

**Respecting Human Rights and Labor Rights:**

**Modern Slavery/Fundamental Human Rights and Decent Working Conditions Statement**

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

This consolidated Statement describes the Company's efforts to address fundamental human rights, including modern slavery and decent working conditions and relates to our fiscal year that began January 1, 2023 and ended December 31, 2023. This Statement applies to our own business, our business partners and the supply chains of all brands which Colgate-Palmolive owns including oral care, personal care, home care, skin care and pet care nutrition. The Company has created a compliance framework for mapping our global supply chain, as well as mapping activities that potentially create risk for modern slavery abuse.

This Statement has been published pursuant to Australia's Commonwealth Modern Slavery Act, California's Transparency in Supply Chains Act, Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act, the United Kingdom's Modern Slavery Act and the Norwegian Transparency Act. This Statement also describes how Colgate-Palmolive's program aligns with the Organisation for Economic Co-operation and Development's (OECD) Due Diligence Guidance for Responsible Business Conduct, International Labour Organization's (ILO) Worst Forms of Child Labour Convention (Convention No. 182), ILO's Minimum Age Convention (Convention No. 138) and the ILO-IOE Child Labour Guidance Tool for Business, satisfying the equivalent regulation exemption under the Swiss Ordinance on Due Diligence and Transparency in relation to Child Labor. We have common policies and compliance procedures relating to human rights, decent working conditions and mitigating modern slavery risks across our businesses. However, not all of our group companies are subject to the Acts referred to above. To the extent applicable, the signature pages to this Statement include additional disclosures specific to the entities required to prepare a statement under one or more of the laws listed above in this paragraph.

As used in this Statement, "fundamental human rights" and "human rights" are internationally recognized human rights, including those under the International Covenant on Economic, Social and Cultural Rights, the International Covenant on Civil and Political Rights and the ILO core conventions. "Decent working conditions" are those that safeguard fundamental human rights and health, safety and the environment in the workplace, while providing a living wage. As used in this Statement, "modern slavery" encompasses forced labor, prison labor, indentured labor, bonded labor, debt servitude, state imposed forced labor, human trafficking, child labor and

other similar conduct commonly thought of as modern slavery.

### ***Our Organization, Business and Supply Chain***

Founded in 1806, Colgate-Palmolive is a caring, innovative growth company reimagining a healthier future for people, their pets and our planet. By living our Colgate-Palmolive values of We are Caring, We are Inclusive and We are Courageous, we create a culture in which people act as a team, working together toward common goals. These evolved values, which were reimagined in 2023, represent who we are and inspire Colgate people to carry Colgate forward into the future.

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

### ***Commitment to Human Rights and Decent Working Conditions***

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

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

### ***Our Policies***

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

#### **Employee Code of Conduct and Global Business Practices Guidelines**

Since 1987, our [Code of Conduct](#) has served as a guide for our daily business interactions, reflecting our corporate values and our standards for ethical behavior. Colgate-Palmolive's

Code of Conduct communicates our commitment to oppose all forms of unacceptable treatment of workers.

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

#### Third Party Code of Conduct

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

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

The Third Party Code of Conduct states Colgate-Palmolive's policy not to work with any supplier or contractor known to utilize inhumane labor practices, including exploitation, physical punishment, abuse, involuntary servitude, prison labor, bonded labor, any form of human trafficking, child labor or other forms of mistreatment. Suppliers and business partners are expected to apply the Third Party Code of Conduct across their entire operations.

#### Additional Policies

We have additional policies that directly or indirectly support our commitment to prevent modern slavery, respect human rights and promote positive working conditions:

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

Our Policies are publicly available on the Colgate-Palmolive website:  
<https://www.colgatepalmolive.com/en-us/sustainability/our-sustainability-policies>

## ***Human Rights Strategy***

Through the development of our human rights strategy and risk assessment process, we identified salient issues (which are stated below) and the groups most vulnerable to human rights abuses, including modern slavery. Below is an overview of these findings and our human rights strategy more generally.

The groups most vulnerable to human rights abuses include individuals working in "high risk" geographies or industry sectors, particularly where migrant or temporary workers are utilized.

