

**RSPO PRINCIPLE AND CRITERIA –
3RD ANNUAL SURVEILLANCE ASSESSMENT (ASA3)
Public Summary Report**

OLAM INTERNATIONAL LIMITED
Client company Address: 7 Straight View Marina One East Tower #20-01 Singapore 018936
Certification Unit: Olam Palm Gabon – Awala Palm Oil Mill Location of Certification Unit: Galerie Tsika, En Face de city Sport, Mbolo BP: 1024, Libreville Gabon, Africa

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Section 1: Scope of the Certification Assessment

1. Company Details			
RSPO Membership Number	1-0114-12-000-00	Membership Approval Date	10/02/2011
Parent Company Name	Olam International Limited		
Address	7 Straits View, Marina One East Tower #20-01 Singapore 018936		
Subsidiary (Certification Unit Name)	Olam Palm Gabon SA		
Address	B.P 1024 Galerie Tsika (Mbolo) Libreville, Gabon		
Contact Name	Audrey Lee Mei Fong		
Website	http://olamgroup.com/	E-mail	audrey.lee@olamnet.com
Telephone	+603 6411 6771	Facsimile	+603 6411 6772

2. Certification Information			
Certificate Number	RSPO 651890	Date of First Certification	25/08/2016
		Certificate Start Date	25/08/2016
		Certificate Expiry Date	24/08/2021
Scope of Certification	Palm Oil and Palm Kernel Production		
Applicable Standards	RSPO P&C Gabon NI 2016; RSPO Supply Chain Certification Standard 2017 (CPO Mill – Module E Mass Balance)		

3. Other Certifications			
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
RSPO 654791	Production of Palm Kernel and Palm Kernel Expeller (Mass Balance Model)	BSI Services Malaysia Sdn Bhd.	21/07/2021

4. Location(s) of Mill & Supply Bases			
Name (Mill / Supply Base)	Location [Map Reference #]	GPS Coordinates	
		Latitude	Longitude
Awala POM	Kango, Gabon, Central Africa	0° 01' 19.15" S	10° 11' 51.81" E
Bindo Estate	Makouke District, Gabon, Central Africa	0° 26' 57.52" S	10° 24' 32.41" E
Makouke Estate	Makouke District, Gabon, Central Africa	0° 28' 27.51" S	10° 24' 25.91" E
Lobe Estate	Kango, Gabon, Central Africa	0° 02' 21.55" S	10° 12' 16.90" E

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Bokoue Estate	Kango, Gabon, Central Africa	0° 00' 01.89" N	10° 12' 23.31" E
Komo Estate	Kango, Gabon, Central Africa	0° 01' 54.33" N	10° 09' 06.91" E

5. Description of Supply Base

Estate	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted
Bindo Estate*	2,101.34	347	6,360.86	8,809.2	58.57
Makouke Estate	3,832.67	669	5,396.83	9,898.5	38.72
Lobe Estate	2,239	646	202	3,087.00	72.53
Bokoue Estate	2,313	791	199	3,303.00	70.03
Komo Estate	2,270	11,045	325	13,640.00	16.64
Total	12,756.01	13,498	12,483.69	38,737.7	32.93

**Total of 395 ha of planted area sanctioned due to non-submission of NPP at Bindo Estate through acquisition in 2016. 395 ha of OP planted area is uncertified for the first 3 years from the date of certification.*

6. Plantings & Cycle

Estate	Age (Years)					Mature	Immature
	0 - 3	4 - 10	11 - 20	21 - 25	26 - 30		
Bindo Estate	34.64	1,735.36	331.34	0	0	2,066.7	34.64
Makouke Estate	3072.01	372.35	125.04	0	0	760.66	3,072.01
Lobe Estate	79	2160	0	0	0	2,160	79
Bokoue Estate	123	2190	0	0	0	2,190	123
Komo Estate	98	2172	0	0	0	2,172	98
Total (ha)	3,406.65	8,629.71	456.38	0	0	9,349.36	3,406.65

7. Certified Tonnage of FFB (Own Certified Scope)

Estate	Tonnage / year		
	Estimated (August 2018-July 2019)	Actual (July 2018-May 2019)	Forecast (August 2019- July 2020)
Bindo Estate	N/A	N/A	31,778
Makouke Estate	N/A	N/A	7,607
Lobe Estate	69,000	46,947	103,388
Bokoue Estate			

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Komo Estate			
Total	69,000	46,947	142,773

8. Certified Tonnage of FFB (from other certified unit(s)) if applicable *			
Estate	Tonnage / year		
	Estimated (August 2018-July 2019)	Actual (July 2018-May 2019)	Forecast (August 2019- July 2020)
	N/A		N/A
Total			

9. Non-Certified Tonnage of FFB (outside supplier – excluded from certificate) if applicable			
Independent FFB Supplier	Tonnage / year		
	Estimated (August 2018-July 2019)	Actual (July 2018-May 2019)	Forecast (August 2019- July 2020)
Agrofor Crop	100	16.66	100
Other uncertified management units crop (makouke and mouila)	26,623.71	24,224.26	27,000
Total	26,723.71	24,240.92	27,100

10. Certified Tonnage			
Mill Capacity: 45 MT/hr	Estimated (August 2018-July 2019)	Actual (July 2018-May 2019)	Forecast (August 2019- July 2020)
	FFB	FFB	FFB
	69,000.00	46,947	142,773
SCC Model: MB	CPO (OER: 24.07%)	CPO (OER: 23.68%)	CPO (OER: 24.50%)
	16,609.00	11,115.10	34,979.39
	PK (KER: 4.00%)	PK (KER: 4.40%)	PK (KER: 4.50%)
	2,768.00	2,059.13	6,424.79

11. Actual Sold Volume (CPO)					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	RSB		
CPO (MT)	0	0	0	7,658.506	10,658.506

**Total of CPO credit sales under book and claim: 3,000 mt*

12. Actual Sold Volume (PK)					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	RSB		
PK (MT)	1,523.68	0	0	0	1,523.68

13. Actual Group certification Claims			
	Credit	Physical Volume (MT)	
IS-CSPO		N/A	N/A
IS-CSPKO		N/A	N/A
IS-CSPKE		N/A	N/A

Section 2: Assessment Process

Certification Body:

BSI Services Malaysia Sdn Bhd,
(ASI Accreditation Number: ASI-ACC-067)
Unit 3, Level 10, Tower A
The Vertical Business Suites, Bangsar South
No. 8, Jalan Kerinchi
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BSI is a leading global provider of management systems assessment and certification, with more than 80,000 certified locations and clients in over 180 countries. BSI Standards is the UK's National Standards Body. BSI provides independent, third-party certification of management systems. BSI is ASI Accredited (ASI-ACC-067) to conduct RSPO assessment since 31/10/2014 with accredited office located at Kuala Lumpur, Malaysia and an office at Jakarta and Australia which involve in RSPO Certification Program.

2.1 Assessment Methodology, Programme, Site Visits

The on-site 3rd surveillance assessment was conducted from 13-16/05/2019. The audit programme is included as Appendix D. The approach to the audit was to treat the mill and its supply base as an RSPO Certification Unit. Mill was audited together with the sample estates. A range of environmental and social factors were covered. This includes consideration of topography, palm age, proximity to areas with HCVs, declared conservation areas and local communities.

The Major NC close out on-site assessment was conducted on 24-30/06/2019 and major NC close out verification visit was done on 7-8/8/19. The audit programmes 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 RSPO Principles and Criteria National Interpretation endorsed by the RSPO Board of Governors meeting on 6th March 2017 and RSPO Supply Chain Certification Standard 2017 were used to guide the collection of information to assess compliance. The comments made by external stakeholders were also taken into account in the assessment.

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

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

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the formula $(0.8\sqrt{y}) \times (z)$; where y is total number of independent group member and where z is the multiplier defined by the risk assessment. The sampled smallholder listed in Appendix I.

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

Structured worker interviews with male and female workers and staff were held in private at the workplace in the mill and the estates. Fieldworkers were interviewed informally in small groups in the field. In addition, the wives of workers and staff were interviewed in informal group meetings at their housing. Separate visits were made to each of the local communities to meet with the village head and residents. Company officials were not present at any of the internal or external stakeholder interviews. A list of Stakeholders contacted is included as Section 3.5.

The assessment findings for the initial assessment/annual surveillance assessment are detailed in Section 3.4.

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

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

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

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

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

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)
Awala Palm Oil Mill	√	√	√	√	√
Bindo Estate				√	√
Makouke Estate				√	√
Lobe Estate	√	-	√	√	√
Bokoue Estate	√	√	√	√	√
Komo Estate	-	√	√	√	-

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Tentative Date of Next Visit: June 29, 2020 - July 3, 2020

Total No. of Mandays: 15 mandays

2.2 BSI Assessment Team:

Team Member Name	Role <i>(Team Leader or Team member)</i>	Qualifications <i>(Short description of the team members)</i>
Mohamed Hidhir Zainal Abidin	Team Leader	He holds Bachelor Degree in Chemical Engineering, graduated from National University of Malaysia on 2006. He has 7 years working experience in palm oil industry specifically on palm oil milling for 5 years. He also has the experiences as auditor for several standards including ISO 9001, ISO 140001, OHSAS 18001, MSPO and RSPO in his previous work with another certification body. He completed the ISO 9001 Lead Auditor Course, ISO 14001 Lead Auditor Course and OHSAS 18001 Lead Auditor Course in 2012, Endorsed RSPO P&C Lead Auditor Course in 2013, MSPO Awareness Training in 2014 and Endorsed RSPO SCCS Lead Auditor Course in 2015. He had been involved in RSPO auditing since May 2012 in various plantation companies in Malaysia. During this assessment, he assessed on the aspects of legal, mill best practices, safety and health, environmental and workers and stakeholders consultation.
Nicholas Cheong	Team member	Holds a Master of Environmental Management from the University Putra Malaysia and Bachelor of Science (Food Science) from Charles Sturt University Australia. He has more than 7 years of working experience in sustainability auditing for palm oil industry and hydropower plant. He is also an expert in Greenhouse Gas emissions accounting. He has also 2 years of working experience in wastewater treatment and operations. He has completed the ISO9001, ISO14001, RSPO P&C Lead Auditor course, RSPO Supply Chain Lead Auditor Course, RBA Labor & Ethic Lead Auditor Course and MSPO Awareness Training. In his previous certification body, he was a Lead Assessor for Clean Development Mechanism, World Commission of Dam and ISCC. He had been involved in Sustainable Palm Oil auditing for more than 5 years. In this assessment, the focus element includes legal requirements, social and workers welfare, workers health and safety and supply chain. He is fluent in both verbal/written in English.
Valence Shem	Team member	He holds Bachelor Degree in Industrial Technology, graduated from University of Science Malaysia in 1998 and has 9 years working experience in oil palm plantation industry. He has been in the management system auditing line since 2009 for various standards such as ISO 140001, RSPO P&C, RSPO SCCS and SMETA. He completed the ISO 14001 Lead Auditor Course in 2008, ISO 9001 Lead Auditor Course in 2013, Endorsed RSPO P&C Lead Auditor Course in 2011, Endorsed RSPO SCCS Lead Assessor

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		Course in 2012 and MSPO Awareness Training in 2014. He had been involved in RSPO auditing since 2009 in various companies in Malaysia. During this assessment, he assessed on the aspects of legal, environmental & biodiversity, agriculture best practices and the supply chain element. Able to communicate in Bahasa Malaysia and English.
Kouadioa Charles	Translator	He working as a translator for an agency providing a translation and interpretation service to clients where needed. His main function during the assessment (conversation and documentation) was for the translation of French to English and vice-versa.
Nancy Larissa	Translator	He working as a translator for an agency providing a translation and interpretation service to clients where needed. His main function during the assessment (conversation and documentation) was for the translation of French to English and vice-versa.

Accompanying Persons:

No.	Name	Role
1	N/A	

2.3 Assessment Plan

The Assessment plan was sent to the client prior to the assessment (attached assessment plan).

Date	Time	Subjects	MH	VS	NC	CK	LNM
Saturday 22/06/2019	2250	Depart from KUL to LBV via CDG and AMS	√	√	√	√	-
Sunday 23/06/2019	0945	Depart from Cote D'ivoire to Libreville ETA 1615. Check in at Le Meridian, Libreville	-	-	-	√	-
Sunday 23/06/2019	1945	Arrival at LBV ETA 1215. Check in at Le Meridian, Libreville	√	√	√	√	-
Monday 24/06/2019	0800	Depart from Le Meridian, LBV to site Awala	√	√	√	√	√
Monday 24/06/2019	1200-1300	Arrived at Awala guesthouse. Lunch break.	√	√	√	√	√
Monday 24/06/2019	13.00-14.00	<p>Opening Meeting at Awala</p> <p>Safety briefing and presentation by Awala Team (if any)</p> <ul style="list-style-type: none"> • Presentation by BSI Lead Auditor -introduction of team member and assessment agenda • Confirmation of assessment scope and finalized stakeholders list for interview 	√	√	√	√	√
Awala POM							

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Date	Time	Subjects	MH	VS	NC	CK	LNM
	14:00 – 15:30	Awala POM <ul style="list-style-type: none"> • Mill Visit covering FFB receiving, milling process, warehouse, workshop, wastes management (including Landfill is applicable), Effluent Ponds, OSH & ERP, environmental management, POME application, water treatment, chemical storage and laboratory. • Workers interview covering social elements 	√	√	√	√	√
	1530-1730	Awala POM – Documentation review covering entire certification unit: P1 – Commitment to Transparency P1 – Company Policies and ethical business P2 – Compliance with Applicable Laws and Regulations / Land use rights P6: <ul style="list-style-type: none"> • Workers list and sampling • Social impact assessment / management plan • Communication and Grievance procedures • Freedom of association / equality • Smallholders payment and FFBS pricing • Local sustainability 	√				
		P4: <ul style="list-style-type: none"> • Occupational health and safety plan • Worker trainings • Risk assessment and medical records • Chemical utilization risk • Medical surveillance records • PPE issuance and monitoring P5: <ul style="list-style-type: none"> • Environmental Impact assessment / Environmental Management plant for whole certification unit • Water management and consumptions 	√	√	√	√	
		P3 – Commitment to Long-Term Economic and Financial Viability P4 – Operation procedures P5: <ul style="list-style-type: none"> • Waste management / fossil fuel consumptions / GHG and pollutant management / POME 	-	√	-	-	√
	17:30 – 18:00	Interim closing	√	√	√	√	√
Tuesday 25/06/2019	0700-0830	Travel to Makouke Consession (overnight at Makouke guesthouse)	√	√	√	√	√

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Date	Time	Subjects	MH	VS	NC	CK	LNM
Bindo Estate	09:00 – 10:30	<p>Bindo Estate</p> <p>Field visit covering boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH&ERP, SEIA requirement.</p> <p>Line site/quarters and facilities inspection (dispensary etc)</p>	√	√			√
	10:30 – 12:30	<p>Interview with stakeholders</p> <p>Village rep Community/stakeholder/ affected parties</p>	-	-	√	√	-
	12:30 – 13:30	Lunch break	√	√	√	√	√
	13:30 – 16:30	<p>Bindo Estate - Documentation review continue</p> <p>Time bound plan/partial certification and general information</p> <p>P1 – Commitment to Transparency</p> <p>P1 – Company Policies and ethical business</p> <p>P2 – Compliance with Applicable Laws and Regulations / Land use rights</p> <p>P3 – Commitment to Long-Term Economic and Financial Viability</p> <p>P4:</p> <ul style="list-style-type: none"> • Health and safety plan • Risk Assessment and mitigation • Emergency preparedness and response • Workers insurance / Lost time accident records / clinical records <p>P5:</p> <ul style="list-style-type: none"> • Environmental Aspect and impact • HCV / RTE and management plan • No use of fire • Environmental management plan • Pollution prevention plan 	√		-	-	√
		<p>P4:</p> <ul style="list-style-type: none"> • Operational procedures and implementation • Soil analysis (mapping) and fertility • Road maintenance and peat soil • IPM and Pesticide usage plan • Planting and land statement • Water management plan • Medical check/health condition 	-	√	-	√	√

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Date	Time	Subjects	MH	VS	NC	CK	LSM
		P6: <ul style="list-style-type: none"> • Land use (customary) and land use rights. • Housing planning vs growth • Accessing to food • Work place harassment and equality 	-	-	√	√	-
		P7 Development of new planting (if applicable)	√	√	√	√	√
	16:00 – 16:30	Interim closing	√	√	√	√	√
	1700	Ferry crossing to Makouke Estate					
Wednesday 26/06/2019	08:30 – 12:30	Makouke Estate Field visit covering boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH&ERP, SEIA requirement.	√	√	√	-	√
	1030:12 :30	Interview with stakeholders Village rep Community/stakeholder/ affected parties	-	-	√	√	-
	12:30 – 13:30	Lunch break	√	√	√	√	
	13:30 – 16:30	Makouke Estate - Documentation review continue P1 – Commitment to Transparency P1 – Company Policies and ethical business P2 – Compliance with Applicable Laws and Regulations / Land use rights P3 – Commitment to Long-Term Economic and Financial Viability P4: <ul style="list-style-type: none"> • Health and safety plan • Risk Assessment and mitigation • Emergency preparedness and response • Workers insurance / Lost time accident records / clinical records P5: <ul style="list-style-type: none"> • Environmental Aspect and impact • HCV / RTE and management plan • No use of fire • Environmental management plan Pollution prevention plan	√	√		-	√

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		P4: <ul style="list-style-type: none"> • Soil analysis (mapping) and fertility • Road maintenance and peat soil • IPM and Pesticide usage plan • Planting and land statement • Water management plan • Medical check/health condition 	-	√	-	-	√
		P6: <ul style="list-style-type: none"> • Land use (customary) and land use rights. • Housing planning vs growth • Accessing to food • Work place harassment and equality 	-	-	√	-	√
		P7 Development of new planting (if applicable)	√	√	√	√	√
	16:30-17:00	Interim closing	√	√	√	√	√
	PM	Overnight at Makouke guest house	√	√	√	√	√
Thursday 27/06/2019	0730	Ferry crossing – travel to Awala	√	√	√	√	√
Lobe Estate	08:30 – 12:30	Lobe Estate Field visit covering boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH&ERP, SEIA requirement. Line site/quarters and facilities inspection. including clinic/hospital/dispensary	√	√	-	-	√
	1030-1230	Interview with stakeholders Village rep Community/stakeholder/ affected parties	-	-	√	√	-
	12:30 – 13:30	Lunch break	√	√	√	√	√
	13:30-16:30	Lobe Estate - Documentation review continue P1 – Commitment to Transparency P1 – Company Policies and ethical business P2 – Compliance with Applicable Laws and Regulations / Land use rights P3 – Commitment to Long-Term Economic and Financial Viability P4: <ul style="list-style-type: none"> • Health and safety plan • Risk Assessment and mitigation • Emergency preparedness and response 	√				√

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Date	Time	Subjects	MH	VS	NC	CK	LNM
		<ul style="list-style-type: none"> Workers insurance / Lost time accident records / clinical records P5: <ul style="list-style-type: none"> Environmental Aspect and impact HCV / RTE and management plan No use of fire Environmental management plan Pollution prevention plan		√			
		P4: <ul style="list-style-type: none"> Soil analysis (mapping) and fertility Road maintenance and peat soil IPM and Pesticide usage plan Planting and land statement Water management plan Medical check/health condition	-	√	-	-	√
		P6: <ul style="list-style-type: none"> Land use (customary) and land use rights. Housing planning vs growth Accessing to food Work place harassment and equality	-	-	√	√	-
		P7 Development of new planting (if applicable)	√	√	√	√	√
	16:30-17.00	Interim closing	√	√	√	√	√
Friday 27/6/2019	08:30 – 12:30	Bokoue Estate Field visit covering boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH&ERP, SEIA requirement. Line site/quarters and facilities inspection. including clinic/hospital/dispensary	√	√	-	-	√
Bokoue Estate	1030-1230	Interview with stakeholders Village rep Community/stakeholder/ affected parties	-	-	√	√	-
	12:30 – 13:30	Lunch break	√	√	√	√	√
	13:30-16:30	Bokoue Estate - Documentation review continue P1 – Commitment to Transparency P1 – Company Policies and ethical business P2 – Compliance with Applicable Laws and Regulations / Land use rights P3 – Commitment to Long-Term Economic and Financial Viability	√				√

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Date	Time	Subjects	MH	VS	NC	CK	LNМ
		P4: <ul style="list-style-type: none"> • Health and safety plan • Risk Assessment and mitigation • Emergency preparedness and response • Workers insurance / Lost time accident records / clinical records P5: <ul style="list-style-type: none"> • Environmental Aspect and impact • HCV / RTE and management plan • No use of fire • Environmental management plan Pollution prevention plan	√				
		P4: <ul style="list-style-type: none"> • Soil analysis (mapping) and fertility • Road maintenance and peat soil • IPM and Pesticide usage plan • Planting and land statement • Water management plan Medical check/health condition	-	√	-	-	√
		P6: <ul style="list-style-type: none"> • Land use (customary) and land use rights. • Housing planning vs growth • Accessing to food Work place harassment and equality	-	-	√	√	-
		P7 Development of new planting (if applicable)	√	√	√	√	√
	16:30-17.00	Interim closing	√	√	√	√	√
Saturday 28/6/2019	08:30 – 12:30	Komo Estate Field visit covering boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH&ERP, SEIA requirement. Line site/quarters and facilities inspection. including clinic/hospital/dispensary	√	√	-	-	√
	1030-1230	Interview with stakeholders Village rep Community/stakeholder/ affected parties	-	-	√	√	-
	12:30 – 13:30	Lunch break	√	√	√	√	√
	13:30-16:30	Komo Estate - Documentation review continue P1 – Commitment to Transparency	√				√

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Date	Time	Subjects	MH	VS	NC	CK	LNM
		P1 – Company Policies and ethical business P2 – Compliance with Applicable Laws and Regulations / Land use rights P3 – Commitment to Long-Term Economic and Financial Viability P4: <ul style="list-style-type: none"> • Health and safety plan • Risk Assessment and mitigation • Emergency preparedness and response • Workers insurance / Lost time accident records / clinical records P5: <ul style="list-style-type: none"> • Environmental Aspect and impact • HCV / RTE and management plan • No use of fire • Environmental management plan Pollution prevention plan	√				
		P4: <ul style="list-style-type: none"> • Soil analysis (mapping) and fertility • Road maintenance and peat soil • IPM and Pesticide usage plan • Planting and land statement • Water management plan Medical check/health condition	-	√	-	-	√
		P6: <ul style="list-style-type: none"> • Land use (customary) and land use rights. • Housing planning vs growth • Accessing to food Work place harassment and equality	-	-	√	√	-
		P7 Development of new planting (if applicable)	√	√	√	√	√
	16:30-17.00	Interim closing	√	√	√	√	√
Sunday 30/6/2019	08:30-12:30	RSPO SCCS audit - General chain of custody - Rules of communication and claims	-	-	√	√	√
Awala POM	08:30-12:30	Supply chain modular requirements – module E: Mass balance	√	-	-	√	√
	12.30-13.30	Lunch break	√	√	√	√	√

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	13.30 – 15.00	Continue with unfinished elements (Awala POM)	√	√	√	√	√
	15:00-16:00	Audit team discussion – Closing meeting and presentation of finding	√	√	√	√	√
	16:00-19:00	End of audit – travel to LBV. Dinner and check in at LBV airport	√	√	√	√	√
	2020	Travelling back via AF977	√	√	√	√	-
Monday 1/7/19	AM	Travelling back to Cote D'ivoire via KP041, ETD 1015	-	-	-	√	-

Major NC close out verification plan

PRELIMINARY AGENDA				
Date	Time	Subjects	Mohd Hidhir	Nancy
Monday 5/8/2019	PM	Depart from KUL to LBV via SIN and CDG	√	-
Tuesday 6/8/2019	PM	Arrival at LBV ETA 1945. Check in at Le Meridian, Libreville	√	-
Tuesday 7/8/2019	0800 AM	Travelling to Makouke Concession	√	√
	12.00-13.00	Lunch break		
	13.00	Opening Meeting: <ul style="list-style-type: none"> Opening Presentation by Audit team leader. Briefing on site verification plan 		
	13.00 – 16.00	Bindo Estate – Verification on previous Major NC. Site observation, workers interview (individual and group session) if necessary Document review – implemented evidence	√	√
	16.00	Travelling back and overnight at Awala Plantation	√	√
Wednesday 8/8/2019	8.00 – 11.00	Awala Plantation – Verification on previous Major NC. Site observation, workers interview (individual and group session) if necessary Document review – implemented evidence	√	√

PRELIMINARY AGENDA				
Date	Time	Subjects	Mohd Hidhir	Nancy
	11.00 – 12.00	Closing meeting - conclusion and recommendation End of verification visit	√	√
	13.00-14.00	Lunch break		
	15.00	Travel back to LBV	√	√
	2220	Travel back to KUL via AF 977 ETA 2220	√	-

Section 3: Assessment Findings

3.1 Normative requirement applied for this assessment:

- Olam Palm Gabon Multiple Management Units / Time Bound Plan
- RSPO P&C 2013 Generic
- RSPO Group Certification Standard 2016
- RSPO Supply Chain Certification Standard 2017
- RSPO P&C GA-NIWG 2017
- RSPO P&C INA-NIWG 2016
- RSPO P&C MY-NIWG 2014
- RSPO P&C PNG-NIWG 2017
- RSPO P&C Gabon-NIWG 2017

3.2 Time Bound Plan progress for multiple management units

Time Bound Plan		
Requirement	Remarks	Compliance
Does the plan include all current subsidiaries, estates and mills?	<p>The time bound plan includes all operating units in Gabon, Africa.</p> <p>The certification plan was revised and approved in May 2019 to update recent certification of Lot 3, and update on membership date due to group membership rule.</p> <p>To date, certification was achieved according to the time bound plan.</p> <p>The smallholders' agricultural program, GRAINE (Gabon des Réalisations Agricoles et des Initiatives des Nationaux Engagés) target for certification is updated to year 2020 due to immature field.</p>	Yes

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<p>Have all the estates and mills certified within five years after obtaining RSPO membership?</p>	<p>Olam International joined RSPO in 2011, recently membership date is updated to 2006 due to group membership rule, following the earliest membership date of one subsidiaries under our group. Olam managed 5 plantations, 4 are new plantings developed in 2011 (Awala), 2012 (Mouila Lot 1), 2013 (Mouila Lot 2), 2015 (Mouila Lot 3), 2017 (Mouila Lot 3 extension) and one is newly acquired from SIAT in July 2016, hence certification is planned according to completion of the planting and establishment of relevant infrastructure. For acquired asset, RSPO system states a provision to certify acquired property within 3 years.</p>	<p>Yes</p>
<p>Have there been any new acquisitions? If yes, the new acquisitions shall be certified within three-year from the date of acquisition. Certification plan for the new acquisition shall be available.</p>	<p>Makouke plantation was acquired from SIAT in July 2016 and certified is planned within 3 years.</p>	<p>Yes</p>
<p>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?</p>	<p>The certification plan was revised and approved in May 2019 to update recent certification of Lot 3, and update on membership date due to group membership rule. The smallholders' agricultural program, GRAINE (Gabon des Réalisations Agricoles et des Initiatives des Nationaux Engages) Ndende target for certification is updated to year 2020 due to immature field.</p>	<p>Yes</p>
<p>Have there been any isolated lapses in implementation of the plan? If yes a Minor non-compliance shall be raised</p>	<p>Mouila Lot 3 certification is brought forward and achieve one year ahead of the TBP. The smallholders' agricultural program, GRAINE (Gabon des Réalisations Agricoles et des Initiatives des Nationaux Engages) Ndende target for certification is updated to year 2020 due to immature field.</p>	<p>Yes</p>
<p>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</p>	<p>No.</p>	<p>Yes</p>
<p>Have there been any stakeholder comments?</p>	<p>No comments received since last audit period.</p>	<p>Yes</p>
<p>Un-Certified Units or Holdings</p>		
<p>No replacement after dates defined in NIs Criterion 7.3:</p> <ul style="list-style-type: none"> • Primary forest. • Any area required to maintain or enhance 	<p>HCV assessment have been conducted by Proforest prior to all OPG's palm development and according to the NPP 2010. Public summary report is available on the Olam's website.</p>	<p>Yes</p>

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HCVs in accordance with RSPO P&C criterion 7.3.		
Any new plantings since January 1 st 2010 shall comply with the RSPO New Plantings Procedure.	Uncertified areas Mouila Lot 2 has completed NPP and approved after the RSPO 30-days public consultation. Part of undeveloped area under Makouke plantation is subject to NPP and OPG has planned for NPP process, pending on notification.	Yes
Any Land conflicts are being resolved through a mutually agreed process, such as RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO P&C criteria 2.2, 6.4, 7.5 and 7.6. The RSPO RaCP tracker shall be checked to confirm for any land conflicts/Liabilities https://www.rspo.org/certification/remediation-and-compensation/racp-tracker . The progress on the Liabilities shall be verified and reported.	Mouila Lot 2 in March 2017, 242 ha of community set aside (HCV6) identified through FPIC process claimed by Bemboudie Village is mistakenly classified as development area under Boungounga Village who share some families and territories with Bemboudie. Mutual agreement and resolutions was reached through direct engagement and third party facilitation. Grievance is closed. See public grievance log . Meeting record, agreement and official reply from the Bemboudie village are available.	Yes
Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 6.3.	A strikes was called by self-elected workers' representative from Mouila in October 2018 and key issues raised including: 1. Non-renewal of temporary contract workers. 2. Employment of foreign workers 3. Additional demands on top of the Collective Agreements made in Feb 2017. Discussion with workers' representative from Mouila was conducted on 28 Nov 2018. All additional demands were discussed, and minutes were recorded and signed for, and communicated with all workers through their representatives and with the Labour Department. OPG hold monthly meeting with the worker representatives as well as representative(s) from the Labour Department to update on the status and progress of the agreed action items. Grievance is closed for monitoring.	Yes
Any Legal non- compliance is being addressed through measures consistent with the requirements of RSPO P&C criteria 2.1	No legal non-compliance. A separate external legal audit is conducted for all sites annually.	Yes
Did the company conduct internal audit against the uncertified management units requirement? If yes, a positive assurance statement shall be available.	Yes, annual internal audit is conducted for all management units including uncertified units.	Yes

3.3 Progress of scheme smallholders and/or outgrowers (if applicable to this assessment)

Progress of scheme smallholders or outgrowers towards compliance with relevant standards		
Requirement	Remarks	Compliance
<p>Has 100% of scheme smallholders and/or scheme outgrowers comply with the standard within three years of the mill's initial certification?</p> <p>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.</p>	N/A	N/A

3.4 Details of findings

The nonconformity is listed below. The summary report of the assessment by criteria is listed in Appendix A.

