

# Code of Conduct

Lead the World in  
Essentials for a Better Life



Cottonelle

Pull-Ups

Neve

Depend

HUGGIES

Poise

Andrex

U  
Kotex

intimus

Kleenex

Scott

Viva

GoodNites

Plenitad

WYPAII

# TABLE OF CONTENTS



 Kimberly-Clark

## MESSAGE FROM MIKE HSU

### OUR CODE PURPOSE

- 04 Our Responsibilities
- 05 Making Good Decisions
- 06 Speaking Up

### OUR PEOPLE

- 10 Valuing Diversity & Inclusion
- 12 Managing Conflict of Interest
- 14 Communicating Externally

### OUR FINANCIAL INTEGRITY

- 18 Maintaining Strong Internal Controls
- 20 Choosing Business Partners Carefully
- 21 Trading Securities Ethically
- 22 Protecting Information

### OUR CONSUMERS AND OPERATIONS

- 28 Competing Fairly
- 30 Interacting with Government Officials
- 32 Preventing Corruption & Bribery
- 33 Giving or Receiving Business Gratuities
- 34 Doing Business Globally
- 36 Marketing & Advertising Responsibly

### OUR ENVIRONMENT, SAFETY, AND COMMUNITY

- 40 Committing to Sustainability
- 42 Ensuring Workplace Safety
- 44 Delivering Product Quality
- 46 Engaging Suppliers

## INDEX

CODE OF CONDUCT

# MESSAGE FROM MIKE HSU



I want every employee to always be proud to work for Kimberly-Clark and proud of our reputation for high ethical standards.



Accountable

Authentic

Caring

Innovative

From our founding in 1872, Kimberly-Clark has been based on the same shared K-C values. Our commitment to these values has enabled us to lead the world in essentials for a better life. Every day, we are dedicated to living these values and inspiring those around us to experience more of what is essential to them.

Just as our products are essential to our consumers, our Code of Conduct is vital to our continued success and reputation. Our Code guides us in making the right decisions for K-C and fostering a culture of integrity. I ask that you consult it regularly, ask questions, and raise any concerns you might have. I want you to feel comfortable speaking up and encouraging others to speak up as well. We do not tolerate any form of retaliation.

Thank you for living our shared K-C values every day and doing your part to sustain K-C's legacy.

CODE OF CONDUCT

# OUR CODE PURPOSE




## Since 1872, our values have been woven into the fabric of our company.

Living our authentic value means that we continue our heritage of honesty, integrity, and courageously doing the right thing. Part of being authentic is speaking up, asking questions, and raising concerns when we need guidance. Speaking up is not always easy – it often takes courage. You have my personal word that retaliation is never tolerated. Our willingness to speak up is critical to our shared commitment to protecting K-C and operating with integrity around the world.



Jeff Melucci, SVP and General Counsel



Our Responsibilities  
Making Good Decisions  
Speaking Up

# OUR RESPONSIBILITIES

## EMPLOYEES' RESPONSIBILITIES

Our Code is a reference guide to support your day-to-day decision-making. It provides a framework and an introduction to K-C policies – not the full policies themselves. The most current version of the Code is on the Ethics & Compliance Homepage. Full policies and other guidance are on @K-C.

- **Be aware** of the potential risks that are relevant to your job responsibilities and location
- **Be knowledgeable** of the Code and learn the details of any policy that is relevant to your role
- **Be committed** to following the Code and promptly asking questions or raising concerns about potential issues so we can address them



### Applicability

Our Code applies to all K-C employees and our Board of Directors.

This includes all subsidiaries and affiliates controlled by K-C.

The Code is important to who we are as a company, and we are all required to follow it. Violations may result in disciplinary action, including dismissal.



## LEADERS' RESPONSIBILITIES

Leaders are accountable for creating a culture of integrity where employees understand their responsibilities and feel comfortable speaking up without fear of retaliation. The way leaders make decisions and handle concerns builds trust with our teams, customers, and stakeholders.

- **Be aware** of the example you set and how you model our K-C values and behaviors
- **Be knowledgeable** of the messages you send-reinforce that no business result is ever worth compromising our integrity and that you will always listen, especially if there is bad news
- **Be committed** to communicating the importance of ethics and compliance and reviewing key performance measures to drive accountability

## MAKING GOOD DECISIONS

### OUR INDIVIDUAL DECISIONS DEFINE WHO WE ARE AS A COMPANY

We make decisions that we are proud of and that reflect our K-C values. While the Code will not tell you exactly what to do in every situation, use this three-part decision framework to guide you when the answer might not be clear.

