

Welcome to your CDP Forests Questionnaire 2023

F0. Introduction

F0.1

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

The Clorox Company is a leading multinational manufacturer and marketer of consumer and professional products with fiscal year 2022 net sales of \$7.1 billion and about 9,000 employees worldwide as of June 30, 2022. The Clorox Company (NYSE: CLX) champions people to be well and thrive every single day. Its trusted brands, which include Brita®, Burt's Bees®, Clorox®, Fresh Step®, Glad®, Hidden Valley®, Kingsford®, Liquid-Plumr®, Pine-Sol® and Rainbow Light®, can be found in about nine of 10 U.S. homes and internationally with brands such as Ajudin®, Clorinda®, Chux® and Poett®. Headquartered in Oakland, California, since 1913, Clorox was one of the first U.S. companies to integrate ESG into its business reporting, with commitments in three areas: Healthy Lives, Clean World and Thriving Communities. Clorox's IGNITE strategy accelerates innovation in key areas to drive growth and deliver value for both the Company's shareholders and society. Specifically, IGNITE focuses on four strategic choices to sustain long-term, profitable growth: Fuel Growth, Innovate Experiences, Reimagine Work and Evolve Portfolio. Integrated goals for environmental, social and governance (ESG) performance are focused in the areas of Healthy Lives, Clean World and Thriving Communities.

To help us advance our ESG work, Clorox is a signatory of the United Nations Global Compact and the Ellen MacArthur Foundation's New Plastics Economy Global Commitment. The company has been broadly recognized for its corporate responsibility efforts, including the FTSE4Good Index Series, a U.S. EPA 2022 Safer Choice Partner of the Year, No. 5 on Newsweek's list of most responsible companies, No. 1 on Barron's 2022 100 Most Sustainable Companies list, listed in the 2023 Bloomberg Gender-Equality Index, on the Human Rights Campaign's 2022 Corporate Equality Index, a Morningstar Sustainalytics 2023 ESG Top-Rated Company, and the 2022 Parity.org Best Places for Women to Advance list, among others. In support of its communities, in fiscal year 2022, we provided cash grants, U.S. product donations and cash for cause marketing totaling nearly \$89 million to support public health and the communities where our employees live and work - this was higher than in previous years, primarily due to one-time donations made in connection with exiting a supplier relationship. In looking at the forest commodities in our supply chain, we've identified wood-based fiber use and sourcing for our packaging as the areas where we can have the greatest impact on reducing the pressure on natural forests. We also recognize that responsibly sourcing palm oil ingredients plays a key role in protecting human rights while conserving the environment, including our forests. Our Ignite ESG goals include forest related goals such as reducing the amount of virgin plastic and fiber in our packaging and increasing the percent of our packaging that can be reused, recycled, or composted (R/R/C).

Learn more about our IGNITE strategy and our ESG goals to ensure Clorox remains a leader in corporate responsibility by visiting www.thecloroxcompany.com.

F0.2

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

	Start Date	End Date
Reporting year	January 1, 2022	December 31, 2022

F0.3

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

USD

F0.4

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

Timber products

Commodity disclosure

Disclosing

Stage of the value chain

Manufacturing

Are you disclosing information on embedded commodities?

No, because we have no embedded commodities

Palm oil

Commodity disclosure

Disclosing

Stage of the value chain

Manufacturing

Are you disclosing information on embedded commodities?

No, because we have no embedded commodities

Cattle products

Commodity disclosure

Not disclosing

Stage of the value chain

Manufacturing

Explanation if not disclosing

The only known cattle commodities in our supply chain are buttermilk used in some of our Food products produced in the U.S. and collagen used by our vitamins, minerals, and supplements (VMS) business. The buttermilk ingredients are made from milk produced primarily in the U.S., with potential for some to be sourced in Canada, where there is little known deforestation risk. We purchase small volumes of collagen for our VMS business. Based on the low volumes, we will not be reporting on this commodity at this time.

Soy

Commodity disclosure

Not disclosing

Stage of the value chain

Manufacturing

Explanation if not disclosing

We use soybean oil in some of our food product lines and cosmetics. The soybean oil we purchase directly is produced in the US, with the vast majority made from soybeans grown in the US. For the fraction of soybean oil we purchase that is made from soybeans grown outside the U.S. (but oil produced in the US), we estimate the volume to be less than 1%, all of which is sourced from soybeans grown in Canada, with low deforestation risk associated with it.

We use soy derivative ingredients in some of our formulas, such as derivative ingredients that extend the shelf life of some of our food and natural personal care products. These soy derivatives, in aggregate, represent small volumes of soy, with minimal deforestation risk given they are sourced primarily from U.S. suppliers. The soybean oil volumes we purchase are small and we expect to be able to continue to source soybean oil from these same regions with minimal deforestation risk. Although our volumes are small, Clorox participated in the United Soy Bean (USB) Phase 1 Project, soybean mapping exercise with Earthworm to understand overall traceability of the supply chain in the US. Clorox will disclose in the future, if, in the event supply issues require sourcing soybean oil from outside the U.S. in regions where deforestation is a higher risk. At that point, we will provide information on how we would mitigate potential deforestation through mechanisms such as certified sustainable soy material.

Other - Rubber

Commodity disclosure

This commodity is not produced, sourced or used by our organization

Other - Cocoa

Commodity disclosure

Not disclosing

Stage of the value chain

Manufacturing

Explanation if not disclosing

We use cocoa powder and cocoa butter in some of our cosmetics and vitamins and supplements. The materials we purchase are in very small volumes for a very limited number of products. Clorox does not believe that cocoa-based commodities pose a substantive financial or strategic risk to our overall business. However, we recognize that sourcing cocoa does have the potential for adverse forest impacts, so we are committed to sourcing these materials responsibly.

Our responsible sourcing team has done mapping and visited key suppliers at the plantation level to ensure that they have programs in place to mitigate any adverse ESG impacts. While the cocoa-based products in aggregate represent small volumes overall, our policies and procedures help mitigate the deforestation risk along with other ESG impacts.

Other - Coffee

Commodity disclosure

Not disclosing

Stage of the value chain

Manufacturing

Explanation if not disclosing

We use coffee-based ingredients in some of our cosmetics and vitamins and supplements. We purchase very small volumes for a very limited number of products. Clorox does not believe that coffee-derived commodities pose a substantive financial or strategic risk to our overall business. However, we recognize that sourcing coffee does have the potential for adverse forest impacts and we are committed to sourcing these materials responsibly. Coffee-based ingredients in our products in aggregate, represent a very small volumes overall; our responsible sourcing policies and procedures help mitigate risks associated with deforestation and other ESG impacts.

F0.5

(F0.5) Select the option that describes the reporting boundary for which forests-related impacts on your business are being reported

Operational control

F0.6

(F0.6) Select the countries/areas in which you operate.

Argentina
Australia
Canada
Chile
China
Colombia
Costa Rica
Ecuador
Hong Kong SAR, China

- Malaysia
- Mexico
- New Zealand
- Panama
- Peru
- Philippines
- Puerto Rico
- Republic of Korea
- Saudi Arabia
- South Africa
- United Arab Emirates
- United Kingdom of Great Britain and Northern Ireland
- United States of America
- Uruguay

F0.7

(F0.7) Are there any parts of your direct operations or supply chain that are not included in your disclosure?

No

F0.8

(F0.8) Does your organization have an ISIN code or another unique identifier (e.g., Ticker, CUSIP, etc.?)

Indicate whether you are able to provide a unique identifier for your organization	Provide your unique identifier
Yes, an ISIN code	US189054109
Yes, a CUSIP code	189054109
Yes, a Ticker Symbol	CLX

F1. Current state

F1.1

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

Timber products

Activity

- Using as input into product manufacturing
- Distributing/packaging

Form of commodity

- Pulp

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

Source

- Contracted suppliers (manufacturers)

Country/Area of origin

- Argentina
- Australia
- Austria
- Brazil
- Canada
- Chile
- China
- Colombia
- Czechia
- Estonia
- Finland
- France
- Germany
- Hungary
- Latvia
- Mexico
- Peru
- Philippines
- Poland
- Slovakia
- Slovenia
- South Africa
- Spain
- Sweden
- Switzerland
- United Kingdom of Great Britain and Northern Ireland
- United States of America

% of procurement spend

- 1-5%

Comment

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

The substrates for our Wipes cleaning product lines contain paper-based pulp or

cellulose-based textile fiber. Although we don't purchase this fiber directly, in 2022, 97% of these timber-based materials were sourced from the U.S. with 1% of the tree-based material in our wipes from certified sources and 97% from certifiable sources.

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

We are committed to reducing our forest related impacts. Our Ignite ESG goals include 50% combined reduction in virgin plastic and fiber packaging, doubling post-consumer recycled plastic in packaging by 2030 (+50% by 2025), having 100% recyclable, reusable or compostable (R/R/C) packaging by 2025.

Palm oil

Activity

Using as input into product manufacturing

Form of commodity

Refined palm oil
 Palm oil derivatives
 Palm kernel oil derivatives

Source

Contracted suppliers (manufacturers)

Country/Area of origin

Brazil
 Cambodia
 Colombia
 Costa Rica
 Côte d'Ivoire
 Ecuador
 Gabon
 Guatemala
 Honduras
 Indonesia
 Liberia
 Malaysia
 Nicaragua
 Panama
 Papua New Guinea
 Philippines
 Solomon Islands
 Thailand

% of procurement spend

1-5%

Comment

The company’s use of palm oil ingredients is largely limited to derivatives of palm and palm kernel oil, with derivatives representing more than 99% of palm oil and palm kernel oil consumed. Typically present in very small percentages as sub-components of surfactants, fatty alcohols, emulsifiers or fragrances, palm oil derivatives are used in some of our bio-based and conventional cleaning products, food flavorings and fragrances as well as natural personal care products such as cleansers, lotions, shampoos and soaps. In 2022 we traced our 2021 volume, achieving a 91 percent traceability to the origin refiner and 98 percent traceability to the mill for our priority suppliers, which represented 89 percent of our palm oil derivative purchases. We work to reduce our palm-related impacts and have a committed to procuring 100% Certified Sustainable Palm Oil (CSPO) by 2025.

F1.2

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

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

F1.5

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

Data availability/Disclosure

Timber products	Consumption data available, disclosing
Palm oil	Consumption data available, disclosing

F1.5a

(F1.5a) Disclose your production and/or consumption figure, and the percentage of commodity volumes verified as deforestation- and/or conversion-free.

Forest risk commodity

Timber products

Data type

Consumption data

Commodity production/ consumption volume

850,000

Metric for commodity production/ consumption volume

Metric tons

Data coverage

Full commodity production/consumption

Have any of your reported commodity volumes been verified as deforestation- and/or conversion-free?

No, and we are not planning to verify volumes as deforestation- and/or conversion-free

% of reported volume verified as deforestation- and/or conversion-free

Please explain

Packaging: We use paper-based primary and secondary packaging, including cartons, corrugate, and paper-based materials for several product categories. The majority are sourced in the U.S., with the balance sourced internationally to support products produced in those regions. In 2022, approximately 99% of the fiber in the packaging we purchased was either recycled or certified virgin fiber, based on our annual Fiber Certification Survey with our direct suppliers. We estimate that this volume represents packaging used in approximately 90-95% of our global business (NCS \$).

Wipes: The substrates for most of our Wipes product lines contain paper- based pulp or cellulose-based textile fiber, a smaller volume of wipes contain viscose (specialty fiber). Although we don't purchase this fiber directly, in 2022 approximately 97% of these materials were sourced from the U.S. and approximately 98 percent of the tree-based material in our wipes were from certified or certifiable sources, based on our annual Fiber Certification Survey with our direct suppliers. The wipes fiber data reported are limited to suppliers for our U.S. and U.S. Export businesses, which make up the vast majority of our wipes fiber volumes.

Wood Byproducts: Our Kingsford Manufacturing Division uses mill wood residuals and

by-products in its manufacturing process to create charcoal briquettes. By using residual and by-product wood, we are able to minimize our footprint by not cutting down trees to be utilized in the manufacturing process. The wood used in the Kingsford business primarily sourced in the U.S.

The total consumption volume is based on purchased volumes of raw materials or volumes reported in our supplier surveys. Our Sustainable Sourcing Standard states that materials will be from sources that ...avoid deforestation of primary and secondary forests with significant ecological value. This includes “High Carbon Stock” forests and peat lands. Our Environmental Social Governance (ESG) sourcing team does not track or verify the volumes that are deforestation or conversion free.

Forest risk commodity

Palm oil

Data type

Consumption data

Commodity production/ consumption volume

2,742

Metric for commodity production/ consumption volume

Metric tons

Data coverage

Partial commodity production/consumption

Have any of your reported commodity volumes been verified as deforestation- and/or conversion-free?

No, and we are not planning to verify volumes as deforestation- and/or conversion-free

% of reported volume verified as deforestation- and/or conversion-free

Please explain

Clorox uses very small volumes of palm-based ingredients in our products relative to Global consumption. The volume represents over 99% palm oil and palm kernel oil feedstocks in derivative ingredients sourced directly by the company for products produced globally. The reported volume does not include material sourced by contract manufacturers producing turn-key products. We estimate that this reported volume represents more than 85% of global palm oil material consumed in products sold by Clorox, based on sales. We have a commitment to source 100% Certified Sustainable Palm Oil (CSPO).

Our Sustainable Sourcing Standard states that materials will be from sources that ...avoid deforestation of primary and secondary forests with significant ecological value. This includes “High Carbon Stock” forests and peat lands. Our Environmental Social Governance (ESG) sourcing team does not track or verify the volumes that are deforestation or conversion free. Clorox also has public sustainable palm oil

commitments aligned with the RSPO Principles and Criteria, including what is commonly referred to as NDPE (No Deforestation, No Peat and No Exploitation). Our Environmental Social Governance (ESG) sourcing team does not track or verify the volumes that are deforestation or conversion free.

F1.5c

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

Forest risk commodity

Timber products

Country/Area of origin

Argentina

State or equivalent jurisdiction

Specify state/equivalent jurisdiction

Misiones Y Corrientes

% of total production/consumption volume

0.01

Please explain

This number is calculated as a percentage of our total global timber footprint, which includes packaging, wipes fiber, and wood by-product. Our timber commodities sourced from Argentina are limited to packaging fiber.

Fiber sourced from Argentina makes up approximately 0.05% of our total global packaging fiber volume and we have verified through our annual Fiber Certification Survey that this volume is more than 73% certified virgin or recycled fiber.

Packaging: We use paper-based primary and secondary packaging, including cartons, corrugate, and paper-based materials for several product categories. The majority are sourced in the U.S., with the balance sourced internationally to support products produced in those regions.

Wipes: The substrates for most of our Wipes product lines contain paper-based pulp or cellulose-based textile fiber, a smaller volume of wipes contain viscose (specialty fiber). Although we don't purchase this fiber directly, in 2022, approximately 97% of these materials were sourced from the U.S. and approximately 98 percent of the tree-based material in our wipes were from certified or certifiable sources.

Wood Byproducts: Our Kingsford Manufacturing Division uses mill wood residuals and by-products in its manufacturing process to create charcoal briquettes. By using residual and by-product wood, we are able to minimize our footprint by not cutting down trees to be utilized in the manufacturing process. The wood used in the Kingsford business is primarily sourced in the U.S.

Forest risk commodity

Timber products

Country/Area of origin

Australia

State or equivalent jurisdiction

Specify state/equivalent jurisdiction
New South Wales

% of total production/consumption volume

0.01

Please explain

This number is calculated as a percentage of our total global timber footprint, which includes packaging fiber, wipes fiber, and wood by-product. Our Timber commodities sourced from Australia are limited to packaging fiber.

Fiber sourced from Australia makes up approximately 0.08% of our total global packaging fiber volume and we have verified through our annual Fiber Certification Survey that this volume is 100% certified virgin or recycled fiber.

Packaging: We use paper-based primary and secondary packaging, including cartons, corrugate, and paper-based materials for several product categories. The majority are sourced in the U.S., with the balance sourced internationally to support products produced in those regions.

Wipes: The substrates for most of our Wipes product lines contain paper-based pulp or cellulose-based textile fiber, a smaller volume of wipes contain viscose (specialty fiber). Although we don't purchase this fiber directly, in 2022, approximately 97% of these materials were sourced from the U.S. and approximately 98 percent of the tree-based material in our wipes were from certified or certifiable sources.

Wood Byproducts: Our Kingsford Manufacturing Division uses mill wood residuals and by-products in its manufacturing process to create charcoal briquettes. By using residual and by-product wood, we are able to minimize our footprint by not cutting down trees to be utilized in the manufacturing process. The wood used in the Kingsford business is primarily sourced in the U.S.

Forest risk commodity

Timber products

Country/Area of origin

Brazil

State or equivalent jurisdiction

Specify state/equivalent jurisdiction
Santa Catarina, San Pablo, Parana

% of total production/consumption volume

0.02

Please explain

This number is calculated as a percentage of our total global timber footprint, which includes packaging fiber, wipes fiber, and wood by-product. Our Timber commodities sourced from Brazil are limited to packaging fiber.

Fiber sourced from Brazil makes up approximately 0.11% of our total global packaging fiber volume and we have verified through our annual Fiber Certification Survey that this volume is approximately 100% certified virgin or recycled fiber.

Packaging: We use paper-based primary and secondary packaging, including cartons, corrugate, and paper-based materials for several product categories. The majority are sourced in the U.S., with the balance sourced internationally to support products produced in those regions.

Wipes: The substrates for most of our Wipes product lines contain paper- based pulp or cellulose-based textile fiber, a smaller volume of wipes contain viscose (specialty fiber). Although we don't purchase this fiber directly, in 2022, approximately 97% of these materials were sourced from the U.S. and approximately 98 percent of the tree-based material in our wipes were from certified or certifiable sources.

Wood Scrap: Our Kingsford Manufacturing Division uses mill wood residuals and by-products in its manufacturing process to create charcoal briquettes. By using residual and by-product wood, we are able to minimize our footprint by not cutting down trees to be utilized in the manufacturing process. The wood used in the Kingsford business is primarily sourced in the U.S.

Forest risk commodity

Timber products

Country/Area of origin

Colombia

State or equivalent jurisdiction

Specify state/equivalent jurisdiction
Not reported by supplier

% of total production/consumption volume

0.19

Please explain

This number is calculated as a percentage of our total global timber footprint, which includes packaging fiber, wipes fiber, and wood by-product. Our Timber commodities sourced from Columbia are limited to packaging fiber.

Fiber sourced from Colombia makes up approximately 1.09 % of our total global packaging fiber volume and we have verified through our annual Fiber Certification Survey that this volume is approximately 100% certified virgin or recycled fiber.

Packaging: We use paper-based primary and secondary packaging, including cartons, corrugate, and paper-based materials for several product categories. The majority are sourced in the U.S., with the balance sourced internationally to support products produced in those regions.

Wipes: The substrates for most of our Wipes product lines contain paper- based pulp or cellulose-based textile fiber, a smaller volume of wipes contain viscose (specialty fiber). Although we don't purchase this fiber directly, in 2022, approximately 97% of these materials were sourced from the U.S. and approximately 98 percent of the tree-based material in our wipes were from certified or certifiable sources.

Wood Scrap: Our Kingsford Manufacturing Division uses mill wood residuals and by-products in its manufacturing process to create charcoal briquettes. By using residual and by-product wood, we are able to minimize our footprint by not cutting down trees to be utilized in the manufacturing process. The wood used in the Kingsford business is primarily sourced in the U.S.

Forest risk commodity

Timber products

Country/Area of origin

Mexico

State or equivalent jurisdiction

Specify state/equivalent jurisdiction

Toluca, Estado de Mexico, Tlalnepantla de Baz

% of total production/consumption volume

0.69

Please explain

This number is calculated as a percentage of our total global timber footprint, which includes packaging fiber, wipes fiber, and wood by-product. Our Timber commodities sourced from Mexico are limited to packaging fiber.

Fiber sourced from Mexico makes up approximately 4.0% of our total global packaging fiber volume and we have verified through our annual Fiber Certification Survey that this volume is approximately 100% certified virgin or recycled fiber

Packaging: We use paper-based primary and secondary packaging, including cartons, corrugate, and paper-based materials for several product categories. The majority are sourced in the U.S., with the balance sourced internationally to support products produced in those regions.

Wipes: The substrates for most of our Wipes product lines contain paper- based pulp or cellulose-based textile fiber, a smaller volume of wipes contain viscose (specialty fiber). Although we don't purchase this fiber directly, in 2022, approximately 97% of these materials were sourced from the U.S. and approximately 98 percent of the tree-based material in our wipes were from certified or certifiable sources.

Wood Scrap: Our Kingsford Manufacturing Division uses mill wood residuals and by-products in its manufacturing process to create charcoal briquettes. By using residual and by-product wood, we are able to minimize our footprint by not cutting down trees to be utilized in the manufacturing process. The wood used in the Kingsford business is primarily sourced in the U.S.

Forest risk commodity

Timber products

Country/Area of origin

Peru

State or equivalent jurisdiction

Specify state/equivalent jurisdiction

Lima, Trujillo

% of total production/consumption volume

0.08

Please explain

This number is calculated as a percentage of our total global timber footprint, which includes packaging fiber, wipes fiber, and wood by-product. Our Timber commodities sourced from Peru are limited to packaging fiber.

Fiber sourced from Peru makes up approximately 0.47% of our total global packaging fiber volume and we have verified through our annual Fiber Certification Survey that this volume is approximately 100% certified virgin or recycled fiber.

Packaging: We use paper-based primary and secondary packaging, including cartons, corrugate, and paper-based materials for several product categories. The majority are sourced in the U.S., with the balance sourced internationally to support products produced in those regions.

Wipes: The substrates for most of our Wipes product lines contain paper-based pulp or cellulose-based textile fiber, a smaller volume of wipes contain viscose (specialty fiber). Although we don't purchase this fiber directly, in 2022, approximately 97% of these materials were sourced from the U.S. and approximately 98 percent of the tree-based material in our wipes were from certified or certifiable sources.

Wood Scrap: Our Kingsford Manufacturing Division uses mill wood residuals and by-products in its manufacturing process to create charcoal briquettes. By using residual and by-product wood, we are able to minimize our footprint by not cutting down trees to be utilized in the manufacturing process. The wood used in the Kingsford business is primarily sourced in the U.S.

Forest risk commodity

Timber products

Country/Area of origin

Philippines

State or equivalent jurisdiction

Specify state/equivalent jurisdiction
 Not reported by supplier

% of total production/consumption volume

0

Please explain

This number is calculated as a percentage of our total global timber footprint, which includes packaging fiber, wipes fiber, and wood by-product. Our Timber commodities sourced from Philippines are limited to packaging fiber. We source less than 0.01% of our total fiber from the Philippines,.

