Code of Conduct

2027



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As employees and stakeholders of WD-40 Company including all our subsidiaries and branches, (collectively, "Company"), we each have ethical and legal responsibilities to uphold. This Code of Conduct is intended to help us understand them and to provide us with a point of reference to help us all – employees, officers, and directors – conduct business and make decisions ethically, legally, responsibly and in accordance with our values. As a global company, we are required to comply with local laws in all jurisdictions in which we conduct business. Some laws may impose higher standards of conduct than the standards set forth in this Code of Conduct. In addition, our Company policies for employees serving in local offices may impose higher standards of conduct. For example, in some jurisdictions, we may impose lower limits on permissible receipt of gifts than the limits included in this Code of Conduct. The standards of conduct set forth in this Code of Conduct are intended to represent minimum standards applicable to all employees. We are all responsible for understanding specific Company policies that apply to each of us.

DOCUMENT:
WD-40 Company Code of Conduct

DOCUMENT MANAGED BY:
Global Ethics & Compliance Committee

APPROVED BY:
Board of Directors on October 8, 2026

This Code of Conduct has been translated into foreign languages for global distribution to all employees. We are all encouraged to present questions or concerns at any time. Please refer to the information below under the heading "Reporting Concerns" for alternative means by which you may present your questions or concerns. Any communication to the email addresses provided in this Code of Conduct may be presented in your native language.

A Message from Steve



Greetings,

As a WD-40 Company employee for over 35 years, I have experienced many changes in our organization. One thing that has held constant over the years is our commitment to our values. We are a purpose-driven organization guided by a strong set of values that form the foundation of our wonderful culture. These values have always supported our purpose and shaped the decisions we make in our daily work. We recognize that living by our values can sometimes require careful consideration. To guide us through these moments, our values are hierarchical, with each value playing a critical role. When applied in order, they work together—never in competition—to drive consistent, aligned, and values-driven outcomes. At the top of this list, above all else, is our first and most important value: At WD-40 Company, we do the right thing.

Our values play a critical role in aligning the company towards achieving our 2030 objectives and beyond. Our Code of Conduct sets standards to help us ethically navigate that path. Together these critical tools guide us to ensure we do the right thing in all our daily actions, interactions, and decision-making.

Our Code of Conduct also plays an integral role in sustaining our trusted reputation that we've worked hard to build for over 70 years. This policy and its principles apply to all WD-40 Company employees and our Board of Directors. It sets standards for how we should conduct ourselves, both professionally and personally, whenever and wherever we conduct business.

If you encounter a difficult situation that may have ethical implications or could possibly compromise your personal or professional responsibilities, it is imperative that you own it and act on it immediately. First consult this policy and review our values for guidance. No Code of Conduct can encompass every ethical situation that may arise. If you need additional counsel don't hesitate to seek support from your coach or a member of our management team.

Accountability is a key element of any Code of Conduct. As an employee, your role and responsibility in learning, understanding, living our values, and adhering to our Code of Conduct are important. I ask that you read it carefully, seek answers to your questions, share suggestions, and most importantly leverage it to always do the right thing.

Warm regards,

Steve

Steve Brass
President, Chief Executive Officer and Board Member

Supporting Our Reputation

The Three Pillars



The reputation of WD-40 Company ("Company") rests firmly upon three pillars: Our Values, Our Brand, and Honest Public Reporting. Since our Company's founding in 1953, our values have guided us in making uncompromising decisions for the realization of our goals. Our quality assurance and brand protection efforts keep our Company's name synonymous with excellence. Honest and transparent public reporting of financial results and disclosure of information to our investors demonstrate our Company's integrity to the world. Together, these pillars create an enduring base from which we can achieve long-term success.

Our reputation and success depend upon the decisions and actions of our people – all over the world. We are committed to ensuring every action we take honors our values and is in full compliance with the law and this Code of Conduct.

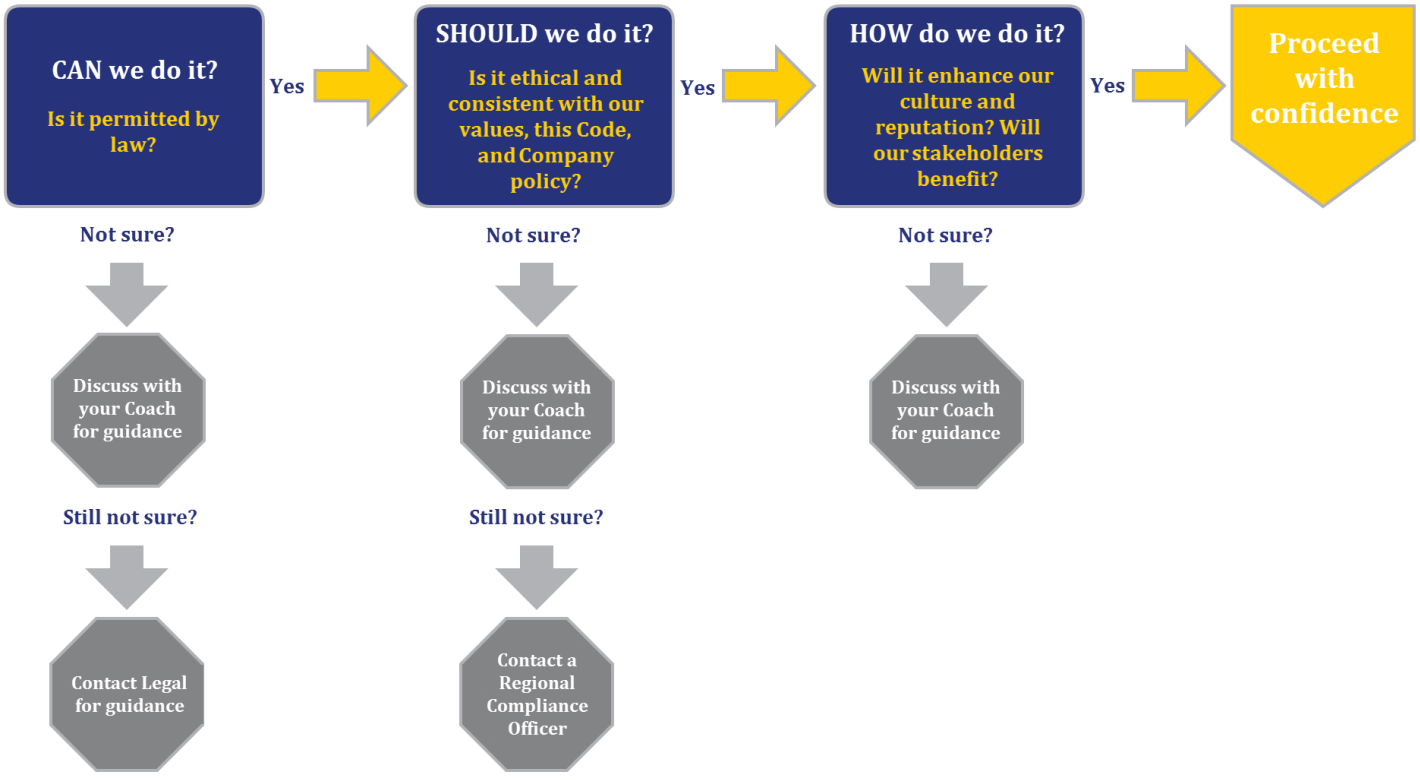
Our Values at Work

Just as our Company vision provides us with a sense of direction, our values lead us down the right road. Unless values are lived by and demonstrated in our work and the choices we make every day, they have no meaning. Our values are:

1. We value doing the right thing.
2. We value creating positive lasting memories in all our relationships.
3. We value making it better than it is today.
4. We value succeeding together while excelling as individuals.
5. We value owning it and passionately acting on it.
6. We value sustaining the WD-40 Company economy.

WD-40 Company's values are ranked-ordered to understand priority and to avoid any conflicts. When applied in order, they work together—never in competition—to drive consistent, aligned, and values-driven outcomes. When it is impossible to honor two values at the same time, our first value outweighs all others: we value doing the right thing. For example, it is unacceptable to create a positive lasting memory for a customer if what you're doing is illegal and/or unethical. Similarly, ranking our financial value last does not mean it is unimportant – it is one of our core values – but we do nothing to drive economic value that isn't consistent with all of our other values. Doing the right thing is always at the top of our list and all of our values guide our day-to-day decision-making.

How do we make effective decisions consistent with our values?



Guidelines for effective decision-making and attention to our values:

- Stop and think – One of the most important steps to better decision-making is to think ahead. To do so it's necessary to first stop long enough to permit calm analysis.