1. **Be aware.** Is the potential decision consistent with K-C values and our Code?
2. **Be knowledgeable.** Do I have enough information to make a decision?
3. **Be committed.** Would I be comfortable explaining my decision to my family? Am I willing to be held accountable for it?

**If the answer is "no," or you are not sure, seek guidance before taking action.**

## SPEAKING UP

### HOW TO ASK A QUESTION OR RAISE A CONCERN

Speaking up should be as easy as possible. We understand that you might be uncomfortable or hesitant. That is why there are a variety of ways to tell us when you have a question or concern. You do not need to have all the details, or be certain that something is wrong, when asking a question or raising a concern.

**Generally, your team leader will be in the best position to resolve your question or concern, but other resources are available:**

- Human Resources
- Ethics & Compliance
- Legal
- Next level of leadership
- K-C Compliance HelpLine

Confidentiality is always respected. You may even choose to remain anonymous, where permitted by the law of your country, when using our K-C Compliance HelpLine. Nothing in this Code prevents you from reporting potential violations of law to relevant government officials.

---

### HOW WE HANDLE QUESTIONS OR CONCERNS

We will review every question or concern raised using a defined process to ensure fairness and consistency as described in our Compliance HelpLine Reporting Policy. We will treat you with dignity and respect throughout the process. You can trust that we will handle your question or concern seriously and promptly. If something needs to be addressed, we will take action based on what we learn.

---

## NO TOLERANCE FOR RETALIATION

It takes courage to speak up when something is not right. Any retaliation - whether direct or indirect - against an employee who raises a good faith concern or participates in a case review is grounds for discipline, up to and including dismissal. Our anti-retaliation commitment is further described in our Compliance HelpLine Reporting Policy.

## HOW LEADERS SHOULD HANDLE CONCERNS

Leaders set the example for our values-driven culture. They reinforce the open reporting environment, allowing us to learn about potential issues so that we can proactively address them.

If someone raises a question or concern to a leader, they have a special responsibility to listen and act. Handling these situations appropriately is important to resolving issues fairly and building trust. Leaders should:

- **Listen carefully.** Thank the person for speaking up while remembering that they have done something difficult and very important for the company.
- **Respond respectfully.** Take every concern seriously, even if you disagree. Commit to addressing the issue.
- **Take steps to protect the person's confidentiality.** Avoid discussing the conversation with others and only share on a need-to-know basis.

Leaders are empowered to resolve performance issues themselves. However, leaders should seek help about ethics or compliance questions from the Global Ethics & Compliance Office or the K-C Compliance HelpLine.

**Anyone can always contact the Global Ethics & Compliance Office for guidance.**

Choose whichever reporting option you are most comfortable using. Whichever option you choose, your confidentiality is always respected.

### Email

[KCHelpLine@kcc.com](mailto:KCHelpLine@kcc.com)

### Web

[www.KCHelpLine.com](http://www.KCHelpLine.com)

### Phone

1.844.KCHELP1

1.844.524.3571 (U.S.)

For non-U.S. numbers, visit

[www.KCHelpLine.com](http://www.KCHelpLine.com)

### Mail

Global Ethics &  
Compliance Office  
Kimberly-Clark  
351 Phelps Drive  
Irving, TX 75038  
United States

For additional information, visit the Ethics & Compliance Homepage on @K-C

CODE OF CONDUCT

# OUR PEOPLE



**We are driven by our passion for people. Treating each other fairly and living our One K-C Behaviors are part of who we are.**

From understanding people's most essential needs to creating a culture of care and support, people define who we are and what we do. By respecting and caring for each other, we continue K-C's legacy and sustain the kind of company where we are proud to work. We make decisions and operate in the best interests of K-C rather than for personal gain. Living the K-C Values and One K-C Behaviors is essential to our success.



Valuing Diversity  
and Inclusion

Managing Conflict  
of Interest

Communicating  
Externally

# VALUING DIVERSITY AND INCLUSION

## OUR STRENGTH LIES IN THE TALENT AND DIVERSITY OF OUR PEOPLE

We share responsibility for fostering an inclusive and respectful workplace that develops our people and helps us achieve our potential as individuals and as a company.

