

# Modern Slavery, Forced Labor & Supply Chain Transparency Statement

Year ended 30 June 2024

## Introduction

The Clorox Company (together referred to as "Clorox" or "we") has put in place various programs to manage the risks of forced labor, child labor, modern slavery and human trafficking throughout its operations and supply chain, including its subsidiaries.

This statement applies to all of Clorox's operations and is being made in accordance with applicable law, including the Australian Modern Slavery Act 2018, California Transparency in Supply Chains Act, the Canadian Fighting Against Forced Labour and Child Labour in Supply Chains Act, and the UK Modern Slavery Act 2015. This statement has been approved by the board of directors and signed by at least one director of the following entities (collectively, the "companies"), with respect to the operations and supply chains of the specified entity in the respective countries listed below:

- **Australia:** Clorox Holdings Pty Limited; and Clorox Australia Pty Limited ("Clorox Australia").
- **Canada:** 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 together with Brita Canada, Brita Canada Holdings and Brita LP, the "Brita Entities"); and The Glad Products Company ("Glad Products").
- **United Kingdom:** The Clorox International Company; and Cbee (Europe) Limited.

This report refers to each company's fiscal year 2024, which ended on June 30, 2024.

## Clorox Business

The Clorox Company is a leading multinational manufacturer and marketer of consumer and professional products with fiscal year 2024 net sales of \$7.1 billion and about 8,000 employees worldwide as of June 30, 2024. Clorox has operations in approximately 25 countries or territories and sells its products in more than 100 markets, 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, cleaning and disinfecting

products, Pine-Sol® and Tilex® cleaners, Liquid-Plumr® clog removers, Poett® home care products, Glad® bags and wraps, Fresh Step® and Ever Clean® cat litter, Kingsford grilling products, Hidden Valley® dressings, dips, seasonings, and sauces, Brita® water-filtration products, and Burt's Bees® natural personal care products. Clorox also marketed Natural Vitality®, RenewLife®, NeoCell® and Rainbow Light® vitamins, minerals and supplements in fiscal year 2024; these brands were sold as part of the divestiture of the company's Better Health Vitamins Minerals and Supplements business in September 2024. Clorox also markets industry-leading products and technologies for professional customers, including those sold under the CloroxPro® and Clorox Healthcare® brand names. About 80% of Clorox's sales are generated from brands that hold the No. 1 or No. 2 market share positions in their categories. The company was founded in Oakland, California in 1913.

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. The company is clear about its expectations in the areas of human rights and labor, 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 the United Nations Guiding Principles on Business and Human Rights, as outlined in the Clorox Human Rights Commitment that is publicly disclosed on our website.

As described further in this report, to address, prevent and reduce risks of forced and child labor in each company's operations and supply chains, 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 ("Code") and a Business Partner Code of Conduct ("Business Partner Code") and other policies and procedures, (4) identifying, mapping and evaluating certain supply chain activities and business partners through various programs, including engaging with business partners on the issue of forced/child labor, modern slavery and human trafficking, (5) incorporating contractual terms that address the business practices of third-party business partners, (6) maintaining a confidential hotline for reporting of illegal or unethical behavior, (7) conducting training for Clorox employees regarding the Code of Conduct, as well as targeted training regarding forced/child labor, modern slavery and human trafficking for certain 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.

## **Clorox Structure, Activities and Supply Chains**

### *Structure and Activities*

#### **Australia**

Clorox Holdings Pty Limited is the local holding company in Australia within the Clorox group, and Clorox Australia is the local operating company in Australia within the Clorox group. These companies are registered pursuant to local requirements. Clorox Holdings Pty Limited is a holding company that holds the assets of Clorox Australia. Clorox Australia's principal activity includes the importation, distribution and marketing of a range of well-known branded consumer and professional goods to customers, as sourced from Clorox manufacturing facilities or overseas or local business partners.

#### **Canada**

Clorox Canada is a corporation organized 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 in Canada and internationally.

Brita Canada and Brita Canada Holdings are corporations organized under the Nova Scotia Companies Act, with headquarters in Ontario, Canada. Brita Canada is a subsidiary of Brita Products and Brita Canada Holdings, which is the controlling shareholder of and the holding company that holds the assets of Brita Canada. 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 in Canada and overseas. Brita Canada Holdings is a wholly-owned subsidiary of Brita LP and does not engage in any operational activities.