- Clarify goals – Before you choose, clarify your short- and long-term aims.
- Determine facts – First resolve what you know, then what you need to know. Be prepared to get additional information and to verify assumptions.
- Develop options – Now that you know what you want to achieve and have made your best judgment on the relevant facts, make a list of actions you can take to accomplish your goals.
- Consider consequences – Filter your choices through our values. Then identify the stakeholders and how the decision is likely to affect them.
- Choose – Talk to people whose judgment you respect. Ask yourself, what would the most ethical person you know do? What decision would you make if you were sure everyone would know?
- Monitor and learn – What happened as a result of your decision? If there is a lesson to be learned, make note of it.

The Strength of Our Brand

Our two most important assets are our people and our brand. Together they represent our good Company name. Our Company name is synonymous with the value, excellence, and reputation of our iconic WD-40® Brand blue and yellow shield. This Code of Conduct guides us in the protection of our brands and the reputation they represent.

To protect our brands, we protect our registered trademarks and trade secrets and we follow our brand guidelines. Our brand guidelines dictate the manner in which we refer to our branded products, not only on our product labels and in advertising and marketing materials, but also in all our external communications, including those via social media.

Our reputation is inside every container of product we produce and sell, every product we market implies a promise: consumers can trust the quality of our brands. Our quality assurance initiatives are not limited to considerations of product quality, but the quality in everything we do.

Associated Document:

- *WD-40 Company Brand Guidelines*
- *Trade Secret Notice*

Honest and Transparent Public Reporting

Honest and transparent public reporting is an important pillar of support for our reputation. We rely upon accurate information and strong financial controls to make effective business decisions. Our investors rely on the integrity of our reports and disclosures to maintain their confidence in our business.

What does this mean to us as employees? Although we have finance, accounting, and legal personnel who are responsible for our public reporting, we all share a responsibility for the proper identification and timely reporting of business transactions and for adherence to policies and procedures that allow us to maintain this important pillar of support.

It is WD-40 Company's policy to keep accurate and detailed books, records, and accounts in order to fairly reflect all transactions and the management of Company assets. Ultimately, any transaction that may adversely affect the Company's reputation or that could compromise WD-40 Company's compliance with applicable laws must be avoided.

Employees are encouraged to report any suspected illegal activities or suspected violations of this Code of Conduct. Reports can be submitted to management directly or submitted anonymously through the Reporting Hotline (see Appendix A). Company policy strictly prohibits retaliation, and no Company policy or agreement is intended to limit or discourage reporting of concerns to law enforcement agencies.

Ethical Standards

Guidance For Compliance and Ethical Conduct



Ethical standards guide us in understanding what is right, good, and appropriate behavior. While they do not always point to a single "correct" or "moral" course of action, they offer a framework for evaluating options and making thoughtful decisions. The principles below help us navigate those choices with integrity:

- Trustworthiness
- Respect
- Responsibility
- Fairness
- Caring
- World and Community Impact
- Sustainability

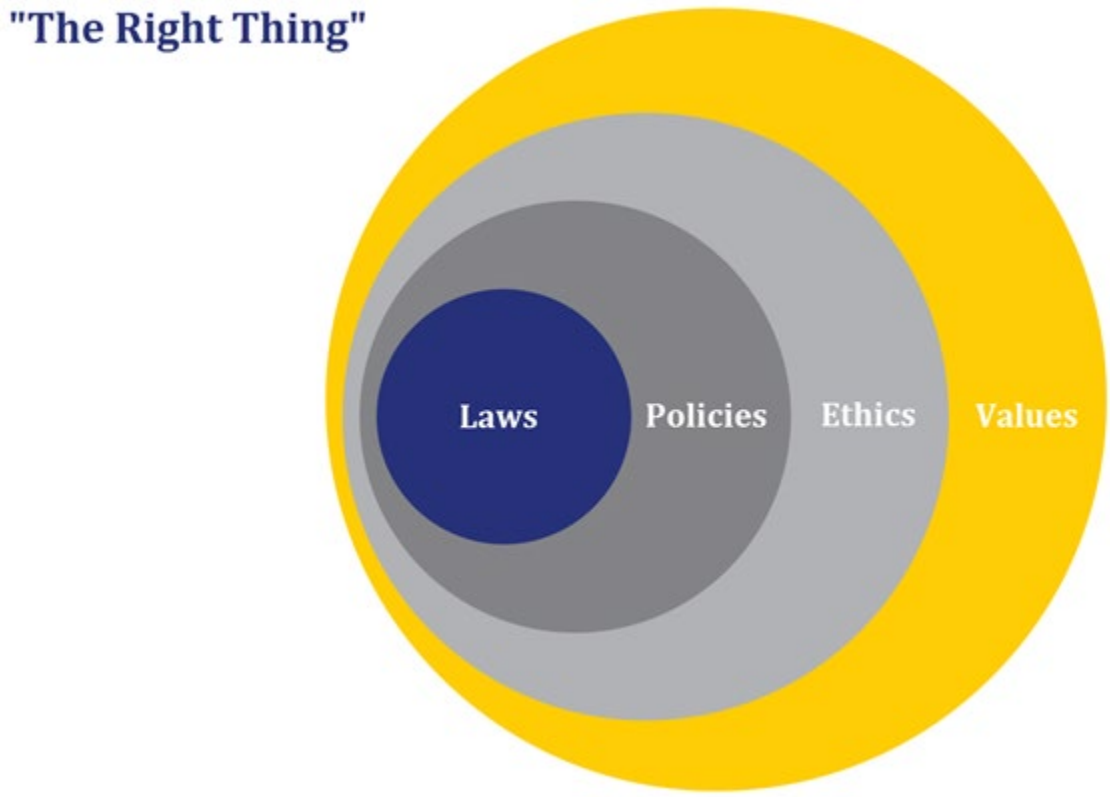
What are we responsible for?

We place great value on the integrity of our people and our business reputation. Even though customs may vary from country to country, honesty and integrity must always characterize our business activity. We will not achieve results at the cost of violating laws or regulations or through unfair or disrespectful dealings. Our adherence to this Code of Conduct is assessed in our performance evaluations through review of our demonstration of our corporate values.

Simply put, we all are responsible for ethical behavior. Ethical behavior requires us to:

- Act in good faith, responsibly, with due care, competence, and diligence, without misrepresenting material facts or allowing one's independent judgment to be subordinated.
- Proactively promote ethical behavior as a responsible partner among peers in the work environment.
- Make decisions based on merits and fairness and not through manipulation, misrepresentation, concealment, violation of confidentiality, or other unfair practices.
- Consider our responsibilities under this Code of Conduct and ensure our consistent compliance with all Company policies and procedures.

In summary, to do the right thing, we must be mindful of myriad external and internal considerations simultaneously. Laws and policies may differ in the many geographies where our employees do business. However, our ethics and values are expected to be universally shared by our employees and are most pertinent to the work we do and the way we do it.



Financial Code of Ethics for Senior Financial Executives

As a publicly traded company, it is essential that we report our financial results with objectivity and the highest degree of integrity. Laws, regulations, and rules have been established that require our Senior Financial Executives ("Senior Executives") to adhere to a specific code of ethics as discussed below. For this purpose, Senior Executives include our CEO, Trading Bloc Leaders, CFO, Chief Accounting Officer, Global and Trading Bloc Controllers, Treasurer, Tax Director, Internal Audit Director and other accounting and financial leaders at the director level and above. This Financial Code of Ethics is intended to promote honest and ethical conduct, compliance with applicable laws, and full, fair, accurate, and timely disclosure in the Company's public communications and financial reports.

Core elements of this Financial Code of Ethics include the following:

1. Honest and Ethical Conduct – Senior Executives shall act with honesty and integrity. They must adhere to and promote honest and ethical behavior, including proper handling of actual and apparent conflicts of interest between personal and professional relationships. Service to the Company takes precedence over personal gain and advantage.
2. Honest Financial Disclosures – Senior Executives shall ensure that documents filed with the SEC, as well as public communications to investors and other stakeholders, contain full, fair, accurate, timely and understandable disclosures. Due care is to be exercised when preparing such communications to ensure they are not misleading or incomplete. Do not take any action to fraudulently influence, coerce, manipulate or mislead the Company's independent registered public accounting firm, the Company's internal auditors or the Audit Committee of the Board.
3. Comply With Laws – Senior Executives shall comply with all laws, rules and regulations, especially those specific to securities and financial reporting.
4. Promptly Report Violations – Senior Executives shall report any suspected violations of this Financial Code of Ethics promptly to the Audit Committee Chair, Board of Directors Chair, or Chief Compliance Officer. Use of the anonymous hotline is encouraged; and Senior Executives should ensure that no retaliation takes place against those who report violations in good faith.
5. Support Accountability and Adherence – Senior Executives are responsible for adhering to this Financial Code of Ethics and promoting accountability within the Company as a whole. Failure to comply is subject to disciplinary action, up to and including termination of employment with the Company. Any waiver of provisions of this Financial Code of Ethics may be granted only by the Company's Board of Directors and will be promptly disclosed to stockholders in accordance with such laws, rules or regulations.

