

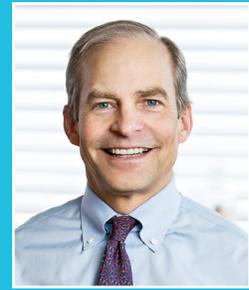


Making Life Better, Together

The SC Johnson Supplier Code of Conduct

Our Commitment

A Letter from our Chairman and CEO



For more than 125 years, SC Johnson has worked to make life better for families around the world. We do this through the innovation and quality of our products, the environmental and social responsibility that guides our actions, and the positive impact we work to have in the communities where we operate.

Fundamental to achieving this goal is our commitment to integrity in all our business activities and interactions. Supporting human rights, adhering to laws and regulations — these are non-negotiable for SC Johnson.

As a family company, there's nothing more important than treating people fairly and with respect, and living up to the expectations of future generations. We are guided by our principles and we expect SC Johnson suppliers to share this commitment to doing what's right.

H. Fisk Johnson, Chairman and CEO

Who Is SC Johnson?

We are a family company that employs people globally and sells products in virtually every country around the world. Our trusted brands include **GLADE**®, **KIWI**®, **OFF!**®, **PLEDGE**®, **RAID**®, **SCRUBBING BUBBLES**®, **SHOUT**®, **WINDEX**® and **ZIPLOC**® in the United States and beyond, as well as **AUTAN**®, **TANA**®, **BAMA**®, **BAYGON**®, **BRISE**®, **KABIKILLER**®, **KLEAR**®, **MR. MUSCLE**® and **RIDSECT**® outside the United States.



Making Life Better, Together

The SC Johnson Supplier Code of Conduct

SC Johnson works every day to produce innovative, high quality products that make life better for families. We strive for excellence and continuous improvement in the workplace. And, we work diligently to uphold our responsibility to the environment and the communities where we operate.

As a leading global corporate citizen, we are committed to delivering on this mission while living up to the principles in *This We Believe*, which outlines our commitment to helping make every place in which the company operates better because we are there. (Read *This We Believe* at www.scjohnson.com/principles.)

The Intent of this Supplier Code of Conduct

SC Johnson believes in making every place where we operate better, because we have been there. Wherever we operate, we are committed to respecting people and supporting universal human rights, adhering to local laws and regulations, contributing positively to our communities, and minimizing our impact on the environment.

Our operations worldwide are guided by these principles and we expect our suppliers, contract manufacturers, contractors, vendors and other business relations and providers of goods or services, collectively, the “suppliers,” to share this ethic and commitment.

This Supplier Code of Conduct, or “Code,” specifies the requirements for SC Johnson suppliers and we require all of our suppliers to comply with it. The Code also sets out aspirations for our longer-term suppliers to be working towards with us. We reserve the right to terminate any contracts and our business relationship with any supplier that does not meet the requirements of this Code.



About the SC Johnson Supplier Code

SC Johnson's Supplier Code of Conduct outlines the company's expectations for its suppliers in four key pillar areas:



Human Rights and Labor



Safety, Health and Environment



Sustainability



Business Ethics

FOUR KEY PILLARS

In establishing this Code, SC Johnson reviewed and considered the principles outlined in recognized standards and guidelines, including:

- The Global Social Compliance Programme Reference Code – <http://www.gscpnet.com/working-plan/step-1-reference-code.html>
- The International Labour Organization's 1998 Declaration on Fundamental Principles and Rights at Work – www.ilo.org/declaration/
- The United Nations' Global Compact – www.unglobalcompact.org/
- The United Nations' Universal Declaration of Human Rights – www.un.org/en/documents/udhr/

We support the efforts of such organizations which seek to improve working and environmental conditions, and we encourage our suppliers to promote these same standards.

SC Johnson is a member of AIM-Progress and the Global Social Compliance Programme (GSCP), collaborations between major consumer goods companies that work toward harmonizing supply chain activities and minimizing the impact on suppliers.

We are partnering with Suppliers Ethical Data Exchange (SEDEX) to identify, assess and manage the social and ethical risk in our supply chain. We intend to focus on the areas of greatest risk and greatest potential benefit. We will work with our suppliers to mitigate these risks.

