

FORWARD

Forward by J.T. Harrison - Vice President, Logistics & Procurement

Welcome to the Oil-Dri Corporation of America Supplier Code of Conduct handbook.

These days, our customers and global government regulations are requiring an ever-increasing amount of oversight regarding all aspects of the supply chains we operate in.

As a valued supply partner to Oil-Dri, we need your support to help us maintain an efficient, compliant, and socially responsible supply chain which will enable Oil-Dri to continue to provide the best possible products and service levels to our customers.

Communication between our supply base and Oil-Dri is vital to building a collaborative and successful partnership. The supplier handbook represents a comprehensive guide to working with Oil-Dri and describes the expectations of our suppliers and service providers with whom we choose to develop long-term business and strategic partnerships.

We thank you in advance for your support and collaboration and look forward to a future of continued growth and success together, as we strengthen our partnership to build a world-class supply chain for our mutual benefit.

VISION

Deliver best-in-class sourcing value & innovation which helps provide a competitive advantage for Oil-Dri and our customers.

MISSION

Use our intellectual capital to collaborate with our supply chain partners to deliver a safe, highly predictable, and manageable global supply chain allowing us to continually create and deliver value from sorbent minerals.

INTRODUCTION AND PURPOSE

Oil-Dri is a publicly traded yet family-controlled organization that emphasizes honesty, integrity, and accountability. The company is dedicated to fulfilling its mission to Create Value From Sorbent Minerals. Doing so requires that we find opportunities that grow and strengthen our business. By partnering with trusted suppliers from around the world, we are able to cultivate new ideas, drive mutual value, and achieve our vision.

Whether you are a current or potential supplier, we invite you to explore this Supplier Handbook and our public [website](#) to better understand who we are and how to conduct business with us. Here you will learn more about the values, ethics, and standards we hold ourselves and our suppliers to each and every day around the globe. Our [website](#) also connects you to other process guidelines and important tools that enable more efficient ways of working together, and much more.

We look forward to partnering with you as we continue to create value from sorbent minerals.

SUPPLY CHAIN MANAGEMENT GUIDELINES

Supplier Code of Conduct

Oil-Dri Corporation of America is committed to conducting its business legally and ethically. Accordingly, Oil-Dri expects its external suppliers and service providers to support the principles set forth in our Code of Ethics and Business Conduct (“Code of Conduct”) (available to the general public at <https://investors.oildri.com/governance/governance-documents>) including the following basic principles set forth in this Supplier Code of Conduct, when working with us.

Suppliers should report any violations of this Supplier Code of Conduct to Oil-Dri. In addition, suppliers who believe an Oil-Dri employee, or anyone acting on Oil-Dri’s behalf, has engaged in illegal or otherwise improper conduct with respect to their business with the supplier, should report the matter to Oil-Dri.

Reports of a violation or possible violation may be made in writing to: Oil-Dri Corporation of America, 410 N. Michigan Avenue, Suite 400, Chicago, IL 60611-4213, Attention: Compliance, to the Company’s Compliance Hotline by telephone at (866) 230-0009 within the U.S. or (800) 603-2869 outside the U.S, or online to www.lighthouse-services.com/oildri. The Company’s Compliance Hotline is operated by an outside vendor to ensure confidentiality and, where permitted by law, anonymity.

Lawful and Ethical Behavior is Required at All Times

It is the policy of Oil-Dri to be a good corporate citizen of the countries and localities where we conduct our business. Oil-Dri has a responsibility to obey all applicable laws and to promote high standards by conducting the Company’s business in a clear ethical manner. We expect our suppliers to do the same and operate their business in accordance with all applicable laws and regulations, as well as in accordance with the standards set out in this Supplier Code of Conduct. It is both right, and in the best interest of all of us, to act in accordance with this Supplier Code of Conduct. Integrity must continue to be the basis of all our business activities.

Gifts and Gratuities

Gifts that could reasonably be considered attempts to improperly influence an Oil-Dri employee are never allowed. Oil-Dri prohibits the solicitation, acceptance, or receipt by any Oil-Dri director, officer, or employee of any gift, gratuity, favor, entertainment, reward, or any other thing of monetary value from the Company’s suppliers that have more than nominal value, are customary in the industry, will not violate any laws, and will not influence or appear to influence the individual’s judgment or conduct in the Company’s business. Suppliers shall not make direct or indirect political contributions on Oil-Dri’s behalf.

Improper Payments

Suppliers must comply with all applicable anti-bribery and anti-corruption laws, including the U.S. Foreign Corrupt Practices Act. Suppliers may not make, or cause another person to make, a bribe, payment, or gift to any government official anywhere in the world on behalf of Oil-Dri, whether or not



there is an intent to influence. Oil-Dri also prohibits suppliers from offering incentive payments or gifts to any Oil-Dri employee in order to obtain or retain our business or otherwise influence a business decision, or otherwise engaging in any commercial bribery.

Fair Competition

Oil-Dri seeks to outperform competition fairly and honestly by seeking competitive advantages through superior performance, never through unethical or illegal business practices. Oil-Dri directors, officers, and employees are required to deal fairly with Oil-Dri's customers, suppliers, competitors, and employees. Oil-Dri's suppliers must also compete fairly and legitimately in the marketplace. Suppliers may not take unfair advantage through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other unfair dealing. Suppliers must avoid agreements or actions that illegally restrain trade or restrict competition.