During the Surveillance Assessment there were 5 (five) Major Nonconformities & 5 (five) Minor Nonconformity raised. The Awala 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 Major Nonconformity(ies) has been verified for it effectiveness and closed accordingly.

Summary of Total Number of Nonconformity			
Nonconformity			
NCR Ref #	1791736-201903-M1	Clause & Category (Major / Minor)	Indicator 4.6.11 Major
Date Issued	30/06/2019	Due Date	28/09/2019
Closed (Yes / No)	Yes	Date of nonconformity Closure	11/08/2019
Statement of Nonconformity:	Medical surveillance for pesticides operator was not effectively demonstrated		
Requirement Reference:	Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, shall be demonstrated.		
Objective Evidence:	<p>Makouke Estate One (1) sprayer, employee no. 062212 was not included in the latest medical surveillance programme in March 2019.</p> <p>Lobe Estate Three (3) sprayers under contractor "SEPROGRA" were not included in January and April medical surveillance programme.</p>		
Corrections:	i) Conduct the medical check for all sprayers who did not attend the medical check		

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<p>Root Cause Analysis:</p>	<ul style="list-style-type: none"> i) Lack of coordination between operation and doctor regarding medical check for sprayers. Some workers are shifted from an activity to another without communication between teams ii) High turnover of sprayers iii) The medical check is conducting usually after work time, workers already tired and hurry to get the trucks back home. iv) Others refuse to conduct the medical check because they did not receive their previous results.
<p>Corrective Actions:</p>	<ul style="list-style-type: none"> i) Check all the sprayers and conduct the pre-work and annual medical check ii) Conduct medical check during selected work day during working hour. iii) Update the sprayers list every month iv) Include the medical check's status into the EHS weekly report v) No new contractor's sprayer accepted without approval from management and complete pre-work medical test before work starts
<p>Assessment Conclusion:</p>	<p>Major NC close out verification: The following evidences were sighted during on site verification;</p> <ul style="list-style-type: none"> i) Medical surveillance report, for employee no. 062212 on July 2018. Based on medical report dated 1/8/19, the workers was found to be fit to work. Interview with the said worker has confirmed the medical check was conducted and he was been informed on his health status. Refer to lab results for Butyl cholinesterase result dated 1/8/19. ii) Updated sprayer list for Awala and Makouke Plantation was verified. Refer to EHS weekly report. Both OLAM and contractor's workers updated in the list. As of August 2019, there was no new sprayers from OLAM. For existing workers contractor's workers without CNSS registration, termination will be initiated. Refer to termination letter dated 9/8/19 from SEPROGA. Based on the above verification, it was confirmed that corrective action has been implemented effectively with sufficient evidence of implementation. <p>Thus, the major NC is closed on 11/8/19. Continuous implementation will be further verified in the next assessment</p>

<p>Summary of Total Number of Nonconformity</p>			
<p>Nonconformity</p>			
<p>NCR Ref #</p>	<p>1791736-201903-M2</p>	<p>Clause & Category (Major / Minor)</p>	<p>Indicator 2.2.1 Major</p>
<p>Date Issued</p>	<p>30/06/2019</p>	<p>Due Date</p>	<p>28/09/2019</p>
<p>Closed (Yes / No)</p>	<p>Yes</p>	<p>Date of nonconformity Closure</p>	<p>11/08/2019</p>
<p>Statement of Nonconformity:</p>	<p>Documents showing legal ownership for overplanted area was not made available.</p>		
<p>Requirement Reference:</p>	<p>Documents showing legal ownership or lease, history of land tenure and the actual legal use of the land shall be available.</p>		
<p>Objective Evidence:</p>	<p>Bindo Estate 2.97 ha of oil palm planted outside concession area at block E 43 and F42 at verified on site at GPS coordinate location 0° 24' 30.456" N, 10° 23' 21.191" E.</p>		

Corrections:	<ul style="list-style-type: none"> i) All the palm outside legal limit will be removed ii) A notification letter to be send to government
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Root Cause Analysis:	<ul style="list-style-type: none"> i) Olam acquired Makouké plantation from SIAT in July 2016 and those areas was already replanted by SIAT in 2014. ii) After acquisition Olam did not check whether all planted areas by SIAT are inside legal limit.
Corrective Actions:	<ul style="list-style-type: none"> i) Check all the blocks of the 2 estates (Makouke & Bindo) in terms of legal limit ii) Maintain boundary markers as per SOP
Assessment Conclusion:	<p>Major NC close out verification: The following evidences were sighted during on site verification;</p> <ul style="list-style-type: none"> i) An official letter was sent to the Sub Prefect of Makouke District pertaining to the overplanted issue on government land. Acknowledgement of receipt was sighted dated 22/7/19. ii) Verification report by GIS team from July to August 2019 was sighted. Focus area at Makouke and Bindo Estate was re-survey to check planted area vs legal limit (concession area). No over planted area found and all planted oil palm are within concession area. iii) Observed during site visit, legal limit of concession area has been clearly demarcated. A clear and visible signage was erected at site with boundary marker. iv) Area statement date 7 August 2019 has shown the overplanted area excluded (2.97 ha) from total planted area. v) Newly revised estate map, dated 6th August 2019 by GIS Department was verified based on result of latest verification to confirm the concession limit at Makouke Plantation. Based on the above verification, it was confirmed that corrective action has been implemented effectively with sufficient evidence of implementation. <p>Thus, the major NC is closed on 11/8/19. Continuous implementation will be further verified in the next assessment.</p>

Summary of Total Number of Nonconformity			
Nonconformity			
NCR Ref #	1791736-201903-M3	Clause & Category (Major / Minor)	Indicator 6.3.2 Major
Date Issued	30/06/2019	Due Date	28/09/2019
Closed (Yes / No)	Yes	Date of nonconformity Closure	11/08/2019
Statement of Nonconformity:	The documentation and resolution process are not available.		
Requirement Reference:	Documentation of both the process by which a dispute was resolved and the outcome shall be available.		

Objective Evidence:	<ol style="list-style-type: none"> 1. At Awala site, records of the internal grievances before 2019 are not available. The reason of the records were not available was due to the previous HR manager has left without proper hand over. There is a failure in the system where such documents and records cannot be retrieve when required. 2. The grievance records at Awala site was reviewed. The records are recorded in the "Plaintes Des Salaries". However there were no records on when the grievances was resolved and if the resolution is acceptable by the complainant.
Corrections:	All grievance should be recorded into the grievance book, two copies of grievance log book will be recorded (kept by Delegate and HR)
Root Cause Analysis:	<ol style="list-style-type: none"> i) There was no proper hand over from previous HR manager to the new one. ii) Lack of grievance control and resolution book records by the previous Human Resource manager. iii) Complain procedure not well implemented by the previous HR manager
Corrective Actions:	<ol style="list-style-type: none"> i) On going forward, all grievance should be recorded into the grievance book with details of resolution, grievance closure signature and date ii) Revise the grievance procedure to be in line with current practice iii) Update grievance book on monthly basis iv) Brief worker union on new SOP and share the updated SOP with them
Assessment Conclusion:	<p>Major NC close out verification: The following evidences were sighted during on site verification;</p> <ol style="list-style-type: none"> i) All grievances were recorded in grievance book with details of resolution, grievance closure signature and date. Verified a few cases and interview with the respective complainants on the resolution process. Based on interview, they have acknowledged and accepted that their grievance has been satisfactorily resolved. Refer to individual grievance records for reference. ii) Briefing with union/workers representative was carried out on 2 August 2019 on the grievance issues and for the briefing of new revised SOP. Interview with union/workers representative has confirmed that they awareness on the changes made in the SOP and has been simplified. iii) Revised SOP, rev:6 dated 25/7/19 was made available for review. Noted some changes on the resolution process for grievance. Based on the above verification, it was confirmed that corrective action has been implemented effectively with sufficient evidence of implementation. <p>Thus, the major NC is closed on 11/8/19. Continuous implementation will be further verified in the next assessment.</p>

Summary of Total Number of Nonconformity			
Nonconformity			
NCR Ref #	1791736-201903-M4	Clause & Category (Major / Minor)	Indicator 6.5.1 Major
Date Issued	30/06/2019	Due Date	28/09/2019
Closed (Yes / No)	Yes	Date of nonconformity Closure	11/08/2019

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Statement of Nonconformity:	No salary slip was issued to the foreign workers to show the details of their salary.
Requirement Reference:	Documentation of pay and conditions shall be available.
Objective Evidence:	There is no salary slip issued to the Indonesia Foreign Workers (including non-operational workers e.g. cook/maid). Furthermore there were no P&C of the
	worker on how much they received as it has been exposed to other workers. This is observed through the salary receiving form for 21/04/2019-20/05/2019.
Corrections:	Provide individual pay slip to all foreign workers
Root Cause Analysis:	<ul style="list-style-type: none"> i) Foreign workers are not included into the payroll system ii) The current payroll system is in French language which is not understandable for foreign workers. iii) Company issues common pay slip in a table for all foreign workers
Corrective Actions:	<ul style="list-style-type: none"> i) Create attendance list for foreign workers in order to have a proper calculation base of their working time (overtimes...) ii) Issue individual pay slip to all foreign workers and a record to be kept with finance department.
Assessment Conclusion:	<p>Major NC close out verification: The following evidences were sighted during on site verification;</p> <ul style="list-style-type: none"> i) Supervisor's daily report and record of attendance has been monitored starting in month of July 2019 for each individual workers. Payroll for foreign workers has been created using SAGE for all foreign workers. ii) Interview with foreign workers (maid) has confirmed that OLAM has started to issue individual pay slip starting in month of July 2019. Total pay and deductions were detailed out in the pay slip and according to term and conditions in the employment contract. Based on the above verification, it was confirmed that corrective action has been implemented effectively with sufficient evidence of implementation. <p>Thus, the major NC is closed on 11/8/19. Continuous implementation will be further verified in the next assessment</p>

Summary of Total Number of Nonconformity			
Nonconformity			
NCR Ref #	1791736-201903-M5	Clause & Category (Major / Minor)	Indicator 6.5.2 Major
Date Issued	30/06/2019	Due Date	28/09/2019
Closed (Yes / No)	Yes	Date of nonconformity Closure	11/08/2019
Statement of Nonconformity:	The contractors' workers employment was not monitored effectively by the management unit.		
Requirement Reference:	Labour laws, union agreements or direct contracts of employment detailing payments and conditions of employment (e.g. working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc.) shall be available in the languages understood by the workers or explained carefully to them by a management official.		

<p>Objective Evidence:</p>	<ol style="list-style-type: none"> 1. According to the Decree No599/PR of the Code of Social Security, a company is required to register its worker to Caisse Nationale de Securite Sociale (CNSS) 8 days after its employment. However for contract workers under ETS Ndza Magange Traveaux ET Services, 15 samples was reviewed and no CNSS was registered and hence CNSS was not paid for the 15 samples. The employment was mainly in April and May 2019. 2. Review of the Contractors’ workers (Nadza Magange Traveaux ET Services; Service De Proximite Du Gabon; Les Jardins D’Olivier and Bance Espace Vert) employment contracts found that the contract does not include conditions such as holiday and holiday payment; terms of resignation (for Service De Proximite Du Gabon); payment of CNSS (for Service De Proximite Du Gabon); terms of resignation (for Service De Proximite Du Gabon) and maternity holiday. 3. According to Article 6 of the worker contract of ETS Ndza Magange Traveaux ET Services, when the targets are not achieved, there is a possibility 40% penalty of the salary or no salary will be paid. This is a form of forcing the labor to work in order to get their salary.
<p>Corrections:</p>	<ol style="list-style-type: none"> i) Include all relevant clauses into the contract of the contractors’workers ii) Conduct briefing to all contractors on Olam’s policy and standards. iii) CNSS registration for all contractors workers
<p>Root Cause Analysis:</p>	<ol style="list-style-type: none"> i) Olam is using contractor to increase work productivity ii) Contractors don’t have any experience on human resources management and local regulations
<p>Corrective Actions:</p>	<ol style="list-style-type: none"> i) Include all relevant clauses into the contract of the contractors’workers ii) Briefing on labour regulation and Olam’s policies for all contractors iii) All contractors workers without cnss registration after 8 days of employment must be stopped iv) Regular check by Legal & HR departments and all non-compliant contractors must be suspended v) Non-compliance will be warn, suspend and terminated. Repeated non-compliant contractors shall be terminated.
<p>Assessment Conclusion:</p>	<p>The following evidences were sighted during on site verification;</p> <ol style="list-style-type: none"> i) Meeting/briefing between contractor, HR, RSPO Manager and site head was carried out on 31/7/19. This meeting is to brief all contractors on OLAM policies and standards. Interview with contractors e.g SEPROGA has confirmed on the briefing given to them with regards to contractor's workers, CNSS registration and compliance towards OLAM policies and standard. ii) Employment contract for contractor's workers was verified and all relevant clauses has been included in accordance with Gabon's Labor/Employment Law. iii) Evidence of CNSS registration and payment was sighted the contractor ETS Ndza Magange Traveaux ET Services. iv) Latest HR and legal department audit/check was done on 18-19/7/19 for Makouke and Awala Plantation. All non-compliant contractors will be suspended. Based on the above verification, it was confirmed that corrective action has been implemented effectively with sufficient evidence of implementation. <p>Thus, the major NC is closed on 11/8/19. Continuous implementation will be further verified in the next assessment</p>

Summary of Total Number of Nonconformity			
Nonconformity			
NCR Ref #	1791736-201903-N1	Clause & Category	Indicator 4.7.5
		(Major / Minor)	Minor
Date Issued	30/06/2019	Due Date	Next annual surveillance assessment
Closed (Yes / No)	No	Date of nonconformity Closure	"Open"
Statement of Nonconformity:	Implementation of accident and emergency procedures was effectively demonstrated		
Requirement Reference:	Accident and emergency procedures shall exist and instructions shall be clearly understood by all workers. Accident procedures shall be available in the appropriate language of the workforce. Assigned operatives trained in First Aid should be present in both field and other operations, and first aid equipment shall be available at worksites. Records of all accidents shall be kept and periodically reviewed.		
Objective Evidence:	Bindo Estate No emergency drill conducted at Bindo Estate as to date. Lobe Estate Oral medication (ibuprofen and paracetamol) was found in the first aid box. Found a re-labelled alcohol bottle in the box without information of expiry date and hazard sign.		
Corrections:	i) Buy and fix an alarm system and conduct the emergency drill for Bindo ii) Remove all oral drugs from first aid kit and add expired date and item name on refilling alcohol bottles		
Root Cause Analysis:	i) Emergency preparedness at Bindo estate was not conducted to include an emergency drill as per procedure. ii) Some drugs and alcohol put into the first aid kit by nurses and not controlled by doctor in the first place		
Corrective Actions:	i) Training of nurses regarding the first aid kit contents ii) Conduct annual emergency drill for both estates and include all scenarios as per procedures e.g. fire, chemical spillage at store and oil spillage at gasoil station iii) Monthly check of all the first aid kit content Corrective action plan is accepted. Implementation of corrective action taken will be further verified in the next assessment.		
Assessment Conclusion:	Corrective action plan is accepted. Implementation of corrective action taken will be further verified in the next assessment.		

Summary of Total Number of Nonconformity			
Nonconformity			
NCR Ref #	1791736-201903-N2	Clause & Category	Indicator 4.2.2
		(Major / Minor)	Minor
Date Issued	30/06/2019	Due Date	Next annual surveillance assessment
Closed (Yes / No)	No	Date of nonconformity Closure	"Open"

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Statement of Nonconformity:	Based on records, it was found that in 2018 the actual fertiliser (NPK 11) applied in the fields of Bindo Estate was not in accordance to the recommendation from the Olam’s agronomist.
Requirement Reference:	Records of fertiliser inputs shall be maintained.
Objective Evidence:	At Bindo Estate, based on verification of SAP records, store reservation form and fertiliser recommendation from Olam’s agronomist report for 2019, it was found that the actual application of NPK 11 at the field was inconsistent with the agronomist recommendation for the following fields: Field No. Actual applied (mt) Agronomist recommendation (mt) F42 6.25 8.28 G14 1.43 3.21 B13 10.58 12.38 Further verification of total NPK 11 from SAP system found that there is a variance of 39.31 mt i.e. 759.69 mt (actual) vs. 799 mt (recommended).
Corrections:	<ul style="list-style-type: none"> i) Issue material as per agronomy recommendations ii) Update block master as per current situation (Palm census) and maintain record in case of inaccessible field. iii) Training of the tractor driver to follow instruction on speed and dosing control
Root Cause Analysis:	<ul style="list-style-type: none"> i) Agronomy recommendations is based on 143 stand per Hectare (sph), actual sph is below than 143 and field condition do not allow access (Difficult to access to some spots areas (Low lying area/grasses/ flooded area during wet season) ii) The agronomy recommendations has been received end of March 2018 iii) Various dosage due to speed of the application tractor for semi-mechanical sprayer.
Corrective Actions:	<ul style="list-style-type: none"> i) Maintain good field condition for various activities, monitor and record application activities; in case any variance, record field conditions for rectification. ii) Agronomy audit on fertilizer application
Assessment Conclusion:	Corrective action plan is accepted. Implementation of corrective action taken will be further verified in the next assessment.

Summary of Total Number of Nonconformity			
Nonconformity			
NCR Ref #	1791736-201903-N3	Clause & Category (Major / Minor)	Indicator 4.8.2 Minor
Date Issued	30/06/2019	Due Date	Next annual surveillance assessment
Closed (Yes / No)	No	Date of nonconformity Closure	“Open”
Statement of Nonconformity:	There was no evidence that training has been given to the employees of a contractor.		
Requirement Reference:	Records of training for each employee shall be maintained.		
Objective Evidence:	There was no training records available for employees of a contractor (DGNS) that has been appointed to carry out harvesting & evacuation operation at Komo Estate.		
Corrections:	i) Training to be conducted for all harvesters mentioned above		

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Root Cause Analysis:	i) Lack of coordination between operation and training department ii) High turn over of contractor workers
Corrective Actions:	i) Training database to be maintained ii) Follow the annual training program iii) Induction to be conducted CR&S and EHS for all new contractors workers iv) Contractors must inform and send all new workers for training. Any new worker without training record cannot involve in field operations
Assessment Conclusion:	Corrective action plan is accepted. Implementation of corrective action taken will be further verified in the next assessment.

Summary of Total Number of Nonconformity			
Nonconformity			
NCR Ref #	1791736-201903-N4	Clause & Category (Major / Minor)	Indicator 6.12.2 Minor
Date Issued	30/06/2019	Due Date	Next annual surveillance assessment
Closed (Yes / No)	No	Date of nonconformity Closure	"Open"
Statement of Nonconformity:	The foreign workers contract was substituted with difference terms and conditions.		
Requirement Reference:	Where applicable, it shall be demonstrated that no contract substitution has occurred.		
Objective Evidence:	OPG employed Indonesian workers as maids at Makouke estate. As per the original contract signed in Indonesia dated 15/09/2017 the salary is USD656 with daily food allowance of USD6. However, upon arrival to Gabon, a separate contract has been signed dated 23/09/2017 in which the salary now is CFA328,000 with daily food allowance of CFA3,000. This is considered contract substitution as a separate contract has been signed upon arrival to Gabon with a lower salary when it is exchanged back to Indonesian Rupiah (The USD exchange rate to Indonesian Rupiah on 15/09/2017 was USD1 to IDR13,242 while CFA to Indonesia Rupiah on 23/09/2017 was CFA1 to IDR24.172. The salary value if it is paid in USD will be IDR8,686,752 which is higher if the salary is paid in CFA which will be IDR7,928,416).		
Corrections:	i) Agreement with foreign workers in term of using CFA for salary payment ii) For previous contract signed in USD but paid in CFA, contract must be respected. Impacted workers to decide to pay according to fixed rate (USD to CFA) or market rate (non-fixed rate). ii) Official meeting to be held with impacted workers. Then, they will decide individually whether they agree to be paid in USD or CFA.		
Root Cause Analysis:	i) CFA currency is not familiar in Indonesia (not practice to put in their contract that's why company decided to put in usd) ii) Difficult to get money device with bank for exchange (usd) ii) By paying in USD, foreigner workers need to exchange the currency in CFA (local currency) to buy their goods. In another hand, when they have to send money back home, the bank still taking percentage on money exchange; at the end, they are losing 2 times money on exchange rate iv) Company has a fixed rate for dollar to CFA		

Corrective Actions:	<ul style="list-style-type: none"> i) Agreement with foreign workers to be paid in CFA. Impacted workers to decide to pay according to fixed rate (USD to CFA) or market rate (non-fixed rate). ii) Going forward, all the foreign worker’s contracts will be stated in CFA
Assessment Conclusion:	Corrective action plan is accepted. Implementation of corrective action taken will be further verified in the next assessment.

Summary of Total Number of Nonconformity			
Nonconformity			
NCR Ref #	1791736-201903-N5	Clause & Category (Major / Minor)	Indicator 6.10.1 Minor
Date Issued	30/06/2019	Due Date	Next annual surveillance assessment
Closed (Yes / No)	No	Date of nonconformity Closure	“Open”
Statement of Nonconformity:	FFB pricing was not available		
Requirement Reference:	Current and past prices paid for Fresh Fruit Bunches (FFB) shall be publicly available.		
Objective Evidence:	The price made publically available at the weighbridge was a price 3 months ago. There was no past and current pricing made publically to the smallholder. Interview with Agrofor confirms that there are not aware of the price before they sell the FFB at the mill.		
Corrections:	<ul style="list-style-type: none"> i) Update FFB pricing ii) Actual prices of CPO will be displayed in mill base on actual sales (monthly basis) and FFBS 		
Root Cause Analysis:	<ul style="list-style-type: none"> i) No update of the prices. ii) Past prices not publicly displayed but communicated individually to AGROFOR who is the only FFB seller to Olam 		
Corrective Actions:	<ul style="list-style-type: none"> i) Update FFB prices on monthly basis and published historical pricing and current pricing at weighbridge station. ii) Inform AGROFOR (Smallholder) by mail on the updated prices and previous 3 months pricing. iii) Annual internal audit on RSPO P&C 		
Assessment Conclusion:	Corrective action plan is accepted. Implementation of corrective action taken will be further verified in the next assessment.		

Opportunity for Improvements	
OFI #	Description
OFI 1	<p>1791736-201903-I1</p> <p>Indicator 4.7.1 The health and safety plan shall cover the following: A health and safety policy shall be in place. A health and safety plan covering all activities shall be documented and implemented, and its effectiveness monitored.</p> <p>Details: QSHE inspection process can be further improved on the; <ul style="list-style-type: none"> i) Completeness of PPE based on PPE matrix and MSDS recommendation </p>

	ii) Vehicle check and maintenance (safety device)
OFI 2	<p>1791736-201903-I2</p> <p>Indicator 6.5.2 Labour laws, union agreements or direct contracts of employment detailing payments and conditions of employment (e.g. working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc.) shall be available in the languages understood by the workers or explained carefully to them by a management official.</p> <p>Details: Indonesian worker at Makouke site found to have no valid Carte de Sejour (CDS). The application of the CDS was valid until 30/03/2019. The company shall continue to follow up with the immigration department to ensure the CDS is being issued.</p>
OFI 3	<p>1791736-201903-I3</p> <p>Indicator 6.5.3 Growers and millers shall provide adequate housing, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible.</p> <p>Details: The sanitization of the Makouke site housing facilities could be improved.</p>
OFI 4	<p>1791736-201903-I4</p> <p>Indicator 6.6.2 Minutes of meetings with main trade unions or workers’ representatives shall be documented.</p> <p>Details: The sharing of the meeting minutes was not consistently send to the top management at Awala site. The practice shall be consistent within the sites. Retaining of workers’ representative meeting records especially at Awala Site could be improved.</p>
OFI 5	<p>1791736-201903-I5</p> <p>E.5 RSPO Supply Chain</p> <p>Details: The daily production of the PK can be improved to identify the certified amount and uncertified amount transferred to the KCP. This is to determine that the transfer amount of the certified material output are not more that the material inputs on daily basis.</p>

Positive Findings	
PF #	Description
PF 1	OPG has demonstrate shared responsibility where by the implementation of RSPO P&C has also extended to the Kernel Crushing Plant.
PF 2	Olam as a group has demonstrated compliance throughout its’ group of management units by implementing corrective actions found in other management unit RSPO P&C assessment.

