

Particulars

About Your 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

2.1.1 In the markets where you operate, in which do you manufacture goods with palm oil and oil palm products?

- Applies Globally
- United States

2.1.2 Do you have a system for calculating how much palm oil and oil palm products you use?

Yes

2.1.3 Does this system only cover your own-brand or all the brands you manufacture?

own-brand

2.1.4 In the markets where you operate, in which do you calculate how much palm oil and oil palm product there is, in the goods you manufacture?

- Applies Globally

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)

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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)

3,813

2.2.5 Total volume of all palm oil and oil palm products used in the year (Tonnes)

3,814

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 & Claim	-	-	-	-
2.3.2 Mass Balance	-	-	-	-
2.3.3 Segregated	-	-	-	-
2.3.4 Identity Preserved	-	-	-	-
2.3.5 Total volume	-	-	-	-

2.4 Volume of RSPO certified sustainable palm oil and oil palm products sold to other RSPO certified companies (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 & Claim	-	-	-	-
2.4.2 Mass Balance	-	-	-	-
2.4.3 Segregated	-	-	-	-
2.4.4 Identity Preserved	-	-	-	-
2.4.5 Total volume	-	-	-	-

2.5 What is the percentage of RSPO certified sustainable palm oil and oil palm products in the total volume used by your company in the following regions:

2.5.1 Africa	--
2.5.2 Australasia	--
2.5.3 China	--
2.5.4 Europe	--
2.5.5 India	--
2.5.6 North America	--
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 2012, we set a public goal that we would source all palm oil ingredients from Roundtable on Sustainable Palm Oil-certified sustainable palm oil or through Green Palm offsets by the year 2020. In 2015, we created a more robust and comprehensive Palm Oil Responsible Sourcing Commitment that replaces the goal set in 2012. This new commitment expands the scope of our palm oil ingredient sourcing practices to address three key areas: deforestation and peatland protection, business ethics and human rights, and traceability. Per this commitment, by the end of 2020 we'll require suppliers to secure third-party 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 peatland protection. By the end of 2020, we'll require suppliers to secure third-party verification to demonstrate compliance with the following sourcing practices 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 Value[2] forests across 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 the Business Partner Code of Conduct:

- 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 hours, 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 transparent, 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—such examples are Paraquat, as well as chemicals categorized as World Health Organization Class 1A or 1B, or listed by the Stockholm or Rotterdam Conventions.

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 verification of sourcing practices that include no deforestation and the protection of peatlands. Our ambition is to work with suppliers of our palm oil ingredients to map the supply chain back to the mill level by the end of 2017 and, subsequently, to the plantation by 2020. Traceability is far more challenging for palm oil derivatives versus palm oil; therefore, this timeline is subject to change based on more learning and the progress of our suppliers.

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 will soon start the process of developing our strategy for 2025 and will further evaluate our commitment and our means of verification in our supply chain.

Please see additional information on our palm oil Commitment and Action Plan:

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Peoples, 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.

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

2025

Comment:

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3.3 Date expected to be using 100% RSPO certified sustainable palm oil and oil palm products from any supply chain option in your own brand products

2025

Comment:

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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 Preserved, Segregated and/or Mass Balance) in your own brand products

2025

Comment:

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3.5 In which markets where you operate do these commitments cover?

Applies Globally

3.6 Does your company use RSPO certified sustainable palm oil and oil palm products in goods you manufacture on behalf of other companies?

No

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

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

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<https://www.thecloroxcompany.com/wp-content/uploads/clorox-palm-oil-responsible-sourcing-plan.pdf>

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[2] High Conservation Value (HCV) as defined by the HCV network: <https://www.hcvnetwork.org/about-hcvf/the-six-high-conservation-values>.

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

[4] The Clorox Company will follow the definitions and guidance as laid out in the UN Declaration on the Rights of Indigenous

Peoples, 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.

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 along the supply chain

Clorox is working with our current suppliers to ensure the palm oil and derivative ingredients used in our products are from responsible sources. In 2012, we set a public goal that we would source all palm oil ingredients from Roundtable on Sustainable Palm Oil-certified sustainable palm oil or through Green Palm offsets by the year 2020. In 2015, we created a more robust and comprehensive Palm Oil Responsible Sourcing Commitment that replaces the goal set in 2012. This new commitment expands the scope of our palm oil ingredient sourcing practices to address three key areas: deforestation and peatland protection, business ethics and human rights, and traceability. Per this commitment, by the end of 2020 we'll require suppliers to secure third-party 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 peatland protection. By the end of 2020, we'll require suppliers to secure third-party verification to demonstrate compliance with the following sourcing practices 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 Value[2] forests across 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 the Business Partner Code of Conduct:

- 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 hours, 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 transparent, 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—such examples are Paraquat, as well as chemicals categorized as World Health Organization Class 1A or 1B, or listed by the Stockholm or Rotterdam Conventions.

