

# Human Rights Policy

## Leadership Message

\*Kimberly-Clark

### A Message from Lisa Morden

VP, Safety, Sustainability & Occupational Health



At Kimberly-Clark (K-C) our commitment to a Better Workplace includes ensuring that people impacted by our global operations and supply chains, including our workers around the world - and those of our suppliers - are treated with respect, and that our workplace and human rights standards are met.

We have adopted this Human Rights Policy to provide guidance on how we promote and support human rights. In addition, K-C expects our suppliers and business partners to follow the requirements established in our Supplier Social Compliance Standard. By holding ourselves and our suppliers accountable, we promote safe, fair, and equitable working conditions for hundreds of thousands of workers in our supply chain.

Thank you for joining in the effort to uphold K-C's commitment to a workplace that embodies our commitments and standards.

Thank You,

Lisa Morden  
Vice President, Safety & Sustainability & Occupational Health

### Table of Contents

Leadership Message	1
Why It Matters	2
The K-C Way	2
What's Expected	5

Revision Date: April 15, 2024

### POLICY OWNER AND RESOURCES

Policy Owner: Lisa Morden, VP, EHS & Sustainability

Policy Location: Global Ethics & Compliance Homepage

Other Resources: Policy Instructions

### K-C HelpLine:

Telephone:  
1-844-KCHELP1  
1-844-524-3571 (U.S.)

For non-U.S. local or toll-free numbers, see:  
[www.KCHelpLine.com](http://www.KCHelpLine.com)

E-mail:  
[KCHelpLine@kcc.com](mailto:KCHelpLine@kcc.com)

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

## Why It Matters

As K-C brings Better Care for a Better World, we are committed to doing what's right for our people, our business and our planet and promoting and supporting human rights.

We're committed to ensuring that workers around the world - including those of our suppliers - and others potentially impacted by our global operations and supply chains are treated with respect.

## The K-C Way

This Policy sets minimum expectations and applies to all K-C employees, operations, and business units globally. We outline similar expectations for K-C suppliers and business partners in our Supplier Social Compliance Standard.

As part of our purpose-led, performance-driven culture, we have designed this Policy to be consistent with international human rights standards, including the *United Nations' (UN) Guiding Principles on Business and Human Rights*, the *UN Global Compact*, the *UN Universal Declaration on Human Rights*, the *International Labour Organisation's (ILO) Declaration on Fundamental Principles and Rights at Work*, as well as standards in other initiatives to which we subscribe, including the *Ethical Trading Initiative Base Code (ETI Base Code)*.

Where local law is less stringent than this Policy, we will seek to follow the higher standard whenever possible. Where there are conflicts, we will adhere to local law, while seeking ways to respect the principles behind this Policy to the greatest extent possible.

K-C supports global human rights in a number of ways. In general, our policies include the following:

### **1. We promote Fair Labor Practices for all workers, whether employed directly by K-C or as part of K-C's value chain**

K-C respects workers' rights to freedom of association, including the right to independently decide whether or not they want collective bargaining through representatives of their own choosing, the right to engage in other protected group activities, and the right to refrain from such activities.

We prohibit physical, mental, and sexual abuse of workers, as well as deductions from wages as a disciplinary measure.

We compensate workers relative to our industry and the local labor market and strive to operate in full compliance with applicable law.

To every extent possible work performed must be on the basis of recognized employment relationships established through national law and practice. While alternate contracting models may be deployed, their purpose or effect should not be to avoid obligations to workers under labor or social security laws and regulations.

## **2. We prohibit and work to prevent the use of child labor**

K-C prohibits the recruitment, employment, or engagement of children under the age of 15 years and the exploitation of children in any way. Where local law is less stringent than this Policy, we will seek to follow the higher standard whenever possible. Where there are conflicts, we will adhere to local law, while seeking ways to respect the principles behind this Policy to the greatest extent possible.

If children under the age of 15 are found to be working directly for a site or supplier, the site or supplier shall implement an immediate remediation plan that keeps the best interest of the child in mind, such as transitioning her/him to attend and remain in education until no longer a child.

## **3. We prohibit and seek to prevent forced labor and human trafficking**

Kimberly-Clark prohibits the use of all forms of forced labor, including all forms of incarcerated labor, indentured labor, bonded labor, or slave labor and the human trafficking associated with such abuses. Specifically, 1) every worker should have freedom of movement, 2) no worker should pay for a job (in the event workers are found to have paid fees, these must be fully reimbursed in a timely manner), and 3) no worker should be indebted to or coerced to work by his/her employer and/or labor agent/broker.

## **4. We promote a safe and healthy work environment**

Kimberly-Clark is committed to providing a secure, safe, and healthy workplace for all workers. For more information see our Occupational Safety & Hygiene Policy.

Environment, Health & Safety (EHS) requirements must be clearly defined and communicated to contractors prior to any on-site work. The contractor must conduct all work on-site in a manner that complies with all applicable regulations and K-C EHS Performance and Management System standards.

## **5. We ensure working hours respect worker safety & legal requirements**

Kimberly-Clark is committed to ensuring that workers do not work excessive hours and do not work more than the maximum legally permitted by applicable law, and as described more fully in the Instructions to this Policy. All overtime must be voluntary unless collectively bargained by the workers' elected representatives.