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3.4.1 Status of Nonconformities Previously Identified and Observations

Summary of Total Number of Nonconformity			
Nonconformity			
NCR Ref #	1642049-201806-M1	Clause & Category (Major/Minor)	RSPO SCCS 5.3.2 Major
Closed (Yes/No)	Yes	Date of nonconformity closure	01/08/2018
Statement of Nonconformity	No evidence to show that internal audit was carried out for Awala Palm Oil Mill.		
Requirement Reference	<p>The site shall have a written procedure to conduct annual internal audit to determine whether the organization;</p> <p>i) conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.</p> <p>ii) effectively implements and maintains the standard requirements within its organization</p>		
Objective Evidence	Verified the internal audit report found that the audit was only covered for KCP. No evidence to show that there was internal audit conducted for Awala POM.		
Corrective Action	<p>See Annex 1: An integrated compliance implementation programme (Work Progress Monitoring) with responsible person and comprehensive list of activities has been updated. The four relevant activities integrated as part of this programme are:</p> <ol style="list-style-type: none"> a. Management Review Meeting for SCCS b. Management Review Meeting for P&C c. Monthly mass balance sheet update d. Quarterly palm trace announcement <p>Annex 2: Final Internal SCCS Audit Report for POM has been updated.</p>		
Assessment Conclusion	<p>Verification during ASA3: The latest internal audit was carried out from 28/11/18 to 1/12/18 combined with RSPO P&C and RSPO SCCS for KCP. Report dated 1/12/18 was verified. No recurrence of issue found, thus the previous major NC is remain closed.</p>		

Summary of Total Number of Nonconformity			
Nonconformity			
NCR Ref #	1642049-201806-N1	Clause & Category (Major/Minor)	Indicator 5.6.3 Minor
Closed (Yes/No)	Yes	Date of nonconformity closure	30/09/2019
Statement of Nonconformity	Some data in the RSPO GHG reporting format for 2017 are not consistent with the data in the recording system.		
Requirement Reference	A monitoring system shall be in place, with regular reporting on progress for these significant pollutants and emissions from estate and mill operations, using appropriate tools.		

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Objective Evidence	For the year of 2017 data input, some inconsistency data between the RSPO GHG calculator and recording system (e.g. SAP) was found as follows: 1) consumption of NPK 11 fertiliser: 1,777 mt (in RSPO calculator) vs. 1,848 mt (in SAP system) 2) consumption of MOP fertiliser: 24.45 mt (in RSPO calculator) vs. 0 mt (in SAP system) 3) consumption of diesel: 1,221,558 lt (in RSPO calculator) vs. 1,098,407 lt (in SAP system) 4) Conservation area: 12,852 Ha (in RSPO calculator) vs. 12,482 Ha (in area statement)
Corrective Action	1. Consolidate all data points of Palm GHG and cross reference with various data source including SAP. 2. Investigate variances and provide proper record of identification. 3. Use validated data for PalmGHG reporting.
Assessment Conclusion	Verification during ASA3: Verification of data in SAP system, fertiliser reservation form, diesel issuance records and area statement for 2018, showed that all the input data in GHG calculator was consistent. The continuous effectiveness of implementation will be verified in the next assessment. Thus, the NC is closed effectively on 30/6/19.

Opportunity for Improvement	
OFI#	Description
OFI 1	

3.4.2 Summary of the Nonconformities and Status

CAR Ref.	Category (Major / Minor)	P&C Indicator	Issued Date	Status & Date (Closure)
1171760M1	Major	4.7.2	4/6/2016	Closed out on 24/6/2016
1328437N1	Minor	4.7.5	4/6/2016	Closed out on 21/6/2017
1328437N2	Minor	5.3.3	4/6/2016	Closed out on 21/6/2017
1491644-201706-N1	Minor	5.6.3	21/6/2017	Closed out on 3/7/2018
1642049-201806-M1	Major	SCCS 5.3.2	7/7/2018	Closed out on 1/8/2018
1642049-201806-N1	Minor	5.6.3	7/7/2018	Closed out on 30/06/2019
1791736-201903-M1	Major	4.6.11	30/06/2019	Closed out on 11/08/2019
1791736-201903-M2	Major	2.2.1	30/06/2019	Closed out on 11/08/2019
1791736-201903-M3	Major	6.3.2	30/06/2019	Closed out on 11/08/2019
1791736-201903-M4	Major	6.5.1	30/06/2019	Closed out on 11/08/2019
1791736-201903-M5	Major	6.5.2	30/06/2019	Closed out on 11/08/2019
1791736-201903-N1	Minor	4.7.5	30/06/2019	"Open"
1791736-201903-N2	Minor	4.2.2	30/06/2019	"Open"
1791736-201903-N3	Minor	4.8.2	30/06/2019	"Open"
1791736-201903-N4	Minor	6.12.2	30/06/2019	"Open"
1791736-201903-N5	Minor	6.10.1	30/06/2019	"Open"

3.5. Stakeholders 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 Awala 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.

List of Stakeholders Contacted	
Internal Stakeholders Workers from mill Workers from estates Foreign workers Workers Union Gender Committee	Union/Contractors/Local Communities Previous Land user – Woubele 2 village Previous Land user – Bindo village Previous Land user – Makouke village Previous Land user – Mbolani village
Government Departments Department of Water and Forestry Makouke Sous Prefet	NGO Due to no significant complaints found prior the audit, no NGO was contacted in this assessment.

IS #	Description
1	<p>Feedbacks: Workers Representative The workers representative informed the assessment team that on monthly basis, there are cases of salary wrongly calculated. This has caused a lot of hassle of the delegates to attend to such errors repeatedly.</p> <p>Management Responses: In order to ensure systematic attendance record, Olam Palm Gabon has rolled out SAGE system – attendance is electronically recorded based on palm print on daily basis and every worker must sign in the attendance sheet (supervisor daily record) after the work Workers could choose to get salary paid twice a month (advancement) or only by month end. Advancement taken will be deducted from month end salary. In case of any dispute on salary, record of attendance and advancement are available to ensure fair calculation mechanism.</p> <p>Audit team findings: The assessment team had interviewed the management representative. The management had implemented controls to inform the workers on daily basis during the master call on the attendance on the previous day. This is to allow the dispute on the attendance before the salary is being calculated. The assessment team had checked the mechanism of the salary. In case of such dispute, the salary will be paid in the next salary. The assessment team deemed that the mechanism is effective to ensure any dispute is salary, there is investigation and repayment.</p>

2	Feedbacks: Previous land users (Makouke Village) & Sous Prefet Makouke There is no sufficient land for the village to have expansion on their activity.
	Management Responses: Makouke concession was developed since 1960s and there are seven villages located within the concessions, due to availability of facilities such as school, water and electricity, population size has increased in the past 60 years, 20 ha has been allocated as part of the social agreement plan finalized in H1 2019. On the other hand, company is obliged to protect critical ecosystem such as HCV area and prevent conversion of such area
	Audit team findings: The housing expansion planning of Makouke Site was reviewed by the assessment team. OPG has established a long term housing plan to relocate all the workers' housing to within the plantations. Hence, those existing workers' houses and/or land where the houses are, will be surrender to the community for their activity.
3	Feedbacks: Previous land users (Bindo Village) There were no priority to employ the villagers to work for OPG.
	Management Responses: There are total 34 villagers from Bindo village (26 men; 8 women) working with Olam Palm Gabon in Makouke concession. However, villagers are demanding office position which are currently not available. There are total 71 households in Bindo village
	Audit team findings: This will be further verified in the next assessment on the employment opportunity for other vacant position.
4	Feedbacks: Agrofor (smallholders) In order to encourage more land owner to plant oil palm, OPG should offer a better price.
	Management Responses: Pricing is calculated based on global benchmark and pricing mechanism is stated in the contract.
	Audit team findings: The assessment team had reviewed the FFB pricing offered to the smallholder. The price is calculated following the Rotterdam + processing pricing. However the latest pricing where not displace in the mill for the information of any other smallholders that are interested to sell the FFB to the mill. Hence non-compliance 1795940-201903-N2 was raised.
5	Feedbacks: Makouke Sous Prefet OPG is taking much longer time to make decision when it is requested by the community.
	Management Responses: OPG has finalized a social agreement in 2019 with impacted villages to outline our annual commitment on infrastructure establishment. This commitment is including into annual budget and progress is tracked during quarterly community steering committee meeting.. Unbudgeted items or additional request will need management approval.
	Audit team findings: This will be further verified in the next assessment
6	Feedbacks: Kango Forest Department No significant comments from this village.
	Management Responses: OPG will continue to engage all relevant stakeholders to ensure timely feedback
	Audit team findings: This will be further verified in the next assessment
	Feedbacks: Previous land users (Mbolani Village and Woubele 2) No significant comments from these villages.

7	Management Responses: OPG will continue to engage all relevant stakeholders to ensure timely feedback.
	Audit team findings: This will be further verified in the next assessment

Formal Signing-off of Assessment Conclusion and Recommendation	
<p>The audit objectives have been achieved and the certificate scope remains appropriate. Based on the results of this audit, it is concluded that Awala Palm Oil Mill has complied with the RSPO Supply Chain Certification Standard (June 2017) and audit criteria identified within the audit report. It is deemed that the management system continues to achieve its intended outcomes. Therefore, it is recommended that the certification of Awala Palm Oil Mill Certification Unit is approved and continued with the inclusion of estates namely Bindo and Makouke Estate in the scope of certification.</p>	
Report prepared by	Acceptance of Assessment Conclusion
Name: Mohamed Hidhir Zainal Abidin	Name: Audrey Lee Mei Fong
Company Name: BSI Services Malaysia Sdn Bhd	Company Name: Olam International Ltd.
Title: Lead auditor	Title: Sustainability General Manager
Signature: 	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> 
Date: 18 th September 2019	Date: 19 th September 2019

Appendix A: Summary of Findings

Criterion / Indicator	Assessment Findings	Compliance
Principle 1: Commitment to Transparency		
Criterion 1.1		
Growers and millers provide adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow the effective participation in decision making		
1.1.1 There shall be evidence that growers and millers provide adequate information on (environmental, social and/or legal) issues relevant to RSPO Criteria to relevant stakeholders for effective participation in decision making -Major compliance-	<p>The Procedure of Management of Applications of Information, Doc. No.: SOP N°005/CRS DI(3)/0518, version 3 dated 04/06/2018 was established to manage information request from relevant stakeholders. The procedures has been established that within 12 days, the request from the stakeholders shall be addressed. Documents that were made publicly available to the stakeholders includes HCV reports, all the procedures, social contracts, management plans for social and environment and policies.</p> <p>The procedure was communicated to the local community. Sample of communication with Ayeme-Bokoue 2 and Agricole Frontiere was reviewed.</p>	Complied
1.1.2 Records of the requests for information and responses shall be maintained -Major compliance-	<p>There was no request of information from the communities or surrounding stakeholders since last audit.</p> <p>On a Global level, Olam has received information request since last audit. Sample of the information request from Pladis Global. The information request was on 15/05/2018 and it was responded on 16/05/2018.</p>	Complied

Criterion / Indicator	Assessment Findings	Compliance	
Criterion 1.2 Management documents are publicly available, except where this is prevented by commercial confidentiality or where disclosure of information would result in negative environmental or social outcomes.			
1.2.1	Publicly available documents shall include, but are not necessarily limited to: <ul style="list-style-type: none"> • Land titles/user rights (Criterion 2.2); • Occupational health and safety plans (Criterion 4.7); • Plans and impact assessments relating to environmental and social impacts (Criteria 5.1, 6.1, 7.1 and 7.8); • HCV documentation (Criteria 5.2 and 7.3); • Pollution prevention and reduction plans (Criterion 5.6); • Details of complaints and grievances (Criterion 6.3); • Negotiation procedures (Criterion 6.4); • Continual improvement plans (Criterion 8.1); • Public summary of certification assessment report; • Human Rights Policy (Criterion 6.13). -Major compliance-	The list of documents that are made available to the public are stated in the Procedure of Management of Applications Information, Doc. No.: SOP N°005/CRS DI(3)/0518, version 3 dated 04/06/2018. The Company's Sustainability Policies were also published in https://www.olamgroup.com/sustainability/policies-codes-standards.html In addition to the website, the policies were also displayed at various locations at the operating units including the main notice boards of the estates, mill offices and muster ground notice boards for employees and visitors to view.	Complied
Criterion 1.3 Growers and millers commit to ethical conduct in all business operations and transactions			
1.3.1	There shall be a written policy committing to a code of ethical conduct and integrity in all operations and transactions, which shall be documented and communicated to all levels of the workforce and operations -Minor compliance-	The Olam Group Code of Conduct dated Feb 2016 has been established has included the UN Convention Against Corruption in particular to Article 12 committing to maintain complete and accurate books and records of account recording all business transactions and dealings entered into for or on behalf of or conducted in connection with the Company. The Code of Conduct is available in both English and French.	Complied

Criterion / Indicator	Assessment Findings	Compliance
	<p>The Code of Conduct has been published in the Olam website https://www.olamgroup.com/content/dam/olamgroup/pdf/policies%2c-codes%2c-standards/Olam%20Code%20Of%20Conduct.pdf</p> <p>The OPG Code of Conduct dated 30/4/2014 was established specifically for the palm operations of Olam. The Code of Conduct book has clearly explained the companies of Olam in Gabon and their employees ban any practice of passive or active way consisting in proposing money or service to someone detaining a power in order to get a favour. Corruption is banned and they do not accept any gifts or liberalities with above market value. In addition, Olam has the objective of conducting business in compliance with the letter and spirit of the law. Briefing of the code of conduct was conducted and a book of code of conduct was given to every workers during their employment in the company.</p>	
Principle 2: Compliance with Applicable Laws And Regulations		
Criterion 2.1 There is compliance with all applicable local, national and ratified international laws and regulations.		
2.1.1 Evidence of compliance with relevant legal requirements shall be available -Major compliance-	<p>The following documented evidence was available:</p> <ul style="list-style-type: none"> - No. 01/LEG LIST/0619, dated 06/2019 (Legal Register) includes: <ul style="list-style-type: none"> • Land • Business / Tax • Employment / Social Security • Environmental • Sustainable Development • Forest and Fauna • Agricultural • Health Security • Trade <p>Some examples of evidence of compliance:</p>	<p>Complied</p>

Criterion / Indicator	Assessment Findings	Compliance
	<ul style="list-style-type: none"> - Environmental Impact Study for Olam Palm Gabon dated May 2011 - Certificate of Conformance issued by the Director General of the Environment and the Protection of Nature dated 02 April 2011 - Draft AIC Legal Compliance Audit dated May 2018 - Landfill permit for Makouke Complex, #000360/MFEPC/SG/DGEPN/DECDE/CSECD, dated 1/4/2019 	
<p>2.1.2</p>	<p>A documented system, which includes written information on legal requirements, shall be maintained. -Minor compliance-</p>	<p>List of applicable legal requirements was made available in the "Liste des Lois et Conventions Applicables au Projet Olam Palm Gabon" [No. 01/LEG LIST/0619, dated 06/2019]. The list was last updated on 06/2019.</p> <p>Complied</p>
<p>2.1.3</p>	<p>A mechanism for ensuring compliance shall be implemented. -Minor compliance-</p>	<p>Olam has appointed a consultant to conduct compliance audit. E.g., the last compliance audit at Awala complex was conducted in 15/1/2019 covering the legal compliance status related to environmental, social security, security relating to transportation of personnel and goods, tax, labour law and law related to contractors agreement. Among the findings highlighted by the consultant were:</p> <ul style="list-style-type: none"> • road safety policy that did not comply with the relevant regulation (i.e. 30 minutes break after 4 hours of driving) • trucks carrying FFB was overloaded i.e. 14.92 mt and 15.98 mt whereby limit is 13.5 mt • some allowance or benefits such as water/electricity, housing allowance, transport allowance to workers were not deducted for tax • benefit from transport allowance for some workers were not included in the CNAMGS (medical insurance) <p>Since some of the final audit outcome has just been received by Awala on 26/6/2019, the findings have yet to be closed.</p> <p>Complied</p>

Criterion / Indicator		Assessment Findings	Compliance								
2.1.4	A system for tracking any changes in the law shall be implemented -Minor compliance-	Apart from the conducting legal compliance audit, the consultant mentioned in 2.1.3 was also required to provide updates on any changes in applicable law to OPG. This is verifiable through the Proposition of Services dated 15/1/2019 from the consultant to OPG. Only one new law i.e. Arrete No. 937/MEFEDD/SG/DGFAP du Juillet 2018 was updated in the legal register ever since the last version (0518).	Complied								
Criterion 2.2: 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											
2.2.1	Documents showing legal ownership or lease, history of land tenure and the actual legal use of the land shall be available. -Major compliance-	<p>Documents showing legal ownership or lease, history of land tenure and the actual legal use of the land was made available.</p> <p>There are total of Makouke and Bindo concessions area awarded to Olam Palm Gabon located at Makouke, province of Moyen Ogooue. An official letter issued by Ministry of Economy and Prospective of Development Programme in charge of the Promotion of Public and Private Investment. Requisition For Land Immatriculation, R I 12 573 dated 10 May 2016 was sighted. Transfer of lease by SIAT Gabon in the benefit of OLAM Gabon for the remaining lease duration until 15/4/2054 established on 30/10/16. Transcript of land register dated 27/1/17.</p> <p>Summary of land concession agreement as per follow:</p> <table border="1"> <thead> <tr> <th>Land lease</th> <th>Concession area</th> <th>Lease period</th> <th>Land use type</th> </tr> </thead> <tbody> <tr> <td>Convention no. 0000705 (National Agency of Urbanism and</td> <td>98,984,957 m² @ 9,998 ha Province: Moyen Ogooue</td> <td>38 years (effective from 15/4/16 - 14/4/54)</td> <td>Plantation of oil palm</td> </tr> </tbody> </table>	Land lease	Concession area	Lease period	Land use type	Convention no. 0000705 (National Agency of Urbanism and	98,984,957 m ² @ 9,998 ha Province: Moyen Ogooue	38 years (effective from 15/4/16 - 14/4/54)	Plantation of oil palm	Major nonconformance
Land lease	Concession area	Lease period	Land use type								
Convention no. 0000705 (National Agency of Urbanism and	98,984,957 m ² @ 9,998 ha Province: Moyen Ogooue	38 years (effective from 15/4/16 - 14/4/54)	Plantation of oil palm								

Criterion / Indicator		Assessment Findings				Compliance
		Department of Land and Topography)	Location: Makouke			
		Convention no. 0000707 (National Agency of Urbanism and Department of Land and Topography	54,882,048 m ² @ 5,488 ha Province: Moyen Ogooue Location: Bindo-Bifoun	45 years (effective from 15/4/16 - 21/4/61)	Plantation of oil palm	
		Convention no. 697 (National Agency of Urbanism and Department of Land and Topography	33,309,838 m ² @ 3,330 ha Province: Moyen Ogooue Location: Bindo	Property owned (freehold)	Agriculture	
		Convention no. 001 (Ministry of Econmic, Trade, Industry and Tourism)	Total area: 20,030 ha Province: Estuaire (lot 8) Location: Komo Kango	50 years (10/1/13 – 9/1/63)	Plantation of agriculture crop mainly oil palm	
		<u>Bindo Estate</u>				

Criterion / Indicator	Assessment Findings	Compliance
	<p>2.97 ha of oil palm planted outside concession area at block E43 and F42 at verified on site at GPS coordinate location 0° 24' 30.456" N, 10° 23' 21.191" E. Documents showing legal ownership for overplanted area was not made available for verification. Thus, a major NC was issued.</p>	
<p>2.2.2</p>	<p>Legal boundaries shall be clearly demarcated and visibly maintained. -Minor compliance-</p> <p>Legal boundaries were clearly demarcated by putting concrete pegs painted with red and white colour at the critical points of the land concession. Physical boundary as such trenches was also constructed to clearly demarcate the area. The trenches also are part of mitigation to prevent elephant intrusion at newly planted area. Demarcation of boundaries as sighted during field visit was done by planting concrete pegs 6"x6", boundary roads, painting red belt on trees and elephant trenches. Verification was done at the following points:</p> <p>0°24'41"S 10°25'35"E (at Bindo Estate) 0°3'32"S 10°10'24"E (at Lobe Estate)</p> <p><u>Lobe Estate</u> Overplanted of 120 ha over logging concessionaire Peng Xin Sarl area on the southern boundary of the estate. Verified in the meeting minute between Olam Palm Gabon representative (Director of CRS) and company representative witnessed by Director of Forestry department on 21/10/16. Both parties agreed on the compensation amount for the overplanted areas. Issue has been resolved and no claim made by the logging concessionaire as to date.</p> <p><u>Bokoue Estate</u> Overplanted of 62.01 ha over logging concessionaire Hua Jia area on the west boundary of the estate. Verified in the meeting minute between Olam Palm Gabon representative (Director of CRS) and company representative witnessed by Director of Forestry department on 17/5/16. Both parties agreed on the compensation amount for the overplanted</p>	<p>Complied</p>

Criterion / Indicator		Assessment Findings	Compliance
		areas. Issue has been resolved and no claim made by the logging concessionaire as to date.	
2.2.3	Where there are or have been disputes, additional proof of legal acquisition of title and evidence that fair compensation has been made to previous owners and occupants shall be available, and that these have been accepted with free, prior and informed consent (FPIC). -Major compliance-	The Makouke Estate and Bindo-Benin Estate was acquired by OPG from SIAT Gabon. During interview with local communities and local authority, there was no evidence of any land dispute had recorded. However, OPG has established the <i>Procédure de Conduite du Processus CLIP</i> (Procedure to conduct FPIC) SOP No 01/CRS CLIP (3)/0319 rev 03 dated April 2019 is established to ensure Free, Prior & Inform Consent if there is any dispute.	Complied
2.2.4	There shall be an absence of significant land conflict, unless requirements for acceptable conflict resolution processes (see Criteria 6.3 and 6.4) are implemented and accepted by the parties involved. -Major compliance-	During interview with local communities and local authority at Makouke, there was no evidence of any land dispute had recorded. Please refer to 6.3 and 6.4 for the procedures in managing land disputes.	Complied
2.2.5	For any conflict or dispute over the land, the extent of the disputed area shall be mapped out in a participatory way with involvement of affected parties (including neighbouring communities where applicable). -Minor compliance-	During interview with local communities and local authority at Makouke, there was no evidence of any land dispute had recorded. Please refer to 6.3 and 6.4 for the procedures in managing land disputes.	Complied
2.2.6	To avoid escalation of conflict, there shall be no evidence that palm oil operations have instigated violence in maintaining peace and order in their current and planned operations. -Major compliance-	During interview with local communities and local authority at Makouke, there was no evidence of any land dispute had recorded.	Complied
Criterion 2.3:			
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.			
2.3.1	Maps of an appropriate scale showing the extent of recognised legal, customary or user rights (Criteria 2.2, 7.5 and 7.6) shall be developed through	Participatory mapping was conducted between 26-29 June 2017 with Amaneone, Bataillon, Bindo, Eyameyong, Fernan vaz, Makouke, Saio, Maguiela and Ngosso and Mgouabilaghe villages. The participatory	Complied

Criterion / Indicator	Assessment Findings	Compliance
	participatory mapping involving affected parties (including neighbouring communities where applicable, and relevant authorities) -Major compliance-	mapping final report dated September 2017 is available to show the maps of the user rights. Maps of the participatory mapping are kept by the local village leader.
2.3.2	Copies of negotiated agreements detailing the process of free, prior and informed consent (FPIC) (Criteria 2.2.,7.5 and 7.6) shall be available and shall include: a) Evidence that a plan has been developed through consultation and discussion with all affected groups in the communities, and that information has been provided to all affected groups, including information on the steps that shall be taken to involve them in decision making; b) Evidence that the company has respected communities' decisions to give or withhold their consent to the operation at the time that this decision was taken; c) Evidence that the legal, economic, environmental and social implications for 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 company's title, concession or lease on the land. -Major compliance-	Complied
2.3.3	All relevant information shall be available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements. -Minor compliance-	Local Community are able to show the assessment team on the records of meeting and agreements established between OPG and the village. The documentation are in French.

Criterion / Indicator		Assessment Findings	Compliance						
2.3.4	Evidence shall be available to show that communities are represented through institutions or representatives of their own choosing, including legal counsel. -Major compliance-	The local community are represented by the chief of village and local authorities. Interviewed with the local authority confirmed that the local community are represented fairly.	Complied						
Principle 3: Commitment to Long-Term Economic and Financial Viability									
Criterion 3.1 There is an implemented management plan that aims to achieve long-term economic and financial viability									
3.1.1	A business or management plan (minimum three years) shall be documented that includes, where appropriate, a business case for schemesmallholders. -Major compliance-	<p>Awala Plantation (Awala Palm Oil Mill and supply bases) have established and implemented its commitment to long term sustainability and improvements through a capital expenditure programme. Budget and 7 years management plan (projections 2017- 2024) was verified during the audit. Awala Palm Oil Mill and supply bases have made progress towards achieving their performance production targets for the current financial year.</p> <p>OPG has gazetted long range business plan (OPEX and CAPEX: FY2019 - FY2041) for Makouke Concession and Awala Plantation. 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 emolument) and in-direct cost (corporate allocation). CAPEX allocation for 2019 has included budget on safety and health, social and welfare as well as for operation. Example of CAPEX as per below table:</p> <table border="1" data-bbox="958 1171 1742 1350"> <thead> <tr> <th>Allocation</th> <th>CAPEX</th> <th>Remarks</th> </tr> </thead> <tbody> <tr> <td>Building and houses + EHS</td> <td>2019 – G10 house (16 blocks x 10: 160 houses), new ambulance,</td> <td>Makouke Concession</td> </tr> </tbody> </table>	Allocation	CAPEX	Remarks	Building and houses + EHS	2019 – G10 house (16 blocks x 10: 160 houses), new ambulance,	Makouke Concession	Complied
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Building and houses + EHS	2019 – G10 house (16 blocks x 10: 160 houses), new ambulance,	Makouke Concession							

Criterion / Indicator		Assessment Findings			Compliance
			incinerator for clinical waste		
		Plant and machinery	2020 – workers transport, road grader, wheel loader, compactor		
		Building and houses + EHS	G10 houses (14 block x 10: 140 houses), 1 primary school	Awala Plantation	
		Plant and machinery	2019 – water treatment plant & bore wells 2019 – vehicle (trailers x 6) 2020 – stores (chemical & fertilizer) 2019 – fuel feeding/moving floor system for boiler		
3.1.2	An annual replanting programme projected for a minimum of five years (but longer where necessary to	There will be no replanting at least for the next 20-25 years for Makouke Concession and Awala Plantation as the first planting was done in 2006 and 2012.			Complied

