



The Clorox Company of Canada, Ltd.

Brita Canada Corporation

Brita Canada Holdings Corporation

Brita LP

The Brita Products Company

The Glad Products Company

Annual Report Pursuant to the  
Fighting Against Forced Labour and  
Child Labour in Supply Chains Act

Year ended 30 June 2023

## I. Introduction

The Clorox Company (referred to as “Clorox” or “we”) has put in place various programs to manage the risks of forced or child labour throughout the Clorox operations and supply chain. This is a joint report being made in accordance with the Fighting Against Forced Labour and Child Labour in Supply Chains Act (the “Act”) by and for the following entities:

- The Clorox Company of Canada, Ltd. (“Clorox Canada”);
- Brita Canada Corporation (“Brita Canada”);
- Brita Canada Holdings Corporation (“Brita Canada Holdings”);
- Brita LP;
- The Brita Products Company (“Brita Products”); and
- The Glad Products Company (“Glad Products”).

The reporting entities are collectively referred to in this report as “the Companies.” Brita Canada, Brita Canada Holdings, and Brita LP are collectively referred to in this report as “the Brita entities.” This report refers to the Companies’ 2023 fiscal years, which ended on June 30, 2023. The Companies plan to continue to report on an annual basis.

As described further in this report, to address risks of forced and child labour in the operations and the supply chains of the Companies, Clorox has put in place several measures, including, but not limited to: (1) general commercial and supply chain activities; (2) conducting internal assessments and encouraging third parties to conduct assessments; (3) maintaining a Code of Conduct and Business Partner Code of Conduct and other policies and procedures, (4) identifying, mapping, and evaluating certain supply chain activities and partners through the Responsible Sourcing programs, which includes engaging with business partners on the issue of forced or child labour; (5) incorporating contractual terms that address business practices of third-party business partners; (6) maintaining a confidential hotline for the reporting of illegal or unethical behavior; (7) conducting training for all Clorox employees regarding the Clorox Code, as well as targeted training regarding forced and child labour for certain supply chain team members; and (8) engaging on the issue with lawmakers, non-governmental organizations, and other stakeholders through Clorox’s involvement with multi-stakeholder engagement organizations.

## II. Clorox Structure, Activities and Supply Chains

### A. Structure and Activities

Clorox Canada is a corporation incorporated under the Canada Business Corporation Act, with its headquarters in Ontario, Canada. Clorox Canada has a manufacturing facility and a corporate office in Ontario, and its principal activities include the

manufacture, sale, importation and distribution of a range of well-known branded consumer and professional goods to customers, that are sourced from Clorox manufacturing facilities or external manufacturers both domestically and overseas.

Brita Canada is a corporation incorporated under the Nova Scotia Companies Act, with its headquarters in Ontario. It is a subsidiary of Brita Canada Holdings and Brita Products. Brita Canada has a manufacturing facility in Ontario, and its principal activities include the manufacture, sale, importation and distribution of water filtration products in Canada, that are sourced from a Clorox manufacturing facility in Canada or external manufacturers both domestically and overseas.

Brita Canada Holdings is a corporation incorporated under the Nova Scotia Companies Act, with its headquarters in Ontario. Brita Canada Holdings is a holding company and the controlling shareholder of Brita Canada. Brita Canada Holdings is a wholly-owned subsidiary of Brita LP. Brita Canada Holdings does not engage in any operational activities.

Brita LP is a limited partnership organized under the Limited Partnership Act (Ontario), with its headquarters in Switzerland. Brita LP is the controlling shareholder of Brita Canada Holdings and holds an indirect controlling shareholding of Brita Canada. It does not engage in any operational activities.

Brita Products is a corporation incorporated under the laws of the state of Delaware, United States, with its headquarters in the state of California, United States. Brita Products is the limited partner and majority shareholder of Brita LP. Its principal activities include the importation, sale and distribution of Brita water filtration products in the United States.

Glad Products is a corporation incorporated under the laws of the state of Delaware, United States, with its headquarters in the state of California, United States. Glad Products is the controlling shareholder of Clorox Canada. Its principal activities include the importation, sale and distribution of Glad-branded bags and wraps in the United States.

Clorox is a leading multinational manufacturer and marketer of consumer and professional products with about 8,700 employees worldwide as of June 30, 2023 and fiscal year 2023 net sales of \$7.4 billion. Clorox's products are sold primarily through mass retailers; grocery outlets; warehouse clubs; dollar stores; home hardware centers; drug, pet and military stores; third-party and owned e-commerce channels; and distributors.

