

Colgate-Palmolive Company

Forest-Based Commodities Grievance Procedure

1. Background

As part of our strategy to combat climate change, preserve biodiversity and ensure respect for human and labor rights, we are committed to responsible sourcing of forest-based commodities. In 2012, we published our global [No Deforestation Policy](#) to communicate our standards and expectations for the sourcing of our four major forest commodities: pulp and paper; palm oil and derivatives; soy and soy oil; and beef (tallow).

Our No Deforestation Policy includes, but is not limited to:

- No deforestation and no conversion of native vegetation, including protection of High Carbon Stock Forests, High Conservation Value Areas, no use of fire for land clearance, and no new development on peatlands regardless of depth;
- No exploitation of people or local communities, including respect for human rights, respect for 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 resources; and
- Compliance with all applicable laws and regulations at the national and international levels.

To support our overarching No Deforestation Policy, we have also established a [Policy on Responsible and Sustainable Sourcing of Palm Oil](#) (Palm Policy) and a [Responsible Soy Procurement Policy](#) (Soy Policy) to outline specific environmental and social commitments, our vision and the actions we are taking related to these commodities. Our [Third Party Code of Conduct](#) further outlines expectations for suppliers and other third parties with whom we work.

We believe all stakeholders play an important role in the implementation of our No Deforestation Policy. For this reason, we established this Grievance Procedure to guide our response to stakeholder grievances related to direct violations of our No Deforestation Policy, as well as our related Palm Oil Policy and Soy Policy. All grievances verified and accepted through the Grievance Procedure will be recorded, investigated and managed in a timely manner.

As a member of the Consumer Goods Forum (CGF) Forest Positive Coalition of Action (FPC) and Human Rights Coalition (HRC), we are aligned with the CGF Theory of Change and Coalition priorities to accelerate industry transformation, eliminate deforestation, and ensure respect of human and labor rights associated with our major forest-based commodities. Additional information on our position and actions on human and labor rights can be found in our [Respecting Human Rights and Labor Rights: Modern Slavery Statement](#). Our grievance

procedure is aligned with the CGF-FPC's Monitoring and Response Framework for deforestation and peat development conversion, and secondarily data on fire, related to palm oil. The CGF-FPC Monitoring and Response Framework was developed in consultation with industry and civil society stakeholders and provides guidance on addressing grievances related to deforestation and peat conversion with the aim of driving a more effective and efficient approach across the entire palm oil supply chain. We will regularly report on key performance indicators aligned with and as part of the CGF-FPC's membership annual reporting.

As a member of the Roundtable on Sustainable Palm Oil (RSPO), we recognize the RSPO's Complaints System. We may consider the RSPO's actions and decisions on cases in our own grievance procedure. Ultimately, decisions and actions on grievances are independently made by Colgate based on our own grievance procedure.

We are committed to providing a transparent, responsive and effective mechanism for stakeholders to raise grievances related to our relevant policies in scope with this procedure. We further intend to establish a public grievance log by the end of 2022.

2. Objectives

Feedback and input from stakeholders helps to support continued progress on the implementation of our Policies and enhances transparency in our forest-based commodity supply chains. This grievance procedure serves as a guide for how we investigate and respond to any grievances related to direct violations of our Policies and aims to ensure a timely, effective and transparent process. To address non-compliances, we engage with our suppliers to support effective resolution in line with this process as well as contribute to industry efforts to address environmental and social challenges related to our major forest-based commodities. In the event that a non-compliant supplier does not want to engage in the resolution process within expected timeframes or remains non-compliant with our Policies, we reserve the right to take further measures including reviewing its commercial relationship with that supplier.

3. Scope

Our No Deforestation policy and this related Grievance Procedure applies to pulp and paper, palm oil and derivatives, soy and soy oil, and beef (tallow), and to the sources of all Colgate's operations, subsidiaries and joint ventures. This includes our own operations as well as all suppliers of its four major forest based commodities (and associated materials) whether directly or indirectly supplying our company (indirect suppliers may include traders, refiners, millers, crushers and growers). Suppliers include all subsidiaries to a group that the company is connected to, even those not in Colgate's physical supply chain.

Grievances which allege violation of our No Deforestation Policy will be processed through this grievance procedure. This includes grievances raised through the channels outlined in this procedure, deforestation alerts from our spatial monitoring provider as well as other non-compliances identified by Colgate.

Our grievance procedure covers activities related to the handling of grievances with respect to the implementation of our No Deforestation Policy. This includes recording case details, taking actions to investigate and verify claims, rectifying confirmed issues, reporting on verification results and progress, and monitoring follow-up actions.