## OUR ESSENTIAL COMMITMENTS

- We recognize each other's diverse abilities and experiences and offer and accept different perspectives
- We maintain a respectful workplace and do not tolerate any forms of harassment or bullying. We seek to make every employee feel welcome
- We make employment decisions based on job qualifications and merit
- We do not discriminate based on protected characteristics or protected activities, consistent with our K-C policies
- We respect the right of freedom of association





# MANAGING CONFLICT OF INTEREST

## PUTTING K-C'S INTERESTS FIRST

Nothing we do interferes, or appears to interfere, with our responsibility for objective and unbiased decision-making. A conflict of interest can arise when our personal or professional relationships overlap with our job responsibilities. If we do not manage potential conflicts of interest carefully, these situations can impact the decisions we make, erode trust within our teams, and harm K-C's reputation.

## OUR ESSENTIAL COMMITMENTS

- We avoid actions and decisions that create, or even appear to create, a conflict of interest with K-C
- We never use our position at K-C for improper personal gain
- We do not improperly use K-C resources or influence because even the perception of a conflict of interest may have negative consequences
- We understand that conflicts of interest may arise, including:
  - » working with a relative at K-C
  - » having a relative work for a K-C vendor or customer
  - » working or consulting outside K-C
  - » owning a financial interest in a K-C vendor or customer
- We consult our Conflict of Interest Policy for additional guidance and examples
- When potential conflicts of interest arise, we disclose them promptly to our Team Leader and complete the Conflict of Interest Disclosure Form





# COMMUNICATING EXTERNALLY

## RESPONSIBLE COMMUNICATIONS

We understand that everything we communicate externally affects our reputation. We provide clear and accurate information and are careful not to disclose confidential information.

## OUR ESSENTIAL COMMITMENTS

- We responsibly engage with social media
- We do not speak for K-C on social media unless authorized to do so, and we clearly state when we are sharing our personal views
- We never disclose K-C's confidential or proprietary information, and we comply with our Social Media Guidelines for Employees
- We participate in external speaking engagements only with approval from a Vice President and do not accept compensation, except as allowed by our Business Gratuities and Conflict of Interest Policies
- We refer media contacts to Media Relations and investor and analyst contacts to Investor Relations





HUGGIES

Little Snugglers

micro preemie

mp 30

Diapers Couches  
**HUGGIES**  
Little Snugglers

micro preemie

HUGGIES

micro preemie

Hypoallergenic, Fragrance-Free,  
and Free of Natural Rubber Latex

developed in  
NICU

Soft,  
the

Hypoallergenic  
and Free

mp

Speak Up. Ask Questions. Get Answers.

Email: [KCHelpLine@kcc.com](mailto:KCHelpLine@kcc.com) | Web: [www.KCHelpLine.com](http://www.KCHelpLine.com) | Phone: 1.844.KCHELP1

 **Kimberly-Clark**

CODE OF CONDUCT

# OUR FINANCIAL INTEGRITY



## We are accountable for our business and our future.

To continue our legacy of responsible growth, we must identify and manage our enterprise risks to enable smart risk-taking. Only by being accurate and honest in our accounting and reporting processes can we confidently make decisions to help K-C succeed.

Our technology and intellectual property are also key to our business success and sources of our competitive advantage. We are all responsible for protecting and safeguarding these valuable assets.



Maria Henry, SVP and Chief Financial Officer

Maintaining Strong  
Internal Controls

Choosing Business  
Partners Carefully

Trading Securities Ethically

Protecting  
Information

# MAINTAINING STRONG INTERNAL CONTROLS

## EACH OF US PLAYS A ROLE

Together, we protect K-C's assets and information and ensure our financial integrity. We are committed to maintaining fair, complete, and accurate financial records and to providing timely disclosure of financial information. Maintaining accurate records and internal controls enables good business decision-making and helps meet our obligations.



## OUR ESSENTIAL COMMITMENTS

- We honestly and accurately record and report financial transactions, consistent with applicable laws, regulations, and accounting practices
- We make appropriate decisions, obtain necessary approvals, and properly record transactions in compliance with K-C's accounting practices and Corporate Financial Instructions
- We manage budgets, expenses, and other funds responsibly and accurately
- We protect K-C resources from fraud, waste, and abuse and report any suspect activities immediately
- We do not offer large discounts, make promises to allow for product returns, or encourage the purchase of more product than is necessary for resale needs
- We follow travel and expense policies when submitting or approving reimbursement requests
- We maintain and dispose of K-C records according to our Enterprise Records Retention Schedule



# CHOOSING BUSINESS PARTNERS CAREFULLY

## WE ONLY CONDUCT BUSINESS WITH REPUTABLE SUPPLIERS AND CUSTOMERS

We know our suppliers and customers and avoid becoming associated, even innocently, with illegal activities. We are proud of our reputation and only work with suppliers and customers committed to doing business ethically.