Particular industry sectors and/or commodities of focus for human rights risks include:

- Palm oil;
- Soy;
- Pulp & paper packaging / associated timber industry;
- Meat processing and production (e.g., beef, poultry and pork);
- Mica;
- Agricultural / farm / aquaculture production materials (including rice, corn, fish and acai);
- Conflict minerals; and
- Third party labor service providers working in our manufacturing and warehouse sites

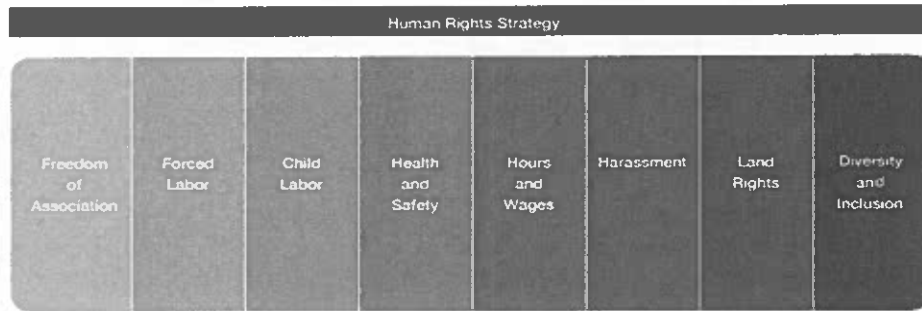
In addition, we also want to acknowledge the human rights risks of those taking action to defend such rights. Human rights defenders play a critical role in the protection of human and labor rights and protection of the environment. A "human rights defender" can be any individual, community group or organization advocating for the protection and respect of human rights, including workers rights, land rights, freedom of expression, rights to livelihoods and the right to justice and the rule of law.

We believe in the protection of human rights defenders and do not tolerate threats, intimidation, physical or legal attacks, or reprisals against them. Aligned with the UN Special Rapporteur on the situation of human rights defenders, we believe that both states and businesses should actively support and promote the role of human rights defenders and speak out when human rights defenders are targeted as a result of their important work. We will take action as appropriate to address adverse impacts on human rights defenders within our own operations or as a result of our business relationships. We will seek to collaborate with other companies, civil society, worker representatives and trade associations as well as governments and other stakeholders to protect and respect human rights and those who work to defend the human rights of others and the environment.

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

partners.

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



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

Freedom of Association

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

Forced Labor

Colgate-Palmolive will not use forced labor within our own operations. We also strive to eradicate forced labor from our value chains. We believe that every worker should have freedom of movement, no worker should pay for a job, and no worker should be indebted or coerced to work. We expect that suppliers will not hold workers' passports, original identification documents or other valuables unless required to do so by law. We also expect that fees and costs associated with recruitment and employment be paid by the employer, not the employee. Moreover, it is Colgate-Palmolive's policy not to work with any supplier known to use forced labor.

Child Labor

Colgate-Palmolive will not use child labor within our own operations. In alignment with Convention Nos. 182 and 138, child labor is defined herein as employing any person younger than the minimum age of completion of compulsory schooling, as legally permitted in the jurisdiction in question. However, in no event will we knowingly employ anyone younger than sixteen (16) years of age, even if the legal working age in a jurisdiction is lower. In the rare cases a minor (i.e., under the age of eighteen (18)) is employed by the Company, they are prohibited from performing work that (1) is mentally, physically, socially or morally dangerous, (2) interferes with their schooling by depriving them of the opportunity to attend school, obliging them to leave school prematurely or requiring them to attempt to combine school attendance with excessively long and heavy work or (3) constitutes one of the "worst forms of child labor" under Convention No. 182. Moreover, it is Colgate-Palmolive's policy not to work with any

supplier known to operate with child labor (as defined above).

#### Health and Safety

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

#### Working Hours and Wages

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

#### Harassment

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

#### Land Use Rights

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

#### Diversity and Inclusion

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

### ***Key Collaborations***

Eliminating adverse human rights impacts, including modern slavery, in supply chains is beyond the capabilities of any single company. We therefore work extensively with other stakeholders, including, but not limited to, governments, workers' organizations and NGOs to address these issues. Examples are discussed below.

#### AIM-PROGRESS

We are members of AIM-Progress and participate on the organization's leadership team.

