

CODE OF CONDUCT



KNOW WHAT'S RIGHT.
DO WHAT'S RIGHT.

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DEAR KIMBERLY-CLARK EMPLOYEES,

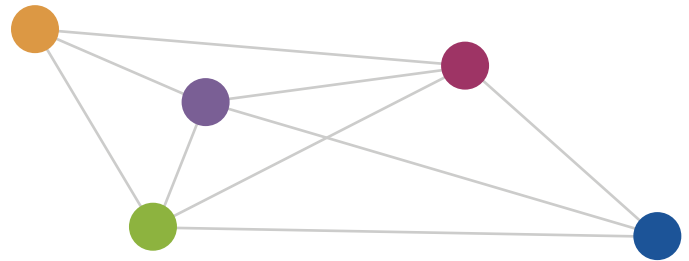
For years, Kimberly-Clark has been recognized as a company who does the right thing. In the last several years we've received numerous awards for our ethical management practices including having been honored as one of the "World's Most Ethical Companies," as determined by [Ethisphere](#). I am very proud that our Kimberly-Clark employees take pride in our reputation. One of our core values is being "Authentic" which, at Kimberly-Clark, means that we will continue our heritage of honesty, integrity, and courageously doing the right thing. That's what we've always done and it is the standard we hold ourselves accountable to in the future.

A reputation is a valuable asset. In the plugged-in and wired world we work in today, a company's actions – and the actions of its employees – are under more scrutiny than any time in history. Expecting every Kimberly-Clark employee, everywhere and every day, to live up to the standards of our Code of Conduct in everything that we do is a big challenge. But that is what I expect because that's the kind of company we all want to work for.

Please take the time to read and understand our Kimberly-Clark Code of Conduct. Ask questions about it. Follow it. Expect your co-workers to do the same. If we all do this, we will continue to be stewards of a 140+ year tradition at Kimberly-Clark.



Sincerely,
Thomas J. Falk
Chairman of the Board and
Chief Executive Officer



As Tom mentions in his letter, our reputation as a company and as individuals is a valuable asset. In my role as General Counsel, it is my responsibility to work with you to protect that reputation. Making sure that you understand what is required of you by the laws of the jurisdictions in which we operate is only part of what Kimberly-Clark expects of us as employees. In many situations, Kimberly-Clark expects more than the law requires.

The Kimberly-Clark Code of Conduct is a valuable guide to ethical issues that may arise from time to time in your contacts with fellow employees, customers, suppliers, competitors and the general public. Take time to read the Code and think about how it applies to you and to your work. Make sure that you understand your responsibilities under the Code, including the responsibility to report suspected violations and to cooperate in Company investigations.

If you have questions or concerns, the Code identifies the resources that are available to you for answers. If you feel the need to talk through a situation in order to arrive at an appropriate solution, talk to your team leader, your Human Resources specialist, or anyone in the Legal Department. You may also contact the Code of Conduct Line if you wish to remain anonymous. In addition, you may contact me directly, at any time, with questions or concerns regarding compliance with the Code of Conduct and the Company's standards for integrity and ethics. It's our reputation, let's all work together to protect it.



Sincerely,
Thomas J. Mielke
General Counsel



WHY WE HAVE A CODE OF CONDUCT

At Kimberly-Clark, we provide the essentials for a better life. Our One K-C values are the principles and ideals that have made us who we are today and define the kind of company we want to be in the future. We are:

Authentic – At Kimberly-Clark, we believe in continuing our heritage of honesty, integrity and courageously doing the right thing. We strive to be one of the world's most successful companies, dedicated to winning through hard work and fair play.

Accountable – We take ownership for our business and our future. We establish ambitious goals for our businesses and ourselves and then stretch to exceed them. We feel personally responsible for achieving both our individual and team potential.

Innovative – Our founders established a culture that encouraged entrepreneurial spirit, experimentation in product development and creativity in marketing. We continue to be committed to new ideas that add value for our customers and partners. We recognize that today's best is the benchmark we must surpass tomorrow.

Caring – All this, plus truly respecting each other and caring for the communities where we live and work, makes Kimberly-Clark a company people want to work for and do business with around the world.

We believe that the way we do our business is as important as the business that we do. Operating with integrity and high ethical standards is the Kimberly-Clark way of doing business. The Code

of Conduct reinforces our values by providing guidance for dealing with customers, suppliers, other employees, competitors, and the public with integrity and in an ethical and appropriate manner. Living these values and demonstrating our One K-C Behaviors of Build Trust, Make Decisions, Win Consistently, Think Customer, Continuously Improve, and Build Talent are essential to our success.

The Code cannot describe all laws, regulations, or Kimberly-Clark policies that apply to us or to a specific situation. Instead, the Code creates a framework of ethical standards within which all employees must operate. Those standards are often higher than the minimum legal obligations. The Code is an important reference guide for us as we strive to conduct our businesses in an ethical and appropriate manner.

In a rapidly changing world, where innovation is key to winning in the marketplace, we want our teams to be taking smart risks to win. At the same time, we are committed to our values, our One K-C Behaviors, and doing the right thing. The Code provides the direction our employees need.

As an employee of Kimberly-Clark, reading and understanding the Code of Conduct is an important first step in getting to know our history, our culture, and our expectations. Nothing is more fundamental to your success at Kimberly-Clark than understanding and demonstrating the ethical standards explained in our Code.



THE CODE APPLIES TO ALL OF US

Each of us has the obligation to read and understand the Code of Conduct. The Code of Conduct applies to every Kimberly-Clark employee around the world. The Code of Conduct also applies to members of the Board of Directors of Kimberly-Clark Corporation. The Code does not and is not intended to interfere with or limit any rights employees may have under local laws.

If a local custom, culture, or law sets a different standard than the Code, you should ask the Legal Department for guidance.

We are each responsible for our own compliance with the Code, to report suspected violations, and to cooperate in the Company's investigation of potential violations.

SHARE YOUR CONCERNS WITHOUT FEAR

If you become aware of a Code of Conduct issue, there are many reasons that you may not want to tell anyone. You might not be sure it happened. You might be afraid to “cause trouble” or that someone will “get back” at you. You might think it is someone else’s responsibility.

But doing the right thing means speaking up. If you do not feel comfortable using your name, you can share your concern anonymously. Employees who come forward with concerns play an important role in maintaining our ethical workplace. You have a responsibility to share information so that the Company can respond quickly and take appropriate action. One of the most important ways you can make a difference is by being aware of any unethical or illegal workplace activity and promptly reporting it.

NO-RETALIATION POLICY

Our Company is committed to protecting the rights of those individuals who report Code of Conduct issues in good faith in accordance with the [No-Retaliation Policy](#). Our Company will not retaliate against a person who:

- Reports what he or she believes is a violation of our Code, our policies, or the law.
- Raises a compliance question or seeks advice about a particular business practice, decision, or action.
- Cooperates in an investigation of a potential violation.

You cannot lose your job or your benefits, or be demoted, suspended, threatened, harassed, or discriminated against, for raising a Code of Conduct concern honestly or for truthfully participating in a Company investigation. Those involved in the investigation of any violation are also protected by this no-retaliation policy.

Any employee who retaliates will be disciplined up to and including termination.

REPORTING HONESTLY

Reporting honestly means that you have a good faith belief that the Code of Conduct has been violated, even if an actual violation cannot be verified. Filing a report to retaliate against another individual, gain an advantage in a personal conflict, or to harass or intimidate does not constitute reporting honestly. Dishonest reporting under the Code of Conduct is in itself a violation of the Code of Conduct. If you believe someone is retaliating against you, please report it as you would a violation of the Code.

Q. Different countries have different culture and laws. **Does the Code apply to everyone globally?**

A. Yes. The conduct established in the Code applies to all employees worldwide regardless of the location. If a local custom, culture, or law sets a different standard than the Code, you should ask the Legal Department for guidance.

Q. I saw my team leader doing something that seemed unethical, but I'm afraid to report the suspected violation. **Will I get in trouble or hurt their reputation by making a report?**

A. No. You cannot get in trouble or hurt your team leader’s reputation simply by making a report. You will not be held responsible for reports made honestly, even if they turn out to be unfounded. Investigations are conducted in an objective, fair, and confidential way to ensure that employees’ reputations are protected. All concerns about the Code and reports of retaliation will be fully investigated.



