Particulars

About Your Organisation

Jour Four Organisation
1.1 Name of your organization
The Clorox Company
1.2 What is/are the primary activity(ies) or product(s) of your organization?
☐ Oil Palm Growers
☐ Palm Oil Processors and/or Traders
☑ Consumer Goods Manufacturers
Retailers
☐ Banks and Investors
☐ Social or Development Organisations (Non Governmental Organisations)
☐ Environmental or Nature Conservation Organisations (Non Governmental Organisations)
☐ Affiliate Members
☐ Supply Chain Associate
1.3 Membership number
4-0649-15-000-00
1.4 Membership category
Ordinary
1.5 Membership sector
Consumer Goods Manufacturers

Consumer Goods Manufacturers

Operational Profile

1.1 Please state what your main activity(ies) is/are within manufacturing
End-product manufacturer
● Food Goods
Home & Personal Care Goods
Own-brand-Manufacturer
Operations and Certification Progress
2.1 Please include details of all operations using palm oil, majority owned and/or managed by the member and/or related entities
2.1.1 In which markets where you operate, do you manufacture goods with palm oil and oil palm products?
■ Applies Globally
2.1.2 In which markets where you operate, do you calculate how much palm oil and oil palm product there is in the goods you manufacture?
■ Applies Globally
2.2 Volumes of palm oil and oil palm products (Tonnes)
2.2.1 Total volume of Crude and Refined Palm Oil used in the year (Tonnes)
1
2.2.2 Total volume of Crude and Refined Palm Kernel Oil used in the year (Tonnes)
-
2.2.3 Total volume of Palm Kernel Expeller used in the year (Tonnes)
2.2.4 Total volume of other palm-based Derivatives and Fractions used in the year (Tonnes)
2,318
2.2.5 Total volume of all palm oil and oil palm products used in the year (Tonnes)

2,319

2.3 Volume of palm oil and oil palm products used in the year in your own brand products that are RSPO-certified (in tonnes):

Description	Crude and Refined Palm Oil	Crude and Refined Palm Kernel Oil	Palm Kernel Expeller	Other palm-based derivatives and fractions
2.3.1 Book and Claim from Mill / Crusher*	-	-	-	18.00
2.3.2 Book and Claim from Independent Smallholder*	-	-	-	45.00
2.3.3 Mass Balance	1.00	-	-	-
2.3.4 Segregated	-	-	-	-
2.3.5 Identity Preserved	-	-	-	-
2.3.6 Total volume	1.00	-	-	63.00

2.4 Volume of RSPO certified sustainable palm oil and oil palm products sold to other RSPO certified companies $\mathbf{0}$ (in tonnes)

Description	Crude and Refined Palm Oil	Crude and Refined Palm Kernel Oil	Palm Kernel Expeller	Other palm-based derivatives and fractions
2.4.1 Book and Claim from Mill / Crusher	· -	-	-	-
2.4.2 Book and Claim from Independent Smallholder	-	-	-	-
2.4.3 Mass Balance	-	-	-	-
2.4.4 Segregated	-	-	-	-
2.4.5 Identity Preserved	-	-	-	-
2.4.6 Total volume	-	-	-	-

2.5 What is the percentage of RSPO Certified Sustainable Palm Oil in the total palm oil used by your company in the following regions:

2.5.1 Africa	
2.5.2 Australasia	
2.5.3 China	
2.5.4 Europe (incl.Russia)	
2.5.5 India	
2.5.6 North America	3%
2.5.7 South America	
2.5.8 Indonesia	
2.5.9 Malaysia	
2.5.10 Middle East	
2.5.11 Rest of Asia	

Time-Bound Plan

3.1 Date of first supply chain certification (planned or achieved)

2025

Comment:

Clorox is working with our current suppliers to ensure the palm oil and derivative ingredients used in our products are from responsible sources. In a public goal that we would source all palm oil ingredients from Roundtable on Sustainable Palm Oil-certified sustainable palm oil or through Gree offsets by the year 2020. In 2015, we created a more robust and comprehensive Palm Oil Responsible Sourcing Commitment that replaces the goal 2012. This updated commitment expanded the scope of our palm oil ingredient sourcing practices to address three key areas: 1) deforestation and protection; 2) business ethics and human rights; and 3) traceability. Per this commitment, by the end of 2020 we'll expect suppliers to secure third verification to demonstrate compliance with the following sourcing practices throughout all tiers of their supply chain:

