

# COLGATE PALMOLIVE CO

## **FORM SD** (Specialized Disclosure Report)

Filed 05/31/18

Address	300 PARK AVE NEW YORK, NY, 10022
Telephone	2123102000
CIK	0000021665
Symbol	CL
SIC Code	2844 - Perfumes, Cosmetics and Other Toilet Preparations
Industry	Personal Products
Sector	Consumer Non-Cyclicals
Fiscal Year	12/31

UNITED STATES  
SECURITIES AND EXCHANGE COMMISSION  
Washington, D.C. 20549

FORM SD

SPECIALIZED DISCLOSURE REPORT

COLGATE-PALMOLIVE COMPANY

(Exact name of the registrant as specified in its charter)

Delaware  
(State or Other Jurisdiction  
of Incorporation)

1-644  
(Commission  
File Number)

13-1815595  
(IRS Employer  
Identification No.)

300 Park Avenue, New York, NY  
(Address of Principal Executive Offices)

10022  
(Zip Code)

Henning I. Jakobsen  
Chief Financial Officer  
(212) 310-2000  
(Name and telephone number, including area code, of the  
person to contact in connection with this report.)

Check the appropriate box to indicate the rule pursuant to which this form is being filed, and provide the period to which the information in this form applies:

Rule 13p-1 under the Securities Exchange Act (17 CFR 240.13p-1) for the reporting period from January 1 to December 31, 2017.

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## **Section 1 – Conflict Minerals Disclosure**

### **Item 1.01 Conflict Minerals Disclosure and Report**

Colgate-Palmolive Company (the “Company”) has filed this Specialized Disclosure Form (Form SD) (including the Conflict Minerals Report) for the year ended December 31, 2017 to comply with Rule 13p-1 under the Securities Exchange Act of 1934 relating to “conflict minerals.” This report is also available in the “For Investors” section of the Company’s website at <https://www.colgatepalmolive.com>. The reference to the Company’s website is provided for convenience only, and its contents are not incorporated by reference into this Specialized Disclosure Form (Form SD) nor deemed filed with the U.S. Securities and Exchange Commission.

### **Item 1.02 Exhibit**

The Company’s Conflict Minerals Report for the year ended December 31, 2017 is filed as Exhibit 1.01 of this Specialized Disclosure Form (Form SD).

## **Section 2 – Exhibits**

### **Item 2.01 Exhibits**

Exhibit 1.01 [Conflict Minerals Report of Colgate-Palmolive Company, as required by Items 1.01 and 1.02 of this Specialized Disclosure Form \(Form SD\).](#)

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**SIGNATURE**

Pursuant to the requirements of the Securities Exchange Act of 1934, the registrant has duly caused this report to be signed on its behalf by the undersigned hereunto duly authorized.

**COLGATE-PALMOLIVE COMPANY**

Date: May 31, 2018

By: /s/ Henning I. Jakobsen  
Name: Henning I. Jakobsen  
Title: Chief Financial Officer

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**Colgate-Palmolive Company**  
**Conflict Minerals Report**  
**for the Year Ended December 31, 2017**

This Conflict Minerals Report for the year ended December 31, 2017 is presented to comply with Rule 13p-1 under the Securities Exchange Act of 1934 relating to “conflict minerals” (the “Rule”). For purposes of the Rule, “conflict minerals” are limited to cassiterite, columbite-tantalite, wolframite and gold, including their derivatives, which are limited to tin, tantalum and tungsten.

**Introduction**

Colgate-Palmolive Company (the “Company”) is a leading consumer products company whose products are marketed in over 200 countries and territories throughout the world. As a result of the Company’s global operations, its supply chain sources materials, finished products and services globally and from a large number of suppliers. The Company does not typically source any minerals, including conflict minerals, directly from mines, smelters or refiners and is several supply chain levels removed from these market activities.

The Company manufactures and markets a wide array of oral care, personal care, home care and pet nutrition products. As required by the Rule, the Company has conducted a review of its products to determine whether they contain conflict minerals that are necessary to their functionality or production. Only a small number of the Company’s products were determined to contain necessary conflict minerals. The Company determined that necessary conflict minerals were contained in components of its electric and battery toothbrushes and its whitening tray devices.

**Reasonable Country of Origin Inquiry**

As required by the Rule, the Company conducted a reasonable country of origin inquiry into its supply chain to determine whether any of the conflict minerals contained in its products originated in the Democratic Republic of Congo or adjoining countries (collectively, the “Covered Countries”).

