

California Transparency in Supply Chain Act

January 3, 2012

Zep Inc. is committed to ensuring that its suppliers and vendors comply with all laws and regulations in each country where we conduct business. Specifically, Zep Inc. has developed and implemented a Supplier Code of Conduct and Business Ethics (the "Code"), which sets out Zep's expectations and requirements for its vendors and suppliers when conducting business with or on behalf of the Company and our affiliates, including Zep Sales & Service, Zep Commercial Sales & Service and Amrep. Zep Inc. expects its suppliers and vendors to act ethically and honestly at all times. Specifically, the Company expects its vendors and suppliers to recognize that human trafficking is a crime and should take steps to eradicate slavery and human trafficking from their direct supply chains.

As part of its Supplier Code of Conduct and Business Ethics, Zep Inc. reserves the right to audit its vendors and suppliers in the future to ensure compliance with the Code. The audit may address the requirements described in the Code including the vendors' and suppliers' compliance with local laws, codes, regulations and the like addressing human trafficking and slavery. While Zep Inc. does not require our suppliers and vendors to certify that they are in compliance with applicable slavery and human trafficking laws, we expect they will conduct business in a socially responsible manner. The supplier and vendor audits, however, will review steps taken to evaluate their own labor practices to minimize and/or eliminate the likelihood that they are involved in or doing business with companies that participate in slavery or human trafficking.

Finally, Zep Inc. has adopted a Code of Ethics and Business Conduct. This Code of Ethics and Business Conduct explains and describes specific standards of business conduct applicable for its associates and third-parties who do business with or on behalf of the Company. These standards are designed to protect the integrity of the Company and to ensure compliance with laws and regulations wherever the Company conducts business. Conduct that violates these standards may result in disciplinary action up to and including termination of employment from the Company or a termination of a third-party business relationship. While the Company's Code of Ethics and Business Conduct does not specifically address slavery and human trafficking, it does require Zep associates and third-parties doing business with or acting on behalf of the Company to act ethically, honestly, and in compliance with all laws and regulations.