

**RSPO PRINCIPLE AND CRITERIA
PUBLIC SUMMARY REPORT**

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

Olam International Limited
Client company Address: 9 Temasek Boulevard #11-02 Suntec Tower Two, Singapore
Certification Unit: Olam Palm Gabon SA– Dola Palm Oil Mill
Location of Certification Unit: Mouila Lot 3, National Road N1, Mouila, 241 Ngounie, Gabon
Date of Final Report: 02/06/2022

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Section 1: Scope of the Assessment

1. Company Details			
Parent Company	Olam International Limited		
RSPO Membership Number	1-0114-12-000-00	Membership Approval Date	09/10/2006
Address	9, Temasek Boulevard, #11-02 Suntec Tower Two, Singapore		
Palm Oil Mill / Group Manager / Estate (Certification Unit)	Olam Palm Gabon SA – Dola Palm Oil Mill		
Location / Address	Mouila Lot 3, National Road N1, Mouila, 241 Ngounie, Gabon		
Website	http://olamgroup.com		
Management Representative	Mohammed Dao (Sustainability Manager)	E-mail	mohamed.dao@olamnet.com
Telephone	+24106006178	Facsimile	+24106006178

2. Certification Information			
Certificate Number	RSPO 758488	Certificate Start Date	02/06/2022
Date of First Certification	02/06/2022	Certificate Expiry Date	01/06/2027
Scope of Certification	Production of Palm Oil and Palm Kernel		
Visit Objectives	<p>The objective of Olam Palm Gabon SA –Dola POM Initial Audit was to;</p> <ul style="list-style-type: none"> • Confirm that the elements of the proposed scope of registration and the management system are conforming to the requirements of the assessment standard. • To confirm that the organization has effectively implemented and addressed the management system. • To confirm the ability of the management system is able to meet applicable statutory and regulatory, contractual requirements, organization policies and wherever are applicable. • To identify areas for potential improvement of the management system(s). 		
Assessment Cycle	<input type="checkbox"/> Pre Assessment (Choose an item.) <input checked="" type="checkbox"/> Initial Assessment <input type="checkbox"/> Annual Surveillance Assessment (ASA Choose an item.) <input type="checkbox"/> Recertification Assessment (Choose an item.) <input type="checkbox"/> Scope Extension		
Applicable Standards / Normative Reference	RSPO Certification System for P&C and RSPO ISH 2020 <input type="checkbox"/> Choose an item. <input checked="" type="checkbox"/> Gabon National Interpretation 2020 for RSPO P&C 2018 for the Production of Sustainable Palm Oil		

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Supply Chain Module	<input type="checkbox"/> Identity Preserved; <input checked="" type="checkbox"/> Mass Balance	Mill Capacity	90 MT/hr
ISH certification Phase	<input type="checkbox"/> Eligibility <input type="checkbox"/> Milestone A <input type="checkbox"/> Milestone B <input checked="" type="checkbox"/> Not Applicable		

3. Other Certifications			
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
EU-ISCC-Cert-DE11924207028	ISCC EU	ASG Cert	26/06/2022

4. Location(s) of Mill & Supply Bases			
Name (Mill / Supply Base / Group Manager / Smallholders)	Location	GPS Coordinates	
		Latitude	Longitude
Dola Palm Oil Mill	Mouila Lot 3, National Road N1, Mouila, 241 Ngounie, Gabon	02°09'59.2" S	11°10'40.08" E
Estate 10 (Lot 3 Plantation)	Mouila Lot 3 Estate and Infrastructure Map	1°54'01.85" S	10°58'47.96" E
Estate 11 (Lot 3 Plantation)	Mouila Lot 3 Estate and Infrastructure Map	1°57'00.94" S	11°00'37.13" E
Estate 12 (Lot 3 Plantation)	Mouila Lot 3 Estate and Infrastructure Map	2°00'18.42" S	11°02'50.07" E
Estate 13 (Lot 3 Plantation)	Mouila Lot 3 Estate and Infrastructure Map	2°04'28.60" S	11°07'08.88" E
Estate 14 (Lot 3 Plantation)	Mouila Lot 3 Estate and Infrastructure Map	2°08'39.26" S	11°07'48.17" E
Estate 15 (Lot 3 Plantation)	Mouila Lot 3 Estate and Infrastructure Map	2°10'01.76" S	11°10'38.13" E
Estate 16 (Ndende Plantation)	Mouila Ndende Estate and Infrastructure Map	2°16'19.64" S	11°12'47.50" E
Estate 17 (Ndende Plantation)	Mouila Ndende Estate and Infrastructure Map	2°18'59.22" S	11°15'19.13" E
Estate 18 (Ndende Plantation)	Mouila Ndende Estate and Infrastructure Map	2°20'48.27" S	11°13'20.61" E

5. Description of Supply Base					
New Planting Development	<input checked="" type="checkbox"/> No (no change in total planted area)		<input type="checkbox"/> Yes (please refer to Principle 7 for details)		
Estate / Smallholders	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted
Mouila Lot 3 Plantation	18,272	18,765	1,325	38,362	47.63%
Ndende Plantation	7,531	1,969	48,900	58,400	12.90%
Total	25,803	20,734	50,225	96,762	26.82%

Note: *HCV and Infrastructure figure were obtained as a whole for the plantations and not by estate

6. Plantings & Cycle							
Estate / Smallholders	Age (Years)					Mature	Immature
	0 - 3	4 - 10	11 - 20	21 - 25	26 - 30		
Estate 10 (Lot 3 plantation)	-	2,543	-	-	-	2,543	-
Estate 11 (Lot 3 plantation)		2,545	-	-	-	2,545	-
Estate 12 (Lot 3 plantation)	-	3,278	-	-	-	3,278	-
Estate 13 (Lot 3 plantation)	-	3,500	-	-	-	3,500	-
Estate 14 (Lot 3 plantation)	-	3,413	-	-	-	3,413	-
Estate 15 (Lot 3 plantation)	-	2,994	-	-	-	2,994	-
Estate 16 (Ndende Plantation)	-	2,537	-	-	-	2,537	-
Estate 17 (Ndende plantation)	-	2,536	-	-	-	2,536	-
Estate 18 (Ndende plantation)	-	2,457	-	-	-	2,457	-
Total (ha)	-	25,803	-	-	-	25,803	-

7. Summary of Certified Tonnage of FFB (Own Certified Scope)				
Estate / Smallholders	Tonnage / year			
	Estimated last year	Actual		Forecast (May 2022 – Apr 2023)
		Previous license period	Current license period	
Estate 10 (Lot 3 plantation)	NA	NA	NA	18 304
Estate 11 (Lot 3 plantation)	NA	NA	NA	20 285
Estate 12 (Lot 3 plantation)	NA	NA	NA	35 503
Estate 13 (Lot 3 plantation)	NA	NA	NA	29 419
Estate 14 (Lot 3 plantation)	NA	NA	NA	27 005
Estate 15 (Lot 3 plantation)	NA	NA	NA	15 174
Estate 16 (Ndende Plantation)	NA	NA	NA	22 265
Estate 17 (Ndende plantation)	NA	NA	NA	19 407
Estate 18 (Ndende plantation)	NA	NA	NA	17 876
Total				205,238
Note:				

8. Summary of Certified Tonnage of FFB (from other certified unit(s))				
Estate / Smallholders	Tonnage / year			
	Estimated last year	Actual		Forecast
		Previous license period	Current license period	
N/A	N/A	N/A	N/A	N/A
Total	N/A	N/A		N/A

9. Summary of Non-Certified Tonnage of FFB (outside supplier – excluded from certificate)				
Out growers / smallholders	Tonnage / year			
	Estimated last year	Actual		Forecast
		Previous license period	Current license period	
N/A	N/A	N/A	N/A	N/A
Total	N/A	N/A		N/A

9A. Monthly Records of Certified and Uncertified FFB Received since the last audit				
No.	Month - Year	Volume of FFB from certified supply base (mt)	Volume of FFB from uncertified supply base (mt)	Total FFB/Month (mt)
1	N/A	N/A	N/A	N/A
TOTAL		N/A	N/A	N/A

10. Summary of Certified Tonnage (not applicable for ISS)				
Estimated last year	Actual		Forecast (May 2022 – Apr 2023)	
	Previous license period	Current license period		
FFB	FFB		FFB	
N/A	N/A	N/A	205,238 mt	
CPO (OER: %)	CPO (OER: %)		CPO (OER: 24%)	
N/A	N/A	N/A	49,257.12 mt	
PK (KER: %)	PK (KER: %)		PK (KER: 4%)	
N/A	N/A	N/A	8,209.52 mt	

10A. Monthly Records of Certified CPO & PK since the last audit			
No.	Month - Year	Certified CPO (mt)	Certified PK (mt)
1	N/A	N/A	N/A
TOTAL		N/A	N/A

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11. Summary of Actual Volume sold					
Current License period					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	Others		
CPO (MT)	N/A	N/A	N/A	N/A	N/A
PK (MT)	N/A	N/A	N/A	N/A	N/A
Credits	N/A	N/A	N/A	N/A	N/A
Previous License period					
CPO (MT)	N/A	N/A	N/A	N/A	N/A
PK (MT)	N/A	N/A	N/A	N/A	N/A
Credits	N/A	N/A	N/A	N/A	N/A

11A. Records of Certified CPO & PK Sold under PalmTrace since the last audit (if any)				
No.	Buyers Name	Palmtrace Trading License Number	Certified CPO Sold (mt)	Certified PK Sold (mt)
	N/A	N/A	N/A	N/A
TOTAL			N/A	N/A

11B. Records of CPO & PK Sold under other schemes since the last audit (if any)				
No.	Buyers Name	Scheme Name	CPO Sold (mt)	PK Sold (mt)
	N/A	N/A	N/A	N/A
TOTAL			N/A	N/A

11C. Records of CPO & PK Sold as conventional since the last audit (if any)			
No.	Buyers Name	CPO Sold (mt)	PK Sold (mt)
	N/A	N/A	N/A
TOTAL		N/A	N/A

11D. Records of Certified CPO Sold under RSPO Credits since the last audit (if any)			
No.	Buyers Name	PalmTrace Trading License Number	RSPO Credits of Certified CPO Sold (mt)
	N/A	N/A	N/A

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TOTAL	N/A
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12. Independent Smallholders Certified Tonnage / Volume									
	Estimated last year			Actual			Forecast		
Phase	Eligibility	MS A	MS B	Eligibility	MS A	MS B	Eligibility	MS A	MS B
	40%	70%	100%	40%	70%	100%	40%	70%	100%
FFB			N/A			N/A			N/A
IS-CSPO	N/A	N/A		N/A	N/A		N/A	N/A	
IS-CSPKO	N/A	N/A		N/A	N/A		N/A	N/A	
IS-CSPKE	N/A	N/A		N/A	N/A		N/A	N/A	

13. Independent Smallholders Actual Sold Tonnage / Volume						
	FFB	FFB Conventional	FFB Other schemes	IS-CSPO	IS-CSPK	IS-CSPKE
Current License period						
Credits				N/A	N/A	N/A
Physical	N/A	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)
Website: www.bsigroup.com

BSI is a leading global provider of management systems assessment and certification, with more than 92,000 certified locations and clients in over 193 countries. BSI 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 29th November to 03rd December 2021. The audit programme is included as Section 2.3. Prior to the initial certification audit, 30 days Public Notification was made through the RSPO and BSI website on 14/10/2021: ([P&C Assessment Public Announcement | RSPO - Roundtable on Sustainable Palm Oil](#))

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 01/03/2022. 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 2019 of the RSPO P&C 2018 was used as the normative reference to assess compliance. The comments made by external stakeholders were also taken into account in the assessment.

The minimum sample size is four estates. Sample size for certification unit with more than four (4) estates were determined based on formula $N = (\sqrt{y}) \times (z)$ where y is the number of estates and where z is the multiplier defined by risk assessment. While, the sampling of smallholders were based on the formula $(\sqrt{y}) \times (z)$; where y is total number of group member and where z is the multiplier defined by the risk assessment. The sampled smallholder listed in Appendix E.

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 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 3.4.

The non-conformities for this audit are detailed in Section 3.3 and unless it is stated in this section, all previous nonconformities including minor nonconformities are remains closed.

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This report is structured to provide a summary of assessment finding as provided in Appendix A. The assessment was conducted based on risk based approach sampling and therefore nonconformities may exist.

For Initial, Re-certification and Extension of Scope assessment, the report was externally reviewed by approved external peer 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

Assessment Program					
Name (Mill / Supply Base)	Year 1 (Certification)	Year 2 (ASA 1)	Year 3 (ASA 2)	Year 4 (ASA 3)	Year 5 (ASA 4)
Dola Palm Oil Mill	√	√	√	√	√
Estate 10 (Lot 3 Plantation)	√				√
Estate 11 (Lot 3 Plantation)		√			√
Estate 12 (Lot 3 Plantation)			√		√
Estate 13 (Lot 3 Plantation)			√	√	
Estate 14 (Lot 3 Plantation)		√		√	
Estate 15 (Lot 3 Plantation)		√		√	
Estate 16 (Ndende Plantation)	√		√		
Estate 17 (Ndende Plantation)	√		√		√
Estate 18 (Ndende Plantation)	√	√		√	

Tentative Date of Next Visit: November 29, 2022 - December 3, 2022

Total Number of Mandays: 20

2.2 BSI Assessment Team

Name	Role	Competency
Dennis Acquah (DA)	Team Leader	<p>Education: Holds a BSc. in Natural Resource management with specialization in Forestry from Kwame Nkrumah University of Science and technology, Kumasi, Ghana; MSc in logistic and Supply Chain Management from Kwame Nkrumah University of Science and technology, Kumasi, Ghana.</p> <p>Work Experience: Currently work as a Project Coordinator (Forest and Biodiversity). Also experienced in implementing forest governance project, building relations, and sustaining communications with forest communities, acting as resource person for awareness and training activities and engaging government towards policy reforms. He has 14 years of experience as an Operation Managers having worked with two of the leading timber processing industries in Ghana.</p>

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		<p>Training attended: Successfully completed the RSPO P&C 2018 Lead Auditor Course; RSPO SCCS Lead Auditor Course, SA 8000, ISO 9001:2015, ISO 45001:2018, FSC Forest management/CoC Lead Auditor Course, Rain Alliance Sustainable Agriculture Standard (RA SAS) Farm/CoC Lead Auditor Course. Have has also participated in ESIA and SEA trainings</p> <p>Aspect covered in this audit: Occupational health and safety, operation procedure, organization commitments, legal compliance, long term economy plan, continuous improvement time bound plan, supply chain for mill</p> <p>Language proficiency: English</p>
Aimé Fulgence (AFG)	Team Member	<p>Education: He obtained qualification in Vocational Bachelor in Quality Control and Environment Management, ESTC, Abidjan (2018), Vocational training Certificate in cooperation, specialised in Cooperative management, Ecole Régionale d’Agriculture du Sud (ERA Sud Bingerville), Abidjan (2010), Marketing-Communication and Advertising Design Engineer, Institut des Technologies d’Abidjan (2009), Marketing-Communication and Advertising Techniques Engineer, Institut des Technologies d’Abidjan (2008), Bachelor of Arts in literature, specialised in English, Université de Cocody, Abidjan (2005), HND in Human Resources Management and Corporate Communication, ESSECT Henri Poincaré, Abidjan (2005), and Baccalauréat in Literature, Lycée Moderne d’Aboisso, Aboisso (2002).</p> <p>Work Experience: Experience in social audit, sustainable agriculture, and certification of agricultural production systems.</p> <p>Training attended: Successfully completed the ISO 9001 Lead Auditor Course, Endorsed RSPO P&C Lead Auditor Course, Child Labor Centered Due Diligence Process / Abidjan, and Gender workshop for Associated trainers / Abidjan.</p> <p>Aspect covered in this audit: Policy and commitment, Social requirements, contract agreement, human rights, welfare, Stakeholder Consultation, Legal Requirements, land & Legal issue. Fluent in French and English.</p> <p>Language proficiency: Fluent in French and English</p>
John Manyitabot Takang (JT)	Team Member	<p>Education: Holds a Bsc. in Environmental and Resource Management and MSc. in Environmental Sciences from the University of Cologne, specializing in environmental law and governance.</p> <p>Work Experience: He was a Resident Scholar at the United Nations University’s International Human Dimensions Programme on Global Environmental Change (UNU-IHDP) in Bonn-Germany. John has also served at the International Forest Policy Unit, in the Department of Natural Resources Governance and Climate Change of the German Technical Cooperation (GIZ). He was the Academic</p>

		<p>Officer of the International Master of Environmental Sciences (IMES) Programme at the University of Cologne, where he equally taught classes in international environmental law. Additionally, he has taught classes in international environmental law in the Technology and Resources Management master study programme offered at the Institute for Technology and Resources Management in the Tropics and Subtropics of Cologne University of Applied Sciences. John is involved in a number of governance initiatives. Among others, he is a Fellow of the African Good Governance Network (AGGN). Since 2011, he is founding Executive Director of the Environmental Governance Institute (EGI), where he is engaging in the conception and implementation of a wide range of projects including, policy, development, renewable energies, sustainable agriculture among other.</p> <p>Training attended: Successfully completed the RSPO P&C 2018 Lead Auditor Course, ISO 14001:2015 Lead Auditor Course (attended), RSPO Smallholder Academy (Partner to the Academy) and training in HCV/HCS.</p> <p>Aspect covered in this audit: Best Management Practice for Mill and Estate, environment aspect, GHG & HCV, Fluent in English.</p> <p>Language proficiency: Fluent in French and English</p>
<p>Dr Suhaili Sahari</p>	<p>Peer Reviewer</p>	<p>Education: Graduated from University Technology Mara (UiTM), Malaysia in Diploma in Science in 1990. He furthers his first degree in B.Sc (Hons) in Chemistry with Industrial Chemistry in 1995 from Liverpool University, England. He later advances his study in Master in Business Administration (General) in 2002 and graduated in 2005 from University of Multimedia, Malaysia. Completed his PhD from University Science Islam Malaysia (Faculty of Economy and Muamalat - Management) under the supervision of previous University Vice Chancellor Dato' Mohd Muda.</p> <p>Work Experience: Worked with Hong Leong Group of Companies as a production executive cum TQM facilitator and continues to advance in his career as a manager and senior manager in management, production, training and quality for more than 11 years. During his tenure with Hong Leong Group of Companies, he heavily involved in strategic management decision issues such as developing SWOT analysis, Vision, Mission, Business and Corporate Strategy formulation, Acquisition and restructuring strategies. Strategic actions and implementation etc. Then he joint Kumpulan Guthrie and Sime Darby Group of Companies for more than 7 years as a manager, heads of department and Assistant Vice President in management, quality and training. Part of his duty is to strategies the departmental vision; mission, critical success factors and action plan into actions and support the corporate strategic plan.</p> <p>Training attended:</p> <ol style="list-style-type: none"> 1. ISO 9001:2015 Lead Auditor and Internal Auditor 2. Occupation Health and Safety Training 3. ISO 14001:2015 Standard 4. ASI Peer reviewer Training

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		5. RSPO Standards: RSPO P&C 2018 MY-NI 2019 6. MSPO Standards: MS 2530: 2013 part 1, 2 , 3 and 4 7. Problem Solving Technique: 8 D, ICC, QCC, Systematic PS 8. HACCP MS 1480:2019 9. GAP Standard: GLOBALG.A.P., Euro GAP
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Accompanying Persons:

Name	Role
Gueye Sarah MASSOLOU	Translator/Technical Expert
Muhammad Fadzli bin Masran	Auditor Mentor
Mohammed Hidhir	Auditor Mentor

2.3 Assessment Plan

The Assessment plan was sent to the client prior to the assessment.