*Supplier Survey*

The Company identified its materials and products that contain necessary conflict minerals by reviewing its reasonable country of origin inquiry survey results from the prior year, searching its product formula database and interviewing internal product ingredient experts. The Company requested that each of the suppliers of these materials and/or products complete the Conflict Minerals Reporting Template developed by the Responsible Minerals Initiative (“RMI”) (formerly known as the Conflict-Free Sourcing Initiative (“CFSI”)). Responses were reviewed for consistency and completeness, and follow-up inquiries were conducted if necessary. The results of the supplier survey were discussed with members of senior management.

*Results of Survey*

The Company received responses from 100% of the surveyed suppliers. Two of the surveyed suppliers indicated that smelters in their supply chain source conflict minerals from the Covered Countries; however, one such supplier indicated that 100% of the conflict minerals contained in its product were

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from recycled or scrap sources. None of the other suppliers indicated that the smelters in their supply chain source conflict minerals from the Covered Countries. As of May 15, 2018, all of the smelters identified by the surveyed suppliers are considered “compliant” under the RMI’s Responsible Minerals Assurance Process (“RMAP” (formerly known as CFSI’s Conflict-Free Smelter Program assessment protocols)), meaning they either had a currently valid audit or a reaudit in progress.

### **Due Diligence Process**

The Company has exercised due diligence on its supply chain, with the goal of determining that the necessary conflict minerals contained in its products did not directly or indirectly finance or benefit armed groups in the Covered Countries. The Company designed its due diligence process to comply in all substantive respects to the framework set forth in the Organization for Economic Cooperation and Development Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (the “OECD Framework”).

The Company performed the following due diligence steps:

#### **(1) Establish strong company management systems**

- The Company has adopted a conflict minerals policy, which includes information on how to contact the Company for further information and/or to report concerns. The policy is available in the “Sustainability” section of the Company’s website at <https://www.colgatepalmolive.com>.
- The Company has incorporated its conflict minerals policy into its Third Party Code of Conduct, which conveys the Company’s expectations regarding ethical conduct to all third parties with whom the Company does business.
- The Company has established a team comprised of employees from its procurement, legal and sustainability functions to design and implement its conflict minerals compliance efforts with senior executive level support and oversight.
- The Company has provided background information and training on the Rule to employees involved in its conflict minerals compliance efforts.
- The Company requested relevant suppliers to identify the smelters of the conflict minerals in their materials or products.
- The Company requires that conflict materials documentation be retained for six years pursuant to the Company’s document retention policy.

#### **(2) Identify and assess risks in the supply chain**

- As described above under “Reasonable Country of Origin Inquiry,” in order to determine the mine or location of origin of the conflict minerals in the Company’s supply chain with the greatest possible specificity, the Company requested its relevant suppliers to complete the Conflict Minerals Reporting Template developed by RMI.
  - The Company reviewed the supplier responses for inconsistent and/or incomplete responses that might indicate a potential risk.
  - The Company compared the smelters identified by its suppliers against the RMAP’s lists of compliant and active smelters.
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### **(3) Design and implement a strategy to respond to identified risks**

The Company implemented a risk management plan designed to identify, monitor and mitigate identified risks. Elements of the plan included:

- providing updates to senior management in the finance, supply chain and legal functions;
- sending corrective action follow-up notices to suppliers who provided incomplete and/or inconsistent responses to the Company's information requests;
- informing relevant suppliers about the Company's conflict minerals policy; and
- encouraging suppliers who provided inconsistent or incomplete responses to improve their due diligence practices in accordance with the Company's conflict minerals policy.

### **(4) Carry out independent third-party audit of supply chain due diligence at identified points in the supply chain**

The Company does not conduct audits of smelters. The Company relies on the RMAP to audit smelters that may be in the Company's supply chain.

### **(5) Report on supply chain due diligence**

This Conflict Minerals Report and the Company's Specialized Disclosure Report (Form SD) are available in the "For Investors" section of the Company's website at <https://www.colgatepalmolive.com>. The reference to the Company's website is provided for convenience only, and its contents are not incorporated by reference into this Conflict Minerals Report nor deemed filed with the U.S. Securities and Exchange Commission.

### **Smelters**

Attached as an Annex to this Conflict Minerals Report is an aggregated list of the smelters reported to the Company by its suppliers of conflict minerals. Some of the suppliers that provided this information did so either on a company or division level, and not in relation to specific products. Therefore, the Company is unable to determine whether many of these smelters are actually in the Company's supply chain.