Criterion / Indicator		Assessment Findings	Compliance												
	reflect the management of fragile soils, see Criterion 4.3), with yearly review, shall be available. -Minor compliance-														
Principle 4: Use of Appropriate Best Practices by Growers and Millers															
Criterion 4.1: Operating procedures are appropriately documented, consistently implemented and monitored.															
4.1.1	Standard Operating Procedures (SOPs) for estates and mills shall be documented. -Major compliance-	<p>Olam Palm Gabon Estates continued to implement the SOPs for the estate are documented in "Olam Palm Gabon-Agriculture Policy Manual Volume 1 and Volume 2" dated April 2013 endorsed by Olam Global Head of Plantation. Volume 1 and 2 of the Agriculture Policy Manual consist of 20 SOPs covering all operations (immature and mature planting) from land preparation and clearing, nursery establishment, planting technique, harvesting, FFB evacuation, field upkeep, IPM practices, water management and drainage system, innovative mechanization practices and etc.</p> <p>Additional SOP on Chapter 15: IPM Practices dated 25/11/17, entitled OPG Agriculture Circular no.3: Treatment and Management of Rhynchophorus Phoenicis</p> <p><u>Method of disposal (phyto-sanitary disposal) *late stage</u> Control burning in a 200 litre drum with supervision and ensuring smoke is absent when leaving location of drum. Treatment as per pesticides recommendation No WHO class 1A and 1B allowed to be used. Only class III and class II with allowed provided with SDS information for the chemical.</p> <table border="1"> <thead> <tr> <th>Active ingredient</th> <th>Trade name</th> <th>Remarks</th> </tr> </thead> <tbody> <tr> <td>Deltamethrin</td> <td>Tenega/Decis</td> <td>Insecticide</td> </tr> <tr> <td>Captan</td> <td>Thiram/Criptan</td> <td>Fungicide</td> </tr> <tr> <td>Abamectin</td> <td>Acarius</td> <td>Insecticide</td> </tr> </tbody> </table>	Active ingredient	Trade name	Remarks	Deltamethrin	Tenega/Decis	Insecticide	Captan	Thiram/Criptan	Fungicide	Abamectin	Acarius	Insecticide	Complied
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Criterion / Indicator	Assessment Findings	Compliance
	<p>For palm oil mill operation, set of SOPs were documented under "Olam Palm Gabon-Standard Operating Procedure for Palm Oil Mill, dated 24th April 2015", which consist of 14 SOPs covering all operations including starting from reception station and fruit handling, sterilization and pressing, pressing and clarification station, kernel recovery station, boiler station, power generation station, laboratory, water treatment plant, ETP operation, workshop and maintenance. As for RSPO SCC implementation, RSPO Supply Chain & Traceability (Mass Balance Model), ref: APOM-SC/MB/001; rev: 3 dated 23/5/19 is referred to. This procedure has explained on the handling of incoming FFB, processing and outgoing Crude Palm Oil (CPO) and Palm Kernel (PK) for the traceability with Mass Balance model covering certified and non-certified FFB received.</p>	
<p>4.1.2</p>	<p>A mechanism to check consistent implementation of procedures shall be in place. -Minor compliance-</p>	<p>Mechanism to check consistent implementation of procedures are in place through internal check and balance by the operation and sustainability team. The inspection was conducted based on the Agriculture Policy Manual, Chapter 17: Field Quality Audit. On top of the audit, agronomist team will regularly provide solutions and recommendations related to operational field practices.</p> <p>Complied</p>
<p>4.1.3</p>	<p>Records of monitoring and any actions taken shall be maintained and available, as appropriate. -Minor compliance-</p>	<p>Records of monitoring were maintained and made available at all visited operating units. Example of monitoring records checked:</p> <p>i) Internal audit report (RSPO P&C) for Makouke Consession and Awala, audit date: 28/11/2018 to 1/12/2018. Status of closure is being monitored and tabled under RSPO P&C action plan by the management team. Latest update dated for June 2019. Majority of the findings were closed and there were a few findings which still in progress.</p> <p>ii) Field Quality Audit (Monthly summary report)</p> <p>Complied</p>

Criterion / Indicator		Assessment Findings	Compliance
		<p>Makouke Consession monthly report summary by agronomist department for May 2019 available for review. The report contains harvesting audit, FFB grading, fertilizer application summary, manuring audit (immature and mature), pest and disease and drip irrigation system status. Awala Plantation – Refer to report ref: 02/06/2019 for May 2019.</p> <p>iii) Annual agronomic report, 2nd report dated October 2018. Summary of palm status, leaf nutrient survey, crop productivity and 2019 fertilizer recommendation were presented in the report.</p>	
4.1.4	The mill shall record the origins of all third-party sourced Fresh Fruit Bunches (FFB). -Major compliance-	Awala Palm Oil Mill continued to maintain and monitor daily record of various source of FFB (from Awala’s supply base as well as Olam’s other plantation and one out grower). The records showed the origin of FFB, weight, transporter’s details and number of bunches received through SAP and smart card system.	Complied
Criterion 4.2:			
Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.			
4.2.1	There shall be evidence that good agriculture practices, as contained in Standard Operating Procedures (SOPs), are followed to manage soil fertility to a level that ensures optimal and sustained yield, where possible. -Major compliance-	OPG’s Agriculture Policy Manual (APM) Chapter 7 covers the procedure for fertiliser application for both immature and mature. The procedure gives the guideline type of fertilisers to be used, timing to apply, dosage and placement. Whereas Safe Operating Procedure for manuring mention about tools to be used for this operation.	Complied
4.2.2	Records of fertiliser inputs shall be maintained. -Minor compliance-	<p>Inputs of fertilisers were recorded in “Material Reservation Slip”, which have the information about type of fertiliser, quantity (bags and kg), dates of issuance and field number.</p> <p>At Bindo Estate, based on verification of SAP records, store reservation form and fertiliser recommendation from Olam’s agronomist report for 2019, it was found that the actual application of NPK 11 at the field was</p>	Minor nonconformance

Criterion / Indicator		Assessment Findings	Compliance												
		<p>inconsistent with the agronomist recommendation for the following fields:</p> <table border="1"> <thead> <tr> <th>Field No.</th> <th>Actual applied (mt)</th> <th>Agronomist recommendation (mt)</th> </tr> </thead> <tbody> <tr> <td>F42</td> <td>6.25</td> <td>8.28</td> </tr> <tr> <td>G14</td> <td>1.43</td> <td>3.21</td> </tr> <tr> <td>B13</td> <td>10.58</td> <td>12.38</td> </tr> </tbody> </table> <p>Further verification of total NPK 11 from SAP system found that there is a variance of 39.31 mt i.e. 759.69 mt (actual) vs. 799 mt (recommended). Thus a non-conformity report was assigned due to this lapse.</p> <p>In Boukue, verification of 3 blocks (i.e. Block 120, 127 and 136) showed that the actual issuance was consistent with the agronomist recommendation.</p>	Field No.	Actual applied (mt)	Agronomist recommendation (mt)	F42	6.25	8.28	G14	1.43	3.21	B13	10.58	12.38	
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G14	1.43	3.21													
B13	10.58	12.38													
4.2.3	There shall be evidence of periodic tissue and soil sampling to monitor changes in nutrient status. -Major compliance-	Periodic tissue and soil sampling to monitor the changes in nutrient status was done and reports were available for verification. The results of the analysis were used by the agronomist for their recommendation for fertilisers applications programme. For e.g. at Makouke Estate, leaf sampling analysis was last done in February 2018 (ref.: agronomist report dated February 2018. Soil sampling and analysis was last done in October 2018 [ref.: Soils of Makouke Plantation, Ogooue Et Lacs Depsartment, Moyen-Ogooue Province, Republic of Gabon, Africa].	Complied												

Criterion / Indicator	Assessment Findings	Compliance
4.2.4 A nutrient recycling strategy shall be in place, and may include use of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), and palm residues after replanting. -Minor compliance-	EFB application is done as part of nutrient recycling strategy and recorded regularly. All EFB were sourced from Awala POM. The best practice of EFB application is described in the APM. Records were available for verification. Based on the records, it was noted that the rate per hectare is 40 mt/Ha. There is no application of EFB or POME at Makouke due to the far distance from Awala POM.	Complied
Criterion 4.3 Practices minimize and control erosion and degradation of soils.		
4.3.1 Maps of any fragile soils shall be available. -Major compliance-	Soil series maps were available at all the visited estates. There are no peat soil or soil categorised as problematic or fragile at all the visited estates. For e.g. at Makouke Estate, the major soil series were Kuala Brang 17.9%, Terap 20.6% and Pedu 17.0%.	Complied
4.3.2 A management strategy shall be in place for plantings on slopes above a certain limit (this needs to be soil and climate specific). -Minor compliance-	Slope areas which has more than 20° was excluded from being planted to avoid erosion following the recommendation from HCV assessment. The area with more than 20° slope is conserve as biodiversity area. For the areas which have slope below 20°, conservation terraces were constructed. During site visit, the cover crop has been established to avoid bare soil and eventually minimise the soil erosion. This practice is guided by OPG's APM, Chapter 6 (<i>Méthodes de Conservation des Sols et de L'eau</i>): Soil and Water Conservation Methods.	Complied
4.3.3 A road maintenance programme shall be in place. -Minor compliance-	Road maintenance program for FY 2019 was available for all the visited estates. Among the activities for the road maintenance are road grading, culvert installation and resurfacing. Based on road maintenance report, the progress to-date is in-line with the programme.	Complied

Criterion / Indicator		Assessment Findings	Compliance
4.3.4	Subsidence of peat soils shall be minimised and monitored. A documented water and ground cover management programme shall be in place. -Major compliance-	There is no peat soil or soil categorised as problematic or fragile soil at all the visited estates.	Complied
4.3.5	Drainability assessments shall be required prior to replanting on peat to determine the long-term viability of the necessary drainage for oil palm growing. -Minor compliance-	There is no peat soil or soil categorised as problematic or fragile soil at all the visited estates.	Complied
4.3.6	A management strategy shall be in place for other fragile and problem soils (e.g. sandy, low organic matter, acid sulphate soils). -Minor compliance-	There is no peat soil or soil categorised as problematic or fragile soil at all the visited estates.	Complied
Criterion 4.4 Practices maintain the quality and availability of surface and ground water			
4.4.1	An implemented water management plan shall be in place. -Major compliance-	<u>Makouke Plantation</u> Addressed in Water Management Plan (PLAN MKK/CRS_WMP/0219, dated 02/2019). The intention of the plan is to address various risks such as: <ul style="list-style-type: none"> • health hazard • siltation/sedimentation of rivers • pollution of water resources (surface & ground water) by household and scheduled wastes • pollution of water resources (surface & ground water) by fertilisers • pollution of water resources (surface & ground water) by pesticides • conflicts with communities • water wastage • overconsumption of water 	Complied

Criterion / Indicator	Assessment Findings	Compliance
	<p>Among the mitigation measures established and implemented were:</p> <ul style="list-style-type: none"> • Installation of WTP, monitor drinking water • Establishment of cover crop, silt pit, terraces, etc • Implementation of proper wastes management plan • Establishment of buffer zones • Monitor water quality levels in main rivers • SOP to maintain oil trap/separator • Regular testing of POME once the mill is in operation • Consider impacts on other users (downstream communities) prior to major extraction of river water i.e. field irrigation • Education to people living in the Company’s housing compound not to waste water <p>Apart from that , there are 10 sampling points around Makouke & Bindo estates for water quality. The analysis were done twice a year by government laboratory. The last analysis report was dated 5/3/2019 and among the parameters tested were pH, turbidity, NO3, PO4, SO4, Cl, BOD, COD and hydrocarbons.</p>	
<p>4.4.2</p>	<p>Protection of water courses and wetlands, including maintaining and restoring appropriate riparian and other buffer zones (refer to national best practice and national guidelines) shall be demonstrated -Major compliance-</p> <p>The following documented information was available:</p> <ul style="list-style-type: none"> - Water Management Plan for Awala Plantation dated June 2015 - Buffer zones updated in communication CRS/RSPOPGE_AWALA/0012017 dated 02 October 2017 <p>Among surface water protected are rivers and ponds. Width of the buffer zones is guided by Water</p>	<p>Complied</p>

Criterion / Indicator	Assessment Findings	Compliance
	<p>Management Plan for Awala Plantation- Olam Palm Gabon”:</p> <ul style="list-style-type: none"> - river 1 to 2m width – 10m buffer - river 2 to 5m width – 20m buffer - river 5 to 20m width – 50m buffer - river >20m width – 100m buffer <p>Based on site visit of the buffer zones visited at Makouke and Awala estates, the widths were consistent with the guideline.</p>	
<p>4.4.3</p>	<p>Appropriate treatment of mill effluent to required levels and regular monitoring of discharge quality, especially Biochemical Oxygen Demand (BOD), shall be in compliance with national regulations (Criteria 2.1 and 5.6). -Major compliance-</p>	<p>Effluent is treated through biological treatment. Final discharge pumped to a collection pond and distributed to trench system in the field (field no.: Lobe-242) as land application. The BOD value agreed between Awala and the government was 5,000 ppm. Awala POM analyses its final discharged effluent at frequency of twice a year. Verification of the results since the last assessment showed that the BOD level was below the agreed limit. All analysis were conducted by Laboratoire des Eaux.</p> <p>Complied</p>
<p>4.4.4</p>	<p>Mill water use per tonne of Fresh Fruit Bunches (FFB) (see Criterion 5.6) shall be monitored. -Minor compliance-</p>	<p>The water usage by the mill is monitored on daily basis since. As at todate, the average water consumption is 1.1 mt³ water/mt FFB [ref.: Monthly Water to FFB record].</p> <p>Complied</p>
<p>Criterion 4.5 Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management techniques. (IPM).</p>		
<p>4.5.1</p>	<p>Implementation of Integrated Pest Management (IPM) plans shall be monitored. -Major compliance-</p>	<p>Implementation of IPM is being monitored according the established guidelines under OLAM PALM GABON – Agriculture Policy Manual Volume 1 and Volume 2 dated April 2013 Environmental friendly approach to treat if there is any outbreak using Bacillus Thuringiensis (BT), Cordyceps Militaris for treatment of bagworms and nettle caterpillars is</p> <p>Complied</p>

		<p>recommended. Threshold level is defined in the Agriculture Policy Manual. Last option of control is through agrochemical use. The component of IPM includes early warning system, immediate control, and census prior and after control as part of evaluation. It was noted that beneficial plant such as <i>Antigonon leptopus</i> and <i>Turnera subulata</i> were planted along some of the field roads to host the predators. Major pest and disease at the moment are elephant and Ryncophorus exist at Mouila lot 1 and 3 Plantation. IPM monitoring summary as per below:</p> <p>Beneficial Plant establishment</p> <table border="1"> <thead> <tr> <th>Estate</th> <th>Plots/Length/Distance</th> <th>Remarks</th> </tr> </thead> <tbody> <tr> <td>Bindo</td> <td>18 plots</td> <td rowspan="4">1 plot= 2-3 meters The most species planted: <i>Turnera subulata</i></td> </tr> <tr> <td>Makouke</td> <td>18 plots</td> </tr> <tr> <td>Lobe</td> <td>36 plots</td> </tr> <tr> <td>Komo</td> <td>46 plots</td> </tr> </tbody> </table> <p>Pest and disease mitigation plan</p> <table border="1"> <thead> <tr> <th>Estate</th> <th>Major pest and disease</th> <th>Mitigation</th> </tr> </thead> <tbody> <tr> <td>Bindo and Makouke</td> <td>Rhynchophorus</td> <td>i) Used of Rhynchophorus trap in selected areas ii) Uprooting for phyto sanitation</td> </tr> <tr> <td>Makouke</td> <td>Elephant intrusion</td> <td>i) Construction of elephant trenches (47.7 km) ii) 50 units of sensor nodes and 8 km of barb wire installation</td> </tr> <tr> <td>Lobe & Komo</td> <td>Elephant intrusion</td> <td>i) Construction of elephant trenches (17.25 km)</td> </tr> </tbody> </table>	Estate	Plots/Length/Distance	Remarks	Bindo	18 plots	1 plot= 2-3 meters The most species planted: <i>Turnera subulata</i>	Makouke	18 plots	Lobe	36 plots	Komo	46 plots	Estate	Major pest and disease	Mitigation	Bindo and Makouke	Rhynchophorus	i) Used of Rhynchophorus trap in selected areas ii) Uprooting for phyto sanitation	Makouke	Elephant intrusion	i) Construction of elephant trenches (47.7 km) ii) 50 units of sensor nodes and 8 km of barb wire installation	Lobe & Komo	Elephant intrusion	i) Construction of elephant trenches (17.25 km)	
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Criterion / Indicator		Assessment Findings				Compliance
				ii) 12 units of sensor nodes and barb wire installation at 12 locations.		
		Bokoue	Elephant intrusion	Construction of elephant trenches (1.6 km)		
4.5.2	Training of those involved in IPM implementation shall be demonstrated. -Major compliance-	Training for those involve with IPM implementation has been effectively demonstrated. Training records for those involved on IPM implementation were available and verified during on-site assessment for Makaoke Concession and Awala estates. Sample of training records checked:				Complied
		Theme of Training	Date of training /venue	Trainer	Participant	
		IPM field practices (classroom)	5/5/19 (Makouke Concession Estate)	Agronomy team	CDQ, field assistant, agronomy technician	
		Practical field training on pest and disease	19/6/19 (Makouke Concession Estate)	Agronomy team	CDQ, field assistant, agronomy technician	
		IPM training (classroom and practical)	12/4/19 (Awala Plantation)	Agronomy team	CDQ, field assistant, agronomy technician	
Criterion 4.6 Pesticides are used in ways that do not endanger health or the environment						
4.6.1	Justification of all pesticides used shall be demonstrated. The use of selective products that are specific to the target pest, weed or disease and which	Justification of all pesticides used is available under Olam Palm Gabon, Agriculture Policy Manual Volume 1 and Volume 2 dated April 2013. The use of pesticide is specific to the target pest, weed and disease. Based on Olam Palm Gabon, Chapter 9: Immature Maintenance and Ablation; a				Complied

Criterion / Indicator		Assessment Findings	Compliance											
	<p>have minimal effect on non-target species shall be used where available. -Major compliance-</p>	<p>systemic type of chemical is recommended for circle spraying activities. As for pest and disease treatment, IPM Practices dated 25/11/17, entitled OPG Agriculture Circular no.3: Treatment and Management of <i>Rhynchophorus Phoenicis</i> is referred to.</p> <table border="1"> <tr> <td>Chemical (active ingredients)</td> <td>Target weeds</td> </tr> <tr> <td>Glyphosate IPA</td> <td>Circle with grass predominating</td> </tr> <tr> <td>Glyphosate IPA + Metsulfuron Methyl</td> <td>Circle with broadleaf weeds and grasses</td> </tr> <tr> <td>Triclopyr-2-butoxyethyl ester + surfactant (sticking agent)</td> <td>Woody growth</td> </tr> <tr> <td>Cypermethrin/Deltamethrin</td> <td><i>Rhynchophorus Phoenicis</i></td> </tr> </table>	Chemical (active ingredients)	Target weeds	Glyphosate IPA	Circle with grass predominating	Glyphosate IPA + Metsulfuron Methyl	Circle with broadleaf weeds and grasses	Triclopyr-2-butoxyethyl ester + surfactant (sticking agent)	Woody growth	Cypermethrin/Deltamethrin	<i>Rhynchophorus Phoenicis</i>		
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Glyphosate IPA + Metsulfuron Methyl	Circle with broadleaf weeds and grasses													
Triclopyr-2-butoxyethyl ester + surfactant (sticking agent)	Woody growth													
Cypermethrin/Deltamethrin	<i>Rhynchophorus Phoenicis</i>													
4.6.2	<p>Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per ha and number of applications) shall be provided. -Major compliance-</p>	<p>Records of pesticides and their active ingredients used, LD50, area treated, amount of a.i. applied per ha, and number of applications for 2019 (to date May 2019) was maintained. Summary of Ai/Ha as per below table:</p> <table border="1"> <thead> <tr> <th>Estate</th> <th>Active ingredient</th> <th>Ai per Ha</th> </tr> </thead> <tbody> <tr> <td rowspan="2">Makouke</td> <td>Glyphosate Isopropyl Ammonium</td> <td>0.23</td> </tr> <tr> <td>Triclopyr-2-butoxyethyl ester</td> <td>0.31</td> </tr> <tr> <td>Bindo</td> <td>Metsulfuron Methyl @ Ally</td> <td>0.02</td> </tr> </tbody> </table>	Estate	Active ingredient	Ai per Ha	Makouke	Glyphosate Isopropyl Ammonium	0.23	Triclopyr-2-butoxyethyl ester	0.31	Bindo	Metsulfuron Methyl @ Ally	0.02	Complied
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Criterion / Indicator		Assessment Findings			Compliance
			Glyphosate Isopropyl Ammonium	0.24	
			Triclopyr-2-butoxyethyl ester	0.05	
		Awala Plantation (Lobe, Bokoue and Komo Estate)	Metsulfuron Methyl @ Ally	0.01	
			Glyphosate Isopropyl Ammonium	0.06	
			Triclopyr-2-butoxyethyl ester	0.03	
			Starane 200 (fluroxypyr-meptyl)	0.04	
4.6.3	Any use of pesticides shall be minimised as part of a plan, and in accordance with Integrated Pest Management (IPM) plans. There shall be no prophylactic use of pesticides, except in specific situations identified in national Best Practice guidelines. -Major compliance-	The management has committed to minimise pesticide usage as per IPM plan. The use of biological control measures such as barn owls for rats control should be implemented if suitable and feasible. There is no prophylactic use of pesticides at all visited estates.			Complied
4.6.4	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, except in specific situations identified in national Best Practice guidelines. The use of such pesticides shall be minimised and eliminated as part of	Based on the chemical register and site observation at visited estates, there was no class IA, IB and II used in Makoake Consession and Awala Estate 1,2 & 3. Paraquat is totally banned by Olam. Refer to Olam Palm Gabon Manual, Chapter 9: Immature Maintenance and Ablation under clause 3.1.4.4; based on recommendation of the WHO Pesticide Action Network (PAN), WHO 1a, 1b and II should be banned or usage avoided			Complied

Criterion / Indicator	Assessment Findings	Compliance	
	<p>a plan, and shall only be used in exceptional circumstances. -Major compliance-</p>	<p>as much as possible. PAN dirty dozen and total 18 chemical i.e Paraquat, Parathion and Aldrin were banned totally by Olam. Verified at all visited estates, no chemical under WHO 1a, 1b and II used in the plantation.</p> <p>All chemical used by the estates granted with Authorization for Special Importation (Chemical) permits from Ministry of Agriculture. Sample of permit reviewed and checked:</p> <ul style="list-style-type: none"> i) Permit no. 003/MAEPG/DG-AGASA/DICSP/SPP/BSP dated 18/1/18 valid until 17/1/19 Chemical: Momento 20% WP @ Ally/Metsulfuron Methyl, Country of origin: Malaysia Chemical: DALOPIR 480 EC @ GARLON/ Triclopyr-2-butoxyethyl ester, Country of Origin: Malaysia ii) Permit no. 000338MAEPG/DG-AGASA/DOT/SPP/BSP dated 18/1/18 valid until 17/1/19 Chemical: Momento 20% WP @ Ally/Metsulfuron Methyl, Country of origin: Malaysia Chemical: DALOPIR 480 EC @ GARLON/ Triclopyr-2-butoxyethyl ester, Country of Origin: Malaysia 	

Criterion / Indicator	Assessment Findings	Compliance						
<p>4.6.5 Pesticides shall only be handled, used or applied by persons who have completed the necessary training and shall always be applied in accordance with the product label. Appropriate safety and application equipment shall be provided and used. All precautions attached to the products shall be properly observed, applied, and understood by workers (see Criterion 4.7). -Major compliance-</p>	<p>Pesticide operators given training on the safe handling and application of the pesticides. Suitable personal protective equipment and application equipment provided to the operators. Refer to SOP, Agrochemical Product Application, rev:4 dated 21/5/19 . Example of PPE provided for specific work units:</p> <table border="1" data-bbox="963 587 1742 1023"> <thead> <tr> <th data-bbox="963 587 1272 632">Activity/work unit</th> <th data-bbox="1272 587 1742 632">PPE recommendation</th> </tr> </thead> <tbody> <tr> <td data-bbox="963 632 1272 826">Spraying</td> <td data-bbox="1272 632 1742 826">Respirator with filter element (EN 14387:2004 +A1:2008) Rubber nitrile gloves Anti-Fog Chemical goggles Spraying suite (new coverall) Wellington boots</td> </tr> <tr> <td data-bbox="963 826 1272 1023">Manuring/fertilizer</td> <td data-bbox="1272 826 1742 1023">Dust mask (N95) @ CE0194 Rubber nitrile gloves Body Apron Wellington boots Jump suite Goggles/face shield</td> </tr> </tbody> </table> <p>All precautions attached to the products explained to operators and understood by them. This was also verified during site visit at Makaoko Concession and Awala Estate 1,2 & 3.</p>	Activity/work unit	PPE recommendation	Spraying	Respirator with filter element (EN 14387:2004 +A1:2008) Rubber nitrile gloves Anti-Fog Chemical goggles Spraying suite (new coverall) Wellington boots	Manuring/fertilizer	Dust mask (N95) @ CE0194 Rubber nitrile gloves Body Apron Wellington boots Jump suite Goggles/face shield	<p>Complied</p>
Activity/work unit	PPE recommendation							
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Manuring/fertilizer	Dust mask (N95) @ CE0194 Rubber nitrile gloves Body Apron Wellington boots Jump suite Goggles/face shield							
<p>4.6.6 Storage of all pesticides shall be according to recognised best practices. All pesticide containers shall be properly disposed of and not used for other purposes (see Criterion 5.3). -Major compliance-</p>	<p>Pesticides were kept in a locked store equipped with ventilation facility. Hazard signage was also put up to create awareness of safety aspects among visitors. The empty pesticides containers were triple rinsed and punctured and kept in a licensed store located at the landfill area (cross refer to 4.6.10).</p>	<p>Complied</p>						
<p>4.6.7 Application of pesticides shall be by proven methods that minimise risk and impacts.</p>	<p>The type and dosage of agrochemicals required for targeted weeds in different age profile are documented and justified in OLAM PALM GABON</p>	<p>Complied</p>						

Criterion / Indicator		Assessment Findings	Compliance
	-Minor compliance-	<p>– Agriculture Policy Manual Volume 1 and Volume 2 (French & English) dated April 2013. The implementation in the field is consistent with the established procedure. For weeding activities, knapsack spray pump is used for circle spraying.</p> <p>Full and semi-mechanized chemical spray has been introduced at Makaoke Consession estates. Area coverage is around 10 ha per semi-mechanized sprayer unit/tractor and 20 ha per unit tractor for fully mechanized sprayer.</p> <p>Total workforce requirement for semi-mechanized operation is 3; 2 sprayers, 1 driver and fully mechanized is 1 operator.</p>	
4.6.8	<p>Pesticides shall be applied aerially only where there is documented justification. Communities shall be informed of impending aerial pesticide applications with all relevant information within reasonable time prior to application.</p> <p>-Major compliance-</p>	No aerial spray at Makaoke Consession and Awala 1,2 and 3 estates.	Complied
4.6.9	<p>Maintenance of employee and associated smallholder knowledge and skills on pesticide handling shall be demonstrated, including provision of appropriate information materials (see Criterion 4.8).</p> <p>-Minor compliance-</p>	Employees that were interviewed (Store keeper and store assistant) have knowledge and skills on pesticide handling. There is no associated smallholders within Awala Plantation.	Complied
4.6.10	<p>Proper disposal of waste material, according to procedures that are fully understood by workers and managers shall be demonstrated (see Criterion 5.3).</p> <p>-Minor compliance-</p>	Empty chemical containers were either reused for containing pre-mixed herbicides or punctured and kept in the licensed storage at the landfill area. Due to the limitation of authorised vendors to take the chemical containers, storing is the only option available at the moment. Based on interview, the workers understood the restriction of using the chemical containers for other purposes	Complied

Criterion / Indicator	Assessment Findings	Compliance
<p>4.6.11 Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, shall be demonstrated. -Major compliance-</p>	<p>Annual medical surveillance for sprayers and pesticide operators were demonstrated (biological – once a year and clinical – twice a year). Medical examination programme established for sprayers which conducted by Estate Doctor and sent to Medical Science University, Faculty of Medical, Chemistry-Biochemistry Department for biological (range of cholinesterase, max 5,900 – 12,200 Ui/L for male and 4,700 – 10,400 Ui/L for female). Total of 61 sprayers was sent for medical surveillance programme in 23/3/19. All found to be fit to work without any detrimental of health.</p> <p>Sighted at visited estates, medical surveillance programme was not effectively demonstrated for;</p> <p><u>Makouke Estate</u> One (1) sprayer, employee no. 062212 was not included in the latest medical surveillance programme in March 2019.</p> <p><u>Lobe Estate</u> Three (3) sprayers under contractor "SEPROGRA" were not included in January and April medical surveillance programme.</p> <p>Thus, a major NC was issued.</p>	<p>Major nonconformance</p>
<p>4.6.12 No work with pesticides shall be undertaken by pregnant or breastfeeding women -Major compliance-</p>	<p>There were 4 females worked as sprayer at Bindo Estate. One of the sprayer, was tested positive based on UPT result on 14/5/19. Medical removal protection has been initiated and reassigned to other work unit.</p> <p>No pregnant or breast feeding women undertaking the work with pesticide. It was confirmed during interviews the female workers and they were all well aware. Interviews with female workers also confirmed knowledge of the policy of transfer to alternative duties if they wished to continue working when pregnancy was confirmed or breast-feeding.</p>	<p>Complied</p>