Date	Time	Subjects	DA	JT	AFG	SMG
Sunday 28/11/2021	All Day	Audit Team arrives from Dola site	√	√	√	√
DAY 1 Monday 29/11/2021	0800hrs To 0900hrs Main Office	Opening Meeting with Dola Management Team and staff to include: Introductions, updates from Dola Management; review audit scope, Finalise audit plan, Any introduction and updates to RSPO and BSI standards and protocols.	√	√	√	√
	0900hrs to 1200hrs	Document Review related to Legal compliance (2.1), Third party contractors legal (2.2), Third party FBB legally sourced (2.3), Long term plan and economic viability (3.1), Continuous Improvement & Reporting – RSPO Metrics (3.2), SOPs (3.3), Occupational Health and Safety Plan (3.6), Training (3.7), Supply Chain (3.8), Improved SH livelihoods (5.1), SH Pay and working conditions (5.2), Safe working environment 6.7,	√			√
	0900hrs to 1200hrs	Document Review related SEIA and Plans (3.4), Effective Integrated Pest Management (7.1), Pesticide Use (7.2), Waste management (7.3), Soil health fertility (7.4), Soil conservation (erosion and degradation) (7.5), Soil survey and topographic information (7.6), Peat (7.7), Water quality and quantity (7.8), Energy Use (7.9), Pollution and GHGs – Palm GHG (7.10) Fire (7.11), and HCV and HCS (7.12)		√		

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Date	Time	Subjects	DA	JT	AFG	SMG
	0900hrs to 1200hrs	Document Review related to Information and public availability, Communication and consultation (1.1), Commitment to ethical conduct (1.2), System for managing human resources (3.5), Human Rights (4.1), Complaints and Grievances systems (4.2), Contribution to local development (4.3), Land use & FPIC (4.4 & 4.5), Land Use: Compensation (4.6 & 4.7), Land Use: Conflict (4.8), No discrimination (6.1), Staff and Workers Pay and working conditions (6.2), Freedom of association (6.3), No child labour (6.4), No harassment (6.5), No forced or trafficked labour 6.6,			√	
	1200hrs to 1330hrs	Lunch	√	√	√	√
	1330hrs To 1600hrs	Document Review continues Stakeholder consultations <ul style="list-style-type: none"> Moutassou, Mbadi, Ferra, Mounigou, Canton Dola Nord Préfet Dola C.C Eaux et Foret Dola (Ndende) 	√	√	√	√
	1600hrs to 1630hrs	Audit Team Meets to consolidate day's findings	√	√	√	√
	1630hrs to 1700hrs	Debriefing of days findings to Management and ends the day's work	√	√	√	√
DAY 2 Tuesday 30/11/2021	0800hrs To 1200hrs Ndende Estate 16 & 17	Field verification <ul style="list-style-type: none"> Best agricultural practices Manuring, Spraying, Harvesting HCV / Conservation Area Legal compliance / boundary Chemical / Pesticide / PPEs, Pesticide and Fertilizer Stores /Change rooms Workers interviews (including worker's rights, issues, wages, conditions) 	√	√	√	√
	1200hrs	Lunch				
	1330hrs to 1600hrs	Document Review Continues <ul style="list-style-type: none"> Worker's facilities (housing, clinic, school etc) Stakeholder consultations <ul style="list-style-type: none"> Workers Representatives 			√	√

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	1600hrs to 1630hrs	Audit Team Meets to consolidate day's findings	√	√	√	√
	1630hr to 1700hrs	Debriefing of days findings to Management and ends the day's work	√	√	√	√
DAY 3 Wednesday 01/12/2021	0800hrs To 1200hrs	Field verification <ul style="list-style-type: none"> • Best agricultural practices • Manuring, Spraying, Harvesting • HCV / Conservation Area • Legal compliance / boundary • Chemical / Pesticide / PPEs, Pesticide and Fertilizer Stores /Change rooms Workers interviews (including worker's rights, issues, wages, conditions)	√	√		√
	1200hrs	Lunch				
	1330hrs to 1600hrs	Document Review Continues <ul style="list-style-type: none"> • Worker's facilities (housing, clinic, school etc) Stakeholder consultations <ul style="list-style-type: none"> • Labour Contractors • Gender Committee 	√		√	√
	1600hrs to 1630hrs	Audit Team Meets to consolidate day's findings	√	√	√	√
	1630hr to 1700hrs	Debriefing of days findings to Management and ends the day's work	√	√	√	√
	DAY 4 Thursday 02/12/2021	0800hrs To 1200hrs	Field verification <ul style="list-style-type: none"> • Best agricultural practices • Manuring, Spraying, Harvesting • HCV / Conservation Area • Legal compliance / boundary • Chemical / Pesticide / PPEs, Pesticide and Fertilizer Stores /Change rooms Workers interviews (including worker's rights, issues, wages, conditions)	√	√	
1200hrs		Lunch				
1330hrs to 1600hrs		Document Review Continues <ul style="list-style-type: none"> • Worker's facilities (housing, clinic, school etc) Stakeholder consultations	√	√	√	√
		(To Be Confirmed)	√		√	√

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Date	Time	Subjects	DA	JT	AFG	SMG	
	1600hrs to 1630hrs	Audit Team Meets to consolidate day's findings	√	√	√	√	
	1630hr to 1700hrs	Debriefing of days findings to Management and ends days' work	√	√	√	√	
DAY 5 Friday 03/12/2021	0800hrs to 1200hrs	Supply Chain for the POM (3.8) • Demonstration of legal entity • Roles and responsibility and ICS • Procedures/manual/SOP • Record of purchase – • Record of sales– • RSPO rules on market communication and claims	√ √ √ √ √ √ √			√ √ √ √ √ √ √	
	Mill	Mill Walk through and inspection: ▪ Workshops, Stores and POM application, ▪ Mill Safety and Health / PPE / Signage, Waste Management / Environment	√	√ √	√	√	
	1200hrs	Lunch					
	1330hrs to 1500hrs	Closing Meeting Preparation: Auditors consolidate notes and confirm audit findings	√	√	√	√	
	1500hrs to 1600hrs	Pre-Closing Meeting and Review of Findings: Convene with Management and Sustainability Team to discuss audit findings and potential non-conformities	√	√	√	√	
	1600hrs to 1700hrs	Closing Meeting and End of Audit Convene with all relevant staff to summarize audit findings, potential non-conformities and next steps	√	√	√	√	
	NC Closure Plan:						
	Saturday 04/12/2021		Audit Team departs for Libreville	√	√	√	√
27/02/2022	All Day	Audit Team travels to Gabon for onsite NC closure assessment	√				
28/02/2022	All Day	Audit Team travels to at Dola site	√			√	
01/03/2022	0800hrs to 1600hrs	Opening meeting, Documents review, Stakeholder engagements, Estate visit Closing Meeting	√			√	
02/03/2022	All Day	Audit Team departs from Libreville	√			√	

Section 3: Assessment Findings

3.1 Multiple Management Units and Time Bound Plan

Requirement	Assessment	Compliance
Does the time bound plan include all current subsidiaries, estates and mills that is under the control and/or minor shareholding of the holding company?	Olam Palm Gabon has a Time Bound Plan and it includes all of its management units and mills.	Complied.
Have all the estates and mills certified within five (5) years after obtaining RSPO membership?	All units of OPG has been certified. The last on the plan is Graine (Ndende) which just went through its initial audit as indicated on the plan	Complied
Have there been any new acquisitions? If yes, the new acquisitions shall be certified within three (3) years from the date of acquisition. Certification plan for the new acquisition shall be available. <i>Note:</i>	All units have been certified in line with the plan. Graine (Ndende) which is schedule for certification in 2021 has just conducted its initial audit	Complied
Any deviations from the maximum periods requires approval by the RSPO Secretariat.	Review of the plan does not show any deviation as the estates and mills have been certified as scheduled.	Complied
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?	There has not been any changes to the plan and this is consistent with the ACOP reporting 2020	Complied
Have there been any isolated lapses in implementation of the plan? If yes a Minor non-compliance shall be raised	No isolated lapses identified in the implementation of the plan	Complied
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 Major non-compliance shall be raised	No fundamental failures in the implementation of the plan. The assessment has been carried out as planned	Complied
Un-Certified Units or Holdings		
No replacement of primary forest or any area required to maintain or enhance HCVs and HCS in accordance with RSPO P&C criterion 7.12.	All management units are fully gone through the RSPO NPPs and it includes no replacement of primary forest and HCV assessments.	Complied
Any new plantings since January 1 st 2010 shall comply with the RSPO New Plantings Procedure.	All management units are fully complying to the RSPO NPPs and complete public consultation, information is available on the RSPO NPP website and Olam website: Palm Plantations (olamgroup.com)	Complied
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 4.4, 4.5, 4.6, 4.7 and 4.8.	No land dispute recorded at the time of the audit and also a review of the RSPO Tracker did not identify any liabilities	Complied

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Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 4.2	No land dispute recorded at the time of the audit	Complied
Any Legal non- compliance is being addressed through measures consistent with the requirements of RSPO P&C criteria 2.1	There were no legal non-compliance at the time of the audit	Complied
Did the company conduct internal audit for those uncertified estates against the uncertified management units requirement and covering the RSPO P&C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12? If yes, a positive assurance statement shall be available and justified.	All management units of Olam Palm Gabon were certified at the time of the audit	Complied
Are there any Critical (Major) non-compliance raised against any of the RSPO P&C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12 during the last internal audit of the uncertified estates? If yes is the NC(s) actively addressed with RSPO?	All units were certified at the time of this audit	Complied
Have there been any stakeholder (including NGO) consultation conducted?	Stakeholders were consulted during the HCV assessment and also during this audit	Complied

3.2 Progress of scheme smallholders and/or outgrowers

Progress of scheme smallholders or outgrowers towards compliance with relevant standards		
Requirement	Remarks	Compliance
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.	There are no scheme smallholders in OPG operations	Complied

Approved Time Bound Plan

		2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022
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									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					

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	Mill commissioned										Dec 20		
	RSPO initial certification							Dec 18					
	RSPO surveillance audit												
Makouke	Inclusion under Olam RSPO membership					Aug 16							
	RSPO initial certification								July 19				
	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										Dec 21		
	100% certification of GRAINE Palm SH												Apr 2022

3.3 Details of Nonconformities

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

During this Assessment there were three (3) Critical; eight (8) Minor nonconformities and three (3) Opportunity For Improvement raised. The Olam Palm Gabon SA-Dola Palm Oil Mill 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 its effectiveness and closed accordingly. The below is the summary of the non-conformity raised during this assessment.

Non-conformity			
NCR Ref #	2140615-202111-M1	Date Issued	03/12/2021
Due Date	02/12/2022	Date of nonconformity Closure	01/03/2022
Clause & Category (Critical / Minor)	3.6.1 Critical		
Statement of Nonconformity:	The risk assessment report does not include the risk associated with Covid 19 and sample vehicles used for the transportation of workers and other operational activities does not have warning triangles in them		
Requirement Reference:	All operations are risk assessed to identify H&S issues. Mitigation plans and procedures are documented and implemented		
Objective Evidence:	<p>The company has a documented risk assessment report which cover all the activities in their operations to include harvesting, chemical spraying, transportation, land preparation and boiler operations. However, the plan does not include the risk associated with Covid-19.</p> <p>Also during a visit to estate 17, block L58 where semi mechanical spraying was being done, using tractors. It was established during interview with the tractor driver that there was no warning triangles in the tractors for use in case of a breakdown. This same incident was recorded in estate 10, 17 when the driver for the vehicle for transporting workers was asked about the warning triangles for the vehicle</p>		
Corrections:	<ol style="list-style-type: none"> 1- Share with auditor the valid version of the risk assessment 2- Provide all safety items to all OPG vehicles (Light and heavy Vehicles) 3- Send a formal letter with acknowledgment to all contractors informing them to have at all times all necessary equipment (first aid kit, fire extinguisher, Triangle) into their vehicle. 		
Root Cause Analysis:	<ol style="list-style-type: none"> 1- No proper system in place to check the valid document (Valid version) 2- Tractors and others heavy machines are used only internally (field operations) and are not going outside the concession. In case of breakdown of vehicle, the existing risk assessment is focused only on vehicles using national road like light vehicles and workers transportation trucks. 3- OPG has a monitoring and control system in place to check warning triangle and other safety items/equipment for all truck but the truck owners use to borrow from other vehicle to show during OPG check/inspection. 		

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Corrective Actions:	<p>1- Check in yearly basis all the E&S documents in term of applicable version</p> <p>2- Update the risk assessment to cover heavy machines (working only in the concession) in case of breakdown</p> <p>3- During E&S controls and inspections, all trucks without safety items/equipment will be denied for the operations with issuance of a warning letter to the owner.</p>
Assessment Conclusion:	<p>The company presented the valid version of the risk assessment to the audit team for review. The document is titled 'Registre De l'analyse des Risques Sur la Sante Et la Secutite Au travail' last updated on the 30/01/2020 and signed by the Director General (OPG Mouila). The document was updated to include the risk associated Covid 19 pandemic. Field visit to Estate 10 (block 15) and interview with 17 fertilizer applicators and also estate 11 (block C18) and interview with five harvesters indicates there has been awareness programmes organised by the company to sensitize the workers on the pandemic.</p> <p>The audit team also reviewed letters sent to the various transport operators on the 14/01/2022 concerning the required safety items in their vehicles. The letter is captioned Commitment to Comply with Olam Road Safety Instruction/Policy and in it the contractors committed to always have in the vehicles the following documents and equipment; Driver's license, Personal Transport Insurance, Warning triangle (2), First aid kit, Fire extinguishers (6 kg) and a failure to comply will be met with sanction by Olam. Sampled letters reviewed have been duly signed by the contractors. The audit team also reviewed quotations and purchase orders for warning triangles and other items for the vehicles. During field visits by the audit team, sampled workers buses (BX 742 AA, BA 078 AA, CF 456 AA) inspected were found to be equipped with the necessary safety items including warning triangles, fire extinguishers and first aid kits</p> <p>Based on the information provided, the NC is duly closed</p>

Non-conformity			
NCR Ref #	2140615-202111-M2	Date Issued	03/12/2021
Due Date	02/12/2022	Date of nonconformity Closure	01/03/2022
Clause & Category (Critical / Minor)	6.2.1 Critical		
Statement of Nonconformity:	The job category of some workers are not found in the company's documented list of Job categorisation		
Requirement Reference:	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.		
Objective Evidence:	The company has a list of job categories from workers employed are placed and also indicate the salary for each category. The document was made available for review. It was observed during review of the category list that some workers has been assigned categories that do not exist in the list. For instance the job category for Human Resource assistant is OE6 on the company's Job categorization list. However, a review of the payroll showed the assigned category for the Human		

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	<p>Resource Assistant (046980) is OE7 which is not found in the List of Job Categorization.</p> <p>Similarly, during interview at the workshop a worker has his job description as a storekeeper under category OE3 (with accompanying salary)which does not exist on the List of Job Categorization and he is actually performing task under category OE5</p> <p>The audit team also came across a case of a workers (with registration 019450) who has serves more than six months on probation as against the required one month for agricultural workers in compliance with the Gabon Labour Act -49.</p>
<p>Corrections:</p>	<ol style="list-style-type: none"> 1. Amend the job category of the Human Resource assistant to reflect the existing job categorization (Completion of the correction after finalisation of collective agreement in May 2022) 2. Confirm the assistant storekeeper as full Storekeeper (Confirmation letter as evidence) 3. Confirm the workers with ID 019450 at the security department (Confirmation letter as evidence)
<p>Root Cause Analysis:</p>	<ul style="list-style-type: none"> • SOTRADER (was a public-private partnership between the Government of Republic of Gabon and Olam International) was previously completely autonomous in regard of Olam Palm Gabon (OPG) and used to define its own job categorization which were sometimes different of OPG’s one. Now SOTRADER is 100% under OPG but the previous job categories and job title have not been updated • Regarding the workers having more than 6 months in probation, the main cause is the miscommunication between security and HR department. Indeed, the worker has been sent upon request of security department for a probation period but at the end of the probation, security responsible decided to confirm/keep the workers but missed to follow the rule by informing HR Manager.
<p>Corrective Actions:</p>	<ol style="list-style-type: none"> 1. Identification and update the Job categorization and Job title of all similar cases during the coming collective agreement. 2. System to be put in place to give prior approval (Site Head) when transferring or upgrading the employees
<p>Assessment Conclusion:</p>	<p>Reviewed a letter captioned Change of Situation confirming the assistant storekeeper as Store keeper. The letter of confirmation comes along with the remunerations and job category associated with the position of Storekeeper. The audit team also reviewed a letter dated 16/12/2021 for a worker with matricule 019450. In the letter, the worker has been duly confirmed with a change in the job category and remunerations.</p> <p>The company in an effort to ensure uniformity in the areas of job categorisation and remunerations in their establishment since the 100% acquisition of SOTRADER by Olam Palm Gabon (OPG), the company has contracted the services of a Human Resource Consultant. The audit team reviewed the contract of agreement between Olam Palm Gabon and Mercer Consulting (South Africa) Pty Limited and it was set to commence on the January 9, 2022. The team also reviewed minutes of meetings between management and workers representatives. The meeting resulted in an action plan signed by both management of Olam and workers representatives. The action plan present a list of activities with timelines (including revising the current salary grid) that needs to be implemented by May 2022 when they will be</p>

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	<p>reviewing the Collective agreement. Interview with representatives of the workers representatives confirmed the meeting and action plan Based on the information provided, the NC is duly closed</p>
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Non-conformity											
NCR Ref #	2140615-202111-M3	Date Issued	03/12/2021								
Due Date	02/12/2022	Date of nonconformity Closure	01/03/2022								
Clause & Category (Critical / Minor)	6.2.3 Critical										
Statement of Nonconformity:	Lack of conformance to the employment labour requirement										
Requirement Reference:	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										
Objective Evidence:	<p>Review of a sample of workers files established that some labour requirements are not adhered to. It was observed that the basic salaries of some lower category workers were higher than the salary of workers who occupy relatively higher work category. The list is as follows AM1, AM2, AM3, AM4 in increasing order of seniority. Thus a workers in AM2 category is above a worker in AM1 category.</p> <p>Evidence identified include</p> <ol style="list-style-type: none"> 1. 041617 (AM1AA): 280,000 F 000543 (AM2AA): 213,000 F 2. 08260 (AM2AA): 333,000 F 012751 (AM4AA): 299,000 F <p>The audit team also identified cases where workers has been relocated from their original work locations to new areas of workers without the accompanying salaries and benefits. Samples evidence include agricultural workers in category OE1AA moved to work as security guards and storekeepers with categories of OE2AA and OE5 respectively</p>										
Corrections:	<ol style="list-style-type: none"> 1. Revise the pay breakdown of the concerned workers to reflect Olam Palm Gabon (OPG) current applicable salary grid. 2. Identification off all similar cases among Staff (level) for correction during collective agreement discussion in May 2022. 										
Root Cause Analysis:	<p>The difference between the basic salary is due to the fact that previously each OPG site (Awala -Mouila Lot 1- Mouila Lot 2- Mouila Lot 3- Ndende) was autonomous and had defined its own basic salary but since it is the same business unit, some workers have been transferred from a site to another (e.g from Mouila Lot 1 to Mouila Lot 3)</p> <p>Based on the gross salary received by the concerned workers, those with high category receives more than the lower categories as shown into the below table.</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 25%;">Worker ID</th> <th style="width: 25%;">Category</th> <th style="width: 25%;">Basic Salary</th> <th style="width: 25%;">Gross Salary</th> </tr> </thead> <tbody> <tr> <td style="text-align: center;">041617</td> <td style="text-align: center;">AM1AA</td> <td style="text-align: center;">280 000</td> <td style="text-align: center;">320 000.00</td> </tr> </tbody> </table>			Worker ID	Category	Basic Salary	Gross Salary	041617	AM1AA	280 000	320 000.00
Worker ID	Category	Basic Salary	Gross Salary								
041617	AM1AA	280 000	320 000.00								

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	000543	AM2AA	213 000	475 460.00
	008260	AM2AA	333 000	475 629.00
	012751	AM4AA	299 000	654 606.00
Corrective Actions:	Harmonised salary grid to be included into new collective agreement (Staff) in May 2022 to be used as reference across all OPG sites			
Assessment Conclusion:	<p>Review minutes of meeting between Management represented by the Human resource manager and the workers representatives on the need for a restructure of the salary grid of the workers to ensure uniformity in the entire establishment. The outcome of the meeting is an action plan for the review and revision of the current salary grid to be implemented in May 2022 when the Collective Agreement will be reviewed. The attendance list for the meeting and the action plan was also made available for review. Interview with the representative of the workers confirm the meeting and the agreed action plan and they have also signed onto the plan.</p> <p>Based on the information provided, the NC is duly closed</p>			

Non-conformity			
NCR Ref #	2140615-202111-N1	Date Issued	03/12/2021
Due Date	02/12/2022	Date of nonconformity Closure	Next surveillance audit
Clause & Category (Critical / Minor)	2.1.2 Minor		
Statement of Nonconformity:	Date of assessment not indicated on the assessment report		
Requirement Reference:	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		
Objective Evidence:	The company conducts yearly internal legal compliance assessment for both their 3rd party contractors and the company to monitor and ensure legal compliance is in place. The scheduled date for the Lot 3 audit is 14th November to 14th December. Although the company presented a report on an internal compliance assessment for the 3rd party Contractors, the assessment report has no date to indicate the actual day on which the audit was conducted. Also the company is yet to conduct the assessment for its own company		
Corrections:	Revise the report to include the date		
Root Cause Analysis:	There is no review system in place at the legal department		
Corrective Actions:	<ol style="list-style-type: none"> 1. From now, all legal internal audit report will be reviewed and validated 2. Following information must be mentioned into the report: <ul style="list-style-type: none"> ➢ Date and scope of the audit ➢ Date of the report 		

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Assessment Conclusion:	The corrective action plan has been reviewed and accepted. Effectiveness of corrective action taken will be further verified in the next assessment
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Non-conformity			
NCR Ref #	2140615-202111-N2	Date Issued	03/12/2021
Due Date	02/12/2022	Date of nonconformity Closure	Next surveillance audit
Clause & Category (Critical / Minor)	Minor 2.1.3		
Statement of Nonconformity:	There are no clear demarcation to identify the company's legal boundaries		
Requirement Reference:	Legal or authorised boundaries are clearly demarcated and visibly maintained, and there is no planting beyond these legal or authorised boundaries		
Objective Evidence:	The company has mapped out its legal boundaries for Ndende and has geo-referenced key locations on their boundary lines. However, there are no clear demarcations in place to show the actual legal limits of the company' operational areas.		
Corrections:	<ol style="list-style-type: none"> 1. Install all boundary beacons during dry season 2. All the limits which are not accessible will be materialized at the limit of the reachable point with indication of the direction and distance of the official point 		
Root Cause Analysis:	OPG Ndende concession is about 58 400 Ha and planted area is located at the center of concession far from official limit point. OPG Ndende planned to install on the ground the concession boundary beacons based on official coordinates mentioned into the Land Title. 18 boundary beacons were ready since October 2021 but not physically installed on the ground due to the rainy season because of the difficulty to access to the limit points which require river crossing.		
Corrective Actions:	<ol style="list-style-type: none"> 1. Ensure the maintenance of all boundary beacons during dry season 2. Keep record of the maintenance to be shown as evidence during audit when verification is not possible by auditor (audit period in rainy season) 		
Assessment Conclusion:	The corrective action plan has been reviewed and accepted. Effectiveness of corrective action taken will be further verified in the next assessment		

Non-conformity			
NCR Ref #	2140615-202111-N3	Date Issued	03/12/2021
Due Date	02/12/2022	Date of nonconformity Closure	Next surveillance audit
Clause & Category (Critical / Minor)	Minor 3.3.2		
Statement of Nonconformity:	The mill has no mechanism to check implementation of the SOPs		
Requirement Reference:	A mechanism to check consistent implementation of procedures is in place.		

