



COLGATE-PALMOLIVE COMPANY

Respecting Human Rights and Labor Rights:
Modern Slavery/Fundamental Human Rights and Decent
Working Conditions Statement

Colgate-Palmolive Company and its subsidiaries (collectively, the "Company," "Colgate-Palmolive," "we," "us" and "our") strongly oppose modern slavery and disregard for fundamental human rights and decent working conditions by any person or organization, including our business partners. Furthermore, as a global company, we are committed to compliance with applicable laws to secure fundamental human rights and decent working conditions.

This consolidated Statement describes the Company's efforts to address fundamental human rights, including modern slavery and decent working conditions and relates to our fiscal year that began January 1, 2022 and ended December 31, 2022. This Statement applies to our own business, our business partners and the supply chains of all brands which Colgate-Palmolive owns including oral care, personal care, home care, skin care and pet care brands.

This Statement has been published pursuant to California's Transparency in Supply Chains Act, the United Kingdom's Modern Slavery Act, Australia's Commonwealth Modern Slavery Act and the Norwegian Transparency Act. We have common policies and compliance procedures relating to human rights, decent working conditions and mitigating modern slavery risks across our businesses. However, not all of our group companies are subject to the Acts referred to above.

As used in this statement, "fundamental human rights" and "human rights" are internationally recognized human rights, including those under the United Nations Convention on Economic, Social and Cultural Rights, the United Nations Convention on Civil and Political Rights and the International Labor Organization's (ILO) core conventions. "Decent working conditions" are those that safeguard fundamental human rights and health, safety and the environment in the workplace, while providing a living wage. As used in this Statement, "modern slavery" encompasses forced labor, prison labor, indentured labor, bonded labor, debt servitude, state imposed forced labor, human trafficking, child labor and other similar conduct commonly thought of as modern slavery.

Our Organization, Business and Supply Chain

Founded in 1806, Colgate-Palmolive is a consumer products company that serves people around

the world. Colgate is a caring, innovative growth company reimagining a healthier future for people, their pets and our planet. By living our Colgate Values of Caring, Inclusive and Courageous, we create a culture in which people act as a team, working together toward common goals. Colgate's three fundamental values are part of everything we do.

Our Company operates in over 80 countries and markets its products in over 200 countries and territories. The Company has over 50 manufacturing and research facilities globally, with the vast majority of Colgate products manufactured in Colgate-owned facilities. We have a truly global supply chain that sources goods and services from over 39,000 suppliers located in over 100 countries.

Commitment to Human Rights and Decent Working Conditions

The Company cares about people: Colgate people, customers, consumers, shareholders and business partners. We are committed to acting with compassion, integrity, honesty and high ethics in all situations, to listening with respect to others, and to valuing differences. The Company is also committed to protecting the global environment, enhancing the communities where Colgate people live and work, adhering to government laws and regulations and to positively impacting the lives of workers in our supply chain.

Colgate has a long-standing commitment to respecting human rights and labor rights worldwide and supports the United Nations Universal Declaration of Human Rights and the ILO core conventions, and we have confirmed our support for the UN Global Compact and principles on human rights, labor, the environment and anti-corruption. Colgate also is a member of the Consumer Goods Forum (CGF), and participates in the Forum's Human Rights Coalition. The Company also supports the Forum's Social Resolution on Forced Labor and it's supporting Priority Industry Principles: every worker should have freedom of movement, no worker should pay for a job, and no worker should be indebted or coerced to work. Furthermore, Colgate seeks to work with business partners who share our commitment to human rights.

Our Policies

Some of our policies which address fundamental human rights, decent working conditions and our commitment to mitigate modern slavery risks are discussed below.

Employee Code of Conduct and Global Business Practices Guidelines

Since 1987, our Code of Conduct has served as a guide for our daily business interactions, reflecting our corporate values and our standards for ethical behavior. Colgate's Code of Conduct communicates our commitment to oppose all forms of unacceptable treatment of workers.

Colgate's Global Business Practices Guidelines provide further information to our employees on key topics in our Code of Conduct. The Guidelines offer clear, practical guidance and illustrate how the values and principles outlined in the Code of Conduct apply to particular business

situations.

