March 12, 2025

Oil-Dri Corporation of America Code of Ethics and Business Conduct

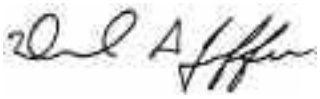
We, the employees, officers and directors of Oil-Dri Corporation of America and its subsidiaries ("Oil-Dri") will always conduct ourselves in accordance with the WECARE values:

Work/Life Balance
Ethics

Communication, Customer Focus and Continuous Improvement
Accountability
Respect
Excellence

This Code of Ethics and Business Conduct details how we must act in accord with these fundamental standards. The Code covers a wide range of business practices and procedures. It does not cover every issue that may arise, but it sets out basic principles to guide all employees, officers, and directors of the Company. All of our employees, officers and directors must conduct themselves in accordance with these principles and should seek to avoid even the appearance of improper behavior. The Code should also be provided to and followed by the Company's agents and representatives, including consultants.

Individuals who violate the standards in this Code will be subject to disciplinary action, up to and including termination of employment. Compliance with this Code is an important part of protecting the values that have made Oil-Dri a uniquely wonderful place to work since we opened our doors in 1941.



DANIEL S. JAFFEE
President and Chief Executive Officer

Compliance with the Law

Obeying the law is the foundation of Oil-Dri's ethical standards. All employees, officers and directors must comply with all laws, rules and regulations applicable to Oil-Dri's business in the localities, states and countries in which the Company does business. If a law conflicts with a policy in this Code, you must comply with the law.

Although individuals cannot be expected to know the details of all the laws applicable to our business, employees, officers, or directors should seek advice from their supervisors or Oil-Dri's legal department whenever they have questions concerning how laws may apply to our business.

Treating the Public Fairly

Accurate Accounts and Recordkeeping

Oil-Dri observes stringent standards in the keeping of financial records and accounts. It is the responsibility of each employee, officer or director to uphold these standards. This includes accurate reporting of hours worked and business expense accounts. The Company has adopted controls in accordance with internal needs and the requirements of applicable laws and regulations. These established accounting practices must be followed to ensure the complete and accurate recording of all transactions.

No employee, officer or director may interfere with or seek to improperly influence, directly or indirectly the preparation or auditing of the Company's financial records.

Accurate and Prompt Reporting

Oil-Dri will make full, fair, accurate and understandable disclosure in reports filed with, or submitted to, the United States Securities and Exchange Commission and in all other public communications. The management and directors of Oil-Dri are responsible for seeing to it that reports are filed in a timely manner and that reports regarding the financial condition and operating results of the Company fairly and accurately present that condition and those results.

Insider Trading Prohibited

It is Oil-Dri policy that all employees, officers and directors are prohibited from trading in Oil-Dri securities while in possession of material nonpublic information. The Oil-Dri's Board of Directors has adopted an insider trading policy (the "Insider Trading Policy") both to satisfy the company's obligation to prevent insider trading and to help employees avoid the severe consequences associated with violations of insider trading laws. A copy of the Insider Trading Policy is available on the Oil-Dri website. If you have questions, please consult the Compliance Officer (as defined in the Insider Trading Policy).

Record Keeping and Retention

Oil-Dri requires honest and accurate recording and reporting of information in order to make responsible business decisions. All of the Company's books, records, account and financial statements must be maintained in reasonable detail, must appropriately reflect the Company's transactions and must conform both to applicable legal requirements and to the Company's system of internal controls. Unrecorded or "off the books" funds or assets should not be maintained unless permitted by applicable law or regulations.

All functional areas within Oil-Dri generate records in tangible or electronic form. The proper identification, retention, protection, retrieval, and disposition of these records is very important. The Company has developed a Records Retention Policy which details the guidelines for records retention and disposition. Oil-Dri managers and supervisors are responsible for implementing and conducting record management programs in compliance with the Company's Records Retention Policy. Employees who are unsure about the need to keep particular documents should consult with their supervisors.