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 grilling products, Hidden Valley dressings, dips, seasonings, and sauces, Brita water-filtration products, Burt's Bees natural personal care products, and RenewLife, Rainbow Light, Natural Vitality, and NeoCell vitamins, minerals and supplements. Clorox also markets industry-leading products and technologies for professional customers, including those sold under the CloroxPro and Clorox Healthcare brand names.

Clorox is a signatory to the United Nations Global Compact (the "UNGC") and the Ellen MacArthur Foundation's New Plastics Economy Global Commitment. Clorox is committed to ensuring that its manufacturing facilities around the world comply with, and often exceed, what is required by applicable laws. Clorox is clear about its expectations in the areas of human rights and labour, anti-corruption, the environment, respectful treatment and equal opportunity, health and safety as well as business conduct and ethics, which are consistent with the Ten Principles of the UNGC and outlined in the Clorox Human Rights Commitment that is publicly disclosed on Clorox's website.

## **B. Supply Chain**

Clorox Canada and Brita Canada are Clorox's principal operating entities in Canada. They purchase raw materials, processed ingredients, packaging and contract manufactured goods, from numerous domestic and international suppliers and external manufacturers. Although the majority of the Companies' products and inputs are manufactured at a Clorox facility or external manufacturers based in the United States and Canada, certain of the Companies' products or inputs are made under external manufacturing arrangements with companies located in, operating in, or sourcing from regions with an elevated risk of forced and child labour, such as Latin America and Asia.

## **III. Risk Assessment Process**

Clorox uses several methods to assess its enterprise risks, including risks associated with regulatory and compliance issues. As part of its Enterprise Risk Management ("ERM") program, Clorox maintains a process designed to assess, identify and manage material risks to the business and operations of Clorox and its subsidiaries (including the Companies). The ERM program conducts an Enterprise Risk Assessment at least annually, to identify key enterprise risks. Additionally, Clorox analyses regulatory and compliance risks through a variety of other methods, including annual questionnaires, periodic internal and external reviews, and real-time evaluation of emerging issues.

#### **IV. Company policies and due diligence processes in relation to forced labour and child labour**

##### **A. Clorox Code of Conduct**

Clorox has a Code of Conduct (the “Clorox Code”) that describes Clorox’s expectation that Clorox, the Companies, and all employees recognize and promote human rights on a global basis. Grounded in the UNGC and International Labor Organization Declaration on Fundamental Principles and Rights at Work, the Clorox Code states that Clorox does not condone the exploitation, physical punishment, abuse, trafficking or involuntary service of children and others and prohibits the use of forced or illegal labour. The Clorox Code is also publicly available on Clorox’s website.

##### **B. Clorox Business Partner Code of Conduct**

Clorox also has a Business Partner Code of Conduct (“Business Partner Code”) available on its website, provided in bilateral discussions, and related contractual terms that addresses business practices of third-party business partners, including suppliers, distributors, consultants, joint ventures, licensees, and other business partners (“Business Partners”). The Business Partner Code contains specific provisions addressing the issues of human rights and labour. Among other guidance, the Business Partner Code makes clear that Business Partners must evaluate and address risks of forced and child labour and not produce goods or services using child, forced, bonded, indentured, involuntary convict or compulsory labour, and comply with applicable laws.

Clorox expects Business Partners to adhere to the principles of the Business Partner Code and strives to ensure its strategic Business Partners are in compliance with its principles through agreement or certification (either in a contract and/or a Business Partner Code self-certification form) and/or by assessing their public commitments, codes and policies. Business Partners are expected to designate management staff to monitor their factories, production facilities, business operations and their compliance with the Business Partner Code. Clorox’s supply agreements also contain representations that Business Partners are in compliance with all applicable federal, state and/or provincial, regional, municipal, and local laws, codes, regulations, rules, ordinances, decrees, permits, registrations and orders, which include laws addressing child labour, human trafficking, and slavery.

In addition, Clorox and/or designated third parties may visit and assess Business Partners to ensure compliance with the Business Partner Code, including but not limited to compliance with the prohibition on child labour, slavery, and human trafficking. The Business Partner Code also requires that materials incorporated into Clorox’s products

comply with the laws regarding child labour, slavery, and human trafficking of the country or countries in which they are doing business.

## **V. Responsible Sourcing Programs**

As part of its Responsible Sourcing programs, Clorox evaluates (and may use third parties to evaluate) its supply chains, as well as those of its subsidiaries, including the Companies—for risk, including those related to forced or child labour. For example, in Canada and other markets, third-party manufacturers or suppliers are identified in consultation with legal, procurement, and other applicable controls teams. Such partners undergo diligence checks, training, and/or a review of contractual commitments as necessary and appropriate. In addition to information monitoring, Clorox supports its Business Partner Code with site visits, as appropriate, self-assessments, and third-party audits.

