REPORTING AND WHISTLEBLOWER POLICY

To submit an anonymous report, please visit:
https://wd40.integrityline.com/

1. Introduction

1.1. As members of the WD-40 Company organization, we each have ethical and legal responsibilities to uphold. This Reporting and Whistleblower Policy ("Reporting Policy"), part of the Company's Code of Conduct, is intended to help us understand how to report unethical or illegal conduct. We are committed to making business decisions ethically, legally, responsibly, and in accordance with our values.

1.2. The success of our Company is based on Fairness, Trustworthiness, and Responsibility. 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 potential violations or questionable decision-making, we will protect one another from greater harm than if we delay or otherwise decide not to take action.

1.3. This Reporting Policy is an important element in detecting and preventing corrupt, illegal or other undesirable conduct. We strongly encourage you to speak up if you suspect or witness any matters of concern.

1.4. Through this Reporting Policy, we require directors, officers, and employees to observe high standards of business and personal ethics in the conduct of their duties and fulfillment of their responsibilities.

1.5. We will take all reports made under this Reporting Policy seriously. This Reporting Policy describes the protections available to Reporting Persons (as defined below), what matters are reportable, how you can report your concerns, and how the Company will support and protect you.

2. Reporting: Doing the Right Thing

Reporting potential misconduct helps ensure we are practicing our values.

2.1. We expect everyone who works for WD-40 Company and its subsidiaries 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 WD-40 Company.

2.2. We examine every report thoroughly and follow up on each systematically. A key pillar of the whistleblower system is the principle of procedural fairness. We also guarantee the greatest possible protection for Reporting Persons, persons implicated, and employees contributing to the investigation of reported misconduct.

2.3. Retaliation against Reporting Persons and any employees who contribute to promoting correct behavior at WD-40 Company and its subsidiary organizations will not be tolerated. Additionally, persons implicated in a report are presumed innocent until the violation is proven. Investigations will be conducted with the utmost confidentiality. The information will be processed in a fair, fast and protected process.

3. Reporting Person: Who May Make a Report?

3.1. A Reporting Person is a natural person who may be a current or former partner, director, officer, company secretary, employee, supplier of goods or services to WD-40 Company or its subsidiaries (such as a secondee, contractor, and consultant), intern, or volunteer.

3.2. Reporting Person status may also apply to relatives, dependents, or spouses of any of the above listed people.

4. Reportable Conduct: What Should Be Reported?

4.1. Reportable conduct is anything that you have reasonable grounds to suspect, in relation to WD-40 Company or its subsidiaries, 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; or
- → Any conduct described above, even if it is no longer ongoing.

4.2. Examples of Reportable Conduct concerning WD-40 Company and its subsidiaries include, but are not limited to the following:

- → 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.

4.3. Reportable Conduct is limited to activity occurring in a work-related context.

4.4. Before making a report, you should satisfy yourself that you have reasonable grounds to suspect reportable conduct.

4.4.1. Reasonable grounds to suspect is based on objective reasonableness of the reasons for the suspicion. In practice, a mere allegation with no supporting information is unlikely to reach that standard.

4.4.2. However, a Reporting Person does not need to prove their allegations. In addition, the disclosure can still qualify for protection even if the disclosure turns out to be incorrect.

4.5. Anyone filing a complaint concerning a violation or suspected violation must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation. Any allegations that prove to have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offense.

5. Reporting Conduct: How do You Make a Report?

5.1. Internal reporting channels

5.1.1. To make an internal report, you may take any of the following steps:

→ Contact WD-40 Company's independent, anonymous and secure whistleblower service, which is available 24 hours a day at the following address:

https://wd40.integrityline.com/

→ Call the dedicated hotline available 24/7 in all languages of countries where the Company operates;

→ The U.S. number is 1-800-461-9330; and

→ The numbers for all other countries can be found on the landing page of the reporting website at the address listed above.

Reports may be made through fellow employees or anonymously, through our reporting service.

5.1.2. The best approach for handling any suspicion or concern you may have regarding Reportable Conduct is to bring the matter to the attention of your coach, another leader, a Regional Compliance Officer, a member of the Global Legal and Compliance team, or directly to a member of the Global Ethics and Compliance Committee. However, if you are not comfortable reporting through those persons, recall that the confidential (and anonymous, to the extent permitted by law) reporting service described in Section 5.1.1 above will be available to you at all times.