Brita LP is a limited partnership organized under the Limited Partnership Act (Ontario), with its headquarters in Ontario, Canada. 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 and Glad Products are corporations organized under the laws of the state of Delaware, United States, with headquarters in the state of California, United States. Brita Products is the limited partner and majority shareholder of Brita LP. Glad Products is the controlling shareholder of Clorox Canada. Brita Products' and Glad Products' principal activities include the importation, sale and distribution of Brita water filtration products and Glad-branded bags and wraps, respectively, in the United States.

### **United Kingdom**

Cbee (Europe) Limited is the local operating company in the United Kingdom (the "UK") within the Clorox group and is registered pursuant to local requirements. Cbee (Europe) Limited's principal activities include the importation, distribution and marketing of a range of well-known branded consumer goods to customers.

### ***Clorox Supply Chain***

Clorox purchases raw materials, packaging and contract manufactured goods from numerous suppliers in the United States, Asia, Canada, the UK, Europe, Australia, New Zealand, Mexico, South America, and the Middle East, some of which provide sole-sourced or single-sourced goods. Clorox generally utilizes supply contracts to help ensure availability and a number of forward-purchase contracts to help reduce the volatility supply risk and of the pricing of goods and services needed in its operations. Clorox licensing partners also distribute products in various geographies, such as the United States, Canada, Europe and Australia.

### **Australia**

In Australia, Clorox Australia imports and exports products in wholly manufactured and packed form. Employees of Clorox Australia receive training regarding the company's policies and procedures, including regarding human rights issues in our operations. Clorox Australia also engages third party business partners for certain activities, including leased office premises in New South Wales, Australia, and outsourced services in the areas of facilities management and cleaning, and warehousing and logistics services, which may have an elevated risk of modern slavery issues depending on the labor arrangements (i.e., temporary labor), location (i.e., South East Asia), and other circumstances. In addition, some of our products are also made under co-packing arrangements with companies located in, operating in, or sourcing from countries that historically have an elevated risk of modern slavery, such as those

countries listed on the Walk Free Foundation's Global Slavery Index ("Global Slavery Index").

### Canada

In Canada, Clorox Canada and Brita Canada are Clorox's principal operating entities. Raw materials, packaging and contract manufactured goods are purchased from numerous Canadian and international suppliers and external manufacturers.

Although the majority of the Canadian companies' products and inputs are manufactured at a Clorox facility or external manufacturers based in the United States and Canada, certain of the Canadian companies' products or inputs are made under external manufacturing arrangements with companies located in, operating in, or sourcing from regions that historically have an elevated risk of forced and child labor, such as Latin America and Asia, according to the Global Slavery Index.

### United Kingdom

In the UK, Cbee (Europe) Limited imports finished goods from Clorox manufacturing facilities or external manufacturers internationally, including from companies located in, operating in, or sourcing from regions that could potentially present an elevated risk of modern slavery according to the Global Slavery Index, such as Turkey, or local business partners.

### **Risk Assessment Process**

Clorox uses several methods to assess its enterprise risks, including risks associated with regulatory and compliance issues, including forced/child labor, modern slavery and human trafficking. 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. 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.

### **Company policies and due diligence processes**

Clorox sets certain expectations and standards regarding forced labor, child labor, modern slavery and human trafficking and works with applicable business partners of Clorox and its subsidiaries to assess their operations. This may include periodic

evaluations of certain business partners, discussions and site visits with certain suppliers, and seeking third-party certified ingredients, where applicable and feasible. Clorox's compliance program includes its human rights commitment and approach, the Clorox Code of Conduct (the "Clorox Code") and associated training, the Business Partner Code and engagement with suppliers to promote compliance with these expectations, the Clorox Compliance Hotline and the Responsible Sourcing program.

### *Clorox Code of Conduct*

The Clorox Code describes Clorox's expectation that Clorox, its subsidiaries, and 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 labor. The Clorox Code is publicly available on Clorox's website.