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Objective Evidence:	The company's Lot 3 and Ndende estates conducts daily internal assessment to check the consistent implementation of the SOPs. However, there are no mechanisms in place to monitor implementations of the procedures at the mill
Corrections:	<ol style="list-style-type: none"> 1. Establish a system to monitor the proper implementation of the Mill Standard Operating Procedure (SOP) 2. Conduct the assessment based on the established systems (Internal audit/inspection...) with record keeping
Root Cause Analysis:	Dola POM has been commissioned only 3 months ago (1 st September 2021) . All the required systems are not yet put in place or implemented
Corrective Actions:	<ol style="list-style-type: none"> 1. Define and document the frequency of monitoring in yearly basic 2. Conduct the evaluation as per the defined program
Assessment Conclusion:	The corrective action plan has been reviewed and accepted. Effectiveness of corrective action taken will be further verified in the next assessment

Non-conformity			
NCR Ref #	2140615-202111-N4	Date Issued	03/12/2021
Due Date	02/12/2022	Date of nonconformity Closure	Next surveillance audit
Clause & Category (Critical / Minor)	Minor 3.3.3		
Statement of Nonconformity:	There are no records of monitoring at the mill		
Requirement Reference:	Records of monitoring and any actions taken are maintained and available		
Objective Evidence:	<p>The company undertakes daily internal audits to assess the effective implementation of the SOPs. Reviewed sampled internal audits reports for Harvesting, FFB Grading and Manuring audits for the year 2021.</p> <ol style="list-style-type: none"> 1. Audit Report on Fertilizer Application; Date: 17/11/2021 2. Daily Report on FFB Grading; Date: 19/11/2021 3. Daily Report on Harvesting and Loose Fruit Collection; Date: 16/11/2021. <p>For all gaps identified during the assessment, the company takes actions to remedy the deviations. Records of actions taken are maintained and were made available to the audit team for review. The internal assessment identified losses from uncollected fruits in the plantations and the action taken was to increase the supervision of the loose fruit collectors on daily basis and also increased the number of loose fruit pickers from 25 to 40 workers. However the company has no records on monitoring the implementation of the mill SOPs</p>		
Corrections:	<ol style="list-style-type: none"> 1. Put a monitoring system in place 2. Keep records of all monitoring 		

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Root Cause Analysis:	There is no system in place to monitor the proper implementation of the existing SOP that's why no record available
Corrective Actions:	<ol style="list-style-type: none"> 1. Define the annual monitoring program 2. Annual RSPO internal audit will cover and check the compliance with this indicator especially for mills
Assessment Conclusion:	The corrective action plan has been reviewed and accepted. Effectiveness of corrective action taken will be further verified in the next assessment

Non-conformity			
NCR Ref #	2140615-202111-N5	Date Issued	03/12/2021
Due Date	02/12/2022	Date of nonconformity Closure	Next surveillance audit
Clause & Category (Critical / Minor)	Minor 6.1.6		
Statement of Nonconformity:	There is evidence of different pay for same work done		
Requirement Reference:	There is evidence of equal pay for the same work scope and provision of similar necessary working tools.		
Objective Evidence:	The company issues payslips to each worker at the end of each month prior to the payment of salaries. Sampled payslips of workers were made available to the audit team. During the review of the payslips it was established that some employees belonging to the same work category and doing same work have different base salary. This was the case of workers in category AM2AA with employee codes 008260 and 000546 but have different basic salaries of 333,000F against 213,000F.		
Corrections:	Revise the pay breakdown of the concerned workers to reflect Olam Palm Gabon (OPG) current applicable salary grid.		
Root Cause Analysis:	SOTRADER was previously completely autonomous in regard of Olam Palm Gabon (OPG) and used to define its own salary baselines and job categorization which were sometimes different of OPG's one.		
Corrective Actions:	<ol style="list-style-type: none"> 1. Check and identify all similar cases for adjustment 2. Revise and update the coming collective agreement in term of salary baseline for each category 		
Assessment Conclusion:	The corrective action plan has been reviewed and accepted. Effectiveness of corrective action taken will be further verified in the next assessment		

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Non-conformity			
NCR Ref #	2140615-202111-N6	Date Issued	03/12/2021
Due Date	02/12/2022	Date of nonconformity Closure	Next surveillance audit
Clause & Category (Critical / Minor)	Minor 7.2.8		
Statement of Nonconformity:	There are no systems in place to monitor and account for pesticide containers issued from the pesticide stores		
Requirement Reference:	All pesticide containers are properly disposed of and/or handled responsibly if used for storing or for the same purposes.		
Objective Evidence:	A visit to the company's main chemical store at Ndende and Lot 3 and interview with the store keepers show that while some of the containers are recycled for use in chemical mixing, the rest are transferred for disposal at the waste landfill site. While at Lot 3, there are records of all empty pesticides issues for recycle or disposal, a visit to the chemical store at Ndende showed the company does not have records of pesticide containers that leave the store and as such could not account for any missing containers if any. Also during a field visit to Ferra and Moutassou, it was observed that not all the empty pesticide containers were destroyed to prevent inappropriate use.		
Corrections:	Put a system in place at the store level to track the pesticide containers		
Root Cause Analysis:	No proper system put in place at the store level to record chemical empty containers		
Corrective Actions:	Annual RSPO internal audit to cover and assess the implementation and effectiveness of the system		
Assessment Conclusion:	The corrective action plan has been reviewed and accepted. Effectiveness of corrective action taken will be further verified in the next assessment		

Non-conformity			
NCR Ref #	2140615-202111-N7	Date Issued	03/12/2021
Due Date	02/12/2022	Date of nonconformity Closure	Next surveillance audit
Clause & Category (Critical / Minor)	Minor 7.3.2		
Statement of Nonconformity:	Waste management does not follow company's own documented procedures		
Requirement Reference:	Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.		
Objective Evidence:	The company has a Waste Management Procedure that outlines the procedures for the management of the company's waste. The procedure categorizes waste into household, medical, and other waste. However, during field visit by the audit team and interview with sampled workers, it was observed that the procedures for the management of the waste is not clearly understood by the workers.		

	Also in Ferra it was observed that wastes were not segregated at source because the three-colour code system for waste bins is not being followed as stated in the procedures. For instance, at some waste collection site the team observed 2 red bins found with 1 green bin or some other combination not respecting the Green-Blue-Red bin as required by the procedure. Additionally, Moutassou, whereas there is a waste collection procedure that prescribes that waste will be collected from the housing units three times a week (Monday, Wednesday and Friday), interviews with waste collection staffs revealed that this procedure is not followed. This results in a situation where waste accumulates at the collection sites in the worker housing units.
Corrections:	<ol style="list-style-type: none"> 1. Revise the waste collection program taking in account the pic season of crop 2. Waste collection to be done by respected the program
Root Cause Analysis:	Waste collection team does not have any transportation means and have to request/borrow vehicle from operational team (Plantation) but during harvesting peak season the availability of trucks/tractors remain a challenge which create sometime a delay in the waste collection. Besides, the frequent breakdown
Corrective Actions:	Pilot project with 3-wheel loaders for waste collection to make waste collection team independent.
Assessment Conclusion:	The corrective action plan has been reviewed and accepted. Effectiveness of corrective action taken will be further verified in the next assessment

Non-conformity			
NCR Ref #	2140615-202111-N8	Date Issued	03/12/2021
Due Date	02/12/2022	Date of nonconformity Closure	Next surveillance audit
Clause & Category (Critical / Minor)	Minor 7.8.1		
Statement of Nonconformity:	The frequency for conducting water analysis does not conform to the company's procedures		
Requirement Reference:	<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> <ol style="list-style-type: none"> 1. The unit of certification does not restrict access to clean water or contribute to pollution of water used by communities. 2. Workers have adequate access to clean water. 		
Objective Evidence:	Review of Annex A of the company's Water Management Plan outlines the parameters and frequency for water testing. According to the procedures the company will conduct microbial analysis every months and physio-chemical analysis on quarterly basis. However review of sample reports on the analysis of water made available to the audit team shows the physio-chemical analysis are not conducted on quarterly basis as stated in the company's water management plan		
Corrections:	<ol style="list-style-type: none"> 1. Establish water testing program for 2022 2. Conduct testing as per the established program 		

Root Cause Analysis:	OPG (Lot 3 & Ndende) has a water management plan in place where it is clearly defined the frequency of testing and related parameters to be analysed. As per the plan, the microbiological testing must be conducted on monthly basis and the physico-chemical analysis on quarterly basis. The microbiological testing were conducted as planned but regarding the physico-chemical testing only 2 testing out of 3 were conducted because there were a lack of reagents at the laboratory level.
Corrective Actions:	<ol style="list-style-type: none"> 1. Revise the water management plan to the reflect the practices and in compliance with local requirements 2. In case of lack of reagent look for an alternative solution (Third party) for analysis
Assessment Conclusion:	The corrective action plan has been reviewed and accepted. Effectiveness of corrective action taken will be further verified in the next assessment

Opportunity for Improvements	
OFI #	Description
OFI 1	<p>Indicator 3.8.9 Outsourcing Activities</p> <ol style="list-style-type: none"> i) The mill shall not outsource its milling activities. In cases where the 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 ii) The mill shall ensure the following: <ol style="list-style-type: none"> a) The mill has legal ownership of all input material to be included in outsourced processes 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>Details</p> <p>The company outsources the transportation and storage of its CPO and PKO to a third party contractor by name Gabon Special Economic Zone Ports. Reviewed the service level of agreement between the contractor and Olam Palm Gabon. The requirements of the indicator are clearly stated in an Addendum and accented to by the contractor.</p> <p>However, the original two-year contract of agreement between the company and its third party contractor for the transportation and storage of CPO and PKO was signed on 28/09/2017 and has expired. So, the two parties have signed unto an addendum (31/07/2021) agreeing to some key requirements in the indicator and also stating that such requirements are binding whiles they work toward concluding on the negotiations and coming out with a final contract.</p> <p>This is raised as an OFI to monitor the progress in the finalisation of the contract in the next surveillance audit</p>
OFI 2	<p>Indicator 4.1.1</p> <p>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</p>

	<p>local communities and prohibits intimidation, corruption and harassment by the unit of certification and contracted services, including contracted security forces.</p> <p>Details</p> <p>The company has a documented Human Rights policy dated 01/09/2019 and approved by the General Manager. The policy has been shared with the communities as confirmed during the community consultations. Copies of the policy are also displayed on the company notice boards which were observed during field visits. However, field visit to estate 16 (blocks K40-41), estate 17 (blocks L58, P53-54) and estate 18 (blocks I7/8) and interview with sampled workers established that there were no reported cases of human rights abuses during the time of the audit</p> <p>However it was observed by the audit team that some of the workers are not aware of the company's policies while others stated that the policies have been explained to them during their morning muster. This is raised as an OFI to monitor progress on the communication of the policies to reach all workers in the next surveillance audit</p>
<p>OFI 3</p>	<p>Indicator 6.7.2</p> <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>Details</p> <p>The company has identified different emergency situations in their operational areas to include fire, accident, spillage of fuel, chemical contamination and in each the company has developed and documented procedures in place. Sampled emergency procedures were made available for review. Copies of the procedures has been made available at the various working sites.</p> <p>During field visits to Estate 16 and 17 (K40-41, L58) trained first aid personnel with their first aid kits were observed at the site. An inspection of the kits shows items including bandage's, spirit, plaster and gauze which they use to administer first aid when there is an accident on site before seeking secondary health treatment at the company's clinic on site. Interview with the company doctor indicates he provides training to the first aiders and every two years gives a refreshers training. Training is also conducted for new recruits as first aiders. Records of training and the list of attendance was made available for review. The list of first aiders on the plantations and interviewed by the audit team were found to be part of the training.</p> <p>The first aiders have a recording form in which all accidents on site and first aid provided are to be recorded and submitted to the Clinic. However, at Ndende although the first aiders had the forms, none has been filled at the time of the audit. A visit to the clinic and interview with the resident doctors showed samples of received filled accident forms from Lot 3. This is raised as an OFI to monitor the progress on recording from Ndende in the surveillance audit next year.</p>

Positive Findings	
PF #	Description
PF 1	Management commitment to the RSPO Certification process is commendable
PF 2	In general staff demonstrated good understanding of the RSPO Standard
PF 3	The construction of a new hospital facility demonstrate management commitment to workers welfare
PF 4	Proper organization of document and files

3.3.1 Status of Nonconformities Previously Identified and Observations (N/A)

Non-conformity			
NCR Ref #		Date Issued	
Due Date		Date of nonconformity Closure	
Clause & Category (Critical / Minor)			
Statement of Nonconformity:			
Requirement Reference:			
Objective Evidence:			
Corrections:			
Root Cause Analysis:			
Corrective Actions:			
Assessment Conclusion:			

Opportunity for Improvement (N/A)	
OFI#	Description
OFI 1	<p>OFI Statement:</p> <p>Verification / Follow-up actions:</p>

3.3.2 Summary of the Nonconformities and Status

CAR Ref.	Category (Critical / Minor)	P&C Indicator	Issued Date	Status & Date (Closure)
2140615-202111-M1	Critical	3.6.1	03/12/2021	Closed, 01/03/2022
2140615-202111-M2	Critical	6.2.1	03/12/2021	Closed, 01/03/2022
2140615-202111-M3	Critical	6.2.3	03/12/2021	Closed, 01/03/2022
2140615-202111-N1	Minor	2.1.2	03/12/2021	Open, Next Audit
2140615-202111-N2	Minor	2.1.3	03/12/2021	Open, Next Audit
2140615-202111-N3	Minor	3.3.2	03/12/2021	Open, Next Audit
2140615-202111-N4	Minor	3.3.3	03/12/2021	Open, Next Audit
2140615-202111-N5	Minor	6.1.6	03/12/2021	Open, Next Audit

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2140615-202111-N6	Minor	7.2.8	03/12/2021	Open, Next Audit
2140615-202111-N7	Minor	7.3.2	03/12/2021	Open, Next Audit
2140615-202111-N8	Minor	7.8.1	03/12/2021	Open, Next Audit

3.4 Stakeholders and previous land owner / user consultation

Stakeholder consultation involved internal and external stakeholders. External stakeholders were contacted by telephone to arrange meetings at a location convenient to them to discuss Olam Palm Gabon SA- Dola Palm Oil Mill Certification Unit’s environmental and social performance, legal and any known dispute issues.

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.

Stakeholders contacted		
Type of Stakeholder (e.g. Internal, Union, Contractor, Governmental Department, NGO, External, Communities)	Stakeholder name / organization	Means of communication (e.g. face to face interview, email, phone interview, comment from public notice)
Internal Stakeholder	Gender Committee	Face to Face
Internal Stakeholders	Workers Representative	Face to Face
Third party Contractors	Labour Contractors	Face to Face
Government Department	C.C Eaux et Foret Dola	Face to Face
Government Department	Préfet Dola (Ndende)	Face to Face
Communities	Moutassou, Mbadi, Ferra, Mounigou, Canton Dola Nord	Face to Face

Stakeholders comment	
Gender Committee	<p>Feedbacks: The company has a gender committee in place, established in November 29, 2019. The terms of reference for the committee includes training on forms of sexual violence, harassment and violation of women's rights.</p> <p>The committee has a program of activities and it includes sensitization and investigation of any form of workplace violence.</p> <p>The committee revealed that due to Covid 19 pandemic they have not been able to undertake any of their planned activities for the year.</p> <p>Audit Team verification and response:</p>

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	<p>Interview with workers confirmed knowledge about the existence of the committee. Although not much has been done by the committee in term of awareness and sensitization, the workers indicates been briefed on some of the activities of the committee.</p>
Workers Representatives	<p>Feedbacks: They ensure the rights of workers are protected and also defend the interest of workers. Generally they have a cordial relationship with management of Olam Palm Gabon-Bilala POM. In general they have no major issues of concern</p>
	<p>Audit Team verification and response: There are no major issues of concern</p>
Labour Contractors	<p>Feedbacks: They provide workers for field activities in the plantations such as pruning, harvesting, decreeping and many more. Generally they enjoy a good relationship with Olam Palm Gabon-Bilala POM. Their only concern has to do with the duration of the contract they have with the company. They claim the six months renewable contract duration they have with company is too short and must be extended to at least a year.</p>
	<p>Audit Team verification and response: Management responded that the six months contract duration helps the company to keep their labour contractors in check. The duration used to be a year, however the company realised the contractors takes advantage of the long duration to flout some of the company policies. It's for this reason that the company took the decision to reduce the duration to six and its renewable base on how the contractor complies with the policies of the company</p>
Foret Dola	<p>Feedbacks: In general there were no issues of concern</p>
	<p>Audit Team verification and response: N/A</p>
Préfet Dola	<p>Feedbacks: They have a good relationship with the company and there are no issues of concern</p>
	<p>Audit Team verification and response: Company was compliance to all relevant laws</p>
Moutassou	<p>Feedbacks: The community has a good relation with the company and the company has shared their policies and procedures with them. On the issue of land, the community acknowledge the company has all the needed permit from the state to operate on the land. However, they only hope the company will do more in areas of social-economic development beyond the social agreement made in 2016.</p>
	<p>Audit Team verification and response: In response, management stated that they are aware of the needs of the communities and that is why the social policy is in place with a development plan to contribute significantly to the socio-economic development of the communities. The company together with the community identifies community needs and it is implemented as part of the social development</p>
Mbadi	<p>Feedbacks: The populations felt that a framework for an exchange relationship exists with Olam Palm Gabon. Regular visits are made by the communication and social relations department. A workbook recapitulates all the passages and the agreed points of agreement. However, the population points the finger at the slowness in the execution of grievances.</p>
	<p>In addition to this, several non-functional installations such as solar street lights offered by Olam Palm Gabon which are no longer functional, faulty human motor pumps are the subject of much discontent within the community.</p>

	<p>Audit Team verification and response:</p> <p>The auditor first verified that requests had been made to this effect (either via the grievance book or via the social agreements).</p> <p>Then, another level of verification consisted of verifying how this is handled at the level of Olam Palm Gabon.</p> <p>Acknowledgments of receipt for the renewal of streetlights and village pumps have been noted. However, it should be noted, with regard to the procedures that the execution of the works is subject to a procedure which begins with the execution of the needs, the prioritization of the needs for the community, including the ordering of the equipment, and the selection of a contractor in the event that the technical means of Olam Palm Gabon cannot carry out the work.</p> <p>This whole process takes time and arouses impatience and grievances among the villagers.</p>
Ferra	<p>Feedbacks:</p> <p>The community generally has a cordial relationship with the company with communication between two also at best. There was evidence of communication and the sharing of information between the company and the community. However, they complained about the short notices given them prior to some meetings. This leaves them ill prepared for the meeting.</p> <p>Also they complained about their inability to access certain information that they consider important and strategic. This concerns the areas occupied by Olam Palm Gabon on their land in Ferra</p> <p>Audit Team verification and response:</p> <p>Interview with management indicates the company has a community relations officers who engages with the communities on all social and community issues. He provides all company information and documents to the communities. The audit team review minutes of engagements between the company and the communities with attendance list.</p> <p>On the issue of short notices, management indicated that these are isolated cases which happens when government agencies are scheduled to be part of the meeting. The government agency normally have busy schedules and as such difficult to have meetings according to planned schedules when they are involved.</p> <p>Regarding communication and information on the areas occupied by Olam Palm Gabon on Ferra lands, management indicated that all official information on the project have been shared with the communities through their chiefs. The company made available minutes of meetings on the participatory mapping which took place on the 28/06/2016 in which the community was represented. The company stated that all official documents were shared with the communities.</p>
Mounigou	<p>Feedbacks:</p> <p>The community indicates they have a cordial relationship with OPG and this relationship keeps improving over time. The company has taken all necessary step to share their policies and procedures with the community and has explained to their understanding through the community relations officer. They confirmed knowledge about legal permit of that OPG that allows them to operate on the land and there are land dispute with the company. However, due to the population size, they will request the company to make available some areas for the community to use for subsistence farming.</p> <p>The company has also made social contributions to the company. However, they will plead with the company to expand in the areas of employment of the youth since a lot are still unemployed.</p> <p>Audit Team verification and response:</p> <p>Interview with management indicates they have taken notice and it will be looked into. However on the issue of space, there has been a tripartite commission which has just completed an inventory</p>

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	work on the total area occupied by OPG. And a second assessment with the communities will be done in order to identify areas that can be allocated to the communities.
Canton Dola Nord	<p>Feedbacks: The community confirmed that the company has shared their policies and procedures with them. Also all other necessary information is shared with them through the community relations officer. There has been social contribution by the company to the communities. However, they will like to see this social developments increased over time. There were no complains of land disputes with the company.</p> <p>Audit Team verification and response: Interview with management indicated that the community is among the list of communities that has a social agreement with the company and the company implements these social agreements in consultations with the communities. The company will continue to engage the communities with respect to their social needs.</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
Ndende	2015	58,400	Yes	No	Compliance
Lot 3	2015	38,363	Yes	No	Compliance

Previous land owner / user comment	
Government of Gabon	<p>Feedbacks: The company acquired the rights to land use after negotiation and agreement with the government of Gabon. Under the laws of the country, all land belongs to the state and as such can grant the right to land use. Although communities do not own land in Gabon, the state recognises the customary rights of communities over land and as such their interest (such as farming, fishing, hunting and access and respect for sacred areas and their traditions) are taking into considerations during the transfer of land rights to other entities.</p> <p>Audit Team verification and response: Land for OPG operations was granted by the Gabonese Republic, represented by Daniel ONA ONDO, Prime Minister, Head of Government (N ° 001 / MIHAT / ANUTTC) of April 22, 2015. In recognition of the customary right to land by the communities and in compliance to the laws of Gabon, the company held a series of consultations with the communities to identify their needs and also contribute to community development. There was also participatory mapping of areas of community interest.</p>

3.5 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.

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Formal Signing-off of Assessment Conclusion and Recommendation

<p>The audit objectives have been achieved and the certificate scope is appropriate. Based on the results of this audit, it is concluded that Olam Palm Gabon-Dola Palm Oil Mill has complied with the Gabon National Interpretation 2019 of the RSPO P&C 201 and audit criteria identified within the audit report. It is deemed that the management system has achieved its intended outcomes. Therefore, it is recommended that Olam Palm Gabon-Dola Palm Oil Mill is certified.</p>	
Report prepared by	Acceptance of Assessment Conclusion
Name: Dennis Acquah	Name: Mahamadou DAO
Company Name: BSI	Company Name: Olam Palm Gabon SA
Title: Lead Auditor Dennis Acquah	Title: Head of certification
<p>Signature:</p> 	<p>Signature: <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></p> 
Date: 30/03/2022	Date: 30/03/2022

Appendix A: Summary of Findings

Criterion / Indicator		Assessment Findings	Compliance
Principle 1: Behave ethically and transparently			
Criterion 1.1: 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>(C) Management documents that are specified in the RSPO P&C are made publicly available.</p> <p>- Critical (Major) compliance -</p>	<p>Olam Palm Gabon-Bilala POM has a list of management document that they make publicly available. The document are made publicly available through display on notice boards in and around the company. The company has also shared copies of all such documents with the communities through their chiefs and representatives. Interview with community leaders all confirmed receipt of the company documents. The documents include:</p> <ol style="list-style-type: none"> 1. Policy for the protection of reproduction rights 2. Policy on sexual harassment and other forms of harassment 3. Policy on child labor 4. Human rights policy 5. Policy of freedom of association and collective bargaining 6. Special labor policy 7. Ethics policy 8. Whistleblower policy 9. HSE policy 10. Policy on equal opportunities in employment 11. Policy on forced labor and trafficking, contract substitution and immigrant and temporary workers 	Complied

Criterion / Indicator		Assessment Findings	Compliance
		12. The participatory mapping procedure 13. The procedure for handling external complaints 14. Protection policy for protected areas; 15. The procedure for the management of areas with High Conservation Values 16. The communication and consultation procedure A visit to the company's notice board showed all the documents been displayed. Some other documents are also made available on request. They include <ol style="list-style-type: none"> 1. Land title documents 2. Pollution prevention and reduction plans 3. Environmental and Social Impact Assessment Plan 	
1.1.2	Information is provided in appropriate languages and accessible to relevant stakeholders. - Minor compliance -	The official written and spoken language in Gabon is French and as such all their information are documented in French and shared with all relevant stakeholders. Interview with the Human Resource manager indicated that the laws of Gabon does not permit the use of any other language be it foreign or local dialect to be used as any means of communication or for training other than the French language. OPG to ensure their workers are abreast with all needed information and communication, organizes introductory French lesson for all their workers for a year. A sample of workers interviewed in the field during the audit period confirmed they are introduced to French lesson for a year	Complied
1.1.3	(C) Records of requests for information and responses are maintained. - Critical (Major) compliance -	Reviewed a procedure (SOP N ° 005 / CRS DI (4) / 0120 Revision 04 to allow any interested person to make a request for information. Interview with management and review of document shows there were no request for information at the time of this audit.	Complied

