COLGATE-PALMOLIVE (PTY) LTD INCORPORATED IN THE REPUBLIC OF SOUTH AFRICA				
CP WORKPLACE ACCESS POLICY				
Authorized:	Gail Jacobs HR Director	Francois Falls General Manager	Page	01 of 05
Signature:	As.	flea	Effective Date	08 July 2022
Date signed:	08 July 2022	08 July 2022	Supersedes	N/A

1. POLICY STATEMENT

- 1.1. The Company is obliged, in terms of the common law and the Occupational Health and Safety Act 85 of 1993 to, as far as is reasonably practicable, ensure that its Employees and persons who access its premises, are not exposed to any health or safety risks. The obligations include minimizing the spread of Covid-19 in the workplace, in accordance with the regulations and the Directions issued from time to time under the Disaster Management Act 57 of 2002 and the 11 June 2021 Consolidated Direction on Occupational Health and Safety Measures in Certain Workplaces.
- 1.2. The guidelines and recommendations of both the South African Government and the World Health Organization have confirmed that, in addition to the other preventative measures, vaccines are an important measure in protecting people from severe disease or dying from Covid-19.
- 1.3. The Company supports the Covid-19 vaccination rollout initiatives and encourages its employees to vaccinate to protect themselves and others from the adverse effects of Covid-19. The Company has adopted this Workplace Access Policy ("the Policy") as part of measures designed to fulfill its obligations set out above.

2. PURPOSE AND SCOPE OF APPLICABILITY

2.1. This Policy aims to provide for conditions under which access to the Workplace (being the Midrand office) will be permitted and it covers all Employees and other persons who access the Workplace.

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2.2. The Company reserves the right to extend this policy to its other various workplaces from time to time, based on the risk assessment and risk profile of each such workplace.

3. RISK ASSESSMENT

- 3.1. The Company has conducted a risk assessment of the Workplace in accordance with the amended Consolidated Directions on Occupational Health and Safety Measures and taking into account the proposed Department of Employment and Labour's Code of Practice on managing exposure to COVID-19 in the workplace.
- 3.2. Part of the risk assessment exercise was aimed at assessing the level of risk of transmission and potential severe illness that may lead to loss of life. The Company has identified that there is a prevalence of Employees who have high risk factors, which render them high risk cases in the event that they were to be infected.
- 3.3. The risk assessment exercise has shown that the risk of infection, severe illness and loss of life will be significantly reduced if the Employees and other persons accessing the Workplace are either vaccinated or are proven to not be infected with Covid-19.

4. CONDITIONS FOR ACCESS TO THE WORKPLACE

- 4.1. The Company, as part of the fulfillment of its legal obligations under the occupational health and safety legislation and regulations, reserves the right to refuse access to the Workplace to any Employee or person that does not meet the requirements set out in this Policy.
- 4.2. In order to significantly reduce the risks associated with Covid-19, access to the Workplace shall be granted only to Employees or persons who are either:
 - 4.2.1. fully vaccinated, unless medically exempt as provided for in paragraph 4.6; or
 - 4.2.2. in possession of a valid, negative Covid-19 medical test result (including PCR test result), which is not older than 48 hours, and which medical test shall be taken at the Employee's own cost.
- 4.3. For the purposes of this Policy "fully vaccinated" shall mean that the Employee or person concerned has either had:

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- 4.3.1. two Pfizer vaccination jabs and one booster shot, and two weeks have passed since receiving the last jab; or
- 4.3.2. one Johnson & Johnson vaccine and one booster shot, two weeks have passed since receiving the vaccine.
- 4.4. Proof of an Employee's vaccination status submitted by the Employee must be the official confirmation of vaccination obtained from the South African Government Portal: HTTPS://vaccine.certificate.health.gov.za.
- 4.5. Notwithstanding the provisions of paragraph 4.2, for a transitional period of 8 (eight) weeks after the effective date of this Policy, Employees who either have had two Pfizer vaccine doses or one dose of the & Johnson vaccine, will be allowed to access the Workplace without having to provide a medical test result contemplated in paragraph 4.2.2. Employees to whom this paragraph applies are urged to receive the booster shot as soon as possible during the transitional period.
- 4.6. Being exempt means either that the Employee has a temporary or permanent medical condition or situation, which makes the Employee's vaccination medically unsafe for him/her or for another person (in whom the Employee has a legal interest), in which event such employee shall be regarded as temporarily exempt or permanently exempt, depending on the nature of their medical condition.
- 4.7. Pursuant to clause 4.6, the duty is on the Employee to seek either temporary or permanent exemption and they may only do so by:
 - 4.7.1. Presenting a medical certificate by a qualified medical practitioner who is registered with the Health Professions Council of South Africa (or equivalent body in another country), which must specifically set out the medical condition or situation applicable to the Employee and which makes the Employee's vaccination medically unsafe for him/her or for another person (in whom the Employee has a legal interest), which medical certificate shall serve as a basis for the exemption only if, after examination by the Company appointed medical practitioner, it is confirmed that the exemption should be granted; or
 - 4.7.2. Presenting themselves to be examined and assessed by the Company appointed medical practitioner for the purposes of determining whether the Employee has a medical condition or situation applicable to the Employee and which makes the