Fiber sourced from the Philippines makes up approximately 0.05% of our total global packaging fiber volume and we have verified through our annual Fiber Certification Survey that this volume is approximately 100% certified virgin or recycled fiber.

Packaging: We use paper-based primary and secondary packaging, including cartons, corrugate, and paper-based materials for several product categories. The majority are sourced in the U.S., with the balance sourced internationally to support products produced in those regions.

Wipes: The substrates for most of our Wipes product lines contain paper-based pulp or cellulose-based textile fiber, a smaller volume of wipes contain viscose (specialty fiber). Although we don't purchase this fiber directly, in 2022, approximately 97% of these materials were sourced from the U.S. and approximately 98 percent of the tree-based material in our wipes were from certified or certifiable sources.

Wood Scrap: Our Kingsford Manufacturing Division uses mill wood residuals and by-products in its manufacturing process to create charcoal briquettes. By using residual and by-product wood, we are able to minimize our footprint by not cutting down trees to be utilized in the manufacturing process. The wood used in the Kingsford business is primarily sourced in the U.S.

Forest risk commodity

Timber products

Country/Area of origin

Any other countries/areas

State or equivalent jurisdiction

% of total production/consumption volume

98.99

Please explain

This number is calculated as a percentage of our total global timber footprint, which includes packaging fiber, wipes fiber, and wood by-product. This data was verified through our annual Fiber Certification Survey. Approximately 94.2 of the fiber in our packaging sourced is sourced from other countries (not on the CDP List),

- Canada: 0.44% of our total consumption volume, 2.49% of our packaging consumption

volume.

- Chile: less than 0.01% of our total consumption volume, less than 0.01% of our packaging consumption volume.
 - China: 0.04% of our total consumption volume, 0.24% of our packaging consumption volume.
 - European Countries (Austria, Czech, Estonia, Finland, France, German, Hungary, Latvia, Poland, Slovakia, Slovenia, Spain, Sweden, & Switzerland): 0.15% of our total consumption volume, 0.68% of our packaging consumption volume.
 - South Africa: a very small amount of our wipes fiber, less than 0.01% of our total consumption volume and 0% of our packaging consumption volume.
 - United Kingdom: 0.02% of our total consumption volume, 0.12% of our packaging consumption volume.
 - United States of America: 96.21% of our total consumption volume, 78.36% of our packaging consumption volume.
 - Unknown/Unaccounted for/Untracked: 2.14% of our total consumption volume, 12.28% of our packaging consumption volume.
- Almost 99% of the fiber in our packaging sourced for these countries is either recycled or certified virgin fiber. Approximately 98 percent of the tree-based material in our wipes are from certified or certifiable sources.

Forest risk commodity

Palm oil

Country/Area of origin

Brazil

State or equivalent jurisdiction

Specify state/equivalent jurisdiction

Para

% of total production/consumption volume

0.27

Please explain

In 2022 we traced 89% of our 2021 global business palm oil derivative purchases (e.g., priority suppliers providing more than 50MT of volume), achieving a 91% traceability to the origin refiner and a 98% traceability to the mill.

0.27% of our palm oil or palm kernel oil derivative purchases is traced to jurisdictions in Brazil.

Mill counts are used to quantify the volumes we procure by country and region.

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

Forest risk commodity

Palm oil

Country/Area of origin

Cambodia

State or equivalent jurisdiction

Specify state/equivalent jurisdiction
Kaoh Kong

% of total production/consumption volume

0.05

Please explain

In 2022 we traced 89% of our 2021 global business palm oil derivative purchases (e.g., priority suppliers providing more than 50MT of volume), achieving a 91% traceability to the origin refiner and a 98% traceability to the mill.

0.11% of our palm oil or palm kernel oil derivative purchases is traced to jurisdictions in Cambodia.

Mill counts are used to quantify the volumes we procure by country and region.

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

Forest risk commodity

Palm oil

Country/Area of origin

Cambodia

State or equivalent jurisdiction

Specify state/equivalent jurisdiction
Sihanouk

% of total production/consumption volume

0.06

Please explain

In 2022 we traced 89% of our 2021 global business palm oil derivative purchases (e.g., priority suppliers providing more than 50MT of volume), achieving a 91% traceability to the origin refiner and a 98% traceability to the mill.

0.11% of our palm oil or palm kernel oil derivative purchases is traced to jurisdictions in Cambodia.

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

Forest risk commodity

Palm oil

Country/Area of origin

Colombia

State or equivalent jurisdiction

Specify state/equivalent jurisdiction

Antioquia

% of total production/consumption volume

0.05

Please explain

In 2022 we traced 89% of our 2021 global business palm oil derivative purchases (e.g., priority suppliers providing more than 50MT of volume), achieving a 91% traceability to the origin refiner and a 98% traceability to the mill.

3.28% of our palm oil or palm kernel oil derivative purchases is traced to jurisdictions in Colombia.

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

Forest risk commodity

Palm oil

Country/Area of origin

Colombia

State or equivalent jurisdiction

Specify state/equivalent jurisdiction

Bolivar

% of total production/consumption volume

0.22

Please explain

In 2022 we traced 89% of our 2021 global business palm oil derivative purchases (e.g., priority suppliers providing more than 50MT of volume), achieving a 91% traceability to the origin refiner and a 98% traceability to the mill.

3.28% of our palm oil or palm kernel oil derivative purchases is traced to jurisdictions in Colombia.

Mill counts are used to quantify the volumes we procure by country and region.

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

Forest risk commodity

Palm oil

Country/Area of origin

Colombia

State or equivalent jurisdiction

Specify state/equivalent jurisdiction
Casanare

% of total production/consumption volume

0.33

Please explain

In 2022 we traced 89% of our 2021 global business palm oil derivative purchases (e.g., priority suppliers providing more than 50MT of volume), achieving a 91% traceability to the origin refiner and a 98% traceability to the mill.

3.28% of our palm oil or palm kernel oil derivative purchases is traced to jurisdictions in Colombia.

Mill counts are used to quantify the volumes we procure by country and region.

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

Forest risk commodity

Palm oil

Country/Area of origin

Colombia

State or equivalent jurisdiction

Specify state/equivalent jurisdiction

Cesar

% of total production/consumption volume

0.49

Please explain

In 2022 we traced 89% of our 2021 global business palm oil derivative purchases (e.g., priority suppliers providing more than 50MT of volume), achieving a 91% traceability to the origin refiner and a 98% traceability to the mill.

3.28% of our palm oil or palm kernel oil derivative purchases is traced to jurisdictions in Colombia.

Mill counts are used to quantify the volumes we procure by country and region.

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

Forest risk commodity

Palm oil

Country/Area of origin

Colombia

State or equivalent jurisdiction

Specify state/equivalent jurisdiction

Meta

% of total production/consumption volume

1.15

Please explain

In 2022 we traced 89% of our 2021 global business palm oil derivative purchases (e.g., priority suppliers providing more than 50MT of volume), achieving a 91% traceability to the origin refiner and a 98% traceability to the mill.

3.28% of our palm oil or palm kernel oil derivative purchases is traced to jurisdictions in Colombia.

Mill counts are used to quantify the volumes we procure by country and region.

Accordingly, the percent of total production/consumption volume reported is based on

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

Forest risk commodity

Palm oil

Country/Area of origin

Colombia

State or equivalent jurisdiction

Specify state/equivalent jurisdiction
Narino

% of total production/consumption volume

0.05

Please explain

In 2022 we traced 89% of our 2021 global business palm oil derivative purchases (e.g., priority suppliers providing more than 50MT of volume), achieving a 91% traceability to the origin refiner and a 98% traceability to the mill.

3.28% of our palm oil or palm kernel oil derivative purchases is traced to jurisdictions in Colombia.

Mill counts are used to quantify the volumes we procure by country and region.

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

Forest risk commodity

Palm oil

Country/Area of origin

Colombia

State or equivalent jurisdiction

Specify state/equivalent jurisdiction
Norte de Santander

% of total production/consumption volume

0.16

Please explain

In 2022 we traced 89% of our 2021 global business palm oil derivative purchases (e.g., priority suppliers providing more than 50MT of volume), achieving a 91% traceability to the origin refiner and a 98% traceability to the mill.

3.28% of our palm oil or palm kernel oil derivative purchases is traced to jurisdictions in Colombia.

Mill counts are used to quantify the volumes we procure by country and region.

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

Forest risk commodity

Palm oil

Country/Area of origin

Colombia

State or equivalent jurisdiction

Specify state/equivalent jurisdiction
Santander

% of total production/consumption volume

0.38

Please explain

In 2022 we traced 89% of our 2021 global business palm oil derivative purchases (e.g., priority suppliers providing more than 50MT of volume), achieving a 91% traceability to the origin refiner and a 98% traceability to the mill.

3.28% of our palm oil or palm kernel oil derivative purchases is traced to jurisdictions in Colombia.

Mill counts are used to quantify the volumes we procure by country and region.

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

Forest risk commodity

Palm oil

Country/Area of origin

Colombia

State or equivalent jurisdiction

Specify state/equivalent jurisdiction

Vichada

% of total production/consumption volume

0.11

Please explain

In 2022 we traced 89% of our 2021 global business palm oil derivative purchases (e.g., priority suppliers providing more than 50MT of volume), achieving a 91% traceability to the origin refiner and a 98% traceability to the mill.

3.28% of our palm oil or palm kernel oil derivative purchases is traced to jurisdictions in Colombia.

Mill counts are used to quantify the volumes we procure by country and region.

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

Forest risk commodity

Palm oil

Country/Area of origin

Côte d'Ivoire

State or equivalent jurisdiction

Specify state/equivalent jurisdiction

Bas-Sassandra

% of total production/consumption volume

0.38

Please explain

In 2022 we traced 89% of our 2021 global business palm oil derivative purchases (e.g., priority suppliers providing more than 50MT of volume), achieving a 91% traceability to the origin refiner and a 98% traceability to the mill.

0.71% of our palm oil or palm kernel oil derivative purchases is traced to jurisdictions in Côte D'Ivoire.

Mill counts are used to quantify the volumes we procure by country and region.

Accordingly, the percent of total production/consumption volume reported is based on the number of times mills in a given country and province appear in the sourcing data across our priority suppliers as traced by the Earthworm Foundation. The tracing was

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

Forest risk commodity

Palm oil

Country/Area of origin

Côte d'Ivoire

State or equivalent jurisdiction

Specify state/equivalent jurisdiction
Comoe

% of total production/consumption volume

0.22

Please explain

In 2022 we traced 89% of our 2021 global business palm oil derivative purchases (e.g., priority suppliers providing more than 50MT of volume), achieving a 91% traceability to the origin refiner and a 98% traceability to the mill.

0.71% of our palm oil or palm kernel oil derivative purchases is traced to jurisdictions in Côte D'Ivoire.

Mill counts are used to quantify the volumes we procure by country and region.

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

Forest risk commodity

Palm oil

Country/Area of origin

Côte d'Ivoire

State or equivalent jurisdiction

Specify state/equivalent jurisdiction
Goh-Djiboua

% of total production/consumption volume

0.05

Please explain

In 2022 we traced 89% of our 2021 global business palm oil derivative purchases (e.g., priority suppliers providing more than 50MT of volume), achieving a 91% traceability to

the origin refiner and a 98% traceability to the mill.

0.071% of our palm oil or palm kernel oil derivative purchases was traced to jurisdictions in Côte D'Ivoire.

Mill counts are used to quantify the volumes we procure by country and region.

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

Forest risk commodity

Palm oil

Country/Area of origin

Côte d'Ivoire

State or equivalent jurisdiction

Specify state/equivalent jurisdiction

Lagunes

% of total production/consumption volume

0.05

Please explain

In 2022 we traced 89% of our 2021 global business palm oil derivative purchases (e.g., priority suppliers providing more than 50MT of volume), achieving a 91% traceability to the origin refiner and a 98% traceability to the mill.

0.71% of our palm oil or palm kernel oil derivative purchases was traced to jurisdictions in Côte D'Ivoire.

Mill counts are used to quantify the volumes we procure by country and region.

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

Forest risk commodity

Palm oil

Country/Area of origin

Ecuador

State or equivalent jurisdiction

Specify state/equivalent jurisdiction

Esmeraldas

% of total production/consumption volume

0.05

Please explain

In 2022 we traced 89% of our 2021 global business palm oil derivative purchases (e.g., priority suppliers providing more than 50MT of volume), achieving a 91% traceability to the origin refiner and a 98% traceability to the mill.

0.11% of our palm oil or palm kernel oil derivative purchases was traced to jurisdictions in Ecuador.

Mill counts are used to quantify the volumes we procure by country and region.

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

Forest risk commodity

Palm oil

Country/Area of origin

Ecuador

State or equivalent jurisdiction

Specify state/equivalent jurisdiction

Manabi

% of total production/consumption volume

0.05

Please explain

In 2022 we traced 89% of our 2021 global business palm oil derivative purchases (e.g., priority suppliers providing more than 50MT of volume), achieving a 91% traceability to the origin refiner and a 98% traceability to the mill.

0.11% of our palm oil or palm kernel oil derivative purchases was traced to jurisdictions in Ecuador.

Mill counts are used to quantify the volumes we procure by country and region.

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

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

Forest risk commodity

Palm oil

Country/Area of origin

Gabon

State or equivalent jurisdiction

Specify state/equivalent jurisdiction

Estuaire

% of total production/consumption volume

0.05

Please explain

In 2022 we traced 89% of our 2021 global business palm oil derivative purchases (e.g., priority suppliers providing more than 50MT of volume), achieving a 91% traceability to the origin refiner and a 98% traceability to the mill.

0.10% of our palm oil or palm kernel oil derivative purchases was traced to jurisdictions in Gabon.

Mill counts are used to quantify the volumes we procure by country and region.

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

Forest risk commodity

Palm oil

Country/Area of origin

Gabon

State or equivalent jurisdiction

Specify state/equivalent jurisdiction

Ngounie

% of total production/consumption volume

0.05

Please explain

In 2022 we traced 89% of our 2021 global business palm oil derivative purchases (e.g., priority suppliers providing more than 50MT of volume), achieving a 91% traceability to

the origin refiner and a 98% traceability to the mill.

0.10% of our palm oil or palm kernel oil derivative purchases was traced to jurisdictions in Gabon.

Mill counts are used to quantify the volumes we procure by country and region.

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

Forest risk commodity

Palm oil

Country/Area of origin

Ghana

State or equivalent jurisdiction

Specify state/equivalent jurisdiction
Central

% of total production/consumption volume

0.05

Please explain

In 2022 we traced 89% of our 2021 global business palm oil derivative purchases (e.g., priority suppliers providing more than 50MT of volume), achieving a 91% traceability to the origin refiner and a 98% traceability to the mill.

0.33% of our palm oil or palm kernel oil derivative purchases was traced to jurisdictions in Ghana.

Mill counts are used to quantify the volumes we procure by country and region.

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

Forest risk commodity

Palm oil

Country/Area of origin

Ghana

State or equivalent jurisdiction

Specify state/equivalent jurisdiction

Eastern

% of total production/consumption volume

0.11

Please explain

In 2022 we traced 89% of our 2021 global business palm oil derivative purchases (e.g., priority suppliers providing more than 50MT of volume), achieving a 91% traceability to the origin refiner and a 98% traceability to the mill.

0.33% of our palm oil or palm kernel oil derivative purchases was traced to jurisdictions in Ghana.

Mill counts are used to quantify the volumes we procure by country and region.

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

Forest risk commodity

Palm oil

Country/Area of origin

Ghana

State or equivalent jurisdiction

Specify state/equivalent jurisdiction

Oti

% of total production/consumption volume

0.05

Please explain

In 2022 we traced 89% of our 2021 global business palm oil derivative purchases (e.g., priority suppliers providing more than 50MT of volume), achieving a 91% traceability to the origin refiner and a 98% traceability to the mill.

0.33% of our palm oil or palm kernel oil derivative purchases was traced to jurisdictions in Ghana.

Mill counts are used to quantify the volumes we procure by country and region.

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

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

Forest risk commodity

Palm oil

Country/Area of origin

Ghana

State or equivalent jurisdiction

Specify state/equivalent jurisdiction

Western

% of total production/consumption volume

0.11

Please explain

In 2022 we traced 89% of our 2021 global business palm oil derivative purchases (e.g., priority suppliers providing more than 50MT of volume), achieving a 91% traceability to the origin refiner and a 98% traceability to the mill.

0.33% of our palm oil or palm kernel oil derivative purchases was traced to jurisdictions in Ghana.

Mill counts are used to quantify the volumes we procure by country and region.

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

Forest risk commodity

Palm oil

Country/Area of origin

Guatemala

State or equivalent jurisdiction

Specify state/equivalent jurisdiction

Alta Verapaz

% of total production/consumption volume

0.16

Please explain

In 2022 we traced 89% of our 2021 global business palm oil derivative purchases (e.g., priority suppliers providing more than 50MT of volume), achieving a 91% traceability to

the origin refiner and a 98% traceability to the mill.

0.77% of our palm oil or palm kernel oil derivative purchases was traced to jurisdictions in Guatemala.

Mill counts are used to quantify the volumes we procure by country and region.

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

Forest risk commodity

Palm oil

Country/Area of origin

Guatemala

State or equivalent jurisdiction

Specify state/equivalent jurisdiction

Escuintla

% of total production/consumption volume

0.05

Please explain

In 2022 we traced 89% of our 2021 global business palm oil derivative purchases (e.g., priority suppliers providing more than 50MT of volume), achieving a 91% traceability to the origin refiner and a 98% traceability to the mill.

0.77% of our palm oil or palm kernel oil derivative purchases was traced to jurisdictions in Guatemala.

Mill counts are used to quantify the volumes we procure by country and region.

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

Forest risk commodity

Palm oil

Country/Area of origin

Guatemala

State or equivalent jurisdiction

Specify state/equivalent jurisdiction

Peten

% of total production/consumption volume

0.27

Please explain

In 2022 we traced 89% of our 2021 global business palm oil derivative purchases (e.g., priority suppliers providing more than 50MT of volume), achieving a 91% traceability to the origin refiner and a 98% traceability to the mill.

0.77% of our palm oil or palm kernel oil derivative purchases was traced to jurisdictions in Guatemala.

Mill counts are used to quantify the volumes we procure by country and region.

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

Forest risk commodity

Palm oil

Country/Area of origin

Guatemala

State or equivalent jurisdiction

Specify state/equivalent jurisdiction

Quezaltenango

% of total production/consumption volume

0.05

Please explain

In 2022 we traced 89% of our 2021 global business palm oil derivative purchases (e.g., priority suppliers providing more than 50MT of volume), achieving a 91% traceability to the origin refiner and a 98% traceability to the mill.

0.77% of our palm oil or palm kernel oil derivative purchases was traced to jurisdictions in Guatemala.

Mill counts are used to quantify the volumes we procure by country and region.

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

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

Forest risk commodity

Palm oil

Country/Area of origin

Honduras

State or equivalent jurisdiction

Specify state/equivalent jurisdiction

Atlantida

% of total production/consumption volume

0.16

Please explain

In 2022 we traced 89% of our 2021 global business palm oil derivative purchases (e.g., priority suppliers providing more than 50MT of volume), achieving a 91% traceability to the origin refiner and a 98% traceability to the mill.

0.66% of our palm oil or palm kernel oil derivative purchases was traced to jurisdictions in Honduras.

Mill counts are used to quantify the volumes we procure by country and region.

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

Forest risk commodity

Palm oil

Country/Area of origin

Honduras

State or equivalent jurisdiction

Specify state/equivalent jurisdiction

Cortes

% of total production/consumption volume

0.05

Please explain

In 2022 we traced 89% of our 2021 global business palm oil derivative purchases (e.g., priority suppliers providing more than 50MT of volume), achieving a 91% traceability to the origin refiner and a 98% traceability to the mill.

0.66% of our palm oil or palm kernel oil derivative purchases was traced to jurisdictions in Honduras.

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

Forest risk commodity

Palm oil

Country/Area of origin

Honduras

State or equivalent jurisdiction

Specify state/equivalent jurisdiction
Yoro

% of total production/consumption volume

0.11

Please explain

In 2022 we traced 89% of our 2021 global business palm oil derivative purchases (e.g., priority suppliers providing more than 50MT of volume), achieving a 91% traceability to the origin refiner and a 98% traceability to the mill.

0.66% of our palm oil or palm kernel oil derivative purchases was traced to jurisdictions in Honduras.

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

Forest risk commodity

Palm oil

Country/Area of origin

Indonesia

State or equivalent jurisdiction

Specify state/equivalent jurisdiction

Aceh

% of total production/consumption volume

2.79

Please explain

In 2022 we traced 89% of our 2021 global business palm oil derivative purchases (e.g., priority suppliers providing more than 50MT of volume), achieving a 91% traceability to the origin refiner and a 98% traceability to the mill.

63.53% of our palm oil or palm kernel oil derivative purchases was traced to jurisdictions in Indonesia.

Mill counts are used to quantify the volumes we procure by country and region.

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

Forest risk commodity

Palm oil

Country/Area of origin

Indonesia

State or equivalent jurisdiction

Specify state/equivalent jurisdiction

Bangka Belitung

% of total production/consumption volume

1.04

Please explain

In 2022 we traced 89% of our 2021 global business palm oil derivative purchases (e.g., priority suppliers providing more than 50MT of volume), achieving a 91% traceability to the origin refiner and a 98% traceability to the mill.

63.53% of our palm oil or palm kernel oil derivative purchases was traced to jurisdictions in Indonesia.

Mill counts are used to quantify the volumes we procure by country and region.

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

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

Forest risk commodity

Palm oil

Country/Area of origin

Indonesia

State or equivalent jurisdiction

Specify state/equivalent jurisdiction

Banten

% of total production/consumption volume

0.11

Please explain

In 2022 we traced 89% of our 2021 global business palm oil derivative purchases (e.g., priority suppliers providing more than 50MT of volume), achieving a 91% traceability to the origin refiner and a 98% traceability to the mill.

63.53% of our palm oil or palm kernel oil derivative purchases was traced to jurisdictions in Indonesia.

Mill counts are used to quantify the volumes we procure by country and region.