The Senior Executives bear a special responsibility for acting with integrity and promoting it throughout the organization, with responsibilities to stakeholders both inside and outside of the Company. They have a special role - both to adhere to these principles themselves and to ensure that a culture exists throughout the Company as a whole - that ensures the fair and timely reporting of the Company's financial results and condition by the entire organization. This effort can only be successful with the full and complete support from the entire organization. Accordingly, all employees, even if their roles are not related to financial reporting or disclosures, are asked to emulate this Financial Code of Ethics in its intent and spirit in the performance of their respective jobs and duties to the extent applicable.

Conflicts of Interest

A conflict of interest ("COI") exists when our personal or financial interests could potentially, or do in fact, interfere with our ability to make appropriate, unbiased business decisions in our roles for the Company. Situations where a COI could arise are when an employee takes actions or has interests that may make it difficult to perform Company

work objectively and effectively, or when an employee (or family member or close friend) receives improper personal benefits because of an employee's position in the Company. COIs not only include actual conflicts, but also potential conflicts, as well as situations that could create the appearance of a COI.

COIs can involve personal interests, financial interests, or both. Personal interests are generally relationship-based and include both family members and friends (both romantic and/or platonic), while financial interests include, among other things, personal investments in other companies, outside activities or other employment, and business opportunities. The following are examples of COIs that must be disclosed:

- An employee has a close personal friend who works for a supplier, customer, or competitor;
- An employee has a close family member with an equity investment in a company that is a supplier of WD-40 Company; and
- An employee has a second part-time job working for another company.

These examples are by no means an exhaustive list of COIs, as there are numerous situations involving personal or financial interests that could lead to a potential or actual COI. These examples may not contain enough information to determine whether an actual COI exists, but they do highlight the need for disclosure: employees should err on the side of caution and when in doubt, please disclose. Only by bringing it to the Company's attention can a COI be appropriately managed. Remember, this is not only for the Company's protection, but also for all of its employees, officers, directors, agents, marketing distributors, and other closely-related third parties.

Please see the Company's *Conflict of Interest Policy* for more information as well as procedures for disclosure and policy acknowledgement.

As employees, we devote our undivided service to the Company for the performance of our assigned responsibilities. While we are employed by the Company, we may not accept employment with or otherwise provide services to a competitor, supplier or vendor, or a customer of the Company. Subject to local laws, local requirements and your employment agreement as applicable, outside activities, interests, and employment are otherwise acceptable so long as they do not interfere with your job and expected performance, involve conflicts of interests for your job, involve use of Company resources, assets or commercial relationships, or otherwise risk damage to the Company's reputation. If you are unsure about whether such outside activities are permitted, please speak to your coach or relevant Human Resources personnel.

Associated Policies:

- *Conflict of Interest Policy and Disclosure Form*

Gifts, Hospitality and Charitable Donations

The Company recognizes that gifts, hospitality, and charitable giving (collectively "gifts") can help in establishing or strengthening relationships, both with our customers and business partners, and also with the communities, cities and countries where we live and work, so long as it is done responsibly and in compliance with laws and our policies. Employees should keep in mind the following main points with respect to gifts:

- Appropriate: Gifts, whether given or received, must be consistent with our Company values. Lavish gifts, meals, entertainment and travel expenditures are prohibited.
- Budgeted: Giving gifts must be within the giving employee's budget authority.
- Legitimate: Giving or receiving gifts must have a legitimate business purpose, and cannot be for personal benefit or to improperly influence a business decision;

- Value Limits: The value of a gift (whether giving or receiving) should not exceed the lower of $500 or the applicable value limit established by the Company's local office.
- No Government Officials: Gifts to government officials are prohibited. Please note that, subject to applicable laws, government officials may be able to accept de minimis promotional items (such as hats, t-shirts, pens, miniature-sized product samples) or snacks and refreshments provided at Company-sponsored events open to the public or widely attended, as these are excluded from the definitions of gifts and hospitality under the Company's *Gift, Hospitality and Charitable Donations Policy*.
- No Cash: Gifts of cash (including cash equivalents such as gift cards or prepaid credit/debit cards) are prohibited.
- Properly Recorded: All employees are responsible for ensuring appropriate documentation for giving or receiving gifts.

Please note that local laws may be more restrictive and if there is a conflict between the Company's *Gift, Hospitality and Charitable Donations Policy* and local laws, the more restrictive requirement governs. It is every employee's responsibility to check with the Company's local office manager or Regional Compliance Officer with questions or to seek clarification.

Giving or receiving gifts or hospitality having a fair market value in excess of USD $200 (or local currency equivalent) should be discussed with your coach prior to giving or accepting.

Please refer to the Company's *Gift, Hospitality and Charitable Donations Policy* for all requirements, prohibitions, and further details for gifts.

Employees should also consider our values, including sustaining the WD-40 Company economy, before incurring reimbursable internal expenses that are not covered by our Gift, Hospitality and Charitable Donations Policy such as business-related travel, entertainment, meals, and gifts among employees. Employees are reminded that such internal expenses must be in accordance with the expense policies and procedures applicable to their country or region and should consult their Human Resources department for more information.

Associated Policies:
- *Gift, Hospitality and Charitable Donations Policy*
- *Conflict of Interest Policy and Disclosure Form*
- *Anti-Corruption Compliance Policy*

Export Control and Trade Sanctions Compliance

The Company is committed to complying fully with all applicable laws and regulations related to export controls and trade sanctions, both in the U.S. and other jurisdictions where we conduct business. These laws and regulations—which are constantly changing to reflect changes in global circumstances—can restrict or prohibit where, with whom, and how we conduct our business around the globe. Failure to comply with these laws can lead to business disruption, harm to the Company's reputation, loss of export privileges, and/or significant civil and criminal penalties. The Company is therefore committed to regularly screening all current and potential customers and vendors to ensure compliance.

Our employees are our first line of defense in identifying and preventing potential sanctions or export control violations, and it is everyone's responsibility to protect against such violations, including directors, officers, employees, and consultants of the Company and to report any concerns to your coach, the General Counsel, a Regional Compliance Officer, or a member of the Global Ethics and Compliance Committee or via the Reporting

Hotline. Please see our *Export Control and Trade Sanctions Compliance Policy* for more policy details and procedures related to screening.

Associated Policies:

- *Export Control and Trade Sanctions Compliance Policy*
- *Anti-Corruption Compliance Policy*

Anti-Corruption

WD-40 Company expects compliance with the highest ethical standards including all applicable anti-corruption laws, including, but not limited to, U.S. Foreign Corrupt Practices Act of 1977, U.K. Bribery Act of 2010 and other anti-corruption laws and regulations of countries in which we do business, and the Company's Anti-Corruption Compliance Policy in the conduct of its business. The Company values integrity and transparency and has no tolerance for corrupt activities of any kind, whether committed by Company employees or by third parties acting for or on behalf of WD-40 Company.

In general, unauthorized payments, or acts that create the appearance of promising, offering, giving or authorizing payments prohibited by Company policies or applicable laws, are not tolerated. More specifically, payments or gifts of money or anything of value to individuals, whether government officials or employees of another business, for the purpose of influencing actions, inducing a violation of duty, or securing an improper advantage to obtain or retain business for the Company are prohibited. Note that this prohibition does not include properly approved promotional programs or business-related gifts and hospitality activities that comply with the Company's *Gift, Hospitality and Charitable Donations Policy*.

Corrupt behavior encompasses more than unauthorized payments and can include other fraudulent behavior, such as misrepresentation, financial misstatements, or fraudulent trading that results in an improper benefit to the Company. An example of this would be an employee or agent misrepresenting the quality of a Company product to increase sales. Accordingly, these types of fraudulent behavior are a violation of this policy and are also prohibited. Because anti-corruption laws apply to the conduct of both Company employees and third parties acting for or on behalf of the Company, it is the Company's obligation to "know its partners." The Company must ensure that any third parties with and through whom it conducts business acknowledge and agree to comply with Company anti-corruption-related policies.

Employees are reminded that local Company offices may have additional restrictions in order to comply with local laws related to anti-corruption. It is every employee's responsibility to check with the Company's local office manager or Regional Compliance Officer with questions or to seek clarification. Please note that local laws may be more restrictive and if there is a conflict, the more restrictive requirement governs.

