



## **Respecting Human Rights and Labor Rights: Modern Slavery Statement**

Colgate-Palmolive Company and its subsidiaries (collectively, the “Company,” “Colgate-Palmolive,” “we,” “us” and “our”) strongly oppose modern slavery by any person or organization, including our business partners. Furthermore, as a global company, we are committed to compliance with all applicable modern slavery transparency laws. 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.

This consolidated Statement describes the Company’s efforts to mitigate the risks of modern slavery in its business and supply chains and relates to our fiscal year that began January 1, 2020 and ended December 31, 2020. This Statement has been published pursuant to California’s Transparency in Supply Chains Act, the United Kingdom’s Modern Slavery Act and Australia’s Commonwealth Modern Slavery Act. We have common policies and compliance procedures relating to modern slavery across our businesses. However, not all of our group companies are subject to the Acts referred to above.

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

Founded in 1806, Colgate-Palmolive is a consumer products company that serves people around the world. Colgate is a caring, innovative growth company reimagining a healthier future for people, their pets and our planet.

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

### ***Commitment to Human Rights and Ending Modern Slavery***

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

Colgate has a long-standing commitment to respecting human rights and labor rights worldwide and supports the United Nations Universal Declaration of Human Rights and the International Labour Organization (ILO) core labor standards, and we have confirmed our support for the UN Global Compact and principles on human rights, labor, the environment and anti-corruption. Colgate also is a member of

the Consumer Goods Forum (CGF), and participates in the Forum's Human Rights Coalition. The Company also supports the Forum's Social Resolution on Forced Labor and 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 seeks to work with business partners who share our commitment to universal human rights. Indeed, Colgate continues to conduct transformational projects and capacity building activities with suppliers, including support of the Earthworm Foundation's Indonesia landscape initiative, the Centre of Social Excellence (CSE) and other collaborations with suppliers such as Business for Social Responsibility (BSR) with Wilmar.

### ***Our Policies***

Some of our policies that address modern slavery, either directly or indirectly, are discussed below.

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

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

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

#### **Third Party Code of Conduct**

Colgate's Third Party Code of Conduct sets the Company's expectations for suppliers and business partners in a number of critical areas, including labor practices and universal human rights, 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 Code is provided to suppliers and business partners, and Colgate's contracts and purchase orders typically require suppliers to abide by the Code's standards or suppliers' comparable code standards, including applicable labor and equal employment laws. Certain suppliers are also required to acknowledge the Code's requirements via our online supplier portal.

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

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

### Additional Policies

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

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

Our Policies are publicly available on the Colgate website: <https://www.colgatepalmolive.com/en-us/core-values/sustainability/people>.

### ***Human Rights Strategy***

Through the development of our human rights strategy, we identified salient issues (which are stated below) and the groups most vulnerable to human rights abuses, including modern slavery. These groups include individuals working in “high risk” geographies or industry sectors, particularly where migrant or temporary workers are utilized. Modern slavery is an inherent risk in the supply chains of fast moving consumer goods. Particular commodities of focus in our industries include palm oil, soy, pulp & paper and beef tallow. As a large company with a robust human resources function and internal reporting mechanisms, we believe the risk of modern slavery in our own operations is negligible. Where risks exist, they exist 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 modern slavery risks in our supply chains.

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



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

### Freedom of Association

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

### Forced Labor

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

### Child Labor

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

### Health and Safety

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

### Working Hours and Wages

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

### Harassment

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

### Land Use Rights

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

### Diversity and Inclusion

Colgate strives to ensure our organization reflects the diversity of our consumers. We are committed to providing equal opportunity for all employees at all levels regardless of race, color, religion, sex, national

origin, citizenship, ethnicity, age, disability, marital status, veteran status, sexual orientation, gender identity or any other characteristic protected by law in the terms or conditions of employment. This includes but is not limited to recruitment, hiring, promotion, transfer, compensation, training, demotion or layoff. Colgate seeks to work with suppliers who promote this standard.

### ***Key Collaborations***

Eliminating modern slavery in supply chains is beyond the capabilities of any single company. We therefore work extensively with other stakeholders, including governments, workers' organizations, NGO's and other stakeholders to address this issue. Examples are discussed below.

#### **AIM-PROGRESS**

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

#### **Consumer Goods Forum**

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

#### **Earthworm Foundation (formerly known as The Forest Trust)**

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

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

In addition to the policies and practices discussed above, to identify, assess and mitigate modern slavery risks in both our business and supply chains, we engage in risk assessments, utilize external audits and, if there is non-conformance with our requirements, require implementation of a corrective action plan. 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.

