



COLGATE-PALMOLIVE (INDIA) LIMITED

RECORDS RETENTION POLICY

1.0 Purpose

This Records Management Policy (Policy) establishes general guidelines for retaining, preserving, deleting and, when appropriate, disposing of Records of Colgate-Palmolive (India) Limited ('Company' or 'Colgate') The Policy applies to all Colgate Records regardless of media or format and it includes both tangible (i.e. paper) and electronic (i.e., digitally created and/or cloud-based business documents) Records.

2.0 Introduction

Colgate is committed to a Policy that meets all applicable legal and regulatory requirements; satisfies the information retention needs of our business; and ensures that outdated or unnecessary Records (and non-Records) are appropriately discarded. The appropriate management, protection, retention and disposition of Records are key facts in assuring their integrity and evidentiary value in support of the Company's business activities.

The Indian regulations require that Colgate maintain certain types of Records for particular periods. Failure to comply with these requirements could subject the Company to significant fines and other penalties for improperly handling, preserving and / or disposing of relevant Records. Additionally, storing Records longer than required can expose the Company to unnecessary risks and cost, including the substantial costs of storing and subsequently searching through voluminous outdated Records.

To assist Colgate people in properly managing the Company's business Records, Colgate has created a Records **retention schedule** that provides specific guidance as to how long Colgate's official Records need to be kept.

3.0 Definitions

Colgate: Colgate means Colgate-Palmolive (India) Limited

Record: Any information (electronic or paper), created, received and/or maintained by Colgate or its employees/officers/directors/agents/contractors/consultants as evidence of Colgate's business activities. (Examples include: paper documents, electronic presentations, emails, spreadsheets, databases or microfilm)

Active Records: Records that are used frequently and support open and in-process business activities.

Examples of Active Records include: Open invoices, current contracts, current Personnel files, laboratory notebooks related to current technologies, processes and products.

Inactive Records: Records that are no longer used regularly. They are related to closed or completed business activities. Inactive Records that are not subject to a Litigation Hold do not need to be retained and should be deleted or destroyed as set forth in the Records Retention Schedule.

Examples of Inactive Records include: paid invoices, expired contracts, and Personnel files of former employees.

Non-Records: Any information, material or documents that do not relate to or reflect Colgate's business activities or legal obligations. Non-Records are not retained and should be destroyed as soon as possible. (Examples include: non-business personal notes, news alerts and casual e-mail correspondence)

Official Records: Complete and final Records that must be kept for a certain period of time according to the Records retention schedule. Official Records provide evidence of Colgate's business activities or legal obligations. (Examples include: original licenses, executed contracts, statutory registers etc. reflecting Colgate's business activities)

Records retention schedule: A document that provides specific guidance as to how long Colgate's Official Records need to be maintained as per Annexure 1 of this Policy.

Litigation hold: The procedure used to temporarily cease destruction of certain groups of Records, even if they are eligible for destruction under the Global Records Management Program.

Records coordinator: A Colgate employee who is assigned from time to time to assist in implementing this Policy.

4.0 Scope

This policy applies in India to:

- Any and all Records created or received in connection with Colgate operations, regardless of the media or format (e.g. electronic, email, imaged, paper, etc.).
- All physical, digital and/or cloud-based locations where Colgate Records are maintained.
- All firms and individuals acting on behalf of Colgate, including employees, contractors, business units, entities/ affiliates and third- parties who/that create, receive, manage or use Colgate Record(s).

5.0 Roles and responsibilities

5.1 Colgate employees are responsible for the proper management of Company Records in their possession and control. Specific responsibilities include:

- Creating, receiving and managing Records as part of their daily work according to established policies and procedures.

- Assuring that official Records are properly maintained and in Colgate databases according to the Company's Records retention schedule or, if transferred to off-site storage are properly indexed and classified according to the Company's Records retention schedule.
- Disposing of Records according to the Records Retention Schedule, unless subject to a Litigation Hold.

