CODE OF CONDUCT

Living Our Values

CARING • GLOBAL TEAMWORK • CONTINUOUS IMPROVEMENT

Maintaining the Highest Ethical Standards
Colgate-Palmolive Company has for over 200 years consistently demonstrated a commitment to our deeply held values and principles by conducting business with integrity and honesty, while putting our values into action by leading with respect.

I am proud to recognize the 25th anniversary of our Company's Code of Conduct. Since its launch in 1987, our Code has guided us with a set of principles that reflect Colgate's values and established standards governing our ethical behavior. To keep pace with the changes in the world and in our markets, the Code of Conduct is regularly reviewed, updated and reissued to ensure its relevancy and comprehensiveness. Events in the business world have never been more challenging or complex and they reinforce the vital importance of conducting business in an ethical, legally compliant and socially responsible manner. As a truly global company operating in numerous countries around the world, all of us must ensure that our behavior and decisions live up to our ideals and values as stated in our Code of Conduct.

Each of us makes decisions every day that may have financial, human, community or ethical implications. As a member of the Colgate family, it is important that you read, understand and fully comply with our Code of Conduct. The Code emphasizes the personal responsibility each of us has to act with integrity and maintain the highest ethical standards.

But knowing about our Code of Conduct is not enough. As Colgate people, we promote ethical behavior through our actions and our words. We take responsibility for our actions and decisions, and speak up to challenge behavior that conflicts with our Code of Conduct, as well as other Colgate policies.

Colgate's reputation is entrusted to each of us. Thank you in advance for your ongoing commitment to our shared values and your ethical leadership, which are vital to our continued business success.

Ian Cook
Chairman, President and
Chief Executive Officer
By living our Colgate values of Caring, Global Teamwork and Continuous Improvement, 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.

CARING

The Company cares about people: Colgate people, customers, shareholders, consumers, suppliers and business partners. Colgate is committed to act with compassion, integrity, honesty and high ethics in all situations, to listen with respect to others and to value differences. The Company is also committed to protect the global environment, to enhance the communities where Colgate people live and work, and to be compliant with all government laws and regulations.

GLOBAL TEAMWORK

All Colgate people are part of a global team, committed to working together across countries and throughout the world. Only by sharing ideas, technologies and talents can the Company achieve and sustain profitable growth.

CONTINUOUS IMPROVEMENT

Colgate people are committed to getting better every day in all they do, as individuals and as teams. By better understanding consumers’ and customers’ expectations and continuously working to innovate and improve products, services and processes, Colgate will "become the best."

In today’s increasingly competitive marketplace, Colgate values are the foundation for individual, team and company success. Only by respecting others and living the Colgate values can we hope to achieve outstanding business results.
"Leading with Respect" is the way Colgate people put the Company Values into action.

By Leading with Respect, we create an environment where people feel free to offer suggestions, contribute ideas and make contributions to the organization.

Leading with Respect creates an environment where people genuinely care about each other and work well together to reach their full potential.

The Leading with Respect principles are:

**Communicate**

Express ideas clearly and simply; listen to others; create an environment where people are comfortable expressing their thoughts; promote the timely and ongoing flow of information to and from others.

**Give and Seek Feedback**

Develop all Colgate people by giving and seeking constructive, specific feedback; provide direction and help people stay on track; motivate positive change and inspire exceptional work.

**Value Unique Contributions**

Value and recognize the contributions and good work of others; respect individuality; involve others when making decisions and establishing priorities. Valuing people for their individual differences is key to building and sustaining success in business now and in the future.

**Promote Teamwork**

Create a commitment to common goals; resolve conflict in a positive way.

**Set the Example**

Set a positive example for conducting business in an ethical manner, for managing stress, and for creating a pleasant and balanced work environment.
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ABOUT THE CODE OF CONDUCT

Our Colgate Code of Conduct serves as a guide for our daily business interactions, reflecting our standard for appropriate behavior and our corporate values. The Code clearly conveys to each of us that the manner in which we achieve our business results matters just as much as achieving them. The Colgate Code of Conduct applies to all Colgate people, including directors, officers and all employees of the Company and its subsidiaries around the globe. Vendors and suppliers are also subject to these requirements, as adherence to the Code is a condition for conducting business with Colgate.

Most importantly, each employee is responsible for demonstrating integrity and leadership by complying with the provisions of the Code of Conduct, Global Business Practices Guidelines, Company policies and all applicable laws. By fully including ethics and integrity in our ongoing business relationships and decision-making, we demonstrate a commitment to a culture that promotes the highest ethical standards.

Complying with the Code is easiest to ensure by using good judgment and seeking guidance when questions arise. Each of us is responsible for our decision-making and for our compliance with the Code. If you are uncertain, before you proceed with a specific action, ask yourself the following:

- Am I authorized to do this?
- Am I setting the example?
- Is the action the right thing to do?
- Is the action legal and consistent with Colgate’s Values, Leading with Respect principles, the Code of Conduct, the Company’s Business Practices Guidelines and other policies?
- Would I be proud to report this action to someone I respect?
- Will the action further enhance Colgate’s reputation as an ethical Company?
- Am I demonstrating the highest ethical standards?

If the answer to any of these questions is NO or if you have any questions or concerns about interpreting or applying the Code of Conduct or any related Colgate standard, policy or procedure, you should discuss the situation with your manager, Human Resources, the Global Legal Organization or Global Ethics and Compliance.

No adverse action will be taken against anyone for complaining about, reporting, or participating or assisting in the investigation of a suspected violation of the Code of Conduct, unless the allegation made or information provided is found to be intentionally false. To the maximum extent possible, Colgate will maintain the confidentiality of all complaints.

The Code is available online and has been translated into several different local languages. Colgate requires that all Colgate people read, understand and comply with the Code. However, compliance does not just happen. It requires a commitment from each of us. To reinforce this commitment, Code training and certification are offered to Colgate people around the globe on an annual basis.
Our dealings with each other should be based on mutual trust and dedication. We are responsible for treating each other with respect and dignity.

**WE STRIVE TO HAVE SUCCESSFUL WORKING RELATIONSHIPS.**

At Colgate, we take pride in the strong personal commitment of our people and the excellent achievements that result from that commitment. But this level of commitment can only be achieved in a climate of trust, open and honest communication, and respect. All of your dealings with your peers, your direct reports and your supervisors should be conducted as a partnership, in which each individual’s behavior is governed by an overriding commitment to maintaining the highest ethical standards.

Your relationship with those you work with should be as a member of a winning team. People working in harmony and focused on a set of mutual objectives are the driving momentum behind our business. For this dynamic team relationship to work, each individual must fulfill his or her responsibilities and feel assured that others will do the same. This means providing the necessary support to others, at every level, to get the job done. No individual or business unit can place its own priorities before those of the Company’s.

Your relationship with those you work with or supervise should promote ethics and compliance by setting an example of decency, fairness and integrity. As a leader, you are responsible for clearly defining standards of performance and creating an environment that promotes teamwork and ethical behavior.

**WE PROMOTE OPEN AND HONEST COMMUNICATIONS.**

Encourage creative and innovative thinking, and if you are a supervisor, treat subordinates as individuals, providing them the freedom necessary to do their jobs. Provide suggestions for performance improvement.

Your relationship with your supervisor should be one of mutual respect and trust. You and your supervisor are a team with the shared purpose of achieving the goals set for your unit by the Company. You are as responsible as your supervisor for ensuring that the communication between you is open and honest. Take the initiative as often as you can. Be innovative in solving problems. Your cooperation and creativity are essential to achieving the goals of your unit and the Company.