Associated Policies:

- *Anti-Corruption Compliance Policy*
- *Gift, Hospitality and Charitable Donations Policy*

Third-Party Due Diligence

Because the Company relies on third-party business partners for key aspects of our business operations, our business can be negatively impacted by government actions involving a third party, or other adverse events affecting a third party's ability to perform. The Company is committed to conducting appropriate due diligence on all prospective and current third parties to:

- ensure compliance with applicable legal and regulatory requirements and applicable Company policies; and
- aid the Company in managing and mitigating third-party risk.

The Company manages due diligence through initial screening and ongoing monitoring to ensure that current or prospective third parties are not:

- on any global government-sanctions lists that would prohibit or restrict a business relationship;
- subject to any legal or regulatory enforcement actions;
- associated with politically exposed persons; or
- involved in activities that would prohibit or restrict the Company's ability to engage in a business relationship.

These third-party due diligence procedures apply to all third parties including:

- Vendors (e.g., raw material suppliers, packaging manufacturers, mixers and fillers, warehouses, transporters, agents, or other service providers);
- Marketing distributors; and
- Customers, including both contractual and purchase-order-based buyers.

Because of their significance, any prospective third party being considered for a contractual business relationship that would be classified as Tier 1 under the Company's Global Contract Administration Policy must undergo initial due diligence and review of a detailed diligence report prior to entering into a contract. Company employees are able to initiate Tier 1 due diligence requests by completing a Due Diligence Intake Form available on the Company's internal website.

Associated Policies and Procedures:

- *Export Control and Trade Sanctions Compliance Policy*
- *Anti-Corruption Compliance Policy*
- *Due Diligence Intake Form*
- *Global Contract Administration Policy*

Intellectual Property, Confidential Information and Trade Secrets

We protect the Company's intellectual property, confidential information, and trade secrets by creating and innovating internally whenever possible. Any inventions, developments, designs, formulas, processes, improvements, or other work created in connection with your job or using Company resources must be treated as Company intellectual property ("IP") and handled in a way that preserves the Company's ownership rights. Do not use third-party ideas, content, creations, or services to develop IP-related solutions unless internal options have been fully explored; in most cases, this requires prior approval from the Vice President, Global Research and Development and the Vice President, General Counsel so appropriate ownership and protection steps can be confirmed. Please note that suppliers merely providing raw materials, component parts, or packaging materials are not considered "third-party IP solutions" and do not require this approval.

Confidential information, IP and trade secrets are the Company's most valuable business assets. A trade secret is information that is kept secret and provides economic value or a competitive advantage to the Company and is not readily known or ascertainable by third parties. A trade secret enjoys greater legal protections than other types of confidential information. Trade secrets lose their protection if they are disclosed intentionally or accidentally. Accordingly, trade secrets must be kept secret.

All businesses rely on confidential information. Not only do we need to protect our trade secrets (such as our formulas, manufacturing processes, failed experimentation, scientific research and development, and lists of customers, suppliers, and vendors), but we all regularly work with confidential business information that we need to think about as we decide what to share with others. We must respect the confidentiality of information acquired from others in the course of our work except when properly authorized or we are legally obligated to disclose. We need to confirm that we have an appropriate non-disclosure agreement in place before we establish new business relationships with consultants and others with whom we may share our confidential business information, including trade secrets.

It is critical that all employees protect the interests of WD-40 Company by ensuring that all confidential information and trade secrets remain confidential at all times, including when in the workplace, travelling, and working from home. Further, no employee, officer, or director should disclose private or confidential information regarding another employee, officer, or director. Confidential information and trade secrets acquired in the course of one's work is to be used only for legitimate Company business and may not be used for personal advantage.

Associated Policies and Documents:

- *Trade Secret Notice*
- *IP Ownership Policy*
- *Global Electronics & Telecommunications Policy*

Protection of Company Property

The protection of Company property is an important responsibility for every employee. Our business success depends upon the integrity of all our business assets. This includes not only our intellectual property (proper application of our brand guidelines), but also all our physical property, including our offices, computer and telecommunications equipment, vehicles, and supplies. We must use Company property carefully and only for Company business purposes. Theft, embezzlement, or misuse of Company property is a serious offense and will result in appropriate disciplinary action, up to and including termination of employment. Such misconduct may also result in criminal prosecution.

Insider Trading

"Insider trading" is a term most of you have heard and probably associate with specific individuals who have been designated as an "insider"— officers, specific employees, and directors —because in the course of their work they have access to material nonpublic or inside information. Insider trading is using such material nonpublic information for personal financial gain (and could include trading to avoid a financial loss). There are special rules and procedures that "insiders" must follow.

However, "insider trading" rules apply to the entire company. In the course of your work, you may have access to information about WD-40 Company that is not known to the general public. Maybe you overhear a hallway conversation or come across an email or other documents left at a printer or conference room. Never misuse or improperly disclose material nonpublic information about WD-40 Company or another company. The following rules apply worldwide to every employee of WD-40 Company:

- Never buy, sell, or otherwise transact in securities of WD-40 Company or any other publicly traded company when you are in possession of inside information about that company. In addition to stock, securities include options, futures, calls, puts, warrants, debt securities, and any other rights to acquire stock.
- Do not disclose inside information to anyone outside of WD-40 Company including spouses, family members, or friends.

- Only share inside information with others internally on a "need-to-know" basis and ensure the recipient understands the sensitive nature of the information.
- Take care to protect inside information from accidental disclosure.
- Do not engage in "tipping," which means passing along inside information to anyone who may use the information for their financial or other personal benefit.
- **When in doubt, just remember: no talking, no telling, no trading, and no posting.**

Using inside information for your financial or other personal benefit or sharing this information with others in the absence of a need-to-know constitutes a violation of this Code of Conduct and may also violate the law. Employees and directors who violate these rules are subject to dismissal in addition to civil liability and/or criminal prosecution.

What is material nonpublic or "inside" information?

Nonpublic information is generally considered "material" if there is a substantial likelihood that a "reasonable" investor would consider it important in a decision to buy, sell, or hold securities. Examples include, not limited to:

- *company sales / revenue or earnings projections or other guidance,*
- *financial results,*
- *a change in the dividend rate or policy,*
- *stock repurchases or buy-backs,*
- *significant new business relationships,*
- *new product launches or significant product developments,*
- *proposed investments, acquisitions, divestitures, or merger transactions,*
- *important developments in litigation, and*
- *significant changes to senior management.*

Associated Policies:
- *Insider Trading Policy and Guidelines*

Fair Competition

The Company is committed to competing vigorously, fairly, and independently in all markets where we do business. We succeed by offering high-quality products and services—not by engaging in unfair, deceptive, or unlawful practices. All employees must comply with applicable competition and antitrust laws worldwide.

Violations of fair competition laws can result in severe consequences, including government investigations, significant financial penalties, criminal liability for the Company and individuals, private lawsuits, and serious reputational harm.

<u>What This Means in Practice</u>

Global competition laws generally prohibit conduct that restricts or distorts competition. Key risk areas for WD-40 Company include:

Dealings with Competitors

- Employees must never enter into any agreement, understanding, or coordination—formal or informal—with competitors regarding prices, pricing strategies, discounts, customers, territories, markets, bids, or production.

- Agreements can be inferred from conduct and do not need to be written or spoken to be unlawful.
- The Company must never act as a conduit for competitively sensitive information between competitors.

Competitor Information

- Non-public, competitively sensitive information about competitors—especially pricing, discounts, costs, or future plans—must not be exchanged, requested, or used.
- Competitor information may only be obtained from lawful and legitimate sources, such as publicly available information or information received from customers without solicitation.
- Employees must document the source of competitor information and immediately contact the Legal team if confidential competitor information is received unintentionally.

Pricing, Discounts, and Allowances

- Fair competition laws may restrict charging different prices, discounts, rebates, or allowances to similarly situated customers for the same products.
- Pricing differences must be based on legitimate, objective factors such as volume, logistics, or documented promotional or service differences.
- Discounts, rebates, and allowances should be functionally available to, and proportionally equal for, competing customers within the same geographic market or distribution channel.

Distributors, Customers, and Vertical Arrangements

- Conditions imposed on distributors or customers—such as resale pricing restrictions, exclusivity, territorial limits, or customer limitations (e.g., such prohibiting a distributor from selling a competitor's product in geographic or product markets where the availability of competing products is limited) —can raise significant competition law risk depending on jurisdiction.
- Tying and bundling arrangements (for example, requiring the purchase of one product to access another, or offering bundled discounts) may be lawful in some cases but can raise heightened scrutiny where the Company is perceived as a market leader.