RESOURCES FOR ASKING QUESTIONS OR REPORTING CONCERNS

Reporting suspected violations of the Code of Conduct is critical so that the Company can properly determine if a problem exists that needs to be fixed. For that reason, we all have an obligation to report suspected violations of the Code of Conduct. Raise all concerns to the appropriate level and function in accordance with the [Protocol for Reporting and Escalation of Code of Conduct Issues](#). If you have questions about the Code or you are aware of suspected violations, there are several resources available to you.

Your Team Leader:

You may take your questions and concerns to your team leader. If you do not want to tell your team leader about your concern, or if you do not believe your team leader has taken appropriate action, you can also go to:

Another Team Leader:

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

The K–C HelpLine:

Email: KCHelpLine@kcc.com

Web: www.KCHelpLine.com

Call: 1.844.KCHELP1 1.844.524.3571 (U.S.)

For non–U.S. numbers visit: KCHelpLine.com

Mail: Global Ethics & Compliance Office
Kimberly–Clark Corporation
351 Phelps Drive
Irving, TX 75038 United States

Q. I have a concern, but it is not covered by the Code of Conduct. **Does that mean there is no problem?**

A. **The Code of Conduct cannot possibly answer every question or ethical situation.** If something does not seem right to you, ask your team leader or one of the other people listed in this Resources section.

OBLIGATIONS OF TEAM LEADERS AND OTHERS RECEIVING REPORTS OF POTENTIAL CODE VIOLATIONS

Team leaders and others who receive reports of potential Code violations play a very important role in upholding the Code of Conduct. Kimberly-Clark encourages team members to talk to their team leaders about their concerns. Team leaders and others who receive reports of potential Code violations need to be prepared and know how to handle any Code of Conduct concerns or reports. Team leaders should:

- Make sure you know and understand the Code, and model your behavior consistent with the Code.
- Act to stop violations of the Code or the law by team members.
- Let team members know that you are available to discuss their concerns.
- Take team members' questions and concerns seriously.

Once a potential Code of Conduct violation is reported to you:

- Feel free to seek guidance before responding.
- Raise all concerns to the appropriate level and function in accordance with the [Protocol for Reporting and Escalation of Code of Conduct Issues](#).
- Support team members who raise concerns honestly and treat them with respect.
- Never let team members feel that their concerns are being ignored.
- Ensure that no retaliation occurs against someone for reporting a suspected violation of the Code.

VIOLATIONS OF THE CODE

Violations of the Code of Conduct are serious offenses. Violating the Code, our policies or the law may result in disciplinary action up to and including termination. It all depends on the facts of each case including the type of violation and how severe it is.

All disciplinary actions are reviewed to ensure that violations are handled consistently. Where the violations of the Code are also a violation of law you may be subject to fines, penalties, criminal prosecutions, or other legal remedies imposed by a governmental agency or a court.



CONDUCT WITH OUR TEAM

Kimberly-Clark believes that our success depends on trust and respect for each other. Teamwork is a value that guides us in all we do.



FREEDOM OF ASSOCIATION

We are committed to respecting our employees' right to freedom of association, including:

- The right to organize in accordance with national laws and practices.
- The right to collective bargaining through representatives of their own choosing.
- The right of their chosen representatives to have reasonable access to our employees in order to represent them.
- The right to engage in other protected activities.
- The right to refrain from such activities.

For further information, read the following:

[Human Rights in Employment Policy](#); [Human Rights in Employment Policy Instructions](#)

DIVERSITY AND INCLUSION AND NON-DISCRIMINATION

We are committed to having a globally diverse workforce through equal employment opportunity. We will:

- Recruit, promote, and support the professional development of a globally diverse workforce.
- Hire, train, promote, and compensate based on the ability, achievement, experience, and conduct of the employee without regard to race, ethnicity, color, gender, sexual orientation, age, religion, creed, national origin, gender identity, disability, legally protected leave or veteran status, or other categories protected by applicable law.
- Recognize and utilize the diversity of each other's talents, abilities, and experiences.
- Be open to all perspectives and help others feel comfortable expressing those perspectives.

For further information, read the following:

[Employee Resource Group Guidelines](#); [Diversity Toolkit](#); [Diversity & Inclusion Homepage](#); [Human Rights in Employment Policy](#); [Human Rights in Employment Policy Instructions](#); [Human Resources Development and Diversity Policy](#); [Company Position Statement on Harassment and Other Inappropriate Behaviors](#)

GLOBAL HUMAN RIGHTS

Kimberly-Clark is committed to recognizing human rights on a global basis. We have established certain standards designed to protect human rights and also expect our suppliers and business partners to follow these standards:

- Allow freedom of association and collective bargaining.
- Protect against child labor.
- Protect against forced labor and abuse of labor.
- Prohibit discrimination.
- Comply with work hour, wage, and benefit laws.
- Provide a safe and healthy workplace.
- Protect the environment.
- Prohibit corruption and bribery.

For further information, read the following:

[Social Compliance; Human Rights in Employment Policy;](#)
[Human Rights in Employment Policy Instructions;](#)
[Human Resources Development and Diversity Policy;](#)
[Company Position Statement on Harassment and Other Inappropriate Behaviors](#)



Q. I overheard my team leader tell my co-worker a joke involving religion that made my co-worker uncomfortable. I don't want to get in the middle of anything. **What should I do?**

A. Report it. All employees are entitled to a workplace where their co-workers and team leaders treat them with dignity and respect. You should report the matter to your Human Resource representative or use the Code of Conduct Line, even though doing so may make you uncomfortable. [Resources for Asking Questions or Reporting Concerns](#)

Q. I feel as though I was not given a promotion because of my gender. **What should I do?**

A. Report it. Kimberly-Clark policy requires that employment decisions be made without regard to the gender of the candidate. If you feel you were treated unfairly, you should report your concern. [Resources for Asking Questions or Reporting Concerns](#)

CONDUCT TIP

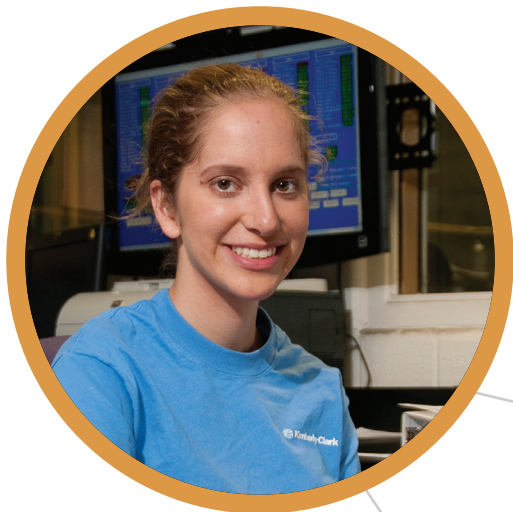
If you see or become aware of a supplier or vendor violating any of these human rights standards, report it.

WORKPLACE SAFETY

At Kimberly-Clark, we believe that occupational injuries and illnesses are preventable and can be eliminated. No production goal, cost saving, time saving or competitive advantage is worth an injury of any kind. We are committed to:

- Ensuring that safety is core to our fundamental “Caring” value.
- Integrating our belief that all workplace injuries and illnesses are preventable into our research and engineering, product development, manufacturing, delivery, and sales activities.
- Providing a workplace that meets or exceeds applicable occupational safety and hygiene laws and regulations.
- Establishing occupational safety and hygiene standards and technical guidance based on best practices.
- Striving to continually improve our occupational safety and hygiene performance.
- Expecting all Kimberly-Clark personnel to contribute to safety improvements.

For further information, read the following:
[Global Occupational Safety and Hygiene \(GOSH\)](#)



CONDUCT TIP

Remember these three basic commitments to workplace safety in your daily activities:

1. “Look after yourself”

I will refuse to take any action I consider unsafe or to perform any task I am not properly trained to do or do not have the proper tools to do.

2. “Look after your co-workers”

I will immediately confront anyone performing, or about to perform an act or task I consider to be unsafe and I will prevent anyone from performing a task which they are not properly trained to do.

3. “Listen to your co-workers”

I will immediately stop what I am doing if someone confronts me about a task I am doing. I will resolve the concern with respect and goodwill, requesting assistance from another if necessary, before continuing.