Deforestation & Peatland Protection

In 2015, we began communicating requirements to our palm oil ingredient suppliers to ensure they respect the principles of no deforestation and protection. By the end of 2020, we'll expect suppliers to secure third-party verification to demonstrate compliance with the following sourcing pract throughout all tiers of their supply chain:

- Comply with existing RSPO Principles and Criteria or other equivalent standards.
- Do not contribute to deforestation by conserving and protecting primary and secondary forests, High Carbon Stock[1] and High Conservation Valacross all of their landholdings.
- Commit to no new development on peatlands, regardless of depth.
- Use best management practices[3] for existing palm oil plantations on peat soils.
- Prohibit the use of fire for preparation or clearing of land areas.
- Comply with existing RSPO Principles and Criteria or other equivalent standards.

Business Ethics & Human Rights

Clorox holds suppliers at all tiers within its palm oil supply chain accountable to the following principles listed in our Business Partner Code of Con

- Comply with all applicable laws and regulations in the countries of operation.
- Prohibit child labor, forced and/or bonded labor.
- Compensate workers in accordance with all applicable laws and regulations—including those pertaining to minimum wage, overtime, maximum benefits and leave.
- Prohibit discrimination, harassment and inhumane treatment in employment or occupation.
- Provide a safe and healthy work environment, including clean and safe housing when provided.
- Respect workers' rights to freedom of association and to collective bargaining.
- Prevent and prohibit corruption, including extortion and bribery.
- Use ethical recruitment practices, in which recruitment processes are documented and transparent, and costs charged to the workers are transp

justified and legal.

- Identify and implement efforts to reduce environmental footprints.
- Provide safe work procedures and appropriate personal protective equipment to prevent chemical exposure, and, where possible, eliminate worker exposure to harmful chemical, biological and physical agents.

In addition to the principles within our Code of Conduct, we require these suppliers to:

- Respect land tenure rights and the rights of indigenous and local communities to give or withhold their Free, Prior and Informed Consent (FPIC) to operations on lands to which they hold legal, communal or customary rights.[4]
- Have a credible and accessible grievance mechanism that allows for stakeholders to report concerns without fear of recrimination or dismissal.[5] New or existing conflicts, including ones resulting from a lack of FPIC, should be managed and resolved through a transparent, balanced and accessible dispute resolution process.
- Track and reduce GHG emissions at plantations and mills per planted hectare and per ton of crude palm oil and palm kernel oil produced.
- Facilitate the inclusion of smallholders into our supply chain, and support them through the process of achieving compliance.

Traceability

We're currently mapping various suppliers in our supply chain and are further investigating various approaches and tools we can deploy to help us assess risk and drive positive change. Due to the complexity of the palm derivative supply chain, the process of achieving traceability involves a number of companies at many tiers.

We will partner with our suppliers and NGOs to enable third-party verification of our suppliers' supply chain traceability efforts as well as to verify that sourcing practices prevent deforestation and protect peatlands.

Clorox sources a low volume of palm- oil-derived ingredients from various suppliers, with fluctuations from year to year in amount and source based on our business needs. As a result, we review our purchases annually and determine our priority suppliers. Working with our current priority suppliers, our goal is to map the supply chain back to the mill level by the end of 2018. Traceability is far more challenging for palm oil derivatives than palm oil; therefore, this timeline could change as we learn more and gain a better understanding of the progress of our suppliers.

Implementation

Clorox's Palm Oil Responsible Sourcing Commitment took effect August 2015. As part of that commitment, we developed an initial time-bound action plan to work with our supply chain and third-party stakeholders to achieve and verify company-wide compliance. Another time-bound action plan was published in 2018. Progress reports are made available twice a year.