If a supplier fails to comply with any aspect of the Code, that supplier must immediately advise SC Johnson of the violation and implement immediate corrective actions. SC Johnson reserves the right to terminate any contracts and its business relationship with any supplier that does not meet the requirements of our Code.

Continued on next page.

About the SC Johnson Supplier Code (continued)

Expectations

All SC Johnson suppliers must comply with the SC Johnson Supplier Code of Conduct. We understand that suppliers may have their own rules of conduct, but we expect suppliers to ensure that the SC Johnson Supplier Code is communicated to, and complied with, throughout their supply chain.

We expect that SC Johnson suppliers will maintain the highest standards of conduct and, in alignment with SC Johnson's ethics and commitment, pursue best practices and continuous improvements in the areas addressed by the four pillars.

This means:

- SC Johnson suppliers must comply with all laws and regulations — whether now in place or enacted/modified in the future — that apply to their operations.
- If the Code establishes standards of conduct that are higher or more restrictive than applicable laws and regulations, then compliance with such laws and regulations is not sufficient and suppliers must in addition comply with the Code.
- If SC Johnson and a supplier have a written contract with terms that contain more specific provisions, the Code is not meant to supersede such provisions. To the extent there is any inconsistency between this Code and any other provision of a particular contract, the contract provision will govern and control.
- Suppliers must also stay up-to-date with best practices. We expect that in the pursuit of best practices and continuous improvement, SC Johnson's own business practices and expectations will evolve with changing market conditions, industry practices and other relevant factors. Suppliers are expected to comply with the latest version of the Code that is posted online or otherwise provided directly to suppliers.
- Suppliers must maintain all documentation and records needed to demonstrate compliance with the standards in the Code, and make these documents and records available for SC Johnson or its designated auditors upon request.
- Suppliers must submit to audits or inspections by SC Johnson personnel and/or independent third parties, covering labor and employment practices and the other matters addressed in our Code, with or without prior notice.
- Upon request, suppliers must certify their respective compliance with this Code to SC Johnson.
- Suppliers must comply with all current and future sourcing policies of SC Johnson. See page 8.

Have a Concern?

Supporting human rights and adhering to laws and regulations are fundamental to SC Johnson. If you have a concern about an SC Johnson supplier relating to matters covered in this Code, the best first step would be to talk with your SC Johnson contact.

However, if for any reason you would prefer to report your concern to SC Johnson anonymously, you can do so by calling our Ethics and Compliance Hotline. Your call will be answered by a third-party hotline operator and an interviewer will document the details of your report. The reporting hotline is available 24 hours a day, seven days a week, and is confidential. Issues reported will be forwarded to the SC Johnson Law Department for follow-up.

- For calls in the United States or Canada, you can reach the Ethics and Compliance Hotline at 877-883-6676.
- For calls outside the United States or Canada, go to www.scjohnson.com/SupplyChainTransparency to determine the country-specific number to dial.

Please note that the Ethics and Compliance Hotline is only for use reporting concerns related to the requirements and expectations described in this Code. For any other communication, please use your regular means of contacting the company. The hotline is only for reporting Code-related issues.



OUR STANDARDS

Human Rights and Labor

Fundamental to SC Johnson's *This We Believe* statement of principles is the belief, stated by Herbert F. Johnson, Sr. in 1927, that "The goodwill of people is the only enduring thing in any business. It is the sole substance. The rest is shadow."

This compels us to act with integrity at all times and to respect the dignity of each person as an individual human being who deserves fair treatment and equal opportunity.

We expect that our suppliers share this ethic and promote best practices and continuous improvement in:

- recognition of the rights of individuals
- compensation and benefits
- conditions of employment
- non-discrimination in all aspects of employment

OUR REQUIREMENTS

We have the following requirements for our suppliers:

Complying with Laws

Suppliers are expected to comply with all applicable national and/or local laws and regulations relating to human rights, labor and employment.

Forbidding Discrimination, Harassment and Abuse

Suppliers must not discriminate in employment — including hiring, compensation, advancement, discipline, termination or retirement — on the grounds of race,



caste, gender, gender identity, sexual orientation, color, national origin, age, mental or physical disability, health conditions or diseases, pregnancy, religion, union membership, marital status, veteran status or political opinion/affiliation. No employee shall be subject to any physical, sexual, psychological or verbal harassment or abuse by another employee or anyone acting as an agent of the supplier.

