

## **SC Johnson Statement on Slavery and Human Trafficking**

For more than a century, S. C. Johnson & Son, Inc. (“SC Johnson”) has been guided by certain basic principles about the people to whom we are responsible and whose trust we want to earn. Chief among these are integrity, responsibility, and respect. We have a zero-tolerance policy for human trafficking or slavery, and we unequivocally support the human rights of our workforce and the workforce of our global suppliers.

In keeping with this commitment, we support the United Nations Declaration of Human Rights, the CGF Social Resolution on Forced Labour, its priority principles, and the International Labour Organization core standards on forced labor, child labor, freedom of association and discrimination. We also support all laws that seek to prevent and eliminate slavery and human trafficking from global supply chains by increasing transparency, including California’s Transparency in Supply Chains Act, Australia’s Modern Slavery Act, the United Kingdom’s Modern Slavery Act, and Canada’s Fighting Against Forced Labour and Child Labour in Supply Chains Act.

These laws require applicable companies to disclose what efforts they make to keep their supply chains free of these human rights violations including slavery and human trafficking. SC Johnson addresses these concerns through our internal standards and policies, our Supplier Code of Conduct, and the practices these standards, policies, and the Code require.

### **Business Structure**

SC Johnson is a leading manufacturer of household cleaning products and products for home storage, air care, pest control, shoe care, and personal care, as well as professional products for surface care, floor care, and skin care applications. Our global supply chain consists of 22 SC Johnson production facilities and 250+ third-party manufacturing sites. Our production sites source raw materials and packaging components from more than 2,000 supplier sites around the world. Our finished goods are sold all over the world in traditional consumer channels, business to business channels, and via ecommerce platforms. SC Johnson conducts its business through various subsidiaries in the countries in which it operates.

### **Supplier Code of Conduct**

SC Johnson’s Supplier Code of Conduct specifies our requirements for our suppliers in four key areas: Human Rights and Labor; Safety, Health and Environment; Sustainability; and Business Ethics.

The Code was developed with consideration for recognized global standards and guidelines including The International Labour Organization’s 1998 Declaration on Fundamental Principles and Rights at Work, The United Nations’ Global Compact and The United Nations’ Universal Declaration of Human Rights. We support the efforts of such organizations that seek to improve working conditions. The SC Johnson Supplier Code of Conduct addresses the following labor and human rights issues, among others:

- Prohibition of forced labor – suppliers must never use forced labor or human trafficking in any form, whether prison, slavery, indentured, bonded or otherwise.

- Minimum age requirement – suppliers must not employ any person below the age of 15 or the national minimum age for employment, whichever is higher. If the minimum age for employment is set at 14 for a particular country in accordance with the International Labour Organization standards, exceptions may be made.
- Compensation and minimum wage requirements – suppliers must provide each employee at least the legally mandated minimum wage.
- Legally mandated benefits – suppliers must provide each employee, at a minimum, all legally mandated benefits.
- Maximum work hours – suppliers must comply with legally mandated work hours.
- Environmental, health and safety requirements – suppliers must have written safety, health and environmental guidelines, comply with local safety, health and environmental laws and regulations, and provide personal protective equipment.
- Immigration/qualified to work laws – suppliers must comply with applicable immigration and related laws to ensure that employees may work in the country where the employees are providing services.

Our Supplier Code of Conduct is available on our website at

<https://www.scjohnson.com/en/stories/a-world-with-more-opportunity/fair-treatment-and-opportunity/supplier-code-of-conduct-all-languages>.

## **How We Verify Compliance**

SC Johnson suppliers must stay up-to-date with best practices and maintain all documentation and records required to demonstrate compliance with the standards in our Supplier Code of Conduct. They also must submit to audits or inspections as required by SC Johnson, and certify their respective compliance with the Code.

Along with our internal processes and supplier-provided information, we partner with Suppliers Ethical Data Exchange (SEDEX) to identify, assess and manage any social or ethical risks in our supply chain. We use independent, third-party audit firms to conduct onsite audits, based upon the SEDEX Member Ethical Trade Audit's 4 pillar protocol. SC Johnson's Supplier Code of Conduct allows us to conduct audits, without prior notice and with either SC Johnson personnel or independent third parties. In addition, we may utilize other data exchange platforms to monitor compliance with our Code or recognize third party audits that have 80% or greater similarity to the SMETA 4 pillar protocol. We also offer an Ethics and Compliance Hotline through which concerns can be reported, including anonymously if desired. The hotline enables any person with a concern about a matter relating to our Supplier Code of Conduct to report it 24 hours a day, seven days a week.

## **Certification**

Major suppliers and contract manufacturers are contractually obligated to comply with the SC Johnson Supplier Code of Conduct. We also intend to continue to increase the portion of our purchases that are contractually subject to the Code. In addition, our purchase orders contain requirements that suppliers must comply with all applicable laws and regulations. Suppliers that have contractually committed to comply with the SC Johnson Supplier Code of Conduct must certify that the goods and services they provide to our company are manufactured in compliance

with those standards, and with all applicable laws and regulations in the jurisdictions where they are produced. We will require re-certification by suppliers on a periodic basis.

### **Internal Accountability and Training**

Doing the right thing and acting with integrity are the personal responsibility of everyone at SC Johnson. Global Procurement leads our efforts to review suppliers using a risk-based approach. Procurement requires that suppliers submit to audits or inspections and certify their compliance with the Code as required. If a supplier fails to comply with any aspect of the Code, we require that the supplier take the appropriate remedial actions. If the issue is serious enough, or if appropriate corrective actions are not taken in a timely fashion, SC Johnson can terminate the relationship with the supplier. SC Johnson expects our workforce to act in a legal and ethical manner consistent with SC Johnson's "[This We Believe](#)" principles, company policies, and applicable laws. On an annual basis, all management employees as well as non-management employees in certain sensitive roles affirm their compliance with our company Standards of Conduct. In addition, we provide targeted training on SC Johnson's Supplier Code of Conduct, our Responsible Sourcing program and Modern Day Slavery legislation and its due diligence requirements to the people accountable for those areas of greatest risk.

### **Modern Slavery Risks**

Through SC Johnson's continued evaluation of our supply chain, we have determined modern slavery risks to be relatively heightened in third-party manufacturing environments. These heightened risks are linked to the prevalence of temporary labor and use of staffing agencies to fill positions in such environments. Geopolitical and socio-economic deterioration can increase these risks.

In response to these heightened risks SC Johnson performs more frequent due diligence activities with respect to our third-party manufacturing suppliers across the globe and particularly in areas which have larger observed migratory workforces in their economy, or those elevated through global events. The results of these due diligence efforts are evaluated with a focus on key indicators of Modern Day Slavery such as recruitment fees and costs, involuntary overtime, detention of worker identification, and freedom of worker movement for targeted remediation and process improvements.

### **Measuring Progress**

Our Global Procurement team monitors and tracks occurrences related to the applicable human rights issues listed above. The process begins by identifying where in our supply chain we have the greatest risk on these items. We utilize a variety of risk factors and inputs to create a risk assessment. Subsequently we complete deeper reviews, including third party audits, on the parts of our supply chain with greater risk profiles. Following this effort, we track the identified issues through remediation. This data is captured in a database and available to the Global Procurement team. In addition, we share periodic updates on our progress with key stakeholders within the company.

## **We All Work Together**

Protecting human rights requires collaboration and transparency at every step. That is an expectation for every SC Johnson employee and supplier, and it is a commitment we work vigorously to protect through our standards, policies and practices. Learn more about what we do and how we do it in our [Sustainability Report](#) and our [Supply Chain Transparency](#) section of our website.