**WE VALUE COLGATE PEOPLE AS OUR GREATEST RESOURCE.**

Colgate’s commitment to caring for people is manifested in the workplace through a variety of programs designed to promote and reward individual and team achievement. You are encouraged to advance as far as you can and to make a meaningful contribution to the success of the Company. In the end, it is the efforts of our talented and skilled people all over the world that make the success of our business possible. Specifically, in matters of employment:

- It is the policy, practice and desire of Colgate to provide employment opportunities to all qualified persons on an equal basis. The Company will not discriminate against any employee or applicant for
employment because of race, color, religion, sex, gender identity, national origin, ethnicity, age, sexual orientation, disability, marital status, veteran status or any other characteristic protected by law in any of the terms or conditions of employment. This includes, but is not limited to, recruitment, hiring, promotion, transfer, compensation, training, demotion or layoff.

- We do not use child labor. Child labor is defined as employing any person younger than the minimum age allowed by law in the jurisdiction in question. However, in no event will we knowingly employ anyone younger than sixteen (16) years of age.

- We maintain an inclusive work environment and achieve excellence by attracting and retaining people of all backgrounds in our workforce.

- We provide training, education and promotional opportunities that permit development and career advancement for all Colgate people.

- We conduct performance appraisals that provide candid and accurate feedback. This process encourages two-way comments and discussion, and review of appraisals by higher levels of management.

- We pay for performance and recognize and reward contributions by individuals and teams that exceed their normal job duties through programs such as the Chairman’s You Can Make a Difference Award Program.

- We prohibit sexual or any other kind of harassment of Colgate people by any person in the workplace or while conducting Company business.

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Q: *One of my co-workers e-mailed an inappropriate joke to me and some other colleagues. I found it offensive, but don't know if I should approach my co-worker with my concern.*

A: *At Colgate-Palmolive, we are committed to maintaining a professional work environment in which all Colgate people are treated with respect and dignity. Therefore, offensive or inappropriate behavior is not acceptable. If you feel uncomfortable speaking with your co-worker directly, please contact your Manager, Human Resources or Global Ethics and Compliance for assistance.*

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- We strive to avoid favoritism or the appearance of favoritism in the workplace in accordance with the policies and procedures adopted by the Company.

- We strive to eliminate potential hazards from the workplace and to comply with all applicable occupational safety and health laws and standards.

- We help maintain a safe, healthy and productive work environment, for all Colgate people and others, by:
  - prohibiting the possession, use, sale or transfer of illegal drugs or drug paraphernalia on Company property or time;
  - prohibiting the conduct of Company business while under the influence of alcohol;
  - prohibiting the possession or use of weapons/firearms or ammunition on Company premises or while conducting Colgate business, subject to local law. Possession of a weapon can be authorized for security personnel when this possession is determined necessary to secure the safety and security of Company employees;
  - prohibiting any acts that could be perceived as violent, threatening, degrading or intimidating, and
  - requiring that any instance of drug or alcohol abuse, violence or unlawful weapons possession be reported to management immediately.
As Colgate people, we strive to adhere to Colgate’s policies, while making our best efforts to improve the Company’s performance. We recognize the trust and confidence placed in us and act with integrity and honesty in all situations to preserve that trust and confidence. We avoid conflicts of interest and other situations that are potentially harmful to the Company.

WE AVOID CONFLICTS OF INTEREST.

Your judgment is one of your most valuable assets. You should avoid any activity, interest or association that conflicts with or appears to compromise your exercise of independent judgment in the Company’s best interests. Conflicts can arise in many situations. It is impossible to cover them all here, and it will not always be easy to distinguish between proper and improper activity. When in doubt, consult your manager, Human Resources or the Global Legal Organization before taking any action. The following guidelines apply to the most common conflict situations:

Investments

Do not make any investment that might affect your business decisions. Company policy prohibits Colgate people from owning stock or having a proprietary interest in a company competing with or doing business with Colgate. This prohibition does not apply to owning small amounts (generally under 1%) of stock of a publicly traded company, provided that the investment is not so financially substantial that it creates the appearance of a conflict of interest. If you made potentially prohibited investments before joining Colgate, report the facts to the Global Legal Organization.

Family

Notify your manager and obtain approval from your Division or Function head and the Global Legal Organization before doing business on Colgate’s behalf with any company in which you or a close family member has an interest such that you may in any way benefit from your or their actions.

Other Work

Do not work for a competitor of Colgate’s while working for Colgate or do any work for or provide assistance to any third party (distributor, customer or supplier) that may adversely affect your performance or judgment on the job. Do not use Company time, facilities, materials, brands or logos for outside work that is not related to your job at Colgate without authorization from your Division or Function head.

Personal

While we recognize and respect the rights of Colgate people to freely associate with those they encounter in the work environment, we must also use good judgment to ensure that those relationships do not negatively impact job performance, the ability to supervise others or the work environment.

Any workplace conduct arising from a romantic relationship or friendship between employees may be
improper if the conduct creates an uncomfortable work environment for others. Favoritism or making business decisions based on emotions, allegiances or friendships rather than the best interests of the Company is prohibited. Individuals who find themselves in a personal relationship or friendship should use tact, good judgment and sensitivity.

Be conscious of the fact that another member of your household might be employed in a capacity that could create or appear to create a conflict of interest. If this situation arises, consult your manager, Human Resources or the Global Legal Organization for guidance.

**Boards**

Obtain approval from the CEO and Chief Legal Officer/General Counsel before agreeing to serve on a Board of Directors or a similar body for an outside business or government agency. Serving on the Board of Directors for a professional or work-related nonprofit organization must be approved in advance by your Division or Function head.

**Other Considerations**

We strive to maintain a positive work environment that reflects our Company’s values and promotes strong working relationships. While conflicts of interest often arise from our dealings with external parties, conflicts or the appearance of a conflict may also result from internal interactions. Those of us who manage others must remain particularly vigilant to ensure that situations are not created that could appear to others as favoritism or a potential conflict of interest.

If you find yourself in an actual or potential conflict of interest situation, you must immediately report it to your manager so that the situation can be properly reviewed and assessed. The Company will work with you to address the situation and identify an appropriate solution.

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**Q:** I recently obtained my manager’s approval to take on a second job selling real estate to supplement my income. May I use my desk phone to contact my clients or use the copy machine to make copies of information on property listings during work hours?

**A:** No. Your intended use of Company property is strictly for your personal benefit, is not related to the conduct of Company business, and may be perceived as interfering with your ability to perform your work-related responsibilities. While intermittent personal use of Company property is permitted, it must be limited and not interfere with the performance of your work-related responsibilities.

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**WE PROTECT THE COMPANY’S TRADE SECRET AND CONFIDENTIAL INFORMATION.**

Colgate’s trade secrets, other confidential information and much of its internal data are valuable assets. Protection of these assets, including maintaining their secrecy, plays a vital role in our continued growth and ability to compete. A trade secret is information used in connection with Colgate’s business that is not generally known or easily discovered, and for which efforts have been made to maintain its secrecy. However, other confidential information has to be protected as well.