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

Forest risk commodity

Palm oil

Country/Area of origin

Indonesia

State or equivalent jurisdiction

Specify state/equivalent jurisdiction

Bengkulu

% of total production/consumption volume

1.69

Please explain

In 2022 we traced 89% of our 2021 global business palm oil derivative purchases (e.g., priority suppliers providing more than 50MT of volume), achieving a 91% traceability to

the origin refiner and a 98% traceability to the mill.
63.53% of our palm oil or palm kernel oil derivative purchases was traced to jurisdictions in Indonesia.

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

Forest risk commodity

Palm oil

Country/Area of origin

Indonesia

State or equivalent jurisdiction

Specify state/equivalent jurisdiction
Gorontalo

% of total production/consumption volume

0.05

Please explain

In 2022 we traced 89% of our 2021 global business palm oil derivative purchases (e.g., priority suppliers providing more than 50MT of volume), achieving a 91% traceability to the origin refiner and a 98% traceability to the mill.

63.53% of our palm oil or palm kernel oil derivative purchases was traced to jurisdictions in Indonesia.

Mill counts are used to quantify the volumes we procure by country and region.

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

Forest risk commodity

Palm oil

Country/Area of origin

Indonesia

State or equivalent jurisdiction

Specify state/equivalent jurisdiction

Jambi

% of total production/consumption volume

4.65

Please explain

In 2022 we traced 89% of our 2021 global business palm oil derivative purchases (e.g., priority suppliers providing more than 50MT of volume), achieving a 91% traceability to the origin refiner and a 98% traceability to the mill.

63.53% of our palm oil or palm kernel oil derivative purchases was traced to jurisdictions in Indonesia.

Mill counts are used to quantify the volumes we procure by country and region.

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

Forest risk commodity

Palm oil

Country/Area of origin

Indonesia

State or equivalent jurisdiction

Specify state/equivalent jurisdiction

Jawa Barat

% of total production/consumption volume

0.05

Please explain

In 2022 we traced 89% of our 2021 global business palm oil derivative purchases (e.g., priority suppliers providing more than 50MT of volume), achieving a 91% traceability to the origin refiner and a 98% traceability to the mill.

63.53% of our palm oil or palm kernel oil derivative purchases was traced to jurisdictions in Indonesia.

Mill counts are used to quantify the volumes we procure by country and region.

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

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

Forest risk commodity

Palm oil

Country/Area of origin

Indonesia

State or equivalent jurisdiction

Specify state/equivalent jurisdiction

Kalimantan Barat

% of total production/consumption volume

6.12

Please explain

In 2022 we traced 89% of our 2021 global business palm oil derivative purchases (e.g., priority suppliers providing more than 50MT of volume), achieving a 91% traceability to the origin refiner and a 98% traceability to the mill.

63.53% of our palm oil or palm kernel oil derivative purchases was traced to jurisdictions in Indonesia.

Mill counts are used to quantify the volumes we procure by country and region.

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

Forest risk commodity

Palm oil

Country/Area of origin

Indonesia

State or equivalent jurisdiction

Specify state/equivalent jurisdiction

Kalimantan Selatan

% of total production/consumption volume

2.24

Please explain

In 2022 we traced 89% of our 2021 global business palm oil derivative purchases (e.g., priority suppliers providing more than 50MT of volume), achieving a 91% traceability to

the origin refiner and a 98% traceability to the mill.
63.53% of our palm oil or palm kernel oil derivative purchases was traced to jurisdictions in Indonesia.

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

Forest risk commodity

Palm oil

Country/Area of origin

Indonesia

State or equivalent jurisdiction

Specify state/equivalent jurisdiction
Kalimantan Tengah

% of total production/consumption volume

6.01

Please explain

In 2022 we traced 89% of our 2021 global business palm oil derivative purchases (e.g., priority suppliers providing more than 50MT of volume), achieving a 91% traceability to the origin refiner and a 98% traceability to the mill.
63.53% of our palm oil or palm kernel oil derivative purchases was traced to jurisdictions in Indonesia.
Mill counts are used to quantify the volumes we procure by country and region. Accordingly, the percent of total production/consumption volume reported is based on the number of times mills in a given country and province appear in the sourcing data across our priority suppliers as traced by the Earthworm Foundation. The tracing was conducted across multiple tier levels (Tier 1 through Tier 5) and includes suppliers, first aggregator/origin refiner and the additional origin refiner allowing us to identify the region/province of the country where our palm derivatives are sourced.

Forest risk commodity

Palm oil

Country/Area of origin

Indonesia

State or equivalent jurisdiction

Specify state/equivalent jurisdiction

Kalimantan Timur

% of total production/consumption volume

4.59

Please explain

In 2022 we traced 89% of our 2021 global business palm oil derivative purchases (e.g., priority suppliers providing more than 50MT of volume), achieving a 91% traceability to the origin refiner and a 98% traceability to the mill.

63.53% of our palm oil or palm kernel oil derivative purchases was traced to jurisdictions in Indonesia.

Mill counts are used to quantify the volumes we procure by country and region.

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

Forest risk commodity

Palm oil

Country/Area of origin

Indonesia

State or equivalent jurisdiction

Specify state/equivalent jurisdiction

Kalimantan Utara

% of total production/consumption volume

0.77

Please explain

In 2022 we traced 89% of our 2021 global business palm oil derivative purchases (e.g., priority suppliers providing more than 50MT of volume), achieving a 91% traceability to the origin refiner and a 98% traceability to the mill.

63.53% of our palm oil or palm kernel oil derivative purchases was traced to jurisdictions in Indonesia.

Mill counts are used to quantify the volumes we procure by country and region.

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

aggregator/origin refiner and the additional origin refiner allowing us to identify the region/province of the country where our palm derivatives are sourced.

Forest risk commodity

Palm oil

Country/Area of origin

Indonesia

State or equivalent jurisdiction

Specify state/equivalent jurisdiction

Kepulauan Riau

% of total production/consumption volume

0.05

Please explain

In 2022 we traced 89% of our 2021 global business palm oil derivative purchases (e.g., priority suppliers providing more than 50MT of volume), achieving a 91% traceability to the origin refiner and a 98% traceability to the mill.

63.53% of our palm oil or palm kernel oil derivative purchases was traced to jurisdictions in Indonesia.

Mill counts are used to quantify the volumes we procure by country and region.

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

Forest risk commodity

Palm oil

Country/Area of origin

Indonesia

State or equivalent jurisdiction

Specify state/equivalent jurisdiction

Lampung

% of total production/consumption volume

0.93

Please explain

In 2022 we traced 89% of our 2021 global business palm oil derivative purchases (e.g., priority suppliers providing more than 50MT of volume), achieving a 91% traceability to the origin refiner and a 98% traceability to the mill.

63.53% of our palm oil or palm kernel oil derivative purchases is traced to jurisdictions in Indonesia.

Mill counts are used to quantify the volumes we procure by country and region.

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

Forest risk commodity

Palm oil

Country/Area of origin

Indonesia

State or equivalent jurisdiction

Specify state/equivalent jurisdiction

Papua

% of total production/consumption volume

0.27

Please explain

In 2022 we traced 89% of our 2021 global business palm oil derivative purchases (e.g., priority suppliers providing more than 50MT of volume), achieving a 91% traceability to the origin refiner and a 98% traceability to the mill.

63.53% of our palm oil or palm kernel oil derivative purchases was traced to jurisdictions in Indonesia.

Mill counts are used to quantify the volumes we procure by country and region.

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

Forest risk commodity

Palm oil

Country/Area of origin

Indonesia

State or equivalent jurisdiction

Specify state/equivalent jurisdiction
Papua Barat

% of total production/consumption volume

0.11

Please explain

In 2022 we traced 89% of our 2021 global business palm oil derivative purchases (e.g., priority suppliers providing more than 50MT of volume), achieving a 91% traceability to the origin refiner and a 98% traceability to the mill.
63.53% of our palm oil or palm kernel oil derivative purchases was traced to jurisdictions in Indonesia.
Mill counts are used to quantify the volumes we procure by country and region. Accordingly, the percent of total production/consumption volume reported is based on the number of times mills in a given country and province appear in the sourcing data across our priority suppliers as traced by the Earthworm Foundation. The tracing was conducted across multiple tier levels (Tier 1 through Tier 5) and includes suppliers, first aggregator/origin refiner and the additional origin refiner allowing us to identify the region/province of the country where our palm derivatives are sourced.

Forest risk commodity

Palm oil

Country/Area of origin

Indonesia

State or equivalent jurisdiction

Specify state/equivalent jurisdiction
Riau

% of total production/consumption volume

13.34

Please explain

In 2022 we traced 89% of our 2021 global business palm oil derivative purchases (e.g., priority suppliers providing more than 50MT of volume), achieving a 91% traceability to the origin refiner and a 98% traceability to the mill.
63.53% of our palm oil or palm kernel oil derivative purchases was traced to jurisdictions in Indonesia.
Mill counts are used to quantify the volumes we procure by country and region. Accordingly, the percent of total production/consumption volume reported is based on the number of times mills in a given country and province appear in the sourcing data across our priority suppliers as traced by the Earthworm Foundation. The tracing was conducted across multiple tier levels (Tier 1 through Tier 5) and includes suppliers, first aggregator/origin refiner and the additional origin refiner allowing us to identify the

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

Forest risk commodity

Palm oil

Country/Area of origin

Indonesia

State or equivalent jurisdiction

Specify state/equivalent jurisdiction
Sulawesi Barat

% of total production/consumption volume

0.49

Please explain

In 2022 we traced 89% of our 2021 global business palm oil derivative purchases (e.g., priority suppliers providing more than 50MT of volume), achieving a 91% traceability to the origin refiner and a 98% traceability to the mill.

63.53% of our palm oil or palm kernel oil derivative purchases was traced to jurisdictions in Indonesia.

Mill counts are used to quantify the volumes we procure by country and region.

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

Forest risk commodity

Palm oil

Country/Area of origin

Indonesia

State or equivalent jurisdiction

Specify state/equivalent jurisdiction
Sulawesi Selatan

% of total production/consumption volume

0.27

Please explain

In 2022 we traced 89% of our 2021 global business palm oil derivative purchases (e.g., priority suppliers providing more than 50MT of volume), achieving a 91% traceability to

the origin refiner and a 98% traceability to the mill.
63.53% of our palm oil or palm kernel oil derivative purchases was traced to jurisdictions in Indonesia.

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

Forest risk commodity

Palm oil

Country/Area of origin

Indonesia

State or equivalent jurisdiction

Specify state/equivalent jurisdiction
Sulawesi Tengah

% of total production/consumption volume

0.49

Please explain

In 2022 we traced 89% of our 2021 global business palm oil derivative purchases (e.g., priority suppliers providing more than 50MT of volume), achieving a 91% traceability to the origin refiner and a 98% traceability to the mill.

63.53% of our palm oil or palm kernel oil derivative purchases was traced to jurisdictions in Indonesia.

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

Forest risk commodity

Palm oil

Country/Area of origin

Indonesia

State or equivalent jurisdiction

Specify state/equivalent jurisdiction

Sulawesi Tenggara

% of total production/consumption volume

0.05

Please explain

In 2022 we traced 89% of our 2021 global business palm oil derivative purchases (e.g., priority suppliers providing more than 50MT of volume), achieving a 91% traceability to the origin refiner and a 98% traceability to the mill.

63.53% of our palm oil or palm kernel oil derivative purchases was traced to jurisdictions in Indonesia.

Mill counts are used to quantify the volumes we procure by country and region.

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

Forest risk commodity

Palm oil

Country/Area of origin

Indonesia

State or equivalent jurisdiction

Specify state/equivalent jurisdiction

Sumatera Barat

% of total production/consumption volume

2.08

Please explain

In 2022 we traced 89% of our 2021 global business palm oil derivative purchases (e.g., priority suppliers providing more than 50MT of volume), achieving a 91% traceability to the origin refiner and a 98% traceability to the mill.

63.53% of our palm oil or palm kernel oil derivative purchases was traced to jurisdictions in Indonesia.

Mill counts are used to quantify the volumes we procure by country and region.

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

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

Forest risk commodity

Palm oil

Country/Area of origin

Indonesia

State or equivalent jurisdiction

Specify state/equivalent jurisdiction

Sumatera Utara

% of total production/consumption volume

10.83

Please explain

In 2022 we traced 89% of our 2021 global business palm oil derivative purchases (e.g., priority suppliers providing more than 50MT of volume), achieving a 91% traceability to the origin refiner and a 98% traceability to the mill.

63.53% of our palm oil or palm kernel oil derivative purchases was traced to jurisdictions in Indonesia.

Mill counts are used to quantify the volumes we procure by country and region.

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

Forest risk commodity

Palm oil

Country/Area of origin

Liberia

State or equivalent jurisdiction

Specify state/equivalent jurisdiction

Maryland

% of total production/consumption volume

0.05

Please explain

In 2022 we traced 89% of our 2021 global business palm oil derivative purchases (e.g., priority suppliers providing more than 50MT of volume), achieving a 91% traceability to

the origin refiner and a 98% traceability to the mill.
 0.05% of our palm oil or palm kernel oil derivative purchases was traced to jurisdictions in Liberia.
 Mill counts are used to quantify the volumes we procure by country and region. Accordingly, the percent of total production/consumption volume reported is based on the number of times mills in a given country and province appear in the sourcing data across our priority suppliers as traced by the Earthworm Foundation. The tracing was conducted across multiple tier levels (Tier 1 through Tier 5) and includes suppliers, first aggregator/origin refiner and the additional origin refiner allowing us to identify the region/province of the country where our palm derivatives are sourced.

Forest risk commodity

Palm oil

Country/Area of origin

Malaysia

State or equivalent jurisdiction

Specify state/equivalent jurisdiction
 Johor

% of total production/consumption volume

3.61

Please explain

In 2022 we traced 89% of our 2021 global business palm oil derivative purchases (e.g., priority suppliers providing more than 50MT of volume), achieving a 91% traceability to the origin refiner and a 98% traceability to the mill.
 26.08% of our palm oil or palm kernel oil derivative purchases was traced to jurisdictions in Malaysia.
 Mill counts are used to quantify the volumes we procure by country and region. Accordingly, the percent of total production/consumption volume reported is based on the number of times mills in a given country and province appear in the sourcing data across our priority suppliers as traced by the Earthworm Foundation. The tracing was conducted across multiple tier levels (Tier 1 through Tier 5) and includes suppliers, first aggregator/origin refiner and the additional origin refiner allowing us to identify the region/province of the country where our palm derivatives are sourced.

Forest risk commodity

Palm oil

Country/Area of origin

Malaysia

State or equivalent jurisdiction

Specify state/equivalent jurisdiction

Kedah

% of total production/consumption volume

0.33

Please explain

In 2022 we traced 89% of our 2021 global business palm oil derivative purchases (e.g., priority suppliers providing more than 50MT of volume), achieving a 91% traceability to the origin refiner and a 98% traceability to the mill.

26.08% of our palm oil or palm kernel oil derivative purchases was traced to jurisdictions in Malaysia.

Mill counts are used to quantify the volumes we procure by country and region.

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

Forest risk commodity

Palm oil

Country/Area of origin

Malaysia

State or equivalent jurisdiction

Specify state/equivalent jurisdiction

Kelantan

% of total production/consumption volume

0.6

Please explain

In 2022 we traced 89% of our 2021 global business palm oil derivative purchases (e.g., priority suppliers providing more than 50MT of volume), achieving a 91% traceability to the origin refiner and a 98% traceability to the mill.

26.08% of our palm oil or palm kernel oil derivative purchases was traced to jurisdictions in Malaysia.

Mill counts are used to quantify the volumes we procure by country and region.

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

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

Forest risk commodity

Palm oil

Country/Area of origin

Malaysia

State or equivalent jurisdiction

Specify state/equivalent jurisdiction

Melaka

% of total production/consumption volume

0.16

Please explain

In 2022 we traced 89% of our 2021 global business palm oil derivative purchases (e.g., priority suppliers providing more than 50MT of volume), achieving a 91% traceability to the origin refiner and a 98% traceability to the mill.

26.08% of our palm oil or palm kernel oil derivative purchases was traced to jurisdictions in Malaysia.

Mill counts are used to quantify the volumes we procure by country and region.

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

Forest risk commodity

Palm oil

Country/Area of origin

Malaysia

State or equivalent jurisdiction

Specify state/equivalent jurisdiction

Negeri Sembilan

% of total production/consumption volume

0.87

Please explain

In 2022 we traced 89% of our 2021 global business palm oil derivative purchases (e.g., priority suppliers providing more than 50MT of volume), achieving a 91% traceability to

the origin refiner and a 98% traceability to the mill.

26.08% of our palm oil or palm kernel oil derivative purchases was traced to jurisdictions in Malaysia.

Mill counts are used to quantify the volumes we procure by country and region.

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

Forest risk commodity

Palm oil

Country/Area of origin

Malaysia

State or equivalent jurisdiction

Specify state/equivalent jurisdiction

Pahang

% of total production/consumption volume

3.94

Please explain

In 2022 we traced 89% of our 2021 global business palm oil derivative purchases (e.g., priority suppliers providing more than 50MT of volume), achieving a 91% traceability to the origin refiner and a 98% traceability to the mill.

26.08% of our palm oil or palm kernel oil derivative purchases was traced to jurisdictions in Malaysia.

Mill counts are used to quantify the volumes we procure by country and region.

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

Forest risk commodity

Palm oil

Country/Area of origin

Malaysia

State or equivalent jurisdiction

Specify state/equivalent jurisdiction

Perak

% of total production/consumption volume

2.57

Please explain

In 2022 we traced 89% of our 2021 global business palm oil derivative purchases (e.g., priority suppliers providing more than 50MT of volume), achieving a 91% traceability to the origin refiner and a 98% traceability to the mill.

26.08% of our palm oil or palm kernel oil derivative purchases was traced to jurisdictions in Malaysia.

Mill counts are used to quantify the volumes we procure by country and region.

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

Forest risk commodity

Palm oil

Country/Area of origin

Malaysia

State or equivalent jurisdiction

Specify state/equivalent jurisdiction

Pulau Pinang

% of total production/consumption volume

0.11

Please explain

In 2022 we traced 89% of our 2021 global business palm oil derivative purchases (e.g., priority suppliers providing more than 50MT of volume), achieving a 91% traceability to the origin refiner and a 98% traceability to the mill.

26.08% of our palm oil or palm kernel oil derivative purchases was traced to jurisdictions in Malaysia.

Mill counts are used to quantify the volumes we procure by country and region.

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

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

Forest risk commodity

Palm oil

Country/Area of origin

Malaysia

State or equivalent jurisdiction

Specify state/equivalent jurisdiction

Sabah

% of total production/consumption volume

7.44

Please explain

In 2022 we traced 89% of our 2021 global business palm oil derivative purchases (e.g., priority suppliers providing more than 50MT of volume), achieving a 91% traceability to the origin refiner and a 98% traceability to the mill.

26.08% of our palm oil or palm kernel oil derivative purchases was traced to jurisdictions in Malaysia.

Mill counts are used to quantify the volumes we procure by country and region.

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

Forest risk commodity

Palm oil

Country/Area of origin

Malaysia

State or equivalent jurisdiction

Specify state/equivalent jurisdiction

Sarawak

% of total production/consumption volume

4.76

Please explain

In 2022 we traced 89% of our 2021 global business palm oil derivative purchases (e.g., priority suppliers providing more than 50MT of volume), achieving a 91% traceability to

the origin refiner and a 98% traceability to the mill.

26.08% of our palm oil or palm kernel oil derivative purchases was traced to jurisdictions in Malaysia.

Mill counts are used to quantify the volumes we procure by country and region.

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

Forest risk commodity

Palm oil

Country/Area of origin

Malaysia

State or equivalent jurisdiction

Specify state/equivalent jurisdiction
Selangor

% of total production/consumption volume

0.98

Please explain

In 2022 we traced 89% of our 2021 global business palm oil derivative purchases (e.g., priority suppliers providing more than 50MT of volume), achieving a 91% traceability to the origin refiner and a 98% traceability to the mill.

26.08% of our palm oil or palm kernel oil derivative purchases was traced to jurisdictions in Malaysia.

Mill counts are used to quantify the volumes we procure by country and region.

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

Forest risk commodity

Palm oil

Country/Area of origin

Malaysia

State or equivalent jurisdiction

Specify state/equivalent jurisdiction

Terengganu

% of total production/consumption volume

0.71

Please explain

In 2022 we traced 89% of our 2021 global business palm oil derivative purchases (e.g., priority suppliers providing more than 50MT of volume), achieving a 91% traceability to the origin refiner and a 98% traceability to the mill.

26.08% of our palm oil or palm kernel oil derivative purchases was traced to jurisdictions in Malaysia.

Mill counts are used to quantify the volumes we procure by country and region.

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

Forest risk commodity

Palm oil

Country/Area of origin

Nicaragua

State or equivalent jurisdiction

Specify state/equivalent jurisdiction

Atlantico Sur

% of total production/consumption volume

0.11

Please explain

In 2022 we traced 89% of our 2021 global business palm oil derivative purchases (e.g., priority suppliers providing more than 50MT of volume), achieving a 91% traceability to the origin refiner and a 98% traceability to the mill.

0.11% of our palm oil or palm kernel oil derivative purchases was traced to jurisdictions in Nicaragua.

Mill counts are used to quantify the volumes we procure by country and region.

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

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

Forest risk commodity

Palm oil

Country/Area of origin

Panama

State or equivalent jurisdiction

Specify state/equivalent jurisdiction

Chiriqui

% of total production/consumption volume

0.05

Please explain

In 2022 we traced 89% of our 2021 global business palm oil derivative purchases (e.g., priority suppliers providing more than 50MT of volume), achieving a 91% traceability to the origin refiner and a 98% traceability to the mill.

0.05% of our palm oil or palm kernel oil derivative purchases was traced to jurisdictions in Panama.

Mill counts are used to quantify the volumes we procure by country and region.

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

Forest risk commodity

Palm oil

Country/Area of origin

Papua New Guinea

State or equivalent jurisdiction

Specify state/equivalent jurisdiction

Milne Bay

% of total production/consumption volume

0.05

Please explain

In 2022 we traced 89% of our 2021 global business palm oil derivative purchases (e.g., priority suppliers providing more than 50MT of volume), achieving a 91% traceability to

the origin refiner and a 98% traceability to the mill.

0.82% of our palm oil or palm kernel oil derivative purchases was traced to jurisdictions in Papua New Guinea.

Mill counts are used to quantify the volumes we procure by country and region.

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

Forest risk commodity

Palm oil

Country/Area of origin

Papua New Guinea

State or equivalent jurisdiction

Specify state/equivalent jurisdiction

Morobe

% of total production/consumption volume

0.11

Please explain

In 2022 we traced 89% of our 2021 global business palm oil derivative purchases (e.g., priority suppliers providing more than 50MT of volume), achieving a 91% traceability to the origin refiner and a 98% traceability to the mill.