Treating Employees Fairly

Equal Employment Opportunities & Freedom from Harassment

To provide equal employment and advancement opportunities to all individuals, employment decisions at Oil-Dri will be based on merit, qualifications and abilities. Oil-Dri does not discriminate in employment opportunities or practices on the basis of race, color, religion, sex, national origin, age, sexual orientation, gender identity, veteran status, disability or any other characteristic protected by law. Oil-Dri will make reasonable accommodations for qualified individuals with known disabilities unless doing so would result in an undue hardship on the Company.

This policy governs all aspects of employment, including selection, job assignment, compensation, discipline, termination and access to benefits and training.

Oil-Dri is committed to providing a workplace that is free of any form of harassment. Harassment lowers the morale and dignity of all employees and has a direct negative effect on productivity. Any form of harassment is a serious violation of Company policy, and Oil-Dri takes allegations of harassment seriously and will respond promptly.

Everyone must be given an equal opportunity to succeed regardless of race, color, religion, gender, sexual orientation, gender identity, veteran status, handicap or disability, pregnancy, marital status, national origin or age. Harassment or unequal treatment of any member of the organization based on such arbitrary characteristics has no place at Oil-Dri. The diversity of our workforce is one of our strengths; and each employee's uniqueness should be treated with tolerance and respect.

Treating the Company Fairly

Avoid Conflicts of Interest

Employees, officers and directors have an obligation to conduct business in a manner that avoids actual or potential conflicts of interest. This policy establishes only the framework within which Oil-Dri wishes to operate. The purpose is to provide general direction so that individuals can seek further clarification on issues related to the subject of acceptable standards of operation.

A "conflict of interest" exists when a person's interest interferes in any way with the interests of the Company. A conflict situation can arise when an employee, officer or director takes action or has interests that may make it difficult to perform his or her Company work objectively and effectively. Conflicts of interest may also arise when an employee, officer or director, or members of his or her family, receive improper personal benefits as a result of his or her position in the Company. Loans to, or guarantees of obligations of, employees and their family members may create conflicts of interest.

Conflicts of interest are not always clear-cut. If employees, officers or directors have any influence on transactions involving purchases, sales, contracts, or leases, it is imperative that they disclose to a senior officer or the general counsel of Oil-Dri as soon as possible the existence of any actual or potential conflict of interest so that safeguards can be established to protect all parties.

Improper personal benefit may result not only in cases where an individual or family member has a significant ownership interest in a firm with which Oil-Dri does business, but also when an individual or family member receives any kickback, bribe, substantial gift, or special consideration as a result of any transaction or business dealings involving Oil-Dri. As such, Oil-Dri will prohibit an employee, who is related by blood or marriage to an employee of a customer or supplier, to be placed in a business relationship where one family member has influence over the purchasing or sales transactions of the other. Oil-Dri does not support or allow anyone in a leadership or managerial capacity to have a romantic relationship with a subordinate employee or for employees to have a romantic relationship if such relationship causes a conflict of interest. Any personal, familial, financial or romantic relationships involving employees of the Company, our customers or suppliers should be disclosed immediately to the General Counsel to determine whether

there is a real, potential or perceived conflict between personal interests and those of the Company. Appropriate steps to remedy the conflict of interest will be taken, including those steps laid out in Oil-Dri's related party transactions policy (the "Related Party Transactions Policy"). A copy of the Related Party Transactions Policy is available on the Company's website.

Simultaneous employment by Oil-Dri and another firm, if the other firm is an Oil-Dri competitor, customer, distributor or supplier, is prohibited. This prohibition extends to benefits, loans or loan guarantees, and other forms of compensation. Service on the board of directors of, or as a consultant or advisor to, a competitor is also prohibited.