We'll continue to assess, monitor and verify our direct suppliers' sourcing practices and identify areas for improvement. In the event of non-compliance with our requirements, we will work with suppliers to create a corrective action plan with time-bound commitments. Suppliers failing to reasonably meet our remediation requirements may be subject to non-renewal or termination of contracts. In addition, the commitment criteria will be included in the Clorox supplier selection process going forward.

Our focus has been on developing a comprehensive approach to traceability, transformation and verification of upstream supply chain practices for palm oil, palm kernel oil and especially palm derivatives since they constitute the vast majority of our palm-based ingredient usage. We have started the process of developing our strategy for 2025 and will further evaluate our commitment and our means of verification in our supply chain.

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- [3] Best management practices covered by the "RSPO Manual on Best Management Practices (BMPs) for existing oil palm cultivation on peat."
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- [5] Suppliers should follow the guidance regarding grievance mechanisms from the UN Guiding Principles on Business and Human Rights.

3.2 Date expected to/or started to use any RSPO certified sustainable palm oil and oil palm products in your own brand products

2025

If target has not been met, please explain why:

Clorox is working with our current suppliers to ensure the palm oil and derivative ingredients used in our products are from responsible sources. In a public goal that we would source all palm oil ingredients from Roundtable on Sustainable Palm Oil-certified sustainable palm oil or through Gree offsets by the year 2020. In 2015, we created a more robust and comprehensive Palm Oil Responsible Sourcing Commitment that replaces the goal 2012. This updated commitment expanded the scope of our palm oil ingredient sourcing practices to address three key areas: 1) deforestation and protection; 2) business ethics and human rights; and 3) traceability. Per this commitment, by the end of 2020 we'll expect suppliers to secure third verification to demonstrate compliance with the following sourcing practices throughout all tiers of their supply chain:

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3.4 Date expected to be using 100% RSPO certified sustainable palm oil and oil palm products from physical supply chains (Identity Pre Segregated and/or Mass Balance) in your own brand products

2025

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COARBINES ICTORISHES.
[3] Best management practices covered by the "RSPO Manual on Best Management Practices (BMPs) for existing oil palm cultivation

143²⁴⁵ Pers yr y Ground by Harry Harry Harry Harry Harry Berling of the palacing of the control of the contro as well as the UN FAO's Voluntary Guidelines on the Responsible Governance of Tenure.

[5] Suppliers should follow the guidance regarding grievance mechanisms from the UN Guiding Principles on Business and Human Rights.

3.7 Does your company have a Time-Bound Plan to only use RSPO certified palm oil and oil palm products in the goods you manufactu of other companies?

No

Trademark Related

4.1 Do you use or plan to use the RSPO Trademark on your own brand of products?

No

Please explain why

Please see additional information on our palm oil commitment and action plans:

Palm Oil Responsible Sourcing Commitment is available at

https://www.thecloroxcompany.com/corporate-responsibility/environmental-sustainability/commitments-and-progress /supply-chain/palm-oil/

Clorox Palm Oil Responsible Sourcing Action Plan through 2017 is available at https://www.thecloroxcompany.com /wp-content/uploads/clorox-palm-oil-responsible-sourcing-plan.pdf

A Progress Update on Implementation of Our Palm Oil Responsible Sourcing Commitment, March 2018 is available at https:// www.thecloroxcompany.com/wp-content/uploads/2018/03/2018-Progress-Update-on-Palm-Oil-Responsible-Sourcing-Commitment.pdf

2018 Clorox Palm Oil Responsible Sourcing Action Plan is available at https://www.thecloroxcompany.com /wp-content/uploads/2018/03/2018-Clorox-Responsible-Palm-Oil-Action-Plan_Final-1.pdf

Actions for Next Reporting Period

5.1 Outline actions that you will take in the coming year to promote the use of RSPO certified sustainable palm oil and oil palm products supply chain

Read our 2018 Clorox Palm Oil Responsible Sourcing Action Plan at https://www.thecloroxcompany.com/wp-content/uploads/2018/03/2018-Cloro ponsible-Palm-Oil-Action-Plan_Final-1.pdf

2018 Clorox Palm Oil Responsible Sourcing Action Plan

Overview

The 2018 Clorox Palm Oil Responsible Sourcing Action Plan outlines the strategy and specific milestones that will help ensure we and our supplie progress in implementing our Palm Oil Responsible Sourcing Commitment. This year, we will focus on three key steps to be carried out in coopera suppliers:

- 1. Evaluate and track ongoing supplier progress to meet our commitment.
- 2. Trace our core volumes to key milestones in the supply chain, including origin refiner and mill.
- 3. Leverage key points in the supply chain where we can influence change and support related transformation activities on the ground. Refer to the individual sections below for additional detail about each of these steps.

