



**COLGATE-PALMOLIVE (INDIA) LIMITED**

**HUMAN RIGHTS POLICY**



## Who we are

Colgate-Palmolive (India) Limited (“Colgate”, “We” or the “Company”) is the leading oral care company in India. Being a caring, innovative growth company, our purpose is to reimagine a healthier future for all people, their pets and our planet. This shared commitment to hold the highest ethical standards has guided us on the path to success and created an illustrious legacy of over 85 years in India.

## Our Commitment

Colgate globally 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 is also a member of the Consumer Goods Forum (CGF), and participates in the Forum’s Human Rights Coalition, supporting its Social Resolution on Forced Labor and 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.

We also comply with human rights laws applicable in India while adhering to international human rights to the greatest extent possible, drawing guidance from the [National Guidelines on Responsible Business Conduct \(NGRBC\)](#) released by the Ministry of Corporate Affairs.

Colgate strives to become a responsible corporate citizen with [Sustainability policies](#) and its [Code of Conduct](#). We keep our business partners accountable and would never knowingly enter into a partnership where we identify major human rights concerns. However, if we find irregularities, we actively engage with them to resolve and mitigate any adverse impact.

We truly believe that ‘Everyone Deserves a Future They Can Smile About’ and have always been at the forefront of advocating oral health in India with the help of awareness campaigns and free dental checkup camps. We contribute to a positive human rights environment through our digital and financial literacy programs to upskill women from underserved communities. Being market leaders in the oral care category, we consider it our moral duty to create a positive social impact through each part of our business. In this way, we can keep India smiling.

## Our Human Rights elements

The human rights elements that we seek to address through this policy are:

1. **Freedom of Association**: Colgate respects employees’ lawful freedom of association by recognising all legal rights to organize and collectively bargain.
2. **Forced Labour**: Colgate will not use forced labor within our own operations. We strive to eradicate forced labor from our value chains and expect our suppliers to do the same. We believe

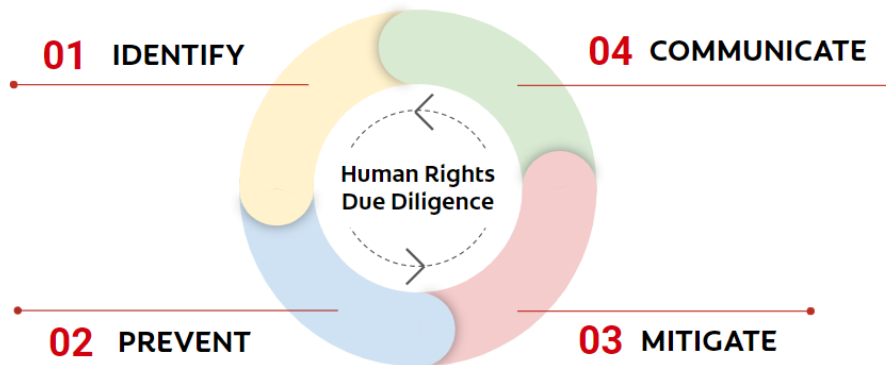
that every worker should have freedom of movement, no worker should pay for a job, and no worker should be indebted or coerced to work. We also expect that fees and costs associated with recruitment and employment be paid by the employer, not the employee. Moreover, it is Colgate's policy not to work with any supplier or contractor known to use forced labor.

3. **Child Labour**: Colgate also will not use child labor within our own operations. While the Child Labour (Prohibition and Regulation) Act prohibits any child (below the age of 14 years) to be employed in any occupation and prohibits adolescents (between 14 and 18 years) to be engaged in any hazardous occupations and processes, in no event will we knowingly employ anyone younger than eighteen (18) years of age, even if the legal working age in the jurisdiction is lower. Moreover, it is Colgate's policy not to work with any supplier or contractor known to operate with child labor.
4. **Diversity and Inclusion**: We strongly believe in creating a diverse work environment where people feel that they belong; where they can be their authentic selves, feel treated with respect and have the necessary support to impact business in a meaningful way. We are sensitive to the needs of vulnerable and marginalized groups in our society and also continuously strive to make our workplaces equipped for the needs of specially abled people. We maintain an inclusive work environment and achieve excellence by attracting and retaining people of all backgrounds. We expect all employees to maintain our commitment to a culture where respectful behavior is the norm. This commitment is mentioned in our global 'Diversity, Equity & Inclusion' ("[DE&I](#)") report, for which We have set up a DE&I council in India which embodies this commitment. The goal is to translate ideas into action and help people to contribute openly, learn and thrive. This is how we grow the 'Power of We'.
5. **Discrimination & Harassment**: 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. Moreover, we prohibit sexual harassment or any form of harassment of our employees by any person in the workplace or while conducting Company business.
6. **Health & 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, respecting the health and safety of our workers. Suppliers who do business with Colgate are encouraged to maintain a focus on health and safety standards 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 as well as Colgate safety standards.
7. **Wages and working hours**: 100% of our employees are paid at least equal to or above the statutory minimum wage. Colgate complies with legally mandated work hours in accordance with

local laws. Colgate expects our suppliers to comply with legally mandated wage and overtime compensation, holidays and working hour requirements in accordance with local laws.

## **Our Human Rights Framework**

Human Rights Due Diligence is at the core of the framework. It guides our action plans to make business practices even more ethical and responsible. Our aim is to strengthen the due diligence process both in our direct operations and across the value chain. We follow a 4 step process- Identify, Prevent, Mitigate and Communicate.



The Human rights framework is implemented according to the steps mentioned below:

**Identify:** We identify and assess human rights 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, we implement a corrective action plan. 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.

**Prevent:** Colgate requires that 100% of its employees complete the Code of Conduct regularly on a periodic basis. The training reinforces Colgate’s commitment to, among other things, respecting workers’ human rights and fair labor practices. In addition to training, the Company engages key internal stakeholders and senior leadership in raising awareness about human rights issues. Colgate also participates in supplier capacity building sessions through the AIM-PROGRESS forum that are designed to improve suppliers’ social and environmental performance.

**Mitigate:** The Colgate Ethics Line provides a means for everyone to ask questions and obtain guidance or report any suspected violations of the Code of Conduct. Any employee can report the information to the manager, Human Resources, Global Ethics and Compliance or the Global Legal Organization through a dedicated email, web tool, internal helpline and CP mobile app. 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’s Human Rights policy or applicable law, except in respect of false or malicious complaints. Colgate investigates all

potential Code of Conduct violations. After an investigation has been completed, if the allegations are substantiated, appropriate remedial action is taken.

**Communicate:** We believe in reporting our progress transparently to inspire collective action towards a positive human rights environment. We listen to what is happening globally and in society and bring the best practices to our Company, as this only strengthens our efforts. So, we engage with thought leaders and industry forums to help us in our human rights journey.

## **Policy Implementation**

This policy is applicable to all locations of Colgate-Palmolive (India) Limited which include the Head office, our branch offices and all our manufacturing plants. Needless to say, our employees are obliged to respect human rights in business operations. We also encourage our business partners to share a similar commitment to fundamental human rights by adopting this policy.

As far as the governance mechanism is concerned, functional heads who constitute the leadership team in the company, review human rights compliance from time to time. There is a Human Rights Leader from the Human Resources team who is centrally responsible for driving the agenda and addressing potential violations or issues caused or contributed to by the company and/ or of a known violation by a partner/supplier. Finally, we have Human Rights Champions who lead on-ground implementation and relay back information from the different operating locations.



The Copy of this policy is to be made part of all the Company' and shall be available on Colgate's intranet portal and on the website of the Company.