5.2. What should you include in your report?

5.2.1. Please provide as much detailed information as possible so that your report can be investigated. Some useful details include the following:

→ Date, time and location;

→ Names of person(s) involved, roles and their business group;

→ Your relationship with the person(s) involved;

→ The general nature of your concern;

→ How you became aware of the issue;

→ Possible witnesses; and

→ Any other details that support the facts you are reporting.

6. Review and Investigation: How WD-40 Company Looks into Reported Conduct

6.1. How will a report be reviewed?

6.1.1. All Reported Conduct will be reviewed and considered by the Global Legal and Compliance team, who must appoint an independent person to investigate the Whistleblower Report. An independent person is any individual who is not named in the Reported Conduct and may be an internal WD-40 Company personnel or third-party service provider. The Global Legal and Compliance team will acknowledge the receipt of Reporting Person information within 7 business days.

6.1.2. All Reported Conduct will be taken seriously by WD-40 Company. WD-40 Company will reply to all good faith Reported Conduct described in the report, and will carefully determine whether an investigation is required. The Global Legal and Compliance team will review the outcome and determine, in consultation with the investigation team and external adviser, as needed, appropriate actions to respond to the matter. The outcomes of the investigation will be reported to the Global Ethics and Compliance Committee.

6.2. How will Reported Conduct be investigated?

6.2.1. While the particular circumstances of each Reported Conduct may require different investigation steps, all investigations should do all of the following:

→ Follow a fair process;

→ Be conducted as quickly and efficiently as the circumstances permit;

→ Determine whether there is sufficient evidence to substantiate the matters reported; and

→ Be independent of the person(s) concerned with the allegations.

6.2.2. The Company will provide the Reporting Person with feedback, as appropriate, on the progress and expected timeframes of the investigation, within 90 days.

6.2.3. The Company will notify the Reporting Person once an investigation has been completed, but please be aware that it may be unable to disclose particular details or the outcome of the investigation.

7. Reporting Person Protections

7.1. Identity protection

7.1.1. Violations or suspected violations may be submitted on a confidential basis by a Reporting Person. The Reporting Person may choose to make their disclosure anonymously and if so, they will still be protected as far as WD-40 Company is able to do so under the law.

7.1.2. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

7.1.3. Where a Reporting Person makes a disclosure and identifies themselves, their identity (or any information which could identify them) will only be shared where:

→ The Reporting Person provides consent; or

→ WD-40 Company or its subsidiary is required by law to disclose the identity.

7.2. Protection from Retaliation

7.2.1. WD-40 Company is committed to encouraging Reporting Persons to speak up, and to prevent retaliation when doing so.

Individuals who report suspected wrongdoing in good faith are entitled to protection against retaliation in accordance with the provisions of this policy.

7.2.2. It is very important to understand that the attributes of integrity, fairness, and trust supporting our Company values also lead us to protect any member of the Company who, in good faith, reports any actual or suspected violation of law, the Code of Conduct or Company policy. The Company is committed to protecting those who report violations of law, the 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.

7.2.3. Retaliation is defined as a direct or indirect adverse administrative decision and/or action that is threatened, recommended or taken against an individual who has

reported in good faith suspected wrongdoing that could create a risk to WD-40 Company, its subsidiaries or an employee.

7.2.4. WD-40 Company strictly prohibits any form of retaliatory action against employees who raise issues or ask questions, make reports, participate in an investigation, refuse to participate in suspected improper or wrongful activity, or exercise workplace rights protected by law.

7.2.5. Retaliation constitutes misconduct and is subject to disciplinary action, up to and including terminating the employment or engagement of anyone shown to have caused or threatened detriment to you because you made or plan to make a report.

No one may retaliate (or threaten to do so) because they think you made, or plan to make, a report.

7.2.6. Retaliation will be found to have happened unless the suspected person can demonstrate by clear and convincing evidence that the act which is suspected to be retaliatory would have occurred even if the Reporting Person had not reported a suspicion of wrongdoing.

7.2.7. Reporting Persons who believe that they are being subjected to retaliation can report directly to Global Legal and Compliance personnel through the means detailed in Section 5.1 above.

