

**RSPO PRINCIPLE AND CRITERIA
PUBLIC SUMMARY REPORT**

- Initial Assessment**
- Annual Surveillance Assessment (1)**
- Recertification Assessment** (Choose an item.)
- Extension of Scope**

Parent Company SOCFIN SA
Parent Company Address: Square des Places 3, 1700 Fribourg - Switzerland
Certification Unit: Brabanta S.A. Brabanta Palm Oil Mill
Location of Certification Unit: Mapangu, Territoire d'Ilebo, Kinshasa, Kasai, Democratic Republic of the Congo
Date of Final Report: 18/06/2023

TABLE of CONTENTS

Page No

Section 1: Scope of the Assessment.....	3
1. Company Details	3
2. Certification Information	3
3. Other Certifications.....	4
4. Location(s) of Mill & Supply Bases	4
5. Description of Supply Base	4
6. Plantings & Cycle.....	5
7. Summary of Certified Tonnage of FFB (Own Certified Scope)	5
8. Summary of Certified Tonnage of FFB (from other certified unit(s)).....	5
9. Summary of Non-Certified Tonnage of FFB (outside supplier – excluded from certificate).....	6
10. Summary of Certified Tonnage (not applicable for ISS)	7
11. Summary of Actual Volume sold	8
12. Independent Smallholders Certified Tonnage / Volume	9
13. Independent Smallholders Actual Sold Tonnage / Volume	9
Section 2: Assessment Process	11
2.1 Assessment Methodology, Programme, Site Visits.....	11
2.2 BSI Assessment Team	12
2.3 Assessment Plan.....	15
Section 3: Assessment Findings	18
3.1 Multiple Management Units and Time Bound Plan.....	18
3.2 Progress of scheme smallholders and/or outgrowers.....	23
3.3 Details of Nonconformities	30
3.3.1 Status of Nonconformities Previously Identified and Observations.....	33
3.3.2 Summary of the Nonconformities and Status.....	70
3.4 Stakeholders and previous land owner / user consultation.....	71
3.5 Impartiality and conflict of interest	73
Formal Signing-off of Assessment Conclusion and Recommendation	73
Appendix A: Summary of Findings	74
Appendix B: GHG Reporting Executive Summary	148
Appendix C: Location Map of Certification Unit and Supply bases.....	150
Appendix D: Estate Field Map.....	151
Appendix E: List of Smallholder Registered and/or sampled	154
Appendix F: List of Abbreviations	155

Section 1: Scope of the Assessment

1. Company Details			
Parent Company	Socfin SA		
RSPO Membership Number	1-0269-19-000-00	Membership Approval Date	15/02/2019
Address	Square des Places 3, 1700 Fribourg - Switzerland		
Palm Oil Mill / Estate (Certification Unit)	Brabanta S.A. Brabanta Palm Oil Mill		
Location / Address	Mapangu, Territoire d'Ilebo, Kinshasa, Kasai, Democratic Republic of the Congo.		
Website	www.socfin.com		
Management Representative	Pascal DESMEDT	E-mail	pdesmedt@brabantacd.com
Telephone	+243991006501 +243829908222	Facsimile	-

2. Certification Information			
Certificate Number	RSPO 753137	Certificate Start Date	05/04/2022
Date of First Certification	05/04/2022	Certificate Expiry Date	04/04/2027
Scope of Certification	Production of Sustainable Crude Palm Oil (CPO) and Palm Kernel (PK)		
Visit Objectives	The objective of the assessment was to conduct the first annual surveillance assessment and look for positive evidence to ensure that elements of the scope of certification and the requirements of the management standard are effectively addressed by Brabanta Certification Unit's management system, and that the system is demonstrating the ability to support the achievement of statutory, regulatory and contractual requirements and the organisation's specified objectives.		
Assessment Cycle	<input type="checkbox"/> Pre-Assessment (Choose an item.) <input type="checkbox"/> Initial Assessment <input type="checkbox"/> Annual Surveillance Assessment (ASA 1) <input type="checkbox"/> Recertification Assessment (Choose an item.) <input type="checkbox"/> Scope Extension		
Applicable Standards / Normative Reference	RSPO Certification System for P&C and RSPO ISH 2020 <input checked="" type="checkbox"/> RSPO P&C 2018 for the Production of Sustainable Palm Oil <input type="checkbox"/> Choose an item. National Interpretation Choose an item. for RSPO P&C 2018 for the Production of Sustainable Palm Oil		
Supply Chain Module	<input type="checkbox"/> Identity Preserved; <input checked="" type="checkbox"/> Mass Balance	Mill Capacity	20 Mt/Hr
ISH certification Phase	<input type="checkbox"/> Eligibility; <input type="checkbox"/> Milestone A; <input type="checkbox"/> Milestone B; <input checked="" type="checkbox"/> Not Applicable		

RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

3. Other Certifications			
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
-	-	-	-

4. Location(s) of Mill & Supply Bases			
Name (Mill / Supply Base)	Location	GPS Coordinates	
		Latitude	Longitude
Brabanta Palm Oil Mill	Mapangu, Territoire d'Ilebo, Kasai, Democratic Republic of the Congo	04° 22' 36.11" S	20° 17' 22.95" E
Sanga Sanga Estate	Mapangu, Territoire d'Ilebo, Kasai, Democratic Republic of the Congo	04° 20' 45.76" S	20° 12' 12.79" E
Kadima Estate	Mapangu, Territoire d'Ilebo, Kasai, Democratic Republic of the Congo	04° 22' 58.14" S	20° 13' 45.76" E
Kanangai Estate	Mapangu, Territoire d'Ilebo, Kasai, Democratic Republic of the Congo	04° 23' 37.30" S	20° 18' 26.64" E

5. Description of Supply Base					
New Planting Development	<input checked="" type="checkbox"/> No (no change in total planted area)		<input type="checkbox"/> Yes (please refer to Principle 7 for details)		
Estate / Smallholders	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted
Sanga Sanga Estate	508.00	25.00	27.00	560.00	90.70
Kadima Estate	320.00	-	3.00	323.00	99.07
Kanangai Estate	503.00	-	123.00	626.00	80.35
Total	1,331.00	25.00	153.00	1509.00	88.20

Note: Changes in area of HCV and Infrastructure due to reclassification of HCV that were previously not identified. The reclassification done was based on the HCV Assessment report dated May 2020. The reclassification is mainly on the river buffer zones which have been reclassified as conservation areas instead.

RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

6. Plantings & Cycle						
Estate / Smallholders	Age (Years) - ha				Mature	Immature
	0 - 3	4 - 14	15 - 25	>25		
Sanga Sanga Estate	-	508.00	-	-	508.00	-
Kadima Estate	-	320.00	-	-	320.00	-
Kanangai Estate	-	503.00	-	-	503.00	-
Total (ha)	-	1,331.00	-	-	1,331.00	-

Note: Only Mature area is considered as production area

7. Summary of Certified Tonnage of FFB (Own Certified Scope)				
Estate / Smallholders	Tonnage (MT) / year			
	Estimated last year (April 22 – Mar 23)	Actual (April 2022 – Dec 2022)		Forecast (April 23 – Mar 24)
		Previous license period (-)	Current license period (April 22 – Dec 22)	
Sanga Sanga Estate	8,000.00	-	6,046.50	8,000.00
Kadima Estate	5,000.00	-	2,807.83	5,000.00
Kanangai Estate	8,000.00	-	7,161.33	8,000.00
Total	21,000.00	16,015.66		21,000.00

Note: Estimated period has been revised from Jan 2022-Dec 2022 to April 2022 to Mar 2023 to align with PalmTrace License Period which starts on 05 April 2022. Applies to table 8, 9, and 10 below.

8. Summary of Certified Tonnage of FFB (from other certified unit(s))				
Estate / Smallholders	Tonnage (MT) / year			
	Estimated last year (April 22 – Mar 23)	Actual (April 2022 – Dec 2022)		Forecast (April 23 – Mar 24)
		Previous license period (-)	Current license period (April 22 – Dec 22)	
NA		-	-	
Total		-		

RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

9. Summary of Non-Certified Tonnage of FFB (outside supplier – excluded from certificate)				
Out growers / smallholders	Tonnage (MT) / year			
	Estimated last year (April 22 – Mar 23)	Actual (April 2022 – Dec 2022)		Forecast (April 23 – Mar 24)
		Previous license period (-)	Current license period (April 22 – Dec 22)	
Lumbundji	55,000.00	-	30,792.48	40,000.00
Savannah	4,000.00	-	2,543.79	3,000.00
Collecteurs villageois de FFB	1,883.00	-	900.42	1,200.00
Total	60,883.00		34,236.69	44,200.00

9A. Monthly Records of Certified and Uncertified FFB Received since the last audit				
No.	Month - Year	Volume of FFB from certified supply base (mt)	Volume of FFB from uncertified supply base (mt)	Total FFB/Month (mt)
1	Apr 2022	489.10	943.40	1,432.50
2	May 2022	830.10	1,069.36	1,899.46
3	Jun 2022	1,671.76	2,731.74	4403.50
4	Jul 2022	2,869.42	5,588.20	8,457.62
5	Aug 2022	3,441.34	7,668.84	11,110.18
6	Sep 2022	3,094.48	6,807.60	9,902.08
7	Oct 2022	2,118.46	5,670.95	7,789.41
8	Nov 2022	1,076.74	3,069.00	4,145.74
9	Dec 2022	424.26	687.60	1,111.86
	TOTAL	16,015.66	34,236.69	50,252.35

RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

10. Summary of Certified Tonnage (MT) (not applicable for ISS)			
Estimated last year (April 22 – Mar 23)	Actual (April 2022 – Dec 2022)		Forecast (April 23 – Mar 24)
	Previous license period (-)	Current license period (April 22 – Dec 22)	
FFB	FFB		FFB
21,000.00 mt	-	16,015.66 mt	21,000.00 mt
	TOTAL	16,015.66 mt	
CPO (OER: 23.00 %)	CPO (OER: 25.37 %)		CPO (OER: 23.00 %)
4,830.00 mt	-	4,063.04 mt	4,830.00 mt
	TOTAL	4,063.04 mt	
PK (KER: -)	PK (KER: -)		PK (KER: -)
-	-	-	-
	TOTAL	-	

Note: Brabant POM does not process and sell. This is due to the low PK volume and high transportation cost, it is not economical to process and sell PK.

10A. Monthly Records of Certified CPO & PK since the last audit			
No.	Month - Year	Certified CPO (MT)	Certified PK (MT)
1	Apr 2022	127.20	-
2	May 2022	173.27	-
3	Jun 2022	384.59	-
4	Jul 2022	735.66	-
5	Aug 2022	854.23	-
6	Sep 2022	760.55	-
7	Oct 2022	618.31	-
8	Nov 2022	325.01	-
9	Dec 2022	84.22	-
TOTAL		4,063.04	-

RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

11. Summary of Actual Volume sold					
Current License period (April 2022 – Dec 2022)					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	Others		
CPO (MT)	-	-	-	1,002.19	1,002.19
PK (MT)	-	-	-	-	-
Credits	-	-	-	-	-
Previous License period (-)					
CPO (MT)	-	-	-	-	-
PK (MT)	-	-	-	-	-
Credits	-	-	-	-	-

Note: Conventional is RSPO certified material but sold as non-RSPO.

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

Note:

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

Note:

11C. Records of CPO & PK Sold as conventional since the last audit (if any)			
No.	Buyers Name	CPO Sold (MT)	PK Sold (MT)
1	XXX	1,002.19	-
TOTAL		1,002.19	-

Note:

RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

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

12. Independent Smallholders Certified Tonnage (MT) / Volume									
Phase	Estimated last year (Not Applicable)			Actual (Not Applicable)			Forecast (Not Applicable)		
	Eligibility	MS A	MS B	Eligibility	MS A	MS B	Eligibility	MS A	MS B
	40%	70%	100%	40%	70%	100%	40%	70%	100%
FFB			-			-			-
IS-CSPO	-	-		-	-		-	-	
IS-CSPKO	-	-		-	-		-	-	
IS-CSPKE	-	-		-	-		-	-	
CSPK	-	-		-	-		-	-	

12A. Monthly Records of Certified CPO, PK & PKE (equivalent) produced since the last audit						
No.	Month - Year	FFB (MT)	Certified CPO (MT)	Certified PK (MT)	Certified PKO (MT)	Certified PKE (MT)
-	-	-	-	-	-	-
TOTAL		N/A	N/A	N/A	N/A	N/A
Note:						

13. Independent Smallholders Actual Sold Tonnage / Volume							
	FFB	FFB Conventional	FFB Other schemes	IS-CSPO	CSPK	IS-CSPKO	IS-CSPKE
Current License period (Not Applicable)							
Credits				-	-	-	-
Physical	-	-	-				
Previous License period (Not Applicable)							
Credits				-	-	-	-
Physical	-	-	-				

RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

13A. Records of Certified FFB, CPO, PK & PKE (including credits) sold since the last audit							
No.	Buyers Name	PalmTrace Trading License Number	FFB Sold (MT)	Certified CPO Sold (MT/credit)	Certified PK Sold (MT/credit)	Certified PKO Sold (MT/credit)	Certified PKE Sold (MT/credit)
-	-	-	-	-	-	-	-
TOTAL			N/A	N/A	N/A	N/A	N/A
Note:							

Section 2: Assessment Process

Certification Body:

BSI Services Malaysia Sdn. Bhd. (ASI Accreditation Number: ASI-ACC-067)

Suite 29.01 Level 29, The Gardens North Tower,

Mid Valley City, Lingkaran Syed Putra,

59200 Kuala Lumpur, Malaysia.

Tel +60 (3) 9212 9638; Fax +60 (3) 9212 9639

Representative: Dr. Chaiyaporn Seekao (Chaiyaporn.Seekao@bsigroup.com)

Website: www.bsigroup.com

BSI is a leading global provider of management systems assessment and certification, with more than 92,000 certified locations and clients in over 193 countries. BSI is the UK's National Standards Body. BSI provides independent, third-party certification of management systems. BSI is ASI Accredited (ASI-ACC-067) to conduct RSPO assessment since 31/10/2014 with accredited office located at Kuala Lumpur, Malaysia.

2.1 Assessment Methodology, Programme, Site Visits

The on-site assessment was conducted on **06/01/2023 – 11/01/2023**. The audit programme is included as Section 2.3.

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

The Critical NC close out on-site assessment was conducted on **30/03/2023**. The audit programs are included in Section 2.3. The assessment was conducted by Team Leader (Vijay Kanna Pakirisamy) remotely and Team Member (John Takang) on-site. The team leader joined the verification review via Microsoft Teams. Prior to the verification, the certification unit have provided all relevant documents in relation to the correction and corrective actions that they have implemented. The assessment was conducted to further affirm the implementation of the CAP and conduct physical site verification and stakeholder interviews.

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. RSPO P&C 2018 for Production of Sustainable Palm Oil was used as the normative reference to assess compliance. The comments made by external stakeholders were also taken into account in the assessment.

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

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

Structured worker interviews with male and female workers and staff were held in private at the workplace in the mill and the estates. Fieldworkers were interviewed informally in small groups in the field. In addition, the wives of workers and staff were interviewed in informal group meetings at their housing. Separate visits were made to each

RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

of the local communities to meet with the village head and residents. Company officials were not present at any of the internal or external stakeholder interviews. A list of Stakeholders contacted is included as Section 3.4.

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

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

For Initial, Re-certification and Extension of Scope assessment, the report was externally reviewed by approved external peer reviewer prior to certification decision by BSI.

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

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

Assessment Program					
Name (Mill / Supply Base)	Year 1 (Certification)	Year 2 (ASA 1)	Year 3 (ASA 2)	Year 4 (ASA 3)	Year 5 (ASA 4)
Brabanta Palm Oil Mill	✓	✓	✓	✓	✓
Sanga Sanga Estate	✓	✓	✓	✓	✓
Kadima Estate	✓	✓	✓	✓	✓
Kanangai Estate	✓	✓	✓	✓	✓

Tentative Date of Next Visit: January 8, 2024 - January 11, 2024

Total Number of Mandays: 12 Mandays

2.2 BSI Assessment Team

Name	Role	Competency
Vijay Kanna Pakirisamy (VKP)	Team Leader	<p>Education: Holds a Bachelor’s Degree in Agribusiness Science Management with Honours from University Utara Malaysia in 2010.</p> <p>Work Experience: He gained his working exposure in the plantation sector, serving as an Assistant Manager with KL Kepong and IOI Plantations and as a Sr. Assistant Manager with United Plantations Berhad prior to joining BSI as a Client Manager.</p> <p>Training attended: He has completed ISO IMS 9001, 14001, 45001(OHS 18001) Lead Auditor Course, Endorsed RSPO P&C Lead Auditor Course, Endorsed RSPO SCCS Lead Auditor Course, Endorsed MSPO Lead Auditor Course, SMETA Requirements Training in April 2021, Introductory Course for HCV/HCS Requirements in Oil Palm Plantation, Endorsed Independent Smallholder Standard Training and Endorsed RSPO Refresher Courses,</p> <p>Aspect covered in this audit: During this assessment, he assessed on the aspects of Occupation Health Safety requirement, HIRARC, training, GAP and RSPO supply chain requirements.</p> <p>Language proficiency: He is fluent in English language.</p>

RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

<p>Dennis Yaw Acquah (DYA)</p>	<p>Team Member</p>	<p>Education: Holds a Bachelor of Science in Natural Resource management with specialization in Forestry from Kwame Nkrumah University of Science and technology, Kumasi, Ghana; Master of Science in logistic and Supply Chain Management from Kwame Nkrumah University of Science and technology, Kumasi, Ghana.</p> <p>Work Experience: He is currently works as a Project Coordinator (Forest and Biodiversity). Also experienced in implementing forest governance project, building relations, and sustaining communications with forest communities, acting as resource person for awareness and training activities and engaging government towards policy reforms. He has 14 years of experience as an Operation Managers having worked with two of the leading timber processing industries in Ghana.</p> <p>Training attended: He has successfully completed the Endorsed RSPO P&C 2018 Lead Auditor Course; Endorsed RSPO SCCS Lead Auditor Course, SA 8000, ISO 9001, ISO 45001, FSC Forest management/CoC Lead Auditor Course, Rainforest Alliance Sustainable Agriculture Standard (RA SAS) Farm/CoC Lead Auditor Course. Have has also participated in ESIA and SEA trainings</p> <p>Aspect covered in this audit: During this assessment, he assessed on the aspects of legal, social, and stakeholder engagement.</p> <p>Language proficiency: He is fluent in English language.</p>
<p>John Manyitabot Takang (JMT)</p>	<p>Team Member</p>	<p>Education: Holds a Bachelor of Science in Environmental and Resource Management and Master of Science in Environmental Sciences from the University of Cologne, specializing in environmental law and governance.</p> <p>Work Experience: He was a Resident Scholar at the United Nations University’s International Human Dimensions Programme on Global Environmental Change (UNU-IHDP) in Bonn-Germany. John has also served at the International Forest Policy Unit, in the Department of Natural Resources Governance and Climate Change of the German Technical Cooperation (GIZ). He was the Academic Officer of the International Master of Environmental Sciences (IMES) Programme at the University of Cologne, where he equally taught classes in international environmental law. Additionally, he has taught classes in international environmental law in the Technology and Resources Management master study programme offered at the Institute for Technology and Resources Management in the Tropics and Subtropics of Cologne University of Applied Sciences. John is involved in a number of governance initiatives. Among others, he is a Fellow of the African Good Governance Network (AGGN). Since 2011, he is founding Executive Director of the Environmental Governance Institute (EGI), where he is engaging in the conception and implementation of a wide range of projects including, policy, development, renewable energies, sustainable agriculture among other.</p> <p>Training attended: He has successfully completed the Endorsed RSPO P&C 2018 Lead Auditor Course, ISO 14001:2015 Lead Auditor Course (attended), RSPO Smallholder Academy (Partner to the Academy) and training in HCV/HCS.</p> <p>Aspect covered in this audit: Best Management Practice for Mill and Estate, environment aspect, GHG & HCV, continuous improvement</p> <p>Language proficiency: He is fluent in English and French language..</p>

RSPO P&C Public Summary Report
Revision 14 (Aug 2022)**Accompanying Persons:**

Name	Role
Philippe Ndjoko (PN)	<p>Education: Holds a Diploma in English Studies from Universitaire de I'ISP, Illebo, DRC.</p> <p>Work Experience: He is a Professor of English Studies at the Institute of Professional Studies of Mapangu.</p> <p>Training attended: -</p> <p>Aspect covered in this audit: During this assessment, he was the Local and French Translator.</p> <p>Language proficiency: He is fluent in English and French language.</p>

2.3 Assessment Plan

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

Date	Time	Subjects	VKP	DYA	JMT	PN
Thursday, 05/01/2023	-	Auditors arrive in Kinshasa, DRC and travel to Mapangu.	✓	✓	✓	✓
Friday, 06/01/2023	0800 - 0830	Opening Meeting: - Opening Presentation by Audit Team Leader. - Confirmation of assessment scope and finalize Audit plan (including stakeholder's consultation).	✓	✓	✓	✓
	0830 - 1200	Kanangai Estate Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, waste management, worker housing, clinic, Landfill etc.	✓	✓	✓	✓
	1200 - 1300	LUNCH BREAK	✓	✓	✓	✓
	1300 - 1600	Document review P1 – P7: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, new planting, CIP and implementation & etc.)	✓	✓	✓	✓
	1600 - 1630	Interim Closing Briefing	✓	✓	✓	✓
Saturday, 07/01/2023	-	Rest Day	✓	✓	✓	✓
Sunday, 08/01/2023	-	Rest Day	✓	✓	✓	✓
Monday, 09/01/2023	0800 - 1200	Brabanta POM Inspection: FFB receiving, warehouse, workshop, wastes management & Landfill, Effluent Ponds, OSH & ERP, Environment issues, POME application, water treatment. Laboratory, weighbridge and palm product storage area, staff, workers and contractor interview, housing and facility inspection, clinic, Lab, weighbridge and palm product storage area, etc.	✓	✓	✓	✓
	1000 - 1200	Meeting with stakeholders (Government, village rep, smallholders, Union Leader, contractor etc.)	-	-	✓	✓
	1200 - 1300	LUNCH BREAK	✓	✓	✓	✓

Date	Time	Subjects	VKP	DYA	JMT	PN
	1300 - 1600	Document review P1 – P7: Document Review P1 – P7: SOPs, Review on SEIA documents and records, wage records, employee data, training records, legal permits, mill inspection and internal monitoring records, CIP & implementation. RSPO SCCS general requirements, internal audit, management review, sales and purchasing documents, mass balance accounting and other relevant documents and records	✓	✓	✓	✓
	1600 - 1630	Interim Closing Briefing	✓	✓	✓	✓
Tuesday, 10/01/2023	0800 - 1200	Kadima Estate Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, waste management, worker housing, clinic, Landfill etc.	✓	✓	✓	✓
	1200 - 1300	LUNCH BREAK	✓	✓	✓	✓
	1300 - 1600	Document review P1 – P7: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, newplanting, CIP and implementation & etc.)	✓	✓	✓	✓
	1600 - 1630	Interim Closing Briefing	✓	✓	✓	✓
Wednesday, 11/01/2023	0800 - 1200	Sanga Sanga Estate Field visit, boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation, OSH & ERP, workshop, storage area (agrochemical, fertilizer, lubricant etc), agrochemical mixing area, waste management, worker housing, clinic, Landfill etc.	✓	✓	✓	✓
	1200 - 1300	LUNCH BREAK	✓	✓	✓	✓
	1300 - 1530	Document review P1 – P7: (General Documentation e.g. Legal, Manual and Procedure, production & monitoring records, IPM & HCV records, SEIA documents & records, OSH records, review pay documents, records of communication with stakeholder/workers representatives, newplanting, CIP and implementation & etc.)	✓	✓	✓	✓
	1530 - 1600	Verify any Outstanding Issues and Preparation for Closing Meeting	✓	✓	✓	✓
	1600 - 1630	Closing Meeting	✓	✓	✓	✓
Thursday, 12/01/2023	-	Auditors travel back to Kinshasa, DRC.	✓	✓	✓	-

RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

Assessment Plan – Critical Non-Conformity (On-Site & Remote) Verification.