#### Our Own Operations

We have over the last five years completed risk assessments at 96% of Colgate-Palmolive manufacturing facilities and conducted social compliance audits using the Sedex Members Ethical Trade Audit (SMETA) protocol at 93% of our manufacturing facilities operating in countries identified as high-risk according to Verisk-Maplecroft global risk indices on labor practices, human rights, worker health & safety and environmental management. Where areas of noncompliance are identified, a corrective and preventive action plan is implemented. Findings are verified as closed by third-party verification.

#### Our Third Party Business Partners

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

Colgate's SRSA program requires selected suppliers and business partners to complete a self-assessment focused on labor practices and human rights, among other things. Risk factors considered in the selection of suppliers to participate in the SRSA program include: geographic risks, Colgate's in-country knowledge, industry-associated risks and criticality to our operations. Through the use of a supplier risk assessment scorecard, selected suppliers and business partners are scored against critical risk factors to determine the need to conduct a compliance audit. When a supplier is assessed as high risk, a third-party audit of their facility is required. Audits are both announced and unannounced. In 2020, 145 suppliers completed self-assessments and 97 audits were completed.

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

If any areas of noncompliance are detected as a result of a SMETA audit, a corrective action plan is developed. We then work with the supplier to ensure the audit findings are remedied on the timetable established. The remediation of all areas of noncompliance is independently verified. If a supplier is unable or unwilling to implement the corrective action plan, Colgate may terminate the business relationship.

At the end of 2020, there were approximately 640 suppliers and service providers in the Sedex program and 36% had conducted a SMETA social compliance audit. According to information made available by Sedex, the most frequent areas of noncompliance identified during audits relate to worker health and safety, working hours and management systems.

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

Colgate also conducts forced labor risk assessments specifically for third party labor providers in our operations. This process was implemented in Asia, and we plan to expand the process for Africa-Eurasia, Middle East and Latin America regions.

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

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

#### **Reporting & Remediating Grievances**

The Colgate Ethics Line provides a means for employees and external parties to ask questions and obtain guidance or report any suspected violations of the Code of Conduct. We work to create a workplace free of inappropriate or unlawful behavior in which people are encouraged to share their concerns with the Company without fear of retaliation. Consequently, no adverse action will be taken against any employee, former employee, agent or third party for complaining about, reporting, participating in or assisting in the investigation of a suspected violation of the Company's Code of Conduct, Company policy or applicable law.

Colgate investigates all potential Code of Conduct violations. 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 in Asia, 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.

#### **Actions to Remedy**

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

### ***Training***

Colgate requires that 100% of salaried and clerical employees complete the 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. The Code of Conduct training reinforces Colgate's commitment to, among other things, respecting workers' human rights and fair labor practices. Training is linked to compensation for certain employee populations. In addition to training, the Company engages key internal stakeholders and senior leadership in raising awareness to the issue and indicators of forced labor.

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

Colgate also participates in supplier capacity building sessions through the AIM-PROGRESS forum that are designed to improve suppliers' social and environmental performance. The sessions explain the responsible sourcing assessment process and prepare suppliers for assessments and audits of their

facilities. We have participated in events in Latin America and North America. In addition, Colgate from time to time conducts similar independent responsible sourcing training events for our suppliers.

A handwritten signature in black ink, appearing to read 'Ann Tracy', with a stylized, flowing script.

Ann Tracy  
Chief Sustainability Officer  
Colgate-Palmolive Company

## **Modern Slavery Act Approvals**

### UK Modern Slavery Act

Hill's Pet Nutrition Limited ("Hill's") and Colgate-Palmolive (U.K.) Ltd ("C-P UK" and, together with Hill's, the "Colgate-Palmolive UK Entities") are required to submit a modern slavery statement pursuant to the Modern Slavery Act (2015). For purposes of compliance with that Act, this Statement was approved by the boards of directors of each of the Colgate-Palmolive UK Entities on July 23,, 2021, and signed by the undersigned, who are directors of each such entity, on July 26, 2021.

The Colgate-Palmolive UK Entities have operations throughout the UK and are indirectly wholly-owned by Colgate-Palmolive Company. Hill's had 67 employees and C-P UK had 157 employees as of 31 December, 2020. The C-P UK Entities own a number of entities, in the UK and internationally.

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

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

*Claire Towers*

Claire Towers (Jul 26, 2021 16:27 GMT+1)

**Claire Towers, General Manager**

**Hill's Pet Nutrition Limited**

*Taylor Gordy*

Taylor Gordy (Jul 26, 2021 15:53 GMT+1)

**Taylor Gordy, Vice President and General Manager**

**Colgate-Palmolive UK Ltd**