Third Party Code of Conduct

Colgate's Third Party Code of Conduct sets the Company's expectations for suppliers and business partners in a number of critical areas, including fundamental human rights, labor practices, protecting the environment, health and safety, and ethical dealings. It is our goal to ensure that our relationships with our suppliers and business partners reflect and support the same high ethical standards that are in our employee Code of Conduct.

The Third Party Code of Conduct is provided to suppliers (including business partners), and Colgate's contracts and purchase orders typically require suppliers to abide by the Code's standards or suppliers' comparable code standards, including applicable labor and equal employment laws. Certain suppliers are also required to acknowledge the Code's requirements via our online supplier portal.

The Code states Colgate's policy not to work with any supplier or contractor known to utilize inhumane labor practices, including exploitation, physical punishment, abuse, involuntary servitude, prison labor, bonded labor, any form of human trafficking, or other forms of mistreatment.

Suppliers and business partners are expected to apply the Code across their entire operations. In the event of non-compliance, Colgate typically will work with suppliers to create a corrective action plan that includes reasonable time frames to meet our requirements. If a supplier is unable or unwilling to meet our time-bound requirements, we may elect to terminate our contract with them or not renew the contract. After remediation, our procedures contemplate ongoing monitoring and verification that our policies are being properly implemented.

Additional Policies

We have additional policies that directly or indirectly support our commitment to respect human rights and labor rights.

- Non-Retaliation Policy
- No Deforestation Policy
- Palm Oil Policy
- Responsible Soy Procurement Policy
- Conflict Minerals Policy
- Environmental, Occupational Health & Safety Policy Statement
- Colgate HIV/AIDS Policy
- Anti-Bribery Policy
- Equal Opportunity Employment Policy

Our Policies are publicly available on the Colgate website:

<https://www.colgatepalmolive.com/en-us/sustainability/our-sustainability-policies>

Human Rights Strategy

Through the development of our human rights strategy, we identified salient issues (which are stated below) and the groups most vulnerable to human rights abuses, including modern slavery. These groups include individuals working in "high risk" geographies or industry sectors, particularly where migrant or temporary workers are utilized. The salient issues below are inherent risks in the supply chains of fast moving consumer goods. Particular commodities of focus in our industries include palm oil, soy, pulp & paper and beef tallow.

We believe that the risk of adverse human rights impacts, working condition violations and modern slavery in our own business are mitigated because we are a large company with robust human resources and compliance functions, relevant policies and procedures and internal reporting mechanisms. Where risks exist, they exist principally in supply chains, we believe in many cases several tiers removed from our company. Through the policies, procedures and other efforts discussed in this Statement, we seek to mitigate adverse human rights impacts, working condition violations and modern slavery risks in our supply chains and at our business partners.

Our human rights strategy seeks to address the following salient issues:



Selected elements of our policies and strategies for addressing the foregoing issues are discussed below.

Freedom of Association

Colgate is committed to respecting employees' lawful freedom of association and recognizes all legal rights to organize and collectively bargain. Colgate seeks to work with suppliers who promote this standard.

Forced Labor

Colgate will not use forced labor within our own operations. We strive to eradicate forced labor from our value chains. We believe that every worker should have freedom of movement, no worker should pay for a job, and no worker should be indebted or coerced to work. We expect

that suppliers will not hold workers' passports, original identification documents or other valuables unless required to do so by law. We also expect that fees and costs associated with recruitment and employment be paid by the employer, not the employee. Moreover, it is Colgate's policy not to work with any supplier known to use forced labor.

Child Labor

Colgate also will not use child labor within our own operations. Child labor is defined as employing any person younger than the minimum age, as legally permitted in the jurisdiction in question. However, in no event will we knowingly employ anyone younger than sixteen (16) years of age, even if the legal working age in a jurisdiction is lower. Moreover, it is Colgate's policy not to work with any supplier known to operate with child labor.

Health and Safety

We strive to eliminate potential hazards in the workplace and to comply with all occupational health and safety regulations and our own minimum standards. Colgate respects the health and safety of our workers. Suppliers who do business with Colgate are encouraged to maintain a focus on health and safety that is consistent with ours and must provide a safe and healthy work environment for all employees working at their sites. In addition, any supplier representative providing on-site services in a Colgate facility is required to adhere to both regulations and Colgate safety standards.