Company Assets

Proper use of Oil-Dri property, including material, facilities, equipment and information resources, is the responsibility of each individual. Employees, officers and directors should use these assets only for legitimate business purposes, maintaining them with care and guarding against theft, waste and abuse. Oil-Dri assets may never be used for illegal purposes. An employee must never borrow or remove Oil-Dri property without advanced written permission from his or her manager.

Company Electronic Resources

Oil-Dri provides its officers and other employees with a wide variety of electronic communication and document production and reproduction resources. These electronic resources include telephone, voice mail, radio, facsimile, photocopier, computer hardware, software and networks, and e-mail and Internet access. These resources are provided to support and facilitate Company business. The use of these resources should be limited to work related purposes; use for personal purposes is permissible only within reasonable limits.

An employee's improper use of electronic resources can create legal liability for both the employee and Oil-Dri and is strictly prohibited. Improper use includes:

- Engaging in illegal, fraudulent, or malicious activities;
- Sending, accessing, creating or storing offensive, obscene, or defamatory material;
- Annoying or harassing other individuals;
- Soliciting or advocating non-Company or purely personal interests.

Employees must also take care to use electronic communication resources in a professional manner which safeguards confidential information. An employee's use of the Internet, including participation in Internet chatrooms, in a manner that identifies the individual with the Company is subject to this policy and Oil-Dri's other professional standards even if the Internet access used is not provided by the Company.

Employees should always ensure that the information contained in e-mail, voice mail, Internet and other electronic messages is accurate, appropriate, lawful, and business-like. Avoid exaggeration, derogatory remarks, guesswork or inappropriate characterization of people or companies. This is particularly important because electronic messages and documents are easily and sometimes inadvertently sent or forwarded to persons other than the intended recipient. In addition, as Company property, voice mail, e- mail, Internet and other electronic records and documents are subject to disclosure to law enforcement or government officials or to other third parties through subpoena or other processes.

All computer files, databases, documents, voice messages, e-mail messages and information created, received or stored using Oil-Dri electronic resources are the property of the Company. Employees should not have any expectation of privacy with respect to messages or files sent, received, or stored using Oil- Dri's electronic resources. E-mail messages, voice mail messages and Internet records are to be treated like shared paper files, with the expectation that anything in them is available for review by authorized Oil-Dri representatives. By using the Company's electronic resources an employee acknowledges and consents to Oil-Dri's right to monitor, inspect and otherwise access all use of the resources.

Passwords and other log-in information for voicemail, computer network, computer mainframe and other computer and Internet applications used for an employee's work are important for keeping unauthorized

individuals from accessing these systems. Failure to keep passwords confidential can allow unauthorized individuals to read, modify, or delete information or messages; circulate unauthorized e-mail; or download or manipulate files or programs. Log-on and other passwords may not be shared with any third party, nor may they be shared with another employee, unless requested by an authorized management representative of Oil-Dri. The practice of using passwords should not lead employees to expect privacy with respect to messages sent or received or Internet use.

Oil-Dri has numerous licenses to utilize computer software. These license agreements contain restrictions concerning software use, duplication, and copyright protection. Only software that has been authorized and purchased by the Company should be loaded or used on any Company computer. Software purchased or provided by the Company is not to be altered in any manner including, but not limited to decompiling, disassembling, cross compiling, reverse engineering, and creating derivative works.

Confidential Information

Employees, officers and directors must not disclose to third parties any confidential information which they receive in the course of their duties, or by virtue of their connection with Oil-Dri except when disclosure is authorized or legally mandated. Such confidential information includes but is not limited to the following:

1. Proprietary information relating to existing or new products;
2. Machine and process development;
3. Manufacturing know-how and specifications;
4. Cost and pricing practice including detailed costing information;
5. Customer lists, records of or information about customers' requirements and/or volumes; information regarding existing or prospective customer relationships;
6. Personnel records;
7. Financial records;
8. Information regarding acquisitions, joint ventures, divestitures and/or mergers;
9. Contracts.