AIM-Progress is a global forum of consumer goods companies sponsored by the European Brands Association (AIM) and the Consumer Brands Association (formerly GMA) in North America. The group's purpose is to promote responsible supply chain and sourcing practices covering labor and human rights, health and safety, environmental management and business integrity. Colgate-Palmolive actively participates in the AIM-Progress Human Rights work stream focused on the issues of forced labor, responsible recruiting and fair labor practices. Most recently in 2023 and 2024, Colgate-Palmolive and AIM-Progress members engaged with Verite on the development and deployment of training and engagement materials focused on migrant child labor in the United States. Participating members have engaged select supply chain partners, most notably contract manufacturers and contract packaging providers, in completion of the training.

#### Consumer Goods Forum

Colgate is a member of the Consumer Goods Forum and participates in the Forest Positive and Human Rights Coalitions. Through the Coalitions, we work with industry technical partners and peers to address the negative social elements commonly found in agricultural supply chains, including responsible recruitment, safe work practices, respect for land rights, and the protection of human and environmental rights defenders. In addition to assessing human rights risks in our supply chain, through our work in the Human Rights Coalition, we are also increasing our focus on temporary labor and third-party service providers providing workers and services within our own operations. This work includes helping to mitigate the risk of child labor in our value chain. Through the Coalition's work with the Fair Labor Association, we are implementing a human rights due diligence process across Colgate's owned and operated manufacturing and warehouse facilities.

#### Earthworm Foundation

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

In addition to the above partnerships and initiatives, Colgate supports numerous on the ground landscape and sectoral transformation projects in Indonesia, Malaysia, and Mexico. Through these projects Colgate, our implementation partners and co-supporting peers are engaging with local communities, governments and smallholder farmers to conserve forest ecosystems, implement resilient farming practices, ensure safe working conditions, support responsible land tenure, and improve the livelihoods of farmers.

### ***Due Diligence and Risk Assessment***

In addition to the policies and practices discussed above, to identify, assess, mitigate and

address actual and potential adverse impacts on fundamental human rights, decent working conditions issues and modern slavery risks in both our business and in our supply chains and at our business partners, among other things, we engage in risk assessments, utilize external audits and, if there is non-conformance with our requirements (including non-compliance with our Third Party Code of Conduct), require implementation of a corrective action plan (described in greater detail below). After remediation, our procedures contemplate ongoing monitoring and verification that our policies are being properly implemented.

Beginning in 2023, with the palm oil supply chain identified as a priority risk area for human rights, we implemented a public palm oil grievance management process detailing Colgate-Palmolive's actions taken to investigate palm-oil related grievances raised to the Company. Most recently, we launched a public palm oil grievance log and "no buy" list to transparently report on grievance investigations and suppliers suspended due to noncompliance with Colgate-Palmolive's policies.

Our human rights and labor compliance initiatives are informed by, and we believe consistent with, the recommendations provided for in the United Nations Guiding Principles on Business and Human Rights, the OECD's Due Diligence Guidance for Responsible Business Conduct, the OECD's Guidelines for Multinational Enterprises, and the ILO-IOE Child Labour Guidance Tool for Business. Some of these activities are further discussed below.

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

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

For high risk commodities, where possible, Colgate-Palmolive supports the sourcing of certified materials including RSPO certified palm oil, Forest Stewardship Certified (FSC) pulp and paper based packaging and Proterra Certification for all of our soybean meal and oils originating from South America. Through our membership in the Consumer Goods Forum - Forest Positive Coalition, we collaborate with our peers and industry experts to continuously improve their certification criteria.

#### Our Own Operations

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



as closed by third-party verification.

#### Our Third Party Business Partners and Supply Chain

Colgate-Palmolive's Supplier Responsible Sourcing Assessment (SRSA) program is a risk assessment and audit program focused specifically on social and environmental compliance at Colgate manufacturing facilities, contract manufacturers, raw and packaging material suppliers, warehouses, and co-packers. All suppliers are assessed through a country/sector risk pre-screen. Based on the results of this pre-screen, suppliers are selected for further evaluation through the Sedex Self-Assessment Questionnaire (SAQ). The SAQ allows suppliers to share information about their business with their customers by completing a set of questions based on Labour, Health & Safety, Environment, and Business Ethics.

After reviewing SAQ results and/or evaluating other external risk factors, suppliers are selected for SMETA 4-Pillar Audits to evaluate compliance on site. On average approximately 200 suppliers are evaluated annually by way of an SAQ or Audit.