Clorox participates in and supports the establishment of multistakeholder engagement organizations to drive collaboration to address risks of forced and child labour, such as AIM-Progress, Global Shea Alliance, Responsible Mica Initiative, Earthworm Foundation, Action for Sustainable Derivatives and Sustainable Coconut Partnership. Clorox is also a member of Sedex through which select Business Partners are engaged to complete the Sedex Self-Assessment Questionnaires, on-site Sedex Members Ethical Trade Audits and Sedex Virtual Assessments. Clorox supports mutual recognition platforms for audits to encourage its Business Partners to focus on remediation and improvements. In the event concerns arise, Clorox will investigate the matter and take appropriate actions to address the issue.

Clorox takes a Business Partner's ability to meet or exceed these standards into account when making procurement decisions and deciding whether to maintain a business relationship. When suppliers are unable to demonstrate that they have appropriate risk management controls in place, Clorox may take further action, such as engaging supplier senior management, implementing a remediation plan or suspending services.

## **VI. Identification and remediation of forced labour or child labour issues**

The Companies may receive reports of forced or child labour through:

- Clorox's Compliance Hotline;
- Business Partner site visits, self-assessments, and third-party audits conducted by Clorox;
- Non-governmental organizations; and
- Media reports.

Clorox has an established incident management and escalation process to facilitate its effective and timely response on behalf of itself and its subsidiaries, including the Companies.<sup>1</sup> Business Partners are also expected to designate management staff to monitor their factories, production facilities, business operations and their compliance with the Business Partner Code.

The Compliance Hotline allows individuals to report suspected illegal or unethical behavior, including suspected issues of child labour, slavery or human trafficking in either Clorox's own business or its supply chains. Contact details are provided in the Clorox Code and Business Partner Code, including international toll-free hotline numbers for numerous jurisdictions, including Canada. Clorox encourages individuals to report potential issues to assist in promptly identifying any potential risks in its supply chain. Clorox also offers individuals several channels to report potential issues, including by reporting to their manager, Human Resources, Clorox Legal Services or anonymously through the Compliance Hotline. Clorox employees who do not act promptly to report noncompliance matters may be subject to disciplinary action. As stated in the Clorox Code and the Business Partner Code, Clorox strictly prohibits retaliation against anyone who in good faith reports suspected misconduct. All anonymized Compliance Hotline reports are made available to senior leadership, including Clorox's board of directors. Clorox investigates all Compliance Hotline reports, including reports of potential issues, and addresses remediation, as appropriate.

## **VII. Training regarding forced labour and child labour**

### **A. Code of Conduct Training**

Clorox proactively communicates the Clorox Code and compliance program to all employees (including those of the Companies) through various methods, including but not limited to providing employees with regular training regarding compliance with the Clorox Code (including segments on forced and child labour) together with information on Clorox's corporate intranet, posters, flyers and periodic awareness campaigns. Managers are encouraged to have regular discussions with those under their supervision about the Clorox Code and Clorox policies and the importance of compliance.

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<sup>1</sup> To date, the Companies are not aware of any identified or reported instances of loss of income to vulnerable families that resulted from measures taken to eliminate the use of forced labour or child labour in our activities and supply chains.

## B. Targeted supply chain training

Clorox has conducted targeted training for its supply chain leadership, internal team members with direct responsibility for supply chain management and select Business Partners to identify and address risks of child labour, slavery, and trafficking in its supply chain. This targeted training includes supply chain and procurement team members who are responsible for sourcing activities for the Companies, as well as the larger Clorox organization.

## VIII. Ongoing program assessment and broader engagement on the issue

Clorox continues to monitor the effectiveness of its programs to manage the risks of forced and child labour throughout its supply chain, including the supply chain that supports the Companies' operations.

Clorox is committed to continuous improvement and will continue monitoring for further legislative or regulatory development and reviewing and enhancing its programs and policies to account for applicable laws or business circumstances impacting the Companies. Clorox will also continue focusing on the engagement of Business Partners, and monitoring complaints made to applicable regulatory organizations as well as through the Clorox Compliance Hotline. Finally, Clorox continues to engage on the issue with lawmakers, non-governmental organizations, and other stakeholders through Clorox's involvement with AIM-Progress.

## Approval and Attestation

This report is approved and attested, as required under subsection 11(4)(b) and subsection 11(5) of the Act.

/s/ Iké Adeyemi

**Iké Adeyemi**

Director

The Glad Products Company

The Clorox Company of Canada, Ltd.

The Brita Products Company

/s/ George Berthoud

**George Berthoud**

Managing Partner

Clorox (Switzerland) S.a.r.l., as managing

partner of Brita GP, as general partner

of Brita LP

On behalf of the Brita Entities