Date	Time	Subjects	VKP (Remote)	JMT (Onsite)
Thursday, 30/03/2023	0900 – 0930	Opening Meeting at Brabanta POM : - Opening Presentation by Verification Audit - Team Leader. - Confirmation of assessment scope and finalize Audit plan	✓ Microsoft Team & Whatsapp)	✓
	0930 – 1230	1. Verification on Critical NC: <ul style="list-style-type: none"> • 2299249-202301-M1 • 2299249-202301-M2 2. Site observation & stakeholder interview. 3. Document review – implemented evidence		
	1230 – 1300	Closing Meeting		

Section 3: Assessment Findings

3.1 Multiple Management Units and Time Bound Plan

Requirement	Assessment	Compliance
Does the time bound plan include all current subsidiaries, estates and mills that is under the control and/or minor shareholding of the holding company?	Yes. The timebound plan for Socfin SA has listed all estates and mills under their management.	Complied
Have all the estates and mills certified within five (5) years after obtaining RSPO membership? If no, has RSPO Secretariat approval obtained? Was the submission according to the template as announced by the RSPO Secretariat on 21/12/2021	PT. Socfin Indonesia have been an RSPO members since 6 December 2004. All management unit under the original PT. Socfin Indonesia Group has been RSPO certified. PT. Socfin Indonesia merge under Socfin SA since 15 February 2019 whereby grouping all Indonesian and African oil palm operations under one membership number. Socfin SA only becomes RSPO Member on 15 February 2019. RSPO approved on Socfin SA timebound plan extension up to 31 December 2023 – dated 15 June 2023.	Complied
Have there been any new acquisitions? If yes, the new acquisitions shall be certified within three (3) years from the date of acquisition. Certification plan for the new acquisition shall be available. If no, has RSPO Secretariat approval obtained? Was the submission according to the template as announced by the RSPO Secretariat on 21/12/2021.	No. There are new acquisitions since membership.	Complied
Any deviations from the maximum periods requires approval by the RSPO Secretariat.	No. Socfin SA has obtained an extension on the TBP up till 31 December 2023 to ensure all operating units to be RSPO Certified. The revised TBP has been approved by RSPO on 15/06/2023.	Complied
Have there been any changes to the time-bound plan since the last audit (both new acquisition and existing)? If yes, justification is required. Is this consistent with the ACOP reporting?	Yes. Socfin SA has obtained an extension on the TBP up till 31 December 2023 to ensure all operating units to be RSPO Certified. The revised TBP has been approved by RSPO on 15/06/2023.	Complied
Have there been any isolated lapses in implementation of the plan? If yes a Minor non-compliance shall be raised	There is no isolated lapse in implementation of the plan. Socfin SA has obtained an extension on the TBP up till 31 December 2023 to ensure all operating units to be RSPO Certified. The revised TBP has been approved by RSPO on 15/06/2023.	Complied
Have there been any fundamental failure (e.g. unable to justify delay in planning the	No. There is no fundamental failure. Socfin SA has obtained an extension on the TBP up till 31 December	Complied

RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

<p>assessments) to proceed with implementation of the plan? If yes a Major non-compliance shall be raised</p>	<p>2023 to ensure all operating units to be RSPO Certified. The revised TBP has been approved by RSPO on 15/06/2023.</p>	
<p>Un-Certified Units or Holdings</p>		
<p>No replacement of primary forest or any area required to maintain or enhance HCVs and HCS in accordance with RSPO P&C criterion 7.12.</p>	<p>Socfin SA have submitted LUCA for review of all uncertified unit to RSPO Secretariat on 13 December 2017. Later, Socfin SA submitted revision on 8 September 2018. The decision on replacement after 2005 for primary forest and/or area required to maintain or enhance HCV in accordance to RSPO P&C criterion – awaiting LUCA review from RSPO.</p> <p>Based on review to RSPO RaCP Tracker for Socfin SA (October 2022), audit team noted: 9 management units with potential liability; 9 management units with LUCA submitted; 9 management units with LUCA review completed; 8 management units with Concept Notes required; 6 management units with Concept Note submitted; 3 management units with Concept Note approved; 2 management unit with Compensation Plan submitted; 2 management units with Compensation Plan endorsed; 7 management units with Remediation Plan required; 3 management unit with Remediation Plan submitted; 2 management unit with Remediation Plan approved.</p> <p>Latest update:</p> <p>Okomu: LUCA approved by RSPO on 22 June 2021.</p> <p>Safacam: LUCA approved by RSPO on 4 February 2021. RSPO finalized Annex 7 Concept Note in 12 May 2021. Annex 7 Concept Note validated by Compensation Panel 16 August 2021. RSPO approved the Annex 8 remediation and compensation plan on 8 September 2022.</p> <p>Socapalm Kienke: LUCA approved in December 2021.</p> <p>Brabanta: LUCA for all Brabanta was approved by RSPO on 22 October 2021. RaCP: Annex 7 was approved on 23 August 2022. Brabanta and Socfin are now drafting Annex 8.</p> <p>Plantations Socfinaf Ghana (PSG): LUCA for PSG Manso MU submitted 26 May 2021. Approved on 7 October 2022.</p> <p>SoGB: LUCA for all SoGB submitted 22 July 2020. Approved LUCA by RSPO on 6 October 2020. RaCP submitted Annex 8 Remediation Plan on 9 July 2021. Approved on 19 May 2022.</p> <p>Agripalma: LUCA for Titulo 410 was approved on 8 November 2021. RaCP: The Annex 7 for Agripalma Titulo 410 was approved on 7 October 2022. SOCFIN and Agripalma now drafting Annex 8.</p>	<p>Complied</p>

RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

<p>Any new plantings since January 1st, 2010 shall comply with the RSPO New Plantings Procedure.</p>	<p>PT. Socfin Indonesia made New Planting Procedure Public Notification on 16 February 2017. After 30 days, there was no comment received by RSPO secretariat. Link https://www.rspo.org/certification/new_planting-procedure/public_consultations/socfin-group-pt-socfindo-and_socfinco-sa-pt-socfin-indonesia--lima-puluh_estate</p> <p>Based on review to RSPO RaCP Tracker for Socfin SA (October 2022), audit team noted: 9 management units with potential liability; 9 management units with LUCA submitted; 9 management units with LUCA review completed; 8 management units with Concept Notes required; 6 management units with Concept Note submitted; 3 management units with Concept Note approved; 2 management unit with Compensation Plan submitted; 2 management units with Compensation Plan endorsed; 7 management units with Remediation Plan required; 3 management unit with Remediation Plan submitted; 2 management unit with Remediation Plan approved.</p>	<p>Complied</p>
<p>Any Land conflicts are being resolved through a mutually agreed process, such as RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO P&C criteria 4.4, 4.5, 4.6, 4.7 and 4.8.</p>	<p>Based on review to RSPO RaCP Tracker for Socfin SA (October 2022), audit team noted: 9 management units with potential liability; 9 management units with LUCA submitted; 9 management units with LUCA review completed; 8 management units with Concept Notes required; 6 management units with Concept Note submitted; 3 management units with Concept Note approved; 2 management unit with Compensation Plan submitted; 2 management units with Compensation Plan endorsed; 7 management units with Remediation Plan required; 3 management unit with Remediation Plan submitted; 2 management unit with Remediation Plan approved.</p>	<p>Complied</p>
<p>Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 4.2</p>	<p>The labour and land dispute reported in the African Operation, published on January 2020 and January 2021; have been addressed as informed in RSPO website dated 21 June 2022. Related link: RSPO CONCLUDES VERIFICATION ASSESSMENT AT SOCAPALM - Roundtable on Sustainable Palm Oil (RSPO)</p> <p>SOCAPALM is required to undertake remediation and mitigation measures for each breach, and to submit a quarterly progress report to the RSPO Compliance Subdivision on the measures taken.</p>	<p>Complied</p>
<p>Any Legal non-compliance is being addressed through measures consistent with the requirements of RSPO P&C criteria 2.1</p>	<p>Based on audit and based on review upon RSPO Case Tracker (https://askrspo.force.com/Complaint/s/casetracker)</p>	<p>Complied</p>

RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

	<p>in October 2022, there is no legal non-compliance reported for Socfin SA and its subsidiary. Based on internal audit reports for uncertified unit, there is no legal non-compliance.</p>	
<p>Did the company conduct internal audit for those uncertified estates against the uncertified management units requirement and covering the RSPO P&C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12? If yes, a positive assurance statement shall be available and justified.</p>	<p>Yes. Socfin SA manages and monitors internal audit for uncertified management units. The internal audit covers RSPO P&C 2018 (Generic) and relevant RSPO P&C Certifications System June 2020. Internal audit reports covered RSPO P&C criterion 2.1, 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12.</p> <ul style="list-style-type: none"> • Internal audit for Agripalma (Sao Tome) carried out January 2021. • Internal audit for Brabanta SA (Democratic Republic of Congo) carried out April 2021. • Internal audit for Okomu Oil Palm Company PLC – Extension 1 (Nigeria) carried out February 2021. • Internal audit for Plantations Socfinaf Ghana (PSG) Subri Management Units (Ghana) carried out May 2021. • Internal audit for SAFACAM TF151 (Cameroon) carried out June-July 2021. • Internal audit for Socapalm ESEKA (Cameroon) carried out June 2021. • Internal audit for La Société des Caoutchoucs de Grand Béréby (SoGB) carried out August 2021. <p>Positive assurance: Socfin SA committed to fulfill all the requirement related to RSPO certification process. Socfin SA has detailed the correction and corrective action plan and any unresolved issues has been on the right path towards the certification process. The company keeps track of its compliance per P&C on a regular basis, last update is on 10 October 2022. The company gave a positive assurance statement as “Internal audits are, at our level, tools for continuous improvement. We have opted for a simple presentation of the discrepancies found during the audit. Positive statements provided by the auditors are included in the presentation of the internal and external audits findings inside the annual management review”.</p>	<p>Complied</p>
<p>Are there any Critical (Major) non-compliance raised against any of the RSPO P&C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12 during the last internal audit of the uncertified estates? If yes is the NC(s) actively addressed with RSPO?</p>	<p>Yes. The Critical (Major) non-compliance was issued related to RSPO P&C criterion 7.12. The management units prepared corrective action in form of carried out HCV assessment and Land Use Change Analysis to RSPO Secretariat.</p> <ul style="list-style-type: none"> • Agripalma finalized an HCV assessment of their whole concession in November 2020, with the 	<p>Complied</p>

RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

	<p>field visit happening in October 2020. The LUCA for Titulo 410 was approved on the 8 November 2021. The Annex 7 for Agripalma Titulo 410 was approved on the 7 of October 2022. Socfin and Agripalma are now drafting the Annex 8.</p> <ul style="list-style-type: none"> • Brabanta finalized an HCV assessment of their whole concession in September 2020, with the field visit happening in November 2019. Two Annex 2's were submitted: one for Sanga Sanga, Kadima and Kanangai, and one for Lumbundji and Savannah. The LUCA for Brabanta was approved on 22 October 2021. The Annex 7 of Brabanta was approved on the 23 August 2022. Brabanta and Socfin are now drafting the Annex 8. • Okomu Extension 1 finalized a HCV assessment in January 2016, with the field visit happening in September 2015. This was approved by the HCV RN. The LUCA for Okomu Extension 1 was submitted on the 3 of March 2021 and was approved by RSPO on 22 June 2021. The Annex 7 concept note was approved by the RSPO compensation panel on the 7 October 2022. Okomu and Socfin are now drafting the Annex 8. • PSG conducted an HCV assessment in 2017 on several prospected lands within the concession. This was validated by the HCV RN on 6 December 2017. PSG finalized an HCV assessment of their whole concession in July 2021, with the field visit happening in November 2020 and follow-up engagement visits with all stakeholders in February 2021. A LUCA has been conducted for the Manso MU and was approved on the 7 October 2022. The LUCA of the Subri MU will follow soon. • Safacam finalized an HCV assessment of their whole concession in January 2020, with the field visit happening in December 2018. Safacam submitted a LUCA for its full concession on the 5 August 2020 were replanting of plantings done before 2005. The LUCA was approved on the 4 February 2021. RSPO approved the Annex 8 remediation and compensation plan on 8 September 2022. <p>SOGB finalized a HCV assessment in February 2020, with the field visit happening in November 2019. SOGB conducted a LUCA for its whole concession, submitted on the 22 July 2020 and was approved by RSPO on the 6 October 2020. The Annex 8 remediation plan was approved on 19 May 2022.</p>	
--	----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--

RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

<p>Have there been any stakeholder (including NGO) consultation conducted?</p>	<p>Yes. Stakeholder consultation carried out in uncertified management unit.</p> <p>Social Impact Assessment (SIA) report recorded the stakeholder consultation process for villages near Agripalma (Sao Tome): for Emolve village in 21 March 2011, Vila Clotilde in 15 March 2011, Ribeira Piexe in 15 March 2011, Monte Mario in 8 August 2011, Praia Pesqueira in 15 March 2011, Lo Grande in 15 March 2011, Healthcare NGO (AMI) in 28 February 2011, Women group in 14 March 2011, FPIC meeting in Safacam (Cameroon) for Chefferie de Dikola in 7 December 2010, for Chefferie de Koungue in 11 September 2011.</p> <p>Sao Tome Agripalma Retrocession FPIC report June 2021_Final.</p> <p>FPIC 2014 PSG and Manso Chief, Elders and Farmers_New. FPIC 2017 PSG Estate Land Negotiations with Dabaose. MOU 2019 PSG and Tufuhene of Dabaose.</p>	<p>Complied</p>
--------------------------------------------------------------------------------	---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-----------------

3.2 Progress of scheme smallholders and/or outgrowers

<p>Progress of scheme smallholders or outgrowers towards compliance with relevant standards</p>		
<p>Requirement</p>	<p>Remarks</p>	<p>Compliance</p>
<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>	<p>There are no Scheme Smallholders within the Brabanta Certification Unit.</p>	<p>Complied</p>

Approved Time Bound Plan

Name of the Unit of Certification (UoC)	Country	Name of the Mills and Supply Bases	Location Address	GPS Coordinates		Total Managed Area (Ha)	Certification Status (Certified / Not certified)	Plan Year for Certification	Actual Certification Year	Date of Last TBP Verified and Approved by CB	REVISION OF THE TBP			
				Latitude	Longitude						Any revision from the last approved TBP?	New Proposed Year for Certification	Justification of changes for each UoC	Date of approval from RSPO
PT Socfin Indonesia - Tanah Gambus	Indonesia	Tanah Gambu Mill	Tanah Gambus Village, Lima Puluh Sub-district, Batubara District, North Sumatera Province, Indonesia	3° 12' 14.00" N	99° 24' 16.00" E	-	Certified	2011	2011		No			
		Tanah Gambu Estate		3° 10' 15.18" N	99° 23' 07.00" E	4974.29	Certified	2011	2011		No			
PT Socfin Indonesia - Bangun Bandar	Indonesia	Bangun Bandar Mill	Arus Panjang Village, Dolok Masihul Subdistrict, Serdang Bedagai District, North Sumatera Province, Indonesia	3° 19' 54.00" N	99° 02' 36.00" E	-	Certified	2011	2011		No			
		Bangun Bandar Estate		3° 16' 24.46" N	99° 57' 58.70" E	4146.85	Certified	2011	2011		No			
PT Socfin Indonesia - Negeri Lama	Indonesia	Negeri Lama Mill	Desa Negeri Lama, Kecamatan Bilah Hilir, Kabupaten Labuhan Batu, 21471, Sumatera Utara, Indonesia	2° 19' 02.00" N	100° 04' 13.00" E	-	Certified	2014	2014		No			
		Negeri Lama Estate		2° 19' 02.00" N	100° 04' 13.00" E	2164.8	Certified	2014	2014		No			
PT Socfin Indonesia - Mata Pao	Indonesia	Mata Pao Mill	Mata Pao Village, Subdistrict of Teluk Mengkudu, Serdang Bedagai Regency 20995 North Sumatera Province, Indonesia	3° 31' 51.00" N	99° 05' 31.00" E	-	Certified	2014	2014		No			
		Mata Pao Estate		3° 31' 51.00" N	99° 05' 31.00" E	2463.05	Certified	2014	2014		No			

RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

PT Socfin Indonesia - Sungai Liput	Indonesia	Sungai Liput Mill	Sungai Liput Village, Kejuruan Muda Sub District, Aceh Tamiang District, Aceh Province, Indonesia	4° 13' 55.00" N	98° 03' 34.00" E	-	Certified	2014	2014		No			
		Sungai Liput Estate		4° 13' 55.00" N	98° 03' 34.00" E	3841.96	Certified	2014	2014		No			
PT Socfin Indonesia - Aek Loba	Indonesia	Aek Loba Mill	Aek Kuasan Sub-district, Asahan District, North Sumatera Province, Indonesia	3° 39' 06.00" N	99° 37' 04.00" E	-	Certified	2015	2015		No			
		Aek Loba Estate		3° 39' 06.00" N	99° 37' 04.00" E	9673.86	Certified	2015	2015		No			
PT Socfin Indonesia – Seumanyam	Indonesia	Seumanyam Mill	Simpang Deli Kilang Village, Darul Makmur Utara Sub District, Nagan Raya District, Aceh Province, Indonesia	3° 57' 55.00" N	96° 33' 55.00" E	-	Certified	2015	2015		No			
		Seumanyam Estate		3° 57' 58.00" N	99° 33' 48.00" E	4446.63	Certified	2015	2015		No			
PT Socfin Indonesia – Seunagan	Indonesia	Seunagan Mill	Desa Purwodadi, Kecamatan Kuala Pesisir, Nagan Raya 23661, Aceh, Indonesia	4° 03' 36.00" N	96° 15' 44.00" E	-	Certified	2015	2015		No			
		Seunagan Estate		4° 03' 36.00" N	96° 15' 44.00" E	4505.59	Certified	2015	2015		No			
PT Socfin Indonesia - Lae Butar	Indonesia	Lae Butar Mill	Desa Rimo, Kecamatan Gunung Meriah, Kabupaten Aceh Singkil, Aceh 24784 Indonesia	2° 23' 28.00" N	97° 57' 24.00" E	-	Certified	2015	2015		No			
		Lae Butar Estate		2° 23' 28.00" N	97° 57' 24.00" E	4727.4	Certified	2015	2015		No			
Okomu Oil Palm Company Main Estate and Extension 1	Nigeria	Okomu Oil Palm Company Main Estate and Extension 1 Mill	Okomu-Udo, Ovia Southwest Local Government Area, Benin, Edo, Nigeria	6° 23' 31.23"N	5° 12' 40.37"E	-	Certified	2019	2020		No			
		Okomu Oil Palm		Okomu-Udo, Ovia Southwest Local	6° 23' 31.23"N	5° 12' 40.37" E	15578.45	Certified	2019	2020		No		

RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

		Company Main Estate	Government Area, Benin, Edo, Nigeria											
		Okomu Oil Palm Company Extension 1 Estate	Okomu-Udo, Ovia Southwest Local Government Area, Benin, Edo, Nigeria	6° 20' 57.57" N	5° 23' 12.13" E	4154	Not Certified	2023			Yes	end 2023	Change of timing due to RaCP validation process	15-Jun-23
Okomu Oil Palm Company Extension 2	Nigeria	Okomu Oil Palm Company Extension 2 Mill	Ovia-Northwest and Uhhnmwode Local Government Areas, Edo State, Nigeria	6° 42' 11.25" N	5° 49' 04.84" E	-	Not Certified	2023			Yes	end 2023	Change of timing due to RaCP validation process	15-Jun-23
		Okomu Oil Palm Company Extension 2 Estate		6° 42' 11.25" N	5° 49' 04.84" E	11416	Not Certified	2023			Yes	end 2023	Change of timing due to RaCP validation process	15-Jun-23
Socfin Agricultural Company (SL) Limited (SAC)	Sierra Leone	SAC Mill	SAC Plantation, NA, Sahn Malen, Pujehun District, Sierra Leone	7° 26' 16.65" N	11° 53' 22.17" W	-	Certified	2020	2021		No			
		SAC Estate		7° 28' 49.00" N	11° 49' 32.00" W	18473	Certified	2020	2021		No			
Société Africaine Forestière et Agricole du Cameroun (Safacam)	Cameroon	Safacam Mill	Littoral Region, Department of the Sanaga Maritime, Dizangué District, near the city of Edéa, Cameroon	3° 44' 20.75" N	9° 59' 25.99" E	-	Certified	2020	2020		No			
		Safacam TF129, TF136, TF180, TF, Bail Ossa		3° 44' 20.75" N	9° 59' 25.99" E	3992.84	Certified	2020	2020		No			
		Safacam TF151		3° 44' 16.60" N	9° 57' 58.50" E	11403	Certified	2022	2023		No			
		Safacam Provisional Concession		3° 46' 57.10" N	9° 56' 30.40" E	2161.06	Not Certified	2023			Yes	end 2023	Change of timing due to administrative reasons (request)	15-Jun-23

RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

														for extension of land lease period)
La Société des Caoutchoucs de Grand Béréby (SoGB)	Côte D'Ivoire	SOGB Mill	Grand Béréby, Région de Basassandra, Côte d'Ivoire	4° 41' 20.00" N	7° 5' 27.00" W	-	Certified	2020	2021		No			
		SOGB TF464		4° 41' 20.00" N	7° 5' 27.00" W	6096	Certified	2020	2021		No			
		SOGB TF465, TF466, TF467		4° 35' 3.26" N	7° 6' 8.60" W	28643	Certified	2022	2023		No			
Société Camerounaise de Palmeraies (Socapalm) Eséka	Cameroon	Socapalm Eséka Mill	Socapalm Eseka Plantation, Cameroon	3° 38' 27.60" N	10° 42' 42.84" E	-	Certified	2021	2021		No			
Société Camerounaise de Palmeraies (Socapalm) Mbongo	Cameroon	Socapalm Mbongo Mill	Plantation Sacopalm Mbongo, 19 KM De La RN3, Douala-Younde DIzangue, Littoral, na, Cameroon	3° 51' 54.14" N	9° 51' 22.80" E	-	Certified	2021	2021		No			
		Socapalm Mbongo Estate		3° 51' 54.14" N	9° 51' 22.80" E	6467	Certified	2021	2021		No			
Société Camerounaise de Palmeraies (Socapalm) Mbambou	Cameroon	Socapalm Mbambou Mill	Plantation Sacopalm Mbambou, 25 KM De La RN3, Douala-Younde DIzangue, Littoral, na, Cameroon	3° 43' 55.57" N	9° 51' 49.32" E	-	Certified	2021	2021		No			
		Socapalm Mbambou Estate		3° 43' 55.57" N	9° 51' 49.32" E	11112	Certified	2021	2021		No			
Société Camerounaise de Palmeraies (Socapalm) Edea	Cameroon	Socapalm Edea Mill	Kilometer 27, edea-Kribi road, snaga maritime division, littoral region	3° 34' 14.38" N	10° 6' 39.14" E	-	Certified	2021	2022		No			
		Socapalm Edea Estate		3° 34' 14.38" N	10° 6' 39.14" E	7770	Certified	2021	2022		No			

RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

Société Camerounaise de Palmeraies (Socapalm) Dibombari	Cameroon	Socapalm Dibombari Mill	N5, Nkapa, Littoral, Cameroon	4° 13' 14.11" N	9° 36' 24.59" E	-	Certified	2021	2022		No			
		Socapalm Dibombari Estate		4° 13' 2.77" N	9° 36' 28.92" E	11180.76	Certified	2021	2022		No			
Société Camerounaise de Palmeraies (Socapalm) Kienké/ Camseeds	Cameroon	Socapalm Kienké Mill	BP 179 Kribi Plantation Socapalm Kienké, RN dEbolowa Km 10, Ocean, Cameroon	2° 51' 23.54" N	9° 58' 30.15" E	-	Certified	2022	2023		No			
		Socapalm Kienké / Camseeds Estate		2° 51' 23.54" N	9° 58' 30.15" E	21720	Certified	2022	2023		No			
Brabanta	DRC	Brabanta Mill	Mapangu, territoire d'Ilebo, province de kasai, RD Congo	4° 22' 36.11" S	20° 17' 22.94" E	-	Certified	2021	2022		No			
		Sanga Sanga, Kadima and Kanangai Estates		4° 22' 36.11" S	20° 17' 22.94" E	1528.29	Certified	2021	2022		No			
		Lumbundji and Savannah Estates	Mapangu, territoire d'Ilebo, province de kasai, RD Congo	4° 24' 36.11" S	20° 21' 22.96 E	5971.31	Not Certified	2023			Yes	end 2023	Change of timing due to RaCP validation process	15-Jun-23
Agipalma	Sao Tome and Príncipe	Agirpalma Mill	Ribeira Peixe - APT 953 – Caué, Sao Tome and Principe	0° 6' 26.74" N	6° 36' 12.06" E	-	Certified	2021	2021		No			
		Titulo 409 Estate		0° 6' 27.00" N	6° 36' 11.00" E	665	Certified	2021	2021		No			
		Titulo 410 Estate		0° 7' 07.90" N	6° 35' 6.52" E	1735	Not Certified	2023			Yes	end 2023	Change of timing due to RaCP validation process	15-Jun-23

RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

Plantations Socfinaf Ghana (PSG)	Ghana	PSG Mill	Mpohor Wassa East District1 of the Western Region Ghana	5° 9' 23.58" N	1° 42' 47.62" W	-	Certified	2022	2022		No			
		PSG Manso Estate		5° 8' 41.28' N	1° 40' 05.84' W	910.67	Certified	2022	2022		No			
		PSG Subri Estate	Mpohor Wassa East District1 of the Western Region Ghana	5° 9' 23.58" N	1° 42' 47.63" W	17242.19	Not Certified	2023			Yes	end 2023	Change of timing due to RaCP validation process	15-Jun-23

3.3 Details of Nonconformities

The nonconformities are listed below. The findings summary of the assessment by criteria are listed in Appendix A. During this Assessment there were Two (2) Critical and One (1) Opportunity For Improvement raised. The Socfin SA - Brabanta Certification unit submitted Corrective Action Plans for the nonconformity. Corrective action plans with respect to the nonconformity was reviewed by the BSI audit team and accepted.

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

Non-conformity			
NCR Ref #	2299249-202301-M1	Issued Date	11/01/2023
Due Date	10/04/2023	Closure Date	30/03/2023
Indicator & Category (Critical / Minor)	3.4.3 (Critical)		
Statement of Nonconformity:	The social management and monitoring plan has not been reviewed and updated in a participatory manner.		
Requirement Reference:	The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way.		
Objective Evidence:	<p>Brabanta Certification Unit commissioned an independent social and environmental impact assessment. According to national legal requirements, this assessment must be reviewed and updated every five years. In fulfilment of this legal requirement, Brabanta reviewed and updated its SEIA in June 2022.</p> <p>However, the social management action and monitoring plan has neither been reviewed nor updated in a participatory manner.</p>		
Corrections:	<ol style="list-style-type: none"> 1. Organise a meeting with community representatives and involve the sector chief as local authority (political-administrative authority) 2. Present the table of planned actions in favour of the communities and their costs. 3. Present all actions carried out and their costs. 4. Present the actions not carried out and their costs. 5. Give the reasons and causes that did not allow the realisation of these actions. 6. Present a new programme of actions with their costs and deadlines for completion. 7. Set the date for the next meeting to review the social action plan. 		
Root Cause Analysis:	The social management plan was not reviewed at the end of 2022, as the last quarterly meeting was postponed to January for logistical and social reasons, during which the action plan for actions to be carried out in favour of the local communities was to be discussed		
Corrective Actions:	<ol style="list-style-type: none"> 1. A meeting is held with community representatives and the head of sector. 2. The management action plan developed in 2021 is presented to the assembly with their costs. 		

	<ol style="list-style-type: none"> 3. The actions carried out in favour of the communities were presented and approved, with their costs. 4. The actions not carried out and their costs were presented, along with the reasons and causes that did not allow them to be carried out. 5. A revision of the social management action plan was made taking into account the actions not carried out in 2022 with the agreement of all the participants and the validation of the head of the sector as local authority. 6. Signature and validation of the action plan by the authority. 7. A next review date for the plan is set for January 2025 in accordance with the guideline on indicator 3.4.3. The review plan will also be included in the yearly management plan developed at the beginning of the year to ensure the review is done at the planned time. 8. A report has been drawn up.
<p>Assessment Conclusion:</p>	<ol style="list-style-type: none"> 1. Reviewed the updated Social management plan (Plan d’Action Gestion Sociale, Document Ref: AGS, Review Index: 01, and dated 14 March 2023) 2. Reviewed minutes of meeting with riparian village communities that was held on 01/03/2023. The purpose of the meeting was to consult with the communities on the new actions to be taken as part of the social management plan. The meeting was held in Mapangu and was attended by 25 person from all the different communities. The attendance list was attached to the minutes of the meeting. The meeting was facilitated by an external expert from Le Carnet Consulting, represented by Mr. Talambote. 3. Held a meeting with community leaders to corroborate their involvement in updating the social management plan. The meeting took place in Mapangu as part of NC closure verification field visit on 29/03/2023. Discussions with 22 participants from the different communities confirmed that they were duly consulted by Brabanta Certification Unit in view of updating the social management plan. An attendance sheet of participants is attached. <p>Based on the evidence presented this NC has been closed on 30/03/2023.</p>

Non-conformity			
NCR Ref #	2299249-202301-M2	Issued Date	11/01/2023
Due Date	10/04/2023	Closure Date	30/03/2023
Indicator & Category (Critical / Minor)	5.1.5 (Critical) - Escalated due to Reoccurrence of Previous Minor.		
Statement of Nonconformity:	Contracts for FFB Suppliers did not include agreed timeframe.		
Requirement Reference:	Contracts are fair, legal and transparent and have an agreed timeframe.		
Objective Evidence:	The contract agreement entitled <i>Contract D’Achat Noix Villageois</i> dated 08/10/2021 between Brabanta and the Village FFB Collectors did not have an agreed timeframe stated in it. Due to this being a reoccurrence under the same indicator, a critical non-conformity is raised.		
Corrections:	<ol style="list-style-type: none"> 1. Organise a meeting with the representatives of the cutters supplying the loose fruit. 		

	<ol style="list-style-type: none"> 2. Discuss purchase prices for the year 2023. 3. Draw up the contract for the purchase and/or sale of the detached fruit for 2023, including the period or timeframe for payment upon delivery of the palm fruit. 4. Have the contract signed by both parties (Brabanta and the cutters represented).
Root Cause Analysis:	When the village nut (oil palm) purchase contract was signed, both parties agreed that the payment would be made as soon as Brabanta received the ticket or voucher for the weighbridge, but unfortunately this was not included in the contract.
Corrective Actions:	<ol style="list-style-type: none"> 1. The sustainability team to ensure and monitor that all pricing agreements between Brabanta and contractors are stated in the contract agreement and not limited to verbal agreements. 2. A meeting was held with representatives of the cutters who supply the village nuts. <ul style="list-style-type: none"> – The wind price for 2023 was discussed and agreed upon. – The contract is drawn up in duplicate with a payment period or deadline. – The contract is signed by all parties involved. – The signed contract is reproduced according to the number of groups of cutter-suppliers represented, which corresponds to the number of communities involved. – Each group of village nut cutter-suppliers concerned receives a copy of the contract.
Assessment Conclusion:	<p>Henceforth, Brabanta does not buy fruits directly from village FFB collectors. Rather, Brabanta buys the collected FFBs from Mr. Alex Kumambange, who in return buys the FFB collected by villagers.</p> <ol style="list-style-type: none"> 1. Reviewed contract between Mr. Alex Kumambange and Brabanta for purchase of FFB (Contrat d’Entreprenariat No 001/2023, of 15 March 2023). 2. Reviewed contract for sale of FFB by community members titled (<i>Contrat d’Achat Noix Villageoises</i>, dated 20/03/2023) between Mr. Alex Kumambange and village FFB collectors. Article 2 of this contract fixes current price at 6.300 Congolese Francs per box of 50Kg of FFB. Meanwhile, Article 4.2 of the contract stipulates that FFB collectors will be paid after a maximum period of 48 hours after they supplied their FFB. <p>Based on the evidence presented this NC has been closed on 30/03/2023.</p>

Opportunity for Improvements	
OFI #	Description
OFI 1	<p>OFI Reference: 2299249-202301-I1</p> <p>Indicator: 1.1.5</p> <p>The company has a documented list of its stakeholders which was made available to the audit team. The list contains information on the Name of the stakeholder, activities they perform and contact address. Some of the stakeholders such the communities, Workers Union and FFB suppliers were selected during this audit period for consultations.</p>

	However, the stakeholder list can be improved to include the date and categorization of the different stakeholder.
--	--------------------------------------------------------------------------------------------------------------------

Positive Findings	
PF #	Description
PF 1	Much improvement on compliance towards RSPO Standard compared to previous assessment.
PF 2	Workers Housing in Conducive Conditions.
PF 3	Good understanding by staffs and workers on GAP, H&S and Environment Protections.

3.3.1 Status of Nonconformities Previously Identified and Observations

Non-conformity			
NCR Ref #	2111113-202108-M1	Issued Date	03/09/2021
Due Date	02/09/2022	Closure Date	23/12/2021
Indicator & Category (Critical / Minor)	3.6.1 (Critical)		
Statement of Nonconformity:	Brabanta does not have a documented risk assessment report in place.		
Requirement Reference:	All operations are risk assessed to identify H&S issues. Mitigation plans and procedures are documented and implemented.		
Objective Evidence:	<p>Brabanta has not assessed the risk of all of its operations. Consequently, mitigation plans have not been documented and implemented for all risks associated with its operations. The company has HSE policy and HSE procedures for risk assessment. The company have had training in risk assessment and in the process of completing its risk assessment using the participation therefore is not yet completed and there are a number of risk areas expressed by workers which are currently not identified for mitigation actions.</p> <p>For example,</p> <ol style="list-style-type: none"> 1. Harvesters in all visited sites complained of lack of body protection without uniforms though section 4 (<i>Equipements De Protection Individuelle</i>) of the indicates to use uniform for body protection. 2. The CPO storage tanks at the mill have no retention wall (though the company has plans and a budget to construct a retention wall). 		
Corrections:	<ol style="list-style-type: none"> 1. Finalizing the ongoing risk assessment by using the participatory approach 2. Integrate workers' observations 3. Have third party/expert verification done 4. Have the results validated by management 5. Disseminate to all staff 6. Implement the agreed actions (purchase of PPE, training, awareness raising, etc.) 7. Relocate the fuel station (planned in the 2021 budget) 		

RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

	<ol style="list-style-type: none"> 8. Construction of CPO tank storage facilities (planned in the 2021 budget) 9. Carry out monitoring and evaluations 10. Annual review of analyses
Root Cause Analysis:	<p>Risk assessment and analysis training took place in May 2021. This training was delayed due to international restrictions related to the Covid-19 pandemic. Due to these delays, the risk assessment was not finalized on the day of the audit.</p>
Corrective Actions:	<ol style="list-style-type: none"> 1. A draft risk assessment has been sent to the Earthworm Foundation 2. Earthworm Foundation returned the table with some comments and suggestions 3. A meeting of the HSE committee in a special committee was organized with a few workers to harmonize the risk assessment table. 4. An HSE Committee was organized on 08/10/2021. A plan was discussed to receive feedback from workers regarding their views on safety in the field. This information will be collected by the sub-committee and discussed at monthly meeting at the Health and Safety at work. 5. The risk assessment table is ready, there are still some adjustments suggested by EF. 6. As soon as the adjustments are made the table will be sent again to EF for a final touch-up. 7. Construction work on the CPO tanks is underway.
Assessment Conclusion:	<ol style="list-style-type: none"> 1. Reviewed a risk assessment that covers various activities of the company's operations including workshop, plantations and office. 2. Reviewed minutes of meeting between the Health and Safety manager with the HSE committee on the 8/10/2021. The Purpose of the meeting was Reorganisation of the HSE Committee . The meeting was attended by 14 members. 3. Reviewed minutes of meeting between the HSE committee and the workers on the 16/12/2021. The purpose of the meeting was on Feedback from the Non Conformities, Strength, Weakness and Expectations and attended by 22 workers. Some of the feedback from the workers include cleanliness of the environment which result in diseases, Insufficient water for the housing, risk to house from collapse due to the use of sand as building material. 4. Also during a field visit to the mill it was observed that a retention wall has been constructed around the CPO tank. <p>Based on the evidences reviewed the NC is closed.</p>
Effectiveness Closure (for previous audit closed Critical NC):	<p>The established Risk Register documented in <i>Brabanta - Departement Agronomique : Analyse De Risques</i>, was available for verification. The document has identified all risks associated to workstations in the estate and mill. The identified risks has been established its control measures. The mill and estate management conduct monthly site inspections to ensure the risk mitigation methods are adhered to accordingly. Training programs are in place to train all personals regularly on the mitigation plans as well. During the field visit document reviews, the implementation of the risk controls were verified. Evidences such as implementation of safe operating procedures, usage of PPEs and sensitisation programs were available and verified. Hence, the critical non-conformity remains closed.</p>

RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

Non-conformity			
NCR Ref #	2111113-202108-M2	Issued Date	03/09/2021
Due Date	02/09/2022	Closure Date	23/12/2021
Indicator & Category (Critical / Minor)	3.6.2 (Critical)		
Statement of Nonconformity:	The systems to monitor the effectiveness of the H&S plan are not completed.		
Requirement Reference:	The effectiveness of the H&S plan to address health and safety risks to people is monitored.		
Objective Evidence:	Brabanta has a Health and Safety plan with timelines which is distributed. A health and safety committee has been put in place who will be meeting every month to deal with health and safety plan implementation effectiveness. However, these are all work in progress as the risk assessment is yet to be completed, the health and safety plan to be updated and the HSE committee is yet to start its work.		
Corrections:	<ol style="list-style-type: none"> 1. Convene the first meeting of the Health and Safety Committee 2. Identify and explain the roles and duties of the committee members 3. Formalise the health and safety committee 4. Create an agenda 5. Schedule meeting dates 		
Root Cause Analysis:	Risk assessment training was finalised in May 2021, which forms the basis of the health and safety plan. This was delayed due to Covid-19 restrictions. As a result of this delay, the creation of the policy, plan and committee was finalised in August 2021.		
Corrective Actions:	<ol style="list-style-type: none"> 1. A meeting of the health and safety steering committee has been held and an HSE committee has been reorganized in accordance with Congolese law with its powers as set by the said law 2. The roles and responsibilities of the members of the Steering Committee have been identified 3. A calendar of meetings has been created 		
Assessment Conclusion:	<ol style="list-style-type: none"> 1. Reviewed minutes of meeting between the Responsible person for Health and Safety with the Committee members on the Health and Safety at Work on the 15/09/2021. The meeting was attended by 14 committee members. 2. Reviewed a document titled "Health, Safety & Environment Committee" dated 08/11/2021 and signed by the Director General. The document reviewed shows all the committee members with their assigned roles and responsibilities. <p>Based on the evidences reviewed the NC is closed.</p>		
Effectiveness Closure (for previous audit closed Critical NC):	<ol style="list-style-type: none"> 1. The mill and estate conduct weekly monitoring on the stations and activities to monitor the effectiveness of the implementation of safety in their operating units. They have established a weekly checklist which consist of monitoring prior to work being started as well as during the work is being carried out. 2. Monthly Site Inspections are conducted by the HSE Sustainability team at the mill and estate to ensure all safety plans are in place and adhered to by the workers and personals. 		

	<p>3. The Brabanta Health Centre conduct regular check-up for their workers especially chemical handlers to monitor the health condition and occupational consequences that may occur to their workers. Records of monitoring were available and verified at the Brabanta Health Centre.</p> <p>Hence, the Critical Non-conformity remains closed.</p>
--	--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

Non-conformity			
NCR Ref #	2111113-202108-M3	Issued Date	03/09/2021
Due Date	02/09/2022	Closure Date	23/12/2021
Indicator & Category (Critical / Minor)	5.1.2 (Critical)		
Statement of Nonconformity:	The company does not explain the price of FFB to the loose fruit collectors.		
Requirement Reference:	Evidence is available that the unit of certification regularly explains the FFB pricing to smallholders.		
Objective Evidence:	Brabanta did not provide evidence of having regularly explained its pricing to its Loose Fruit Collectors. The company did not have FFB suppliers but Loose Fruit Collectors who collect fruits from the wild and sell to the company. Interview with the company confirmed that it has not explained the pricing of loose fruits to collectors as required by this RSPO standard.		
Corrections:	<ol style="list-style-type: none"> 1. Review the clauses of the village loose fruit purchase protocol to include clauses prohibiting child and forced labour. 2. Organise a meeting with all loose fruit collectors to communicate the price. 3. Include a discussion of the protocol in this meeting with the collectors. 4. Display prices in the villages. 5. Follow up to ensure that the pricing and posting of prices has been understood by the collectors. 		
Root Cause Analysis:	The pricing was communicated to village chiefs but these have not been properly disseminated. And some villagers, some harvesters and collectors have never attended the meetings.		
Corrective Actions:	<ol style="list-style-type: none"> 1. The protocol is reviewed and improved, and approved by the Suppliers of the Loose fruits 2. Awareness-raising on child labour and forced labour is carried out from which the cutters supplying the village nuts have benefited. 3. A meeting is organized with the cutters and suppliers of the nuts. 4. Prices are displayed. 5. Whenever the price changes, this will be explained to the village harvesters. 		
Assessment Conclusion:	<ol style="list-style-type: none"> 1. Reviewed the contract of agreement between the company and the LFC signed on the 8/10/2021. The contract was updated to include the company's policies on child and forced labour. 2. Reviewed minutes of meeting on the negotiations on the FFB pricing with the LFC on the 8/10/2021. Meeting was attended and signed by all 48 LFC. 		

RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

	<p>3. Reviewed sensitization report on the company’s policy on Child and Forced labour organised on the 22/09/2021 for 33 LFC.</p> <p>4. Field visit showed the FFB pricing list displayed at the weighbridge and other vantage points easily access to the communities when they visit the company. Interview with the communities also established that the FFB pricing list has been displayed in the communities.</p> <p>5. Reviewed SOP on the FFB pricing and interview with the communities confirmed they were involved in the FFB pricing.</p> <p>Based on the evidences reviewed the NC is closed.</p>
Effectiveness Closure (for previous audit closed Critical NC):	<p>Interview with the Village FFB Collectors indicate that they are aware on the pricing mechanism of Brabanta POM as they have attended a meeting on the FFB Pricing. Verified the “<i>Rapport Des Reunions Avec Les Coupeurs Des Noix Villageoises</i>” conducted on 18/12/2021 for all Village FFB Collectors. Hence, the critical non-conformity remains closed.</p>

Non-conformity			
NCR Ref #	2111113-202108-M4	Issued Date	03/09/2021
Due Date	02/09/2022	Closure Date	23/12/2021
Indicator & Category (Critical / Minor)	6.1.5 (Critical)		
Statement of Nonconformity:	There is a lack of awareness among workers in the estate about the Gender Committee		
Requirement Reference:	A gender committee is in place specifically to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women.		
Objective Evidence:	<p>The company has a gender committee in place formed on 11th September 2019 with the aim of ensuring no sexual harassment at the work place, pregnant women do not handle chemical activities, breastfeeding women have enough time to breast feed the children, identification of new mothers needs and propose actions to the needs and ensure there are no discrimination against women for promotion.</p> <p>However, during interview with female workers at Kanaiga, Sanga Sanga and Kadima estate the workers indicated they are not aware of the existence of the gender committee.</p>		
Corrections:	<ol style="list-style-type: none"> 1. Hold a debriefing meeting on the NC audit with the current members of the Gender Committee 2. Increase the number of members of the gender committee for more visibility and presence (from 2 to 16 members in agro i.e. 4 per division) 3. Conduct a training meeting with all members, new and old, to explain to members their duty and the activities of the committee 4. Presentation of the gender committee to all workers by department (General manager, factory, plantation by division and by section, hospital) 5. Explain to all staff the role of the gender committee 6. Create a meeting agenda and meetings with all staff per department and section for planting 		

RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

Root Cause Analysis:	The committee was set up without a formal presentation to all staff. The number of members was insufficient to cover the entire workforce of all the estates
Corrective Actions:	<ol style="list-style-type: none"> 1. On 13 September 2021 a meeting to re-launch the gender committee was held 2. From 14 September 2021 presentations were given, explaining the role and responsibilities of the gender committee to all staff starting with Sanga Sanga, Kadima, Kanangai, Hospital, Garage, Factory, 3. The number of members has increased to 24 across the company 4. Member training is scheduled for 16 October 2021 5. A diary, minutes template and meeting schedule have been created
Assessment Conclusion:	<ol style="list-style-type: none"> 1. Review minutes of meeting on the 13/09/2021 by the Gender Committee on the Relaunch of the Gender Committee. The meeting was attended by 8 committee members. 2. Reviewed minutes of meetings on the Roles and Responsibilities of the Gender Committee with workers <ol style="list-style-type: none"> a. Date: 15/12/2021 Venue: Kadima Estate Attendance: 10 workers b. Date: 17/09/2021 Venue: Kanangai Estate Attendance: 70 workers 3. Reviewed a documented captioned "List of Brabanta Gender Committee Members" dated 16/10/2021 and signed by the responsible person for sustainability. The document as reviewed shows the number of the committee members has been increased from 10 to 24. 4. Review training records for members of the committee. <ol style="list-style-type: none"> 1. Date: 16/10/2021 Venue: Conference room Attendance: 27 5. Reviewed a plan titled Calendar on the Meeting of the Gender Committee" and signed by the Responsible person for sustainability. Review of the plan indicates the gender committee will hold meetings ones every three months. <p>Based on the evidences reviewed the NC is closed</p>
Effectiveness Closure (for previous audit closed Critical NC):	The Gender Committee meets once every three months and ones each week with the entire workers. Copies of the minutes of meetings were made available to the audit for review. Interview with 9 female workers in the Kadima Estate confirmed their awareness of the gender committee and has had engagement with the committee. Hence, the critical non-conformity remains closed.

Non-conformity			
NCR Ref #	2111113-202108-M5	Issued Date	03/09/2021
Due Date	02/09/2022	Closure Date	23/12/2021
Indicator & Category (Critical / Minor)	6.2.4 (Critical)		

Statement of Nonconformity:	Some of the housing facilities visited are not in good conditions
Requirement Reference:	The unit of certification provides adequate housing, sanitation facilities, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. National laws, or in their absence the ILO Guidance on Workers’ Housing Recommendation No. 115, are used. In the case of acquisitions of non-certified units, a plan is developed detailing the upgrade of infrastructure. A reasonable time (5 years) is allowed to upgrade the infrastructure.
Objective Evidence:	The company has a five-year development plan which aims at making more houses available to accommodate the workers. The plan was made available to the audit team for review. Currently the company has some houses which has been made available to the workers. However, field visits to some of the housing in Sanga Sanga, Kadima show most of the toilets and bathrooms are damaged and has not been repaired.
Corrections:	<ol style="list-style-type: none"> 1. Creation of a team to carry out housing and toilet/bathrooms inventories 2. Conduct housing inventories and provide information on the quality and efficiency of housing in general and sanitation in particular 3. Assess the cost 4. Draw up a budget 5. Draw up a programme (with a timetable of activities) for the construction and rehabilitation of the toilets 6. Build and rehabilitate the toilets 7. Integrate sanitation facilities in new constructions 8. Educate users on proper use and maintenance 9. Make a programme of visits to check the efficiency, hygiene and cleanliness of the sanitary blocks (HSE department) 10. Set up a system to report any deterioration (damage) and failure of the sanitary facilities
Root Cause Analysis:	Inefficiency of the sanitary facilities built in the camps, no monitoring of the efficiency of the sanitary facilities in the villages, lack of training on hygiene and the correct use of the sanitary facilities, lack of a system in place to report any damage or malfunctioning of the sanitary facilities in particular and housing in general.
Corrective Actions:	<ol style="list-style-type: none"> 1. A team shall consist of the Head of Division 1, HSE manager and Sustainability manager (RGDD). Based on the report of the camp visit to assess the situation of the sanitary facilities in Division 1 2. A proposal was made to the Director of Finance who assessed the cost of the project 3. A budget was voted based on cash flow 4. A staggered program 2021-2022 is set up 5. A call for tenders has been launched 6. Contractors have been selected for the realization of the said project (NELFI Group, LA FRAUGNES, ZAFRICOM)

RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

	7. A quarterly inspection program by the camp is set up (a report is written by the camp service. This will be done every 3 months). Inspection information is used to populate Brabanta camp data (Brabanta Data Camps)
Assessment Conclusion:	<ol style="list-style-type: none"> 1. Reviewed a report titled "<i>Rapport sur la Mission d'évaluation de la situation et d'inventaires des sanitaires en Division 1 realisee du 15 au 16 September 2021</i>" dated 16/09/2021 and signed by the responsible person for Sustainability Development. This is an assessment report on the housing situation in the various estates. Also reviewed a report captioned Sanitary. Situation in Division 1" and it identified the number of sanitary to be constructed in the camps. 2. Reviewed a proposal sent to the Director of finance based on the assessment that was conducted. The proposal identifies the number of toilet and bathrooms that needs to be constructed and renovated between 2021 to 2023. 3. Field visit to the housing units in the Sanga Sanga, Kadima and Kanaiga estates identified the construction of new toilets and bathrooms for workers use and others are in the process of being constructed 4. The company has documented a procedure captioned "<i>Procédure de demande des travaux (entretien et reparation batiment)</i>" dated 21/10/2021 and approved by the Director General. The procedure as reviewed present the steps that must be followed to ensure the maintenance of the facilities. During housing visits by the audit team, workers confirmed they have received an informal training on the procedure at their morning muster and also at the housing units. <p>Based on the evidences reviewed the NC is closed.</p>
Effectiveness Closure (for previous audit closed Critical NC):	The company has a housing policy which defines the criteria for the allocation and management of housing made available to their employees. The policy is applicable to both temporal and permanent workers. The company has also developed a five-year housing plan (2022 to 2026) which aims at making more houses available to accommodate the workers. The plan was made available to the audit team for review. Currently the company has some houses which are available to the workers. A visit to houses with number 8,9,10,11 in the Kanaiga estate indicated that all houses were in good condition. Hence, the critical non-conformity remains closed.

Non-conformity			
NCR Ref #	2111113-202108-M6	Issued Date	03/09/2021
Due Date	02/09/2022	Closure Date	23/12/2021
Indicator & Category (Critical / Minor)	Indicator 6.3.1 (Critical)		
Statement of Nonconformity:	The company internal regulations places a limit on the rights to form an association.		
Requirement Reference:	A published statement recognising freedom of association and right to collective bargaining in national languages is available and is explained to all workers in languages that they understand, and is demonstrably implemented		
Objective Evidence:	The company has a documented Freedom of Association policy dated 26/02/2017 and signed by the General Manager. The policy indicates that Brabanta supports the right of workers to freely associate with others, including the right to form and join trade unions for the protection of their interests.		

RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

	However, the company policy states that the right to the association applies only on condition that it does not interfere with the internal regulations. The rights to form an association is given by the constitution and it cannot be limited by the working regulations of Brabanta.
Corrections:	<ol style="list-style-type: none"> 1. Review policy based on national legislation only 2. Disseminate widely to all staff <p>Raise awareness among all staff and neighbouring communities</p>
Root Cause Analysis:	The reason for including this section was to ensure that any association formed always complied with general company regulations and policies, such as non-discrimination.
Corrective Actions:	<ol style="list-style-type: none"> 1. The policy was revised since 01/09/2021 2. A display on the billboards took place through the site 3. Awareness-raising took place in different departments
Assessment Conclusion:	<ol style="list-style-type: none"> 1. Reviewed a revised policy on the freedom of association dated 01/09/2021 and signed by the Director General. The policy was revised to exclude restriction on the rights to freedom of association which was based on the company's internal regulations. 2. Reviewed records on the Awareness and sensitization of workers on the policy. <ul style="list-style-type: none"> Topic: Freedom of Association policy Date: 14/10/2021 Venue: Sanga Sanga Attendance:12 workers <ul style="list-style-type: none"> Topic: Freedom of Association policy Date: 14/10/2021 Venue: Kanaiga estate Attendance:15 workers 3. Field visit also established the display of the policy on the notice boards in and around the company. <p>Based on the evidences reviewed the NC is closed</p>
Effectiveness Closure (for previous audit closed Critical NC):	<p>Verified the Policy On The Freedom Of Association dated 01/09/2021 and signed by the Director General. The policy was revised to exclude restriction on the rights to freedom of association which was based on the company's internal regulations.</p> <p>During field visit to the factory, administration and three estates, it was observed that the revised policy has been publicly displayed on notice boards in and around the company. Interview with sampled workers in the Kanaiga, Sanga Sanga and Kadima estate all confirmed the revised document has been explained to their understanding and all workers belong to one of the four union bodies in the company. Hence, the critical non-conformity remains closed.</p>

Non-conformity			
NCR Ref #	2111113-202108-M7	Issued Date	03/09/2021
Due Date	02/09/2022	Closure Date	23/12/2021

RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

Indicator & Category (Critical / Minor)	Indicator 6.7.1 (Critical)
Statement of Nonconformity:	There are no record of meeting between H&S committee and workers.
Requirement Reference:	The responsible person(s) for H&S is identified. There are records of regular meetings between the responsible person(s) and workers. Concerns of all parties about health, safety and welfare are discussed at these meetings, and any issues raised are recorded.
Objective Evidence:	Brabanta has Identified the HSE Manager as the responsible person for the company's HSE verified from his Job description (Definition de Fonction) of 03/02/2020. The company uses the Tools Box Talks to communicate on Health and Safety to workers weekly. The company has constituted HSE Committee which is yet to function and to receive feedback from workers for action. Currently, the company uses medical records from its clinics as the proxy for health and safety concerns for workers (e.g. High medical attendance for Malaria as proxy for high mosquito infestation and for action such as supply of Mosquito nets). Consequently, the company only partially conform to this requirement as it has no means of receiving the health and safety and welfare concerns of workers.
Corrections:	<ol style="list-style-type: none"> 1. Convene the first meeting of the Health and Safety Committee to define the committee's activities 2. Create a mechanism to provide feedback to the health and safety committee for discussion and decisions to be made 3. Raise awareness to workers to report unsafe situations 4. Formally report workers' requests and grievances in the area of health and safety at work 5. Compile the requests and grievances to be discussed by the health and safety committee 6. Share information on decisions taken, to those concerned in particular and to all staff in general
Root Cause Analysis:	No formalization of feedback and consideration of workers' requests and grievances, but requests are dealt with (e.g. medical consultation procedure), the committee's activities not yet well defined although the plan is developed
Corrective Actions:	<ol style="list-style-type: none"> 1. A meeting of the HSE Committee was convened 2. An organization chart was drawn up (restructuring of the HSE committee) 3. The function, role and responsibility of each member have been defined 4. A meeting schedule is set 5. A plan has been implemented to gather worker feedback on safety and security and to discuss it at the management level. If necessary, changes will be made to safety and security measures to address workers' concerns.
Assessment Conclusion:	<ol style="list-style-type: none"> 1. Reviewed records on minutes of meetings on the Health and Safety at work by the HSE Committee on the 15/09/2021. The meeting was attended by 14 committee members 2. Reviewed the HSE committee organizational chart dated 8/10/2021 and signed by the General Director.

	<p>3. Reviewed a document titled "Health, Safety and Environmental Committee" dated 08/11/2021 and signed by the Director General. The document reviewed shows all the committee members with their assigned roles and responsibilities.</p> <p>4. Reviewed a document captioned " Calendrier de Rencontres (Reunions) du comite de Pilotage SST Brabanta" dated 15/09/2021 and approved by the Responsible person for Sustainable Development. The document as reviewed indicates that the committee will meet ones every month on the first week of the month.</p> <p>5. The company has captioned "Plan de Sante et Securite au Travail" dated 04/03/2021 and signed by the Director General. The objective of the plan is to recommend actions. The plan outlines five steps to be implemented in the event of an accident. The plan is implemented through analysis of risk, creation of the HSE committee, and sensitization of workers.</p> <p>Based on the evidences reviewed the NC is closed</p>
<p>Effectiveness Closure (for previous audit closed Critical NC):</p>	<p>The HSE Organizational Committee 2023 was available, undersigned by the General Director. Regular HSE Meetings were conducted to address all Health and Safety related issues. The records of HSE meeting was available for verification. The meeting minutes has allocated as part of the agenda for the committee members which includes workers representatives to voice out Health and Safety concerns to the management. Hence, the critical non-conformity remains closed.</p>

Non-conformity			
NCR Ref #	2111113-202108-M8	Issued Date	03/09/2021
Due Date	02/09/2022	Closure Date	23/12/2021
Indicator & Category (Critical / Minor)	Indicator 6.7.3 (Critical)		
Statement of Nonconformity:	Workers were found not to be using their PPEs		
Requirement Reference:	Workers use appropriate personal protective equipment (PPE), which is provided free of charge to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, land preparation, and harvesting. Sanitation facilities for those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing.		
Objective Evidence:	<p>Brabanta has provided PPEs free of charge to its workers. However, several workers from the Mill, harvesting operations and other operational sites sighted and interviewed by the audit team were not using their provided PPEs. For example, at the Ramp in the Mill, at the Kadima Water Catchment site.</p> <p>Also, the company has provided sanitation facilities for its pesticide applicators to change out of their PPEs into their personal clothing. Inspection of the design of such facility at Sanga Sanga however, suggested that workers can contaminate their personal clothing from the field before they change out and wash. Respirators are not used at those chemical stores which stores pesticides. For example, shelves at the KCI Depot 3 where fungicides such as Addax DG are stored.</p>		
Corrections:	<ol style="list-style-type: none"> 1. Implementation of the PPE management procedure by heads of department 2. Intensify awareness-raising on the use of PPE for all staff 		

RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

	<ol style="list-style-type: none"> 3. Train operators in the use of PPE (how to put on and take off each PPE, how to maintain each PPE) 4. Systematic checks on the wearing of PPE by team leaders (see PPE management procedure) before and during work 5. Arrange the changing rooms at Sanga Sanga to ensure that there is no contamination of personal clothing 6. Raise awareness among the users of the changing room 7. Train all those involved in the use of the changing room
Root Cause Analysis:	<p>Construction of showers underway and not yet completed at the time of the audit/ Training has been provided to all levels of the operation on the PPE required for their task, and PPE is provided and available to all workers. However, it appears that some workers did not fully understand the need to wear their PPE. Furthermore, these non-compliances were not observed by the leaders and supervisors who are in place to ensure compliance with PPE. A lack of understanding and execution of tasks is therefore considered the root cause of this NC.</p>
Corrective Actions:	<ol style="list-style-type: none"> 1. The PPE management procedure was drafted and approved by the DG 2. A broadcast of the procedure took place via Outlook 3. Awareness-raising began in different departments during morning calls 4. And controls by managers at the departmental level take place 5. The Sanga Sanga changing rooms have been demolished and reconstruction work is underway
Assessment Conclusion:	<ol style="list-style-type: none"> 1. Reviewed a procedure captioned Procedure de gestion des EPI dated 04/04/2021. 2. Evidence of dissemination of the procedure to all the sectional heads through Microsoft outlook on the 9/10/2021 was reviewed. 3. Reviewed records on the sensitization on the procedure Topic: PPE Management Date: 14/10/2021 Venue: Kanaiga Estate (C1) Attendance: 15 workers Topic: PPE Management Date: 14/10/2021 Venue: Sanga Sanga Estate (A1,A5,A2 A3) Attendance: 12 workers 4. Field visit to the Sanga Sango estate shows a new changing room for the chemical applicators has been constructed and is in use. <p>Based on the evidences reviewed the NC is closed</p>
Effectiveness Closure (for previous audit closed Critical NC):	<ol style="list-style-type: none"> 1. Brabanta Certification Unit have ensured all workers are all provided appropriate PPEs with accordance to the job they conduct. During the visit to the Herbicide Applicators, Loose Fruit Pickers, Harvesters and FFB Loaders, it was sighted that the workers were wearing all appropriate required PPEs.

RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

	<p>2. Sanitisation facilities were available at each division in the estate. Visit to the Sanitisation Facility at Kanangai Estate indicated that the facilities were well maintained and used by the herbicide applicators to clean themselves prior to returning home. Interview with the sprayers indicated that they are mandatory to clean themselves prior to returning home.</p> <p>3. Visit to the Chemical Store at the estates, indicated that all personals that enter the chemical store are provided with appropriate PPEs.</p> <p>Hence the critical non-conformity remains closed.</p>
--	-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

Non-conformity			
NCR Ref #	2111113-202108-M9	Issued Date	03/09/2021
Due Date	02/09/2022	Closure Date	23/12/2021
Indicator & Category (Critical / Minor)	Indicator 7.2.7 (Critical)		
Statement of Nonconformity:	The company stores expired chemicals together with the good ones in the same room		
Requirement Reference:	Storage of all pesticides is in accordance with recognised best practices.		
Objective Evidence:	<p>HSE has developed a checklist for the monitoring of storage zones for pesticides (Checklist: <i>Stockage des Produits Chimiques</i>). This checklist is used for monitoring on a regular basis. The checklist encompasses issues of safety, security, proper aeration, inventories, PPE, etc. in and around the storage zones. A monthly action plan for the monitoring of storage areas has been developed by the unit of certification. The action plan for the month of August was presented during the audit.</p> <p>However, at the main chemical/pesticides storage site, expired chemicals were found stored in the same space as chemicals that are still being used.</p> <p>This was the case with KCl in Depot 2, with expiry date of 01/2021. Additionally, in Depot 3, we found that 2, 4D Amine (720g/l), manufactured on 27/02/2021, was stored. Whereas the information sheet on the container says the product expires after two years (i.e., 2013 in this case), the product was still found on the shelves in Depot 3. Other expired products were equally found on the shelves in Depot 3, namely Addax and Carbalm.</p>		
Corrections:	<ol style="list-style-type: none"> 1. Make an inspection schedule for storage facilities 2. Take inventory of stored products 3. Identify expired products and quantify them (volume, count) 4. Create a storage unit to store expired products 5. Store all expired products in compliance with the rules of incompatibility, wearing PPE, retention, etc. 6. Find an approved service provider to collect them 7. If no service provider can be found, a plan will be drawn up to manage the stock of obsolete chemicals, in accordance with national legislation. 		
Root Cause Analysis:	Lack of authorised service providers able to collect expired items for disposal or destruction, insufficient space and reorganisation of storage areas		

RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

Corrective Actions:	<ol style="list-style-type: none"> 1. An inspection took place at the Beach depot 16 September 2021 2. An inventory of products has been made 3. The identification of all expired products made and a list of expired products is established 4. All products have been grouped and separated from non-expired products and then stored according to incompatibilities with global retention 5. Inspections were carried out in other chemical and phytosanitary depots of the plantation (10-16 October), as part of the monthly inspections of the depot. 6. Two potential providers are found with whom we are in discussion and evaluation at the end of making a selection of the best provider based on their experiences 7. Information and research is provided that confirms that granular KCl does not expire. 8. All KCL will be spread in planting from November
Assessment Conclusion:	<ol style="list-style-type: none"> 1. Reviewed a list of all the expired pesticides identified after an inventory was taken on the 17/10/2021. 2. A visit to the main chemical store also shows all the identified expired chemicals have been separated from the other chemicals still good for use. 3. Reviewed mail correspondence between the company and three sub-contractors on the management of waste including expired pesticides generated in the company. <p>Based on the evidences reviewed the NC is closed</p>
Effectiveness Closure (for previous audit closed Critical NC):	<ol style="list-style-type: none"> 1. Visit to the chemical stores at Sanga Sanga Estate, Kadima Estate and Kanangai Estate, there were no evidence of expired chemicals stored in the store. The chemicals stored in the store were crossed check with the register of Chemicals available at each site. The document was found to be tally with the physical inventory. 2. The management realizes that they have to purchase chemicals in bulk due to the isolated location of the certification unit. Nevertheless, the management of the chemicals will be monitored closely that the chemicals are not stored beyond the expiry date. 3. Interview with the chemical store attendant confirmed that no expired chemicals are stored in the Chemical Store. If the chemicals are nearing it shelf expiry dates, the chemicals are transferred to the waste department to be handled responsibly. <p>Hence the critical non-conformity remains closed.</p>

Non-conformity			
NCR Ref #	2111113-202108-M10	Issued Date	03/09/2021
Due Date	02/09/2022	Closure Date	23/12/2021
Indicator & Category (Critical / Minor)	Indicator 7.10.1 (Critical)		
Statement of Nonconformity:	The company does not have a documented plan in place to reduce or minimise the GHG.		

RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

Requirement Reference:	GHG emissions are identified and assessed for the unit of certification. Plans to reduce or minimize them are implemented, monitored through the Palm GHG calculator and publicly reported.
Objective Evidence:	Whereas the Unit of certification has identified some GHG emissions from different operations, and reports these publicly on Palm GHG, no plan to reduce or minimise the GHG has been developed by Brabanta.
Corrections:	<ol style="list-style-type: none"> 1. Assessing emissions coming from the plantations operations based on national and international emission standards and requirements 2. Creation of a GHG management plan 3. Dissemination of the plan after approval 4. Implement the plan 5. Monitor and evaluate the plan
Root Cause Analysis:	The company did not have all the information needed to complete the GHG plan before the audit due to lack of time.
Corrective Actions:	<ol style="list-style-type: none"> 1. Palm GHG summary is available 2. A GHG management plan is created and validated 3. A dissemination of the plan has taken place through the site by sharing via Outlook to all department heads who will make it widely distributed to employees
Assessment Conclusion:	<ol style="list-style-type: none"> 1. Reviewed a plan captioned "Plan de gestion de Gaz a Effet de Serre" dated 18/10/2021 and approved by the Director general. The document has been shared with the various departmental heads as seen on the plan document. 2. Reviewed the Mill summary report for year 2020 <p>Based on the evidences reviewed the NC is closed.</p>
Effectiveness Closure (for previous audit closed Critical NC):	Brabanta has developed a plan for the management of GHG (Plan de Gestion de Gaz a Effet de Serre, Reference: PGGES, of 10 September 2022), and actions taken to reduce GHG emissions include, implementation of quotas for use of vehicle fuels, and regular control/maintenance of vehicle engines to ensure efficiency. Hence, the critical non-conformity remains closed.

Non-conformity			
NCR Ref #	2111113-202108-M11	Issued Date	03/09/2021
Due Date	02/09/2022	Closure Date	23/12/2021
Indicator & Category (Critical / Minor)	Indicator 3.8.5 (Critical)		
Statement of Nonconformity:	The company's identified person responsible for the implementation of the supply chain model has not received training to implement the applicable supply chain		
Requirement Reference:	<p>The mill shall have written procedures and/or work instructions or equivalent to ensure the implementation of all elements of the applicable supply chain model specified. This shall include at minimum the following:</p> <p>Identification of the role of the person having the overall responsibility for and authority over the implementation of these requirements and compliance with all</p>		

RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

	applicable requirements. This person shall be able to demonstrate awareness of the mill's procedures for the implementation of this standard.
Objective Evidence:	The company has documented procedures to ensure the implementation of all elements of the applicable supply chain model specified. Also, Mr Urbain Mbambu (the RSPO coordinator) has been identified as the person with overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. However, he is yet to receive training to be able to implement the requirement of the SCC
Corrections:	<ol style="list-style-type: none"> 1. Find out about the possibility of taking a training course in French. 2. Follow the online training in French. 3. In the meantime, discuss with colleagues from other subsidiaries who have been trained or who have knowledge of the subject. 4. Visit one of Socfin's subsidiaries to learn how they are implementing the supply chain certification system.
Root Cause Analysis:	The RSPO manager registered for the online training in June 2021 but it was in English and difficult for him to understand since French is the official spoken and written language.
Corrective Actions:	<ol style="list-style-type: none"> 1. Urbain Mbambu, as well as the people involved in supply chain verification, were trained at Brabanta regarding supply chain procedures (on 22/09/2021). 2. Urbain was trained on RSPO 2020 supply chain standards by Thomas Lavreys of SOCFINCO (26/10/2021). 3. Urbain will visit SAFACAM, an RSPO certified site of Socfin, from 6 to 24 November. It will follow supply chain procedures more closely.
Assessment Conclusion:	Mr Urbain received an informal training from the Socfin Sustainability group and during interview with the audit team, he was able to demonstrate knowledge on the implementation of the supply chain procedures. Based on the evidences reviewed the NC is closed
Effectiveness Closure (for previous audit closed Critical NC):	The company has identified personnel critical to the implementation of the Supply Chain Certification Standard (SCCS). They are the sustainability manager, mill manager, weighbridge clerk, RSPO Coordinator, Financial director, Assistant mill manager. The RSPO SCCS Training was conducted on 04/12/2021 and 26/02/2022, attendant by all related personals. The training records were available for verification. Hence, the critical non-conformity remains closed.

Non-conformity			
NCR Ref #	2111113-202108-M12	Issued Date	03/09/2021
Due Date	02/09/2022	Closure Date	23/12/2021
Indicator & Category (Critical / Minor)	Indicator 3.8.6 (Critical)		
Statement of Nonconformity:	The company does not have a documented procedure for internal audits		
Requirement Reference:	Internal Audit i. The mill shall have a written procedure to conduct an annual internal audit to		

RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

	determine whether the mill; ii. Conforms to the requirements in the RSPO SC requirements for mills and the RSPO Rules on Market Communication and Claims
Objective Evidence:	The company does not have a documented procedure for the internal audit and has not conduct any internal audit as of the time of the audit
Corrections:	<ol style="list-style-type: none"> 1. Complete the drafting of the procedure 2. Have the "internal audit" procedure validated 3. Disseminate the procedure 4. Implement the procedure 5. Follow up and control the implementation of the procedure
Root Cause Analysis:	The drafting of the procedure was not finalized or approved by the day of the audit
Corrective Actions:	<ol style="list-style-type: none"> 1. The procedure is finalized 2. The procedure is validated 3. The procedure shall be disseminated 4. A program is established with EF to deliver the training on their next visit 5. An internal audit will be carried out 2-3 months before the surveillance audit
Assessment Conclusion:	<p>Reviewed the company's documented procedure for internal audits for the Supply Chain. The document is captioned "Internal Audit Procedures" dated 22/09/2021 and approved by the Director General. The document as reviewed indicates the internal assessment will be conducted twice in a year and will be done by an external person from the Socfin Sustainability group. The company is in the process of scheduling for its first internal assessment.</p> <p>Based on the evidences reviewed the NC is closed.</p>
Effectiveness Closure (for previous audit closed Critical NC):	Brabanta POM has established a documented procedure for Internal Audit entitled Management Procedure – Internal and External Audit Procedure. Latest internal audit was conducted for RSPO Supply Chain Requirements for Mills as per report Audit Internal Supply Chain dated 16/05/2022 – 23/05/2022. Thus, the critical non-conformity remains closed.

Non-conformity			
NCR Ref #	2111113-202108-M13	Issued Date	03/09/2021
Due Date	02/09/2022	Closure Date	23/12/2021
Indicator & Category (Critical / Minor)	Indicator 3.8.7 (Critical)		
Statement of Nonconformity:	FFB sourced from the communities arrives at the company's weighbridge without any receipts		
Requirement Reference:	Purchasing and Goods In The mill shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFB's received.		
Objective Evidence:	FFB from the estate that are received at the weighbridge comes with receipts. The receipts titled Details on the transport of FFB. Some of the information recorded on the receipt include the source of the FFB, Date, Truck drive and number and tonnage		

RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

	of the FFB However, fruits from the communities that arrives at the weighbridge are not covered by any document.
Corrections:	<ol style="list-style-type: none"> 1. Review the encoding system\ 2. Add to the village fruits receipt slip the origin and routes of the fruits 3. Put in use the existing document (weight, transport, origin, route, date, etc.) 4. Train and sensitize fruits suppliers on how to fill in the dispatch note 5. Train and sensitize the weighbridge operator on the encoding of the dispatch note in the system 6. Monitor and evaluate
Root Cause Analysis:	The existing document containing the traceability of the village fruits was not used for several weeks (weight, transport, origin, route, date, etc.)
Corrective Actions:	<ol style="list-style-type: none"> 1. The slip has been created 2. A meeting was held with all parties concerned 3. An attendance list, photos and a report of the meeting sanctioned the end of the meeting
Assessment Conclusion:	<ol style="list-style-type: none"> 1. The company has designed a form that accompanies the purchase of loose fruits. Copies were made available for review and some of the information captured on the form include: source (village), date, supplier, and weight of the FFB 2. Reviewed minutes of meeting between the company and the loose fruits collectors on the 09/10/2021. The purpose of the meeting was to explain among other things the introduction of the FFB forms for transporting Loose fruits from communities and explain how to fill the form <p>Based on the evidences reviewed the NC is closed</p>
Effectiveness Closure (for previous audit closed Critical NC):	When FFB is delivered to the mill from the Brabanta supply base estates, the transporters presented Delivery Order (DO) to the mill weighbridge clerk in order the FFB to be received by the mill. Records of DO from the FFB Suppliers were available for verification at the Brabanta POM Weighbridge. Hence the critical Non-conformity remains closed.

Non-conformity			
NCR Ref #	2111113-202108-M14	Issued Date	03/09/2021
Due Date	02/09/2022	Closure Date	23/12/2021
Indicator & Category (Critical / Minor)	Indicator 3.8.12 (Critical)		
Statement of Nonconformity:	The company does not have a retention period for their documents		
Requirement Reference:	Record Keeping <ol style="list-style-type: none"> i. The mill shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of these RSPO Supply Chain Certification Standard requirements. 		

RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

	ii. Retention times for all records and reports shall be a minimum of two (2) years and shall comply with relevant legal and regulatory requirements and be able to confirm the certified status of raw materials or products held in stock.
Objective Evidence:	The company keeps records and reports covering all aspects of the RSPO Supply Chain Certification Standard requirements. However the company has no documented procedures covering the retention periods for their reports.
Corrections:	<ol style="list-style-type: none"> 1. Implement the supply chain management procedure 2. Train and sensitize all relevant staff 3. Keep records for a period of two years
Root Cause Analysis:	The procedure exists but we could not demonstrate that the records were effective, the supply chain management procedure not implemented on the day of the audit
Corrective Actions:	<ol style="list-style-type: none"> 1. The procedure was broadcast via Outlook 2. Training on the implementation of the procedure has taken place 3. An attendance list sanctioning the participation of the persons concerned is established
Assessment Conclusion:	<ol style="list-style-type: none"> 1. Review the company's document captioned "Procedure De Gestion De La Chaîne D' Approvisionnement Et De La Tracabilite" dated 07/07/2021 and approved by the Director General. The document indicates all records will be kept for a period of 5 years. 2. Reviewed records on training for the implementation of the procedures. Topic: Implementation of the Supply Chain Date: 04/12/2021 Attendance: 7 workers involved in the implementation of the procedure. Based on the evidences reviewed the NC is closed
Effectiveness Closure (for previous audit closed Critical NC):	Brabanta POM have kept records such as Supply Chain Procedures, SCCS Internal Audits, SCCS Trainings, Mass Balance Records and FFB Receive Notes that were available for verification. The records are kept for 2 years as per own SOP, Standard Operation Procedure for "Procedure De Gestion De La Chaîne D' Approvisionnement Et De La Tracabilite" dated 07/07/2021. Records for the year 2021 were sampled and available for verification. Hence the critical non-conformity remains closed.

Non-conformity			
NCR Ref #	2111113-202108-M15	Issued Date	03/09/2021
Due Date	02/09/2022	Closure Date	23/12/2021
Indicator & Category (Critical / Minor)	Indicator 3.8.9 (Critical)		
Statement of Nonconformity:	None of the contracts for the transporters contains the requirements as demanded by the indicator		
Requirement Reference:	Outsourcing Activities i. The mill shall not outsource its milling activities. In cases where he mill outsources activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the mill holding the certificate		

RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

	<p>shall ensure that the independent third party complies with relevant requirements of this RSPO Supply Chain Certification</p> <p>ii. The mill shall ensure the following:</p> <ol style="list-style-type: none"> a. The mill has legal ownership of all input material to be included in outsourced processes b. The mill has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The onus is on the mill to ensure that certification body (CB) has access to the outsourcing contractor or operation if an audit is deemed necessary. c. The mill has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor. <p>The mill shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to their respective operations, systems, and all information, when this is announced in advance.</p>
<p>Objective Evidence:</p>	<p>The company outsources the transportation of FFB from their estate to the mill. There are currently 6 FFB contract transporters and all have a contract with company.</p> <p>A Reviewed of sampled contracts for the transporters did not identify any of the requirements as stated in the indicator. Also there are no documented control system in place for the outsourced process.</p>
<p>Corrections:</p>	<ol style="list-style-type: none"> 1. Create a procedure for managing subcontracting based on the existing Congolese law on subcontracting. 2. Convene a meeting with all transport operators at the end of the current exclusive contract and terminate it 3. Present the new contract with all requirements: HSE-RSPO and legal 4. Explain all these requirements to everyone 5. Have all transporters sign the contract 6. The contract is signed in duplicate for each carrier 7. Conduct regular monitoring and evaluation with all transporters to ensure compliance with the contract based on the checklist 8. Develop an action plan for corrective measures in case of non-compliance 9. Follow up on the implementation of corrective measures
<p>Root Cause Analysis:</p>	<p>The company took the decision to wait until the old contracts have expired, to include the clauses into the new contracts, which will be open to other businesses.</p>
<p>Corrective Actions:</p>	<ol style="list-style-type: none"> 1. A contract has been created and validated 2. The agreement is being validated 3. Since the first contract will end on November 11, 2021, a call for tenders will be launched to select the future carriers who will sign the new agreement with all the requirements. 4. A meeting will be organized between the potential transporter and the management of the Brabantia to explain the convention. 5. Signature of the agreement between the two parties

RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

Assessment Conclusion:	The contracts for the transportation of FFB by the third party Contractors from the plantations to the mill has expired and the company has sent a call for tender for the transportation of FFB. The call for tender was made available to the audit for review and it meets the requirements of the indicator. Based on the evidences reviewed the NC is closed
Effectiveness Closure (for previous audit closed Critical NC):	Brabanta POM does not outsource any of the activities. Transportation of CPO is by the buyer themselves as well, therefore the responsibility of the mill ends at the mill exit point. Hence this critical non-conformity remains closed.

Non-conformity			
NCR Ref #	2111113-202108-N1	Issued Date	03/09/2021
Due Date	ASA 1	Closure Date	11/01/2023
Indicator & Category (Critical / Minor)	Indicator 3.7.3 (Minor)		
Statement of Nonconformity:	There are no evidence of training for personnel implementing the Supply Chain Certification Standard (SCCS).		
Requirement Reference:	Appropriate training is provided for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS). Training is specific and relevant to the task(s) performed		
Objective Evidence:	The company has identified personnel critical to the implementation of the Supply Chain Certification Standard (SCCS). They include the mill manager, weighbridge clerk, RSPO Coordinator, Financial director, Assistant mill manager. However there are no evidence of training for the personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS).		
Corrections:	<ol style="list-style-type: none"> 1. Organize an introductory meeting for staff essential to the implementation of the supply chain certification standard 2. Train these staff on the implementation of the standard 3. Implement the supply chain management procedure starting with training these staff on the supply chain management procedure 4. Create monitoring and evaluation documents for the procedure 5. Evaluate the staff directly responsible for implementation on a regular basis as needed 6. Evaluate the implementation of the procedure 		
Root Cause Analysis:	Supply Chain management procedure not yet implemented, staff identified to be in charge of implementation not yet informed of their responsibility, no meeting held with them		
Corrective Actions:	<ol style="list-style-type: none"> 1. A training meeting was held with the financial director, mill director, weighbridge clerk and personnel responsible for sustainable development. 2. A training in December 2021 with the participation of: mill manager assistant, division 1 section chiefs, weighbridge clerk, financial director. 3. Pending modification of the weighbridge encoding file to allow the system to state if the FFB is coming from a certified or non-certified area. 		

	4. A checklist is being developed to monitor and evaluate the implementation of the procedure
Assessment Conclusion:	The company has identified personnel critical to the implementation of the Supply Chain Certification Standard (SCCS). They are the mill manager, weighbridge clerk, RSPO Coordinator, Financial director, Assistant mill manager. The RSPO SCCS Training was conducted on 04/12/2021 and 26/02/2022, attendant by all related personals. The training records were available for verification. Hence the minor non-conformity is closed on 11/01/2023.

Non-conformity			
NCR Ref #	2111113-202108-N2	Issued Date	03/09/2021
Due Date	11/01/2023	Closure Date	11/01/2023
Indicator & Category (Critical / Minor)	Indicator 6.2.6 (Minor)		
Statement of Nonconformity:	The company is paying a minimum wage which is a result of a unilateral decision by the company and in direct violation of the directive from government		
Requirement Reference:	A DLW is paid to all workers, including those on piece rate/quotas, for whom the calculation is based on achievable quotas during regular work hours.		
Objective Evidence:	Congo DR has a National daily minimum wage declared by the government in 2019 of 7,075 Congolese Franc. However, there was a follow up directive from the government to corporations in the agricultural sector indicating they can review the daily rate in consultations with the workers' representatives. Brabanta has a daily rate that they pay to the workers. However this was not reached in consultations with the workers representative as required by the directives.		
Corrections:	<ol style="list-style-type: none"> 1. Convene a meeting with the union 2. Present the old and current pay scale 3. Explain the reasons for this scale in relation to the company's situation 4. Present the project of adjustment in relation to the company's productivity 5. Have the old and new pay scales signed and archived as proof of the agreements 		
Root Cause Analysis:	Lack of communication, misinterpretation and misunderstanding from the trade unions, lack of training and information on the role and responsibility of trade unions towards the company and employees		
Corrective Actions:	<ol style="list-style-type: none"> 1. A meeting with the delegates was organized 2. The financial situation of the Brabanta explained and showed the reasons for the scale to be as it is 3. A salary scale is proposed to the delegates with a project of adjustment if possible 4. Wage scale approved by the workers' delegates and implemented by Brabanta 		
Assessment Conclusion:	1. Interview with representatives of the workers during the audit period confirmed meeting with management to discuss the new salary scale for the workers.		

	<p>2. Reviewed previous salary scale use for determining workers' salary. They are dated October 2021 and April 2022</p> <p>3. Reviewed a new salary scale which will guide the salary determination for the workers captioned Grille Salariale October 2022. This updated salary grade has the signatures of all the workers representatives and management which confirms the new salary grade was developed in consultations with the</p> <p>Hence the minor non-conformity is closed on 11/01/2023.</p>
--	-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

Non-conformity			
NCR Ref #	2111113-202108-N3	Issued Date	03/09/2021
Due Date	11/01/2023	Closure Date	11/01/2023
Indicator & Category (Critical / Minor)	Indicator 6.3.2 (Minor)		
Statement of Nonconformity:	Management does not share copies of the minutes of meetings with the workers' representatives		
Requirement Reference:	Minutes of meetings between the unit of certification with trade unions or workers representatives, who are freely elected, are documented in national languages and made available upon request		
Objective Evidence:	<p>Brabanta Palm Oil Mill has a file for all minutes of meetings held between management with the Union executives. The company in every three months hold meetings with the union. The last meeting between management and workers' union was on 24th April 2021. Copies of the minutes of meetings were seen and reviewed by the audit team.</p> <p>However, management could not provide any evidence to support their argument as to why copies of the meetings cannot be shared with the workers' union</p>		
Corrections:	<ol style="list-style-type: none"> 1. Organize a meeting with the trade union 2. Present the legal and official procedure for issuing minutes 3. Get previous minutes signed 4. Give a copy of each minutes to the delegation 5. Issue an acknowledgement of receipt 6. Acknowledge receipt of signed minutes 7. Archive the signed minutes Do the same for the future 		
Root Cause Analysis:	Miscommunication, lack of information on legal and official procedure by the union, lack of control of union role and responsibility, lack of training and information by the union		
Corrective Actions:	<ol style="list-style-type: none"> 1. A meeting was organized with the union delegation 2. The legal process of the procedure was presented to the delegates 3. The previous minutes were signed by the delegates 4. A copy of each minute was given to the delegates with acknowledgement of receipt 5. The minutes are archived at the Human Resources level 		

RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

Assessment Conclusion:	<ol style="list-style-type: none"> 1. Reviewed a letter dated 19/05/2022 from the Human Resource manager for Brabanta SA to the workers' representatives. The letter sort to remind the workers representatives of the meeting they had on the 06/05/2022 and the need for them to acknowledge receipt of the records and revert to copies to the administration office 2. Reviewed record of special meeting between the workers' representatives and management on the 06/05/2022 with attendance records. The meeting was about the welfare of the workers and other conditions of the workers. 3. Interview with the workers' representatives during the audit period confirmed copies of the meeting records was made available to them. <p>Hence the minor non-conformity is closed on 11/01/2023.</p>
-------------------------------	-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

Non-conformity			
NCR Ref #	2111113-202108-N4	Issued Date	03/09/2021
Due Date	11/01/2023	Closure Date	11/01/2023
Indicator & Category (Critical / Minor)	Indicator 6.4.1 (Minor)		
Statement of Nonconformity:	Review of the company's child labour policy shows there are no remediation plans included in the policy and also some of the contracts review did not have any clause on the prohibition on child labour		
Requirement Reference:	A formal policy for the protection of children, including prohibition of child labour and remediation is in place, and included into service contracts and supplier agreements		
Objective Evidence:	<p>The company has a documented child labour policy dated 13th August 2019. The policy defines Child labour as work that deprives children of their childhood, potential harm and dignity, and which is detrimental to their physical and mental development.</p> <p>However the policy has no remediation process in place to deal with any identified child labour in their operations. Also a review of the contract between the company and Mr Jean Marie Ilongo did not identify any clause on the prohibition on child labour</p>		
Corrections:	<ol style="list-style-type: none"> 1. J. Marie is a consultant in charge of training members of the communities in beekeeping as an alternative income generating activity, he works alone and does not recruit 2. Have the Brabanta RSPO and HSE requirements protocol signed by all service providers 3. Although Brabanta has a strict recruitment system in place requiring ID before hiring, regularly check workers to ensure that no minors are employed in any of Brabanta's operations. 4. Extend the same control to service providers 5. Strengthen the lockdown by implementing a formalized system of control at the time of hiring. 6. Sensitize and raise awareness of the age verification system before hiring 		

RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

Root Cause Analysis:	Mr. Jean Marie Ilongo has not signed a contract that includes the policies (child labour, forced labour), however this service provider is a trainer working alone in his organisation. At Brabanta, age verification before hiring is carried out, the age is indicated on the work contract, but there is a lack of information and awareness, and a lack of formalisation of the verification mechanism during hiring
Corrective Actions:	<ol style="list-style-type: none"> 1. Jean Marie ILONGO's contract was terminated to resume at a later date due to the lack of a person to follow these activities 2. A memorandum of understanding on the requirements of subcontracting has been signed by all service providers in which is included the obligation by the providers not to employ any person under the age of 18 as required by law and is stated in the child protection policy 3. Regular inspections are carried out by the HSE team to verify the presence of minors in each worksite 4. Awareness and popularization of the child protection policy 5. A remediation procedure will be drafted and implemented in collaboration with the Earthworm Foundation by July 2022
Assessment Conclusion:	<ol style="list-style-type: none"> 1. Reviewed a document captioned Procedure for the Remediation of child labour dated 22/04/2022 and approved by the Director General. The objective of the procedure is to eradicate child labour in the operations of Brabanta SA. 2. Reviewed records of inspection by the HSE to verify the presence of children in each worksite. The record captioned Profile of Workers and it has information on the name, age, occupation among others. 3. Interview with sampled workers and the workers' representatives indicates, the company has sensitized them on the procedure. <p>Hence the minor non-conformity is closed on 11/01/2023.</p>

Non-conformity			
NCR Ref #	2111113-202108-N5	Issued Date	03/09/2021
Due Date	11/01/2023	Closure Date	11/01/2023
Indicator & Category (Critical / Minor)	Indicator 6.5.3 (Minor)		
Statement of Nonconformity:	The company does not have documented reports on engagements with nursing mothers		
Requirement Reference:	Management has assessed the needs of new mothers, in consultation with the new mothers, and actions are taken to address the needs that have been identified		
Objective Evidence:	<p>During interview with the women in the plantations they did indicated that there has been a meeting to know their needs and actions has been taken to address their needs.</p> <p>However, they are no documented report on the needs assessment conducted or any other report on engagements with the nursing mothers.</p>		
Corrections:	<ol style="list-style-type: none"> 1. Raising awareness about the rights and needs of new mothers. 2. Organise meetings with women as needed. 3. Record and archive all sensitizations and meetings (Record meetings). 		

RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

	<ol style="list-style-type: none"> 4. Create a meeting agenda, Create standard meeting minutes. 5. Follow up on the recommendations of each meeting.
Root Cause Analysis:	No formal recording, no minutes of meetings, no records of sensitizations.
Corrective Actions:	<ol style="list-style-type: none"> 1. A meeting was held to discuss the needs of new mothers. 2. Minutes of the meetings are prepared and available. 3. An action plan is drafted based on the conclusions of the meeting. 4. The discussed actions are implemented and sensitization meetings are organized by the gender committee to sensitize women on the subject. 5. An annual program of meetings with women is established. 6. The sustainable development responsible is committed to monitoring the progress of meetings between the gender committee and women working in Brabanta.
Assessment Conclusion:	<ol style="list-style-type: none"> 1. Reviewed records of sensitization and assessment on the needs of new mothers dated 08/12/2022 at the kadima estate for 24 workers. Pictorial evidences of the sensitization was also made available for review 2. Reviewed an action plan developed based on the meeting with the lactating mothers. The action plan provides solutions to all the problems presented by the new mothers during the meeting with Gender committee. The solution includes building a tent for the new mothers to keep their babies during working hours 3. The gender committee has developed a program for the year which outlines the activities to be implemented for the years. <p>Hence the minor non-conformity is closed on 11/01/2023.</p>

Non-conformity			
NCR Ref #	2111113-202108-N6	Issued Date	03/09/2021
Due Date	11/01/2023	Closure Date	11/01/2023
Indicator & Category (Critical / Minor)	Indicator 7.8.3 (Minor)		
Statement of Nonconformity:	There are no reports on BOD/COD analysis of its mill effluents discharged.		
Requirement Reference:	Mill effluent is treated to be in compliance with national regulations. Discharge quality of mill effluent, especially Biochemical Oxygen Demand (BOD), is regularly monitored.		
Objective Evidence:	<p>The unit of certification has constructed a system made of 5 lagoons (1 for cooling, 2 for anaerobic digestion, and 2 for aerobic digestion) and one wastewater retention basin.</p> <p>However, no BOD/COD analyses are conducted to determine the efficiency of the lagoon treatment system. Moreover, the waste water retention basin at the end of the lagoon system has some leakages, hence there is possible contamination of adjacent Kasai River, especially considering that BOD/COD assessments are not done.</p>		

RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

	Interviews with Company staffs revealed that laboratory equipment for BOD and COD analyses have been sourced but testing of the mill effluent is yet to begin.
Corrections:	<ol style="list-style-type: none"> 1. Make available the first analysis made during the ESIA's that were not yet available at the time of the audit 2. Train the lab staff in the use of the equipment 3. Install the equipment 4. As soon as possible, start doing the analysis in-house 5. Have third party analysis done to compare results 6. Implement actions to resolve any deviations from the national standard 7. Follow up on recommendations
Root Cause Analysis:	The effluent water analysis equipment was received in July 2021, the analysis equipment was not yet installed at the time of the audit, the staff was not trained, the results of the analysis carried out by the expert company "le carnet" were not yet available at the time of the audit.
Corrective Actions:	<ol style="list-style-type: none"> 1. Effluent analyses done by CARNET are available 2. A BOD-COD analysis kit is purchased and installed 3. Personnel responsible for performing the analyses are trained 4. The first analyses are done and the results are available 5. Samples are sent to the OCC lab to compare results
Assessment Conclusion:	<p>Brabanta have installed BOD-COD analysis kit which was available for verification during the assessment. The laboratory staffs have been provided sufficient training to conduct inhouse analysis of BOD-COD. Records of inhouse BOD-COD analysis was available for verification as well.</p> <p>Brabanta S.A have also conducted independent BOD and COD Analysis with the reports available for verification. Analysis was done by Universite Dekinshasa, Department de Chimie, Laboratoire de Chimie Analytique. The report " Resultats D'analyses des Echantillons des Boues" (Reference Number: LA11/023/05/21) dated 19/05/2021 was available for verification. The results were compared with the inhouse results and indicated that the BOD and COD were within the standard parameters.</p> <p>Hence the minor non-conformity is closed on 11/01/2023.</p>

Non-conformity			
NCR Ref #	2111113-202108-N7	Issued Date	03/09/2021
Due Date	11/01/2023	Closure Date	11/01/2023
Indicator & Category (Critical / Minor)	Indicator 7.9.1 (Minor)		
Statement of Nonconformity:	There are no evidence of implementation of the plan to optimize renewable energy		
Requirement Reference:	A plan for improving efficiency of the use of fossil fuels and to optimize renewable energy is in place, monitored and reported.		

Objective Evidence:	Brabanta has developed an action plan for the reduction of use of fossil fuels (Plan d'Actions pour la Reduction de l'Utilisation des Energies Fossiles, with document Ref.: PREF, Index 00, of 23/07/2021). However, this plan is neither being implemented, monitored, nor reported.
Corrections:	<ol style="list-style-type: none"> 1. Implementation of the action plan to reduce the use of fossil fuels 2. Monitoring the plan 3. Evaluate the effectiveness of actions 4. Take corrective action as a result 5. Follow-up of actions resulting from the fossil fuel use plan
Root Cause Analysis:	The fossil fuel plan was developed at the end of July 2021, the plan has just been created, only a month old and at the time of the audit the plan had not yet been implemented
Corrective Actions:	<ol style="list-style-type: none"> 1. A corrective action plan is developed to implement the management plan 2. Deadlines are set by the relevant departments 3. Actions are monitored by Health Safety and Environment Responsible and Sustainable Development Responsible 4. Implemented actions will be evaluated and monitored every six months
Assessment Conclusion:	<p>As a means to improving efficiency of the use of fossil fuels, Brabanta has developed an action plan for the reduction of use of fossil fuels (Plan d'Actions pour la Reduction de l'Utilisation des Energies Fossiles, with document Ref.: PREF, Index 00, of 23/07/2021).</p> <p>To reduce use of generator fuel, Brabanta has put in a place a schedule for energy provision to housing units. This entails providing energy when it is absolutely required and switching off as required. For instance, power is supplied in the mornings to permit workers prepare for work and children for school, after which power is cut. As a rule power is also cut after 10 p.m. until 6 a.m. in the morning.</p> <p>Other means used to reduce fossil fuel use include, providing fuel quotas for different vehicles/departments, regular maintenance of vehicles/machines, tractors and trucks to improve their efficiency. Monthly reports were seen during the audit.</p> <p>Hence the minor non-conformity is closed on 11/01/2023.</p>

Non-conformity			
NCR Ref #	2111113-202108-N8	Issued Date	03/09/2021
Due Date	11/01/2023	Closure Date	11/01/2023
Indicator & Category (Critical / Minor)	Indicator 2.2.1 (Minor)		
Statement of Nonconformity:	The company list of contractors does not include all the contractors and their details		
Requirement Reference:	A list of contracted parties is maintained		
Objective Evidence:	Brabanta maintain a list of which include some of its contracted parties. This list indicates the name of the contractor and whether it comply with the company's		

RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

	<p>requirements or not. This list however does not include all contracted parties and does not</p> <ul style="list-style-type: none"> • provide any other details to enable the determination of those providing operational services to the site? • Labour including the following: <ul style="list-style-type: none"> i. Temporary employment ii. Short-term contracts; renewable contract iii. Fixed-term, project, task-based contracts or casual work iv. Loose Fruit collectors/ suppliers
Corrections:	<ol style="list-style-type: none"> 1. Revise the list of all the contracting parties, including the type of service that each party provides to Brabanta, the relationship with Brabanta, the duration of the contract and the type of contract 2. To include other contractors such as suppliers of loose fruit 3. Regularly update the list 4. Follow up on the updating of the list
Root Cause Analysis:	Omission of an activity column when creating the table. No precision on the nature of the contract with suppliers and other contractors, some contractors such as harvesters and suppliers of loose fruit do not appear in a particular way on the list of contractors
Corrective Actions:	<ol style="list-style-type: none"> 1. The list of stakeholders has been updated 2. The suppliers of the nuts have been included 3. Updates will be made quarterly. 4. Follow-up updates will be done every six months
Assessment Conclusion:	<ol style="list-style-type: none"> 1. Reviewed an updated stakeholder list 2023 available for verification. 2. The list has information on the stakeholders including name, email address, contact and the location of the stakeholders. <p>Hence the minor non-conformity is closed on 11/01/2023.</p>

Non-conformity			
NCR Ref #	2111113-202108-N9	Issued Date	03/09/2021
Due Date	11/01/2023	Closure Date	11/01/2023
Indicator & Category (Critical / Minor)	Indicator 2.2.2 (Minor)		
Statement of Nonconformity:	Some of the contracts reviewed does not contain clause on meeting applicable legal requirements		
Requirement Reference:	All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal requirements, and this can be demonstrated by the third party.		
Objective Evidence:	Brabanta did not have contracts for all of its contracted third parties including its Loose Fruits Collectors to include specific clauses on meeting legal requirements. For example, for its Loose Fruit Collectors (LFCs), the company has a document "Achat Noix Villageouses of 17 August 2020" which was provided as its contact LFCs. However, this document does not include clauses on compliance with applicable		

RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

	legal requirements. The company's monitoring records also confirmed not all contracted parties were complying with applicable legal requirements.
Corrections:	<ol style="list-style-type: none"> 1. Revise the protocol on the purchase of village loose fruits by integrating the clauses of the legal requirements 2. Organize a meeting with all harvesters and suppliers of loose fruits 3. Discuss and finalize the protocol with the participation of the harvesters and suppliers of loose fruits , or their representatives 4. Post the protocol in each village, signed by the representatives and the Brabanta management. 5. Review the Village loose fruits purchase protocol of 17 August 2020 by integrating clauses relating to compliance with applicable legal requirements (child and forced labour).
Root Cause Analysis:	Training and registration of villagers on clauses relating to compliance with applicable legal requirements (child labour and forced labour) were done but these clauses are not included in the contract "Protocole". The "Protocol" signed between Brabanta and the representatives does not contain any legal clauses.
Corrective Actions:	<ol style="list-style-type: none"> 1. A meeting between the loose fruit collectors and the Public Relations and Communications Department. 2. Discussions are held with the interested parties, which lead to a compromise in the form of a protocol or contract for the purchase of loose fruits from the communities. 3. The contract is shared with all communities involved. 4. The contract is posted on the bulletin board in each village .
Assessment Conclusion:	<ol style="list-style-type: none"> 1. Reviewed contract of agreement for FFB purchases between the company and the FFB suppliers dated 08/10/2021. 2. Reviewed records of sensitization of the agreement to their FFB suppliers with signed records of participation and receipt of copies of the agreement. <p>Hence the minor non-conformity is closed on 11/01/2023.</p>

Non-conformity			
NCR Ref #	2111113-202108-N10	Issued Date	03/09/2021
Due Date	11/01/2023	Closure Date	11/01/2023
Indicator & Category (Critical / Minor)	Indicator 2.2.3 (Minor)		
Statement of Nonconformity:	Some of the contract documents reviewed does not clauses disallowing child, forced and trafficked labour		
Requirement Reference:	All contracts, including those for FFB supply, contain clauses disallowing child, forced and trafficked labour. Where young workers are employed, the contracts include a clause for their protection		
Objective Evidence:	Brabanta did not have contracts for all of its contracted third parties including its Loose Fruit Collectors (LFCs) to include clauses disallowing child, forced and trafficked labour. For example, the company does not have FFB suppliers but LFCs who collect Palm fruits from the wild and sell to the company. LFCs confirmed that		

RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

	<p>collection is mostly done at the family level which includes children with their parents. The company has a document "Achat Noix Villageouses of 17 August 2020" which was provided as its contract with LFCs. However, this document does not include clauses disallowing child, forced and trafficked labour and clauses for the protection for children who help their parents in loose fruit collection. The company provided evidence of sensitization trainings carried out on this RSPO indicator in the communities. However, sample of LFCs who met with the audit team denied of any knowledge on these trainings or knowledge of the "purchase agreement".</p>
Corrections:	<ol style="list-style-type: none"> 1. Insert the clauses prohibiting child labour, forced labour and human trafficking in the policies to be disseminated 2. Popularise this protocol and have it signed by those concerned 3. Sensitise the harvesters supplying fruits on the prohibition of child labour, forced labour and human trafficking in the work related to the sale of fruits to Brabanta 4. Follow-up 5. Conduct regular evaluation to ensure that monitoring is done properly and correctly. 6. Review the protocol "Achat Noix Villageoises du 17 août 2020". 7. Disseminate the protocol ,Raise awareness among collectors
Root Cause Analysis:	<p>Training and registration of villagers on clauses relating to compliance with applicable legal requirements. (Child and forced labour) but these clauses are not included in the 'Protocol' contract, as there is no control over the harvesters supplying the fruits during harvesting operations and sales of loose fruits at village level because for Brabanta the agreement covers the weighbridge and the port, Brabanta does not monitor what happens at village level during harvesting operations and the transport of fruits</p>
Corrective Actions:	<ol style="list-style-type: none"> 1. Clauses prohibiting child labor and human trafficking have been included in the contract 2. Meetings to disseminate the protocol to the communities have been held 3. The protocol has been reviewed and distributed to all interested parties 4. Brabanta will conduct regular monitoring visits to ensure that their supply base follows the agreed regulations. 5. Awareness-raising sessions are regularly held with the cutters who supply loose fruits
Assessment Conclusion:	<ol style="list-style-type: none"> 1. Reviewed contract of agreement for FFB purchases between the company and the FFB suppliers dated 08/10/2021. 2. Review of the agreement shows a clause prohibiting the use of children below the age of 18 years in their operations. 3. Reviewed records of sensitization on the policy prohibiting the use of children to the FFB suppliers. <p>Hence the minor non-conformity is closed on 11/01/2023.</p>

Non-conformity			
NCR Ref #	2111113-202108-N11	Issued Date	03/09/2021

RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

Due Date	11/01/2023	Closure Date	11/01/2023
Indicator & Category (Critical / Minor)	Indicator 3.3.2 (Minor)		
Statement of Nonconformity:	Most of the workers interviewed are not aware of RSPO		
Requirement Reference:	A mechanism to check consistent implementation of procedures is in place.		
Objective Evidence:	<p>Brabanta’s mechanism for checking consistent implementation of its procedures has not been done to cover all relevant procedures and the existing mechanism was found not to be effective. The company uses training, monitoring and evaluation to check the effectiveness of the implementation of its procedures. It has general procedures for handling non-conformities which applies to the results of monitoring and evaluation (procedures de traitement de non-conformites reeles ou potentielle of 18/06/2015. However, this monitoring and evaluation of the effectiveness of the implementation of the company’s procedures has not been carried out in all relevant units /operations of the company. For example, though there is an existing form of an action plan for non-conformities of SK Protection, the company had not carried out any monitoring and evaluation for this contracted party. Field observations by the audit team in the presence of the managers sighted several instances of workers’ practices inconsistent with the company’s procedures. For example, in N11, the manner FFB carriers’ were carrying their matchets and the cutting of FFB stack by harvesters among other examples were all found not to be consistent with the company’s procedures.</p> <p>Most workers both in the mill and in the field asked what is RSPO?</p>		
Corrections:	<ol style="list-style-type: none"> 1. Strengthen communication and intensify information meetings to explain what RSPO is 2. Establish an effective RSPO communication system to attract the attention of all staff to the RSPO 3. Information about RSPO concepts disseminated by the sustainability management department should be relayed to other departments by all departments by all responsible persons. 4. Set up a communication system that allows the transmission of information throughout the chain of command to make RSPO-related information easy to understand and accessible 5. Continue ensuring all workers receive training on their respective procedures 6. Conduct regular monitoring to ensure all workers follow their procedures 7. Draft and implement an action plan where non-conformities are observed 		
Root Cause Analysis:	Lack of follow-up on the acquisition of RSPO knowledge , the RSPO communication system put in place is not effective, lack of interest in the RSPO process by a large part of the staff, especially the workers, lack of circulation of information transmitted by the sustainable development management department		
Corrective Actions:	<ol style="list-style-type: none"> 1. RSPO re-dissemination and explanation meetings are integrated into the outreach program 2. A meeting is held to re-explain the RSPO message to department heads 3. Training on RSPO is planned. The sustainable development department trains managers who in turn train employees 		

	<ol style="list-style-type: none"> 4. Awareness is raised during morning calls 5. Regular trainings are held to ensure the workers understand their procedures 6. Regular monitoring on procedure implementation will be done. Actions plans are written and implemented where non-conformities are observed.
Assessment Conclusion:	<p>Brabanta has mechanism in place to ensure the consistent implementation of its SOPs. This mechanism includes a diffusion of procedures, sensitization, training, monitoring, internal audits and evaluation of implementation among other approaches. In terms of diffusion, procedures are sent to the relevant workers to read and sign as having read. Latest internal audit was conducted from 16/05/2022 – 23/05/2022.</p> <p>The company also used the weekly Tool Box Talks specific to each department and daily briefings done by supervisors at each work site. For monitoring and evaluation of implementation of the procedures, an evaluation is done using the evaluation sheet for each procedures every 6 month and records are kept, sample of which were reviewed. Whenever there is non-conformance with the procedures, another training is given. Company has general procedures for handling non-conformities which applies to the results of monitoring and evaluation (procedures de traitement de non-conformites reeles ou potentielle of 18/06/2015.</p> <p>Interview with workers indicated that they are aware of RSPO. They are also aware on the company’s procedures on safe work. Verification done on the operations indicated that procedures were followed accordingly.</p> <p>Hence the minor non-conformity is closed on 11/01/2023.</p>

Non-conformity			
NCR Ref #	2111113-202108-N12	Issued Date	03/09/2021
Due Date	11/01/2023	Closure Date	11/01/2023
Indicator & Category (Critical / Minor)	Indicator 5.1.1 (Minor)		
Statement of Nonconformity:	The company has not made the current and previous prices publicly available to the Loose Fruit Collectors		
Requirement Reference:	Current and previous period prices paid for FFB are publicly available and accessible by smallholders.		
Objective Evidence:	Brabanta did not make current and previous prices paid to Loose Fruit Collectors (LFCs) publicly available and accessible. The company does not have FFB suppliers but source from LFCs. The company provided a document "Achat Noix Villageouses of 17 August 2020" from its office which contained the current price as evidence for this requirement. Though LFCs interviewed were aware of the previous and the current prices paid to them, the evidence provided by the company from its office did not meet this requirement for making the current and previous prices paid to LFCs publicly available and accessible.		
Corrections:	<ol style="list-style-type: none"> 1. Create a document that traces the history of fruits prices from 2019 onwards in the local language 2. Hold a meeting with the fruits harvesters and present the document to them in the form of a table 3. Discuss with the collectors (local language) 		

RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

	4. Post all prices to make them accessible to all															
Root Cause Analysis:	Prices were not recorded, some of the fruits harvesters did not admit to being informed of prices, representatives and village leaders did not communicate the price to others															
Corrective Actions:	<ol style="list-style-type: none"> 1. A table of price changes since 2019 is created. 2. The document was presented at a meeting 3. The document was posted in each village, at the weighbridge and at Beach Brabanta 4. The document will be updated with every price change 															
Assessment Conclusion:	<p>Current and previous period prices are publicly displayed at the weighbridge office for the reference of the FFB suppliers mainly Village FFB Collectors (<i>Collecteurs villageois de FFB</i>). During the visit to the mill weighbridge, the FFB Price was displayed as below.</p> <table border="1" style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th colspan="5" style="text-align: center;"><i>TABLEAU D'EVOLUTION PRIX D'ACHAT NOIX VILLAGEOISES</i></th> </tr> <tr> <th style="text-align: center;">Annee</th> <th style="text-align: center;">2019</th> <th style="text-align: center;">2020</th> <th style="text-align: center;">2021</th> <th style="text-align: center;">2022</th> </tr> </thead> <tbody> <tr> <td style="text-align: center;">Montant</td> <td style="text-align: center;">FC 5.000</td> <td style="text-align: center;">FC 6.000</td> <td style="text-align: center;">FC 6.500</td> <td style="text-align: center;">FC 6.5000</td> </tr> </tbody> </table> <p>Hence the minor non-conformity is closed on 11/01/2023.</p>	<i>TABLEAU D'EVOLUTION PRIX D'ACHAT NOIX VILLAGEOISES</i>					Annee	2019	2020	2021	2022	Montant	FC 5.000	FC 6.000	FC 6.500	FC 6.5000
<i>TABLEAU D'EVOLUTION PRIX D'ACHAT NOIX VILLAGEOISES</i>																
Annee	2019	2020	2021	2022												
Montant	FC 5.000	FC 6.000	FC 6.500	FC 6.5000												

Non-conformity			
NCR Ref #	2111113-202108-N13	Issued Date	03/09/2021
Due Date	11/01/2023	Closure Date	11/01/2023
Indicator & Category (Critical / Minor)	Indicator 5.1.5 (Minor)		
Statement of Nonconformity:	The company could not demonstrate they have a contract with an agreed time frame with the Loose Fruit Collectors		
Requirement Reference:	Contracts are fair, legal and transparent and have an agreed timeframe.		
Objective Evidence:	Brabanta did not demonstrate to have contract with Loose Fruit Collectors (LFCs) which is legally enforceable with agreed time frame. The company provided evidence of a "purchase agreement" (Achat Noix Villageouses of 17 August 2020) with LFCs signed by the General Manager. However, it could not justify what makes the Achat Noix Villageouses a legal document. Apart from the company's General Managers signature, the document has signatures of "representatives of the communities" who according to the company is evidence that the signees have "seen the document". The document also had no time frame. Representatives of LFCs invited by the company to meet with the audit team said they have no idea of the existence of the document.		
Corrections:	<ol style="list-style-type: none"> 1. Organize a meeting with all the fruits harvesters suppliers 2. Present the village fruits purchase protocol to the harvesters suppliers 3. Discuss the document to get the consent of the fruit harvesters 4. Have the document approved by all parties involved. 5. Share the document for wide distribution 		

RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

	6. Have collectors sign the protocol
Root Cause Analysis:	All representatives of the collectors have signed the protocol but one of the documents presented to the auditors only had the signature of the Director General of Brabanta and the auditors thought that this document was not legal
Corrective Actions:	<ol style="list-style-type: none"> 1. A meeting was held with the loose fruit collectors and their representatives 2. A price setting procedure was created with the consent of all. A consensus was reached after a few hours of discussion 3. The procedure was adopted by all participants 4. The procedure is shared and posted in the communities 5. The protocol was signed by the community representatives by December 2022
Assessment Conclusion:	The contract agreement entitled <i>Contract D'Achat Noix Villageois</i> dated 08/10/2021 between Brabanta and the Village FFB Collectors did not have an agreed timeframe stated in it. Since, this is a reoccurrence of minor non-conformity, a critical non-conformity was raised.

