DOCUMENT: Slavery and Human Trafficking Policy	DOCUMENT MANAGED BY: Legal and Compliance Team
APPROVED ON: October 28, 2026	**BY:** General Counsel

Slavery and Human Trafficking Policy

I. Introduction/Overview: WD-40 Company, its subsidiaries and branches (collectively, the "Company") is committed to ethical business practices and ensuring that our supply chains are free from human trafficking and modern slavery. We recognize the responsibility to combat modern slavery and human trafficking in all forms and are dedicated to ensuring that our business and supply chain remain free from such practices.

II. Slavery and Human Trafficking Defined and Examples: This policy is primarily based on the UK Modern Slavery Act of 2015 which broadly interprets slavery and servitude in accordance with Article 4 of the European Convention on Human Rights and prohibits all situations where a person or entity knowingly holds another person in slavery or servitude, including forced or compulsory labor. The following are examples of prohibited forced labor situations:

- Debt Bondage: When a worker is compelled to work to repay a debt or loan. It is very common in these cases to find grossly undervalued labor rates, which causes additional debt accumulation, oftentimes accompanied by high interest rates or living expense deductions.
- Retention of Identity Documents: Employers or labor recruiters confiscate workers' passports or identity documents to restrict their freedom of movement and effectively prevent them from leaving their job.
- Fraudulent Recruitment: Employees are recruited to work in specific jobs with commensurate wages and working conditions, but find themselves in entirely different, often exploitative, circumstances.

III. Applicability: This policy applies to: 1) all Company employees; and 2) third-party marketing distributors, manufacturers, agents, suppliers, consultants, service providers, vendors, and other contractors (each a "Supplier" and collectively "Suppliers").

IV. Compliance with Legislation: The Company complies with all anti-slavery and human trafficking laws in the jurisdictions where we conduct business, including the California Transparency in Supply Chains Act and the UK Modern Slavery Act. We also require our Suppliers to adhere to the same standards and take appropriate measures to prevent and address any instances of modern slavery. The Company's compliance-related activities include:

- Risk Assessments: Conducting regular risk assessments to identify and evaluate the risk of modern slavery and human trafficking within our operations and supply chain, including geographical locations, industries, and specific suppliers or business partners where the risk may be higher.
- Due Diligence: Performing due diligence on our Suppliers to ensure they meet our standards for ethical conduct.
- Supplier Certifications: Requiring Suppliers that manufacture or distribute our products to certify their compliance with anti-slavery and human trafficking laws, both initially as a condition of entering into a business relationship with the Company and regularly thereafter, which may include during Company quality audits; and
- Training and Awareness: Providing training to employees and relevant stakeholders to increase awareness of modern slavery risks and to ensure understanding of their role in preventing and reporting any suspected instances of modern slavery and human trafficking.

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V. Reporting and Questions: Employees and Suppliers have an affirmative obligation to report any apparent or suspected violations or circumventions of this policy.

- Internal Reporting: Employees may report by raising the issue with their coach, another leader, a Regional Compliance Officer, or directly to a member of the Global Ethics and Compliance Committee.
- Whistleblower Hotline Reporting: Suppliers and employees who are not comfortable reporting internally should report via the Company's independent, anonymous and secure whistleblower service provider, EQS, at this link. Reporters can use the online form, or report over the phone using the phone number for their specific location. The hotline is available 24/7 in multiple languages for our employees and business partners around the world.

The Company will ensure that appropriate confidentiality measures are taken and will not retaliate against any individual for reporting violations in good faith.

We welcome any comments or questions that you may have regarding the substance and implementation of this policy. Please direct such communications to [INTERNAL USE ONLY].

VI. Enforcement and Consequences of Violations: In addition to the significant reputational damage to the Company, violations of anti-slavery and human trafficking laws may also result in severe civil and criminal penalties for the Company, its employees, and Suppliers. Adherence to this policy will therefore be considered internally in employee performance reviews and externally in supplier evaluation and contract renewal. Employees or Suppliers who are found to have violated such laws or this policy may face disciplinary action, up to and including termination of employment, or suspension or termination of our business contract, respectively.