Q. My team leader suggested using an unsafe practice to speed up the production line. I know our goals are very important, but I don't feel that the new process is safe.

What should I do?

A. **Report it.** Never compromise safety. No production goal, cost saving, time saving, or competitive advantage is worth an injury of any kind. Every employee has the right to refuse to do work reasonably perceived to be dangerous to personal health or safety. [Resources for Asking Questions or Reporting Concerns](#)

RESPECTFUL WORKPLACE

We are committed to providing our employees with a work environment free from harassment, intimidation, and other inappropriate behavior.

Examples of harassment can include:

- Unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature.
- Offensive talk, jokes, pictures, and comments that involve race, color, sex, sexual orientation, gender identity, age, religion, creed, national origin, disability, veteran status, or other protected categories.

Examples of inappropriate behavior can include:

- Shouting or screaming in anger.
- Calling names.
- Profanity directed at another person.
- Threats and intimidation.
- Public teasing/ridicule.
- Intentionally excluding a person from a group.

For further information, read the following:

[Human Rights in Employment Policy](#);
[Human Rights in Employment Policy Instructions](#);
[Company Position Statement on Harassment and Other Inappropriate Behaviors](#)

WORKPLACE VIOLENCE

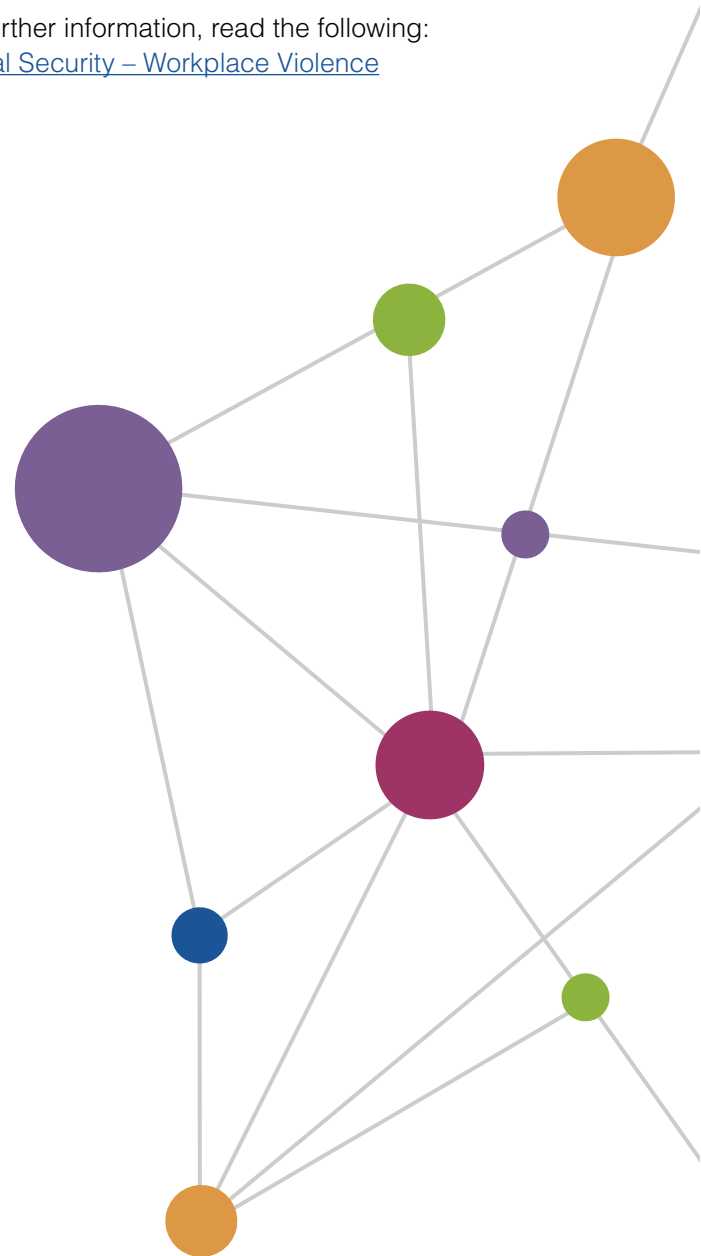
We are committed to a violence-free workplace.
We should each:

- Report any act, whether physical or psychological, which threatens or harms an employee in a violent or potentially violent manner.
- Not possess or use a weapon while on Company premises or at Company functions.

Any reported situation which contains even the slightest possibility for workplace violence, even if meant as a joke, will be investigated by Human Resources and Global Security.

For further information, read the following:

[Global Security – Workplace Violence](#)



DRUGS AND ALCOHOL

We are committed to a drug-free workplace.

- Do not manufacture, possess, sell, use or be under the influence of alcohol, non-prescribed drugs, narcotics or any other “controlled substance” as defined by applicable laws while at work, except for the lawful use of legally-obtained prescription drugs to the extent such use does not impair job performance, or alcoholic beverages served and consumed in connection with an authorized event.
- Participate in Kimberly-Clark awareness programs to educate yourself about the hazards of substance abuse and addiction.
- Contact the local Kimberly-Clark confidential Employee Assistance Program if drug or alcohol abuse may be affecting your job performance or the performance of others.
- All employees are subject to testing, if allowed by local law, if the employee appears to be under the influence of drugs or alcohol at work, or when the Company has reason to believe an employee has violated this policy. All applicants must pass a post-offer, pre-employment drug screening.

For further information, read the following:

[Alcohol, Drugs and Other Controlled Substances Policy;](#)
[Alcohol, Drugs and Other Controlled Substances Policy Instructions](#)

Q. I am a team leader. Several of my team members and I had dinner with a vendor rep. One of my team members had too much alcohol and made several flirtatious remarks to the vendor rep and another co-worker. I thought this was a personal issue and didn't say anything.

Am I right?

A. No. If you tolerate your team member's inappropriate behavior, you are giving the message that it is acceptable. All employees must treat co-workers and business associates with respect regardless of the setting. Consumption of alcohol in excess in the workplace (i.e. on Company premises, at Company worksites, while on Company business, and/or while at Company functions) or in the presence of co-workers and business associates is never acceptable. You should counsel the team member on appropriate behavior.

Q. I overheard a co-worker threaten another employee, who is afraid to report the incident.

What should I do?

A. Report the incident immediately. Kimberly-Clark will not tolerate acts or threats of violence and will investigate all reports. You have a responsibility to act when you know of a threat or risk to any of our people. [Resources for Asking Questions or Reporting Concerns](#)

CONDUCT WITH OTHERS

OUR BUSINESS

Fair dealing has been a fundamental value of Kimberly-Clark since the Company was founded. We believe that honesty and trustworthiness build long-lasting relationships. There are many ways we stay true to this value in today's environment.

CUSTOMERS AND SUPPLIERS

We are committed to fair dealing with our customers and suppliers.

- Do not mislead, misrepresent, deceive, or take unfair advantage of customers or suppliers.
- If you know of a mistake, whether it is in Kimberly-Clark's favor or not, correct it.
- Follow Kimberly-Clark sourcing processes with Procurement before engaging suppliers.
- Buy from suppliers and sell to customers based on appropriate business considerations such as quality, price, service, reliability, and commitment to sustainability and human rights.
- When buying goods or services on behalf of the Company, treat all potential suppliers fairly and honestly.
- Do not offer, give, solicit or receive any form of bribe or kickback.
- Do not offer or give gifts, entertainment, or favors for the purpose of obtaining an improper business advantage with a customer. (See [Gifts, Entertainment and Other Favors](#) in this Code.)
- Suppliers to Kimberly-Clark are required to comply with all applicable local and national laws, rules, regulations and requirements in the manufacturing and distribution of our products and supplies and in the provision of services. All Kimberly-Clark contracts and purchase orders must require suppliers to adhere to the Supplier Social Compliance Standards (SSCS).

For further information, read the following:

[Kimberly-Clark Purchasing Manual](#);
[Supplier Social Compliance Standards](#)

CONSUMERS

You should never compromise product quality or safety.