Your Responsibilities

- Make independent business decisions based on the merits of WD-40 Company products and services.
- Avoid discussions or conduct that could give the appearance of coordination with competitors.
- Be especially careful at trade association meetings, industry events, and informal business settings.
- When in doubt, stop and seek guidance.

Seek Legal Guidance:

You must contact the Legal team:

- Before implementing new or modified pricing, discount, rebate, or allowance programs;
- Before entering into or changing distributor or customer restrictions, exclusivity, or bundling arrangements;
- Before participating in discussions with competitors; or

If you have any uncertainty about permissible competitive conduct.

The Company has adopted a Fair Competition & Antitrust Policy, which provides more detailed guidance and examples. All employees are expected to comply with both this Code of Conduct and the stand-alone policy.

Associated Policy:

- *Fair Competition Policy*

Corporate Disclosure

As a public company, we are subject to Regulation Fair Disclosure ("Reg. FD"), which prohibits the selective disclosure of material, nonpublic ("inside") information to anyone in the investment community. We strive to provide the public with information that is timely, accurate, transparent, consistent, credible, and in compliance with the applicable legal requirements to which the Company is subject.

There's a big difference between speaking on behalf of the Company and speaking about the Company's brands and products. This distinction is important. WD-40 Company is a global marketing organization and we have a dedicated team of employees and authorized third parties who are tasked with educating customers and end users about our brands and products globally. These brand-related marketing activities are not covered under the scope of the Company's Corporate Disclosure Policy.

The only authorized spokespersons for WD-40 Company are the CEO, CFO, and Vice President of Stakeholder and Investor Engagement. The CEO may designate other employees to speak on the Company's behalf. To prevent the inadvertent disclosure of material, nonpublic information, only designated Company spokespersons may communicate WD-40 Company matters with the news media (traditional or social), investment community (analysts, portfolio managers and stockholders), or industry analysts. In the event a member of the media, member of the investment community, or industry analyst contacts an employee, you must contact the Stakeholder and Investor Engagement department. Employees who are designated subject matter experts may participate in media interviews only with advance permission from the Vice President of Stakeholder and Investor Engagement and solely within their areas of expertise. This requirement applies to all forms of media engagement, including any pre-interviews, defined as preliminary or background discussions with members of the media that occur prior to a formal interview and may be used to shape, scope, or determine participation in a subsequent interview.
All inbound investment or media requests or inquiries received by an individual employee must be promptly referred to the Stakeholder and Investor Engagement department. No response—formal or informal—may be provided prior to such referral and approval.

In the event you receive an inquiry from outside the Company, you should:

- Be friendly and courteous.
- Not share any information about WD-40 Company or its products.
- Refer the inquiry to the office of Stakeholder and Investor Engagement: [Internal Use Only]

Associated Policy:

- *Corporate Disclosure Policy*

Social Media

Communication through social networks, blogs, wikis, or other user-generated content can reach millions of people in seconds. Social media is an excellent vehicle for communicating our knowledge and passion for our Company and its brands. However, the boundaries between personal and professional can be blurry online, and all employees play a role in shaping the digital footprint of the Company. Employees identified as WD-40 Company employees in their

personal social media accounts must ensure their content aligns with the Company's values and act in accordance with our Global Social Media Policy at all times. When we engage in social media we must do so responsibly and in accordance with the following guidelines:

- Employees should not speak on behalf of the Company without express written authorization from the Company to do so.
- Whenever posting about the Company, its brands, or its products, employees should always be transparent and disclose that they work for the Company by using the hashtag #iworkforwd40. In the event you choose to use WD-40 Company copyrighted information in your personal social media posts, please ensure you are using accurate copyright information for WD-40 Company's brands (Ex: WD-40® Brand, WD-40® Multi-Use Product, WD-40 Specialist®.)
- When posting content, employees should use sound judgment and common sense and always adhere to the Company's values.
- Employees may not post trade secrets, proprietary, material nonpublic, or confidential Company information to the internet.
- Employees should treat the Company, its employees, customers, vendors, competitors, and other stakeholders with respect.
- Employees should never post, re-post, or endorse (i.e., "share" "retweet" "like") content that promotes unsafe or inappropriate uses of WD-40 Company's brands or products. Please consult with your local marketing team if you are unsure about approved uses for Company products.
- When posting content, it is critical that employees adhere to the laws governing copyright and fair use of copyrighted material owned by others, including the Company and its brands.
- If an employee posts about the Company and/or its brands or its products on a personal blog or social media site, or something that could reasonably be viewed by others to be speaking on behalf of the Company, the employee must state that any views expressed are solely their own. This disclosure is not required when re-posting statements, or posts made by the Company or its spokesperson.
- Because we are publicly traded, employees are prohibited from participating in stock-related message boards and/or chat rooms (example: Reddit) relating to the Company and its stock. In the event you identify an error or other issue within these environments, please do not issue public comments; notify Investor Relations at [Internal Use Only].

Associated Policy:

- *Global Social Media Policy*

Global Quality

As an established leader in the consumer products industry, WD-40 Company is committed to its customers. The quality objective is to live our values. Every product we market implies a promise: consumers can trust the quality of our brands.

Each one of us has a responsibility to fulfill that promise. We must take every step to ensure the effectiveness and proper use of our products and to contribute to the communities in which we serve.

Environmental and Social Responsibility

WD-40 Company has long been committed to purpose-driven growth. We are committed to operating our business in a manner which ensures a balance between economic growth, environmental impact, and social well-being which will help create and protect long-term stakeholder value. The Company is committed to conducting its operations in an environmentally responsible manner and in compliance with applicable federal, state, and local laws, including those related to environmental impact reporting, marketing, and advertising.

As part of its Environmental, Social, and Governance program, the Company has established environmental goals and carbon reduction targets and is currently integrating them into its strategic and tactical business activities across the Company. WD-40 Company will always consider the safety of its end users as its primary goal in developing or sourcing products. Our scientists follow product developmental mandatories that outline standard procedures to establish health, safety, and compliance profiles for all existing and new products.

We respect and acknowledge internationally recognized human rights principles. Within our Company and throughout our supply chain, we are committed to treating people with dignity and respect. The Company is committed to conducting its business in a manner that respects and promotes the fundamental rights and dignity of all people, in compliance with applicable legal requirements.

Associated Policies and Disclosures:

- *Animal Testing Policy*
- *Anti-Corruption Compliance Policy*
- *Chemical and Product Safety Policy*
- *Chemical Safety Data Sheets*
- *Consumer Product Safety Improvement Act*
- *Corporate Governance Guidelines*
- *Distributor and Supplier Code of Conduct*
- *Environmental Sustainability Policy*
- *Freedom of Association Statement*
- *Non-Discrimination Statement*
- *Responsible Sourcing Policy*
- *Conflict Minerals Policy Statement*
- *Slavery and Human Trafficking Policy*
- *Whistleblower and Reporting Policy*
- *Environmental, Social and Governance (ESG) Report*

Legal and Regulatory Compliance

WD-40 Company, like any other commercial enterprise, must conduct its business in compliance with numerous laws and regulations. Employees are expected to contribute to the efforts of the Company to remain compliant in the following ways:

- Maintain awareness of laws and regulations that apply to our location and areas of responsibility.
- Consider whether a law or regulation may impact our decision-making.
- Direct questions or concerns to the General Counsel's office.

Examples of the areas of business that are subject to laws and regulations include: employment practices; privacy and data security; production, storage and handling of products; advertising, labeling, and packaging; environmental and safety; product pricing and agreements with competitors (antitrust laws); intellectual property rights; contracting; financial reporting; anti-corruption and anti-bribery; anti-slavery; and conflict minerals.

Associated Policies and Disclosures:

- *Anti-Corruption Compliance Policy*
- *Fair Competition Policy*
- *Conflict of Interest Policy*
- *Conflict Minerals Policy Statement*

- *Corporate Disclosure Policy*
- *Distributor and Supplier Code of Conduct*
- *Export Control and Trade Sanctions Policy*
- *Gift, Hospitality, and Charitable Donations Policy*
- *Insider Trading Policy and Guidelines*
- *IP Ownership Policy*
- *Reporting and Whistleblower Policy*
- *Slavery and Human Trafficking Policy*

Tax Law Compliance

Tax evasion is a serious offense with serious criminal consequences to those who facilitate tax evasion by any person, including the Company, employees, customers, distributors, and suppliers. The U.K. has adopted the Criminal Finances Act 2017, including the Corporate Criminal Offences, which requires that the Company adopt appropriate procedures to prevent the facilitation of tax evasion by persons other than the Company. In addition to adhering to our values and high ethical standards as they relate to the Company's tax law compliance, employees can support the Company's efforts to prevent the facilitation of tax evasion by considering business transactions and relationships that increase the risk of tax evasion by bringing such transactions or relationships to the attention of the Company's Ethics & Compliance Committee and ensuring the Company discharges its obligations in respect of payment of all taxes, levies, duties, rates, contributions, imposts, and similar charges.