Criterion / Indicator		Assessment Findings	Compliance
1.1.4	<p>(C) Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by a nominated management official.</p> <p>- Critical (Major) compliance -</p>	<p>The company has a documented consultation procedure and dated 07/02/2012 in place. Review of minutes of meetings with attendance shows the company has explain the procedure with the communities. Also there were signed evidence acknowledging receipt of the procedure by the various community leaders.</p> <p>Also during the community consultations, communities confirmed the procedure has been explained to them and they were able to identify Ms. Ms. Tatiana Eboua as the management nominated person who explained the procedure and all other company documents to them.</p>	Complied
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>The company maintains a list of their stakeholders dated 26/07/2021 which was made available to the audit team for review. The list of stakeholder include Government Agencies, Workers Representatives, NGO's, gender Committee Service Providers and many more. Some of the stakeholders were selected for interview.</p>	Complied
<p>Criterion 1.2: The unit of certification commits to ethical conduct in all business operations and transactions.</p>			
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>OPG-Bilala has a documented code of ethics is in place and the aim is to guarantee a working environment free from deviant behaviour. The document is communicated to internal and external stakeholders through the following channels:</p> <ol style="list-style-type: none"> 1. During induction for new employees 2. Displays on the company's notice boards 3. During their morning muster 4. Signage (such as no drinking of alcohol on site) 5. Contract with third party contractors 	Complied

Criterion / Indicator		Assessment Findings	Compliance
		Copies of the ethical conduct has also been shared with communities and business partners as confirmed during the community interviews. Review of sample contracts of the company with third party contractors such as Agro Vitalu and Ets Josuesdras established code of ethics including respect for human rights, the payment of wage earners in accordance with the provisions of the law, the obligation to declare workers to social security, the prohibition of recruiting people under the age of 18 are contained in the contracts	
1.2.2	A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice. - Minor compliance -	The company implements the policy through internal regulations that defines and monitors the actions of workers. The company also conducts monthly internal assessment to check compliance to the country's laws and internal policies. To monitor compliance to the ethical policy by workers, the company through the human resource department conducts internal audits on daily basis. The assessment also covers compliance by the third party contractors to the ethical policy. Review of sampled workers files shows queries have been issued to workers asking for an explanation to behaviors' deemed contrary to the code of ethics	Complied
Principle 2: Operate legally and respect rights			
Criterion 2.1: There is compliance with all applicable local, national and ratified international laws and regulations.			
2.1.1	(C) The unit of certification complies with the applicable legal and regulatory requirements. - Critical (Major) compliance -	The company has a documented legal registry captioned "List of Laws and Applicable Conventions referenced N°01/LEG LIST/0621 and dated 06/06/2021. The list is made up of 118 local laws and 57 applicable international conventions. Sampled evidence of compliance by the company to the legal requirements are	Complied

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Criterion / Indicator	Assessment Findings	Compliance
	<p>1. In compliance to the country’s Environmental Legislation, the company for an establishment of its irrigation project has conducted a Social and Environmental Impact Assessment (SEIA) and in line with the government directive has been issued a Certificate of Compliance with Number 0400/MEFPEPGDE/SG/DGEPN.</p> <p>2. Evidence of compliance to the payment of social security. Payment as by the laws of Gabon is done quarterly.</p> <p>a. Reference 21DS000081728 Date of Payment: 26/04/2021 Period: First Trimester Company ID: 001-0175470-W Olam Palm Gabon Amount paid: 549,923,985 Gabonese Franc</p> <p>b. Reference 21Q0000080203 Date of Payment: 28/07/2021 Period: Second Trimester Company ID: 001-0175470-W Olam Palm Gabon Amount paid: 639715687 Gabonese Franc</p> <p>c. Reference 21Q00000827738 Date of Payment: 28/10/2021 Period: Third Trimester Company ID: 001-0175470-W Olam Palm Gabon Amount paid: 578,374,532 Gabonese Franc</p>	

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Criterion / Indicator		Assessment Findings	Compliance						
2.1.2	<p>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.</p> <p>- Minor compliance -</p>	<p>The company conducts yearly internal legal compliance assessment on both their 3rd party contractors and on the different department of the company to monitor and ensure legal compliance is in place. Reviewed a report Audit Calendar for the Legal Compliance of the OPG Mouila Contractors. The scheduled date for the Lot 3 audit is 14th November to 14th December.</p> <p>To track changes in the law, the company has subscribed to the country's Official Journal. This is a government owned news outlet that publishes changes in the law as well as the passage of new laws. The company receives changes or amendment to the laws through mails from the news outlets. The last communication between the company and the news outlet was made available to the audit team for review. In the mail communication the company through their lawyer has received copies of newsletters for the month of September and October.</p> <p>Although the company presented a report on an internal compliance assessment for the 3rd party Contractors, the assessment report has no date to indicate the actual day on which the audit was done.</p>	Non-compliance						
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>	<p>The company has clearly demarcated its Lot 3 legal boundaries with the use of boundary pillars. During field visit to observe two sampled pillars, the pillars were found to be in place and their GPS coordinates were taking.</p> <table border="1" style="margin-left: auto; margin-right: auto;"> <tbody> <tr> <td>Pillar I</td> <td>S 01.92556°</td> <td>E 010.95644°</td> </tr> <tr> <td>Pillar C</td> <td>S 01.88870°</td> <td>E 011.00905°</td> </tr> </tbody> </table> <p>The total number of pillars for the Lot 3 estates are 25 and all are inspected and maintained ones in a year. Reviewed the last</p>	Pillar I	S 01.92556°	E 010.95644°	Pillar C	S 01.88870°	E 011.00905°	Non-compliance
Pillar I	S 01.92556°	E 010.95644°							
Pillar C	S 01.88870°	E 011.00905°							

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Criterion / Indicator		Assessment Findings	Compliance
		<p>inspection report titled "Rapport Sur Le Suivi Des Bornes Du Lot 3" for the month of October</p> <p>The company has mapped out its legal boundaries for Ndende and has geo-referenced key locations on their boundary lines, there are no clear demarcations to identify the boundary limits.</p>	
Criterion 2.2: 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>	<p>The company maintains a list of all their contracted parties. The list made available for review is made up of 40 contractors who provide Agricole and transport services. The contract of agreement between four contractors (Clement Plus GT, Frankline Services, Elu Services Du Gabon and Adams Services Ndende) and the company were selected for review and all were valid as of the time of this audit.</p>	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>Reviewed contract of agreement between the company and Clement Plus GT, Frankline Services, Elu Services Du Gabon and Adams Services Ndende. All contains a clause on meeting applicable legal requirements and they include</p> <ul style="list-style-type: none"> a. Evidence of compliance to the registration of Business entity <ul style="list-style-type: none"> 1. Company: Societe Agricole Et Prestation Au Gabon (SAPGA) Registration No.: 003-7677-GH CNSS No.: 004-0183887-O No CNAMGS:091-800-021-283 2. Company: Societe Adam's Services Registration No.: ANP1646861042193 CNSS No.: 014-0206753-A No CNAMGS:122-000-026-839 	Complied

Criterion / Indicator		Assessment Findings	Compliance
		<ul style="list-style-type: none"> b. Evidence of compliance to the payment of social security for workers 1. Company: Adams Services Reference: 21Q000072611 Date of Payment: 30/04/2021 Period: First Trimester Company ID: 004-01988809-M ADAMS SERVICES Amount paid: 760,000 Gabonese Franc Number of workers: 15 2. Company: Societe Agricole Et Prestation Au Gabon (SAPGA) Reference: 21Q000088603 Date of Payment: 29/10/2021 Period: Third Trimester Company ID: 004-0183887-0 Societe Agricole Et Prestation Au Gabon (SAPGA) Amount paid: 10,560,000 Gabonese Franc The Number of workers: 183 	
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>	<p>Reviewed contract of agreement between the company and Clement Plus GT, Frankline Services, Elu Services Du Gabon and Adams Services Ndende. All contains clauses on disallowing child, forced and trafficked labour.</p>	Complied
<p>Criterion 2.3: All FFB supplies from outside the unit of certification are from legal sources.</p>			

Criterion / Indicator		Assessment Findings	Compliance
2.3.1	<p>(C) For all directly sourced FFB, the mill requires:</p> <ul style="list-style-type: none"> Information on geo-location of FFB origins Proof of the ownership status or the right/claim to the land by the grower/smallholder Where applicable, valid commercial license, or is part of a cooperative which allows the buying and selling of FFB. <p>PROCEDURAL NOTE: 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>	<p>The company sources all its FFB directly from their plantations. Geo-locations of the FFB origins has been provided in the mill details of the report. Also evidence of legal right to the use of land has been provided in 4.4.1</p>	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>	N/A the company does not use agents in sourcing their FFBs	Not Applicable
<p>Principle 3: Optimise productivity, efficiency, positive impacts and resilience</p>			
<p>Criterion 3.1: There is an implemented management plan that aims to achieve long-term economic and financial viability.</p>			
3.1.1	<p>(C) A business or management plan (minimum three years) is documented that includes, where applicable, a jointly developed business case for Scheme Smallholders. - Critical (Major) compliance -</p>	<p>Olam Palm Gabon has established and implemented its commitment to long term sustainability and improvements through a capital expenditure programme. A Budget and 7 years' management plan was verified during the audit. OPG has gazetted long range business plan (OPEX and CAPEX: FY2019 - FY2041) for all Concessions. The projection covers FFB forecast, extraction rate (OER & KER), direct cost (upkeep, fertilizer, R&D, mechanization, upkeep tools, harvesting, mill processing and overhead - manager & staff</p>	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		emolument) and in-direct cost (corporate allocation). The company does not have Scheme Smallholders in their operations.	
3.1.2	An annual replanting programme projected for a minimum of five years with yearly review, is available. - Minor compliance -	The company did the first replanting in 2015 for the Lot 3 and in 2016-2017 for the Ndende plantations and has no plans of replanting until the next 25 years or more.	Complied
3.1.3	The unit of certification holds management reviews at planned intervals appropriate to the scale and nature of the activities undertaken. - Minor compliance -	The company conducts management reviews ones every year as indicated in the company's procedure for Internal Audits and Management Review contained in the Supply chain and Traceability Procedure dated 01/10/2021. The company has had its management review for the year under audit. Copy of the minutes of meeting was made available to the audit team for review. 1. Minutes of Management Review Meeting RSPO P & C Mouila Lot 3 Date: 14/10/2021 Attendance: 13 management Staff	Complied
Criterion 3.2: 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.			
3.2.1	(C) 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. - Critical (Major) compliance -	The company has an action plan for continuous improvement last revised in April 2019. Review of the plan has detailed on all the requirement at mentioned in the indicator. Some evidence of implementation is: Reviewed document captioned" Pesticides Active Ingredient Analysis Per hectare" with reference number PRP-EN02 and dated 05/10/2017. The report shows the reduction in the use of pesticide in the plantations. The report is updated from January to October indicates for pesticide:	Complied

Criterion / Indicator		Assessment Findings	Compliance
		<ol style="list-style-type: none"> 1. BEST UP 480 SL the active ingredient/ha reduced from 0.30 in January to 0.22 in October. 2. Ally 20WG the active ingredient/ha reduced from 0.00752 in January to 0.0045 in October 3. Garlon 250 the active ingredient/ha reduced from 0.0484 in January to 0.019 in October. 	
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>The company has filled and submitted the metric template. All information provide has been verified by the audit team. The template was completed by the sustainability manager</p>	Complied
<p>Criterion 3.3: Operating procedures are Appropriately documented, consistently implemented and monitored.</p>			
3.3.1	<p>(C) Standard Operating Procedures (SOPs) for the unit of certification are in place.</p> <p>- Critical (Major) compliance -</p>	<p>The company has a list of SOPs for the estate which are contained in a document titled Agricultural Manual Vol 1 and 2. Review of the manual shows the following SOPs</p> <ol style="list-style-type: none"> 1. Harvesting and FFB Evacuation 2. Pruning and Fond Management 3. Fertilizer Sampling for Quality Control Analysis 4. Leaf and Soil Sampling Procedures <p>Reviewed document captioned Standard Operating Procedure for the mill dated 24/04/2021. The document is a compilation of all the procedures for the mill. Sampled procedures reviewed include:</p> <ol style="list-style-type: none"> 1. Procedure for the Reception station 2. Fruit handling procedures 3. Sterilization procedures 4. Effluent Treatment Procedures 	Complied

Criterion / Indicator		Assessment Findings	Compliance
		<p>5. Procedure for the kernel Recovery Station</p> <p>The SOPs are written in French which is the official written and spoken language in Gabon. However, the company also had English version in place. Copies of the Sops have been made available at the work sites</p>	
3.3.2	<p>A mechanism to check consistent implementation of procedures is in place.</p> <p>- Minor Compliance -</p>	<p>The company monitors the implementation of the SOPs in the plantations by conducting daily internal assessments.</p> <p>However, there are no mechanisms in place to monitor implementations of the procedures at the mill</p>	Non-compliance
3.3.3	<p>Records of monitoring and any actions taken are maintained and available.</p> <p>- Minor Compliance -</p>	<p>The company undertakes daily internal audits to assess the effective implementation of the SOPs. Reviewed sampled internal audits reports for Harvesting, FFB Grading and Manuring audits for the year 2021.</p> <ol style="list-style-type: none"> 1. Audit Report on Fertilizer Application Date: 17/11/2021 2. Daily Report on FFB Grading Date: 19/11/2021 3. Daily Report on Harvesting and Loose Fruit Collection Date: 16/11/2021. <p>For all gaps identified during the assessment, the company takes actions to remedy the deviations. Records of actions taken are maintained and were made available to the audit team for review. The internal assessment identified loses from uncollected fruits in the plantations and the action taken was to increase the supervision</p>	Non-compliance

Criterion / Indicator		Assessment Findings	Compliance
		<p>of the loose fruit collectors on daily basis and also increased the number of loose fruit pickers from 25 to 40 workers.</p> <p>However, there were no records of monitoring the implementation of the mill SOPs</p>	
<p>Criterion 3.4: 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>(C) 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>Olam Palm Gabon commissioned an independent SEIA for their operations in Lot 3 (Etude D’Impact Environnemental et Sociale: Implantation “Une Palmeraie dans la Zone de Mouila, Lot 3; Tome I: Rapport Final, May 2015).</p> <p>The assessment was conducted by Terea/Proforest and the final report was submitted in May 2015. The report was viewed during the time of the audit. An entire section of the study was dedicated to the socio-economic assessment. This part identified several village communities (Mbengui, Mbadi, Mounighou, Makand, Ikolo, Bavanga, among others). According to the report, consultations were carried out with all identified communities.</p> <p>For the Mouila Lot 3 extension, the SEIA is titled Projet d’extension de Palmeraie dite Olam Palm Mouila Lot 3; Etude d’Impact Environnemental et Social, by Terre Environnement Aménagement (TERA), of January 2017.</p> <p>For Ndende Plantation, OPG commissioned an independent SEIA: Plantations de Palmiers a Huile Cooperative a Ndende (Programme</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance
		<p>Graine), Etude d'Impacte Environnemental et Social, Tome I: Rapport Final, Juin 2016. Conducted by Terea.</p> <p>According to the report, Nanga, Ferra, Ngoussou, Minganga, and Mougali communities were identified and consulted during the SEIA process.</p>	
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>For Lot 3:</p> <p>Based on the SEIA study, a management and monitoring plan has been developed for Lot 3 titled Plan De Gestion Environnementale et Sociale, Implantation D'une Palmeaire Dans La Zones De Mouila (Lot 3) (Environmental and Social Management Plan, Establishment of a Palm Grove in the Mouila Areas (Lot3) dated May 2015 and conducted by Terea.</p> <p>For the Mouila Lot 3 extension, the monitoring and management plan is titled Projet d'extension de la Palmeraie dite Olam Palm Mouila Lot 3. Plan de Gestion Environnemental et Sociale (PGES). February 2021, by TEREA.</p> <p>For Ndende:</p> <p>For Ndende plantation, the monitoring and management plan is titled Plantations de Palmiers a Huile Cooperatives a Ndende (Programme Graine) ; Plan de Gestion Environnementale et Sociale, of June 2016, By Terea. Terre Environnement Amenagement; B.P. 831 ; Batterie IV, Gros Bouquet II, Libreville-Gabon.</p>	Complied
3.4.3	<p>(C) The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way.</p>	<p>OPG continues to implement the recommendations in the management and monitoring plan and submits annual reports to</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance
	- Critical (Major) compliance -	<p>the Department of Environment accordance to the Gabon Code of Environmental No16/93 dated 26/08/1993.</p> <p>In this regard, the annual implementation and monitoring report for 2020 was seen during the audit. Titled : Rapport du Suivi de Progres du PGES d'Olam Palm Gabon (OPG) au Cours de l'Anne 2020 ; Plantation de Moutassou Lot3, dated August. 2021 (Progress Report of Social and Environmental Management Plan for the Year 2020).</p> <p>For Ndende plantation, the progress report for 2020 was titled Rapport du Suivi de progress du PGES Sotrader au Course de l'Annee 2020 – Plantation Ndende (Progress Report of Social and Environmental Management Plan for the Year 2020 – Ndende Plantation).</p>	
Criterion 3.5: A system for managing human resources is in place.			
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>The company has a documented procedure in place for recruitment, selection, hiring, promotion, retirement and termination. The document was made available to the audit team. A review of the procedure indicates recruitment starts with an internal advertisement through memos to inform departmental heads of the vacant position.</p> <p>If the company is unable to recruit internally, the position is placed on external advertisement. This involves recruitment from the neighbouring communities and outside communities.</p> <p>Selected applicants are shortlisted based on qualifications and are subjected to interviews and medical test. Review of some workers' files showed recruitment is consistent with the procedure.</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance
3.5.2	Employment procedures are implemented, and records are maintained. - Minor Compliance -	Review of a sampled workers file confirmed the implementation of the company's procedures. Records of job advertisement, applications received, interview of short listed applicants leading to job offers and contracts were made available to the audit for review	Complied
Criterion 3.6: An occupational health and safety (H&S) plan is documented, effectively communicated and implemented.			
3.6.1	(C) All operations are risk assessed to identify H&S issues. Mitigation plans and procedures are documented and implemented. - Critical (Major) compliance -	<p>The company has conducted risk assessment of all activities in their plantations in a report titled "Register of the Risk Analysis on Health and safety at Work" dated 30/01/2020. Also at the mill the company has documented a risk assessment report for the mill and titled "Dola Palm Oil Mill Risk Assessment" and dated 10/05/2021. The assessment covers loading ramp, weighbridge, building construction, Covid 19 and many more. The plan is implemented through a combination of trainings and awareness. The company has developed a training plan which covers all staffs including new recruits, store keepers, workshops, contractors and many more. Some records of training conducted was made available for review:</p> <ol style="list-style-type: none"> 1. Topic: Training on the use of safety harness Date: 25/11/2021 Site: Lot 3 Attendance: 2 workers 2. Topic: Sensitization of Spraying Date: 10/09/2021 Estate: 14 (Lot 3) Attendance: 5 workers 	Non-compliance

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		<p>3. Topic: Accident Prevention at the Palmistries Date: 29/11/2021 Site: Dola Mill Attendance: 13 workers</p> <p>4. Topic: Wearing of PPEs Date: 06/09/2021 Site: Dola Mill Attendance: 13 workers</p> <p>During document review for Ndende and Lot 3 (estate 10), the company made available two risk assessment reports. One with no risk assessment on the Covid 19 and another with assessment on the Covid 19 which according to the Health and safety officer is the updated one. However, both report have the same date of revision. Thus the updated and out dated version were revised on the same day.</p> <p>Also during a visit to estate 17, block L58 where semi mechanical spraying was being done using tractors, it was established during interview with the tractor driver that there were no warning triangles in the tractors for use in case of a breakdown. This same incident was recorded in estate 10, I7 when the driver for the vehicle for transporting workers was asked about the warning triangles for the vehicle.</p>	
3.6.2	<p>(C) The effectiveness of the H&S plan to address health and safety risks to people is monitored. - Critical (Major) compliance -</p>	<p>The company monitors the effectiveness of their H&S plan through their monthly analysis of the Accident Data. The analysis covers accident statistics according to companies (Olam and Contract workers), workplace (Estates), activities (eg Loading, manuring,</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance
		<p>Transport etc) and causes of accidents (fall/slip, Eye, Cut). The different Accident statistics report for the month of October was made available for review. The report shows</p> <ol style="list-style-type: none"> 1. Death at work-0 2. LTA/LTI at work-4 3. FAC/MTC/RWC at work -1 4. Unsafe act/Unsafe Conditions/Near Misses-1 <p>Results of this analysis are fed into the action plan.</p>	
<p>Criterion 3.7: All staff, workers, Scheme Smallholders, out-growers, and contract workers are appropriately trained.</p>			
3.7.1	<p>(C) 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&C, in a form they understand, and which includes assessments of training.</p> <p>- Critical (Major) compliance -</p>	<p>The company has a documented training plan for both the plantation and the mill. The plan for the plantation was made available for review. The Training plan captioned "Training Programme for the Sensitization on HSE-2021". Some of the planned training are Chemical waste segregation, Housing waste segregation and Manual Loading.</p> <p>Some evidence of trainings are:</p> <ol style="list-style-type: none"> 1. Topic: Spraying Site: Lot 3B (estate 15) Date: 19/10/2021 Attendance: 8 workers 2. Topic: Spraying Semi mechanical Site: Ndende (estate 18) Date: 23/11/2021 Attendance: 18workers 	Complied

Criterion / Indicator		Assessment Findings	Compliance
3.7.2	Records of training are maintained, where appropriate on an individual basis. - Minor Compliance -	Other training records reviewed are 1. Training on the Use of Safety Equipment Date: 18/05/2021 Venue: Estate 10 & 11 Attendance: 11 workers	Complied
3.7.3	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. - Minor Compliance -	The company has identified the Mill manager, Senior Mill assistant, Mass Balance Recorder and Weighbridge operator as personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS). The company has a documented training plan in place to provide training to these personnel to ensure the effective implementation of the SCC. The plan as reviewed has subjects on Accounting systems, Approving suppliers and RSPO scope, sales documents and conformity. Records of training made available for review include 1. Topics: What is RSPO, RSPO Supply Chain, Approving Supplier and RSPO Scope Date: 13/10/2021 Attendance: 1 Weighbridge Clerk 2. Topic: RSPO SCC Lead Auditor by Checkmark Date: 18-19 th October 2021 Attendance: 6 workers	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)			
3.8.1	Identity Preserved Module	N/A	Not Applicable

Criterion / Indicator		Assessment Findings	Compliance
	<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&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>		
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>The company is implementing the Mass Balance Supply chain model. They source their certified FFB from Lot 3 which includes Estate 10 and the non-certified FFB from their uncertified estate (Ndende) which includes estate 16, 17 and 18.</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&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>The company gave its projections as</p> <p>FFB-198,009 MT</p> <p>PK-8,010 MT</p> <p>CPO-49,272.47M</p>	Complied
3.8.4	<p>The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO IT platform.</p>	<p>Dola POM is currently registered on the RSPO IT platform (Palmtrace) with number RSPO_PO1000013228. The platform was assessed and there are no records of sales as the company is not yet certified to trade in RSPO certified products.</p>	Complied