### *Clorox Business Partner Code of Conduct*

Clorox also has a Business Partner Code of Conduct 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"). This code applies to Business Partners of Clorox and its subsidiaries. The Business Partner Code contains specific provisions addressing the issues of human rights and labor. The Business Partner Code also states that Business Partners must evaluate and address risks of and not produce goods or services using child, forced, bonded, indentured, involuntary convict or compulsory labor, 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 laws and regulations, which include laws addressing forced/child labor, human trafficking, and slavery.

In addition, Clorox and/or designated third parties, from time to time, visit and assess Business Partners to ensure compliance with the Business Partner Code, including but not limited to compliance with the prohibition on child labor, slavery, and human trafficking. The Business Partner Code also requires that materials incorporated into Clorox's products comply with the laws regarding forced/child labor, modern slavery, and human trafficking of the country or countries in which they are doing business.

### *Responsible Sourcing Program*

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

Clorox has helped establish and participates in multi-stakeholder engagement organizations to drive collaboration to address risks of forced and child labor, such as AIM-Progress, an international organization focused on identifying emerging issues and ensuring respect for human rights in supply chains, 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 and on-site Sedex Members Ethical Trade Audits. 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 considers a Business Partner's ability to meet or exceed these standards when making procurement decisions, including 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 procurement of goods and/or services.

## Identification and remediation of modern slavery, forced labor, child labor or human trafficking issues

The companies may receive reports of forced or child labor 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 an effective and timely response on behalf of itself and its subsidiaries. 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.

Clorox operates a confidential hotline ("Compliance Hotline") administered by a third party that, where permissible under local laws, is available to all employees, directors and contractors, as well as Business Partners and their employees or subcontractors.

The Compliance Hotline allows individuals to report suspected illegal or unethical behavior, including suspected issues of child labor, 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 the United Kingdom, Canada and Australia. 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.<sup>1</sup>

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<sup>1</sup> Clorox Canada, the Brita Entities, and Glad Products have not identified any instances of forced or child labor in their activities or supply chain in fiscal year 2024 and remediation measures have therefore not been required or taken.



## Training regarding forced labor, child labor, modern slavery and human trafficking

### *Clorox Code of Conduct Training*

Clorox proactively communicates the Clorox Code and compliance program to employees of Clorox and its subsidiaries 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 labor) 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.

### *Targeted supply chain training and increased awareness*

Clorox has conducted targeted training and increased awareness 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 labor, slavery, and trafficking in its supply chain. Targeted training includes supply chain and procurement team members who are responsible for sourcing activities for the Clorox organization.

### **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 labor, modern slavery and human trafficking throughout its supply chain, including the supply chain that supports the companies' operations.

Clorox is also committed to continuous improvement and will continue monitoring for further legislative or regulatory development and review and enhance 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, Responsible Mica Initiative, Global Shea Alliance, Sustainable Coconut Partnership and other multistakeholder platforms to promote respect for human rights.

## Approvals and signatures

### *Australia*

Signed following approval by each board of directors.



**Felipe Eduardo Toledo Acuña**, Director  
Clorox Australia Pty Ltd.  
Clorox Holdings Pty Limited

### *Canada*

This report is approved and attested, as a joint report, pursuant to subsection 11(4)(b)(i) as it relates to The Clorox Company of Canada, Ltd., Brita LP, the Brita Products Company, and The Glad Products Company; pursuant to subsection 11(4)(b)(ii) as it relates to Brita Canada Corporation and Brita Canada Holdings Corporation; and pursuant to and subsection 11(5) of The Fighting Against Forced Labour and Child Labour in Supply Chains Act.



**Angela Hilt**, Director  
The Brita Products Company  
The Glad Products Company  
*I have authority to bind the entities listed above.*



**Christopher Schultz**, Manager, Brita GP LLC  
Brita LP (on behalf of The Brita Entities)  
*I have authority to bind the entities listed above.*



**Jinho Joo**, Vice President and Assistant Secretary,  
The Glad Products Company, as the sole shareholder  
of The Clorox Company of Canada, Ltd.  
*I have authority to bind the entity listed above.*

### *United Kingdom*

Signed following approval by each board of directors.



**Giles Malone**, Director  
Cbee (Europe) Limited



**Angela Hilt**, Director  
The Clorox International Company