- Kimberly-Clark's reputation for product safety and quality is one of our most valuable assets. We are committed to providing products that are safe and please our customers.
- Consumer's health, safety, and well-being are our primary concern. We will meet or exceed legal and regulatory requirements and industry standards for product safety and quality. We work every day to earn the trust of our consumers through all our actions and decisions.
- We are committed to producing safe, high-quality products across all our brands. We maintain consumer trust by designing and manufacturing superior products, starting with the purchase of raw ingredients and continuing until the finished product is used by the consumer.
- Each one of us plays a role in providing our consumers with the safe, high-quality products they expect. Know the quality standards, policies, and procedures that apply to the products and activities at your location.
- Never do anything that could undermine the trust our consumers place in us, or could compromise the quality or safety of our products.
- If you see, hear or become aware of something that could negatively affect or has negatively affected the quality or safety of a Kimberly-Clark product, speak up and report it immediately to your team leader or your facility, business unit, or corporate quality/product safety department.

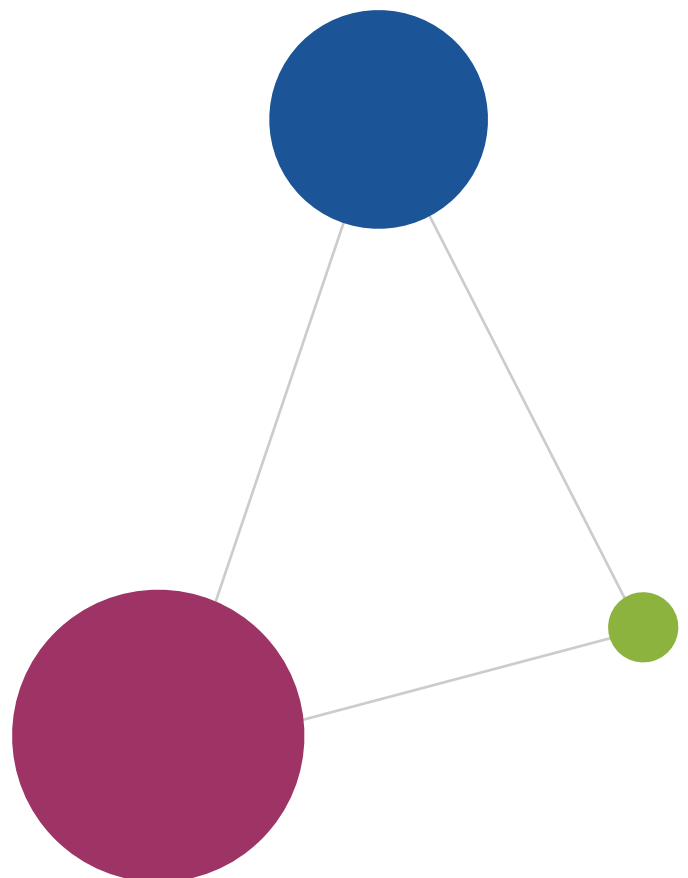
For further information, read the following:

[Quality of the Corporation's Products and Services Policy](#); [Quality of the Corporation's Products and Services Policy Instruction](#); [Safety of the Company's Products and Services Policy](#); [Safety of the Corporation's Products and Services Policy Instruction](#); [Quality Management System](#)

Q. We received a raw material on our production line. The material just did not look like the material I am used to working with; I think it might be contaminated. My team leader said that we are in a rush to make this order and that I should not be concerned and just use it.

What should I do?

A. **Stop and report it.** Never do anything that you believe could compromise the quality or safety of our products. No production goal or time saving measure is worth compromising the trust our consumers place in us. Stop what you are doing and contact your facility quality leader to determine whether the material is safe and meets our quality specifications. [Resources for Asking Questions or Reporting Concerns](#)



CONSUMER AND EMPLOYEE DATA PRIVACY

As part of our everyday work, many of us have access to personally identifiable information of our employees, suppliers, business partners, and the consumers of our products. Accordingly, we are committed to handling their personally identifiable information in compliance with Kimberly-Clark Corporate Policy and Policy Instructions on Data Privacy, contractual obligations, and applicable privacy and data protection laws and regulations.

We maintain administrative, technical, and physical safeguards designed to protect this information. We use these safeguards to protect against accidental, unlawful, or unauthorized destruction, loss, alteration, access, disclosure or use of this information. Failure to meet our obligations could result in government actions, damage to our reputation, potential lawsuits, fines and penalties.

It is important that we understand our obligations and exercise proper care and judgment to fulfill our obligations concerning handling of this information. In addition, Kimberly-Clark employees who interact with third parties that may be acting on our behalf are responsible for managing these relationships to ensure that Kimberly-Clark maintains data privacy.

For further information, read the following:
[Data Privacy Policy](#); [Data Privacy Policy Instruction](#);
[Data Privacy Standards - Employee](#); [Data Privacy Standards - Consumer](#)

SOCIAL MEDIA

Social media outlets (e.g. Facebook, Twitter, LinkedIn, Weibo) are an important method of personal and business communications. We must, however, use care and consideration in posting or sharing anything online.

- There should be no expectation of privacy if you participate in social media while at work or while using Kimberly-Clark equipment.
- Only authorized employees may use social media on behalf of Kimberly-Clark. If you are not so authorized, you should identify when making posts that you are an employee of Kimberly-Clark and make it clear that any opinions expressed are your own and not those of Kimberly-Clark.
- Be careful never to disclose Kimberly-Clark's confidential or proprietary information, including trade secrets, intellectual property, and copyrighted or trademarked information, when using social media (or otherwise).
- Never disclose photos or any other personal information on behalf of Kimberly-Clark without first obtaining permission.
- Be courteous, respectful, and use good judgment in what you say online. Never post anything that is defamatory, discriminatory, harassing, or retaliatory.

If you have any questions about posting anything online, you can contact your team leader, the Human Resources, or Legal Departments for assistance. For further information, read the following:
[Kimberly-Clark Social Media Guidelines](#)

COMPETITION

We are committed to fair competition in compliance with antitrust laws (also called competition laws) in every country, state, and locality where we do business. We compete vigorously and ethically by making independent decisions on how to compete. We always treat customers fairly and never undermine free competition in the marketplace.

Penalties for violations of antitrust laws can be severe and include damage to reputation, high fines, and jail. More and more, countries share information to enforce these types of laws – so an investigation in one country can quickly expand to many countries.

In general:

- Never discuss topics with competitors that could affect pricing or marketing decisions such as prices, sales terms, business plans, margins, costs, bids, production capacity, inventory levels, trade promotions, or discounts.
 - Never agree with competitors to fix prices, limit production or sales, or divide territories, customers, or suppliers.
 - Never allow retailers, distributors or customers to coordinate pricing in the marketplace or place the Company in a position where it could be considered to be acting as a conduit for such conduct. For example, never forward pricing information from one retailer to another or consider one retailer's suggestions in making pricing recommendations to another retailer.
 - In those instances where we have significant market power we must not abuse that power by monopolizing, tying (selling a product only if the buyer buys a second product), improperly price discriminating between competing reseller customers, pricing below our cost, or refusal to supply.
- Do not require our customers to sell our products at the prices we set. We can suggest a resale price, but we cannot coerce any customer to use it.
 - Do not agree with other companies to boycott suppliers or customers.
 - Contact the Legal Department for specific guidance about the laws in your country and report all inappropriate conversations with competitors.

Q. While talking to a friend who used to work at Kimberly-Clark, I learned she now works for a competitor. She asked me about upcoming product introductions and promotional pricing, and offered to share her company's marketing and pricing plan with me. **It is okay for me to have this conversation with her?**

A. No. You should end the conversation and contact the Legal Department immediately. You should always exercise caution if you find yourself in a meeting with a competitor because it can give the appearance of impropriety. If you do find yourself in such a meeting you should never talk about business topics like those you mention as that conversation may lead to an improper agreement, or the appearance of an improper agreement, on pricing. If pricing is raised leave the room immediately and contact the Legal Department.

COMPETITIVE INFORMATION

In the ordinary course of business, information is routinely acquired about other companies, including customers, suppliers, and competitors. Being exposed to this type of competitive information is an ordinary part of a competitive business environment. However, there are legal and ethical limits on acquiring competitive information:

- Never use, obtain, accept or receive any information to which Kimberly-Clark is not clearly and legitimately entitled.
- We should not seek to acquire information through improper means, such as through bribery or covert surveillance of our competitors.
- We should not hire an employee of a competitor to get confidential information or encourage employees of competitors to disclose confidential information about their employer.
- If offered information about a competitor that you believe may be confidential, you should ask if it is confidential and how it was obtained. If similar information about Kimberly-Clark is confidential, then you should assume that the competitive information is also confidential and treat it accordingly. If you are uncertain about whether the information was obtained properly, contact the Legal Department.
- If the material that is offered is written material and carries a classification such as “secret,” “confidential,” or “proprietary” or if you otherwise determine that it is confidential, you should refuse to accept it. Immediately make a note of what occurred and then contact the Legal Department.