If any areas of noncompliance are detected as a result of any of the foregoing, a corrective action plan is developed. We work with the supplier or business partner to ensure the findings are remedied on the timetable established. Through this approach, we seek to prevent additional harm to the employees of such suppliers and the loss of income to the most vulnerable families. The remediation of all areas of noncompliance is verified, independently in the case of SMETA audits. If a supplier or business partner is unable or unwilling to implement the corrective action plan, Colgate-Palmolive may terminate the business relationship. As applicable, we communicate with affected stakeholders on how adverse impacts are addressed.

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

Colgate-Palmolive also conducts forced labor risk assessments specifically for third party labor providers in our operations. This process applies globally. Colgate-Palmolive continues to evaluate opportunities to expand our human rights and labor rights risk assessment process for additional categories of suppliers.

In 2023, our focus has been on engaging our suppliers and internal teams on strengthening human rights due diligence approaches. For our suppliers, we developed and implemented a human rights due diligence questionnaire to assess the quality of our suppliers' due diligence approaches. We initially focused on agricultural supply chains associated with our Hill's Pet Nutrition business. Additionally, we are implementing internal due diligence processes to evaluate third-parties providing labor and facility services for our owned and operated manufacturing and warehouse facilities.

## ***Providing Access to Remedy***

### **Reporting & Remedying Grievances**

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

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

In addition to our general grievance hotline mentioned above, Colgate also has implemented a commodity specific, palm oil grievance management process which was expanded to include a public grievance log and no buy list in 2024.

### **Actions to Remedy**

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

Through Colgate's palm oil grievance process, we actively engage with palm oil suppliers on alleged noncompliances, communicating with stakeholders and taking action to drive resolution aligned with our grievance management process. Resolution actions may include ensuring suppliers implement a corrective action plan, engagement with certifying bodies to drive compliance or suspension of suppliers which remain noncompliant with our policies.

## ***Training***

Colgate-Palmolive requires that 100% of salaried and clerical employees complete Code of Conduct training each year, with all other employees completing the course every other year. Code of Conduct training also is required as part of the onboarding process. Code of Conduct training reinforces Colgate-Palmolive's commitment to, among other things, respecting workers' human rights and fair labor practices. Training is linked to compensation for certain employee

populations. In addition to training, the Company engages key internal stakeholders and senior leadership in raising awareness of human rights and labor issues.

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

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



Ann Tracy, Chief Sustainability Officer



COLGATE-PALMOLIVE COMPANY



Canadian Fighting Against Forced Labour and Child Labour in Supply Chains Act

Colgate-Palmolive Canada Inc. ("Colgate Canada") and Hill's Pet Nutrition Canada Inc. ("Hill's Canada" together the "Colgate-Palmolive Canadian Entities") are required to submit a statement pursuant to the Canadian Fighting Against Forced Labour and Child Labour in Supply Chains Act.

Each of the Colgate-Palmolive Canadian Entities are indirectly wholly-owned by Colgate-Palmolive Company and come within Colgate-Palmolive's global compliance program, which is discussed throughout this Statement. This Statement relates to all of Colgate-Palmolive's activities in Canada.

Colgate Canada had 85 employees as of December 31, 2023. Hill's Canada had 63 employees as of December 31, 2023. The Colgate-Palmolive Canadian Entities' operations include operating a commercial office and warehouse.

The Colgate-Palmolive Canadian Entities generally sell the same products as are sold by Colgate-Palmolive in other parts of the world and have the same regional and global supply chains as other Colgate-Palmolive companies, which are discussed earlier in this Statement.

We believe that the forced and child labor risks of the Colgate-Palmolive Canadian Entities mirror those of Colgate-Palmolive, as discussed earlier in this Statement. We seek to address the risks through the policies, procedures and other measures described earlier in this Statement.


In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for the entity or entities listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.

I have the authority to bind Colgate-Palmolive Canada Inc.

Jenn Porter

Senior Vice President, General Manager, Colgate-Palmolive Canada Inc.

May 22, 2024

  
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Jenn Porter

I have the authority to bind Hill's Pet Nutrition Canada Inc.

Arvind Chintamani

Senior Vice President, General Manager, Hill's Pet Nutrition Canada Inc.

May 22, 2024

  
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Arvind Chintamani