Colgate’s trade secrets and other confidential information may consist of any formula, design, device or information that is used in our business and that gives Colgate an opportunity to obtain an advantage over our competitors. Colgate’s trade secrets and other confidential information are not always of a technical nature. They can also include business research, new product plans, strategic objectives, any type of marketing or sales material or information, any unpublished financial or pricing information, employee, customer and vendor lists, and information regarding customer requirements, preferences, business habits and plans. While not complete, this list suggests the wide variety of information that needs to be
safeguarded. Trade secrets and other confidential information need not be patentable, but cannot be publicly known.

Your obligations with respect to Colgate’s trade secrets and other confidential information are:

- Not to disclose this information to other Colgate people or third parties except on a “need to know” or “need to use” basis and, in those instances, with confidentiality designations and other data protection mechanisms such as password protection or encryption, as appropriate; and not to otherwise disclose this information.
- Not to engage third parties to handle this information without an appropriate review of the security and information technology controls of the third party.
- Not to post or discuss this information on publicly available websites or social media sites.
- Not to use this information for your own benefit or the unauthorized benefit of persons outside of Colgate.
- To take all other reasonable measures to protect Colgate’s trade secrets and confidential information in accordance with the Company’s Business Practices Guidelines.

If you leave Colgate, your obligation to protect Colgate’s trade secrets and other confidential information continues until the information becomes publicly available or Colgate no longer considers it a trade secret or confidential. You should also remember that correspondence, printed matter, electronic information, documents or records of any kind, specific process knowledge, procedures, special Colgate ways of doing things — whether confidential or not — are all the property of the Company and must remain at Colgate. Of course, personal skills acquired or improved on the job are the personal assets of the person who leaves. If you have a question as to whether information is confidential or is a trade secret, you should contact the Global Legal Organization.

WE PROTECT PERSONAL DATA

We respect the personal privacy rights of our employees, consumers, customers, suppliers and other individuals with whom Colgate has a business relationship. It is Colgate’s policy to collect, process, use and retain personal information from employees, consumers, customers, suppliers, and other individuals only as necessary and in compliance with the laws of the countries in which we do business, including laws relating to the collection and use of personal information from minors, and to take all reasonable steps to safeguard such information.

As part of their employment with Colgate, employees may provide certain personal information to the Company, such as home and e-mail addresses, family information for benefits purposes, and other personal information. We use such information only for the reasons it was supplied to us, unless an employee consents to other uses, and as necessary for business purposes and consistent with local laws.

Similarly, consumers in interactions with Colgate, through requests for product information or participation in Company-sponsored competitions, for example, may provide personal information, such as names, street addresses and e-mail addresses, to the Company. We use such information only for the reasons it was supplied to us, unless a consumer consents to other uses, and as necessary for our recordkeeping purposes. It is our policy not to share consumers’ personal information with third parties, unless required to provide services to our consumers and in compliance with applicable laws and regulations.

During the course of business relationships with Colgate, customers, suppliers and other individuals may provide personal information, such as names, telephone numbers, fax numbers, street addresses, e-mail addresses, to the Company. We use such information only for the reason it was supplied to us and as necessary for our recordkeeping purposes. It is our policy not to share customers’, suppliers’ and
other individuals’ personal information with third parties, unless required in the context of the business relationship and in compliance with applicable laws and regulations.

Laws regarding consumer privacy are frequently being developed and modified. We are committed to monitoring evolving privacy laws and standards and may, from time to time, develop specific policies in light of them. For further information regarding the protection of personal data, please contact the Global Legal Organization.

**WE ADHERE TO PRESS AND MEDIA REQUEST POLICIES.**

Requests for Colgate’s financial or business information from the media, press, financial community or the public must be referred to the Vice President, Corporate Communications, or the Vice President, Investor Relations. Requests for information or other contacts from the Securities and Exchange Commission, the New York Stock Exchange or other regulators and authorities around the world must be referred to the Global Legal Organization. It is critical that no employee respond to any such inquiry or contact themselves, because any inappropriate or inaccurate response, even a denial or disclaimer of information, may result in adverse publicity and could otherwise seriously affect the Company’s legal position.

This policy does not apply to requests for publicly available financial information, such as Annual and Quarterly Reports, or promotional publicity activities of the Company.

Requests for interviews with any Colgate individual relating to the Company or its affairs and/or the issuance of any Company press releases and/or statements must be reviewed and approved in advance by the Vice President, Corporate Communications, or the Vice President, Investor Relations. Company-initiated interviews similarly must be approved before they may be scheduled with the media.

For further information regarding the Company’s guidelines for maintaining confidential information, please refer to the “Colgate-Palmolive Guidelines on Securities Trading and Confidentiality of Information” and the “Colgate-Palmolive Guidelines on Preserving Company Proprietary Information and Respecting the Proprietary Information of Others,” which are found in the Company’s Business Practices Guidelines.

**WE MAINTAIN RELIABLE RECORDS AND REPORTS.**

The financial position of our Company and the results of its operations must be recorded in accordance with the requirements of law and generally accepted accounting principles (GAAP). Company policy, as well as the law, requires Colgate to maintain books, records and accounts that accurately and fairly reflect the nature of the business transactions and the disposition of assets of the Company.

The integrity of the Company’s accounting and financial records is based on the accuracy and completeness of the basic information supporting entries to the Company’s books and accounts. Everyone involved in creating, processing and recording such information is held responsible for its integrity. Every accounting or financial entry should reflect exactly what is described by the supporting information. There must be no concealment of information from (or by) management, or from the Company’s internal or independent auditors.

No payment on behalf of the Company shall be approved or made with the intention or understanding that any part of such payment is to be used for any purpose other than that described by the documents supporting the payment. No false or misleading entries should be made in any books or records of the Company for any reason, and no fund, asset or account of the Company may be established, acquired or maintained for any purpose unless such fund, asset or account is properly reflected in the books and records of the Company. No corporate funds or assets should be used for any unlawful or improper purpose.
Managers and others responsible for the preparation of financial information should ensure that Colgate’s corporate financial policies are followed. Revenue and expenses should be properly recognized on a timely basis.

Assets and liabilities should be properly recorded and appropriately valued. In addition, those who are responsible for or involved in the preparation of Colgate’s filings with the Securities and Exchange Commission and other filings required by applicable law, or other communications with the business or financial community, should ensure that those filings and communications contain disclosure that is full, fair, accurate, timely and understandable. If you become aware of a possible omission, falsification or inaccuracy in accounting or financial entries, in basic data supporting such entries, or in Colgate’s Securities and Exchange Commission reports or other communications, or any breakdown in internal controls, you must promptly report such information to your manager or the Global Legal Organization. You may also contact the Company’s Global Ethics and Compliance department concerning these matters on an anonymous and confidential basis.

**WE PROTECT COLGATE’S ASSETS.**

Company assets, facilities or services must be used only for lawful, proper and authorized purposes. The theft of money, property or services is strictly prohibited. Colgate equipment, systems, facilities, corporate credit cards and supplies must be used only for conducting Colgate business or for purposes authorized by management. You are personally responsible not only for protecting Colgate property entrusted to you, but also for helping to protect the Company’s assets in general. You should be alert to any situations or incidents that could lead to the loss, misuse or theft of Company property and you must report all such situations to your manager or the Corporate Security Department as soon as they come to your attention.

Only certain officers and other senior employees have the authority to make commitments affecting the Company’s assets. You should not make commitments affecting Company assets unless properly authorized. If you need to clarify your or another individual’s authority to commit the Company, you should contact your unit or Division financial director.