Note: Clorox sources a low volume of palm-oil-derived ingredients from various suppliers, with fluctuations from year to year in amount and source business needs. As a result, we review our purchases annually and determine our "priority suppliers."

During the first quarter of 2018, Clorox will review our domestic purchases of palm oil-derived ingredients to ensure we fully execute this action plated set of priority suppliers. Based on current information, priority suppliers represent more than 92 percent of the domestic volume of palm of ingredients that we purchase annually.

This year, we will continue to focus on engaging our domestic business suppliers as we complete an assessment of possible palm oil derivatives international business supply chain. Once identification and analysis is complete, Clorox expects to integrate palm oil-derived ingredients sourced international business into our future annual volume updates and supplier prioritization, with supplier engagement and traceability work undertaker Today no direct palm oil or palm kernel oil is purchased for our international operations, and the derivative volumes are small and generally acquir distribution channels.

Three Steps Toward Responsibly Sourced Palm Oil

1. Evaluate and track supplier progress to meet our commitment.

Clorox will require our priority suppliers to have company sourcing policies, procedures and/or commitments that ensure material compliance with Responsible Sourcing Commitment and the Clorox Business Partner Code of Conduct. Clorox will actively engage them on their approach and prothese principles across their operations, using third-party verification as appropriate.

Key supplier engagement milestones:

- May 2018: All domestic business suppliers informed of Clorox's sourcing commitment and expectations.
- December 2018: Deadline for priority suppliers to submit relevant policies, procedures, commitments, and/or action plans demonstrating how the comply with our palm sourcing requirements and the Clorox Business Partner Code of Conduct.
- 2. Trace our core volumes to key milestones in the supply chain, including origin refiner and mill.

Clorox will look for our priority suppliers to demonstrate continuous improvement in traceability to the origin refiner, mill and, where feasible, to pla

There are three major points in the palm oil supply chain that represent the greatest opportunities to drive transparency and transformation throug supply chain and back to origin:

- Palm oil mills, where fresh fruit bunches are initially processed after they've been harvested.
- Origin refiners, which are the first refiners in the country of production that source crude palm oil or palm kernel oil directly from mills or from agg traders and dealers.
- First importers, the companies (usually refiners/traders) that are responsible for importing palm oil from a producing country to the country of ingranufacturing (such as the United States).

Due to their close relationships with the mills and influence within their respective mill sheds, origin refiners represent the greatest opportunity in the for a company like ours to contribute to meaningful transformation work on the ground. As a result, we've identified traceability to origin refiner as to continue to report on publicly. Transparency and responsible practices at all mills supporting an origin refiner are needed to ensure the production sourced palm oil.

Key traceability milestones:

- March 2018: Summary report on 2017 traceability efforts; palm oil-derived ingredient volume update and progress report for current priority supp
- December 2018: 100 percent traceability to origin refiners for palm oil-derived ingredients from priority suppliers, with an objective for all identifie to provide transparency to all mills in their supply chains.
- December 2018: Analysis of ingredients that may be derived from palm oil purchased by Clorox for international operations.

Through these milestones, we are building on previous engagements with suppliers to improve their levels of traceability and working with an update suppliers to encourage additional traceability efforts.

further upstream. This will help ensure that our expectations and values are understood and promoted by stakeholders able to influence change o

3. Leverage key points in the supply chain where we can influence change and support related transformation activities on the ground.

Through increased traceability, transparency and engagement with our direct suppliers, Clorox will be able to communicate and encourage sourci

Clorox has been working with our implementation partner, The Forest Trust (TFT), to help achieve this goal. We're supporting Priority Areas for Transformation, a program focused on land-use planning within a highly biodiverse 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. Clorox will continue to support this work as well as identify additional opportunities and partners that will allow us to promote industrywide transformation. We will encourage our suppliers and responsible sourcing industry partners to increase their involvement in that transformation effort as well.