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Employee's vaccination medically unsafe for him/her or for another person (in whom the Employee has a legal interest).

- 4.8. An Employee who is temporarily exempt shall, as soon as the condition or situation that made them to be temporarily exempt ceases to exist, also cease to be temporarily exempt and shall therefore be subject to requirements of this Policy and in particular, paragraph 4.2.2 should they continue to be unvaccinated even after they cease being medically exempt.
- 4.9. The Company shall, as part of its risk management measures, impose such conditions and measures as it deems appropriate in respect of unvaccinated Employees, including how they perform their work and interact with others in the Workplace.
- 4.10. During any period where the Company has introduced a formal hybrid working arrangement, the policy in place should strictly be adhered to, and all Employees will be required to report for work at the Workplace during the compulsory Company office days.
- 4.11. Given the importance of proper adherence to the requirements of this Policy, an Employee shall be guilty of gross misconduct, which may result in the summary termination of employment if he or she:
 - 4.11.1. deliberately provides false, inaccurate and/or misleading information relating to any matters dealt with in this Policy, including making a false declaration as to their vaccination status; or
 - 4.11.2. is not vaccinated and fails to report for duty at the Workplace as a result of that Employee not being in possession of the medical test result contemplated in paragraph 4.2.2; and
 - 4.11.3. does not strictly observe and comply with the hybrid working arrangement contemplated in paragraph 4.10, as introduced and/or amended from time to time, on account of the Employee's failure to obtain and/or be in possession of a medical test result contemplated in paragraph 4.2.2.
- 4.12. The HR and, to the extent necessary, the Legal Department, have the overall responsibility for the effective operation, compliance, and implementation of this Policy. At the operational level, the line managers have the day-to-day responsibility for the roll out of this Policy. Each Employee is required to endeavor not to pose a direct and/or indirect threat to the health or safety of other individuals in the workplace.

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5. REASONABLE ACCOMMODATION

- 5.1. The Company may, in appropriate and exceptional circumstances based on medical grounds, grant reasonable accommodation (in its sole discretion) to Employees and persons who are unable to comply with the Workplace access conditions and this shall only be granted in exceptional cases. The Company will explore all reasonable and affordable measures to accommodate exempt Employees.
- 5.2. However, if an Employee cannot be accommodated temporarily or permanently, or at all, or if they refuse the reasonable accommodation proposed by the Company in consideration of the Company's operational needs, their employment may regrettably be terminated after following due process and subject to the applicable laws.

6. PRIVACY, CONFIDENTIALITY AND PROTECTION OF PERSONAL INFORMATION

- 6.1. For purposes of this clause, "processing" includes collecting, receiving, recording, organizing, collating, storing, updating, retrieving, altering, consulting, using, disseminating, transmitting, distributing, making available, merging, linking, restricting, degrading, erasing, or destroying of any personal information.
- 6.2. Furthermore, for purposes of this clause, "data or personal information" includes special personal information belonging to an Employee including, amongst others, health or medical records.
- 6.3. By providing the Company with proof of having been vaccinated, and/or voluntarily providing the Company with access to their COVID-19 test results, or by declaring to the Company their they are not vaccinated, employees voluntarily and specifically consent to the Company processing their personal information or data for the purposes set out in this Policy.
- 6.4. Employees acknowledge that even in the absence of express consent, the Company may still process the Employee's Covid-19 test results and vaccination status information as it has a legal obligation to undertake all steps that are reasonably practicable to ensure the health and safety of workers and others at the workplace by mitigating and preventing the spread of Covid-19 in the workplace.

7. IMPLEMENTATION DATE

7.1. This policy will come into effect on 08 July 2022.

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Of July 2027