

**RSPO PRINCIPLE AND CRITERIA  
PUBLIC SUMMARY REPORT**

- Initial Assessment
- Annual Surveillance Assessment (3)
- Recertification Assessment (Choose an item.)
- Extension of Scope

<b>Olam International Limited</b>
Client company Address: 9 Temasek Boulevard #11-02 Suntec Tower Two Singapore
Certification Unit: <b>Olam Palm Gabon – Bilala Palm Oil Mill &amp; Supply Base</b>  Location of Certification Unit: PK19 National Road N1, Mouila, Gabon
Date of Final Report: 26/03/2021

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**Section 1: Scope of the Certification Assessment**

1. Company Details			
<b>Parent Company</b>	Olam International Limited		
<b>RSPO Membership Number</b>	1-0114-12-000-00	<b>Membership Approval Date</b>	10/02/2011
<b>Address</b>	9, Temasek Boulevard, #11-02 Suntec Tower Two, Singapore		
<b>Palm Oil Mill / Group Manager / Estate (Certification Unit)</b>	Olam Palm Gabon SA – Bilala Palm Oil Mill		
<b>Location / Address</b>	PK19 National Road N1, Mouila, Gabon		
<b>Website</b>	<a href="http://olamgroup.com">http://olamgroup.com</a>		
<b>Management Representative</b>	Ms Audrey Lee Mei Fong (Sustainability Manager)	<b>E-mail</b>	<a href="mailto:audrey.lee@olamnet.com">audrey.lee@olamnet.com</a>
<b>Telephone</b>	+603 64416771	<b>Facsimile</b>	+603 64416772

2. Certification Information			
<b>Certificate Number</b>	RSPO 671034	<b>Date of First Certification</b>	28/12/2017
		<b>Certificate Start Date</b>	28/12/2017
		<b>Certificate Expiry Date</b>	27/12/2022
<b>Scope of Certification</b>	Palm Oil and Palm Kernel Production		
<b>Visit Objectives</b>	<p>The objective of Olam Palm Gabon ASA3 was to;</p> <ul style="list-style-type: none"> <li>• Confirm that the elements of the proposed scope of registration and the management system are conforming to the requirements of the assessment standard.</li> <li>• To confirm that the organization has effectively implemented and addressed the management system.</li> <li>• To confirm the ability of the management system is able to meet applicable statutory and regulatory, contractual requirements, organization policies and wherever are applicable.</li> <li>• To identify areas for potential improvement of the management system(s).</li> <li>• Scope extension to Mouila Lot 2 – estate 7, 8 and 9.</li> </ul>		
<b>Assessment Cycle</b>	<input type="checkbox"/> Initial Assessment <input type="checkbox"/> Recertification Assessment (Choose an item.) <input checked="" type="checkbox"/> Annual Surveillance Assessment (Choose an item.ASA 3) <input checked="" type="checkbox"/> Scope Extension		
<b>Applicable Standards</b>	<input type="checkbox"/> RSPO P&C 2018 for the Production of Sustainable Palm Oil		

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	<input checked="" type="checkbox"/> Gabon National Interpretation (2020) for RSPO P&C 2018 for the Production of Sustainable Palm Oil <input type="checkbox"/> Group Certification 2016 <input type="checkbox"/> RSPO Independent Smallholders Standard 2019
<b>Supply Chain Module</b>	<input type="checkbox"/> Identity Preserved <input checked="" type="checkbox"/> Mass Balance

<b>3. Other Certifications</b>			
<b>Certificate Number</b>	<b>Standard(s)</b>	<b>Certificate Issued by</b>	<b>Expiry Date</b>
EU-ISCC-Cert-DE11924207028	ISCC EU	ASG Cert	26 June 2021

<b>4. Location(s) of Mill &amp; Supply Bases</b>			
<b>Name (Mill / Supply Base)</b>	<b>Location</b>	<b>GPS Coordinates</b>	
		<b>Latitude</b>	<b>Longitude</b>
Bilala POM	PK19 National Road N1, Mouila, Gabon	1° 39' 07.76" S	10° 51' 16.30" E
Estate 1	Annex 1- Mouila Lot 1 Estate and Infrastructure Map	1° 46' 37.30" S	10° 57' 43.80" E
Estate 2	Annex 1- Mouila Lot 1 Estate and Infrastructure Map	1° 41' 25.70" S	10° 51' 20.20" E
Estate 3	Annex 1- Mouila Lot 1 Estate and Infrastructure Map	1° 39' 07.75" S	10° 51' 16.30" E
Estate 4	Annex 1- Mouila Lot 1 Estate and Infrastructure Map	1° 39' 29.80" S	10° 49' 53.50" E
Estate 5	Annex 1- Mouila Lot 1 Estate and Infrastructure Map	1° 38' 13.20" S	10° 47' 24.10" E
Estate 6	Annex 1- Mouila Lot 1 Estate and Infrastructure Map	1° 37' 55.30" S	10° 51' 29.00" E
Estate 7	Annex 2 - Mouila Lot 2 Estate and Infrastructure Map	1° 39' 00.94" S	10° 26' 26.24" E
Estate 8	Annex 2 - Mouila Lot 2 Estate and Infrastructure Map	1° 34' 21.69" S	10° 27' 48.48" E
Estate 9	Annex 2 - Mouila Lot 2 Estate and Infrastructure Map	1° 33' 04.60" S	10° 31' 22.63" E
Estate 10	Annex 3 - Mouila Lot 3 Estate and Infrastructure Map	1° 54' 01.85" S	10° 58' 47.96" E
Estate 11	Annex 3 - Mouila Lot 3 Estate and Infrastructure Map	1° 57' 00.94" S	11° 00' 37.13" E
Estate 12	Annex 3 - Mouila Lot 3 Estate and Infrastructure Map	2° 0' 18.42" S	11° 02' 50.07" E
Estate 13	Annex 3 - Mouila Lot 3 Estate and Infrastructure Map	2° 4' 28.60" S	11° 07' 08.88" E
Estate 14	Annex 3 - Mouila Lot 3 Estate and Infrastructure Map	2° 8' 39.26" S	11° 07' 48.17" E
Estate 15	Annex 3 - Mouila Lot 3 Estate and Infrastructure Map	2° 10' 01.76" S	11° 10' 38.13" E

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<b>5. Description of Supply Base</b>					
<b>Estate</b>	<b>Total Planted (Mature + Immature) (ha)</b>	<b>HCV (ha)</b>	<b>Infrastruct ure &amp; Other (ha)</b>	<b>Total Area (ha)</b>	<b>% of Planted</b>
Estate 1 (Mouila Lot 1)	2,848.46	2,574.06	217.56	5,640.08	50.50
Estate 2 (Mouila Lot 1)	2,783.09	3,022.30	315.21	6,120.60	45.47
Estate 3 (Mouila Lot 1)	2,280.16	1,257.32	124.70	3,662.18	62.26
Estate 4 (Mouila Lot 1)	2,438.61	1,673.76	551.51	4,663.88	52.29
Estate 5 (Mouila Lot 1)	2,908.70	4,604.00	222.45	7,735.15	37.60
Estate 6 (Mouila Lot 1)	2,625.90	4,703.00	203.22	7,532.12	34.86
Estate 7 (Mouila Lot 2)	3,206.45	3,806.12	490.81	7,503.38	42.73
Estate 8 (Mouila Lot 2)	2,620.96	2,478.21	356.11	5,455.28	48.04
Estate 9 (Mouila Lot 2)	3,232.65	15,258.42	350.29	18,841.37	17.16
Estate 10 (Mouila Lot 3)	2,543.00	1,277.85	139.47	3,960.32	64.21
Estate 11 (Mouila Lot 3)	2,545.00	1,100.60	1,285.79	4,931.39	51.61
Estate 12 (Mouila Lot 3)	3,282.00	1,641.44	1,664.36	6,587.80	49.82
Estate 13 (Mouila Lot 3)	3,500.00	1,120.10	579.35	5,199.45	67.31
Estate 14 (Mouila Lot 3)	3,413.00	645.06	164.86	4,222.92	80.82
Estate 15 (Mouila Lot 3)	2,989.00	5,393.46	5,079.17	13,461.63	22.20
Total	43,216.98	50,555.70	11,744.86	105,517.55	48.46

<b>6. Plantings &amp; Cycle</b>							
<b>Estate</b>	<b>Age (Years) (ha)</b>					<b>Mature</b>	<b>Immature</b>
	<b>0 - 3</b>	<b>4 - 10</b>	<b>11 - 20</b>	<b>21 - 25</b>	<b>26 - 30</b>		
Mouila Lot 1	-	15,885	-	-	-	15,885	-
Mouila Lot 2	952	8,108	-	-	-	8,108	952
Mouila Lot 3	4,050	14,222	-	-	-	14,222	4,050
Total (ha)	5,002	38,215	-	-	-	38,215	5,002

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<b>7. Certified Tonnage of FFB (Own Certified Scope)</b>						
Estate	Tonnage / year					
	Estimated (Nov 2019-Oct 2020)	Actual (Nov 2019 – Oct 2020)		Forecast (Nov 2020-Oct 2021)		
		<i>Previous license period (Nov 2019 -Nov 2019)</i>	<i>Current license period (Dec 2019 – Oct 2020)</i>			
Estate 1 (Mouila Lot 1)	44,995.22	9,672.88	163,610.80	53,806.45		
Estate 2 (Mouila Lot 1)	32,736.47			46,597.61		
Estate 3 (Mouila Lot 1)	30,611.26			44,595.8		
Estate 4 (Mouila Lot 1)	38,308.21			65,842.51		
Estate 5 (Mouila Lot 1)	36,090.05			53,940.42		
Estate 6 (Mouila Lot 1)	20,650.60			32,217.56		
Estate 10 (Mouila Lot 3)	10,221.52			12,625.42		
Estate 11 (Mouila Lot 3)	14,805.50			15,885.04		
Estate 12 (Mouila Lot 3)	26,186.36			38,683.89		
Estate 13 (Mouila Lot 3)	26,942.23			37,190.88		
Estate 14 (Mouila Lot 3)	16,368.12			21,842.94		
Estate 15 (Mouila Lot 3)	315.10			9,965		
Estate 7 (Mouila Lot 2)	NA			NA	NA	29,235.9
Estate 8 (Mouila Lot 2)	NA					12,367.46
Estate 9 (Mouila Lot 2)	NA					16,664.55
<b>Total</b>	<b>288,830 MT</b>	<b>173,283.68 MT</b>		<b>293,644 MT</b>		

<b>8. Certified Tonnage of FFB (from other certified unit(s) (N/A)</b>				
Estate	Tonnage / year			
	Estimated (key in period)	Actual (key in period)		Forecast (key in period)
	<b>N/A</b>	<i>Previous license period (key in period covered)</i>	<i>Current license period (key in period covered)</i>	<b>N/A</b>
<b>Total</b>		<b>N/A</b>		

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9. Non-Certified Tonnage of FFB (outside supplier – excluded from certificate) (N/A)				
Independent FFB Supplier	Tonnage / year			
	Estimated (key in period)	Actual (key in period)		Forecast (key in period)
		Previous license period (key in period covered)	Current license period (key in period covered)	
Ndende	N/A	568.42 mt	4,388 mt	N/A
Mouila Lot 2	N/A	2,087.92 mt	17,196.74 mt	N/A
<b>Total</b>	<b>N/A</b>	24,241.08 mt		<b>N/A</b>

10. Certified Tonnage				
	Estimated (Dec 2019 – Nov 2020)	Actual (Nov 2019 – Oct 2020)		Forecast (Dec 2020 – Nov 2021)
	FFB	FFB		FFB
<b>Mill Capacity: 90 MT/hr</b>	298,230.63 mt	Previous license period (Nov 2019 -Nov 2019)	Current license period (Dec 2019 – Oct 2020)	293,644.00 mt
		9,672.88 mt	163,610.80 mt	
		173,283.68 mt		
	<b>CPO (OER: 24.22%)</b>	<b>CPO (OER: 24.07 %)</b>		<b>CPO (OER: 24%)</b>
	72,231.46 mt	2,145.75 mt	39,627.02 mt	70,474.56 mt
		41,772.77 mt		
	<b>PK (KER: 4.5 %)</b>	<b>PK (KER: 4.05 %)</b>		<b>PK (KER: 4.5%)</b>
	13,420.38 mt	391.75 mt	6,626.24 mt	13,213.98 mt
<b>TOTAL</b>	<b>N/A</b>	7,024.82 mt		<b>N/A</b>

11. Actual Sold Volume (CPO)					
Current License period (Dec 2019 – Oct 2020)					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	RSPO credit		
<b>CPO (MT)</b>	3,123.60	5,953.25	15,000	17,748.30	41,825.15
Previous License period (Nov 2019 – Nov 2019)					
<b>CPO (MT)</b>	0	0	0	0	0

Note: 52.38mt CPO stock carried over from previous reporting period. This is allowed by RSPO Secretariat.



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<b>12. Actual Sold Volume (PK)</b>					
<b>Current License period (Dec 2019 – Oct 2020)</b>					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	Others		
<b>PK (MT)</b>	986.74	0	0	0	986.74
<b>Previous License period (Nov 2019 – Nov 2019)</b>					
<b>PK (MT)</b>	497.06	0	0	0	497.06

<b>13. Independent Smallholders Certification Claims</b>		
	Credit	Physical Volume (MT)
<b>IS-CSPO</b>	N/A	N/A
<b>IS-CSPKO</b>	N/A	N/A
<b>IS-CSPKE</b>	N/A	N/A

## Section 2: Assessment Process

### Certification Body:

BSI Services Malaysia Sdn. Bhd. (ASI Accreditation Number: ASI-ACC-067)  
Suite 29.01 Level 29, The Gardens North Tower,  
Mid Valley City, Lingkaran Syed Putra,  
59200 Kuala Lumpur, Malaysia.  
Tel +60 (3) 9212 9638 Fax +60 (3) 9212 9639  
Representative: Nicholas Cheong ([Nicholas.Cheong@bsigroup.com](mailto:Nicholas.Cheong@bsigroup.com))  
Website: [www.bsigroup.com](http://www.bsigroup.com)

BSI is a leading global provider of management systems assessment and certification, with more than 84,000 certified locations and clients in over 180 countries. BSI Standards is the UK's National Standards Body. BSI provides independent, third-party certification of management systems. BSI is ASI Accredited (ASI-ACC-067) to conduct RSPO assessment since 31/10/2014 with accredited office located at Kuala Lumpur, Malaysia.

### 2.1 Assessment Methodology, Programme, Site Visits

The on-site assessment was conducted on 25<sup>th</sup> Nov. – 1<sup>st</sup> Dec. 2020. The audit programme is included as Section 2.3.

The approach to the audit was to treat the mill and supply base as an RSPO Certification Unit. A range of occupational health and safety, environmental, best practice management, and social factors were covered. This includes consideration of topography, palm age, proximity to areas with HCVs, declared conservation areas, local communities engagement and workers welfare and safety.

The Critical NC close out on-site assessment was conducted on 3<sup>rd</sup> and 4<sup>th</sup> Feb. 2021. The audit programs are included in Section 2.3.

The methodology for collection of objective evidence included physical site inspections, observation of tasks and processes, interviews of staff, workers and their families and external stakeholders, review of documentation and monitoring data. Gabon National Interpretation September 2020 of the RSPO Principles & Criteria 2018 for the Production of Sustainable Palm Oil was used to guide the assessment of information to assess compliance. The comments made by external stakeholders were also taken into account in the assessment.

The approach to the audit was to treat the mill and its supply base as an RSPO Certification Unit. The mill was audited together with the estates (and smallholders) of its supply base.

- The minimum sample size is four estates. Sample size for certification unit with more than four (4) estates were determined based on formula  $N = (0.8\sqrt{y}) \times (z)$  where y is the number of estates and where z is the multiplier defined by risk assessment
- As for the smallholders, the sample were determined following the RSPO Management System Requirements and Guidance for Group Certification of FFB Production (2016). The sampling of smallholders were based on the formula  $(0.8\sqrt{y}) \times (z)$ ; where y is total number of independent group member and where z is the multiplier defined by the risk assessment. The sampled smallholder listed in Appendix I.

Meetings were held with stakeholders to seek their views on the performance of the company with respect to the RSPO requirements and aspects where they considered that improvements could be made. At the start of each meeting, the interviewer explained the purpose of the audit followed by an evaluation of the relationship between the stakeholder and the company before discussions proceeded. The interviewer recorded comments made by stakeholders and these have been incorporated into the assessment findings.

Structured worker interviews with male and female workers and staff were held in private at the workplace in the mill and the estates. Fieldworkers were interviewed informally in small groups in the field. In addition, the wives of

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workers and staff were interviewed in informal group meetings at their housing. Separate visits were made to each of the local communities to meet with the village head and residents. Company officials were not present at any of the internal or external stakeholder interviews. A list of Stakeholders contacted is included as Section 3.5.

All the previous nonconformities are remains closed. The assessment findings for the initial assessment/annual surveillance assessment are detailed in Section 3.4.

This report is structured to provide a summary of assessment finding as attached in the Appendix A. The assessment was based on random samples and therefore nonconformities may exist that have not been identified.

For Initial and Re-certification assessment, the report was externally reviewed by RSPO approved Certification Reviewer prior to certification decision by BSI.

For Annual surveillance assessment, the report was internally reviewed and approved by BSI qualified certification reviewer.

**The following table would be used to identify the locations to be audited each year in the 5 year cycle**

<b>Assessment Program</b>					
<b>Name (Mill / Supply Base)</b>	<b>Year 1 (Certification)</b>	<b>Year 2 (ASA 1)</b>	<b>Year 3 (ASA 2)</b>	<b>Year 4 (ASA 3)</b>	<b>Year 5 (ASA 4)</b>
Bilala Palm Oil Mill	√	√	√	√	√
Estate 1	√		√		
Estate 2	√		√		
Estate 3		√			√
Estate 4		√			√
Estate 5		√		√	
Estate 6			√	√	
Estate 7			√		
Estate 8				√	
Estate 9			√		
Estate 10				√	
Estate 11					√
Estate 12					√
Estate 13			√	√	
Estate 14			√		
Estate 15			√		

**Tentative Date of Next Visit: November 22, 2021 - November 30, 2021**

**Total No. of Mandays: 18.**

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**2.2 BSI Assessment Team:**

Team Member Name	Role <i>(Team Leader or Team member)</i>	Qualifications <i>(Short description of the team members)</i>
Frank Kwesi	Team leader	<p><b>Education:</b> MA. Environmental Management and Policy from University of Cape Coast (Specialty: Corporate Environmental Management, Environmental Impact Assessment and Auditing, Pollution, Energy and Environment, Environmental Law and Policy, Environmental Economics, Advance Research Methods); BSc. Finance &amp; Entrepreneurship Development from Garden City University College and HND Wood Technology from the Kumasi Polytechnic.</p> <p><b>Trainings attended:</b> International General Certificate by NEBOSH (Occupational Health and Safety), Advance Executive Certificate in Managerial Leadership by Pan African Institute for Leadership &amp; Governance Studies, OHSAS 18001 Certified Auditor course, RSPO PnC 2013 Lead Auditor course, RA FSC FM/CoC Lead Auditor course, HCV Assessor Training, RSPO SCCS Lead Auditor course, RA SAS Lead Auditor course and ISO 9001:2015 Lead Auditor course.</p> <p><b>Working experience:</b> Cluster and Networks Expert – Fruit Value Chain – UNIDO WACOMP Project (National Consultant – July 2019 till date). Operation/Certification Coordinator at John Bitar Company Limited (Nov 2004 to Nov 2014); Assistant Production Manager at Samartex Timber &amp; Plywood Company Limited (Aug 2004 to Nov 2004); Management Trainee (National service) at Samartex Timber &amp; Plywood Company Limited (Aug 2003 to July 2004); RSPO, FSC and HCV Independent Consultant (2016 till date).</p>
Kouadio Kouame' Charles Innocent	Team Member	<p><b>Education:</b> BSc Agriculture Technical Engineering from the School of Agronomy (INPHB, Yamoussoukro)</p> <p><b>Training Attended:</b> RSPO P&amp;C 2018 Lead Auditor Course, Organic and SMETA Lead Auditor Course and ISO 9001:2008 Lead Auditor Course.</p> <p><b>Work Experience:</b> Agricultural Engineer since 2011 with experience in Environmental audit, Sustainable Agriculture, Certification of agricultural production systems. After 7 years' experience with Control Union as compliance officer, he is a consultant in Environmental audit, sustainable Agriculture, certification of agricultural production systems.</p>
John Takang	Team Member	<p><b>Education:</b> BSc. In Environmental and Natural Resources Management (BTU Cottbus – Germany), MSc. In Environmental Science (University of Cologne – Germany) and Diploma in Sustainability Studies (University of Uppsala – Sweden)</p> <p><b>Trainings attended:</b> RSPO P&amp;C 2018 Lead Auditor Course, Lead Auditor ISO 14001-2015 (attended), RSPO Smallholder Academy (Partner to the Academy) and Training in HCV/HCS.</p> <p><b>Working experience:</b> Resident Scholar at the United Nations University in Bonn (UNU-IHDP). After that he joined the International Forest Policy Unit (Internationale Waldpolitik – IWP) at the German Cooperation, GIZ. Currently working with Environmental Governance Institute (EGI), as the Founding Executive Director. Activity has been engaging in the conception, design and implementation of a wide range of conservation and development</p>

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		<p>projects in partnership with conservation and development partners such as World Wildlife Fund (WWF- Cameroon Country Programme Office), Critical Ecosystems Partnership Fund (CEPF); New England Biolabs Foundation (NEBF), Prince Bernhard Nature Fund (PBNF), African Bird Club (ABC), Chester Zoo, Rufford Foundation, and others.</p> <p>Has also worked extensively with Smallholders and their groups (especially Cooperatives) and has been responsible for facilitating the creation of several Smallholder Cooperatives in the Oil Palm sector in Cameroon.</p>
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**Accompanying Persons:**

Name	Role
Sarah Guaye	Translator/Technical Expert
Gbakre Aime Fulgence	Translator/Facilitator
Nicholas Cheong	Remote Observer

**2.3 Assessment Plan**

Date	Time	Subjects	FK	CK	JT	GAF
Saturday, 21/11/2020	0900 – 1600 GMT	Depart from Accra and Douala to Libreville	√		√	
Sunday, 22/11/2020	0900 – 1600 GMT	Depart from Abidjan to Libreville		√		√
Monday, 23/11/2020	Whole day	Audit team take Covid test and wait for Result	√	√	√	√
Tuesday, 23/11/2020	0800 – 1600 GMT	Team travel to Mouila Bilala Plantation	√	√	√	√ +SG
Wednesday 24/11/2020 Bilala Main office	0800 – 0830 GMT	<p>Opening Meeting at main office (PK19) Safety briefing and presentation by Olam Team (if any)</p> <ul style="list-style-type: none"> <li>• Presentation by BSI Lead Auditor -introduction of team member and assessment agenda</li> <li>• Confirmation of assessment scope and finalized stakeholders list for interview</li> </ul>	√	√	√	√ +SG
	0830 – 1230 GMT	<p><b>LOT 2 Document Review</b></p> <p>Documentation review covering entire certification unit/lot 2 estates document: P1 – Behave ethically and transparently</p> <p>P2 – Operate legally and respect rights</p> <p>P3 – Optimize productivity, efficiency, positive impact and resilience</p> <p>P4 – Respect community and human rights and deliver benefit</p> <p>P5 – Support smallholder inclusion</p>	√	√	√	√ +SG

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Date	Time	Subjects	FK	CK	JT	GAF
		<p>P6 – Respect workers’ rights and conditions P7– Protect, conserve and enhance ecosystems and the environment.</p> <ul style="list-style-type: none"> <li>• Workers list and sampling</li> <li>• Employment procedure and process</li> <li>• Social impact assessment / management plan</li> <li>• Communication and Grievance procedures - Code of ethical conduct</li> <li>• Stakeholder list and consultation</li> <li>• Operational service contractor contract</li> <li>• Legality of FFB - Local sustainability</li> </ul>				
		<ul style="list-style-type: none"> <li>• Occupational health and safety (H&amp;S) mitigation plan and - Worker trainings</li> <li>• Risk assessment and medical records - Chemical utilization risk</li> <li>• Medical surveillance records</li> <li>• PPE issuance and monitoring</li> <li>• Safety meeting and person in charge for H&amp;S</li> <li>• Emergency procedures</li> <li>• PPE compliance and monitoring - Medical care/insurance for workers</li> <li>• LTA/LTI monitoring –</li> <li>• Environmental Impact assessment / Environmental Management plan for whole certification unit</li> <li>• Water management and consumptions</li> <li>• Waste management / fossil fuel consumptions / GHG and pollutant management / POME</li> <li>• HCV / RTE and management plan - No use of fire Good Agriculture Practice (GAP)</li> <li>• Soil analysis (mapping) and fertility</li> <li>• Road maintenance and peat soil</li> <li>• IPM and Pesticide usage plan</li> <li>• Planting and land statement</li> <li>• New Planting (if any)</li> <li>• Business and management plan/replanting programme</li> <li>• Management review - Continuous improvement action plan</li> <li>• Annual reports</li> <li>• RSPO matrix template - Operation procedures Smallholder inclusion (if any)</li> <li>• Transparency (pricing, term and conditions etc)</li> <li>• Payment - Stamping/calibration of weighing equipment</li> <li>• ICS and grievance mechanism</li> </ul>				

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		<b>Human rights</b> <ul style="list-style-type: none"> <li>• Policy on human rights, prohibition of retaliation</li> <li>• Conflict resolution process</li> <li>• Contribution to community development</li> <li>• FPIC process, customary rights etc</li> <li>• Land conflict issues and resolution process</li> <li>• No discrimination and equal opportunities</li> <li>• Recruitment process</li> <li>• Decent living wages</li> <li>• Freedom of association (FOA)</li> </ul> Prohibition of child labor, young workers etc - Prohibition of sexual harassment - Reproductive rights - Forced labor				
	1000 – 1230 GMT	Stakeholder Consultation				
	1230-1330	Lunch Break				
	1330-1630	Continue with unfinished elements (pre-lunch activities)				
	1630-1700	<b>Interim closing for day 1</b>				
Thursday 26/11/2020	0800 – 1200 GMT	<b>LOT 2 Estate Visit</b> Estate 7 Field visit covering boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation and chemical management, OSH&ERP, waste management and SEIA requirement.	√	√	√	√ +SG
	1000 – 1230 GMT	Stakeholder Consultations				
	1230 – 1330	Lunch Break				
	1330 – 1630 GMT	Estate 9 Field visit covering boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation and chemical management, OSH&ERP, waste management and SEIA requirement.				
	1630 – 1700 GMT	<b>Interim closing for day 2</b>				
Friday 27/11/2020	0800 – 1200 GMT	<b>LOT 1 (Estate 6) Visit</b> Estate 9 Field visit covering boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation and chemical management, OSH&ERP, waste management and SEIA requirement.	√	√	√	√ +SG

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Date	Time	Subjects	FK	CK	JT	GAF
	1000-1230 GMT	Stakeholder Consultations				
	1230 – 1330 GMT	Lunch Break				
	1330 – 1630 GMT	<p><b>LOT 1 (Estate 6) Document Review</b></p> <p>Documentation review covering entire certification unit/lot 1 estates document: P1 – Behave ethically and transparently</p> <p>P2 – Operate legally and respect rights</p> <p>P3 – Optimize productivity, efficiency, positive impact and resilience</p> <p>P4 – Respect community and human rights and deliver benefit</p> <p>P5 – Support smallholder inclusion</p> <p>P6 – Respect workers’ rights and conditions P7– Protect, conserve and enhance ecosystems and the environment.</p> <ul style="list-style-type: none"> <li>• Workers list and sampling</li> <li>• Employment procedure and process</li> <li>• Social impact assessment / management plan</li> <li>• Communication and Grievance procedures - Code of ethical conduct</li> <li>• Stakeholder list and consultation</li> <li>• Operational service contractor contract</li> <li>• Legality of FFB - Local sustainability</li> <li>• Occupational health and safety (H&amp;S) mitigation plan and - Worker trainings</li> <li>• Risk assessment and medical records - Chemical utilization risk</li> <li>• Medical surveillance records</li> <li>• PPE issuance and monitoring</li> <li>• Safety meeting and person in charge for H&amp;S</li> <li>• Emergency procedures</li> <li>• PPE compliance and monitoring - Medical care/insurance for workers</li> <li>• LTA/LTI monitoring –</li> <li>• Environmental Impact assessment / Environmental Management plant for whole certification unit</li> <li>• Water management and consumptions</li> <li>• Waste management / fossil fuel consumptions / GHG and pollutant management / POME</li> <li>• HCV / RTE and management plan - No use of fire Good Agriculture Practice (GAP)</li> </ul>	√	√	√	√ +SG



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Date	Time	Subjects	FK	CK	JT	GAF
		<ul style="list-style-type: none"> <li>• Soil analysis (mapping) and fertility</li> <li>• Road maintenance and peat soil</li> <li>• IPM and Pesticide usage plan</li> <li>• Planting and land statement</li> <li>• New Planting (if any)</li> <li>• Business and management plan/replanting programme</li> <li>• Management review - Continuous improvement action plan</li> <li>• Annual reports</li> <li>• RSPO matrix template - Operation procedures</li> <li>• Smallholder inclusion (if any)</li> <li>• Transparency (pricing, term and conditions etc)</li> <li>• Payment - Stamping/calibration of weighing equipment</li> <li>• ICS and grievance mechanism</li> </ul> <p><b>Human rights</b></p> <ul style="list-style-type: none"> <li>• Policy on human rights, prohibition of retaliation</li> <li>• Conflict resolution process</li> <li>• Contribution to community development</li> <li>• FPIC process, customary rights etc</li> <li>• Land conflict issues and resolution process</li> <li>• No discrimination and equal opportunities</li> <li>• Recruitment process</li> <li>• Decent living wages</li> <li>• Freedom of association (FOA)</li> <li>• Prohibition of child labor, young workers etc -</li> <li>• Prohibition of sexual harassment - Reproductive rights</li> <li>• - Forced labor</li> </ul>				
	1630 – 1700 GMT	<b>Interim closing for day 3</b>				
Saturday 28/11/2020	0800 – 1700 GMT	<p><b>LOT 3 (Estate 13 &amp; 14) Document Review</b></p> <p>Documentation review covering entire certification unit/lot 1 estates document: P1 – Behave ethically and transparently</p> <p>P2 – Operate legally and respect rights</p> <p>P3 – Optimize productivity, efficiency, positive impact and resilience</p> <p>P4 – Respect community and human rights and deliver benefit</p> <p>P5 – Support smallholder inclusion</p> <p>P6 – Respect workers’ rights and conditions P7– Protect, conserve and enhance ecosystems and the environment.</p> <ul style="list-style-type: none"> <li>• Workers list and sampling</li> </ul>	√	√	√	√ +SG

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Date	Time	Subjects	FK	CK	JT	GAF
		<ul style="list-style-type: none"> <li>• Employment procedure and process</li> <li>• Social impact assessment / management plan</li> <li>• Communication and Grievance procedures - Code of ethical conduct</li> <li>• Stakeholder list and consultation</li> <li>• Operational service contractor contract</li> <li>• Legality of FFB - Local sustainability</li> <li>• Occupational health and safety (H&amp;S) mitigation plan and - Worker trainings</li> <li>• Risk assessment and medical records - Chemical utilization risk</li> <li>• Medical surveillance records</li> <li>• PPE issuance and monitoring</li> <li>• Safety meeting and person in charge for H&amp;S</li> <li>• Emergency procedures</li> <li>• PPE compliance and monitoring - Medical care/insurance for workers</li> <li>• LTA/LTI monitoring –</li> <li>• Environmental Impact assessment / Environmental Management plant for whole certification unit</li> <li>• Water management and consumptions</li> <li>• Waste management / fossil fuel consumptions / GHG and pollutant management / POME</li> <li>• HCV / RTE and management plan - No use of fire Good Agriculture Practice (GAP)</li> <li>• Soil analysis (mapping) and fertility</li> <li>• Road maintenance and peat soil</li> <li>• IPM and Pesticide usage plan</li> <li>• Planting and land statement</li> <li>• New Planting (if any)</li> <li>• Business and management plan/replanting programme</li> <li>• Management review - Continuous improvement action plan</li> <li>• Annual reports</li> <li>• RSPO matrix template - Operation procedures Smallholder inclusion (if any)</li> <li>• Transparency (pricing, term and conditions etc)</li> <li>• Payment - Stamping/calibration of weighing equipment</li> <li>• ICS and grievance mechanism</li> </ul>				
		<p><b>Human rights</b></p> <ul style="list-style-type: none"> <li>• Policy on human rights, prohibition of retaliation</li> </ul>				

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Date	Time	Subjects	FK	CK	JT	GAF
		<ul style="list-style-type: none"> <li>• Conflict resolution process</li> <li>• Contribution to community development</li> <li>• FPIC process, customary rights etc</li> <li>• Land conflict issues and resolution process</li> <li>• No discrimination and equal opportunities</li> <li>• Recruitment process</li> <li>• Decent living wages</li> <li>• Freedom of association (FOA)</li> <li>• Prohibition of child labor, young workers etc -</li> <li>Prohibition of sexual harassment - Reproductive rights</li> <li>- Forced labor</li> </ul>				
	1000 – 1230 GMT	Stakeholder Consultations				
	1230 – 1330 GMT	Lunch break				
	1630 – 1700 GMT	<b>Interim closing for day 4</b>				
Sunday 29/11/2020	<b>Free Day</b>					
Monday 30/11/2020	0800 – 1230 GMT	<b>LOT 3 (Estate 13 &amp; 14) Visit Review</b> Estate 13 Field visit covering boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation and chemical management, OSH&ERP, waste management and SEIA requirement.	√	√	√	√ +SG
	1000 – 1230 GMT	Stakeholder Meeting				
	1230 – 1330 GMT	Lunch Break				
	1330 – 1630 GMT	Estate 14 Field visit covering boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation and chemical management, OSH&ERP, waste management and SEIA requirement.				
	1630 – 1700 GMT	<b>Interim closing for day 5</b>				
Tuesday 01/12/2020	0830 – 1500 GMT	<b>Bilala POM</b> <ul style="list-style-type: none"> <li>• Mill Visit covering FFB receiving, milling process, warehouse, workshop, wastes management (including Landfill is applicable), Effluent Ponds, OSH &amp; ERP, environmental management, POME application, water treatment, chemical storage and laboratory. Workers interview covering social elements</li> <li>• <b>SCCS for POM (3.8)</b></li> </ul>	√	√	√	√ +SG

Date	Time	Subjects	FK	CK	JT	GAF
		Supply chain for Mills (3.8.1 – 3.8.17)				
	1230 - 1330	Lunch				
	1500 - 1600	Audit team consolidate note and findings and prepare for closing meeting				
	1600 - 1700	<b>Closing Meeting &amp; End of Audit</b>				
Wednesday 02/11/2020	0800 - 1600	Audit travel back to Libreville and home country	√	√	√	√ +SG

### Section 3: Assessment Findings

#### 3.1 Normative requirement applied for this assessment:

- Olam International Gabon Multiple Management Units / Time Bound Plan
- RSPO Principle & Criteria 2018 for the Production of Sustainable Palm Oil
- RSPO Group Certification Standard 2016
- Gabon National Interpretation Sept. 2020 for RSPO P&C 2018
- Independent Smallholder Standard 2019

#### 3.2 Multiple Management Units and Time Bound Plan

Requirement	Assessment	Compliance
Does the plan include all current subsidiaries, estates and mills that is under the control of the holding company?	The time bound plan includes all operating units in Gabon, Africa i.e. Awala, Mouila Lot 1, 2 and 3, Makouke and Sotrader Ndende. The certification plan is last revised and approved in August 2016 to include new acquisition (Makouke). To date, certification was achieved according to the time bound plan. There are two established CPO mills and one KCP, all these facilities are currently certified. Progress are reported on the quarterly palm sustainability dashboard which is available on the Olam's website.	Yes
Have all the estates and mills certified within five years after obtaining RSPO membership?	Olam joins RSPO in 2011, however four estates are new plantings and one estate is acquired. All new plantings are fully complying to the RSPO NPP. Certification is planned when the estate is mature, and mill is established, acquired asset is certified within five years as per the RSPO certification system and standard.	Yes
Have there been any new acquisitions? If yes, the new acquisitions shall be certified within three-year from the date of acquisition. Certification plan for the new acquisition shall be available.	Makouke was acquired by OPG in 2016, it is an old plantation established since 1960 and it is certified since 2019.	Yes
Have there been any changes to the time-bound plan since the last audit (both new acquisition and existing)? If yes, justification is required. Is this consistent with the ACOP reporting?	No change since last audit. TBP is consistent with the ACOP.	Yes
Have there been any isolated lapses in implementation of the plan? If yes a <b>Minor</b> non-compliance shall be raised	No lapse in implementation.	Yes

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Have there been any fundamental failure (e.g. unable to justify delay in planning the assessments) to proceed with implementation of the plan? If yes a <b>Major</b> non-compliance shall be raised	No delay. Certification is planned according to the TBP.	No
<b>Un-Certified Units or Holdings</b>		
No replacement after dates defined in NIs Criterion 7.3: <ul style="list-style-type: none"> <li>• Primary forest.</li> <li>• Any area required to maintain or enhance HCVs in accordance with RSPO P&amp;C criterion 7.3.</li> </ul>	All management units including uncertified units are fully complying to the RSPO NPPs and it includes no replacement of primary forest and HCV areas.	Yes
Any new plantings since January 1 <sup>st</sup> 2010 shall comply with the RSPO New Plantings Procedure.	Yes, all management units including uncertified units are fully complying to the RSPO NPPs and complete public consultation, information is available on the RSPO NPP website and Olam website.	Yes
Any Land conflicts are being resolved through a mutually agreed process, such as RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO P&C criteria 2.2, 6.4, 7.5 and 7.6.	No case registered under the RSPO complaints or Dispute Settlement Facility. All management units have been subjected to the FPIC process with all impacted villages as part of the NPP.  If there is any grievance including land dispute, it will be resolved through mutually agreed process as per OPG's internal SOP.	Yes
Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 6.3.	One case was resolved through mutual agreement with the communities in Mar 2017, summary is available on the Olam's <a href="#">website</a> .	Yes
Any Legal non- compliance is being addressed through measures consistent with the requirements of RSPO P&C criteria 2.1	There is 2.97 ha of overplanted area in the acquired plantation i.e. Makouke beyond boundary stated in the lease document. The area has been handed over to the authority and revised estate map, dated 6th August 2019 by GIS Department was verified. Record is verified and available in the RSPO assessment report (Awala and Makouke 2019).	Yes
Did the company conduct internal audit against the uncertified management units requirement? If yes, a positive assurance statement shall be available.	Internal audit including RSPO, legal compliance etc. are conducted annually for all management units. Reports are available for verification.	Yes
Have there been any stakeholder (including NGO) consultation conducted?	Stakeholders consultation (including NGOs) is implemented systematically throughout all management units as part of the NPP, summary of consultation is available in the NPP reports. OPG practices continuous engagement with stakeholders through the community steering committees with	Yes

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	impacted villages, dialogue and site visits, see Olam’s website on <a href="#">stakeholders engagement</a> .	
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**3.3 Progress of scheme smallholders and/or outgrowers**

<b>Progress of scheme smallholders or outgrowers towards compliance with relevant standards</b>		
<b>Requirement</b>	<b>Remarks</b>	<b>Compliance</b>
Has 100% of scheme smallholders and/or scheme outgrowers comply with the standard within three years of the mill’s initial certification?  OFI shall be raised if after one year where 100% of the scheme smallholders and scheme outgrowers are not in compliance, a minor NC after two years, and a major NC if this requirement is not met after three years.	Not applicable as there are no scheme smallholder on OPG supply base.	N/A

**3.4 Details of Nonconformities**

The nonconformities are listed below. The findings summary of the assessment by criteria are listed in Appendix A.

During this 3<sup>rd</sup> Surveillance Assessment there were 4 Critical; 1 Minor nonconformities and 6 Opportunity For Improvement raised. The Bilala POM Certification unit submitted Corrective Action Plans for the nonconformity. Corrective action plans with respect to the nonconformity was reviewed by the BSI audit team and accepted.

The implementation of the corrective action plans to address the minor nonconformity will be followed up during the next surveillance assessment. The implementation of the Corrective Actions for the Critical Nonconformity(ies) has been verified for it effectiveness and closed accordingly. The below is the summary of the non-conformity raised during this assessment.

<b>Non-conformity</b>			
<b>NCR Ref #</b>	2019872-202011-M1	<b>Clause &amp; Category (Critical / Minor)</b>	Indicator 6.7.3 Critical
<b>Date Issued</b>	01/12/2020	<b>Due Date</b>	28/02/2021
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	04/02/2021
<b>Statement of Nonconformity:</b>	Supply and validity of PPEs not effectively checked		
<b>Requirement Reference:</b>	<b>(C)</b> Workers use appropriate personal protective equipment (PPE), which is provided free of charge to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, land preparation, and harvesting. Sanitation facilities for those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing.		
<b>Objective Evidence:</b>	Some respirators used by pesticide applicators were found with expired cartridges (Filters) since 2015 and 2019. These were evident in estate 9 block O11 and estate 6 block K30.		