**WE USE INFORMATION TECHNOLOGY RESOURCES AND SOCIAL MEDIA RESPONSIBLY.**

We must use Colgate’s Information Technology Resources and Social Media responsibly and in a manner consistent with the Code and all other Company Guidelines, including the Company’s Business Practices Guidelines and/or Guidelines on Using Information Technology Resources and Social Media.

Colgate’s Information Technology Resources include all current and future equipment, software and services that gather, store, communicate and process data that is owned, leased or provided by Colgate.

In addition, Colgate’s Information Technology Resources include an employee’s or third party’s personal hardware, software or services to the extent that they are used to access or interact with Colgate’s Information Technology Resources.
Colgate's Information Technology Resources, as well as Social Media, should be used in a respectful, professional manner for Colgate business purposes except for limited and appropriate personal purposes. In addition, the following uses are prohibited:

- Harassing, discriminating, offensive, defamatory, fraudulent or threatening messages, including those that offensively address race, religion, national origin, ethnicity, color, sex, gender identity, age, citizenship, veteran status, marital status, disability or any other characteristic protected by law.
- Unauthorized distribution of Colgate confidential or trade secret information or unauthorized discussions of Company business or internal processes on any external site.
- Causing or permitting security breaches or disruptions of network communication, and/or improperly revealing your user ID or password to others or allowing others to use your user ID or password.
- Any other use prohibited by the Company's Business Practices Guidelines or Guidelines on Using Information Technology Resources and Social Media.

Except as limited by applicable laws, Colgate reserves the right to monitor, access and review all Company Information Technology Resources in appropriate circumstances at the Company's discretion and pursuant to applicable laws. The Company’s right to monitor, access and review all Company Information Technology Resources extends to business as well as personal information created, stored or transmitted using Company Information Technology Resources, and also includes Social Media sites visited via Company Information Technology Resources. Employees should have no expectation of privacy with respect to such business or personal information.

Colgate reserves the right to restrict or terminate any user’s access to or use of Colgate's Information Technology Resources at any time, for any reason, with or without advance notice, except where prohibited by law.

Q: I often visit blog sites when relaxing at home, and last week, I noticed comments from a former employee describing his experience with our Company in a very negative manner. This upset me very much. May I respond to these comments?
A: You may not respond to comments on behalf of the Company. However, you are free to respond on a personal basis, as long as you are not violating the Company’s guidelines on using Information Technology Resources and Social Media and are not disclosing the Company's confidential or proprietary information. You are also strongly encouraged to bring this matter to the attention of your manager or Human Resources.

Q: My daughter and I sometimes use my Company laptop to access the Internet. She recently asked if she and a friend can use my computer while I am out of town this weekend. Is it okay to give them my log-on and password?
A: No. Log-ons and passwords help to keep our Information Technology Resources secure. You should not disclose this information to anyone. Also, it is not advisable to tape log-ons or passwords to your computer or keep them in your computer bag. In addition, you can better protect Company data from unauthorized users by changing your passwords periodically. Moreover, family members should not be using your Company laptop for personal use.
We are fortunate to have a group of outstanding individuals serving on the Company’s Board of Directors, providing advice, guidance and leadership that is vital to our continuing success. With their collective background in business, education and public service, international experience, educational achievement, moral and ethical character, and diversity, our Board of Directors provides effective oversight of the Company’s business.

WE HAVE A BOARD OF DIRECTORS THAT IS INDEPENDENT, EXPERIENCED AND DIVERSE.

Independence promotes integrity and accountability. It is Colgate’s policy to have a Board of Directors comprised primarily of outside independent directors. All directors who serve on the committees of the Board that oversee audit, compensation and governance matters are independent. There are no interlocking directorships, and it is the Company’s policy that none of the independent directors receive any consulting, legal or any other non-director fees from the Company.

WE PROMOTE DIRECT AND OPEN COMMUNICATION WITH THE BOARD.

Both inside and outside the boardroom, Colgate’s directors have frequent and direct contact with the Company’s management. Key senior managers regularly join the directors during Board meetings and more informal sessions, and together they actively participate in candid discussions of various business issues. Between scheduled board meetings, directors are invited to, and often do, contact senior managers with questions and suggestions. The resulting atmosphere of openness and candor reflects Colgate’s overall corporate culture and helps the Board play an active role in the development and guidance of the Company’s business strategy.

WE ARE COMMITTED TO EXCELLENT CORPORATE GOVERNANCE.

Colgate’s Board has been a leader in supporting corporate governance initiatives. One of the first among its peers to formally adopt a code of conduct governing all business dealings and to develop charters for the Board and its committees, Colgate has put in place excellent corporate governance practices over the last two decades, which are continuously improved and refined. Colgate’s Board is at the center of these policies and believes strongly that good corporate governance inspires and greatly aids our long-term business success.

For a more detailed discussion of Colgate’s corporate governance program, please see the “Colgate-Palmolive Company Board Guidelines on Significant Corporate Governance Issues,” which are available on the Company’s website.
Each of us is responsible for how we are perceived by suppliers and customers. It is essential that we maintain our reputation for honesty and fair dealing with these groups.

**WE DEAL ETHICALLY WITH SUPPLIERS AND CUSTOMERS.**

Our aim in conducting our purchasing operations is to ensure continuing, reliable sources of supply. Honest dealing with customers and suppliers is essential to sound, lasting relationships. Thus, we view our suppliers as partners and expect them to make a reasonable profit. We give all potential suppliers fair and uniform consideration. Decisions are based on objective criteria such as price and quality, as well as a vendor's reliability and integrity. Giving or receiving any kickbacks, bribes or similar payments of any sort is prohibited.

We extend no personal favors to customers on prices, promotional allowances, marketing assistance or the like; we treat all customers on the same business basis. Dealings with customers and suppliers are discussed in the section of this Code addressing our responsibilities under the competition/antitrust laws.

The Colgate Supplier Code of Conduct is available in several languages on the Company's website under the “Work With Us” section for Suppliers.

**WE DO NOT GIVE OR ACCEPT INAPPROPRIATE GIFTS.**

It is unacceptable to give or receive gifts, payments or other personal benefits to influence, or that may appear to influence, any business decision. If you intend to give or receive a gift, payment or other benefit that is more than nominal in value ($50 USD), you must contact the Global Legal Organization or Global Ethics and Compliance for approval before doing so. Also, keep in mind that you may only accept a gift of nominal value from a single source one time per calendar year. If it would be embarrassing to the Company for you not to accept a particular gift that may exceed a nominal value, then your acceptance of the gift should be reported to the Global Legal Organization which will assist in determining proper disposition. In addition, do not arrange for or accept a gift, payment or other benefit that is more than nominal in value on behalf of a close family member from anyone with whom the Company has an existing business relationship or would like to establish a business relationship. Follow this rule: never accept a gift or service if it will compromise you or could appear to compromise you. This does not include occasional business entertainment, which can be reciprocated, or gifts of purely nominal value.

You should be aware that there are special rules governing appropriate conduct in dealing with federal, state, local or foreign governments that differ from rules for dealings with nongovernmental companies. In general, you may not offer or provide government employees with any gift, gratuity or thing of value, including meals or travel, unless pre-approved by the Global Legal Organization.

Colgate suppliers and vendors should always be advised of the requirement to adhere to the Code when working with us or face the possibility of losing our business for failure to do so. In addition, we should respect and adhere to customer or supplier policies to the extent that they don’t contradict our own policies.
WE RESPECT THE TRADE SECRETS AND CONFIDENTIAL INFORMATION OF OTHERS.