## OUR ESSENTIAL COMMITMENTS

- We conduct business only with suppliers and customers involved in legitimate business activities
- We complete applicable due diligence on prospective suppliers and customers before entering into contracts, and we follow our Procurement, Anti-Corruption, and Third Party Policies
- We promptly report any payments that look irregular or any signs that a supplier or customer could be engaged in improper activities. Examples could include:
  - » unusual orders, purchases, or payments
  - » unusually complex deal structures
  - » unusual fund transfers
- We are committed to complying with applicable money laundering, corruption, and terrorism financing laws and regulations



# TRADING SECURITIES ETHICALLY

## WE RESPECT FINANCIAL LAWS AROUND THE WORLD

In our work, we may become aware of material, non-public information about K-C or companies we do business with. We do not disclose or use this information in violation of K-C's insider trading policy or laws. We seek to preserve K-C's reputation as a company that can be trusted to deal honestly, everywhere we do business.

## OUR ESSENTIAL COMMITMENTS

- We never buy or sell stocks based on material, non-public information, that is, inside information that could make the stock price go up or down
- We do not give someone else a tip to buy or sell securities of any company while having material, non-public information
- We protect the confidentiality of K-C's non-public information and only share with other K-C employees on a need-to-know basis
- We do not share material, non-public information outside K-C unless legal protections, such as a confidentiality agreement, are in place
- We follow our Insider Trading Policy to understand when and under what situations we can trade stocks

# PROTECTING INFORMATION

## INFORMATION TECHNOLOGY & CYBER SECURITY

We are responsible stewards of K-C's technology resources. Our information technology is critical to our operations and allows us to work more efficiently to meet our business objectives. These resources belong to K-C, and we use them responsibly and securely to protect against cyber security threats and vulnerabilities.



## OUR ESSENTIAL COMMITMENTS

- We only use K-C authorized hardware, software, and other IT services
- We exercise good judgment when using company-provided technology resources and prevent unauthorized access to K-C information by:
  - » securing hardware and storage areas
  - » using strong passwords and not sharing them with anybody
  - » knowing the signs of phishing and alerting the IT Desk
  - » referring to Corporate IT Policies for additional guidance
- We do not use K-C IT resources to engage in inappropriate communications or access sites that are offensive, illegal, or obscene
- We limit personal use of K-C email and internet to a reasonable minimum

## DATA PROTECTION AND PRIVACY

We are transparent about how we handle data and respect the privacy of our employees, consumers, and business partners who share personal data with us. Personal data is defined broadly and includes personal information, such as name, address, and gender; financial data, such as payroll and credit card details; and, online identifiers. We handle this information responsibly and consistent with data protection and privacy laws. We build trust when our employees, consumers, and business partners know that we protect their privacy and the security of the personal data they share.

## OUR ESSENTIAL COMMITMENTS

- We follow applicable data protection and privacy laws
- We properly secure personal data
- We only collect and use personal data for legitimate business purposes and follow our Data Privacy Policy
- We only share personal data within K-C on a need-to-know basis
- We ensure our third parties follow K-C's data protection and security standards
- We keep personal data according to our Enterprise Records Retention Schedule and then destroy it securely

# PROTECTING INFORMATION

## CONFIDENTIAL INFORMATION AND INTELLECTUAL PROPERTY

We protect the business value of our confidential information and intellectual property and handle them with care. We also protect and respect the confidential information and intellectual property of third parties, including competitors, suppliers, and customers. K-C's confidential information and intellectual property are critical in helping us develop new products, attract new consumers, and maintain our competitive advantage.