	<p>Additionally, visit to the loading ramp in Lot3 found the workers with no Anti-Fall and Safety Harness as identified as PPEs to be used in the risk assessment document.</p>
<b>Corrections:</b>	<p>Socialization of OPG’s risk assessment, PPE requirement according to operation activities to relevant PIC.</p>
<b>Root Cause Analysis:</b>	<p>There is a restructuring of Sustainable Development (SD) function in May 2020, and health/ medical and safety division are integrated as part of the SD function with appointment of PIC for safety leader, PPE and storage assistant etc. There is lack of diligent monitoring by appointed PIC.</p>
<b>Corrective Actions:</b>	<ol style="list-style-type: none"> <li>1) Conduct briefing on OPG’s risk assessment, PPE requirement to appointed PIC on PPE and storage by safety division head for all sites (Lot 1, 2, 3) and supported by the head of health and safety department.</li> <li>2) Provide one off report of expiry date for current PPE (i.e. cartridge) in stock and implement a procedure to manage the expiry dates of all PPE</li> <li>3) Provide a report of the availability of anti-fall harness for all loading ramps. (Lot 1, 2, 3).</li> <li>4) Communicate to all spraying team on the process to replace expired cartridge for all sites (Lot 1, 2, 3).</li> <li>5) Provide training to loading ramp workers on proper use of PPE at Lot 3</li> </ol>
<b>Assessment Conclusion:</b>	<p>Major NC close out of verification conducted on 3<sup>rd</sup> and 4<sup>th</sup> Feb. 2021. Olam has subsequently trained all sprayers in the Lot 1,2 and 3 on;</p> <ol style="list-style-type: none"> <li>1. The dangers of using expired PPE</li> <li>2. How to check for expired date of PPEs especially on the cartridge.</li> </ol> <p>Both training were conducted on 20/01/2021. In all 59 sprayers trained as sighted on the attendance sheet. Additionally the stores department has taken out all expired cartridges from the store and from the sprayers. Has furthermore developed a monitoring sheet of all items especially PPEs with their expiring dates to know when they will expired and to be replaced. The sheet which is captured Monitoring of Imported PPE was sighted. Review of the sheet did not established any expired PPE (Cartridge). Also cartridges in stock were found with expiring date of 2022/06 and 2023/01. A visit to estate 1, block 29 where spraying activity was ongoing did not come across any usage of expired cartridges as those in use has expiration date 2025/05. Interview with the workers also established the training received and could demonstrate where to check the validity of the cartridges from.</p> <p>Regarding the loading ramp, Olam, has conducted training for all staff at Lot2 loading ramp. The training was centered on the risk at the loading ramp and the importance of wearing the safety harness (anti-fall). The training attendance sheet sighted confirmed all 6 workers trained. A visited to estate 13 loading ramp and interview with the workers confirmed the training. Additionally workers were found wearing the safety harness (anti-fall) while offloading the FFBS unto the ramp.</p> <p>The onsite verification found the NC effectively addressed based on documented evidence and field interviews. Hence the NC is considered closed dated 04/02/2021 with continuous implementation to be further verified in the subsequent audit.</p>



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<b>Non-conformity</b>			
<b>NCR Ref #</b>	2019872-202011-M2	<b>Clause &amp; Category (Critical / Minor)</b>	Indicator 6.2.4 Critical
<b>Date Issued</b>	01/12/2020	<b>Due Date</b>	28/02/2021
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	04/02/2021
<b>Statement of Nonconformity:</b>	Housing and sanitation conditions inadequate		
<b>Requirement Reference:</b>	The unit of certification provides housing, sanitation facilities, drinking water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. National laws, or in their absence the ILO Guidance on Workers' Housing Recommendation No. 115, are used. In the case of acquisitions of non-certified units, a plan is developed detailing the upgrade of infrastructure. A reasonable time (5 years) is allowed to upgrade the infrastructure.		
<b>Objective Evidence:</b>	<p>The unit of certification provides housing facilities for its workers distributed across several camps (Mbadi, Mboukou, PK19).</p> <p>The Company-wide agreement (Accord d'Etablissement, in Article 22.2.1 (a)) provides that workers who live with their families (i.e. spouse/partner and children) in the housing on the plantation will have a standard housing unit of 2 rooms.</p> <p>However, this provision is not respected by Olam in the attribution of housing units. A visit to the Mboukou housing area (first Housing Block right after the Clinic and directly next to where trucks, tractors and other vehicles are parked) in the 4th apartment, two families (husband, wife and 2 children) and (Husband, wife and 3 children) share the same apartment. This is same with the 3rd Housing Block from the clinic, where in apartment 7, (husband, wife and 1 kid) share an apartment with an unmarried man. The married couple actually has 3 kids but had only bring only one kid to live with them because of only a single has been allocated to the couple.</p> <p>Similarly, in Mbadi it was established that apartment S1 houses 7 persons (contract workers from J Stephane Services) and apartment S4 houses 9 persons (contract workers from Ngounie Transport Services).</p> <p>Additionally, water supply in some of the houses were frequently interrupted sometimes for more than 2 days (e.g. Blocks P, Q, T, U, V, P in Mbadi Housing Facilities). Meanwhile in Mandji, the Block that houses the Kindergarten and the Block directly behind do not have constant water supply.</p> <p>Also, workers at Lot 1 landfill site revealed that they trek up to 1.5 km in and out of their work station (i.e. 3km daily). It was also established that they have not been adequately sensitized to use the sanitation facility to wash down after work.</p>		
<b>Corrections:</b>	Reinforce housing agreement (Housing Occupation Agreement) to all administration department and reallocate housing according to the agreement.		

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	<p>Make arrangement to distribute water into all houses.</p> <p>Socialization of health and safety procedures to workers at landfill site and continue to monitor compliance during weekly monitoring by Safety Division.</p>
<b>Root Cause Analysis:</b>	<p>Housing agreement and SOP is in place but not respected by contractors. They bring others members of families and friends without Olam knowledge. As per the policy, contractors who are accommodated are only those who are bachelors and they are supposed to be maximum 4 per house which means, 2 per room.</p> <p>Malfunction of booster pump causes low water pressure and distribution disruption.</p> <p>Workers at landfill site are unaware of the importance of sanitation after work.</p>
<b>Corrective Actions:</b>	<ol style="list-style-type: none"> <li>1) Conduct a population census for all current housing in Mboukou and Mbadi complex. Follow the SOP and ensure the housing capacity limit is respected according to company policy.</li> <li>2) Install booster pumps at Mbadi and Mandji complex and verify their effectiveness.</li> <li>3) Conduct health and safety awareness briefings to workers at landfill site in Lot 1 and continue to monitor compliance on a weekly basis by health and safety division. Safety division and operation team must coordinate to arrange transportation for the landfill workers .</li> </ol>
<b>Assessment Conclusion:</b>	<p>Major NC close out of verification conducted on 3<sup>rd</sup> and 4<sup>th</sup> Feb. 2021.</p> <p>Olam has subsequently relocated the families into a standard housing unit of 2 rooms. They maintained that, the company’s housing agreement for staff (Accord d’Etablissement, in Article 22.2.1 (a)) provides that workers who live with their families (i.e. spouse/partner and children) in the housing on the plantation will have a standard housing unit of 2 rooms. However, these workers did not mentioned their marital status of the time of employment, hence the estate department was not aware of their current status. A visit to the housing area and interview with the families confirmed the assertion and also confirmed the relocation into a standard housing unit of 2 rooms.</p> <p>On the part of the contract workers, Olam has carried out housing census on all housing onsite to establish who occupies them as well the number of occupants. The report captured Audit Housing Report-21 was sighted. Olam has also renewed and signed Housing Occupation Agreement with all the contract managers. The agreement mentioned that each apartment will house 6 contract workers with 3 to a room. The agreement which is dated 20/01/2021 and has been signed by 19 of the contract managers was sighted. A visit to Lot3 and Lot2 housing (block Y, Z and the KG block) which houses contractor worker of J.C Services, DIFOR and Sonixt established that 4 workers were currently occupying the apartment with 2 in each room. Interview with the occupant established that they have been briefed by the contract managers on the maximum number of occupant in the apartment.</p> <p>Also to improve on water access, Olam has put in place daily water supply schedule to ensure water get to homes on daily basis. Hence water is pumped daily between the hours of 5am – 7am, 12noon – 2pm and 6pm – 9pm. Interview with the occupants in the houses visited in Lot3 and Lot2 housing (block Y, Z and the KG block) confirmed to improvement in the water supply. However mentioned more</p>

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	<p>can be done as in some days are without water. Olam mentioned they are still working on a system to boost the pressure of the pumping devise, but until that is done they have resolved to the daily water supply schedule.</p> <p>At Lot1 landfill, Olam has conducted training for all 5 workers at the landfill on the need to use the sanitary facility after close of work and provision of transport to convey them to and from work. Subsequently, Olam has made available 3 containers filled with water and soap to be used to wash down before leaving onsite. Also transportation is made available for the workers on daily basis. Interview with the workers confirmed.</p> <p>The onsite verification found the NC effectively addressed based on documented evidence and field interviews. Hence the NC is considered closed dated 04/02/2021 with continuous implementation to be further verified in the subsequent audit.</p>
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Non-conformity			
<b>NCR Ref #</b>	2019872-202011-M3	<b>Clause &amp; Category (Critical / Minor)</b>	<b>Indicator 6.6.1 Critical</b>
<b>Date Issued</b>	01/12/2020	<b>Due Date</b>	<b>28/02/2021</b>
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	<b>04/02/2021</b>
<b>Statement of Nonconformity:</b>	Passports of Indonesian Foreign Workers (IFW) are retained by Olam		
<b>Requirement Reference:</b>	<p>All work is voluntary and the following are prohibited:</p> <ul style="list-style-type: none"> <li>• Retention of identity documents or passports</li> <li>• Payment of recruitment fees Contract substitution involuntary overtime.</li> <li>• Lack of freedom of workers to resign</li> <li>• Penalty for termination of employment</li> <li>• Debt bondage</li> <li>• Withholding of wages</li> </ul> <p>- Critical (Major) compliance -</p>		
<b>Objective Evidence:</b>	<p>According Olam’s Foreign Workers’ Recruitment Policy (SOP no. 12/SD-FWR (01)/0820), the Section on <b>Management Commitment</b> (Art.8), states that: Workers’ passport might be held by the management for safekeeping purpose. In such case, workers must sign a consent letter and passport must be returned to the workers upon request at any time.</p> <p>However, the passports of Indonesian Foreign Workers (IFW) are retained by Olam, and no real proof of consent was provided at the time of the audit. HR provided a list of just two IFWs (name, date of birth, Olam number, passport number and signature), it therefore remains unclear whether the IFWs actually gave their consent for the retention of their passports.</p>		
<b>Corrections:</b>	HR Department to maintain a list of current foreign workers and apply OPG’s foreign workers procedure (including protocol for passport retention).		

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<b>Root Cause Analysis:</b>	Restructuring of management representative and recruitment of foreign workers is assigned under HR Department. The whole procedure from recruitment to workers site transportation and passport keeping was previously managed by a management representative and supported by the Administrative Department.
<b>Corrective Actions:</b>	<ol style="list-style-type: none"> <li>1) Provide a copy of a signed letter to all current foreign workers on passport retention due to safe keeping or application/ renewal of government work permits.</li> <li>2) Workers should also be informed and must understand that they could retrieve their passport at any time according to the procedure.</li> </ol>
<b>Assessment Conclusion:</b>	<p>Major NC close out of verification conducted on 3<sup>rd</sup> and 4<sup>th</sup> Feb. 2021.</p> <p>Signed copies of the Section on <b>Management Commitment</b> (Art.8), of Olam's Foreign Workers' Recruitment Policy (SOP no. 12/SD-FWR (01)/0820) was sighted. Interview with some of the workers (Indonesia Foreign Workers) established, they agree to Olam holding their passport for the purpose of security and they have right to retrieve it any time they so wish with no hesitation.</p> <p>The onsite verification found the NC effectively addressed based on documented evidence and field interviews. Hence the NC is considered closed dated 04/02/2021 with continuous implementation to be further verified in the subsequent audit.</p>

Non-conformity			
<b>NCR Ref #</b>	2019872-202011-M4	<b>Clause &amp; Category (Critical / Minor)</b>	Indicator 7.2.7 Critical
<b>Date Issued</b>	01/12/2020	<b>Due Date</b>	28/02/2021
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	04/02/2021
<b>Statement of Nonconformity:</b>	Pesticides are not storage in accordance with best practice.		
<b>Requirement Reference:</b>	Storage of all pesticides is in accordance with recognized best practices.		
<b>Objective Evidence:</b>	<p>Procedure of storage and handling of agrochemical products was available, Ref OPG-MLA-EHS-SOP-05 edited on 1st October 2013 and revised on 1st October 2017 Revision 2.</p> <p>However, although pesticides were well stored, a visit to lot 3 pesticide store found agent in-charge of the store keeping his personal clothes and drinking water inside the store with pesticides contrary to best practice.</p>		
<b>Corrections:</b>	Annual briefing to chemical storekeepers on OPG's Procedure of storage and handling of agrochemical products.		
<b>Root Cause Analysis:</b>	Lack of awareness of storekeeper on OPG's Procedure of storage and handling of agrochemical products and diligent monitoring by Health and Safety Division.		
<b>Corrective Actions:</b>	<ol style="list-style-type: none"> <li>1) Conduct briefing on OPG's Procedure of storage and handling of agrochemical products in Lot 3.</li> </ol>		

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	<p>2) Conduct an awareness briefing when a storekeeper is hired or replaced. Include annual awareness briefing to chemical storekeepers across all sites in the recurring Sustainability Development program.</p> <p>Continue to monitor compliance of all stores as part of the annual audit.</p>
<b>Assessment Conclusion:</b>	<p>Major NC close out of verification conducted on 3<sup>rd</sup> and 4<sup>th</sup> Feb. 2021.</p> <p>Olam has conducted training for the agent in-charge on 03/12/2020 on the topic; Awareness about the storage conditions of the products in the pesticide store. Subsequently, the agent has been on the same day not to store any item apart from the pesticide in the store (especially cloths, PPEs, food, drinking water). A visit to the Lot3 pesticide store and interview with the agent confirmed the training. Furthermore there was no cloths, drinking or food found in the store. A separate room has been created outside the store to be used as office and also keep such items.</p> <p>The onsite verification found the NC effectively addressed based on documented evidence and field interviews. Hence the NC is considered closed dated 04/02/2021 with continuous implementation to be further verified in the subsequent audit.</p>

Non-conformity			
<b>NCR Ref #</b>	2019872-202011-N1	<b>Clause &amp; Category (Critical / Minor)</b>	Indicator 6.7.2 Minor
<b>Date Issued</b>	01/12/2020	<b>Due Date</b>	28/02/2021
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	04/02/2021
<b>Statement of Nonconformity:</b>	First aid equipment and accident records not fully implemented		
<b>Requirement Reference:</b>	Accident and emergency procedures are in place and instructions are clearly understood by all workers. Accident procedures are available in the appropriate language of the workforce. Assigned operatives trained in first aid are present in both field and other operations, and first aid equipment is available at worksites. Records of all accidents are kept and periodically reviewed.		
<b>Objective Evidence:</b>	OPG has distributed first aid kits to trained first aiders, however a visit to estate 14 block V103 found first aid box used by the pesticides applicators virtually empty. Also some accident records sighted were not fully completed with their immediate causes and action. Sample sighted include accident on employees with employment number; 029410 – 18/06/2020, 021654 - 02/04/2020, 037114 - 01/04/2020, 015808 - 01/04/2020, 047262 - 26/05/2020, 035234 - 27/05/2020, 015553 - 29/05/2020.		
<b>Corrections:</b>	Distribution of first aid kits to sites according to normal schedule is interrupted due to on-going strike in custom and goods procured is on hold. Lack of involvement of operations team and lack of monitoring of Health and Safety Division on distribution and replacement of first aid kits.		
<b>Root Cause Analysis:</b>	Distribution of first aid kits to sites according to normal schedule is interrupted due to on-going strike in custom and goods procured is on hold. Lack of		

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	involvement of operations team and lack of monitoring of Health and Safety Division on distribution and replacement of first aid kits.
<b>Corrective Actions:</b>	<ol style="list-style-type: none"> <li>1) Distribute and replace first aid kits to trained first aiders and maintain record as per SOP.</li> <li>2) Upon distribution and replacement of first aid kit each time, inform all trained first aiders on do and don't on keeping the kit e.g. do not keep medicine in the kit, process to replace used items in the kit.</li> <li>3) Conduct regular checks by operation supervisors and random checks by Health and Safety Division as part of their weekly task on components of first aid kit in the field.</li> <li>4) Include annual first aid training to identified field personnel into SD program.</li> <li>5) Complete the accident reports by including the immediate causes</li> </ol>
<b>Assessment Conclusion:</b>	<p>Major NC close out of verification conducted on 3<sup>rd</sup> and 4<sup>th</sup> Feb. 2021.</p> <p>Olam has conducted First Aid training for the CDQ (Team Leader). The training was also done for another team leader who was on her annual leave and has not benefited from the 2020 refresher training. The training was conducted on 21/01/2021 with training material sited. The training was conducted by the residence Doctor. Subsequently, signed sheet to signify distribution of a new first aid kit to both trainers was sighted. Interview with both team leaders confirmed the refresher training. Also review of their first aid kit established compliance.</p> <p>Regarding accident records, Olam has completed the forms with their immediate causes and action and explained they were oversight on the part of the team leader who are tasked to completed them. Sighted include employment number; 029410 – 18/06/2020, 021654 - 02/04/2020, 037114 - 01/04/2020, 015808 - 01/04/2020, 047262 - 26/05/2020, 035234 - 27/05/2020, 015553 - 29/05/2020 with all the immediate causes and action fully completed.</p> <p>Correction action plan is accepted. Effectiveness of corrective action taken will be further verified in the next assessment</p>

Opportunity for Improvements	
OFI #	Description
<b>OFI 1</b>	<p><b><u>Indicator 7.12.6</u></b></p> <p>All rare, threatened or endangered (RTE) species are protected, whether or not they are identified in an HCV assessment.</p> <p>A programme to regularly educate the workforce about the status of RTE species is in place. Appropriate disciplinary measures are taken and documented in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect, trade, possess or kill these species.</p> <p><b>Details:</b> OPG to intensify its HCV sensitization to the entire workforce on the need to maintain the HCVs especially RTEs.</p>
<b>OFI 2</b>	<p><b><u>Indicator 3.4.3</u></b></p>

	<p>The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way.</p> <p><b>Details:</b> OPG is yet to review the management and monitoring plans with the affected stakeholders sighting covid-19 restrictions as the reason the review is yet to be done.</p>
<b>OFI 3</b>	<p><b><u>Indicator 7.8.1</u></b></p> <p>A water management plan is in place and implemented to promote more efficient use and continued availability of water sources and to avoid negative impacts on other users in the catchment. The plan addresses the following:</p> <p>a) The unit of certification does not restrict access to clean water or contribute to pollution of water used by communities.</p> <p>Workers have adequate access to clean water.</p> <p><b>Details:</b> Olam conduct water analysis on all drinking water, however regular checks on the chlorine dosing pump to ensured that it functions correctly and pumping the right amount of chlorine for safe drinking water would be appropriate.</p>
<b>OFI 4</b>	<p><b><u>Indicator 7.8.3</u></b></p> <p>Mill effluent is treated to be in compliance with national regulations. Discharge quality of mill effluent, especially Biochemical Oxygen Demand (BOD), is regularly monitored.</p> <p><b>Details:</b> Olam is yet to receive its POME analysis result conducted 29/06/2020. However previous analysis conducted 25/11/2019 showed BOD = 4800mg/l and COD = 6500mg/l. The BOD was found to be below the national parameter of 5000 mg/l. OPG is however not discharging the POME into the open environment i.e. water body or swamps but into the plantation as fertigation.</p>
<b>OFI 5</b>	<p><b><u>Indicator 4.4.6</u></b></p> <p>There is evidence that implementation of agreements negotiated through FPIC is annually reviewed in consultation with affected parties.</p> <p><b>Details:</b> OPG is yet to review its social contract with communities sighting covid-19 restrictions as the reason.</p>
<b>OFI 6</b>	<p><b><u>Indicator 1.1.4</u></b></p> <p>Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by a nominated management official.</p> <p><b>Details:</b> OPG could improve on its records of register for request and information given to all villages.</p>
<b>OFI 7</b>	<p><b><u>Indicator 6.2.5</u></b></p> <p>The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food.</p> <p><b>Details:</b> OPG could improve on transportation of contract workers in accessing food and other essentials outside the camp.</p>



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Positive Findings	
PF #	Description
PF 1	Good implementation of procedure at the POM and Plantation
PF 2	Well-kept Palm Oil Mill
PF 3	Proper organization of document and files
PF 4	Extensive implementation of training program as it was demonstrated through staff interviews.

**3.4.1 Status of Nonconformities Previously Identified and Observations**

Non-conformity			
<b>NCR Ref #</b>	1849207-201909-M1	<b>Clause &amp; Category (Major / Minor)</b>	Indicator 3.6.1 Major
<b>Date Issued</b>	25/11/2019	<b>Due Date</b>	22/02/2020
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	05/02/2020
<b>Statement of Nonconformity:</b>	Implementation of risk assessment for all operations were not effectively demonstrated		
<b>Requirement Reference:</b>	All operations are risk assessed to identify H&S issues. Mitigation plans and procedures are documented and implemented.		
<b>Objective Evidence:</b>	Mill operation (risk assessment register dated 7/7/19) - Review of risk assessment after accident occurrence. Accident dated 2/8/19 (maintenance) and 20/10/19 (cleaning activity). Plantation (risk assessment register dated 10/10/19) - Spraying at immature area (heat stress, ergonomic hazard) - Harvesting (ergonomic hazard) - Landfill operation		
<b>Corrections:</b>	<ul style="list-style-type: none"> <li>i) Compile and analyze 2019 LTA record to identify causes of accidents.</li> <li>ii) Review risk assessment to mitigate causes of past accidents (2019).</li> <li>iii) Review current plantation risk assessments to cover all types of operation activities: - Spraying at immature area (heat stress, ergonomic hazard) - Harvesting (ergonomic hazard) - Landfill operation - Construction</li> </ul>		
<b>Root Cause Analysis:</b>	<ul style="list-style-type: none"> <li>i) Annual review of risk assessment based on accident occurrence was not conducted.</li> <li>ii) Risk assessment does not comprehensively cover all activities in plantation.</li> </ul>		
<b>Corrective Actions:</b>	<ul style="list-style-type: none"> <li>1. Conduct annual review during beginning of each year to revise risk assessment based on accident occurrence of previous year.</li> <li>2. Review plantation risk assessment to cover all activities in immature and mature plantation (spraying in immature in Lot 3, harvesting and landfill) and other temporary activities such as construction of KCP in Lot 1 and infrastructure in Lot 3. Major NC close out verification: Risk assessment for plantation operation dated 15/1/20 was verified. The latest review of risk assessment has included spraying at immature area (heat stress, ergonomic hazard) and harvesting (ergonomic hazard). Appropriate control measures have been determined to update the existing control and further reduce the</li> </ul>		



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	<p>risk. HIRARC for landfill operation has been included based on register dated 30/1/20. 3 main activities from collection of waste from source (housing, workshop and office), transportation and storage. Appropriate control measures have been determined for high and extreme risk.</p> <p>Based on ESH annual review of accident for lot 1 and 3, action plan for the most frequent accident occurrence is established as reference to further reduce the LTA. HIRARC review will be done for repetitive accident that occurred in the plantation. Bilala POM - Risk assessment dated 30/12/19 has included the review of last accident in August and October 2019 and evaluated as moderate and low risk. Appropriate control measures on PPE and training were given to the respective workers. The new construction of KCP was also included in the register as part of the new ongoing project in Mouila lot 1.</p> <p>Based on the evaluation done, 1 (one) high risk has been identified for the installation/construction of kernel silo. Inspection of work site by QSHE personnel and PTW will be applied as part of control measure.</p>
<b>Assessment Conclusion:</b>	<p>Major NC onsite verification:</p> <p>Risk assessment for plantation operation dated 15/1/20 was verified. The latest review of risk assessment has included spraying at immature area (heat stress, ergonomic hazard) and harvesting (ergonomic hazard). Appropriate control measures have been determined to update the existing control and further reduce the risk.</p> <p>HIRARC for landfill operation has been included based on register dated 30/1/20. 3 main activities from collection of waste from source (housing, workshop and office), transportation and storage. Appropriate control measures have been determined for high and extreme risk. Based on ESH annual review of accident for lot 1 and 3, action plan for the most frequent accident occurrence is established as reference to further reduce the LTA. HIRARC review will be done for repetitive accident that occurred in the plantation.</p> <p>Bilala POM - Risk assessment dated 30/12/19 has included the review of last accident in August and October 2019 and evaluated as moderate and low risk. Appropriate control measures on PPE and training were given to the respective workers. The new construction of KCP was also included in the register as part of the new ongoing project in Mouila lot 1. Based on the evaluation done, 1 (one) high risk has been identified for the installation/construction of kernel silo. Inspection of work site by QSHE personnel and PTW will be applied as part of control measure.</p> <p>Based on ESH annual review of incidents, only 4 accidents occurred in 2019 at Bilala POM. HIRARC review was done for all accident and included in register dated 30/12/19.</p> <p>Based on evidence verification, the NC is found to be effective closed on 5/2/20 with sufficient evidence of implementation. Continuous implementation will be further verified in the next surveillance audit.</p> <p>ASA3 Verification:</p> <p>Bilala POM is in continuous compliance to the indicator. See current evidence under 3.6.1. Hence NC still remain closed.</p>

<b>Non-conformity</b>			
<b>NCR Ref #</b>	1849207-201909-M2	<b>Clause &amp; Category</b>	Indicator 3.6.2

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		<b>(Major / Minor)</b>	Major
<b>Date Issued</b>	25/11/2019	<b>Due Date</b>	22/02/2020
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	05/02/2020
<b>Statement of Nonconformity:</b>	H&S plan to address health and safety risks to people was not effectively monitored.		
<b>Requirement Reference:</b>	The effectiveness of the H&S plan to address health and safety risks to people is monitored.		
<b>Objective Evidence:</b>	<p>Observed unsafe/condition;</p> <p>i) Workers were standing in the truck without proper seat and protection. Location: PK19 entrance</p> <p>ii) Improper use of safety boot while doing work. Location: estate 12 centralized workshop</p>		
<b>Corrections:</b>	<p>i) Policy briefing to all contractors (including transportation) during renewal of contract i.e. Jan 2020.</p> <p>ii) Contractor shall acknowledge understanding of Olam’s policy through a documented record attached with their valid contract – date of briefing, name of contractor, policies briefed, signature.</p> <p>iii) Raise PPE awareness briefing to all workforce and operators at all facilities.</p>		
<b>Root Cause Analysis:</b>	<p>i) Olam safety policy including transportation safety policy are not respected by contractor trucks.</p> <p>ii) All contractor trucks are registered with central workshop, however safety examination by respective workshop does not include proper rain cover and benches.</p> <p>iii) Awareness of right use of PPE is lacking amongst workforce.</p>		
<b>Corrective Actions:</b>	<ol style="list-style-type: none"> <li>1. During renewal of contract in Jan 2020, briefing on all relevant Olam policies. - Safety policy - Environment policy - Fair employment policy - Human Rights policy - Whistle Blowing Policy - And other updated Olam’s policies</li> <li>2. Briefing record (date, name of contractor, type of policies briefing, signature) to be attached with the renewed contract.</li> <li>3. All camion provided by transportation contractors is checked by workshop to ensure provision of rain cover and benches by 15 Jan 2020. Camion which are not fully equipped could not be used for Olam transportation after 15 Jan 2020.</li> <li>4. Continue to monitor condition of all contractor camion through monthly HR monitoring, any contractor in breach of Olam’s policy will be suspended.</li> <li>5. Conduct right use of PPE to all workforce during muster and provide awareness poster on PPE use at facilities i.e. biometric center, workshop, clinic, stores, mill and office.</li> </ol>		
<b>Assessment Conclusion:</b>	<p>Major NC close out verification:</p> <p>Verified policy briefing given to contractors during contract signing for renewal. All Olam’s policies were briefed to contractor on 18/1/20. Evidence of meeting minute dated 18/1/20 was sighted. Details of company’s policies, rules and regulations were explained and acknowledged by the contractors. Acknowledgement letter/declaration by transporter (Geotechnics and DGNS) were evident.</p>		

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	<p>Camion inspection was done on day basis to ensure provision of rain cover and benches. Camion which are not fully equipped could not be used for Olam transportation after 15 Jan 2020. Verified safety inspection records by ESH team dated 28 and 29 January 2020 for camion registration number (AK 142 AA, EW-313-AA, DH-345-AA, EP-393-AA, HC-881-AA, BC-269-AA) which belong to transporter. All camion inspected was found to be in compliance with the new rules.</p> <p>Workers PPE training/briefing was done on 30/1/20 at lot 3 Moutassou attended by all workshop operator and personnel. Records of training/briefing was verified. PPE issuance record for safety boots/shoes dated 30/1/20 was evidently recorded and acknowledge by the workshop personnel.</p> <p>Based on evidence verification, the NC is found to be effectively closed on 5/2/20 with sufficient evidence of implementation. Continuous implementation will be further verified in the next surveillance audit.</p> <p>ASA3 Verification: Bilala POM is in continuous compliance to the indicator. See current evidence under 3.6.2. Hence NC still remain closed.</p>
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Non-conformity			
<b>NCR Ref #</b>	1849207-201909-M3	<b>Clause &amp; Category (Major / Minor)</b>	Indicator 1.1.4 Major
<b>Date Issued</b>	25/11/2019	<b>Due Date</b>	22/02/2020
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	05/02/2020
<b>Statement of Nonconformity:</b>	Consultation and communication procedures are not implemented effectively.		
<b>Requirement Reference:</b>	Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by a nominated management official.		
<b>Objective Evidence:</b>	Stakeholders Communication Guideline with Doc. No.: GUI NO 01/CRS/MOUILA/0919, Rev. 0 dated 1 September 2019 was developed. However, interviewed with the Social Responsible found that they are not aware of the guidelines and have yet to implement the guideline since 1 September 2019. Interview with Forestry Department and local communities further confirm that they are not aware on the procedure to request for documentation and information.		
<b>Corrections:</b>	i) CRS to disseminate below SOP to impacted villages with a letter of acknowledgement and contact details from OPG, a copy of this info to be sent to relevant authorities (MoF and Prefet) in Mouila: <ul style="list-style-type: none"> <li>- Procedure de Consultation et de Communication avec les Communautés Locales - Procedure de Gestion des Demandes d'Information</li> <li>- Procedure Sur Le Consentement Libre Informe et Prealable (CLIP)</li> <li>- Procedure de Gestion des Plaintes et Reclamations</li> </ul>		

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	<ul style="list-style-type: none"> <li>- Grievance Procedures</li> <li>- Updated Human Rights Policy</li> <li>- Whistle Blowing Policy</li> </ul> <p>ii) HR to disseminate below SOP to delegate and Gender Committee with a letter of acknowledgement and contact details from OPG, a copy of this info to be sent to relevant authorities (Labour Department) in Mouila:</p> <ul style="list-style-type: none"> <li>- Grievance Procedures</li> <li>- All Delegate meeting minutes in 2019</li> <li>- Updated FEP and Human Rights Policy</li> <li>- Whistle Blowing Policy</li> </ul> <p>iii) Provide manual record of external complaint cases if Socprog could not be effectively used due to system issue.</p> <p>iv) Assign specific contact point for internal complaint receipt in the Grievance Procedure. Focal point shall ensure implementation of complaint management flow chart according to specific the timeline.</p> <p>v) Review current grievance procedure to allow manual record of external complaint, to include possibility of appeal by complainant for internal complaint and includes the option of access to independent legal and technical advice, the ability for complainants to choose individuals or groups to support them and/or act as observers, as well as the option of a third-party mediator. Internal stakeholders should include residents of G10 housing, contractor workforce and foreign workforce.</p> <p>vi) Communicate revised grievance procedure.</p> <p>vii) Conduct annual analysis of internal and external complaint to ensure procedure are implemented accordingly or revise procedure if issues are raised as part of the analysis by end of the year e.g. Socprog issue.</p>
<b>Root Cause Analysis:</b>	<p>i) The Stakeholders Communication Guideline (GUI NO 01/CRS/MOUILA/0919) Rev. 0 dated 1 September 2019 comprises of various communication SOPs that are owned by different units.</p> <p>ii) Communication of each relevant SOPs to relevant stakeholders are not specified during circulation of new guideline.</p>
<b>Corrective Actions:</b>	<p>i) Review current grievance procedure to allow manual record of external complaint, to include possibility of appeal by complainant for internal complaint and includes the option of access to independent legal and technical advice, the ability for complainants to choose individuals or groups to support them and/or act as observers, as well as the option of a third-party mediator. Internal stakeholders should include contractor workforce and foreign workforce.</p> <p>ii) Communicate revised procedure (flow chat and contact person) to all internal/ external stakeholders (Delegate, Gender Committee, Community Steering Committee) and display at permanent facilities i.e. biometric center, office and mill.</p> <p>iii) Conduct annual review of all closed and open grievance cases by Director of Human Resources. Summary of cases (total complaint received for past one-year, nature of complaint, total closed case, total open cases) for all sites (Awala, Makouke, Mouila and Ndende) will be provided by Director of Human</p>

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	Resources to OPG Vice President, Deputy Site Head and copied to CRS Regional Manager by end of the year.
<b>Assessment Conclusion:</b>	<p>Major NC close out verification:</p> <p>The newly revised procedure dated 15/1/20 has been communicated to the relevant stakeholders in lot 1 on 21 and 27 January 2020. The same session was also given at lot 3 for their external stakeholders. Verified records of attendance and acknowledgement for the said session.</p> <p>Based on evidence verification, the NC is found to be effectively closed on 5/2/20 with sufficient evidence of implementation. Continuous implementation will be further verified in the next surveillance audit.</p> <p>ASA3 Verification:</p> <p>Bilala POM is in continuous compliance to the indicator. However, as part for the communication, register of all communication need to be available with communities. Much as the communities confirmed they knowledge of the regsier they mentioned they are yet to receive. COPG however has a contrary view as they claimed all register has been placed in the communities. NC however remain closed but OFI is being raised for OPG to keep documented evidence. See current evidence under 1.1.4.</p>

Non-conformity			
<b>NCR Ref #</b>	1849207-201909-M4	<b>Clause &amp; Category (Major / Minor)</b>	SCCS 5.3.2 Major
<b>Date Issued</b>	25/11/2019	<b>Due Date</b>	22/02/2020
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	05/02/2020
<b>Statement of Nonconformity:</b>	Corrective action plan has yet to be developed with identified root cause analysis and corrective action.		
<b>Requirement Reference:</b>	<p>The site shall have a written procedure to conduct annual internal audit to determine whether the organisation;</p> <ul style="list-style-type: none"> <li>• Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.</li> <li>• Effectively implements and maintains the standard requirements within its organisation. Any non-conformities found as part of the internal audit shall be issued corrective action. The outcomes of the internal audits and all actions taken to correct non- conformities shall be subject to management review at least annually. The organisation shall be able to maintain the internal audit records and reports</li> </ul>		
<b>Objective Evidence:</b>	RSPO & ISCC Action Plan was developed for 3 non-conformities raised during internal audit. The action plan has included details of follow-up action and details of progress. However, there was no root cause analysis and corrective action been identified.		
<b>Corrections:</b>	Revise 2019 internal audit report to include root cause analysis for 3 findings. Update the internal audit report to mill management review committee.		

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<b>Root Cause Analysis:</b>	The internal audit procedure defined in SCCS SOP does not include root cause analysis as part of audit template.
<b>Corrective Actions:</b>	<ul style="list-style-type: none"> <li>i) Review internal audit procedure to define elements required in the internal audit report template.</li> <li>ii) Review internal audit report 2019 to include all elements defined in the procedure. Major NC close out verification: The newly revised SOP for internal audit dated 15/1/20 was verified. Under section 7 (internal audit process: 7.5) has explained on the requirement of root cause analysis in corrective action plan. New reporting template for internal audit report has incorporated the root cause analysis part and action plan.</li> </ul>
<b>Assessment Conclusion:</b>	<p>Major NC close out verification:</p> <p>The newly revised SOP for internal audit dated 15/1/20 was verified. Under section 7 (internal audit process: 7.5) has explained on the requirement of root cause analysis in corrective action plan. New reporting template for internal audit report has incorporated the root cause analysis part and action plan. Based on evidence verification, the NC is found to be effectively closed on 5/2/20 with sufficient evidence of implementation. Continuous implementation will be further verified in the next surveillance audit.</p> <p>ASA3 Verification:</p> <p>Bilala POM is in continuous compliance to the indicator. See current evidence under 3.8.6. Hence NC still remain closed.</p>

<b>Non-conformity</b>			
<b>NCR Ref #</b>	1849207-201909-M5	<b>Clause &amp; Category (Major / Minor)</b>	Indicator 4.1.1 Major
<b>Date Issued</b>	25/11/2019	<b>Due Date</b>	22/02/2020
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	05/02/2020
<b>Statement of Nonconformity:</b>	Human rights policy has yet to be communicated to all levels of the workforce, operations, supply chain and local communities.		
<b>Requirement Reference:</b>	A policy to respect human rights, including prohibiting retaliation against Human Rights Defenders (HRD), is documented and communicated to all levels of the workforce, operations, supply chain and local communities and prohibits intimidation and harassment by the unit of certification and contracted services, including contracted security forces.		
<b>Objective Evidence:</b>	Olam Palm Gabon has established Human Rights Policy approved on 1 September 2019. The policy has not been communicated to the relevant stakeholders such as internal employees and local communities as informed by the Social Responsible and confirmed by interviewed with the local communities.		
<b>Corrections:</b>	<ul style="list-style-type: none"> <li>i) Disseminate and brief Human Rights policy to relevant stakeholders including impacted villages, workers delegate, Gender Committee.</li> </ul>		

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	ii) Any future update on Olam’s policy will need to be circulated and communicated to relevant stakeholders.
<b>Root Cause Analysis:</b>	Updated policies are not communicated to impacted villages, workers delegate, Gender Committee and are not displayed at Olam’s facilities
<b>Corrective Actions:</b>	i) Display updated Human Rights Policy at biometric center, office and mill. ii) Any future update on Olam’s policy will need to be updated in Olam’s new employee’s induction briefing. iii) Any future update on Olam’s policy will need to be circulated to respective stakeholders: - Workers delegate - Gender Committee - Impacted villages via community steering committee - Relevant authorities iv) Updated policies to be briefed to contractor during contract renewal
<b>Assessment Conclusion:</b>	<p>Major NC close out verification:            Policy briefing was given to external stakeholders (villagers in lot 1 and lot 3 ) on 21 &amp; 27 January 2020 (lot 1) and a few session in January and February 2020. Verified the acknowledgement from the stakeholders for the said session. All related procedures and policies were briefed to the external stakeholders. Based on evidence verification, the NC is found to be effectively closed on 5/2/20 with sufficient evidence of implementation. Continuous implementation will be further verified in the next surveillance audit.</p> <p>ASA3 Verification:            Bilala POM is in continuous compliance to the indicator. See current evidence under 4.1.1. Hence NC still remain closed.</p>

Non-conformity			
<b>NCR Ref #</b>	1849207-201909-M6	<b>Clause &amp; Category (Major / Minor)</b>	Indicator 6.2.2 Major
<b>Date Issued</b>	25/11/2019	<b>Due Date</b>	22/02/2020
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	11/02/2020
<b>Statement of Nonconformity:</b>	Employment contracts and related documents detailing payments and conditions of employment (e.g. regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. in compliance with national legal requirements) are not properly documented.		
<b>Requirement Reference:</b>	Employment contracts and related documents detailing payments and conditions of employment (e.g. regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. in compliance with national legal requirements) and payroll documents give accurate information on compensation for all work performed, including work done by family members.		



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<p><b>Objective Evidence:</b></p>	<p>Sampled employment contract for Contrat A Duree Determinee (CDD) found that the period has exceeded 2 years as per the Gabon - Code du travail 1994 as below:</p> <ul style="list-style-type: none"> <li>i) Employee No.: 052963 (joined on 9/1/2018; period: 21/7/2018 – 20/1/2020)</li> <li>ii) Employee No.: 063292 (joined on 9/1/2018; period: 21/7/2018 – 20/1/2020)</li> <li>iii) iii. Employee No.: 052456 (joined on 13/12/2017; period: 21/6/2018 – 20/12/2020)</li> <li>iv) iv. Employee No.: 052058 (joined on 5/12/2017; period: 21/6/2018 – 20/12/2020) v. Employee No.: 052506 (joined on 15/12/2017; period: 21/6/2018 – 20/12/2020)</li> </ul> <p>Document reviewed on the employment contract for contractors’ workers found that wages (rate per piece), sick leave, holiday entitlement and maternity leave has yet to be included in the employment contract. Besides, there was no specific fixed-term period for the Contrat A Duree Determinee (CDD) workers stated in the employment contract for contractors’ workers. Sampled of the employment contracts as below:</p> <ul style="list-style-type: none"> <li>i. CNSS No.: 001-1118794-4 (Lot 3)</li> <li>ii. CNSS No.: 040-1404488-8 (Lot 3)</li> <li>iii. CNSS No.: 040-1404486-6 (Lot 3)</li> <li>iv. CNSS No.: 040-1404490-0 (Lot 3)</li> <li>v. CNSS No.: 004-1389414-4 (Lot 3)</li> <li>vi. CNSS No.: 004-1388026-6 (Lot 3)</li> <li>vii. CNSS No.: 004-1388511-1 (Lot 3)</li> <li>viii. CNSS No.: 004-1326871-1 (Lot 1)</li> <li>ix. CNSS No.: 004-1327279-9 (Lot 1)</li> <li>x. CNSS No.: 004-1257208-8 (Lot 1)</li> <li>xi. CNSS No.: 004-1285556-6 (Lot 1)</li> </ul>
<p><b>Corrections:</b></p>	<ul style="list-style-type: none"> <li>i) HR/ legal department to advise minimum terms and appropriate language to be included in the contractor workers contracts.</li> <li>ii) Contractor must update will workers contract with above specified elements.</li> <li>iii) All Olam’s CDD contract will need to specify period of employment i.e. valid for two years upon signing of contract.</li> <li>iv) Changes in the CDD contract to be initial/ sign by respective workers.</li> <li>v) Briefing of new RSPO requirement to HR.</li> </ul>
<p><b>Root Cause Analysis:</b></p>	<ul style="list-style-type: none"> <li>i) Contract template Lack of detailed check on each contractor workers contract.</li> <li>ii) Lack of specific fixed-term period in CDD contract.</li> <li>iii) Relevant PIC i.e. HR is not fully aware of new RSPO specified requirements.</li> </ul>
<p><b>Corrective Actions:</b></p>	<p>Circulate and explain new RSPO requirements to HR mangers on site.</p>
<p><b>Assessment Conclusion:</b></p>	<p>Major NC close out verification: The template for the new contract of employment has been finalized. Briefing to the contractors were carried out on 18/1/20 (1st meeting) and (2nd session) 3/2/20 to explain of the contract of employment terms and conditions. Verified the new contract signed for contractor's workers.</p>



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	<p>For Olam workers which previously hired under CDD were upgraded to CDI workers category. Verified sample of employment contract signed for (063292, 052058, 052456 and 052506). Briefing session with to HR department was carried out on 16/1/20 on the new RSPO requirements. Based on evidence verification, the NC is found to be effectively closed on 11/2/20 with sufficient evidence of implementation. Continuous implementation will be further verified in the next surveillance audit.</p> <p>ASA3 Verification: Bilala POM is in continuous compliance to the indicator. See current evidence under 6.2.2. Hence NC still remain closed.</p>
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Non-conformity			
<b>NCR Ref #</b>	1849207-201909-M7	<b>Clause &amp; Category (Major / Minor)</b>	Indicator 6.5.1 Major
<b>Date Issued</b>	25/11/2019	<b>Due Date</b>	22/02/2020
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	05/02/2020
<b>Statement of Nonconformity:</b>	The Sexual Harassment in the Workplace Policy is not implemented effectively.		
<b>Requirement Reference:</b>	A policy to prevent sexual and all other forms of harassment and violence is implemented and communicated to all levels of the workforce.		
<b>Objective Evidence:</b>	Based on the interview and review on the complaint forms, it was found that a reported sexual harassment case was resolved but the complainant did not aware on the results of investigation and was not satisfied with the resolution. In this case, the respondent was issued with a warning letter. Furthermore, she is not comfortable to work in the same environment with the respondent. Based on the Sexual Harassment in Workplace Policy, the complainant did not received the report and the action taken has not considered agreement with the parties. Furthermore, after the resolution, there were no further protection to the complainant from exposing to the respondent. As such, the action taken has not demonstrated prevention and repetition of harassment.		
<b>Corrections:</b>	<ul style="list-style-type: none"> <li>i) Provide written communication of action taken to all complainant including sexual harassment case according to the Grievance Procedure.</li> <li>ii) Action taken to be acknowledged by complainant.</li> <li>iii) Update Internal Grievance Process to include possibility of appeal. If complainant is not satisfied with the action taken, appeal process can be triggered by complainant to recommend for further action e.g. in this case requesting transfer of work location by complainant.</li> </ul>		
<b>Root Cause Analysis:</b>	Closure of each sexual harassment cases (all complaint cases) is not communicated and acknowledged by the complainant according to the Grievance Procedure and grievance form template.		
<b>Corrective Actions:</b>	i) Review current internal grievance procedure to include possibility for appeal and anonymity of the complainant.		