For further information, read the following:

[Conflicts of Interest, Gifts and Disclosure of Confidential Information](#); [Conflicts of Interest, Gifts and Disclosure of Confidential Information Instruction](#); [Global Information Technology Standards](#); [K-C Competitive Information Center](#); [Confidentiality-Nonsolicitation Agreement](#); [Records Administration Policy](#); [Access Control](#); [Proprietary Information](#)

Q. I heard about a meeting that a competitor is holding at a trade show that I will be attending. I don't think they will allow me to attend if they know that I'm from Kimberly-Clark. **Can I go if I pose as a customer?**

A. No. Obtaining information about a competitor by disguising your identity is never appropriate. Gathering information about competitors is a legitimate business activity when done lawfully and ethically. You should also consult with the Legal Department before meeting with a competitor, because any such interactions may raise antitrust concerns.

Q. To help me do a better job at Kimberly-Clark, I kept several documents that I used at my previous employer describing various processes they used. **Can I use them at Kimberly-Clark?**

A. It depends. If the documents contain confidential or proprietary information, you cannot use or share this with Kimberly-Clark. Kimberly-Clark expects all employees to honor confidentiality or nondisclosure agreements or other obligations of confidentiality to their previous employer. If you are unsure, check with your previous employer and if you are still unsure, talk to the Legal Department before accepting, using, or sharing suspect information.

ENVIRONMENT

Kimberly-Clark is committed to operate its business in a way that protects the environment and promotes the sustainable use of natural resources. We should each:

- Know and comply with applicable laws and regulations.
- Know and comply with all Kimberly-Clark policies including the Protection of the Environment, Waste Minimization and Landfill Elimination, and Energy Efficiency and Greenhouse Gas Reduction and standards adopted as part of the corporate Environment, Health and Safety Management System.
- Support the sustainable use of natural resources including water conservation, the reduction and beneficial reuse or recycling of waste, and energy conservation. We regularly assess performance in these areas and develop action plans to ensure compliance with environmental requirements and to mitigate our use of natural resources.

All employees are expected to act as responsible citizens and environmental stewards by adhering to laws, regulations, and standards concerning the environment.

For further information, read the following: [Protection of Environment Policy](#); [Protection of Biosphere Instruction](#); [Waste Minimization and Landfill Elimination Policy](#); [Energy Efficiency and Greenhouse Gas Reduction Policy](#); [Fiber Procurement Policy](#); [Fiber Procurement Policy Instruction](#); [Global Sustainability SharePoint Site](#)

GOVERNMENT

As a global company, Kimberly-Clark is subject to the laws of all countries in which we operate. We are committed to complying with all applicable government laws, rules, and regulations. It is important to remember that compliance with the Code reflects the minimum standard acceptable. Where local or specific provisions are relevant and require an even higher standard of conduct, the more stringent rules may apply (e.g. when interacting with Healthcare Professionals). Additionally, many countries sometimes apply their laws to Company operations and personnel outside their borders. Always check with our Legal Department if you are not sure what laws apply to your situation.

In addition:

- Be careful to make clear that you do not speak or act for Kimberly-Clark unless you have been specifically authorized to do so.
- If you are contacted by a government official in connection with your work, or are asked to provide information in connection with a government agency inquiry or investigation, you should contact the Legal Department or a member of the Regulatory Affairs staff for advice.
- Do not contact government departments or personnel seeking to influence legislation, regulations, or decision making on behalf of Kimberly-Clark without consulting the Legal Department. Many countries have laws regulating or even prohibiting such activity. (See [Gifts, Entertainment and Other Favors](#) in this Code.)

For further information, read the following: [Public Statements with Corporate Implications Policy](#); [Public Statements with Corporate Policy Instruction](#); [Anti-Corruption Policy](#); [Anti-Corruption Policy Instruction](#)

Q. I have seen activities at Kimberly-Clark that may compromise the environment or create an environmental hazard. **What should I do?**

A. **Report it to your team leader.** If you are aware of any potential violation of law or company policies or procedures it is your responsibility to report it. The incident or condition will be investigated and, if necessary, corrected. [Resources for Asking Questions or Reporting Concerns](#)

DOING BUSINESS INTERNATIONALLY

As a global company that frequently moves people, products, technology, software, information, money, and equipment and spare parts across national borders, we are committed to abiding by all applicable laws and regulations regardless of where we are located.



If you are involved in moving people, products, technology, software, information, money, or equipment across borders:

- You must know and comply with all applicable import/export laws and regulations.
- You must not engage in any prohibited conduct.
- You must report all requests related to boycotts to the Legal Department.

Contact the Legal Department or Export Department for up-to-date guidance if you are uncertain about your obligations.

For further information, read the following:

[The Kimberly-Clark Export Controls and Economic Sanctions Manual](#); [Consumer Classification Tool](#); [Nonwoven Classification Tool](#); [Professional Classification Tool](#); [Information Technology Export Control Watchlist](#); [Kimberly-Clark Anti-Boycott Manual](#); [Supply Chain Security Programs](#)

Q. We are starting up a new e-commerce website to sell products directly to consumers. In order to efficiently manage our database of consumer information, we want to engage a service provider located in another country. **Is this a problem?**

A. **It depends.** Consult with the Legal Department. If the database containing consumer information is going to be shared with the service provider in a different country, there may be data privacy issues. Different countries/regions have different regulatory structures for ensuring that the privacy of personal information is maintained. In some countries, we could be in violation of privacy regulations by exporting consumer data from one country to another.

CONDUCT WITH OUR COMPANY

OUR INFORMATION AND COMPANY RESOURCES

Each of us has a duty to protect Company resources and to avoid conflicts of interest with the Company.

CONFLICTS OF INTEREST

When conducting Company business, we each have a duty to act in the best interest of the Company and to avoid actual, potential, or perceived conflicts of interest. A conflict of interest arises when personal interests, activities, or relationships in a transaction or matter might reasonably appear to affect the judgment you exercise on behalf of Kimberly-Clark, influence your actions or lead you to neglect Kimberly-Clark's interests. Some conflicts of interest are obvious, such as a kickback payment for awarding Kimberly-Clark business to a vendor. Other conflicts of interest may be less obvious, such as conducting business with a firm owned by a close family member, even when that firm appears to be offering the best value. Any concerns you have regarding actual, potential or perceived conflicts of interest should be discussed with your team leader and disclosed to the Legal Department. We should each:

- Avoid actions that create or even appear to create conflicts of interest with the Company.
- Never use our position at Kimberly-Clark for improper personal gain.
- If you think that you, a family member, another Kimberly-Clark employee, or a Kimberly-Clark business partner has an actual potential or perceived conflict of interest, you must disclose it to both your team leader and the Legal Department and have the relationship reviewed.

Here are some examples of actual or potential conflicts of interest that must be disclosed to the Legal Department:

Outside Employment

- You or a close relative is employed by, provides services for, or receives payment from any competitor, supplier, or customer.

- You or a close relative owns a business that does business with Kimberly-Clark.
- You have outside employment or business interests that interfere with your ability to do your job at Kimberly-Clark (e.g. by causing you to spend Kimberly-Clark time on your outside employment).
- You conduct business on the side for your personal benefit (not for Kimberly-Clark) with any Kimberly-Clark vendor, supplier, customer, or contractor.

Financial Interests

- You or a close relative has an investment or other financial interest in a privately-owned supplier, competitor, or customer of Kimberly-Clark.
- You or a family member owns more than 1% of the stock of any competitor, supplier, or customer of Kimberly-Clark.

Q. A friend of mine who is the owner of a vendor of Kimberly-Clark has asked me to invest in his company. **Can I make this investment provided that I declare my interest to Kimberly-Clark?**

A. No. Investing in a Kimberly-Clark vendor is a conflict of interest and disclosing your interest does not remove the conflict.