4. Roles & Responsibilities

Our Grievance Committee holds overall accountability for managing and resolving grievances. This Committee includes representatives from Responsible Sourcing, Procurement, Legal and our Corporate Communications departments. Additional internal teams may provide support, as needed.

Our Responsible Sourcing Lead coordinates tasks necessary for successful implementation of the grievance procedure, including receipt and documentation of grievances, investigation of claims, engagement with any external parties who raise grievances, and resolution and closure of grievance cases. Our Procurement Team plays an active role in supplier engagement related to the investigation, monitoring and resolution of grievances.

As part of the grievance process, credible external parties may be engaged to conduct additional and/or field verification as part of an External Verification Team. This may include upstream supply chain actors, technical advisors or other parties.

5. Procedure

- a) Grievances can be expressed via any of the following channels:
 - Via email to: responsible_sourcing@colpal.com or ethics@colpal.com
 - By telephone:
 - (800) 778-6080 (toll free from U.S., Canada and Puerto Rico)
 - 1-(212) 310-2330 (collect from all other locations)
 - In writing:
 - Global Ethics & Compliance, Colgate-Palmolive Company, 300 Park Ave, 3rd Floor, New York, NY 10022
 - Via on online tool: [Contact Us - Phone, Email or Online Chat | Colgate-Palmolive](#)

Grievances should include the following:

- Full Name
- Name of Organization (if any)
- Address
- Phone No./ Email Address (at least one contact point)
- Description of the grievance in detail
- Evidences to support the grievance

Contact details are recommended to seek further clarification on the grievance and/or to provide updates on the grievance process. The party reporting the grievance (Grievance Raiser)

may request that their identity remain confidential. Any party may appoint a third-party to submit their grievances provided that the third-party follows the procedure outlined above.

In addition to grievances submitted through the official channels above, issues raised through unofficial channels, such as the media and the internet, may be accepted into the grievance procedure.

- b) Preliminary research will be conducted on all potential Policy breaches to determine if:
- The grievance involves a violation of our Policies
 - There are specific allegations on which action can be taken
 - The grievance is connected to Colgate's supply chain (including at the parent company level)

Preliminary research also includes identification of links to any prior non-compliances. Technical stakeholders may be engaged to support verification of a submitted grievance.

- c) Based on the findings of the preliminary research, the Responsible Sourcing Lead will make a preliminary determination on whether the supplier's conduct warrants "acceptance" of the grievance, and entry onto the Company's grievance log. If the grievance is accepted, the Responsible Sourcing Lead will commence an investigation. The Responsible Sourcing Lead will notify the Grievance Raiser and engage in further dialogue with them as needed. If the grievance is not accepted, the Responsible Sourcing Lead will submit an explanation to the Grievance Raiser. Grievances outside the scope of this procedure may be handled through other Company channels, depending upon the nature of the alleged conduct.
- d) The Responsible Sourcing Lead will identify and engage relevant direct supplier(s) in consultation with Procurement teams. Where the allegation involves indirect supplier(s), relevant direct supplier(s) will be asked to engage upstream actors to support the investigation.
- e) The Responsible Sourcing Lead will consider next steps to be taken based on the investigation and actions outlined in the grievance procedure which may include establishment of an External Verification Team to undertake further investigation, development of an action plan to address the issues identified, or a review of our commercial relationship with the implicated parties. If it is determined through the investigation that the grievance is unmerited or no action is required, the Responsible Sourcing Lead will communicate this to the Grievance Raiser and update the grievance log.
- f) If the investigation determines that remedial action is required, we will review an action plan with the implicated supplier(s). Once an action plan is accepted by the implicated supplier and Colgate, the Responsible Sourcing Lead will monitor implementation of the

plan and update the grievance log, at regular intervals. The Responsible Sourcing Lead will also communicate progress with the Grievance Raiser.

- g) If the implicated party does not cooperate with verification requests, commit to a time-bound action plan, or successfully execute on the time-bound action plan, the Responsible Sourcing Lead, with support from the grievance committee and Procurement Team may recommend a review of the commercial relationship. If a supplier, whether direct or indirect, is suspended from Colgate’s supply chain, specific requirements for re-entry will be determined. The Responsible Sourcing Lead will update the grievance log and provide an update to the Grievance Raiser.
- h) A suspended supplier may return to our supply only after re-entry criteria have been identified, met and verified by the Responsible Sourcing Lead. The Responsible Sourcing Lead will regularly communicate a list of currently suspended companies to its direct suppliers.
- i) As part of our continuous improvement and governance process we will evaluate our grievance management data and process results annually with our Sustainability Steering Committee in order to assess trends and define changes to our Procedure including any needed policy adjustments.

Grievance Process Flow

Below is a simplified process flow of the above detailed grievance management process.