0.82% of our palm oil or palm kernel oil derivative purchases was traced to jurisdictions in Papua New Guinea.

Mill counts are used to quantify the volumes we procure by country and region.

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

Forest risk commodity

Palm oil

Country/Area of origin

Papua New Guinea

State or equivalent jurisdiction

Specify state/equivalent jurisdiction
New Ireland

% of total production/consumption volume

0.05

Please explain

In 2022 we traced 89% of our 2021 global business palm oil derivative purchases (e.g., priority suppliers providing more than 50MT of volume), achieving a 91% traceability to the origin refiner and a 98% traceability to the mill.

0.82% of our palm oil or palm kernel oil derivative purchases was traced to jurisdictions in Papua New Guinea.

Mill counts are used to quantify the volumes we procure by country and region.

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

Forest risk commodity

Palm oil

Country/Area of origin

Papua New Guinea

State or equivalent jurisdiction

Specify state/equivalent jurisdiction

Oro

% of total production/consumption volume

0.16

Please explain

In 2022 we traced 89% of our 2021 global business palm oil derivative purchases (e.g., priority suppliers providing more than 50MT of volume), achieving a 91% traceability to the origin refiner and a 98% traceability to the mill.

0.82% of our palm oil or palm kernel oil derivative purchases was traced to jurisdictions in Papua New Guinea.

Mill counts are used to quantify the volumes we procure by country and region.

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

Forest risk commodity

Palm oil

Country/Area of origin

Papua New Guinea

State or equivalent jurisdiction

Specify state/equivalent jurisdiction
West New Britain

% of total production/consumption volume

0.44

Please explain

In 2022 we traced 89% of our 2021 global business palm oil derivative purchases (e.g., priority suppliers providing more than 50MT of volume), achieving a 91% traceability to the origin refiner and a 98% traceability to the mill.

0.82% of our palm oil or palm kernel oil derivative purchases was traced to jurisdictions in Papua New Guinea.

Mill counts are used to quantify the volumes we procure by country and region.

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

Forest risk commodity

Palm oil

Country/Area of origin

Philippines

State or equivalent jurisdiction

Specify state/equivalent jurisdiction
Agusan DeL Sur

% of total production/consumption volume

0.05

Please explain

In 2022 we traced 89% of our 2021 global business palm oil derivative purchases (e.g., priority suppliers providing more than 50MT of volume), achieving a 91% traceability to the origin refiner and a 98% traceability to the mill.

0.05% of our palm oil or palm kernel oil derivative purchases was traced to jurisdictions

in the Philippines.

Mill counts are used to quantify the volumes we procure by country and region.

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

Forest risk commodity

Palm oil

Country/Area of origin

Thailand

State or equivalent jurisdiction

Specify state/equivalent jurisdiction

Chon Buri

% of total production/consumption volume

0.16

Please explain

In 2022 we traced 89% of our 2021 global business palm oil derivative purchases (e.g., priority suppliers providing more than 50MT of volume), achieving a 91% traceability to the origin refiner and a 98% traceability to the mill.

2.73% of our palm oil or palm kernel oil derivative purchases was traced to jurisdictions in Thailand.

Mill counts are used to quantify the volumes we procure by country and region.

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

Forest risk commodity

Palm oil

Country/Area of origin

Thailand

State or equivalent jurisdiction

Specify state/equivalent jurisdiction

Chumphon

% of total production/consumption volume

0.27

Please explain

In 2022 we traced 89% of our 2021 global business palm oil derivative purchases (e.g., priority suppliers providing more than 50MT of volume), achieving a 91% traceability to the origin refiner and a 98% traceability to the mill.

2.73% of our palm oil or palm kernel oil derivative purchases was traced to jurisdictions in Thailand.

Mill counts are used to quantify the volumes we procure by country and region.

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

Forest risk commodity

Palm oil

Country/Area of origin

Thailand

State or equivalent jurisdiction

Specify state/equivalent jurisdiction

Kanchanaburi

% of total production/consumption volume

0.05

Please explain

In 2022 we traced 89% of our 2021 global business palm oil derivative purchases (e.g., priority suppliers providing more than 50MT of volume), achieving a 91% traceability to the origin refiner and a 98% traceability to the mill.

2.73% of our palm oil or palm kernel oil derivative purchases was traced to jurisdictions in Thailand.

Mill counts are used to quantify the volumes we procure by country and region.

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

Forest risk commodity

Palm oil

Country/Area of origin

Thailand

State or equivalent jurisdiction

Specify state/equivalent jurisdiction

Krabi

% of total production/consumption volume

0.44

Please explain

In 2022 we traced 89% of our 2021 global business palm oil derivative purchases (e.g., priority suppliers providing more than 50MT of volume), achieving a 91% traceability to the origin refiner and a 98% traceability to the mill.

2.73% of our palm oil or palm kernel oil derivative purchases was traced to jurisdictions in Thailand.

Mill counts are used to quantify the volumes we procure by country and region.

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

Forest risk commodity

Palm oil

Country/Area of origin

Thailand

State or equivalent jurisdiction

Specify state/equivalent jurisdiction

Nakhon Si Thammarat

% of total production/consumption volume

0.16

Please explain

In 2022 we traced 89% of our 2021 global business palm oil derivative purchases (e.g., priority suppliers providing more than 50MT of volume), achieving a 91% traceability to the origin refiner and a 98% traceability to the mill.

2.73% of our palm oil or palm kernel oil derivative purchases was traced to jurisdictions

in Thailand.

Mill counts are used to quantify the volumes we procure by country and region.

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

Forest risk commodity

Palm oil

Country/Area of origin

Thailand

State or equivalent jurisdiction

Specify state/equivalent jurisdiction

Pattani

% of total production/consumption volume

0.05

Please explain

In 2022 we traced 89% of our 2021 global business palm oil derivative purchases (e.g., priority suppliers providing more than 50MT of volume), achieving a 91% traceability to the origin refiner and a 98% traceability to the mill.

2.73% of our palm oil or palm kernel oil derivative purchases was traced to jurisdictions in Thailand.

Mill counts are used to quantify the volumes we procure by country and region.

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

Forest risk commodity

Palm oil

Country/Area of origin

Thailand

State or equivalent jurisdiction

Specify state/equivalent jurisdiction

Phang-Nga

% of total production/consumption volume

0.05

Please explain

In 2022 we traced 89% of our 2021 global business palm oil derivative purchases (e.g., priority suppliers providing more than 50MT of volume), achieving a 91% traceability to the origin refiner and a 98% traceability to the mill.

2.73% of our palm oil or palm kernel oil derivative purchases was traced to jurisdictions in Thailand.

Mill counts are used to quantify the volumes we procure by country and region.

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

Forest risk commodity

Palm oil

Country/Area of origin

Thailand

State or equivalent jurisdiction

Specify state/equivalent jurisdiction

Phatthalung

% of total production/consumption volume

0.05

Please explain

In 2022 we traced 89% of our 2021 global business palm oil derivative purchases (e.g., priority suppliers providing more than 50MT of volume), achieving a 91% traceability to the origin refiner and a 98% traceability to the mill.

2.73% of our palm oil or palm kernel oil derivative purchases was traced to jurisdictions in Thailand.

Mill counts are used to quantify the volumes we procure by country and region.

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

Forest risk commodity

Palm oil

Country/Area of origin

Thailand

State or equivalent jurisdiction

Specify state/equivalent jurisdiction

Prachuap Khiri Khan

% of total production/consumption volume

0.16

Please explain

In 2022 we traced 89% of our 2021 global business palm oil derivative purchases (e.g., priority suppliers providing more than 50MT of volume), achieving a 91% traceability to the origin refiner and a 98% traceability to the mill.

2.73% of our palm oil or palm kernel oil derivative purchases was traced to jurisdictions in Thailand.

Mill counts are used to quantify the volumes we procure by country and region.

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

Forest risk commodity

Palm oil

Country/Area of origin

Thailand

State or equivalent jurisdiction

Specify state/equivalent jurisdiction

Sakon Nakhon

% of total production/consumption volume

0.05

Please explain

In 2022 we traced 89% of our 2021 global business palm oil derivative purchases (e.g., priority suppliers providing more than 50MT of volume), achieving a 91% traceability to the origin refiner and a 98% traceability to the mill.

2.73% of our palm oil or palm kernel oil derivative purchases was traced to jurisdictions in Thailand.

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

Forest risk commodity

Palm oil

Country/Area of origin

Thailand

State or equivalent jurisdiction

Specify state/equivalent jurisdiction
Samut Sakhon

% of total production/consumption volume

0.05

Please explain

In 2022 we traced 89% of our 2021 global business palm oil derivative purchases (e.g., priority suppliers providing more than 50MT of volume), achieving a 91% traceability to the origin refiner and a 98% traceability to the mill.

2.73% of our palm oil or palm kernel oil derivative purchases was traced to jurisdictions in Thailand.

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

Forest risk commodity

Palm oil

Country/Area of origin

Thailand

State or equivalent jurisdiction

Specify state/equivalent jurisdiction
Samut Songkhram

% of total production/consumption volume

0.05

Please explain

In 2022 we traced 89% of our 2021 global business palm oil derivative purchases (e.g., priority suppliers providing more than 50MT of volume), achieving a 91% traceability to the origin refiner and a 98% traceability to the mill.

2.73% of our palm oil or palm kernel oil derivative purchases was traced to jurisdictions in Thailand.

Mill counts are used to quantify the volumes we procure by country and region.

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

Forest risk commodity

Palm oil

Country/Area of origin

Thailand

State or equivalent jurisdiction

Specify state/equivalent jurisdiction

Surat Thani

% of total production/consumption volume

0.77

Please explain

In 2022 we traced 89% of our 2021 global business palm oil derivative purchases (e.g., priority suppliers providing more than 50MT of volume), achieving a 91% traceability to the origin refiner and a 98% traceability to the mill.

2.73% of our palm oil or palm kernel oil derivative purchases was traced to jurisdictions in Thailand.

Mill counts are used to quantify the volumes we procure by country and region.

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

Forest risk commodity

Palm oil

Country/Area of origin

Thailand

State or equivalent jurisdiction

Specify state/equivalent jurisdiction

Trang

% of total production/consumption volume

0.22

Please explain

In 2022 we traced 89% of our 2021 global business palm oil derivative purchases (e.g., priority suppliers providing more than 50MT of volume), achieving a 91% traceability to the origin refiner and a 98% traceability to the mill.

2.73% of our palm oil or palm kernel oil derivative purchases was traced to jurisdictions in Thailand.

Mill counts are used to quantify the volumes we procure by country and region.

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

Forest risk commodity

Palm oil

Country/Area of origin

Thailand

State or equivalent jurisdiction

Specify state/equivalent jurisdiction

Trat

% of total production/consumption volume

0.11

Please explain

In 2022 we traced 89% of our 2021 global business palm oil derivative purchases (e.g., priority suppliers providing more than 50MT of volume), achieving a 91% traceability to the origin refiner and a 98% traceability to the mill.

2.73% of our palm oil or palm kernel oil derivative purchases was traced to jurisdictions in Thailand.

Mill counts are used to quantify the volumes we procure by country and region.

Accordingly, the percent of total production/consumption volume reported is based on

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

Forest risk commodity

Palm oil

Country/Area of origin

Any other countries/areas

State or equivalent jurisdiction

% of total production/consumption volume

0.21

Please explain

In 2022 we traced 89% of our 2021 global business palm oil derivative purchases (e.g., priority suppliers providing more than 50MT of volume), achieving a 91% traceability to the origin refiner and a 98% traceability to the mill. This includes two countries that are not on the drop-down list:

- Country: Solomon Islands; State or Jurisdiction: Guadalcanal; % of total consumption volume: 0.05%
- Country: Costa Rica; State or Jurisdiction: Puntarenas; % of total consumption volume : 0.16%

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

Forest risk commodity

Palm oil

Country/Area of origin

Colombia

State or equivalent jurisdiction

Specify state/equivalent jurisdiction
Magdalena

% of total production/consumption volume

0.33

Please explain

In 2022 we traced 89% of our 2021 global business palm oil derivative purchases (e.g., priority suppliers providing more than 50MT of volume), achieving a 91% traceability to the origin refiner and a 98% traceability to the mill.

3.28% of our palm oil or palm kernel oil derivative purchases is traced to jurisdictions in Colombia.

Mill counts are used to quantify the volumes we procure by country and region.

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

Forest risk commodity

Palm oil

Country/Area of origin

Guatemala

State or equivalent jurisdiction

Specify state/equivalent jurisdiction
Izabal

% of total production/consumption volume

0.22

Please explain

In 2022 we traced 89% of our 2021 global business palm oil derivative purchases (e.g., priority suppliers providing more than 50MT of volume), achieving a 91% traceability to the origin refiner and a 98% traceability to the mill.

0.77% of our palm oil or palm kernel oil derivative purchases was traced to jurisdictions in Guatemala.

Mill counts are used to quantify the volumes we procure by country and region.

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

Forest risk commodity

Palm oil

Country/Area of origin

Honduras

State or equivalent jurisdiction

Specify state/equivalent jurisdiction

Colon

% of total production/consumption volume

0.33

Please explain

In 2022 we traced 89% of our 2021 global business palm oil derivative purchases (e.g., priority suppliers providing more than 50MT of volume), achieving a 91% traceability to the origin refiner and a 98% traceability to the mill.

0.66% of our palm oil or palm kernel oil derivative purchases was traced to jurisdictions in Honduras.

Mill counts are used to quantify the volumes we procure by country and region.

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

Forest risk commodity

Palm oil

Country/Area of origin

Indonesia

State or equivalent jurisdiction

Specify state/equivalent jurisdiction

Sumatera Selatan

% of total production/consumption volume

4.48

Please explain

In 2022 we traced 89% of our 2021 global business palm oil derivative purchases (e.g., priority suppliers providing more than 50MT of volume), achieving a 91% traceability to the origin refiner and a 98% traceability to the mill.

63.53% of our palm oil or palm kernel oil derivative purchases was traced to jurisdictions in Indonesia.

Mill counts are used to quantify the volumes we procure by country and region.

Accordingly, the percent of total production/consumption volume reported is based on

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

Forest risk commodity

Palm oil

Country/Area of origin

Thailand

State or equivalent jurisdiction

Specify state/equivalent jurisdiction
Ranong

% of total production/consumption volume

0.05

Please explain

In 2022 we traced 89% of our 2021 global business palm oil derivative purchases (e.g., priority suppliers providing more than 50MT of volume), achieving a 91% traceability to the origin refiner and a 98% traceability to the mill.

2.73% of our palm oil or palm kernel oil derivative purchases was traced to jurisdictions in Thailand.

Mill counts are used to quantify the volumes we procure by country and region.

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

F1.5f

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

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

No

Data type

Volume produced/consumed

Metric

Country/Area of origin

State or equivalent jurisdiction

% of total production/consumption volume

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

Comment

We do not produce or consume biofuel from palm oil.

F1.6

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

No

F1.7

(F1.7) Indicate whether you have assessed the deforestation or conversion footprint for your disclosed commodities over the past 5 years, or since a specified cutoff date, and provide details.

Forest risk commodity

Timber products

Have you monitored or estimated your deforestation/conversion footprint?

No, and we do not plan to monitor or estimate our deforestation/conversion footprint in the next two years

Coverage

Reporting deforestation/conversion since a specified cutoff date or during the last five years?

Known or estimated deforestation/ conversion footprint (hectares)

Describe methods and data sources used to monitor or estimate deforestation/ conversion footprint

Forest risk commodity

Palm oil

Have you monitored or estimated your deforestation/conversion footprint?

No, and we do not plan to monitor or estimate our deforestation/conversion footprint in the next two years

Coverage

Reporting deforestation/conversion since a specified cutoff date or during the last five years?

Known or estimated deforestation/ conversion footprint (hectares)

Describe methods and data sources used to monitor or estimate deforestation/ conversion footprint

F2. Procedures

F2.1

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

Yes, forests-related risks are assessed

F2.1a

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

Timber products

Value chain stage

Direct operations
Supply chain

Coverage

Full

Risk assessment procedure

Assessed as part of an established enterprise risk management framework

Frequency of assessment

Annually

How far into the future are risks considered?

1 to 3 years

Tools and methods used

Internal company methods

Other, please specify

Sedex Radar Risk Tool, Risk Methods

Issues considered

Impact of activity on the status of ecosystems and habitats

Regulation

Corruption

Social impacts

Stakeholders considered

Investors

Local communities

NGOs

Regulators

Suppliers

Please explain

Forests-related risks, such as deforestation and high carbon value forests are assessed by documenting specific details from global fiber suppliers for packaging and wipes to understand their sourcing practices, supply chains, and certifications. The supply base for goods and services used in our products is continually monitored via web crawl technologies through a 3rd party monitoring service, where alerts are provided to company buyers and key contacts if any risk issues are uncovered, including those related to environmental or social non-compliance.

Our Environmental, Social, and Governance Sourcing (ESG Sourcing) Team helps assess our upstream supply chain risk against social, ethical, and environmental impacts by implementing auditing and monitoring protocols to verify compliance and minimize the opportunity for negative social, ethical, and environmental impacts.

Utilizing spend data as a precursor, global direct suppliers are reviewed on an annual basis using the SEDEX Radar Tool to conduct an Inherent Risk Assessment of our suppliers' manufacturing sites. The Sedex Radar Tool helps us select suppliers that pose an inherent risk based on region and site location and includes an Environment pillar, which assesses risk factors for Biodiversity, Energy and Climate Change, Waste and Pollution, and Water. We use output data from this process to select sites that pose a high or medium-high risk and require them to undergo a SMETA 4-pillar audit by an APSCA certified third-party auditor.

Auditors check for policies and written procedures along with relevant site managers to understand and record what controls and processes are currently in place to manage environment and or biodiversity. Auditors also check for the presence of systems such

as Chain of Custody, Forest Stewardship Council (FSC), etc. Through our consultant, we work with sites that have non-conformant or non-compliant audit findings against applicable regulations or the Ethical Trade Initiative (ETI) base code through the development of a corrective action plan and closure process by the site(s) to ensure that findings are addressed and closed in a satisfactory manner. Sites that result in a very low audit score are required to undergo a follow-up audit within the subsequent six to twelve months to ensure that the corrective actions have been fully implemented and are fully functional.

Palm oil

Value chain stage

Direct operations
Supply chain

Coverage

Full

Risk assessment procedure

Assessed as part of an established enterprise risk management framework

Frequency of assessment

Annually

How far into the future are risks considered?

> 6 years

Tools and methods used

Internal company methods
Jurisdictional/landscape assessment
Other, please specify
Sphera SCRM, Sedex Radar Risk Tool

Issues considered

Availability of forest risk commodities
Impact of activity on the status of ecosystems and habitats
Regulation
Climate change
Tariffs or price increases
Brand damage related to forests risk commodities
Corruption
Social impacts

Stakeholders considered

Investors
Local communities
NGOs
Regulators
Suppliers



Please explain

Palm-related risks are assessed by documenting details from global palm suppliers to understand their sourcing practices, supply chains, and certifications. The supply base for goods and services used in our products are monitored via web crawl technologies through a 3rd party service; alerts are provided to company buyers and key contacts if any risk issues are uncovered, including those related to environmental or social non-compliance issues. In 2022, we continued working with Earthworm Foundation to develop components and processes to support an effective supply chain grievance mechanism for palm oil. This helps us understand how and where to engage our supply chain to address deforestation, workers’ rights violations, community conflict, and other social and environmental related issues.

Our ESG Sourcing Team helps assess our upstream supply chain risk against social, ethical, and environmental impacts by implementing auditing and monitoring protocols to verify compliance and minimize the opportunity for negative social, ethical, and environmental impacts. Utilizing spend data as a precursor, global direct suppliers are reviewed on an annual basis using the SEDEX Radar Tool to conduct an Inherent Risk Assessment of our suppliers’ manufacturing sites. The Sedex Radar Tool helps us select suppliers that pose an inherent risk based on region and site location, and includes an Environment which assesses risk factors for Biodiversity, Energy and Climate Change, Waste and Pollution, and Water. We use output data from the Inherent Risk Assessment process to select sites that pose a high or medium-high risk and require them to undergo a SMETA 4-pillar audit by an APSCA certified third-party auditor.

Auditors check for policies and written procedures to understand what controls and processes are in place to manage environment and or biodiversity, including systems such as Chain of Custody, Forest Stewardship Council. Through our consultant, we work with sites that have non-conformant or non-compliant audit findings against applicable regulations or the Ethical Trade Initiative (ETI) base code and develop a corrective action plan and closure process ensure findings are addressed and closed in a satisfactory manner. Sites with very low audit scores undergo a follow-up audit to ensure that corrective actions have been implemented and are functional.

F2.2

(F2.2) For each of your disclosed commodity(ies), has your organization mapped its value chains?

	Value chain mapping
Timber products	Yes, we have partially mapped the value chain
Palm oil	Yes, we have partially mapped the value chain

F2.2a

(F2.2a) Provide details of your organization’s value chain mapping for its disclosed commodity(ies).

Forest risk commodity

Timber products

Scope of value chain mapping

Tier 1 suppliers

Tier 2 suppliers

% of total suppliers covered within selected tier(s)

56

Description of mapping process and coverage

We conduct a general mapping process for our Timber value chain. Annually we send out a survey to our direct suppliers of fiber-based packaging and wipes. The survey includes fiber volumes, fiber type (recycled, virgin), certification type (for virgin fiber), country of origin, and jurisdiction. In 2022, 46 of 56 fiber-based packaging suppliers (over 99% of spend) over 99% our fiber-based wipes substrate suppliers by volume responded to the survey. In 2022, we also requested and were able to obtain Tier 2 suppliers for our wipe substrates containing timber-based raw material. Additionally, we periodically visit many of our Kingsford's Tier 1 suppliers, which are typically located in relatively close proximity to our plants in Mississippi, Missouri, Kentucky, Oregon, and West Virginia.