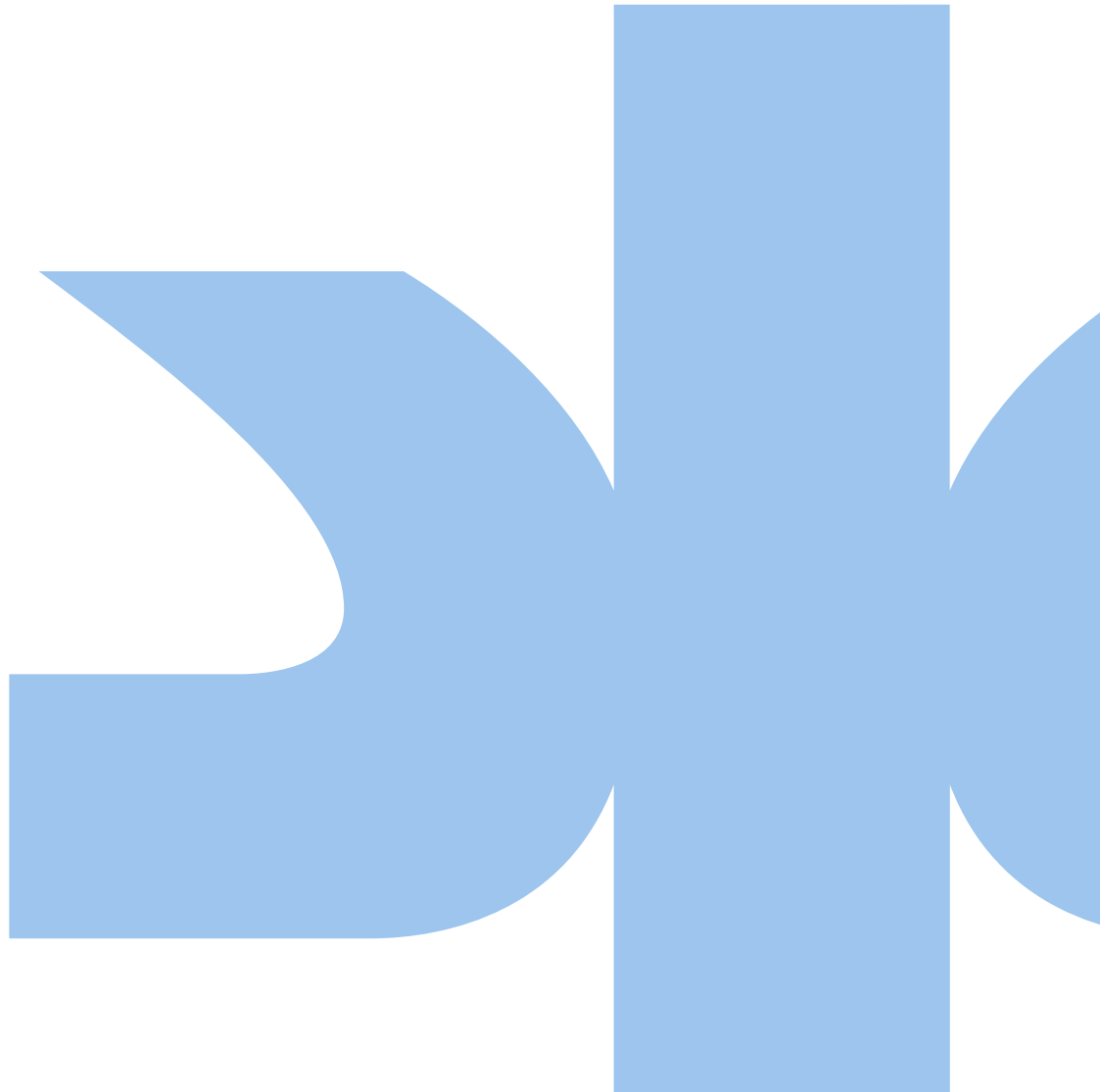
## OUR ESSENTIAL COMMITMENTS

- We are responsible for preserving K-C's intellectual property rights and protecting our innovations
- We handle our confidential information with care and avoid discussions in public places or with others who do not need to know
- We only use our intellectual property for K-C's benefit, never for personal gain or for others outside of K-C
- We only use or share K-C's intellectual property with people outside K-C when proper controls are in place
- We maintain confidentiality even if we stop working for K-C and return confidential information and intellectual property before leaving
- We respect the confidentiality and intellectual property rights of third parties, including competitors, suppliers, and customers, and do not use their information without prior Legal approval
- We follow our Confidential Information Policy
- We understand that nothing in the Code prevents us from reporting possible legal or regulatory violations to relevant government officials



CODE OF CONDUCT

# OUR CONSUMERS & OPERATIONS



## No business result is ever worth compromising our commitment to integrity.

We believe that honesty and trustworthiness build long-lasting relationships with our consumers, customers, suppliers, and business partners. Fair dealing is central to our culture. In every situation, we commit to competing fairly and responsibly. We never offer or accept any payment or incentive to improperly influence a business decision.



## COMPETING FAIRLY

### WE COMPETE VIGOROUSLY AND MAKE DECISIONS INDEPENDENTLY

We treat customers and suppliers fairly and are accountable for free and fair competition. We were founded on the belief that living our K-C values represents a competitive advantage resulting in great quality and innovative products at competitive prices.