Criterion / Indicator	Assessment Findings	Compliance
<p>3.8.5 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"> a) Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements. b) Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records). 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. 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>The company has documented a number of procedures to ensure effective implementation of their supply chain models. Reviewed documented procedures include:</p> <ul style="list-style-type: none"> a. Internal Audit procedures b. Supply chain procedures c. Grievance procedure <p>The site also keeps records and reports on supply chain activities. Some of the reports reviewed during the audit period include</p> <ul style="list-style-type: none"> a. Internal audit reports b. Mass Balance Production report c. Training records d. Management Review reports e. Weighbridge records f. Sales records g. Outsource reports <p>The mill manager is the person having responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. He was able to demonstrated knowledge of the procedure for the implementation of the SCC standard.</p>	<p>Complied</p>
<p>3.8.6 Internal Audit</p> <ul style="list-style-type: none"> i) The mill shall have a written procedure to conduct annual internal audit to determine whether the mill: 	<p>Dola POM has documented procedures to carry out internal audits. Reviewed procedure titled “Control and Internal Audit Procedures” dated January 2020 and referenced SOP No 10/CRS AI (04)/0120. The procedure provides the guidelines for conducting RSPO internal</p>	<p>Complied</p>

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Criterion / Indicator		Assessment Findings	Compliance
	<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>audits for the mill. The mill has conducted its internal audit on the 7/10/2021 and the report was made available for review. The internal assessment identified one NC. Reports on the internal audit was subjected to management review. Reviewed management review report dated 12/10/2021. The company maintains report on the management reviews and internal audits.</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>Dola POM source all its FFB from their certified and non-certified estates. The FFB from all the estates comes with FFB dispatch sheets. The sheet has information on the</p> <ol style="list-style-type: none"> 1. Estate (Source) 2. Date of harvest 3. Block 4. Number of bunches 5. Approximate weight <p>When the FFB arrives the information on the accompanying documents are fed into the SAP software system at the weighbridge. At the weighbridge the actual weight of the FFB are recorded.</p> <p>The company has a documented SCC procedure in place which provides guideline on the mechanism for handling certified and non-certified FFB. The procedure was made available to the audit for review.</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance
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"> a) The name and address of the buyer; b) The name and address of the seller; c) The loading or shipment / delivery date; d) The date on which the documents were issued; e) RSPO certificate number; f) A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations); g) The quantity of the products delivered; h) Any related transport documentation; i) A unique identification number. 	<p>N/A. The company is currently not certified to trade in certified CPO and PKO.</p>	<p>Not Applicable</p>
3.8.9	<p>Outsourcing Activities</p> <ul style="list-style-type: none"> iii) 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 iv) The mill shall ensure the following: 	<p>The company outsources the transportation and storage of its CPO and PKO to a third party contractor by name Gabon Special Economic Zone Ports. Reviewed the service level of agreement between the contractor and Olam Palm Gabon. The requirements of the indicator are clearly stated in an Addendum and accented to by the contractor.</p> <p>However, the original two-year contract of agreement between the company and its third party contractor for the transportation and storage of CPO and PKO was signed on 28/09/2017 and has</p>	<p>OFI</p>

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Criterion / Indicator		Assessment Findings	Compliance
	<ul style="list-style-type: none"> c) The mill has legal ownership of all input material to be included in outsourced processes d) 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. e) The mill has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor. f) 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>expired. However, the two parties have signed unto an addendum (31/07/2021) agreeing to some key requirements in the indicator and also stating that such requirements are binding while they work toward concluding on the negotiations and coming out with a final contract.</p> <p>This is raised as an OFI to monitor the progress in the finalisation of the contract in the next surveillance audit</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>The company maintains a list of all their contractors with their names and contacts. The list as seen is made of 23 contractors who transport certified FFB for the company.</p> <p>The company outsources the transportation and storage of its CPO and PKO to only Gabon Special Economic Zone Ports.</p>	Complied
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.	The company has not added to the list of its contractors for the transportation of its certified FFB	Complied
3.8.12	<p>Record keeping</p> <ul style="list-style-type: none"> 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. 	The POM maintains the records and reports of all their mill activities including training records, weighbridge tickets, sales reports and production report.	Complied

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Criterion / Indicator	Assessment Findings	Compliance
<ul style="list-style-type: none"> 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. 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. iv) For Mass Balance Module, the mill: <ul style="list-style-type: none"> 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. 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. 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>Reviewed the company's supply chain procedure and clause 6.4 (Record Keeping and Monitoring) indicates all relevant documents in relation to supply chain and Traceability certification must be kept for a minimum of 5 years.</p> <p>Reviewed Palm Products (CPO&PK) Mass balance Calculation Record Ref. Number 19. The report provides information on the production and sales of certified and non-certified CPO. The report is updated on daily basis and at the end of each month.</p>	
<p>3.8.13 Extraction Rate</p> <p>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.</p>	<p>Review of the updated Mass balance Calculation Record and its shows that the total FFB processed between September to November 2021 is 33,612.06MT and the CPO and PK production are 7958.75 MT and 1153.23 MT respectively. The OER for the CPO and PK are 23.68% and 3.43% respectively.</p>	Complied
<p>3.8.14 Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate.</p>	<p>The Extraction Rates are updated on daily basis and inventory is made on monthly basis</p>	Complied
<p>3.8.15 Processing</p>	<p>N/A</p>	Not Applicable

Criterion / Indicator		Assessment Findings	Compliance
	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.		
3.8.16	<p>Registration of Transactions</p> <p>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.</p> <p>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.</p>	Dola POM is currently registered on the RSPO IT platform (Palmtree) with number RSPO_PO1000013228. The platform was assessed and there are no records of sales as the company is not yet certified to trade in RSPO certified products.	Complied
3.8.17	<p>Claims</p> <p>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.</p>	AT the moment the company is not making claims as they are not certified.	Complied
General corporate communications			
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.	N/A The company is not certified and as such does not trade in RSPO certified oil palm products	Not Applicable
4.2	<p>In corporate communications a member is allowed to:</p> <p>a. Display its RSPO membership status</p> <p>b. Display the RSPO web address (www.rspo.org)</p> <p>c. State that the member supports the work of the RSPO</p>	N/A Same as above	Not Applicable

Criterion / Indicator		Assessment Findings	Compliance
	<p>d. State the member’s history with regard to the RSPO.</p> <p>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.rspo.org’ where the link must lead to the member’s profile page.</p>		
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.	N/A Same as above	Not Applicable
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.	N/A Same as 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.	N/A Same as above	Not Applicable
Business to business communications			
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.	N/A Same as above	Not Applicable
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.	N/A Same as above	Not Applicable
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:	N/A Same as above	Not Applicable

Criterion / Indicator		Assessment Findings	Compliance
	<p>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.</p> <p>b. If the distributor or wholesaler is supply chain-certified they should follow the requirements outlined in section 5.2.</p>		
Business to consumer communication			
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.	N/A Same as above	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.	N/A Same as 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.	N/A Same as above	Not Applicable
6.4	Business to consumer communication shall not include information about the claimant's RSPO membership status.	N/A Same as above	Not Applicable
6.5	Members shall not communicate to consumers' information about their suppliers' RSPO membership status.	N/A Same as above	Not Applicable

Criterion / Indicator		Assessment Findings	Compliance
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.	N/A Same as 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.	N/A Same as 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 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 www.rspo.org .	N/A Same as above	Not Applicable
Principle 4: Respect community and human rights and deliver benefits			
Criterion 4.1: The unit of Certification respects human rights, which includes respecting the rights of Human Rights Defenders.			
4.1.1	(C) 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	The company has a documented Human Rights policy dated 01/09/2019 and approved by the General Manager. The policy has been shared with the communities as confirmed during the	OFI

Criterion / Indicator		Assessment Findings	Compliance
	<p>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>	<p>community consultations. Copies of the policy are also displayed on the company notice boards which were observed during field visits. However, field visit to estate 16 (blocks K40-41), estate 17 (blocks L58, P53-54) and estate 18 (blocks I7/8) and interview with sampled workers established that there were no reported cases of human rights abuses during the time of the audit</p> <p>However it was observed by the audit team that some of the workers are not aware of the company's policies while others stated that the policies have been explained to them during their morning muster. This is raised as an OFI to monitor progress on the communication of the policies to reach all workers in the next surveillance audit</p>	
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>	<p>Interview with workers and the communities did not establish the use of mercenaries and paramilitaries in the operations of the company.</p>	Complied
Criterion 4.2: There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all affected parties			
4.2.1	<p>(C) 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>The company has a documented grievance mechanism titled "Procédure de gestion des Plaintes et Reclamations" referenced SOP N°07/CRS-GP (7)/0120, dated 15/01/2020 and approved the General Manager. The mechanism as reviewed outlines procedures for raising complaints for workers, communities customers and suppliers. In each case the mechanism provides the channels to raise a complaint, ensures the anonymity of complainants and provides times for addressing the complaint.</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance
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>Interview with the communities during the audit period indicates the procedure has been shared and communicated to the communities.</p> <p>During field visit and interview with sampled workers in Estate 1, 2 and 3, it was established that the procedure has been communicated to them during their morning musters. Also workers were able to demonstrate knowledge of the procedure.</p>	Complied
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>A review of the document indicates that at all time, parties involved will be informed of the progress of the case and the outcomes will be made available to the affected stakeholders.</p>	Complied
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>The procedure as reviewed indicates that complainants have the possibility of being helped or assisted by persons, institutions or groups of their choice and to have them as observers or to opt for mediation by an independent third party.</p> <p>Also complainants have the option of being assisted by one or more legal advisers of their choice.</p>	Complied
<p>Criterion 4.3: The unit of Certification contributes to local sustainable development as agreed by local communities.</p>			
4.3.1	<p>Contributions to community development that are based on the results of consultation with local communities are realised and documented.</p> <p>- Minor compliance -</p>	<p>To ensure contribution to social development, the company has a signed Social Contract which is a result of negotiation between the company and the communities. The Social Contract as reviewed was signed by the different community leaders and also by the different political administrative leaders to give it a legal status. Review of documents and interview with community leaders establish the company has initiated some developmental projects with some completed and other are on-going.</p>	Complied

Criterion / Indicator	Assessment Findings	Compliance
Criterion 4.4: 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>(C) 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>The right to legal use of land for Olam Palm Gabon was the result of an agreement between the government of Gabon and the company. Communities did not contribute land to the company's operations and there are no disputes over the land as confirmed by the communities during the audit interviews.</p> <p>Documents showing legal rights to the use of land by the company was made available to the audit team. The documents as reviewed shows right to land use was issued by the Award Decree of:</p> <ol style="list-style-type: none"> 1. Agreement N ° 52 relating to the Concession of an emphyteutic lease between the Gabonese Republic and Olam Palm Gabon, of September 14, 2016 for a period of 49 years renewable at the request of the lessee, under the provisions of article 2 paragraph 2 of Law 14/63 of May 8, 1963. The area of the permit is 146,004,920 m² (for Ndendé) 2. That of lot 3 is granted by the Gabonese Republic, represented by Head of Government (N ° 001 / MIHAT / ANUTTC) of April 22, 2015, concerning the following rural land: <ul style="list-style-type: none"> - Land with an area of approximately 24,492,963 hectares; located in the province of Moyen Ogoououé, department of Ogooué and lakes, near the village of Massika; - Land of approximately 19,596.3 hectares and 11,485.8 hectares, located in the estuary province, department of Komo at Ekouk; - Land with an area of 23,763 hectares located in Mouila, Doya Onoye department, Ngouiné province 	Complied

Criterion / Indicator		Assessment Findings	Compliance
4.4.2	Copies of documents evidencing agreement-making processes and negotiated agreements detailing the FPIC process are available and include:	<p>There are both at the level of the management of Olam and at the level of the chiefdoms of the village communities visited as part of the public consultations (Mbadi, Mounigou, Ferra, Moutassou ...), visited as part of the public consultations, copies of the agreements negotiated as part of the implementation activities of the Olam company in their areas. These agreements were established following a series of official steps summarized as follows:</p> <ul style="list-style-type: none"> • Studies (social and environmental) carried out by TERE, a Gabonese law firm, created in 2005, working on issues relating to the environment in tropical environments; • Public consultations which consist in involving the affected communities in the negotiations and in the identification of • Validation of studies; • Explanation sessions of the FPIC process to authorities and populations; • Sessions for the explanation and validation of procedures (conflict management, communication, compensation, etc.); • The establishment of monitoring and evaluation committees; • Presentation of the impacts of the project; • Creation of steering committees, with the involvement of the authorities for monitoring implementation; • Negotiation of specifications and signatures, pooling of agreements. 	Complied
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,	The documentary review at the administrative level of Olam showed that according to Gabonese law, land belongs to the state which grants it to a third party claimant who becomes acquirer, for enjoyment.	Complied

Criterion / Indicator	Assessment Findings	Compliance
<p>including information on the steps that are taken to involve them in decision making.</p> <p>- Minor compliance -</p>	<p>This right of use over land granted by the State is supported by legal documents (emphythéotique lease, land titles, etc. allocation decrees) and however has restrictions:</p> <p>The purchaser must take into account the interests of the communities which constitute the customary right of use which authorizes the villagers to practice their subsistence activities (fishing, gathering and hunting) as well as the enjoyment of sacred sites (HVC, ancient villages, cemetery, places of worship...).</p> <p>This provision is supported by a regulation on customary use rights on the Olam Palm sites, in accordance with Law No. 16/2001 of December 31, 2001, establishing the forestry code in the Gabonese Republic.</p> <p>This restriction therefore justifies the consultations organized by Olam within the framework of the CLIP (Free Prior Informed Consent).</p> <p>The reports of the various consultations for participatory maps were provided during the audit, along with evidence of participation from affected parties.</p> <p>Thus, the validation dates of participatory acrtes are as follows:</p> <ul style="list-style-type: none"> -Moutassou: February 15, 2015; -Mbengui and Mbadi: February 16, 2015; -Ferra: February 09, 2016; -Mounigou: May 11, 2016. 	
<p>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.</p> <p>- Minor compliance -</p>	<p>The FPIC consultation reports, together with evidence of participation and agreement of affected parties to accept Olam operations were presented to the auditor.</p>	<p>Complied</p>

Criterion / Indicator		Assessment Findings	Compliance
		<p>During the consultations, a presentation of participatory social mapping of villages, Olam's commitment to respect areas of village community interest and confirmation from affected parties that they have accepted Olam's presentation on their lands and will not lead no activity likely to disrupt the performance of Olam's activities.</p> <p>The only community that has not given its agreement to be part of the Olam permit (project) is the village of Mbengui, in the canton of North Dola (report of the presentation report and validation of the participatory mapping of February 16, 2015 + attendance list).</p>	
4.4.2c	<p>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 status of their land at the expiry of the unit of certification's title, concession or lease on the land.</p> <p>- Minor compliance -</p>	<p>Detailed reports presented on the process of land acquisition and use were presented to the auditor.</p> <p>The examination of the different stages shows that the legal, economic, environmental and social implications regarding the operations permitted on their lands have been understood and accepted by the affected communities.</p> <p>The agreements were established following a series of official steps which could be summarized as follows:</p> <ul style="list-style-type: none"> • Studies (social and environmental) carried out by TERE, a Gabonese law firm, created in 2005, working on issues relating to the environment in tropical environments; • Public consultations which consist in involving the affected communities in the negotiations and in the identification of • Validation of studies; • Explanation sessions of the FPIC process to authorities and populations; 	Complied

Criterion / Indicator		Assessment Findings	Compliance
		<ul style="list-style-type: none"> • Sessions for the explanation and validation of procedures (conflict management, communication, compensation, etc.); • The establishment of monitoring and evaluation committees; • Presentation of the impacts of the project; • Creation of steering committees, with the involvement of the authorities for monitoring implementation; Negotiation of specifications and signatures, mutualization of agreements.	
4.4.3	<p>(C) 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).</p> <p>- Critical (Major) compliance -</p>	OPG-Dola POM has map showing legal rights to the use of the land and was made available to the audit team for review. The maps were developed in consultation and participation of the communities as confirmed by the communities during the community consultations. Also review of the company's social impact assessment report all established the participation of the communities in the development of the map.	Complied
4.4.4	<p>All relevant information is available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements.</p> <p>- Minor compliance -</p>	French is the official spoken and written language in Gabon and as such all documents shared with the communities, workers and displayed on company's notice boards are written in French. However, interview with the workers in the plantations and communities all indicated that all relevant information are explained to their understanding.	Complied
4.4.5	<p>(C) 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.</p> <p>- Critical (Major) compliance -</p>	Communities during the consultations all indicated they are represented by their traditional leaders who speaks and takes decisions on the communities behalf. The leaders in consultations with the communities can also appoint some people such as women representatives and youth leaders to represent the communities on	Complied

Criterion / Indicator		Assessment Findings	Compliance
		some specific issues. The companies also maintains a list of all such leaders with their contacts and can be reached when needed.	
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>The management of Olam Palm Gabon produced the report of the steering committee, which is the committee in charge of evaluating the implementation of actions defined in the specifications resulting from the social contract.</p> <p>A clear steering committee report has been drawn up, with the tripartite participation of Olam, impacted communities and legal authorities to conduct the assessment activities. The summary, the attendance lists and the schedule for carrying out the activities of the specifications are available.</p> <p>Initially, three meetings per year were held. However, due to the covid 19 pandemic, the frequency of meetings has been reviewed annually; in a fragmented way: village by village, and not grouped, for the respect of barrier measures.</p>	Complied
<p>Criterion 4.5: 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>(C) Documents showing identification and assessment of demonstrable legal, customary and user rights are available.</p> <p>- Critical (Major) compliance -</p>	<p>The social and environmental study report, led by the research firm TERE, participatory mapping, conducted and carried out by the Institute for Research and Tropical Studies (IRET), in agreement with the affected communities, to identify their activity zones (fishing, gathering, hunting), sites of cultural importance (cemetery, churches, etc.), the social contract between the management of Olam Palm Gabon and the affected communities, public consultation reports, steering committee, are all records, documented evidence that demonstrate the identification and assessment of legal, customary and use rights.</p>	Complied

Criterion / Indicator	Assessment Findings	Compliance
<p>4.5.2 (C) 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>- Critical (Major) compliance -</p>	<p>At the management level of Olam Palm Gabon, for the scope of the audit, there is a public consultation report in the various communities impacted in a Free Prior Informed Consent process.</p> <p>This activity report allows us to note that the management of Olam has exposed to the various communities its duty to take into account their community interests for certain sites of social and cultural importance. Thus, to ensure and ensure that the FPIC is valid for the entire duration of the oil palm development program and that it will be implemented, in accordance with the agreements made between Olam and the affected communities, a committee of piloting (made up of representatives of the communities, village, political and administrative authorities and independent organizations) whose essential mission consists of monitoring evaluations and the implementation of the specifications, is in place. Several activity reports in place show the effectiveness of their actions in the field, as part of project monitoring.</p>	<p>Complied</p>
<p>4.5.3 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>	<p>The right to reject planned operations on their lands before and during initial discussions, during information gathering and associated consultations, throughout negotiations, and until the signing and ratification by these local populations of an agreement with the certification unit is demonstrated by all the procedures undertaken by the Olam Palm Gabon Company since the project in 2015 to now.</p> <p>The realization of a participatory mapping, following a social and environmental impact study. The results were presented publicly to the affected communities for the purpose of speaking out and providing observations, refusals, as was the case with Mbengui. The consultation activity reports are in place to demonstrate this.</p>	<p>Complied</p>

Criterion / Indicator		Assessment Findings	Compliance
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>	<p>The review of the participatory mapping (carried out by IRET: Institute for Research and Tropical Studies in April 2015), verified in the social impact study report (conducted and carried out by TERE, a research firm of Gabonese law), shows that livelihood zones were identified, assessed by communities who themselves took part in field activities, then abandoned by Olam to allow affected populations to practice their subsistence activities: gathering, fishing and hunt.</p> <p>Interviews with village communities and the review of the Social Impact Assessment demonstrated that Olam management involved communities in discussions and in identifying areas sensitive to their survival, for the production of subsistence crops.</p> <p>Thus, areas or sites which prove to be of undeniable importance for the riverside are spared for their well-being</p>	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>	<p>Monitoring the implementation of social agreements involves the intervention of the legal authorities duly established by the Gabonese Republic. Negotiations are also by these authorities to ensure that the specifications are executed in accordance with the agreements. As a result, the affected parties have had the possibility of accessing information and advice, independently of Olam Palm Gabon, by contacting entities of their choice, according to their interests and positions on certain subjects of importance to them.</p> <p>In communications and other forms of information that The Olam Palm Company maintains with affected communities, affected parties are advised that they may be assisted by legal entities of their choice.</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance
		This is the case of the village of Mbadi which has enlisted the services of the Word Wild Foundation as part of a study to determine the limit of the community forest it wants to enjoy. The representatives are still waiting for the results of this study to initiate certain discussions with Olam Palm Gabon.	
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>PROCEDURAL NOTE: 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> <p>- Minor compliance -</p>	<p>Activity reports:</p> <ul style="list-style-type: none"> -social agreements; -public consultations; -validation of studies; -explanation of procedures; <p>- the negotiations of the specifications... show that the populations have been involved, consulted in the process of identifying the activity zones which represent for them, areas of subsistence for the practice of fishing, gathering and the hunt.</p> <p>Interviews with affected communities did not indicate a contrary approach.</p>	Complied
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>PROCEDURAL NOTE: 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>	<p>A review of the participatory mapping and action areas of Olam Palm Gabon, coupled with cross-interviews with communities and Olam Palm Gabon management, show that since 2015, there has been no extension; no new plantations were created.</p> <p>None of the communities visited complained or reported the creation of a new plantation in their area without their participation, apart from Olam Palm Gabon operating license.</p> <p>All units visited in the scope of the audit fall under the permit granted to Olam Palm Gabon by the State of Gabon</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance
4.5.8	<p>(C) New lands are not acquired in areas inhabited by communities in voluntary isolation.</p> <p>- Critical (Major) compliance -</p>	<p>No evidence of new land acquisition in areas inhabited by communities in voluntary isolation was found.</p> <p>The map of mining areas does not show any new acquisitions, compared to the permit that was granted to Olam Palm Gabon.</p>	Complied
<p>Criterion 4.6: 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>(C) 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>	<p>The legal and customary rights of affected communities and people are identified during the execution of participatory mapping; generally.</p> <p>After participatory mapping; the management carries out an assessment of fruit trees and sites of benefit to members with the ministry of agriculture.</p> <p>In the event of accidental destruction or for the implementation of the project, the management calls on the Ministry of Agriculture, which assesses the destruction on the basis of a price list per crop and age of cultivation. Based on this scale, an invoice is drawn up to compensate the people concerned.</p> <p>At the start of the project, the group's management distributed a copy of this scale which is taken by decree N ° 1016 / PR / MAEPDR fixing the scale of compensation to be paid in the event of the voluntary destruction of crops, livestock, buildings. farming, fish ponds or fishery resources.</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance
		A binder making it possible to trace all the compensatory indemnities linked to cases of destruction is available. Evidence from activity reports shows that several producers have been compensated for complaints about the theft and destruction of their food crops.	
4.6.2	<p>(C) 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>	The calculation procedure for the compensation for the procedures and the calculation methods are pre-established and fixed by law, in particular by decree N ° 1016 / PR / MAEPDR fixing the scale of compensation to be paid in the event of voluntary destruction of crops, livestock. , livestock buildings, fish ponds u fishery resources. officiellmenet disseminates and accessible to all Gabonese by publication on social networks, in newspapers ...	Complied
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>PROCEDURAL NOTE: In Gabon, land belongs to the State. For this reason, operators have no influence on the allocation of land titles.</p> <p>- Minor compliance -</p>	The country's local interpretation notes that the land belongs to the state, which grants it to an applicant, on the procedure it takes. The company therefore has no possibility of influencing or impacting this process whereby men and women have the same opportunities to hold land titles in the context of smallholder farms.	Not Applicable
4.6.4	<p>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.</p> <p>- Minor compliance -</p>	<p>The steering committee's report, based on social agreements with the communities which constitute the bulk of their requests, according to the compensation needs expressed, is available to demonstrate that the needs of the affected communities have been identified, discussed, with their representatives. authorities and the representatives they have elected.</p> <p>These agreements have been made since 2016 and periodic reports are drawn up to assess the state of play of the specifications.</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance
		The steering committee's evaluation activity reports are available to the communities.	
Criterion 4.7: 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	<p>(C) A mutually agreed procedure for identifying people entitled to compensation is in place.</p> <p>- Critical (Major) compliance -</p>	<p>The management of Olam Palm Gabon has a policy allowing the identification of those entitled to compensation.</p> <p>The procedure begins with a process for addressing complaints or requesting compensation for damage or injury suffered for destruction or degradation of property or crops on the part of Olam Palm Gabon.</p> <p>Then, after having acknowledged receipt, Olam diligently, with the participation of the complainant for confirmation that the damage or destruction is due to Olam Palm Gabon.</p> <p>With regard to compensation measures, the management of Olam is assisted by the Ministry of Agriculture which, on the basis of a scale set by decree No. 1016 / PR / MAEPDR fixing the scale of compensation at pay in the event of deliberate destruction of crops, livestock, livestock buildings, fish ponds or fishery resources.</p> <p>The damage is therefore assessed on the basis of the scale, with the knowledge of the complainant and reparation is made, with all the records provided for by the procedure:</p> <ul style="list-style-type: none"> - compensation point; - letter of discharge that the complainant has actually received compensatory compensation. 	Complied
4.7.2	<p>(C) A mutually agreed procedure for calculating and distributing fair compensation (monetary or otherwise) is in place and documented and made available to affected parties.</p>	<p>The procedure for calculating and distributing fair compensation for the compensation of the parties affected by the project is framed by law, in particular by decree N ° 1016 / PR / MAEPDR fixing the</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance
	- Critical (Major) compliance -	scale of compensation to be paid in the event of voluntary destruction. crops, livestock, livestock buildings, fish ponds or fishery resources. This scale is available at the level of the management of Olam Palm Gabon and accessible by way of distribution on the internet and in the official journal.	
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 -	The review of the participatory mapping and the public consultations carried out with the various communities encountered, did not mention any case of a community having lost access and rights as part of the expansion of the plantations.	Complied
Criterion 4.8: 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 -	The management of Olam Palm Gabon presented the legal documents which support its right to use the land it exploits and which have been verified as part of the scope of the audit. The examination of the documents clearly shows that the granting of the land falls under the competence of the State which is the principal owner, while recognizing the customary right of use of the populations. No dispute over the land occupied within the perimeter of the Olam Palm Gabon permit was neither recorded nor denounced during public consultations with affected communities. The only community that has refused to use its land, within the scope of the Olam Palm Gabon permit, is that of Mbengui (reports and attendance lists of February 16, 2016).	Complied

