach	Direct supplier engagement approach	% of suppliers engaged	Please explain
Timber products	Yes, working with direct suppliers	Supply chain mapping Other	Supplier questionnaires on environmental and social indicators Supplier audits		We don't currently track the percentage of Timber suppliers that we engage. We estimate that we reach out to our priority suppliers for wipes and packaging and certain hog fuel suppliers, which represent 20-30 % of our total timber suppliers. Activities include collecting data in central database Encouraging certification Encouraging work with multi-stakeholder groups Supplier questionnaires on environmental and social



					indicators.
Palm oil	Yes, working with direct suppliers	Supply chain mapping	Supplier questionnaires on environmental and social indicators Supplier audits		<p>A comprehensive risk assessment was performed in 2019, identifying High Impact Suppliers, and will be utilized to engage with high priority suppliers to bring visibility of their supply chains and support landscape level initiatives. We reach out to 100% of all Palm derivative suppliers annually, to engage on our Palm commitment. We further engage priority suppliers on their specific policies, commitments, traceability, etc.... estimated to represent 80-90percent of our global business palm oil derivative purchases.</p> <p>Activities include:</p> <ul style="list-style-type: none"> - Collecting data in central database -Encouraging certification -Encouraging work with multi-stakeholder groups- Supplier questionnaires on environmental and social indicators- Supplier audits- Meet annually with priority suppliers of palm and are sharing risk data with suppliers as we obtain risk profiles for the various regions of their supply chain -Communicate annually with all palm suppliers our commitments and other requirements for certification options.

F6.9

(F6.9) Are you working beyond your first-tier supplier(s) to manage and mitigate deforestation risks?

	Are you working beyond first tier?	Type of engagement approach with indirect suppliers	Indirect supplier engagement approach	Please explain
Timber products	No, not working beyond the first tier			We publicly recognize the impact deforestation has on climate change, reduced biodiversity, and water scarcity and have set public goals against prioritized commodities in our supply chain that we have determined have greater potential for deforestation risk. For timber, we have goals to source only recycled or certified virgin fiber for packaging, and achieve 50% combined reduction in virgin plastic and fiber packaging by d, We also monitor other key timber commodities for deforestation risk, including pulp and cellulose fiber in our wipes products, mill wood residuals and by-products, as well as wood char in our charcoal, to determine if they are from certified sources or grown in regions with low deforestation risk.
Palm oil	Yes, working beyond first tier	Supply chain mapping	Supplier audits	Our approach to meeting our responsible palm oil commitments is rooted in supplier engagement designed to educate our suppliers of derivative ingredients about the issues in palm oil supply chains, encourage and assist as necessary in strengthening their own policies, help in tracing their supply chains back to the mill and subsequently to the plantation, and identifying key points in the supply chain where we can help influence change and support transformation on the ground.

F6.10

(F6.10) Do you participate in external activities and/or initiatives to promote the implementation of your forests-related policies and commitments?

Forest risk commodity

Timber products

Do you participate in activities/initiatives?

Yes

Activities

Involved in multi-partnership or stakeholder initiatives

Initiatives

UN Global Compact

Forest Stewardship Council (FSC)

Programme for the Endorsement of Forest Certification (PEFC)

Sustainable Forestry Initiative (SFI)

Other, please specify

The Consumer Good Forum (CGF)

Jurisdictional approaches

Please explain

In addition to requiring certifications for virgin packaging fiber, thereby increasing demand for more sustainable forest risk commodities, we are members of the Sustainable Packaging Coalition and Consumer Goods Forum, signatories to UN Global Compact, and have invested in partnerships through Earthworm/The Forest Trust and AIM-Progress to engage our suppliers and collaborate within industry..

Forest risk commodity

Palm oil

Do you participate in activities/initiatives?