Non-conformity			
NCR Ref #	2111113-202108-N14	Issued Date	03/09/2021
Due Date	11/01/2023	Closure Date	11/01/2023
Indicator & Category (Critical / Minor)	Indicator 6.7.2 (Minor)		
Statement of Nonconformity:	Some of the workers interviewed during the audit period could not demonstrate knowledge on the procedures		
Requirement Reference:	Accident and emergency procedures are in place and instructions are clearly understood by all workers. Accident procedures are available in the appropriate language of the workforce. Assigned operatives trained in first aid are present in both field and other operations, and first aid equipment is available at worksites. Records of all accidents are kept and periodically reviewed.		
Objective Evidence:	<p>Brabanta has Emergency procedures for identified emergencies written in the French language and explained to workers in the local language during toolbox Talks. However, several workers at critical areas of emergency could not adequately demonstrate understanding of these procedures. For example, at the fuel station as Sanga Sanga,</p> <p>Also, the company has trained and assigned operatives to administer first aid when required. In the field, First Aid kits are provided only at the Division offices and rely on emergency number to call for First Aid assistance when required. The system in its present form was found to be ineffective as workers were not having the required call credit on their phones to make emergency calls. For example, a test done at K10A. The company indicated to have plans to install Toll Free for emergency numbers.</p>		
Corrections:	<p>Brabanta received confirmation from Airtel for the free emergency number</p> <ol style="list-style-type: none"> 1. Make a first aid kit available to all field teams 2. Set up a toll-free number that will allow workers to call even without credit in their phones 		

RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

	<ol style="list-style-type: none"> 3. Make all staff aware of this number 4. Post this number in all public places and accessible to all staff to make the number accessible 5. Make sure that the first aider is easily reachable and has easy access to the first aid kit 6. Evaluate the effectiveness of the system and improve where possible if there are any discrepancies
Root Cause Analysis:	Some workers do not have mobile phone credit and therefore could not call the emergency number, Difficulty to contact the first aider in case of emergency, no first aid kit available at the workplace, only one kit per section
Corrective Actions:	<ol style="list-style-type: none"> 1. A portable first aid kit is made available to each plantation supervisor 2. An emergency toll-free number is set up for everyone to call in case of emergency 3. The number is broadcast by outlook for posting in all public places 4. An evaluation of the effectiveness of the system will be done each month at the health and safety committee meeting
Assessment Conclusion:	<p>Accident and emergency procedures are available in the mill and estates and displayed at various locations in the head office, divisional office and mill compound. Workers are trained on the procedures and evacuation and response drills are simulated to prepare the workers for the actual situations. Interview with the sampled workers in the mill and estate stores indicated that they were trained and understand the emergency procedures.</p> <p>First Aiders were available in the mill and estates. In the estate, the portable first aid boxes were placed with the supervisors of each operations. The <i>Chef d'equipe (supervisor)</i> of each operations has been identified as the First Aider responsible for handling the First Aid Boxes. While for the mill the First Aid box is placed at the respective stations with the Station Head identified as the First Aiders responsible for handling the boxes. All personals responsible for the First Aid Boxes have undergone specific trainings, conducted by the Brabanta Medical Centre. Interview with the sampled First Aiders indicated that they were able to distinguish the items in the first aid boxes and its uses.</p> <p>Interview with the <i>Chef d'equipe indicated that they were aware on the toll free number and could demonstrate how to make a call to the toll free number using their mobile.</i></p> <p>Hence the minor non-conformity is closed on 11/01/2023.</p>

Opportunity for Improvement	
OFI#	Description
OFI 1	<p>Indicator 7.4.3</p> <p>OFI Statement: A nutrient recycling strategy that includes use of EFB, and POME is in place. However, at the time of the audit, no evidence was found to support the use of POME. Additionally, there are no clearly assigned, and appropriate zones for storage of EFB and fiber. Fiber storage zones behind the mill pose a contamination risk to the neighboring Kasai River.</p> <p>Verification / Follow-up actions:</p>

	<p>Brabanta POM has demarcated areas for storage of fibre as evidenced during field visits, specifically the mill walk. During the site visit to Kanangai Estate, the EFB application was observed and confirmed to tally with the records that were shown. See current evidence under 7.4.3.</p>
<p>OFI 2</p>	<p>Indicator 7.8.2</p> <p>OFI Statement: Water courses and wetlands are protected. Actions such as clearly marking of riparian zones have been undertaken. However, Brabanta does not conduct water analysis of neighbouring rivers: Kasai, Lumbundji to determine whether their activities are impacting on the rivers.</p> <p>Verification / Follow-up actions:</p> <p>To ensure this, Brabanta conducts regular water analysis on all riparian water bodies/streams. A sample is collected upstream and downstream on each river and tested to determine possible impacts by Brabanta activities. The reports of water analysis for the month of December 2022 were seen during the audit. The report with reference: ESP/VD/DIR/MK/1851/NM/2022 of 29th December 2022, and conducted by Ecole de Sante Publique, University of Kinshasa. Both microbiological and physico-chemical analyses were conducted on the water samples. For instance:</p> <ul style="list-style-type: none"> - Sample No. 5: Kasai River (downstream) - Sample No. 7: Lumbunji River (upstream) - Sample No. 8: Lumbunji River (downstream) <p>Samples were collected on 15 December 2022 and analysis commenced on 22 December 2022.</p>
<p>OFI 3</p>	<p>Indicator 7.12.6</p> <p>OFI Statement: A monitoring programme is in place and daily reporting sheets have been prepared to capture field observations (e.g. number of trees cut, clearings sited, fires, location/site/estate/Block, number/surface area, person who committed the act, Village/Camp, Comments). Several reports for the year 2020 and 2021 were made available at the time of the audit. Sensitization campaigns are held in Camps and communities on RTE and HCV. However, the sheet does not capture, siting and/or killings of RTE as identified in HVC assessment</p> <p>Verification / Follow-up actions:</p> <p>A monitoring programme is in place and daily reporting sheets have been prepared to capture field observations (e.g., number of trees cut, clearings sited, fires, location/site/estate/block, number/surface area, RTE capture, harm, collect, trade, possession, killing, person who committed the act, Village/Camp, Comments). Sensitization campaigns are held in Camps and communities on RTE and HCV.</p>
<p>OFI 4</p>	<p>Indicator 2.1.3</p> <p>OFI Statement: Brabanta has clearly demarcated and maintained the boundaries of its concession as legally allocated on maps attached the concession and also on the ground. The company's boundaries are maintained by motorable roads and numbers of concrete pillars. However, some of the boundary pillars are either removed or defaced. For example, the follow boundaries in Sanga Sanga.</p> <ol style="list-style-type: none"> 1. PMB (defaced) S 4.399599; E20.205022 2. PBM (defaced) S 4.360330; E 20.201557 3. PMB (removed) S 4.369338; E 20.202920 <p>It is observed that, the company will benefit from replacement of removed and defaced concrete boundary pillars</p> <p>Verification / Follow-up actions:</p> <p>Field visits with the use of a GPS was carried to verify boundary pillars and concession limits. The boundary pillars have been replaced and maintained in good visible condition. Sampled the pillars as below:</p> <ol style="list-style-type: none"> 1. PBM 3: S 4.360911; E 20.196825 2. PBM 4: S 4.360330; E 20.201557

	3. PBM 5: S 4.360331; E 20.201559
OFI 5	<p>Indicators 5.2.1</p> <p>OFI Statement:</p> <p>Brabanta consults with communities where its loose fruit collectors are located to assess their needs for support including support for repair of their roads. However, the company’s stakeholder list has not identified its Lose Fruit Collectors as interested parties to assess their needs for support.</p> <p>Verification / Follow-up actions:</p> <p>The company has a documented list of its stakeholders which was made available to the audit team. The list contains information on the Name of the stakeholder, activities they perform and contact address. The list is reviewed and updated on a regular basis and as and when there are new stakeholders identified. Verified that the communities where the loose fruit collectors were located have been included in the recently updated Stakeholder List.</p>

3.3.2 Summary of the Nonconformities and Status

CAR Ref.	Category (Critical / Minor)	P&C Indicator	Issued Date	Status & Date (Closure)
2111113-202108-M1	Critical	3.6.1	03/09/2021	Closed on 23/12/2021
2111113-202108-M2	Critical	3.6.2	03/09/2021	Closed on 23/12/2021
2111113-202108-M3	Critical	5.1.2	03/09/2021	Closed on 23/12/2021
2111113-202108-M4	Critical	6.1.5	03/09/2021	Closed on 23/12/2021
2111113-202108-M5	Critical	6.2.4	03/09/2021	Closed on 23/12/2021
2111113-202108-M6	Critical	6.3.1	03/09/2021	Closed on 23/12/2021
2111113-202108-M7	Critical	6.7.1	03/09/2021	Closed on 23/12/2021
2111113-202108-M8	Critical	6.7.3	03/09/2021	Closed on 23/12/2021
2111113-202108-M9	Critical	7.2.7	03/09/2021	Closed on 23/12/2021
2111113-202108-M10	Critical	7.10.1	03/09/2021	Closed on 23/12/2021
2111113-202108-M11	Critical	3.8.5	03/09/2021	Closed on 23/12/2021
2111113-202108-M12	Critical	3.8.6	03/09/2021	Closed on 23/12/2021
2111113-202108-M13	Critical	3.8.7	03/09/2021	Closed on 23/12/2021
2111113-202108-M14	Critical	3.8.12	03/09/2021	Closed on 23/12/2021
2111113-202108-M15	Critical	3.8.9	03/09/2021	Closed on 23/12/2021
2111113-202108-N1	Minor	3.7.3	03/09/2021	Closed on 11/01/2023
2111113-202108-N2	Minor	6.2.6	03/09/2021	Closed on 11/01/2023
2111113-202108-N3	Minor	6.3.2	03/09/2021	Closed on 11/01/2023
2111113-202108-N4	Minor	6.4.1	03/09/2021	Closed on 11/01/2023
2111113-202108-N5	Minor	6.5.3	03/09/2021	Closed on 11/01/2023
2111113-202108-N6	Minor	7.8.3	03/09/2021	Closed on 11/01/2023

2111113-202108-N7	Minor	7.9.1	03/09/2021	Closed on 11/01/2023
2111113-202108-N8	Minor	2.2.1	03/09/2021	Closed on 11/01/2023
2111113-202108-N9	Minor	2.2.2	03/09/2021	Closed on 11/01/2023
2111113-202108-N10	Minor	2.2.3	03/09/2021	Closed on 11/01/2023
2111113-202108-N11	Minor	3.3.2	03/09/2021	Closed on 11/01/2023
2111113-202108-N12	Minor	5.1.1	03/09/2021	Closed on 11/01/2023
2111113-202108-N13	Minor	5.1.5	03/09/2021	Escalated to Critical
2111113-202108-N14	Minor	6.7.2	03/09/2021	Closed on 11/01/2023
2299249-202301-M1	Critical	3.4.2	11/09/2023	Closed on 30/03/2023
2299249-202301-M2	Critical	5.1.5	11/09/2023	Closed on 30/03/2023

3.4 Stakeholders and previous land owner / user consultation

Stakeholder consultation involved internal and external stakeholders. External stakeholders were contacted by telephone to arrange meetings at a location convenient to them to discuss Brabanta SA – Brabanta POM Certification Unit’s environmental and social performance, legal and any known dispute issues.

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

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

Stakeholders contacted		
Type of Stakeholder (e.g. Internal, Union, Contractor, Governmental Department, NGO, External, Communities)	Stakeholder name / organization	Means of communication (e.g. face to face interview, email, phone interview, comment from public notice)
External Communities	Malanyo-Bwanga	Face to face interview
External Communities	Mapangu-Village	Face to face interview
External Communities	Ngoyi	Face to face interview
External Communities	Kadima	Face to face interview
External Communities	Mapangu-Missions	Face to face interview
External Communities	Kayaya-Rivier	Face to face interview
Internal Stakeholders	Workers Union	Face to face interview
Internal Stakeholders	Gender Committee	Face to face interview

Stakeholders comment	
1	<p>Feedbacks: The stakeholder engagement brought together representatives from the Malanyo-Bwanga, Mapangu-Village, Ngoyi, Kadima, Mapangu-Missions and Kayaya-Riviera communities. Although the communities during the audit engagements brought forth some concerns, generally, the communities indicated they have an improved relationship with Brabanta SA. They indicated to have an agreement with the company which has been implemented. Some of the agreement includes the annual distribution of palm oil to all communities who have an agreement with the company. Other benefits to the communities from the company include school construction and rehabilitation, provision of portable water, roads and others.</p> <p>Some concerns raised by the communities during the audit include the agreement with the communities was to supply five tons of palm oil per year but the company have only supplied one ton. Communities are not given priority when there is a vacancy in the company especially office works. One of the community representatives raised the issue of a woman who works in the Kanaiga Plantation who had miscarriage at work and was not attended to by the company. Further verification indicated that the representatives acknowledged that they understand on the company's complain and grievance mechanism as they have been informed by the company. However, the audit found it important to bring it to the attention of management</p> <p>Audit Team verification and response: On the issue of the distribution of palm oil, management made available copies of the Memo with the communities. The MoU signed on the 12/02/2015 indicates one barrel of palm oil every year per village who conceded their forest to the company. Also, on the case of miscarriage, management indicated that their attention has not been drawn to it and will take it up and investigate the issue.</p>
2	<p>Feedbacks: Interview with the workers' representatives indicates they have a better relationship with management after the company's initial certification. There has been improved engagement and collaborations with management on workers' conditions. They are now involved in discussions on workers' salaries and all copies of the minutes of meetings are shared with them. Currently, the workers' representatives have issued a letter to management to trigger negotiations on the current collective bargaining agreement.</p> <p>Audit Team verification and response: Interview with management confirmed having received a letter from the workers' representatives and have responded to it as part of the processes for the negotiations.</p>
3	<p>Feedbacks: Brabanta SA has a gender committee in place with a clear terms of reference. The committee is made up of seven members with an annual program from which they have activities for implementation. During interview with the committee, they indicated that they have no issues of concern.</p> <p>Audit Team verification and response: During interview with sampled female workers in the estate, they all confirmed knowledge of the gender committee and trainings organised by the committee.</p>

List of land owner / user contacted					
Name	Years of ownership / used	Land area (ha)	Agreement (Yes / No)	Agreement base on FPIC (Yes/No)	Compliance on the agreement terms and conditions

RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

Brabanta SA	2015	1,508.59	Yes	NA	Complied
-------------	------	----------	-----	----	----------


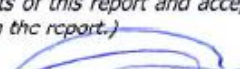
Previous land owner / user comment	
Government of Democratic Republic of the Congo	<p>Feedbacks: The rights to use was acquired after successful negotiations between Brabanta and the Government of Congo DR. The land was leased in 2015 for a period of 25 years and its renewable. All payment required have been made. Although, this was a state land, the company as part of its effort to maintain and enhance good relations makes annual payments to the leaders of the following communities: Ngoyi, Malango Nbuaga, Kayaya, Tshiya, Mubende, Mapangu Village, Kalembe Mpata, Kalembe Dito and Kawawa.</p> <p>Audit Team verification and response: Brabanta SA is an existing oil palm plantation that was acquired after negotiations with the state government. The company has evidence of land title documents and evidence of payments in line with the terms of rights to land use. Copies of the land title documents and payment receipts were made available to the audit team for review.</p>

3.5 Impartiality and conflict of interest

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

Formal Signing-off of Assessment Conclusion and Recommendation

The audit objectives have been achieved and the certificate scope is appropriate. Based on the results of this audit, it is concluded that Brabanta SA – Brabanta POM and Supply Base has complied with the RSPO P&C 2018 for Production of Sustainable Palm Oil and audit criteria identified within the audit report. It is deemed that the management system has achieved its intended outcomes. Therefore, it is recommended that Brabanta SA – Brabanta POM and Supply Base is remain certified.

Report prepared by	Acceptance of Assessment Conclusion
Name: VIJAY KANNA PAKIRISAMY	Name: DESREPT
Company Name: BSI SERVICES (MALAYSIA) SDN BHD	Company Name: BRABANTA.
Title: CLIENT MANAGER	Title: 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> 

Appendix A: Summary of Findings

Criterion / Indicator	Assessment Findings	Compliance	
<p>Principle 1: Behave ethically and transparently</p>			
<p>Drive ethical business behaviour, build trust and transparency with stakeholders to ensure strong and healthy relationships.</p>			
<p>Criteria 1.1: The unit of certification provides adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.</p>			
<p>1.1.1</p>	<p>(C) Management documents that are specified in the RSPO P&C are made publicly available. - Critical (Major) compliance -</p>	<p>Brabanta has a list of documents and have made the documents publicly available through various means. This include display on the company’s notice boards in and around the company premise, on their website (Commitments Socfin) and also sharing with the different community chief’s. Some of the documents seen on the notice boards are,</p> <ol style="list-style-type: none"> 1. Child Labour policy 2. Freedom of Association policy 3. Sexual harassment policy 4. Environmental policy 5. Communication and Consultation procedures 6. Grievance Mechanism <p>During stakeholder interviews with the communities including Malanyo Bwanga, Ngoyi, Kadima, Mapangu and Kayaya Riviere all confirmed that copies of the policies has been shared with the community chiefs.</p> <p>Also, a review of the company’s communication and consultations procedure indicates that some of the documents are also made available on request. Some of such documents are,</p> <ol style="list-style-type: none"> 1. Occupational health and safety plans. 2. Environmental and social impact studies and plans. 3. Documentation on High Conservation Value (HCV) and High Carbon 	<p>Complied</p>

		<p>Stock areas (HSC).</p> <p>4. Continuous improvement plan.</p> <p>5. The pollution prevention and reduction plan.</p>	
1.1.2	<p>Information is provided in appropriate languages and accessible to relevant stakeholders.</p> <p>- Minor compliance -</p>	<p>Most of the company's documents reviewed are written in French which is the official written and spoken language in Congo DR. However, some of the documents made available to the audit team for review were also written in Kikongo language commonly spoken by the communities and workers. Interview with 3 workers in the Kanaiga estate (Block K10), 9 female workers in Kadima estate (Block D9) and 44 workers in Kanangai Estate all confirmed the policies and other information are explained to them in both the French and Kikongo local language at their early morning muster. Interview with the communities during the audit interviews all confirmed the content of the documents are explained to their understanding by the company's community liaison officer.</p>	Complied
1.1.3	<p>(C) Records of requests for information and responses are maintained.</p> <p>- Critical (Major) compliance -</p>	<p>Brabanta keeps records of all request for information and their response which they receive from all their stakeholders including workers and the communities. The request which comes in either verbal or written form are recorded in a notebook captioned Reception Indicateur/Courrier. There were no requests for information at the time of this audit.</p>	Complied
1.1.4	<p>(C) Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by a nominated management official.</p> <p>- Critical (Major) compliance -</p>	<p>The company has a documented external communication procedure dated 31/01/2020 and approved by the Director General. The objective of the procedure is to identify the company's external stakeholders and to determine the means by which they can get in touch within the framework of communication and consultation with them. The procedure is applicable to all Brabanta external stakeholders which includes communities, NGOs, government, local and traditional authorities and loose fruit collectors. The document identifies the Director of Public Relations and Communication (DRPC) as the main actor in terms of communication and consultation with external stakeholder at the local level. He meets the communities and give out</p>	Complied

