



Environmental, Occupational Health and Safety Management System Gap Assessment Report and Equivalency Statement

Colgate - Palmolive Company

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Prepared for:

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1.0 INTRODUCTION

Colgate-Palmolive Company (Colgate) retained Apex Companies, LLC (Apex) to conduct a Gap Assessment of the current Environmental, Occupational Health and Safety Management System (EOHS) elements compared to the requirements outlined in the ISO 14001:2015 and ISO 45001:2018 standards for the corporate office located in Piscataway, New Jersey. Please note that the OHSAS 18001:2007 Standard was replaced with the publication of ISO 45001 on March 12, 2018. Apex completed the audit remotely rather than in person due to the safety restrictions from the COVID-19 pandemic as outlined in the Audit Methodology section of this report.

2.0 SCOPE OF WORK

The EOHS gap assessment was conducted by Anne Bevington, Apex National Practice Leader. The primary contacts during the audit were Mr. Marty Stern, Global Director EHS, along with support from Ms. Lauren Hall, EHS Systems Analyst.

The scope of the assessment included review of documentation for the current EOHS Management System, and interviews and question and answer sessions with Mr. Stern and Ms. Hall

The following records were requested by Apex for review:

- EOHS Management System Corporate Manual
- Minimum Safe Behaviors Standard
- Environmental, Health and Safety Policy; current and proposed updated Policy
- Colgate Sustainability Report
- Environmental Performance Metrics or Scorecards
- Incident Reporting and Management Procedure or Standard
- Emergency Response Standard
- EOHS Auditing Program
- Contractor Safety Standard
- Site Business Review
- Divisional Business Review

2.1 Assessment Criteria

Although Colgate is not currently ISO certified, Apex developed the gap assessment criteria based on the elements of the ISO 14001: 2015 and the ISO 45001:2018 standards and how they specifically relate to Colgate's operations. These ISO Standards are well known and implemented in many industries (about 350,000 ISO 14001 certificates exist around the world) and are routinely used to evaluate company-wide processes like Colgate's EOHS Management System.

The Gap Assessment Criteria is outlined below in Table 1.

Table 1: Assessment Criteria Based on ISO 14001:2015 and ISO 45001:2018 Standard Requirements

Clause	Title	Criteria
4	Understanding the organization and its context	Has Colgate identified external and internal issues that could affect the ability of the management system to fulfil company, stakeholder requirements and compliance obligations?
	Understanding the needs and expectations of interested parties	What processes does Colgate have to understand the needs/expectations of internal and external stakeholders, company and regulatory requirements?
5	Leadership	Is Colgate's Leadership demonstrating leadership and commitment for the EOHS Management System?
	Environmental, Health and Safety Policy	Does the facility have an EHS policy which includes a commitment to fulfil compliance and sets the framework for EOHS Goals and Objectives?
	Organizational Roles, Responsibilities and Authorities	Are roles, responsibilities and authorities clearly defined and understood at the company specific to EOHS management?
6	Planning	Has Colgate determined risks and opportunities associated with noncompliance with environmental and safety regulations?
	Risk Assessment/Environmental Aspects/Hazard Assessment	How does Colgate determine environmental aspects of its activities that it can control and those that it can influence, and their associated impacts, considering a life cycle perspective associated with noncompliance with environmental and safety regulations?
	Compliance Obligations	What processes does Colgate have to identify, assess and evaluate the applicable regulations
	Planning Action	Through its planning processes, how does Colgate take action to set goals and objectives and comply with regulations.?
	Company Objectives	How has Colgate established company objectives at relevant functions and levels, taking into account compliance with environmental, health and safety regulations and prioritizing risks?
	Planning Action to Achieve Environmental and Safety Objectives	What system does Colgate have in place to achieve its environmental and safety objectives,