Working Hours and Wages

Colgate is committed to paying employees a wage that enables them to meet at least their basic needs and complying with legally mandated work hours in accordance with local laws. Colgate expects our suppliers to comply with legally mandated wage and overtime compensation and working hour requirements in accordance with local laws.

Harassment

We prohibit sexual harassment or any form of harassment of Colgate people by any person in the workplace or while conducting company business.

Land Use Rights

Colgate respects the legal or customary land-tenure and use rights of indigenous and local communities, as well as their rights to give or withhold their free, prior and informed consent for operations affecting their land or natural resources. Colgate seeks to work with suppliers who promote this standard.

Diversity and Inclusion

Colgate strives to ensure our organization reflects the diversity of our consumers. We are committed to providing equal opportunity for all employees at all levels regardless of race, color, religion, sex, national origin, citizenship, ethnicity, age, disability, marital status, veteran status, sexual orientation, gender identity or any other characteristic protected by law in the terms or conditions of employment. This includes but is not limited to recruitment, hiring, promotion, transfer, compensation, training, demotion or layoff. Colgate seeks to work with suppliers who

promote this standard.

Key Collaborations

Eliminating adverse human rights impacts, including modern slavery in supply chains is beyond the capabilities of any single company. We therefore work extensively with other stakeholders, including governments, workers' organizations, NGOs and other stakeholders to address these issues. Examples are discussed below.

AIM-PROGRESS

We are a member of AIM-PROGRESS, a global forum of consumer goods companies sponsored by the European Brands Association (AIM) and the Consumer Brands Association (formerly GMA) in North America. The group's purpose is to promote responsible supply chain and sourcing practices covering labor and human rights, health and safety, environmental management and business integrity. Colgate actively participates in the AIM-Progress Human Rights work stream focused on the issues of forced labor, responsible recruiting and fair labor practices.

Consumer Goods Forum

Through the Consumer Goods Forum, Colgate participates in the Human Rights Coalition, Social Sustainability Committee and Palm Oil Working Group and associated task forces. Colgate also supports collaborative work commissioned through the CGF, such as, prior to the reporting year covered by this Statement, a report on assessing forced labor risks in the palm oil sector in Indonesia and Malaysia conducted by the Fair Labor Association. Insights from the report were developed into a publicly communicated high level action plan with concrete activities.

Earthworm Foundation

Colgate has a palm oil membership with The Earthworm Foundation to engage our suppliers and drive transformation within the supply chain. Our policy implementation plan activity includes understanding suppliers' progress and actions toward meeting Colgate's responsible and sustainable palm oil sourcing policy. The focus includes the suppliers' own policy commitments, traceability status, grievance process, transparency and verification activities, as well as review of supplier initiatives to identify and address human and labor rights issues.

In addition to the above collaboration efforts, Colgate supports numerous landscape and sectorial transformation projects and capacity building activities with suppliers, including child labor protection work with Business for Social Responsibility (BSR) and Wilmar International, and support of on the ground landscape projects in Indonesia, Malaysia, and Mexico focused on conservation of forests and improvement of communities and farmers livelihoods.

Due Diligence and Risk Assessment

In addition to the policies and practices discussed above, to identify, assess, mitigate and address actual and potential adverse impacts on fundamental human rights, decent working conditions issues and modern slavery risks in both our business and in our supply chains and at our business partners, among other things, we engage in risk assessments, utilize external audits and, if there is non-conformance with our requirements, require implementation of a corrective action plan. Our human rights and labor compliance initiatives are informed by and we believe consistent with the recommendations provided for in the United Nations Guiding Principles on Business and Human Rights and the Organization for Economic Co-operation and Development's Guidelines for Multinational Enterprises. Some of these activities are further discussed below.

We measure the effectiveness of our efforts by, among other things, tracking the number of suppliers that complete assessments, the number of audits performed, audit findings, the implementation of any required corrective action plans, the number and types of grievances lodged and the resolution of such grievances.

In addition, we take measures to ensure that the goods and materials we import are not produced by forced labor, consistent with applicable trade laws, including but not limited to the U.S. Tariff Act, as well as in furtherance of U.S. Customs and Border Protection's Customs Trade Partnership Against Terrorism Security and Trade Compliance programs.