7.2.8. In cases where a Reporting Person feels retaliated against, they should report the suspected retaliatory act as soon as possible. The report should be factual and contain as much specific and verifiable information as possible to allow WD-40 Company to conduct its investigation.

7.2.9. Where WD-40 Company considers that additional workplace harm could occur while suspected retaliation is under investigation, WD-40 Company may recommend during the investigation that local management take appropriate interim measures to safeguard the interests of the Reporting Person.

7.2.10. These measures include, but are not limited to, temporary reassignment, transfer to another office or function for which the Reporting Person is qualified, or placement on special leave with full pay, or other appropriate measures on a case-by case basis with the consent of the Reporting Person.

7.3. Data protection

7.3.1. All whistleblowing is undertaken on a voluntary basis. WD-40 Company collects the following personal data and information when you submit a notification:

- Your name, if you disclose your identity;
- Your contact details, if you provide them to us;

- The fact that you have made a notification through the Reporting Policy;
- Whether you are employed by WD-40 Company or its subsidiaries; and
- As appropriate, the names of persons and other personal data of the persons mentioned in the notification.

7.3.2. The data submitted to the reporting channel is encrypted and stored with multi-level password protection, so that access is limited to a very narrow circle of expressly authorized persons.

7.3.3. According to European data protection law, you and the persons named in the Whistleblower Report have the right to information, correction, deletion, restriction of processing and in certain cases the right to data transmission.

7.3.4. In addition, for reasons arising from your particular situation, you may object to the processing of your personal data, except when such data processing takes place in the public interest or on the basis of a balance of interests. The objection may be made informally and should, if possible, be addressed to the contacts listed in the Company's data protection notice. If the right to object is claimed, we will immediately check to what extent the stored data, in particular for the processing of a Whistleblower Report, are still necessary.

7.3.5. Data that is no longer needed will be deleted immediately. You may also revoke your consent at any time.

8. Information about the Reporting Policy

8.1. Employees may seek confidential information on the operation of this Reporting Policy and how a disclosure will be handled, without making a disclosure, by contacting WD-40 Company's Legal and Compliance personnel at [Internal Use Only].

8.2. However, if you require legal advice with respect to your obligations under this Reporting Policy or the applicable whistleblowing laws, then you must contact your own external lawyer (not WD-40 Company's in-house legal team).

8.3. The Reporting Policy will be periodically reviewed by the Global Legal and Compliance team. The Global Legal and Compliance team will provide oversight of the Reporting Policy and WD-40 Company will organize regular training for employees to know their rights and obligations regarding the reporting of unethical and illegal conduct and to explain to them how to use internal and external reporting channels.

ACKNOWLEDGMENT OF RECEIPT AND REVIEW

I, _____ (employee name), acknowledge that on _____ (date), I received a copy of WD-40 Company Reporting and Whistleblowing Policy (the "**Reporting Policy**"), dated [_____], and that I read it, understood it, and agree to comply with it.

I understand that WD-40 Company has the maximum discretion permitted by law to interpret, administer, change, modify, or delete this Policy at any time with or without notice.

I understand that if I make any report in good faith, I am fully protected against any prejudicial treatment or retaliation.

I understand that WD-40 Company will not take any action against me for raising it, irrespective of whether or not it is later substantiated.

This Reporting Policy is not promissory and does not set terms or conditions of employment or create an employment contract.

_____

Signature

_____

Printed Name

_____

Date

Definitions

Code of Conduct	WD-40 Company Code of Conduct as managed by the Global Ethics & Compliance Committee and approved by the Board of Directors on October 12, 2021.
Facilitators	A natural person who assists a reporting person in the reporting process in a work-related context, and whose assistance should be confidential.
Reported Conduct	Any orally or by writing communicated information, including reasonable suspicions, about actual or potential breaches, which occurred or are very likely to occur in WD-40 Company.
Reporting Person	A natural person who reports or publicly discloses information on breaches acquired in the context of his or her work-related activities.
Reporting Policy	The part of WD-40 Company's Code of Conduct that defines the applicable rules in terms of reporting and sets out the protection of Whistleblowers.
Whistleblower Report	The document related to the Reported Conduct and proving that the reporting was done.