This photo is the only known picture of the four Kimberly-Clark founders together. Clockwise from top left are: Charles B. Clark, Frank C. Shattuck, Havilah Babcock, and John A. Kimberly

### OUR ESSENTIAL COMMITMENTS

- We do not suggest or engage in any actions, understandings, or agreements that try to, or could, limit competition
- We avoid any kind of contact or discussion with competitors that could create the appearance of impropriety and never share or discuss competitively sensitive information. If we come across these situations, we promptly and noticeably end them and notify Legal immediately
- We only use, obtain, accept, or receive information to which K-C is entitled
- We do not take advantage of our market position
- As described in our Competing Fairly Policy, we submit a request for pre-approval before:
  - » engaging in business-related interactions with competitors, including at trade association meetings
  - » considering restricting how, where, when, or to whom customers or distributors sell our products
  - » conditioning the sale of K-C products on the purchase of other K-C products
  - » implementing discounts or other strategies that treat customers differently





# INTERACTING WITH GOVERNMENT OFFICIALS

## HIGHEST ETHICAL STANDARDS

K-C follows the highest ethical standards when conducting business with government officials. We never take shortcuts and are always transparent when dealing with government officials. We comply with federal, state, and local laws when involved in public policy matters and when developing and maintaining relationships with government officials.

### Government Official

Is defined broadly to include elected officials and employees of a federal, national, state, or local government, such as customs officials and tax authorities. It also includes employees of any public agency or state-owned organization, such as state-owned hospitals and universities. In some countries, the definition may also include family members of government officials.

## OUR ESSENTIAL COMMITMENTS

- We do not offer, promise, make, or authorize the giving of anything of value to a government official that is inconsistent with our Code and Anti-Corruption Policy
- We engage Legal before pursuing business with government officials, which may include working with state-controlled organizations like hospitals, universities, airlines, and utilities
- When working with government officials, we take particular care to perform our contractual obligations
- We do not contact government officials to influence public policy for K-C unless we have Legal pre-approval
- We cooperate fully with all government audits and investigations
- We each have the right to participate in the political process on our own time and at our own expense but may not use K-C resources for political purposes or contributions without prior Legal approval



Speak Up. Ask Questions. Get Answers.  
Email: [KCHelpLine@kcc.com](mailto:KCHelpLine@kcc.com) | Web: [www.KCHelpLine.com](http://www.KCHelpLine.com) | Phone: 1.844.KCHELP1

# PREVENTING CORRUPTION AND BRIBERY

## TRUST, TRANSPARENCY & ACCOUNTABILITY

We base our business relationships on trust, transparency, and accountability. We prohibit bribery in all business dealings, in every country around the world, with governments and the private sector. Winning business fairly and building trust with our customers is the K-C way.

## OUR ESSENTIAL COMMITMENTS

- We never offer, promise to provide, or give anything of value to anyone in order to gain a business advantage as described in our Code and Anti-Corruption Policy
- We prohibit even small facilitation payments, which are payments to government officials to expedite an administrative action, such as securing a permit, except in extraordinary circumstances when our safety is at risk
- We check with our Team Leader or Legal to understand required due diligence steps before hiring a third party, and then we follow the procedures in our Procurement, Anti-Corruption, and Third Party Policies
- We do not ask a third party to do something that we, ourselves, are prohibited from doing
- We keep thorough and complete records of all transactions with third parties according to our Enterprise Records Retention Schedule
- We do not provide business gratuities, including gifts and entertainment, to government officials or their families without complying with our Anti-Corruption and Business Gratuities Policies and completing the Business Gratuities Disclosure Form

# GIVING OR RECEIVING BUSINESS GRATUITIES

## BUILDING RELATIONSHIPS ETHICALLY

Business gratuities, which include anything of value, such as gifts, meals, or entertainment, can strengthen working relationships with our business partners. We avoid even the appearance of making business decisions based on business gratuities. We are committed to winning business on the quality of our products and solutions. We would always rather lose the business than secure it through an improper payment.

## OUR ESSENTIAL COMMITMENTS

- We do not give or ask for business gratuities to make the other person feel obligated to do something in return
- We limit giving or receiving business gratuities to what is reasonable and appropriate under the circumstances and avoid frequent gifts to or from the same person or company, consistent with our Code and Business Gratuities Policy
- We make sure that any business gratuity given or received complies with our Business Gratuities Policy, and we obtain approval, when required, by completing the Business Gratuities Disclosure Form
- We do not offer, promise, make, or authorize the giving of anything of value to a government official that is inconsistent with our Code and Anti-Corruption Policy
- If we make charitable donations, we do so in accordance with K-C policy to support legitimate charitable causes, not as part of an exchange of favors

## DOING BUSINESS GLOBALLY

### WE DO BUSINESS IN MORE THAN 175 COUNTRIES AROUND THE WORLD

As a global company, we are responsible for complying with laws and regulations governing the import and export of K-C products everywhere we operate. To deliver on our commitments, we always know what we are importing and exporting and the destination of our goods.