	<p>ii) Conduct annual review of all closed and open grievance cases by Director of Human Resources. Summary of cases (total complaint received for past one-year, nature of complaint, total closed case, total open cases) for all sites (Awala, Makouke, Mouila and Ndende) will be provided by Director of Human Resources to OPG Vice President, Deputy Site Head and copied to CRS Regional Manager by end of the year.</p>
<p><b>Assessment Conclusion:</b></p>	<p>Major NC close out verification:</p> <p>Newly revised grievance procedure dated 15/1/20 was verified and has included section 7 and 9 for the flow chart on grievance resolution process. On the sexual harassment case, it has been resolved based on the written statement and during interview on site. On annual basis, a review done by HR Director for close and open case. Summary of cases (total complaint received for past one-year, nature of complaint, total closed case, total open cases) for all sites (Awala, Makouke, Mouila and Ndende) will be provided by Director of Human Resources to OPG Vice President, Deputy Site Head and copied to CRS Regional Manager by end of the year.</p> <p>Refer to the latest review done for 2019 for internal and external cases.</p> <p>Based on evidence verification, the NC is found to be effectively closed on 5/2/20 with sufficient evidence of implementation. Continuous implementation will be further verified in the next surveillance audit.</p> <p>ASA3 Verification:</p> <p>Bilala POM is in continuous compliance to the indicator. See current evidence under 6.5.1. Hence NC still remain closed.</p>

Non-conformity			
<p><b>NCR Ref #</b></p>	<p>1849207-201909-M9</p>	<p><b>Clause &amp; Category (Major / Minor)</b></p>	<p>Indicator 7.12.4 Major</p>
<p><b>Date Issued</b></p>	<p>25/11/2019</p>	<p><b>Due Date</b></p>	<p>22/02/2020</p>
<p><b>Closed (Yes / No)</b></p>	<p>Yes</p>	<p><b>Date of nonconformity Closure</b></p>	<p>05/02/2020</p>
<p><b>Statement of Nonconformity:</b></p>	<p>Management plan has not been implemented sufficiently.</p>		
<p><b>Requirement Reference:</b></p>	<p>Where HCVs, HCS forests after 15 November 2018, peatland and other conservation areas have been identified, they are protected and/or enhanced. An integrated management plan to protect and/or enhance HCVs, HCS forests, peatland and other conservation areas is developed, implemented and adapted where necessary, and contains monitoring requirements. The integrated management plan is reviewed at least once every five years. The integrated management plan is developed in consultation with relevant stakeholders and includes the directly managed area and any relevant wider landscape level considerations (where these are identified).</p>		
<p><b>Objective Evidence:</b></p>	<p>As per the water management plan approved on 27/04/2019, it was stated that water sampling at upstream, in-site and downstream is regularly conducted. However, there was only 1 water sampling conducted in 2018 on 13/06/2018. This</p>		

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	is not accordance to the HCV recommendation plan. Another sample was taken from the HCV recommendation plan that to set restoration goal (natural regrowth) for riparian zone with 5 years milestones which are not within the Environment and Social Management Plan dated June 2015.
<b>Corrections:</b>	<ul style="list-style-type: none"> <li>i) Consolidate water test program (treated and surface) for all OPG sites.</li> <li>ii) Communicate annual program with Lebamba laboratory to organize trip to each site to take sample and analyze.</li> </ul>
<b>Root Cause Analysis:</b>	No annual water test program for all sites and water test is conducted as per demand from QEHS (treated water) and CRS (surface water).
<b>Corrective Actions:</b>	<ul style="list-style-type: none"> <li>i) Establish timetable for annual water test program for all sites.</li> <li>ii) Communicate and agree with Lebamba lab on the annual program for lab to organise materials and expertise required.</li> <li>iii) In case of any program change i.e. additional water test, road closure and disruption, delay from external lab, appoint new closet date to complete program and coordinate with onsite CRS manager/ EHS manager and keep MD informed to follow up.</li> </ul>
<b>Assessment Conclusion:</b>	<p>Major NC close out verification:</p> <p>Communication will Lebamba lab on water testing programme was verified based on email dated 21/12/20. Drinking water analysis will be done by Lebamba lab on monthly basis. External party (SEENEX) will conduct surface water analysis and government lab for POME analysis. Frequency of analysis is one per year.</p> <p>Based on evidence verification, the NC is found to be effectively closed on 5/2/20 with sufficient evidence of implementation. Continuous implementation will be further verified in the next surveillance audit.</p> <p>ASA3 Verification:</p> <p>Bilala POM is in continuous compliance to the indicator. See current evidence under 7.12.4. Hence NC still remain closed.</p>

Non-conformity			
<b>NCR Ref #</b>	1849207-201909-N1	<b>Clause &amp; Category (Major / Minor)</b>	Indicator 7.8.3 Minor
<b>Date Issued</b>	25/11/2019	<b>Due Date</b>	Next ASA
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	1/12/2020
<b>Statement of Nonconformity:</b>	Discharge quality of mill effluent was not in compliance with the prescribed limit.		
<b>Requirement Reference:</b>	Mill effluent is treated to be in compliance with national regulations. Discharge quality of mill effluent, especially Biochemical Oxygen Demand (BOD), is regularly monitored.		
<b>Objective Evidence:</b>	BOD for treated effluent analysis result dated 24/9/19 recorded at 8000 mg/l vs prescribed limit of 5,000 mg/l for land irrigation.		

<b>Corrections:</b>	Re-conduct POME sampling from final pond and ensure result below 5000ppm.
<b>Root Cause Analysis:</b>	According to Mill SOP section 13 ETP, POME sampling should be despatched immediately after sampling, maintained temperature between 0-10 C to accredited laboratory. However, due to distance of mill and accredited lab located in Libreville, sample despatch could only arrive within a day, maintained in room temperature
<b>Corrective Actions:</b>	<ul style="list-style-type: none"> <li>i) When Lebamba lab is accredited by 2021, POME sample should be sent to nearer lab i.e. Lebamba lab.</li> <li>ii) While location of accredited lab is not possible to access immediately, samples must be sent in a cold box from mill to lab.</li> </ul>
<b>Assessment Conclusion:</b>	<p>Corrective action plan is accepted. Effectiveness of corrective action taken will be further verified in the next audit.</p> <p>ASA3 Verification:</p> <p>Bilala POM demonstrated compliance to the indicator based on corrective action plan submitted. See current evidence under 7.8.3. Hence NC is considered closed.</p>

<b>Non-conformity</b>			
<b>NCR Ref #</b>	1849207-201909-N2	<b>Clause &amp; Category (Major / Minor)</b>	Indicator 6.7.2 Minor
<b>Date Issued</b>	25/11/2019	<b>Due Date</b>	Next ASA
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	1/12/2020
<b>Statement of Nonconformity:</b>	Accident and emergency procedures was not effectively implemented.		
<b>Requirement Reference:</b>	Accident and emergency procedures are in place and instructions are clearly understood by all workers. Accident procedures are available in the appropriate language of the workforce. Assigned operatives trained in first aid are present in both field and other operations, and first aid equipment is available at worksites. Records of all accidents are kept and periodically reviewed		
<b>Objective Evidence:</b>	<ul style="list-style-type: none"> <li>i) Accident investigation and LTA reporting - No declaration of accident and investigation done for accident involving Indonesian Foreign Worker (IFW) dated 27/6/19 (estate 14) - Discrepancies of LTA reported for the case dated 14/5/19 (worker ID: 000805) and 29/5/19 (worker ID: 52476). Further verification made with medical doctor at Mboukou Clinic, no medical leave given to both workers contrary with LTA recorded by EHS department.</li> <li>ii) Trained first aider was not available at site, for spraying gang at block Z80 (estate 1). No evidence to show that CDQ has received any first aid training.</li> </ul>		
<b>Corrections:</b>	Prepare monthly accident treatment report from Clinic to EHS managers. EHS managers to ensure all LTA cases are reported.		
<b>Root Cause Analysis:</b>	i) LTA record and clinic treatment record are not coordinated to ensure all accidents are reported and risk assessed.		

	ii) First aid training was conducted on in 2019. High turnover and absenteeism of workforce requires repeated first aid training to all CDQ on periodic basis.
<b>Corrective Actions:</b>	<p>i) Ensure treatment reports on accident cases are submitted to EHS manager for risk assessment on monthly basis.</p> <p>ii) EHS will conduct root cause analysis, risk assessment and follow up action such as training if required.</p> <p>ii) Conduct first aid training to Lot 1 and Lot 3 CDQ and operators at permanent facilities at least two times a year i.e. May 2020 and Oct 2020.</p>
<b>Assessment Conclusion:</b>	<p>Correction action plan is accepted. Effectiveness of corrective action taken will be further verified in the next assessment</p> <p>ASA3 Verification: Bilala POM demonstrated compliance to the indicator based on corrective action plan submitted. See current evidence under 6.7.2. Hence NC is considered closed.</p>

Non-conformity			
<b>NCR Ref #</b>	1849207-201909-N3	<b>Clause &amp; Category (Major / Minor)</b>	Indicator 6.7.4 Minor
<b>Date Issued</b>	25/11/2019	<b>Due Date</b>	Next ASA
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	01/12/2020
<b>Statement of Nonconformity:</b>	Process of accident insurance claim was not effective.		
<b>Requirement Reference:</b>	All workers are provided with medical care and covered by accident insurance. Costs incurred from work-related incidents leading to injury or sickness are covered in accordance with national law or by the unit of certification where national law does not offer protection		
<b>Objective Evidence:</b>	No declaration of accident and investigation done for accident involving Indonesian Foreign Worker (IFW) dated 27/6/19. 3 LTA recorded for the incident. No evidence of claim or compensation made to the said worker.		
<b>Corrections:</b>	Prepare monthly accident treatment report from Clinic to EHS managers.		
<b>Root Cause Analysis:</b>	LTA record and clinic treatment record are not coordinated to ensure all accidents are reported and insurance are claimed		
<b>Corrective Actions:</b>	<p>i) Ensure treatment reports on accident cases are submitted to EHS manager for risk assessment on monthly basis and insurance claimed are submitted if appropriate.</p> <p>ii) EHS managers to ensure all LTA cases are reported and request for insurance claim from HR and Finance if appropriate.</p> <p>iii) HR managers to submit medical claims for CNSS while finance team to submit insurance claims from HQ Great Eastern for all foreign workforce.</p>		
<b>Assessment Conclusion:</b>	Correction action plan is accepted. Effectiveness of corrective action taken will be further verified in the next assessment		

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	<p>ASA3 Verification: Bilala POM demonstrated compliance to the indicator based on corrective action plan submitted. See current evidence under 6.7.4. Hence NC is considered closed.</p>
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Non-conformity			
<b>NCR Ref #</b>	1849207-201909-N4	<b>Clause &amp; Category (Major / Minor)</b>	Indicator 2.2.2 Minor
<b>Date Issued</b>	25/11/2019	<b>Due Date</b>	Next ASA
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	01/12/2020
<b>Statement of Nonconformity:</b>	<p>There was no specific clauses on meeting applicable legal requirements in the contractor's agreements as below:</p> <ul style="list-style-type: none"> <li>i. Contract No.: OPGM/MIR/07/19/R002 Lot 1 for truck rental with driver which valid from 1/7/2019 to 31/12/2019.</li> <li>ii. Contract No.: OPGM/MIR/07/19/013 Lot 1 for truck rental with driver which valid from 2/9/2019 to 31/12/2019.</li> </ul>		
<b>Requirement Reference:</b>	All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal requirements, and this can be demonstrated by the third party.		
<b>Objective Evidence:</b>	There was no specific clauses on meeting applicable legal requirements in the contractor's agreements as below: i. Contract No.: OPGM/MIR/07/19/R002 Lot 1 for truck rental with driver which valid from 1/7/2019 to 31/12/2019. ii. Contract No.: OPGM/MIR/07/19/013 Lot 1 for truck rental with driver which valid from 2/9/2019 to 31/12/2019.		
<b>Corrections:</b>	<ul style="list-style-type: none"> <li>i) Review and update current contract template by legal.</li> <li>ii) Renewed contract in Jan 2020 to be based on revised template.</li> </ul>		
<b>Root Cause Analysis:</b>	Contract template does not include clauses on meeting applicable legal requirements and other relevant terms according to Olam's policies such as no child labour, no trafficked labour, no forced labour.		
<b>Corrective Actions:</b>	Sign new contract in Jan with contractors based on new template approved by legal department. Briefing of new contract during signature of contract.		
<b>Assessment Conclusion:</b>	<p>Correction action plan is accepted. Effectiveness of corrective action taken will be further verified in the next assessment.</p> <p>ASA3 Verification: Bilala POM demonstrated compliance to the indicator based on corrective action plan submitted. See current evidence under 2.2.2. Hence NC is considered closed.</p>		

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Non-conformity			
<b>NCR Ref #</b>	1849207-201909-N5	<b>Clause &amp; Category (Major / Minor)</b>	Indicator 2.2.3 Minor
<b>Date Issued</b>	25/11/2019	<b>Due Date</b>	Next ASA
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	01/12/2020
<b>Statement of Nonconformity:</b>	No clauses disallowing child, forced and trafficked labour mentioned in the contract agreement with contractors.		
<b>Requirement Reference:</b>	All contracts, including those for FFB supply, contain clauses disallowing child, forced and trafficked labour. Where young workers are employed, the contracts include a clause for their protection.		
<b>Objective Evidence:</b>	<p>The sampled contract agreements found that there was no special clauses disallowing child, forced and trafficked labour and where young workers are employed, the contracts include a clause for their protection.</p> <p>i. Contract No.: OPGM/MIR/07/19/R002 Lot 1 for truck rental with driver which valid from 1/7/2019 to 31/12/2019.</p> <p>iii. Contract No.: OPGM/MIR/07/19/L007 Lot 1 for agricultural services which valid from 1/7/2019 to 31/12/2019.</p> <p>iv. Contract No.: OPGM/MIR/07/19/013 Lot 1 for truck rental with driver which valid from 2/9/2019 to 31/12/2019.</p>		
<b>Corrections:</b>	<p>i) Review and update current contract template by legal.</p> <p>ii) Renewed contract in Jan 2020 to be based on revised template.</p>		
<b>Root Cause Analysis:</b>	Contract template does not include clauses on meeting applicable legal requirements and other relevant terms according to Olam's policies such as no child labour, no trafficked labour, no forced labour		
<b>Corrective Actions:</b>	Sign new contract in Jan with contractors based on new template approved by legal department. Briefing of new contract during signature of contract.		
<b>Assessment Conclusion:</b>	<p>Correction action plan is accepted. Effectiveness of corrective action taken will be further verified in the next assessment</p> <p>ASA3 Verification: Bilala POM demonstrated compliance to the indicator based on corrective action plan submitted. See current evidence under 2.2.3. Hence NC is considered closed.</p>		

Non-conformity			
<b>NCR Ref #</b>	1849207-201909-N6	<b>Clause &amp; Category (Major / Minor)</b>	Indicator 4.2.2 Minor
<b>Date Issued</b>	25/11/2019	<b>Due Date</b>	Next ASA
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	01/12/2020



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<b>Statement of Nonconformity:</b>	Procedure of Management of Complaints and Claims was not implemented effectively.
<b>Requirement Reference:</b>	Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties.
<b>Objective Evidence:</b>	Procedure of Management of Complaints and Claims with Doc. No.: SOP N07/CRS/Mouila/ 0119, Ver. 02 dated January 2019 was developed. However, reviewed on the complaint forms received in Lot 1 on 30/8/2019 and 11/10/2019 were not registered in the SocProg software within the set timeframe as per SOP. In Moutassou Lot 3, there was a complaint received on 18/10/2019 from one of the driver related to the potential discrimination by the Manager. However, there was no evidence to show that the call-up meeting with the complainant was done within 2 days and no investigation could be taken without the call-up meeting with the complainant. The complaint is still open and unresolved.
<b>Corrections:</b>	Assign specific contact point for internal and external complaint receipt in the Grievance Procedure. Focal point shall ensure implementation of complaint management flow chart according to specific the timeline.
<b>Root Cause Analysis:</b>	<ul style="list-style-type: none"> <li>i) Complaint management for external and internal stakeholders are not followed according to the Grievance Procedure.</li> <li>ii) Awareness of stakeholder on complaint process i.e. complaint form/ complaint process is lacking.</li> </ul>
<b>Corrective Actions:</b>	<ul style="list-style-type: none"> <li>i) Review current grievance procedure to allow manual record of external complaint, to include possibility of appeal by complainant for internal complaint and includes the option of access to independent legal and technical advice, the ability for complainants to choose individuals or groups to support them and/or act as observers, as well as the option of a third-party mediator. Internal stakeholders should include contractor workforce and foreign workforce.</li> <li>ii) Communicate revised procedure (flow chat and contact person) to all internal/ external stakeholders (Delegate, Gender Committee, Community Steering Committee) and display at permanent facilities i.e. biometric center, office and mill.</li> <li>iii) Conduct annual review of all closed and open grievance cases by Director of Human Resources and CRS support team. Summary of cases (total complaint received for past one-year, nature of complaint, total closed case, total open cases) for all sites (Awala, Makouke, Mouila and Ndende) will be provided by Director of Human Resources to OPG Vice President, Deputy Site Head and respective CRS managers by end of the year.</li> </ul>
<b>Assessment Conclusion:</b>	<p>Correction action plan is accepted. Effectiveness of corrective action taken will be further verified in the next assessment.</p> <p>ASA3 Verification: Bilala POM demonstrated compliance to the indicator based on corrective action plan submitted. See current evidence under 4.2.2. Hence NC is considered closed.</p>



Non-conformity			
<b>NCR Ref #</b>	1849207-201909-N7	<b>Clause &amp; Category (Major / Minor)</b>	Indicator 4.2.3 Minor
<b>Date Issued</b>	25/11/2019	<b>Due Date</b>	Next ASA
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	01/12/2020
<b>Statement of Nonconformity:</b>	Grievance mechanism was not implemented effectively.		
<b>Requirement Reference:</b>	The unit of certification keeps parties to a grievance informed of its progress, including against agreed timeframe and the outcome is available and communicated to relevant stakeholders.		
<b>Objective Evidence:</b>	<p>During the interview with villagers, it was informed that there are elephant attack on their crops. Such grievance has been informed to OPG CRS team. However there are no records found of such grievance. CRS team informed the assessment team that these shall be managed by the Authorities. Despite that it shall be managed by the Authorities, OPG has not able to demonstrate the execution of dealing with complaints or grievances received.</p> <p>Furthermore, the assessment team during Mboukou housing visit found that one of the florescent light in the living room was not in place and water-tap in the toilet was leaking. Interviewed with the residents informed that these issues happened and has reported to CDQ since 8 months ago. However, no evidence to show that the complaint has been documented and entertained.</p> <p>In addition, interviewed with the local community in Mboukou Village confirmed that no communication/ update on the status and progress of the complaint related to the dead fish in the trenches. A proactive solution shall be taken by the company rather than awaiting for resolution.</p> <p>One of the complainant of sexual harassment in Mboukou informed that she has reported to her superior (Doctor) on the safety issue of one female nurse to work a night shift. Cross-check with HR Manager confirmed that this issue has been raised. No evidence to show that the complaint has been documented and entertained.</p>		
<b>Corrections:</b>	Assign specific contact point for internal and external complaint receipt in the Grievance Procedure. Focal point shall ensure implementation of complaint management flow chart according to specific the timeline.		
<b>Root Cause Analysis:</b>	<ul style="list-style-type: none"> <li>i) Complaint management for external and internal stakeholders are not followed according to the Grievance Procedure.</li> <li>ii) Awareness of stakeholder on complaint process i.e. complaint form/ complaint process is lacking.</li> </ul>		
<b>Corrective Actions:</b>	<ul style="list-style-type: none"> <li>i) Review current grievance procedure to allow manual record of external complaint, to include possibility of appeal by complainant for internal complaint and includes the option of access to independent legal and technical advice, the ability for complainants to choose individuals or groups to support them and/or act as observers, as well as the option of a third-party mediator. Internal stakeholders should include contractor workforce and foreign workforce.</li> </ul>		

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	<p>ii) Communicate revised procedure (flow chat and contact person) to all internal/ external stakeholders (Delegate, Gender Committee, Community Steering Committee) and display at permanent facilities i.e. biometric center, office and mill.</p> <p>iii) Conduct annual review of all closed and open grievance cases by Director of Human Resources and CRS support team. Summary of cases (total complaint received for past one-year, nature of complaint, total closed case, total open cases) for all sites (Awala, Makouke, Mouila and Ndende) will be provided by Director of Human Resources to OPG Vice President, Deputy Site Head and respective CRS managers by end of the year.</p>
<b>Assessment Conclusion:</b>	<p>Correction action plan is accepted. Effectiveness of corrective action taken will be further verified in the next assessment.</p> <p>ASA3 Verification:          Bilala POM demonstrated compliance to the indicator based on corrective action plan submitted. See current evidence under 4.2.3. Hence NC is considered closed.</p>

Non-conformity			
<b>NCR Ref #</b>	1849207-201909-N8	<b>Clause &amp; Category (Major / Minor)</b>	Indicator 4.2.4 Minor
<b>Date Issued</b>	25/11/2019	<b>Due Date</b>	Next ASA
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	01/12/2020
<b>Statement of Nonconformity:</b>	The conflict resolution mechanism includes the option of access to independent legal and technical advice, the ability for complainants to choose individuals or groups to support them and/or act as observers, as well as the option of a third-party mediator was not clearly outline.		
<b>Requirement Reference:</b>	The conflict resolution mechanism includes the option of access to independent legal and technical advice, the ability for complainants to choose individuals or groups to support them and/or act as observers, as well as the option of a third-party mediator.		
<b>Objective Evidence:</b>	Olam fully supports the United Nations Global Compact's (UNGC) Guiding Principles on Business and Human Rights and commits to promote best practice throughout our activities as written in the Human Rights Policy. However, it is not clearly outline in the Human Rights Policy which made reference to the Guiding Principles on Business and Human Rights.		
<b>Corrections:</b>	<p>i) Assign specific contact point for internal and external complaint receipt in the Grievance Procedure. Focal point shall ensure implementation of complaint management flow chart according to specific the timeline.</p> <p>ii) Review current grievance procedure to allow manual record of external complaint and to include possibility of appeal by complainant for internal complaint and option of access to independent legal and technical advice, the ability for complainants to choose individuals or groups to support them and/or act as observers, as well as the option of a third-party mediator.</p>		

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	<ul style="list-style-type: none"> <li>iii) Communicate revised grievance procedure.</li> <li>iv) Conduct annual analysis of internal and external complaint to ensure procedure are implemented accordingly or revise procedure if issues are raised as part of the analysis by end of the year e.g. Socprog issue.</li> </ul>
<b>Root Cause Analysis:</b>	<ul style="list-style-type: none"> <li>i) New requirement is indirectly stated in Human Rights Policy and not clearly spell out in the grievance procedure.</li> <li>ii) Complaint management for external and internal stakeholders are not followed according to the Grievance Procedure.</li> <li>iii) Awareness of stakeholder on complaint process i.e. complaint form/ complaint process is lacking.</li> </ul>
<b>Corrective Actions:</b>	<ul style="list-style-type: none"> <li>i) Review current grievance procedure to allow manual record of external complaint and to include possibility of appeal by complainant for internal complaint. Internal stakeholders should include contractor workforce and foreign workforce.</li> <li>ii) Review current grievance procedure to allow manual record of external complaint and to include possibility of appeal by complainant for internal complaint and option of access to independent legal and technical advice, the ability for complainants to choose individuals or groups to support them and/or act as observers, as well as the option of a third-party mediator.</li> <li>iii) Communicate revised procedure (flow chat and contact person) to all internal/ external stakeholders (Delegate, Gender Committee, Community Steering Committee) and display at permanent facilities i.e. biometric center, office and mill.</li> <li>iv) Conduct annual review of all closed and open grievance cases by Director of Human Resources and CRS support team. Summary of cases (total complaint received for past one-year, nature of complaint, total closed case, total open cases) for all sites (Awala, Makouke, Mouila and Ndende) will be provided by Director of Human Resources to OPG Vice President, Deputy Site Head and respective CRS managers by end of the year.</li> </ul>
<b>Assessment Conclusion:</b>	<p>Correction action plan is accepted. Effectiveness of corrective action taken will be further verified in the next assessment.</p> <p>ASA3 Verification: Bilala POM demonstrated compliance to the indicator based on corrective action plan submitted. See current evidence under 4.2.4. Hence NC is considered closed.</p>

Non-conformity			
<b>NCR Ref #</b>	1849207-201909-N9	<b>Clause &amp; Category (Major / Minor)</b>	Indicator 6.2.7 Minor
<b>Date Issued</b>	25/11/2019	<b>Due Date</b>	Next ASA
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	01/12/2020
<b>Statement of Nonconformity:</b>	Temporary labours are used for all core work in the plantations and mill.		

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<b>Requirement Reference:</b>	Permanent, full-time employment is used for all core work performed by the unit of certification. Casual, temporary and day labour is limited to jobs that are temporary or seasonal.
<b>Objective Evidence:</b>	Document reviewed on the employment contracts of the workers with Contrat A Duree Determinee (CDD) – Fixed Term Employment (Temporary workers as defined by ILO) are performing core work such as harvesting, manuring, spraying and mill operators.
<b>Corrections:</b>	Gabon NI is in-progress and yet to specify relevant context in Gabon and West Africa based on RSPO new P&C 2018.
<b>Root Cause Analysis:</b>	Collaborate with Gabon NI to ensure CDD according Code due Travail is permitted in national context for all activities.
<b>Corrective Actions:</b>	Ensure inputs delivered to Gabon NI Task Force to include interpretation of indicator 6.2.7 and new P&C based on Gabon context.
<b>Assessment Conclusion:</b>	Correction action plan is accepted. Effectiveness of corrective action taken will be further verified in the next assessment  ASA3 Verification: Bilala POM demonstrated compliance to the indicator based on corrective action plan submitted. See current evidence under 6.2.7. Hence NC is considered closed.

Non-conformity			
<b>NCR Ref #</b>	1849207-201909-N10	<b>Clause &amp; Category (Major / Minor)</b>	Indicator 6.3.2 Minor
<b>Date Issued</b>	25/11/2019	<b>Due Date</b>	Next ASA
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	01/12/2020
<b>Statement of Nonconformity:</b>	Minutes of meetings between the unit of certification with trade unions or workers representatives, who are freely elected, are not made available during the time of audit.		
<b>Requirement Reference:</b>	Minutes of meetings between the unit of certification with trade unions or workers representatives, who are freely elected, are documented in national languages and made available upon request.		
<b>Objective Evidence:</b>	There was an ad-hoc meeting conducted on 21/10/2019 and monthly meeting with management on 31/10/2019. However, meeting minutes for these two meetings were not retained by the company and was not available during the audit.		
<b>Corrections:</b>	i) Prepare internal minutes of meeting with Delegate. ii) Communicate and share a copy of minutes of meeting with Delegate in next meeting		
<b>Root Cause Analysis:</b>	Meeting minutes with Delegate are not prepared after each meeting.		
<b>Corrective Actions:</b>	Circulate minutes of meeting with Delegate in next meeting, one agenda is set to review previous minutes.		

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<b>Assessment Conclusion:</b>	<p>Correction action plan is accepted. Effectiveness of corrective action taken will be further verified in the next assessment.</p> <p>ASA3 Verification: Bilala POM demonstrated compliance to the indicator based on corrective action plan submitted. See current evidence under 6.3.2. Hence NC is considered closed.</p>
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Non-conformity			
<b>NCR Ref #</b>	1849207-201909-N11	<b>Clause &amp; Category (Major / Minor)</b>	Indicator 2.1.2 Minor
<b>Date Issued</b>	25/11/2019	<b>Due Date</b>	Next ASA
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	01/12/2020
<b>Statement of Nonconformity:</b>	Monitoring of legal compliances of contractors are not sufficient.		
<b>Requirement Reference:</b>	A documented system for ensuring legal compliance is in place. This system has a means to track changes to the law and also includes listing and evidence of legal due diligence of all contracted third parties, recruitment agencies, service providers and labour contractors.		
<b>Objective Evidence:</b>	During the daily opening meeting on 23/11/2019 for assessment at Lot 1, it was informed that there are trucks transferring workers could not make it to the estate and have to return due to potentially the contractors managing the transfer have not paid Patent Tax. Interview with Olam personnel shows that there is no monitoring if the contractor are meeting the legal requirements of paying the required taxes whereas this particular clause is within the contract. As a consequent of not able to monitor this requirement, workers have missed their work opportunity for the day.		
<b>Corrections:</b>	<ul style="list-style-type: none"> <li>i) Compile all relevant papers during signing of contract in Jan 2020.</li> <li>ii) Ensure full compliance of contractors.</li> </ul>		
<b>Root Cause Analysis:</b>	<ul style="list-style-type: none"> <li>i) Monitoring of contractors' legal compliance are conducted by legal department through independent body (AIC) on annual basis but recent legal audit was conducted during week of 11th November 2019 and report is yet to be finalised.</li> <li>ii) Monthly contractors monitoring does not include paper legal compliance.</li> <li>iii) Complete paper legal compliance is not compiled during signing of contract.</li> </ul>		
<b>Corrective Actions:</b>	<ul style="list-style-type: none"> <li>i) Obtain 2019 legal audit findings and take follow up actions on contractors by Q1 2020.</li> <li>ii) Suspend non complying contractors according to legal audit findings and monthly HR contractors monitoring recommendation.</li> </ul>		
<b>Assessment Conclusion:</b>	Correction action plan is accepted. Effectiveness of corrective action taken will be further verified in the next assessment.		

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	<p>ASA3 Verification: Bilala POM demonstrated compliance to the indicator based on corrective action plan submitted. See current evidence under 2.1.2. Hence NC is considered closed.</p>
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Non-conformity			
<b>NCR Ref #</b>	1849207-201909-N12	<b>Clause &amp; Category (Major / Minor)</b>	Indicator 4.4.6 Minor
<b>Date Issued</b>	25/11/2019	<b>Due Date</b>	Next ASA
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	01/12/2020
<b>Statement of Nonconformity:</b>	Implementation of the agreed FPIC negotiation was not carried sufficiently.		
<b>Requirement Reference:</b>	There is evidence that implementation of agreements negotiated through FPIC is annually reviewed in consultation with affected parties.		
<b>Objective Evidence:</b>	The management plan to execute all outstanding social contract or those amendments to the social contract are not documented with timeframe to complete and agreed with the affected parties. The social contract execution was also highlighted by the Mouila Prefect that it is outdated and poor in execution.		
<b>Corrections:</b>	Update of social contract to include annual program 2020 timeline and deliverables.		
<b>Root Cause Analysis:</b>	Social contract finalised without mention of expected delivery timeline according to budget and availability/ capability of local contractors to complete all infrastructure		
<b>Corrective Actions:</b>	i) Prepare 2020 annual program for social contract implementation. ii) Communicate programme to with impacted villages via Community Steering Committee.		
<b>Assessment Conclusion:</b>	Correction action plan is accepted. Effectiveness of corrective action taken will be further verified in the next assessment.  ASA3 Verification: Bilala POM demonstrated compliance to the indicator based on corrective action plan submitted. See current evidence under 4.4.6. Hence NC is considered closed.		

Non-conformity			
<b>NCR Ref #</b>	1849207-201909-N13	<b>Clause &amp; Category (Major / Minor)</b>	Indicator 4.8.4 Minor
<b>Date Issued</b>	25/11/2019	<b>Due Date</b>	Next ASA
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	01/12/2020

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<b>Statement of Nonconformity:</b>	Mechanism to resolve land conflict and dispute is not sufficiently documented.
<b>Requirement Reference:</b>	For any conflict or dispute over the land, the extent of the disputed area is mapped out in participatory way with involvement of affected parties (including neighbouring communities where applicable)
<b>Objective Evidence:</b>	Despite there was no land dispute identified in this assessment, there was no specific resolution mechanism for land conflict or dispute especially documented mechanism including participatory mapping involving affected parties. The Complaints and complaints management procedure dated January 2019 does not provide sufficient guidance.
<b>Corrections:</b>	Olam Palm Gabon is developed based on full compliance to the RSPO New Planting Procedures which include FPIC and participatory mapping with relevant stakeholders. At the time of audit, there is no land conflict within certification units i.e. Lot 1 and Lot 3 to demonstrate compliance of this requirement. However, OPG also does not have a specific SOP on land conflict resolution in case of any land conflict issue.
<b>Root Cause Analysis:</b>	Develop a specific SOP on land conflicts resolution to include participatory mapping of the disputed area with involvement of affected parties (including neighbouring communities where applicable).
<b>Corrective Actions:</b>	Communicate and share the specific land resolution SOP with the communities.
<b>Assessment Conclusion:</b>	Correction action plan is accepted. Effectiveness of corrective action taken will be further verified in the next assessment.  ASA3 Verification: Bilala POM demonstrated compliance to the indicator based on corrective action plan submitted. See current evidence under 4.8.4. Hence NC is considered closed.

Non-conformity			
<b>NCR Ref #</b>	1849207-201909-N14	<b>Clause &amp; Category (Major / Minor)</b>	Indicator 7.3.1 Minor
<b>Date Issued</b>	25/11/2019	<b>Due Date</b>	Next ASA
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	01/12/2020
<b>Statement of Nonconformity:</b>	This is a repeated NC from previous assessment. Waste management are not sufficiently carried out.		
<b>Requirement Reference:</b>	A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented.		
<b>Objective Evidence:</b>	During field assessment at the waste collection centres / landfills, it was observed that hazardous waste has been stored and not able to be disposed yet as per the management plan. Despite of actions have been started, the management plan shall be revised with specific time commitment as this has already be an issue.		



	It was further observed that in Lot 1 workshop, the secondary containment of the waste oil have not installed valve to contained any spillage of the oil. The current installation is directly discharge to the oil trap which is not be sufficient to contain the volume of the waste oil tank
<b>Corrections:</b>	<ul style="list-style-type: none"> <li>i) Biannual waste reduction, recycling, reusing, and disposal awareness campaign at all G10 housing and at onsite school.</li> <li>ii) Educate residents and kids at school to separate organic vs non organic waste (plastic, paper, glass, tin) in two separate bags at home.</li> <li>iii) Specific attention given to housing residents and circulate do and don't when staying on site. iv) Review waste management strategy according to local context e.g. triple rinse plastic chemical container and shred; install valve for waste oil containments. Revised strategy to be validated by EHS head.</li> </ul>
<b>Root Cause Analysis:</b>	Waste reduction, recycling, reusing, and disposal awareness and system is lacking and generally overall in Gabon context. There is no availability of proper collectors for hazardous waste in Gabon.
<b>Corrective Actions:</b>	<ul style="list-style-type: none"> <li>i) Conduct annual cleaning around G10 housing and / or provide annual award to cleanest G10 housing site.</li> <li>ii) Review waste management strategy.</li> </ul>
<b>Assessment Conclusion:</b>	<p>Correction action plan is accepted. Effectiveness of corrective action taken will be further verified in the next assessment.</p> <p>ASA3 Verification: Bilala POM demonstrated compliance to the indicator based on corrective action plan submitted. See current evidence under 7.3.1. Hence NC is considered closed.</p>

Non-conformity			
<b>NCR Ref #</b>	1849207-201909-N15	<b>Clause &amp; Category (Major / Minor)</b>	Indicator 7.3.2 Minor
<b>Date Issued</b>	25/11/2019	<b>Due Date</b>	Next ASA
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	01/12/2020
<b>Statement of Nonconformity:</b>	Understanding of waste disposal is lacking.		
<b>Requirement Reference:</b>	Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.		
<b>Objective Evidence:</b>	<p>Disposal of waste is still not yet fully understood by workers and managers:</p> <ol style="list-style-type: none"> <li>1. Implementation of waste segregation and awareness of domestic waste disposal/collection at housing camps are still lacking.</li> <li>2. Estate 15 (near to plot V110), it was found to have an abandon waste site.</li> <li>3. Found reuse of chemical container as seat at Mboukou housing area.</li> </ol>		



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<b>Corrections:</b>	<ul style="list-style-type: none"> <li>i) Biannual waste reduction, recycling, reusing, and disposal awareness campaign at all G10 housing and at onsite school.</li> <li>ii) Specific attention given to housing residents and circulate do and don't when staying on site.</li> </ul>
<b>Root Cause Analysis:</b>	Waste reduction, recycling, reusing, and disposal awareness and system is lacking and generally overall in Gabon context.
<b>Corrective Actions:</b>	<ul style="list-style-type: none"> <li>i) Educate residents and kids at school to separate organic vs non organic waste (plastic, paper, glass, tin) in two separate bags at home.</li> <li>ii) Circulate memo to all residents of G10 housing on do and don't e.g. no storage/ use of chemical container at home.</li> <li>iii) Conduct annual cleaning around G10 housing and/ or provide annual award to cleanest G10 housing site.</li> </ul>
<b>Assessment Conclusion:</b>	<p>Correction action plan is accepted. Effectiveness of corrective action taken will be further verified in the next assessment.</p> <p>ASA3 Verification:          Bilala POM demonstrated compliance to the indicator based on corrective action plan submitted. See current evidence under 7.3.2. Hence NC is considered closed.</p>

<b>Opportunity for Improvements</b>	
<b>OFI #</b>	<b>Description</b>
<b>OFI 1</b>	<p><b>1849207-201909-I1</b></p> <p><b><u>Indicator 6.2.6</u></b>  <b>Details:</b>            Acknowledge that the calculation of prevailing wages was only published 1 week before the assessment, hence the remaining in-kind benefit e.g. water supply and the medical expenses provided by the company to the workers to be included.</p> <p>ASA3 Verification:            Prevailing living wage is fully calculated and in place. See current evidence under 6.2.6.</p>
<b>OFI 2</b>	<p><b>1849207-201909-M8 (drop to OFI based on BSI's appeal panel decision dated 17/01/20)</b></p> <p><b><u>Indicator 3.4.3</u></b>  <b>Details:</b>            At the time of the assessment, there were insufficient baseline data which does not allowed Olam to have comprehensive EIA. However, Olam needs to update its management plan to consider the extensive rainy season.</p> <p>ASA3 Verification:            Bilala POM has still not been able to update its SEIA management plan due to covid restriction. See evidence under indicator 3.4.3.</p>

**3.4.2 Summary of the Nonconformities and Status**

CAR Ref.	Category (Critical / Minor)	P&C Indicator	Issued Date	Status & Date (Closure)
1562544-201709-N1	Minor	5.1.3	24/11/2017	Closed, 22/11/2018
1712399-201611-M1	Major	4.7.3	29/11/2018	Closed, 10/02/2019
1712399-201611-M2	Major	6.5.2	29/11/2018	Re-issue under the new indicator of RSPO P&C 2018.
1712399-201611-M3	Major	6.3.2	29/11/2018	Re-issue under the new indicator of RSPO P&C 2018.
1712399-201611-M4	Major	5.6.1	29/11/2018	Closed, 10/02/2019
1712399-201611-M5	Major	5.11.1	29/11/2018	Closed, 10/02/2019
1712399-201611-N1	Minor	4.7.5	29/11/2018	Re-issue under the new indicator of RSPO P&C 2018.
1712399-201611-N2	Minor	5.3.3	29/11/2018	Re-issue under the new indicator of RSPO P&C 2018.
1849207-201909-M1	Major	3.6.1	25/11/2019	Closed, 05/02/2020
1849207-201909-M2	Major	3.6.2	25/11/2019	Closed, 05/02/2020
1849207-201909-M3	Major	1.1.4	25/11/2019	Closed, 05/02/2020
1849207-201909-M4	Major	5.3.2 (SC)	25/11/2019	Closed, 05/02/2020
1849207-201909-M5	Major	4.1.1	25/11/2019	Closed, 05/02/2020
1849207-201909-M6	Major	6.2.2	25/11/2019	Closed, 05/02/2020
1849207-201909-M7	Major	6.5.1	25/11/2019	Closed, 05/02/2020
1849207-201909-M8	Major	3.4.3	25/11/2019	The NC is dropped based on BSI's appeal panel decision on 17/1/20.
1849207-201909-M9	Major	7.12.4	25/11/2019	Closed, 05/02/2020
1849207-201909-N1	Minor	7.8.3	25/11/2019	Closed, 01/12/2020
1849207-201909-N2	Minor	6.7.2	25/11/2019	Closed, 01/12/2020
1849207-201909-N3	Minor	6.7.4	25/11/2019	Closed, 01/12/2020
1849207-201909-N4	Minor	2.2.2	25/11/2019	Closed, 01/12/2020
1849207-201909-N5	Minor	2.2.3	25/11/2019	Closed, 01/12/2020
1849207-201909-N6	Minor	4.2.2	25/11/2019	Closed, 01/12/2020
1849207-201909-N7	Minor	4.2.3	25/11/2019	Closed, 01/12/2020
1849207-201909-N8	Minor	4.2.4	25/11/2019	Closed, 01/12/2020

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1849207-201909-N9	Minor	6.2.7	25/11/2019	Closed, 01/12/2020
1849207-201909-N10	Minor	6.3.2	25/11/2019	Closed, 01/12/2020
1849207-201909-N11	Minor	2.1.2	25/11/2019	Closed, 01/12/2020
1849207-201909-N12	Minor	4.4.6	25/11/2019	Closed, 01/12/2020
1849207-201909-N13	Minor	4.8.4	25/11/2019	Closed, 01/12/2020
1849207-201909-N14	Minor	7.3.1	25/11/2019	Closed, 01/12/2020
1849207-201909-N15	Minor	7.3.2	25/11/2019	Closed, 01/12/2020
2019872-202011M1	Critical	6.7.3	01/12/2020	Closed, 04/02/2021
2019872-202011M2	Critical	6.2.4	01/12/2020	Closed, 04/02/2021
2019872-202011M3	Critical	6.6.1	01/12/2020	Closed, 04/02/2021
2019872-202011M4	Critical	7.2.7	01/12/2020	Closed, 04/02/2021
2019872-202011NI	Minor	6.7.2	01/12/2020	Closed, 04/02/2021

**3.5 Stakeholders and previous land owner / user consultation**

Meetings were conducted with stakeholders to seek their views on the performance of the company with respect to the RSPO requirements and aspects where they considered that improvements could be made. At the start of each meeting, the interviewer explained the purpose of the audit followed by an evaluation of the relationship between the stakeholder and the company before discussions proceeded. The interviewer recorded comments made by stakeholders and later was verified with the management team. Any comment which is not complying to the RSPO P&C requirements have been incorporated as an assessment finding.