Forbidding Forced Labor

Suppliers must never use forced labor or human trafficking in any form — prison, slavery, indentured, bonded or otherwise.

Forbidding Child Labor

Suppliers must comply with the national minimum age for employment, the age of completion of compulsory education or any other specified exception, and shall not employ any person below the age of 15, whichever is higher. If the local minimum age law is set at 14 years of age in accordance with the International Labour Organization's developing country exceptions, this lower age may be acceptable. However, this exception must be specifically discussed and agreed to by SC Johnson.

Freedom of Association

Suppliers must respect the rights of workers, as allowed by local law, to join or form trade unions of their own choosing and to bargain collectively. Where employees are represented by a legally recognized union or employee representative, Suppliers will act in accordance with local laws.

Complying with Wage and Hour Laws

- *Compensation and Benefits* – Suppliers must meet or exceed legally mandated wage rates and benefits for each employee. Suppliers must, before they enter into employment, provide each employee with written and understandable information about their employment conditions, and may not deduct from worker pay for disciplinary infractions.
- *Hours of Work* – Suppliers must comply with legally mandated work hours and rest periods, use overtime only when each employee is fully compensated according to local law, implement overtime responsibly and inform each employee when mandatory overtime is a condition of employment.



OUR STANDARDS

Safety, Health and Environment

Safety is a non-negotiable priority for SC Johnson, and we expect it to be the same for all our suppliers.

OUR REQUIREMENTS

We have the following requirements for our suppliers:

Suppliers must comply with all applicable national and/or local laws and regulations related to worker safety and protection.

Suppliers also are expected to have a Safety, Health and Environment management system of their own in place that takes adequate steps to prevent accident and injury to health, including:

- Analyzing, investigating and correcting in a timely manner any injury or serious near-miss that occurs, including action to avoid repetition in the future.
- Identifying one experienced leader for Safety, Health and Environment management who oversees training, documented safety analyses and the supply of adequate personal protective equipment to employees.
- Keeping a documented track record of Total Incident Rates, generally following the United States OSHA definition.
- Maintaining a waste management system that avoids contamination of the atmosphere, soil and/or waters.



OUR ASPIRATIONS

In addition, suppliers are expected to:

- Have in place an Occupational Health program that continuously improves working conditions for the supplier's employees, aiming to diminish injuries and medical conditions occurring at work.
- Provide a broadly communicated vision of the supplier's responsibility for its employees' safety and health, as well as environmental management as related to its operations.
- Monitor, control and work to reduce or eliminate waste, emissions and impacts from their operations.

Operating safely around the world every second of every day is one of our most important aspirations, and this is an aspiration we expect every supplier to share.



OUR STANDARDS

Sustainability

At SC Johnson, protecting the environment is an ongoing commitment. We work every day to create winning products, use fewer resources, ensure less waste and serve the greater good.

We have the same expectations of our suppliers and we are committed to working with them to help them minimize any negative environmental impacts arising from their operations.

OUR REQUIREMENTS

We have the following requirements for our suppliers:

Complying with Laws

Suppliers must comply with relevant laws and regulations in their country of operation and meet or exceed international standards for environmental protection.

- *Prevent Banned or Restricted Product Content* – Suppliers must implement programs to ensure that products do not contain restricted or banned materials as directed by local governments or SC Johnson.
- *Maintain Environmental Permits and Reporting* – Suppliers must obtain, maintain and keep current all required environmental registrations and permits – such as discharge monitoring – and follow the operational and reporting requirements of such permits.

Managing Hazardous Materials Appropriately

Suppliers must identify and manage chemicals and other materials that may pose a hazard if released into the environment; ensure sufficient training of workers; ensure safe handling, movement, storage or reuse; and comply with applicable labeling laws and regulations for recycling and disposal.



Suppliers are encouraged to work to continuously improve their environmental performance, and move toward establishing metrics and targets that reduce the environmental impact of their activities.

Managing and Providing Information

Suppliers must maintain detailed and accurate supply chain records and make them available as required. Records must include material sources and any environmental certifications as applicable.

OUR ASPIRATIONS

In addition, suppliers are expected to:

Comply with SC Johnson Sustainable Sourcing Policies

Suppliers must understand and comply with current and future SC Johnson sustainable sourcing policies. These include, but are not limited to pulp, paper, packaging and palm oil responsible sourcing guidelines.