Yes

Activities

Involved in multi-partnership or stakeholder initiatives

Initiatives

UN Global Compact

Roundtable on Sustainable Palm Oil (RSPO)

Other, please specify

The Consumer Good Forum (CGF), NASPON, RSPO, Earthworm Foundation, APT (Areas of Priority Transformation) Steering Committee

Jurisdictional approaches

Please explain

In addition, requiring responsibly sourced palm oil, we are also engaging with our suppliers to raise awareness of issues in supply chains, particularly in derivative palm

ingredient supply chains. We have invested in partnerships through The Natural Resources Stewardship Circle, Earthworm Foundation, and AIM-Progress to engage our suppliers and collaborate within industry. In 2020, Clorox was part of the Derivatives Working Group at NASPON (North American Sustainable Palm Oil Network) developing best practices for CPG's purchasing palm oil including a derivatives list with detailed ingredients that contain palm oil, palm kernel oil, or palm derivatives. In addition, NASPON developed a Segregated Map along with FAQs for brands purchasing palm oil in their supply chain. One other outcome of this team was the creating the Education and Outreach Working Group which developed a vendor survey/evaluation to collect palm oil data for the ACOP (Annual Communication of Palm).

In 2019 Clorox joined the APT Steering Committee to have direct input on direction of the implementation of the APT Programme and targeting interventions supporting the APT Coalition, Norad, and other private sector supporters. This team through Earthworm Foundation in Indonesia mobilizes its resources and that of the local partners to support the decoupling of deforestation from supply chains in Aceh, the strengthening of NDPE policies and practices by commercial actors, and improvement of livelihood prospects by communities in two Leuser-connected APT landscapes. Key activities and KPIs are tracked and reported quarterly including government and multi-stakeholder capacity-building and coordination, eliminating deforestation inside palm oil concessions, reducing deforestation by palm oil smallholders, strengthening NDPE practices of plantations and mills, and robust data & monitoring to support interventions and communications.

F6.11

(F6.11) Is your organization supporting or implementing project(s) focused on ecosystem restoration and protection?

No

F7. Verification

F7.1

(F7.1) Do you verify any forests information reported in your CDP disclosure?

No, we do not verify any forests-related information reported in our CDP disclosure, and there are no plans to do so

F8. Barriers and challenges

F8.1

(F8.1) Describe the key barriers or challenges to eliminating deforestation and/or conversion of other natural ecosystems from your direct operations or from other parts of your value chain.

Forest risk commodity

Coverage

Supply chain

Primary barrier/challenge type

Limited availability of certified materials

Comment

The company's sourcing of palm oil ingredients is limited to 99% derivatives of palm and palm kernel oil. It is our experience that commercial availability and assortment of palm derivatives is not all available from RSPO-certified manufacturers or producers. The supply chains for palm derivative ingredients are multi-tiered and far more challenging versus those for palm oil. As traceability is the first step to better understanding risk and determining key leverage points in the supply chain where we can influence change and support transformation activities on the ground, our timeline is subject to change based on more learning and the progress of our suppliers.

We have updated our Palm commitment, in part, to address these challenges:

- Source CSPO for palm oil and its derivatives through RSPO physical supply chains by 2025.
- Ensure suppliers sourcing palm oil and palm kernel oil in our supply chain have public sustainable palm oil commitments aligned with the RSPO Principles and Criteria, including what is commonly referred to as NDPE (No Deforestation, No Peat and No Exploitation).
- Continue to hold suppliers accountable to the principles outlined in our Business Partner Code of Conduct, including compliance with all applicable laws and regulations in the countries of operation, and respect for human rights throughout the value chain.
- Continue mapping, tracing and/or monitoring the supply chain of our palm ingredient suppliers and ensure adherence to Clorox and their own sourcing commitments and practices.
- Continue engaging with our suppliers, industry peers, shareholders, non-governmental organizations and other stakeholders to promote sustainable palm oil supply chains, including collaborations to strengthen certification and verification mechanisms.
- Report annually on our progress against these commitments

These commitments apply to all palm oil ingredients we purchase globally. Our ability to

achieve these commitments depends heavily on the changing practices of the palm industry and the future market availability of the palm derivatives used in our products.

