

# The **CODE OF CONDUCT** Hotline



*Call toll free – 24 hour access*

**1 800 778 6080**

*E-mail*

***business\_practices@colpal.com***

*Call collect or reverse charges worldwide*

**212 310 2330**

*Fax*

**212 310 3745**

## **Colgate-Palmolive Code of Conduct Hotline**

Introduced in 1995, the Colgate Code of Conduct Hotline helps ensure that we conduct Colgate business in accordance with the highest ethical standards. Developed to address issues of possible unethical behavior, the Hotline can also help address issues that involve our Principles of Managing with Respect and our core values of Caring, Global Teamwork, and Continuous Improvement.

Sometimes you may have a question about something in the Code or just want guidance on “doing the right thing.” If that’s the case, simply call or write the Hotline with your question. If an answer is not immediately available, you will be contacted as soon as possible following your call, e-mail, fax or letter.

As always, you are encouraged to resolve issues through your local management team whenever possible. When that is not possible, or concerns exist about doing so, you should make use of the Hotline.

The Hotline can be reached from anywhere in the world by telephone, fax, e-mail or letter. You may provide your name or other identifying information, or you may contact the Hotline anonymously. To contact the Hotline anonymously, simply call the applicable telephone number listed here and indicate you wish to report or discuss an issue anonymously. You may also write to the address provided in this brochure. At present, it is not possible to use e-mail for anonymous communications.

## *If I contact the Hotline, to report an issue, what happens next?*

If you call the Hotline, the person answering your call will ask the reason for your call and for as much information as you can provide. You should be prepared to be as specific as possible. This will speed up the investigation process. Once you have reported your concern, an investigator will be assigned to look into the issue. You will be reminded of the need for confidentiality and that no one may retaliate against you for the good faith reporting of an incident, filing of a claim or for participating in an investigation. Unless you have chosen to remain anonymous, you may be contacted by the investigator for additional information. Once the investigation has been completed, the results and recommendations are reviewed by a Colgate senior manager, in consultation with others, and finalized. The results and recommendations are then discussed with the appropriate people and implemented.

## *Are there special procedures for handling accounting issues?*

You can report issues to Global Business Practices by contacting the Hotline or you can report them directly to the Board of Directors by sending an e-mail to: [directors@colpal.com](mailto:directors@colpal.com) or sending a letter to:

Colgate Directors  
c/o Office of the General Counsel  
300 Park Avenue, 11th Floor  
New York, NY 10022-7499

Any Code of Conduct related matters submitted to the above address will be automatically forwarded to all independent directors and copies will be provided to the Office of the General Counsel, Office of the Chairman, and Global Business Practices. Concerns and questions relating to accounting, internal accounting controls, financial policy, risk management or auditing matters are immediately brought to the attention of the Audit Committee and will be addressed in connection with Global Business Practices, as well as the Company's Internal Audit and Legal functions.

## *Who answers the Hotline?*

The Hotline is answered by a member of the Global Business Practices staff at 300 Park Avenue. If your call is outside of normal Park Avenue business hours, you may leave a message on the Hotline's confidential voicemail system.

## *What about confidentiality?*

We strive to maintain the confidentiality of Hotline reports. However, in limited circumstances, it may not be possible to guarantee absolute confidentiality. Sometimes in order to investigate a complaint, the reporting person's identity may be relevant. Sometimes the reporting person has discussed the issue with others before calling the Hotline and that friend or colleague may not hold a confidence. And sometimes, under very limited circumstances, the law may require the Company to reveal information acquired during an investigation. In all circumstances however, we will ensure that no one will be retaliated against for reporting an incident, filing a claim, or for participating in an investigation.

## *What if I don't have all the facts?*

Don't try to investigate a situation on your own. If you have enough information to reasonably suspect a problem, call the Hotline. The Company will look into the information you do provide, attempt to verify it and take appropriate action.

## *What are some of the things investigated by the Hotline?*

All potential violations of our Code of Conduct including:

- Any potential criminal conduct
- Improper financial or accounting practices
- Theft, bribes, kickbacks
- Harassment, including sexual
- Discrimination
- Unauthorized disclosure of Company trade secrets or proprietary information
- Improper sales practices
- Fraud (i.e. financial)
- Conflicts of Interest
- Company political contributions
- Insider trading
- Any action that could potentially compromise the safety or integrity of Colgate products
- Any action that could prove detrimental to the name and reputation of the Company

## *What if there is an emergency?*

Do not call the Hotline in the event of an emergency or crisis. For notification regarding an emergency situation, such as product tampering, crisis or any immediate risk to safety you should call Colgate's 24-hour Security Center at 212-310-3333 (call worldwide collect or reverse the charges).

***When in doubt, please call as the Code of Conduct Hotline is here to help.***

*You may contact Business Practices from any location through the 24-hour Hotline 1-800-778-6080 (United States) or 212-310-2330 (International) collect or reverse the charges, or through regular mail, e-mail or fax:*

***Global Business Practices***

***Colgate-Palmolive***

***300 Park Avenue, 15th Floor***

***New York, NY 10022***

***business\_practices@colpal.com***

***212-310-3745 (fax)***

# **COLGATE'S VALUES**

## **CARING**

*The Company cares about people: Colgate people, consumers, shareholders and business partners.*

*Colgate is committed to act with compassion, integrity and honesty in all situations, to listen with respect to others and to value differences. The Company is also committed to protecting the global environment and enhancing the communities where Colgate people live and work.*

## **GLOBAL TEAMWORK**

*All Colgate people are part of a global team, committed to working together across countries and throughout the world. Only by sharing ideas, technologies and talents can the Company achieve and sustain profitable growth.*

## **CONTINUOUS IMPROVEMENT**

*Colgate is committed to getting better every day in all it does, as individuals and as teams. By better understanding consumers' and customers' expectations and continuously working to innovate and improve products, services and processes, Colgate will "become the best."*

## **MANAGING WITH RESPECT**

### **FIVE STEPS TO LIVING OUR VALUES**

- 1. Communicate Effectively*
- 2. Give and Seek Feedback*
- 3. Value Unique Contributions*
- 4. Promote Teamwork*
- 5. Set the Example*