

# UK Modern Slavery Statement

## WD-40 Company Slavery and Human Trafficking Transparency Disclosure Statement

### WD-40 Company Worldwide Corporate Structure and Supply Chain Relationships

WD-40 Company is a global business, with corporate headquarters in San Diego, California. In addition to its United States domestic operations that also supplies products for markets in North America, Latin America and certain areas within the Asia-Pacific region, WD-40 Company conducts business in international markets through operating subsidiaries located in Australia (WD-40 Company (Australia) Pty. Limited), Canada (WD-40 Company (Canada) Ltd.), China (Wu Di (Shanghai) Industrial Co., Ltd), Mexico (WD-40 Company Mexico, S. de R.L. de C.V.) and the United Kingdom (WD-40 Company Limited). WD-40 Company manages its supply chain operations through each of these subsidiaries under a consistent set of standards, policies and procedures. "Company" as used in this document shall mean WD-40 Company and its subsidiaries.

The Company's supply chain relationships can be divided into two groups:

- Direct suppliers of raw materials for the trade secret concentrate formulation for the Company's products and filling vendors for the supply of finished goods.
- Indirect suppliers of raw materials and components to direct suppliers for the production of finished goods, and service providers using shift-based or temporary workers (e.g., warehousing and hauliers).

For direct suppliers, the Company has established standards and procedures to reinforce our expectations toward social responsibility, including the Company's policies to prevent and eliminate slavery and human trafficking in the Company's supply chain.

For indirect suppliers, the Company employs a contract manufacturing supply chain architecture with strong relationships based on mutual respect and trust. The Company selects and approves suppliers for most raw materials and components, and distribution methods. All suppliers are required to adhere to the Company's compliance standards, and they are subject to verification of compliance and audit. Through this process, the Company believes the risk of slavery and human trafficking at its suppliers is low.

### WD-40 Company Policies and Procedures

The Company believes in and practices a strong set of Corporate Values, foremost among those values are "We value doing the right thing" and "We value making it better than it is today." The Company has approximately 626 global employees in management, sales and support positions. There is no risk of slavery or human trafficking within the Company's own global operations.

While the Company believes the risk of slavery or human trafficking in its supply chain is low, the Company nonetheless has a variety of mechanisms in place to assess and reduce risks in its supply chain, including:

- A Global Company Code of Conduct that addresses matters of corporate responsibility, including labour and workplace conditions.
- Manufacturing audits of the Company's filling vendors.
- A Global QMS (Quality Management System) that includes Non-Conformance monitoring, reporting and correction.

- A Global Distributor and Supplier Code of Conduct that is incorporated into all contracts for the supply of goods and services.
- A Responsible Sourcing Policy that outlines the Company's commitments to responsible sourcing practices and mandatory requirements for our global supply chain partners.
- Risk assessments for consideration of independent third-party audit requirements for supply chain vendors.

The following activities were undertaken during WD-40 Company's fiscal year ended August 31, 2024, regarding slavery and human trafficking in supply chains. These continuing activities have been developed over a number of years. In keeping with the Company's Corporate Value of making it better than it is today, risks associated with slavery and human trafficking in the supply chain are regularly assessed in considering enhancements to the Company's policies and procedures.

### **Policy Additions and Improvements**

In FY24 the Company updated its Distributor and Supplier Code of Conduct to reflect more fully the International Labour Organization (ILO) and United Nations (UN) human rights guidance around Social Responsibility in the supply chain, including provisions regarding forced labour and child labour.

In FY24 the Company also developed a global Responsible Sourcing Policy, a companion policy to the Distributor and Supplier Code of Conduct, that sets forth the Company's expectations and mandatory requirements for our value chain partners regarding our ESG requirements and outlines the Company's commitment to responsible sourcing practices for our suppliers all around the world.

These updated and new policies better reflect globally recognised standards related to social responsibility in the supply chain and articulate the high social standards we set for ourselves as a Company and that are expected from our supply chain partners.

### **Verification, Due Diligence and Risk Assessment**

The Company annually maps all suppliers to identify and assess risks associated with labour practices, utilising the ethical supply chain management tool, Sedex, where possible. In selecting both direct and indirect suppliers, the Company conducts diligence activities to assess those risks and to verify that the supplier operations will comply with the Company's standards as well as applicable anti-slavery and anti-human trafficking laws. The Company uses risk assessment results to determine which suppliers will be subject to audit during the year. The Company utilises global due diligence screening procedures through a third-party vendor to screen all vendors, including suppliers. The purpose of this screening programme is to ensure that none of the Company's vendors are subject to any global restrictive measures (including sanctions, debarment, embargoes, trade prohibitions, etc.) based on prohibited activities, which includes human rights abuses.

### **Audits**

Once supplier relationships have been established, suppliers are subject to regular audits to assure compliance with the Company's standards and applicable laws based on the Company's verification and risk assessment conclusions. Audits may be performed by the Company's Quality Assurance Department personnel or an independent third party. The Company may also rely upon third party audits required by other customers of these vendors.

The Company does not conduct unannounced audits. Where relied upon, some third-party audits may have been unannounced.

## **Certifications**

Terms and conditions for the purchase of goods and services from the Company's direct suppliers provide for certifications of compliance with applicable laws, including anti-slavery and anti-human trafficking laws in the countries in which they are doing business, as well as compliance with the Company's anti-slavery and anti-human trafficking standards included in the Company's Distributor and Vendor Code of Conduct. The Company also requests such certifications from certain indirect suppliers as a prerequisite to selection and approval as supply chain vendors for the Company's products.

## **Accountability**

The Company maintains internal accountability standards and procedures for employees and suppliers who fail to comply with the Company's standards or local anti-slavery and anti-human trafficking laws and regulations. The Company's Code of Conduct requires conduct consistent with the Company's Corporate Values, including standards for fair labour and workplace practices. Supply chain vendors are required to adhere to specific anti-slavery and anti-human trafficking laws and company standards included in the Company's Distributor and Vendor Code of Conduct. Employees are subject to discipline, up to and including termination of employment, for violations of the Company's Code of Conduct. Suppliers are expected to take corrective actions to address non-compliance findings in audits or upon investigation by the Company's Quality Assurance Department. In appropriate circumstances, the Company may terminate a supplier's contract or discontinue orders for goods or services.

## **Training**

In the past fiscal year, all Company employees received annual Code of Conduct training. Quality Assurance Department employees charged with the oversight of supply chain vendors received instruction as to risk assessment protocols, audit standards, and compliance certification requirements.

Approved by the Board of Directors by written resolution dated 28 February 2025 and signed on its behalf by:



William Noble (Mar 12, 2025 11:28 PDT)

Signature

Name: William Noble

Title: Director, WD-40 Company Ltd.

Dated: 12/03/25