Calculate and Reduce Environmental Footprint

Suppliers are encouraged to calculate their carbon, waste and water footprints using recognized methodologies, such as the Carbon Disclosure Project, and to identify and implement efforts to reduce their footprints.

Commit to Continuous Improvement

Suppliers are encouraged to work to continuously improve their environmental performance, and move toward establishing metrics and targets that reduce the environmental impact of their activities.

Support the Achievement of SC Johnson Environmental Goals

At SC Johnson, we work continuously to improve our environmental footprint. We have established environmental objectives related to increasing the proportion of our ingredients that have a lesser impact on the environment and human health, reducing our carbon footprint, and reducing waste through increased use of post-consumer-recycled content and reduced use of virgin materials in our packaging. We encourage our suppliers to partner with us in advancing our environmental goals.



OUR STANDARDS

Business Ethics

SC Johnson works every day to transact its business in a fair and ethical manner, and to set a high standard of business integrity. We expect the same from suppliers.

Suppliers must comply with all laws and regulations that apply to their operations or activities, whether at the local, national or international level.

OUR REQUIREMENTS

We have the following requirements for our suppliers:

Complying with Anti-Bribery and Anti-Corruption Laws

SC Johnson does not condone, under any conditions, the offering, making or receiving of kickbacks or bribes or any other form of payments that are illegal under applicable law or regulation — including those known as “facilitating payments.” Suppliers must comply with the United States Foreign Corrupt Practices Act of 1977, the United Kingdom Bribery Act 2010 and all other applicable anti-bribery or anti-corruption laws and regulations at a local level. Even where similar laws or regulations do not exist, SC Johnson forbids kickbacks, bribes or improper payments by or to suppliers.

Complying with Antitrust and Competition Laws

Suppliers must comply with all antitrust and competition laws and regulations applicable to their respective operations.

In addition, we have the following SC Johnson-specific requirements related to business ethics:

Avoiding and Disclosing Conflicts of Interest

We define a conflict of interest as any situation involving our business in which there is actual impairment, or a reasonable appearance of impairment, of an SC Johnson employee’s ability to act, objectively and independently, in the best interest of SC Johnson. Suppliers must avoid situations where a conflict of interest may occur and must disclose to SC Johnson any conflict of interest.

We work to treat our customers, consumers, suppliers and other business partners fairly, consistent with sound commercial practices and in compliance with applicable laws and regulations.



For example, this could include a situation in which an employee of the supplier, or an employee’s family member, has a business, family or other relationship with an SC Johnson employee that could influence or affect SC Johnson business with such suppliers or in which an SC Johnson employee has any financial or other interest of any kind in a supplier’s business, or vice versa.

Complying with SC Johnson’s Gift Policy

We believe in fair competition among suppliers for SC Johnson’s business and that sound business decisions are based on objective criteria. In order to ensure that fair competition and objectivity are maintained, SC Johnson has strict internal policies that prohibit SC Johnson employees from accepting any gifts or entertainment, including meals, from outside business associates, regardless of value. Suppliers must observe the SC Johnson policy and not offer or provide any gifts or entertainment to SC Johnson employees.

Additionally, SC Johnson policies prohibit SC Johnson employees from giving gifts or entertainment to suppliers except in limited business circumstances where such gifts and entertainment are of nominal value, and only if such gifts and entertainment are customary in the trade, would not cause the supplier to be obligated, and do not violate policies of the supplier and applicable laws and regulations. SC Johnson employees are prohibited from providing any gifts or entertainment to improperly influence a supplier. Suppliers must inform SC Johnson of any policies that are applicable to the supplier’s practices for accepting gifts and entertainment, and any violation of such policies.

S. C. Johnson & Son, Inc.
Supplier Code of Conduct
AS OF AUGUST 2017

**For further information, please contact
your normal Procurement contact, or:**

SC Johnson Global Procurement
1525 Howe Street
Racine, WI
53403

Phone: 262-260-2000

Website: www.scjohnson.com


A FAMILY COMPANY

Supporting human rights and adhering to laws and regulations are fundamental to SC Johnson. If you have a concern related to the requirements and expectations described in this Code, please call our Ethics and Compliance Hotline. Contact information is on page 5.