Structured worker interviews with male and female workers and staff were held in private at the workplace in the mill and the estates. Fieldworkers were interviewed informally in small groups in the field. In addition, the wives of workers and staff were interviewed in informal group meetings at their housing. Separate visits were made to each of the local communities to meet with the village head and residents. Company officials were not present at any of the internal or external stakeholder interviews. A list of Stakeholders contacted is included as below.

<b>List of Stakeholders contacted</b>	
<p><b>Internal Stakeholders</b>                      OPG Bialala Workers (POM and Estate)                      Gender Committee (Lot1, 2 and 3)                      Workers Representatives (Lot1, 2 and 3)</p>	<p><b>Union/Contractors</b>                      Communities from Bemboudie, Lambarene-Kili, Knana, Diangui, Fanda, Canton Koumou                      Communities from Mounigou, Mbadi, Canton Dola Nord                      Communities from St Martin, Mboukou, Migabé                      Doubou, Moutambe Sane Foumou, Guidouma                      3<sup>rd</sup> Party Contractors (Labour)</p>
<p><b>Government Departments</b>                      Prefet of Ngounie/Mouila</p>	<p><b>NGO</b>                      Muyissi Environnement</p>

**Stakeholders comment**

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<p><b>1</b></p>	<p><b>Feedbacks:</b>  Muyissi Environnement – OPG offer many opportunities in the region. OPG could increase in effort to local population such as give more land for cultivation, more access for fishing, engage people from the village as worker directly and not by contractors. Communication with local NGO and local authority should be increased.</p> <p><b>Management Responses:</b>  Noted, will do the necessary to continue for the improvement.</p> <p><b>Audit Team Findings:</b>  No further issue.</p>
<p><b>2</b></p>	<p><b>Feedbacks:</b>  Prefet of Ngounie/Mouila – OPG has given many benefits to local population. However, social contracts with villages could include others appropriate projects to peoples. OPG could increase in effort to local population such as engage people from the village as worker directly and not by contractors or Indonesian people. Communication with local authority should be increased and pay tax to local office, not at Libreville only. Indeed, the last could also increase the local development.</p> <p><b>Management Responses:</b>  Noted, will do the necessary to continue for the improvement.</p> <p><b>Audit Team Findings:</b>  No further issue.</p>
<p><b>3</b></p>	<p><b>Feedbacks:</b>  Delegates elected in 2015 for a mandate of 3 years, re-elected in 2017. Delegates fully understand their roles (intermediary between workers and company). There exists an annual calendar of meetings, which is communicated with human resources. Delegates hold meetings every Monday. A complaints logbook in which workers concerns are entered and shared with HR. Delegates asserted that they do not have an office to keep their files (Lot 2), such that presently individuals take files and other documents to their homes. Additionally, the term of office of delegates have been extended.</p> <p><b>Management Responses:</b>  OPG is currently refurbishing office space to be put at the disposal of workers’ representatives. Due to COVID-19, meeting has been postponed and will done when the status will be favourable and authorize by the local authority.</p> <p><b>Audit Team Findings:</b>  Noted, will do the necessary to continue for the improvement.</p>
<p><b>4</b></p>	<p><b>Feedbacks:</b>  Gender Committees in Lots 1, 2 and 3 are fully functional. Committee members understand their roles; i.e. to deal with cases of discrimination, harassment, reproductive health rights, etc. There exists a complaints form to register complaints, and committee sits within two days of receipt of a complaint. Committee takes 5 -10 days to investigate cases, and call witnesses. HR is an observer on the gender committee. The gender committee of Lot 2 is still very young, and was installed in 2020. A lot of sensitization still needs to be done.</p> <p><b>Management Responses:</b>  Noted, will do the necessary to continue for the improvement.</p> <p><b>Audit Team Findings:</b>  No further issue.</p>
	<p><b>Feedbacks:</b></p>

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<b>5</b>	<p>OPG has socialized SOP and policies with Sub-contractors. Sub-contractors understand OPG social and environmental policies and are implementing same. However, OPG needs to continue sensitization and follow-up with sub-contractors to ensure that OPG social and environmental policies as prescribed by RSPO P&amp;C are fully incorporated into day-to-day operations of third party contractors.</p>
	<p><b>Management Responses:</b> Noted, will do the necessary to continue for the improvement.</p>
	<p><b>Audit Team Findings:</b> No further issue.</p>

List of land owner / user contacted					
Name	Years of ownership / used	Land area (ha)	Agreement (Yes / No)	Agreement base on FPIC (Yes/No)	Compliance on the agreement terms and conditions
Douya village, Mbadi village, Mouladou fouala village and Koumbanou/Maramba	> 20	9,466 ha	Yes	Yes	Yes

Villager consulted were the previous land users within the concession area of Mouila lot 1, Lot 2 and lot 3. Ownership belong to the Government of Gabon and leased to Olam Palm Gabon (OPG) for 50 years until 2066.

- Reference is made to; RSPO GHG Assessment for New Plantings, Lot 3 Extension, Olam Palm Gabon dated 15/2/17, Summary Report of ESIA and HCV Assessments Olam Palm Gabon, Mouila Lot 3 May 2015.


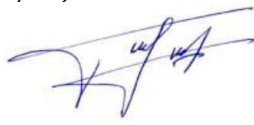
Previous land owner / user comment	
<b>1</b>	<p><b>Feedbacks:</b> Communities from Bemboudie, Lambarene-Kili, Knana, Diangui, Fanda, Canton Koumou, Mounigou, Mbadi, Canton Dola Nord, St Martin, Mboukou, Migabé, Doubou, Moutambe Sane Foumou, Guidouma – They explained that they have been informed on all updated procedure and policies in place by OLAM team. They have given their consent to OPG. OPG employs the people from their village and they have access to cultivation land. Most of them claimed the understanding of the handling of register given to them. Also, they requested about the meeting with Olam representative person concerning the statement and some updated they want to submit on the social contracts signed.</p>
	<p><b>Management Responses:</b> All document mentioned in the register are explained to them. Many times, person who handle the register of the villagers is not around. Thus, they advise the villagers to identify internally various persons in order to keep the register for updating. Due to COVID-19, meeting has been postponed and will done when the status will be favorable and authorize by the local authority.</p>
	<p><b>Audit Team Findings:</b> Refer to Indicator 1.1.4 and 4.4.6</p>

**3.6 Impartiality and conflict of interest**

During this assessment there *was no* circumstances or pressure that had influenced the independence or confidentiality of the assessment team.

**Formal Signing-off of Assessment Conclusion and Recommendation**

The audit objectives have been achieved and the certificate scope remains appropriate. Based on the results of this audit, it is concluded that Olam Palm Gabon Bilala Palm Oil Mill has complied with the RSPO Principles and Criteria, Gabon National Interpretation September 2020 for Sustainable Palm Oil and audit criteria identified within the audit report. It is deemed that the management system continues to achieve its intended outcomes. Therefore, it is recommended that the certification of Olam Palm Gabon Bilala Palm Oil Mill is continued.

Report prepared by	Acceptance of Assessment Conclusion
<b>Name:</b> <b>Frank Kwesi</b>	<b>Name:</b> <b>Mahamadou DAO</b>
<b>Company Name:</b> <b>BSI Services Malaysia Sdn Bhd</b>	<b>Company Name:</b> <b>Olam Palm Gabon (Olam International Ltd)</b>
<b>Title:</b> <b>Lead Auditor</b>	<b>Title:</b> <b>Responsible of Compliance &amp; Certification</b>
<b>Signature:</b> 	<b>Signature:</b> <i>(I the undersigned, being the most senior relevant management representative of the operation seeking or holding certification, agree with the contents of this report and accept the liability in execution of the procedure in the report.)</i> 
<b>Date: 15.02.2021</b>	<b>Date: 18.02.2021</b>

**Appendix A: Summary of Findings**

Criterion / Indicator	Assessment Findings	Compliance	
<b>Principle 1: Behave ethically and transparently</b>			
<b>Criterion 1.1:</b> The unit of certification provides adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.			
1.1.1	<p><b>(C)</b> Management documents that are specified in the RSPO P&amp;C are made publicly available.</p> <p>- Critical (Major) compliance -</p>	<p>Stakeholders Communication Guideline with Doc. No.: GUI NO 01/CRS/MOUILA/0919, Rev. 0 dated 01 September 2019</p> <p>Procedure of request management named "Procédure de gestion des demandes d'informations" ref SOPN°005/CRS DI (4)/0120 Revision 04 of 17<sup>th</sup> January 2020.</p> <p>List of public documents is indicated in the procedure. There are:</p> <ul style="list-style-type: none"> <li>• Landuse right</li> <li>• Health and Safety plan</li> <li>• Environmental and Social Impact Assessment (ESIA)</li> <li>• Environmental and Social Management Plan (ESMP)</li> <li>• HCV and HCS (if relevant) document</li> <li>• Pollution prevention and reduction plan</li> <li>• Grievance policy and record</li> <li>• Negotiation document</li> <li>• Human rights policy</li> <li>• Continuous improvement plan</li> <li>• Public summary of certification report</li> </ul>	Complied
1.1.2	Information is provided in appropriate languages and accessible to relevant stakeholders.	<p>Lot 2 and 3:</p> <p>The National language of Gabon is French. All information was provided in this language such as procedure, records, policies.</p>	Complied

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Criterion / Indicator		Assessment Findings	Compliance
	- Minor compliance -	Interview with some stakeholders during the audit stakeholder meetings i.e. community reps, chiefs and elders of communities etc, all established that most communities' members are fluent in the French language. During the event that when it is necessary, information was communicated in a local language.	
1.1.3	<b>(C)</b> Records of requests for information and responses are maintained. - Critical (Major) compliance -	<p>Procedure of request management named "Procédure de gestion des demandes d'informations" ref SOPN°005/CRS DI(4)/0120 Revision 04 of 17<sup>th</sup> January 2020.</p> <p>At the audit date, no request for information were received according to the procedure. From 18<sup>th</sup> September to 06<sup>th</sup> October 2020, explanation meeting of this procedure has been done. For example: 7 location was concerned in Lot 2 such as:</p> <ul style="list-style-type: none"> <li>• Fanguindaka</li> <li>• Lambaréné-kili</li> <li>• Bemdoubié</li> <li>• Bougounga</li> <li>• Kanana</li> <li>• Diangui</li> <li>• Mandji</li> </ul>	Complied
1.1.4	<b>(C)</b> Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by a nominated management official. - Critical (Major) compliance -	<p>Consultation and communication procedure was made available ref MLA 2-PRO-001-CSR of June 2014.</p> <p>This procedure has been developed by participatory way during meeting with stakeholders from 06<sup>th</sup> to 08<sup>th</sup> May 2014.</p> <p>Register for all information and request was given to villagers. Each village has his own register. For example: Register of Fanguindaka</p>	OFI



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Criterion / Indicator		Assessment Findings				Compliance												
		<p>shows meeting on 12<sup>th</sup> November 2020 and on 20<sup>th</sup> November 2020.</p> <p>OPG social team has a phone number of all representative person per village. They keep communication with them by phone call when it is appropriate.</p> <p>Mrs MOAVELE Atabi is the nominated person in charge of social activities and relation with communities. Copie of her employment contract confirm this assessment. It is dated on 11<sup>th</sup> October 2012.</p> <p>Various meeting has been done with villagers at lot 3.</p> <p>Mrs BEZONA Olivia Laura is the nominated person in charge of social activities and relation with communities. Copy of her assignment letter confirm this assessment. It is dated on 10<sup>th</sup> December 2012.</p> <table border="1"> <thead> <tr> <th>Village</th> <th>Date</th> <th>Content</th> <th>N° of participant</th> </tr> </thead> <tbody> <tr> <td>Mbadi</td> <td>03/07/20</td> <td> <ul style="list-style-type: none"> <li>- Discussion of workers from the village about their transportation</li> <li>- Overtime discussion</li> <li>- Village light reparation</li> </ul> </td> <td>12</td> </tr> <tr> <td>Mounigou, Mbadi, Nanga, Irougou, Ferra, Moulandou Foula, Moutasou, Koumbanou,</td> <td>20 – 28 March 2020</td> <td>- Coronavirus and protective measures</td> <td></td> </tr> </tbody> </table>				Village	Date	Content	N° of participant	Mbadi	03/07/20	<ul style="list-style-type: none"> <li>- Discussion of workers from the village about their transportation</li> <li>- Overtime discussion</li> <li>- Village light reparation</li> </ul>	12	Mounigou, Mbadi, Nanga, Irougou, Ferra, Moulandou Foula, Moutasou, Koumbanou,	20 – 28 March 2020	- Coronavirus and protective measures		
Village	Date	Content	N° of participant															
Mbadi	03/07/20	<ul style="list-style-type: none"> <li>- Discussion of workers from the village about their transportation</li> <li>- Overtime discussion</li> <li>- Village light reparation</li> </ul>	12															
Mounigou, Mbadi, Nanga, Irougou, Ferra, Moulandou Foula, Moutasou, Koumbanou,	20 – 28 March 2020	- Coronavirus and protective measures																

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Criterion / Indicator		Assessment Findings				Compliance
		Ikolo, Okoumbou/Ma kanda, Douya				
		Mbadi, Iroungou, Sanga, Nanga, Ferra, Mounigou	22 – 26 June 2020	- Savannah fire and Traps installation	32	
		Mounigou, Mbadi, Nanga, Iroungou, Ferra, Mouladou Foula, Moutasou, Koumbanou, Ikolo, Okoumbou/Ma kanda, Douya	21 – 31 January 2020 and 03- 04 February 2020	- Explanation on policies and updated procedures	Resident of villages	
		All subcontractors	18 <sup>th</sup> January 2020	- Explanation on policies and updated procedures	23	
		All subcontractors	29 <sup>th</sup> September 2020	- Explanation of RSPO requirements	29	
		<p>At Lot 1, Stakeholders Communication Guideline with Doc. No.: GUI NO 01/CRS/MOUILA/0919, Rev. 0 dated 01 September 2019</p> <p>Various meeting has been done with villagers at lot 1.</p>				

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Criterion / Indicator		Assessment Findings				Compliance								
		<p>Mr MOUKANIMAMBOU Bipakila is the nominated person in charge of social activities and relation with communities. Copy of her assignment letter confirm this assessment. It is dated on 10<sup>th</sup> December 2012.</p> <table border="1"> <thead> <tr> <th>Village</th> <th>Date</th> <th>Content</th> <th>N° of participant</th> </tr> </thead> <tbody> <tr> <td>Guidouma Rembo Mboukou Doubou Moutambe Sane Foumou Guiamba</td> <td>21<sup>st</sup> to 27<sup>th</sup> January 2020</td> <td>Explanation on policies and updated procedures</td> <td>Resident of villages</td> </tr> </tbody> </table> <p>Procedure mentions that register for request and information should be given to all villages. Interview with the villages established that the register has been communicated to them, but register was yet to be given to them. This was confirmed by Migabe and Sanit-Martin village.</p> <p>This is however raised as OFI to keep documented evidence of communication.</p>				Village	Date	Content	N° of participant	Guidouma Rembo Mboukou Doubou Moutambe Sane Foumou Guiamba	21 <sup>st</sup> to 27 <sup>th</sup> January 2020	Explanation on policies and updated procedures	Resident of villages	
Village	Date	Content	N° of participant											
Guidouma Rembo Mboukou Doubou Moutambe Sane Foumou Guiamba	21 <sup>st</sup> to 27 <sup>th</sup> January 2020	Explanation on policies and updated procedures	Resident of villages											
1.1.5	<p>There is a current list of contact and details of stakeholders and their nominated representatives.</p> <p>- Minor compliance -</p>	<p>List of stakeholders has been reviewed in his updated version from October 2020 at lot 2 including:</p> <ul style="list-style-type: none"> <li>• Name of nominated representative;</li> <li>• Position;</li> <li>• Location;</li> <li>• Phone number for those have it</li> </ul>				Complied								

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Criterion / Indicator		Assessment Findings	Compliance
		<p>Stakeholders identified were:</p> <ul style="list-style-type: none"> <li>• Administrative local authorities</li> <li>• Canton chiefs</li> <li>• Villages chiefs</li> <li>• Quarter chiefs</li> <li>• Chef de regroupement</li> <li>• Member of the committee of surveillance</li> <li>• President of village NGO</li> </ul> <p>List of stakeholders from Lot 3 has been updated on November 2020 and list of stakeholders from Lot 3 has been updated on November 2020.</p>	
<b>Criterion 1.2:</b> The unit of certification commits to ethical conduct in all business operations and transactions.			
1.2.1	<p>A policy for ethical conduct is in place and implemented in all business operations and transactions, including recruitment and contracts.</p> <p>- Minor compliance -</p>	<p>Written policies committing to a code of ethical conduct and integrity in all operations and transactions has been reviewed as stated on document named "The Olam Code of Conduct" dated February 2016.</p> <p>"Olam Supplier Code" dated April 2018 and "Olam Anti-Bribery and Corruption Policy" established the commitment of the company on:</p> <ul style="list-style-type: none"> <li>• Promoting transparency and complying with all applicable laws and legislation</li> <li>• Ensuring that all our actions are conducted with integrity and transparency in accordance with our values</li> <li>• Preventing corruption, bribery and fraudulent use of funds and resources</li> </ul>	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		<ul style="list-style-type: none"> <li>Avoiding situations involving actual or potential conflict of interest so that even the slightest doubt about integrity is not raised.</li> </ul> <p>Workers interviewed confirmed that they received communication on the policies. For example: training done at Lot 1 on 18<sup>th</sup> January 2020 with 23 participants and 30<sup>th</sup> January 2020 with 11 participants. Also, interviews with the contractor confirmed that he is aware of the policies.</p>	
1.2.2	<p>A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice.</p> <p>- Minor compliance -</p>	<p>A system to monitor compliance and the implementation of the policy and overall ethical business practice is in place and done by the Legal Department in Libreville and Mouila.</p> <p>Activity carried out are:</p> <ul style="list-style-type: none"> <li>provide to all third parties a copy of the policy,</li> <li>organized awareness activity to keep stakeholders informed and</li> <li>legal audit to verify the compliance of the last on the policy and overall ethical business practice.</li> </ul> <p>Training for "Olam Anti-Bribery and Corruption Policy" was conducted to all the employees. Seen the completed list for the employees that have participated to the training dated 17/11/2020.</p> <p>Legal audit was conducted in 2020 by the third party. The topics covered were such as:</p> <ul style="list-style-type: none"> <li>Formalization and content of service providers contracts</li> <li>Administrative control of employment, formalization and</li> <li>termination of employment contracts</li> <li>Tax</li> <li>Social Security</li> <li>Security relating to the transportation of personnel and goods</li> </ul>	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		<ul style="list-style-type: none"> <li>Environmental Impact Assessment</li> </ul> Draft of the audit report and the checklist were reviewed during the audit.	
<b>Principle 2: Operate legally and respect rights</b>			
<b>Criterion 2.1:</b> There is compliance with all applicable local, national and ratified international laws and regulations.			
2.1.1	<b>(C)</b> The unit of certification complies with the applicable legal and regulatory requirements. - Critical (Major) compliance -	The unit of certification keeps a list of legal and regulatory requirements (including but not limited to Labour Code, Social Security Code, Internal Regulations, Human Resources Manual, etc.).  Additionally, the unit of certification has conducted a legal due diligence (audit) aimed at ensuring its compliance with legal requirements.	Complied
2.1.2	A documented system for ensuring legal compliance is in place. This system has a means to track changes to the laws and regulations in force, including listing and evidence of legal due diligence of all contracted third parties, recruitment agencies, service providers and labour contractors. - Minor compliance -	Olam Palm Gabon - Mouila conducted a legal due diligence (Procedure Interne au Departement Juridique: Veille Juridique et Mise en Conformite) on 28/04/2014 and updated on 28/04/2016. The legal due diligence was further reviewed in 2020, and puts a system of ensuring legal compliance in place. According to the legal due diligence, legal audits are conducted twice a year to ensure legal compliance.  Since then Olam Palm Gabon - Mouila Lot 1,2 and 3 have each conducted a series of due diligences covering Labour, Social Security, Transport, Tax laws, etc. including but not limited to: <ul style="list-style-type: none"> <li>Formalization and content of service providers contracts Lot 1</li> <li>Administrative control of employment, formalization and termination of employment contracts (Labour Lot 3)</li> </ul>	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		<ul style="list-style-type: none"> <li>Security relating to the transportation of personnel and goods (lot 2) and Social Security (Lot1)</li> </ul>	
2.1.3	<p>Legal or authorised boundaries are clearly demarcated and visibly maintained, and there is no planting beyond these legal or authorised boundaries.</p> <p>- Minor compliance -</p>	OPG has clearly demarcated its legal and authorised boundaries by using boundary stones placed at different points along the boundary. The boundary stones are painted red and white for visibility. Additionally, OPG has constructed trenches to physically demarcate their legally authorised boundaries.	Complied
<b>Criterion 2.2:</b> All contractors providing operational services and supplying labour, and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements.			
2.2.1	<p>A list of contracted parties is maintained.</p> <p>- Minor compliance -</p>	The unit of certification maintains a list of contracted parties including but not limited to labour for agricultural activities (slashing, pruning, harvesting), transport of workers, and transport of FFBs.	Complied
2.2.2	<p>All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal requirements, and this can be demonstrated by the third party.</p> <p>- Minor compliance -</p>	<p>All contracts signed between the unit of certification and third parties contain specific clauses on meeting applicable legal requirements (including environmental, social, labour and fiscal). Additionally, the unit of certification holds meetings with third parties to explain Olam's policies.</p> <p>Interviews with third parties proved that they have a full understanding of the content of the contracts signed and the implication of the legal requirements that they have agreed to respect in the contracts, especially social insurance (CNSS), and health insurance (CNAMGS) payments.</p>	Complied
2.2.3	<p>All contracts, including those for FFB supply, contain clauses disallowing child, forced and trafficked labour. Where young workers are employed, the contracts include a clause for their protection.</p> <p>- Minor compliance -</p>	All contracts signed by the unit of certification contain clauses that make reference to the respect of labour laws. Contracts sampled during the audit revealed that they contained clauses that prohibit child labour, forced and trafficked labour. For instance:	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		<ul style="list-style-type: none"> <li>Contract No. OPGM/MIR/11/20/020 Lot 3 on Transport of Personnel, in Article 11 specifically prohibits child, forced and trafficked labour.</li> <li>Contract No. OPGM/MIR/11/2020/L050, on the provision of agricultural services, in Article 11 specifically prohibits child, forced and trafficked labour.</li> </ul>	
<b>Criterion 2.3:</b> All FFB supplies from outside the unit of certification are from legal sources.			
2.3.1	<p><b>(C)</b> For all directly sourced FFB, the mill requires:</p> <ul style="list-style-type: none"> <li>Information on geo-location of FFB origins</li> <li>Proof of the ownership status or the right/claim to the land by the grower/smallholder</li> <li>Where applicable, valid commercial license, or is part of a cooperative which allows the buying and selling of FFB.</li> </ul> <p><b>PROCEDURAL NOTE:</b>            The proof of the status or the right of ownership can be considered at first by the departmental exploitation contract. See decree N° 01497 of December 29, 2011, or the document of the ANUTTC.            - Critical (Major) compliance -</p>	All FFBs are supplied from Olam-owned plantations.	Complied
2.3.2	<p>For all indirectly sourced FFB, the unit of certification obtains from the collection centres, agents or other intermediaries, the evidence as listed in Indicator 2.3.1. PROCEDURAL NOTE: For Implementation Procedure for 2.3.2 refer to Annex 4.            - Minor compliance -</p>	All FFB is from Olam-owned plantations.	Complied
<b>Principle 3: Optimise productivity, efficiency, positive impacts and resilience</b>			
<b>Criterion 3.1:</b> There is an implemented management plan that aims to achieve long-term economic and financial viability.			



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Criterion / Indicator		Assessment Findings	Compliance
3.1.1	<p><b>(C)</b> A business or management plan (minimum three years) is documented that includes, where applicable, a jointly developed business case for Scheme Smallholders.</p> <p>- Critical (Major) compliance -</p>	<p>Olam Palm Gabon Mouila Plantation (Mouila Bilala Palm Oil Mill and supply bases) has established and implemented its commitment to long term sustainability and improvements through a capital expenditure programme. A Budget and 7 years management plan (projections 2017- 2024) was verified during the audit. Mouila Bilala Palm Oil Mill and supply base has made progress towards achieving their performance production targets for the current financial year.</p> <p>OPG has gazetted long range business plan (OPEX and CAPEX: FY2019 - FY2041) for all Concessions including Mouila Plantation. The projection covers FFB forecast, extraction rate (OER &amp; KER), direct cost (upkeep, fertilizer, R&amp;D, mechanization, upkeep tools, harvesting, mill processing and overhead - manager &amp; staff emolument) and in-direct cost (corporate allocation). CAPEX allocation for 2020 has included budget on safety and health, social and welfare as well as for operation.</p>	Complied
3.1.2	<p>An annual replanting programme projected for a minimum of five years with yearly review, is available.</p> <p>- Minor compliance -</p>	<p>There are no plans for replanting until the next 20-25 years as the last planting has been carried out in 2016.</p>	Complied
3.1.3	<p>The unit of certification holds management reviews at planned intervals appropriate to the scale and nature of the activities undertaken.</p> <p>- Minor compliance -</p>	<p>OPG Mouila Plantation holds management review on annual basis. Subsequently, 2020 management review was held on 12/11/2020. Evidence of meeting minute titled MANAGEMENT REVIEW MEETING_RSPO P&amp;C MOUILA LO1 1-2-3 with 28 management reps present and signing the attendance register was sighted.</p>	Complied
<p><b>Criterion 3.2:</b> The unit of Certification regularly monitors and reviews their economic, social and environmental performance and develops and implements action plans that allow demonstrable Continuous improvement in key operations.</p>			

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Criterion / Indicator		Assessment Findings	Compliance
3.2.1	<p><b>(C)</b> The action plan for continuous improvement is implemented, based on consideration of the main social and environmental impacts and opportunities of the unit of certification.</p> <p>- Critical (Major) compliance -</p>	<p>OPG has in place a continuous improvement plan signed and approved by the President, Global Head of Plantation dated 01/01/2016. The plan as sighted addresses the requirement 1-7. The plan define a time bound plan consisting of detailed scheme, program or method for achieving objectives and desired outcomes. The plan have clear targets with timelines for delivery and actions to be taken and a process for monitoring progress, adapting plans to changing circumstances and reporting. The plan also include the identification of named individuals or position responsible for the delivery of the plan. The plan ensure that there is evidence of sufficient resources available to carry out the plan to it fullness. The plan is reviewed every 5 years based on experience in implementation. However, with annual reviews where necessary. Subsequently there has been a review dated 08/04/209. The revision took into consideration 1. Reduction in use of pesticide, 2. Minimization of Environmental Impacts, 3. Yield Optimization for supply base, 4. Training, 5. Plan to reduce pollution and emissions, including GHG are developed, implemented and monitored, 6, Minimization of Environmental Impacts (Social).</p>	Complied
3.2.2	<p>As part of the monitoring and continuous improvement process, annual reports are submitted to the RSPO Secretariat using the RSPO metrics template.</p> <p>- Minor Compliance -</p>	<p>Not applicable as RSPO is yet to announce the template for reporting.</p>	Not Applicable
<p><b>Criterion 3.3:</b> Operating procedures are Appropriately documented, consistently implemented and monitored.</p>			
3.3.1	<p><b>(C)</b> Standard Operating Procedures (SOPs) for the unit of certification are in place.</p> <p>- Critical (Major) compliance -</p>	<p>OPG has developed SOPs for its Plantation activities captioned Olam Palm Gabon Agricultural Policy Manual Volume 1 and 2. The document which has been signed by the Global Head of Plantation dated April 2013 was sighted. The SOP cover 20 operational areas</p>	Complied

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		<p>including ; Nursery Technique and Best Practice, New Oil Plantings (land clearing &amp; Preparation), Estate road and drainage construction requirement, Water management and water drainage system, Planting technique, density and pattern, Soil and water conservation methods, Fertilizer program for nursery, immature and mature plantings, Legume cover crops establishment and management, Immature maintenance and ablation, supplying/replacement and in-fillings, Field Husbandry in mature planting, Harvesting and FFB evacuation, Pruning and Frond management practices, Palm census and pam stand management practice, Integrated pests and disease management practices, Fertilizer sampling for quality control analysis, Field quality audits, Best agricultural management practices, Leaf and soil sampling procedures and Innovation mechanization practices. In addition to the Agric SOPs, there is SOPs for Spraying – version1:2016, Oil Palm Fruit Grading – version1:2016, Oil Palm Replanting – version1:2016, Harvesting Oil Palm - version1:2016 and Manuring version1:2016</p> <p>Similarly there is SOP for Mill in place captioned Olam SOP for Palm Oil Mill version 1 dated 24<sup>th</sup> April 2015. The SOP covers; 1. Reception, 2. Fruit handling station. 3. Sterilization, 4. Threshing station, 5. Pressing Station, 6. Clarification Station, 7. Depericarping Station, 8. Kernel Recovery Station, 9. Boiler station, 10. Power generation Station, 11. Laboratory, 12. Water Treatment plant, 14. ETP Operation (including POME) and Workshop &amp; maintenance.</p>	
3.3.2	<p>A mechanism to check consistent implementation of procedures is in place.</p> <p>- Minor Compliance -</p>	<p>To ensure consistent implementation of the procedures, OPG has in place Field Quality Audit as captured in chapter 17 of the Agric Manual. OPG conduct various field quality audit (Agronomy Report) to help the estate management to check and monitor the quality</p>	Complied

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		<p>and progress of the various field work in accordance with the SOPs. The field quality audit is done on monthly basis to check consistent implementation regarding nursery, husbandry, field planting, fertiliser, harvesting, FFB evacuation etc.</p> <p>For mill SOPs daily monitoring is done using a monitoring checklist. For instance Boiler, thresher, digester, fan, screw conveyor, nut kernel plant line1, nut kernel plant line2, dry kernel plant, press station, monitoring checklists sheet were all sighted. Monitoring is reported on weekly and monthly basis.</p>	
3.3.3	<p>Records of monitoring and any actions taken are maintained and available.</p> <p>- Minor Compliance -</p>	<p>As mentioned above, OPG keep records of all field Quality Audit to monitors implementation and consistency of its SOPs. Monthly Agronomy Report for Lot1, Lot2 and Lot3 for December 2019, February 2020, June 2020 and October were all sighted.</p> <p>Similarly Monthly report for Mill SOPs were sighted for months Jan – June 2020</p>	Complied
<p><b>Criterion 3.4:</b> A comprehensive Social and Environmental Impact Assessment (SEIA) is undertaken prior to new plantings or operations, and a social and environmental management and monitoring plan is implemented and regularly updated in ongoing operations.</p>			
3.4.1	<p><b>(C)</b> In new plantings or operations including mills, an independent SEIA, undertaken through a participatory methodology involving the affected stakeholders, and including the impacts of any smallholder/ outgrower scheme is documented</p> <p>- Critical (Major) compliance -</p>	<p>OPG has conducted an independent SEIA regarding its operations in Lot2 new planting captioned Etude D'Impact Environnemental, Implantation D'une Palmeraie Dans La Zone De Mouila (LOT2) – Olam Palm Gabon. Rapport Final Incluant Les Recommendations De La DGEPN – Avril 2014 (<i>Environmental Impact Study, Establishment of Palm Grove in the Mouila Zone (LOT 2) – Olam Palm Gabon – Final Report including Recommendations from DGEPN – April 2014</i>). The assessment was conducted by Ecosphere with final report submitted on April 2014. The report as sighted.</p>	Complied

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	For Lot 1 and 3 SEIA has not changed since initial certification.	
3.4.2	<p>For the unit of certification, a SEIA is available and social and environmental management and monitoring plans have been developed with participation of affected stakeholders.</p> <p>- Minor Compliance -</p> <p>Based on the SEIA report, a management and monitoring plan has been developed captioned Plan De Gestion Environmental Et Sociale Incluant Les Recommendations De La DGEPN – Avril 2014 (<i>Environmental and Social Management Plan including the recommendations of the DGEPN – April 2014</i>). Review of the documents saw evidence of participation of affected stakeholders in the development of the management and monitoring plan captioned Proces Verbal De La Consultation Publique (<i>Minute of the Public Consultation</i>) conducted on July 26, 2014. In all 7 stakeholders including affected communities were involved in the process regarding Lot2 operations.</p> <p>Lot3 main and extension:            Management and monitoring plan developed captioned Plan De Gestion Environnementale Et Sociale, Implantation D'une Palmeaire Dans La Zones De Mouila (Lot3) (<i>Environmental and Social Management Plan, Establishment of a Palm Grove in the Mouila Areas (Lot3)</i>) dated May 2015.</p> <p>For Lot3 Extention: Projet d'extention de la palmraie dite Olam Palm Mouila lot3, Plan De Gestion Enviornmentale et sociale (PGES) (<i>Extension project of the palm grove known as Olam Palm Mouila lot3, Environmental and Social Management Plan - PGES</i>) dated February 2017, done by TERREA.</p> <p>Lot1: Management and monitoring plan developed captioned Plan De Gestion Environnementale Et Sociale, Implantation D'une Palmeaire Dans La Zones De Mouila (Lot1) (<i>Environmental and Social Management Plan, Establishment of a Palm Grove in the Mouila Areas (Lot1)</i>) dated 2012.</p>	Complied

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		OPG continue to implement the recommendations in the management and monitoring plan and submit annual report to the Department of Environment accordance to the Gabon Code of Environmental No16/93 dated 26/08/1993. Subsequently, OPG has submitted in 2019 report in December which was sighted.	
3.4.3	<p><b>(C)</b> The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way.</p> <p>- Critical (Major) compliance -</p>	<p>OPG is yet to review the management and monitoring plans with the affected stakeholders sighting covid restrictions as the reason the review has not been done. According to OPG there is a Government ban on all public gathering <a href="https://www.garda.com/crisis24/news-alerts/324036/gabon-authorities-limit-gatherings-and-non-essential-services-march-16-update-3">https://www.garda.com/crisis24/news-alerts/324036/gabon-authorities-limit-gatherings-and-non-essential-services-march-16-update-3</a>, hence has not been able to conduct the review. A formal communication (written letter) dated 22.09.2020 to the Governor of the Province – Ngounie Mouila, seeking approval of when the company can organise it steering committee meeting with all affected stakeholders of Lot1, 2 and 3 to review its SEIA management and monitoring plans was sighted. Response is however yet to be received from the Provincial Governor.</p> <p>Subsequently, OPG has informed relevant stakeholder of its intension to review the SEIA management plan with them ones there is go ahead from the Governor. Letters of communication distributed on 19.11.2020 &amp; 23.11.2020 to stakeholders were sighted. Interview with stakeholders (communities) during the audit stakeholder meeting confirmed the communication. This is however raised as observation to be followed up during the next audit.</p>	OFI
<p><b>Criterion 3.5:</b> A system for managing human resources is in place.</p>			

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3.5.1	<p>Employment procedures for recruitment, selection, hiring, promotion, retirement and termination are documented and made available to the workers and their representatives.</p> <p>- Minor Compliance -</p>	<p>OPG has in place in recruitment procedures captioned <i>Procedure De Recrutement</i>. The document which is referenced 2708/2016RH/JB and dated 27/08/2016 version 1 was sighted. The document outline OPG recruitment process including, announcing of vacant position, receiving of application, invitation and interview process, aptitude test and medical surveillance and offer/appointment letter. Before the worker start work, there is an induction to explain all the company's policies. For all recruitment, priority is given to the neighbouring communities. In the event that the expertise is not available, the position is extend externally.</p> <p>There is a CBA in place which captures promotion, retirement and termination procedure based on the labour law of Gabon (Labour Code, Law# 3/94 of 21 November 1994 on the labour code revised by the law No. 025/2018 of February 08, 2019). Furthermore, OPG's Internal Rule which is made available on public notice boards in the company also captures retirement, termination and promotion procedure.</p> <p>To make these document available to workers, the HR manager explained that for all new recruits, the documents are made available during the induction process. Also the document are made available to workers representatives through sensitization meetings. Interview with worker representatives during the stakeholder meeting with them established compliance.</p>	Complied
3.5.2	<p>Employment procedures are implemented, and records are maintained.</p> <p>- Minor Compliance -</p>	<p>OPG implement its employment procedures as sighted. The HR department is responsible for implementing and maintaining all records. Review of personal files saw evidence of the following;                      Lot2</p>	Complied

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	<p>1. Jean Dominique M. Macambo – CNSS: 001-1053377-5 recruited on 12/08/2020,</p> <p>2. M Bounda Mouckagni Christ Farel – recruited on 02/11/2020,</p> <p>3. Mokambo Bruno – CNSS: 001-0413449-9 recruited on 14/10/2020,</p> <p>4. Moueni Mboumba Bhychankga Love Ornela – CNSS: 004-1320915-5 recruited on 10/11/2017</p> <p>5. Maroundou Guimbeti Simone – CNSS: 001-1139292-4 recruited on 21/10/2014</p> <p>Lot3:</p> <p>1. Dismissal letter for Mounanga Fieur Gael, Matidji Odette and Mbombe Youbi Ernan’ss</p> <p>2. Retirement letter for Koumba Kombila Marie, Ebanda Germaine and Malandou Emilnne.</p> <p>3. Recruitment letters for Mouloyi Binono with CNSS# 040-1437153-3 and Bounda Mouckagni with CNSS# 040-1435442-2</p> <p>Lot1:</p> <p>1. Recruitment for Makaya Lionel, Alilangori Okiri Drexter with Alban CNSS# 004-131514-4 and Tomba Mbadinga CNSS# 004-1147839-9</p> <p>2. Dismissal for Jean Pierre with Staff# 000715 and Marie Viviane with staff# 003998</p> <p>3. Retirement for Bouloubou Ndoma with staff# 009950 and Buck Bu Mabick with staff# 016171.</p>	
<p><b>Criterion 3.6:</b> An occupational health and safety (H&amp;S) plan is documented, effectively communicated and implemented.</p>		
<p><b>Guidance:</b></p>		



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Refer to National Law/Regulation or ILO Convention 155 for those countries without national		Occupational Safety and Health Law/Regulation at a minimum.	
3.6.1	<p><b>(C)</b> All operations are risk assessed to identify H&amp;S issues. Mitigation plans and procedures are documented and implemented.</p> <p>- Critical (Major) compliance -</p>	<p>To ensure risk assessment is done OPG has developed SOP for Risk Assessment captioned Safety Code of Practice, referenced S-101.1 dated 01/04/2016. The document details the steps to be taken to ensure workplace risk as it applies to occupational health and safety is identified and appropriate actions taken to mitigate the risk to an acceptable level. Subsequently, OPG has conducted risk assessment for its operations in Lot1, Lot2 and Lot3 captioned Registre De L'analyse Des Risques sur La Sante Et La Securite Au Travail. (<i>Health Risk Analysis Register and Safety at Work</i>). The document which has been prepared by the EHS manager dated 30/01/2020, reviewed by the EHS Director dated 30/01/2020 and approved by the Director General, OPG dated 30/01/2020 was sighted. The document analyses all operations and grade the related risks as Low, Medium, High and Extreme with their mitigation measures. The risk assessment covers plantation and POM activities.</p> <p>As part of risk assessment, activities at the loading ram have been identified as Extreme Risk with appropriate PPEs to be used. Visit to the loading ram in Lot3 found the workers with no Anti-Fall and Safety Harness as identified as PPEs to be used.</p>	Non-compliance
3.6.2	<p><b>(C)</b> The effectiveness of the H&amp;S plan to address health and safety risks to people is monitored.</p> <p>- Critical (Major) compliance -</p>	<p>To ensure effective implementation and monitoring of the H&amp;S plan, OPG conducts field inspection and identification on a daily basis. In the case of PPE use, monitoring is done by the HSE team using a checklist. The checklist as reviewed captures, 1. Date of monitoring, 2. Place of work and activity done, 3. Division and block, 4. PPEs that need to be in place and used by the workers, 5. Remarks based on the field inspection and 6. Recommendation from the field visit. Sample of field monitoring records reviewed include;</p>	Complied

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		<p>Lot2 Div 03, block E.48 – 23/01/2020 – Harvesting activity, Div 01, block D.50 – 16/06/2020 – Spraying activity, Div 03, block I.12 – 21/02/2020 – Fertilizer application. Lot3 estate 14 Div 04 block X102 – 28/10/2020 – spraying, Lot3 estate 14 Div 01 block T.86 spraying – 02/11/2020, Lot3 Div 01 spraying – 29/07/2020 and Lot3 estate 13 Div 02 block X94 – spraying – 13/07/2020 and Lot1 estate 6 block L24 – slashing-12/10/2020, estate 6 block L30 – spraying – 29/09/2020 and estate 6 block I32 – Harvesting – 12/05/2020.</p> <p>Similarly, in the event of accident, the HSE team conduct investigation to ensure that all accident are monitored. Sample of accident investigation conducted on 27/07/2020 (harvesting), 03/08/2020 (driving) and 22/02/2020 (spraying) with their declaration to CNSS were sighted.</p>	
<b>Criterion 3.7:</b> All staff, workers, Scheme Smallholders, out-growers, and contract workers are appropriately trained.			
3.7.1	<p><b>(C)</b> A documented programme that provides training is in place, which is accessible to all staff, workers, Scheme Smallholders and outgrowers and subcontractors, taking into account gender-specific needs, and which covers applicable aspects of the RSPO P&amp;C, in a form they understand, and which includes assessments of training.</p> <p>- Critical (Major) compliance -</p>	<p>OPG has in place training program which is developed on monthly basis. The program captures plan date for training, training topics, responsible person for the training, trainees, and location for the training. Training program for March to December 2020 was sighted for Lot2 and covers topics such as Chemical use, palm agronomy and deficiencies, fertilizers roles, applications methods and safety, communication skills, waste management, buffer zones and HCV management, grievance procedures, firefighting and emergency response, crop recovery and harvesting standards, LTA awareness, peat and diseases etc. Furthermore, the training program as sighted coves staff (referring to worker not working in the planation), gang leaders (CDQs) drivers, Olam workers (referring to workers working in the field) and contractual workers.</p>	Complied