### **Ongoing Risk Mitigation Efforts**

The Company has implemented an ongoing risk mitigation plan that is intended to strengthen its supply chain due diligence capability and traceability with respect to conflict minerals and reduce the risk that the sourcing of any conflict minerals benefits armed groups in the Covered Countries. The Company's ongoing risk mitigation efforts include:

- incorporating supplier contract language and/or terms and conditions that require relevant suppliers to cooperate with the Company's conflict minerals compliance efforts;
  - continuing to engage with the Company's suppliers to further enhance their due diligence processes; and
  - sharing the Company's conflict minerals policy with suppliers.
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### **Cautionary Statement on Forward-Looking Statements**

This Conflict Minerals Report, including the description of the Company's ongoing risk mitigation efforts, contains forward-looking statements (as such term is defined in the Private Securities Litigation Reform Act of 1995 or by the Securities and Exchange Commission in its rules, regulations and releases). These statements are made on the basis of the Company's views and expectations as of this time and the Company undertakes no obligation to update these statements whether as a result of new information, future events or otherwise, except as required by law or by the rules and regulations of the Securities and Exchange Commission. The Company cautions investors that such forward-looking statements are not guarantees of future performance and that actual events or results may differ materially from those statements due to factors, such as the implementation of satisfactory traceability and other compliance measures by the Company's direct and indirect suppliers on a timely basis or at all, whether smelters and refiners and other market participants responsibly source conflict minerals, internal and external resource restraints, and political and regulatory developments, whether in the Covered Countries, the United States or elsewhere. For a description of certain factors that could cause the Company's future events or results to differ materially from those expressed in any forward-looking statement, please refer to the Company's filings with the Securities and Exchange Commission, including, without limitation, information under captions "Risk Factors" and "Cautionary Statement on Forward-Looking Statements" included in the Company's Annual Report on Form 10-K for the fiscal year ended December 31, 2017 and subsequent Quarterly Reports on Form 10-Q.

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**Annex  
Smelters**

<b>Metal</b>	<b>Smelter Name</b>	<b>RMI Smelter ID</b>	<b>Smelter Location</b>	<b>RMAP Status <sup>(1)</sup></b>
Tin	China Tin Group Co., Ltd.	CID001070	China	Compliant
Tin	CV United Smelting	CID000315	Indonesia	Compliant
Tin	EM Vinto	CID000438	Bolivia (Plurinational State of)	Compliant
Tin	Malaysia Smelting Corporation (MSC)	CID001105	Malaysia	Compliant
Tin	Metallo Belgium N.V.	CID002773	Belgium	Compliant
Tin	Mineração Taboca S.A.	CID001173	Brazil	Compliant
Tin	Minsur	CID001182	Peru	Compliant
Tin	Operaciones Metalurgical S.A.	CID001337	Bolivia (Plurinational State of)	Compliant
Tin	PT Inti Stania Prima	CID002530	Indonesia	Compliant
Tin	PT Mitra Stania Prima	CID001453	Indonesia	Compliant
Tin	PT Timah (Persero) Tbk Kundur	CID001477	Indonesia	Compliant
Tin	PT Timah (Persero) Tbk Mentok	CID001482	Indonesia	Compliant
Tin	PT Tommy Utama	CID001493	Indonesia	Compliant
Tin	PT Tinindo Inter Nusa	CID001490	Indonesia	Compliant
Tin	Thaisarco	CID001898	Thailand	Compliant
Tin	White Solder Metalurgia e Mineração Ltda.	CID002036	Brazil	Compliant
Tin	Yunnan Chengfeng Non-ferrous Metals Co., Ltd.	CID002158	China	Compliant
Tin	Yunnan Tin Group (Holding) Company Limited	CID002180	China	Compliant
Tin	CV Venus Inti Perkasa	CID002455	Indonesia	Compliant
Tin	PT Rajehan Ariq	CID002593	Indonesia	Compliant
Tin	PT Sukses Inti Makmur	CID002816	Indonesia	Compliant
Tantalum	Global Advanced Metals Aizu	CID002558	China	Compliant
Tantalum	Ningxia Orient Tantalum Industry Co., Ltd.	CID001277	Kazakhstan	Compliant
Tantalum	Ulba Metallurgical Plant JSC	CID001969	Japan	Compliant
Tungsten	Xiamen Tungsten (H.C.) Co., Ltd.	CID002320	China	Compliant
Tungsten	Xiamen Tungsten Co., Ltd.	CID002082	China	Compliant
Gold	Gold Refinery of Zijin Mining Group Co., Ltd.	CID002243	China	Compliant

(1) Smelters identified as “Compliant” are compliant with the RMAP assessment protocols (as of May 15, 2018) and include (i) smelters with currently valid audits and (ii) smelters with reaudits in progress.