The following transactions and relationships are some examples of areas of particular risk for the facilitation of tax evasion:

- Proposal to make payments "under the table."
- Invoices that don't match payments made to the vendor.
- Purchase orders or invoices for suspicious goods or services.
- Side payments made to persons other than a vendor or customer.
- Payments made by or to a company in one jurisdiction for goods or services delivered to or received from a different jurisdiction.
- Multiple names for organizations or individuals on contracts, payments, orders and invoices relating to the same goods or services.

Appropriate disciplinary action, as described below in this Code of Conduct, will be applied to any employee who is found to have engaged in any conduct that knowingly facilitates or attempts to facilitate tax evasion by the Company or by any other employee, or any Company distributor, customer, or supplier.

Compliance Training

At WD-40 Company, we promote and foster a culture of the highest ethical standards, internal controls, and compliance with laws and regulations. This is achieved by ensuring that all part-time and full-time employees are complying with our Code of Conduct and ethical standards. Compliance is everyone's responsibility. Management in each region is responsible for educating, training, and motivating all employees (both full- and part-time) to understand and comply with our Code of Conduct, our ethical standards, and all applicable laws. These trainings and communications help employees understand how the Company manages ethics and compliance matters, implements corporate-wide training programs, and provides information on ethics and compliance oversight and accountability.

WD-40 Company is committed to upholding our values through our business relationships with our manufacturers, suppliers, and other contract parties. We obtain commitments from our business partners to carry out their obligations to us in a responsible manner according to the terms of WD-40 Company Distributor and Supplier Code of Conduct. Our marketing distributor business partners participate in annual online training and provide annual compliance certification.

Associated Policy:

- *Distributor and Supplier Code of Conduct*

Achieving More Together

Growing and Protecting the Company



Our Company is committed to providing a healthy, safe, and productive work environment. To ensure each employee is protected and can perform to the best of their abilities, we must follow established policies and procedures, and we should all identify and report unsafe conditions, inappropriate behavior, and the violation of any law, regulation, or Company policy.

Freedom of Association

WD-40 Company recognizes the rights of our employees to freely associate and openly communicate regarding their working conditions, including the rights of employees to belong to trade unions and engage in collective bargaining. The Company also informs its employees of the Company's support for these rights as part of our periodic updates and communications related to our Code of Conduct and regional employee handbook. The Company is committed to a purpose-driven and value-guided workplace. In the jurisdictions where we do business, we respect and comply with all relevant laws and strive to be an employer of choice and upstanding corporate citizen under all circumstances.

Associated Disclosure:

- *Freedom of Association Statement*

Safety, Substance Abuse, and Violence in the Workplace

The Company is committed to providing a safe and healthy workplace for our employees and to observe all applicable laws and regulations in all jurisdictions where our employees reside and work. No employee is required to work at a job that they know is not safe. We all share the responsibility to make health and safety a daily priority. Each of us is accountable for observing the local health and safety rules and practices that apply to our job and for taking precautions necessary to protect ourselves, our colleagues, and our visitors. Laws, regulations, and reporting requirements relating to employee and public safety affect nearly all facets of the Company business.

Similarly, WD-40 Company intends to provide a safe working environment for all employees. The Company views the use and presence of illegal substances and the abuse of other substances as extreme hazards to employees, visitors, customers, and the community.

With respect to the consumption of alcohol, the Company is committed to maintaining a workplace that is safe, enables employees to perform to the best of their ability, and furthers the purpose of our corporate values. Employees should limit their consumption of alcohol while at business functions, hosting business guests, or in the course of occasional entertainment of customers or vendors. Alcohol expensed as part of a business meal should be limited and moderate. Employees are expected to know their tolerance limits, act with moderation, and ensure that their consumption does not violate applicable Company policies and laws. While recognizing the diverse legal, cultural, and social norms across the global regions in which we operate, the consumption of alcohol on work premises, during working hours, and at business meetings or events shall only be allowed in accordance with the Company's applicable local or regional guidelines. Please consult with your local Human Resource department for further information.

Further, WD-40 Company is committed to providing a workplace that is free of violence. Acts or threats of physical violence, including intimidation, harassment, and/or coercion, which involve or affect the Company, or which occur on WD-40 Company's property, will not be tolerated.

Associated Policies:

- *Responsible Consumption of Alcohol Policy*

Discrimination and Harassment-Free Workplace

At WD-40 Company, we want everyone to experience a sense of belonging, which means being included and feeling accepted and valued. Our culture of inclusion and belonging is strengthened when our behaviors and norms are guided by our values, which includes doing the right thing. We all benefit from an environment that values diversity and acknowledges contributions from employees with varying individual characteristics that make us unique. A diverse group of people and ideas in the workplace is essential to our business success.

Likewise, we are committed to maintaining a fair, consistent, and inclusive work environment free of unlawful harassment and discrimination. We believe that every employee deserves to be acknowledged for their uniqueness and treated with dignity, enabling us to grow and succeed together. We comply with all local laws and regulations regarding unlawful discrimination. Employees are expected to make all employment decisions based on legitimate, non-discriminatory business reasons in accordance with applicable laws and regulations. Employees shall not tolerate or engage in any discrimination, harassment, and unfair treatment based on race, ethnicity, ancestry, caste, national origin, religion, age, disability, gender, gender identity, marital status, sexual orientation, veteran status,

union membership, political opinion, HIV/AIDS status, citizenship status, or any other characteristic that might give rise to discrimination.

Various forms of harassment and discrimination are prohibited by law. Behavior that interferes with another's work environment or otherwise creates an offensive, intimidating, disruptive, abusive, or hostile work environment is also prohibited.

It is important for employees who witness or feel they have been unlawfully harassed or discriminated against to immediately report the incident to leadership and/or Human Resources. However, if you are not comfortable reporting through those individuals, you may contact the Company's independent, anonymous and secure third-party whistleblower service provider at: https://wd40.integrityline.com. Alternatively, you can call the toll-free number for your relevant country listed on the landing page of the above website address or as set out in Appendix A to this Code of Conduct.

Employee and Data Privacy

WD-40 Company respects the privacy of every employee, customer, and or other third party with whom we engage. As such we collect and retain personal information only in accordance with applicable local data privacy laws. It is every employee's responsibility to be familiar with local Company policies relating to data privacy, and computer and electronic device use.

Associated Policies:

- *Global Workforce Privacy Notice*
- *Global Electronics & Telecommunications Policy*

Responsible Use of Artificial Intelligence and Emerging Technologies

WD-40 Company embraces innovation while ensuring that artificial intelligence (AI), automation, and data tools are used ethically and responsibly. All employees must:

- Use AI and digital tools in ways that align with our values, security and governance standards, and applicable laws and regulations, including local, state, regional and country-level requirements.
- Protect privacy, our intellectual property and confidential information and avoid bias, discrimination, or misuse of data.
- Maintain human oversight of critical decisions supported by AI.
- Use only approved technologies and follow cybersecurity and data protection policies.
- Report concerns about inappropriate or unethical use of AI or emerging technologies.

The AI landscape, including both the technology itself and its regulation by local, regional and country-level legislative and regulatory bodies, is—and will continue to be—constantly evolving. WD-40 Company recognizes the need to remain both flexible and prepared for potential regulatory actions and new legislation related to AI.

When in doubt, ask your coach or contact IT team or Legal and Compliance team. Technology should always serve people and support our commitment to doing the right thing.

Associated Policies:

- *Acceptable Use Policy for AI with Safe Usage Guidelines*

Upholding Our Values

Enforcement and Reporting



Global Ethics and Compliance Committee

WD-40 Company has established a Global Ethics and Compliance Committee to ensure the Company maintains an effective and robust ethics and anti-corruption program for its global operations. The Committee is presently comprised of the following persons:

[Internal Use Only]

The Committee is subject to the direction of the CEO and reports directly to the Board of Directors and the Audit Committee of the Board. It is the Committee's responsibility to seek to ensure compliance with this Code of Conduct, the Company's Anti-Corruption Policy and other Company policies relating to compliance and ethical conduct. The Committee is also informed and consulted on the investigation of any alleged violation of this Code of Conduct reported to the Committee.