Criterion / Indicator		Assessment Findings	Compliance
		<p>In reaction, Olam Palm Gabon took this community out of its operating perimeter and it was considered as a community not impacted by the project.</p> <p>this law has been replaced by Law No. 16/2001 relating to the forestry code in the Gabonese Republic, repealing any distance to be observed in relation to possible dwellings in the license of an acquirer.</p> <p>As a reminder, the Olam Palm Gabon Company is subject to the agricultural code and not to the forestry code.</p>	
4.8.2	<p>(C) 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>No cases of land conflict have been identified or reported.</p> <p>A review of FPIC reports found no conflict with a community.</p> <p>Olam Palm Gabon has a permit to exploit the land where its plantations are located. The mining areas are not the subject of any dispute or dispute, as it is the State, as the owner of the legal who made the transfer.</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>No evidence of acquisition through dispossession or forced relinquishment of customary and use rights prior to current operations has been identified.</p> <p>The participatory mapping and FPIC reports made no mention of any situation relating to the dispossession or abandonment of customary rights in a given community.</p>	Complied
4.8.4	<p>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).</p> <p>- Minor compliance -</p>	<p>The consultations carried out with the communities met during the audit did not raise any disputes relating to disputes over the use of land granted to Olam Palm Gabon, within the framework of its permit which was granted to it by the 'Gabonese State.</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance
Principle 5: Support smallholder inclusion			
Criterion 5.1: 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 -	The company source all its FFB from their estate and has no smallholders or outgrowers in their supply base	Not Applicable
5.1.2	(C) Evidence is available that the unit of certification regularly explains the FFB pricing to smallholders. - Critical (Major) compliance -	As stated above	Not Applicable
5.1.3	(C) Fair pricing, including premium pricing, when applicable, is agreed with smallholders in the supply base and documented - Critical (Major) compliance -	As stated above	Not Applicable
5.1.4	(C) 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 -	As stated above	Not Applicable
5.1.5	Contracts are fair, legal and transparent and have an agreed timeframe. - Minor compliance -	As stated above	Not Applicable
5.1.6	(C) Agreed payments are made in a timely manner and receipts specifying price, weight, deductions and amount paid are given. - Critical (Major) compliance -	As stated above	Not Applicable

Criterion / Indicator		Assessment Findings	Compliance
5.1.7	Weighing equipment is verified by an independent third party on a regular basis (this can be government). - Minor compliance -	As stated above	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 -	As stated above	Not Applicable
5.1.9	(C) The unit of certification has a grievance mechanism for smallholders and all grievances raised are dealt with in a timely manner. - Critical (Major) compliance -	As stated above	Not Applicable
Criterion 5.2: 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 -	As stated above	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 elements of RSPO certification (including the RSPO Standard for Independent Smallholder). PROCEDURAL NOTE:	As stated above	Not Applicable

Criterion / Indicator		Assessment Findings	Compliance
	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). - Minor compliance -		
5.2.3	Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production. - Minor compliance -	As stated above	Not Applicable
5.2.4	(C) Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling. - Critical (Major) compliance -	As stated above	Not Applicable
5.2.5	The unit of certification regularly reviews and publicly reports on the progress of the smallholder support programme. - Minor compliance -	As stated above	Not Applicable
Principle 6: Respect workers' rights and conditions			
Criterion 6.1: Any form of discrimination is prohibited.			
6.1.1	(C) 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. - Critical (Major) compliance -	The company has a policy of combating discrimination of all kinds within its operations and it was made available to the audit team for review. The scope of the policy covers both workers of Olam and also their 3 rd party contractors. The policy is implemented through the Gender Committee who are mandated to take complaints and investigate all issues of discrimination in the company	Complied
6.1.2	(C) 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.	During field visit and interview with workers in Estate 16 (block K40-41, K45-46), Estate 17 (block L58, P53-54) and Estate 18 (block K60-62) all confirmed that there are no cases of discrimination in the company.	Complied

Criterion / Indicator		Assessment Findings	Compliance
	- Critical (Major) compliance -		
6.1.3	<p>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.</p> <p>- Minor compliance -</p>	<p>The company has a policy on the recruitment process for selection, hiring, access to training and promotion. The documented process was made available to the audit team for review. The process for the recruitment begins with the advertisement of the vacant position. Qualified applicants are shortlisted for interviews. The successful candidate are is subjected to medical check-up and after a successful medical review a contract is drawn and signed by both parties. The new recruit is then taking through an induction process to inform the workers on the company's policies and procedures. Review of the personal files of five sampled workers confirmed their recruitment was consistent with the company's procedures.</p>	Complied
6.1.4	<p>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.</p> <p>- Minor compliance -</p>	<p>Interview with female workers in estates 16,17 and 18 all indicated that pregnancy testing is conducted prior to employment as a sprayer or chemical applicator and periodically in the course of working with chemicals. However, they indicated that this is a precautionary measure to prevent pregnant workers from handling chemicals. Chemical applicators found to be pregnant are transferred to other sector for their safety but not as a discriminatory measure.</p>	Complied
6.1.5	<p>(C) A gender committee is in place specifically to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women.</p> <p>- Critical (Major) compliance -</p>	<p>The company has a Gender Committee in place established in September 14, 2017. The objectives of the Gender Committee includes:</p> <ol style="list-style-type: none"> 1. fight against sexual harassment, moral harassment; 2. fight against discrimination; 3. investigate complaints filed; 4. protect reproductive rights of women 	Complied

Criterion / Indicator		Assessment Findings	Compliance
		<p>5. fight against all forms of abuse</p> <p>The committee is made up of 6 members who conducts sensitization programs at periodic intervals.</p>	
6.1.6	<p>There is evidence of equal pay for the same work scope and provision of similar necessary working tools.</p> <p>PROCEDURAL NOTE:</p> <p>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>The company issues payslips to each worker at the end of each month prior to the payment of salaries. Sampled payslips of the workers was made available to the audit team. During the review of the payslips it was established that some employees belonging to the same work category and doing same work have different base salary. This was the case of workers in category AM2AA with employee codes 008260 and 000546 but have different basic salaries of 333,000 CFA against 213,000 CFA</p>	Non-compliance
<p>Criterion 6.2: 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).</p>			
6.2.1	<p>(C) 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>PROCEDURAL NOTE:</p> <p>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>The company has a list of job categories for workers employed which also indicate the salary for each category. The document was made available for review. It was observed during review of the category list that some workers has been assigned categories that do not exist in the list. For instance, the job category for Human Resource assistant is OE6 on the company's Job categorization list. However, a review of the payroll showed the assigned category for the Human Resource Assistant (046980) is OE7 which is not found in the List of Job Categorization.</p> <p>Similarly, during interview at the workshop a worker has his job description as a storekeeper under category OE3 (with accompanying salary) which does not exist on the List of Job</p>	Non-compliance

Criterion / Indicator		Assessment Findings	Compliance
		<p>Categorization and he is actually performing task under category OE5</p> <p>The audit team also came across a case of a workers (with registration 019450) who has serves more than six months on probation as against the required one month for agricultural workers in compliance with the Gabon Labour Act -49.</p>	
6.2.2	<p>(C) 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.</p> <p>- Critical (Major) compliance -</p>	<p>Workers upon appointment are issued contract documents. A review of sampled contract documents contains information on salary, working hours, holiday entitlement, reasons for dismissal and many more. Also workers at the end of each month are issued payslip which provides information on the working hours, amount earned, deductions and many more. Interview with workers in Estate 16 (block K40-41, K45-46), Estate 17 (block L58, P53-54) and Estate 18 (block K60-62) established that the document give accurate information on compensation for all work done.</p>	Complied
6.2.3	<p>(C) 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>Review of a sample of workers files established that some labour requirements are not adhered to. It was observed that the basic salaries of some lower category workers were higher than the salary of workers who occupy relatively higher work category. The list is as follows AM1, AM2, AM3, AM4 in increasing order of seniority. Thus a worker in AM2 category is above a worker in AM1 category. Evidence identified include</p> <p>1. 041617 (AM1AA): 280,000 CFA 000543 (AM2AA): 213,000 CFA</p>	Non-compliance

Criterion / Indicator		Assessment Findings	Compliance
		<p>2. 008260 (AM2AA): 333,000 CFA 012751 (AM4AA): 299,000 CFA</p> <p>The audit team also identified cases where workers has been relocated from their original work locations to new areas of workers without the accompanying salaries and benefits. Samples evidence include agricultural workers in category OE1AA moved to work as security guards and storekeepers with categories of OE2AA and OE5 respectively</p>	
6.2.4	<p>(C) The unit of certification provides adequate e, 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. - Critical (Major) compliance -</p>	<p>The company has made housing allocations to some of their workers (permanent and contract workers). Allocation of housing is guided by the company’s internal social policy. Workers who are not able to secure housing from the company are giving monthly housing allowance to rent from the neighbouring communities.</p> <p>Field visit to the workers housing shows workers are also provided with sanitation facilities, water supply. The company also has a medical facility with a resident doctor to attend to the workers medical needs.</p>	Complied
6.2.5	<p>The unit of certification makes efforts to improve workers’ access to adequate, sufficient and affordable food. - Minor compliance -</p>	<p>To ensure workers have access to adequate and affordable food, the company has set up a commission store to make food products and other essential good available to the workers. Also the company through their social services has set up a price mechanism for the control of food prices to avoid price hikes.</p> <p>In addition to the above the company provides transportation twice every week for workers to visit the cities for their shopping.</p>	Complied

Criterion / Indicator	Assessment Findings	Compliance
<p>6.2.6 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>PROCEDURAL NOTE: 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)</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 exist¹.</p> <p><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></p> <p>In the absence of such benchmarks, the RSPO will collaborate with the GLWC and/or local experts on developing oil palm industry benchmarks². 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><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 Wage³.</i></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"> • Updated assessment on prevailing wages and in-kind benefits 	<p>Gabon currently has not calculated its DLW. However, the company has conducted an assessment to determine the prevailing wage it is paying to the workers. The assessment as reviewed is based on the national minimum wage in addition to all the in-kind benefit that the company is giving out to the workers on site their plantation and off site in the nearby towns and communities. The in-kind benefits include electricity, housing, transportation, medical health and school (education).</p> <p>The country has set its national minimum wage at 150,000 CFA and when all the in-kind benefits are added, the company is paying a basic salary of 310,617 CFA for each workers on site the company’s plantation and 220,619 CFA for each workers staying in the community. Their in-kind benefits excludes electricity and water.</p>	<p>Complied</p>

Criterion / Indicator		Assessment Findings	Compliance
	<ul style="list-style-type: none"> There is annual progress on the implementation of living wages 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 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. <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>	<p>The company engages two categories of workers in their operations. These are permanent workers who are directly employed by the company and the contract workers who are recruited by third party contractors. Review of sampled contracts and payslips for contract and permanent workers establishes that they work full time. Also during field visit and interview with sampled workers in plantation confirmed compliance.</p>	Complied
<p>Criterion 6.3: 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>(C) 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>The company has a published statement recognizing the freedom of association and the rights to collective bargaining and approved by the General Manager. The document is written in French which is the official language in Gabon. However, interview with the workers indicated the content of the document has been clearly explained to them during the musters.</p> <p>Currently there exist a workers union with their elected representatives who ensures the rights of workers are protected at all times. They also engages with the management of OPG-Dola POM on workers working conditions and welfare. Interview with</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance
		workers and their representatives indicates there are no management interference in the operations of the union.	
6.3.2	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. - Minor compliance -	Management of OPG-Dola holds periodic meetings with the workers representatives and also whenever necessary. There are reports on minutes of meeting with attendance records for every meeting held and copies are signed and shared by both parties. Copies of the minutes of meetings which were written in French were seen and reviewed.	Complied
6.3.3	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. - Minor compliance -	As indicated in 6.3.1 above	Complied
Criterion 6.4: Children are not employed or exploited.			
6.4.1	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. - Minor compliance -	OPG-Dola POM has a documented policy for the protection of children including the fight against trafficking, smuggling and all forms of violence against children. The policy as seen is approved by the General Manager and displayed on the company's notice boards. Reviewed contract of agreement between the company and Clement Plus GT, Frankline Services, Elu Services Du Gabon and Adams Services Ndende. All contains clauses on disallowing child, forced and trafficked labour. Also during field visit, there was no observation made of children working in the fields and interview with sampled workers indicates the policy has been explained to them during induction and at their morning musters.	Complied

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Criterion / Indicator		Assessment Findings	Compliance
6.4.2	<p>(C) 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.</p> <p>- Critical (Major) compliance -</p>	<p>During recruitment of workers (both permanent and contract) for OPG operations, the company requires workers to present identification documents for the verification of their ages. The country's legal minimum working age is 18 years and review of sampled workers files did not identify any worker below 18 years.</p> <p>During filed visit to the plantations and interview with workers did not identify any worker below the minimum working age.</p>	Complied
6.4.3	<p>(C) Young workers (between 16 and 18 years old) are not employed in RSPO certified companies in Gabon. The minimum age is 18 years old.</p> <p>- Critical (Major) compliance -</p>	<p>The company does not employ young workers in their operations. Review of sampled workers files and interview with workers in the filed establish compliance to the indicator.</p>	Complied
6.4.4	<p>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.</p> <p>- Minor compliance -</p>	<p>The company has a no child labour policy which is displayed on the company's notice boards. Interview with workers indicates the policy has been communicated to them at their morning musters. Also during stakeholders consultations with the communities and third party contractors, they did confirm the policy has been share with them and communicated to their understanding.</p>	Complied
<p>Criterion 6.5: There is no harassment or abuse in the workplace, and reproductive rights are protected.</p>			
6.5.1	<p>(C) A policy to prevent sexual and all other forms of harassment and violence is implemented and communicated to all levels of the workforce.</p> <p>- Critical (Major) compliance -</p>	<p>OPG (Olam Palm Gabon) has a documented policy to prevent sexual harassment and all other forms of harassment and approved by the General Manager. The policy has been displayed on the company's notice boards. Copies of the policy has been shared with the communities and the third party contractors who indicated the policy has been communicated to their understanding.</p> <p>Interview with sampled workers all confirmed the policy is communicated to them during induction and at their morning musters</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance
6.5.2	<p>(C) 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>OPG has a documented Reproductive policy which is approved by the General Manager. The policy has been displayed on the company's notice boards. Interview with sampled workers all confirmed the policy has been communicated to them during induction and at their morning musters</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>Management through the activities of the Gender Committee engages with the new mothers to assess their needs and make provisions that addresses such needs. Interview with some female workers during field visit indicates the Gender Committee through their activities meets with new mothers. Records of some of such meetings were made available for review.</p>	Complied
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>OPG has a documented grievance mechanism captioned "PROCEDURE DE GESTION DES PLAINTES ET RECLAMATIONS" last revised in January 2020 and approved by the vice president of OPG. The purpose of this mechanism is to define the mode of handling complaints made against or addressed to Olam Palm Gabon.</p> <p>A mechanism as reviewed ensures the anonymity and protects complaints by providing a various means of registering your complaints.</p> <p>Interview with the workers indicates the grievance mechanism has been explained to them during their morning muster.</p> <p>To implement the mechanism, the company makes available a number of mechanism for submitting complaints. They include the use of form, letters, orally or sent by email to the Human Resources department or directly to the social service or through village representatives. The company has also made a list of emails available for use by the complainants</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance
Criterion 6.6: No forms of forced or trafficked labour are used.			
6.6.1	<p>(C) All work is voluntary and the following are prohibited:</p> <ul style="list-style-type: none"> • Retention of identity documents or passports • Payment of recruitment fees Contract substitution Involuntary overtime. • Lack of freedom of workers to resign • Penalty for termination of employment • Debt bondage • Withholding of wages <p>- Critical (Major) compliance -</p>	Interview with sampled workers indicates all work is voluntary as workers are not required to pay any recruitment fees or any of the issues identified by the indicator.	Complied
6.6.2	<p>(C) Where temporary or migrant workers are employed, a specific labour policy and procedures are established and implemented.</p> <p>- Critical (Major) compliance -</p>	Review of documents and interview with the workers did not identify any temporal or migrant workers in OPG operations.	Complied
Criterion 6.7: The unit of certification ensures that the working environment under its control is safe and without undue risk to health.			
6.7.1	<p>(C) The responsible person(s) for H&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>	The company has identified Mr Hernandez Ngodduma as the responsible person for H&S issues. Appointment letter with a job description confirming the position was made available for review. The health and Safety person work with a H&S committee which comprises of persons from each department in a meeting which is held quarterly. At those meetings concerns of the workers that were taking during departmental health and safety meetings are discussed. Reviewed records on the minutes of meeting by the committee captioned Premiere Reunion Du CSST dated 6/03/2020 with a list of attendance attached.	Complied

Criterion / Indicator		Assessment Findings	Compliance
		<p>The meetings with the workers takes the form of training, awareness and sensitisation on Health and Safety issues. Records of such meetings were made available for review including the concerns of workers. In one instance a workers complained about the closeness of the acetylene tank to a hot surface area. Workers also wanted to know if antibiotics can be administered during first aid. Some evidence of meetings with workers</p> <p>6. Sensitization on Safety and Road Instruction and Road Policy Date: 07/10/2021 Site: Ndende Attendance: 3 Drivers</p> <p>7. Minutes of meeting on the HSE Instruction to Minimise Accident Risk in the Plantation during fertilizer application Date: 4/11/2021 Site: Ndende Attendance: 9 workers</p>	
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>The company has identified different emergency situations in their operational areas to include fire, accident, spillage of fuel, chemical contamination and in each the company has developed and documented procedures in place. Sampled emergency procedures were made available for review. Copies of the procedures has been made available at the various working sites.</p> <p>During field visits to Estate 16 and 17 (K40-41, L58) trained first aid personnel with their first aid kits were observed at the site. An inspection of the kits shows items including bandage's, spirit, plaster and gauze which they use to administer first aid when there is an</p>	OFI

Criterion / Indicator		Assessment Findings	Compliance
		<p>accident on site before seeking secondary health treatment at the company’s clinic on site. Interview with the company doctor indicates he provides training to the first aiders and every two years gives a refreshers training. Training is also conducted for new recruits as first aiders. Records of training and the list of attendance was made available for review. The list of first aiders on the plantations and interviewed by the audit team were found to be part of the training.</p> <p>The first aiders have a recoding form in which all accidents on site and first aid provided are to be recorded and submitted to the Clinic. However, at Ndende although the first aiders had the forms, none has been filled at the time of the audit. A visit to the clinic and interview with the resident doctors showed samples of received filled accident forms from Lot 3. This is raised as an OFI to monitors the progress on recording from Ndende in the surveillance audit next year.</p>	
6.7.3	<p>(C) 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>Field visit to Estate 16 and 17 (K40-41, L58) show workers (harvesters, fertilizer applicators and pesticide sprayers) all using their appropriate PPEs. Interview with both the contract workers and Olam workers all indicate the PPEs were supplied to them for free.</p> <p>The company has also made available sanitation facilities for pesticide applicators so that workers can change out of PPE, wash and put on their personal clothing. The structure currently in use is a temporal one as describe by the sustainability manager. The audit team reviewed the design for the new building facility the company intend to put up. Also the budget allocated for the building was made available for review.</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance
6.7.4	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. - Minor compliance -	In Gabon all citizens including Olam workers are covered by a national health insurance. However, the company has established clinics within its premises which provides first aid care to all workers and families for free. Also the country has a National Insurance Policy covers all workers and their families. However, the company has a residential clinic that provide first aide to their workers and families and the cost of treatment is then borne by the government insurance agency. In the event of an accident, the company by the national law is required to provide 24 hours' health service to ensure the life of the worker is secured and after which they government take care of the rest. Each month the company make contribution to the government in the form of CNSS which covers payment for social security, maternity leave and accident insurance.	Complied
6.7.5	Occupational injuries are recorded using Lost Time Accident (LTA). - Minor compliance -	Reviewed an excel report captioned "Plantations HSE Lagging Key Safety Indicator". The report shows the calculations for the occupational injuries using the LTA. The report has been updated from Jan to Oct and the total LTA recorded is 104 for all worker including contract workers	Complied
Principle 7: Protect, conserve and enhance ecosystems and the environment			
Criterion 7.1: Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management (IPM) techniques.			
7.1.1	(C) IPM plans are implemented and monitored to ensure effective pest control. - Critical (Major) compliance -	OPG Ndende has identified elephants and leaf eaters as the major pest and has developed strategies to curb them. For elephant intrusion, the strategy captioned: Olam Palm Gabon – Elephant Control, Reviewed Strategy and Structure to Efficiently Address Crop Destruction, version 4, November 2018. This strategy includes actions such as digging of trenches around the plantation, erection of fences and barbed wire to prevent elephant intrusion	Complied