Our Own Operations

We have over the last six years completed risk assessments at 100% of Colgate-Palmolive manufacturing facilities and conducted social compliance audits using the Sedex Members Ethical Trade Audit (SMETA) protocol at 100% of our manufacturing facilities operating in countries identified as high-risk according to Verisk-Maplecroft global risk indices on labor practices, human rights, worker health & safety and environmental management. Where areas of noncompliance are identified, a corrective and preventive action plan is implemented. Findings are verified as closed by third-party verification.

Our Third Party Business Partners and Supply Chain

Since the Supplier Responsible Sourcing Assessment (SRSA) program's inception in 2012, Colgate has assessed more than 80% of our spend with direct suppliers and providers in high-risk geographies, including raw material and packaging suppliers, contract manufacturers, co-packing facilities, and warehousing operations. In 2018, we expanded our risk assessment scope to include third-party labor providers.

Colgate's SRSA program requires selected suppliers and business partners to complete a self-assessment focused on human rights and labor practices, among other things. Risk factors considered in the selection of suppliers to participate in the SRSA program include: geographic risks, Colgate's in country knowledge, industry-associated risks and criticality to our operations. Through the use of a risk assessment scorecard, selected suppliers and business partners are scored against critical risk factors to determine the need to conduct a compliance audit. When a supplier is assessed as high risk, a third-party audit of their facility is required. Audits are both

announced and unannounced. In 2022, 92 suppliers completed self-assessments and 86 audits were completed.

In addition, as a member of the Supplier Ethical Data Exchange, or Sedex, Colgate employs the SMETA audit protocol to assess suppliers' compliance with laws including: employment freely chosen, regular employment, harsh or inhumane treatment, entitlement to work and emigration, freedom of association, child labor, health and safety, wages and benefits, working hours and discrimination, among other compliance practices.

If any areas of noncompliance are detected as a result of any of the foregoing, a corrective action plan is developed. We then work with the supplier or business partner to ensure the findings are remedied on the timetable established. The remediation of all areas of noncompliance is verified, independently in the case of SMETA audits. If a supplier or business partner is unable or unwilling to implement the corrective action plan, Colgate may terminate the business relationship. As applicable, we communicate with affected stakeholders on how adverse impacts are addressed.

At the end of 2022, there were approximately 700 suppliers in the Sedex program and 41% had conducted a SMETA social compliance audit. According to information made available by Sedex, the general areas of noncompliance identified during audits relate to failure to pay full wages, retention of passports, worker health and safety, working hours and management systems.

This supplier assessment program also is integrated into our supplier qualification process, which applies to the onboarding of new suppliers.

Colgate also conducts forced labor risk assessments specifically for third party labor providers in our operations. This process applies globally.

Colgate continues to evaluate opportunities to expand our human rights and labor rights risk assessment process for additional categories of vendors. For example, the Company intends to expand the scope of forced labor risk assessments into facility management service providers, as well as the producers of direct materials such as mined and agricultural products.

Providing Access to Remedy

Reporting & Remedying Grievances

The Colgate Ethics Line provides a means for employees and external parties, including suppliers, business partners, workers and members of the communities in which we and our suppliers and business partners operate, to ask questions and obtain guidance or report any suspected violations of the Code of Conduct, as well as report other human rights or labor concerns more generally. We work to create a workplace free of inappropriate or unlawful behavior in which people are encouraged to share their concerns with the Company without fear of retaliation. Consequently, no adverse action will be taken against any employee, former employee, agent or third party for complaining about, reporting, participating in or assisting in

the investigation of a suspected violation of the Company's Code of Conduct, Company policy or applicable law.

Colgate investigates all potential Code of Conduct violations, as well as other credible human rights or labor issues raised. After an investigation has been completed, if the allegations are substantiated, appropriate remedial action is taken. Additionally, through our risk assessment work with third party labor providers, we have provided an email address, [Responsible Sourcing@colpal.com](mailto:ResponsibleSourcing@colpal.com), for labor providers to respond to a recruitment and employment survey as well as to communicate any questions or raise any concerns.

Actions to Remedy

Through the SRSA program, Colgate also seeks, as part of the self-assessment and/or audit process, to identify any critical issues that would trigger the need for immediate supplier or business partner corrective action. Examples of critical social issues include child labor and forced labor, as well as locked emergency exits and other safety situations that may be immediately dangerous to worker life and health.