As a company, we recognize there are many challenges associated with the production of palm oil and its derivatives that are widespread and common throughout the industry, and it will take time to address all of them on a large scale. To ensure that progress is being made, we expect our suppliers to have time-bound action plans, including grievance mechanisms and procedures, to react to and address issues as they arise.

Other contributions to industry transformation that Clorox will encourage include participating in trainings and workshops aimed at actively addressing the palm industry's most critical and widespread challenges; improving practices in our suppliers' supply chains beyond certification and sourcing policy and/or commitments; and increasing percentages of suppliers' palm volumes covered by broad transformation plans.

Next Steps: 2018 and Beyond

Clorox will continue to explore additional strategies and opportunities to meet our commitments as we gain further insights and achieve greater engagement with our supply chain. We believe implementation will be a journey of continuous improvement and that we will be most successful through capability building as well as strategic partnerships within our supply chain and with credible external stakeholders.

Reastinsplor Nobe Discribistate in francism of 2019, when we will review our progress, update our priority suppliers and identify the next interim milestones required to achieve our Palm Oil Responsible Sourcing Commitment.

dentify the next interim milestones required to achieve our Palm Oil Responsible Sourcing Commitment. 6.1 If you have not disclosed any of the above information, please indicate the reasons why	
- Others:	
-	
Application of Principles & Criteria for all members sectors	
7.1 Related to your sourcing, do you have (a) policy/ies, that are in line with the RSPO P&C such as:	
✓ Water, land, energy and carbon footprints	
Uploaded file: Related link: https://www.thecloroxcompany.com/corporate-responsibility/environmental-sustainability/commitments-and-progress/supply	y-chair
☑ Land Use Rights	
Uploaded file: Related link: https://www.thecloroxcompany.com/corporate-responsibility/environmental-sustainability/commitments-and-progress/supply	y-chair
Ethical conduct and human rights	
Uploaded file: Related link: https://www.thecloroxcompany.com/corporate-responsibility/environmental-sustainability/commitments-and-progress/supply	y-chair
☑ Labour rights	
Uploaded file: Related link: https://www.thecloroxcompany.com/corporate-responsibility/environmental-sustainability/commitments-and-progress/supply	y-chair
✓ Stakeholder engagement	
Uploaded file: Related link: https://www.thecloroxcompany.com/corporate-responsibility/environmental-sustainability/commitments-and-progress/supply	y-chair
☐ None of the above	

7.2 What best practice guidelines or information has your organization provided in the past year to facilitate the uptake of RSPO certifies sustainable palm oil and oil palm products? What languages are these guidelines available in?

Comment:

While our commitments are not specific to CSPO, we are making significant progress toward responsibly sourcing palm oil. More information on o commitments, action plans and progress can be found on our website (links below). The following are highlights from our 2017-2018 palm oil suppengagement activities:

- 1. Evaluate and track ongoing supplier progress to meet our commitment.
- Clorox will require our priority suppliers to have company sourcing policies, procedures and/or commitments that ensure material compliance wit Palm Oil Responsible Sourcing Commitment and Business Partner Code of Conduct. Clorox will actively engage them on their approach and prographor these principles across their operations, using third-party verification as appropriate. Key supplier engagement milestones:
- May 2018: All domestic business suppliers informed of Clorox's sourcing commitment and expectations.
- December 2018: Deadline for priority suppliers to submit relevant policies, procedures, commitments, and/or action plans demonstrating how the materially comply with our palm sourcing requirements and Business Partner Code of Conduct.
- 2. Trace our core volumes to key milestones in the supply chain, including origin refiner and mill.
- 3. Leverage key points in the supply chain where we can influence change and support related transformation activities on the ground.

We believe the key to achieving these goals is open communication and transparency, whether it is with our suppliers, NGOs or the public. Consist that approach, we have committed to providing semi-annual progress updates, the first of which was published in October 2016. All our progress updates to be found on our website.

