The Clorox Company

Return on Invested Capital (Unaudited) (1)

Reconciliation of earnings from continuing operations before income taxes to return on invested capital (ROIC)

Dollars in millions and all calculations on a rounded basis

			Including discontinued operations	
	FY11 (2)	FY10 (2)	FY10 (3)	FY09 (2)(3)
Earnings from continuing operations before income taxes	**$ 563**	**$ 805**	**$ 805**	**$ 709**
Earnings from discontinued operations before income taxes	-	-	120	102
Earnings before income taxes	**563**	**805**	**925**	**811**
Restructuring and asset impairment costs (4)	4	4	4	19
Non-cash goodwill impairment (4)	258	-	-	-
Interest expense (5)	123	139	139	161
Earnings from continuing operations before income taxes, restructuring and asset impairment costs, non-cash goodwill impairment, and interest expense	$ 948	$ 948	$ 1,068	$ 991
Adjusted after tax profit (6)	**$ 628**	**$ 619**	**$ 696**	**$ 656**
Adjusted average invested capital (7)	$2,684	$2,645	$ 3,049	$ 3,019
Return on invested capital (8)	**23.4%**	**23.4%**	**22.8%**	**21.7%**

(1) In accordance with SEC's Regulation G, this schedule provides the definition of a non-GAAP measure and the reconciliation to the most closely related GAAP measure.

Management believes the presentation of return on invested capital (ROIC) provides additional information to investors about current trends in the business. ROIC is a measure of how effectively the company allocates capital. Beginning with fiscal year 2008, the company adopted a simplified ROIC calculation (see definition below).

(2) As disclosed in the fiscal 2011 Annual Report.

(3) Management believes ROIC calculated on earnings before income taxes for fiscal years 2010 and 2009, including discontinued operations, provides investors with historical information that helps quantify the impact of excluding discontinued operations from ROIC on a continuing operations basis.

(4) Noncash restructuring and asset impairment costs and the non-cash goodwill impairment charge of $258 for the Burt's Bees business are added back to earnings and average invested capital to more closely reflect operating results.

(5) Interest expense is added back to earnings because it is factored in debt, a component of average invested capital (as defined below).

(6) Adjusted after tax profit represents earnings from continuing operations before income taxes, restructuring and asset impairment costs, the non-cash goodwill impairment charge and interest expense; after tax. The tax rate applied is the effective tax rate on continuing operations before the non-cash goodwill impairment charge, which was 33.8%, 34.7% and 33.5% in fiscal years 2011, 2010, and 2009, respectively. The difference between the fiscal year 2011 effective tax rate on continuing operations before the non-cash goodwill impairment charge and the effective tax rate on continuing operations of 49.0% is (16.0)% related to the non-deductible non-cash goodwill impairment charge and 0.8% for other tax effects related to excluding this charge.

(7) Average invested capital represents a five quarter average of total assets less non-interest bearing liabilities and assets held for sale. Adjusted average invested capital represents average invested capital adjusted to add back a five quarter average of cumulative, current-year after-tax restructuring and asset impairment costs. See below for details of the adjusted average invested capital calculation:

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(amounts shown below are five quarter averages)	FY11 (2)	FY10 (2)	Including discontinued operations FY10 (3)	FY09 (2)(3)
Total Assets	$ 4,343	$ 4,585	$ 4,592	$ 4,548
Less: non-interest bearing liabilities	(1,638)	(1,538)	(1,545)	(1,534)
Less: assets held for sale	(175)	(404)	-	-
Average invested capital	**2,530**	**2,643**	**3,047**	**3,014**
Cumulative after-tax restructuring and asset impairment costs	154	2	2	5
Adjusted average invested capital	**$ 2,684**	**$ 2,645**	**$ 3,049**	**$ 3,019**

(8) ROIC is calculated as earnings from continuing operations before income taxes, excluding restructuring and asset impairment costs, non-cash goodwill impairment and interest expense, computed on an after-tax basis as a percentage of adjusted average invested capital (as defined above).