It is Colgate’s policy not to knowingly infringe upon the valid and enforceable intellectual property rights of others. It is also Company policy to respect the trade secrets or other proprietary information of others. This is particularly important if you have knowledge of trade secrets and proprietary information of a former employer. If any questions should arise in this area, you should consult the Global Legal Organization.

If anyone outside of the Company approaches you with an invention, discovery or idea, it is important to protect the Company against future infringement or monetary claims, especially in cases where our own efforts or those of our consultants have previously arrived at the same invention, discovery or idea, which we wish to apply to a Company product. Do not permit outsiders to reveal any details of their invention, discovery or new idea. Refer all unsolicited ideas, without reviewing them, to the Consumer Affairs department in your location for handling in accordance with the Company’s procedures.

For further information about the protection of the information of others, please refer to the "Colgate-Palmolive Guidelines on Preserving Company Proprietary Information and Respecting the Proprietary Information of Others", which are found in the Company’s Business Practices Guidelines.

Q: As part of my job, I make arrangements for numerous business meetings, trips and conventions. Now, a local hotel where I often book rooms has offered me a free weekend for my wedding anniversary. It’s a very thoughtful gesture. May I accept?
A: No. Accepting the offer would make it difficult for you to appear impartial when you arrange future hotel accommodations. Even the appearance of such a conflict of interest is inappropriate and should be avoided by politely declining the offer.

Q: I recently left a competitor company and joined Colgate. I thought it might be helpful to my new team for me to draft a summary document outlining everything I can recall about my former employer’s business plans and strategies. Is this the right thing to do?
A: It would be highly unethical, and possibly unlawful, for you to share the confidential or proprietary information of your former employer. You should not divulge any non-public information you were privy to while working for a competitor, and if you are ever asked to do so, you should immediately report the situation to either the next level of management, Human Resources, the Global Legal Organization or Global Ethics and Compliance.
Our reputation has been built upon the quality and safety of our products. Our commitment to quality and safety is essential to the continued growth and success of our Company.

**WE SET THE HIGHEST STANDARDS FOR OUR PRODUCTS.**

We are committed to ensuring that consumers can trust Colgate products for their reliability, quality and outstanding performance. In addition to serving the billions of people in the markets where we do business, we must constantly strive to produce our products in the most efficient way possible so that they are affordable to the greatest number of consumers.

Products sold by Colgate must not only meet all safety standards set by law, but also our often more stringent Company standards. We participate in programs to provide prompt assistance to consumers in the case of suspected product tampering, misuse or counterfeit. Consumer health, safety and well-being are of paramount concern to us, and as a Colgate employee it is your responsibility to immediately report any issues you encounter related to product quality or safety to your business unit leader.

**WE ARE RESPONSIVE TO CONSUMERS.**

Since our business is consumer products, our success depends upon consumer satisfaction, trust and goodwill. We can best achieve our objectives and serve the needs of consumers by following a consistent, fair and sensitive program of consumer communication.

We recognize the importance of anticipating and assuring responsiveness to consumer needs and preferences in our products. We also believe that consumer opinions, concerns and inquiries communicated to the Company regarding our products are important sources of information. Consumer needs are constantly changing, so we must continually listen to what people want and use our creativity to satisfy these changing needs.

When a consumer expresses dissatisfaction, we address the problem promptly, courteously and fairly, and make every reasonable effort to sustain or regain the consumer’s goodwill and continued purchase of Colgate products.

**OUR ADVERTISING IS ACCURATE.**

One of the most important aspects of our business is advertising. Advertising should be creative and competitive, but at the same time honest and accurate, not misleading, and always in compliance with applicable law. Our advertising must also avoid any stereotyping of individuals based on factors such as race, religion, national origin, ethnicity, color, sex, gender identity, age, citizenship, sexual orientation, veteran status, marital status, disability or any other characteristic protected by law. Advertising creates more than a product image. It builds our reputation for reliability, dependability and trustworthiness.
In addition, we exercise care in the selection of the media in which our advertising messages appear. We do not permit our advertisements to appear on television programs or in other media that make gratuitous or excessive use of violence or sex or are antisocial or adversely affect our Company reputation or products.

We observe standards of commercial fairness in devising, using and selecting advertising, trademarks and designs so that our products succeed on the strength of their own quality and our reputation, rather than by imitation or trading on the goodwill of competitors. Commercial fairness requires:

- Strict adherence to local legal requirements concerning trademark infringement and unfair competition.
- Avoiding copying of well-known trademarks, slogans, advertising themes and graphics used by multinational companies and regional competitors outside of your locality.

For a more detailed discussion of the Company’s advertising guidelines, see the “Colgate-Palmolive Advertising Guidelines” and the “Colgate-Palmolive Advertising Placement Policy Statement,” which are found in the Company’s Business Practices Guidelines.
We obey all laws that regulate Colgate’s business. It is our policy to go beyond the letter of the law and comply with its spirit. Always consult the Global Legal Organization whenever you are in doubt.

WE COMPLY WITH COMPETITION/ANTITRUST LAWS.

It is Colgate’s policy that all employees comply fully with competition laws (known as antitrust laws in the U.S.) of every country, state and locality where Colgate does business. The purpose of competition laws is to protect the competitive process to benefit consumers. Competition laws ensure that companies compete to get business by offering lower prices, innovative products and better service and not by interfering with the market forces of supply and demand. Competition laws also protect companies from predatory or unfair acts by dominant companies so that the competitive playing field is open and fair to all. Colgate supports the goals of competition laws. We believe that our Company performs best in a competitive marketplace.

Virtually every country has enacted competition laws. It is our responsibility to understand the laws where we are doing business and seek guidance from the business unit’s legal counsel or the Global Legal Organization as needed. We must adhere to the letter and spirit of the applicable laws.

Competition laws throughout the world prohibit agreements among existing or potential competitors that harm competition. The key to compliance is independence. Colgate must act independently in its business activities: setting prices, discounts, promotions, and terms of purchase and sale; selecting customers, distributors and suppliers; and choosing the products to produce and how much to sell. It is important to remember that an illegal agreement does not have to be a formal document or even in writing. It may be a verbal agreement or inferred from a course of business conduct or comments in documents. An agreement also does not have to be successfully implemented to be illegal.

Competition laws also impose certain limitations on relationships with customers and distributors. In most countries, any attempt to deprive customers or distributors of their freedom to determine prices, terms and conditions of sale, or to place undue limitations on their right to operate independently violates the competition laws.

The consequences for Colgate and its people for not complying with competition laws are extremely serious. Violation of some competition laws can lead to fines and imprisonment for the individuals involved and to even heavier fines for the Company. Moreover, even in the absence of a criminal prosecution, civil lawsuits may be brought to recover damages and attorneys’ fees.

Whenever you have any doubt as to whether a contemplated action may raise issues under competition laws, you should consult the Global Legal Organization.

For further information about competition/antitrust issues, please refer to the “Colgate-Palmolive International Competition Guidelines”, which are found in the Company’s Business Practices Guidelines.
WE COMPLY WITH SECURITIES LAWS.

On occasion you may have information about Colgate or other publicly-traded companies with which Colgate does business or is negotiating that is not known to the public (“non-public”) — such as financial or operating results, possible acquisitions, divestments or financings, marketing plans or new product introductions.