Criterion / Indicator		Assessment Findings	Compliance
		<p>Additionally, as part of IPM, OPG is planting beneficial plants such as <i>tunera</i>, which invite predators that control the population of leaf eaters (such as nectar caterpillar).</p> <p>In Estate 18, Ndende, a plan to plant beneficial plant (<i>tunera</i>) was seen during the audit. Planting of a total area of 2457.53ha is foreseen. 60Ha have been planted at the time of the audit.</p> <p>For estate 17, 2000ha have been planted.</p> <p>Meanwhile OPG is currently testing other beneficial plants such as <i>mucuna brateata</i>, of which 100ha planted.</p>	
7.1.2	<p>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.</p> <p>- Minor compliance -</p>	<p>Species referenced in the Global Invasive Species Database and CABI.org are not used in the unit of certification.</p>	Complied
7.1.3	<p>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].</p> <p>- Minor compliance -</p>	<p>Interview with workers and field observation did not establish the use of fire by the company for pest control.</p>	Complied
Criterion 7.2: Pesticides are used in ways that do not endanger health of workers, families, communities or the environment.			
7.2.1	<p>(C) Justification of all pesticides used is demonstrated. Selective products and application methods that are specific to the target pest, weed or disease are prioritised.</p> <p>- Critical (Major) compliance -</p>	<p>OPG has developed Agriculture Policy Manuals Volume 1 and Volume 2 (of April 2013). According to Chapter 9 of the Manual titled "Immature Maintenance and Ablation", pesticide use is specific to the target pest, weed or disease.</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance														
		Meanwhile, Chapter 15 of the Manual covers Integrated Pest & Disease Management Practices.															
7.2.2	<p>(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>At OPG, records of pesticides used are kept (document number: PRP-EN02; Issue Number 1, of 05/10/2017. A review of this document revealed that records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredient are kept by agronomy department. The records for different estates of Lot 3 and Ndende were seen during the audit and are presented as shown in the table.</p> <table border="1" data-bbox="1144 730 1917 815"> <thead> <tr> <th>Herbicides</th> <th>WHO Class</th> <th>LD50 (oral) mg/Kg</th> <th>LD 50 (inhalation) Mg/l</th> <th>LD50 (dermal) mg/Kg</th> <th>Active ingredient</th> <th>Area treated per month up to October</th> </tr> </thead> <tbody> <tr> <td></td> <td>3</td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table>	Herbicides	WHO Class	LD50 (oral) mg/Kg	LD 50 (inhalation) Mg/l	LD50 (dermal) mg/Kg	Active ingredient	Area treated per month up to October		3						Complied
Herbicides	WHO Class	LD50 (oral) mg/Kg	LD 50 (inhalation) Mg/l	LD50 (dermal) mg/Kg	Active ingredient	Area treated per month up to October											
	3																
7.2.3	<p>(C) Any use of pesticides is minimised as part of a plan, eliminated where possible, in accordance with IPM plans.</p> <p>- Critical (Major) compliance -</p>	<p>Olam Gabon: Agricultural Policy Manual, Volume 2, In Chapter 15: Integrated Pests and Diseases Management Practices, describes actions for the control of different types of pests. In Ndende Elephants, leaf eaters, have been identified as pests. However, no pesticides are used for their elimination.</p> <p>Instead, actions to manage the pests include green ground covers management (turnera subulate) for leaf eaters and physical barriers such as trenches, fences and barbed wire for elephants.</p> <p>OPG organises trainings in pest management. Refresher Training and Field Practices About Pest and Diseases in Ndende, from 8-9 September 2020, Agronomy Team in Ndende. Topics discussed included: early warning systems, immediate control, census after control/evaluation. Signed attendance sheet seen.</p>	Complied														

Criterion / Indicator		Assessment Findings	Compliance
7.2.4	<p>There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in national best practice guidelines.</p> <p>- Minor compliance -</p>	<p>The unit of certification does not practice prophylactic use of pesticides.</p>	Complied
7.2.5	<p>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 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"> a) Judgment of the threat and verify why this is a major threat b) Why there is no other alternative which can be used c) Which process was applied to verify why there is no other less hazardous alternative d) What is the process to limit the negative impacts of the application e) Estimation of the timescale of the application and steps taken to limit application to the specific outbreak. <p>- Minor compliance -</p>	<p>No pesticides categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions are used by the company.</p>	Complied
7.2.6	<p>(C) 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>Pesticides are only handled, used or applied by persons who have completed the necessary training as evidenced. There exists a training plan for all workers for the whole year for both Ndende and Lot 3. Training topics covered during these sessions include: spraying technology and safety procedure and mechanized spraying.</p> <p>OPG organises 3 training sessions per year as evidenced by training reports seen during the audit, such as:</p> <ol style="list-style-type: none"> 1. Target workers: Semi-Mechanical Sprayers 	Complied

Criterion / Indicator	Assessment Findings	Compliance
	<p>Date: 23rd November 2021 Venue: Lot 3 (Fera, Nanga, Estate 18) Topic: Safety, i.e. PPE; water pollution and preservation; semi-mechanical calibration; chemical classes, usages, hazard analysis.</p> <p>2. Target workers: Sprayers Date: 24th June 2021 Venue: Lot 3 (Estate 12, Division 4, BlockM-43) Topic: Safety, i.e. PPE; water pollution and preservation; semi-mechanical calibration; chemical classes, usages, hazard analysis.</p> <p>No female staffs are involved in spraying activities.</p>	
<p>7.2.7 (C) Storage of all pesticides is in accordance with recognised best practices. - Critical (Major) compliance -</p>	<p>OPG has developed a Procedure for Storage and Handling of Agrochemical Products (Document Ref OPG-MLA-EHS-SOP-05 established on 01/10/2013; Version 2 of 01/10/2021).</p> <p>Based on this, OPG keeps a list of all authorised fertilizers in Gabon (Liste de Pesticides autorises par le Comite des pesticides de l'AGASA), and their respective uses e.g.</p> <ol style="list-style-type: none"> 1. Aladin – phosphure d'Aluminium – insectide 2. Momento 20% WP – metsulohuron methyl – herbicide 3. Chlorophacinine bloc NU20 – chlorophacinone – rodenticide 4. Coga 80 WP – Mancozeb – fungicide <p>OPG equally keeps a list of all pesticides that are forbidden in Gabon (Listes des Pesticides Interdits par le Comite de Gestion des</p>	<p>Complied</p>

Criterion / Indicator		Assessment Findings	Compliance
		Pesticidess de l'AGASA). This is part of OPG due diligence to prevent the procurement of any forbidden pesticides	
7.2.8	All pesticide containers are properly disposed of and/or handled responsibly if used for storing or for the same purposes. - Minor compliance -	Olam Palm Gabon Lot 3 has developed a Waste Management Plan, that categorizes waste into household waste, medical waste, and other waste categories. This plan requires that quantities of waste generated such as pesticide containers are documented. However, at the pesticide storage unit in Estate 18, there were no records of empty pesticide containers at the pre-mixing station. Moreover, in Ferrá and in Moutassou, not all empty pesticide containers were properly destroyed to prevent any inappropriate use.	Non-compliance
7.2.9	(C) Aerial spraying of pesticides is prohibited. - Critical (Major) compliance -	Interview with workers and review of documents did not establish the use of aerial spraying in the operations of OPG	Complied
7.2.10	(C) Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated. - Critical (Major) compliance -	Before any personnel is admitted to carry out spraying activities, an aptitude test which constitutes a blood and medical analysis is conducted. Additionally, all personnel admitted to carry out spraying are subjected to bi-annual medical surveillance. Levels of ACHE (Acetylcholinesterase) and other physical parameters are controlled. Records of annual medical surveillance for selected sprayers were seen during the audit. For instance, workers with the following registration numbers and dates of annual surveillance were reviewed: <ul style="list-style-type: none"> • 002519: tested on 19/11/2021 • 007013: tested on 19/11/2021 • 019007: tested on 19/11/2021 	Complied

Criterion / Indicator		Assessment Findings	Compliance
		All had ACHE values within the range. Normal blood levels for ACHE range between 33 - 49.3 IU/g of haemoglobin. If results show levels higher than this, the staff is removed from the activity	
7.2.11	<p>(C) 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>Interviews with both administration and staffs revealed that persons under the age of 18, pregnant and breastfeeding women are not employed to carrying out spraying activities.</p> <p>Additionally, and as indicated in 7.2.10 above, persons that have medical restrictions and/or whose ACHE results are higher than normal are offered alternative equivalent work.</p> <p>For instance, a worker with registration number 020607 tested on 19/11/2021 had an ACHE value of 51.6, which is above normal. In accordance with OPG procedure, a transfer request for a change of work for this staff (Fiche de Changement de Poste) was seen during the audit.</p>	Complied
Criterion 7.3: 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 developed a waste management plan (Plan de Gestion des Dechets, Ref. OPG-MLA-QEHS-PLM-01, of 01/02/2016. The plan establishes the different types of waste, segregation, storage, collection and treatment. It was revised in 2021 into Plan des Gestion des Dechets/Strategie et Procedure, Ref. Waste S1-M1.1-Specific Document on Waste Collection: Strategy and Procedure (draft 3). Based on the plan, different waste types produced in different areas of OPG operations are documented in registers. For instance:</p> <ol style="list-style-type: none"> 1. Cahier de Quantité des Déchets Du Centre de Stockage Ferra/Ndende Sotrader. Waste quantities generated on 11, 13, 16, 19, 22, 24, 30/11 were seen during the audit. 	Complied

Criterion / Indicator		Assessment Findings	Compliance
		<p>2. Bouteilles pesticides vide (empty pesticide containers) on 24/11/2020 -13 bags, 19/11/2020 -30 bags, 22/11/2020 -25 Sacs, 24/11/2020 -13sacs.</p> <p>Workers at the waste collection/storage site are trained in waste segregation. Reports on the training dated 09/09/2021 alongside the list of participants was seen during the audit. Additionally, OPG has signed contracts with third parties for the collection and disposal of different wastes. For instance, a contracts with Horizon Petro Products Sarl (for the collection and treatment of waste oils) and HSE Gabon (for the treatment of biomedical waste) were seen during the time of the audit</p>	
7.3.2	<p>Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.</p> <p>- Minor compliance -</p>	<p>Olam Gabon Lot 3 has developed a Waste Management Plan, that categorizes waste into household waste, medical waste, and other waste categories. However, the procedures don't seem to be well understood by workers and managers.</p> <p>In Ferra, waste is not properly segregated at source. The three colour code system for waste bins is not being followed. We found that at a waste collection sites, 2 red bins with 1 green bin or some other combination not respecting the Green-Blue-Red bin at every waste collection site.</p> <p>Additionally, at Moutassou, whereas there is a waste collection plan that prescribes that waste will be collected from living areas three times a week (Monday, Wednesday and Friday), interviews with waste collection staffs revealed that this programme is not followed. This results in a situation where waste accumulates at the collection sites in the worker housing units.</p>	Non-compliance

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7.3.3	The unit of certification does not use open fire for waste disposal. - Minor compliance -	OPG has developed a fire management plan (document ref. DS-PRP.02 of 28/03/2020), which prohibits the use of fire. Additionally, field visits and interviews with workers did not reveal any use of fire in waste disposal.	Complied
Criterion 7.4: 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 -	<p>Olam Palm Gabon has developed good agricultural policies as described in Agricultural Policy Manuals (Volume 1 and Volume 2), established in April 2013.</p> <p>Chapter 6 (volume 1) specifically addresses methods of conserving soils and water.</p> <p>Additionally, OPG has developed a series of SOPs e.g.:</p> <ul style="list-style-type: none"> • Standard Operating Procedure for Manuring (version 1 of 2016) • Standard Operating Procedures for Oil Palm Replanting (version 1 of 2016) • Standard Operating Procedure for Spraying (version 1 of 2016) • Standard Operating Procedure for Oil Palm Fruit Grading (version 1 of 2016) • Standard Operating Procedure for Harvesting Oil Palm (version 1 of 2016). <p>Training in BMP are integrated into other training e.g.</p> <p>Training in Pruning Standards, held on 15th September 2020, in Lot 3, Ferra Estate 18, Division 2, Block J-65, incorporated</p> <ul style="list-style-type: none"> • Frond disposal as frond stacking and importance for palm trees • Progressive pruning: definition and demonstration 	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		<ul style="list-style-type: none"> • Canopy management and importance in palm trees (photosynthesis) <p>Training for sub-contractors equally organized. E.g. Training on "Harvesting and Pruning"; held at Lot 3, Mbadi, Estate 15, Division 3 Block V-110, held on 20th September 2021.</p>	
7.4.2	<p>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>Soil surveys are conducted every 5 years. Reports were seen during the audit:</p> <p>Report of Soil Types Fertility Assessment in Mouila – Lot 1- Olam Palm Gabon. Prepared by Lot 1 Agronomy Team (November 2020).</p> <p>Leaf sampling is done every year as evidenced by:</p> <p>Agronomy Department (section Mouila): Report of Leaf Sampling Exercise in Mouila, Lot3; Field Observation; Prepared by Mouila Agronomy Team, August 2021.</p> <p>Conducted between 25th February to 22nd April 2021. Conducted in all 6 estates of Mouila Lot 3. 689 Blocks were sampled and 461 samples were collected. Leaf Analysis conducted every year.</p> <p>For Ndende Plantation, Report of Leaf Sampling Exercise in Ndende, Field Observation, Prepared by Ndende Agronomy Team, in October 2021. Conducted from 28th April to 21st May 2021. 263 samples were collected, and were received on 1 July 2021 (reference: P-2021-23-P-2021-25).</p>	Complied
7.4.3	<p>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>Chapter 7 of OPG Agriculture Policy Manual Volume 1 (of April 2013), on: Fertilizing Programme for Nursery, Immature and Mature Plantings, clearly states that the nutrient recycling strategy includes the use of Empty Fruit Bunches (EFB). A calendar for application of fertilizers, including EFB is available.</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance
		No POME application yet because the mill just went operational. However, Estates 14 and 15 (which are nearest to the mill) are already receiving EFB. EFB application was seen during field visits at the time of the audit.	
7.4.4	Records of fertiliser inputs are maintained. - Minor compliance -	Records of fertilizer inputs are kept, per estate. Based on periodic leaf and soil analysis, agronomy department sends recommendations for different fertilizers to plantations for application, for the whole year. The records are maintained and include: year of planting, leaf and soil analysis, recommendations for application, of application, dosage applied per palm, type of fertilizer.	Complied
Criterion 7.5: Practices minimise and control erosion and degradation of soils.			
7.5.1	(C) Practices minimise and control erosion and degradation of soils. - Critical (Major) compliance -	EFB application is practised to check soil erosion. Additionally, cover crop planting (<i>Pueraria javanica</i>), as included in Chapter 6: Soil and Water Conservation is conducted. In Estate 18, Ndende, pueraria has been planted as soil erosion control measure. A total of 2,100 Ha of pueraria has been planted across Divisions 1, 2, and 3. A map showing area planted with pueraria was seen during the audit.	Complied
7.5.2	There is no extensive replanting of oil palm on steep terrain. - Minor compliance -	Chapter 6 of OPG Agriculture Policy Manual, equally recommends terracing for planting on inland areas with slopes greater than 6-20 degrees. Meanwhile planting is not recommended for inland areas with slopes exceeding 20 degrees. Section 3.2 describes Soil Conservation techniques. However, no steep terrain is present within the unit of certification.	Complied
7.5.3	There is no new planting of oil palm on steep terrain.	Same as 7.5.2 above	Complied

Criterion / Indicator		Assessment Findings	Compliance
	- Minor compliance -		
Criterion 7.6: 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	<p>(C) 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.</p> <p>- Critical (Major) compliance -</p>	<p>Soil maps were developed as part of SEIA study, as evidenced in Section 4.1.2 on Pedology.</p> <ul style="list-style-type: none"> • Carte topographique du Lot 3 d'Olam Palm Gabon, PARAM 2014 (pg. 69/430). • Carte des reliefs du Lot 3 d'Olam Palm Gabon, PARAM 2014 (page. 70/430) • Carte preliminaire des sols du Lot 3 d'Olam Palm Gabon, page. 77/430 <p>Soil maps exist as evidenced by:</p> <ul style="list-style-type: none"> • Mouila Lot 3 Soil Map (GIS Drone Department, Olam Lebamba, System: WGS_1984_UTM_Zone_32S, of 07/05/2019. • Soil Map Ndende. GIS Drone Department, Olam Lebamba, System.: WGS_1984_UTM_Zone_32S, of 07/05/2019. <p>Soils of Mouila Lot 3, Mouila Lot 3 Extension (Lot 3 B) and Ndende Estates. Mougabala, Douya Onoye and Dola Departments. Ngounie Province, Republic of Gabon, Africa. October 2018.</p>	Complied
7.6.2	<p>Extensive planting on marginal and fragile soils, is avoided, or, if necessary, done in accordance with the soil management plan for best practices.</p> <p>- Minor compliance -</p>	<p>Review of soil maps and also filed visits did not establish any fragile or marginal soils in OPG operational areas.</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance
7.6.3	Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure. - Minor compliance -	Soil surveys are done with drones, and maps are generated, as evidenced in Stream Flow Direction Map Mouila, Lot 3, with elevation information. Application of laterite is prioritized based on the type of soils identified in the soil surveys (e.g. loamy soils). A road maintenance is included in the annual budget to cover boundary road grading, collection road grading, main road grading.	Complied
Criterion 7.7: No new planting on peat, regardless of depth after 15 November 2018 and all peatlands are managed responsibly.			
7.7.1	(C) There is no new planting on peat regardless of depth after 15 November 2018 in existing and new development areas. - Critical (Major) compliance -	Review of soil maps and field visit did not identify peat soils in the concession area.	Not Applicable
7.7.2	Areas of peat within the managed areas are inventoried, documented and reported (effective from 15 November 2018) to RSPO Secretariat. PROCEDURAL NOTE: 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). - Minor compliance -	Same as 7.7.1 above	Not Applicable
7.7.3	(C) Subsidence of peat is monitored, documented and minimised. - Critical (Major) compliance -	Same as 7.7.1 above	Not Applicable
7.7.4	(C) A documented water and ground cover management programme is in place. - Critical (Major) compliance -	Same as 7.7.1 above	Not Applicable
7.7.5	(C) 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.	Same as 7.7.1 above	Not Applicable

Criterion / Indicator	Assessment Findings	Compliance
<p>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 crops suitable for a higher water table (paludiculture) or rehabilitated with natural vegetation.</p> <p>PROCEDURAL NOTE:</p> <p>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>PROCEDURAL NOTE:</p> <p>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>		

Criterion / Indicator		Assessment Findings	Compliance
7.7.6	<p>(C) 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
7.7.7	<p>(C) All areas of unplanted and set-aside peatlands in the managed area (regardless of depth) are protected as "peatland conservation areas"; 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>	Same as 7.7.1 above	Not Applicable
Criterion 7.8: 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>a) The unit of certification does not restrict access to clean water or contribute to pollution of water used by communities.</p> <p>b) Workers have adequate access to clean water.</p> <p>- Minor compliance -</p>	<p>Olam Palm Gabon has developed a water management plan captioned "Water Management Plan (OPG Mouila Lot 3). Code: PLAN MLA/CRS_WMP/02021, Revision 02, of September 2021".</p> <p>The plan covers actions such as training for water treatment plant operators, monitor water quality levels of the drinking water, establish SOP for the maintenance of WTP, no chemical application near streams, restoration of buffers if needed, annual river water testing (pesticides content), regular testing of POME prior to discharge.</p> <p>Results of water analyses were seen at the time of the audit. For instance:</p> <ul style="list-style-type: none"> • Lot 3 Moutassou, sept. 22/2021 • Lot3 Mbadi: 22/09/2021 	Non-compliance

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Criterion / Indicator		Assessment Findings	Compliance
		<ul style="list-style-type: none"> Ndende Ferra: 22/09/2021 <p>Review of Annex A of the company's Water Management Plan outlines the parameters and frequency for water testing. According to the procedures, the company will conduct microbial analysis every months and physio-chemical analysis on quarterly basis. However review of sample reports on the analysis of water made available to the audit team shows the physio-chemical analysis are not conducted on quarterly basis as stated in the company's water management plan</p>	
7.8.2	<p>(C) 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).</p> <p>- Critical (Major) compliance -</p>	<p>Olam Palm Gabon has developed a water management plan:</p> <ul style="list-style-type: none"> Water Management Plan (OPG Mouila Lot 3). Code: PLAN MLA/CRS_WMP/02021, Revision 02, of September 2021. This plan sets out the activities aimed at monitoring the quality of surface waters including rivers, wetlands and buffer zone, best agricultural practices, etc. Sustainable Water Management Plan, Ndende Sotrader plantation, September 2021. Ref. PLAN Sotrader CRS_WMP/2021, Revision 01. Covers protection of human health, protection of water resources, pollution of water resources (surface and ground water) by pesticides. Actions to be taken are included in the plan. <p>Annex B of the water management plan sets down parameters and frequency for surface water testing at twice a year for physio-chemical parameters, including BOD/COD; ones a year for toxic substances and once a year for pesticides.</p> <p>Annex B1: prescribes the dimensions of buffer zones</p> <p>Annex D: map of water points sampling.</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance
		<p>Reports of monitoring of wetlands and riparian zones are captured using the SMART application</p> <p>Additionally, signboards are erected to show riparian zones.</p> <p>Meanwhile, water sampling is conducted on surface water. 2 samples are taken per year, one in the dry season and one in the rainy season.</p>	
7.8.3	<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>- Minor compliance -</p>	<p>OPG has contracted the services of Cabinet d'Expertise et Conseil Pro-Training & Co SARL to analyse its mill effluent. The report of the analysis was seen during the audit. Samples collected: 30/08/2021 received at the laboratory on 01/09/2021; Ref. No. 654-2021AEOPG/NDENDE SH.</p> <p>The report showed that results including BOD are within the legally established limits.</p>	Complied
7.8.4	<p>Mill water use per tonne of FFB is monitored and recorded.</p> <p>- Minor compliance -</p>	<p>OPG monitors and records mill water use per tonne of FFB as evidenced by <i>Ndende and Dola POM Year 2021</i> Records.</p> <p>The records show quantity of FFB, water consumption, water consumption ratio, etc. To achieve this, OPG records quantities of water used on a daily basis: Daily Process Log sheets, and summarizes on a monthly basis.</p> <p>The report titled: <i>Water Usage Monitoring : Ndende Plantation and Dola POM Year 2021</i>, shows quantity of FFB, water consumption and water consumption ratio for September to November 2021. The records show an average consumption ratio of 0.35/tonne of FFB for this period</p>	Complied
<p>Criterion 7.9: Efficiency of fossil fuel use and the use of renewable energy is optimised</p>			