### OUR ESSENTIAL COMMITMENTS

- We comply with all applicable export controls, economic sanctions, anti-boycott, and customs laws
- We only use K-C approved third parties, including customs brokers and logistics providers
- We ensure information provided to any customs official or to any agent hired to facilitate K-C imports and exports is accurate and truthful
- We report any concerns about customs payments that seem suspicious or out of the ordinary
- We maintain records of all import and export transactions according to our Enterprise Records Retention Schedule
- We consult our Export Controls and Economic Sanctions and Anti-Boycott Manuals when we need additional guidance



# MARKETING AND ADVERTISING RESPONSIBLY

## TRUST AND CONFIDENCE

Our marketing and advertising statements are honest and supported by facts. We earn the trust and confidence of our consumers every day and strive to maintain the highest standards in marketing and advertising our products.

## OUR ESSENTIAL COMMITMENTS

- We comply with applicable marketing laws and regulations
- Our advertising and promotional materials are accurate and free from false claims
- We ensure our marketing is based on factual information
- We are mindful of the environmental implications of new product development and packaging
- We comply with the relevant K-C Advertising and Promotion Guidelines and consult Legal with any questions







OUR  
ENVIRONMENT,  
SAFETY, &  
COMMUNITY



## Everything we do is motivated by our vision to lead the world in essentials for a better life.

Our brands are an indispensable part of life for people in more than 175 countries. Every day, nearly a quarter of the world's population trusts K-C brands and the solutions they provide to enhance their health, hygiene, and well-being. To fulfill our responsibilities, we commit to sustaining our environment, supporting our communities, maintaining a safe and healthy workplace, and ensuring product safety and quality. We hold our business partners to the same high standards that we hold ourselves.



# COMMITTING TO SUSTAINABILITY

## PROTECTING THE ENVIRONMENT AND CREATING POSITIVE SOCIAL IMPACT

We respect international social principles aimed at promoting and protecting human rights and invest in improving the lives of people in need. We are committed to operating our business in a way that protects the environment and promotes the sustainable use of natural resources.

We recognize that a sustainable supply chain creates value for our customers, suppliers, and K-C and minimizes risk to our ongoing business success.

## OUR ESSENTIAL COMMITMENTS

- We follow environmental laws, regulations, and standards and ensure our actions do not adversely impact the environment or the communities in which we operate
- We support the sustainable use of natural resources, including water conservation, the reduction and beneficial reuse or recycling of waste, and reduction of greenhouse gas emissions
- We utilize materials efficiently in product design and manufacturing
- We ensure that products and materials we purchase come from traceable, resilient, and sustainable sources
- We are committed to promoting and protecting human rights through compliance with our Social Compliance Standards
- We improve the well-being of people in need through social and community investments and partnerships



# ENSURING WORKPLACE SAFETY

## COMMITTED TO SAFETY

We are committed to the highest standards of safety to care for and protect each other, our business partners, our visitors, and our communities. We all share the responsibility to maintain a safe, secure, and healthy workplace and to protect our people and our operations.

## OUR ESSENTIAL COMMITMENTS

- We follow applicable safety and security procedures and watch out for each other to ensure workplace safety and prevent injuries
- We make safety a personal value and care about our own safety, others' safety, and continuously improving safety
- We follow all facility entry and exit procedures, including questioning or reporting individuals without badges and visitors without escorts
- We actively participate in crisis and safety drills at our locations so that we know what to do if there is an emergency
- We do not possess or work under the influence of illegal drugs or alcohol, and we comply with requests for drug and alcohol testing as required
- We do not say or do anything that threatens safety or security or creates fear, such as possessing or using a weapon while on K-C premises or at K-C events
- We immediately report any unsafe conditions to our Team Leader, the Site Safety Leader, or Global Safety



# DELIVERING PRODUCT QUALITY

## ACHIEVING REGULATORY EXCELLENCE

We lead the world in essentials for a better life and empower people all over the world to experience more of what is essential to them. To fulfill our promise, we are committed to providing safe, high-quality products across all our brands. Our consumers rely on this commitment and trust us to provide products meeting the highest standards of safety and quality performance.