Your own production and primary processing sites: attach a list of facility names and locations (optional)

Your suppliers' production and primary processing sites: attach a list of names and locations (optional)

Forest risk commodity

Palm oil

Scope of value chain mapping

Tier 1 suppliers

Tier 2 suppliers

Tier 3 suppliers

Tier 4+ suppliers

% of total suppliers covered within selected tier(s)

89

Description of mapping process and coverage

In 2022, we mapped 100% of our priority palm oil and palm kernel oil derivative suppliers (e.g., greater than 50 MT) representing 89% of our purchased volume in 2021. We work with Earthworm to map our palm oil and palm kernel oil derivative supply chain. Earthworm uses a number of tools to trace the source of the palm oil we purchase to the country, region, and ultimately to the mill. Earthworm provides a report

with the number of times the raw materials are shipped from the Mill, which is used to calculate the volumes. The tracing was conducted across multiple tier levels (Tier 1 through Tier 5) and includes suppliers, first aggregator/origin refiner and the additional origin refiner allowing us to identify the region/province of the country where our palm derivatives are sourced. In 2021 we achieved a 91% traceability to the origin refiner and a 98% traceability to the mill. Some of our businesses (e.g., Burt's Bees) work with our smaller suppliers to identify the source of their Palm Oil and Palm Kernel Oil derivatives, which increases our overall coverage.

Your own production and primary processing sites: attach a list of facility names and locations (optional)

Your suppliers' production and primary processing sites: attach a list of names and locations (optional)

F2.3

(F2.3) Do you use a classification system to determine risk of deforestation and/or conversion of other ecosystems for your sourcing areas, and if yes, what methodology is used, and what is the classification used for?

Use of a classification system to determine deforestation and/or conversion risk of sourcing areas	
1	No, and we do not plan to in the next two years

F3. Risks and opportunities

F3.1

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

	Risk identified?
Timber products	Yes
Palm oil	Yes

F3.1a

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

Defining and prioritizing substantive Clorox risks is core to the Clorox Enterprise Risk Management (ERM) program and our annual enterprise risk assessment.

Clorox uses both quantitative and qualitative information to define the potential impact of risks.

For example:

- Quantitative definitions include percentage of earnings before income taxes and volatility of Clorox's share price. Given that businesses are not static and experience growth and sometimes contractions, we chose to use a percentage of earnings to identify substantive financial and strategic risks.
- Qualitative definitions address topics such as reputation/brand equity and customer and consumer impacts.

Based on these definitions, we have established a 5-point ERM scale that is used to rate potential risk impacts from very low to very high. A substantive risk is one where the impact is medium to very high across a number of criteria and, if that risk were to materialize, may disrupt our ability to operate our business.

In 2022, Environmental Social Governance (ESG) including climate change remained one of the company's top risks. While the time horizon (i.e., decades) may be longer than other risks, climate change remains a top enterprise risk due to the degree to which it could impact the organization and our operations and the likely significant financial impacts associated with rising global temperatures on our operations, the habits of customers and consumers, and other impacts.

Further, we understand that climate change risks can impact the entire organization over a longer-term horizon, but we act on those risks whether they are considered currently "substantive" today or not. Therefore, we advance climate stewardship goals to mitigate climate-related risks and address climate change as part of the company's overall management strategy. At the corporate level, we identify potential physical, regulatory, reputational, changing consumer trends/awareness and other risk factors associated with climate change, e.g., GHG emissions, energy consumption and water consumption that might not rise to the level of substantive risk. This is accomplished within the cross-functional ESG Core Team and engagement by various internal stakeholders, business units and functional teams as appropriate. This approach helps us proactively manage and mitigate the many aspects of our climate-related risks.

From an ERM perspective, we do not believe that forest-risk commodities pose a substantive risk to our business. We believe our dispersed supply chain affords us redundancy, which mitigates risk to our business from localized events. However, we do believe forest risk commodities pose a strategic risk to our company, its values and its commitment to corporate responsibility. We believe our short and long-term success lies in our focus on driving responsible growth, growth that is not just profitable and sustainable, but also achieved responsibly.

Strategically, we committed to having responsibly sourced or recycled content in the packaging we purchase. Our IGNITE Strategy integrates our business strategy with our ESG goals such as reducing the volume of virgin fiber in our packaging by 2030 and having 100% packaging be reusable, recyclable, or compostable by 2025 (100% R/R/C packaging). At Clorox, addressing deforestation and its impact on climate change is an important aspect of conducting business responsibly.

F3.1b

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

Forest risk commodity

Timber products

Type of risk

Reputational and markets

Geographical scale

Global

Where in your value chain does the risk driver occur?

Supply chain

Primary risk driver

Shifts in consumer preference

Primary potential impact

Reduced demand for products and services

Company-specific description

Clorox is continuing to drive sustainability improvements in our products and packaging through our Ignite ESG goals, which are designed, in part, to address consumer preferences for more sustainable products. These goals include 50% combined reduction in virgin plastic and fiber packaging, doubling post-consumer recycled plastic in packaging by 2030 (+50% by 2025) and having 100% R/R/C packaging by 2025.

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

Timeframe

>6 years

Magnitude of potential impact

Low

Likelihood

Very likely

Are you able to provide a potential financial impact figure?

Yes, an estimated range

Potential financial impact (currency)

Potential financial impact figure - minimum (currency)

700,000

Potential financial impact figure - maximum (currency)

3,500,000

Explanation of financial impact

Our Timber supply chain is mature and the availability of certified virgin material is not an area of high risk or concern at this time. Should availability become an issue, brand reputation could be negatively impacted if there is shortage of certified virgin material. Negative publicity related to issues with our timber supply chain could translate to decreased demand for our products with a resulting decrease in sales. The potential estimated decrease in sales could be in the range of 0.01% to 0.05% of company sales 2022 or \$700,000 to \$3,500,000 .

Primary response to risk

Engagement with suppliers

Description of response

Currently most of our fiber-based packaging we source is made with either recycled or certified virgin fiber, as verified by our annual fiber survey. We engage with suppliers to understand availability and cost implications of certified virgin fiber for our packaging as well as the future outlook of the timber markets in the regions in which we operate and source from. We assess the risk and approach to managing risk in the supply chains of the timber-based materials in our Wipes business and mill wood residuals and by-products in our Kingsford business. This includes but is not limited to ensuring the timber materials used in our wipes and charcoal products are from certified sources or sourced from geographic regions where deforestation risk is low. We monitor our supply base for goods and services that are used in our products via web crawl technologies via a 3rd party service, which alerts buyers and business contacts if any compliance risk issues are reported among our direct suppliers. This allows for swift actions such as shifting sources if needed.

In 2022, approximately 99% of the fiber used in the packaging we purchase meets these criteria, as verified by our annual fiber survey. We are working with our buyers to reverse this trend and plan to incorporate this requirement into our specifications and contracts in the future.

Cost of response

0

Explanation of cost of response

Costs associated with supplier engagement are included in our standard Supplier Relationship Management (SRM) program practiced by our Procurement Team (formerly Global Strategic Sourcing). This ensures awareness of market dynamics and changes that could potentially impact our ability to deliver on our forest commodity commitments. Any response to issues, or necessary changes in supply chain source, are anticipated to be within the scope of responsibilities of existing commodity sourcing managers. As there are no additional costs, the cost of response is \$0 .

This response may contain "forward-looking" statements based on management's

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

Forest risk commodity

Timber products

Type of risk

Regulatory

Geographical scale

Global

Where in your value chain does the risk driver occur?

Supply chain

Primary risk driver

Non-compliance with international law and bilateral agreements

Primary potential impact

Fines, penalties or enforcement orders

Company-specific description

The recent passing of the European Union’s Deforestation Regulation which rules to “guarantee that the products EU citizens consume do not contribute to deforestation or forest degradation” will need to be evaluated for what products Clorox sells into the European Union considered in-scope. The Clorox Company’s Kingsford business is the most likely impacted business, with coal and charcoal deemed to be relevant commodities in the initial texts of the regulation. Due diligence checks and obligations will need to be evaluated and impact to the business is still in process, as the final regulation was only very recently published. The majority of Kingsford sales are in the United States, where EUDR is not applicable. Kingsford’s shipments to Europe are primarily to U.S. Military Bases, which may not be impacted by the rule. Our Procurement teams are still assessing the implications of this new rule but the initial understanding is that the potential impact to both the Kingsford business and the company is likely to be small whereas the cost to respond may be relatively large.

Timeframe

1-3 years

Magnitude of potential impact

Low

Likelihood

Very likely

Are you able to provide a potential financial impact figure?

No, we do not have this figure

Potential financial impact (currency)

Potential financial impact figure - minimum (currency)

Potential financial impact figure - maximum (currency)

Explanation of financial impact

We are in the early stages of assessing the rule and the applicability for Kingsford and our other BUs. The potential financial impact and cost to respond have not been identified and is business confidential.

Primary response to risk

Greater traceability of forest-risk commodities

Description of response

This EUDR requires substantial data for relevant commodities including product, amount, country of origin, geolocation of farm, conclusive and verifiable information that production was deforestation free and in accordance with legislation in country of origin. It is our understanding that the rule does not currently impact the Kingsford or other BUs.

We believe the risk is minimal, Kingsford plants have a strong understanding of their Tier 1 and 2 suppliers, most of which are located in relatively close proximity to our plants (~50 miles). Kingsford has also conducted surveys of suppliers to our Springfield Oregon Plant and found that most source wood covered by the Oregon Forest Protection Act (OFPA). The OFPA offers a certification that is used voluntarily by organizations and consumers of forest products seeking assurances that the wood products they purchase originate from responsibly managed forests. Kingsford does not have detailed traceability data beyond the Tier 2 suppliers or beyond suppliers covered by the OFPA, for timber-based products. Given the by-product and residual nature of our Kingsford timber products and the sheer number and variety of suppliers, supply chain traceability is extremely complex and would likely require satellite monitoring or detailed surveys of the suppliers of relevant materials. The use of these tools would allow us to respond to EU regulation and creates a pathway for compliance.

Cost of response

0

Explanation of cost of response

It is our current understanding that the rule doesn't impact our BUs. However, if this changes, then the BU's will evaluate the cost of geospatial monitoring or conducting surveys and audits for the relevant commodities. Given that the rule is not likely to impact our BUs, we have not calculated a potential financial impact.

Forest risk commodity

Palm oil

Type of risk

Reputational and markets

Geographical scale

Global

Where in your value chain does the risk driver occur?

Supply chain

Primary risk driver

Availability of certified sustainable material

Primary potential impact

Increased operating costs

Company-specific description

We have established commitments that our palm oil ingredients are responsibly sourced. In support of this goal, Clorox is a member of the Roundtable on Sustainable Palm Oil (RSPO) and continues to develop appropriate plans of action in accordance with the framework of the RSPO process, to promote the RSPO and sustainable palm oil production, procurement and consumption. Clorox sources Palm Oil and Palm Kernel Oil derivatives which limits available RSPO sources of 100% Certified Sustainable Palm Oil (CSPO). Directly sourcing only derivative palm ingredients adds complexity and cost to the objective of sourcing only RSPO certified materials.

We continue to work with our existing suppliers and engage new suppliers in an effort to bring availability of competitively priced certified palm ingredients to market. We recognize there is a risk that we may have to pay a premium for palm oil ingredients that meet our requirements. This has the potential to directly impact our operations and our suppliers through increased costs of materials as well as increased indirect costs through additional resource needs to track and assess progress against this goal. There is also a risk to the business that use palm oil derivatives that sufficient volumes of RSPO certified products may not be available for planned production.

Timeframe

4-6 years

Magnitude of potential impact

Medium

Likelihood

About as likely as not

Are you able to provide a potential financial impact figure?

Yes, an estimated range

Potential financial impact (currency)

Potential financial impact figure - minimum (currency)

2,000,000

Potential financial impact figure - maximum (currency)

2,500,000

Explanation of financial impact

The cost impact related to directly sourcing only certified RSPO palm oil has been estimated to be in the range of \$2 million to \$2.5 million USD. This cost is based on the increased in cost to procure RSPO palm derivatives from a supplier multiplied by the volume of palm oil purchased from that supplier. We expect the level of financial impact to decrease in time as Certified Sustainable Palm Oil (CSPO) becomes more widely available in accordance with the RSPO mission to transform markets to make sustainable palm oil the norm.

Primary response to risk

Engagement with suppliers

Description of response

To address this risk, we periodically refine our plan to source 100% RSPO certified palm oil, palm kernel oil and their derivatives by 2025. We continue to monitor supply and to work closely with our suppliers to achieve this commitment. We report annually on our progress against these commitments in this Annual Communication on Progress as well as communication platforms such as our corporate website and other vehicles for disclosing progress on our sustainability/ESG goals. We engage in open dialogue with our suppliers, industry peers, shareholders, nongovernmental organizations and other stakeholders to promote sustainable palm oil supply chains and to strengthen certification and verification mechanisms. In summary, we recognize there is a risk that we may have to pay a premium for palm oil ingredients that meet our requirements

Cost of response

150,000

Explanation of cost of response

The cost to respond is based on costs incurred working with NGO partners, organizational memberships and other support for evaluating our palm supply, along with potential new supplier engagements and new material validations as part of the response associated with this risk.

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

F3.2

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

	Have you identified opportunities?
Timber products	Yes
Palm oil	Yes

F3.2a

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

Forest risk commodity

Timber products

Type of opportunity

Markets

Where in your value chain does the opportunity occur?

Supply chain

Primary forests-related opportunity

Increased demand for certified materials

Company-specific description

Currently around 99% of the fiber-based packaging we source (cartons, corrugates, displays and bags) to be made with either recycled or certified virgin fiber as verified by our annual fiber survey. In 2019 we established a new goal for a 50% combined reduction in virgin plastic and fiber packaging by 2030. This goal is global in nature, and the main opportunities include increased demand for products that come in sustainable packaging, and lower costs by reducing the volume of virgin plastic and fiber. We work with our suppliers to increase capacity in sustainable timber commodities as well as increased recycled content. Our strategy to achieve and maintain these goals is to collaborate with our supply chain partners and raw material suppliers. We report our status and progress as part of our CR communication strategy.

Estimated timeframe for realization

1-3 years

Magnitude of potential impact

Low

Likelihood

More likely than not

Are you able to provide a potential financial impact figure?

Yes, a single figure estimate

Potential financial impact figure (currency)

0

Potential financial impact figure – minimum (currency)

Potential financial impact figure – maximum (currency)

Explanation of financial impact figure

No financial impact is anticipated since this opportunity is part of our overall strategy for ensuring we achieve our goal of having only sustainably sourced, certified virgin or recyclable fiber in our packaging. We currently engage our suppliers to ensure the fiber we purchase meets our requirements. We have assigned a value of \$0 for potential financial impact, understanding that the certification may increase our procurement costs by 2-4% as a cost of doing business. The reduction of virgin fiber and plastic may result in cost savings associated with volume reductions that would offset these increased costs.

Cost to realize opportunity

0

Strategy to realize opportunity

We work with our suppliers to increase capacity in sustainable timber commodities as well as increased recycled content. Our strategy to achieve and maintain these goals is to collaborate with our supply chain partners and raw material suppliers. We report our status and progress as part of our CR communication strategy. This work is part of our IGNITE strategy, we do not identify or disclose a cost to realize.

Forest risk commodity

Palm oil

Type of opportunity

Markets

Where in your value chain does the opportunity occur?

Supply chain

Primary forests-related opportunity

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

Company-specific description

The main opportunity we would derive is increased collaboration with our supply chain partners, increasing transparency and driving demand for increasing capacity in sustainable palm oil commodities. Our approach to identify key points in the supply chain where we can influence change and support transformation activities on the ground. Through our mapping work with our direct suppliers, we annually meet with our

priority suppliers to communicate our sourcing commitments upstream and ensure that our requirements are understood by stakeholders able to influence change on the ground. We also inform our palm suppliers each year of palm commitments. We have made great progress ensuring that our priority suppliers understand our commitment and assist them with creating a policy or commitment if they do not have a public commitment. We continued to support the Earthworm Foundation's Aceh Landscape Program, which advances long-term, landscape-level sustainability transformation in the Indonesian region of Aceh, Sumatra. This program focuses on land-use planning within the highly biodiverse Leuser Ecosystem in Indonesia that allows program members and other participating stakeholders— including local communities, civil society, smallholders, industry and government—to work together to bring about sustainable economic growth while protecting a critical ecosystem. We selected this area as 63% of our palm oil is sourced from Indonesia.

Through the program, we supported multi-stakeholder engagement projects which improved and diversified the livelihoods of more than 2,000 households in forest-frontier communities and strengthened local leadership and entrepreneurship of women and youth. This work is part of our IGNITE strategy, we do not identify or disclose a cost to realize.

Estimated timeframe for realization

1-3 years

Magnitude of potential impact

Low

Likelihood

More likely than not

Are you able to provide a potential financial impact figure?

Yes, an estimated range

Potential financial impact figure (currency)

Potential financial impact figure – minimum (currency)

2,000,000

Potential financial impact figure – maximum (currency)

2,500,000

Explanation of financial impact figure

Based on our current estimated cost premiums to procure 100% certified palm ingredients, the financial impact would translate to a savings of \$2 million to \$2.5 million by eliminating premiums for certified ingredients under an open market scenario. This cost is based on the increased in cost to procure RSPO palm derivatives from a supplier multiplied by the volume of palm oil purchased from that supplier. We expect the level of financial impact to decrease in time as Certified Sustainable Palm Oil (CSPO) becomes more widely available in accordance with the RSPO mission to transform markets to make sustainable palm oil the norm.

Cost to realize opportunity

0

Strategy to realize opportunity

We have made great progress ensuring that our priority suppliers understand our commitment and assist them with creating a policy or commitment if they do not have a public commitment. We continued to support the Earthworm Foundation's Aceh Landscape Program, which advances long-term, landscape-level sustainability transformation in the Indonesian region of Aceh, Sumatra. This program focuses on land-use planning within the highly biodiverse Leuser Ecosystem in Indonesia that allows program members and other participating stakeholders— including local communities, civil society, smallholders, industry and government—to work together to bring about sustainable economic growth while protecting a critical ecosystem. We selected this area as 63% of our palm oil is sourced from Indonesia.

Through the program, we supported multi-stakeholder engagement projects which improved and diversified the livelihoods of more than 2,000 households in forest-frontier communities and strengthened local leadership and entrepreneurship of women and youth. Since this work is part of our IGNITE Strategy and our ESG sourcing structure, we do not identify or disclose a cost to realize.

Forest risk commodity

Palm oil

Type of opportunity

Products & services

Where in your value chain does the opportunity occur?

Supply chain

Primary forests-related opportunity

Increased supply chain transparency

Company-specific description

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

Our strategy to achieve these goals is to partner with Earthworm and collaborate with our supply chain partners and raw material suppliers. We plan to report our progress as part of our Environmental, Social, and Governance communication strategy.

Our approach is to identify key points in the supply chain where we can influence change and support transformation activities on the ground. Through our mapping work

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

Estimated timeframe for realization

4-6 years

Magnitude of potential impact

Low

Likelihood

More likely than not

Are you able to provide a potential financial impact figure?

Yes, a single figure estimate

Potential financial impact figure (currency)

125,000

Potential financial impact figure – minimum (currency)**Potential financial impact figure – maximum (currency)****Explanation of financial impact figure**

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

Cost to realize opportunity

0

Strategy to realize opportunity

Our strategy to achieve these goals is to partner with Earthworm and collaborate with our supply chain partners and raw material suppliers. We plan to report our progress as part of our Environmental, Social, and Governance communication strategy.

Our approach is to identify key points in the supply chain where we can influence change and support transformation activities on the ground. Through our mapping work with our direct suppliers, we will be able to communicate our sourcing commitments upstream and ensure that our requirements are understood by stakeholders able to influence change on the ground. Given Clorox's place downstream in the supply chain, we will be most directly linked to the first importers. We will work closely with them to understand how they are driving change with their direct suppliers in the countries of palm oil production (usually origin refineries). This work is part of our IGNITE strategy, we do not identify or disclose a cost to realize.

F4. Governance

F4.1

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

Yes

F4.1a

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

Position of individual or committee	Responsibilities for forest-related issues
Board-level committee	The full Board of Directors (the “Board”) oversees matters related to environmental, social and governance (ESG) issues as well as targets, standards and other metrics used to measure and track ESG performance and progress. The Board participates in regular (at least annual) updates on ESG topics, including climate, and as part of its enterprise risk management (ERM) oversight role, also oversees the Company’s climate risks, which have been identified as long-term risks for the Company through the Enterprise Risk Assessment process. Pursuant to its charter, the Nominating, Governance and Corporate Responsibility Committee (NGCRC) of the Board, comprised exclusively of independent directors, supports the Board in reviewing, monitoring and engaging with management on the development of climate change and environmental policies, programs, goals and progress. See the 2022 Proxy Statement for additional details.

F4.1b

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

	Frequency that forests-related issues are a scheduled agenda item	Governance mechanisms into which forests-related issues are integrated	Please explain
Row 1	Scheduled - some meetings	Reviewing and guiding business plans Reviewing and guiding corporate responsibility strategy	The full Board participates in regular (at least annual) updates on ESG topics, including climate, and as part of its enterprise risk management (ERM) oversight role, also oversees the Company’s climate risks, which have been identified as long-term risks for the Company through the Enterprise Risk Assessment process. Pursuant to its charter, the Nominating, Governance and Corporate

		<p>Reviewing and guiding major plans of action</p> <p>Reviewing and guiding strategy</p> <p>Other, please specify</p> <p>Monitoring and overseeing progress against ESG goals or targets</p>	<p>Responsibility Committee (NGCRC) of the Board, comprised exclusively of independent directors, supports the Board in reviewing, monitoring, and engaging with management on the development of climate change and environmental policies, programs, goals and progress, and regularly reviewing such matters with the full Board.</p> <p>The NGCRC is updated at least quarterly on ESG-related priorities including those related to Climate. For example, the NGCRC reviews the Company’s progress towards its IGNITE ESG goals, including successes and any challenges along the way. The NGCRC also regularly receives updates on ESG issues of relevance to our stakeholders, including stockholders, which often includes information related to climate risks, oversight and disclosure and the NGCRC (and the full Board) is presented with outside speakers with subject matter expertise and are encouraged to attend director education opportunities, with expenses covered by the Company, for various ESG topics, including climate. See the 2022 Proxy Statement and Financial Statement for additional details.</p>
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F4.1d

(F4.1d) Does your organization have at least one board member with competence on forests-related issues?

Row 1

Board member(s) have competence on forests-related issues

Yes

Criteria used to assess competence on forests-related issues

Clorox’s Governance Guidelines detail the experience and skills that the Nominating, Governance and Corporate Responsibility Committee believes are important in creating a diverse and well-rounded Board. These skills include “expertise on ESG issues, including social responsibility, environmental, climate, sustainability and/or public issues expertise.”