Forest risk commodity

Palm oil

Coverage

Supply chain

Primary barrier/challenge type

Supply chain complexity

Comment

We currently have a goal to ensure that all our palm / palm kernel oil ingredients are responsibly sourced. We are partnering with Earthworm Foundation and our current suppliers of palm oil ingredients on a plan to help ensure that the ingredients used in our products meet our comprehensive responsible sourcing commitments, including criteria around traceability, deforestation, peatland preservation and high-carbon stock forest conservation, and business ethics and human rights. The company's sourcing of palm oil ingredients is limited to derivatives of palm and palm kernel oil. It is our experience that commercial availability of such oleo-chemical ingredients does not meet global demand, and the assortment of palm derivatives is not all available from RSPO-certified manufacturers or producers. The supply chains for palm derivative ingredients are multi-tiered and far more challenging versus those for palm oil. In our work so far we have learned they are often more complex than we anticipated when establishing our targets. As traceability is the first step to better understanding risk and determining key leverage points in the supply chain where we can influence change and support transformation activities on the ground, our timeline is subject to change based on more learning and the progress of our suppliers

F8.2

(F8.2) Describe the main measures that would improve your organization's ability to manage its exposure to deforestation and/or conversion of other natural ecosystems.

Forest risk commodity

Palm oil

Coverage

Supply chain

Main measure

Investment in monitoring tools and traceability systems

Comment



Industry development of comprehensive and cost-effective monitoring tools and traceability systems would greatly reduce the cost, complexity, and redundancy of work involved in assessing risk and monitoring compliance with palm oil sourcing requirements, enabling more resources to be deployed towards transforming and ultimately achieving the vision of a sustainable palm oil industry.

F17 Signoff

F-FI

(F-FI) Use this field to provide any additional information or context that you feel is relevant to your organization's response. Please note that this field is optional and is not scored.

F17.1

(F17.1) Provide the following information for the person that has signed off (approved) your CDP forests response.

	Job Title	Corresponding job category
Row 1	Environmental & Sustainability Manager	Environment/Sustainability manager

SF. Supply chain module

SF0.1

(SF0.1) What is your organization's annual revenue for the reporting period?

	Annual revenue
Row 1	7,524,000,000

SF0.2

(SF0.2) Do you have an ISIN for your organization that you are willing to share with CDP?

No

SF1.1

(SF1.1) In F6.3 you were asked "Have you adopted any third-party certification scheme(s) for your disclosed commodity(ies)? Indicate the volume and percentage of your certified production and/or consumption". Can you also indicate, for each of your disclosed commodity(ies), the percentage of certified volume sold to each requesting CDP supply chain member?

Yes

SF1.1a

(SF1.1a) For each of your requesting CDP supply chain members, indicate the percentage of certified volume sold per disclosed commodity(ies).

Requesting member

Walmart, Inc.

Forest risk commodity

Timber products

Form of commodity

Primary packaging

Secondary packaging

Tertiary packaging

Third-party certification scheme

FSC Chain of Custody

Total volume of commodity sold to member

32,882

Metric

Metric tons

What % of the volume reported in column 5 is certified?

21-30%

Comment

Our total packaging fiber volumes sold to Walmart USA/Sam's Club USA is approximately 32,882 metric tons. Of that volume, approximately 46% is certified virgin fiber (15,120 MT) with 53% of the volume being recycled fiber (and 1% not certified or recycled. Of our certified packaging fiber volume reported, approximately 35% is SFI certified, 62% FSC certified and 1% PEFC certified (multiply by 0.46 to calculate the total certified with the remaining being recycled content). The volume of the commodity sold to Walmart USA (including Sam's Club USA) has been computed based on percent of sales to customer.

Requesting member

Walmart, Inc.

Forest risk commodity

Timber products

Form of commodity

Cellulose-based textile fiber

Other, please specify



Paper-based pulp

Third-party certification scheme

PEFC Chain of Custody

Total volume of commodity sold to member

6,382

Metric

Metric tons

What % of the volume reported in column 5 is certified?