Information is considered to be non-public until it has been adequately disclosed to the public, i.e., the information has been broadly disseminated and adequate time has passed for the securities markets to digest the information. If this non-public information could be considered “material” — that is, information a prudent investor would take into account when making an investment decision — then under the applicable securities laws and Company policy:

- You must not trade for your own account or for the account of another person in stocks, bonds or other securities of the firm (Colgate or other) to which the material non-public information relates.
- You must not encourage or induce others, on the basis of such non-public information, to deal in stocks, bonds or other securities of such firms.
- You must not disclose such non-public information to persons outside Colgate.
- You must not discuss such non-public information with persons inside Colgate unless they have a need to know such information.

Colgate people with knowledge of non-public information about Colgate should exercise extreme diligence to maintain it in confidence and must not trade in Colgate stock, bonds or other securities, or the stock, bonds or other securities of any other company involved before the non-public information is announced to the public and for a reasonable period of time thereafter. Such prohibition also extends to the exercise of stock options and decisions to invest in or dispose of Colgate stock in the Company’s benefits plans.

If you leave Colgate, your obligation to maintain the confidentiality of such non-public information continues until that information has been adequately disclosed to the public.

If you have a question about whether information is “material” or has been adequately disclosed to the public, you must contact the Global Legal Organization and abstain from trading in the affected securities or disclosing the information until you have been informed that the information is not material or has been publicly disclosed and digested.
WE DO NOT MAKE POLITICAL CONTRIBUTIONS.

No funds or assets of the Company may be used for contributions to any political party or candidate, whether federal, state or local, in the United States or abroad. A political contribution includes both direct (i.e., money) and in-kind contributions. In-kind contributions include the purchase of fundraising tickets, contribution of products, volunteer work by Colgate people within normal business hours and the use of Colgate facilities for fundraising or political purposes. If you have a question regarding an in-kind contribution, please contact the Global Legal Organization.

The Company is prohibited from compensating or reimbursing any Colgate person or individual associated with the Company (including outside lobbyists), directly or indirectly, in any form, for political contributions that the person intends to make or has made.

Individual Colgate people remain free to make personal contributions to candidates or parties of their choice. A personal contribution is the responsibility and burden of the individual person. Colgate will accept no responsibility for or obligation with respect to a personal contribution. Further, a personal contribution shall not be made with the intention of assisting Colgate or one of its operating companies in obtaining or retaining business.

Like most multinational companies, Colgate belongs and pays annual dues to a number of trade and industry associations in the United States. To help ensure that these trade associations do not use any portion of the dues paid by Colgate for political contributions, Colgate's Chief Ethics and Compliance Officer annually informs the U.S. trade associations of our policy prohibiting such contributions and requires each trade association to participate in an annual certification process. To learn more, please refer to our political contributions policy, which can be found in the Governance section of the www.ColgatePalmolive.com website.

WE DEAL ETHICALLY WITH OTHERS.

It is the Company’s policy that Colgate people must comply fully with all applicable anti-bribery laws worldwide and must not engage in any acts of bribery. Therefore, you should not seek to influence the judgment or conduct of any external party with whom you might be conducting Company business by promises of gifts or other benefits, or by any other unlawful inducement.

In addition, certain lobbying laws may require the Company and/or its people to register and report as a lobbyist if a Colgate person communicates with a government employee for the purpose of influencing legislation or certain other official actions. If you are engaging in any such activity, you must notify the Global Legal Organization.

Colgate’s commitment to dealing legally and ethically with governments applies worldwide. Company policy, the U.S. Foreign Corrupt Practices Act and similar anti-bribery laws around the world prohibit our people or their agents from giving or offering to give money or anything of value — whether in cash or not, or whether directly or indirectly through others — to any foreign official (i.e., foreign government employee, foreign political party, or party official or candidate for foreign political office) to induce that official to affect any governmental act or decision, or to assist the Company in obtaining or retaining business.

To ensure that you do not violate this standard, it is the Company’s policy that, except for legally mandated fees (for example, required permit or license fees), no payments, entertainment, gifts or other items of value will be made to foreign officials, directly or indirectly, unless approved in advance by the Global Legal Organization as lawful under U.S. and other applicable laws.

Always be direct and honest in dealings and communications with government employees. Any knowing or willful false statements to government employees (oral or written), and particularly any false statement under oath, can expose the Company and its people to substantial penalties.
Beyond the obvious or traditional government employees, remember that in some countries government workers can include university professors, schoolteachers, dentists, veterinarians, doctors and state media employees.

For more detailed guidance on the Company’s policies in these areas, see “Colgate-Palmolive Guidelines on the U.S. Foreign Corrupt Practices Act” and “Colgate-Palmolive Guidelines on Business Relationships with Government Entities,” which are found in the Company’s Business Practices Guidelines.

**WE MANAGE RECORDS ACCORDING TO THE LAW.**

We comply with all laws and regulations relating to the management of Company records (including physical documents and electronic data).

If the existence of a subpoena, litigation or an impending government investigation is known or reported to you, immediately contact the Global Legal Organization. In such a case, you must retain all records that may be responsive to the subpoena, are relevant to the litigation, or that may pertain to the investigation, regardless of the requirements of the Record Retention Program. You must not destroy or alter such records, as the improper destruction of records could have serious consequences – including civil and/or criminal penalties – for the Company and for you personally. If you have a question as to whether a record pertains to an investigation, litigation or a subpoena, contact the Global Legal Organization before disposing of the record in question.

**WE COMPLY WITH INTERNATIONAL TRADE REGULATIONS.**

In the conduct of both its domestic and overseas operations, the Company fully complies with all applicable laws – particularly U.S. laws – governing imports, exports and the conduct of business with non-U.S. entities. These laws contain limitations on the types of products that may be imported into the United States and the manner of importation. They may also prohibit exports to, and most other transactions with, certain countries. Cooperation with or participation in foreign boycotts of countries that are not boycotted by the United States is also prohibited. Colgate people must conduct Company activities so as to fully comply with the laws of the countries in which they operate; however, there may be a time when there is a conflict between the laws of one country and those of the United States or Company policy. Should you become aware of such a conflict, you should notify your manager and consult the Global Legal Organization.

For more detailed guidance on these laws and the countries to which they pertain, see “Colgate-Palmolive International Business Activities Guidelines,” which are found in the Company’s Business Practices Guidelines.
The Company strives to be a contributing member of the global community. We are a citizen of each locality where we operate and, like individual citizens, have a civic responsibility to support the health, education and welfare of the community.

WE PARTICIPATE IN LOCAL GIVING AND VOLUNTEERISM.

Throughout the world, it is our goal to take part in projects to further the development and welfare of the local community. Such projects include participating in charitable drives and assuming responsibility for aiding the poor, injured and homeless at the time of national disaster. Our primary focus is on young people, particularly the education of young people. Colgate believes that investments made in children today will benefit us all tomorrow. That is why the Company sponsors reading programs, mentoring initiatives, athletic competitions and other youth activities around the world. These efforts foster in youth a spirit of competition and achievement.

The Company also encourages its people to participate on their own time in local charitable activities of their choice.

WE WORK WITH GOVERNMENTS ON ISSUES THAT AFFECT OUR BUSINESS.

Truly global in scope, our Company sells its products in over 200 countries and territories. It is our policy to work cooperatively with local and national governments. From time to time, issues may arise that affect our operations. After careful consideration, the Company will offer opinions and recommendations to governments on particular issues to support our business goals and needs.

WE OPPOSE EXPLOITIVE, INHUMANE LABOR PRACTICES.