According to our Skills Matrix in our proxy statement, as of the end of last fiscal year, 9 of 12 directors had ESG experience. As we noted in our 2022 Proxy Statement: Our ESG pillars, which we refreshed in fiscal year 2021, are organized around our most strategic opportunities to make positive societal impact and are integrated with our IGNITE strategy. Accordingly, we seek directors with social responsibility, environmental/ climate, sustainability and public issues experience, allowing them to appropriately consider and address business, social and environmental challenges,

while also mitigating risks and creating value for our stakeholders.

One of our directors is also responsible for overseeing sustainability issues at a large, public multinational company. Several board members currently listed on our website come from businesses that have strong commitments around forest stewardship (Bean Suntory, Domino's Pizza, Kellogg, Microsoft, Target).

To enhance and expand on the key skills and experiences relevant to the Company's industry, we provide our directors with continuing education and presentations developed by both internal and external expert speakers. In addition to the regular ESG updates it reviews at each meeting, the NGCRC led a deep-dive session with the full Board on multiple ESG topics presented by management, our external advisers and ESG consultants. Topics included the evolving nature of stakeholder capitalism and interests from our multiple stakeholder groups, emerging proxy voting trends, Clorox's approach to its ESG materiality assessment, which includes Forest as a Tier 2 item, and how that informs its strategic priorities and reporting, among other areas.

F4.2

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

Name of the position(s) and/or committee(s)	Forests-related responsibilities of this position	Frequency of reporting to the board on forests-related issues	Please explain
Chief Executive Officer (CEO)	Managing forests-related acquisitions, mergers, and divestitures Integrating forests-related issues into business strategy Monitoring progress against forests-related corporate targets Managing value chain engagement on forests-related issues Assessing forests-related risks and opportunities	As important matters arise	The CEO, who is a director, is responsible for implementation of the company's ESG strategy, which includes our overall climate strategy. The CEO is directly responsible for approving the company's strategic IGNITE Goals, including, for example, Climate related Science Based Targets and setting a net zero goal. The CEO and the ESG Executive team are responsible for engaging the board on ESG matters including those related to climate change and overseeing the execution of our ESG priorities, ensuring our business strategy considers and optimizes our ESG priorities and our business appropriately provides disclosure around our ESG progress and performance. For example, when Clorox developed our IGNITE Strategy, integrating our ESG Goals with our Business strategy, the CEO was

			<p>responsible for reviewing and approving that integration as head of the organization.</p> <p>The CEO is directly responsible for approving the company's strategic Ignite Goals, including, for example, Forest related goals such as a 50% combined reduction in virgin plastic and fiber packaging and 100% recyclable, reusable, or compostable packaging. The CEO is also tasked with ensuring that there is a team in place, led by the ESG Steering Team (described above) who report to the CEO, to execute the company's climate goals, ensuring that the goals are appropriately set, monitored and tracked and progress is being made.</p>
<p>Other C-Suite Officer, please specify EVP, Chief Legal Officer</p>	<p>Managing major capital and/or operational expenditures, related to low-impact forest products or services (including R&D)</p> <p>Integrating forests-related issues into business strategy</p> <p>Monitoring progress against forests-related corporate targets</p> <p>Managing value chain engagement on forests-related issues</p> <p>Assessing forests-related risks and opportunities</p> <p>Managing forests-related risks and opportunities</p>	<p>As important matters arise</p>	<p>The company's EVP, Chief Legal Officer chairs the ESG Executive Committee which includes Clorox's EVP, Chief People Officer, Group President, Health & Hygiene and Group President, Care and Connection (all Clorox Executive Team Members). The committee is responsible for overseeing the execution of our ESG priorities and ensuring our business strategy considers and optimizes our ESG priorities, including our Climate goals and other ESG commitments, which includes forest. The ESG Executive Committee is tasked with helping to develop and recommend ESG ambitions to the CEO and oversee and assess progress on the ESG goals. The EVP Chief Legal Officer manages our VP and Head of Sustainability. The EVP Chief Legal Officer, as chair of the ESG Executive committee, along with the VP and Head of Sustainability, reports quarterly to the Board's Nominating, Governance and Corporate Responsibility Committee (NGCRC) and to the full board annually, which includes forest-related issues as appropriate.</p>

<p>Other, please specify Head of ERM</p>	<p>Assessing forests-related risks and opportunities</p>	<p>Quarterly</p>	<p>The Company has instituted a robust, comprehensive enterprise risk management program, which involves Board oversight, and an ERM Steering Committee (Steering Committee), which consists of a cross-functional team of senior leaders and key executives. The ERM program oversees the annual key risk identification process, which identifies the top risks that the Company faces with respect to its business, operations, strategy, and other factors, including cybersecurity and climate-related risks, as well as key mitigation strategies and risk owners. The ERM committee, which is overseen by the Chief Financial Officer and Chief Legal Officer, proactively identifies, assesses, prioritizes, and continuously manages enterprise-wide risks, including climate risk which includes water-related issues as appropriate. The Head of ERM provides a quarterly updates to the Board and updates the Board on an annual basis, typically in connection with the Board’s annual strategy meeting.</p>
<p>Other, please specify VP and Head of Sustainability</p>	<p>Managing annual budgets relating to the implementation of forest-related policies and commitments Managing major capital and/or operational expenditures, related to low-impact forest products or services (including R&D) Integrating forests-related issues into business strategy Monitoring progress against forests-related corporate targets</p>	<p>Quarterly</p>	<p>The VP and Head of Sustainability leads an ESG Core Team made up of ESG leaders and subject matter experts from across Clorox and is responsible for engaging a broad set of internal and external stakeholders to ensure we continue as a leader in the ESG space. The Head of Sustainability helps to define and execute on our ESG priorities and guides periodic ESG strategy enhancements. By having a sustainability leader for the core team as well as executive oversight, we’re able to drive accountability and better integrate all aspects of ESG into our business decisions. That means we can have a bigger impact as well as clearer and more consistent messaging for our stakeholders — customers, suppliers, investors, teammates, and more. It also</p>

	<p>Managing value chain engagement on forests-related issues</p> <p>Managing forests-related risks and opportunities</p> <p>Assessing future trends in forest risk commodity demand</p>		<p>ensures we will continue to deliver against our stated ESG goals by representing all the various teams who do this work and formalizing a clear connection to the business units. The Head of Sustainability reports on ESG matters quarterly to the NGCRC and to the full board annually.</p>
<p>Sustainability committee</p>	<p>Managing annual budgets relating to the implementation of forest-related policies and commitments</p> <p>Managing major capital and/or operational expenditures, related to low-impact forest products or services (including R&D)</p> <p>Managing forests-related acquisitions, mergers, and divestitures</p> <p>Providing forests-related employee incentives</p> <p>Integrating forests-related issues into business strategy</p> <p>Managing public policy engagement that may impact forests</p> <p>Managing value chain engagement on forests-related issues</p> <p>Assessing forests-related risks and opportunities</p> <p>Assessing future trends in forest risk commodity demand</p>	<p>Not reported to board</p>	<p>In CY22 the company created an ESG Core Team, which includes owners and subject matter experts from Product Stewardship, R&D, Global Strategic Sourcing, Corporate Governance, Government Affairs/Policy Lead, Climate/Water/Energy Lead, among others. This group provides thought leadership and expertise to business units and leads the measurement, tracking and progress against our ambitious ESG goals. The team reports to the ESG executive team chaired by senior executives.</p> <p>By having a sustainability core team as well as executive oversight, we're able to drive accountability and better integrate all aspects of ESG into our business decisions. That means we can have a bigger impact as well as clearer and more consistent messaging for our stakeholders — customers, suppliers, investors, teammates, and more. It also ensures we will continue to deliver against our stated ESG goals by representing the various teams who do this work and formalizing a clear connection to the business units.</p> <p>The ESG Core Team is supported by various team members and subcommittees with additional expertise around climate, energy, plastic, R&D. These support teams work to inform the Core team who in turn are responsible for</p>

			helping to drive our ESG related goals and commitments, including Climate.
Chief Operating Officer (COO)	<p>Managing major capital and/or operational expenditures, related to low-impact forest products or services (including R&D)</p> <p>Managing forests-related acquisitions, mergers, and divestitures</p> <p>Setting forests-related corporate targets</p> <p>Monitoring progress against forests-related corporate targets</p> <p>Managing value chain engagement on forests-related issues</p> <p>Managing forests-related risks and opportunities</p> <p>Assessing future trends in forest risk commodity demand</p>	As important matters arise	<p>Clorox The EVP, Chief Operating Officer manages and handles the business operations of the company, working closely with the General Managers and the Functional and Operational Leaders to support the daily activities of the organization. The Company operates through business units (BUs) aligned with the Company’s operating segments. Business unit leadership teams, led by VP-General Managers, are responsible for driving the company’s environmental priorities and enabling business units and functions as they more deeply integrate climate and other environmental related risks and opportunities such as water into their own strategies. Clorox’s broader effort includes key members from each BU, subject matter experts across a wide range of functions are tasked with addressing various aspects of managing our ESG related risks and opportunities , including forest, while driving responsible growth.</p>

F4.3

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

	Provide incentives for management of forests-related issues	Comment
Row 1	No, and we do not plan to introduce them in the next two years	The Board's Management Development and Compensation Committee (MDCC) ties ESG-related metrics from our IGNITE scorecard directly to compensation for named executive officers (NEOs). Goals related to ESG metrics from the IGNITE scorecard relevant to each NEO’s role and responsibilities were embedded in each NEO’s fiscal year priorities. The MDCC holistically evaluates NEOs’ performance based on the performance of the business or operations for which each NEO is responsible, including the individual’s contribution to achieving ESG-related goals. IGNITE scorecard results for ESG-related metrics, and

		<p>the NEO’s role in achieving such results, informed the MDCC’s assessment of individual performance and the short-term incentive Individual Multiplier for each NEO.</p> <p>For example, the CEO is responsible overall for the Climate related IGNITE Goals, including meeting Science Based Targets and our Net Zero goals, and is evaluated against these targets. Our 2022 Proxy Statement includes a performance summary that highlights the CEO’s impact on ESG matters: “Clorox maintained strategic focus on delivering its IGNITE strategy, including record-high results on its consumer value metric (CVM) and critical ESG-related progress, such as signing a second virtual power purchase agreement, and gaining approval for science-based targets...”</p> <p>Clorox provides annual incentive awards to our employees under the Annual Incentive Plan (AIP). Consistent with our pay-for-performance philosophy, AIP payouts are determined by a Company Multiplier and an Individual Multiplier. Company performance goals for the AIP are set at the beginning of each fiscal year, based on Board-approved corporate financial performance goals. The Company Multiplier for each fiscal year reflects the level of achievement of those enterprise-level goals. The Individual Multiplier for each executive is based on achievement of individual objectives, also set at the beginning of each fiscal year. Executives’ roles in achieving ESG results are used by their leaders as part of the assessment of individual performance leading to determination of the Individual Multiplier. Integrating ESG goals with our business strategy also affects the Company Multiplier portion of each executive’s incentive payment.</p> <p>Business Unit (BU) leadership incentives are tied to meeting BU-specific ESG goals.</p>
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F4.4

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

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

F4.5

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

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

F4.5a

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

Row 1

Scope

Company-wide




Commodity coverage

General forests policy covering all commodities

Content

Commitment to eliminate conversion of natural ecosystems
Commitment to no deforestation, to no planting on peatlands and to no exploitation (NDPE)
Commitment to protect rights and livelihoods of local communities
Commitments beyond regulatory compliance
Commitment to transparency
Commitment to align with the SDGs
Recognition of the overall importance of forests and other natural ecosystems
Description of business dependency on forests
Recognition of potential business impact on forests and other natural ecosystems
Description of forests-related standards for procurement

Document attachment

-  Responsible-and-Sustainable-Sourcing-Policy-Final-with-Signature-9.9.2021.pdf
-  Sustainable-Sourcing-Standard-Final-MH-JF-with-Signature.pdf
-  Responsible-Sourcing-Standard-Final-with-Signature.pdf

Please explain

We have a strong commitment to ethical business practices; protecting the environment; and treating people with dignity, respect and equal opportunity. We expect the same commitment from business partners and have developed several policies and other documents to clarify how we are working to ensure thriving communities throughout our value chain.

Our Forest Policy is embedded in our Responsible and Sustainable Source Policy which translates our Business Partner Code of Conduct into specific requirements for company and our suppliers. The Policy recognizes the impact deforestation has on climate change, reduced biodiversity, and water scarcity and applies to raw and packaging materials ...that include, but are not limited to, palm oil, timber, pulp and paper, soy, shea, wax, coconut and minerals. The responsible sourcing principals' cover:

- (1) Compliance with environmental, health & safety, labor and social laws and regulations
- (2) Avoidance of deforestation of primary and secondary forests with significant ecological value. This includes "High Carbon Stock" forests and peat lands.
- (3) Protection of biodiversity
- (4) Transparency of sources back to the primary production level
- (5) Avoidance minerals that have been extracted in support of armed conflict

The Policy is accompanied by our Sustainable Sourcing of Raw Material Standard, which states our requirements for the sourcing of raw materials of agricultural or mining origin, and our Responsible Sourcing Standards, which has requirements for the responsible sourcing of our materials, products and services and outlines how we verify that suppliers meet our expectations. These standards, which are all publicly available,

include commodity specific practices for Timber and Palm. It is through these and other policies and standards that show how Clorox is committed to responsible sourcing throughout our value chain. Other aspects of our Forest Policy are found on The Clorox Company Website under Thriving Communities where we spell out Palm Oil and Packaging commitments.

F4.6

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

Forest risk commodity	Public commitments made
Timber products	Yes
	Yes

F4.6a

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

Other, please specify

Earthworm Foundation, the Action for Sustainable Derivatives (ASD), RSPO, AIM Progress, NASPON – NASPON working group to define palm derivative ingredients and best practices on collecting palm data from suppliers and supply chain mapping

F4.6b

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

Forest risk commodity

Timber products

Criteria

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

Operational coverage

Direct operations and supply chain

% of total production/ consumption covered by commitment

100%

Cutoff date

Not applicable

Forest risk countries/areas that the cutoff date applies to

Reason for selecting cutoff date

Commitment target date

2020

Please explain

Our Sustainable Sourcing of Raw Materials Standard, which is referenced by our Responsible and Sustainable Sourcing Policy, has sections that are specific to our commitments around Timber. The standard states that when sourcing raw materials such as palm oil or wood-based fiber for our products and packaging, Clorox is committed to working with suppliers to ensure production does not cause a loss of natural ecosystems or biodiversity, deforestation or human rights infringements, among other environmental or social issues. Our policy states we will avoid deforestation of primary and secondary forests with significant ecological value. This includes “High Carbon Stock” forests and peat lands. Forest related issues, specifically deforestation and biodiversity are also identified as an ESG priority in our 2022 Integrated Annual Report.

We have an ongoing commitment to source only recycled or certified virgin fiber for packaging that we source. In 2022, approximately 99% of the fiber in our packaging that we source was sustainably sourced or recycled content, as verified by our annual fiber survey. We further supported this commitment with an Ignite Goal to achieve 50% combined reduction in virgin plastic and fiber packaging by 2030. In addition, the suppliers of wood used in our Kingsford charcoal business must comply with The Clorox Company’s Business Partner Code of Conduct (or have an internal equivalent code) which states that they must comply with the Lacey Act, which outlines sourcing regulations related to timber products and forest conservation practices.

As an example, in 2020 one of Kingsford’s International customers requested that we provide certifications and wood sourcing details for our charcoal wood sourcing. Our Springfield plant reached out to their customers to confirm that the wood scrap provided to the plant was sourced from areas subject to the state’s Forest Practice Act and FSC/SFI certification sources, which met the provisions of an international standard for responsible forestry. This supply chain mapping exercise was revisited in 2021 and showed that the majority of recycled scrap supply chain at this plant was certified, satisfying a major customer.

Forest risk commodity

Palm oil

Criteria

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

Operational coverage

Direct operations and supply chain

% of total production/ consumption covered by commitment

100%

Cutoff date

Not applicable

Forest risk countries/areas that the cutoff date applies to

Reason for selecting cutoff date

Commitment target date

2021-25

Please explain

Our Sustainable Sourcing of Raw Materials Standard, which is referenced by our Responsible and Sustainable Sourcing Policy, has elements that are specific to Palm ingredients. The standard states that when sourcing raw materials such as palm oil or wood-based fiber for our products and packaging, Clorox is committed to working with suppliers to ensure production does not cause a loss of natural ecosystems or biodiversity, deforestation or human rights infringements, among other environmental or social issues. Our palm commitments in the sourcing standard state:

- We are committed to supporting RSPO standards and its Certified Sustainable Palm Oil (CSPO) to transform practices in the production of palm ingredients.
- We are committed to sourcing only CSPO for palm oil and its derivatives through RSPO physical supply chains by 2025 and reporting on our progress through our RSPO Annual Communication of Progress and other public disclosures.
- Clorox requires that our palm ingredient suppliers and their upstream supply chains fully support our ability to achieve the above commitments.

Suppliers should be able to demonstrate that they comply with the following:

- Demonstrate continuous progress towards fully traceable, responsible palm oil as per General Standards described above.
- Work with Clorox and our partners to establish and maintain traceability of our palm supply chains to first refiner and mill level. Comply with the RSPO Principles and Criteria and source only CSPO through RSPO physical supply chains by 2025.
- Incorporate our commitment criteria in their supplier selection and supply chain management process.
- Have public sustainable palm oil commitments aligned with the RSPO Principles and Criteria, including what is commonly referred to as NDPE (No Deforestation, No Peat and No Exploitation):
 - No deforestation and no development of high conservation value or high carbon stock areas
 - No development on peat lands
 - The protection of human rights, including respect for the rights of indigenous and local communities to give or withhold their free, prior and informed consent to operations

on lands to which they hold legal, communal, or customary rights

- Public grievance process and response procedures for cases of non-compliance

These commitments apply to palm oil ingredients from our key suppliers that we purchase from globally. Our ability to achieve these commitments depends heavily on the changing practices of the palm industry and the future market availability of the palm derivatives used in our products.

Clorox is a member of the Roundtable on Sustainable Palm Oil (RSPO committed to continuing to support RSPO standards and certification as a means to drive Certified Sustainable Palm Oil (CSPO) by 2025. Clorox is a member of the Action for Sustainable Derivatives, an industry-led platform focused on supply chain issues around palm oil and palm kernel oil derivatives. Clorox participated in the ASD Impact Fund, to collectively invest in on-the-ground projects that drive sustainable palm production, supporting the Kaleka Mosaik Initiative.

We provided ongoing support for the Earthworm Foundation's Aceh Landscape Program, which advances long-term, landscape-level sustainability transformation in the Indonesian region of Aceh, Sumatra. The Aceh Landscape — home to the biodiverse Leuser Ecosystem and the Rawa Singkil Wildlife Reserve — is also one of the poorest areas in Indonesia. In 2022 the program supported 369 farmers in 2022 to improve their capacity to manage their farms on good agricultural practices and livelihood diversification including planting corn, chili and banana alongside oil palm. The foundation assisted four companies in Subulussalam district with coaching and training on improved SOPs, employment contracts and conducted participatory mapping and land tenure studies covering 9.498,76 Ha, to identify land claims and conflicts.

F5. Business strategy

F5.1

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

	Are forests-related issues integrated?	Long-term time horizon (years)	Please explain
Long-term business objectives	Yes, forests-related issues are integrated	5-10	Forest related issues are integrated into our long-term business objectives, our strategy, and our financial planning. Our current long-term corporate 2030 Ignite strategy, set in 2019, integrates corporate responsibility objectives with long term business objectives. These include our goal to have 100% of the fiber-based packaging we source (cartons, corrugates, displays and bags) to be made with either recycled or certified virgin fiber, as well as our goal to ensure our palm oil ingredients meet our

			<p>responsible sourcing commitments by and achieve 50% combined reduction in virgin plastic and fiber packaging by 2030 and achieve 100% recyclable, reusable or compostable packaging by 2025.</p> <p>We integrate our Corporate Responsibility strategy and metrics with our long-term business strategy because we believe our short and long-term success lies in our focus on driving responsible growth, growth that is not just profitable and sustainable, but also achieved responsibly. We believe addressing deforestation and its impact on climate change is an important aspect of conducting business responsibly.</p> <p>The Responsible and Sustainable Sourcing Policy was implemented in June of 2021 which includes Responsible Sourcing Standards for suppliers, Sustainable Sourcing Standards for raw material suppliers and Carbon Reduction standards.</p> <p>These are referenced in the Clorox Business Partner Code of Conduct and publicly disclosed on our website.</p>
<p>Strategy for long-term objectives</p>	<p>Yes, forests-related issues are integrated</p>	<p>5-10</p>	<p>Forest related issues are integrated into our long-term business objectives, our strategy, and our financial planning. Our current long-term 2030 Ignite strategy integrates corporate ESG objectives with our long-term business objectives. These include our goal to have all fiber-based packaging we source (cartons, corrugates, displays and bags) to be made with either recycled or certified virgin fiber, as well as our goal to ensure our palm oil ingredients meet our responsible sourcing commitments and achieve 50% combined reduction in virgin plastic and fiber packaging by 2030 and achieve 100% recyclable, reusable or compostable packaging by 2025.</p> <p>Each BU leadership team, led by a VP-General Manager, is responsible for defining and achieving a strategic sustainability plan for its portfolio of brands that will help deliver corporate IGNITE ESG goals and advance its brands towards becoming a sustainable business. Each business unit leadership team designates a sustainability champion to lead its sustainability agenda and monitor progress.</p> <p>We integrate our Corporate Responsibility strategy and metrics with our long-term business strategy because we believe our success lies in our focus on driving growth that is not just profitable and sustainable, but also</p>

			<p>achieved responsibly.</p> <p>Our strategy to minimize the impact of packaging fiber sourcing starts by reducing the amount used. Next, we work to maximize recycled fiber in packaging. When virgin fiber is required, we seek to ensure our suppliers source from sustainable forests and that responsible forestry practices have been followed.</p> <p>Our Kingsford Manufacturing Division uses mill wood residuals and by-products to create charcoal briquettes. We minimize our footprint by not cutting down trees for use in manufacturing.</p> <p>Clorox sources a low volume of palm oil ingredients for its operations, 99% being palm oil or palm kernel oil derivatives, less than 0.003 percent of palm oil produced globally each year. Although our use is small, strategically, we are committed to ensuring our sourcing of palm-derived materials does not contribute to deforestation, peat clearance or infringe upon the rights of workers and indigenous peoples. We believe the most effective way to influence supply chain is through collaboration and partnership with our suppliers, consumer packaged goods peers and nongovernmental organizations.</p>
<p>Financial planning</p>	<p>Yes, forests-related issues are integrated</p>	<p>5-10</p>	<p>Forest related issues are integrated into our long-term business objectives, our strategy, and our financial planning.</p> <p>Our current long-term, 2030 Ignite strategy, set in 2019, integrates corporate ESG objectives with business objectives. These include our goal to have 100% of the fiber-based packaging we source (cartons, corrugates, displays and bags) to be made with either recycled or certified virgin fiber, as well as our goal to ensure our palm oil ingredients meet our responsible sourcing commitments and achieve 50% combined reduction in virgin plastic and fiber packaging by 2030 and achieve 100% recyclable, reusable or compostable packaging by 2025.</p> <p>Resources required to deliver the ESG goals are considered as part of the financial planning process. Financial costs associated with our forest related Ignite Goals, both increases and decreases, are evaluated and included as part of our financial planning processes. For example, reduction of virgin fiber in our packaging might be captured as a cost savings if we can achieve volume reductions or as a cost increase if we have to substitute it with more expensive recycled content. Similarly, our</p>

			<p>financial planning will incorporate costs associated with transitioning to packaging that is 100% reusable, recyclable, or compostable.</p> <p>We integrate our ESG strategy and metrics with our long-term business strategy because we believe our short and long-term success lies in our focus on driving good-growth, growth that is not just profitable and sustainable, but also achieved responsibly. We believe addressing deforestation and its impact on climate change is an important aspect of conducting business responsibly.</p>
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F6. Implementation

F6.1

(F6.1) Did you have any forests-related timebound and quantifiable targets that were active during the reporting year?