31-40%

Comment

Clorox uses wood-based fiber in some of our products — namely Clorox® disinfecting wipes, Green Works® compostable cleaning wipes, Burt's Bees® towelettes and Burt's Bees® baby wipes. We do not purchase this fiber directly and some suppliers do not provide the chain of custody for the certification for tree-based fiber used in our wipes. However, we have contacted our suppliers and approximately 97% or 6,190 metric tons of tree-based material in our sold to Walmart wipes is "certifiable", being from certified sources (60% FSC and 37% PEFC or SFI). We are reporting the PEFC certified supplier, which provides copies of the chain of custody. The volume of the commodity sold to Walmart USA (including Sam's Club USA) has been computed based on percent of sales to customer.

Requesting member

Walmart, Inc.

Forest risk commodity

Timber products

Form of commodity

Primary packaging
Secondary packaging
Tertiary packaging

Third-party certification scheme

SFI Chain of Custody

Total volume of commodity sold to member

32,882

Metric

Metric tons

What % of the volume reported in column 5 is certified?

10-20%

Comment

Our total packaging fiber volumes sold to Walmart USA/Sam's Club USA is approximately 32,882 metric tons. Of that volume, approximately 46% is certified virgin fiber with 53% of the volume being recycled fiber and 1% not certified or recycled. Of our certified packaging fiber volume reported, approximately 35% is SFI certified, 62% FSC certified and 1% PEFC certified (multiply by 0.46 to calculate the total certified with the remaining being recycled content). The volume of the commodity sold to Walmart USA (including Sam's Club USA) has been computed based on percent of sales to customer.

Requesting member

Walmart, Inc.

Forest risk commodity

Timber products

Form of commodity

Primary packaging
Secondary packaging
Tertiary packaging

Third-party certification scheme

PEFC Chain of Custody

Total volume of commodity sold to member

32,882

Metric

Metric tons

What % of the volume reported in column 5 is certified?

<10%

Comment

Our total packaging fiber volumes sold to Walmart USA/Sam's Club USA is approximately 32,882 metric tons. Of that volume, approximately 46% is certified virgin fiber with 53% of the volume being recycled fiber and 1% not certified or recycled. Of our certified packaging fiber volume reported, approximately 35% is SFI certified, 62% FSC certified and 1% PEFC certified (multiply by 0.46 to calculate the total certified with the remaining being recycled content). The volume of the commodity sold to Walmart USA (including Sam's Club USA) has been computed based on percent of sales to customer.

Requesting member

Walmart, Inc.

Forest risk commodity



Palm oil

Form of commodity

Palm oil derivatives
Palm kernel oil derivatives

Third-party certification scheme

RSPO Mass Balance

Total volume of commodity sold to member

446

Metric

Metric tons

What % of the volume reported in column 5 is certified?

41-50%

Comment

Clorox's sourcing of palm oil ingredients is limited to 99% derivatives of palm and palm kernel oil. Typically present in very small percentages as sub-components of surfactants, fatty alcohols, emulsifiers or fragrances, palm oil derivatives are used in some of our cleaning, food, and natural personal care products. Currently over 42% of palm oil derivatives and palm kernel oil derivative volumes are RSPO certified. The volume of the commodity sold to Walmart USA (including Sam's Club USA) has been computed based on percent of sales to customer.

SF2.1

(SF2.1) Please propose any mutually beneficial forests-related projects you could collaborate on with specific CDP supply chain members.

SF2.2

(SF2.2) Have requests or initiatives by CDP supply chain members prompted your organization to take organizational-level action to reduce or remove deforestation/forest degradation from your operations or your supply chain?

No

SF3.1

(SF3.1) For your disclosed commodity(ies), do you estimate the GHG emission reductions and/or removals from land use and land use change that have occurred in your direct operations and/or supply chain?

Timber products

Estimate GHG emissions and removals from land use and land use change



No

Please explain

We do not estimate GHG emission reduction removals from land use or land use changes.

Palm oil

Estimate GHG emissions and removals from land use and land use change

No

Please explain

We do not estimate GHG emission reduction removals from land use or land use changes.

Submit your response

In which language are you submitting your response?

English

Please confirm how your response should be handled by CDP

	I am submitting to	Public or Non-Public Submission	Are you ready to submit the additional Supply Chain questions?
I am submitting my response	Investors Customers	Public	Yes, I will submit the Supply Chain questions now

Please confirm below

I have read and accept the applicable Terms