5.2 The head of each business unit is accountable for ensuring that this Policy is implemented at all levels of the function department, including:

- Determining inactive cases and destroying the same, except when they are subject to Litigation Hold.
- Ensuring Policy implementation and compliance by Colgate employees, temporary workers and third- party contractors.
- Assigning one or more Records coordinators for the function or department.

5.3 The Colgate Legal Department in consultation with the Global Legal Organization is responsible for:

- Developing, issuing and amending this Policy.
- Authorizing suspension of the routine destruction of Records by issuing Litigation holds.
- Authorizing the release of Litigation holds.

5.4 The Colgate Information Technology Department in consultation with the Global Information Technology Department (GIT) is responsible for

- Assisting with the application and removal of Litigation holds on electronic Records.
- Assessing current system capabilities to comply with the Global Records Management Program.
- Evaluating any new business applications, software or upgrades to technology for the ability to support compliance with the Global Records Management Program, including the Records retention schedule.

5.5 Records Co-coordinators are responsible for:

- Assisting the implementation of this Policy in their respective departments and/ or functions.
- Acting as a liaison between Colgate and the Global Information Technology and the Global Legal Organization on Records management issues.
- Coordinating departmental/ function access to off-site Records storage and associated Records Management activities.

5.6 The Internal Auditor of Colgate is responsible for auditing compliance of this Policy vis a vis Global Records Management Program.

6.0 Ownership of Company Records

Colgate owns all Records created, received and/or used in the course of conducting Colgate business. All Records pertaining to Colgate's business, whether physical, digital or cloud-based, no matter where they are located, are considered Colgate property. These Records should not be used for personal or any other private purpose or for the benefit of any third party.

All Records located in any Colgate facility, or in any facility managed by a third party on behalf of Colgate, are Company property and must be preserved in accordance with this policy and Global Records Management Program. Third parties working on behalf of Colgate must return originals and all copies of Colgate Records upon the termination of the business relationship or otherwise upon Colgate's request.

Additionally, Colgate Records should be treated as confidential and should not be disclosed outside of Colgate, other than on a need to know basis or with the prior approval of a Leadership Team member or above.

7.0 Maintain and Use

7.1 Retention

Colgate's Records retention schedule is the only retention schedule authorized for Company use. The Records retention schedule broadly identifies the types of Records and define how long they need to be retained, based upon their business, legal, compliance, operational and/or contend use to the Company. Business units and functional departments must consult with the Colgate legal department for any amendments to or variation from the Records retention schedule.

7.2 Litigation Hold

A Litigation hold suspends the Records retention schedule under special circumstances, including litigation, regulatory inspections, government investigations, audits or other actions that requires the retention, preservation, and/or collection of all relevant Records (regardless of storage medium or physical location) and non-records (regardless of storage medium or physical location) including Records otherwise eligible for destruction.

Colgate legal department is authorized to issue or release a litigation hold. The Colgate legal department shall maintain a Record of all Litigation hold orders.

7.3 Storage

Records will be stored to ensure their protection, usability and integrity for as long as they are needed by the Company as defined by the Records retention schedule or a valid Litigation hold notice. Emails and Google chats will be stored automatically according to the automatic retention limits set in Google Workspace by GIT.

When there is a justified business reason to remove Records from Company premises, good business practices to safeguard confidentiality and applicable Global Records Management Program policies must be followed.

Colgate employees must consult the Records Retention Schedule for the appropriate retention period for all other Records in order to store such Records in compliance with the Records Retention Schedule.

7.4 Archival of the correspondence to the Stock Exchanges

The Company shall disclose on its website all such events or information which has been disclosed to stock exchange(s) under the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, and such disclosures shall be hosted on the website of the Company for a minimum period of five years and thereafter as per Schedule II to this Policy.

7.5 Security and Confidentiality

All employees and third parties must adhere to Company policy as contained in the Company's code of conduct in order to maintain the security and confidentiality of Colgate Records. All Records are to be stored in safe and secure locations and protected from environment or other potential harm.