Criterion / Indicator	Assessment Findings	Compliance
Criterion 4.7 An occupational health and safety plan is documented effectively communicated and implemented.		
4.7.1	<p>The health and safety plan shall cover the following: A health and safety policy shall be in place. A health and safety plan covering all activities shall be documented and implemented, and its effectiveness monitored. -Major compliance-</p> <p>The management continued to implement health and safety policy, issue 2_WD5, document P-04 dated 1/4/16 which was signed by group MD and CEO of Olam International Limited. The ESH Manual, document ref: OPG-KNG-QSHEMAN01, rev: 01 approved on 3/3/14. Additional Road safety policy dated 4 July 2016 signed Country Head of Olam Palm Gabon was made available for verification.</p> <p>The ESH Improvement plan 2019 has been established for each operating units. Monitoring of plan is being monitored by ESH team on monthly basis. Among programme and improvement plan checked:</p> <p>Permit to work implementation Hot work permit, date issue: 21/6/19 location of work: store/workshop, under taking (permit acceptor) and permit issuer recorded in the permit. PPE requirement: harness/welding gloves/shield</p> <p>QHSE weekly inspection report Awala Plantation, 10-15/6/19. Checklist component for inspection as per the following:</p> <ul style="list-style-type: none"> i) Training & awareness ii) Safety (truck inspection, workers transport, seed monitoring and alcohol test) iii) Road maintenance iv) Environmental (waste collection, transfer and storage) 	<p>Complied</p>
4.7.2	<p>All operations where health and safety is an issue shall be risk assessed, and procedures and actions shall be documented and implemented to address the identified issues. All precautions attached to products shall be properly observed and applied to the workers. -Major compliance-</p> <p>The risk assessment was established as per Safety Risk management (S101.1, Issue 4, Date: 01/04/2016). The management was identified and registered the risk and summarized it in the Awala Palm Oil Mill Risk Assessment and Awala Plantation Risk Assessment. The risk assessment was last reviewed on 6/01/2019 by Safety Manager. The latest activity</p>	<p>Complied</p>

		<p>has been identified at Awala POM for contractor project (fuel moving grate).</p> <p>Review will be done if there is a change of activity/process or any incidents or at least 2 years once. Eg: FFB reception, Loading ramp, Pressing Station, Sterilisation Station, Laboratory, Store, Oil room, Nut plant, Boiler, Power House, Workshop, Cleaning, dispatching of CPO and PK etc.</p> <p>For plantations, Makouke and Awala Plantation risk assessment, date review 2/2/19. The coverage of risk assessment has include the following activities:</p> <ul style="list-style-type: none"> - Soil preparation/analysis - Planting of seedlings - Plantation operation - Transportation of workers - Construction - Mechanical workshop - Main office - Fuel/gas station - Chemical warehouse - Ferry crossing - Medical service - Environmental aspect <p>Precautions attached to products was observed based on the MSDS. Example of MSDS checked:</p> <table border="1" data-bbox="965 1203 1744 1367"> <thead> <tr> <th>Chemical/Material</th> <th>MSDS version</th> <th>Remarks</th> </tr> </thead> <tbody> <tr> <td>ESAB OK 48.0 welding electrode</td> <td>Version 8, 2017</td> <td rowspan="2">PPE requirement in line with OLAM PPE matrix</td> </tr> <tr> <td>Coated Stick Electrode (SMAW)</td> <td>Rev:10, April 2018</td> </tr> </tbody> </table>	Chemical/Material	MSDS version	Remarks	ESAB OK 48.0 welding electrode	Version 8, 2017	PPE requirement in line with OLAM PPE matrix	Coated Stick Electrode (SMAW)	Rev:10, April 2018	
Chemical/Material	MSDS version	Remarks									
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Coated Stick Electrode (SMAW)	Rev:10, April 2018										

Criterion / Indicator		Assessment Findings			Compliance
		Lubricant/engine oil (champion new energy 15W40)	Version:9, dated 11/12/2015	Accidental measures (inert, sand etc)	
		Starane 200 @ fluroxypr-meptyl	Version:5.2 dated 6/10/14	Class III chemical	
4.7.3	All workers involved in the operation shall be adequately trained in safe working practices (see Criterion 4.8). Adequate and appropriate protective equipment shall be available to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, and land preparation, harvesting and, if it is used, burning. -Major compliance-	<p>All workers involved in operation has been provided with adequate training in safe working practice as per program in the training plan. Sighted the training record as follows:</p> <ul style="list-style-type: none"> i. Safety training (safe ladder) dated 17/6/2019 ii. Noise training dated 17/6/2019 iii. Compressed gas training dated 19/1/2019 iv. Emergency Action Plan (Chemical/Oil) and fire accident training dated 8/4/19 v. Route/traffic training dated 18/2/2019 <p>The employee have been provided with Protective Equipment to cover all potential hazardous operations based on established SOP, OPG-MNG-EHS-SOP-13, rev:3 dated 14/2/19 entitled SOP for PPE management. PPE matrix has been developed for specific activities covering both estates and mill operation. PPE issuance records documented in PPE Records Book by workers to monitor the PPE usage and replenishment for each workers. Records dated 21/11/18 (workshop) and 25/5/19 (process) are referred to.</p>			Complied

Criterion / Indicator		Assessment Findings	Compliance								
4.7.4	The responsible person/persons shall be identified. There shall be records of regular meetings between the responsible person/s and workers. Concerns of all parties about health, safety and welfare shall be discussed at these meetings, and any issues raised shall be recorded. -Major compliance-	The responsible persons are the site Safety Manager and team. HSE meeting members consist of employer & employee representatives. The HSE Committee Organization Chart is available accordingly with adequate number of representatives from Awala Plantation as well as at Makouke Concession esttates. Records of regular meetings between the responsible person and workers were maintained. There was no major issue raised during the meeting. The frequency of the HSE meeting is every 3 months once. Checked meeting minutes at visited sites as per below: <table border="1" data-bbox="965 651 1744 818"> <thead> <tr> <th data-bbox="965 651 1227 683">Estate</th> <th data-bbox="1227 651 1485 683">Date of meeting</th> <th data-bbox="1485 651 1744 683">Remarks</th> </tr> </thead> <tbody> <tr> <td data-bbox="965 683 1227 751">Makouke Concession</td> <td data-bbox="1227 683 1485 751">1st: 23/1/19 2nd: 18/5/19</td> <td data-bbox="1485 683 1744 751" rowspan="2">Quarterly meeting</td> </tr> <tr> <td data-bbox="965 751 1227 818">Awala Plantation</td> <td data-bbox="1227 751 1485 818">2nd: 31/5/19 1st: 25/1/19</td> </tr> </tbody> </table>	Estate	Date of meeting	Remarks	Makouke Concession	1st: 23/1/19 2nd: 18/5/19	Quarterly meeting	Awala Plantation	2nd: 31/5/19 1st: 25/1/19	Complied
Estate	Date of meeting	Remarks									
Makouke Concession	1st: 23/1/19 2nd: 18/5/19	Quarterly meeting									
Awala Plantation	2nd: 31/5/19 1st: 25/1/19										

Criterion / Indicator	Assessment Findings	Compliance
<p>4.7.5</p>	<p>Accident and emergency procedures shall exist and instructions shall be clearly understood by all workers. Accident procedures shall be available in the appropriate language of the workforce. Assigned operatives trained in First Aid should be present in both field and other operations, and first aid equipment shall be available at worksites. Records of all accidents shall be kept and periodically reviewed. -Minor compliance-</p> <p>Emergency procedure is documented under SOP, Emergency Response for Hydrocarbon and Lubricant, document no. OPG-KNG-EHS-SOP-06, rev:4 dated 13/2/19. Latest emergency drill was done from 4-6 February 2019 for Awala Plantation. The exercise was done in collaboration with fire department.</p> <p>Trained first aider available at worksites. Verified certificate of competency for employee no. 035081 dated 19/2/19.</p> <p>Internal Operation Plan for Olam Palm Gabon (Rescue/Emergency Organization dated January 2019). Currently emergency drill was only done for Makouke Estate. No emergency drill conducted at Bindo Estate as to date. Spill kit for was not available at lubricant store (Bokuoe). At Lobe Estate, oral medication (ibuprofen and paracetamol) was found in the first aid box. Found a re-labelled alcohol bottle in the box without information of expiry date and hazard sign. Thus a minor NC was issued.</p>	<p>Minor nonconformance</p>

Criterion / Indicator	Assessment Findings	Compliance												
<p>4.7.6 All workers shall be provided with medical care, and covered by accident insurance. -Minor compliance-</p>	<p>All the workers are provided with medical care and are covered by accident insurance. Local workers were covered by CNSS @ <i>Caisse Nationale De Securite Sociale</i>. Sample of workers covered for Awala Plantation and Makouke Concession Estates as per below:</p> <table border="1" data-bbox="965 523 1798 951"> <thead> <tr> <th>Insurance/social security</th> <th>Employee & CNSS no.</th> <th>Estate</th> </tr> </thead> <tbody> <tr> <td>CNSS @ <i>Caisse Nationale De Securite Sociale</i>.</td> <td>062733 (001-1036948-5), 03445 (001-1047415-2),</td> <td>Bokoue</td> </tr> <tr> <td></td> <td>014796 (001-1137804-8), 016002 (010-1262426-6), 016022 (010-1160892-2)</td> <td>Lobe</td> </tr> <tr> <td></td> <td>034871 (001-1288884-4), 062212 (001-1081249-2), 055831 (010-1130643-3)</td> <td>Makouke Concession estates (Bindo & Makouke)</td> </tr> </tbody> </table>	Insurance/social security	Employee & CNSS no.	Estate	CNSS @ <i>Caisse Nationale De Securite Sociale</i> .	062733 (001-1036948-5), 03445 (001-1047415-2),	Bokoue		014796 (001-1137804-8), 016002 (010-1262426-6), 016022 (010-1160892-2)	Lobe		034871 (001-1288884-4), 062212 (001-1081249-2), 055831 (010-1130643-3)	Makouke Concession estates (Bindo & Makouke)	<p>Complied</p>
Insurance/social security	Employee & CNSS no.	Estate												
CNSS @ <i>Caisse Nationale De Securite Sociale</i> .	062733 (001-1036948-5), 03445 (001-1047415-2),	Bokoue												
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	034871 (001-1288884-4), 062212 (001-1081249-2), 055831 (010-1130643-3)	Makouke Concession estates (Bindo & Makouke)												
<p>4.7.7 Occupational injuries shall be recorded using Lost Time Accident (LTA) metrics -Minor compliance-</p>	<p>Records of incident and accident were available, using internal reporting system. Records on Lost Time Accident (LTA) metrics had been verified to be satisfactory.</p> <p>Accident statistic for 2018 and 2019 as shown below :</p> <table border="1" data-bbox="965 1150 1742 1362"> <thead> <tr> <th>Year</th> <th>Makouke Concession</th> <th>Awala POM</th> <th>Awala Estate 1,2 &3</th> </tr> </thead> <tbody> <tr> <td>2018</td> <td>128 cases (324 LTA)</td> <td>1 case (15 LTA)</td> <td>59 cases (593 LTA)</td> </tr> <tr> <td>To date May 2019</td> <td>25 cases (74 LTA)</td> <td>0 case</td> <td>51 cases (149 LTA)</td> </tr> </tbody> </table> <p>*LTA is equivalent to lost man days</p>	Year	Makouke Concession	Awala POM	Awala Estate 1,2 &3	2018	128 cases (324 LTA)	1 case (15 LTA)	59 cases (593 LTA)	To date May 2019	25 cases (74 LTA)	0 case	51 cases (149 LTA)	<p>Complied</p>
Year	Makouke Concession	Awala POM	Awala Estate 1,2 &3											
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Criterion / Indicator	Assessment Findings	Compliance	
Criterion 4.8 All staff, workers, smallholders and contract workers are appropriately trained.			
4.8.1	A formal training programme shall be in place that covers all aspects of the RSPO Principles and Criteria, and that includes regular assessments of training needs and documentation of the programme. -Major compliance-	Training programme for 2019 has been established by the Training Assistant Manager (Landry) which covered various main topics in particular safety, environment (including HCV and RTE), social, mill and estate best practices, supply chain.	Complied
4.8.2	Records of training for each employee shall be maintained. -Minor compliance-	Training records were available for verification [form no.: M-GSI.02, 1/4/2016] sighted: Makouke Complex: <ul style="list-style-type: none"> • Introduction to RSPO P&C, 28, 29 & 31/5/2019, attended by 44 workers & CDQ in total • Protection of endangered species in Gabon, in May 2019 at muster ground (for both Bindo & Makouke) • Harvesting standard and canopy management, 28, 27, 25/5/2019, attended by 78 harvesters • IPM field training – 8, 10 & 19/5/2019 – attended 42 employees Awala Complex: <ul style="list-style-type: none"> • Protection of endangered species in Gabon, on 9/5/2019 (Komo), 12/4/2019 May 2019 (Bokoue) and 11/4/2019 (Lobe) • Sexual harassment in workplace, 18/4 to 3/5/2019 at all the three estates including the staff 	Minor nonconformance

Criterion / Indicator	Assessment Findings	Compliance
	<ul style="list-style-type: none"> • Spraying techniques & safety procedures, conducted between 9/2 to 8/4/2019 (for Lobe and Bokoue estates) • NPK application/Safety induction/Manuring techniques, 26/2 & 23/4/2019 (Komo), 27/4 & 29/4/2019 (Lobe) <p>However, there was no evidence that training has been given to the employees of a contractor. There was no training records available for employees of a contractor (DGNS) that has been appointed to carry out harvesting & evacuation operation at Komo Estate. Thus, a non-conformity report was assigned due to this lapse.</p>	
<p>Principle 5: ENVIRONMENTAL RESPONSIBILITY AND CONSERVATION OF NATURAL RESOURCES AND BIODIVERSITY</p>		
<p>Criterion 5.1 Aspects of plantation and mill management, including replanting, that have environmental impacts are identified, and plans to mitigate the negative impacts and promote the positive ones are made, implemented and monitored, to demonstrate continual improvement.</p>		

Criterion / Indicator		Assessment Findings	Compliance
5.1.1	An environmental impact assessment (EIA) shall be documented. -Major compliance-	All the environmental aspects and impacts have been identified through an EIA conducted by Terre Environnement Aménagement in Nov 2010 to May 2011. Among the activities assessed were: <ul style="list-style-type: none"> • Land preparation • Roads construction • Nursery • Field upkeep • Harvesting • Infrastructure construction • Bio-diversity protection plan • Fertiliser application • Phytosanitary management plan • Water quality follow up plan • Wastes management plan • Greenhouse gasses management plan • Hydrocarbon management plan • Emergency plan – fire breakout 	Complied
5.1.2	Where the identification of impacts requires changes in current practices, in order to mitigate negative effects, a timetable for change shall be developed and implemented within a comprehensive management plan. The management plan shall identify the responsible person/persons. -Minor compliance-	There was no change of current practices required to mitigate negative effects based on identified impacts for both the mill and estates. In POM, management plan of the environmental and social which prepared by Terre Environmental Development on June 2014 has identified different aspect, impacts and mitigation measures for different activities. It was last updated in May 2019. The summary of the management plan has the information about location, source of impact, potential impact, mitigation measures, when to implement, frequency, monitoring records PIC. E.g. <ul style="list-style-type: none"> • Generation of pollutants from the EFB stockyard has been identified which established mitigation measure was to construct cover/roofing 	Complied

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Criterion / Indicator	Assessment Findings	Compliance
	<p>at the stockyard. Nonetheless, there is no necessity due to the EFB is sent to the estates for mulching.</p> <p>For estates, social and management plan which updated from time to time has incorporated source of impact, impact, mitigation measures, indicator, responsible personal and completion date.</p>	
<p>5.1.3</p>	<p>This plan shall incorporate a monitoring protocol, adaptive to operational changes, which shall be implemented to monitor the effectiveness of the mitigation measures. The plan shall be reviewed as a minimum every two years to reflect the results of monitoring and where there are operational changes that may have positive and negative environmental impacts.</p> <p>-Minor compliance-</p> <p>A prescription by Department of General Direction of Environment and Protection (DGEPN) listed all the monitoring, reporting and analysis requirements for the activities in the mill and estates. A summary report which cover monitoring of surface water, air, soil, health & security and employment which need to submit to DGEPN. Sighted during onsite visit.</p> <p>For example:</p> <ul style="list-style-type: none"> • Chimney emission of boiler monitoring report documented on daily basis in "Boiler House Logsheet". Based on records between 17-21/6/2019, the emission were all below 40%. • Three latest effluent analysis reports dated 27/5/2019, 10/9/2018 and 5/6/2018 by a government laboratory. The analysis conducted twice a year. <p>For Awala's estate, similar report which cover extra criteria for local communities, biodiversity and waste submitted on March 2019.</p>	<p>Complied</p>
<p>Criterion 5.2</p> <p>The status of rare, threatened or endangered species and other High Conservation Value habitats, if any, that exist in the plantation or that could be affected by plantation or mill management, shall be identified and operations managed to best ensure that they are maintained and/or enhanced.</p>		

Criterion / Indicator	Assessment Findings	Compliance
<p>5.2.1</p>	<p>Information shall be collated in a High Conservation Value (HCV) assessment that includes both the planted area itself and relevant wider landscape-level considerations (such as wildlife corridors). -Major compliance-</p>	<p>Makouke Estate: HCV assessment have been conducted in December 2018 by a team of 9 assessors with various field and expertise. The report was finalised in 23/6/2019. The methodology includes the activities such as desktop assessment, communities consultations and participatory mapping, consultation of other keys stakeholders, biodiversity (flora & fauna) survey and physical environment survey (ecosystem activities).</p> <p>Complied</p>
<p>5.2.2</p>	<p>Where rare, threatened or endangered (RTE) species, HCVs, or legally protected species or areas are present or are affected by plantation or mill operations, appropriate measures that are expected to maintain and/or enhance them shall be implemented through a management plan. -Major compliance-</p>	<p>Makouke Estate: RTE identified are Chimpanzee (<i>Pan troglodytes troglodytes</i>), Gorilla (<i>Gorilla gorilla</i>) and Mandrill (<i>Mandrillus sphinx</i>). Oil Palm Gabon (OPG) has developed the specific "Biodiversity Action Plan" (ref.: Item 6.1, HCV assessment for Makouke and Bindo concession (OPG), June 2019) to maintain and/or enhance the RTE. A consultant, recommended by the International Finance Corporation (IFC) was hired to develop this plan based on their visit in March & April 2018. Nonetheless, Makouke has established the general HCV management and monitoring plan which includes the activities like regular monitoring by HCV team and sensitization of community and other stakeholders with regards to HCV.</p> <p>Complied</p>
<p>5.2.3</p>	<p>There shall be a programme to regularly educate the workforce about the status of these RTE, HCV or protected species and habitats, and appropriate disciplinary measures shall be instigated in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect or kill these species.</p>	<p>Training related to HCV was conducted accordingly to educate the workforce. Sighted the training record as follows:</p> <ul style="list-style-type: none"> Protection of endangered species in Gabon, in May 2019 at muster ground (for both Bindo & Makouke) <p>Protection of endangered species in Gabon, on 9/5/2019 (Komo), 12/4/2019 May 2019 (Bokoue) and 11/4/2019 (Lobe)</p> <p>Complied</p>

Criterion / Indicator	Assessment Findings	Compliance
	-Minor compliance-	
5.2.4 Where a management plan has been created there shall be ongoing monitoring: <ul style="list-style-type: none"> • The status of HCV, RTE and protected species and areas that are affected by plantation or mill operations shall be documented and reported; • Outcomes of monitoring shall be fed back into the management plan. -Minor compliance-	Various management program has been established for the identified HCV area. The management organized the patrol monitoring together with ANPN to all the HCV area. Report generate for each patrolling recording observation onsite, such as animal trap, illegal logging, illegal hunting observed. For e.g. at Makouke, while waiting for the specific management plan to be finalised based on assessment mentioned in I5.2.1, the management has initiated weekly monitoring on HCV and elephant presence. HCV weekly monitoring report, which has the information about activities, field no., observations results, responsible persons. The latest report is dated 14-20/6/2019.	Complied
5.2.5 Where HCV set-asides with existing rights of local communities have been identified, there shall be evidence of a negotiated agreement that optimally safeguards both the HCVs and these rights. -Minor compliance-	A total of 11,045 ha which identified as the HCV 5 under HCV Northern area of Komo estate for the local communities for their activities such as hunting, fruit harvesting and fishing. Interviewed the villagers and they were authorized with the badges for hunting activities in the HCV areas. The permit stated the rules & regulation, signature of the communities chief and Olam stamp. The villager also satisfied with the control as it restricts unauthorised persons to access the area.	Complied
Criterion 5.3: Waste is reduced, recycled, re-used and disposed in an environmentally and socially responsible manner.		
5.3.1 All waste products and sources of pollution shall be identified and documented. -Major compliance-	In Awala POM, the list of activities, types of waste, location, elimination relating to operations are documented. The activities such as maintenance, office, boiler room and treatment plant. The waste	Complied

		<p>identification updated in May 2019 The pollution sources are provided in the Waste Management Improvement Plan.</p> <p>List of wastes at estates was last updated from time to time. Among the information available in the list was station, type of wastes, sources of wastes, current mode of handling and new mode of handling/action to be taken.</p> <p>e.g.</p> <p>Station: Housing Type of wastes: waste water Sources of wastes: septic tank Current mode of handling: collected by GPS (Gabon Proper Service)</p> <p>Station: Maintenance workshop Type of wastes: spent oil Sources of wastes: machinery Current mode of handling: collected, stored & collected by authorised vendor (e.g. TTRB Services)</p> <p>Station: Clinic Type of wastes: needles, blades, single used materials Current mode of handling: sent to nearest hospital i.e. in this Kango Hospital – recorded in log book (acknowledged by hospital personnel)</p>	
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Criterion / Indicator	Assessment Findings	Compliance
	<p>Other stations included in the list were groceries, service station (fuel station) – assessment combined with workshop, office and computers.</p>	
<p>5.3.2</p> <p>All chemicals and their containers shall be disposed of responsibly. -Major compliance-</p>	<p>For both estates and mill, the empty containers from agrochemicals, lubricants, boilers chemical, water treatment plant were kept in a wastes store near the government permitted landfill [0°1'4"N 10°12'40"E]. The quantity of the empty containers was recorded in the "Olam Landfill Waste Register Template". The records have the information about date of delivery, transporter's identity and quantity of containers in pieces. So far there is no authorised collector to dispose the empty chemical containers. Waste register list out the waste, quantity, area and person in charge. When the quantity of the ECC is enough, they will be sent to sister company (at Mouila) to be shredded for size reduction and stored. However, this has yet to be started since the shredder is still under repair.</p> <p>The spent lubricants generated from the maintenance of machinery operation are kept in a skid tank. It will then be collected by a vendor for disposal. For example, for Awala complex, the last disposal was on 26/5/2018 by Les Acieries du Gabon [ref.: consignment note #44] for a quantity of 13,000 lt.</p>	<p>Complied</p>
<p>5.3.3</p> <p>A waste management and disposal plan to avoid or reduce pollution shall be documented and implemented. -Minor compliance-</p>	<p>Waste Management Plan (MOI-DS-02) dated 01 Feb 2016 had identified the source of the waste & pollution and management plan.</p> <p>The domestic wastes were sent to a landfill located in the estate which had been approved by the DGEPN (dated 11/7/2017; No: 1421/MEFPEPGSE/SG/DGEPN, Licensee: OLAM Palm Gabon, Awala). Included in the license was also the setup of recyclable and toxic wastes storage.</p> <p>At Makouke, the appropriate landfill which was approved by the DGEPN is expected to be in operation in 2 month time. At the moment, a temporary landfill which has been established by the previous Company is used. A management plan has been developed incorporated with the SEIA of</p>	<p>Complied</p>

Criterion / Indicator		Assessment Findings	Compliance
		landfill establishment report (a prerequisite to obtain the landfill permit). The management plan has the information about type of impact (e.g. lack of knowledge on refuse disposal), mitigation measure (e.g. education and awareness campaign) and method of monitoring (e.g. training records, number of campaigns, etc.)	
Criterion 5.4: Efficiency of fossil fuel use and the use of renewable energy is optimized.			
5.4.1	A plan for improving efficiency of the use of fossil fuels and to optimise renewable energy shall be in place and monitored. -Minor compliance-	The POM generates electricity from genset using diesel. The energy generated from Awala Mill will powers the mill operations, offices within the mill vicinity and workshop. The monthly diesel and fibre utilization are being monitored and recorded. For example for 2018 the consumption was 1.15 lt/mt FFB.	Complied
Criterion 5.5: Use of fire for preparing land or replanting is avoided, except in specific situations as identified in the ASEAN guidelines or other regional best practice.			
5.5.1	There shall be no land preparation by burning, other than in specific situations as identified in the 'Guidelines for the Implementation of the ASEAN Policy on Zero Burning' 2003, or comparable guidelines in other regions. -Major compliance-	No burning method is practiced in the visited estates.	Complied
5.5.2	Where fire has been used for preparing land for replanting, there shall be evidence of prior approval of the controlled burning as specified in 'Guidelines for the Implementation of the ASEAN Policy on Zero Burning' 2003, or comparable guidelines in other regions -Minor compliance-	NA – no used of fire for land preparation.	Complied
Criterion 5.6: Plans to reduce pollution and emissions, including greenhouse gases, are developed, implemented and monitored.			

Criterion / Indicator		Assessment Findings	Compliance
5.6.1	An assessment of all polluting activities shall be conducted, including gaseous emissions, particulate/soot emissions and effluent (see Criterion 4.4) -Major compliance-	Based on the assessment of all polluting activities as of the Environment Aspect and Impact assessment, various emission and effluent monitoring as below: <ul style="list-style-type: none"> • Effluent BOD (final discharge) was done by Laboratoire Des Roches Et Des Eaux and the results showed that the discharge quality was within the agreed limit. • Monitoring of the GHG quantity was done through RSPO PalmGHG Calculator Version 3.0.1. 	Complied
5.6.2	Significant pollutants and greenhouse gas (GHG) emissions shall be identified, and plans to reduce or minimise them implemented. -Major compliance-	For the estate, GHG emissions identified including CO _x , SO _x and NO _x from various sources including fossil fuel, chemical, sinks, crop sequestration, fertilizer consumptions and sequestration in conservation area. For mill, GHG emission identified from POME, fuel consumption and grid electricity utilization. Emission recorded based on RSPO GHG calculator ver 3.0.1, OPG achieved net sequestration through conservation set aside.	Complied
5.6.3	A monitoring system shall be in place, with regular reporting on progress for these significant pollutants and emissions from estate and mill operations, using appropriate tools. -Minor compliance-	Monitoring of the GHG quantity was done through RSPO PalmGHG Calculator Version 3.0.1. The GHG calculation was done as per certification unit basis which consists of 5 estates and 1 mill. The summary of emissions can be seen in Appendix C of this report. Verification of the raw data against what has been reported in RSPO GHG calculator showed that the input data were consistent.	Complied
Principle 6: RESPONSIBLE CONSIDERATION OF EMPLOYEES AND OF INDIVIDUALS AND COMMUNITIES AFFECTED BY GROWERS AND MILLERS			
Criterion 6.1: Aspects of plantation and mill management that have social impacts, including replanting, are identified in a participatory way and plans to mitigate the negative impacts and promote the positive ones are made, implemented and monitored, to demonstrate continual improvement.			