The Company has also designated Regional Compliance Officers to provide guidance to employees in dealing with ethical and compliance-related matters referred to in this Code of Conduct. A list of Regional Compliance Officers is included as Appendix B to this Code of Conduct. Questions regarding our legal and ethics compliance program can also be addressed to the Global Ethics and Compliance Committee at [Internal Use Only]. If you have a legal and ethics violation to report, please see "Reporting Concerns" section below.

Reporting Concerns

The ethical principles guiding us in ethical decision-making also direct us to seek guidance if we have questions or concerns. They also guide us to report any conduct considered to be a violation of the law, this Code of Conduct or any Company policy. If we remain alert to possible violations or questionable decision-making, we will protect each other from greater harm than if we delay or otherwise decide we should not act.

Ultimately, it is both our right and our responsibility to promptly report unethical or illegal conduct or violations of this Code of Conduct. We want to know immediately if there are any concerns, questions, or reasonable grounds to suspect Company activities that would be considered, but not limited to, any of the following:

- Misconduct, or an improper state of affairs or circumstances;
- Conduct that constitutes a violation of applicable law;
- Conduct that constitutes a violation of Company policies;
- Conduct that represents a danger to the public or the financial system;
- Questionable accounting, internal accounting controls or auditing matters; or
- Any conduct described above, even if it is no longer ongoing.

Here are some examples of corrupt, illegal, or other undesirable conduct that should be reported immediately:

- Illegal conduct, such as discrimination, harassment, theft, violence or threatened violence, and criminal damage against property;
- Fraud, money laundering, or misappropriation of funds;
- Offering or accepting a bribe;
- Financial irregularities;
- Failure to comply with, or breach of, contractual, legal, or regulatory requirements; or
- Engaging in or threatening to engage in detrimental conduct against a person who has made a disclosure or is believed or suspected to have made or be planning to make a disclosure.

The best approach for handling any suspicion or concern you may have regarding conduct that may constitute a violation of law, this Code of Conduct or Company policy is to bring the matter to the attention of your coach, Human Resources, a Regional Compliance Officer, a member of the Global Ethics and Compliance Committee or our Global Legal and Compliance team. However, if you are not comfortable reporting through those persons, you may use the Company's Employee Reporting Hotline, which allows reporters to confidentially and, to the extent permitted by law, anonymously report an issue involving violation of the law, this Code of Conduct or any Company policy. It is available at: https://wd40.integrityline.com. The Reporting Hotline is available 24/7 and in local languages.

Alternatively, you can call the toll-free number for your relevant country listed on the "call us" tab of the above website address, or as set out in Appendix A to this Code of Conduct.

Reports to the Reporting Hotline are received in confidence and are forwarded to appropriate independent personnel to investigate, and the outcome of the investigation will be reported to the Global Ethics and Compliance Committee.

Associated Policy:

- *Reporting and Whistleblower Policy*

Retaliation

It is very important to understand that the attributes of integrity, fairness, and trust supporting our Company values also lead us to protect any employee who, in good faith, reports any actual or suspected violation of law, this Code of Conduct, or Company policy. The Company is committed to protecting employees who report violations of law, this Code of Conduct, or Company policy in good faith from reprisals or retaliation. Retaliation in any form is strictly prohibited and any retaliatory conduct will result in disciplinary action, up to and including termination of employment.

Specifically, neither the Company nor any officer, director, employee, contractor, subcontractor, or agent of the Company will discharge, demote, suspend, threaten, harass or in any manner discriminate against any employee with regard to employment (a) based upon any lawful action of that employee of the type contemplated by this Code of Conduct, Section 806 or Section 1107 of the Sarbanes-Oxley Act of 2002 or Section 922(a) or Section 748 of the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010, (b) because the employee has provided information to, or assisted in an investigation by (i) supervisory personnel of the Company, (ii) any federal regulatory or law enforcement agency or (iii) any member or committee of the Congress, regarding the activities the employee reasonably believes are a violation of federal fraud laws or any rule or regulation of the SEC, (c) because the employee filed, testified, participated in or otherwise assisted in a proceeding that has been filed or is about to be filed relating to alleged fraudulent activities or violations of SEC rules and regulations, or (d) as otherwise envisaged under local law whistleblowing regimes.

If an employee or other person believes that they have been subject to retaliation because they have taken any of the actions referenced above, or an employee or other person is aware that any such retaliation may have been made against any other employee, the employee or other person should report such conduct to the persons designated to receive a report under these procedures or to a member of the Company's Human Resources department.

Associated Policy:

- *Reporting and Whistleblower Policy*

Investigations

All reported violations or suspected violations will be investigated promptly and fairly. Employees must provide full cooperation in any investigation. All communications regarding the investigation should be maintained in confidence to assure the integrity and fairness of the investigation. However, nothing in this Code of Conduct or any other policy or agreement is intended to limit or discourage the reporting of concerns to law enforcement agencies. All reports will be received in confidence and the Company will use appropriate efforts to preserve such confidentiality to the extent consistent with the Company's best interests.

In the event of a government investigation or inquiry relating to possible misconduct or other compliance-related matters, Company employees should consult with the General Counsel. Employees who are required to respond to a government inquiry must provide accurate, complete, and honest responses.

Associated Policy:

- *Reporting and Whistleblower Policy*

Disciplinary Action

Where a violation of this Code of Conduct or any Company policy is found to have occurred, the Company will consider appropriate disciplinary action based on the severity of the violation, the culpability of the individual and other factors considered relevant under the circumstances. Consistent with country-specific regulations and policies, applicable discipline can range from compensation adjustments, demotion, or change of responsibilities, up to possible termination of employment. Violations may also result in civil and/or criminal liability.

Waivers

Any request for a waiver of the application of this Code of Conduct to any action or relationship must be presented to the General Counsel for consideration by the Global Ethics and Compliance Committee. Waivers will be considered and may be granted only where the best interests of the Company can be adequately protected and only where application of the Code of Conduct will otherwise result in particular hardship and/or where there is no viable alternative to the action or relationship.

Any waiver of this Code of Conduct for an executive officer or a member of the Board of Directors must be approved by the Board of Directors. Certain waivers and the reasons for such waiver will be disclosed in a current Securities and Exchange Commission report (on Form 8-K) promptly following the issuance of such waiver.

Appendix A: Reporting Hotline

WD-40 Company Code of Conduct

Reporting of Questionable Practices

We expect everyone who works for the Company to comply with our Code of Conduct, our policies and procedures, professional standards, and applicable laws and regulations. Each of us has a responsibility to speak up when we suspect something does not look or feel right, using one of the many channels available within the Company. Suspected violations of the law, this Code of Conduct or any Company policy, should be reported promptly to your coach, another leader, a Regional Compliance Officer, or directly to a member of the Global Ethics and Compliance Committee. If you are concerned about maintaining confidentiality and anonymity, you may contact the Reporting Hotline through the internet or by phone using the information below.

It is against WD-40 Company policy to retaliate against any employee, officer, or director for good faith reporting of violations of the WD-40 Company Code of Conduct.

WD-40 Company will promptly investigate any reported violations.

Internet Access

https://wd40.integrityline.com/

Phone Access

Country	Carrier	Number	Translated Greeting
Note: For countries not listed here, use the following number. Operator assistance may be required, and charges may apply.	*All Carriers*	*+1 720 514 4400*	*English, Spanish, Mandarin, Arabic, Russian, French, Armenian, Bengali, Lao, Uzbek*
Albania (Tirana)	All Carriers	4 454 1957	Albanian, English, Greek
Algeria	All Carriers	982402369	French
Angola (Luanda)	All Carriers	226434276	Portuguese, English
Antigua	All Carriers	1-855-385-4107	English
Argentina	All Carriers	0800-333-0095	Spanish
Australia	All Carriers	1 800 763 983	English
Austria	All Carriers	0800 281119	German, English
Bahamas	All Carriers	1-855-271-0889	English

Bahrain	All Carriers	800 06 488	Arabic, English
Bangladesh	All Carriers	(0) 9610 998400	Bengali, Hindi, English
Barbados	All Carriers	1-855-203-6928	English
Belarus	All Carriers	8 820 0011 0404	Russian, English
Belgium	All Carriers	0800 260 39	Dutch, French
Belize	All Carriers	1 800 017 6274	English
Benin (Parakou)	All Carriers	61012482	French, English
Bermuda	All Carriers	1-855-579-9534	English
Bolivia	All Carriers	800 104 008	Spanish, English, Portuguese
Bosnia & Herzegovina	All Carriers	080-083-038	Bosnian, English
Botswana	All Carriers	00269 800 3002 116	English
Brazil	All Carriers	0 800 892 2299	Portuguese
Brazil (Rio de Janeiro)	All Carriers	21 2018-1111	Portuguese
Brunei	All Carriers	801 4144	Malay, English
Bulgaria	All Carriers	0800 46038	Bulgarian, English, Turkish
Burkina Faso	All Carriers	25300026	French, Mossi
Cambodia (Phnom Penh)	All Carriers	23962515	Khmer, English, French
Canada	All Carriers	1-800-235-6302	French, English
Cayman Islands	All Carriers	1-855-475-9296	English
Chile	All Carriers	800-914-012	Spanish
China	All Carriers	400 120 3062	Mandarin
Colombia	All Carriers	01-800-5189703	Spanish