Records created, received or maintained by Colgate are generally deemed proprietary and should be circulated within the Company only when there is a sound business reason to do so. Access to and sharing of Records and information shall be limited to Colgate employees; authorized third parties; and temporary employees under contact to Colgate who have a business need for access. Theft, misappropriation of Records or giving access to another person who is not authorized to have access to Records, is strictly prohibited.

7.6 Records Destruction

Official Records that have met Colgate's Records retention schedule requirements and that are not subject to any Litigation holds are eligible for destruction.



Premature destruction of official Records is expressly prohibited. Any intentional premature destruction of Records will be taken very seriously and may result in disciplinary action, up to and including termination of employment and/or possible civil and criminal liability, subject to local law.

8.0 Other Policies

Employees and third parties should review the following policies and documentation for additional information on Colgate's policies regarding Company Records:

- Code of Conduct
- Third Party Code of Conduct
- Global Business Practices Guidelines

9.0 Amendments

The Managing Director or Whole-time Directors in consultation with the Global Legal Organization shall have the authority to amend the contents of the Policy, whenever necessary, to bring them within the provisions of the regulatory framework in India.

10.0 Display of the Policy

This Policy shall be hosted on the website of the Company and the address of such web link shall be provided in the Annual Report of the Company.

Sr. No.	Name of the document/Report/File	Retention Period (in years)
1.	Human Resources <ul style="list-style-type: none"> ● Personnel Records ● Stock Option Plan Participation ● Employee Recruitment and Selection ● Leave of Absence ● Training Attendance verification and certification ● Sexual Harassment Records 	16 7 3 7 7 7
2.	Employee Relation (includes company communication, employee announcements, Newsletters)	6
3.	Payroll Accounting	8
4.	Insurance Policies and Claims	6
5.	Provident Fund / Gratuity / Superannuation	Permanent
6.	Clinical Trial study reports	10
7.	Technical Research and Claims Substantiation	15
8.	Records on Quality Assurance	10
9.	Environmental, Occupational Health and Safety (EOHS)	Permanent
10.	Internal Audit Records	8
11.	Consumer Affairs <ul style="list-style-type: none"> ● Adverse Events ● Complaint sample reports ● Consumer Feedback 	10 15 3
12.	Internal Communications	10
13.	Legal <ul style="list-style-type: none"> ● Board, Board Committee and General Meeting Minutes ● Property Documents ● Contracts and Agreements ● Agreements pertaining to Technology / Royalty/ Contract Manufacturers/ Critical Suppliers ● Government Compliance and Reporting ● Incorporation Charters 	Permanent Permanent 7 Permanent 15 Permanent

	<ul style="list-style-type: none"> ● Real Estate Contracts and Agreements ● Legal Opinions ● Licenses, Permits and Certificates ● Mergers and Acquisitions ● Annual Reports ● Correspondences to the Stock Exchanges 	15 Permanent Permanent 15 15 8
14.	Marketing <ul style="list-style-type: none"> ● Product Design and Artwork ● Product Lifecycle and Capability Development ● Product Promotional Materials 	5 10 10
15.	Customer Development <ul style="list-style-type: none"> ● Product Instruction Manuals ● Product description and pricing ● Sales and Merchandising Communications 	15 7 6
16.	Supply Chain And Logistics <ul style="list-style-type: none"> ● Inventory Management ● Shipping And Receiving <ul style="list-style-type: none"> - Hazardous Material - Non-hazardous Material 	3 15 6
17.	Financial Accounting Records	8
18.	Taxation related documents	10
19.	Treasury	6

Schedule II

Events/Notices/Statements/Report Results	Period for which it will be in Archive on the website of the Company
Disclosures of material events & information	3 years
Annual Report	3 years
Financial Statements , quarterly results, quarterly, half yearly submissions to stock exchanges, certificates, Reports if any	1 year
Notices/intimation to Stock exchanges regarding (Board Meeting, Annual general meeting, Extra ordinary general meeting, record date, postal ballot and any other intimation)	1 year
Outcome of Meetings (Board Meetings)	1 year
Analyst presentations	1 year
Voting results	1 year