

**Clorox Legal Group Diversity Strategy**

**Our Belief:**

We believe the experiences, skills and insights of people from all types of backgrounds enrich our culture, improve our employees' effectiveness and satisfaction, and ultimately contribute to our performance. We also believe that the overall legal services profession has a significant opportunity to improve diversity and inclusiveness.

**Objective:**

To become a model in diversity and inclusion practices through execution of this strategy, including an annual plan implemented through individual and Legal Group objectives.

**Definition of "Diverse" and "Diversity":**

For the purpose of this strategy, the terms "diverse" and "diversity" refer to traits such as race, gender, sexual orientation, age and physical ability.

**Definition of "Inclusive" and "Inclusion":**

For the purpose of this strategy, the terms "inclusive" and "inclusion" refer to embracing the differences that make us unique individuals — things like diversity, education level, personal experiences, work styles, viewpoints, culture and religious affiliation.

**Retention, Mentoring and Education:**

- Encourage Legal Group members at every level to participate in mentoring relationships to foster skills and career development, which will support retention, including:
  - a) Encourage and identify opportunities for training, education and skill development;
  - b) Encourage development in various areas of the law, operations and functions of the company that help promote an overall understanding of the company's corporate strategy and goals and the Legal Group's strategy and goals; and
  - c) Support inclusiveness and leadership development.
- Support and promote diversity and inclusion education initiatives, which may include workshops, situational awareness training, symposia, speaker series, brown bag lunches or a designated Diversity Education Day.

**Recruiting Internally and Engaging Outside Counsel:**

- Participate in diversity symposia or other forums to identify diverse lawyers and other legal staff and work with diverse individuals within law firms and/or bar associations to provide an opportunity to introduce diverse lawyers and other legal staff to Clorox personnel.
- Encourage Clorox personnel to develop diverse networks that can assist in recruiting efforts and engaging outside counsel.
- Identify relevant associations dedicated to diversity where the Legal Group can post new position(s) and develop a process to ensure new positions are posted with these associations.
- Work with Human Resources to focus on recruiting practices that will result in diverse candidate slates.

**Outside Counsel Communication and Information:**

- Communicate our commitment to diversity to outside law firms and request law firm information on diversity demographics, performance and initiatives, including hours billed by diverse and part-time lawyers staffed on Clorox legal matters. Incorporate this information as part of our evaluation and selection of outside counsel.
- Communicate our commitment to pro bono activities to outside law firms and request information on pro bono activities and hours undertaken by law firms as well as activities and hours of pro bono service provided by individual law firm lawyers to be staffed on Clorox legal matters. Incorporate these criteria into our evaluation in our RFP process.
- Establish opportunities for dialogue with our law firms periodically regarding our respective progress and any issues in connection with our diversity.
- Periodically examine and enhance our diversity information request in RFPs.
- Continue to use RFPs and other methods to find talented, diverse law firms and diverse and part-time lawyers within law firms.
- Identify a process for tracking the Legal Group's spending on and/or hours billed by diverse and part-time lawyers staffed on Clorox legal matters on an ongoing basis.
- Help promote and support the company-wide supplier-diversity program.

**Internships:**

- Look for sponsorship opportunities, including a summer internship for diverse students who have a strong interest in attending law school or have just completed their first year of law school. This may be accomplished through the Corporate INROADS summer internship program or through other programs.
- Maintain a visiting foreign attorney program that enables lawyers to intern at our Buenos Aires Legal Group office.

**Pro-Bono and Community Opportunities:**

- Continue to provide professional legal services without compensation or the expectation of compensation to (a) individuals with limited means, (b) individuals with limited access to legal services, or (c) organizations that qualify as not-for-profit under federal tax law.
- Connect, from time to time, with a local high school in a disadvantaged community to co-develop and staff an educational program on selected areas of the law. These activities may include some educational presentations by Legal Group members in high school classrooms and co-sponsoring a half-day conference on legal careers.
- Encourage and support participation in Clorox's Junior Achievement program and similar outreach programs.

**Networking and Diverse Professional Associations:**

- Identify professional associations dedicated to diversity available to the Clorox Legal Group and share information from these associations within the Legal Group.
- Support membership and participation in key associations that promote diversity.
- Explore ways to collaborate with professional diversity associations to obtain information about diversity best practices.

**Employee Resource Groups:**

- Encourage and support participation and leadership roles for Legal Group members in company employee resource groups.
- Encourage communicating key ideas/points arising out of key employee resource group meetings at department staff meetings.

**Annual Diversity Action Plan:**

- To further our strategy, identify and capture diversity initiatives or tactics to be achieved in the ensuing fiscal year in an Annual Diversity Action Plan, including proposed individual PMP and group scorecard objectives.