Colombia (Bogota)	All Carriers	13816523	Spanish
Costa Rica	All Carriers	4000-3876	Spanish
Croatia	All Carriers	0800 806 520	Croatian, English
Curacao	All Carriers	9 7889979	English, Dutch, Spanish
Cyprus	All Carriers	8009 4544	Greek, Turkish, English
Czech Republic	All Carriers	800 701 383	Czech
Denmark	All Carriers	8082 0058	Danish
Dominican Republic	All Carriers	1-829-200-1123	Spanish
Ecuador	CNT, Claro and Movistar	1 800 000 138	Spanish, English
Egypt	All Carriers	0800 000 0413	Arabic
El Salvador (San Salvador)	All Carriers	2113-3417	Spanish, English
Estonia	All Carriers	800 0100 431	Estonian, Russian, English
Ethiopia	All Carriers	800-86-1917	Oromo, Amharic, English
Finland	All Carriers	0800 07 635	Finnish
France	All Carriers	0805 080339	French
Georgia	All Carriers	706 777493	Georgian
Germany	All Carriers	0800 181 2396	German
Ghana	All Carriers	24 2426201	English, Akan
Greece	OTE	00800 1809 202 5606	Greek
Greece (Athens)	All Carriers	21-1198-2708	Greek
Grenada	All Carriers	1-855-304-7847	English
Guatemala (Guatemala City)	All Carriers	2378-4832	Spanish

Honduras	Hondutel (fixed), Tigo (mobile)	800-2791-9500	Spanish, English
Hong Kong	All Carriers	800 906 069	Mandarin, Cantonese, English
Hungary	All Carriers	212111440	Hungarian
Iceland	All Carriers	800-4256	Icelandic, English
India	VSNL	000 800 100 3428	Hindi, English, Telugu
India	All Carriers	000 800 100 4175	Hindi, English, Telugu
India (Kolkata)	All Carriers	337-1279005	Hindi, English, Telugu
Indonesia	All Carriers	0800 1503216	Indonesian
Ireland	All Carriers	1800 904 177	English
Israel	All Carriers	1 809 477254	Arabic, Hebrew
Israel (Jerusalem)	All Carriers	2-375-2169	Arabic, Hebrew
Italy	All Carriers	800 727 406	Italian
Ivory Coast	All Carriers	566770939	French, English
Jamaica	All Carriers	1-876-633-1693	English
Japan	All Carriers	0800-170-5621	Japanese
Jordan	All Carriers	0800 22656	Arabic, English
Kazakhstan	All Carriers	8 800 333 3511	Kazakh
Kenya	All Carriers	0800 221312	English, Swahili
Kenya (Nairobi)	All Carriers	20 3892291	English, Kirundi, Amharic, French
Korea, Republic of (South Korea)	All Carriers	080 880 0476	Korean, English
Kosovo – Pristina	All Carriers	38-403-005	Serbian, German, English
Kuwait	All Carriers	227-9501	Arabic, English, Hindi, Nepalese

Kyrgyzstan	All Carriers	00 800 13337 289	Russian
Laos (via Singapore)	All Carriers	+65 3158-9628	English, Mandarin
Latvia	All Carriers	8000 4721	Latvian, Russian
Lebanon *Number is 2-step	All Carriers	01 426 801 then 855-8659-450	French, English
Lithuania	All Carriers	8 800 30451	Lithuanian, Russian, English
Luxembourg	All Carriers	800-27-311	French
Macau	All Carriers	6825-8516	Portuguese
Macedonia	All Carriers	0800 93894	Macedonian, Albanian, Turkish
Malawi	All Carriers	800 026 9819	English, Chichewa
Malaysia	All Carriers	1548770383	Malaysian
Mali	All Carriers	449 60005	French, Bambara
Malta	All Carriers	800 62781	Maltese, English, Italian
Mauritius	All Carriers	802 049 0005	English
Mexico	All Carriers	800 681 6945	Spanish, English
Moldova	All Carriers	0800 69006	Romanian, Russian, English
Montenegro (Podgorica)	All Carriers	20405815	Montenegrin, English
Morocco (Casablanca)	All Carriers	5204 85014	Arabic, English
Myanmar (Yangon)	All Carriers	1 239 0053	Burmese, English
Namibia (Windhoek)	All Carriers	833300079	English
Nepal	All Carriers	1 800 001 0106	Nepali, English
Netherlands	All Carriers	0-800-022-0441	Dutch
New Zealand	All Carriers	0800-002-341	English

Nicaragua	Claro	001 800 222 5602	Spanish
Nicaragua (Managua)	Claro and Movistar	2248-2265	Spanish
Nigeria	All Carriers	070 80601844	English
Norway	All Carriers	800 62 492	Norwegian, Swedish, English
Oman	All Carriers	800 74295	Arabic, English
Pakistan (Islamabad)	All Carriers	51 8108900	English, Urdu, Farsi
Panama	All Carriers	800 2066	Spanish
Papua New Guinea	Landlines only	861204	English
Paraguay	All Carriers	009 800 542 0162	Spanish
Peru	All Carriers	0800 78323	Spanish, English
Philippines (Manila)	All Carriers	2 86263049	Tagalog, English
Poland	Polish Telecom	00-800-111-3819	Polish
Poland	All Carriers	00-800-141-0213	Polish
Portugal	All Carriers	800 180 367	Portuguese
Qatar	All Carriers	00800 100 801	Arabic, English
Republic of Congo	All Carriers	64000036	English
Romania	All Carriers	0-800-360-228	Romanian, English
Russia	All Carriers	8-800-100-9615	Russian
Saudi Arabia	STC Network phones ONLY	800 814 0282	English, Arabic
Saudi Arabia	Etihad Atheeb, Mobiliy and Zain networks, not STC Network	800 850 0510	English, Arabic
Serbia	All Carriers	0 800 190 167	Serbian, German, English

Singapore	All Carriers	800-852-3912	English, Mandarin
Slovakia	All Carriers	0 800 002 487	Slovak, Czech, English
Slovenia	All Carriers	0 804 88853	Slovenian, English
South Africa	All Carriers	080 098 3612	English
Spain	All Carriers	900 905460	Spanish
Sri Lanka	All Carriers	247 2494	English
St. Lucia	All Carriers	1-844-236-5175	English
Sudan	Zain, MTN, Sudani-Sudatel	15 655 9802	Arabic, English, Tigrinya
Sweden	All Carriers	020 889 823	Swedish
Switzerland	All Carriers	0800 838 835	French, German, Italian, English
Taiwan	All Carriers	00801 14 7064	Mandarin
Tajikistan (Dushanbe)	All Carriers	427 815395	Russian
Tanzania	All Carriers	0800 780 005	Swahili, English
Thailand	All Carriers	1 800 012 657	English, Thai, Burmese
Thailand (Bangkok)	All Carriers	2106 5161	English, Thai, Burmese
Trinidad and Tobago	All Carriers	1-868-224-5814	English
Tunisia	All Carriers	31399185	Arabic, French, English
Turkey	All Carriers	850 390 2109	Turkish
Uganda	All Carriers	206300115	English, Swahili
Ukraine	All Carriers	0 800 501134	Ukrainian
United Arab Emirates	All Carriers	8000 3570 3169	English, Arabic
United Kingdom (includes England,	All Carriers	0 808 189 1053	English

Scotland, Northern Ireland, Wales)			
United States (includes US Virgin Islands, Puerto Rico, Guam)	All Carriers	1-800-461-9330	English, Spanish
Uruguay	All Carriers	000 401 912 22	Spanish, English, Portuguese
Uzbekistan	All Carriers	00 800 120 1246	Uzbek, Russian, English
Venezuela	All Carriers	0800 102 9423	Spanish
Venezuela (Caracas)	All Carriers	212 720 2174	Spanish
Vietnam	Viettel	122 80 390	Vietnamese
Vietnam (Ho Chi Minh)	All Carriers	2844581407	Vietnamese
Zimbabwe	All Carriers	86 4404 1046	English

Appendix B: Regional Compliance Officers

WD-40 Company Code of Conduct

[Internal Use Only]