Related link:

https://www.thecloroxcompany.com/corporate-responsibility/environmental-sustainability/commitments-and-progress/supply-chain/palm-oil/

7.3 Your answers above indicate that you are not yet using 100% RSPO certified palm oil and oil palm products. Do you have plans to immediately cover the gap using Book & Claim?

No

Please explain why

The Clorox commitment is defined as follows:

https://www.thecloroxcompany.com/corporate-responsibility/environmental-sustainability/commitments-and-progress/supply-chain/palm-oil/

GHG Footprint

8.1 Are you currently reporting any GHG footprint?

Yes

Related link: https://www.thecloroxcompany.com/corporate-responsibility/environmental-sustainability/commitments-and-progress/operation

Support for Smallholders

9.1 Are you currently supporting any independent smallholder groups?

No

Do you have any future plans to support independent smallholders?

Yes, in 2020

Challenges

1 What significant economic, social or environmental obstacles have you encountered in the production, procurement, use and/or promotion of CSPO and what efforts did you make to mitigate or resolve them?

We have encountered significant obstacles regarding RSPO-certified sustainable palm oil products, specifically related to palm derivatives. The vast majority of our palm footprint involves the use of derivatives of palm oil and palm kernel oil. It is our experience that commercial availability of such oleochemical ingredients does not meet global demand, and the assortment of palm derivatives are not all available from RSPO-certified manufacturers or producers. Beyond commercial availability, we are further limited in the usage of RSPO-certified sustainable palm derivatives because the Clorox Palm Oil Responsible Sourcing Commitment goes well beyond RSPO Principles and Criteria. While we support RSPO Principles and Criteria, we established our Palm Oil Responsible Sourcing Commitment through extensive multistakeholder engagement and believe our responsibility is to source palm-derived ingredients in a manner that does not contribute to deforestation, protects peatlands and respects human rights in our sourcing communities. We have invested in partnerships through The Natural Resources Stewardship Circle, The Forest Trust, and AIM-Progress to engage our suppliers and collaborate within the industry. We look forward to participating in the 2018 review of RSPO Principles and Criteria in an effort to more closely align them with our commitments and stakeholder expectations to drive transformation within our palm supply chains. Clorox has been working with our implementation partner, The Forest Trust, or TFT, to drive positive change on the ground in palm sourcing communities. We're supporting Priority Areas for Transformation, a program focused on land-use planning within a highly biodiverse 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. Clorox will continue to support this work as well as identify additional opportunities and partners that will allow us to promote industrywide transformation. We will encourage our suppliers and responsible sourcing industry partners to increase their involvement in that transformation effort as well. As a company, we recognize there are many challenges associated with the production of palm oil and its derivatives that are widespread and common throughout the industry, and it will take time to address all of them on a large scale. To ensure that progress is being made, we expect our suppliers to have time-bound action plans, including grievance mechanisms and procedures, to react to and address issues as they arise. Other contributions to industry transformation that Clorox will encourage include participating in training and workshops aimed at actively addressing the palm industry's most critical and widespread challenges; improving practices in our suppliers' supply chains beyond certification and sourcing policy and/or commitments; and increasing percentages of suppliers' palm volumes covered by broad transformation plans.

2 In addition to the actions already reported in this ACOP how has your organization supported the vision of RSPO to transform markets in other ways? (e.g. Funding; Engagement with key stakeholders; Business to business education/outreach)

We have contracted with third-party experts to advise our strategy for the responsible sourcing of palm oil ingredients. We also are members of The Forest Trust (TFT). We work with reputable organizations and supply chain partners to ensure responsible sourcing of palm oil-derived ingredients for cosmetics, food and household products. In order to drive collaboration, we are members of two responsible sourcing industry organizations, AIM-Progress and the Natural Resources Stewardship Circle, which seek to drive best practices and transformation in upstream supply chains, including natural ingredients such as palm oil.

3 File -Please attach or add links to any other information from your organisation on your policies and actions on palm oil (EG: sustainability reports, policies, other public information)

No files were uploaded

Link: https://www.thecloroxcompany.com/corporate-responsibility/environmental-sustainability/commitments-and-progress /supply-chain/palm-oil/