



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 and Equivalency evaluation of the current corporate Environmental, Occupational Health and Safety Management System (EOHS) elements compared to the requirements outlined in the ISO 14001:2015 Environmental Management System and ISO 45001:2018 Occupational Health and Safety Management System standards.

2.0 SCOPE OF WORK

The EOHS gap assessment was conducted by Ms. Anne Bevington, Apex's National Practice Director for Compliance Assurance, Auditing and Management Systems. The primary contacts during the audit were Ms. Evelyn Olivia, EHS Manager along with support from Mr. Marty Stern, Global Director EHS.

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

The following corporate level program documents were requested by Apex for review:

- Colgate Palmolive's Environmental, Health and Safety Policy
- EHS Management Systems Standard
- Injury, Illness, and Event Reporting and Management Standard
- Non-Employee Worker Safety Standard
- EHS Audit Program Standard
- Hazardous Chemical Communication Standard
- Personal Protective Equipment Standard
- Construction Safety Management Standard
- Process Safety Management (PSM) Standard
- YE 2023 Reimagined "Top 10" Planet Actions Guideline
- Solid Waste Standard (96-027 SW)
- Environmental Performance Standard (96-027 EP)

In addition, Apex requested specific evidence or supporting documentation for review that included the following:

- Audit and Corrective Action Tracking module in GenSuite
- Site EHS Audit
- Site Verification Audit
- Site Self-Assessment
- Third-Party PSM Audit
- Year End EHS Review 2023
- Serious Incidents Fatalities (SIF)
- EHS Training and Tracking



2.1 Assessment Criteria

Although Colgate is not currently ISO certified, Apex follows a gap assessment checklist based on the requirements outlined in 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 are implemented in many industries and are routinely used to evaluate company-wide processes like Colgate's EOHS Management System.

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, deodorant, and pet foods. Colgate has operations worldwide including manufacturing, research and development, warehousing, and office locations.

The company maintains a management system at the corporate level that integrates and sets the minimal requirements for environmental and occupational health and safety for all locations. The manufacturing, warehousing and distribution facilities are responsible for meeting the minimal management system requirements and have the flexibility to implement site-specific programs and procedures as needed.

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 continues to implement a robust EOHS audit program that includes:
 - Self-Assessments
 - EHS Audits
 - PSM Audits
 - Verification Audits to verify that corrective actions have been completed and are effective
 - Sustainability and the Top 10 Planet Actions
- Colgate is utilizing the incident tracking and management module for incident reporting, corrective actions, and for communicating across the network.

4.0 GAP ASSESSMENT RESULTS

Shown in Table 1 is a summary of potential gaps or opportunities for improvement that were identified during the gap assessment. 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 below. Table 1 also includes the ISO element category, a summary of the observed deficiency or opportunity and a summary of a recommended corrective action.

Table 1: Identified EOHS Management System Potential Gaps and Opportunities for Improvement

ISO Section Heading	ISO Section	Title	Finding Category	Potential Gap/Opportunity for Improvement	Proposed Corrective Action
Documented Information	7.5.2	Creating and Updating Documented Information	Opportunity for Improvement	<p>Colgate is transitioning the written EOHS Standards into GenSuite and into an Excel and checklist format; however, not all management system documents have been converted. Apex specifically reviewed the following standards that had not been updated:</p> <ul style="list-style-type: none"> • Solid Waste Standard (96-027 SW) • Environmental Performance Standard (96-027 EP) 	Consider updating the Solid Waste Standard (96-027 SW) and the Environmental Performance Standard (96-027 EP) into the GenSuite format and ensure all EHS Management System Standards have been reviewed and updated.

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. Provided as a separate document associated with this report is an Equivalency Statement indicating that Colgate's EOHS Management Systems align to most of the requirements in ISO 14001:2015 and ISO 45001:2018.

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 prepared by:



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