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		<p>Similarly, the training program for Lot3 was sighted. The plan captures; date of training, training module by activity, training key element, training participant and location of training, remarks. Training records are kept electronically (with picture evidence) and manually (on file). All training conducted has feedback to capture worker understanding of the training. Training covers all staff including men, women, OPG staff as well as contractor staff. There are segregation during trainings. However, there are no Scheme Smallholders and outgrowers in OPG supply base.</p> <p>Training for Lot1 was also sighted captioned OPG Mouila/Lot1 – Annual Training Schedule 2020. The plan as reviewed addresses topics such as; RSPO General, RSPO PnC, Buffer Zones, HCV Boundaries, Protection of Endangered Species in Gabon, Spraying Technology &amp; Safety Procedures. Agripal, Harvesting/Pruning/Frond stacking, Racking &amp; loose fruit, Circle &amp; selective spraying, Manuring (NPK, Borax, SOA, Kesorite, RP), Peat and Diseases, BMP Management, Productivity and Cost.</p>	
3.7.2	<p>Records of training are maintained, where appropriate on an individual basis.</p> <p>- Minor Compliance -</p>	<p>Subsequently, OPG maintained training records electronically in the form of excel file and manually in the form of paper record for all trainings conducted. Sample of training seen and verified include;</p> <p>Lot2 (training conducted in Estate 7 and 9)</p> <p>1. Training topic – Spraying. The training covered definition of spraying, PPE usage, process and demonstration of spraying activity, productivity, time frame at work, chemical usage and risk, methods and techniques, new recommendation regarding spraying effectively, equipment and maintenance, various HR polices including discipline, work consciousness and self-motivation. The training was conducted on May 9<sup>th</sup>, 2020 at Div 3 block N-18 for 6 spraying team.</p>	Complied

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	<p>2. Training topic – Ripeness standards, progressive pruning, and importance of loose fruits, RSPO, 3Ps and safety. The training was conducted on 01/10/2020 at Div 2, block I-5 for 33 harvesting team.</p> <p>Lot3 (training conducted in Estate 13 and 14)</p> <p>1. Training topic – Harvesting for contractual gang. Training covered definition of harvesting, process and demonstration, canopy management and its relevant, palm botany, bunch classification and manipulation, loose fruit importance, OER loose fruit bunches, fronds upkeeps and disposal and various HR policies including discipline, work consciousness and self-motivation. This was conducted on 31/03/2020 at Div 2 block R-71.</p> <p>2. Training topic – Circle and path spraying. Training covered RSPO criteria’s (PnC) and recommendations, Safety (PPE wearing importance regarding chemicals in use and their impact to health due exposure), water pollution and prevention, circle path weeding, productivity, how to choose a nozzle, dosage recommendation reminders, flow rate related to the right nozzle and reduce it, application methods and technic reviewed, cost effective spraying and field supervision effectively for CDQ.</p> <p>3. Training topic – Refresher on Agripal Training for CDQs (Head Men/Women) – Agripal is a soft used in the field to records daily harvesting records, FFB collected, FFB on the grounds, and Loose on the ground and collected and all field issues. It also has in-built GPS to track the location of all CDQs. Training was conducted on 19/12/2019 at Div 1, 2,3</p> <p>Lot3:</p>	

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		<ol style="list-style-type: none"> <li>1. Training topic – RSPO/Spraying Technology. Training covered type of products used for spraying, how to wear PPE properly. Maintenance of equipment, technic of spraying, RSPO and risk of contamination. Training was conducted on 20/05/2020 for spraying team in Estate 6.</li> <li>2. Training topic – Harvesting. Training covered RSPO in general, Harvesting technic and ways of reducing loses, Safety and 3Ps of RSPO. Training was conducted on 21/10/2020 for harvesting team.</li> <li>3. Training topic – Motorbike Preventive Maintenance. Training conducted on 11/05/2020 for assistant managers.</li> </ol> <p>There are no exception in all trainings as it covers both men and women of all staff including Olam staff and sub-contractor staff. There are however no smallholders’ scheme and outgrowers in OPG supply base.</p>	
3.7.3	<p>Appropriate training is provided for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS). Training is specific and relevant to the task(s) performed.</p> <p>- Minor Compliance -</p>	<p>OPG has conducted supply chain update training for staff involved in the implementation of the SCCS. Based on evidence seen, the training was done online due to Covid-19 protocols (social distance). The training was done on 22/07/2020 and was organized by the Group Sustainability Manager. The training was attended by the 15 participant including OPG Awala team (sister company). The training which has been titled Refresher Training on RSPO SCCS standard covered; Overview on global and certified oil market, OPG Certification status, RSPO SCCS standard and system, SCCS Models, Recoding input and output, SCCS requirements and P&amp;C element for POM.</p>	Complied

**Criterion 3.8:** Supply chain requirement for mills  
(note: All supply chain requirements are considered as **Critical (C)**. However it will not contribute to suspension if there is more than 5 non-compliance within a principle)

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3.8.1	<p>Identity Preserved Module</p> <p>A mill is deemed to be Identity Preserved (IP) if the FFB processed by the mill are sourced from plantations/estates that are certified against the RSPO Principles and Criteria (RSPO P&amp;C), or against the Group Certification scheme.</p> <p>Certification for CPO mills is necessary to verify the volumes and sources of certified FFB entering the mill, the implementation of any processing controls (for example, if physical separation is used), and volume sales of RSPO certified products. If a mill process certified and uncertified FFB without physically separating them, then only Mass Balance Module is applicable.</p>	<p>OPG Bilala POM is certified to the Mass Balance supply chain module as captured in its application scope signed with BSI and also in its supply chain procedure (section 1 under scope) reference BLA_POM-KCP-SC/MB(05)/0820 dated 1<sup>st</sup> September. 2020.</p> <p>OPG receive certified MB (Palm Kernels) from it POM which is certified with RSPO certificate number RSPO671034.</p>	Complied
3.8.2	<p>Mass Balance Module</p> <p>A mill is deemed to be Mass Balance (MB) if the mill process FFB from both RSPO certified and uncertified plantations/estates. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own and 3rd party certified supply base. In that scenario, the mill can claim only the volume of oil palm products produced from processing of the certified FFB as MB.</p>	<p>OPG is implementing the Mass Balance supply chain as stated under section 1.2 (Scope) of the supply chain procedures - <i>RSPO Supply Chain &amp; Traceability Mass Balance Model with document # AW-POM-KCP-SC/MB(05)/0920 dated 1/09/2020, revision 5</i> and also captured on it current RSPO Certificate # RSPO 671034.</p>	Complied
3.8.3	<p>The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill shall be recorded by the certification body (CB) in the public summary of the P&amp;C certification report. This figure represents the total volume of certified oil palm product (CPO and PK) that the certified mill is allowed to deliver in a year. The actual tonnage produced shall then be recorded in each subsequent annual surveillance report.</p>	<p>OPG Mouila Bilala has estimated its CPO and PK that could potentially be produced and to be recorded in the report as;</p> <p>Estimate for next year (2021)</p> <p>FFB – 293,644MT</p> <p>CPO – 70,474.56 MT</p> <p>PK – 13,213.98 MT</p> <p>OER – 24%</p> <p>PKER – 4.5%</p>	Complied

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		Actual production figure for the year under review (Nov 2019 to Oct 2020) is reported as; FFB – 173,283.67 MT CPO – 41,799.76 MT PK – 7024.81 MT OER – 24.07% PKER – 4.05%	
3.8.4	The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO IT platform.	Olalm Palm Gabon is a subsidiary of Olam International with RSPO Membership ID – 1-0114-12-000-00. The mill however is registered on the RSPO IT Platform with Palmtrace ID RSPO_PO1000006576, expiring on 27-12-2020	Complied
3.8.5	<p>Documented procedures</p> <p>The mill shall have written procedures and/or work instructions or equivalent to ensure the implementation of all elements of the applicable supply chain model specified. This shall include at minimum the following:</p> <ul style="list-style-type: none"> <li>a) Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements.</li> <li>b) Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records).</li> <li>c) Identification of the role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the mill’s procedures for the implementation of this standard.</li> </ul>	<ul style="list-style-type: none"> <li>a. OPG Mouola Bilala POM has in place documented procedures for its supply chain captioned Mouila Plantation SOP – RSPO Supply Chain &amp; Traceability (Massa Balance Model), referenced <i>BLA_POM-KCP-SC/MB(05)/0820 dated 1<sup>st</sup> September. 2020.</i> The objective of the procedure is to establish a mechanism and implement a mass balance supply chain system for the Palm Oil Mill (POM) and integrated kernel crushing plant (KCP) to handle and account for certified and non-certified raw material (i.e. FFB) and products (i.e. CPO &amp; PKO) in the reception, production, delivery and stock balance that complies with the requirements of RSPO SCCS.</li> <li>b. OPG Mouola Bilala has conducted training on RSPO Supply Chain on 22/07/2020. Training was done virtual due to covid-19 restrictions. Training was facilitated by the Group Sustainability Manager with 15 participant present including the responsible person. Similarly training has been conducted for the weighbridge team on 07/08/2020 who were not part of the</li> </ul>	Complied

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	d) The mill shall have documented procedures for receiving and processing certified and non-certified FFBS including ensuring no contamination in the IP mill.	<p>virtual training. Weighbridge records and mass balance sheet sighted and verified also established compliance. Likewise review of contract and invoice for all certified product sold.</p> <p>c. The Lab Assistant has been identified as the person having overall responsibility for and authority over the implementation of OPG Bilala POM SCCS requirements and compliance with all applicable requirements.</p> <p>d. Not applicable as OPG is implementing MB, hence all materials are mixed. However the segregation of certified and un-certified FFBS is done on the MB sheet (OPG Mouila Bilala POM Palm product's COP &amp; PK MB Calculation Records Ref. no1.9)</p>	
3.8.6	<p>Internal Audit</p> <p>i) The mill shall have a written procedure to conduct annual internal audit to determine whether the mill:</p> <p>a. Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.</p> <p>b. Effectively implements and maintains the standard requirements within its organisation.</p> <p>ii) Any non-conformities found as part of the internal audit shall be issued corrective action. The outcomes of the internal audits and all actions taken to correct non-conformities shall be subject to management review at least annually. The mill shall maintain the internal audit records and reports.</p>	<p>OPG Mouola Bilala POM has internal audit procedure in place captioned Procedure de conduit des audits et controls internes (Procedure to conduct audit and internal control) referenced SOP NO/CRS AI (04)/0120 revision 04 dated 15/01/2020 as seen and verified and conform to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.</p> <p>The procedure covers;</p> <ol style="list-style-type: none"> <li>1. Responsibilities</li> <li>2. Audit procedure/How audit is carried</li> <li>3. Updating the procedure</li> <li>4. Corrective action and opportunity for improvement</li> <li>5. Audit process</li> <li>6. Audit planning</li> <li>7. Audit preparation</li> <li>8. Audit process proper (i.e. opening meeting etc.)</li> <li>9. Audit Report</li> <li>10. Corrective action and opportunity for improvement</li> </ol>	Complied



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		<p>11. Monitoring of implementation of corrective action</p> <p>Subsequently, has conducted internal audit on 09/07/2020. The audit was conducted by the RSPO Coordinators for the company. Two (2) nonconformities under indicators C3 and 5.3.1 and one (1) OFI under 5.8 were identified. Subsequently, management review has been conducted on 11/08/2020 with the outcome of the internal audit captured and discussed.</p>	
3.8.7	<p>Purchasing and Goods In</p> <p>i) The mill shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBs received.</p> <p>ii) The mill shall inform the CB immediately if there is a projected overproduction of certified tonnage.</p> <p>iii) The mill shall have a mechanism in place for handling non-conforming FFB and/or documents.</p>	<p>OPG Mouila Bilala POM receive goods in the form of FFB from it Lot1 and Lot3 estates certified under RSPO MB Supply chain and Lot2 estate as uncertified. OPG record all goods (FFB) coming in using FFB dispatch sheet and weighbridge ticket entries. Review of the ticket captures; date, estate name, block #, number of bunches, estimated kg (tonnes), unique ID number, RSPO claim (RSPO Certificate number and SC Model), driver's name and truck number etc. Entries are also done electronically using the SAP system. Review of the weighbridge sheet established compliance;</p> <p>Goods from certified source Lot1 and 3 with RSPO claim;</p> <ol style="list-style-type: none"> <li>1. Truck# AM 736 IT with unique ID from SAP 2020033218</li> <li>2. Truck# AJK 5IF with unique ID from SAP 202001947</li> </ol> <p>From uncertified source Lot2:</p> <ol style="list-style-type: none"> <li>3. Truck# AN 159 IT with unique ID from SAP 2020033213</li> <li>4. Truck# AJK 550 IT with unique ID from SAP 2020038302</li> </ol> <p>ii. Section 6.4c of OPG supply chain procedure mentioned that in the event of projected overproduction of certified tonnage, the mill shall inform CB immediately and make specific notes to the Mass Balance records. No evidence of over production sighted.</p>	Complied

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		iii. Section 6.1 of OPG supply chain procedures adequately address mechanism for handling of non-conforming FFB and/or documents as signed in OPG supply chain procedure.	
3.8.8	<p>Sales and Goods Out</p> <p>The supplying mill shall ensure that the following minimum information for RSPO certified products is made available in document form. The information shall be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation):</p> <ul style="list-style-type: none"> <li>a) The name and address of the buyer;</li> <li>b) The name and address of the seller;</li> <li>c) The loading or shipment / delivery date;</li> <li>d) The date on which the documents were issued;</li> <li>e) RSPO certificate number;</li> <li>f) A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations);</li> <li>g) The quantity of the products delivered;</li> <li>h) Any related transport documentation;</li> <li>i) A unique identification number.</li> </ul>	<p>Section 6.3 of OPC RSPO supply chain procedure captures Sales and Goods Out (Mass Balance). The procedure as seen and reviewed adequately addresses item a – i.</p> <p>OPG has sold certified goods under the year of review. Contract signed between OPG and buyer with reference # OPG/2020/43 dated 19/06/2020 sighted with reference # OPG/2020/43 dated 19/06/2020 sighted. The contract has OPG POM supply chain model (MB) and code (RSPO0671034). Similarly sales invoice was sighted as;</p> <ul style="list-style-type: none"> <li>a) The name and address of the buyer; sighted</li> <li>b) The name and address of the seller; - OPG Bilala POM</li> <li>c) The loading or shipment / delivery date; - 10/07/2020</li> <li>d) The date on which the documents were issued; 10/07/2020</li> <li>e) RSPO certificate number; - RSPO0671034</li> <li>f) A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations); - Crude POM, RSPO MB with FFA 7.0% Max on shipment/M&amp;I Max 0.5%</li> <li>g) The quantity of the products delivered; - 3125.597 MT</li> <li>h) Any related transport documentation; - BL and Invoice</li> </ul> <p>A unique identification number. – Ref to Invoice EXP/2020/07/01</p>	Complied
3.8.9	Outsourcing Activities	Section 6.6 of Olam Palm Gabon supply chain procedures (MOUILA BILALA PLANTATION RSPO SUPPLY CHAIN & TRACEABILITY -MASS BALANCE MODEL) captures OUTSOURCING ACTIVITIES. OPG does not outsource	Complied

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<p>i) The mill shall not outsource its milling activities. In cases where he mill outsources activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the mill holding the certificate shall ensure that the independent third party complies with relevant requirements of this RSPO Supply Chain Certification</p> <p>ii) The mill shall ensure the following:</p> <p>a) The mill has legal ownership of all input material to be included in outsourced processes</p> <p>b) The mill has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The onus is on the mill to ensure that certification body (CB) has access to the outsourcing contractor or operation if an audit is deemed necessary.</p> <p>c) The mill has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.</p> <p>d) The mill shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to their respective operations, systems, and all information, when this is announced in advance.</p>	<p>milling activities to an independent third party except the transportation of the CPO produced which is handle by a sister company – Gabon Special Economic Zone (GSEZ) which is a subsidiary of the Olam Group. All PK are transferred to the KCP which is integrated into the POM.</p> <p>There is a contract of agreement signed between both parties dated 28/09/2017 as per section 2 of the agreement. To ensure that GSEZ comply with the requirement of the RSPO supply chain certification standard, OPG has communicated to GSEZ via mail on 20/05/2020 that “due to the Covid-19 situation physical briefing won’t be possible”. Hence has made available to GSEZ through mail the following document for review;</p> <ol style="list-style-type: none"> <li>1. PPT briefing on RSPO</li> <li>2. SOP on RSPO Supply Chain &amp; Traceability (Mass Balance)</li> <li>3. Updated Complaint Management Procedure (internal and External Stakeholders)</li> <li>4. Updated RSPO Supply Chain Certification Standard.</li> </ol> <p>Furthermore, Section 6.6d of OPG SOP as well as briefing note communicated to contractor (GSEZ) says that “Olam Palm Gabon shall write to its outsourced contractor in advance to access to its outsourcing operation, system, or facilities if an audit is deemed necessary by internal or external party”.</p>	
<p>3.8.10 The mill shall record the names and contact details of all contractors used for the physical handling of RSPO certified oil palm products.</p>	<p>As per above.</p>	<p>Complied</p>
<p>3.8.11 The mill shall inform its CB in advance prior to conduct of its next audit of the names and contact details of any new contractor used for the physical handling of RSPO certified oil palm products.</p>	<p>No new contractor agreement signed by OPG aside GSEZ agreement.</p>	<p>Complied</p>

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<p>3.8.12 Record keeping</p> <p>i) The mill shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of this RSPO Supply Chain Certification Standard requirements.</p> <p>ii) Retention times for all records and reports shall be a minimum of two (2) years and shall comply with relevant legal and regulatory requirements and be able to confirm the certified status of raw materials or products held in stock.</p> <p>iii) For Identity Preserved Module, the mill shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis.</p> <p>iv) For Mass Balance Module, the mill:</p> <p>a) Shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis and / or three-monthly basis.</p> <p>b) All volumes of certified CPO and PK that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO.</p> <p>c) The mill can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three (3) months. However, a mill is allowed to sell short (i.e. product can be sold before it is in stock.</p>	<p>i. OPG Mouila Bilala POM keeps an updated report on it FFB, CPO and PK on a report captioned Olam Palm Gabon – Mouila Bilala POM (Palm Product’s (CPO &amp; PK) Mass Balance Calculation Record) Ref no 1.9. There is also an electronic system (SAP) which is used to record all FFB, CPO and PK and data is retrievable at any point in time. OPG also keep records on;</p> <ul style="list-style-type: none"> <li>- FFB dispatch chits,</li> <li>- CSPO/CSPKO weighbridge tickets</li> <li>- Delivery orders, weighbridge document and records</li> <li>- Any returned CSPO weighbridge tickets from refinery</li> <li>- Daily production report</li> <li>- Sales contracts and invoices</li> </ul> <p>ii. According to OPG supply chain procedure, all relevant documents in relation to RSPO SCCS certification must be kept for minimum 2 years.</p> <p>iii. Not applicable as the POM is implementing MB</p> <p>iv. OPG records and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis and on three-monthly basis as captured on the Mass Balance sheet mentioned in point (i) above. The Mass balance sheet as sighted does all deductions of volumes certified CPO and PK that are delivered. Conversion ratio is also stated. OPG deliver Mass Balance sales from a positive stock as sighted on the Mass Balance and also from the palmtrace.</p>	<p>Complied</p>
<p>3.8.13 Extraction Rate</p>	<p>OPG Mouila Bilala POM has defined it extraction rate as output (CPO) over input (FFB) multiply by 100%. The extraction rate has</p>	<p>Complied</p>

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	The oil extraction rate (OER) and the kernel extraction rate (KER) shall be applied to provide a reliable estimate of the amount of certified CPO and PK from the associated inputs. Mill shall determine and set their own extraction rates based upon past experience, documented and applied it consistently.	also been define in it Mass Balance sheet. Subsequently, OPG Bilala POM has set it extraction for POM (OER) as - 24.03% and PKER – 4.05%	
3.8.14	Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate.	According to the OPG Mass Balance Sheet, extraction rate will be updated on monthly basis. Review of the Mass Balance November 2019 to October 2020 established compliance.	Complied
3.8.15	Processing For Identity Preserved Module, the mill shall assure and verify through documented procedures and record keeping that the RSPO certified oil palm product is kept separated from non-certified oil palm products, including during transport and storage to strive for 100% separation.	Not Applicable.	Not Applicable
3.8.16	Registration of Transactions i) Shipping Announcement in the RSPO IT platform shall be carried out by the mills when RSPO certified products are sold as certified to refineries, crushers, and traders not more than three months after dispatch with the dispatch date being the Bill of Lading or the dispatch documentation date. ii) Remove: RSPO certified volumes sold under different scheme or as conventional, or in case of underproduction, loss or damage shall be removed in the RSPO IT platform.	OPG has sold under year of review CSPO 3123.6 MT with transaction registered in palmtrace with transaction ID TR-2c409de6-0c45 dated 10/07/2020. Shipping announcement and confirmation done. Similarly 15,000 MT CSPO credit sales with transaction registered in palmtrace with ID ST-TR-a423b40c-db4a dated 05/09/2020.	Complied
3.8.17	Claims The mill shall only make claims regarding the production of RSPO certified oil that are in compliance with the RSPO Rules on Market Communications and Claims.	OPG make Business-to-business communication in the form of shipping documentation on invoices. No trademark usage apart from General corporate communication in digital form on the website ( <a href="https://www.olamgroup.com/sustainability/sustainable-">https://www.olamgroup.com/sustainability/sustainable-</a>	Complied

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		supply-chains/sustainable-palm-oil.html) and Sustainable Palm Oil Policy. No evidence of business-to-consumer communication. OPG is also registering all its certified transaction on the IT Platform (Palmtree).	
<b>General corporate communications</b>			
4.1	A corporate communication is one made by any RSPO member that highlights its membership of the RSPO and/or its commitment to the principles of the RSPO. Corporate communication is an 'off-product' claim.	OPG Mouila Bilala POM is not making any claim in the form of General Corporate Communication. The company has a valid trademark with license number 1-0114-12-000-00 starting from 20th December, 2018 ending on 19 <sup>th</sup> December, 2020. However, the company is not using any RSPO mark either on-product or off-product.	Complied
4.2	In corporate communications a member is allowed to: a. Display its RSPO membership status b. Display the RSPO web address (www.rsपो.org) c. State that the member supports the work of the RSPO d. State the member's history with regard to the RSPO. e. Use the RSPO trademark to promote its membership of the RSPO. Additionally, where an RSPO member displays the RSPO trademark in digital format this must be accompanied by the text 'Check our progress at www.rsपो.org' where the link must lead to the member's profile page.	Not applicable as per above	Not Applicable
4.3	In corporate communications RSPO members must not make any statement that may lead consumers to believe that RSPO membership by itself implies the selling of RSPO-certified oil palm products.	Not applicable as per above	Not Applicable

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4.4	Members must ensure that all communication is consistent, clear and cannot mislead consumers or other stakeholders as to the certified content of oil palm products in the member's own products.	Not applicable as per above	Not Applicable
4.5	Members are not allowed to use the RSPO corporate logo as shown in the RSPO Rules on Market Communications & Claims document. This is for the sole use of the RSPO secretariat.	Not applicable as per above	Not Applicable
<b>Business to business communications</b>			
5.1	Business to Business communication relates to RSPO members in the supply chain selling to and/or communicating with other organizations in the supply chain about the use of certified sustainable oil palm products.	OPG is making Business-to-business communication in the form of shipping documentation on invoices by stating RPSO certificate number and supply chain model. No trademark usage.	Complied
5.2	When confirming the sale of certified oil palm products, members must adhere to the requirements of the RSPO SCCS. This includes stating the supply chain model and certificate number under which the claim is being made.	As per above, OPG Mouila Bilala state its RSPO Certificate code - RSPO 671034 as well as its RSPO supply chain model - MB on all sales documents including contracts and invoices.	Complied
5.3	Where a distributor or wholesaler takes title to products containing certified sustainable oil palm products, the requirements of the RSPO SCCS can follow either of two options: a. If the distributor or wholesaler holds only a Distributor license, it may only communicate RSPO-certified oil palm products by linking the product to the manufacturer using the manufacturer's SCCS certificate number. This covers both brand and own brand products. However, in the case of own brand products it is essential that customers are aware that the product has been made on behalf of the distributor or wholesaler, with specific evidence either through on-pack claims or documentation.	Not applicable as the OPG Mouila Bilala is not a distributor or wholesaler	Not Applicable

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	b. If the distributor or wholesaler is supply chain-certified they should follow the requirements outlined in section 5.2.		
<b>Business to consumer communication</b>			
6.1	Only RSPO members that have supply chain certification are allowed to make business to consumer claims about the certified sustainable oil palm products contained within product(s), which are known as 'product-specific' claims. Product-specific claims are voluntary.	Not applicable as OPG only does business to business communication.	Not Applicable
6.2	Only RSPO members who have supply chain certification are authorised to use the RSPO trademark and/or RSPO label, with the exception of RSPO Credits and of retailers in accordance with 6.8 below.	As per above.	Not Applicable
6.3	When on-pack claims on RSPO-certified sustainable oil palm products are used, the RSPO trademark and associated identification number must be present.	As per above.	Not Applicable
6.4	Business to consumer communication shall not include information about the claimant's RSPO membership status.	As per above.	Not Applicable
6.5	Members shall not communicate to consumers' information about their suppliers' RSPO membership status.	As per above.	Not Applicable
6.6	Use of the RSPO trademark is restricted to claims about RSPO-certified sustainable palm oil products and it is not authorised for use in relation to any other ingredient.	As per above.	Not Applicable
6.7	Use of any other trademark or logo to highlight the presence of RSPO-certified sustainable oil palm products is an unauthorised product-specific claim.	As per above.	Not Applicable
6.8	RSPO members who are retailers or food service companies can apply for an RSPO trademark license for use in business to consumer	As per above.	Not Applicable



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	communications, provided they can demonstrate the validity of these claims to an RSPO-accredited certification body (CB). This will be undertaken via a remote audit, prior to the trademark use, during which the retailer or food service company will need to demonstrate that the use of the trademark is in compliance with the rules contained within this document and that the claim itself can be supported through a certified supply chain. Any other palm oil claims, including those highlighting the absence of palm oil, must be highlighted to the CB during the audit to ensure that all claims comply with the requirements of these rules. The CB will confirm the outcome of these audits, to be conducted annually, to RSPO who may continue to grant a trademark license or withdraw permission based upon the audit findings. This is in keeping with the rules applying to RSPO supply chain certified members. The guidance document for audits is available on <a href="http://www.rspo.org">www.rspo.org</a> .		
<b>MODULE B – MASS BALANCE SPECIFIC RULES</b>			
<b>Minimum Mass Balance content</b>			
	95% or above of the oil palm content must be RSPO MB-certified.	OPG Bilala POM is producing CPO and PK 100% MB as it's a primary producer.	Not Applicable
	Where there is any percentage of non-certified oil palm within the product, the reason for this must be fully justified and an action plan for moving to fully certified oil palm must be in place, in accordance with the requirements of the RSPO SCCS. In addition, the non-certified volume must be covered by equivalent volume of RSPO Credits.	Not applicable as per above	Not Applicable
<b>Labelling and trademark (MB)</b>			
	Members are allowed to use the RSPO label in one of the following ways:	Not applicable as no product claim is made by the POM	Not Applicable

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<ul style="list-style-type: none"> <li>Surrounded by the text: 'Certified sustainable palm oil'.</li> <li>The RSPO label MUST contain the tag 'MIXED'. The tag MIXED designates oil palm products sourced under the Mass Balance (MB) supply chain system, which administratively balances inputs and outputs of certain palm oil volumes. The tag 'MIXED' on a product does not guarantee that the product itself contains the certified material; some or all of it may reside in a product that does not carry a claim.</li> <li>The RSPO label can also include the statement: '[The palm oil contained in this product] contributes to the production of certified sustainable palm oil'.</li> <li>Wherever the RSPO trademark is displayed, the applicable trademark license number must be shown immediately under or next to the trademark or the 'statement'. Font must be Calibri, font size must be at least 4 pt (1.4 mm or 0.06 inch).</li> <li>In on-pack communications, the RSPO trademark can be printed anywhere on the pack. Further guidance on use of the trademark is provided in the RSPO Trademark License Terms and Conditions and in Annex 1 of the Rules on Market Communications &amp; Claims document.</li> </ul>		
<b>Messaging (MB)</b>		
<p>Messaging ALLOWED in storytelling in product-related communications includes:</p> <ul style="list-style-type: none"> <li>[Oil palm products]/[palm oil]/[palm kernel oil] from RSPO-certified mills and plantations were mixed with non-certified oil palm products in the supply chain.</li> </ul>	Not applicable as per above	Not Applicable

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	<ul style="list-style-type: none"> <li>The volume of [oil palm products][palm oil]/[palm kernel oil] in this product reflects an equivalent volume of palm oil or palm kernel oil produced by RSPO certified mills and plantations.</li> </ul> <p>In off-product communications, reference to (or images of) particular RSPO-certified production units, if the relationship to those units can be shown in company records is allowed.</p> <p>Messaging NOT ALLOWED in storytelling in product-related communications:</p> <ul style="list-style-type: none"> <li>Anything that can lead consumers to believe that RSPO-certified palm products are (certified to be) part of the product.</li> </ul>		
<b>Principle 4: Respect community and human rights and deliver benefits</b>			
<b>Criterion 4.1:</b> The unit of Certification respects human rights, which includes respecting the rights of Human Rights Defenders.			
4.1.1	<p><b>(C)</b> A policy to respect human rights, including prohibiting retaliation against Human Rights Defenders (HRDs), is documented and communicated to all levels of the workforce, operations, supply chain and local communities and prohibits intimidation, corruption and harassment by the unit of certification and contracted services, including contracted security forces.</p> <p>- Critical (Major) compliance -</p>	Olam has developed a policy on Human Rights (Olam Palm Gabon: Politique de respect de Droits Humains) of 01/09/2019, which includes rights to work, prohibition of child and forced labour, work conditions, salaries and advantages, diversity and inclusion, health at the workplace, freedom of association and collective bargaining (Section 5). The Human Rights Policy is complemented by a Policy on Denunciation (Olam International Limited: Politique de Denonciation), of August 2018 and revised in June 2019.	Complied
4.1.2	<p>The unit of certification does not instigate violence or use any form of harassment, including the use of mercenaries and paramilitaries in their operations.</p> <p>- Minor compliance -</p>	Olam’s Policy on Human Rights prohibits the use of any form of harassment, including the use of mercenaries and paramilitaries in their operations.	Complied
<b>Criterion 4.2:</b> There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all affected parties			

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4.2.1	<p><b>(C)</b> The mutually agreed system, open to all affected parties, resolves disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants, HRDs, community spokespersons and whistleblowers, where requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRDs.</p> <p>- Critical (Major) compliance -</p>	<p>Complaint and grievance procedure were available named "Procédure de Gestion des plaints et reclamations" Ref SOP N°07/CRS-GP (7)/0120 Revision 07 of 15<sup>th</sup> January 2020.</p> <p>Procedures includes clause for whistleblower, HRD, community spokesperson and anonymity. Interviews confirmed that no reprisal or intimidation were observed.</p> <p>Interviews done with stakeholders and workers revealed that they understood the procedure and its process.</p>	Complied
4.2.2	<p>Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties.</p> <p>- Minor compliance -</p>	<p>Complaint and grievance procedure were available named "Procédure de Gestion des plaints et reclamations" Ref SOP N°07/CRS-GP (7)/0120 Revision 07 of 15<sup>th</sup> January 2020. Annex 1 of this procedure constitutes a grievance form for reporting all complaints, both internal and external.</p> <p>Interviews with different stakeholders: gender committee, worker representatives, workers, sub-contractors, revealed that this procedure is well understood by all affected parties.</p> <p>From 18<sup>th</sup> September to 06<sup>th</sup> October 2020, explanation meeting of this procedure has been done in 7 location of Lot 2. These include:</p> <ul style="list-style-type: none"> <li>• Fanguindaka</li> <li>• Lambaréné-kili</li> <li>• Bemdoubié</li> <li>• Bougounga</li> <li>• Kanana</li> <li>• Diangui</li> <li>• Mandji</li> </ul>	Complied

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		Also, Interviews done with stakeholders and workers at Lot 3 and Lot 1 revealed that they understood the procedure and its process.	
4.2.3	<p>The unit of certification keeps parties affected by a grievance informed of its progress, including against agreed timeframe and the outcome is available and communicated to relevant stakeholders.</p> <p>- Minor compliance -</p>	<p>Complaint and grievance procedure were available named "Procédure de Gestion des plaints et reclamations" Ref SOP N°07/CRS-GP (7)/0120 Revision 07 of 15<sup>th</sup> January 2020.</p> <p>From review:</p> <p>Lot 2:</p> <p>On January 2018, complaint was received due to destruction des sites sacrées du villages. Village meeting report from 12th January 2018: Presentation of the issue. On 19th January 2018: Physical inspection with OLAM team and acceptance of response from OLAM from compensation. On 7th February 2018: Complaint form filed because villagers refused to fill the files initially. Complaint closed on 14<sup>th</sup> June 2018 by the acknowledgment of receipt of the compensation amount.</p> <p>Lot 3:</p> <p>On 14/06/20, complaint has been received from location named Sanga concerning quality of water which was not good, and drilling is taking time to finish according to them. Report of verification on site by Olam social team has been done on 14/06/20. Meeting with villages people was done at Mbengui in presence of the Canton Chief and representative person of Sanga. Form this meeting, temporary agreement between villagers and Olam has been defined. It was a delivery of water 3 times per week. On 17/06/20, meeting in the location of Sanga finalize he agreement for the delivery of water 2 times per week with the increase of the quantity initially agreed. Contract with the contractor in charge of the</p>	Complied

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		<p>construction of drilling has been resigned on the construction on 04<sup>th</sup> November 2020. A new contractor company has been contacted and negotiation is still on-going. Until the beginning of January 2021, construction of the drilling could restart again according to the negotiation done. Delivery register of water in the village has been reviewed. It confirms that village received the quantity of water on time defined. The complaint is still opened until the delivery of the drilling water to the location named Sanaga.</p>															
4.2.4	<p>The conflict resolution mechanism includes the option of access to independent legal and technical advice, the ability for complainants to choose individuals or groups to support them and/or act as observers, as well as the option of a third-party mediator.</p> <p>- Minor compliance -</p>	<p>Complaint and grievance procedure were available named "Procédure de Gestion des plaints et reclamations" Ref SOP N°07/CRS-GP (7)/0120 Revision 07 of 15<sup>th</sup> January 2020.</p> <p>It is clearly mentioned in the procedure that the complainants could choose individuals or groups to support them and/or act as observers, as well as the option of a third-party mediator for any assistance.</p> <p>For example:</p> <p>Lot 3,</p> <p>From the interview done with villages representatives persons from Mbengui; Mbadi and mounigou, they aware that they can choose individuals or groups to support them and/or act as observers, as well as the option of a third-party mediator.</p> <table border="1"> <thead> <tr> <th>Village</th> <th>Date</th> <th>Content</th> <th>N° of participant</th> </tr> </thead> <tbody> <tr> <td>Mbadi</td> <td>04/02/20</td> <td rowspan="3">Explanation on Complaint and grievance procedure</td> <td>5</td> </tr> <tr> <td>Nanga</td> <td>04/02/20</td> <td>6</td> </tr> <tr> <td>Mounigou</td> <td>31/01/20</td> <td>13</td> </tr> </tbody> </table>	Village	Date	Content	N° of participant	Mbadi	04/02/20	Explanation on Complaint and grievance procedure	5	Nanga	04/02/20	6	Mounigou	31/01/20	13	Complied
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<b>Criterion 4.3:</b> The unit of Certification contributes to local sustainable development as agreed by local communities.																													
4.3.1	Contributions to community development that are based on the results of consultation with local communities are realised and documented. - Minor compliance -	Social contracts were signed with communities and projects done were reviewed. For example: Lot 2: Social contracts signed with communities on 25 <sup>th</sup> July 2014 at Mandji in presence of all villages Chiefs, local authorities, Olam Mouila Director, Department Prefect of Ndolou, Mayor of Mandji and Governor of Ngouiné Province. Agreement was also signed with village named Bemboudie on Mars 2017. It has been updated on 08 <sup>th</sup> July 2019. Below a summary of projects statement from social contracts signed:				Complied																							

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Criterion / Indicator		Assessment Findings				Compliance														
		Saint-Martin	8	0	3															
		Migabe	5	0	7															
<b>Criterion 4.4:</b> Use of the land for oil palm does not diminish the legal, customary or user rights of other users without their free, prior and informed consent.																				
4.4.1	<p><b>(C)</b> Documents showing legal ownership or lease, or authorised use of customary land authorised by customary landowners through a Free, Prior and Informed (FPIC) process. Documents related to the history of land tenure and the actual legal or customary use of the land are available.</p> <p>- Critical (Major) compliance -</p>	<p>Olam Palm Gabon Mouila has legal use rights. For example:</p> <p>i. Lot 2:            Area: 31,800 ha            Convention n° 0006 portant baux emphythéotiques signed by the president of the republic of Gabon on 13<sup>th</sup> November 2012.            Use period: 50 years            Legal use rights are obtained.            Below consent given by villages and the date corresponding:</p> <table border="1"> <thead> <tr> <th>Village / parties</th> <th>Date of consent</th> </tr> </thead> <tbody> <tr> <td>Mandji</td> <td>25<sup>th</sup> July 2014</td> </tr> <tr> <td>Diangui</td> <td>25<sup>th</sup> July 2014</td> </tr> <tr> <td>Kanana</td> <td>25<sup>th</sup> July 2014</td> </tr> <tr> <td>Fanguidaka</td> <td>25<sup>th</sup> July 2014</td> </tr> <tr> <td>Lambarene-Kili</td> <td>25<sup>th</sup> July 2014</td> </tr> <tr> <td>Bemboudie</td> <td>Mars 2017</td> </tr> </tbody> </table> <p>ii. Lot 3:            Area: 24,492.963 ha; 19,596.3 ha and 23,763 ha</p>				Village / parties	Date of consent	Mandji	25 <sup>th</sup> July 2014	Diangui	25 <sup>th</sup> July 2014	Kanana	25 <sup>th</sup> July 2014	Fanguidaka	25 <sup>th</sup> July 2014	Lambarene-Kili	25 <sup>th</sup> July 2014	Bemboudie	Mars 2017	Complied
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Criterion / Indicator	Assessment Findings	Compliance																		
	<p>N°001/MIHAT/ANUTTC of 22nd April 2015            Use period: 50 years            Legal use rights are obtained on 28<sup>th</sup> May 2015.            Below consent given by villages and the date corresponding:</p> <table border="1" data-bbox="1137 576 1928 1023"> <thead> <tr> <th>Village / parties</th> <th>Date of consent</th> </tr> </thead> <tbody> <tr> <td>Quartier Bavanda</td> <td>28<sup>th</sup> May 2015</td> </tr> <tr> <td>Mbadi</td> <td>28<sup>th</sup> May 2015</td> </tr> <tr> <td>Moutassou</td> <td>28<sup>th</sup> May 2015</td> </tr> <tr> <td>Moulandoufouala</td> <td>28<sup>th</sup> May 2015</td> </tr> <tr> <td>Okoumbou Makanda</td> <td>28<sup>th</sup> May 2015</td> </tr> <tr> <td>Ikolo</td> <td>28<sup>th</sup> May 2015</td> </tr> <tr> <td>Koumbanou Maramba</td> <td>28<sup>th</sup> May 2015</td> </tr> <tr> <td>Douya</td> <td>28<sup>th</sup> May 2015</td> </tr> </tbody> </table> <p>iii. Lot 3 extension:            Area: 14,604.920 ha            N°052 portant concession d'un bail emphytéotique of 14<sup>th</sup> September 2016            Use period: 50 years            Legal use rights are obtained by social signed Ref 0013 OPG of 28<sup>th</sup> March 2017.</p>	Village / parties	Date of consent	Quartier Bavanda	28 <sup>th</sup> May 2015	Mbadi	28 <sup>th</sup> May 2015	Moutassou	28 <sup>th</sup> May 2015	Moulandoufouala	28 <sup>th</sup> May 2015	Okoumbou Makanda	28 <sup>th</sup> May 2015	Ikolo	28 <sup>th</sup> May 2015	Koumbanou Maramba	28 <sup>th</sup> May 2015	Douya	28 <sup>th</sup> May 2015	
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Criterion / Indicator		Assessment Findings	Compliance																		
		<p>iv. Lot 1: Area: 35,354 ha Convention n° 0006 portant baux emphythéotiques signed by the president of the republic of Gabon on 13<sup>th</sup> November 2012. Use period: 50 years Legal use rights are obtained by social signed Ref 0013 OPG of 30<sup>th</sup> July 2012. Below consent given by villages and the date corresponding:</p> <table border="1"> <thead> <tr> <th>Village / parties</th> <th>Date of consent</th> </tr> </thead> <tbody> <tr> <td>Guidouma</td> <td>30/07/2012</td> </tr> <tr> <td>Rembo</td> <td>30/07/2012</td> </tr> <tr> <td>Mboukou</td> <td>30/07/2012</td> </tr> <tr> <td>Doubou</td> <td>30/07/2012</td> </tr> <tr> <td>Moutambe Sane Foumou</td> <td>30/07/2012</td> </tr> <tr> <td>Guiamba</td> <td>30/07/2012</td> </tr> <tr> <td>Saint-Martin</td> <td>30/07/2012</td> </tr> <tr> <td>Migabe</td> <td>30/07/2012</td> </tr> </tbody> </table>	Village / parties	Date of consent	Guidouma	30/07/2012	Rembo	30/07/2012	Mboukou	30/07/2012	Doubou	30/07/2012	Moutambe Sane Foumou	30/07/2012	Guiamba	30/07/2012	Saint-Martin	30/07/2012	Migabe	30/07/2012	
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4.4.2	Copies of documents evidencing agreement-making processes and negotiated agreements detailing the FPIC process are available and include:	OPG Mouila has a procedure for FPIC process named "Procédure de conduit du processus CLIP" Ref SOP N°01/CRS CLIP (3)/0319 Revision 03 of 11 <sup>th</sup> March 2019.	Complied																		