## OUR ESSENTIAL COMMITMENTS

- We meet or exceed all applicable safety and quality standards
- We know and follow the policies and procedures that apply to the products and activities at our locations. We never take shortcuts
- We comply with all applicable laws and regulatory requirements and follow K-C Quality Management Systems Requirements
- We do not knowingly produce or distribute products, including promotional items and services, that would harm consumers' health, the environment, or K-C's brand reputation
- If we see, hear, or become aware of something that negatively affects the safety, quality, or regulatory compliance of a K-C product, we speak up and report it immediately





# ENGAGING SUPPLIERS

## ETHICAL BUSINESS PARTNERS

We rely on many other companies and individuals to source, manufacture, and distribute our brands. Our suppliers, vendors, service providers, distributors, and contract manufacturers are carefully selected through fair competition. We partner only with companies that offer the best total value and share our commitment to ethical business practices.

## OUR ESSENTIAL COMMITMENTS

- We evaluate our suppliers' qualifications and reputation and clearly explain the reasons we need them before selection
- We select suppliers based on objective criteria and ethical business practices and issue purchase orders or contracts before any work is performed or goods delivered
- We treat our suppliers honestly and fairly, honor contract terms, and ensure timely payments
- We consult and follow our internal procurement policies and controls documented in The CLEAR Guide to Procurement
- All K-C suppliers must treat their employees respectfully and in a manner consistent with our Code, and comply with all applicable laws, regulations, and requirements as well as our Social Compliance Standards





# INDEX

- Accounting, 17, 18
- Advertising, 36
- Alcohol, 42
- Anonymous, 6
- Boycott, 34
- Bribery, 30, 32
- CFIs/Corporate Financial Instructions, 18
- Competitor, 24, 28
- Concerns, raising or reviewing, 4, 5, 6, 7
- Confidential information, 14, 24
- Confidentiality, 6, 7, 21, 24
- Conflict of Interest, 12, 14
- Consumers, 1, 23, 24, 27, 36, 44
- Corruption, 20, 30, 32, 33, 40
- Crisis, 42
- Customers, 5, 12, 20, 24, 27, 28, 32, 40
- Customs, 34
- Cyber security, 22
- Data protection, 23
- Disclosure, 12, 18, 32, 33
- Discount, 18, 28
- Discriminate, 10
- Distributors, 28, 46
- Diversity, 10
- Donation, 33
- Drugs, 42
- Due diligence, 20, 32
- Environment, 36, 39, 40, 44
- Ethics & Compliance Office, 4, 6, 7
- Expense reimbursement, 18
- Export, 34
- External speaking, 14
- Facilitation payment, 32
- Financial information, 18
- Fraud, 18
- Freedom of Association, 10, 40
- Gifts, 32, 33
- Government official, 6, 24, 30, 32, 33
- Gratuities, 14, 32, 33
- Harassment, 10
- HelpLine, 6, 7
- Human rights, 40
- Import, 34
- Insider trading, 21
- Intellectual property, 17, 24
- Investor, 14
- Marketing, 36
- Media, 14
- Payments, improper or illegal, 20, 32, 34
- Phishing, 22
- Political activity, 30
- Privacy, 23
- Procurement, 20, 32, 46
- Product quality and safety, 33, 39, 40, 44
- Records retention, 18, 23, 32, 34
- Respect, 6, 7, 10, 46
- Responsibilities, employee and leader, 4, 5
- Retaliation, 1, 3, 5, 7
- Safety, 32, 39, 40, 42, 44
- Security, 22, 23, 42
- Social media, 14
- Speaking up, 1, 3, 5, 6, 7
- Suppliers, 20, 24, 27, 28, 40, 46
- Sustainability, 39, 40
- Technology, 17, 22
- Third party, 20, 23, 24, 32, 34
- Trade association, 28
- Trade loading, 18



To ask a question or raise a concern,  
choose whichever reporting option you  
are most comfortable using.

Whichever option you choose, your  
confidentiality will be respected:

**Email**

[KCHelpLine@kcc.com](mailto:KCHelpLine@kcc.com)

**Web**

[www.KCHelpLine.com](http://www.KCHelpLine.com)

**Phone**

1.844.KCHELP1

1.844.524.3571 (U.S.)

For non-U.S. numbers,  
visit [www.KCHelpLine.com](http://www.KCHelpLine.com)

**Mail**

Global Ethics  
& Compliance Office  
Kimberly-Clark  
351 Phelps Drive  
Irving, TX 75038  
United States

For additional information,  
visit the Ethics & Compliance  
Homepage on @K-C