Criterion / Indicator		Assessment Findings	Compliance
7.9.1	<p>A plan for improving efficiency of the use of fossil fuels and to optimise renewable energy is in place, monitored and reported.</p> <p>- Minor compliance -</p>	<p>A plan for improving efficiency of the use of fossil fuels and to optimize renewable energy is integrated in OPG Continuous Improvement Plan. OPG monitors fossil fuel use by type. Data for 2021 were seen during the audit as evidenced in: Efficiency of Fossil Fuel Use (Dola POM – Lot 3 and Ndende Plantations-2021). This shows data on fiber produced, shell produced, total (fiber and shell), average fiber and shell/CPO, etc. for Dola mill from September to November 2021. Additionally, the report titled: Olam Palm Gabon Fossil Fuel vs. CPO Production (2021) for September to November 2021 lists diesel, kernel and their averages are calculated.</p> <p>OPG records quantities of energy used on a daily basis through Daily Process Reports, and consolidates the daily reports into monthly reports</p>	Complied
<p>Criterion 7.10: Plans to reduce pollution and emissions, including greenhouse gases (GHG), are developed, implemented and monitored and new developments are designed to minimise GHG emissions.</p>			
7.10.1	<p>(C) 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>	<p>Olam has identified all its GHG sources. Sources include: POME, fertilizer application, fuel consumption, grid electricity consumption, N₂O from fertilizer, fuel consumption. Reduction of GHG is presented in the Continuous Improvement plan (e.g. their quotas for use of vehicle fuels: control of vehicle engines to ensure efficiency. There are plans for methane capture, i.e. biogas plant to be established. Additionally, there are use of fiber and cork at the mill for sterilization. No public reporting of GHG emissions had been done at the time of the audit because the mill is only 3 months old (i.e. went operational in September 2021)</p>	Complied
7.10.2	<p>(C) 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</p>	<p>In the development of Mouila Lot 3 and Lot 3 extension and Ndende plantations, OPG started with NPP notification. For Lot 3 and Lot 3</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance
	and implemented (following the RSPO GHG Assessment Procedure for New Development). - Critical (Major) compliance -	extension, planting was done following an approach with lowest GHG emission. Carbon Stock calculations were done as part of the in SEIA study.	
7.10.3	(C) Other significant pollutants are identified and plans to reduce or minimise them implemented and monitored. - Critical (Major) compliance -	As already indicated in 7.8.3 above, OPG GHG calculation captures all significant pollutants. All significant pollutants, including POME and N ₂ O are regularly monitored.	Complied
Criterion 7.11: Fire is not used for preparing land and is prevented in the managed area			
7.11.1	(C) Land for new planting or replanting is not prepared by burning. - Critical (Major) compliance -	According to Volume 1, Chapter 2, Section 2.5 of OPG Agriculture Policy Manual, the use of fire for land preparation is firmly prohibited. No new planting or replanting is ongoing within the concession area. Moreover, interviews with local populations, workers and our own field observations did not reveal any use of fire by OPG.	Complied
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 developed a fire prevention plan (document ref. DS-PRP.01; of 05/05/2017). The plan presents a blueprint for planning actions aimed at managing fire hazards if and when they occur in the plantations. The plan guides workers to prevent fires, and to avoid losses, and threats to life and damage to property resulting from fire when they occur. Fire prevention training is organised for workers, while sensitization campaigns are organised for riparian communities.	Complied
7.11.3	The unit of certification engages with adjacent stakeholders on fire prevention and control measures. - Minor compliance -	OPG engages local communities in its effort to prevent and control fires. This takes the form of fire sensitization campaigns for riparian communities, as evidenced by activities from 4-18 November 2021, covering: Moutassou, Mbadi, Ferra, Mounigou, Canton Dola Nord.	Complied

Criterion / Indicator	Assessment Findings	Compliance	
<p>Criterion 7.12: 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.</p>			
<p>7.12.1</p>	<p>(C) 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.</p> <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>	<p>For Lot 3, Olam Palm Gabon has conducted an independent HCV assessment (HCV Assessment Olam Palm Gabon, 33.354 Ha Concession North of Mouila, Final Version May 2012). The study was conducted by Proforest.</p> <p>For Ndende plantation, the HCV Study was conducted by TEREAs as part of the SEIA. Titled: Plantation de Palmiers a Huile Cooperative a Ndende (programme Graine); Etude d'Impact Environnementale et Sociale ; Tomme 1, Rapport Final, Juin 2016. By TEREAs (B.P. 831 – Batterie IV, Gros Bouquet II, Libreville-Gabon.</p>	<p>Complied</p>
<p>7.12.2</p>	<p>(C) 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>PROCEDURAL NOTE:</p> <p>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>Same as 7.12.1 above</p>	<p>Complied</p>
<p>7.12.3</p>	<p>In High Forest Cover Landscapes (HFCLs) within HFCCs, a specific procedure will apply for legacy cases and development by indigenous</p>	<p>All planted area has been subjected to the RSPO New Planting Procedure with public notification on the RSPO website.</p>	<p>Complied</p>

Criterion / Indicator	Assessment Findings	Compliance
<p>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>PROCEDURAL NOTE: 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&C requirements apply, including FPIC and HCV requirements.</p> <p>- Minor compliance -</p>		
<p>7.12.4 (C) 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>- Critical (Major) compliance -</p>	<p>Based on the HCV assessment, Olam Palm Gabon has developed an HCV management plan (Plan de Gestion des HVC – Olam Palm Gabon, Plantation Sotrader (Ref. No.01/HVC PLAN/08/20, of 08/2020.)). The HCV Management plan identifies threat (hunting/poaching, conflicts with elephants, chemical pollution of water courses, erosion, etc. and proposes control measures. Annex 3 presents an annual calendar of activities in HCVs for Lot 3 and Sotrader.</p> <p>Based on the calendar in the HCV management plan, monthly field visits are undertaken by the Olam HCV unit to monitor the state of the HCVs. Major elements captured include monitoring of elephant trenches, monitoring of fires, etc.</p> <p>Last monitoring report for August/September 2021 seen during the audit, with camera trap images. The reports equally capture results from:</p>	<p>Complied</p>

Criterion / Indicator		Assessment Findings	Compliance
		<ul style="list-style-type: none"> • Joint reports on illegal activities (with forestry department) • Camera traps • Daily reports/weekly on intrusion, traps, No. of km walked, illegal hunting, illegal bush clearing, illegal sawing. <p>These findings are consolidated into the OPG-ORG Sustainable Development Weekly Reporting Matrix.</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>Based on the HCV assessment, Olam Palm Gabon has developed an HCV management plan (Plan de Gestion des HVC – Olam Palm Gabon, Plantation Sotrader (Ref. No.01/HVC PLAN/08/20, of 08/2020.), cited above. Social HCVs including HCV 5 and HCV 6 were identified in the concession area.</p> <p>The HCV management plan shows that different stakeholders including local communities were duly consulted. Consultations with communities as well as government officials during the period of the audit confirmed that they were consulted during the HCV assessment and the development of the HCV management plan. Additionally, communities confirmed that OPG does not prevent them from accessing the social HCVs.</p> <p>OPG monitors HCV, except for those that constitute sacred sites for communities. OPG carries out sensitization activities on HCV and bush meat consumption as evidenced by the report of sensitization in Lot 3 and Ndende, together with attendance sheets (12-25/08/2021).</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>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</p>	<p>OPG carries out joint monitoring missions with the forestry administration as evidenced by Letter from Olam Palm Gabon, dated 07/October 2021, subject: Présence permanente d'un buffle dans notre plantation, to Chef de Cantonnement des Eaux et Forêts de la Dola (Permanent presence of a buffalo in our plantation).</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance
	<p>individual working for the company is found to capture, harm, collect, trade, possess or kill these species.</p> <p>- Minor compliance -</p>	<p>This led to a control mission by Forestry service on 09-17 October including: sensitization, patrol, etc.</p> <p>Additionally, OPG sanctions defaulting workers as evidenced by the sanction of a worker (driver) who transported a buffalo, killed by another worker (a Sotrader security officer), who was equally sanctioned. Sanction letter dated 25/05/2020 was seen during the audit.</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 monitors all HCVs, and RTEs using the SMART application. Daily monitoring activities, including sightings of RTEs and other species. These daily activities are consolidated to produce weekly, monthly and annual reports.</p> <p>These findings are consolidated into the OPG-ORG Sustainable Development Weekly Reporting Matrix. Field findings are considered in planning of further monitoring activities.</p>	Complied
7.12.8	<p>(C) 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>As already mentioned in 7.12.2 above, all new plantings were subjected to HCV assessment and NPP.</p>	Complied

Appendix B: GHG Reporting Executive Summary (N/A)

The GHG emissions that were produced in **2021** for **Dola Palm Oil Mill** and supply base was calculated using the PalmGHG Calculator version 4.0. 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 2022 for **Dola POM** and supply base are as following:

Emission per product	tCO ₂ e/tProduct
CPO	-24.23
PKO	-29.21

Extraction	%
OER	24.03
KER	3.60

Production	t/yr
FFB Process	50,074.37
CPO Produced	12,032.87
PKO Produced	1,802.68

Land Use	Ha
OP Planted Area	25,803.36
OP Planted on peat	0.00
Conservation (forested)	26,905.00
Conservation (non-forested)	42,713.90
Total	95,422.26

Summary of Field Emission and Sink

	Own Crop*		Group		3 rd Party		Total	
	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB
Emission								
Land Conversion	16,824.39	0.34	0.00	0.00	0.00	0.00	16,824.39	0.34
CO ₂ Emission from fertilizer	8,329.52	0.17	0.00	0.00	0.00	0.00	8,329.52	0.17
NO ₂ Emission	4,746.85	0.09	0.00	0.00	0.00	0.00	4,746.85	0.09
Fuel Consumption	5,659.56	0.11	0.00	0.00	0.00	0.00	5,659.56	0.11
Peat Oxidation	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Sink								
Crop Sequestration	-203,583.04	-4.07	0.00	0.00	0.00	0.00	-203,583.04	-4.07
Conservation Sequestration	-173,911.83	-3.47	0.00	0.00	0.00	0.00	-173,911.83	-3.47
Total	-341,934.55	-6.83	0.00	0.00	0.00	0.00	-341,934.55	-6.83

**Note: Includes both estates and smallholders*

Summary of Mill Emission and Credit

	tCO ₂ e	tCO ₂ e/tFFB
Emission		
POME	6,544.70	0.13
Fuel Consumption	113.71	0.00
Grid Electricity Utilization	0.00	0.00
Credit		
Export of Grid Electricity	0.00	0.00
Sales of PKS	0.00	0.00
Sales of EFB	0.00	0.00
Total	6,658.41	0.13

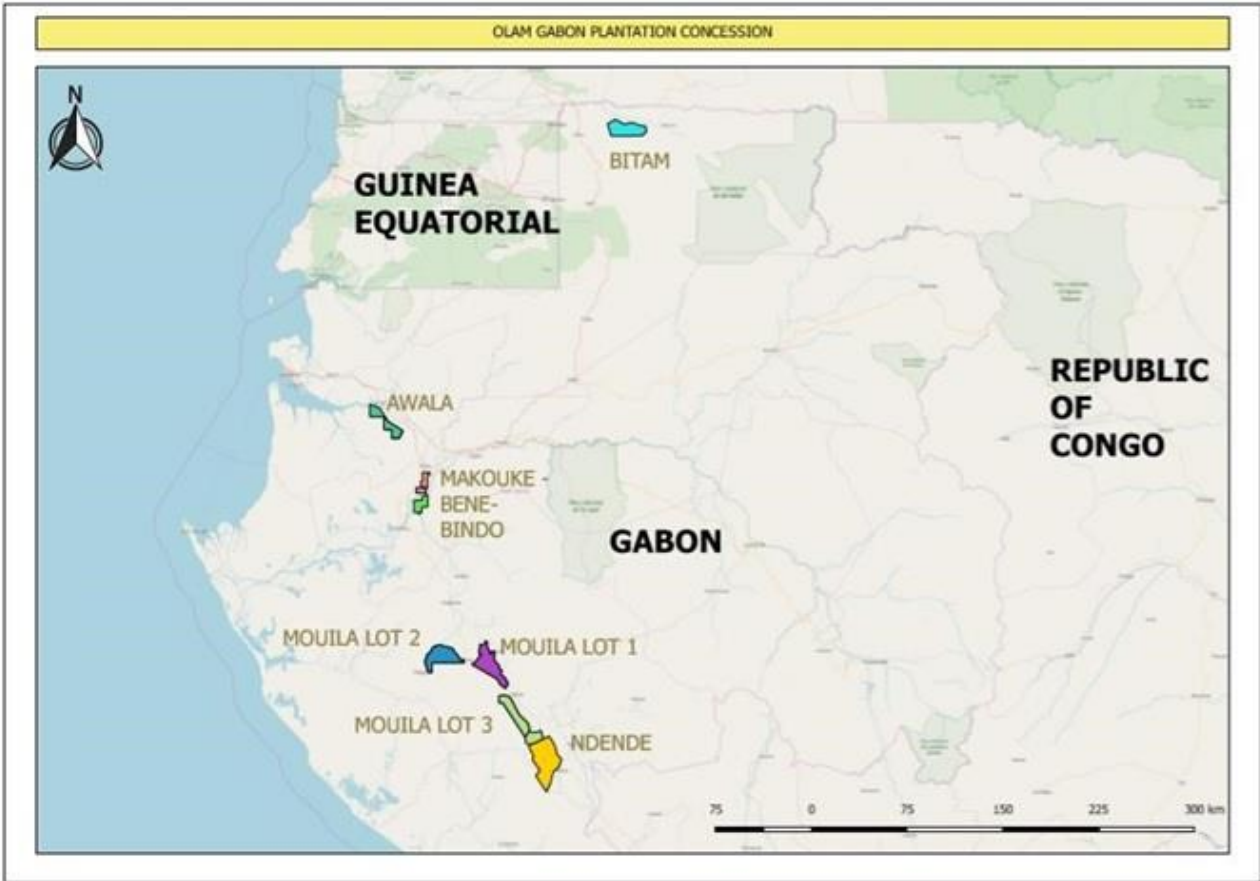
Summary of Kernel Crusher Emission and Credit

Emissions	tCO₂e
PK from own mill	-42,444.98
PK from other source	0.00
Fuel Consumptions	48.73
Total Crusher emissions	-42,396.25

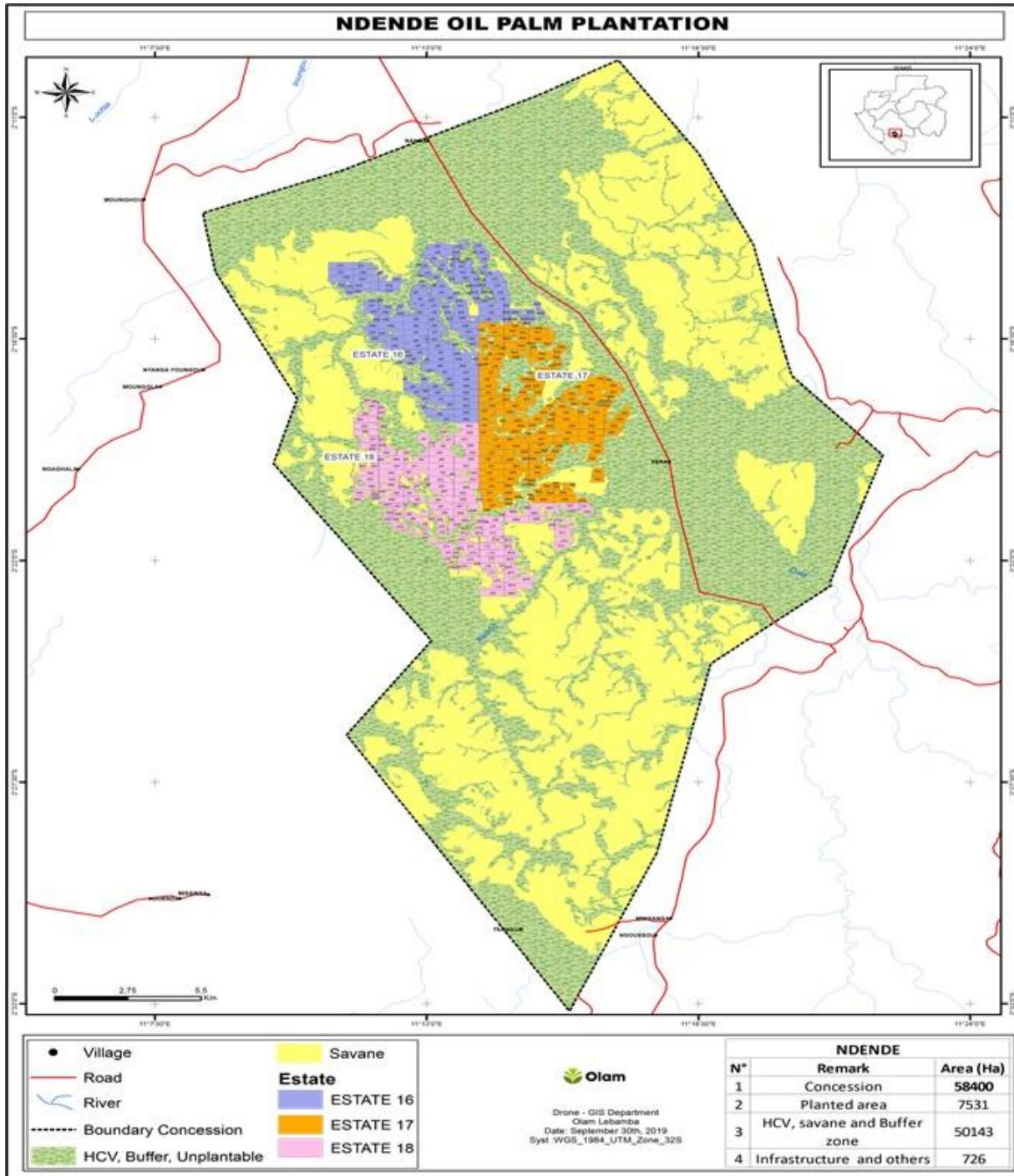
Palm Oil Mill Effluent (POME) Treatment:	
Divert to Compost (%)	0
Divert to anaerobic diversion (%)	100%

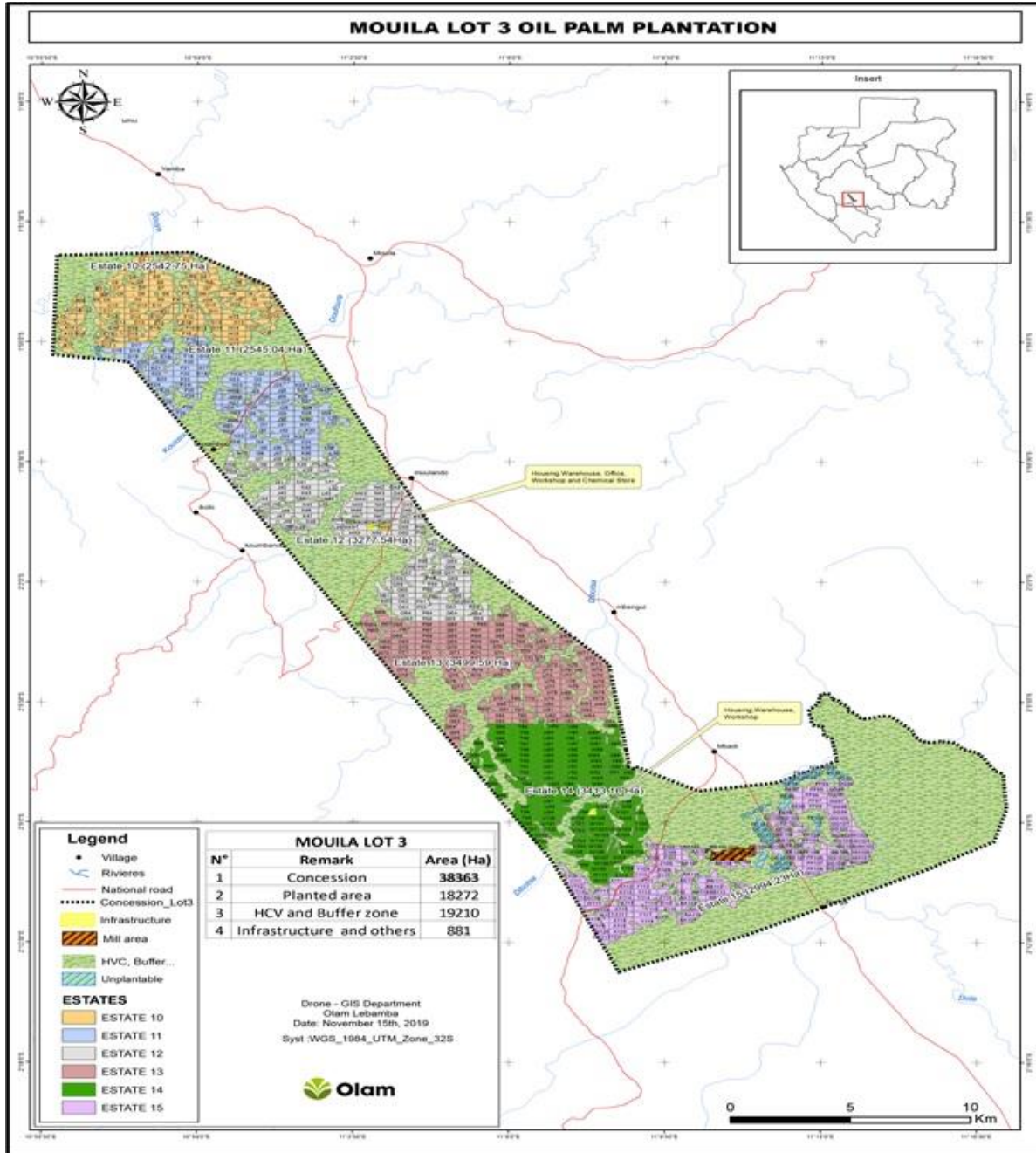
POME Diverted to Anaerobic Digestion:	
Divert to anaerobic pond (%)	100%
Divert to methane captured (flaring) (%)	0
Divert to methane captured (energy generation) (%)	0

Appendix C: Location Map of Certification Unit and Supply bases



Appendix D: Estate Field Map





Appendix F: 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
ISS	Independent Smallholder Standard
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