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Criterion / Indicator		Assessment Findings	Compliance
		For example: In lot 3, Social contracts signed with communities on 25 <sup>th</sup> July 2014 at Mandji in presence of all villages Chiefs, local authorities, Olam Mouila Director, Department Prefect of Ndolou, Mayor of Mandji and Governor of Ngouiné Province, Ref 006 OPG of 25 <sup>th</sup> July 2014. Agreement was also signed with village named B emboudie on Mars 2017. It has been updated on 08 <sup>th</sup> July 2019, Ref 009/OPG of 30 <sup>th</sup> May 2020. These contracts are the achievement of FPIC process.	
4.4.2a	Evidence that a plan has been developed through consultation and discussion in good faith with all affected groups in the communities, with particular assurance that vulnerable, minorities' and gender groups are consulted, and that information has been provided to all affected groups, including information on the steps that are taken to involve them in decision making. - Minor compliance -	In all lots, from all social contracts reviewed, villages chiefs given their consent by signing the contracts in presence of local authorities and Olam's Director and Managing staff. Annex of the contracts present also the named and the signature of villagers present during the signing sessions.	Complied
4.4.2b	Evidence that the unit of certification has respected communities' decisions to give or withhold their consent to the operation at the time that these decisions were taken. - Minor compliance -	<p>i. Lot 2: On 25<sup>th</sup> July 2014, communities given their consent to OPG. Communities of Bemboudie given his consent on March 2017. Development portion of village has been delimited as conservation area. Villages have access to this area at any time.</p> <p>ii. Lot 3: On 28<sup>th</sup> May 2015 and 07<sup>th</sup> March 2017, communities given their consent to OPG. Villages have access to this area at any time.</p>	Complied
4.4.2c	Evidence that the legal, economic, environmental and social implications of permitting operations on their land have been understood and accepted by affected communities, including the implications for the legal	Concession has been leased to OPG by the government of Gabon for 50 years. Upon expiring of the land lease, the land will be surrender to the government.	Complied

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	status of their land at the expiry of the unit of certification's title, concession or lease on the land. - Minor compliance -		
4.4.3	<b>(C)</b> Maps of an appropriate scale showing the extent of recognised legal, customary or user rights are developed through participatory mapping involving affected parties (including neighbouring communities where applicable, and relevant authorities). - Critical (Major) compliance -	Maps of all lot were available and have been reviewed. For example: i. Lot 2: Map of Lot 2 concession is available, Ref PFA 01/12 of 31 800 ha. It has been edited on February 2012 by the Ministry of Water and Forest. Scale is 1/70 000. ii. Lot 1: Map of Lot 2 concession is available, Ref PFA 01/12 of 35, 354 ha. It has been edited on October 2011 by the Ministry of Water and Forest. Scale is 1/100 000.	Complied
4.4.4	All relevant information is available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements. - Minor compliance -	All relevant information and document are available in French version. French is the national language in Gabon. For example: Social contracts, procedures, meeting minutes, SEAI.	Complied
4.4.5	<b>(C)</b> Evidence is available to show that communities are represented through institutions or representatives of their own choosing, including by legal counsel if they so choose. - Critical (Major) compliance -	There was not legal counsel representing the village interviewed. <ul style="list-style-type: none"> <li>The village of chiefs of Diangui, Kanana, Fanguidaka, Lambarene-Kili ande Bemboudie confirmed that there is no required legal counsel.</li> <li>The village of chiefs of Nanga, Mbadi and Mounigou confirmed that there is no required legal counsel.</li> <li>The village of chiefs of Guidouma, Mboukou, Moutambe Sane Foumou, Guiamba, Saint-Martin, Migabe confirmed that there is no required legal counsel.</li> </ul>	Complied

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Criterion / Indicator		Assessment Findings	Compliance
4.4.6	<p>There is evidence that implementation of agreements negotiated through FPIC is annually reviewed in consultation with affected parties.</p> <p>- Minor compliance -</p>	<p>Due to COVID-19 situation, planning of social projects with communities was not done. But, communication to all communities in order to inform them and plan the meeting in best time has been addressed on 23<sup>rd</sup> November 2020. Governor of Ngounie Province should authorize this meeting when sanitary situation will be favorable. Letter has been sent to him with acknowledgment of receipt on 24<sup>th</sup> November 2020.</p> <p>However, annual review of social contract implementation was not yet done at the time of the audit. Indeed, the number of participants and the risk of contamination didn't permit organization of meetings. All villages concerned with social contracts, including local authorities and the Provincial Governor have been informed via written correspondence and proof of acknowledgement of receipt of the correspondence (dated September and November 2020) is available.</p>	OFI
<p><b>Criterion 4.5:</b> No new plantings are established on local peoples' land where it can be demonstrated that there are legal, customary or user rights, without their FPIC. This is dealt with through a documented system that enables these and other stakeholders to express their views through their own representative institutions.</p>			
4.5.1	<p><b>(C)</b> Documents showing identification and assessment of demonstrable legal, customary and user rights are available.</p> <p>- Critical (Major) compliance -</p>	<p>The assessment was conducted with participatory with the villagers. The participatory was confirmed during the interview with the selected 8 villages. No new was establish in all lot.</p>	Complied
4.5.2	<p><b>(C)</b> FPIC is obtained for all oil palm development through a comprehensive process, including in particular, full respect for their legal and customary rights to the territories, lands and resources via local communities' own representative institutions, with all the relevant information and documents made available, with option of resourced access to independent advice through a documented, long-term and two-way process of consultation and negotiation.</p>	<p>The main negotiation of the consent for OPG's development is the agreement of social contract. Meeting minutes and attendance evidence for conducting the consultation and negotiation were reviewed.</p>	Complied

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Criterion / Indicator		Assessment Findings	Compliance
	- Critical (Major) compliance -		
4.5.3	<p>Evidence is available that affected local peoples understand they have the right to say 'no' to operations planned on their lands before and during initial discussions, during the stage of information gathering and associated consultations, during negotiations, and up until an agreement with the unit of certification is signed and ratified by these local peoples. Agreements have to be negotiated and entered into voluntarily prior to new operations and without coercion.</p> <p>- Minor compliance -</p>	All communities affected given their consent to Olam. Copies of all social contracts signed were reviewed.	Complied
4.5.4	<p>To ensure local food and water security, as part of the FPIC process, participatory SEIA and participatory land-use planning with local peoples, the full range of food and water provisioning options are considered. There is transparency of the land allocation process.</p> <p>- Minor compliance -</p>	Same as 4.5.1	Complied
4.5.5	<p>Evidence is available that the affected communities and rights holders have had the option to access information and advice, that is independent of the project proponent, concerning the legal, economic, environmental and social implications of the proposed operations on their lands.</p> <p>- Minor compliance -</p>	Same as 4.5.1	Complied
4.5.6	<p>Evidence is available that the communities (or their representatives) gave consent to the initial planning phases of the operations prior to the issuance of a new concession or land title to the operator.</p> <p><b>PROCEDURAL NOTE:</b>            In Gabon, it is the State which grants the concessions. The operator will then identify the areas of activity with the populations and obtain consent for the implementation of the project.</p>	Same as 4.5.1	Complied

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Criterion / Indicator		Assessment Findings	Compliance
	- Minor compliance -		
4.5.7	<p>New lands will not be acquired for plantations and mills after 15 November 2018 as a result of recent (2005 or later) expropriations in the national interest without consent (eminent domain), except in cases of smallholders benefitting from agrarian reform or anti-drug programmes.</p> <p><b>PROCEDURAL NOTE:</b>            In Gabon, it is the State which grants the concessions. The operator will then identify the areas of activity with the populations and obtain consent for the implementation of the project. The promoter identifies the populations living near his concession, informs them and decides, with them, of the co-management elements in the common areas.</p> <p>- Minor compliance -</p>	Same as 4.5.1	Complied
4.5.8	<p><b>(C)</b> New lands are not acquired in areas inhabited by communities in voluntary isolation.</p> <p>- Critical (Major) compliance -</p>	Same as 4.5.1	Complied
<p><b>Criterion 4.6:</b> Any negotiations Concerning compensation for loss of legal, customary or user rights are dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.</p>			
4.6.1	<p><b>(C)</b> A mutually agreed procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, is in place.</p> <p>- Critical (Major) compliance -</p>	Same as 4.4.2 above	Complied
4.6.2	<p><b>(C)</b> A mutually agreed procedure for calculating and distributing fair and gender-equal compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation.</p> <p>- Critical (Major) compliance -</p>	<p>i. Lot 2</p> <p>Based on the FPIC, social contracts have been signed including projects for villages.</p> <p>Once a year, pilot committee has a meeting in order to make a summary of all social projects. Last meeting of pilot committee was</p>	Complied



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Criterion / Indicator		Assessment Findings	Compliance
		<p>done on 17<sup>th</sup> December 2018. From this last meeting, meeting with surveillance committee in each village were done in order to monitor the social projects from 11<sup>th</sup> to 12<sup>th</sup> November 2020.</p> <p>ii. Lot 3: Based on the FPIC, social contracts have been signed including projects for villages. Once a year, pilot committee has a meeting in order to make a summary of all social projects. Last meeting of pilot committee was done on 13<sup>th</sup> November 2019.</p> <p>iii. Lot 1: Based on the FPIC, social contracts have been signed including projects for villages. Once a year, pilot committee has a meeting in order to make a summary of all social projects. Last meeting of pilot committee was done on 25<sup>th</sup> October 2019.</p>	
4.6.3	<p>Evidence is available that equal opportunities are provided to both men and women to hold land titles for small holdings.</p> <p><b>PROCEDURAL NOTE:</b> In Gabon, land belongs to the State. For this reason, operators have no influence on the allocation of land titles. - Minor compliance -</p>	Land has been given by the government of Gabon for 50 years by convention signed.	Complied
4.6.4	The process and outcomes of any negotiated agreements, compensation and payments are documented, with evidence of the participation of affected parties, and made publicly available to them.	From the social contracts, many payments and benefits were received by Villages.	Complied

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Criterion / Indicator		Assessment Findings	Compliance
	- Minor compliance -		
<b>Criterion 4.7:</b> Where it can be demonstrated that local peoples have legal, customary or user rights, they are compensated for any agreed land acquisitions and relinquishment of rights, subject to their FPIC and negotiated agreements.			
4.7.1	<b>(C)</b> A mutually agreed procedure for identifying people entitled to compensation is in place. - Critical (Major) compliance -	There was no compensation observed since previous assessment until now.	Complied
4.7.2	<b>(C)</b> A mutually agreed procedure for calculating and distributing fair compensation (monetary or otherwise) is in place and documented and made available to affected parties. - Critical (Major) compliance -	There was no compensation observed since previous assessment until now.	Complied
4.7.3	Communities that have lost access and rights to land for plantation expansion are given opportunities to benefit from plantation development. - Minor compliance -	Olam Plam Gabon Mouila had not expanded it plantation. Communities access and rights to land for plantation expansion are given opportunities to benefit from plantation development. In case of employment, in lot 2 56 persons from villagers are employed. In Lot 3, it is 185 persons.	Complied
<b>Criterion 4.8:</b> The right to use the land is demonstrated and is not legitimately contested by local people who can demonstrate that they have legal, customary, or user rights.			
4.8.1	Where there are or have been disputes, proof of legal acquisition of title and evidence that mutually agreed compensation has been made to all people who held legal, customary, or user rights at the time of acquisition is available and provided to parties to a dispute, and that any compensation was accepted following a documented process of FPIC. - Minor compliance -	Land has been leased by the Government of Gabon to Olam. No acquisition of any land. i. Lot 2: From FPIC process done, all crop compensation was completed from 2013 (All affected village) and 2017 (for Bemboudié village). SEAI was done in in participatory method. Land user rights was determined. ii. Lot 3:	Complied

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		<p>From FPIC process done, all crop compensation was completed from 2015 for Lot 3 and January 2017 for Lot 3 extension.</p> <p>SEAI was done in participatory method. Land user rights was determined. At lot 3 extension, final public consultation during the SEAI was done on 16<sup>th</sup> December 2016 with the presence of local authorities, village chiefs and representative person, Olam management team. Total of 26 persons were present.</p> <p>iii. Lot 1:</p> <p>SEAI was done in participatory method. Land user rights was determined. At lot 1, final public consultation during the SEAI was done on 09<sup>th</sup> March 2012 with the presence of local authorities, village chiefs and representative person, Olam management team. Total of 28 persons were present.</p>	
4.8.2	<p><b>(C)</b> Land conflict is not present in the area of the unit of certification. Where land conflict exists, acceptable conflict resolution processes (see Criteria 4.2 and 4.6) are implemented and accepted by the parties involved. In the case of newly acquired plantations, the unit of certification addresses any unresolved conflict through appropriate conflict resolution mechanisms.</p> <p>- Critical (Major) compliance -</p>	<p>Olam has a procedure for land conflict resolution named "Procedure de resolution des conflits fonciers" ref SOP N°11/CRS-CF (0)/0120 Revision 00 of 15<sup>th</sup> January 2020.</p> <p>All conflict will be handled as a complaint and resolution will be register in SOCPROG system. At the moment of audit, no complaint in case of land conflict was recorded.</p>	Complied
4.8.3	<p>Where there is evidence of acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations and there remain parties with demonstrable customary and land use rights, these claims will be settled using the relevant requirements (Indicators 4.4.2, 4.4.3 and 4.4.4).</p> <p>- Minor compliance -</p>	<p>At the moment of audit, no complaint in case of land conflict was recorded.</p>	Complied

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4.8.4	For any conflict or dispute over the land, the extent of the disputed area is mapped out in a participatory way with involvement of affected parties (including neighbouring communities where applicable). - Minor compliance -	At the moment of audit, no complaint in case of land conflict was recorded. However, Olam has a procedure for land conflict resolution named "Procédure de résolution des conflits fonciers" ref SOP N°11/CRS-CF (0)/0120 Revision 00 of 15 <sup>th</sup> January 2020.	Complied
<b>Principle 5: Support smallholder inclusion</b>			
<b>Criterion 5.1:</b> The unit of certification deals fairly and transparently with all smallholders (Independent and Scheme) and other local businesses.			
5.1.1	Current and previous period prices paid for FFB are publicly available and accessible by smallholders. - Minor compliance -	Not Applicable as there are no smallholder in OPG supply base.	Not Applicable
5.1.2	<b>(C)</b> Evidence is available that the unit of certification regularly explains the FFB pricing to smallholders. - Critical (Major) compliance -	Not Applicable as there are no smallholder in OPG supply base.	Not Applicable
5.1.3	<b>(C)</b> Fair pricing, including premium pricing, when applicable, is agreed with smallholders in the supply base and documented - Critical (Major) compliance -	Not Applicable as there are no smallholder in OPG supply base.	Not Applicable
5.1.4	<b>(C)</b> Evidence is available that all parties, including women and independent representative organisations assisting smallholders where requested, are involved in decision-making processes and understand the contracts. These include those involving finance, loans/credits, and repayments through FFB price reductions for replanting and/or other support mechanisms where applicable. - Critical (Major) compliance -	Not Applicable as there are no smallholder in OPG supply base.	Not Applicable
5.1.5	Contracts are fair, legal and transparent and have an agreed timeframe. - Minor compliance -	Not Applicable as there are no smallholder in OPG supply base.	Not Applicable

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5.1.6	<b>(C)</b> Agreed payments are made in a timely manner and receipts specifying price, weight, deductions and amount paid are given. - Critical (Major) compliance -	Not Applicable as there are no smallholder in OPG supply base.	Not Applicable
5.1.7	Weighing equipment is verified by an independent third party on a regular basis (this can be government). - Minor compliance -	Not Applicable as there are no smallholder in OPG supply base.	Not Applicable
5.1.8	The unit of certification supports Independent Smallholders with certification, where applicable, ensuring mutual agreements between the unit of certification and the smallholders on who runs the internal control system (ICS), who holds the certificates, and who holds and sells the certified material. - Minor compliance -	Not Applicable as there are no smallholder in OPG supply base.	Not Applicable
5.1.9	<b>(C)</b> The unit of certification has a grievance mechanism for smallholders and all grievances raised are dealt with in a timely manner. - Critical (Major) compliance -	Not Applicable as there are no smallholder in OPG supply base.	Not Applicable
<b>Criterion 5.2:</b> The unit of certification supports improved livelihoods of smallholders and their inclusion in sustainable palm oil value chains.			
5.2.1	The unit of certification consults with interested smallholders (irrespective of type) including women or other partners in their supply base to assess their needs for support to improve their livelihoods and their interest in RSPO certification. - Minor compliance -	Not Applicable as there are no smallholder in OPG supply base.	Not Applicable
5.2.2	The unit of certification develops and implements livelihood improvement programmes, including at least capacity building to enhance productivity, quality, organisational and managerial competencies, and specific	Not Applicable as there are no smallholder in OPG supply base.	Not Applicable

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	<p>elements of RSPO certification (including the RSPO Standard for Independent Smallholder).</p> <p><b>PROCEDURAL NOTE:</b> The RSPO just developed a separate standard for Independent Smallholders and the Gabon NIWG decided to make it applicable for all Independent Smallholders in Gabon (see Annex 6).</p> <p>- Minor compliance -</p>		
5.2.3	<p>Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production.</p> <p>- Minor compliance -</p>	Not Applicable as there are no smallholder in OPG supply base.	Not Applicable
5.2.4	<p><b>(C)</b> Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling.</p> <p>- Critical (Major) compliance -</p>	Not Applicable as there are no smallholder in OPG supply base.	Not Applicable
5.2.5	<p>The unit of certification regularly reviews and publicly reports on the progress of the smallholder support programme.</p> <p>- Minor compliance -</p>	Not Applicable as there are no smallholder in OPG supply base.	Not Applicable
<b>Principle 6: Respect workers' rights and conditions</b>			
<b>Criterion 6.1:</b> Any form of discrimination is prohibited.			
6.1.1	<p><b>(C)</b> A publicly available non-discrimination and equal opportunity policy is implemented in such a way to prevent discrimination based on ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or the age legally authorized at the national level.</p> <p>- Critical (Major) compliance -</p>	<p>Olam Palm Gabon's Code of Conduct (The Olam Code of Conduct, of February 2016) where the provides equal employment opportunities to all without regard to an individual's race, colour, religion, sex, age, national origin, sexual orientation, disability, citizenship status, or marital status.</p> <p>Additionally, the Company's fair employment policy (Olam Fair Employment Policy, of September 2018) guarantees a fair and non-</p>	Complied

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		discriminatory workplace that provides equal opportunity to everyone. Interviews with workers showed that these policies are explained to them at induction.	
6.1.2	<b>(C)</b> Evidence is provided that workers and groups including local communities, women, and migrant workers have not been discriminated against. Evidence includes migrant workers' non- payment of recruitment fees. - Critical (Major) compliance -	Olam's labour force constitutes of nationals and migrant workers. Interviews with both nations (including women and local communities) as well as migrant workers showed that they were not discriminated during recruitment and in the course of work. They receive equal pay for equal work done. Meanwhile, interviews with migrant workers revealed that no recruitment fees were paid.	Complied
6.1.3	The unit of certification demonstrates that recruitment selection, hiring, access to training and promotion are based on skills, capabilities, qualities and medical fitness necessary for the jobs available. - Minor compliance -	At Olam, the recruitment process is based on skills and capabilities of candidates, as evidenced by verification of the Assessment Checklist for Candidate and New Employee Evaluation for local workers. For recruitment of foreign workers, Olam has developed a Foreign Workers' Recruitment Policy which establishes the framework within which foreign workers are recruited.	Complied
6.1.4	Pregnancy testing is not conducted as a discriminatory measure and is only permissible when it is legally mandated. Alternative equivalent employment is offered for pregnant women. - Minor compliance -	Interviews with women, human resources and gender committee confirmed that pregnancy tests are carried out as a means to protecting potentially pregnant women from being assigned hazardous work, especially handling of chemicals. Pregnancy tests are not used to discriminate women in any form.	Complied
6.1.5	<b>(C)</b> A gender committee is in place specifically to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women. - Critical (Major) compliance -	A gender committee is in place in Lots 1,2 and 3 to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women.	Complied

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		Meetings with gender committees of the different Lots revealed that they understand their roles. Additionally, minutes of meetings of gender committees were seen at the time of the audit.	
6.1.6	<p>There is evidence of equal pay for the same work scope and provision of similar necessary working tools.</p> <p><b>PROCEDURAL NOTE:</b> The verification is based on the sectoral collective agreement or, failing that, a company-wide agreement, or any other document recognized by the administration which clearly stipulates the applicable salary bases.</p> <p>- Minor compliance -</p>	<p>Olam Mouila has signed a Company-wide agreement (Accord d'établissement) of 08/02/2017 with workers' unions and endorsed by the Labour Inspectorate. The company-wide agreement sets out conditions of work and pay. Article 17.1 of the agreement clearly states that salaries are based on the work post, worker's aptitude and their experience.</p> <p>Additionally, comparison of workers' payslips confirmed that workers are paid equally for same work scope.</p>	Complied
<b>Criterion 6.2:</b> Pay and conditions for staff and workers and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages (DLW).			
6.2.1	<p><b>(C)</b> Applicable labour laws, union and/or other collective agreements and documentation of pay (Salary grid published, same salary for the same position) and conditions are available to the workers in national languages and explained to them in a language they understand.</p> <p><b>PROCEDURAL NOTE:</b> The verification is based on the sectoral collective agreement or, failing that, a company-wide agreement, or any other document recognized by the administration which clearly stipulates the applicable salary bases.</p> <p>- Critical (Major) compliance -</p>	<p>Olam Mouila has signed a Company-wide agreement (Accord d'établissement) of 08/02/2017 with workers' unions and endorsed by the Labour Inspectorate. The company-wide agreement sets out conditions of work and pay.</p> <p>This document alongside others pertaining to labour laws (Labour Code) are available in French which is the national language of Gabon and explained to workers in languages they understand (e.g. English and Spanish).</p>	Complied
6.2.2	<p><b>(C)</b> Employment contracts and related documents detailing payments and conditions of employment (e.g. regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. in compliance with national legal</p>	<p>The Company-wide agreement establishes the condition of work and pay including but not limited to regular working hours,</p>	Complied



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	<p>requirements) and payroll documents give accurate information on compensation for all work performed, including work done by family members.</p> <p>- Critical (Major) compliance -</p>	<p>deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc.</p> <p>Meanwhile, all workers have signed an employment contract and payslips are issued for all workers every month as proof of payment of salaries.</p> <p>Payslips clearly detail (effective number of hours worked, deductions, and overtime).</p> <p>Interviews conducted with workers revealed that they understood the purpose of the deductions (e.g. CNSS, CNAMGS).</p>	
6.2.3	<p><b>(C)</b> There is evidence of legal compliance for regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice and other legal labour requirements.</p> <p>- Critical (Major) compliance -</p>	<p>Daily attendance is done by scanning at the biometric centre at the main office. Additionally, supervisors record overtime, rainy days, etc. in the Supervisor’s Daily Record (SDR). Payslips reviewed confirmed that workers have been paid following the Collective Agreement. Interviews with the workers equally confirmed that they are entitled to holiday and maternity leave, in respect of Gabon’s Labour Code (Code du Travail 1994).</p>	Complied
6.2.4	<p><b>(C)</b> The unit of certification provides adequate housing, sanitation facilities, drinking water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. National laws, or in their absence the ILO Guidance on Workers’ Housing Recommendation No. 115, are used. In the case of acquisitions of non-certified units, a plan is developed detailing the upgrade of infrastructure. A reasonable time (5 years) is allowed to upgrade the infrastructure.</p> <p>- Critical (Major) compliance -</p>	<p>The unit of certification provides housing facilities for its workers distributed across several camps (Mbadi, Mbokou, PK19).</p> <p>The Company-wide agreement (accord d’établissement, in Article 22.2.1 (a)) provides that workers who live with their families (i.e. spouse/partner and children) in the housing on the plantation will have a standard housing unit of 2 rooms.</p> <p>However, this provision is not respected by Olam in the attribution of housing units. We found out that in Mbokou, the first Housing Block right after the Clinic (i.e. directly next to where trucks, tractors and other vehicles are parked) in the 4<sup>th</sup> apartment, two families (Ibinga Lionel: with wife and 2 children) and (Hans: with wife and 3 children) share the same apartment. This is same with the 3<sup>rd</sup></p>	Non-compliance

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		<p>Housing Block from the clinic, where in apartment 7, Mbembo Nestor (with wife and 1 kid) share an apartment with Moutoutou who is single. Mbembo actually has 3 kids but only brought one kid to the housing unit because only a single room was attributed to him.</p> <p>Similarly, in Mbadi we found that apartment S1 houses 7 persons (from J Stephane Sercices – sub-contractor) and apartment S4 houses 9 persons (from Ngounie Transport Sercice – sub-contractors).</p> <p>Additionally, water supply in some lodging facilities is an issue (Baghdad quarters in Mboukou). Same is the case with Blocks in Mbadi Housing Facility, where several blocks including P, Q, T, U, V, P do not regularly have water. Meanwhile in Mandji, the Block that houses the Kindergarten and the Block directly behind this one do not have constant water supply.</p>	
6.2.5	<p>The unit of certification makes efforts to improve workers’ access to adequate, sufficient and affordable food.</p> <p>- Minor compliance -</p>	<p>Across the unit of certification, agreements have been reached with different individuals who operate provision stores.</p> <p>Additionally, Olam vehicles are available to transport workers to town (Mouila) three times every week (Wednesdays, Saturdays and Sundays) for provisions they can’t readily get on the plantation.</p> <p>However, this does not apply to sub-contractor workers as they have to find their own means of transportation to get to town.</p>	OFI
6.2.6	<p>A DLW is paid to all workers, including those on piece rate/quotas, for whom the calculation is based on achievable quotas during regular work hours.</p> <p><b>PROCEDURAL NOTE:</b></p>	<p>Prevailing wages calculation is done following RSPO guidelines. Olam provides a number of benefits to workers including housing (housing allowance for workers who are not lodged in Olam housing units), electricity, water supply, medical expenses, school expenses for workers’ children.</p>	Complied

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<p><b>STATEMENT FROM THE RSPO STANDARDS STANDING COMMITTEE REGARDING INDICATOR 6.2.6 ON DECENT LIVING WAGE (Endorsed by the RSPO BoG on 7th November 2019)</b></p> <p>With reference to procedural note of indicator 6.2.6, the RSPO has published a guidance on the DLW calculation in June 2019. The RSPO Secretariat will endeavour to carry out DLW country benchmarks for palm oil producing countries in which RSPO members operate and for which no Global Living Wage Coalition (GLWC) benchmarks exist<sup>1</sup></p> <p><b><i>Where a GLWC living wage standard (benchmark), or one that fulfils the basic requirements of the RSPO- endorsed living wage methodology, has been established in the country or region of operation, the same should be used as benchmarks.</i></b></p> <p>In the absence of such benchmarks, the RSPO will collaborate with the GLWC and/or local experts on developing oil palm industry benchmarks<sup>2</sup>. These benchmarks will be developed in collaboration and consultation with relevant stakeholders such as palm oil industry members, workers’ union, authorities and/or relevant organisations.</p> <p><b><i>For countries where no living wage standard is established, until such time that an RSPO endorsed benchmark for the country is in place, national minimum wages shall be paid to all workers. In addition to the payment of minimum wages, the Unit of Certification (UoC) shall conduct an assessment of the prevailing wages and in-kind benefits provided to workers in the Unit of Certification aligned with the RSPO Guidance for Implementing a Decent Living Wage<sup>3</sup>.</i></b></p> <p>The Gabon NIWG will, on their side, start identifying the existent national statistics necessary for the calculations as stipulated in the new RSPO-endorsed living wage methodology.</p> <p>Once these benchmarks are available, this procedural note is no longer applicable. UoC shall have an implementation plan towards the payment of a DLW with specific targets, and a phased implementation process including:</p> <ul style="list-style-type: none"> <li>• Updated assessment on prevailing wages and in-kind benefits</li> <li>• There is annual progress on the implementation of living wages</li> <li>• Where a minimum wage, based on equivalent of baskets of goods, is stipulated in Collective Bargaining Agreements (CBAs), this should be used as the foundation for the gradual implementation of the living wage payment</li> </ul>	<p>Prevailing wages are calculated for national workers, foreign workers living in Olam housing units, and workers who do not live in Olam housing units. The benefits mentioned above make up part of the prevailing wages.</p>	

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	<ul style="list-style-type: none"> <li>The UoC may choose to implement the living wage payment in a specific section as a pilot project; the pilot will then be evaluated and adapted before eventual scale up of the living wage implementation.</li> </ul> <p>- Minor compliance -</p>		
6.2.7	<p>Permanent, full-time employment including contractors' workers and contracted workers is used for all core work performed by the unit of certification. Casual, temporary and day labour is limited to jobs that are temporary or seasonal.</p> <p>- Minor compliance -</p>	Document reviewed confirmed that all core work was carried out by permanent, full-time employment.	Complied
<p><b>Criterion 6.3:</b> The unit of Certification respects the rights of all personnel to form and join trade unions of their choice and to bargain collectively. Where the right to freedom of association and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all such personnel.</p>			
6.3.1	<p><b>(C)</b> A published statement recognising freedom of association and right to collective bargaining in national languages is available and is explained to all workers in languages that they understand, and is demonstrably implemented. The official language is the language which is recognized as such in the constitution and / or the laws of the country concerned. It is the language used in government and public services.</p> <p>- Critical (Major) compliance -</p>	<p>Olam Palm Gabon has established Human Rights Policy dated 01/09/2019, in which the Company clearly endorses and promotes freedom of association and collective bargaining. Workers reserve the right to join associations of their choice and to bargain collectively.</p> <p>Meanwhile, management shall develop alternate internal processes for collaborating with workers in managing workplace affairs such as Joint Consultative Council if the right to freedom of association is restricted under law. The policy is in bilingual, English and French and it is communicated to the workers during induction. There was evidence that management has implemented the policy by respecting the rights of workers to have freedom of association. A worker's union exists and Delegates were elected transparently by the workers.</p>	Complied

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6.3.2	<p>Minutes of meetings between the unit of certification with trade unions or workers representatives, who are freely elected, are documented in national languages and made available upon request.</p> <p>- Minor compliance -</p>	<p>Workers’ representatives were freely elected by their peers for a period of 3 years in 2015 and re-elected in 2017 for a second term (election held on 29/09/20197).</p> <p>There exists an annual calendar of meetings, which is shared with human resources.</p> <p>Three meetings are held every month (the first 2 among delegates and the third meeting is between delegates and human resources).</p> <p>Minutes of meetings were available at the time of the audit</p>	Complied
6.3.3	<p>Management does not interfere with the formation or operation of registered unions/ labour organisations or associations, or other freely elected representatives for all workers including migrant and contract workers.</p> <p>- Minor compliance -</p>	<p>There was no evidence suggesting management interference in the formation or operations of registered unions, labour organisations, or other freely elected representatives for all workers including migrant and contract workers.</p> <p>Interviews with workers and delegates confirm that elections of delegates was free and fair, and only among workers with no management interference.</p>	Complied
<b>Criterion 6.4: Children are not employed or exploited.</b>			
6.4.1	<p>A formal policy for the protection of children, including prohibition of child labour and remediation is in place, and included into service contracts and supplier agreements.</p> <p>- Minor compliance -</p>	<p>Olam Palm Gabon has developed a Human Rights Policy, of 01/09/2019 which firmly prohibits the use of child labour or forced labour, either directly or through a subcontractor. According to this policy, the minimum age for admission to any type of employment shall not be less than 18 years.</p> <p>Additionally, Olam’s Code of Conduct and Fair Employment Policy of September 2018 sets the minimum age required by law for a person to work at not be less than 18 years.</p> <p>Moreover, Olam’s Supplier Code equally prescribes that suppliers shall also comply with International Labour Organization (ILO)</p>	Complied

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		Convention 138 on the Minimum Age of Employment and Convention 182 on the Worst Forms of Child Labour. Interviews with workers and field observations equally confirmed that there is no child labour.	
6.4.2	<b>(C)</b> There is evidence that minimum age requirements are met. Personnel files show that all workers are above the national minimum age or above company policy minimum age, whichever is higher. There is a documented age screening verification procedure that is to say, provision of a national identity document for the national worker officially recognized at national level and a residence permit (CDS - Carte de séjour in French) for the foreign worker which is the subject of documentation. - Critical (Major) compliance -	Olam has put in place a screening process to check age before any recruitment is done. The screening process includes check of birth certificate and an official identification (residence permit for foreigners). This policy is enshrined in Olam’s recruitment policy (Procédure de Recrutement; No.: 2708/2016RH/JB, Ver. 1 of 27/8/2016), which clearly stipulates that when invited to an interview, the applicant must come along with a certified copy of their birth certificate and their national identification card (residence permit for foreigners).	Complied
6.4.3	<b>(C)</b> Young workers (between 16 and 18 years old) are not employed in RSPO certified companies in Gabon. The minimum age is 18 years old. - Critical (Major) compliance -	Based on Olam policies previously mentioned, minimum age for recruitment is set at 18 years. There was no evidence to suggest that workers below 18 years were employed by Olam.	Complied
6.4.4	The unit of certification demonstrates communication about its ‘no child labour’ policy and the negative effects of child labour, and promotes child protection to supervisors and other key staff, smallholders, FFB suppliers and communities where workers live. - Minor compliance -	Olam’s employment policies previously mentioned have clause that prohibits child labour. Olam has socialized it’s no child labour with all stakeholders including workers and sub-contractor workers. Additionally, Olam interviews with stakeholders confirmed that they have been explained and understand Olam’s no child labour policy. As a consequence, there was no evidence to suggest the use of child labour by the unit of certification.	Complied
<b>Criterion 6.5:</b> There is no harassment or abuse in the workplace, and reproductive rights are protected.			
6.5.1	<b>(C)</b> A policy to prevent sexual and all other forms of harassment and violence is implemented and communicated to all levels of the workforce.	Olam has developed a policy to prevent sexual and other form of harassment (Procédure de Lutte Contre le Harcelement Sexuel et	Complied

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	- Critical (Major) compliance -	<p>la discrimination en milieu professionnel, of 01/01/2018 (Document Number : SOP 1) which equally establishes a Gender Committee. The procedure sets the framework for documenting all cases of harassment and discrimination via the use of different forms (Convocation Form (fiche de convocation), Investigation Form (formulaire d'enquete). A confidentiality charter is signed by all members of the gender committee to maintain anonymity of the process.</p> <p>Interviews with members of the gender committee, workers' unions showed that that procedure is implemented and communicated to all levels of the workforce.</p>	
6.5.2	<p><b>(C)</b> A policy to protect the reproductive rights of all, especially of women, is implemented and communicated to all levels of the workforce.</p> <p>- Critical (Major) compliance -</p>	<p>Olam's Human Rights Policy of 01/09/2019 sets the framework for the protection of reproductive rights, especially those of women.</p> <p>Additionally, reproductive rights are protected as enshrined in Articles 170 -175 of the Labour Code of the republic of Gabon.</p>	Complied
6.5.3	<p>Management has assessed the needs of new mothers, in consultation with the new mothers, and actions are taken to address the needs that have been identified.</p> <p>- Minor compliance -</p>	<p>Gabon's Labour Code of 1994 provides for rest periods for breastfeeding mothers. Specifically, article 174 of the Code stipulates that new mothers have the right to rest periods for breastfeeding amounting to 12 months; with 2 hours daily for the first six months and 1 hour daily for the following sick months.</p> <p>Additionally, in Olam's Human Resources Guidelines, section C1 on Pregnancy and Maternity, rest for breastfeeding in respect of national regulations is specifically mentioned.</p> <p>Interviews with female workers and the gender committee confirmed that women can accumulate breastfeeding hours over the week and take a day off work (Friday and Saturday) in the first</p>	Complied

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		six months or Saturday in the second half of the breastfeeding period.	
6.5.4	<p>A grievance mechanism, which respects anonymity and protects complainants where requested, is established, implemented and communicated to all levels of the workforce.</p> <p>- Minor compliance -</p>	<p>A Procedure for management of conflicts is in place (Procédure de Gestion des Plaintes et Reclamation); reference SOP No.7/CRS-GP (7)/0120 of 23/12/2019. Annex 1 of this procedure constitutes a grievance form for reporting all complaints, both internal and external.</p> <p>The grievance procedures are open to all affected parties and provide access to resolution of grievances in a timely manner. Additionally, the grievance mechanism respects anonymity of complainants when requested.</p> <p>Interviews with different internal stakeholders (workers' unions, gender committee, etc.) confirmed that the grievance mechanism is implemented and communicated to all levels of the workforce.</p>	Complied
<b>Criterion 6.6:</b> No forms of forced or trafficked labour are used.			
6.6.1	<p><b>(C)</b> All work is voluntary and the following are prohibited:</p> <ul style="list-style-type: none"> <li>• Retention of identity documents or passports</li> <li>• Payment of recruitment fees Contract substitution Involuntary overtime.</li> <li>• Lack of freedom of workers to resign</li> <li>• Penalty for termination of employment</li> <li>• Debt bondage</li> <li>• Withholding of wages</li> </ul> <p>- Critical (Major) compliance -</p>	<p>Olam has established a procedure for the recruitment of migrant workers (Procédure Interne de Recrutement des Travailleurs Etrangers, reference: 001/03/2016/RH/GT, of March 2016). Whereas interviews with Indonesian Migrant workers (IFW) confirms that they do not pay any recruitment fees, their passport are retained by Olam.</p> <p>However, no real proof of consent was provided at the time of the audit. HR provided a list of just two IFWs (name, date of birth, Olam number, passport number and signature), it therefore remains unclear whether the IFWs actually gave their consent for the retention of their passports. The date on which the IFW handed the passport is not indicated on the list. HR explained that passports</p>	Non-compliance



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		are handed to Olam when Olam hands the residence permit (CDS) to the IFW.	
6.6.2	<p><b>(C)</b> Where temporary or migrant workers are employed, a specific labour policy and procedures are established and implemented.</p> <p>- Critical (Major) compliance -</p>	<p>Olam has established a procedure for the recruitment of migrant workers (Procédure Interne de Recrutement des Travailleurs Etrangers, reference: 001/03/2016/RH/GT, of March 2016). This procedure clearly describes the process to be followed when recruiting expatriate workers. The steps include: employment proposal to candidate, acceptance of the offer, request for documents for submission of application for a work permit, right up to the acquisition of a residence permit for the migrant worker.</p> <p>Interviews with foreign workers revealed that this procedure is implemented.</p>	Complied
<b>Criterion 6.7:</b> The unit of certification ensures that the working environment under its control is safe and without undue risk to health.			
6.7.1	<p><b>(C)</b> The responsible person(s) for H&amp;S is identified. There are records of regular meetings between the responsible person(s) and workers. Concerns of all parties about health, safety and welfare are discussed at these meetings, and any issues raised are recorded.</p> <p>- Critical (Major) compliance -</p>	<p>OPG Mouila Bilala has identified responsible persons for H&amp;S in all of its operational areas. The Sustainability Development Manager is the person identify and response for H&amp;S for lot 1 and 2 while EHS the manager has been identified for Lot 3. The H&amp;S team have regular meeting with workers in the form trainings and awareness. Annual schedule captioned Awareness campaign, induction and training for Health and Safety 2020 was sighted. The program is broken into months (January to December). H&amp;S Meetings conducted from January to November 2020 was sighted.</p> <p>Sample sighted include;</p> <ul style="list-style-type: none"> <li>i. Manipulation and use of chemical with pesticide applicators – 02/11/2020 and 21/10/2020 – Lot3 Estate 14, block T8b and T100</li> </ul>	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		<ul style="list-style-type: none"> <li>ii. Safety awareness on the use of the chisel with harvesters – 16/03/2020 and 21/10/2020 – Lot3 Estate 13, block D2/D1</li> <li>iii. PPE use awareness with workshop staff – 17/11/2020</li> <li>iv. Awareness meeting with waste collectors on chemical products (PPE use, security rules, safety practices, preventive measures, comportment at work, cleaning condition and inspection of work location – 25/08/2020 – at Lot2 Landfill</li> <li>v. Awareness on security rules, preventives measures on speed limit, seat belt usage and lighting – 13/11/2020 for Drives at Lot2 estate 9.</li> <li>vi. Awareness for sub-contractors workers – covering risk at work, security rules, accident prevention, fire prevention QHSE policies and waste management – 14 to 18/09/2020 at Lot2 muster point.</li> <li>vii. Spraying risk awareness meeting with pesticides applicators in estate 6 block K28 – 19/11/2020</li> </ul>	
6.7.2	<p>Accident and emergency procedures are in place and instructions are clearly understood by all workers. Accident procedures are available in the appropriate language of the workforce. Assigned operatives trained in first aid are present in both field and other operations, and first aid equipment is available at worksites. Records of all accidents are kept and periodically reviewed.</p> <p>- Minor compliance -</p>	<p>Accident and emergency procedures are in place and covers fire, spillage and general accident. Sighted include;</p> <ol style="list-style-type: none"> <li>1. Repose D'urgence En Cas D'Accident (<i>Emergency in case of accident</i>) – document reference OPG-MLA-EHS-SOP-16 dated 28/10/2017.</li> <li>2. Response D'urgence Pour Carburant &amp; Lubrifiants (<i>Emergency Response for Fuel &amp; Lubricants</i>)- document reference OPG-MLA-EHS-SOP-06 dated 01/10/2017.</li> <li>3. Fire management plan – document referenced DS-PRP.01 dated 05/05/2017</li> </ol>	Non-compliance