Clause	Title	Criteria
7	Competence	How does Colgate ensure that those persons involved in complying with environmental, health and safety company requirements and applicable laws and regulations are competent?
	Awareness	Are those responsible for assuring compliance with stakeholder requirements and applicable laws and regulations aware of their duties and the implications of not complying?
	Communication	Does Colgate have processes to identify internal and external stakeholders with whom they must communicate regarding company requirements and applicable laws and regulations?
	Control of Documented Information	Does Colgate control documents and records associated with compliance with all applicable laws and regulations?
8	Operational Planning and Control	Does Colgate have documented operational control procedures in place to ensure that business activities are carried out in a way that ensures company policies and laws and regulations are being followed? b) Does Colgate have a Management of Change process to ensure continued compliance with company requirements and regulations for when changes occur within the business processes?
9	Monitoring, Measurement, Analysis and Evaluation	Does Colgate have processes to monitor, measure (e.g. testing, certifying), analyze and evaluate its compliance with regulations?
	Evaluation of Compliance	Does Colgate have a process to evaluate its compliance to company requirements and/or laws and regulations?
	Internal Audit	Does Colgate have an internal audit process which evaluates their EOHS Management System?
	Management Review	Does Colgate have a management review process which includes review of compliance with company requirements and laws and regulations?
10	Improvement - Nonconformity and Corrective Action	Does Colgate have a process for investigating root causes of nonconformities and addressing them through a corrective action system?
	Continual Improvement	Does Colgate demonstrate that it is actively working to improve its processes for complying with company requirements and applicable laws and regulations?



3.0 COLGATE CORPORATE EOHS MANAGEMENT SYSTEM

3.1 Company Management System Overview

The Colgate-Palmolive Company, based in Piscataway, New Jersey specializes in the manufacture of household consumer products such as soap, toothpaste and deodorant. Colgate has operations worldwide including manufacturing, research and development, warehousing and office locations.

The facility maintains a management system at the corporate location that integrates and sets the minimal requirements for environmental and occupational health and safety for all locations. Manufacturing sites are responsible for meeting the minimal management system requirements and have the flexibility to implement site-specific programs and procedures.

3.2 Best Practices and Continuous Improvements

The following Best Practices currently in place as part of the Colgate EOHS Management System or system improvements that have been recently implemented by Colgate were identified during the Gap Assessment. Best Practices and system improvements are processes or procedures that have shown favorable results and could be considered “Best in Class” compared to other industries.

- Colgate has procured an EOHS Management System Tool, GenSuite. This tool will be used to centrally manage many aspects of the system including: Compliance Calendars, Incident Tracking, Audit Management and Corrective Actions.
- Each site is staffed with an EHS professional or a designee with defined responsibility for EOHS.
- Colgate utilizes the Management of Change process defined as part of the Quality Management System.
- Key metrics both for environmental and safety performance are presented and integrated as part of business review meetings.

4.0 GAP ASSESSMENT RESULTS

Shown in Table 2 below is a summary of evidence obtained through interviews and document reviews specific to each category/functional grouping outlined in the Audit Criteria. If a potential gap or opportunity for improvement was identified against the ISO 14001:2015 and ISO 45001:2018 standards or there is a situation potentially impacting the effectiveness of the EOHS management system it is noted. Table 2 also includes the ISO element category, a summary of the observed deficiency or opportunity and a summary of a recommended corrective action.

Table 2: Identified EOHS Management System Potential Gap/Opportunity For Improvement