Criterion / Indicator		Assessment Findings	Compliance
6.1.1	A social impact assessment (SIA) including records of meetings shall be documented. -Major compliance-	The SIA for Makouke Estate and Bindo-Benin Estate is covered in the SEIA report conducted for extension of the Bindo-Bifoun. The assessment has been conducted with participatory of the local community, local NGOs and local authority during the period of October 2017 – May 2018. The records of meetings and attendance list is made available at annexes of the report dated July 2018.	Complied
6.1.2	There shall be evidence that the assessment has been done with the participation of affected parties. -Major compliance-	The records of meetings and attendance list for Makouke Estate and Bindo-Benin Estate SIA is made available at annexes of the report dated July 2018.	Complied
6.1.3	Plans for avoidance or mitigation of negative impacts and promotion of the positive ones, and monitoring of impacts identified, shall be developed in consultation with the affected parties, documented and timetabled, including responsibilities for implementation. -Major compliance-	The management plan for Makouke Estate and Bindo-Benin Estate has been established as part of the SEIA that was conducted during the period of October 2017 – May 2018. The management plan includes promotion of positive impacts and mitigation of negative impacts. Appropriate timeline and responsible person in carrying out the management plan has been established.	Complied
6.1.4	The plans shall be reviewed as a minimum once every two years and updated as necessary, in those cases where the review has concluded that changes should be made to current practices. There shall be evidence that the review includes the participation of affected parties. -Minor compliance-	The management plan for Makouke Estate and Bindo-Benin Estate has been established in July 2018. Makouke Estate and Bindo-Benin Estate is extension of scope assessment, hence the review of the plan will be reviewed in next assessment. The management plans for Awala site (including both Estates and Mill) were reviewed on 23/05/2019. No changes were required on the management plan. The management plan identified in the SIA is continuous implementation. However the social contract implementation was reviewed and new timeline has been identified for those outstanding implementation.	Complied

Criterion / Indicator		Assessment Findings	Compliance
6.1.5	Particular attention shall be paid to the impacts of smallholder schemes (where the plantation includes such a scheme). -Minor compliance-	There is no scheme smallholders associated with this certification.	Not applicable
Criterion 6.2 There are open and transparent methods for communication and consultation between growers and/or millers, local Communities and other affected or interested parties.			
6.2.1	Consultation and communication procedures shall be documented -Major compliance-	<p>The <i>Procedure de Consultation ET de Communication Avec Les Communautés Locales</i> (Procedure for Consultation and Communication with the Local Communities) SOP No.001: CR&S Mkk 2018 v1 has been established.</p> <p>This procedures has been communicated to the local community of Makouke Estate and Bindo-Benin Estate. This is evident from interviewing the local communities that they have received this procedure and the procedure has been retained by the head of village.</p> <p>On a quarterly basis the OPG social team will have stakeholder consultation with the communities.</p>	Complied
6.2.2	A management official responsible for these issues shall be nominated. -Minor compliance-	The responsible personnel for managing communication with the stakeholders is Corporate Responsibility and Sustainability Manager. For Makouke is Ms. Nina while for Awala is Mr. Josh.	Complied

Criterion / Indicator		Assessment Findings	Compliance
6.2.3	A list of stakeholders, records of all communication, including confirmation of receipt and that efforts are made to ensure understanding by affected parties, and records of actions taken in response to input from stakeholders, shall be maintained -Minor compliance-	The latest stakeholder list for both Awala and Makouke site were updated in April 2019. The list of stakeholders includes contractors, representative from the village, NGOs and government authorities. Communicate records including meeting minutes and attendance list are retained. Samples reviewed: 1. Communication regarding revised FPIC with the community on 18/04/2019. 2. Communication regarding revised FPIC with the authority on 11/04/2019. 3. Meeting minute with Makouke Village regarding land expansion for community use dated 11/10/2018. 4. Acceptance records of the Procedure of Dispute and Litigation.	Complied
Criterion 6.3 There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all affected parties.			
6.3.1	The system, open to all affected parties, shall resolve disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants and whistleblowers, where requested. -Major compliance-	OPG has developed <i>Procedure De Gestion Des Plaintes Et Reclamations</i> (Procedure for Complaint Handling and Claims) Doc. No. SOP No 07/CRS-GPS(5)/0618, Rev. No. 05 dated 05/03/2019. The procedure has detailing the process of dealing with the complaints from communities and other stakeholders such as customers and suppliers. Method to lodge complain has also clearly described in the procedure.	Complied
6.3.2	Documentation of both the process by which a dispute was resolved and the outcome shall be available. -Major compliance-	The SocProg (Olam Grievance Portal) retained all external grievance. Details of the grievance and resolution are available in SocProg. There was no formal grievance reported at Awala site since last assessment. At Awala site, records of the internal grievances before 2019 are not available. The reason of the records were not available was due to the previous HR manager has left without proper hand over. There is a failure in the system where such documents and records cannot be retrieve when required.	Major nonconformance

Criterion / Indicator		Assessment Findings	Compliance
		The grievance records at Awala site was reviewed. The records are recorded in the "Plaintes Des Salaries". However there were no records on when the grievances was resolved and if the resolution is acceptable by the complainant.	
Criterion 6.4 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.			
6.4.1	A procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, shall be in place. -Major compliance-	The following procedures has been established at Makouke: 1. <i>Procédure d'identification des droits legaux et coutumiers</i> (Procedure for identification legal rights and customary) SOP No 002:CR&S Mkk 2018 dated May 2018. 2. <i>Procédure d'identification des personnes ayant droit une indemnisation et/or compensation autour de a la plantation d'Olam Palm Makouke</i> (Procedure for identification people entitle of compensation) SOP No 004:CR&S Mkk 2019 dated April 2019. 3. <i>Procédure de negociation avec les communautes locales;</i> (Procedure for negotiation with local communities) SOP No 006:CR&S Mkk 2019 dated April 2019 Communication of the procedures and evidence of the community has accepted the procedures is available.	Complied
6.4.2	A procedure for calculating and distributing fair compensation (monetary or otherwise) shall be established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation. This procedure shall take into account: gender differences in the power to claim rights, ownership and access to land; differences of transmigrants and long-established communities; and differences in ethnic groups' proof of legal versus communal ownership of land.	The procedures for compensation is as stated in 6.4.1. The procedures emphasized on participatory and community representation include male, female and youth). During the local community engagement, it was observed that the village leaders include female.	Complied

Criterion / Indicator		Assessment Findings	Compliance
	-Minor compliance-		
6.4.3	The process and outcome of any negotiated agreements and compensation claims shall be documented, with evidence of the participation of affected parties, and made publicly available -Major compliance-	The SocProg (Olam Grievance Portal) was reviewed and the last compensation compensated in Awala was a complained received on 04/12/2017 related to crop destruction during land preparation. There was no any form of land compensation at Makouke Estate and Bindo-Benin Estate.	Complied
Criterion 6.5 Pay and conditions for employees and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages.			
6.5.1	Documentation of pay and conditions shall be available. -Major compliance-	There is no salary slip issued to the Indonesia Foreign Workers (including non-operational workers e.g. cook/maid). Furthermore there were no P&C of the worker on how much they received as it has been exposed to other workers. This is observed through the salary receiving form for 21/04/2019-20/05/2019. Thus,a major non-conformity was raised	Major nonconformance
6.5.2	Labour laws, union agreements or direct contracts of employment detailing payments and conditions of employment (e.g. working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc.) shall be available in the languages understood by the workers or explained carefully to them by a management official. -Major compliance-	<p>The work contracts of OPG-Awala workers have clearly reference to the Collective agreement and the Code of Employment of Gabon. Total of 11 temporary and 22 permanent workers contracts were verified.</p> <p>Sample of 5 workers' salary slip from Makouke site for period of March 2019 and 19 workers' salary slip from Awala Site (both estates operations and mill operations) for period of December 2018 and March 2019 were reviewed to confirm the pay is as per the minimum wage of Gabon. The workers are paid on hourly rate and if they are able to achieve their target (e.g. harvester able to harvest more than 135 bunches a day) premium will be paid according to the Collective agreement.</p> <p>According to the Decree No599/PR of the Code of Social Security, a company is required to register its worker to Caisse Nationale de Securite Sociale (CNSS) 8 days after its employment. However for contract workers under ETS Ndza Magange Traveaux ET Services, 15 samples was</p>	Major nonconformance

Criterion / Indicator	Assessment Findings	Compliance
	<p>reviewed and no CNSS was registered and hence CNSS was not paid for the 15 samples. The employment was mainly in April and May 2019. Review of the Contractors' workers (Nadza Magange Travaux ET Services; Service De Proximite Du Gabon; Les Jardins D'Olivier and Bance Espace Vert) employment contracts found that the contract does not include conditions such as holiday and holiday payment; terms of resignation (for Service De Proximite Du Gabon); payment of CNSS (for Service De Proximite Du Gabon); terms of resignation (for Service De Proximite Du Gabon) and maternity holiday.</p> <p>According to Article 6 of the worker contract of ETS Ndza Magange Travaux ET Services, when the targets are not achieved, there is a possibility 40% penalty of the salary or no salary will be paid. This is a form of forcing the labor to work in order to get their salary.</p> <p>Thus,a major non-conformity was raised</p> <p>OFI: Indonesian worker at Makouke site found to have no valid Carte de Sejour (CDS). The application of the CDS was valid until 30/03/2019. The company shall continue to follow up with the immigration department to ensure the CDS is being issued.</p>	
<p>6.5.3</p>	<p>Growers and millers shall provide adequate housing, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. -Minor compliance-</p>	<p>Complied</p>

Criterion / Indicator		Assessment Findings	Compliance
		<p>Medical facility is available in both Makouke and Awala site. Medication are deemed sufficient.</p> <p>Other amenities such as school (in construction); church; sport field; water and electricity are provided. The workers are not required to pay for water and electricity. Water are provided on rationing basis (at Awala Site) for controlling usage. However, water pump is available at housing facilities for any additional use.</p> <p>OFI: The sanitization of the Makouke site housing facilities could be improved.</p>	
6.5.4	<p>Growers and millers shall make demonstrable efforts to monitor and improve workers' access to adequate, sufficient and affordable food.</p> <p>-Minor compliance-</p>	<p>In order to ensure workers have accessible to affordable food, grocery stalls has been established at the housing compound. Contract of the grocery stall at Awala site was reviewed to confirm that the pricing of the materials shall not be more than the pricing of the nearest town (Kango). Additionally land is allocated for crop planting.</p> <p>At Makouke site, workers have access to local markets and local community grocery stores. Interview conducted at Makouke site confirmed that the food is still affordable.</p>	Complied
<p>Criterion 6.6 The employer 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>			
6.6.1	<p>A published statement in local languages recognising freedom of association shall be available.</p> <p>-Major compliance-</p>	<p>Human Rights Policy was developed where the company does not interfere the employees' rights to form and join any unions or other associations of their own choosing and to bargain collectively. The policy has been briefed to all the workers during their induction and the policy was displayed in the notice board at the vicinity of the operating units.</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance
6.6.2	Minutes of meetings with main trade unions or workers' representatives shall be documented. -Minor compliance-	OPG Management team will have a monthly meeting with the worker's union. For Makouke site the 2019 meeting schedule has been established to held on the 4 th Saturday of the month (sometime 3 rd Saturday of the month) while for Awala Mill the 2019 meeting schedule has been established to held on the 4 th Monday of the month. The minutes of the meeting are maintained by the HR personnel at Makouke and the minutes are shared to the management for actions. Sample of the email communicated on 22/04/2019 to the Makouke site management was sighted. The sample meeting minute for Awala Mill dated 10/03/2019 was reviewed. OFI: The sharing of the meeting minutes was not consistently send to the top management at Awala site. The practice shall be consistent within the sites. Retaining of workers' representative meeting records especially at Awala Site could be improved.	Complied
Criterion 6.7 Children are not employed or exploited.			
6.7.1	There shall be documentary evidence that minimum age requirements are met. -Major compliance-	Olam Palm Gabon has implemented Human Rights Policy where they do not engage in or benefit from the use of child labour as defined by ILO standards and national laws. Through document review of the master list of employees with date of birth confirmed that the company only employed workers who are above 18 years old. The list of workers for both Awala and Makouke site was review. The youngest employee was born on 10/06/2000 and 25/12/1998 respectively.	Complied
Criterion 6.8			
6.8.1	A publicly available equal opportunities policy including identification of relevant/affected groups in the local environment shall be documented.	Human Rights Policy was implemented in Olam Palm Gabon where they provide an environment that free from discrimination and they make commitment to tolerate no kind of discrimination on account of sex, age	Complied

Criterion / Indicator		Assessment Findings	Compliance
	-Major compliance-	<p>or religion and their employees make a commitment to give everyone same opportunities of success and evolution.</p> <p>The policy has been briefed to all the workers during their induction and the policy is displayed in the notice board at the vicinity of the operating units.</p>	
6.8.2	<p>Evidence shall be provided that employees and groups including local communities, women, and migrant workers have not been discriminated against.</p> <p>-Major compliance-</p>	<p>There is no form of discrimination when hiring especially related to health. Samples of the medical certificates were reviewed at Makouke site. The information provided by the doctor to the HR is a note to notify if the candidate is fit or unfit. There is no records of examination details. OPG is giving priority to employ workers from the surrounding village.</p>	Complied
6.8.3	<p>It shall be demonstrated that recruitment selection, hiring and promotion are based on skills, capabilities, qualities, and medical fitness necessary for the jobs available.</p> <p>-Minor compliance-</p>	<p>OPG has established the <i>Procédure d'embauche prioritaire aux population riveraines a la plantation d'Olam Palm Makouke</i> (Procedure of hiring local community) dated 08/11/2017. This procedure is a general procedure to hire workers. The procedure has documented the step by step approach to hire – including posting of position, medical fitness examination, contracting and induction on company policy, safety requirements and employment regulations.</p>	Complied
<p>Criterion 6.9 There is no harassment or abuse in the work place, and reproductive rights are protected.</p>			
6.9.1	<p>A policy to prevent sexual and all other forms of harassment and violence shall be implemented and communicated to all levels of the workforce.</p> <p>-Major compliance-</p>	<p>OPG has established Human Rights Policy where the company provides the environment that free from discrimination and harassment or abuse in the work place as well as the reproductive rights are protected. The policy was briefed to all the workers during their induction. The policy is displayed in the notice board of the operating units vicinity. Gender committee was established. For Awala site, the Gender Committee leader is Ms Milebe Gyslaine. Training program on sexual harassment and discrimination was conducted in April 2019 at Bokoue, Lobe, Komo estate respectively.</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance
		The gender committee will carry program to enhance women awareness and knowledge. For 2019, the program will be family planning. Female workers and Gender Committee Leader was interviewed that there was no form of harassment.	
6.9.2	A policy to protect the reproductive rights of all, especially of women, shall be implemented and communicated to all levels of the workforce. -Major compliance-	The policy to protect the reproductive rights is established was part of Human Rights Policy. Records from the clinic shows that there are maternity records. This proves that the company has not restricted workers' rights of reproduction.	Complied
6.9.3	A specific grievance mechanism which respects anonymity and protects complainants where requested shall be established, implemented, and communicated to all levels of the workforce -Minor compliance-	A specific grievance procedures has been established <i>Procédure de lute contre harcèlement sexuel et la discrimination en milieu professionnel</i> (Procedure Against Sexual Harassment and discrimination at workplace) dated 11/06/2019 to manage sexual complaints. There was no reported sexual related grievance since last audit.	Complied
Criterion 6.10 Growers and millers deal fairly and transparently with smallholders and other local businesses.			
6.10.1	Current and past prices paid for Fresh Fruit Bunches (FFB) shall be publicly available. -Minor compliance-	The price made publically available at the weighbridge was a price 3 months ago. There was no past and current pricing made publically to the smallholder. Interview with Agrofor confirms that there are not aware of the price before they sell the FFB at the mill. Thus, a minor non-conformity is raised	Minor nonconformance
6.10.2	Evidence shall be available that growers/millers have explained FFB pricing, and pricing mechanisms for FFB and inputs/services shall be documented (where these are under the control of the mill or plantation). -Major compliance-	The contract with Agrofor dated 15/05/2017 was reviewed. The contract is an annually contract. The pricing mechanism is provided in Annex 1. During the interview with Agrofor, it was confirmed that the pricing mechanism was understood. The contract was renewed on 01/02/2019.	Complied
6.10.3	Evidence shall be available that all parties understand the contractual agreements they enter into, and that contracts are fair, legal and transparent.	OPG has established the SOP for Central Procurement Unit – Common Functions (Ref no: SOP/PRO/S01) dated 01/01/2016. For fair and transparent contracting, the SOP indicated that for purchase less than	Complied

Criterion / Indicator		Assessment Findings	Compliance
	-Minor compliance-	1,000,000 XAF – 1 bid is sufficient; for 1,000,000 – 5,000,000 XAF – 2 or more competitive bids and Above 5,000,000XAF 3 or more competitive bids are required. Sample of purchase of Chemical dated 19/04/2019. Base on price comparison and payment terms, PT Dalzon was selected.	
6.10.4	Agreed payments shall be made in a timely manner. -Minor compliance-	Interview with the Agrofor confirmed that payment of the FFB was made on a timely manner. Usually payment will be processed once the invoice is send to OPG.	Complied
Criterion 6.11 Growers and millers contribute to local sustainable development where appropriate.			
6.11.1	Contributions to local development that are based on the results of consultation with local communities shall be demonstrated. -Minor compliance-	<p>The local development for are focused on Education and Health. The consultation processes are done with the local communities. The results of the consultation is then put into contractual agreement in the Social Contract. For Awala site, the addendum of the Social Contract was on 24/04/2019. The addendum was a results of a consultation on 15/02/2019.</p> <p>For Makouke site, the social contract was developed and agreed n 19/04/2019. The development progress was verified. Sample of purchasing of speedboats dated 17/06/2019.</p> <p>On a year basis OPG will submit the Update on the Environment and Social Management plan implemented to the Director General of Environmental and Nature Conservation. The last report submitted was dated 23/05/2019.</p> <p>Other than contribution on health and education, OPG also provide business opportunity to local community including contract for</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance
		<p>transporting workers and worker supply. Contract with Dembi Management ET FILS was reviewed.</p> <p>The Awala social team has established a working committee to educate the female community regarding financial planning and providing resources for the local female to start farming that could generate revenue.</p>	
6.11.2	Where there are scheme smallholders, there shall be evidence that efforts and/or resources have been allocated to improve smallholder productivity. -Minor compliance-	There is no scheme smallholders is associated with OPG operations.	Not applicable
Criterion 6.12 No forms of forced or trafficked labour are used.			
6.12.1	There shall be evidence that no forms of forced or trafficked labour are used. -Major compliance-	<p>During the interview with OPG’s harvesters, there were no evidence observed that salary was withhold due to not able to complete their daily task.</p> <p>However please refer to finding 6.5.2 on managing the contractors’ compliance OPG’s employment policy.</p>	Complied
6.12.2	Where applicable, it shall be demonstrated that no contract substitution has occurred. -Minor compliance-	OPG employed Indonesian workers as maids at Makouke estate. As per the original contract signed in Indonesia dated 15/09/2017 the salary is USD656 with daily food allowance of USD6. However, upon arrival to Gabon, a separate contract has been signed dated 23/09/2017 in which the salary now is CFA328,000 with daily food allowance of CFA3,000. This is considered contract substitution as a separate contract has been signed upon arrival to Gabon with a lower salary when it is exchanged back to Indonesian Rupiah (The USD exchange rate to Indonesian Rupiah on 15/09/2017 was USD1 to IDR13,242 while CAF to Indonesia Rupiah on 23/09/2017 was CFA1 to IDR24.172. The salary value if it is paid in USD will be IDR8,686,752 which is higher if the salary is paid in CAF which will be IDR7,928,416). Thus,a minor non-conformity was raised	Minor nonconformance

Criterion / Indicator		Assessment Findings	Compliance
6.12.3	Where temporary or migrant workers are employed, a special labour policy and procedures shall be established and implemented. -Major compliance-	OPG has developed the Foreign Worker’s Recruitment Policy dated 18/05/2017 to commit to ensure that all workers identified and recruited from overseas are given facilities and benefits in accordance to internationally accepted standards consistent with an orderly manpower recruitment and management practices particular in the Agriculture sector is Gabon plantations. Interview conducted with the Indonesian workers shows that there are satisfied with the current conditions especially the housing facilities and medical care.	Complied
Criterion 6.13 Growers and millers respect human rights.			
6.13.1	A policy to respect human rights shall be documented and communicated to all levels of the workforce and operations (see Criteria 1.2 and 2.1). -Major compliance-	Olam Palm Gabon has established the Human Rights Policy where the company committed to treat its’ employees with dignity, fairness and respect. They abide by all the international labour laws and local regulations in the countries. The policy has been briefed to all the workers during induction and the policy is displayed on the notice board at the vicinity of the operating units.	Complied
Principle 7: Responsible development of new plantings			
Awala Palm Oil Mill Certification Unit and supply base did not carry out any new plantings since November 2005. Therefore, Principle 7 is not applicable during this annual surveillance assessment. The immature areas are replanted area. Noted that 395 ha of NPP area planted in Bindo Estate without NPP process by the previous owner which acquired in 2016 from SIAT. Sanction is applied for the first 3 years from the date of certification for the crop produce from 395 ha of OP planted area.			
Principle 8: Commitment to continuous improvement in key areas of activity			
Criterion 8.1 Growers and millers regularly monitor and review their activities, and develop and implement action plans that allow demonstrable continual improvement in their key operations.			
8.1.1	The action plan for continual improvement shall be implemented, based on a consideration of the main social and environmental impacts and opportunities of the grower/mill, and shall include a range of Indicators covered by these Principles and Criteria. -Major compliance-	In the continuous improvement plan for social, OPG has identified to improve housing facility for its growing work force. For 2019, it was identified in Makouke estate that 15 new type G10 housing will be built. The 2019 budget has allocated USD3,000,000 for new staff housing.	Complied

Appendix B: Approved Time Bound Plan



RSPO Certification Time Bound Plan (revised May 2019¹)

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

¹ Last revisions in Aug 2016 to include OPG's latest acquisition i.e. Makouke and April 2018 to bring forward Lot 3 initial certification from 2019 to 2018.

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

³ Lot 3 certified under Mouila Bilala Mill supply base.



Mouila LOT 2	NPP notification			Dec 13									
	RSPO initial certification												Dec 21
	RSPO surveillance audit												
GRAINE	SOTRADER joined RSPO				July 15								
	NPP notification					June 16							
	RSPO independent gap assessment						Dec 17						
	RSPO initial certification ⁴								Dec 20				
	100% certification of GRAINE Palm SH												

Handwritten signature and date: 24 June 2019

Appendix C: GHG Reporting Executive Summary

The GHG emissions that were produced in **2018** for **Awala Palm Oil Mill** and supply base was calculated using the PalmGHG Calculator version 3.0.1. The assessment team had verified the data input in the PalmGHG Calculator against operations records. PalmGHG Calculation Options selected 'Full version' and 'Exclude LUC Emission' calculation option is not applied. The records verified includes:

- i. Estates area planted data
- ii. Fuel consumed
- iii. Mill data 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 **2018** for **Awala Palm Oil Mill** and supply base are as following:

Emission per product	tCO ₂ e/tProduct
CPO	-5.85
PK	-5.85

Extraction	%
OER	23.94
KER	4.04

Production	t/yr
FFB Processed	72,395.89
CPO Produced	17,328.35
PK Produced	2,924.76

Land Use	Ha
OP Planted Area	12,756.83
OP Planted on peat	0
Conservation (forested)	24,298.47
Conservation (non-forested)	0
Total	37,055.30

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	128,090.45	2.6	62,479.41	2.7	0	0	190,569.86	5.3
CO ₂ Emission from fertilizer	2,745.15	0.06	3,145.36	0.14	0	0	5,890.51	0.20
NO ₂ Emission	2,221.50	0.05	1,774.75	0.08	0	0	3,996.25	0.13
Fuel Consumption	3,577.39	0.07	2,331.66	0.10	0	0	5,909.05	0.17
Peat Oxidation	0	0	0	0	0	0	0	0
Sink								
Crop Sequestration	-63,875.11	-1.3	-55,550.93	-2.4	0	0	-119,426.04	-3.7

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Conservation Sequestration	-110,340.88	-2.24	-106,073.10	-4.59	0	0	-216,413.98	-6.83
Total	-37,581.50	-0.76	-91,892.85	-3.97			-129,474.35	-4.73

*Note: Includes both estates and smallholders

Summary of Mill Emission and Credit

	tCO ₂ e	tCO ₂ e/tFFB
Emission		
POME	10,793.28	0.15
Fuel Consumption	259.24	0
Grid Electricity Utilisation	0	0
Export of Grid Electricity	0	0
Sales of PKS	0	0
Sales of EFB	0	0
Total	11,052.52	0.15

Summary of Kernel Crusher Emission and Credit (if applicable)

Emissions	tCO ₂ e
PK from own mill	-17,102.07
PK from other source	0
Fuel Consumptions	259.24
Total Crusher emissions	-16,842.83

*This mill has no kernel crusher operation.