All Oil-Dri employees, officers or directors have access to some confidential information in the performance of their normal duties and are responsible for exercising care in keeping such information secure from unnecessary or unintended disclosure to others verbally, in writing or by electronic means (voice mail, email, Internet chat rooms, etc.). This obligation applies both during and outside of normal working hours. This obligation also applies to former employees, officers or directors who are no longer affiliated with the Company.

No employee, officer or director in possession of confidential information may use such information for his or her personal benefit or enable others inside or outside the Company to do so. The same applies to confidential information learned about other companies with whom Oil-Dri is currently doing business, has done business or may do business in the future.

Competition and Fair Dealing

Accepting and Giving Gifts

Accepting Entertainment, Gifts, Favors, and Gratuities:

No employee, officer or director shall solicit or accept any gift, gratuity, favor, entertainment, reward or any other thing of monetary value that might influence or appear to influence the judgment or conduct of the individual in the performance of his or her job. Gifts or entertainment may be accepted only in cases where the gifts or entertainment are of nominal value, are customary in the industry, will not violate any laws and will not influence or appear to influence the individual's judgment or conduct in the Company's business. In some situations, it may be impractical or harmful to refuse or return a gift. When this happens, immediately discuss the situation with the Legal Department.

Giving Entertainment, Gifts, Favors, and Gratuities:
No employee, officer or director shall give any gift, gratuity, favor, entertainment, reward or any other thing of monetary value that might influence or appear to influence the judgment or conduct of the recipient in the performance of his or her job. Gifts or entertainment may be provided only in cases where the gifts or entertainment are of nominal value, are customary in the industry, will not violate any laws and will not influence or appear to influence the recipient's judgment or conduct at his or her employer's business. Gifts must be properly recorded on company books and approved by management according to company policy before the gift is given. Oil-Dri employees may never pay bribes or provide any cash or cash equivalents to any person. Employees may not provide any gift if it is prohibited by law, company policy, or the policy of the recipient's organization.

Antitrust Compliance

All employees, officers and directors are expected to comply with the antitrust laws of the United States and, when applicable, the antitrust laws of the other countries in which Oil-Dri operates. These laws prohibit practices in restraint of trade, including agreements between competitors to fix prices, divide customers or markets, or rig bids.

The provisions of the antitrust laws apply to both formal and informal communications. Employees, officers or directors involved in trade association activities or in other situations allowing for less formal communication among competitors, customers or suppliers must be especially alert to the requirements of antitrust laws.

Competition and Fair Dealing

Oil-Dri seeks to outperform our competition fairly and honestly. We seek competitive advantages through superior performance, never through unethical or illegal business practices. Stealing proprietary information, possessing or utilizing trade secrets obtained without the owner's consent, or inducing such disclosures of information by past or present employees of other companies is prohibited.

All employees officer and directors should deal fairly with Oil-Dri's customers, suppliers, competitors and employees. No one should take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other intentional unfair- dealing practice.

Political Contributions

Oil-Dri encourages its employees, officers and directors to become involved in civic affairs and to participate in the political process. However, such participation must be on an individual basis, on the individual's own time and at his or her own expense. U.S. law prohibits corporations from donating corporate funds, goods, or services, directly or indirectly, to candidates for federal office. Other laws governing political contributions and activities, including state, local and the laws of other countries in which Oil-Dri does business, must be followed as well.

Complying with this Code

All employees, officers and directors have a responsibility to understand and follow this Code of Ethics and Business Conduct. In addition, all are expected to perform their work with honesty and integrity and in compliance with the law in areas not specifically addressed by the Code. A violation of the Code of Ethics will result in appropriate disciplinary action, including possible termination of employment without additional warning.

Compliance Questions & Reporting Violations

Oil-Dri realizes that individuals will have questions from time to time about how best to comply with the Code of Ethics or how to deal with situations not specifically addressed in the Code which require ethical decisions. As a member of the Oil-Dri team, it is your responsibility to report suspected compliance violations within 72 hours of identification and to cooperate with any follow-up investigations. Employees are required to come forward with such information, without regard to the identity or position of the

suspected offender.