Conflicts of Interest

A conflict of interest may arise when suppliers have outside interests that may adversely affect their motivation or performance on behalf of Oil-Dri. All suppliers must avoid any conflict of interest in their work with Oil-Dri and must disclose any potential conflicts as soon as they become aware of them. Suppliers must also avoid any interaction with Oil-Dri employees that may conflict, or appear to conflict, with that employee acting in the best interest of Oil-Dri.

Human Rights and Labor Practices

Oil-Dri values diversity and respects equal opportunity in employment. We expect our suppliers to treat people with respect and dignity, encourage diversity and diverse opinions, and promote equal opportunity. Suppliers must provide a workplace free of harassment and discrimination. Oil-Dri has adopted a Human Right Policy and strives to respect and promote human rights in accordance with the UN Guiding Principles on Business and Human Rights. The Company expects its suppliers to uphold the human rights of all individuals associated with their operations to the same standards as Oil-Dri. Oil-Dri will not tolerate any supplier who engages in child labor, human trafficking, or forced labor practices. Suppliers are required to be in compliance with any local or national labor laws regarding compensation and working hours. Suppliers must also respect employees' lawful right of freedom of association as well as their right to join or not join a labor union and to collectively bargain.

Environmental Responsibility

Suppliers must comply with all applicable environmental laws and regulations. All required environmental permits, licenses, information registrations and restrictions must be obtained legally and properly, and their operational and reporting requirements followed. Oil-Dri seeks to minimize negative impacts upon our communities by making pollution prevention an integral part of how we work. Our facilities take actions to prevent, eliminate, or reduce the generation of pollutants by our operations and products. We also responsibly treat and manage any residuals from our operations. We encourage our suppliers to act likewise.

Safety

Safety is a core value at Oil-Dri. We believe that zero injuries are an achievable goal. We are committed to the health and safety of our employees, contractors, customers, and the public. We conduct our business in a safe manner and expect our suppliers to do the same. Suppliers must comply with all applicable safety laws and regulations. Further, suppliers must implement safety management programs and commit to the concept of continuous improvement as it relates to safety performance. Suppliers' products must be safe for their intended use in terms of human health and environment. They must also ensure that the information necessary for the safe handling and use of their products is available. Special attention must be paid to hazardous materials. In this case, product safety must be evaluated in a risk assessment process.

Transparency - Right of Inspection and Audit

In accordance with Oil-Dri's due diligence responsibility based on Oil-Dri's specific policies, international initiatives, etc. Oil-Dri requires suppliers to accept, acknowledge, and implement any requirements and transparently share and prove as required. Oil-Dri, or a third-party auditor (designated by Oil-Dri) will undertake affirmative measures, such as on-site audits, to confirm correct implementation and compliance with relevant recognized standards. Subject to inspections/audits may be any supplier, based on internal evaluation with potential or acute risks e.g. local legislation, geographical/environmental (e.g. water risk), ethical breach, demographic risk factors and at random. Scope of inspection/audit can include items such as financial records, compliance documents, operational processes, or security practices.

Oil-Dri will provide adequate advance notice before conducting an audit, and the audit subject will allow access rights to documents, personnel, and systems necessary for conducting the audit. Oil-Dri affirms that any information obtained during the audit be kept confidential. Reasonable access will be granted to the supplier's facilities for the purpose of conducting audits relevant to the supplier's performance, service, or other relevant matters in order to assure correct billing by the vendor, verification of service levels for the vendor, and verification of all contract agreements for service.

Refusal to comply with these standards may be subject to immediate cancellation of outstanding orders/return of shipment/ terminate of future business with Oil-Dri Corporation of America. Failure of an audit will require the supplier to develop necessary mitigation actions and provide a timeline in accordance.

Oil-Dri Intellectual Property and Information

Suppliers are expected to protect and respect all intellectual property belonging to Oil-Dri. Suppliers must also protect Oil-Dri's confidential information to prevent its misuse, theft, or improper disclosure. All competitor information is obtained and used legitimately in compliance with all applicable laws and regulations. No attempt is made to divulge to Oil-Dri any information about its competitors. Likewise, Oil-Dri's confidential information must not be shared with any third party unless expressly permitted by Oil-Dri in writing.

Management of Oil-Dri Data and Assets

Supplier must treat Oil-Dri data, to address confidentiality, information security, and privacy requirements of Oil-Dri's proprietary information, as well sensitive information for customers and employees (e.g., personally identifiable information). In addition, clear ownership documentation will be required for assets owned by Oil-Dri but transferred to supplier including, but not limited to, equipment, materials and other inventory, which will include specific location of assets.

Compliance

Suppliers must implement systems and controls to promote compliance with applicable laws and regulations at the federal, state, local levels, and this Supplier Code of Conduct, as well as complying with their contractual obligations to Oil-Dri. Suppliers may never make a false statement or falsify the records of the work they do on behalf of Oil-Dri.

Cyber Security

Suppliers are required to maintain and share upon demand a business continuity plan covering contingencies for any cyber security event. This must include:

- Plan of notification to Oil-Dri of data breach
- The state of its contingency plan in writing
- Written understanding of what is mission critical for the process
- Cadence to provide timely updates on readiness
- Policy for backups of electronic media and the location of backups
- Plan for obtaining backup equipment if it is critical to the mission
- Names and alternate numbers of key personnel responsible for continuing service in a crisis situation
- Plans for alternative means of communication in the event of failure
- Alternate locations that will be used in an emergency

NOTE: This Supplier Code of Conduct represents fundamental principles to which Oil-Dri is committed. However, this document is not intended to provide an independent basis for assertion of contractual rights against Oil-Dri.