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	<p>Subsequently, OPG has trained workers regarding its accident and emergency procedure. For instance, awareness training conducted for store keepers and fuel attendance on 28/10/2020 were sighted. The training covered use of PPE, storage of pesticide, safety measures at fuel station, attitude to adopt in case of contamination, the use of the fire extinguisher in case of fire. Similarly fire training conducted on 16/07/2020 for workshop team and 16/11/2020 for fuel station attendance were sighted</p> <p>Additionally there are emergency numbers posted around to be contacted in the event of accident. For instance in the event of fire, emergency number to call is 06200089 and in the event of general accident that need medics, 062004583/06200983 is to be called.</p> <p>Furthermore, OPG has conducted first aid training for CDQs (Gang leaders) to facilitate first aid in the field. Training conducted with pictorial evidence on August 28, 2020, August 29, 2020 and November, 2020 were sighted. The training covered all CDQs in Lot3, estate 13 and 14 as well as some reps from the workshop. Additionally records of first aid boxes supplied to estate 13 and 14 were sighted. In total 39 first boxes have been supplied on 26/11/2020. Lot2, training was conducted on 13 to 18 August 2020 and also on 24/11/2020. In all 49 CDQs trained as first aiders with 52 first distributed. Also in Lot1 training was conducted from 10-12 August 2020. 11 first aiders trained in estate 6 with 11 first aid boxes supplied.</p> <p>OPG records all accident electronically (MS excel data) captioned EH&amp;S Incident Tracker OPG Mouila Plantation and manually on paper (declaration accident/incident). All accident records shows; site of incident, accident location, month, name of victim, function of the victim, position at the time of accident, classification of</p>	

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Criterion / Indicator		Assessment Findings	Compliance
		<p>accident, description of accident, date of accident, accident report date, number of days lost, root cause, proposed corrective action, person responsible, target date of completion of action plan and remarks (LTA, FAC, MTC, RWC). Review of EH&amp;S Incident Tracker OPG Mouila Plantation showed evidence of all accident recorded from January 2020 till date.</p> <p>However, some accident records sighted were not fully completed with their immediate causes and action. Sample include accident on employees with employment number; 1. 029410 – 18/06/2020, 021654-02/04/2020, 037114-01/04/2020, 015808-01/04/2020, 047262-26/05/2020, 035234-27/05/2020, 015553-29/05/2020</p> <p>Furthermore, OPG has distributed first aid kits to trained first aiders, however a visit to estate 14 block V103 found first aid box used by the spraying team virtually empty.</p>	
6.7.3	<p><b>(C)</b> Workers use appropriate personal protective equipment (PPE), which is provided free of charge to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, land preparation, and harvesting. Sanitation facilities for those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing.</p> <p>- Critical (Major) compliance -</p>	<p>OPG provide PPEs for its staff at no cost. Interview with sprayers in estate 9 block O10/O11, estate 6 block K30 and estate 14 block V103 established compliance. PPEs supplied include; spraying uniform, boots, gloves, helmet, respirators with cartridges etc. Review of the PPEs issue file for Lots1 (estate 6), Lot2 (estate 7 and 9), and Lot3 (estate 13 and 14) established compliance of PPEs supplied from January till date. There are also sanitation facilities at all sites were workers change out into their PPE before work, wash and put on their personal clothing after work. The facilities were found to be used by the workers as it was evident in Lot 3 (workers were found using the facility after work). However, in estate 9 block O11, 2 respirator cartridges used by sprayers were found to be expired since November 2019. Similar was found was in estate 6 block K30.</p>	Non-compliance
6.7.4	<p>All workers are provided with medical care and covered by accident insurance. Costs incurred from work-related incidents leading to injury or</p>	<p>All work related accident are covered by insurance. According to the labour law of Gabon (<i>Law No. 3/94 of 21 November 1994</i>) as amended</p>	Complied

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<p>sickness are covered in accordance with national law or by the unit of certification where national law does not offer protection.</p> <p>- Minor compliance -</p>	<p>by Act No. 12/2000 of 12 October 2000 relating to health and safety at work (art. 197) and the Social Security Code) all workers are supposed to be registered with the National Social Security Fund (CNSS). Review of employee file saw evidence of compliance. For all work related accident the company declare to the CNSS who then reimburse the company for all medical expenses incurred on the injured worker. Prior to that the company doctor send accident investigation to the HR team, then a declaration is made to the CNSS by the company. CNSS acknowledges the declaration before any payment of medical insurance can be made. Evidence seen include;</p> <ol style="list-style-type: none"> <li>1. Miaka Marie – 16/10/2020 Type of accident – Palm thorn sting</li> <li>2. Malandou Venessa – 23/10/2020 Type of accident – Wound form kitchen knife</li> <li>3. Madelet Mondende Leadre – 10/10/2020 – Type of accident - Palm thorn sting</li> <li>4. Bitango Brenda – 06/06/2020 – Type of accident – Machete wound</li> <li>5. Komba Bridgitte – 05/06/2020 – Type of accident - Machete wound</li> </ol> <p>Interview with workers in Lot2 estate 09 block O10 and O11. Lot3 estate 14 block V103 and Lot1 estate 6 block K30 established that all costs incurred from work-related incidents are borne by the company.</p> <p>Follow-up with payroll (SAGE X3) also found evidence of sick leave paid to these workers for all medical leave granted.</p>	
<p>6.7.5 Occupational injuries are recorded using Lost Time Accident (LTA).</p>	<p>All are accident are recorded using the lost time accident (LTA) metrics captioned Plantations HSE Lagging Key Safety Indicators.</p>	<p>Complied</p>

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Criterion / Indicator		Assessment Findings	Compliance																		
	- Minor compliance -																				
<b>Principle 7: Protect, conserve and enhance ecosystems and the environment</b>																					
<b>Criterion 7.1:</b> Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management (IPM) techniques.																					
7.1.1	<p><b>(C)</b> IPM plans are implemented and monitored to ensure effective pest control.</p> <p>- Critical (Major) compliance -</p>	<p>Guidelines were established under OPG Agriculture policy Manual Volume 1 and 2 – Chapter 15.</p> <p>i. Lot 2:</p> <ul style="list-style-type: none"> <li>- No issue except elephant</li> </ul> <p>Pest and diseases: Main elephant damage</p> <p>Measures taken were: Elephant tranche and Sensor</p> <p>Refresh training done on 22<sup>nd</sup> September 2020 with 17 people at Bloc K11.</p> <table border="1"> <thead> <tr> <th>Estate</th> <th>Length/plot/distance</th> <th>Remarks</th> </tr> </thead> <tbody> <tr> <td>7</td> <td>172 plots</td> <td rowspan="3">5 to 10 meters between 2 plots 20 – 25 ha in each bloc. 160 trees/ha in savannah 143 trees/ha in forest</td> </tr> <tr> <td>8</td> <td>121 plots</td> </tr> <tr> <td>9</td> <td>155 plots</td> </tr> </tbody> </table> <p>Pest and disease mitigation plan:</p> <table border="1"> <thead> <tr> <th>Estate</th> <th>Major pest and disease</th> <th>Mitigation and progress</th> </tr> </thead> <tbody> <tr> <td>7</td> <td rowspan="3">Elephant intrusion</td> <td rowspan="3">N° sensors: 7: 127 8: 121 9: 155</td> </tr> <tr> <td>8</td> </tr> <tr> <td>9</td> </tr> </tbody> </table>	Estate	Length/plot/distance	Remarks	7	172 plots	5 to 10 meters between 2 plots 20 – 25 ha in each bloc. 160 trees/ha in savannah 143 trees/ha in forest	8	121 plots	9	155 plots	Estate	Major pest and disease	Mitigation and progress	7	Elephant intrusion	N° sensors: 7: 127 8: 121 9: 155	8	9	Complied
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Criterion / Indicator		Assessment Findings		Compliance														
			<p>Total damage: 45.43 ha affected from January to October 2020. In 2019, 183, 2 ha was damaged.</p> <p>ii. Lot 3 Pest and diseases were: Rhychophorus attack, Elephant and rodents. Measures taken:</p> <ul style="list-style-type: none"> <li>- Trench; Barbed net and Patrol (Elephant)</li> <li>- Trap and removing (Rhychophorus)</li> <li>- Round around the palm tree (Rodents)</li> </ul> <p>Refresh training done on 04<sup>th</sup> September 2020 with 17 people at Bloc M50 / M51 at Lot 3A estate 10 to 13 (3 participants). In Lot 3B estate 14 – 15 Block V97 on 05<sup>th</sup> September 2020 (15 participants)</p> <table border="1"> <thead> <tr> <th>Estate</th> <th>Length/plot/distance</th> <th>Remarks</th> </tr> </thead> <tbody> <tr> <td>13</td> <td>127 plots</td> <td rowspan="2">7.4 meters between 2 plots 30 ha in each plot. 160 trees/ha in savannah</td> </tr> <tr> <td>14</td> <td>125 plots</td> </tr> </tbody> </table> <p>Pest and disease mitigation plan:</p> <table border="1"> <thead> <tr> <th>Estate</th> <th>Major pest and disease</th> <th>Mitigation and progress</th> </tr> </thead> <tbody> <tr> <td>13</td> <td>Elephant intrusion</td> <td>Trench: 32,482 km Traps: 5</td> </tr> </tbody> </table>	Estate	Length/plot/distance	Remarks	13	127 plots	7.4 meters between 2 plots 30 ha in each plot. 160 trees/ha in savannah	14	125 plots	Estate	Major pest and disease	Mitigation and progress	13	Elephant intrusion	Trench: 32,482 km Traps: 5	
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Criterion / Indicator		Assessment Findings			Compliance						
				January – October 2020, N° elephant intrusion: 623 palm trees destroyed							
		14		Trench: 37, 881 km Traps: 5 January – October 2020, N° elephant intrusion: 169 palm trees destroyed							
		<p>iii. Lot 1: Pest and diseases: Elephant Measures taken:</p> <ul style="list-style-type: none"> <li>- Trench; Sensor, Barbed net and Patrol (Elephant)</li> <li>- Trap and removing (Rhychophorus)</li> <li>- Round around the palm tree (Rodents)</li> </ul>									
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Criterion / Indicator		Assessment Findings		Compliance
			N° elephant intrusion: 1973 palm trees destroyed on 14 ha from January to November 2020.	
7.1.2	Species referenced in the Global Invasive Species Database and CABI.org are not to be used in managed areas, unless plans to prevent and monitor their spread are implemented. - Minor compliance -	Species referenced in the Global Invasive Species Database and CABI.org are not used in all lot.		Complied
7.1.3	There is no use of fire for pest control unless in exceptional circumstances, i.e. where no other effective methods exist, and with prior approval of government authorities. [see guidance section for NI additional guidance for this process]. - Minor compliance -	No use of fire for pest control was observed.		Complied
<b>Criterion 7.2:</b> Pesticides are used in ways that do not endanger health of workers, families, communities or the environment.				
7.2.1	<b>(C)</b> Justification of all pesticides used is demonstrated. Selective products and application methods that are specific to the target pest, weed or disease are prioritised. - Critical (Major) compliance -	Olam Palm Gabon, Agriculture Policy Manual Volume 1 and Volume 2 dated April 2013. The use of pesticide is specific to the target pest, weed and disease. Based on Olam Palm Gabon, Chapter 9: Immature Maintenance and Ablation.  IPM Practices dated 25/11/2017, entitled OPG Agriculture Circular no.3: Treatment and Management of Rhynchophorus Phoenicis Ref to Chapter 15: Integrated Pest & Disease Management Practices.		Complied

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<p>7.2.2 (C) Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per ha and number of applications) are provided.</p> <p>- Critical (Major) compliance -</p>	<p>Olam Palm Gabon - Mouila has a record of pesticides used. The list contains trade name, active ingredient applied per ha, number of applications, LD 50 by oral route, LD 50 by cutaneous route, DL 50 by inhalation route, CLASS N °. Records for 2020 has been reviewed during the audit. Records are filled by team leader. For example: from January to October 2020,</p> <p>i. Lot 2</p> <table border="1" data-bbox="1137 662 1917 1027"> <thead> <tr> <th>Estate</th> <th>Active ingredient</th> <th>Dosage PC Kg /Hha</th> <th>Qtité m.a. (g)/ha</th> </tr> </thead> <tbody> <tr> <td rowspan="3">7</td> <td>Glyphosate IPA Sel</td> <td>0.75 l/ha</td> <td>5054.119</td> </tr> <tr> <td>Metasulfuron-methyl</td> <td>0.03 g/ha</td> <td>276.101</td> </tr> <tr> <td>Triclopyr-2-butoxyethyl ester</td> <td>0.37 l/ha</td> <td>922.98</td> </tr> <tr> <td rowspan="3">9</td> <td>Glyphosate Isopropylamine</td> <td>0.72 l/ha</td> <td>6309</td> </tr> <tr> <td>Metasulfuron-methyl</td> <td>0.03 g/ha</td> <td>410.5</td> </tr> <tr> <td>Triclopyr-2-butoxyethyl ester</td> <td>0.13 l/ha</td> <td>1684</td> </tr> </tbody> </table> <p>ii. Lot 3:</p> <table border="1" data-bbox="1137 1117 1917 1382"> <thead> <tr> <th>Estate</th> <th>Active ingredient</th> <th>Dosage PC Kg /Hha</th> <th>Qtité m.a. (g)/ha</th> </tr> </thead> <tbody> <tr> <td rowspan="4">14</td> <td>Glyphosate IPA Sel</td> <td>1.46 l/ha</td> <td>7831.66</td> </tr> <tr> <td>Metasulfuron-methyl</td> <td>0.08 g/ha</td> <td>454.93</td> </tr> <tr> <td>Glyphosate Isopropylamine</td> <td>0.50 l/ha</td> <td>300.02</td> </tr> <tr> <td>Triclopyr-2-butoxyethyl ester</td> <td>0.23 l/ha</td> <td>337</td> </tr> </tbody> </table>	Estate	Active ingredient	Dosage PC Kg /Hha	Qtité m.a. (g)/ha	7	Glyphosate IPA Sel	0.75 l/ha	5054.119	Metasulfuron-methyl	0.03 g/ha	276.101	Triclopyr-2-butoxyethyl ester	0.37 l/ha	922.98	9	Glyphosate Isopropylamine	0.72 l/ha	6309	Metasulfuron-methyl	0.03 g/ha	410.5	Triclopyr-2-butoxyethyl ester	0.13 l/ha	1684	Estate	Active ingredient	Dosage PC Kg /Hha	Qtité m.a. (g)/ha	14	Glyphosate IPA Sel	1.46 l/ha	7831.66	Metasulfuron-methyl	0.08 g/ha	454.93	Glyphosate Isopropylamine	0.50 l/ha	300.02	Triclopyr-2-butoxyethyl ester	0.23 l/ha	337	<p>Complied</p>
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		13	Thiram	0.11 g/ha	3	
			Glyphosate Isopropylamine	0.5 l/ha	300.02	
			Metasulfuron-methyl	0.04 g/ha	282.4	
			Triclopyr-2-butoxyethyl ester	0.34 l/ha	396	
			Glyphosate IPA Sel	0.8 l/ha	5060	
		iii. Lot 1:				
		<b>Estate</b>	<b>Active ingredient</b>	<b>Dosage PC Kg /Hha</b>	<b>Qtité m.a. (g)/ha</b>	
		6	Hasten spray	0.08 l/ha	563.5	
			Metasulfuron-methyl	0.05 g/ha	366.5	
			Glyphosate Isopropylamine	0.81 l/ha	4964	
			Triclopyr-2-butoxyethyl ester	0.37 l/ha	2616	
7.2.3	<b>(C)</b> Any use of pesticides is minimised as part of a plan, eliminated where possible, in accordance with IPM plans. - Critical (Major) compliance -	Used of pesticides are still relevant for the treatment of pest and disease. Whenever possible, IPM approach will be the used to minimise and eliminated the chemical treatment/application.				Complied
7.2.4	There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in national best practice guidelines. - Minor compliance -	No prophylactic use of pesticides used in Mouila Plantation.				Complied
7.2.5	Pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat, are not used, unless in exceptional circumstances, as validated	No pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam				Complied

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Criterion / Indicator		Assessment Findings	Compliance												
	<p>by a due diligence process, or when authorised by government authorities for pest outbreaks.</p> <p>The due diligence refers to:</p> <ul style="list-style-type: none"> <li>a) Judgment of the threat and verify why this is a major threat</li> <li>b) Why there is no other alternative which can be used</li> <li>c) Which process was applied to verify why there is no other less hazardous alternative</li> <li>d) What is the process to limit the negative impacts of the application</li> <li>e) Estimation of the timescale of the application and steps taken to limit application to the specific outbreak.</li> </ul> <p>- Minor compliance -</p>	<p>Conventions, and paraquat, are used. Only approved chemical used as per the register for 2020.</p>													
7.2.6	<p><b>(C)</b> Pesticides are only handled, used or applied by persons who have completed the necessary training and are always applied in accordance with the product label. All precautions attached to the products are properly observed, applied, and understood by workers (see Criterion 3.6). Personnel applying pesticides must show evidence of regular updates on the knowledge about the activity they carry out.</p> <p>- Critical (Major) compliance -</p>	<p>Field visit with workers confirmed that pesticides are only handled, used, and applied by trained personnel and accordance to product label. All precautions attached to the products are properly observed, applied, and understood by workers interviewed. Regular updates on the knowledge is given during refresher training programme. For example:</p> <ul style="list-style-type: none"> <li>i. Lot 2:</li> </ul> <table border="1" style="margin-left: 40px;"> <thead> <tr> <th>Chemical name</th> <th>Active ingredient</th> <th>Class</th> </tr> </thead> <tbody> <tr> <td>BEST UP 480 SL</td> <td>Glyphosate IPA Sel</td> <td>III</td> </tr> <tr> <td>ALLY 20 DF</td> <td>Metasulfuron-methyl</td> <td>III</td> </tr> <tr> <td>DALOPIR 480 EC</td> <td>Triclopyr-2-butoxyethyl ester</td> <td>III</td> </tr> </tbody> </table>	Chemical name	Active ingredient	Class	BEST UP 480 SL	Glyphosate IPA Sel	III	ALLY 20 DF	Metasulfuron-methyl	III	DALOPIR 480 EC	Triclopyr-2-butoxyethyl ester	III	Complied
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Criterion / Indicator		Assessment Findings			Compliance																		
		IMAS-THRAM 80	Dimethyldithiocarbamate	III																			
		ii. Lot 3: Sprayers have been trained by QSHE assistant on October 2020. Training topics were: PPE, Pesticide application and good practices after product application.																					
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**RSPO P&C Gabon-NI Checklist**  
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Criterion / Indicator		Assessment Findings			Compliance
		IMAS-THRAM 80	Dimethyldithiocarba mate	III	
		<p>iii. Lot 1: Sprayers of estate 6 Div 1 have been trained by QSHE assistant on 20<sup>th</sup> May 2020 and on 19<sup>th</sup> November 2020. Training topics were: PPE, Pesticide application and good practices after product application, maintenance of equipment, RSPO and irsk of contamination, Technic of spraying.</p>			
7.2.7	<p><b>(C)</b> Storage of all pesticides is in accordance with recognised best practices.</p> <p>- Critical (Major) compliance -</p>	<p>Olam Palm Gabon, Agriculture Policy Manual Volume 1 and Volume 2 dated April 2013. The use of pesticide is specific to the target pest, weed and disease. Based on Olam Palm Gabon, Chapter 9: Immature Maintenance and Ablation at point 6. Procedure of storage and handling of agrochemical products was available, Ref OPG-MLA-EHS-SOP-05 edited on 01<sup>st</sup> October 2013 and revised on 01<sup>st</sup> October 2017 Revision 2.</p> <p>However, although pesticides were well stored at lot 3, agent in-charge of pesticide mix has stored his personal clothes with pesticides and drinking water contrary to best practice.</p>			Non-compliance
7.2.8	<p>All pesticide containers are properly disposed of and/or handled responsibly if used for storing or for the same purposes.</p> <p>- Minor compliance -</p>	<p>Procedure of storage and handling of agrochemical products was available, Ref OPG-MLA-EHS-SOP-05 edited on 01<sup>st</sup> October 2013 and revised on 01<sup>st</sup> October 2017 Revision 2. Procedure explanation procedure of handling of empty containers.</p> <p>Workers interview at Block A50 reveal that they are aware of the zero burning policy including domestic waste are not allowed to be burned. Management of waste material disposal such as empty</p>			Complied

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Criterion / Indicator		Assessment Findings	Compliance														
		chemical container as in accordance with scheduled waste and domestic waste regulations and guidelines.															
7.2.9	<b>(C)</b> Aerial spraying of pesticides is prohibited. - Critical (Major) compliance -	No aerial spray at OPG Mouila plantations.	Complied														
7.2.10	<b>(C)</b> Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated. - Critical (Major) compliance -	<p>Olam Palm Gabon Mouila plantation has a SOP N°13/SD-MC (0)/0820 Revision 0 of 21st August 2020 for annual medical surveillance for pesticide operators.</p> <p>Before starting the spraying activity, a systematic visit is carried out. This medical visit is called an aptitude test (blood test and clinical examination). Also, every 6 months of spraying activity an annual dosage of ACHE (acetylcolonestérase) is performed and a clinical visit. Level value is 33 - 49.3 IU/g of hemoglobin.</p> <p>This is a screening activity that is performed and does not constitute a disease.</p> <p>If the level is exceeded, the worker is removed from the activity. A control 6 months later is carried out in order to follow the evolution of the rate.</p> <p>For example:</p> <table border="1"> <thead> <tr> <th>Estate</th> <th>Date of examination</th> <th>N° workers</th> <th>Type of participants</th> </tr> </thead> <tbody> <tr> <td rowspan="2">13</td> <td rowspan="2">19 – 26 October</td> <td rowspan="2">34</td> <td>5 Olam workers</td> </tr> <tr> <td>29 Contractors</td> </tr> <tr> <td rowspan="2">14</td> <td rowspan="2">19 – 22 October</td> <td rowspan="2">37</td> <td>18 Olam workers</td> </tr> <tr> <td>19 contractors</td> </tr> </tbody> </table>	Estate	Date of examination	N° workers	Type of participants	13	19 – 26 October	34	5 Olam workers	29 Contractors	14	19 – 22 October	37	18 Olam workers	19 contractors	Complied
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**RSPO P&C Gabon-NI Checklist  
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	<p>Annual medical surveillance for pesticide operators was carried for each visited estates summarize as per below:</p> <table border="1" data-bbox="1137 536 1919 938"> <thead> <tr> <th>Estate</th> <th>Worker ID</th> <th>Blood acetylcholinesterase</th> <th>Date of examination</th> </tr> </thead> <tbody> <tr> <td rowspan="7">14</td> <td>Contractor</td> <td>37.3</td> <td>22/10/20</td> </tr> <tr> <td>Contractor</td> <td>52.0</td> <td>22/10/20</td> </tr> <tr> <td>024543</td> <td>39.5</td> <td>22/10/20</td> </tr> <tr> <td>039533</td> <td>33.9</td> <td>22/10/20</td> </tr> <tr> <td>038538</td> <td>44.3</td> <td>22/10/20</td> </tr> <tr> <td>014174</td> <td>39.6</td> <td>22/10/20</td> </tr> <tr> <td>024508</td> <td>52.2</td> <td>22/10/20</td> </tr> </tbody> </table> <p>Normal range is 33 - 49.3 UI/g</p> <table border="1" data-bbox="1137 1027 1919 1337"> <thead> <tr> <th>Estate</th> <th>Worker ID</th> <th>Blood acetylcholinesterase</th> <th>Date of examination</th> </tr> </thead> <tbody> <tr> <td rowspan="5">13</td> <td>Contractor</td> <td>40.9</td> <td>19/10/20</td> </tr> <tr> <td>Contractor</td> <td>35.8</td> <td>19/10/20</td> </tr> <tr> <td>050885</td> <td>42.9</td> <td>19/10/20</td> </tr> <tr> <td>055281</td> <td>39.6</td> <td>19/10/20</td> </tr> <tr> <td>050705</td> <td>34.7</td> <td>19/10/20</td> </tr> </tbody> </table> <p>Normal range is 33 - 49.3 UI/g</p>	Estate	Worker ID	Blood acetylcholinesterase	Date of examination	14	Contractor	37.3	22/10/20	Contractor	52.0	22/10/20	024543	39.5	22/10/20	039533	33.9	22/10/20	038538	44.3	22/10/20	014174	39.6	22/10/20	024508	52.2	22/10/20	Estate	Worker ID	Blood acetylcholinesterase	Date of examination	13	Contractor	40.9	19/10/20	Contractor	35.8	19/10/20	050885	42.9	19/10/20	055281	39.6	19/10/20	050705	34.7	19/10/20	
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7.2.11	<p><b>(C)</b> No work with pesticides is undertaken by persons under the age of 18, pregnant or breastfeeding women or other people that have medical restrictions and they are offered alternative equivalent work.</p> <p>- Critical (Major) compliance -</p>	<p>In all lot visited, no pregnant or breastfeeding women undertaking the work with pesticide. It was confirmed during interview with doctor and female sprayers in Block. However, Total of 1 female is sprayer in lot 3 estate 15 and 21 female in Lot 2.</p> <p>i. For lot 3: Mlle 050685. Her last result from October 2020 was 42,6 UI/g.</p>				Complied																																		

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Criterion / Indicator		Assessment Findings	Compliance
		ii. For lot 2 estate 9: Mlle 14640. Her last result from October 2020 was 35.4 UI/g.	
<b>Criterion 7.3:</b> Waste is reduced, recycled, reused and disposed of in an environmentally and socially responsible manner.			
7.3.1	<p>A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented.</p> <p>- Minor compliance -</p>	<p>OPG has in place a waste management with the document referenced OPG-MLA-QEHS-PLN-01 dated 01/02/2016. Waste from OPG sites (Lot1, 2 and 3) are categorized according to its state, i.e. solid, liquid and gaseous waste. Wastes are stored in containers or receptacles of variable volume. Solid waste is placed in 200 liter plastic bins. In order to maintain the sorting which is done at the source, the bins are painted in three colors: blue for plastic waste, red for metal waste, and green for organic waste collection. Waste collection method depends on the type of waste i.e. solid waste is initially pre-collected on site three times a week (Monday, Wednesday, Friday), then transported to the recycling center. The final collection is made every three months in a dump truck from the recycling center to the Lambarene landfill by a subcontractor company having the authorizations for this activity. Liquid waste is collected every six months in tanker trucks, by ENGEN and TTRB. Solid waste is collected every six months, in tanker trucks by the subcontracting companies. However OPG is yet to finalize a 3<sup>rd</sup> party contract with International Recycling Company SARL. The company's mandate will include lifting of used oils, filters, batteries, tyres, plastics waste, electronic waste and plastic medical waste. Contract as sighted is yet to be concluded. All waste are currently segregated and stored at the landfill site. A visit to the area established compliance. However Green Sun with authorization number 001397/MFEPRN/SG/DGEPN is currently lifting all waste filter with 1700 piece collected on 24/06/2020. Also TTRB with authorization number 1788/MEFEDD/SG/DGEPN/CSECD lifting</p>	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		waste oils. Waste oils lifted include 3200 and 3800 liters on 03/02/2020 and 08/07/2020 respectively.	
7.3.2	Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated. - Minor compliance -	Visit to the workers working area and also to the landfill sites in Lot1, 2 and 3 established compliance with OPG waste management plan. Interview with workers at the landfill site established training received as it was demonstrated in their activities on the ground.	Complied
7.3.3	The unit of certification does not use open fire for waste disposal. - Minor compliance -	As part of OPG plantation fire management plan referenced DS-PRP.02 dated 28/03/2020, fire is not used for any reason. Field visit and interview with workers as well as communities established the absence of use of fire in OPG activities including waste disposal.	Complied
<b>Criterion 7.4:</b> Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.			
7.4.1	Good agricultural practices, as contained in SOPs, are followed to manage soil fertility to optimise yield and minimise environmental impacts. - Minor compliance -	Olam Palm Gabon, Agriculture Policy Manual Volume 1 and Volume 2 dated April 2013. Good agricultural practices SOP were made available and reviewed. Methods, quantity and procedure were clearly described.	Complied

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Criterion / Indicator	Assessment Findings	Compliance											
<p>7.4.2 Periodic tissue and soil sampling is carried out by Companies to monitor and manage changes in soil fertility and plant health.</p> <p>- Minor compliance -</p>	<p>Lot 2:</p> <ul style="list-style-type: none"> <li>- Soil analysis done on October 2018 by PARAM AGRICLULTURAL SOIL SURVEYS (M) SDN. BHD. Major type of soils is Haplic Nitisol (UNESCO soil map) for around 2600ha. Based on the report, there was no fragile, marginal soils, or peat soil within Mouila Plantation.</li> <li>- Foliar analysis report was issued on 09 August 2020, Ref P-2020-7/8/9. 334 samples of oil palm leaves have been received on the lab on 03<sup>rd</sup> April 2020. Sample have been analysed at Lebamba Agricultural Services Laboratory. Summary of foliar analysis results for lot 2 estates as per the following table:</li> </ul> <table border="1" data-bbox="1137 802 1906 970"> <thead> <tr> <th>Estate/block</th> <th>Number of sample</th> <th>Date of sampling</th> <th>Number of block</th> </tr> </thead> <tbody> <tr> <td>7</td> <td>120</td> <td rowspan="2">10<sup>th</sup> February until 12<sup>th</sup> March</td> <td>127</td> </tr> <tr> <td>9</td> <td>77</td> <td>77</td> </tr> </tbody> </table> <p>Recommendation are given per each plots here sample has been taken.</p> <p>Lot 3</p> <ul style="list-style-type: none"> <li>- Soil analysis done on October 2018 by PARAM AGRICLULTURAL SOIL SURVEYS (M) SDN. BHD. Major type of soils is Carbic Podsol (UNESCO soil map) for around 2.435, 8 ha. Based on the report, there was no fragile, marginal soils, or peat soil within Mouila Plantation.</li> <li>- Foliar analysis report was issued on 5 May 2020, Ref P-2020-12/13/14/15/17. 413 samples of oil palm leaves have been received on the lab on April 2020. Sample have been analysed</li> </ul>	Estate/block	Number of sample	Date of sampling	Number of block	7	120	10 <sup>th</sup> February until 12 <sup>th</sup> March	127	9	77	77	<p>Complied</p>
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<p>7.4.3 A nutrient recycling strategy is in place, which includes the recycling of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), palm residues and optimal use of inorganic fertilisers.</p> <p>- Minor compliance -</p>	<p>Olam Palm Gabon-Agriculture Policy Manual Volume 1 dated April 2013, Chapter 7: Fertilizing Programme for Nursery, Immature and Mature Plantings, indicate that the nutrient strategy includes the use of Empty Fruit Bunches (EFB). EFB should be distributed in the field to improve the soil structure and to conserve soil moisture.</p> <p>For example:</p> <p>i. Lot 2</p> <table border="1" data-bbox="1137 673 1915 855"> <thead> <tr> <th>Estate</th> <th>Tonnage applied (mt)</th> <th>Hectare covered (ha)</th> <th>Application rate (mt/ha)</th> </tr> </thead> <tbody> <tr> <td>7</td> <td>300</td> <td>24.45</td> <td>12.26</td> </tr> <tr> <td>9</td> <td colspan="3">No EFB application in 2020</td> </tr> </tbody> </table> <p>ii. Lot 3:</p> <p>Estate 13: Application from March to October 2020            Estate 14: Application from June to November 2020</p> <table border="1" data-bbox="1137 1027 1915 1241"> <thead> <tr> <th>Estate</th> <th>Tonnage applied (mt)</th> <th>Hectare covered (ha)</th> <th>Application rate (mt/ha)</th> </tr> </thead> <tbody> <tr> <td>13</td> <td>689.25</td> <td>27.57</td> <td>25</td> </tr> <tr> <td>14</td> <td>1925.325</td> <td>77.013</td> <td>25</td> </tr> </tbody> </table> <p>iii. Lot 1:</p> <p>Estate 6: Application from January to September 2020</p>	Estate	Tonnage applied (mt)	Hectare covered (ha)	Application rate (mt/ha)	7	300	24.45	12.26	9	No EFB application in 2020			Estate	Tonnage applied (mt)	Hectare covered (ha)	Application rate (mt/ha)	13	689.25	27.57	25	14	1925.325	77.013	25	<p>Complied</p>
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Criterion / Indicator		Assessment Findings				Compliance																											
		<table border="1"> <thead> <tr> <th>Estate</th> <th>Tonnage applied (mt)</th> <th>Hectare covered (ha)</th> <th>Application rate (mt/ha)</th> </tr> </thead> <tbody> <tr> <td>6</td> <td>4826</td> <td>98</td> <td>49.24</td> </tr> </tbody> </table>	Estate	Tonnage applied (mt)	Hectare covered (ha)	Application rate (mt/ha)	6	4826	98	49.24																							
Estate	Tonnage applied (mt)	Hectare covered (ha)	Application rate (mt/ha)																														
6	4826	98	49.24																														
7.4.4	Records of fertiliser inputs are maintained. - Minor compliance -	Fertilizers are applied based on the recommendation provided from leaf sampling analysis done yearly. Record shows application date, filed number, dosage applied per palm, type of fertilizer and number of applicators. Sample of records verified: <table border="1"> <thead> <tr> <th>Estate</th> <th>Product name</th> <th>Block</th> <th>Tonnage applied (mt)</th> <th>Hectare covered (ha)</th> <th>Dosage</th> </tr> </thead> <tbody> <tr> <td rowspan="2">7</td> <td>Borax 48</td> <td>C55</td> <td>232.84</td> <td>23.78</td> <td>0.075</td> </tr> <tr> <td>NPK 11/7/35/3 + B</td> <td>D43</td> <td>6659</td> <td>27.30</td> <td>2</td> </tr> <tr> <td rowspan="2">9</td> <td>Borax 48</td> <td>M04</td> <td>263.10</td> <td>27.19</td> <td>0.075</td> </tr> <tr> <td>NPK 11/7/35/3 + B</td> <td>M18</td> <td>3902.25</td> <td>20.69</td> <td>1.5</td> </tr> </tbody> </table>	Estate	Product name	Block	Tonnage applied (mt)	Hectare covered (ha)	Dosage	7	Borax 48	C55	232.84	23.78	0.075	NPK 11/7/35/3 + B	D43	6659	27.30	2	9	Borax 48	M04	263.10	27.19	0.075	NPK 11/7/35/3 + B	M18	3902.25	20.69	1.5			Complied
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<b>Criterion 7.5:</b> Practices minimise and control erosion and degradation of soils.																																	
7.5.1	<b>(C)</b> Practices minimise and control erosion and degradation of soils. - Critical (Major) compliance -	Most of the area at Mouila plantation are generally flat area.				Complied																											

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Criterion / Indicator		Assessment Findings	Compliance
7.5.2	There is no extensive replanting of oil palm on steep terrain. - Minor compliance -	No steep terrain at Mouila plantation. Thus, this indicator is not available.	Complied
7.5.3	There is no new planting of oil palm on steep terrain. - Minor compliance -	No steep terrain at Mouila plantation. Thus, this indicator is not available.	Complied
<b>Criterion 7.6:</b> Soil surveys and topographic information are used for site planning in the establishment of new plantings, and the results are incorporated into plans and operations.			
7.6.1	<b>(C)</b> To demonstrate the long-term suitability of land for oil palm cultivation, soil maps or soil surveys identifying marginal and fragile soils, including steep terrain, are taken into account in plans and operations. - Critical (Major) compliance -	Soil analysis done on October 2018 by PARAM AGRICLULTURAL SOIL SURVEYS (M) SDN. BHD. Major type of soils is Haplic Nitisol (UNESCO soil map) for around 2600ha. Based on the report, there was no fragile, marginal soils, or peat soil within Mouila Plantation. Semi detailed map of soils has been reviewed, scale 1 for 4.5 km and scale 1 for 6 km.	Complied
7.6.2	Extensive planting on marginal and fragile soils, is avoided, or, if necessary, done in accordance with the soil management plan for best practices. - Minor compliance -	No extensive planting on marginal and fragile soils was done by Olam Palm Gabon - Mouila. According to the interview done, there is no marginal and fragile soils in the concession of Olam Palm Gabon - Mouila.	Complied
7.6.3	Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure. - Minor compliance -	Soil analysis done on October 2018 by PARAM AGRICLULTURAL SOIL SURVEYS (M) SDN. BHD. Major type of soils is Haplic Nitisol (UNESCO soil map) for around 2600ha. Based on the report, there was no fragile, marginal soils, or peat soil within Mouila Plantation. Most of the area at Mouila plantations are generally flat area. No hilly or steep area at all visited estates.  Topografic information was use as guide for road maintenance operation. The road maintenance program covers the distribution of gravel stones, grading and compacting and side dig construction	Complied



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Criterion / Indicator		Assessment Findings	Compliance
		to prevent erosion. Records reviewed saw evidence of road maintenance.	
<b>Criterion 7.7:</b> No new planting on peat, regardless of depth after 15 November 2018 and all peatlands are managed responsibly.			
7.7.1	<p><b>(C)</b> There is no new planting on peat regardless of depth after 15 November 2018 in existing and new development areas.</p> <p>- Critical (Major) compliance -</p>	Not applicable as there is no peat soil identified within Mouila Lot 1, 2 and 3 plantations.	Not Applicable
7.7.2	<p>Areas of peat within the managed areas are inventoried, documented and reported (effective from 15 November 2018) to RSPO Secretariat.</p> <p><b>PROCEDURAL NOTE:</b> Maps and other documentation of peat soils are provided, prepared and shared in line with RSPO Peatland Working Group (PLWG) audit guidance (see Procedural Note for 7.7.5 below).</p> <p>- Minor compliance -</p>	Same as 7.7.1 above.	Not Applicable
7.7.3	<p><b>(C)</b> Subsidence of peat is monitored, documented and minimised.</p> <p>- Critical (Major) compliance -</p>	Same as 7.7.1 above.	Not Applicable
7.7.4	<p><b>(C)</b> A documented water and ground cover management programme is in place.</p> <p>- Critical (Major) compliance -</p>	Same as 7.7.1 above.	Not Applicable
7.7.5	<p><b>(C)</b> For plantations planted on peat, drainability assessments are conducted following the RSPO Drainability Assessment Procedure, or other RSPO recognised methods, at least five years prior to replanting. The assessment result is used to set the timeframe for future replanting, as well as for phasing out of oil palm cultivation at least 40 years, or two cycles, whichever is greater, before reaching the natural gravity drainability limit for peat. When oil palm is phased out, it is replaced with</p>	Same as 7.7.1 above.	Not Applicable

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<p>crops suitable for a higher water table (paludiculture) or rehabilitated with natural vegetation.</p> <p><b>PROCEDURAL NOTE:</b>            Full details of the RSPO Drainability Assessment Guidelines and related concepts and detailed actions are in the manual currently being fine-tuned/tested by PLWG. A final version should be approved by PLWG in January 2019 and will include additional guidance on the steps to be followed after the decision not to replant as well as implications for other stakeholders, smallholders, local communities and the unit of certification. It is recommended that a further twelve-month methodology trial period is proposed for all related management units (i.e. those with plantations on peat) to utilise the methodology and provide feedback to the PLWG to enable further refinement of procedure as appropriate before January 2020. Units of certification have the option to defer replanting till after the availability of the revised guidelines. Additional guidance on alternative crops and rehabilitation of natural vegetation will be provided by PLWG.</p> <p><b>PROCEDURAL NOTE:</b>            PLWG and the Smallholder Interim Group (SHIG) will collaboratively develop guidance for Independent Smallholders [cross links to SHIG and GHG issues].</p> <p>- Critical (Major) compliance -</p>		
<p>7.7.6 <b>(C)</b> All existing plantings on peat are managed according to the 'RSPO Manual on Best Management Practices (BMPs) for existing oil palm cultivation on peat', version 2 (2018) and associated audit guidance.</p> <p>- Critical (Major) compliance -</p>	Same as 7.7.1 above.	Not Applicable
<p>7.7.7 <b>(C)</b> All areas of unplanted and set-aside peatlands in the managed area (regardless of depth) are protected as "peatland conservation areas";</p>	Same as 7.7.1 above.	Not Applicable

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	<p>new drainage, road building and power lines by the unit of certification on peat soils is prohibited; peatlands are managed in accordance with the 'RSPO BMPs for Management and Rehabilitation of Natural Vegetation Associated with Oil Palm Cultivation on Peat', version 2 (2018) and associated audit guidance.</p> <p>- Critical (Major) compliance -</p>		
<b>Criterion 7.8:</b> Practices maintain the quality and availability of surface and groundwater.			
7.8.1	<p>A water management plan is in place and implemented to promote more efficient use and continued availability of water sources and to avoid negative impacts on other users in the catchment. The plan addresses the following:</p> <p>b) The unit of certification does not restrict access to clean water or contribute to pollution of water used by communities.</p> <p>c) Workers have adequate access to clean water.</p> <p>- Minor compliance -</p>	<p>There is a water management plan in place captioned Olam Sustainable Water Management Plan referenced PLAN MLA/SD_WMP/0620. The plan which is dated June 2020 and approved by the Regional Manager was sighted. To ensure that water is protected, OPG as part of its water management plan conduct analysis on both surface water and drinking water. OPG has identified surface water sampling points in the plantations where on annual basis samples are collected and analysed to ensure that its operation does not impact on it negatively. According OPG water testing program 2020, surface water testing will done twice in a year. One in the dry season around May (by 3<sup>rd</sup> party lab) and the other in the wet season around November (by state own lab). For the year under review, OPG has contracted the services of Cabinte d'Expertise et Conseils Pro-Training &amp; Co. SRAL to conduct the analysis on all surface water in Lot1, Lot2 and Lot3. Result of the analysis is yet to be issued. However, invoice with reference numbers 530-2020/AEOPG, 531-2020/AEOPG and 532-2020/AEOPG with 50% advance payment with reference number 33/61649, 33/616450 and 33/61646 dated 05/10/2020 were sighted. Interview with communities during the audit stakeholder meeting did not established that OPG restrict access to clean or contribute to pollution of water used by communities.</p>	OFI

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		Furthermore, OPG provide clean water for drinking to all of its workers. In doing so water analysis on all drinking water is conducted on monthly basis. The analysis is done by Olam Lebamba Analytical Services Laboratory. In Lot3 Some results of analysis conducted on 28/01/2020, 04/08/2020 and 04/11/2020 were sighted. However, for some months turbidity was found to be high or ph low or chlorine injection was low. Interview with the team responsible established that these variations was due to technical issue with the water treatment machine. However, the issue has been resolved and new samples on 29 <sup>th</sup> November 2020 showed Moutassou water is okay for drinking but Mbadi chlorine injection need to be checked. Similar evidence was sighted in Lot1 (Mboukou and PK19). This is however raised as observation to regularly check on the chlorine dosing pump to ensure that it functions correctly and pumping the right amount of chlorine for safe drinking water.	
7.8.2	<b>(C)</b> Water courses and wetlands are protected, including maintaining and restoring appropriate riparian and other buffer zones in line with 'RSPO Manual on BMPs for the management and rehabilitation of riparian reserves' (April 2017). - Critical (Major) compliance -	As part of the measures to the maintain and restore appropriate riparian and other buffer zones, OPG does monitoring of the buffer zones as part of its HCV monitoring activities on weekly and monthly basis. Sample of weekly monitoring reports sighted include; 18/02/2020, 03/04/2020, 30/05/2020, 08/05/2020 and 15/07/2020. Review of 15/07/2020 monitoring report established an incident where farming activity in the buffer zone around block G17 by one village person from Monfi was reported. OPG secured the buffer zone, went ahead to identify the village person and sensitize him on the need of the buffer and its protection. Evidence of sensitization dated 26/08/2020 was sighted.	Complied
7.8.3	Mill effluent is treated to be in compliance with national regulations. Discharge quality of mill effluent, especially Biochemical Oxygen Demand (BOD), is regularly monitored.	OPG contracted the services of Cabinte d'Expertise et Conseils Pro-Training & Co. SRAL (3 <sup>rd</sup> Party Lab) to conduct the analysis on it effluent from the mill. The result of samples is yet to be received	OFI