Training

Colgate requires that 100% of salaried and clerical employees complete Code of Conduct training each year, with all other employees completing the course every other year. Code of Conduct training also is required as part of the onboarding process. Code of Conduct training reinforces Colgate's commitment to, among other things, respecting workers' human rights and fair labor practices. Training is linked to compensation for certain employee populations. In addition to training, the Company engages key internal stakeholders and senior leadership in raising awareness of human rights and labor issues.

In addition, relevant employees receive more specialized training on human rights, labor issues and modern slavery and our related compliance policies and procedures.

Colgate also participates in supplier capacity building sessions through the AIM-PROGRESS forum that are designed to improve their social and environmental performance. The sessions explain the responsible sourcing assessment process and prepare suppliers and business partners for assessments and audits of their facilities. We have participated in events in Latin America and North America. In addition, Colgate from time to time conducts similar independent responsible sourcing training events for our suppliers and business partners.



Ann Tracy, Chief Sustainability Officer

Modern Slavery Act Approvals

Australian Commonwealth Modern Slavery Act

Hill's Pet Nutrition Pty Limited ("Hill's") and Colgate-Palmolive Pty Ltd ("C-P Pty" and, together with Hill's, the "Colgate-Palmolive Australian Entities") are required to submit a modern slavery statement pursuant to the Australian Commonwealth Modern Slavery Act. Solely for purposes of compliance with that Act, this Statement was approved by the boards of directors of each of the Colgate-Palmolive Australian Entities on June 15, 2023, and signed by the undersigned, who are directors of each such entities, on June 15, 2023. Each of Hill's and C-P Pty submits this Statement separately and independently on its own behalf. This Statement is not a joint statement.

The Colgate-Palmolive Australian Entities have operations throughout Australia and are indirectly wholly owned by Colgate-Palmolive Company. Hill's had 76 employees and C-P Pty had 297 employees as of 31 December, 2022. The Colgate-Palmolive Australian Entities do not own any other entities.

Hill's imports and sells pet food products for the Australian market. C-P Pty produces, imports and sells household cleaning and personal care products for the Australian market. Hill's does not have its own manufacturing operations and sources products from other Hill's companies or third-party manufacturers. C-P Pty has its own manufacturing operations in Australia. C-P Pty also sources products from other Colgate companies or third-party manufacturers. The Colgate-Palmolive Australian Entities generally sell the same products as are sold by Colgate in other parts of the world and have the same regional and global supply chains as other Colgate companies. Colgate's supply chain is discussed earlier in this Statement. We believe the modern slavery risk inherent in supply chains for products of the Colgate Palmolive Australian Entities is that forced labor could occur without our knowledge in violation of our policies in upper tiers of the supply chain. We seek to address this risk through the policies, procedures and other measures described earlier in this Statement.



Emma Grant, Director and General Manager Hill's Pet

Nutrition Pty Limited



Simon Petersen, Director and Vice President & General Manager

Colgate-Palmolive Pty Ltd



UK Modern Slavery Act

Hill's Pet Nutrition Limited ("Hill's") and Colgate-Palmolive (U.K.) Ltd ("C-P UK" and, together with Hill's, the "Colgate-Palmolive UK Entities") are required to prepare a modern slavery statement pursuant to the Modern Slavery Act (2015). For purposes of compliance with that Act, this Statement was approved by the board of directors of each of the Colgate-Palmolive UK Entities and signed on June 8, 2023 by the undersigned, who are directors of each such entity.

The Colgate-Palmolive UK Entities have operations throughout the UK and are indirectly wholly-owned by Colgate-Palmolive Company. Hill's had 75 employees and C-P UK had 152 employees as of 31 December, 2022. The C-P UK Entities own a number of entities in the UK and internationally.

Hill's sells pet food products in the UK market. C-P UK sells household cleaning, oral care, and personal care products in the UK market. Hill's and C-P UK do not have their own manufacturing operations and source products from other Hill's and Colgate companies or third-party manufacturers, who import the products into the UK.