Yes

F6.1a

(F6.1a) Provide details of your forests-related timebound and quantifiable target(s) and progress made.

Target reference number

Target 1

Forest risk commodity

Timber products

Year target was set

2011

Target coverage

Company-wide

Target category

Third-party certification

Metric

% of volume third-party certified

Traceability point

Third-party certification scheme

FSC (any type)
PEFC (any type)
SFI Forest Management standard
SFI Chain of Custody
SFI Fiber Sourcing certification

Base year

2012

Base year figure

Target year

2020

Target year figure

100

Reporting year figure

99

% of target achieved relative to base year [auto-calculated]

Target status in reporting year

Underway

Is this target linked to a commitment?

Zero net/gross deforestation

Please explain

We have ongoing commitment to source only recycled or certified virgin fiber for packaging that we purchase directly previously achieved and carried forward from our prior 2020 goal period. In 2022, approximately 99% of the fiber used in the packaging we purchase meets this criterion, based on our annual fiber survey with our direct suppliers. Of this volume, 49% of our fiber-based packaging is from recycled material and 50% is virgin packaging from a certified source (1% is not certified). We estimate that this volume represents packaging used in approximately 90-95% of our global business (NCS \$).

Target reference number

Target 2

Forest risk commodity

Palm oil

Year target was set

2015

Target coverage

Company-wide

Target category

Third-party certification

Metric

% of volume third-party certified

Traceability point

Third-party certification scheme

RSPO (any type)

Base year

2015

Base year figure

0

Target year

2025

Target year figure

100

Reporting year figure

27

% of target achieved relative to base year [auto-calculated]

27

Target status in reporting year

Underway

Is this target linked to a commitment?

Zero net/gross deforestation

Please explain

Our ambition is 100% RSPO by 2025 which is an aggressive goal given that more than 99% of our palm footprint is related to derivatives of palm oil and palm kernel oil. It is our experience that commercial availability of these ingredients does not meet global demand, and the assortment of palm derivatives are not all available from RSPO-certified manufacturers or producers with approximately 19% of global volume being available from certified sources. We are further limited in the use of RSPO-certified sustainable palm derivatives because our Palm Oil Responsible Sourcing Commitment includes many provisions and requirements beyond those set forth in RSPO Principles and Criteria. We established our Palm Oil Responsible Sourcing Commitment in 2015 and believe our responsibility is to source palm-derived ingredients in a manner that

doesn't contribute to deforestation, protects peatlands and respects human rights in our sourcing communities. As a result, we identified specific palm oil production areas within our supply chain and acted on this new information by investing in a landscape-level transformation projects.

For 2022, we have 27% RSPO certified palm derivative ingredients. This was a decrease from 2021, attributed to sourcing of Palm Oil and Palm Kernel Oil derivatives which limits available RSPO sources of 100% CSPO. To address this, we intend to refine our plan to source 100% RSPO certified palm oil, palm kernel oil and their derivatives by 2025. We continue to monitor supply and to work closely with our suppliers to achieve this commitment. We will continue to report annually on our progress against these commitments in this Annual Communication on Progress as well as communication platforms such as our corporate website and other vehicles for disclosing progress on our sustainability/ESG goals. We engage in open dialogue with our suppliers, industry peers, shareholders, nongovernmental organizations and other stakeholders to promote sustainable palm oil supply chains and to strengthen certification and verification mechanisms. In summary, we continue to increase our level of commitment through our actions as we move towards our goal of 100% certified sustainable palm oil.

Target reference number

Target 3

Forest risk commodity

Palm oil

Year target was set

2015

Target coverage

Company-wide

Target category

Traceability

Metric

% of volume traceable to traceability point

Traceability point

Mill

Third-party certification scheme

Base year

2015

Base year figure

0

Target year

2025

Target year figure

100

Reporting year figure

98

% of target achieved relative to base year [auto-calculated]

98

Target status in reporting year

Underway

Is this target linked to a commitment?

Zero net/gross deforestation

Please explain

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

The company's sourcing of palm oil ingredients is limited to approximately 99% derivatives of palm oil or palm kernel oil. Our time-bound action plan outlines key milestones for achieving our 2025 goals and the implementation of our Palm Oil Responsible Sourcing Commitment. Through outreach with our global suppliers — we have made progress against goals and raised awareness of the larger industry challenges involved with sourcing of palm oil derivatives.

In 2022, we traced our 2021 domestic business palm oil derivative purchases, achieving a 91% traceability to the origin refiner and a 98% traceability to the mill. The percent of total production/consumption volume reported represents the number of shipments of palm oil derivatives by our suppliers traced by Earthworm to the applicable jurisdiction. Our aim is to promote increased transparency throughout the industry and moving it toward impactful change on the ground. As a result of our tracing work, we identified specific palm oil production areas within our supply chain and have acted on this information by investing in landscape-level transformation projects since 2017.

Target reference number

Target 4

Forest risk commodity

Timber products

Year target was set

2019

Target coverage

Company-wide

Target category

Other, please specify

Product level

Metric

Other, please specify

Traceability

Traceability point

Third-party certification scheme

Base year

2018

Base year figure

0.75

Target year

2030

Target year figure

0.38

Reporting year figure

0.68

% of target achieved relative to base year [auto-calculated]

18.9189189189

Target status in reporting year

Underway

Is this target linked to a commitment?

Other environmental commitments

Please explain

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

Clorox has an ambitious set of ESG leadership goals integrated with our strategic business choices, as part of its long-term corporate strategy called Ignite. These ESG goals include a 50% combined reduction in virgin plastic and fiber packaging by 2030. In 2018 we calculated that our packaging had 0.75 pounds of plastic or fiber per stat case sold. In 2022, we reduced the volume of plastic or fiber in our packaging to 0.68 pounds per stat case sold. This was achieved by reducing our primary and secondary fiber packaging volumes, compacting our bleach products, and other light-weighting efforts. Overall, this was a 9% improvement over our 2018 baseline toward our 0.38 lbs. per stat case target and we achieved 19% of the target in 2022.

The coverage target includes the plastic and fiber packaging that we purchase for our operationally controlled manufacturing facilities globally, as well as plastic and fiber packaging purchased by contract manufacturers for our domestic businesses. Due to data limitations, it excludes packaging purchased by contract manufacturers for some of our AMEA and Asia businesses

Target reference number

Target 5

Forest risk commodity

Timber products

Year target was set

2019

Target coverage

Company-wide

Target category

Resource use and efficiency

Metric

Other, please specify

Traceability point

Third-party certification scheme

Base year

2018

Base year figure

0.74

Target year

2025

Target year figure

100

Reporting year figure

88

% of target achieved relative to base year [auto-calculated]

87.9105379811

Target status in reporting year

Underway

Is this target linked to a commitment?

Other environmental commitments

Please explain

Climate related risks and opportunities are at the forefront of our decision-making processes to ensure that Clorox remains a leader in corporate responsibility while maintaining Purpose Driven Growth. Clorox has an ambitious set of environmental, social and governance (ESG) leadership goals integrated with our strategic business choices, as part of its long-term corporate strategy called Ignite. These ESG goals include 100% recyclable, reusable, or compostable packaging by 2025. In 2022 we calculated that 88% of our packaging was recyclable, reusable, or compostable, at the material level. The coverage target includes the primary (consumer-facing) packaging. In 2022 we were able to increase the percent of packaging that is reusable, recyclable, or compostable by 14 percentage points versus our 2018 baseline of 74%. Data has been calculated using the Ellen McArthur Foundation’s recyclability assessment tool and the Association of Plastic Recyclers Design Guide for Plastics Recyclability. Recyclability reporting is based on 2022 U.S. domestic, U.S. Export, and LATAM sales data and is estimated to represent global results for this metric. This goal encourages a circular economy by helping to increase the amount of packaging available for reuse/recycling and contributes to fewer GHG emissions associated single-use packaging and landfilling.

F6.2

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

Do you have system(s) in place?	Supply chain coverage	Description of traceability system	Exclusions	Description of exclusion

Timber products	Yes	Volume from direct suppliers only	We conduct annual surveys of our fiber-based packaging and wipes substrate suppliers, including the volume of recycled and certified fiber, and the origin of the fiber. We regularly meet with our suppliers of mill wood residuals and by-products used to make our charcoal as well as wood char for one charcoal product line and understand our sourcing regions to be in the U.S. typically in relatively close proximity to our plants in Mississippi, Missouri, Kentucky, Oregon, and West Virginia. We periodically request certification information from wood by-product suppliers at our Springfield Oregon plant.	Not applicable	
Palm oil	Yes	Volume from direct and indirect suppliers	We engage with a third party to trace our palm derivative ingredients back to the First Refiner and mill in support of our target.	Other, please specify Volume	Excludes lower volume suppliers (<50 MT). In 2022 we traced our 2021 volume,

F6.2a

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

Forest risk commodity	Point to which commodity is traceable	Countries/areas to which this traceability point applies	% of total production/consumption volume traceable
Timber products	Country	Argentina Australia Austria Brazil Canada Chile China Colombia Czechia Estonia	98

		Finland France Germany Hungary Latvia Mexico Norway Peru Philippines Poland Slovakia Slovenia South Africa Spain Sweden Switzerland United Kingdom of Great Britain and Northern Ireland United States of America	
Palm oil	Refinery	Brazil Cambodia Colombia Costa Rica Côte d'Ivoire Ecuador Gabon Ghana Guatemala Honduras Indonesia Liberia Malaysia Nicaragua Panama Papua New Guinea Philippines Solomon Islands Thailand	91.4
Palm oil	Mill	Brazil Cambodia Colombia	98.4

		Costa Rica Côte d'Ivoire Ecuador Gabon Ghana Guatemala Honduras Indonesia Liberia Malaysia Nicaragua Panama Papua New Guinea Philippines Solomon Islands Thailand	
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F6.3

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

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

F6.3a

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

Forest risk commodity

Timber products

Third-party certification scheme

FSC (any type)

Chain-of-custody model used

% of total production/consumption volume certified

33.6

Form of commodity

- Primary packaging
- Secondary packaging
- Tertiary packaging

Volume of production/ consumption certified

47,939

Metric for volume

Metric tons

Is this certified by more than one scheme?

Yes

Please explain

Approximately 99% of the fiber used in packaging we source is from supplier's certified virgin or recycled sources. Across our approximately 142,542 metric tons fiber used in packaging materials we purchased in 2022, approximately 15.9% is SFI certified material, 33.6% is FSC certified material, 0.01% is PEFC certified material, and 1.1% is virgin material that is not certified. The remaining 49.4% is recycled fiber. Schemes include FSC Chain of Custody, FSC Forest Management. This packaging fiber data is based on our annual Fiber Certification Survey with our direct suppliers. We estimate that this volume represents packaging used in approximately 90-95% of our global business (NCS \$). We are continuing to make progress towards reaching our goal of 100% recycled or certified virgin fiber in our packaging. In addition, the suppliers of our timber-based products must comply with The Clorox Company's Business Partner Code of Conduct (or have an internal equivalent code) which states that they must comply with the Lacey Act, which outlines sourcing regulations related to timber products and forest conservation practices.

Forest risk commodity

Timber products

Third-party certification scheme

FSC (any type)

Chain-of-custody model used

% of total production/consumption volume certified

1.1

Form of commodity

- Pulp
- Cellulose-based textile fiber

Volume of production/ consumption certified

110

Metric for volume

Metric tons

Is this certified by more than one scheme?

No

Please explain

Clorox uses wood-based fiber in some of our products, such as Clorox® disinfecting wipes and Clorox® Scentiva® disinfecting wipes. We do not purchase this fiber directly and not all suppliers provide the certification chain of custody.

However, we contacted our suppliers and approximately 97% or 9,820 metric tons of the tree-based material we purchased for our wipes in 2022 is “certifiable” because it comes from certified sources. The reported 110 MT volume is from a wipes supplier that provide documentation for FSC certified fiber for our wipes to Clorox.

Forest risk commodity

Timber products

Third-party certification scheme

SFI Chain of Custody

Chain-of-custody model used

% of total production/consumption volume certified

15.9

Form of commodity

Primary packaging

Secondary packaging

Tertiary packaging

Volume of production/ consumption certified

22,716

Metric for volume

Metric tons

Is this certified by more than one scheme?

Yes

Please explain

Approximately 99% of the fiber we source for our packaging is from supplier’s certified virgin or recycled sources. Across our approximately 142,542 metric tons fiber used in packaging materials we purchased in 2022, approximately 15.9% is SFI certified material, 33.6% is FSC certified material, 0.01% is PEFC certified material, and 1.1% is virgin material that is not certified. The remaining 49.444% is recycled fiber.

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

Forest risk commodity

Timber products

Third-party certification scheme

PEFC (any type)

Chain-of-custody model used

% of total production/consumption volume certified

0.01

Form of commodity

Primary packaging
Secondary packaging
Tertiary packaging

Volume of production/ consumption certified

13

Metric for volume

Metric tons

Is this certified by more than one scheme?

No

Please explain

Approximately 99% of the fiber used in our packaging we source is from supplier's certified virgin or recycled sources. Across our approximately 142,542 metric tons fiber used in packaging materials we purchase, approximately 15.9% is SFI certified material, 33.6% is FSC certified material, 0.01% is PEFC certified material, and 1.1% is virgin material that is not certified. The remaining 49.4% is recycled fiber.

This packaging fiber data is based on our annual Fiber Certification Survey with our direct suppliers. We estimate that this this volume represents packaging used in approximately 90-95% of our global business (NCS \$). We are continuing to make progress towards reaching our goal of 100% recycled or certified virgin fiber in our

packaging. In addition, the suppliers of our timber-based products must comply with The Clorox Company's Business Partner Code of Conduct (or have an internal equivalent code) which states that they must comply with the Lacey Act, which outlines sourcing regulations related to timber products and forest conservation practices.

Forest risk commodity

Palm oil

Third-party certification scheme

RSPO Mass Balance

Chain-of-custody model used**% of total production/consumption volume certified**

27.35

Form of commodity

Palm oil derivatives

Palm kernel oil derivatives

Volume of production/ consumption certified

750

Metric for volume

Metric tons

Is this certified by more than one scheme?

No

Please explain

Clorox's sourcing of palm oil ingredients is limited to 99% derivatives of palm oil and palm kernel oil. Typically present in very small percentages as sub-components of surfactants, fatty alcohols, emulsifiers or fragrances, palm oil derivatives are used in some of our cleaning, food, and natural personal care products. While Clorox's total palm oil ingredient volume represents less than 0.003 percent of palm oil produced globally each year, we are committed to working with our suppliers, other companies and the civic sector to address environmental and social issues in the sector. As part of that effort, Clorox has been an RSPO member since 2016 and supported 2018 updates to the P&Cs, including strengthening commitments to: incorporate the High Carbon Stock Approach (HCSA) to further address deforestation, requirement for no new planting of palm oil on peatlands regardless of depth, and significant improvements to the RSPO P&C with respect to labor rights and practices.

Clorox is now working plans to move to RSPO certified palm material by 2025. We expect to implement a mandatory request for new materials and suppliers to provide RSPO Mass Balance certified materials, and review contracts and supply agreement to

start negotiating the certified volumes for our existing materials to meet our certification objectives. Since Clorox only sources palm derivatives, we recognize our ability to achieve this commitment depends heavily on the changing practices of the palm industry and the future market availability of the palm derivatives used in our products. In addition to certification, we continue partnering with Earthworm Foundation and current suppliers of palm oil ingredients on plans to trace our ingredient supply chain and help to ensure that palm derivative ingredients we source meet our comprehensive responsible sourcing commitments.

Forest risk commodity

Palm oil

Third-party certification scheme

RSPO Segregated

Chain-of-custody model used
% of total production/consumption volume certified

0.07

Form of commodity

Palm oil derivatives

Palm kernel oil derivatives

Volume of production/ consumption certified

2

Metric for volume

Metric tons

Is this certified by more than one scheme?

No

Please explain

Clorox's sourcing of palm oil ingredients is limited to 99% derivatives of palm oil and palm kernel oil. Typically present in very small percentages as sub-components of surfactants, fatty alcohols, emulsifiers or fragrances, palm oil derivatives are used in some of our cleaning, food, and natural personal care products. While Clorox's total palm oil ingredient volume represents less than 0.003 percent of palm oil produced globally each year, we are committed to working with our suppliers, other companies and the civic sector to address environmental and social issues in the sector. As part of that effort, Clorox has been an RSPO member since 2016 and supported 2018 updates to the P&Cs, including strengthening commitments to: incorporate the High Carbon Stock Approach (HCSA) to further address deforestation, requirement for no new planting of palm oil on peatlands regardless of depth, and significant improvements to the RSPO P&C with respect to labor rights and practices.

Clorox is now working plans to move to RSPO certified palm material by 2025. We expect to implement a mandatory request for new materials and suppliers to provide RSPO Mass Balance certified materials, and review contracts and supply agreement to start negotiating the certified volumes for our existing materials to meet our certification objectives. Since Clorox only sources palm derivatives, we recognize our ability to achieve this commitment depends heavily on the changing practices of the palm industry and the future market availability of the palm derivatives used in our products. In addition to certification, we continue partnering with Earthworm Foundation and current suppliers of palm oil ingredients on plans to trace our ingredient supply chain and help to ensure that palm derivative ingredients we source meet our comprehensive responsible sourcing commitments.

F6.4

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

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

F6.4a

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

Forest risk commodity

Timber products

Operational coverage

Supply chain

Description of control systems

We use a few controls to implement our no deforestation commitment. Education for our supply chain and the specific team members. We developed training decks for buyers supporting our supply chain. Our Responsible Sourcing & Sustainability Manager travelled to Kingsford facilities to educate with plant leadership and buyers on our commitment to no deforestation. Suppliers sign our BPCoC which has linked policies. We request suppliers to share our sourcing standards and our BPCoC with their upstream suppliers.

The vast majority of our timber consumption is comprised of wood by-products sourced in the United States, which has strong regulations around forest management,

endangered species protection, and preventing deforestation. We conduct periodic visits to lumber mills, our Tier 1 suppliers, who are generally located close to our plants. We've engaged with our Tier 2 suppliers, lumber companies, confirming that most of the materials are sourced on property that they own and manage.

Monitoring and verification approach

Other, please specify
In-House Responsible Sourcing Team

% of total volume in compliance

Don't know

% of total suppliers in compliance

81-90%

Response to supplier non-compliance

Retain & engage

% of non-compliant suppliers engaged

Don't know

Procedures to address and resolve non-compliance with suppliers

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

Please explain

Adherence to our Business Partner Code of Conduct (BPCOC) is expected for our suppliers. Our BPCOC supports our ESG commitments related to human rights and labor, respectful treatment and equal opportunity, anti-corruption, and environmental sustainability.

When information of any non-compliances in our supply chain occurs, Clorox reviews the details and our supply chain mapping risk analysis tools to understand if the non-compliance touches any part of our supply chain. When needed Clorox notifies our suppliers to request action if the non-compliance is within their supply chain.

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

This commitment and supplier compliance is not only referenced in our contracts but included as a requirement in the Clorox Supplier Onboarding Tool. A digital dashboard for our suppliers that allows us to track compliance with the BPCoC signatory requirements is maintained electronically and updated monthly and is reported to management for any required actions. Through 2022, over 80% of our U.S. business partners by spend have signed or aligned with our BPCOC. We do not track the number of Timber specific suppliers. We have a separate audit process to check compliance with the BPCoC.

Forest risk commodity

Palm oil

Operational coverage

Supply chain

Description of control systems

We perform a risk assessment of direct suppliers, including Palm Oil derivative suppliers for location sites, spend and audit history.

Our Environmental, Social, and Governance Sourcing Team helps assess our upstream supply chain risk against social, ethical, and environmental impacts by implementing auditing and monitoring protocols to verify compliance and minimize the opportunity for negative social, ethical, and environmental impacts. Utilizing spend data as a precursor, global direct suppliers are reviewed on an annual basis using the SEDEX Radar Tool which contains risk data based on independent and reputable sources, to conduct an Inherent Risk Assessment of our suppliers' manufacturing sites.

Specific to palm, we use Earthworm to monitor deforestation risk in our palm oil supply chain. We rely on the Earthworm Foundation for ground monitoring in Indonesia forests where much of our palm is sourced for our ingredients.

Monitoring and verification approach

Ground-based monitoring system

Community-based monitoring

Third-party verification

% of total volume in compliance

91-99%

% of total suppliers in compliance

81-90%

Response to supplier non-compliance

Retain & engage

% of non-compliant suppliers engaged

Don't know

Procedures to address and resolve non-compliance with suppliers

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

Please explain

Adherence to the Clorox Supplier Business Partner Code of Conduct (Code) is required as part of contract template for our suppliers and supports our environmental, social and governance (ESG) commitments related to human rights and labor, respectful treatment and equal opportunity, anti-corruption, and environmental sustainability. Effectively implementing sustainability is a long-held principle of Clorox, and our Code is grounded in international standards and best practices, including the International Labor

Organization (ILO) Declaration on Fundamental Principles and Rights at Work and the Ten Principles of the United Nations Global Compact.