Colgate opposes the illegal use of child labor, the exploitation of children, and all other forms of unacceptable treatment of workers. Moreover, it is Colgate's policy not to work with any supplier or contractor known to operate with unacceptable worker treatment, such as the exploitation of children, physical punishment, female abuse, involuntary servitude or other forms of abuse. No abuse of child or other labor laws is acceptable to the Company, and if any violation of our principles becomes known to the Company, it is grounds for immediately terminating the business relationship.

WE DEMONSTRATE OUR COMMITMENT TO UNIVERSAL HUMAN RIGHTS.

Colgate is committed to respect for human rights worldwide. To that end, Colgate practices and seeks to work with business partners that promote the following standards:

- equal opportunity for all employees at all levels regardless of race, color, religion, sex, gender identity, national origin, ethnicity, age, sexual orientation, disability, marital status, veteran status or any other characteristic protected by law in any of the terms or conditions of employment;
• a safe and healthy workplace protecting human health and the environment;

• paying employees a wage that enables them to meet at least their basic needs, and providing employees the opportunity to improve their skills and capabilities;

• respecting employees’ lawful freedom of association; and

• working with governments and communities in which we do business to improve the educational, cultural, economic and social well-being in those communities.
A cleaner, healthier environment is important to Colgate not only because it’s the right thing to do but also because it makes good business sense. Our concern with doing our part to protect our planet focuses on operating in a manner that is safe for the environment and that protects our world for future generations.

WE ARE COMMITTED TO SUSTAINABILITY AND SOCIAL RESPONSIBILITY.

At Colgate, sustainability is a long-term business imperative, critical to the success of the Company. It is rooted in our Colgate values of Caring, Global Teamwork and Continuous Improvement. Our focus is on People, Performance and Planet.

In addition, we are committed to achieving our global sustainability objective of ensuring that Colgate’s business grows consistently and responsibly and benefits those we serve, including employees, our shareholders and other stakeholders globally, while promoting the well-being of future generations.

Over the past few years, our commitment to sustainability and social responsibility has increased as we have integrated these initiatives into our business operations. This integrated approach has strengthened our sustainability and social responsibility initiatives and our business performance, helping us recruit and retain the best talent, enhancing our relationships with our stakeholders, and offering new opportunities for innovation. Perhaps most importantly, this commitment has excited and engaged Colgate people around the world.

Our sustainability policies and programs are summarized for you to view in the “Living Our Values” section of the www.ColgatePalmolive.com website.

WE SAFEGUARD AND PROTECT THE ENVIRONMENT.

The Company is committed to protecting the environment. Therefore, we must each comply strictly with the letter and spirit of applicable environmental laws and regulations and the public policies they represent. No individual or manager in the Company has authority to engage in conduct that does not comply with this policy, or to authorize, direct, approve or condone such conduct by any other person.

We will promote open communication with the public and seek an active and productive partnership with the communities in which we operate. We will continue to share information with consumers about our environmental policy and programs and work with community leaders and all others who share our commitment to protect our environment for future generations.

In our ever-changing world, Colgate places a high priority on operating in a responsible and respectful manner. These efforts have led to increased efficiencies and financial advantages for the Company. We know that there is still much to be accomplished. Our ongoing strategy to reduce our environmental footprint will remain an integral part of producing, packaging, distributing and marketing our products.

For further information regarding the environmental laws applicable to the Company and the Company’s related policies and procedures, please refer to the “Colgate-Palmolive Environmental, Occupational Health and Safety Policy Statement,” which is found in the Company’s Business Practices Guidelines.
We strive to serve the best interests of our shareholders and to help build shareholder value.

WE UPHOLD GOOD CORPORATE GOVERNANCE TO PROTECT SHAREHOLDER VALUE.

The Company’s corporate governance policies and programs, of which this Code of Conduct is a key component, serve as an important shareholder safeguard. In recent years many checks and balances have been enacted by Congress, the SEC, the New York Stock Exchange, and other regulators and authorities around the world in order to promote the ethical corporate behavior that has been standard practice at Colgate for many years. Our shareholders are well served by an independent board, made up of a substantial majority of independent directors, and independent committees that oversee audit, compensation and governance matters. Frequently updated committee charters and governance guidelines clearly define director roles and responsibilities and the Company's corporate governance principles.

For a more detailed description of the Company's corporate governance program, please see the “Colgate-Palmolive Company Board Guidelines on Significant Corporate Governance Issues” and the charters of the Company’s Audit Committee, Nominating and Corporate Governance Committee, Personnel and Organization Committee and Finance Committee, all of which are available on the Company’s website.

WE MAINTAIN STRONG AUDIT PROGRAMS TO INCREASE INVESTOR CONFIDENCE.

The Company is committed to the quality, integrity and transparency of its financial reports. This commitment is reflected in the Company’s longstanding policies and procedures, including an internal audit group monitoring financial controls worldwide, independent auditors who have a broad mandate, and an independent Audit Committee overseeing these areas. To maximize the effectiveness of these resources, Colgate people are expected to engage in open and honest communication and a free exchange of information with the internal and external auditors and the Audit Committee.

For additional information regarding the important roles of the Company’s internal auditors, independent auditors and Audit Committee, please see the “Colgate-Palmolive Company Audit Committee Charter,” which is available on the Company’s website.

WE KEEP SHAREHOLDERS INFORMED ABOUT THE COMPANY’S PROGRESS.

Each year shareholders are invited to attend the Company’s annual meeting at which the progress of the Company during the past year is reviewed and shareholders have the opportunity to ask questions of the senior management of the Company. In the intervening months, shareholders may visit the Company’s website, www.ColgatePalmolive.com, for information about recent product launches, the latest financial results, the Company’s sustainability efforts and other business developments.
Having a written code of conduct is not enough – the standards of conduct must be communicated to and complied with by those who are asked to follow them.

**COMMUNICATION AND DISCLOSURE ARE ESSENTIAL.**

In accepting employment with Colgate, each of us becomes accountable for compliance with these standards of conduct, with all laws and regulations, and with the more detailed guidelines contained in the Business Practices Guidelines and in the other policies, procedures and guidelines prepared by our Company and its subsidiaries, operating units and divisions. Managers are responsible for communicating these standards to those they work with, ensuring that they understand and abide by them, and creating a climate in which people can discuss ethical and legal issues freely.

**COLGATE’S GLOBAL ETHICS AND COMPLIANCE DEPARTMENT OVERSEES COMPLIANCE**

Compliance with the Code of Conduct and Business Practices Guidelines will be monitored by the Global Ethics and Compliance Department. The Department reports to the Chief Executive Officer/Chairman of the Board and the Chairman of the Audit Committee of Colgate's Board of Directors regarding the establishment, implementation and enforcement of the Code of Conduct and related programs.

Information reported to the Global Ethics and Compliance Department or through other channels is, as appropriate, communicated on a confidential basis to the Audit Committee.
SEEK GUIDANCE AND REPORT CONCERNS

YOU ARE ENCOURAGED TO SEEK GUIDANCE.

This Code cannot provide definitive answers to all questions. For that we must ultimately rely on each person's good sense of what is required to adhere to the Company's high standards, including a sense of when it is proper to seek guidance on the appropriate course of conduct.

In most instances, you should bring questions concerning the guidelines described in this Code to the attention of your direct manager or the Global Legal Organization, who may in turn refer such matters to his or her supervisor, another lawyer in the Global Legal Organization, the Global Ethics and Compliance Department, or the Human Resources Department for the particular unit or division. You may also contact higher levels of management or the Global Ethics and Compliance Department yourself – either directly or via the Colgate-Palmolive EthicsLine (formerly known as the Hotline), as described below.