Q. A vendor has invited me to speak at one of its meetings. **Is that okay?**

A. It depends. Obtain your team leader's approval before speaking at any external events. Do not disclose any confidential information when presenting to outsiders. Do not accept payment of expenses if it could cause a conflict of interest, such as the vendor gaining favorable treatment from Kimberly-Clark.

Examples of actual or potential conflicts of interest continued:

Public Service

- You volunteer at a charity or other organization that is considering an issue involving Kimberly-Clark.
- You raise money for charity during working hours (except where sponsored by Kimberly-Clark).
- You ask customers or suppliers to make charitable donations (except where sponsored by Kimberly-Clark).
- You are asked by customers or suppliers to make charitable donations (except where sponsored by Kimberly-Clark).

Speeches and Presentations

- You are offered a fee for outside speeches or presentations in connection with your work for Kimberly-Clark.

Personal Relationships

- You supervise or are supervised by a close relative or partner.
- You are considering hiring a close relative or partner as an employee or contractor.

Boards

- You are considering accepting a Board appointment but you are concerned that the commitment may interfere with your job.
- You are on a Board that is considering a decision that may affect Kimberly-Clark.

Political Relationships

- You work on a political campaign during working hours.
- You are expressing political views in a setting where your audience may think you are speaking on behalf of Kimberly-Clark.
- You make contributions or payments to political parties or candidates on behalf of Kimberly-Clark.

For further information, read the following:

[Conflicts of Interest, Gifts and Disclosure of Confidential Information Policy](#); [Conflicts of Interest, Gifts and Disclosure of Confidential Information Policy Instruction](#); [Sourcing & Supply Management Manual](#)

Q. My brother is an electrical contractor and is located near one of our mills. He wants to provide services for the mill. **Is he allowed to perform services at Kimberly-Clark facilities?**

A. **It depends.** Your brother may approach Kimberly-Clark to offer his services as long as you have no responsibility for procuring these services, and you have no involvement in the selection process. His company will need to go through the established selection process and meet Kimberly-Clark criteria. You should tell your team leader about such situations.

Q. My wife owns a company which has been providing logistics services for many years to the Mill where I am the purchasing manager. I told Kimberly-Clark about this when I first joined Kimberly-Clark and was told it was not a problem. However in the last 2 years my wife's business has grown significantly and her company now provides 70% of the Mill's logistics services. **Is this still okay?**

A. **It depends.** There is a clear conflict of interest here which may be damaging to Kimberly-Clark. You should seek further guidance from the Legal Department.

CONDUCT TIP

Do not e-mail photos of Company processes, equipment, or machinery to third parties without prior permission.

CONFIDENTIAL INFORMATION

Our businesses operate in a variety of complex and competitive markets. Every employee needs to be aware that confidential information and trade secrets must be protected in the same manner that other Company assets are secured. Confidential information must be held in the strictest confidence and reasonable care should be exercised in dealing with such information in order to avoid inadvertent or improper disclosure.

We are committed to protecting confidential information including that provided to us from our suppliers or customers under obligations of confidentiality. In the course of our work, many of us have access to confidential information, including:

- Business plans, including potential acquisitions or dispositions and potential organizational restructuring.
- Pricing strategies.
- Financial information.
- Patent or trademark applications.
- Product development or research and development information.
- Employee personal, performance, career development and salary information.
- Manufacturing methods.

Do not disclose any confidential business information to anyone outside the Company, even to members of your own family, unless the disclosure is necessary to deliver a clear business objective and properly authorized, including if appropriate, subject to a written confidentiality agreement. This information must not be used in any way other than in the performance of one's employment duties. Even within the Company and among your co-workers, confidential information should only be shared on a need-to-know basis. This is particularly true with information regarding potential acquisitions or dispositions and potential restructuring or organizational changes.

Disclosing confidential information such as acquisitions, product recalls, organizational changes, relationships

with customers or vendors, financial information, personal employee information (address, phone numbers, employee numbers), or any other sensitive information to those who do not have a need to know or who may inadvertently or improperly disclose it could hurt the Company's competitive position and its shareholders. Do your part to protect confidential information:

- Be cautious discussing company business in public, such as in elevators, airplanes and restaurants, and when using mobile phones.
- Do not use your laptop computer on an airplane to work on Company matters when someone can see your screen.
- Refer any questions from investors, analysts, and the media to Corporate Communications or Investor Relations.
- Refer outside questions that seem to ask for confidential information to the Global Security Department.
- Do not allow anyone access to Company facilities without proper written authorization.
- Do not use non-public information about Kimberly-Clark to trade in stocks or securities.
- Ask the Legal Department if you have any questions about whether it is appropriate to buy or sell Company stock.

Media tools such as social networking sites, blogs, or wikis are subject to the same rules as any other communications. Do not post any information about acquisitions, product recalls, organizational changes, relationships with customers or vendors, financial information, or personal employee information (address, phone numbers, employee identification numbers, etc.) as once posted, it may become available to anyone in the world, including our competitors, even if the post is subsequently deleted. You should assume that Company information is confidential unless you are certain the Company has publicly released the information. In addition, all files, records, and reports created or acquired in the course of employment are the property of the Company.

For further information, read the following:
[Insider Trading Procedures; Public Statements with Corporate Implications Policy; Public Statements with Corporate Implications Policy Instruction; Contracts Policy; Contracts Policy Instruction; Corporate Records Administration; Records Creation, Retention and Destruction Policy; Global Security Guideline on Proprietary Information; Data Privacy Policy](#)



Q. I have a personal blog where I share my thoughts and feelings with my friends. **What should I consider before including any work related information?**

A. Be careful. Media tools such as blogs, wikis, and networking sites are subject to the same rules as any other communications. Do not disclose any confidential business information. For example, do not write about acquisitions, product recalls, organizational changes, relationships with customers or vendors, financial information, personal employee information, (address, phone numbers, employee identification numbers), or any other sensitive or confidential information.

Q. I have recently made a presentation to senior management about the potential acquisition of a company. The project team has requested that I place this presentation on a SharePoint site. **Is this okay?**

A. Be careful. Before placing confidential information on a SharePoint site it is your responsibility to make sure that access is restricted so that it can only be viewed by the project team and other authorized personnel. If you are ever able to access information on a SharePoint site that you believe should be restricted, you should immediately notify the Legal Department.

CONDUCT TIP

Be careful what you share outside of Kimberly-Clark. Sharing a colleague's name, phone number, and e-mail address without his or her permission is inappropriate. It could harm the Company, create legal problems, and could even harm your colleague. Contact the Legal Department before taking any Kimberly-Clark potentially confidential information outside of the Company.

USE OF COMPANY RESOURCES

We are committed to protecting the resources under our control. Company resources include, but are not limited to:

- Equipment, machinery, tools, and spare parts.
- Product inventory and supplies.
- Telephones, copiers, and fax machines.
- Computers, laptops, mobile phones, tablets, printers, and other technology resources.
- E-mail and internet access systems and tools.
- Confidential information and records.
- Inventions and ideas.
- Trademarks, copyrights, and patents.
- Trade secrets and plans.
- Receivables.
- Business relationships.
- Reputation.

Each of us must:

- Use Company resources responsibly to ensure that they are not misused or wasted; always respect and protect the reputation of the company.
- Manage budgets, expenses, and other funds accurately.
- Follow Kimberly-Clark travel rules and expense policies which are designed to maximize efficiencies and minimize costs.
- Be attentive to security procedures and be alert for situations that may lead to loss, theft, or misuse of Company resources.
- Keep personal use of Kimberly-Clark resources to a minimum. Occasional personal use of computers for e-mail or accessing the web, copiers and fax machines, and telephones is permitted as long as it does not distract from your job responsibilities and is in compliance with Kimberly-Clark policies and procedures.
- Do not allow other people, including friends and family members, to use Kimberly-Clark resources.
- Always use your own user ID and password while on a Kimberly-Clark computer and never give out your password to anyone.

- Only properly-licensed software should be used on Kimberly-Clark computers and mobile devices. Software should not be copied from device to device unless the software license permits it.
- Treat Company assets with care and avoid any use that might lead to loss or damage.