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	- Minor compliance -	by the company. Invoice with reference # 530-2020/AEOPG dated 29/06/2020 was sighted. Similarly, 50% advance payment made by OPG with reference number 33/61649, dated 05/10/2020 was sighted. Prior to that OPG has conducted POME analysis on 25/11/2020. The result show BOD = 4800mg/l and COD = 6500mg/l. Analysis was done by Direction Du Laboratoire Des Roches Et Des Eaux. The report mention that the BOD is below the max limit of 5000mg/l hence OPG can continue discharge into the planation as fertigation. OPG is however not releasing the POME into the open environment i.e. water body or swamps but into the plantation as ferti-gation. This is raised as observation to follow-up on the analysis conducted on 29/06/2020.	
7.8.4	Mill water use per tonne of FFB is monitored and recorded. - Minor compliance -	OPG Bilala POM monitors is daily water consumption by using a flowmeter which has been installed to the water reservoir flowing from the water treatment point at the mill. Monitoring is done on daily basis and reported on monthly. The average mill water use per tonne of FFB recorded under the year of review was 0.78.	Complied
<b>Criterion 7.9:</b> Efficiency of fossil fuel use and the use of renewable energy is optimised			
7.9.1	A plan for improving efficiency of the use of fossil fuels and to optimise renewable energy is in place, monitored and reported. - Minor compliance -	To ensure and improve efficiency of the use of fossil fuels and to optimize renewable energy, OPG has implement; <ol style="list-style-type: none"> <li>1. Monitoring the total fiber and shell used/MT of CPO</li> <li>2. Monitor the direct fossil fuel used/MT of FFB or CPO</li> <li>3. Monitoring of vehicle fuel consumption</li> <li>4. Fuel allocation quota is determine to all vehicle based on travel distance</li> <li>5. Renewable energy use i.e. methane capture facility is under construction.</li> </ol> 1. Average fossil fuel consumed at the mill (diesel) for 2020	Complied

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		<p>reviewed recorded 4.23 liter/Mt (Diesel/CPO)</p> <p>2. Lot1 estate average energy consumption – energy 3.44 as against 95.26 liters if diesel used.</p> <p>3. Lot2 estate - energy 0.68 as against 18.93 of diesel used</p> <p>4. Lot3 estate - energy 1.3 as against diesel 36.73 used</p> <p>Efficiency of fossil fuel use (Bilala POM – Mouila Planation) monitoring is done of monthly basis with Jan – Sept report sighted.</p>	
<b>Criterion 7.10:</b> Plans to reduce pollution and emissions, including greenhouse gases (GHG), are developed, implemented and monitored and new developments are designed to minimise GHG emissions.			
7.10.1	<p><b>(C)</b> GHG emissions are identified and assessed for the unit of certification. Plans to reduce or minimise them are implemented, monitored through the Palm GHG calculator and publicly reported.</p> <p>- Critical (Major) compliance -</p>	OPG has identified fossil fuel consumption, POME treatment and fertilizer usage as the main source of GHG emissions. However, OPG records all fuel and fertilizer consumption through it SAP application software. Records were sighted in the software to established compliance.	Complied
7.10.2	<p><b>(C)</b> Starting 2014, the carbon stock of the proposed development area and major potential sources of emissions that may result directly from the development are estimated and a plan to minimise them prepared and implemented (following the RSPO GHG Assessment Procedure for New Development).</p> <p>- Critical (Major) compliance -</p>	The development of Mouila concession started with New Planting notification with NPP notification done for for Lot1, 2 and 3 concessions. For Lot 3 and Lot 3 extension, the planting decision has taken the scenario of lowest GHG emission. While Lot 1 and 2 it is not applicable as the NPP was prior 2014.	Complied
7.10.3	<p><b>(C)</b> Other significant pollutants are identified and plans to reduce or minimise them implemented and monitored.</p> <p>- Critical (Major) compliance -</p>	OPG GHG calculation captures all significant pollutants including POME which is monitored on regular basis as mentioned in 7.8.3 above.	Complied
<b>Criterion 7.11:</b> Fire is not used for preparing land and is prevented in the managed area			
7.11.1	<p><b>(C)</b> Land for new planting or replanting is not prepared by burning.</p> <p>- Critical (Major) compliance -</p>	OPG has zero burning policy captured in it Agriculture Manual policy, volume 1, chapter 2, section 2.5. The policy explicitly prohibit	Complied

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		the use of fire for land preparation. There is currently no new planting or replanting ongoing. The last planting was done in Lot1 2015, Lot2 2017 and Lot3 2017. Field observation and interviews with workers and community established that OPG does not use fire for land preparation.	
7.11.2	The unit of certification establishes fire prevention and control measures for the areas directly managed by the unit of certification. - Minor compliance -	OPG has fire prevention plan referenced DS-PRP.01 dated 05/05/2017. The plan seek to provide guidance for planning and management of potential fire hazards in the plantations. The approach has been developed to assist plantation personnel by providing guidelines in order to prevent and avoid any losses, threat to live and damage to property resulting from fire.  OPG conduct fire prevention training and drills for worker to equip them against and fire. Firefighting training conducted on 16/11/2020 and 16/07/2020 was sighted. Similarly fire awareness training with communities on 17/06/2020 was sighted.	Complied
7.11.3	The unit of certification engages with adjacent stakeholders on fire prevention and control measures. - Minor compliance -	Fire awareness training for villages around OPG plantation were sighted. For instance; Lot1 – 17 to 20. June 2020. Villages include Rembo/Mboukou, Doubou, Mautambe Sane Foumou and Guimba/Douya Lot2 – 17 to 20. June 2020. Villages include Diangui and Bemboudie	Complied
<b>Criterion 7.12:</b> Land clearing does not cause deforestation or damage any area required to protect or enhance High Conservation Values (HCVs) or High Carbon Stock (HCS) forest. HCVs and HCS forests in the managed area are identified and protected or enhanced.			
7.12.1	<b>(C)</b> Land clearing since November 2005 has not damaged primary forest or any area required to protect or enhance HCVs. Land clearing since 15 November 2018 has not damaged HCVs or HCS forests.	OPG has not carried out any land clearing since 15 November 2018. All planting for OPG Mouila has undergone New Planting Procedure with notification on the RSPO website.	Complied

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	<p>A historic Land Use Change Analysis (LUCA) is conducted prior to any new land clearing, in accordance with the RSPO LUCA guidance document.</p> <p>- Critical (Major) compliance -</p>		
7.12.2	<p><b>(C)</b> HCVs, HCS forests and other conservation areas are identified as follows</p> <p>a) For existing plantations with an HCV assessment conducted by an RSPO-approved assessor and no new land clearing after 15 November 2018, the current HCV assessment of those plantations remains valid</p> <p>b) Any new land clearing (in existing plantations or new plantings) after 15 November 2018 is preceded by an HCV-HCS assessment, using the HCSA Toolkit and the HCV-HCSA Assessment Manual. This will include stakeholder consultation and take into account wider landscape-level considerations.</p> <p><b>PROCEDURAL NOTE:</b> For details of transitional measures, refer to Annex 5: RSPO transition from HCV assessments to HCV-HCSA assessments.</p> <p>- Critical (Major) compliance -</p>	<p>OPG has no new land clearing from 15 November 2018. However OPG has valid HCVs assessment conducted in place.</p> <p>For Lot 1: HCV was conducted by Proforest captioned HCV Assessment Olam Palm Gabon 35,354 Ha Concession North of Mouila – Version 4 May 2012. The assessment was led by Christopher Stewart and at the time when the HCVRN ALS has not instituted, hence no license number. NPP notification is as follow; <a href="https://www.rspo.org/certification/new-planting-procedure/public-consultations/olam-international-ltd-olam-palm-gabon-new-planting-assessment-call-for-comments-1">https://www.rspo.org/certification/new-planting-procedure/public-consultations/olam-international-ltd-olam-palm-gabon-new-planting-assessment-call-for-comments-1</a></p> <p>For Lot 2: HCV was conducted by Proforest captioned HCV Assessment Olam Palm Gabon Mouila Lot 2, 31,801 ha Concession Northeast of Mandji town, Ngounié Province, Gabon dated December 2013. The assessment was led by Ellen Brown and at the time when the HCVRN ALS has not instituted, hence no license number. NPP notification is as follow; <a href="https://www.rspo.org/certification/new-planting-procedure/public-consultations/olam-palm-gabon">https://www.rspo.org/certification/new-planting-procedure/public-consultations/olam-palm-gabon</a></p> <p>For Lot 3: HCV was conducted by Proforest captioned High Conservation Value assessment for RSPO compliance Olam Palm Gabon, Mouila Lot 3, Ngounié Province 18 March 2015. The assessment was led by David Hoyle (ALS15008DH). NPP notification</p>	Complied



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		<p>is as follow; <a href="https://www.rspo.org/certification/new-planting-procedure/public-consultations/olam-international-limited-olam-palm-gabon-mouila-lot-3">https://www.rspo.org/certification/new-planting-procedure/public-consultations/olam-international-limited-olam-palm-gabon-mouila-lot-3</a></p> <p>Lot 3 Extension: HCV was conducted by Proforest captioned High Conservation Value Assessment for RSPO NPP Compliance Olam Palm Gabon, Mouila Lot 3 Extension, Ngounié Province December 2016. The assessment was led by David Hoyle (ALS15008DH). NPP notification is as follow; <a href="https://www.rspo.org/certification/new-planting-procedure/public-consultations/olam-international-limited-olam-palm-gabon-mouila-lot-3-extension">https://www.rspo.org/certification/new-planting-procedure/public-consultations/olam-international-limited-olam-palm-gabon-mouila-lot-3-extension</a></p>	
7.12.3	<p>In High Forest Cover Landscapes (HFCLs) within HFCCs, a specific procedure will apply for legacy cases and development by indigenous peoples and local communities with legal or customary rights, taking into consideration regional and national multi-stakeholder processes. Until this procedure is developed and endorsed, 7.12.2 applies.</p> <p><b>PROCEDURAL NOTE:</b></p> <p>There should be demonstrable benefits to the local community; clear recognition of legal and customary lands based on participatory land use planning; development should be proportional to the needs of the local community; with a balance between conservation and development. This procedure will also cover planting on previous or abandoned agricultural land / plantations. All other P&amp;C requirements apply, including FPIC and HCV requirements.</p> <p>- Minor compliance -</p>	<p>OPG has not commission any new plantings in its Mouila Concessions since 15 November, 2018. Current developed area (Lot1, 2 and 3) has all been subjected to the RSPO New Planting Procedure with successful public notification on the RSPO website.</p>	Complied
7.12.4	<p><b>(C)</b> Where HCVs, HCS forests after 15 November 2018, peatland and other conservation areas have been identified, they are protected and/or enhanced. An integrated management plan to protect and/or enhance HCVs, HCS forests, peatland and other conservation areas is developed,</p>	<p>OPG has not developed new plantings since 15 November, 2018. The HCV assessments conducted for Lot1, 2 and 3 have not identified any peatland. However, the report identifies HCV areas that are under protection by the company. Subsequently, OPG has</p>	Complied

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	<p>implemented and adapted where necessary, and contains monitoring requirements. The integrated management plan is reviewed at least once every five years. The integrated management plan is developed in consultation with relevant stakeholders and includes the directly managed area and any relevant wider landscape level considerations (where these are identified).</p> <p>- Critical (Major) compliance -</p>	<p>developed management and monitoring plans for all the HCVs identified in all concessions based on the recommendations from HCV Assessment reports. The management and monitoring plans for Lot1, 2 and 3 as seen is captioned;</p> <p>Plan De Gestion Des HCV Olam Palm Gabon Plantation Mouila (<i>HCV Management Plan Olam Palm Gabon Plantation Mouila</i>) referenced No1/HCV Plan/06/20 and dated 06/2020. Even though each Lot has it management and monitoring plan, they all bear the same document title.</p> <p>According to plans, review is will be done annually is which informed from the weekly and monthly monitoring. .</p>	
7.12.5	<p>Where rights of local communities have been identified in HCV areas, HCS forest after 15 November 2018, peatland and other conservation areas, there is no reduction of these rights without evidence of a negotiated agreement, obtained through FPIC, encouraging their involvement in the maintenance and management of these conservation areas.</p> <p>- Minor compliance -</p>	<p>The HCV assessments identifies social HCVs including HCV 5 and 6 and has been documented as such. Reviewing the reports, it was evident that the HCV assessment team has been in consultation with the communities around the concession as captured in the report. This was also confirmed by the communities during the audit stakeholder meetings for Lot1, 2 and 3. OPG however, does not prevent communities from accessing the social HCVs as confirmed by the communities during the consultation. Monitoring is solely done by OPG, however the communities are also sensitize. Evidence of such sensitization conducted from 28 July to 02 August 2020 in Bounougounga community (lot3) was sighted. Similar sensitization done with Mboukou 1 and 2 and PK 19 (lot1) from 23 to 27 October, 2020 was also sighted. Additionally Lot2 community sensitization on 16 and 17 August 2020 in Diangui were also sighted.</p>	Complied
7.12.6	<p>All rare, threatened or endangered (RTE) species are protected, whether or not they are identified in an HCV assessment.</p>	<p>As part of measures to protect all HCVs including RTEs, OPG has in place HCV monitoring team that goes around all the HCV areas to monitor any activity including encroachment, hunting, fishing, farming etc. OPG also as part of it training program, train all</p>	OFI

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Criterion / Indicator		Assessment Findings	Compliance
	<p>A programme to regularly educate the workforce about the status of RTE species is in place. Appropriate disciplinary measures are taken and documented in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect, trade, possess or kill these species.</p> <p>- Minor compliance -</p>	<p>workers on buffer zones and HCV management with hunting, fishing, trapping swimming, farming etc clearly stated as prohibited. All new recruits also receive similar training as part of their induction. Field interview with workers in Lot 1, 2 and 3 during the audit confirmed receiving such training and are not permitted to hunt, fish, farm, swim etc. in the HCVs. However, interview with communities established OPG staff do hunt and fish in the HCV areas. This was also confirmed by one the company's HCV monitoring team but mentioned that this is done mostly by the contractor staff. It was also confirmed that the contractor staffs have been part of the company's HCV awareness trainings. Disciplinary measures are however not taken apart from verbally talking to them.</p>	
7.12.7	<p>The status of HCVs, HCS forests after 15 November 2018, other natural ecosystems, peatland conservation areas and RTE species is monitored. Outcomes of this monitoring are fed back into the management plan.</p> <p>- Minor compliance -</p>	<p>OPG carry out monitoring activities in all identified HCVs including RTEs. There are HCV monitoring teams in place in all concessions – Lot1, 2 and 3 that carry out daily monitoring and report on daily, weekly, monthly and annual basis. The monitoring activities according the team is reviewed on regular basis (any day) based on the outcome of field activities and feed back into the management plan. As part of OPG monitoring activities, cameras has been installed in most of the HCV areas to capture all activities including illegalities, elephants movement etc. Lot3 monitoring (camera and manual) reports dated 08/05/2020, 03/04/2020, 30/05/2020, 22/05/2020, 18/02/2020 and 15/07/2020 were sighted. Similarly, Lot2 monitoring (camera and manual) dated 08/02/2020, 25/01/2020, 20/03/2020, 30/07/2020, 30/09/2020 and 30/08/2020 were sighted. Also Lot1 monitoring (camera and manual) report for dates</p>	Complied

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Criterion / Indicator		Assessment Findings	Compliance
7.12.8	<p><b>(C)</b> Where there has been land clearing without prior HCV assessment since November 2005, or without prior HCV- HCSA assessment since 15 November 2018, the Remediation and Compensation Procedure (RaCP) applies.</p> <p>- Critical (Major) compliance -</p>	<p>OPG has not undertaken any new land clearing since 15 November 2018. All new plantings by OPG were prior to 15 November 2018 and has all under HCV assessment and NPP as captured in 7.12.2 above.</p>	<p>Complied</p>

**Appendix B: Approved Time Bound Plan**



RSPO Certification Time Bound Plan (revised Jan 2020<sup>1</sup>)

		2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021
OLAM	Olam joined RSPO as Processor and Trader	Feb 11										
	Olam Sustainable Palm Policy v1	June 11										
	Olam renewed membership as Grower		Feb 12									
	Olam Sustainable Palm Policy revision					June 15	Oct 16	Feb 17	Jan 18	Jan 19		
	RSPO membership date updated to 9 Oct 2006 as per group membership requirement <sup>2</sup>									Apr 19		
AWALA	NPP notification	Feb 11										
	RSPO independent gap assessment			Apr 13								
	Mill commissioned					Sep 15						
	RSPO initial certification						June 16					
	RSPO surveillance audit											
Mouila LOT 1	NPP notification		June 12									
	RSPO independent gap assessment						June 16					
	Mill commissioned							Jan 17				
	RSPO initial certification							Dec 17				
	RSPO surveillance audit											
Mouila LOT 3	NPP notification					May 15						
	RSPO independent gap assessment							May 17				
	Mill commissioned										Dec 20	
	RSPO initial certification <sup>3</sup>								Dec 18			
	RSPO surveillance audit											
Makouke	Inclusion under Olam RSPO membership						Aug 16					
	RSPO initial certification <sup>4</sup>									July 19		

<sup>1</sup> Lot 2 certification is brought forward from 2021 to 2020. Last revisions were in May 2019, Apr 2018 and Aug 2016 to update RSPO membership date, to bring forward Lot 3 certification from 2019 to 2018 and to include OPG's acquisition i.e. Makouke.

<sup>2</sup> Where a Parent who is an RSPO member and having one or more Related Entities in its Group who are separately holding RSPO membership, then the Parent shall declare to RSPO all its Related Entities, whether or not they are RSPO members, and register them under the Parent's membership. Thereafter the RSPO membership of the Related Entities shall effective be cancelled. Should any of the Related Entities hold a membership earlier than that of the Parent's membership, then the Parent's effective membership date shall change to follow that of the earliest membership date of the Related Entity.

<sup>3</sup> Lot 3 certified under Mouila Bilala Mill supply base

<sup>4</sup> Makouke certified under Awala mill supply base

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	RSPO surveillance audit												
Mouila LOT 2	NPP notification			Dec 13									
	RSPO initial certification										Dec 20		
	RSPO surveillance audit												
GRAINE	SOTRADER joined RSPO				July 15								
	NPP notification					June 16							
	RSPO independent gap assessment						Dec 17						
	RSPO initial certification <sup>5</sup>											Dec 21	
	100% certification of GRAINE Palm SH												Dec 21

<sup>5</sup> SOTRADER GRAINE Ndende initial certification is postponed from 2020 to 2021 due to immature field and on-going finalization of schemed smallholders' organization structure.

**Appendix C: GHG Reporting Executive Summary**

The GHG emissions that were produced in **2020** for **Bilala** and supply base was calculated using the PalmGHG Calculator version 3.0.1. The assessment team had verified the data input in the PalmGHG Calculator against operations records. PalmGHG Calculation Options selected 'Full version' and 'Exclude LUC Emission' calculation option is not applied. The records verified includes:

- i. Estates area planted data
- ii. Fuel consumed
- iii. Mill datas include CPO produced, PKO Produced and FFB Processed
- iv. Fertilizer consumed data for both estates and smallholders.

The summary of the Net GHG emitted in **2020** for **Bilala** and supply base are as following:

Emission per product	tCO <sub>2</sub> e/tProduct
CPO	-14.80
PKO	-14.80

Extraction	%
OER	23.12
KER	4.08

Production	t/yr
FFB Process	197,160.09
CPO Produced	47,793.28
PKO Produced	

Land Use	Ha
OP Planted Area	50,748.95
OP Planted on peat	0
Conservation (forested)	60,600.00
Conservation (non-forested)	0
<b>Total</b>	<b>111,348.95</b>

**Summary of Field Emission and Sink**

	Own Crop*		Group		3 <sup>rd</sup> Party		Total	
	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB
<b>Emission</b>								
Land Conversion	106,733.41	1.02	199,410.29	4.22	0	0	306,143.7	5.24
CO <sub>2</sub> Emission from fertilizer	15,065.23	0.14	22,717.43	0.48	0	0	377,82.66	0.62
NO <sub>2</sub> Emission	8,168.46	0.08	14,559.29	0.42	0	0	22,727.75	0.5
Fuel Consumption	4,849.75	0.04	7,095.09	0.15	0	0	11,944.84	0.19
Peat Oxidation	0	0	0	0	0	0	0	0
<b>Sink</b>								
Crop Sequestration	-148,713.85	-1.42	-326,384.29	-9.36	0	0	-475,098.14	-10.78
Conservation Sequestration	-161,975.32	-1.55	-373,728.68	-10.72	0	0	-535,704.00	-11.82
<b>Total</b>	<b>-176,172.32</b>	<b>-1.68</b>	<b>-456,330.86</b>	<b>-13.09</b>	<b>0</b>	<b>0</b>	<b>-1,010,802.14</b>	<b>-22.6</b>

\*Note: Includes both estates and smallholders

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**Summary of Mill Emission and Credit**

	tCO <sub>2</sub> e	tCO <sub>2</sub> e/tFFB
<b>Emission</b>		
POME	19,879.73	0.13
Fuel Consumption	313.92	0.00
Grid Electricity Utilization	0.00	0.00
<b>Credit</b>		
Export of Grid Electricity	0.00	0.00
Sales of PKS	0.00	0.00
Sales of EFB	0.00	0.00
<b>Total</b>	<b>20,198.62</b>	<b>0.13</b>

**Summary of Kernel Crusher Emission and Credit (if applicable)**

Emissions	tCO <sub>2</sub> e
PK from own mill	N/A
PK from other source	N/A
Fuel Consumptions	N/A
<b>Total Crusher emissions</b>	<b>N/A</b>

\*This mill has no kernel crusher operation.

<b>Palm Oil Mill Effluent (POME) Treatment:</b>	
Divert to Compost (%)	0
Divert to anaerobic diversion (%)	100

<b>POME Diverted to Anaerobic Digestion:</b>	
Divert to anaerobic pond (%)	100
Divert to methane captured (flaring) (%)	0
Divert to methane captured (energy generation) (%)	0



**Appendix D: Supply Chain Declaration**

<b>A. Monthly Records of Certified and Uncertified FFB Received since the last audit</b>				
<b>No.</b>	<b>Month - Year</b>	<b>Volume of FFB from certified supply bases (mt)</b>	<b>Volume of FFB from uncertified supply bases (mt)</b>	<b>Total FFB/Month (mt)</b>
1	Nov 2019	9,672.88	2,656.34	12,329.22
2	Dec – 2019	10,106.40	2,975.34	13,081.74
3	Jan – 2020	12,864.80	3,385.46	16,250.28
4	Feb – 2020	13,322.80	3,099.36	16,422.17
5	Mar – 2020	17,495.20	3,335.10	20,830.3
6	May -2020	20,114.10	3,176.54	23,290.60
7	Apr – 2020	22,249.10	1,325.24	23,574.34
8	June -2020	14,355.10	523.72	14,878.8
9	July -2020	12,787.70	639.1	13,426.77
10	Aug - 2020	14,391.70	890.34	15,282.08
11	Sept – 2020	14,293.10	1,191.98	15,485.12
12	Oct - 2020	11,630.80	1,042.56	12,673.33

<b>B. Monthly Records of Certified CPO &amp; PK since the last audit</b>			
<b>No.</b>	<b>Month - Year</b>	<b>Certified CPO (mt)</b>	<b>Certified PK (mt)</b>
1	Nov 2019	2,145.75	390.02
2	Dec – 2019	2,444.30	418.05
3	Jan – 2020	3,059.47	506.39
4	Feb – 2020	3,469.02	547.18
5	Mar – 2020	4,380.62	696.51
6	May -2020	4,712.59	813.78
7	Apr – 2020	5,319.74	908.18
8	June -2020	3,545.80	584.48
9	July -2020	3,102.31	529.04
10	Aug - 2020	3,387.16	581.21
11	Sept – 2020	3,402.75	579.88
12	Oct - 2020	2,803.26	470.10

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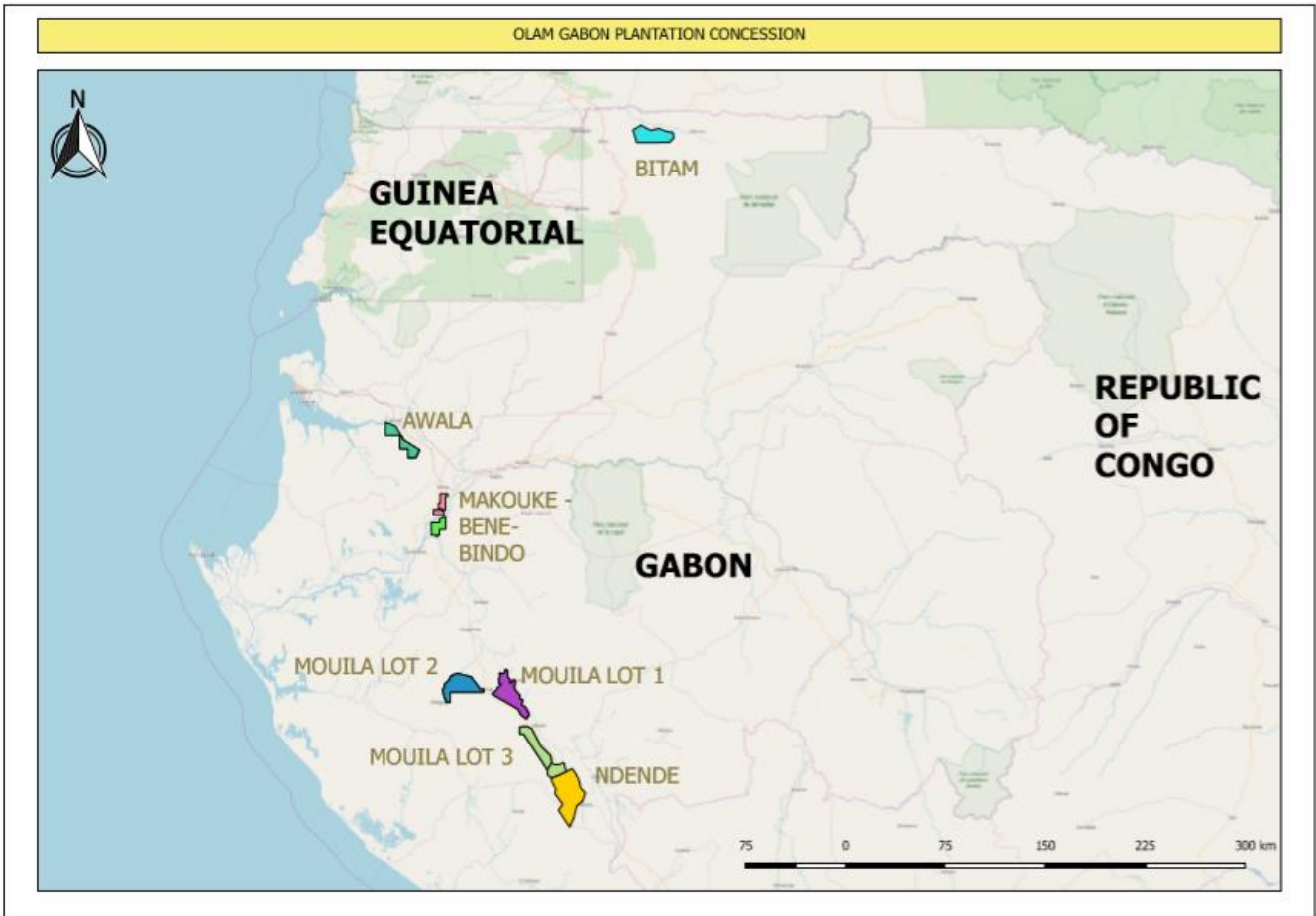
<b>C. Records of Certified CPO &amp; PK Sold under PalmTrace since the last audit (if any)</b>				
No.	Buyers Name	Palmtrace Trading License Number	Certified CPO Sold (mt)	Certified PK Sold (mt)
1	Buyer 1	TR-2c409de6-0c45	3,123.60	0

<b>D. Records of CPO &amp; PK Sold under other schemes since the last audit (if any)</b>				
No.	Buyers Name	Scheme Name	CPO Sold (mt)	PK Sold (mt)
1	Buyer 2	ISCC	5,953.25	0

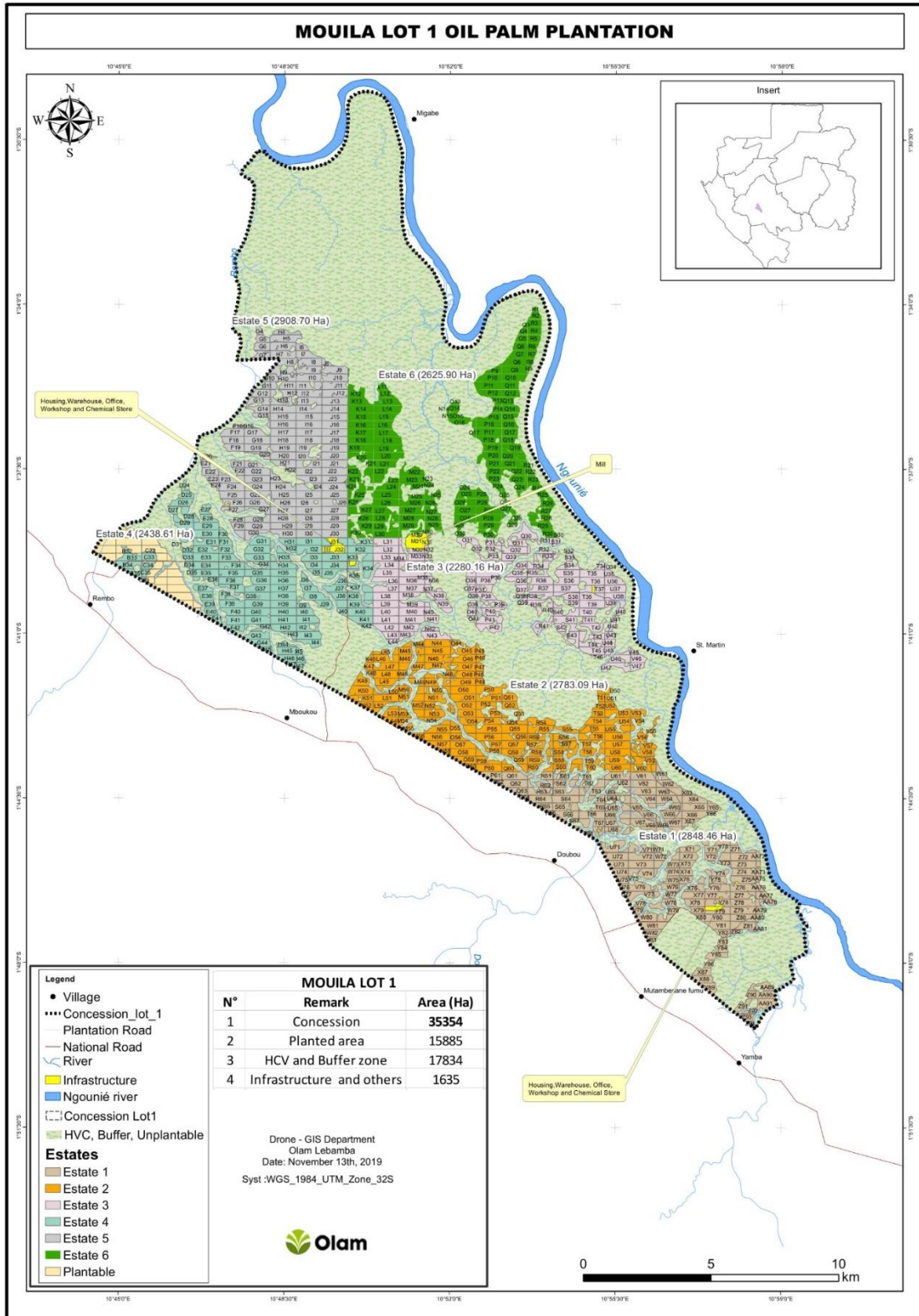
<b>E. Records of CPO &amp; PK Sold as conventional since the last audit (if any)</b>				
No.	Buyers Name	CPO Sold (mt)	PK Sold (mt)	
1	Buyer 3	17,748.30	0	

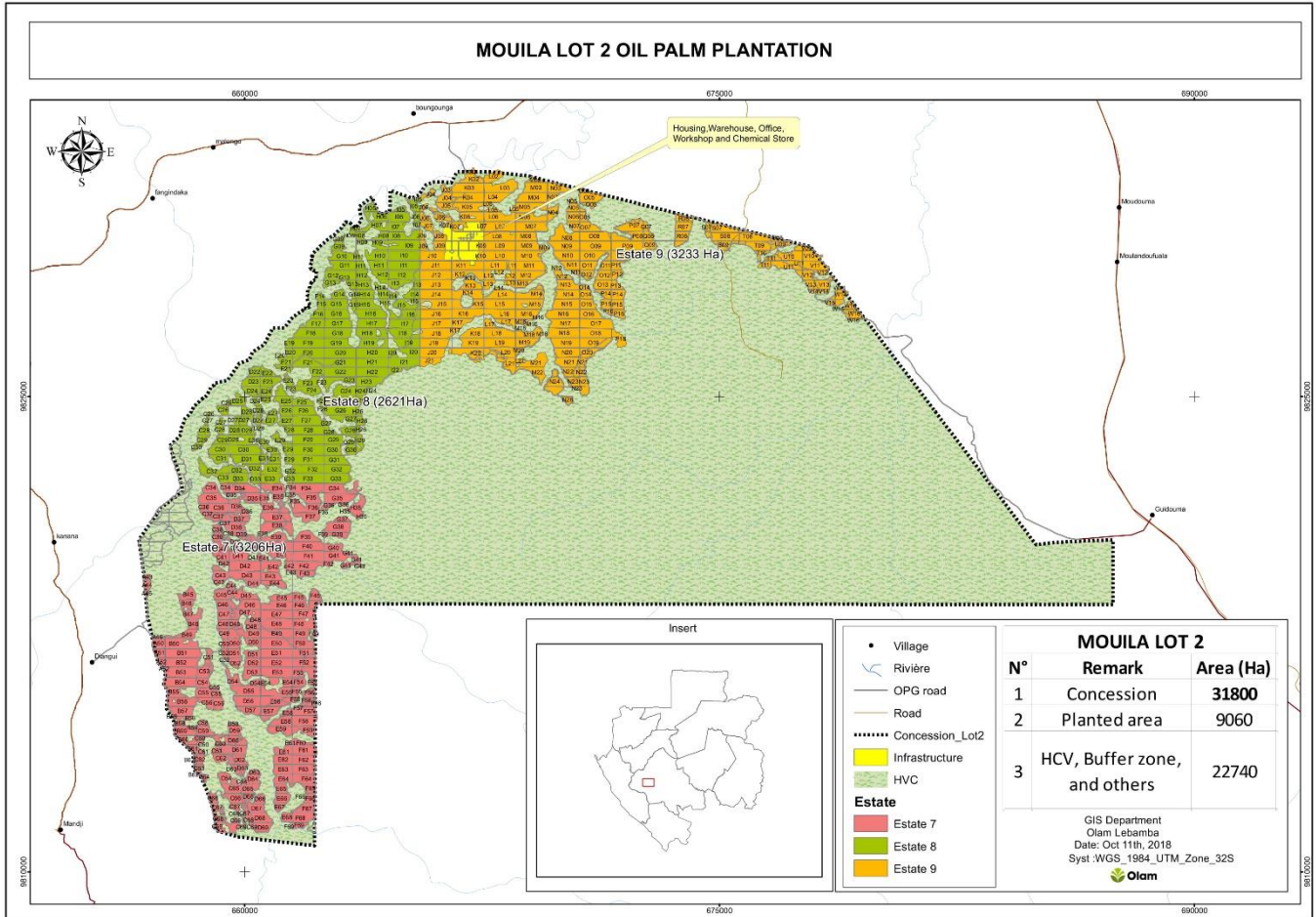
<b>F. Records of Certified CPO Sold under RSPO Credits since the last audit (if any)</b>			
No.	Buyers Name	PalmTrace Trading License Number	RSPO Credits of Certified CPO Sold (mt)
1	Buyer 4	ST-TR-a423b40c-db4c	15,000

**Appendix E: Location Map of Certification Unit and Supply bases**

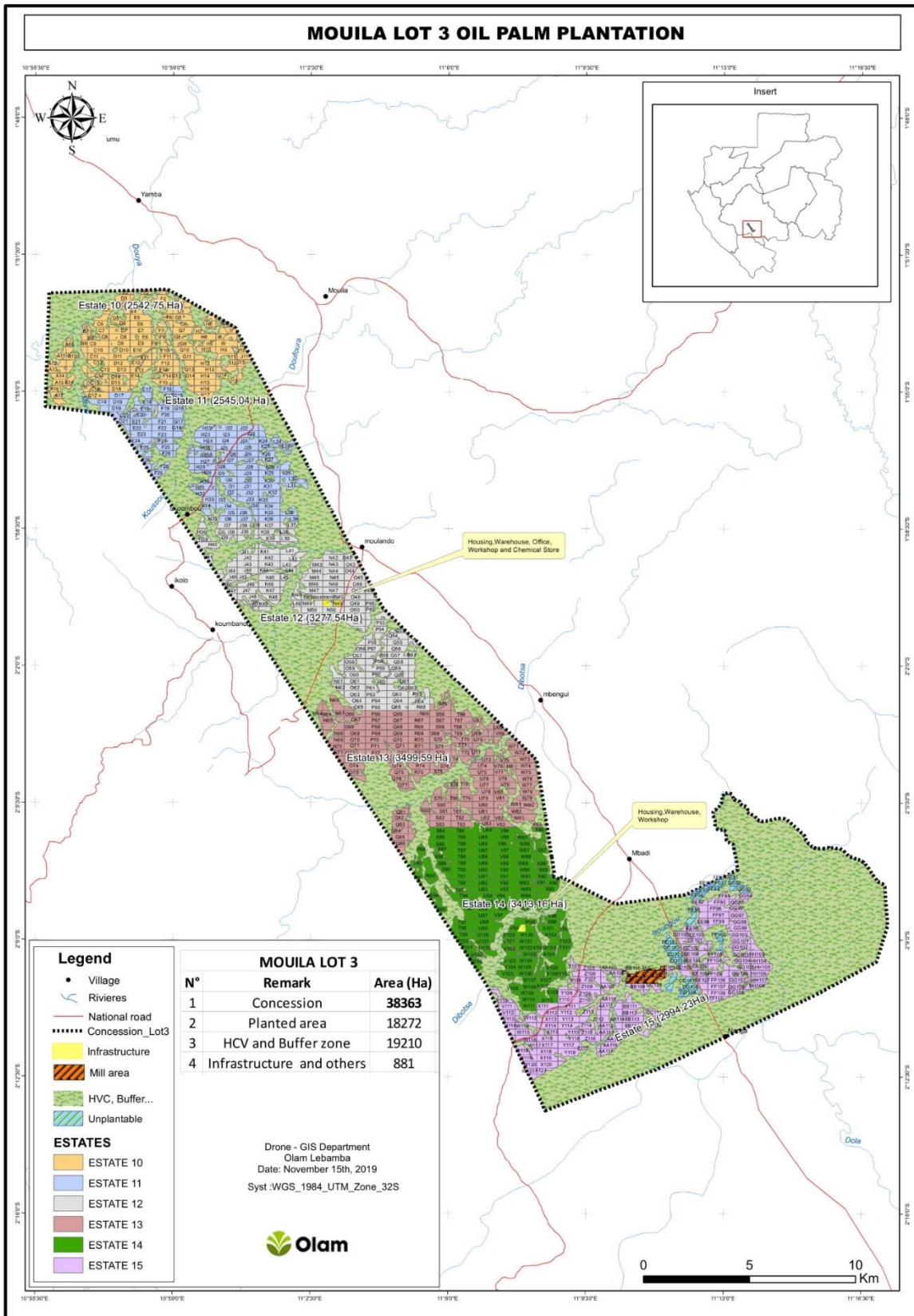


**Appendix F: Estate Field Map**









**Appendix G: List of Smallholder Sampled**

Not Applicable

## Appendix H: List of Abbreviations

a.i	Active Ingredient
BOD	Biochemical Oxygen Demand
CB	Certification Bodies
CHRA	Chemical Health Risk Assessment
COD	Chemical Oxygen Demand
CPO	Crude Palm Oil
CSPO	Certified Sustainable Palm Oil
CSPKO	Certified Sustainable Palm Kernel Oil
EFB	Empty Fruit Bunch
EHS	Environmental, Health and Safety
EIA	Environmental Impact Assessment
EMS	Environmental Management System
FFB	Fresh Fruit Bunch
FPIC	Free, Prior, Informed and Consent
GAP	Good Agricultural Practice
GHG	Greenhouse Gas
GMP	Good Manufacturing Practice
GPS	Global Positioning System
HCV	High Conservation Value
IPM	Integrated Pest Management
IP	Identity Preserved
IS - CSPO	Independent Smallholder Certified Sustainable Palm Oil
IS – CSPKO	Independent Smallholder Certified Sustainable Palm Kernel Oil
IS – CSPKE	Independent Smallholder Certified Sustainable Palm Kernel Expeller
ISCC	International Sustainable Carbon Certification
LD50	Lethal Dose for 50 sample
MB	Mass Balance
MSDS	Material Safety Data Sheet
MT	Metric Tonnes
OER	Oil Extraction Rate
OSH	Occupational Safety and Health
PK	Palm Kernel
PKO	Palm Kernel Oil
POM	Palm Oil Mill
POME	Palm Oil Mill Effluent
PPE	Personal Protective Equipment
RSPO	Roundtable on Sustainable Palm Oil
P&C	Principles & Criteria
RTE	Rare, Threatened or Endangered species
SCCS	Supply Chain Certification Standard
SEIA	Social & Environmental Impact Assessment
SIA	Social Impact Assessment
SOP	Standard Operating Procedure