YOU MUST REPORT SUSPECTED VIOLATIONS.

If you know of, or have a good reason to suspect, a violation of the Code or other Company guidelines, you are required to immediately report that information to your manager, Human Resources or the Global Legal Organization. Alternatively, you should feel free to go to higher levels of management or to the Global Ethics and Compliance Department without fear of reprisal. Colgate will not retaliate against any individual who reports information concerning potential violations in good faith, or who participates in any investigation or proceeding by the Company or the government, unless the information provided is found to be intentionally false. The Company will also take all necessary steps to keep an individual's identity and the information he or she submits confidential, and will only disclose information on a need-to-know basis when that disclosure is:

- Unavoidable in order to conduct an effective investigation and take appropriate action or
- Otherwise required by applicable law.

YOU CAN CONTACT THE GLOBAL ETHICS AND COMPLIANCE COLGATE-PALMOLIVE ETHICSLINE.

The purpose of the Colgate-Palmolive EthicsLine is:

- To provide Colgate people with advice and to help clarify how the Code of Conduct might apply to specific situations; and
- To provide an alternative means of communication for people to bring information about violations of the law, or activities in conflict with the Code of Conduct, to the Company’s attention.

You may contact Global Ethics and Compliance through our 24-hour Colgate-Palmolive EthicsLine at 1-800-778-6080 (North America) or 1-212-310-2330 (collect from all locations outside North America).

You may also contact Global Ethics and Compliance through regular mail, e-mail or fax. The mailing address is:

Global Ethics and Compliance
Colgate-Palmolive Company
300 Park Avenue, 8th Floor
New York, NY 10022

The confidential e-mail address is: ethics@colpal.com. The confidential fax telephone number is: 1-212-310-3745.
We encourage you to contact Global Ethics and Compliance to ask questions about, or to report any suspected violations of, the Code of Conduct. We take your concerns seriously and all reported violations will be promptly investigated. It is imperative that reporting persons do not conduct their own investigations, as investigations may involve complex legal issues. Acting on your own may compromise the integrity of an investigation and adversely affect both Colgate and you.

We encourage you to identify yourself when calling to facilitate the investigation and follow-up. Where local law permits, you may submit information on an anonymous basis. There are laws in some countries that restrict the type of information you may report. If these laws apply to your situation, a Global Ethics and Compliance representative will refer you to someone in your business unit who can assist you with your question or concern.

For the purpose of investigating a violation or suspected violation of the Code of Conduct or Business Practices Guidelines, it may be necessary to transfer personal data collected in one country to other countries, including the United States. Further, any actual or suspected violation of the Code or Business Practices Guidelines might result in a report being made to the Global Ethics and Compliance Department, which may contain personal data. In such cases, personal data may be used by Company employees and Colgate entities that participate in the operations of the Global Ethics and Compliance Department to investigate the report, but only for such period as is reasonably necessary for this purpose (and thereafter such personal data will be destroyed or retained only as required by Company policy or by law).

DISCIPLINARY ACTIONS MAY BE TAKEN.

The Company’s policy is “zero tolerance” for any conduct that violates the Code of Conduct or Business Practices Guidelines. This means that when an occurrence of a violation has been verified, appropriate action commensurate with the nature and pervasiveness of the violation will be taken. As such, the Company intends to prevent the occurrence of conduct not in compliance with the Code or Business Practices Guidelines and to halt any such conduct that may occur as soon as reasonably possible after its discovery. Colgate people who violate the Code or Business Practices Guidelines may be subject to disciplinary actions, up to and including termination, subject to local law.

THE CODE APPLIES TO ALL OF COLGATE PEOPLE AND COMPANY ACTIVITIES.

The Code is applicable to everyone who works for the Colgate-Palmolive Company and its subsidiaries, including officers, and also applies to the Company’s directors and agents in accordance with applicable law. Copies of the Code, available from the Global Ethics and Compliance Department, should be provided to persons or entities retained and authorized to act on behalf of the Company in areas to which the Code is applicable. Colgate people around the globe demonstrate their commitment to compliance and the Company's ethical standards by participating in Code of Conduct training and certification on an annual basis.
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FREQUENTLY ASKED QUESTIONS

Q: Where can I find the Colgate Code of Conduct?
A: You can find it on OurColgate.com as well as on Colgate’s external website www.ColgatePalmolive.com. If you don't have Internet access, you can also obtain a copy from Human Resources anywhere in the world. The Code is available in 40 languages.

Q: How do I know what standards apply in the workplace?
A: Colgate complies with all laws and regulations everywhere we operate. In addition, there may be specific Company policies and procedures that address the topic. Start with the Code of Conduct—but make sure to ask your manager, Human Resources, Global Ethics and Compliance, or the Global Legal Organization if you don’t find the answer you’re looking for.

Q: To whom does the Code of Conduct apply?
A: All Colgate employees at all levels must adhere to the Code of Conduct. There are no exceptions.

Q: What if I violate Company policy by accident?
A: All Colgate employees have a responsibility to ensure that their actions are consistent with the Code of Conduct. This is why we ask you to review and certify to the Code of Conduct each year, and to complete any required training you are assigned. You are also expected to bring any questions or concerns to your manager, Global Ethics and Compliance, or the Global Legal Organization. If you take actions that are inconsistent with the behaviors described in the Code or other Company policies, stating that you had good intentions or that you didn't know your actions were inappropriate may not protect you from disciplinary action or legal consequences.

Q: My manager told me to do something that I think might be against the law. What should I do?
A: You should talk to your manager to make sure that you understand the request. If, after that conversation, you still have concerns, you should contact Global Ethics and Compliance on the Colgate Colgate-Palmolive EthicsLine or the Global Legal Organization to report your concerns:

Colgate-Palmolive EthicsLine
ethics@colpal.com
1-800-778-6080 (North America)
1-212-310-2330 (call collect from outside North America)
1-212-310-3745 (Fax)

Remember, it is never acceptable to break the law, regardless of who told you to do it. Never risk your job or the Company's reputation by doing something illegal or unethical.
Q: Where can I go for training on additional compliance and ethics-related questions?

A: Contact local Human Resources, Global Education and Training, the Global Legal Organization or Global Ethics and Compliance.

Q: Is the Code of Conduct confidential?

A: No, we make our Code of Conduct available on our website and provide copies upon request.

Q: Do we expect our suppliers to follow Colgate’s Code of Conduct?

A: We expect our suppliers to demonstrate the same high ethical standard that we adhere to within the company. Colgate-Palmolive Company has developed a Supplier Code of Conduct, which is available in several languages and can be found on our Company website under the “Work with Us” section for Suppliers.
LEARN • ACT • SPEAK UP

You may contact Global Ethics and Compliance through our 24-hour Colgate-Palmolive EthicsLine 1-800-778-6080 (United States) or 1-212-310-2330 collect (International), or through regular mail, e-mail or fax

Global Ethics and Compliance
Colgate-Palmolive Company
300 Park Avenue, 8th Floor
New York, NY 10022
ethics@colpal.com
1-212-310-3745 (fax)

NON-RETALIATION POLICY

It is Colgate's policy and practice to maintain the highest ethical standards and 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, at Colgate, 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, unless the allegation made or information provided is found to be intentionally false. To the maximum extent possible, Colgate will maintain the confidentiality of all complaints. All allegations of retaliation will be investigated, and if appropriate, disciplinary action will be taken, up to and including termination.