If you have any questions about this Code of Ethics, or wish to report suspected violations, you can contact the Legal Department and/or Confidential Whistleblower Hotline at any time. All reports are confidential, and the identity of the reporter will remain anonymous.

Accounting Concerns: Concerns about suspected improper auditing or accounting practices may be brought directly to the attention of a member of the Audit Committee of Oil-Dri's Board of Directors. You can contact the Audit Committee (or any member of that committee) by addressing your concern to "Audit Committee Oil-Dri Corporation of America" 410 N. Michigan Ave., Chicago, IL 60611. To the extent possible consistent with its legal duties, the Audit Committee and the Board will treat such submissions confidentially. Anonymous submissions may also be made.

Directors' Compliance Concerns: Directors should report any compliance concern or discuss any compliance question with Oil-Dri's General Counsel.

No Retaliation

All reports of possible violations of the Code of Ethics are taken seriously. In compliance with the law, as well as with our WECARE values, Oil-Dri will treat information concerning reporting of potential violations in a confidential manner (consistent with appropriate evaluation and investigation) and will seek to ensure that no acts of retribution or retaliation are taken against anyone for making a good faith report.
Retaliation in any form against a person who reports a violation of the Code or of the law, even if the report is mistaken, or who assists in the investigation of a reported violation, is itself a serious violation of the Code. Acts of retaliation should be reported immediately and will be disciplined appropriately.

Waivers of the Code of Business Conduct and Ethics

If an employee believes that a waiver of this Code is necessary or appropriate, including, but not limited to any potential or actual conflict of interest, a request for waiver and the reasons for the request must be submitted in writing to Oil-Dri's general counsel. An executive officer or director must submit any request for waiver of the Code to the Chairman of Oil-Dri's Board of Directors or the chairman of any authorized committee of the Board. Any waiver of this Code for an executive officer or director may be made only by the Board of Directors, or an authorized committee of that board and will be promptly disclosed as required by law or stock exchange regulation.

Special Responsibilities of CEO and Senior Financial Officers

Oil-Dri's Chief Executive Officer, Chief Financial Officer, Controller and any person performing similar functions on behalf of the Company (collectively referred to below as "Financial Officers") are bound by the provisions of this Code of Ethics and Business Conduct. Additionally, because these Financial Officers have a such an important role in preserving the Company's integrity in financial matters, they have the following responsibilities:

1. Financial Officers are responsible for full, fair, accurate, timely and understandable disclosure in the periodic reports required to be filed by the Company with the Securities and Exchange Commission. It is the responsibility of each Financial Officer to bring to the attention of the Audit Committee any material information of which he or she may be aware that affects the disclosures made by the Company in its public filings.
2. Each Financial Officer shall promptly bring to the attention of the Audit Committee any information he or she may have concerning (a) significant deficiencies in the design or operation of internal controls which could adversely affect the Company's ability to record, process, summarize or report financial data or (b) any fraud, whether or not material, that involves management or other employees who have a significant role in the Company's financial reporting, disclosures or internal controls.
3. Each Financial Officer shall promptly bring to the attention of the General Counsel, the CEO or

the Audit Committee any actual or apparent conflicts of interest between personal and professional relationships, either involving themselves or any other employee, officer or director, and any material transactions that could give rise to such a conflict.

4. Each Financial Officer shall promptly bring to the attention of the General Counsel, the CEO or the Audit Committee any information he or she may have concerning evidence of a material violation of the securities or other laws, rules or regulations applicable to the Company and the operation of its business, by the Company or any agent of the Company.

The Board of Directors shall have the responsibility to determine, or designate appropriate persons to determine, applicable actions to be taken in the event of violation of this Code of Ethics and Business Conduct, including the above listed responsibilities, by any Financial Officer.