PRO BONO LEGAL SERVICE GUIDELINES
OF THE CLOROX COMPANY'S LEGAL SERVICES DEPARTMENT

Purpose

To state the Clorox Legal Service Department's (the "Legal Department") guidelines regarding Legal Department employee participation in pro bono legal service and community service. (References to "The Clorox Company", "Clorox" and "Company" refer to The Clorox Company and its subsidiary companies.)

Scope

All Legal Department employees.

Guidelines

The Clorox Company and its employees have long fostered a culture of personal generosity by donating their time and money to help others. As stated in Clorox's Corporate Social Responsibility statement, the Company believes that achieving business goals and serving our communities go hand in hand. Clorox is committed to improving the quality of life in the communities where our employees live and work. Consistent with this commitment and subject to the guidelines set forth herein, assistants, paralegals, attorneys and other personnel of the Legal Department are encouraged, but not required, to participate in pro bono and other community service activities. Accordingly, the following pro bono guidelines are intended to outline the pro bono/community service program available to the members of the Legal Department.

"Pro Bono Service" Defined

At Clorox, pro bono legal services means the rendering of professional legal services without compensation or the expectation of compensation to (a) individuals with limited means, (b) individuals with limited access to legal services, or (c) organizations that qualify as not-for-profit under federal tax law.

"Community Services" Defined

Community services falls within the scope of Clorox Corporate Policy E-4 (civic and charitable activities) and the guidelines set forth therein. The guidelines set forth here are not designed to limit the Legal Department's participation in community service as set forth in Clorox Corporate Policy E-4 but are designed to supply more structure around providing pro bono legal services and reporting department involvement in all pro bono legal services and community service.

Community Service Guidelines: For participation in community service, see Clorox Corporate Policy E-4. For use of support staff to help with charitable and civic activities, see Clorox Corporate Policy E-4. For use of Company facilities for charitable or civic activities, see Clorox Corporate Policy E-4.

Pro Bono Services Guidelines:

- Only pro bono activities approved by the Company's General Counsel will be deemed to be "Clorox Legal Services Pro Bono Work".
- Clorox Legal Services Pro Bono Work participants are acting as Company employees with respect to the matters they undertake; provided, however, the Company does not endorse positions taken on behalf of pro bono clients.
- Clorox Legal Services Pro Bono Work may be undertaken during the work week, so long as that work does not interfere with other assigned responsibilities and other Clorox policies.
- Clorox Legal Services Pro Bono Work must be handled with the same level of competence as any other matter handled by members of the Legal Department.
- No Legal Department employee will be adversely affected by a decision to participate in Clorox Legal Services Pro Bono Work, as long as such participation does not interfere with regular work assignments and other assigned responsibilities. No Legal Department employee will be adversely affected by a decision not to participate in Clorox Legal Services Pro Bono Work.

- As with any other work assignment, individuals doing Clorox Legal Services Pro Bono Work can utilize Legal Department legal assistants, secretaries and other support staff in a manner consistent with their job responsibilities.
- Legal Department personnel may use company facilities as appropriate to carry out Clorox Legal Services Pro Bono Work. Ordinary expenses (e.g., parking, gas mileage and the like) for Clorox Legal Services Pro Bono Work may be submitted for reimbursement. Expenses exceeding $50 (per occurrence) should be submitted to the Pro Bono Committee (as defined below) for **prior** approval. Legal Department personnel should make every effort to control expenses related to Clorox Legal Services Pro Bono Work just as they would for any other legal matter.
- It is essential that the Company's General Counsel and the Pro Bono Committee be advised as early as possible in the event that a claim or disciplinary complaint is filed concerning a pro bono legal representation matter. If a claim is received by a volunteer, the claim and all relevant details must be immediately forwarded to the Pro Bono Committee.
- Because Clorox Legal Services Pro Bono Work may require Legal Department personnel to work outside of their areas of expertise and skill, the Legal Department will make available to all pro bono volunteers substantive support services, if requested, to enable them to provide effective and efficient representation in pro bono legal representation matters.

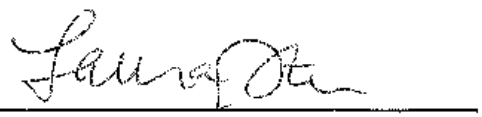
Pro Bono / Community Services Legal Department Reporting

On an annual basis, the Legal Department will conduct a voluntary survey regarding the pro bono legal services and community service (civic and charitable) hours contributed during the past year by Legal Department personnel, whether or not such service is sponsored by the Legal Department, and the nature of the pro bono legal service and/or community service work undertaken. The Legal Department will issue a summary report of the status of pro bono legal services and community service work (the "Report"). The Legal Department will use the Report to highlight the Legal Department's commitment to the Clorox value of "Doing the Right Thing" and to the Company's Corporate Social Responsibility to the community.

Those participating in Clorox Legal Services Pro Bono Work and community service work are encouraged to keep track of the numbers of hours spent on this work to enable the Legal Department to evaluate the level of pro bono/community service participation in the Legal Department and to help the employee apply for Clorox Foundation Commitment Award grants (which requires a minimum of 24 hours of service for a $300 dollar donation to the relevant organization).

Legal Department Pro Bono Committee

The Legal Department has established a committee to help ensure that all Clorox Legal Services Pro Bono Work matters are adequately supervised, to make appropriate training, materials and mentors available for all Legal Department personnel participating in Clorox Legal Services Pro Bono Work and to report out the Legal Department's pro bono legal services and community services efforts (the "Pro Bono Committee"). The Pro Bono Committee will include individuals representing the various types of Legal Department employees. The General Counsel will appoint the members of the Pro Bono Committee, who will be responsible for ensuring that the membership of the Pro Bono Committee is representative of the Legal Department. The Pro Bono Committee will meet regularly, in person or by teleconference, to deal with any operational or policy issues that may have arisen, to review and revise the list of resources for pro bono legal services, to make recommendations with respect to budgetary matters and to recommend to the Company's General Counsel pro bono opportunities that they believe should be included in Clorox Legal Services Pro Bono Work.



April 20, 2007

Laura Stein
Senior Vice President – General Counsel