



**COLGATE-PALMOLIVE COMPANY**

# Third Party Code of Conduct



The Colgate-Palmolive Company and its subsidiaries and affiliates throughout the world take enormous pride in Colgate's longstanding reputation for integrity, which is vital to our success as a Company. The strength of Colgate's reputation is based not only on our own conduct but also on the actions of those with whom we do business. For that reason, we aspire to work only with third parties who share our values and reflect the same high ethical standards.

This Third Party Code of Conduct has been developed to convey our expectations regarding the ethical conduct we expect from our suppliers, distributors, agents, customers, research partners, and all other third parties with whom we work (our "Third Party Partners"). This document is consistent with the Colgate-Palmolive Company Code of Conduct, which is available on our [corporate website](#). Sections of this Third Party Code are modeled on, or contain language from, the Universal Declaration of Human Rights and the standards of the International Labour Organization.

We require our Third Party Partners to take reasonable steps to ensure that this Third Party Code of Conduct is communicated throughout their organizations and made available to their employees and subcontractors who work on Colgate business.

We expect you, as our Third Party Partner, to share our commitment to comply with the following standards to the extent they are applicable to our business relationship:

### **Compliance with Laws**

As a Third Party Partner working with Colgate, you are required to comply with all applicable laws, rules, regulations and treaties, including but not limited to laws related to anti-bribery, competition, business conduct, product quality and ingredients, environmental standards, occupational health and safety, privacy and data protection, labor and employment, and any other laws described herein or that are otherwise applicable to the products and/or services you provide to Colgate in all locations in which you conduct business operations.

### **Anti-Bribery**

Colgate's is committed to dealing legally and ethically with governments worldwide. We require all of our Third Party Partners to comply with the Colgate-Palmolive Global Anti-Bribery Policy, as well as with all applicable anti-bribery laws, including but not limited to the U.S. Foreign Corrupt Practices Act ("FCPA").

All Third Party Partners acting on our behalf or in connection with our business are prohibited from giving or offering anything of value directly or indirectly to any government official or entity in order to improperly obtain any business advantage or affect any government act or decision. This prohibition includes facilitating, expediting or "grease" payments made to government officials, either directly or indirectly, in order to expedite any official service or function.

Company policy requires advance written approval from Colgate's Global Legal Organization before any funds may be provided to or spent on behalf of government officials or entities. This includes any funds spent by our Third Party Partners such as gifts, donations, sponsorships, lecture fees or other payments, as well as meals, travel, entertainment or other items of value. If you anticipate that you will make any such expenditure on Colgate's behalf or in connection with our business, you must provide advance notice to Colgate in order to obtain the required approval.

In addition to prohibiting the bribery of government officials, Colgate also prohibits its employees and Third Party Partners from engaging in the bribery of private parties.

## **Antitrust / Competition Law**

Colgate requires that all of our Third Party Partners conduct their business in full compliance with applicable competition laws (known in the U.S. as antitrust laws). These laws are intended to promote free and fair competition in order to benefit consumers. Under these laws, companies may not interfere with the market forces of supply and demand. Rather, they must compete for business through means such as offering lower prices, more innovative products and better service. Prohibited actions include, but are not limited to, abuse of a dominant market position as well as any agreements or understandings among commercial parties that affect prices (e.g. price fixing, market allocation, group boycotts, resale price maintenance, unlawful discrimination on prices or restrictions on trade, etc.).

## **Confidential/Proprietary Information**

Our Third Party Partners must respect Colgate's intellectual property, trade secrets and other confidential, proprietary or sensitive information and may not use or disclose any such information except in accordance with their contract with Colgate or with Colgate's prior written consent. Any information or data regarding Colgate must be treated as confidential at all times unless that information becomes publicly available through no fault of the Third Party Partner. Our Third Party Partners may not disclose Colgate's confidential or proprietary information to persons outside of their organizations, nor may they disclose such information within their own organizations except on a strict "need to know" or "need to use" basis for the purpose intended by Colgate. Third Party Partners are also prohibited from using this information for their own benefit or the benefit of any other person or entity besides Colgate.

Colgate's policy is to work with Third Party Partners on a non-confidential basis wherever possible. We therefore expect our Third Party Partners to provide Colgate with only non-confidential, non-proprietary information and to agree that Colgate may disclose or use any information or ideas disclosed by the Third Party Partner in any way without compensation or legal responsibility to anyone. Nothing in this section is meant to modify or negate an existing confidentiality or non-disclosure agreement between Colgate and one of its Third Party Partners.

Colgate will only accept confidential information from a Third Party Partner if it is absolutely necessary and only after a written agreement with the appropriate safeguards has been put in place. Our Third Party Partners must also understand and acknowledge that Colgate may have or may undertake other projects or programs related to the same or similar areas as those discussed with a given Third Party Partner.

## **Data Privacy**

As our Third Party Partner, you must respect the privacy of Colgate employees, consumers, customers, suppliers and other Third Party Partners, and must take all reasonable and appropriate steps to safeguard personal information provided pursuant to your business relationship with Colgate. We require our Third Party Partners to collect, process, use, store and retain personal information obtained from Colgate, or about Colgate employees, consumers, customers, suppliers, and other Third Party Partners, only as necessary and in compliance with all applicable data privacy and data protection laws.

In the event that a Third Party Partner collects, processes, uses, stores or retains personal information at Colgate's request or on Colgate's behalf, such Third Party Partner will be required to agree to certain contractual obligations with Colgate to ensure that it complies with Colgate's standards regarding the protection of such personal information.