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 reprimand 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 verification of sourcing practices that include no deforestation and the protection of peatlands. Our ambition is to work with suppliers of our palm oil ingredients to map the supply chain back to the mill level by the end of 2017 and, subsequently, to the plantation by 2020. Traceability is far more challenging for palm oil derivatives versus palm oil; therefore, this timeline is subject to change based on more learning and the progress of our suppliers.

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 will soon start the process of developing our strategy for 2025 and will further evaluate our commitment and our means of verification in our supply chain.

Please see additional information on our palm oil Commitment and Action Plan:

<https://www.thecloroxcompany.com/corporate-responsibility/environmental-sustainability/commitments-and-progress/supply-chain/palm-oil/>
<https://www.thecloroxcompany.com/wp-content/uploads/clorox-palm-oil-responsible-sourcing-plan.pdf>

[1] High Carbon Stock (HCS) forests as defined at <http://highcarbonstock.org> by the HCS Steering Group.

[2] High Conservation Value (HCV) as defined by the HCV network: <https://www.hcvnetwork.org/about-hcvf/the-six-high-conservation-values>.

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

6.1 If you have not disclosed any of the above information, please indicate the reasons why

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- Others:

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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 footprintsUploaded file: [M-Policies-to-PNC-waterland.pdf](#)

For administration purpose, attachment files are renamed automatically

Related link: <https://www.thecloroxcompany.com/corporate-responsibility/environmental-sustainability/commitments-and-progress/supply-chain/palm-oil/> Land Use RightsUploaded file: [M-Policies-to-PNC-landuseright.pdf](#)

For administration purpose, attachment files are renamed automatically

Related link: <https://www.thecloroxcompany.com/corporate-responsibility/environmental-sustainability/commitments-and-progress/supply-chain/palm-oil/> Ethical conduct and human rightsUploaded file: [M-Policies-to-PNC-ethicalconducthr.pdf](#)

For administration purpose, attachment files are renamed automatically

Related link: <https://www.thecloroxcompany.com/corporate-responsibility/environmental-sustainability/commitments-and-progress/supply-chain/palm-oil/> Labour rightsUploaded file: [M-Policies-to-PNC-laborrights.pdf](#)

For administration purpose, attachment files are renamed automatically

Related link: <https://www.thecloroxcompany.com/corporate-responsibility/environmental-sustainability/commitments-and-progress/supply-chain/palm-oil/> Stakeholder engagementUploaded file: [M-Policies-to-PNC-stakeholderengagement.pdf](#)

For administration purpose, attachment files are renamed automatically

Related link: <https://www.thecloroxcompany.com/corporate-responsibility/environmental-sustainability/commitments-and-progress/supply-chain/palm-oil/> 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 certified sustainable palm oil and oil palm products? What languages are these guidelines available in?**

While our commitments are not specific to CSPO, we are making significant progress toward responsibly sourcing palm oil. More information on our commitments, action plans and progress can be found on our website (links below). The following are highlights from our 2016-17 palm oil work:

- We have conducted webinars introducing palm-derivative sourcing requirements and performance indicator categories with 100% of our direct suppliers providing ingredients containing palm oil for our U.S. businesses, which represent 83% of company sales.
- We have conducted initial evaluations of the palm oil sourcing practices or plans of our key suppliers (who represent 98% of our direct supplier ingredient domestic palm derivative volume) and are working on next steps with each.
- We have committed to achieving traceability to the first importer level for our key suppliers by September 2017. We have engaged all key suppliers to collect traceability data and continue work to meet this goal.

We believe the key to achieving these goals is open communication and transparency, whether it is with our suppliers, NGOs or the public. As such, we have committed to providing semi-annual disclosures on our progress, the first of which was released in October 2016 and can be found on our website.

Uploaded files: --

Related Link: <https://www.thecloroxcompany.com/corporate-responsibility/environmental-sustainability/commitments-and-progress/supply-chain/palm-oil/>**GHG Emissions**

8.1 Are you currently assessing the GHG emissions from your operations?

Yes

Report file: [M-GHG-Emissions-Report.pdf](#)

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

8.2 Do you publicly report the GHG emissions of your operations?

Yes

Report file: [M-Public-GHG-Report.pdf](#)

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 Company Palm Oil Responsible Sourcing Commitment includes many provisions and requirements beyond those set forth in 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 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.

2 How has your organization supported the vision of RSPO to transform markets? (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, foods 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 in upstream supply chains, including natural ingredients such as palm oil.

3 Other information on palm oil (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/>