When information of any non-compliances in our supply chain occurs, Clorox reviews the details and our supply chain mapping risk analysis tools to understand if the non-compliance touch any part of our supply chain. When needed Clorox notifies our suppliers to request action if the non-compliance is within their supply chain. We work with suppliers to establish milestones and timelines to resolve the non-compliance. Almost 100% of our Palm suppliers by spend have signed or agreed to our BPCoC. The reported percentages represent the approximate number of Palm derivative suppliers by spend (and by volume for priority suppliers) that have signed the BPCoC, which we are considering in compliance.

F6.6

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

	Assess legal compliance with forest regulations	Comment
Timber products	No, we do not assess legal compliance	We review our suppliers annually to assess risk for third-party auditing. We use a third-party consultant to annually pre-screen all new and current suppliers for risk at supplier locations. Suppliers are segmented by risk level, and high and medium-high risk suppliers are asked to conduct a 4-pillar SMETA audit. Our SMETA audits includes verifying supplier adherence to applicable local laws and regulations (environmental and social) as part of the overall review.
Palm oil	No, we do not assess legal compliance	We review our suppliers annually to assess risk for third-party auditing. We use a third-party consultant to annually pre-screen our new and current suppliers for risk at supplier locations. Suppliers are segmented by risk level, and high and medium-high risk suppliers are asked to conduct a 4-pillar SMETA audit. Our SMETA audits includes verifying supplier adherence to applicable local laws and regulations (environmental and social) as part of the overall review.

F6.7

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

Are you working with smallholders?	Type of smallholder engagement approach	Smallholder engagement approach	Number of smallholders engaged	Please explain

Timber products	Yes, working with smallholders	Supply chain mapping Other	Other, please specify We work with the Earthworm Foundation who engages directly with small landholders with regional partners		We work with suppliers and lumber mills for most of our timber materials, which are wood by-products and scrap. We do not work directly with landholders. We provided ongoing support for the Earthworm Foundation's Aceh Landscape Program, which advances long-term, landscape-level sustainability transformation in the Indonesian region of Aceh, Sumatra. The Aceh Landscape — home to the biodiverse Leuser Ecosystem and the Rawa Singkil Wildlife Reserve — is also one of the poorest areas in Indonesia.
Palm oil	Yes, working with smallholders	Supply chain mapping	Other, please specify we indirectly support independent smallholders		As a member of RSPO, we indirectly support independent smallholders, defined as palm oil smallholders not bound by any contract, credit agreement or planning to a particular palm oil mill. This support covers fair and transparent dealings with Smallholders and improved Smallholder livelihoods. We supported a series of workshops for the smallholders in Indonesia and Malaysia through the



					<p>Business for Social Responsibility.</p> <p>We provided ongoing support for the Earthworm Foundation’s Aceh Landscape Program, which advances long-term, landscape-level sustainability transformation in the Indonesian region of Aceh, Sumatra. The Aceh Landscape — home to the biodiverse Leuser Ecosystem and the Rawa Singkil Wildlife Reserve — is also one of the poorest areas in Indonesia. In 2022 the program supported 369 farmers in 2022 to improve their capacity to manage their farms on good agricultural practices and livelihood diversification including planting corn, chili and banana alongside oil palm. The foundation assisted four companies in Subulussalam district, employing 893 workers, with coaching and training on improved SOPs, employment contracts. They conducted participatory mapping and land tenure studies with eight communities, covering 9.498,76 Ha, to identify land claims and conflicts. Clorox</p>
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					also participated in the ASD Impact Fund, through which we worked with smallholders in the Central Kalimantan, Indonesia – Seruyan and Kotawaring in Barat.
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F6.8

(F6.8) Indicate if you are working with your direct suppliers to drive action on forests-related issues and if so, provide details of the engagement.

Forest risk commodity

Timber products

Are you working with direct suppliers?

Yes, working with direct suppliers

Action(s) on forests-related issues driven by engagement

Ending deforestation and/or conversion of other ecosystems

Type of engagement

Supply chain mapping
Other

Details of engagement

Supplier questionnaires on environmental and social indicators
Other, please specify
Fiber Survey

Description of engagement

Supplier questionnaires on environmental and social indicators

% of suppliers engaged by procurement spend covered by engagement

10

Explain the impact of your engagement on the selected action

We don't currently track the percentage of Timber suppliers that we engage. We estimate that we reach out more than 90% of our suppliers for wipes and packaging but less than 10% of our hog fuel suppliers thru survey's, which is a large number and result in bias low data (10-20% overall). Activities include collecting data in central database

- Encouraging certification
- Encouraging work with multi-stakeholder groups
- Supplier questionnaires on environmental and social indicators.

Is this engagement helping your suppliers engage with their suppliers on the selected action?

Unknown

Does this engagement contribute to achieving a reported target?

No

Forest risk commodity

Palm oil

Are you working with direct suppliers?

Yes, working with direct suppliers

Action(s) on forests-related issues driven by engagement

Ending deforestation and/or conversion of other ecosystems

Type of engagement

Supply chain mapping

Details of engagement

Supplier questionnaires on environmental and social indicators

Description of engagement

A comprehensive risk assessment was performed in 2019, identifying High Impact Suppliers, and will be utilized to engage with high priority suppliers to bring visibility of their supply chains and support landscape level initiatives. We reach out to our palm derivative suppliers annually, to engage on our palm commitment. We further engage priority suppliers on their specific policies, commitments, traceability, etc. Priority suppliers are estimated to represent around 89 percent of our global business palm oil derivative purchases. Activities include:

- Collecting data in central database
- Encouraging certification
- Encouraging work with multi-stakeholder groups-
- Supplier questionnaires on environmental and social indicators-
- Supplier audits-

Meet annually with priority suppliers of palm and are sharing risk data with suppliers as we obtain risk profiles for the various regions of their supply chain

- Communicate routinely with our palm suppliers our commitments and other requirements for certification options.

% of suppliers engaged by procurement spend covered by engagement

80

Explain the impact of your engagement on the selected action

Is this engagement helping your suppliers engage with their suppliers on the selected action?

Yes

Does this engagement contribute to achieving a reported target?

No

F6.9

(F6.9) Indicate if you are working beyond your first-tier supplier(s) to drive action on forests-related issues, and if so, provide details of the engagement.

Forest risk commodity

Timber products

Are you working beyond first tier?

Yes, working beyond first tier

Action(s) on forest-related issues driven by engagement

Ending deforestation and/or conversion of other ecosystems

Type of engagement

Supply chain mapping

Details of engagement

Description of engagement

We publicly recognize the impact deforestation has on climate change, reduced biodiversity, and water scarcity and have set public goals against prioritized commodities in our supply chain that we have determined have greater potential for deforestation risk. For timber, we have goals to source only recycled or certified virgin fiber for packaging and achieve 50% combined reduction in virgin plastic and fiber packaging by 2030. We also monitor other key timber commodities for deforestation risk, including pulp and cellulose fiber in our wipes products, mill wood residuals and by-products, as well as wood char in our charcoal, to determine if they are from certified sources or grown in regions with low deforestation risk. The certification schemes are designed to manage and mitigate deforestation risk beyond our first-tier suppliers.

Explain the impact of your engagement on the selected action

The certification schemes are designed to manage and mitigate deforestation risk beyond our first-tier suppliers.

Does this engagement contribute to achieving a reported target?

No

Forest risk commodity

Palm oil

Are you working beyond first tier?

Yes, working beyond first tier

Action(s) on forest-related issues driven by engagement

Ending deforestation and/or conversion of other ecosystems

Type of engagement

Supply chain mapping

Capacity building

Other

Details of engagement

On-site meetings with indirect suppliers

Supplier audits

Other, please specify

Landscape activities w/NGO partners

Description of engagement

Our approach to meeting our responsible palm oil commitments is rooted in supplier engagement designed to educate our suppliers of derivative ingredients about the issues in palm oil supply chains, encourage and assist as necessary in strengthening their own policies, help in tracing their supply chains back to the mill and subsequently to the plantation, and identifying key points in the supply chain where we can help influence change and support transformation on the ground.

Explain the impact of your engagement on the selected action

Clorox worked through the Earthworm Foundation's Aceh Landscape Program, which advances long-term, landscape-level sustainability transformation in the Indonesian region of Aceh, Sumatra to drive actions on forest-related issues. In 2022 the program supported 369 farmers in 2022 to improve their capacity to manage their farms on good agricultural practices and livelihood diversification including planting corn, chili and banana alongside oil palm. The foundation assisted four companies in Subulussalam district with coaching and training on improved SOPs, employment contracts and conducted participatory mapping and land tenure studies covering 9.498,76 Ha, to identify land claims and conflicts.

Clorox also participated in the ASD Impact Fund, through which we worked with smallholders in the Central Kalimantan, Indonesia . The work includes supporting the certification of more than 1400 smallholder farmers covering up to 4000 hectares of land, replanting of 490 hectares, and encouraging local communities to protect around 6500 hectares of natural forests in their villages by incentivizing the implementation of restorative agriculture in 65 hectares of land. ASD's support of on-the-ground projects is a strategic opportunity to achieve responsible sourcing of palm oil derivatives by generating local transformation and building volumes of sustainable supply.

Does this engagement contribute to achieving a reported target?

No

F6.10

(F6.10) Do you engage in landscape (including jurisdictional) approaches to progress shared sustainable land use goals?

Do you engage in landscape/jurisdictional approaches?	
Row 1	Yes, we engage in landscape/ jurisdictional approaches

F6.10a

(F6.10a) Indicate the criteria you consider when prioritizing landscapes and jurisdictions for engagement in collaborative approaches to sustainable land use and provide an explanation.

	Criteria for prioritizing landscapes/jurisdictions for engagement	Explain your process for prioritizing landscapes/jurisdictions for engagement
Row 1	Commodity sourcing footprint Risk of deforestation, forests/land degradation, or conversion of other natural ecosystems	We selected on-the-ground effort in in Aceh Tamiang, Indonesia, as most of our palm oil is sourced from Indonesia.

F6.10b

(F6.10b) Provide details of your engagement with landscape/jurisdictional approaches to sustainable land use during the reporting year.

Landscape/Jurisdiction ID

LJ1

Country/Area

Indonesia

Name of landscape or jurisdiction area

Aceh Singkil, Subulussalam, Aceh Selatan and Aceh Tenggara

Types of partners engaged in the initiative design and implementation

External consultants

Type of engagement

Funder: Provides full or partial financial support

Goals supported by engagement

Avoided deforestation/conversion of natural ecosystems and/or decreased degradation rate

Promotion of transparency, participation, inclusion, and coordination in landscape policy, planning, and management

Company actions supporting approach

Other, please specify

Support land use planning in the landscape/jurisdiction

Description of engagement

The landscape program in Aceh, Sumatra, Indonesia, is focused on land-use planning within the highly biodiverse Leuser Ecosystem. The landscape boundary is mostly in the western part of the Aceh Province in Sumatra, Indonesia, following district boundaries in most areas. The boundary encompasses most of the Leuser Ecosystem.

The Earthworm Foundation's Aceh Landscape program. There are 20 companies and institutions supporting the program through sponsorship (13) or as field sponsors (7).

The program also engages locally. For example, in 2022 the Aceh Landscape program facilitated the collaboration between 13 stakeholders from public and private sectors civil society to develop a Collective Action Plan in Subulussalam to implement No Deforestation, No Peat, No Exploitation (NDPE) in the district's oil palm sector. The program also completed Participatory Land Use Planning (PLUP) with six communities covering over 30,000 ha of forest. As part of the aim to provide resources and training for smallholder farmers, Earthworm Foundation supported 369 farmers in 2022 to improve their capacity to implement good agricultural practices and livelihood diversification. These key activities help continue to drive progress towards regenerating nature and improving people's lives in the Aceh Landscape.

We provide financial support but we do not disclose the amount. We are a contributor, which is a third level supporter. We participated in the Priority Areas Transformation Steering Committee, with direct input on direction of the implementation of the APT Program and targeting interventions supporting the APT Coalition and other private sector supporters.

The Earthworm Foundation provides an annual report documenting the achievements for the year.

Engagement start year

2019

Engagement end year

Not defined

Estimated investment over the project period (currency)

Is a collective monitoring framework used to measure progress?

Yes, progress is monitored using an internally defined framework

State the achievements of your engagement so far, and how progress is monitored

Key progress in 2021 includes stakeholder support and capacity-building with 8 partnerships; 8,060 ha of protected forest outside concessions; trained almost 590 farmers on Best Management Practices in the landscape, including 55 farmers on Good Agricultural Practices; helped almost 575 workers become full time employees; and mapped 2,749 ha of community land supporting landowners title registration. Additional

details can be found at: <https://www.earthworm.org/our-work/areas-of-work/prosperous-landscapes#target-1>

Landscape/Jurisdiction ID

LJ2

Country/Area

Indonesia

Name of landscape or jurisdiction area

Central Kalimantan

Types of partners engaged in the initiative design and implementation

External consultants

Type of engagement

Funder: Provides full or partial financial support

Goals supported by engagement

Improved community resilience from climate adaptation plans or mitigation efforts
Reliable commodity traceability and landscape monitoring/data collection system(s)

Company actions supporting approach

Other, please specify

Support land use planning in the landscape/jurisdiction

Description of engagement

The landscape program Central Kalimantan is a partnership with the Kaleka Mosaik Initiative. The project is designed protect and restore the landscape while driving sustainable economic growth in two of the largest palm-producing districts in Central Kalimantan, Indonesia – Seruyan and Kotawaringin Barat. This is where ASD member companies' source on average 5%* of their palm derivatives in the region. In Aceh, Sumatra, Indonesia, is focused on land-use planning within the highly biodiverse Leuser Ecosystem. The landscape boundary is mostly in the western part of the Aceh Province in Sumatra, Indonesia, following district boundaries in most areas. The boundary encompasses most of the Leuser Ecosystem.

A partnership with Kaleka (an Indonesia-based non-profit and project implementor).

There are 10 companies supporting the program through sponsorships. Launched with Tides Foundation, the mechanism through which the Impact Fund operates, ASD members intend to provide \$1.5 million to support the Kaleka Mosaik landscape initiative over five years (through 2026).

This includes supporting the certification of more than 1400 smallholder farmers covering up to 4000 hectares of land, replanting of 490 hectares, and encouraging local communities to protect around 6500 hectares of natural forests in their villages by incentivizing the implementation of restorative agriculture in 65 hectares of land. The initiative has two main governance elements that contribute to developing and maintaining sustainable landscapes: jurisdictional certification and sustainable village development. The jurisdictional approach to certification seeks to apply the principles

and criteria of a supply chain certification scheme, in this case the Roundtable for Sustainable Palm Oil (RSPO), to producers of that commodity within a governmental, administrative area, such as a state or district. To support the adoption of sustainable livelihoods among rural communities in Central Kalimantan, two district-wide sustainable village development programs were created in both Kotawaringin Barat (Gawi Bahaum) and Seruyan (Gawi Bapakat).

Engagement start year

2022

Engagement end year

Not defined

Estimated investment over the project period (currency)

Is a collective monitoring framework used to measure progress?

Yes, progress is monitored using an internally defined framework

State the achievements of your engagement so far, and how progress is monitored

In the first year of support, starting in April 2022, the Kaleka Mosaik Initiative met or exceeded its objectives. Key outcomes included:

- Completion of a blueprint document of agri-food business clusters for regional economic development based on community-based agroforestry commodities, designed to provide the roadmap for districts to pursue green development by increasing the value of sustainably produced or harvested crops;
- 500 hectares of forest in one village protected through a social forestry scheme;
- 614 farmers from five villages involved in the certification process (and will undergo an external audit process in June 2023);
- 90 hectares of land replanted in two villages, with 50 hectares multi-cropped with high economic value species;
- 204 forest farmers from five farmer groups in two villages SVLK certified (Timber Legality Verification for sustainable timber); and
- One village (Sapundu Hantu) provided with alternatives to promote fire-free agricultural practices.

Progress is monitored through annual reports, quarterly meetings/updates, and through the ASD positive Social impact Group.

F6.10c

(F6.10c) For each of your disclosed commodities, provide details of the production/consumption volumes from each of the jurisdictions/landscapes you engage in.

Indicate landscape/jurisdiction ID	Does any of your commodity production/consumption volume originate from this landscape/jurisdiction, and	Commodity	% of total production/consumption volume from this landscape/jurisdiction
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	are you able/willing to disclose information on this volume?		
LJ1	Yes, we do produce/consume from this landscape/jurisdiction, but we are not able/willing to disclose volume data		
LJ2	Yes, we do produce/consume from this landscape/jurisdiction, but we are not able/willing to disclose volume data		

F6.11

(F6.11) Do you participate in any other external activities and/or initiatives to promote the implementation of your forests-related policies and commitments?

Forest risk commodity

Timber products

Do you participate in activities/initiatives?

Yes

Activities

Involved in multi-partnership or stakeholder initiatives

Country/Area

United States of America

Subnational area

Not applicable

Initiatives

UN Global Compact

Other, please specify

Sustainable Packaging Coalition

Please explain

In 2015, Clorox became a signatory to the United Nations Global Compact (UNGC), the world’s largest organization that brings companies, NGOs, governments and other stakeholders together to advance the most important sustainability issues in the world as reflected in the organization’s Ten Principles. We report our progress against the Ten Principles annually. Additional details on our progress are presented in our Annual Report, which is available on our website.

As a member of the Sustainable Packaging Coalition, we helped to bring standardized recycling labelling instructions to packaging.

Forest risk commodity

Palm oil

Do you participate in activities/initiatives?

Yes

Activities

Involved in multi-partnership or stakeholder initiatives

Country/Area

Indonesia

Subnational area

Please specify

Aceh

Initiatives

UN Global Compact

Roundtable on Sustainable Palm Oil (RSPO)

Other, please specify

NASPON, Earthworm Foundation, - Aceh Landscape Program (formerly APT - Areas of Priority Transformation)

Please explain

We engage with our suppliers to raise awareness of issues in supply chains, particularly in derivative palm ingredient supply chains. We have invested in partnerships through The Natural Resources Stewardship Circle, Earthworm Foundation, the Action for Sustainable Derivatives (ASD) and AIM-Progress to engage our suppliers and collaborate within industry. In 2021, Clorox was part of the Derivatives Working Group at NASPON (North American Sustainable Palm Oil Network) developing best practices for CPG's purchasing palm oil, including PO and PKO derivatives. In addition, NASPON developed a Segregated Map along with FAQs for brands purchasing palm oil in their supply chain. One other outcome of this team was the creating the Education and Outreach Working Group which developed a vendor survey/evaluation to collect palm oil data for the ACOP (Annual Communication of Palm).

As a member of the Roundtable on Sustainable Palm Oil (RSPO), we are dedicated to the principles and criteria focused on eliminating the negative impact of palm oil cultivation on the environment and communities in palm oil-producing regions.

We work closely with the Earthworm Foundation (EF), a non-profit organization driven to positively impact the relationship between people and nature. Our work with EF is primarily focused on traceability, enhancing our suppliers' commitments and on-the-ground transformation activities within palm oil value chains.

Since 2017 Clorox has supported the Earthworm Foundation Aceh Landscape Program. This program, through the Earthworm Foundation in Indonesia, mobilizes its resources and that of the local partners to support the decoupling of deforestation from supply chains in Aceh, the strengthening of NDPE policies and practices by commercial actors, and improvement of livelihood prospects by communities in the Leuser Ecosystem and

more specifically, the Rawa-Singkil Reserve. Key activities and KPIs are tracked and reported quarterly including government and multi-stakeholder capacity-building and coordination, eliminating deforestation inside palm oil concessions, reducing deforestation by palm oil smallholders, strengthening NDPE practices of plantations and mills, and robust data & monitoring to support interventions and communications.

F6.12

(F6.12) Is your organization supporting or implementing project(s) focused on ecosystem restoration and long-term protection?

No, and we do not plan to implement project(s) within the next two years

F7. Verification

F7.1

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

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

F8. Barriers and challenges

F8.1

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

Forest risk commodity

Timber products

Coverage

Supply chain

Primary barrier/challenge type

Value chain complexity

Comment

Our Kingsford Manufacturing Division uses mill wood residuals and by-products in its manufacturing process to create charcoal briquettes. Due to the by-product nature of this material, mapping and traceability on origin becomes extremely complex. We utilize over 200 suppliers that scavenge forests and mills for remnants and residuals, where wood segregation, traceability and/or certification is rarely available. This type of product accounts for approximately 83% of our total timber consumption. While the large majority of our timber consumption is derived through this complex supply chain, the

vast majority of material is sourced within the United States, which is not considered a high-risk country for deforestation.

Forest risk commodity

Palm oil

Coverage

Supply chain

Primary barrier/challenge type

Limited availability of certified materials

Comment

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

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

- Source CSPO for palm oil and its derivatives through RSPO physical supply chains by 2025.

- Ensure suppliers sourcing palm oil and palm kernel oil in our supply chain have public sustainable palm oil commitments aligned with the RSPO Principles and Criteria, including what is commonly referred to as NDPE (No Deforestation, No Peat and No Exploitation)

- Continue to hold suppliers accountable to the principles outlined in our Business Partner Code of Conduct, including compliance with applicable laws and regulations in the countries of operation, and respect for human rights throughout the value chain.

- Continue mapping, tracing and/or monitoring the supply chain of our palm ingredient suppliers and ensure adherence to Clorox and their own sourcing commitments and practices.

- Continue engaging with our suppliers, industry peers, shareholders, non-governmental organizations and other stakeholders to promote sustainable palm oil supply chains, including collaborations to strengthen certification and verification mechanisms.

- Report annually on our progress against these commitments.

These commitments apply to the palm oil ingredients we purchase globally. Our ability to achieve these commitments depends heavily on the changing practices of the palm industry and the future market availability of the palm derivatives used in our products.

Forest risk commodity

Palm oil

Coverage

Supply chain

Primary barrier/challenge type

Value chain complexity

Comment

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

F8.2

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

Forest risk commodity

Timber products

Coverage

Supply chain

Main measure

Investment in monitoring tools and traceability systems

Comment

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

Forest risk commodity

Palm oil

Coverage

Supply chain

Main measure

Investment in monitoring tools and traceability systems

Comment

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

F17 Signoff

F-FI

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

F17.1

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

	Job Title	Corresponding job category
Row 1	VP-Head of Sustainability	Other, please specify Vice President-Head of Sustainability

Submit your response

In which language are you submitting your response?

English

Please confirm how your response should be handled by CDP

	I understand that my response will be shared with all requesting stakeholders	Response permission
Please select your submission options	Yes	Public

Please confirm below

I have read and accept the applicable Terms