## **Ethical Dealings**

Honest dealing among business partners is essential to sound business relationships. Colgate seeks to give fair and equal consideration to all potential and existing Third Party Partners, and to base our decisions on objective criteria such as price, quality, and service capability as well as reliability and integrity. We extend no personal favors on prices, promotional allowances, marketing assistance or the like. Giving or receiving any kickbacks, bribes or

similar improper benefits of any sort is prohibited. We expect our Third Party Partners to demonstrate these same high ethical standards and to conduct all business transactions with integrity and fairness

### **Expenses**

Colgate will not reimburse expenses incurred by a Third Party Partner unless expressly identified as reimbursable in a written agreement with Colgate or otherwise pre-approved by Colgate in writing prior to being incurred. Any expense to be reimbursed by Colgate must be supported by detailed documentation including valid invoices or receipts.

### **Gifts**

Colgate people are prohibited from giving or receiving gifts, payments or other benefits or items of value that could influence, or appear to influence, any business decision. We ask our Third Party Partners to respect this policy, and refrain from offering any Colgate employee (or close family member of a Colgate employee) a gift or other benefit that is more than nominal in value (over \$50.00 USD.) While Colgate employees may accept a gift from a Third Party Partner with a value of less than \$50 USD, they may do so only once per calendar year.

### **Health and Safety**

Our Third Party Partners must provide a safe and healthy work environment for all employees working at their sites by maintaining a focus on health and safety and complying with all applicable laws, rules and regulations. Any person providing on-site services in a Colgate facility is required to adhere to Colgate's occupational health and safety standards.

### **International Trade Regulations**

Colgate requires our Third Party Partners to comply with applicable trade and import regulations. When working on Colgate business, our Third Party Partners are also required to comply with U.S. trade regulations, regardless of where in the world they are operating. Specifically, these regulations require that business may not be conducted on Colgate's behalf with any persons, entities or countries subject to U.S. sanction or embargo. In connection with Colgate business, our Third Party Partners are also prohibited from participating in boycotts that are not sanctioned by the U.S. government.

### **Labor Practices and Universal Human Rights**

Colgate strongly opposes the use of illegal child labor, forced or bonded labor, human exploitation, and all other forms of unacceptable treatment of workers. It is Colgate's policy not to work with any third parties known to violate labor laws or otherwise utilize inhumane labor practices, including exploitation, physical punishment, abuse, involuntary servitude or other forms of mistreatment.

Colgate has a long-standing commitment to respecting human rights worldwide and seeks to work with Third Party Partners who promote the following standards in accordance with applicable law:

- All work is performed on a voluntary basis and does not involve any slave, bonded, forced or indentured labor or any other forms of compulsory labor, slavery or human trafficking;
- Unless required by law, workers original identification documents, travel documents or any other personal documents or valuables are not surrendered upon hiring, during employment or during the recruiting process;
- Throughout the recruiting and hiring process and during employment, employees are not required to pay any fees or deposits (monetary or otherwise), including to any agency, recruiter or broker;

- If Third Party Partners utilize recruitment agencies, they should use only legitimate and reputable recruitment agencies which are properly licensed to operate under applicable local laws;
- Employees' freedom of physical movement should not be confined or restricted:
- Equal opportunity is available for employees at all levels regardless of color, race, gender, gender identity, age, ethnicity, national origin, sexual orientation, marital status, religion, veteran status, disability or any other characteristic protected by law;
- A safe and healthy workplace is provided that promotes wellbeing and protects the environment;
- Wages should not be withheld or delayed and should comply with all applicable laws and regulations;
- Working hours and compensation for overtime hours is in accordance with local laws; and
- Employees' lawful freedom of association and all legal rights to organize and collectively bargain are respected.

Colgate requires its third party business partners to comply with its [Policy on Conflict Minerals](#)

### **Protecting the Environment**

Colgate places a high value on the protection of our environment and is committed to doing our part to help preserve the Earth's finite resources. We expect our Third Party Partners to comply strictly with the letter and spirit of applicable environmental laws and regulations, as well as the public policies they represent. Any person providing on-site services in a Colgate facility is required to adhere to Colgate's environmental standards.

### **Quality Standards**

Colgate will only do business with Third Party Partners that produce, package, store, ship or otherwise handle product in accordance with the good manufacturing, distribution and professional service practices prevailing in their respective industries.

### **Welfare of Animals**

Where applicable, Colgate's Third Party Partners, and any external facilities they utilize or support, must meet or exceed all industry standards and regulations regarding animal care, handling and welfare. We expect our Third Party Partners to demonstrate high ethical standards concerning animal welfare as outlined in Colgate's [Product Safety Research Policy](#) and in [Hill's Commitment to Animal Welfare](#).

### **Your Responsibility for Compliance**

It is your responsibility to ensure that your employees, agents and subcontractors working on Colgate business understand and comply with this Third Party Code of Conduct. Failure to adhere to this Third Party Code of Conduct or any applicable law is grounds for Colgate to terminate the business relationship.

Colgate expects our Third Party Partners to have reasonable and appropriate systems in place to investigate and remediate allegations of wrongdoing, to the extent permissible by local law. You are required to immediately notify Colgate upon becoming aware of any potential violations of applicable law or this Third Party Code of Conduct, or of any other allegations of wrongdoing related to Colgate business.

You must also immediately notify Colgate upon becoming aware of any negative or adverse publicity concerning your business or any product or service you provide to Colgate, or any event or circumstance related to you or your

business that could be reasonably expected to cause negative or other adverse publicity concerning Colgate.

### **Additional Information and Resources**

This Third Party Code of Conduct is available in [additional languages](#) online at the Colgate-Palmolive Company website.

Any questions regarding this Third Party Code of Conduct can be directed to the Colgate-Palmolive Company's Global EthicsLine via email at [ethics@colpal.com](mailto:ethics@colpal.com).