## **6. We prohibit discrimination and harassment**

Kimberly-Clark recognizes universal human rights on a global basis and encourage the abolition of discriminatory laws and practices. For more information, see our [Equal Opportunity Policy, Including Anti-Discrimination, Anti-Harassment, and Anti-Retaliation.](#)

## 7. We respect land and property rights

Kimberly-Clark respects the rights and title to property and land of the individual, indigenous people and local communities. For more information, see our [Fiber Procurement Policy](#).

## 8. We protect and preserve the environment

K-C protects and preserves the environment, including ensuring that all waste is managed responsibly and that communities' access to water is not negatively impacted by operations. For more information, see our [Environmental Policy](#).

### Human Rights Oversight and Remediation

K-C's Responsible Sourcing Steering Committee will establish, review, and regularly update 1) Instructions to this Policy that define compliance expectations for K-C operations and 2) a Supplier Social Compliance Standard (SSCS) that sets compliance expectations for K-C suppliers. K-C will develop and deploy risk assessment, human rights due diligence, risk mitigation and training programs; and will monitor and report on our human rights progress and impact annually, including as required by local modern slavery legislation.

In accordance with the UN Guiding Principles on Business and Human Rights, K-C will strive to provide effective remediation where we may have caused or contributed to adverse human rights impacts. If we find impacts directly linked to our business relationships, we will influence our suppliers or business partners to prevent, mitigate and address adverse impacts on human rights.

## What's Expected

### Procurement Responsibilities

K-C suppliers are expected to comply with the SSCS, and compliance shall be weighed heavily in supplier selection and retention decisions. If a supplier refuses to comply with the SSCS, approval for new or incremental business will require review and approval by the Steering Committee as well as endorsement by a member of the Executive Leadership Team. In addition, any actual or suspected violation of this Policy or the SSCS by a supplier (including subcontractors and upstream suppliers), shall immediately be brought to the attention of a Steering Committee member and/or Legal.

### Team Leader Responsibilities

Each business unit and functional leader is responsible for ensuring the implementation of this Policy and shall ensure that his or her organization operates in full compliance with all applicable legal, regulatory, and K-C requirements.

To accomplish this, all levels of management within each business unit and function must be knowledgeable about related K-C Policies and Procedures and conduct business accordingly.

Leaders also have a responsibility to create an open environment where every employee feels comfortable raising questions and concerns without fear of retaliation. If someone raises a question or concern about possible misconduct, including violations of K-C policy or law, promptly contact the K-C HelpLine or your Regional Compliance Leader. In those situations, team leaders should not conduct their own review and should seek assistance.

### Employee Responsibilities

Responsibility for ensuring compliance with this Policy is assigned to all K-C employees including business unit and functional leaders, team leaders, and those with specific roles, responsibilities and accountabilities established as follows.

This Policy extends to all aspects of employment and engagement practices, including recruitment, hiring, promotion, demotion, transfers, layoffs, recalls, discharges, reorganizations, reductions in force, terminations, compensation, benefits, training, education, education assistance, and social and recreational programs.

### When to Ask a Question or Raise a Concern

Each of us has an obligation to ask questions or raise concerns if we suspect that misconduct has occurred, or if a K-C employee or third party acting on behalf of K-C has violated the K-C Code, K-C policies, or laws. You do not need to be certain that a violation has occurred before speaking up.

### How to Ask a Question or Raise a Concern

Generally, your team leader or another business leader will be in the best position to resolve a compliance question or concern.

If you are not able to resolve the question or concern with your team leader or another business leader, or if you do not feel comfortable approaching these leaders, K-C offers several methods for raising questions and concerns. You can speak to one of your business partners in Legal, Global Ethics & Compliance, Global Security, Finance, Human Resources, or the anonymous and confidential channels available under the K-C HelpLine.

## K-C HelpLine

You can also ask a question or raise a concern using the K-C HelpLine. If you contact the K-C HelpLine, please specify who was involved, who might have direct knowledge of the incident, what occurred, when it occurred, and why you think it happened. This type of specific information will allow us to conduct a thorough and fair evaluation. You may contact the K-C HelpLine anonymously (where permitted by law), but we encourage you to provide us with contact information so that we can reach you with any follow-up questions.

The K-C HelpLine is available 24-hours a day, 7-days a week, in native languages where K-C's facilities are located. A professional company that is independent of K-C will take your information and then promptly report it to the Global Ethics & Compliance team for review. You may contact the K-C HelpLine directly by telephone, e-mail, or web:

- Telephone:
  - 1-844-KC-HELP1 or 1-844-524-3571 (United States)
  - For local or toll-free HelpLine numbers in other countries, see [www.KCHelpLine.com](http://www.KCHelpLine.com)
- E-mail: [KCHelpLine@kcc.com](mailto:KCHelpLine@kcc.com)
- Web: [www.KCHelpLine.com](http://www.KCHelpLine.com)

We encourage you to ask your questions and raise your concerns directly to K-C so we can take appropriate actions. But, nothing in this Policy prevents you from reporting potential violations of law to relevant government authorities.

## Our Anti-Retaliation Commitment

K-C does not tolerate retaliation against anyone who raises a concern in good faith or who cooperates in a review. Individuals engaging in this type of retaliatory conduct will be subject to discipline action. If you believe someone has retaliated against you or against someone else, raise a concern immediately. Our anti-retaliation commitment is further described in our [Compliance HelpLine Reporting Policy](#).