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 D: General Chain of Custody Requirements for the Supply Chain

General Chain of Custody Requirements for the Supply Chain			
Requirement		Evidence	Compliance (Yes/No/N/A)
5.1 Applicability of the general chain of custody requirements for the supply chain			
5.1.1	The General Chain of Custody requirements of the RSPO Supply Chain Standard shall apply to any organization throughout the supply chain that takes legal ownership and physically handles RSPO Certified Sustainable oil palm products at a location under the control of the organization including outsourced contractors. After the end product manufacturer, there is no further requirement for certification.	Olam International Ltd (Awala POM) takes legal ownership and physically handle the RSPO Certified Sustainable oil palm products. All trading, contract and sales are managed by Sustainability team in Malaysia and held the PalmTrace registration number for Awala Palm Oil Mill: RSPO_PO1000002779.	Yes
5.1.2	Traders and distributors require a licence obtained from RSPO Secretariat to sell RSPO certified product but do not themselves require certification. When selling RSPO certified products, a licensed trader and/or distributor shall pass on the certification number of the product manufacturer and the applicable supply chain model.	Awala Palm Oil Mill is not a trader and distributor. Therefore, no license is required and the requirement is not applicable.	N/A
5.1.3	Either the operator at site level or its parent company seeking certification shall be a member of the RSPO and shall register on the RSPO IT platform.	Olam International Ltd held RSPO membership number: 1-0114-12-000-00 since 10/2/2011. Company has registered in PalmTrace system as follows: Members ID – Awala Palm Oil Mill: RSPO_PO1000002779. Licence valid until 24/8/2019 Member category : Oil Mill	Yes
5.1.4	Processing aids do not need to be included within an organization’s scope of certification.	No processing aids used in the palm oil mill processes.	N/A

5.2 Supply chain model			
5.2.1	The site can only use the same supply chain model as its supplier or go to a less strict system. Declassification/downgrading can only be done in the following order: Identity Preserved -> Segregated -> Mass Balance.	Awala Palm Oil Mill is using Mass Balance Supply Chain Module since the FFB suppliers are from own certified supplying estate and non-certified suppliers (uncertified management unit's estate and independent smallholder). Declassification of the CPO or PK was done in accordance to the correct order (Mass Balance > conventional @ non-certified)	Yes
5.2.2	The site can use one (1) or a combination of supply chain models as audited and certified by the CB.	Awala Palm Oil Mill is Mass Balance certified and sales of the products were of MB or conventional only.	Yes
5.3. Documented Procedures			
5.3.1	The site 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: <ul style="list-style-type: none"> Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements. 	SOP for RSPO Supply Chain & Traceability (Mass Balance Model) with Doc. No. APOM-SC/MB/001; rev: 3 dated 23/5/19 was developed. The scope of the procedure is to cover the entire supply chain activities and record data from the intake of certified and non-certified raw material till the delivery of certified and non-certified products such as processing, sales and goods out, record keeping and monitoring, production volume, training, claims, complaints, internal audit and management review.	Yes
	<ul style="list-style-type: none"> Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records). 	<p>Among the records that available for verification as per the following:</p> <ol style="list-style-type: none"> Weighbridge tickets Dispatch of CPO/PK delivery order Daily Production Report FFB Despatch Report from supplying estate Training records FFB Transaction records <p>All the records were found to be up-to-date.</p>	Yes

		There was a training on the Standard Operating Procedure on Traceability and Supply Chain Module for Mill and Estate Representative carried out by Mill Engineer on 26/2/2019. Attendance list was sighted where Office Clerk, Laboratory Operator, estates' personnel and Weighbridge Operator have participated in the training.	
	<ul style="list-style-type: none"> 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 organization's procedures for the implementation of this standard. 	<p>SOP for RSPO Supply Chain & Traceability (Mass Balance Model) with Doc. No. APOM-SC/MB/001; rev: 3 dated 23/5/19 has clearly identified every responsible personal who involved in the implementation RSPO Supply Chain Certification.</p> <p>The Mill Manager is responsible to ensure the operation in the mill are being progressed systematically as per SOP in compliance with RSPO P&C and SCCS and appointment letter was sighted.</p>	Yes
5.3.2	The site shall have a written procedure to conduct annual internal audit to determine whether the organization;	SOP for RSPO Supply Chain & Traceability (Mass Balance Model) with Doc. No. APOM-SC/MB/001; rev: 3 dated 23/5/19 has clearly stated the internal audit process. Besides, <i>Procedure De Conduite Des Audits Et Controles Internes</i> (Procedure of Conducting and Control of Internal Audit) with Doc. No. SOP N 010/CRS AUD INT(01)/0618, Re. 1 dated June 2018 was developed and stated the internal audit shall be conducted at least once a year.	Yes
	i) Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.		
	ii) Effectively implements and maintains the standard requirements within its organization.	The internal audit for supply chain shall be conducted on annual basis and the last internal audit was conducted on 28/11/18 to 1/12/18 combined with RSPO P&C audit by Sustainability Department and CRS Department. There was no non- conformity raised during the audit.	Yes
5.4. Purchasing and goods in –			

5.4.1	<p>The receiving site shall ensure that purchases of RSPO certified oil palm products are in compliance and the following minimum information for RSPO certified products is made available by the supplier in document form:</p> <ul style="list-style-type: none"> • The name and address of the buyer; • The name and address of the seller; • The loading or shipment/delivery date; • The date on which the documents were issued; • A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations); • The quantity of the products delivered; • Any related transport documentation; • Supply Chain certificate number of the seller; • A unique identification number 	<p>When FFB delivered to the mill from the estate, the transporters presented FFB despatch report to the mill weighbridge clerk in order the FFB to be received by the mill.</p> <p>E.g. of information available in the FFB delivery record and mill's weighbridge tickets is as follows:</p> <ul style="list-style-type: none"> • FFB despatch sheet no. 015724, 015727, 015837, 015492, 015481 and 015486. • Estate's names (Komo, Lobe, Bokoue) • Date & time of delivery (30/5/19, 27/5/19, 27/3/19 and 31/5/19) • Division/block No.(Komo div.3, Bokoue div.2, Lobe div.2,) • Weight (total nett weight) • RSPO certificate number, RSPO 651890 	Yes
	<ul style="list-style-type: none"> • 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>The information was available in various documents such as FFB despatch report and weighbridge tickets.</p>	Yes
	<ul style="list-style-type: none"> • The site receiving RSPO certified oil palm products shall ensure that the products are verified as being RSPO certified. For sites that are required to announce and confirm trades in the RSPO IT platform, this shall include making Shipping Announcements/Announcements and Confirmations on the RSPO IT platform per shipment or group shipments. Refer to section 5.7.1 of this document for further guidance. 	<p>Awala POM received RSPO certified oil palm products (FFB) from certified estates namely (Komo, Lobe and Bokoue Estate). No shipping announcement/confirmations available for FFB deliveries.</p>	Yes
	<ul style="list-style-type: none"> • A check of the validity of the Supply Chain Certification of suppliers is required for all sites that are SC certified. This shall be checked via the list of RSPO Supply Chain Certified sites on the RSPO website 	<p>The site does not need to check the certificate validity of the FFB source, because the source is from own certified estate under Awala Plantation. If required, validity check of supply chain certification of</p>	Yes

	(www.rspo.org) at least annually or through the RSPO IT Platform by confirmation of (shipping) announcements.	supplier is done via the list of RSPO Supply Chain Certified sites on the RSPO website (www.rspo.org).	
	<ul style="list-style-type: none"> The validity of license for traders and distributors shall also be checked via the RSPO website at least annually or through the RSPO IT platform by confirmation of shipping announcements / announcements. 	NA – this part is applicable for supply chain actor after refinery	N/A
5.4.2	The site shall have a mechanism in place for handling non-conforming oil palm products and/or documents.	Awala POM has established RSPO Supply Chain and Traceability (Mass Balance Model) Procedure, APOM-SC/MB/001; rev: 3 dated 23/5/19. The procedure (clause 1.6.1) stated that mill security and weighbridge clerk/operator to consult with mill manager if they are in doubt on the source/ origin (certified or non- certified) of the raw materials. Interviewed with the weighbridge operator and confirmed that she is well aware on the relevant scenario.	Yes
5.5. Outsourcing activities –			
5.5.1	<p>In cases where an operation seeking or holding certification outsources activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the operation seeking or holding certification shall ensure that the independent third party complies with the requirements of the RSPO Supply Chain Certification Standard. A CPO mill and independent mil cannot outsource processing activities like refining or crushing.</p> <p>This requirement is not applicable to outsourced storage facilities where the management of the oil palm product(s) and instructions for tank movements are controlled by the certified organization (not the tank farm manager).</p>	No bulking facilities outsourced by the mill. The only outsourcing activity is transportation of CPO. The CPO transporter is outsourced to sister logistic company – GSEZ (Under Olam Group) where Olam has the management control. Verified the latest revised dated 8/6/18.	Yes
5.5.2	Sites which include outsourcing within the scope of their RSPO Supply Chain certificate shall ensure the following:	There is no outsourced process within Awala Palm Oil Mill, hence this requirement is not applicable.	N/A

	a. The site has legal ownership of all input material to be included in outsourced processes;		
	b. The site 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 site to ensure that certification bodies (CBs) have access to the outsourcing contractor or operation if an audit is deemed necessary.	There is no outsourced process within Awala Palm Oil Mill, hence this requirement is not applicable.	N/A
	c. The site has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.	There is no outsourced process within Awala Palm Oil Mill, hence this requirement is not applicable.	N/A
	d. The site seeking or holding certification 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 any and all information, when this is announced in advance.	There is no outsourced process within Awala Palm Oil Mill, hence this requirement is not applicable.	N/A
5.5.3	The site shall record the names and contact details of all contractors used for the processing or physical handling of RSPO certified oil palm products.	As of yet, no processing or physical handling of RSPO certified palm products by contractors.	N/A
5.5.4	The site shall at its next audit inform its CB of the names and contact details of any new contractor used for the processing or physical handling of RSPO certified oil palm products.	Not applicable.	N/A
5.6. Sales and goods out –			
5.6.1	The supplying site shall ensure that the following minimum information for RSPO certified products is made available in document form. <ul style="list-style-type: none"> • The name and address of the buyer; • The name and address of the seller; 	No sales of certified CPO to buyer from June 2018 to May 2019. All certified PK send to Awala integrated KCP and having own RSPO SCC certificate. Method of transfer is by air transport system @ fan/blower system.	Yes

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	<ul style="list-style-type: none"> • The loading or shipment/ delivery date; • The date on which the documents were issued; • A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations); • The quantity of the products delivered; • Any related transport documentation; • Supply chain certificate number of the seller; • A unique identification number 	<p>The following information were available in across the documents, such as buyer contract, certificate of analysis, bill of lading. The information template were as per below:</p> <p>Bill Lading No: Address/Country: Contract No: Quantity: Product/Comodity: Transport: Supply chain cert no:</p>	
	<ul style="list-style-type: none"> • 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>The following information were available in across the documents, such as buyer contract, certificate of analysis, bill of lading. The information template were as per below:</p> <p>Bill Lading No: Address/Country: Contract No: Quantity: Product/Comodity: Transport: Supply chain cert no:</p> <p>No sales of certified CPO to buyer from June 2018 to May 2019. All certified PK send to Awala integrated KCP and having own RSPO SCC certificate. Method of transfer is by air transport system @ fan/blower system.</p>	<p>Yes</p>
	<ul style="list-style-type: none"> • For sites that are required to announce and confirm trades in the RSPO IT platform, this shall include making Shipping Announcements / Announcements and Confirmations on the RSPO IT platform per shipment or group of shipments. Refer to section 5.7.1 of this document for further guidance. 	<p>Only 2 consignments of certified PK for the last review period and cross reference to PKO sales from Awala Integrated KCP.</p> <p>i) Transaction reference, TR-76fc5caf- 7d0c dated 5/3/19 for 773.68 mt ii) Transaction reference, TR- 82c6e998-306c dated 5/3/19 for 773.68 mt</p>	<p>Yes</p>

5.7. Registration of transactions			
5.7.1	<p>Supply chain actors who:</p> <ul style="list-style-type: none"> • Are mills, traders, crushers and refineries and; • Take legal ownership and/or physically handle RSPO Certified Sustainable oil palm products that are available in the yield scheme of the RSPO IT Platform (Figure 2 and 3, Refer Annex 1) shall register their transaction in the RSPO IT platform and confirm upon receipt where applicable. 	<p>The registration of PalmTrace is handled by the General Manager of Sustainability in Head Office. All the transactions will be registered in the PalmTrace. Company has registered their mill in the PalmTrace with Member ID: Awala Palm Oil Mill: RSPO_PO1000002779. Licence valid until 24/8/2019 Member category: Oil Mill</p>	Yes
5.7.2	<p>The involved supply chain actors mentioned in 5.7.1 shall do the following actions in the RSPO IT Platform:</p> <ul style="list-style-type: none"> • Shipping Announcement / Announcement: When RSPO certified volume is sold as certified, the volumes of products that are in the yield scheme (Figure 2 and 3, refer Annex 1) shall be registered as a Shipping Announcement / Announcement in the RSPO IT Platform. The declaration time to do Shipping announcement / Announcement is based on members' own standard operating procedures. 	<p>Shipping announcement of transactions of RSPO certified PK was done by General Manger of Sustainability in Malaysia in the RSPO IT Platform after the shipment has loaded. Sampled the shipping announcement 5.6.1</p>	Yes
	<ul style="list-style-type: none"> • Trace: When RSPO certified volumes are sold as RSPO certified to actors in the supply chain beyond the refinery, the volume shall be traced at least annually. Tracing triggers the generation of a trace document with a unique traceability number. Tracing can be done in a consolidated way at least annually. 	<p>Every shipping announcement made accordingly as unique id for traceability and recorded accordingly in the RSPO Supply Chain & Traceability (Mass Balance) Data Sheet and update at weekly basis by the mill and send to Sustainability Department.</p>	Yes
	<ul style="list-style-type: none"> • Remove: RSPO certified volumes sold under other scheme or as conventional, or in case of underproduction, loss or damage shall be removed. 	<p>There was volume sold for other scheme and conventional (refer to Table 11 & 12; Supply Chain declaration of Table C & D; Summary Template).</p>	Yes
	<ul style="list-style-type: none"> • Confirm: Acknowledge the purchase of RSPO certified volume by confirming Shipping Announcements / Announcements. 	<p>Sampled of shipping announcement documents and found that the management done the shipping announcement accordingly. Refer to criteria 5.6.1.</p>	Yes

5.8. Training			
5.8.1	The organization shall have a training plan on RSPO Supply Chain Standards requirements, which is subject to on-going review and is supported by records of the training provided to staff.	Training Program for Year 2019 was developed for Awala Plantation where RSPO SCCS training is incorporated into the plan.	Yes
5.8.2	Appropriate training shall be provided by the organization for personnel carrying out the tasks critical to the effective implementation of the supply chain certification standard requirements. Training shall be specific and relevant to the task(s) performed.	Latest refresher training was carried out for the mill SCC team and weighbridge operator. Training for the new weighbridge operator was done on 12/4/19 where the refresher to the SCC team was conducted on 20/2/19.	Yes
5.9. Record Keeping –			
5.9.1	The organization shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of these RSPO Supply Chain Certification Standard requirements.	Awala Palm Oil Mill has maintained the accurate, complete, up-to-date and accessible records and reports covering all aspects of these RSPO Supply Chain Certification requirements. All records also available in SAP system which is retrievable at anytime.	Yes
5.9.2	Retention times for all records and reports shall be a minimum of two (2) years and shall comply with legal and regulatory requirements and be able to confirm the certified status of raw materials or products held in stock.	Awala POM has established RSPO Supply Chain and Traceability (Mass Balance Model) Procedure, APOM-SC/MB/001; rev: 3 dated 23/5/19. The procedure stated that all the relevant documents in relation to RSPO SCCS certification must be kept for minimum of 2 years	Yes
5.9.3	The organization shall be able to provide the estimate volume of palm oil/palm kernel oil content (separate categories) in the RSPO certified oil palm product and keep an up to date record of the volume purchased (input) and claimed (output) over a period of twelve (12) months.	Estimated volume for the next 12 month (June 2019 – May 2020) CPO: 34,979.39 mt PK: 6,424.79 mt	Yes
5.10. Conversion factors			
5.10.1	Where applicable a conversion rate shall be applied to provide a reliable estimate for the amount of certified output available from the associated inputs. Organizations may determine and set their own conversion rates	Conversion factor of CPO and PK production is depending on the actual OER and KER. Last year's average from June 2018 to May 2019 were 23.68 % (OER) & 4.4 % (KER).	Yes

	which shall be based upon past experience, documented and applied consistently. Guidance on conversion rates is published on the RSPO website (www.rspo.org); RSPO Rules for Physical Transition of Oleochemicals and its Derivatives. This is relevant for derivatives of Palm Oil and Palm Kernel Oil, as used in the oleo-chemical and personal care industries.		
5.10.2	Conversion rates shall be periodically updated to ensure accuracy against actual performance or industry average if appropriate.	The facility is using the actual extraction rate and therefore updating of rates is not necessary.	N/A
5.11. Claims –			
5.11.1	The site shall only make claims regarding the use of or support of RSPO certified oil palm products that are in compliance with the RSPO Rules on Market Communications and Claims.	No claim regarding the use of or support of RSPO certified oil palm products was seen as the CPO and PK is not final product. IF there is any claim made for the sales of certified palm product, pertinent supply chain traceability information will appear in shipping documents and in compliance with the RSPO Rules on Market Communications and Claims.	Yes
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.	No RSPO logo was use in any general corporate communication by verified through the company website, invoices, letter head, contract with customers and others relevant records.	Yes
4.2	In corporate communications a member is allowed to: a. display its RSPO membership status b. display the RSPO web address (www.rspo.org) c. state that the member supports the work of the RSPO d. state the member's history with regard to the RSPO.	No RSPO corporate logo usage was observed in Olam webpage, official documentations, contracts and facilities.	Yes

	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.		
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.	The Olam website did not show that their membership implies the selling of RSPO-certified oil palm products. In the Palm Quarterly Dashboard published in Olam website, it is published that there are currently 2 certified mills.	Yes
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.	Corporate communication by OPG has not mislead consumers.	Yes
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.	No RSPO corporate logo usage was observed in Olam webpage, official documentations, contracts and facilities.	Yes
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.	Please refer to 5.11.1 as there is a potential Business to Business communication.	Yes
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.	At the moment the company only claim the PK. Please refer to 5.6.1	Yes
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:	Not applicable as the company is not distributor or wholesale.	N/A

	<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>		
5.4	<p>A certified member can provide information to its customers detailing the presence of certified palm oil contained within a product even if it is not eligible for a product-specific under RSPO rules. The end product must not be labelled as certified or sold in such a way that implies RSPO certification.</p> <p>For example, a retailer or food service company may require a breakdown of all palm based ingredients within an end product and the certified status of each. This information may be provided by a certified RSPO member without constituting a product-specific claim.</p>	Refer to 5.11.1	Yes
Business to consumer communication			
6.1	<p>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.</p>	No business to consumer communication as to date.	Yes

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.	No business to consumer communication as to date.	Yes
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.	No business to consumer communication as to date.	Yes
6.4	Business to consumer communication shall not include information about the claimant's RSPO membership status.	No business to consumer communication as to date.	Yes
6.5	Members shall not communicate to consumers information about their suppliers' RSPO membership status.	No business to consumer communication as to date.	Yes
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.	No business to consumer communication as to date.	Yes
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.	No business to consumer communication as to date.	Yes
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	No business to consumer communication as to date.	Yes

	<p>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.rsपो.org.</p>		
<p>MODULE A – IDENTITY PRESERVED & SEGREGATED SPECIFIC RULES</p>			
<p>Certified oil palm content (IP)</p>			
	<p>Where there is any percentage of non-certified oil palm within the product, the reason for this must be fully justified and an action plan for moving to fully certified oil palm must be in place, in accordance with the requirements of the RSPO SCCS. In addition, the volume of non-certified oil palm products must be covered by the purchase of RSPO Credits of equivalent volume.</p>	<p>N/A</p>	<p>N/A</p>
<p>Labelling and trademark (IP)</p>			
	<p>Members are allowed to use the RSPO label in one of the following ways:</p> <ul style="list-style-type: none"> a. RSPO trademark which includes the tag 'CERTIFIED' or • RSPO trademark which includes the tag 'This product contains certified sustainable palm oil'. Wherever a RSPO trademark is displayed, the applicable trademark license number must be shown immediately under or next to the trademark or the 'statement'. Font must be Calibri, font size must be at least 4pt (1.4 mm or 0.06 inch). In on-pack communications, the RSPO trademark can be printed anywhere on the pack. 	<p>N/A</p>	<p>N/A</p>
<p>Messaging (IP)</p>			

	<p>Messaging ALLOWED in storytelling in product-related communications may include some or all of the following elements:</p> <ul style="list-style-type: none"> • The oil palm products contained in this product have been certified to come from RSPO sources. www.rspo.org • By choosing this product, you are sure it contains RSPO-certified palm oil. For more information: www.rspo.org • RSPO-certified sustainable oil palm products were kept apart from other oil palm products throughout the supply chain. www.rspo.org • Certified sustainable oil palm products can be traced back to RSPO-certified mills and plantations. www.rspo.org • The entire supply chain is monitored by independent, RSPO-accredited auditors. www.rspo.org • RSPO-certified sustainable palm oil has been produced to stringent environmental and social criteria. www.rspo.org • References to (or images of) particular RSPO-certified production units, if the relationship to those units can be shown by company records. 	N/A	N/A
MODULE B – MASS BALANCE SPECIFIC RULES			
Minimum Mass Balance content			
	<p>Where there is any percentage of non-certified oil palm within the product, the reason for this must be fully justified and an action plan for moving to fully certified oil palm must be in place, in accordance with the requirements of the RSPO SCCS. In addition, the non-certified volume must be covered by equivalent volume of RSPO Credits.</p>	Awala POM is producing RSPO MB product and no MB claim made within review of June 2018 to May 2019	Yes
Labelling and trademark (MB)			

<p>Members are allowed to use the RSPO label in one of the following ways:</p> <ul style="list-style-type: none"> • Surrounded by the text: 'Certified sustainable palm oil'. • The RSPO label MUST contain the tag 'MIXED'. The tag MIXED designates oil palm products sourced under the Mass Balance (MB) supply chain system, which administratively balances inputs and outputs of certain palm oil volumes. The tag 'MIXED' on a product does not guarantee that the product itself contains the certified material; some or all of it may reside in a product that does not carry a claim. • The RSPO label can also include the statement: '[The palm oil contained in this product] contributes to the production of certified sustainable palm oil'. Wherever the RSPO trademark is displayed, the applicable trademark license number must be shown immediately under or next to the trademark or the 'statement'. Font must be Calibri, font size must be at least 4 pt (1.4 mm or 0.06 inch). In on-pack communications, the RSPO trademark can be printed anywhere on the pack. Further guidance on use of the trademark is provided in the RSPO Trademark License Terms and Conditions and in Annex 1 of the Rules on Market Communications & Claims document. 	<p>Awala POM is producing RSPO MB product and no MB claim made within review of June 2018 to May 2019</p>	<p>Yes</p>
<p>Messaging (MB)</p>		
<p>Messaging ALLOWED in storytelling in product-related communications includes:</p> <ul style="list-style-type: none"> • [Oil palm products]/[palm oil]/[palm kernel oil] from RSPO-certified mills and plantations were mixed with non-certified oil palm products in the supply chain. • The volume of [oil palm products][palm oil]/[palm kernel oil] in this product reflects an equivalent volume of palm oil or palm kernel oil produced by RSPO certified mills and plantations. In off-product 	<p>Awala POM is producing RSPO MB product and no MB claim made within review of June 2018 to May 2019</p>	<p>Yes</p>

	communications, reference to (or images of) particular RSPO-certified production units, if the relationship to those units can be shown in company records is allowed.		
	<p>Messaging NOT ALLOWED in storytelling in product-related communications:</p> <ul style="list-style-type: none"> Anything that can lead consumers to believe that RSPO-certified palm products are (certified to be) part of the product. 	Awala POM is producing RSPO MB product and no MB claim made within review of June 2018 to May 2019	Yes
MODULE C – PARTIAL PRODUCT CLAIMS			
	<p>To increase awareness among consumers of the availability of sustainable oil palm products and to help accelerate the uptake, it is permissible to make a claim on product when the percentage of the oil palm content is less than 95% certified, but only when the following conditions have been met:</p> <ul style="list-style-type: none"> The member making the claim is the end product manufacturer, is an RSPO member and is certified against the RSPO SCCS or is an RSPO retailer member authorized to use the trademark by the RSPO. At least 50% of the oil palm content has been supplied through an RSPO certified supply chain as IP, SG or MB. The remainder of the oil palm content that is not RSPO-certified is covered by the purchase of RSPO Credits to an equivalent volume. The product-specific claim is limited to only the following phrase: 'This product contributes to the production of certified sustainable palm oil'. The use of the RSPO label with this claim is mandatory and must include the tag '50% MIXED'. No other percentage is allowable within this claim. 	Awala POM is producing only RSPO MB product with mixture of FFB supplied inputs. Within review period of June 2018 to May 2019, no RSPO MB partial claim made.	Yes
MODULE D – COMBINED SUPPLY CHAIN MODELS SPECIFIC RULES			

	<p>Where a mixture of inputs supplied through different RSPO supply chain models are present in a product, the following applies:</p> <p>75% IP + 20% SG => 95% SG claim is made 65% SG + 30% MB => 95% MB claim is made 55% MB + 40% B&C => 95% partial product claim can be made 45% SG + 55% B&C < 50% B&C claim can be made</p>	<p>Awala POM is producing only RSPO MB product with mixture of FFB supplied inputs. Within review period of June 2018 to May 2019, no RSPO MB partial claim made.</p>	<p>Yes</p>
	<p>Where one supply chain model accounts for 95% of the oilpalm content, the claim for this specific model may be made:</p> <p>95% IP + 5% MB => 95% IP IP claim can be made 95% SG + 5% MB => 95% SG SG claim can be made 95% MB + 5% C => 95% MB MB claim can be made</p>	<p>Awala POM is producing only RSPO MB product with mixture of FFB supplied inputs. Within review period of June 2018 to May 2019, only 2 consignment of RSPO PK MB claim made.</p>	<p>Yes</p>
5.12. Complaints -			
5.12.1	<p>The organization shall have in place and maintain documented procedures for collecting and resolving stakeholder complaints.</p>	<p>Awala Palm Oil Mill has established <i>Procedure De Gestion Des Plaintes Et Reclamations</i> (Complaint Handling and Claims Procedure) with Doc. No. SOP N 07/CRS -GP(5)/0319, Rev. No. 05 dated 11/3/2019 to handle any stakeholder grievances and complaints for mill. There was no complaint received as to date.</p>	<p>Yes</p>
5.13. Management Review			
5.13.1	<p>The organization is required to hold management reviews annually at planned intervals appropriate to the scale and nature of the activities undertaken</p>	<p>The company held the management review on annual basics and based on their procedure - APOM-SC/MB/001; rev: 3 dated 23/5/19.</p> <p>The latest management review meeting was conducted on 22nd</p>	<p>Yes</p>

		May 2019. The management review specifically look into RSPO SCCS system. The meeting was chaired by the RSPO manager of Awala Plantation.	
5.13.2	<p>The input to management review shall include information on:</p> <ul style="list-style-type: none"> • Results of internal audits covering RSPO Supply Chain Certification Standard. • Customer feedback. • Status of preventive and corrective actions. • Follow-up actions from management reviews. • Changes that could affect the management system. • Recommendations for improvement. 	<p>The latest management review meeting was conducted on 22nd May 2019. The management review specifically look into RSPO SCCS system. The meeting was chaired by the RSPO manager of Awala Plantation. All the inputs have been discussed accordingly, eg: Results of internal audits covering RSPO Supply Chain Certification Standard, Customer feedback, Status of preventive and corrective actions, Follow-up actions from management reviews, Changes that could affect the management system, Recommendations for improvement.</p>	Yes
5.13.3	<p>The output from the management review shall include any decisions and actions related to:</p> <ul style="list-style-type: none"> • Improvement of the effectiveness of the management system and its processes • Resource needs. 	<p>Output from the management review meeting has been discussed during the management review meeting which has included resource needs and improvement of the effectiveness of the management systems and its processes.</p>	Yes

Appendix E: CPO Mill Supply Chain Assessment Report (Module E - CPO Mills: Mass Balance)

Requirements	Evidence For any N/A raised, justification is required.	Compliance (Yes / No or N/A)
E.1 Definition		
<p>E.1.1 Certification for CPO mills is necessary to verify the volumes of certified and uncertified FFB entering the mill and sales volume of RSPO certified products. 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>Awala POM is receiving FFBs from its own certified estates at Awala Site (Komo estate, Lobe estate and Bokoue estate) and smallholder FFBs. As the time of the assessment, estates at Makouke Site (Makouke Estate and Bindo-Benin Estate) was not yet certified. Furthermore, there will be an sanction applied to an estate at Makouke site (Bindo-Bifoun estate) due to non-submission of NPP prior development. However, it needs to be noted that the non-submission of NPP was not the fault of OPG as the land was developed by previous grower prior OPG acquired the land.</p>	<p>Yes</p>
E.2 Explanation		
<p>E.2.1 The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill shall be recorded by the CB in the public summary of the P&C certification report. For an independent mill, the estimated tonnage of CPO and PK products shall be recorded in the RSPO IT platform, supply chain certificate and public summary audit 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 estimated tonnage of CPO and PK products that could potentially be produced by the certified mill is recorded in this public summary report.</p>	<p>Yes</p>
<p>E.2.2 The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO supply chain managing organization (RSPO IT platform).</p>	<p>The registration of PalmTrace will be carried out by the General Manager of Sustainability in Head Office. All the transactions are registered in the PalmTrace. Company has registered their mill in the PalmTrace with</p>	<p>Yes</p>

	Member ID: Awala Palm Oil Mill: RSPO_PO1000002779 Member category: Oil Mill License expiry: 24/08/2019	
E.3 Documented procedures		
E.3.1 The site shall have written procedures and/or work instructions to ensure the implementation of all the elements specified in these requirements. This shall include at minimum the following: a) Complete and up to date procedures covering the implementation of all the elements in these requirements;	SOP for RSPO Supply Chain & Traceability (Mass Balance Model) with Doc. No. APOM-SC/MB/001, Rev. 3 dated 23/05/2018 was established. The scope of the procedure is to cover the entire supply chain activities and record data from the intake of certified and non-certified raw material till the delivery of certified and non-certified products such as processing, sales and goods out, record keeping and monitoring, production volume, training, claims, complaints, internal audit and management review. The requirements under new RSPO SCCS System and Standard revised June 2017 were incorporated into the SOP.	Yes
b) The name 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 site procedures for the implementation of this standard.	The Mill Senior Assistant Manager is responsible to ensure the operation in the mill are being progressed systematically as per SOP in compliance with RSPO P&C and SCCS and appointment letter was sighted.	Yes
E.3.2 The site shall have documented procedures for receiving and processing certified and non-certified FFBS.	SOP for RSPO Supply Chain & Traceability (Mass Balance Model) with Doc. No. APOM-SC/MB/001, Rev. 3 dated 23/05/2018 was established. The control on the certified and non-certified material happens at the weigh-bridge. In case of any doubt on the source, it shall be referred to the Mill Manager. The FFB are processed continuously and the record of the production are control through Daily Production Report / Daily Manager Production Report and SAP.	Yes