For further information, read the following:

[Corporate Financial Instructions \(CFIs\)](#); [Acceptable Internet Use Policy](#); [E-mail Policy](#); [E-mail Guidelines](#); [Information Systems Resources Policy](#); [Unsolicited Ideas Policy](#); [Property and Asset Protection Guidelines](#); [Security Procedures](#); [Statement of Accountability](#); [Data Privacy Policy](#); [Global IT Standards](#)

Q. I just got an e-mail from my team leader which makes fun of another employee's looks. I thought it was funny and I sent it on to a few others in my contact list. **Have I misused company resources just by sending an e-mail?**

A. Yes. E-mailing or forwarding e-mails with inappropriate jokes or content is a misuse of resources and therefore a violation of the Code of Conduct. If you receive these e-mails, delete them. And if you're comfortable speaking to your team leader about it, provide feedback and ask them not to send such e-mails any more.

Q. I'm doing volunteer work for a local hospital. Every month they need me to make copies of flyers. **I bring my own paper from home; is it okay for me to use the office equipment?**

A. It depends. Occasional incidental use would be acceptable, but this appears to be a regular activity. While you would be using your own paper, you are still using Kimberly-Clark resources, such as toner, ink, and network bandwidth. Therefore you should check with your team leader or the Legal Department to determine if this is in the interest of Kimberly-Clark.

GIFTS, ENTERTAINMENT AND OTHER FAVORS

Accepting or giving gifts, entertainment, and other favors may create a potential, perceived, or actual conflict of interest or even violate local laws. "Gifts, entertainment, and other favors" means anything of value. Examples of these include, but are not limited to: meals, lodging, discounts, prizes, travel, tickets, money in any form, stock, or Kimberly-Clark products. While general guidance is given below, local regions or countries or specific businesses may adopt more strict guidance in accordance with local policy or laws.

Accepting Gifts, Entertainment or Favors

In the course of your work for Kimberly-Clark, you may be offered gifts, entertainment, or other favors from customers, suppliers, vendors, or other business contacts. Although you may feel that accepting such things would not affect your behavior, it may cause some people to feel that they should do something in return. This could affect their ability to make objective business decisions in the best interest of Kimberly-Clark. To prevent such situations you should comply with the following guidelines:

In general, the only kinds of gifts or entertainment that you may accept from anyone who does or may do business with Kimberly-Clark are:

- Infrequent gifts having a value of \$50 USD or less, such as chocolates, food, pens, calendars, or small promotional items. Teams or groups of employees may also accept larger gifts having a value of \$250 USD or less such as food gift baskets during the holidays for use by all team members.
- An event ticket to a sport, theater, or other cultural event or entrance into other forms of entertainment (e.g. round of golf) that is generally available to the public. Such tickets may be accepted from a specific business associate or company one time per year but you must personally reimburse the giver for the face value of the ticket. If such reimbursement is impractical or unreasonable you must seek approval from a Vice President or higher level in advance. Tickets to elite events such as the Olympics, World Cup or Super Bowl that are generally not available to the public should never be accepted.
- Gifts obtained as a result of attending an event in which Kimberly-Clark sponsors your attendance are acceptable.

- Gifts or event tickets should never be solicited from suppliers, vendors or customers for use in internal events, auctions, charitable events or other similar events unless they are for a charitable event approved by a Vice President or higher level in advance.

Meals that are necessary when traveling or when otherwise conducting business with business contacts should be reasonably priced. It is preferred that such meals be paid for entirely by Kimberly-Clark or split although it can be acceptable to alternate when multiple meals are expected. If possible, meals should be paid for by the most senior ranking Kimberly-Clark employee in attendance. Meals that are provided at larger events you are attending on behalf of Kimberly-Clark (e.g. lunch provided at industry related conferences, educational or training events, etc.) can be accepted if reasonable. Alcohol should always be reasonably priced and consumption must be limited to a socially acceptable amount. Rules and guidelines regarding respectful workplace also apply to business meals, entertainment, conferences and other social gatherings.

If you believe an exception is warranted due to the gift, entertainment or other favor having a legitimate business purpose, please discuss and obtain approval from a Vice President or higher level in advance and retain a written record of such approval. For example, send a confirming e-mail to the person authorizing the exception. It is the responsibility of the employee who has obtained such an approval to retain a record of that authorization. Vice Presidents cannot approve exceptions for their own behavior and must obtain approval from a Vice President in Legal. For example, if attendance at a sporting event has a legitimate business purpose, it may be acceptable to purchase the ticket at full face value and expense it as a normal business expense if approved by a Vice President or higher level and if your budget allows. Regardless, attendance by spouses or other guests is normally not acceptable unless paid for personally by the Kimberly-Clark employee.

CONDUCT TIP

Accepting expensive gifts from a vendor (e.g. \$500 USD of Italian china) can lead to termination.

Accepting Gifts, Entertainment, or Favors continued:

Each of us must not:

- Accept anything from a business contact if it will make you feel you should do, or promise to do, anything in return.
- Accept anything in return for giving someone Kimberly-Clark business.

If you receive anything that does not meet these guidelines, you should return it and explain that our policy does not allow you to keep it. If it would violate a social custom to return it, talk to your team leader or Human Resources about donating it to charity or another solution. If you are not sure whether the gift, entertainment or favor offered to you violates these guidelines or your local policy, talk to your team leader or the Legal Department.

Giving Gifts, Entertainment, or Favors to Business Contacts

We are committed to winning business based on the superior features, benefits, and quality of our products and services. Offering gifts, entertainment or favors to business contacts in order to obtain an improper advantage is unethical and may be illegal. However, there are occasions where it is acceptable to give a modest gift or entertainment to a business contact in order to build or sustain a business relationship and goodwill, keeping it to a minimum.

In general:

- Do not give gifts, entertainment, or favors to the same person or company more than occasionally.
- Limit gifts, entertainment and favors being given to what is reasonable and appropriate under the circumstances. You must obtain approval at a Vice President or higher level before giving gifts and entertainment valued at more than \$50 USD per person.
- Do not give gifts, entertainment, or favors if you are doing it to make the other person feel obligated to give business to Kimberly-Clark.
- Do not provide gifts or entertainment that may appear to violate our commitment to respect each other.
- Make sure that you are not violating the other company's gift and entertainment policy.

- Never give cash, checks, money orders, gift certificates, coupons, loans, or other types of money or money equivalent.
- Ensure you are in compliance with any local policy applicable in your region/country.

Q. I offer a vendor an expensive ticket to the World Cup at Kimberly-Clark's cost and I later accept from the same vendor an even more expensive ticket to the Olympics.

Isn't that okay?

A. No. Both are wrong. You should not be offering expensive gifts to vendors and just because you have given an expensive gift does not mean you can then accept a more expensive gift.

Q. A vendor who has recently been awarded a long term contract would like to build stronger relationships with the few Kimberly-Clark employees with whom it frequently interacts. The vendor has offered them tickets for an upcoming professional football game to join their dedicated Kimberly-Clark support team.

Can the employees accept the tickets?

A. It depends. Accepting tickets to events such as professional football games where there is a legitimate business purpose without personally paying for them can be acceptable but only if approved in advance by a VP or higher level and only if accepted no more than once per year from the same vendor. Such tickets should preferably be paid for and expensed.

Q. A vendor offered to deliver scrap materials from a project he completed to my house. The project is finished and Kimberly-Clark would just throw away the scrap materials anyway. **Is this okay?**

A. No. Never accept items from Kimberly-Clark vendors for personal use.

GIFTS, ENTERTAINMENT OR FAVORS TO GOVERNMENT OFFICIALS

Nearly all countries have laws to prevent bribery and corruption. Additionally, anti-corruption laws of some countries may apply not only to actions taken by Kimberly-Clark employees inside these countries but also to actions taken in foreign countries by Kimberly-Clark subsidiaries and others working on behalf of, or for the benefit of, Kimberly-Clark. Violations of those anti-corruption laws could subject the Company to severe penalties and significantly damage our public reputation.

You must not offer, promise or give, directly or indirectly, anything of value, regardless of amount, to induce or influence any official government decision or to secure an improper advantage. Examples of payments that may be forbidden include cash gifts, meals, entertainment, business opportunities, Company product, offers of employment, contributions to charitable organizations and more. Additionally, you must not make “facilitating payments” or “expediting payments” to government officials. All of these activities could be considered bribery or corruption.