ISO Section Heading	ISO Section	Title	Potential Gap/Opportunity for Improvement	Proposed Corrective Action
Leadership	5	5.2 Environmental and Occupational Health and Safety Policy	Colgate is in the process of updating their Corporate EOHS Policy and it was in Draft during the Gap Assessment. Apex reviewed the policy and the associated guiding principles and compared them the requirements outlined in Clause 5.2 of the ISO Standards. The policy meets the intent as outlined in the ISO 14001 and 45001 Standards but does not specifically use some terminologies outlined in the Standards including addressing product life cycle, referencing the setting of EOHS goals and objectives and taking into consideration the most significant environmental impacts.	Consider adding language to the EOHS Policy and guiding principles to assure all the key elements of Clause 5.2 are met.
Planning	6	6.1.2 Hazard Identification and Risk Assessment	Although Colgate has identified its top environmental concerns including CO2 emissions, waste to landfill, waste use, and energy use it does not have a formalized process for identifying environmental aspects and impacts and risk ranking the impacts across the organization.	Consider developing a formalized process to identify environmental aspects and impacts from each facility and then roll-up to the corporate level to assure the highest risk aspects are being monitored and measured.
Planning	6	6.1.3 Compliance Obligations (Legal and Other Requirements)	Colgate does not maintain a list of compliance obligations for each location and/or a consolidated list of applicable EOHS regulation company-wide as outlined in Clause 6.1.3 of both ISO 14001 and 45001.	Consider developing a Legal Registry for each location base on country and local regulations.

5.0 EQUIVALANCY STATEMENT

Overall the management processes and procedures currently implemented at Colgate contain most of the elements of an effective environmental, health and safety management system as evaluated against the ISO 14001:2015 and ISO 45001:2018 standards and the expected outcomes. Shown in Appendix A is an Equivalency Statement

6.0 QUALITY ASSURANCE

As a world leader in providing services that our clients depend on, we continually strive to provide the highest quality. This report has been reviewed as a part of our quality process.

This report was reviewed by:



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ATTACHMENT 1
EQUIVALENCY STATEMENT

EQUIVALENCY STATEMENT

Colgate-Palmolive Company (Colgate) Environmental, Occupational Health, and Safety Management System to ISO Standards ISO 14001:2015 and ISO 45001:2018

Apex Companies, LLC (Apex) was retained to conduct an independent gap assessment of Colgate-Palmolive's (Colgate's) Environmental, Occupational Health, and Safety (EOHS) Management system against the requirements of ISO 14001:2015 Environmental Management System and ISO 45001:2018 Occupational Health and Safety Management System. Apex assessed the Colgate EOHS management system for equivalency to these standards. Apex understands that the Colgate management system has been prepared as a global standard for managing EOHS programs at Colgate facilities world-wide.

The conformance of the Colgate EOHS program to ISO 14001:2015 Environmental Management Systems and ISO 45001:2018 Occupational Health and Safety Management Systems is the sole responsibility of Colgate. Apex Companies sole responsibility was to provide independent assessment (gap analysis) of the existing programs against ISO 14001:2015 Environmental Management System and ISO 45001:2018 Occupational Health and Safety Management System standards.

Boundaries of the program covered by the equivalency:

- Colgate's corporate EOHS Management System
- Colgate facilities worldwide operating under Colgate's Global EOHS MS
- Individual operating facility procedures or documentation were not included in the gap assessment

Equivalency Methodology:

- Interviews with relevant personnel of Colgate; and
- Review of documented evidence produced by Colgate for their global EOHS Programs

Assurance Opinion:

Based on the processes, programs and procedures reviewed, no major deficiencies were found between the Colgate EOHS Management System compared to the ISO Standards referenced above. There were minor gaps or opportunities for improvement identified against the requirements of the ISO Standards. By definition, a minor deficiency is when the ISO elements are implemented but a management system weakness is detected, but it does not affect the capability of the EOHS to achieve its intended outcomes.

It is our opinion that Colgate has established appropriate systems for the management of Environmental, Occupational Health, and Safety systems at Colgate.

Statement of independence, impartiality and competence:

Apex Companies is an independent professional services company that specializes in Quality, Health, Safety, and Environmental management.

No member of the verification team has a business relationship with Colgate its Directors or Managers beyond that required of this assignment. We conducted this verification independently and to our knowledge there has been no conflict of interest.

The verification team has extensive experience in conducting assurance over environmental, social, and health and safety information, systems and processes, has over 50 years combined experience in this field and an excellent understanding of the gap assessment process.

Attestation:



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