E.4 Purchasing and goods in		
E.4.1 The site shall verify and document the volumes of certified and non-certified FFBs received.	<p>The Mill has established the Daily Management Production Report to monitor the volume of certified and uncertified FFB received. The SAP system is also used to monitor the volume of FFB received at mill.</p> <p>The recorded certified FFB received: From Awala site’s estates (Lobe, Komo, Bokoue), the total FFB received for 01/07/2018 – 31/05/2019 is 46,946.83mt</p> <p>The recorded uncertified FFB received: From Makouke site’s estates (Makouke, Bindo-Benin, Bindo-Bifoun) the total FFB received for 01/07/2018 – 31/05/2019 is 24,207.58mt From smallholder (Agrofor), the total FFB received for 01/07/2018 – 31/05/2019 is 16.68mt.</p>	Yes
E.4.2 The site shall inform the CB immediately if there is a projected overproduction of certified tonnage.	The mill senior assistance manager was interviewed and understood that in case of any overproduction, it is required to be inform to CB through the Sustainable Team to request for additional volume.	Yes
E.5 Record keeping		
E.5.1 a) The site 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.	The balancing of the FFB inputs and the CPO & PK is completed on a weekly basis. The excel spread sheet (SCCS Mass Balance Awala Mill 2019) was reviewed. The data of the excel sheet are computed from the Daily Management Production Report. The excel sheet formulation was reviewed. The CPO stock that is available to sell at each month has considered any CPO credits sold.	Yes
(b) All volumes of palm oil and palm kernel oil that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO.	The OER and KER monitored for the period of 01/07/2018 – 31/05/2019 is 23.68% 4.39% respectively.	Yes

<p>c) The site can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three (3) months. However, a site is allowed to sell short.(ie product can be sold before it is in stock.)</p>	<p>No short sell of certified CPO and PK recorded for the period of 01/07/2018 – 31/05/2019. Due to the demand is uncertified oil, OPG has sell certified material as uncertified material. As on the assessment date, the total stock for certified CPO available is 6,647.86mt.</p>	<p>Yes</p>
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Supply Chain Declaration *(Applicable For Appendix E)*

A. Monthly Records of Certified and Uncertified FFB Received since the last audit (July 2018-May 2019)				
No.	Month - Year	Volume of FFB from certified supply bases (mt)	Volume of FFB from uncertified supply bases (mt)	Total FFB/Month (mt)
1	July 18	3,839.84	1,751.48	5,591.32
2	Aug 18	4,647.38	2,700.98	7,348.36
3	Sept 18	4,408.15	3,024.58	7,432.73
4	Oct 18	3,709.60	2,898.92	6,608.52
5	Nov 18	3,244.20	2,570.24	5,814.44
6	Dec 18	3,751.46	1,727.76	5,479.22
7	Jan 19	4,649.99	1,414.64	6,064.63
8	Feb 19	4,264.93	1,677.46	5,942.39
9	Mar 19	4,868.38	2,144.40	7,012.78
10	Apr 19	4,860.34	2,140.90	7,001.24
11	May 19	4,702.56	2,172.90	6,875.46
Total		46,946.83	24,224.26	71,171.09
<i>*uncertified crop include one smallholder Agrofor crop – Feb 2019 4.9MT; Mar 5.9MT, Apr 2.9MT, May 2.96MT.</i>				

B. Monthly Records of Certified CPO & PK since the last audit (July 2018-May 2019)			
No.	Month - Year	Certified CPO (mt)	Certified PK (mt)
1	July 2018	896	161.14
2	Aug 2018	1,145	201.11
3	Sep 2018	1,045	184.00
4	Oct 2018	781	153.27
5	Nov 2018	831.10	157.81
6	Dec 2018	946	165.38
7	Jan 19	1,076	191.90
8	Feb 19	1,040	191.18
9	Mar 19	1,150	213.22
10	Apr 19	1,151	228.28
11	May 19	1,054	211.82
Total		11,115.10	2,059.11

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C. Records of Certified CPO & PK Sold under PalmTrace to Buyers since the last audit (if any) (July 2018-May 2019)

No.	Buyers Name	Palmtrace Trading License Number	Certified CPO Sold (mt)	Certified PK Sold (mt)
1	OPG Awala KCP	TR-76fc5caf-7d0c	-	773.68
2	OPG Awala KCP	TR-82c6e998-306c	-	750.00
				1,523.68

D. Records of CPO & PK Sold under other schemes to Buyers since the last audit (if any) (July 2018-May 2019)

No.	Buyers Name	Scheme Name	CPO Sold (mt)	PK Sold (mt)
	Nil			

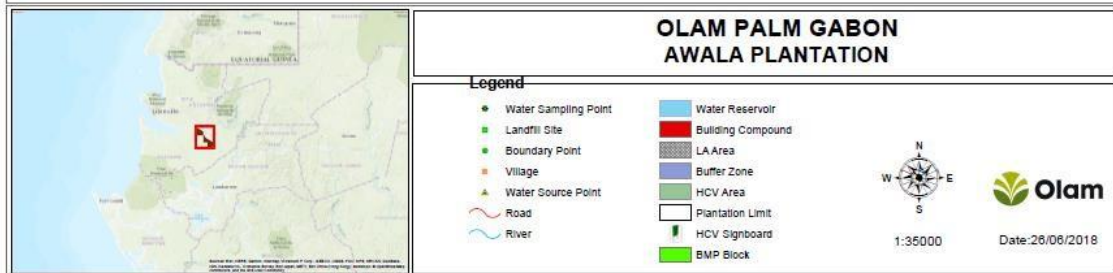
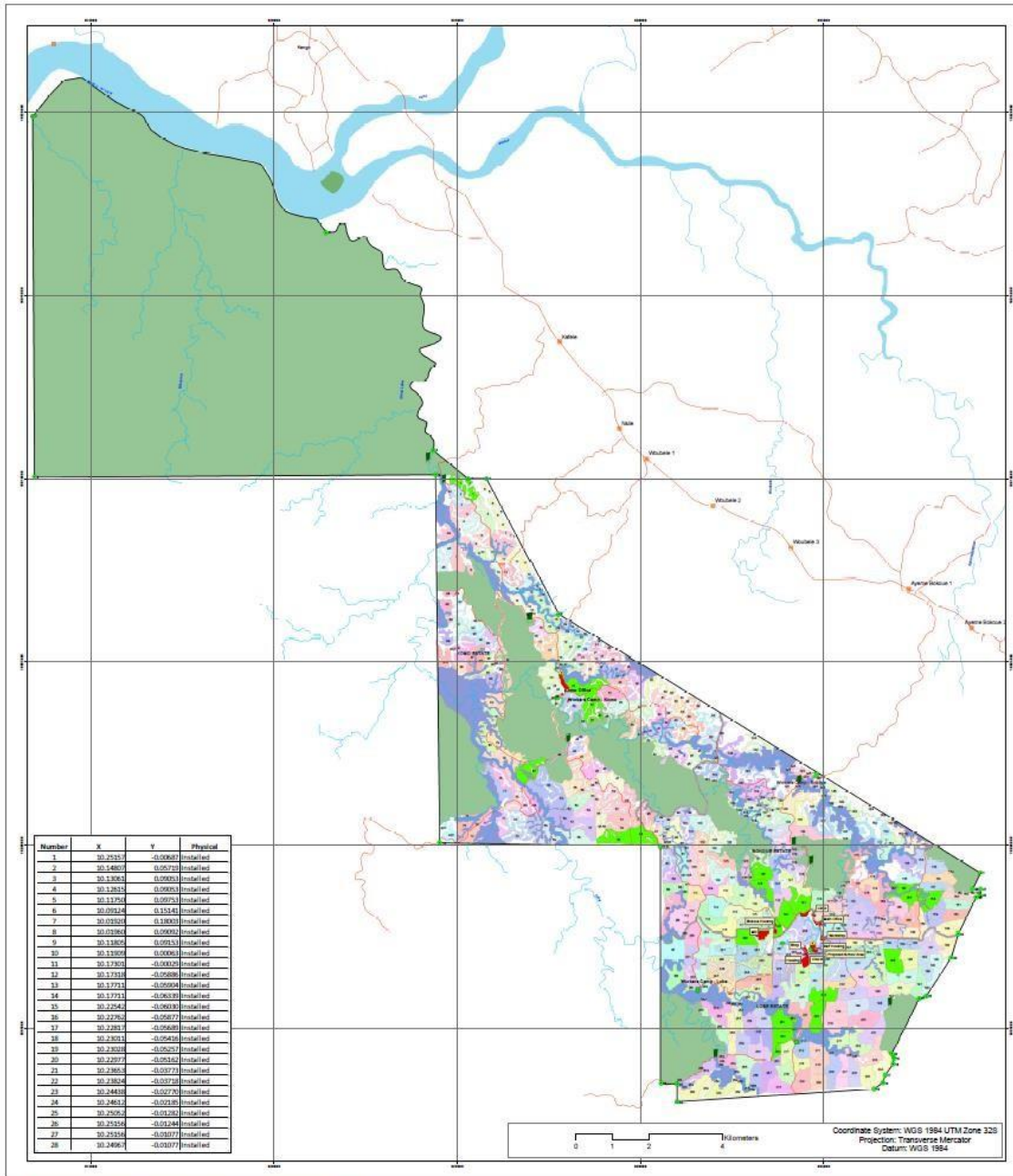
E. Records of CPO & PK Sold as conventional to Buyers since the last audit (if any) (July 2018-May 2019)

No.	Buyers Name	CPO Sold (mt)	PK Sold (mt)
1	Buyer A	705.84	-
2	Buyer B	2,971.81	-
3	Buyer C	2,855.21	-
4	Buyer D	1,125.646	-
		7,658.506	-

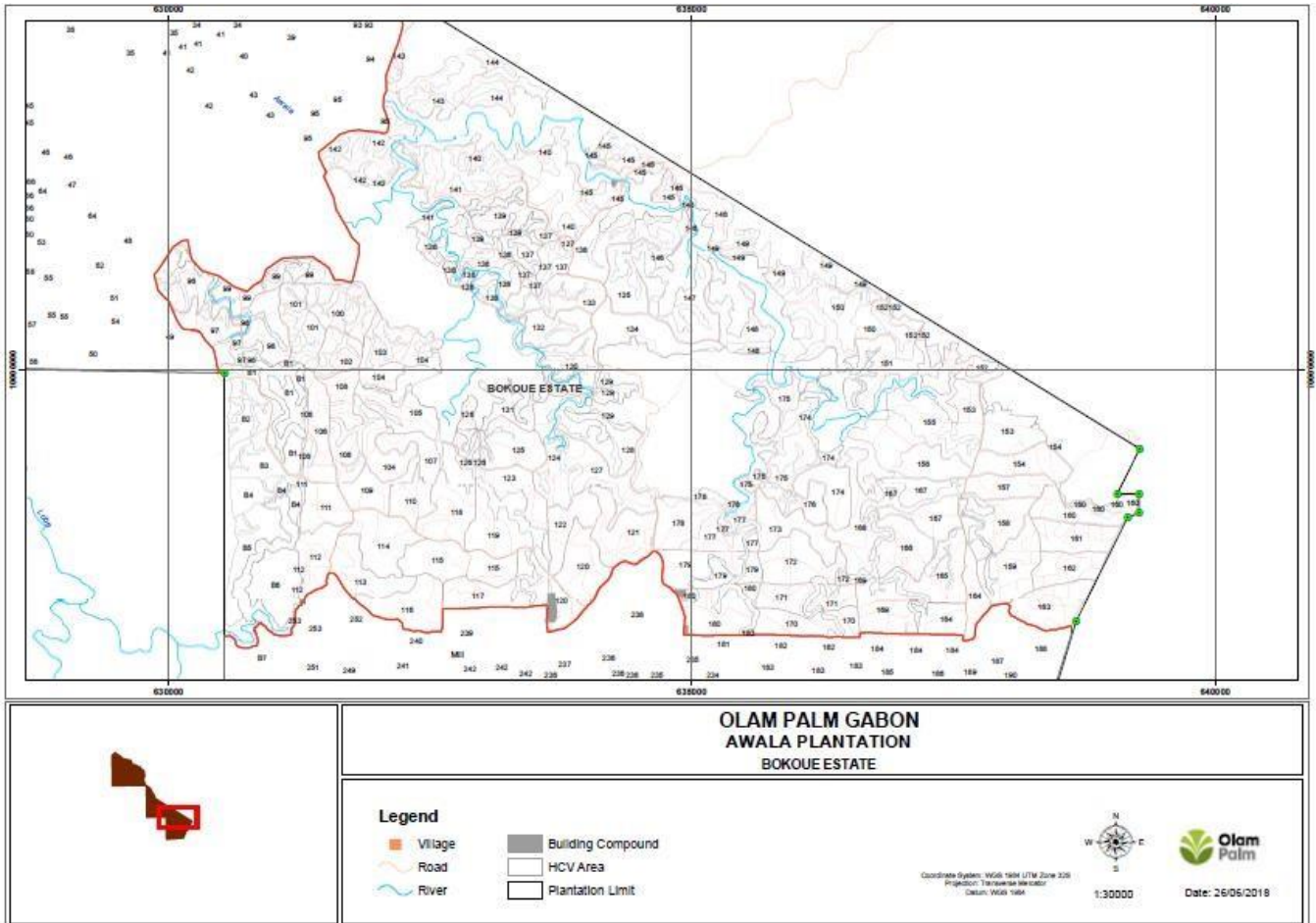
F. Records of Certified CPO Sold under RSPO Credits to Buyers since the last audit (if any) (July 2018-May 2019)

No.	Buyers Name	PalmTrace Trading License Number	RSPO Credits of Certified CPO Sold (mt)
1	Buyer 1	4213-67400	566
2	Buyer 2	4213-67394	410
3	Buyer 3	4213-67406	2024
Total			3,000

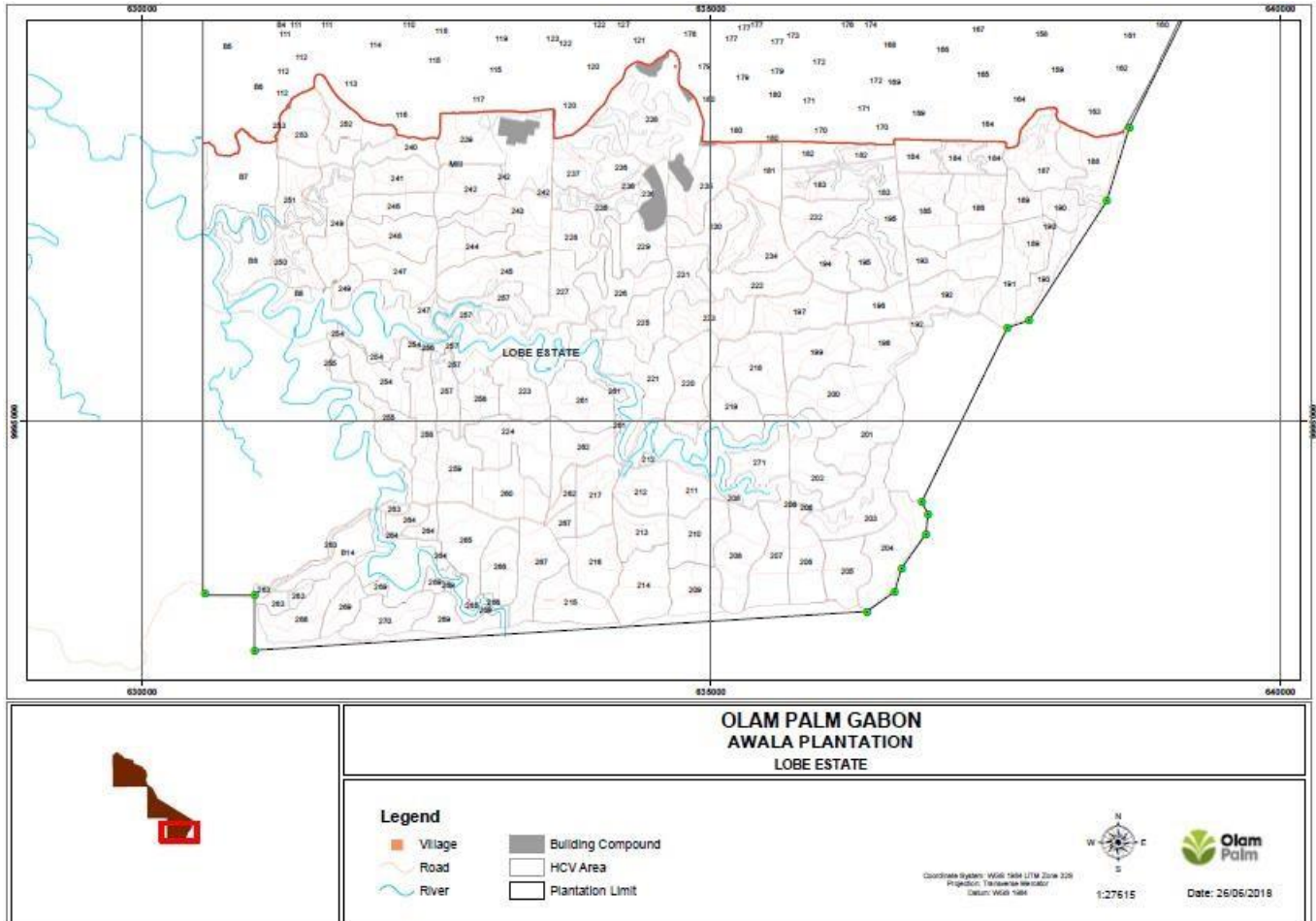
Appendix F: Location Map of Awala Palm Oil Mill Certification Unit and Supply bases



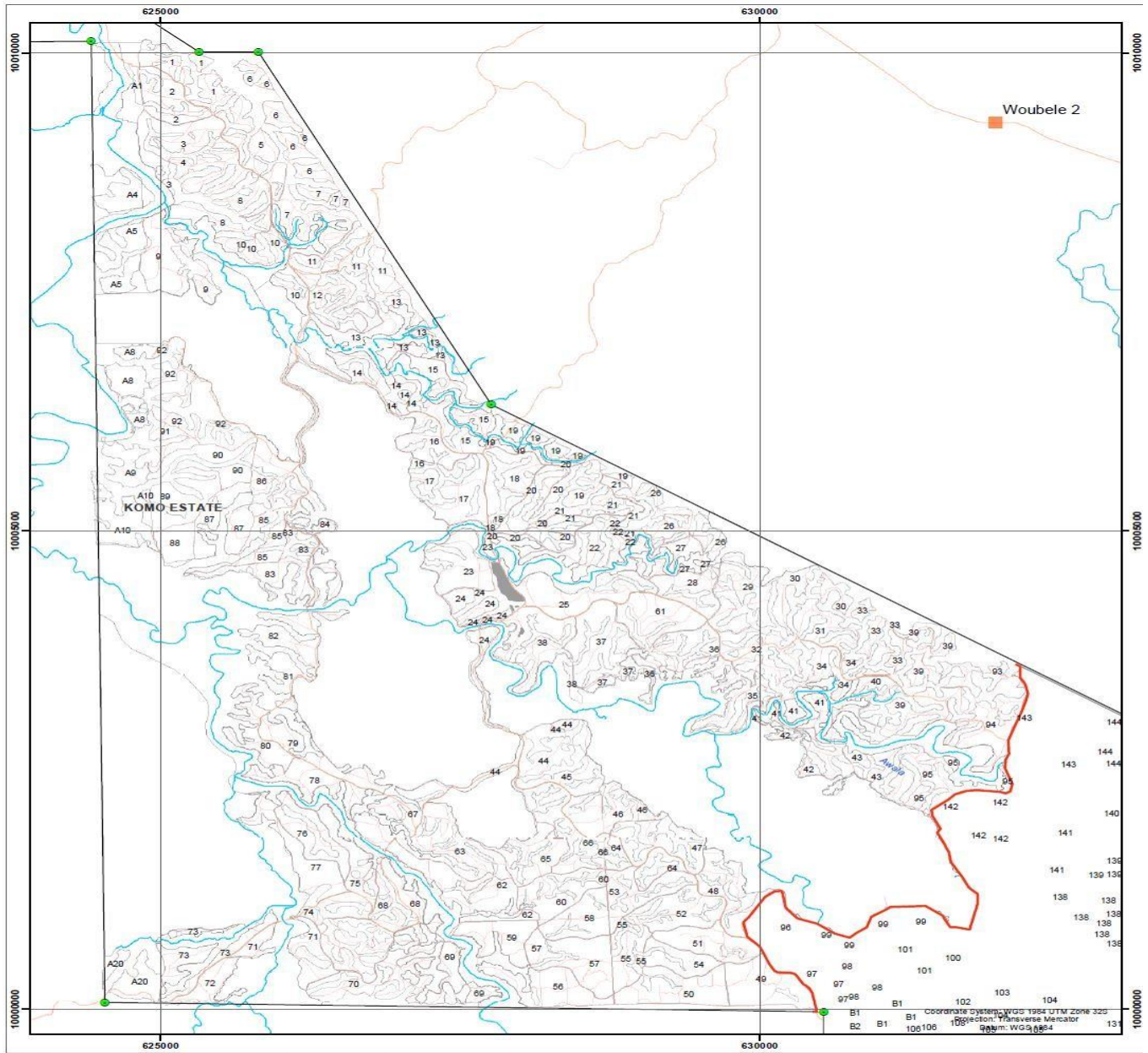
Appendix G: Bokoue Estate Field Map



Appendix H: Lobe Estate Field Map



Appendix I: Komo Estate Field Map

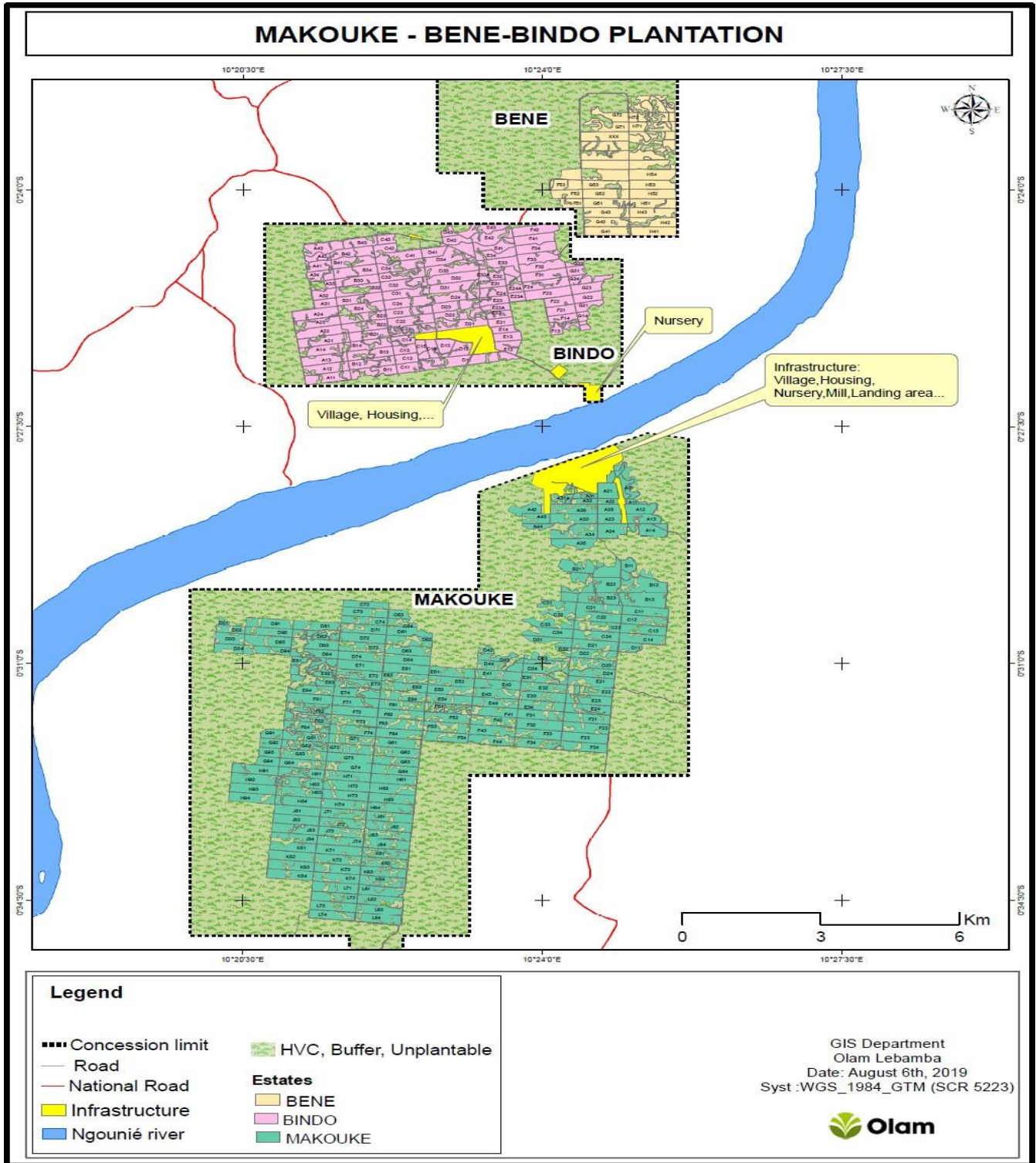


**OLAM PALM GABON
 AWALA PLANTATION
 KOMO ESTATE**

Legend			
Village	Building Compound	N W E S	
Road	HCV Area	1:32236	Date: 26/06/2018
River	Plantation Limit		

Coordinate system: WGS 1984 UTM zone 32S
 Projection: Transverse Mercator
 Datum: WGS 84
 Spheroid: GRS 1980
 Prime Meridian: 0°

Appendix J: Makouke and Bindo Field map (Bene is included as part of Bindo estate)



Appendix K: List of Abbreviations

a.i	Active Ingredient
BOD	Biochemical Oxygen Demand
CB	Certification Bodies
CHRA	Chemical Health Risk Assessment
COD	Chemical Oxygen Demand
CPO	Crude Palm Oil
CSPO	Certified Sustainable Palm Oil
CSPKO	Certified Sustainable Palm Kernel Oil
EFB	Empty Fruit Bunch
EHS	Environmental, Health and Safety
EIA	Environmental Impact Assessment
EMS	Environmental Management System
FFB	Fresh Fruit Bunch
FPIC	Free, Prior, Informed and Consent
GAP	Good Agricultural Practice
GHG	Greenhouse Gas
GMP	Good Manufacturing Practice
GPS	Global Positioning System
HCV	High Conservation Value
IPM	Integrated Pest Management
IP	Identity Preserved
IS - CSPO	Independent Smallholder Certified Sustainable Palm Oil
IS – CSPKO	Independent Smallholder Certified Sustainable Palm Kernel Oil
IS – CSPKE	Independent Smallholder Certified Sustainable Palm Kernel Expeller
ISCC	International Sustainable Carbon Certification
LD50	Lethal Dose for 50 sample
MB	Mass Balance
MSDS	Material Safety Data Sheet
MT	Metric Tonnes
OER	Oil Extraction Rate
OPG	Olam Palm Group
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