The Colgate-Palmolive UK Entities generally sell the same products as are sold by Colgate in other parts of the world and have the same regional and global supply chains as other Colgate companies. Colgate's supply chain is discussed in the Colgate-Palmolive Company statement above. We believe the modern slavery risk inherent in supply chains for products of the Colgate-Palmolive UK Entities is that forced labor could occur without our knowledge in violation of our policies in upper tiers of the supply chain. We seek to address this risk through the policies, procedures and other measures described earlier in this Statement.

A handwritten signature in blue ink, appearing to read 'Taylor Gordy', written over a horizontal line.

Taylor Gordy
General Manager Colgate-Palmolive Northern Europe

A handwritten signature in blue ink, appearing to read 'Claire Towers', written over a horizontal line.

Claire Towers
General Manager Hill's Pet Nutrition UK



Norwegian Transparency Act /Åpenhetsloven

Colgate-Palmolive Norge AS er pålagt å offentliggjøre en redegjørelse for aktsomhetsvurderingene etter åpenhetsloven. For å overholde åpenhetsloven ble dette notatet godkjent av styret i Colgate-Palmolive Norge AS 6. juni 2023, og signert av styremedlemmer i denne enheten.

Colgate-Palmolive Norge AS har virksomhet i hele Norge og er indirekte heleid av Colgate-Palmolive Company. Colgate-Palmolive Norge AS har 22 ansatte per 31. desember 2022.

Colgate-Palmolive Norge AS selger rengjøring, munnpleie og personlig pleieprodukter på det norske markedet. Colgate-Palmolive Norge AS har ikke egen produksjonsvirksomhet, men selger varer produsert hos andre Colgate-selskaper eller tredjeparts produsenter.

Colgate-Palmolive Norge AS selger generelt de samme produktene som selges av Colgate i andre deler av verden, har de samme regionale og globale forsyningskjedene som andre Colgate-selskaper og er en del av Colgates globale compliance-program. I dette notatet viser Colgate-Palmolive Norge AS til: (1) retningslinjer og prosedyrer for å kartlegge og vurdere faktiske og potensielle negative konsekvenser for grunnleggende menneskerettigheter og anstendige arbeidsforhold; (2) de negative konsekvenser og betydelige risikoer for negative konsekvenser oppdaget gjennom aktsomhetsvurderingene; (3) tiltak implementert eller planlagt å bli implementert for å stanse, forebygge eller begrense negative konsekvenser; og (4) gjennomføring og resultater av de iverksatte tiltakene.

Colgate-Palmolive Norge AS is required to publish an account of due diligence pursuant to the Transparency Act. For purposes of compliance with the Transparency Act, this Statement was approved by the board of directors of Colgate-Palmolive Norge AS on June 6, 2023, and signed by the undersigned, who are directors of that entity.

Colgate-Palmolive Norge AS has operations throughout Norway and is indirectly wholly-owned by Colgate-Palmolive Company. Colgate-Palmolive Norge AS has 22 employees as of 31 December, 2022.

Colgate-Palmolive Norge AS sells household cleaning, oral care, and personal care products in the Norwegian market. Colgate-Palmolive Norge AS does not have its own manufacturing operations and source products from other Colgate companies or third-party manufacturers.

Colgate-Palmolive Norge AS generally sells the same products as are sold by Colgate in other parts of the world, has the same regional and global supply chains as other Colgate companies and is part of the global Colgate compliance program. Accordingly, the following in respect of



COLGATE-PALMOLIVE NORGE AS

Colgate-Palmolive Norge AS are discussed earlier in this Statement: (1) guidelines and procedures for addressing actual and potential adverse impacts on fundamental human rights and decent working conditions; (2) the adverse impacts and significant risks of adverse impacts discovered through due diligence; (3) measures implemented or planned to be implemented to prevent or limit the adverse impacts; and (4) the results or expected results of the implemented measures.

Trine Abildgaard Sætveit

Trine Abildgaard Sætveit (Jun 7, 2023 08:51 GMT+2)

Trine Abildgaard Sætveit (chairman)

Stephane Lionnet

Stephane Lionnet (Jun 9, 2023 10:59 GMT+2)

Stéphane Jean Yves Lionnet

Ingrid Claire Stewart

Ingrid Claire Stewart

Berit Kryger Mortensen

Berit Mortensen (Jun 9, 2023 11:03 GMT+2)

Berit Kryger Mortensen