If the government official might be considered a Healthcare Professional, even stricter rules may apply to interactions with such person.

Do not give or accept bribes and prevent others from doing so. The Legal Department can provide advice on what would be prohibited by law or the Code. Kimberly-Clark has also adopted several policies which provide additional guidance.

For further information, read the following:
[Conflicts of Interest, Gifts and Disclosure of Confidential Information Policy](#); [Conflicts of Interest, Gifts and Disclosure of Confidential Information Policy Instruction](#); [Anti-Corruption Policy](#); [Anti-Corruption Policy Instruction](#); [Guidelines for Interactions with Healthcare Professionals](#)

Q. Who is a government official?

A. A government official is anyone employed by any government or government-controlled enterprise or political party, such as officers, environment and health inspectors, customs officers, postal workers, members of a legislative body, and employees of government-owned hospitals.

Q. The only way I can obtain a visa in time to make a business trip in another country is if I make an extra payment to an official at that country's embassy. **Can I do that?**

A. No. Laws of most countries prohibit making payments of this nature and the Company forbids making these payments in any country.

Q. The mayor of our town is coming to visit the plant for a groundbreaking ceremony for our new building. **May I provide him with a gift bag full of product samples?**

A. It depends. Many local officials are prohibited by local law and their own ethics codes from accepting any gifts, however small. Gifts to public officials are prohibited by the U.S. Foreign Corrupt Practices Act if the gifts are meant to influence a decision. Since this is a complicated area and penalties can be severe, you should discuss it with the Legal Department before offering any gifts to a government official.

Q. I was told I have to pay extra to a customs official to clear our products through customs. **Can I do that?**

A. No. Laws of most countries prohibit such payments under any circumstance, and the Company forbids making such payments in any country.

RECORD RETENTION

We are committed to creating Company records that accurately and fairly present our activities and transactions, and then maintaining those records for so long as required by law or our record retention schedules. Our record retention schedules can be found at the [Corporate Record Administration](#) website.

Some examples of Company records are:

- Agreements.
- Invoices.
- Employment records.
- Expense reports.
- Laboratory notebooks.
- Import/Export documentation.
- Manufacturing and Production reports.
- Quality records.
- Research and development tests.
- Environmental records.
- Sales activity reports.

As required by applicable laws, the Company has policies on the proper administration, maintenance, and retention of records and each of us is responsible for complying with those policies. This means that records must be true and correct, they must be kept and made available to those who need them for their jobs, and they must be properly disposed of when no longer required to be kept by law or, as required, by our record retention schedules.

Q. Our record retention policy states we should only keep e-mails for a certain length of time but I would like to transfer all of my e-mails to a thumb drive and keep it forever. It doesn't take up Kimberly-Clark storage space. **Isn't this okay since I know I will need some of my e-mails after the retention period has expired?**

A. No. We all have a duty to dispose of records, such as e-mails when they are no longer required to be kept by law or by our record retention schedules.



FINANCIAL REPORTING

Kimberly-Clark is committed to providing fair, accurate, and timely disclosure of financial information. Reporting of financial information requires the highest standard of fairness and honesty.

The integrity of the Company's accounting and financial records is based on the accuracy and completeness of basic information supporting entries to the Company's books and accounts. The harm done to the Company's reputation and to its investors by fraudulent or misleading reporting can be severe.

Dishonest financial reporting can also result in civil or criminal penalties to the individuals involved and to the Company. The reporting of any false or misleading information in internal or external financial reports is strictly prohibited.

All employees have a role in ensuring our financial integrity:

- Ensure transactions are properly authorized and recorded properly in a timely manner.
- Properly protect Company assets and compare asset records with actual assets regularly.
- Submit, or approve, only valid business expenses for reimbursement.
- Follow Corporate Financial Instructions to ensure accuracy and reliability of accounting records.
- Make accounting decisions based on accounting standards and Kimberly-Clark policies.
- Do not make any false or unsupported statements or entries in the books and records of our Company or in any public disclosure, nor in any internal or external correspondence.

If you become aware of any omission, falsification, or inaccuracy of reported information, promptly communicate the information in accordance with the [Protocol for Reporting and Escalation of the Code of Conduct Issues](#).

For further information, read the following: [Records Creation, Retention and Destruction Policy](#); [Corporate Records Administration](#); [Accounting Policies and Practices Policy](#); [Corporate Financial Instructions \(CFIs\)](#); [Internal Control Policy](#); [CFI 27-50 Employee Expense Reimbursement](#); [Expense Reimbursement Policy](#); [Anti-Corruption Policy](#)

Q. It is near the end of the year, and I have money left in my budget. **Can I prepay an expense I know I will have next year so that it will be applied to this year's budget?**

A. No. You must record expenses in the proper accounting period. Charge activities to the year in which they occur. If you need to prepay this year for an activity occurring next year, contact your local finance team to record the item as a prepaid expense.

Q. My team leader has asked my team to work as many hours as it takes to get our production goal, but there seems to be an "unwritten rule" that overtime is prohibited and only 40 hours should be put on our time reports. **What should I do?**

A. Report it. You should report the actual hours that you work at all times in accordance with local policies, law, and collective bargaining agreements. If your team is working overtime, you should report that overtime accurately. If you are not approved to work overtime, you should stop working when your shift is complete. Never work "off the clock" hours. [Resources for Asking Questions or Reporting Concerns](#)

Q. My team leader asked me to prepare a purchase order for \$40,000, but her approval authority is only \$20,000. **Can I break the request into two purchase orders to avoid having to get an approval from a higher level?**

A. No. Create the purchase order for the \$40,000 and obtain the necessary approvals. If you are uncomfortable challenging your team leader, report it to the Legal Department or the Code of Conduct Line. [Resources for Asking Questions or Reporting Concerns](#)

FRAUD PREVENTION

All fraudulent activities are strictly prohibited. Kimberly-Clark expects employees to:

- Act with honesty and integrity when working with Company materials, funds, and financial reporting systems.
- Prevent, detect, and report fraud.

Some examples of fraud are as follows:

- Stealing cash, inventory, product, or other assets.
- Using company funds to buy equipment, supplies, or materials for personal benefit.
- Receiving money or gifts from suppliers in exchange for giving them Kimberly-Clark business.
- Submitting false or misleading requests for reimbursement.
- Collecting “workers” compensation when you are no longer injured or affected by the incident.
- Writing off recoverable assets or debts.
- Using Company assets for personal benefit.
- Recording sales before the sale is delivered/earned.
- Falsifying time cards or time reporting.
- Making entries into the accounting system that are not valid.
- Authorizing or receiving payment for goods not received or services not performed.
- Authorizing or receiving payment for hours not worked or expenses not accrued and documented.
- Forgery of any type.

Q. A customer has asked me to record sales this month for deliveries we’ll make next month.
What should I do?

A. Don’t do it. This can impact our financial results and is considered fraud. Discuss it with your team leader so they know the difficulties you are facing with this customer.

Q. Over the weekend, I accidentally used my corporate credit card to put gas in my personal vehicle. **Am I going to get into trouble?**

A. No. We all make mistakes. Just make sure you indicate this in your next expense report and provide payment to cover the charges. However, if this is a habitual problem, there may be disciplinary actions.

DOING WHAT'S RIGHT IS THE KIMBERLY-CLARK WAY

Reading the Code is just a start. We expect everyone to act ethically, legally, and in compliance with the Code of Conduct at all times. **Doing What's Right is the Kimberly-Clark Way.** Each of us is responsible for our own compliance with the Code, to report suspected violations, and to cooperate in the Company's investigation of potential violations. You cannot lose your job or your benefits, or be demoted, suspended, threatened, harassed, or discriminated against for raising a Code of Conduct concern in good faith.

The Code is intended to provide guidance on what is "right" when dealing with customers, suppliers, other employees, competitors, and the public. There are a number of resources available to you to answer questions or for reporting violations. See [Resources for Asking Questions or Reporting Concerns](#) in this Code.





CODE OF CONDUCT LINE NUMBERS

To access the latest listing of Code of Conduct Line numbers, please go to KCHelpLine.com.



*“By Doing What’s Right every day and being committed to our **Code of Conduct**, you can help us build a positive, productive workplace. And that’s the kind of workplace we all deserve.”*

- Thomas J. Falk
Chairman of the Board and
Chief Executive Officer