		<p>information from the company.</p> <p>The company also has a documented Consultation and Communications procedures for internal stakeholders dated 10/09/2019 and approved by the Director General. The aim of the internal procedure to ensure accessible and transparent communication between Brabanta and all of its internal stakeholders. The procedure is applicable to all of Brabanta S.A operations including the Plantations, Hospital, Security and Administration in Kinshasa. Interview with the workers union confirmed the procedure has been shared and explained to them.</p>	
1.1.5	<p>There is a current list of contact and details of stakeholders and their nominated representatives.</p> <p>- Minor compliance -</p>	<p>The company has a documented list of its stakeholders which was made available to the audit team. The list contains information on the Name of the stakeholder, activities they perform and contact address. Some of the stakeholders such the communities, workers' and gender committee were selected during this audit period for consultations.</p> <p>However, the stakeholder list can be improved to include the date and categorization of the different stakeholder. Hence, an OFI was raised.</p>	OFI
<p>Criteria 1.2: The unit of certification commits to ethical conduct in all business operations and transactions.</p>			
1.2.1	<p>A policy for ethical conduct is in place and implemented in all business operations and transactions, including recruitment and contracts.</p> <p>- Minor compliance -</p>	<p>The company has a policy for ethical conduct in place titled Brabanta Employee code of ethics and dated April 2019. The policy is applicable to all consultants and suppliers doing business with the company or on behalf of the company. This policy is publicly displayed on all notices as seen during a field visit to the main administration block and the three estates under the scope of this audit. Interview with workers indicates the policy has been communicated to their understanding. The policy has also been shared with the communities and explained to their understanding. This was confirmed by the communities who were engaged during the audit period. Review of sampled agreement shows the policy together with all other policies of the company is captured in the contract agreements the company signs with their contractors and is binding on them. Periodic checks are conducted by the company to</p>	Complied

		monitor the compliance to the ethical policy such as payment of workers social security.	
1.2.2	A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice. - Minor compliance -	<p>Brabanta communicates the policy by displaying on the notices and on the company websites (Commitments Socfin). Copies of the policy is shared with the workers and they receive daily sensitization during their morning meetings. Interview with the workers union confirm the policy has been shared with them also they are sensitized on it during their early morning muster. Compliance and the implementation of the policy and overall ethical business practise is done via a few methods such as.</p> <ol style="list-style-type: none"> 1. Annual Internal Audits conducted by the Brabanta Sustainability Department where compliance to the policy and general business ethics are audited. Verified the recent internal audit conducted on 16/05/2022 – 23/05/2022. 2. Signed Contract Agreements between Brabanta and contractors and suppliers which include the statement of commitment of the contract holder to ensure compliance towards the policy and overall ethical business practise. Sampled contracts include, <ol style="list-style-type: none"> a. Societe de Transport et de Logistique du Congo (STLC Sarl) for the transportation of FFB and Fertilizer for the company. b. SK Protection for the provision of Security for the company. 	Complied
<p>Principle 2: Operate legally and respect rights Implement legal requirements as the basic principles of operation in any jurisdiction.</p>			
<p>Criteria 2.1: There is compliance with all applicable local, national and ratified international laws and regulations.</p>			
2.1.1	(C) The unit of certification complies with applicable legal requirements. - Critical (Major) compliance -	Brabanta complies with applicable legal requirements. The unit of certification keeps an updated list of all applicable national laws as well as international laws duly signed and ratified by the country, and which are applicable to Brabanta’s operations. The list captures laws according	Complied

RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

		<p>to different sectors such as fiscal, labour, social, land tenure, environmental, forestry, agriculture, transport, customary and financial and freedom of association laws.</p> <p>Evidence of compliance with application legal requirements was equally verified. For instance, in respect of - Decret n° 18/027 of 14/07/2018 pertaining to the creation and operation of the National Social Insurance Fund (CNSS) as well as Ministerial Order n° 049/CAB/MIN/ETPS/MB/2012 of 10 December 2012 regarding registration of employees (J.O.RDC spécial du 20 Décembre 2012) and social security payments, Brabanta workers are all registered with the National Social Security Fund (Caisse Nationale de Sécurité Sociale - CNSS) as evidenced by worker payslips.</p> <p>Additionally, compliance of freedom of association laws as embodied in law n°004/2001 of 20/07/2001 pertaining to the general disposition applicable to non-profit associations and public interest establishments, was evidenced by the presence of workers' unions and their duly elected representatives.</p>	
2.1.2	<p>A documented system for ensuring legal compliance is in place. This system has a means to track changes to the law and also includes listing and evidence of legal due diligence of all contracted third parties, recruitment agencies, service providers and labour contractors.</p> <p>- Minor compliance -</p>	<p>A documented system for ensuring legal compliance is in place. In this regard, Brabanta has duly subscribed to the National Official Journal to help them keep track of all changes in laws.</p> <p>Additionally, Brabanta conducts an annual legal audit to assess and identify all gaps in legal requirements and compliance. The legal audit (Veulle Reglementaire) for 2022 was seen during the audit and contains information on: domain of application of the law, the law proper, specific requirement as per the law, date of promulgation, date of entry into force, conformity by Brabanta, proof of conformity.</p>	Complied
2.1.3	<p>Legal or authorised boundaries are clearly demarcated and visibly maintained, and there is no planting beyond these legal or authorised boundaries.</p>	<p>The legal boundaries of the Brabanta concession are clearly demarcated and visibly maintained. To ensure this, Brabanta has established a system of roads to serve as clear boundaries around the entire</p>	Complied

RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

	- Minor compliance -	<p>concession area. Additionally, boundary pillars have been placed at different points to denote the limits of the Brabanta concession.</p> <p>Field visits with the use of a GPS was carried to verify boundary pillars and concession limits. These field visits did not reveal any planting beyond the limits of the concession. Additionally, GPS points taken tally with those on Brabanta concession maps as evidenced by:</p> <ol style="list-style-type: none"> 1. PBM 3: S 4.360911; E 20.196825 2. PBM 5: S 4.360331; E 20.201559 	
Criteria 2.2: All contractors providing operational services and supplying labour, and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements.			
2.2.1	<p>A list of contracted parties is maintained.</p> <p>- Minor compliance -</p>	<p>The company maintains a list of all their third party contractors in the stakeholder list. Contract of agreement for sampled third parties were reviewed and all were found to be valid. They include</p> <ol style="list-style-type: none"> 1. Societe de Transport et de Logistique du Congo (STLC Sarl) for the transportation of FFB and Fertilizer in for the company 2. SK Protection for the provision of Security for the company 	Complied
2.2.2	<p>All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal requirements, and this can be demonstrated by the third party.</p> <p>- Minor compliance -</p>	<p>Reviewed sampled contracts from the list of contracted parties. The contract is signed between Brabanta SA and</p> <ol style="list-style-type: none"> 1. Societe de Transport et de Logistique du Congo (STLC Sarl) for the transportation of FFB and Fertilizer. 2. SK Protection for the provision of Security . <p>All contracts review has a clause on meeting all applicable legal requirements.</p>	Complied
2.2.3	<p>All contracts, including those for FFB supply, contain clauses disallowing child, forced and trafficked labour. Where young workers are employed, the contracts include a clause for their protection.</p> <p>- Minor compliance -</p>	<p>Reviewed sampled contracts from the list of contracted parties. The contract is signed between Brabanta SA and</p> <ol style="list-style-type: none"> 1. Societe de Transport et de Logistique du Congo (STLC Sarl) for the transportation of FFB and Fertilizer. 2. SK Protection for the provision of Security. 	Complied

		All contracts review has a clause disallowing child, forced and trafficked labour.	
Criteria 2.3: All FFB supplies from outside the unit of certification are from legal sources.			
2.3.1	<p>(C) For all directly sourced FFB, the mill requires:</p> <ul style="list-style-type: none"> Information on geo-location of FFB origins Proof of the ownership status or the right/claim to the land by the grower/smallholder Where applicable, valid planting/operating/trading license, or is part of a cooperative which allows the buying and selling of FFB <p>- Critical (Major) compliance -</p>	The mill sources its FFB from its own supply base estates that are certified within the certification unit, namely Sanga Sanga Estate, Kadima Estate and Kanangai Estate. The mill also receives non certified FFB from its own non certified estates and Mr. Alex Kumambange, who serves as a Collection centre for villagers to sell Loose Fruits . As for the certified suppliers, the mill has information of geo location of FFB origins, proof of ownership and valid planting documents.	Complied
2.3.2	<p>For all indirectly sourced FFB, the unit of certification obtains from the collection centres, agents or other intermediaries, the evidence as listed in Indicator 2.3.1.</p> <p>- Minor compliance -</p>	For indirectly sourced FFB, the mill receives Loose Fruits collected by the villagers via a centralised collector, Mr. Alex Kumambange. Previously, the loose fruits were sent directly to the mill by the villagers. Hence, the mill still maintains all information of the villagers and its updated from time to time which includes information such as geo-location of FFB Origins and proof of land usage rights.	Complied
PROCEDURAL NOTE: For Implementation Procedure for 2.3.2 refer to Annex 4.			
Principle 3: Optimise productivity, efficiency, positive impact and resilience Implement plans, procedures and systems for continuous improvement.			
Criteria 3.1: There is an implemented management plan for the unit of certification that aims to achieve long-term economic and financial viability.			
3.1.1	<p>(C) A business or management plan (minimum three years) is documented that includes, where applicable, a jointly developed business case for Scheme Smallholders.</p> <p>- Critical (Major) compliance -</p>	A business plan of a period of 10 years has been developed for the entire Socfin Group. At the level of Brabanta, this business plan has been broken down into a 5 years plan titled: Plan d’Affaires Brabanta , dated January 2023. The major components of the plan include:	Complied

RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

		<p>production/yield, agronomy, industrial processing and investments (costs and cost projections), sales of CPO and financial indicators.</p> <p>No associate smallholders or other structured smallholder scheme applies to the unit of certification.</p> <p>The Brabanta Business Plan is reviewed based on annual budgets and production projections. The performance in terms of expenditure and production is monitored on a monthly progress report which is verified by the Director General. The management has allocated expenditures such as capital expenditures to bring in machineries to increase productivity in the operations. Expenditures have also been allocated for improvements of workers housing area. The monthly progress report were verified to show gradual expenditure being channeled in accordance to the budget.</p>	
3.1.2	<p>An annual replanting programme projected for a minimum of five years with yearly review, is available.</p> <p>- Minor compliance -</p>	<p>The Brabanta plantation is a replanting of an old and abandoned plantation. Replanting of the current planted area took place between 2008-2014.</p> <p>Interviews with management revealed that there are no plans to extend the current planted area as of now. There are also no plans of replanting for the next 20 years.</p>	Complied
3.1.3	<p>The unit of certification holds management reviews at planned intervals appropriate to the scale and nature of the activities undertaken.</p> <p>- Minor compliance -</p>	<p>The unit of certification holds annual management review meetings to review implementation of planned activities. Interviews with the General manager and the Finance director revealed that these annual sessions are accompanied by a budgetary attribution to the respective activities in the business plan. Sighted the Management review conducted on 14/09/2022 with records of report available for verification.</p> <p>Additionally, every Tuesday management meetings are held to ensure continuous monitoring of the management plans. Verified the records of meeting dated 03/01/2023.</p>	Complied

RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

Criteria 3.2: The unit of certification regularly monitors and reviews their economic, social and environmental performance and develops and implements action plans that allow demonstrable continuous improvement in key operations.		
3.2.1	<p>(C) The action plan for continuous improvement is implemented, based on consideration of the main social and environmental impacts and opportunities of the unit of certification.</p> <p>- Critical (Major) compliance -</p>	<p>Continuous improvement plans for all operating units for review period 2022 and 2023 were documented under Environment and Social Improvement Plans Brabanta. Social and environmental were among pertinent elements covered in the action plan. The plan covers core concerns such as workers living condition, firefighting, chemical reductions, GHG, water and waste management among others. On top of the established plan, allocation of capital expenditure for process improvement, social and environmental components were also verified.</p>
3.2.2	<p>As part of the monitoring and continuous improvement process, annual reports are submitted to the RSPO Secretariat using the RSPO metrics template.</p> <p>- Minor compliance -</p>	<p>RSPO metric template version 2.1 is used for the reporting of Brabanta Certification Unit's metrics (economic, social and environment). Data reporting period is April 2022 to December 2022 for (social and environment metrics) and economic metrics from April 2021 – Nov 2022 (counting back from audit month). Based on verification with input data, no discrepancies of data reported for the said period for all metrics.</p>
Criteria 3.3: Operating procedures are appropriately documented, consistently implemented and monitored.		
3.3.1	<p>(C) Standard Operating Procedures (SOPs) for the unit of certification are in place.</p> <p>- Critical (Major) compliance -</p>	<p>Brabanta has Standard Operating Procedures to cover its operations in the plantations and the Palm Oil Mill. These SOPs were made available for review during the audit. These SOPs were found to be appropriate and adequately covered the relevant processes and activities of the plantation and the mill. They are all dated and approved by management. These SOPs are written in the French language which is the official language. Current versions were found to be available at relevant sites visited during the audit.</p> <p>a. Procedure for Pricing of Villagers Loos Fruits; Document Date: 20/10/2021.</p>

RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

		<ul style="list-style-type: none"> b. Management System – Supply Chain Management and Traceability Procedure according to the Revised RSPO Principles and Criteria 2018 Including the RSPO Supply Chain Certification Standards. c. Procedure de Gestion des Grieffs Internes et Externes (Internal and External Grievance Management Procedure) last updated on the 31/01/2020. d. Procedure for the control and fight against pests: Rhyncophorus (Procedure de Contrôle et Lutte Contre les Ravageurs: Rynchophorus) of 23/08/2019, Document Ref.: CLCR, Index 01. e. Procedure for sanitization of Ganoderma (Procedure de la Sanitization du Ganoderma) of 23/08/2019; document Ref. SAGA, Index 01. <p>Interview with workers and review of records confirmed that these procedures are generally understood by workers and are implemented.</p>	
3.3.2	<p>A mechanism to check consistent implementation of procedures is in place.</p> <p>- Minor compliance -</p>	<p>Brabanta has mechanism in place to ensure the consistent implementation of its SOPs. This mechanism includes a diffusion of procedures, sensitization, training, monitoring, internal audits and evaluation of implementation among other approaches. In terms of diffusion, procedures are sent to the relevant workers to read and sign as having read. Latest internal audit was conducted from 16/05/2022 – 23/05/2022.</p> <p>The company also used the weekly Tool Box Talks specific to each department and daily briefings done by supervisors at each work site. For monitoring and evaluation of implementation of the procedures, an evaluation is done using the evaluation sheet for each procedures every 6 month and records are kept, sample of which were reviewed. Whenever there is non-conformance found during the monitoring, the management are directed to conduct corrective actions which are followed closely by the Sustainability Department. Related personals are also retrained on the related procedures to ensure the procedures are</p>	Complied

RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

		adequately implemented. Company has general procedures for handling non-conformities which applies to the results of monitoring and evaluation (procédures de traitement de non-conformités réelles ou potentielle of 18/06/2015.	
3.3.3	Records of monitoring and any actions taken are maintained and available. - Minor compliance -	Brabanta maintains records of monitoring and actions taken for the implementation of its SOPs. These were made available and reviewed during the audit. Among the records verified were, a. Sensitisation Records. b. Internal Audit Report dated 16/05/2022 – 23/05/2022. c. Daily PPE Checklist d. Management Review dated 14/09/2022.	Complied
Criteria 3.4: A comprehensive Social and Environmental Impact Assessment (SEIA) is undertaken prior to new plantings or operations, and a social and environmental management and monitoring plan is implemented and regularly updated in ongoing operations.			
3.4.1	(C) In new plantings or operations including mills, an independent SEIA, undertaken through a participatory methodology involving the affected stakeholders and including the impacts of any smallholder/outgrower scheme, is documented. - Critical (Major) compliance -	Brabanta has commissioned an independent ESIA that was conducted by "OKAPI Environment Conseil sprl". The report titled "Étude d'impact environnemental et social des équipements additionnels (Usine, quai, extension plantation Forêt de Lumbunji et Malembe) of November 2011" has been approved by the "Ministère de l'Environnement, Conservation de la Nature et Tourisme (MECNT)". This ESIA covered, the Factory, wharf, and plantation extension in Lumbunji and Malembe. This study integrated an earlier "Environmental And Social Impact Study (ESIA) of the BRABANTA-MAPANGU Project (PBM) carried out by Pierre Bois d'ENGHIEN in July 2010 which focused mainly on the existing plantation. Brabanta is also carrying out new development on building and construction of new lagoon for the treatment of its POME. It has an independent environmental and social assessment for these developments. For example, "Project D'aménagement D'un Bassin De	Complied

RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

		<p>Retention A Mapangu/Brabanta, Etude D’impact Environnemental Et Social”. By these, the company has SEIA covering the scope of its new developments.</p> <p>The ESIA studies included consultations with the affected stakeholders at different levels and stages of the study in a participatory manner as evidenced in the OKAPI ESIA (Consultation du Public” 124-125).</p>	
3.4.2	<p>For the unit of certification, a SEIA is available and social and environmental management and monitoring plans have been developed with participation of affected stakeholders.</p> <p>- Minor compliance -</p>	<p>The OKAPI study cited in 3.4.1 above included an Environmental and Social Management Plan (ESMP) which detailed a practical and operational program for environmental and social monitoring. The ESMP was developed as part of the overall SEIA study and included inputs of stakeholder at all stages of the study in a participatory manner as previously mentioned. Interviews with the relevant stakeholders during the audit confirmed their participation in this process. Brabanta also has an Environmental and Social Management plan for its existing plantation “Etude D’impact et Plan De Gestion Environnemental Et Social Approche Sociologique” by Alain Kanza Mopela Pendje, Sociologue et Anthropologue, 15 June to 15 July 2010.</p> <p>Brabanta has integrated these plans into its environmental management plan “ plan de gestion environnementale” of 15/01/2021 and the “Plan d’action Gestion Sociale of 05/07/2021.</p>	Complied
3.4.3	<p>(C) The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way.</p>	<p>BRABANTA commissioned an independent social and environmental impact assessment. According to national legal requirements, this assessment must be reviewed and updated every five years. In fulfilment of this legal requirement, Brabanta reviewed and updated its SEIA in June 2022.</p> <p>However, the social management action and monitoring plan has neither been reviewed nor updated in a participatory manner. Hence, a critical non-conformity was raised.</p>	Non-compliance

Criteria 3.5: A system for managing human resources is in place.

RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

3.5.1	<p>Employment procedures for recruitment, selection, hiring, promotion, retirement and termination are documented and made available to the workers and their representatives.</p> <p>- Minor compliance -</p>	<p>The company has a documented procedure for recruitment, selection, hiring, promotion, retirement and termination and was made available to the audit team for review. The document is dated 12/07/2019 and approved by the Human Resource Manager and the Director General. The company employs two categories of workers in their operation. They are the temporal and permanent staff. The procedure for the recruitment of permanent and temporal staff are the same. The difference is determined by the job requirement. A visit to sampled notice boards shows the procedure has been made publicly available by displaying on the notice boards in the company. Copies are also made available on request as indicated by the Human Resource manager during interview.</p>	Complied
3.5.2	<p>Employment procedures are implemented and records are maintained.</p> <p>- Minor compliance -</p>	<p>The company maintain records of implementation of the procedures and were made available to the audit team for review. No recruitment has been made by the company for the year under review.</p>	Complied
Criteria 3.6: An Occupational health and safety (H&S) plan is documented, effectively communicated and implemented.			
3.6.1	<p>C) All operations are risk assessed to identify H&S issues. Mitigation plans and procedures are documented and implemented.</p> <p>- Critical (Major) compliance -</p>	<p>Brabanta Certification Unit has established a Risk Register documented in <i>Brabanta - Departement Agronomique : Analyse De Risques</i>, that has identified all risks associated to workstations in the estate and mill. The identified risks has been established its control measures. The mill and estate management conduct monthly site inspections to ensure the risk mitigation methods are adhered to accordingly. Training programs are in place to train all personals regularly on the mitigation plans as well.</p> <p>During the field visit document reviews, the implementation of the risk controls were verified. Evidences such as implementation of safe operating procedures, usage of PPEs and sensitisation programs were available and verified.</p>	Complied
3.6.2	<p>(C) The effectiveness of the H&S plan to address health and safety risks to people is monitored.</p>	<p>The mill and estate ensure that the health and safety in their operations are continuously monitored.</p>	Complied

RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

	<p>- Critical (Major) compliance -</p>	<ol style="list-style-type: none"> 1. The mill and estate conduct weekly monitoring on the stations and activities to monitor the effectiveness of the implementation of safety in their operating units. They have established a weekly checklist which consist of monitoring prior to work being started as well as during the work is being carried out. 2. Monthly Site Inspections are conducted by the HSE Sustainability team at the mill and estate to ensure all safety plans are in place and adhered to by the workers and personals. 3. The Brabanta Health Centre conduct regular check-up for their workers especially chemical handlers to monitor the health condition and occupational consequences that may occur to their workers. Records of monitoring were available and verified at the Brabanta Health Centre. 	
<p>Criteria 3.7: All staff, workers, Scheme Smallholders, outgrowers, and contract workers are appropriately trained.</p>			
<p>3.7.1</p>	<p>(C) A documented programme that provides training is in place, which is accessible to all staff, workers, Scheme Smallholders and outgrowers, taking into account gender-specific needs, and which covers applicable aspects of the RSPO P&C, in a form they understand, and which includes assessments of training.</p> <p>- Critical (Major) compliance -</p>	<p>Brabanta Certification Unit has established a training program for 2023 entitled "<i>Programme de sensibilisation et de formation - Brabanta – 2023.</i>"The program consist of training needs that has been identified for each worker at each operations as well as gender specific training, trainings for smallholders and stakeholders, etc. The estate and mill have begun to implement the trainings that have planned for the year. The training plan for 2022 were also reviewed where all planned trainings have been conducted accordingly.</p>	<p>Complied</p>

RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

3.7.2	<p>Records of training are maintained, where appropriate on an individual basis.</p> <p>- Minor compliance -</p>	<p>Brabanta Certification Unit have maintained all records of training and sensibilisation that has been conducted in accordance to the training programs. The records were made available for verification. Sampled the training records for the trainings stated below:</p> <table border="1" data-bbox="1131 507 1968 786"> <thead> <tr> <th>Training</th> <th>Date</th> </tr> </thead> <tbody> <tr> <td>Chemical Applicators Training – Sanga Sanga Estate</td> <td>10/12/2022</td> </tr> <tr> <td>Chemical Store Management Training</td> <td>10/12/2022</td> </tr> <tr> <td>Sexual Harassment Training</td> <td>26/11/2022</td> </tr> <tr> <td>New Mothers Needs Awareness Training</td> <td>08/12/2022</td> </tr> </tbody> </table>	Training	Date	Chemical Applicators Training – Sanga Sanga Estate	10/12/2022	Chemical Store Management Training	10/12/2022	Sexual Harassment Training	26/11/2022	New Mothers Needs Awareness Training	08/12/2022	Complied
Training	Date												
Chemical Applicators Training – Sanga Sanga Estate	10/12/2022												
Chemical Store Management Training	10/12/2022												
Sexual Harassment Training	26/11/2022												
New Mothers Needs Awareness Training	08/12/2022												
3.7.3	<p>Appropriate training is provided for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS). Training is specific and relevant to the task(s) performed.</p> <p>- Minor compliance -</p>	<p>The company has identified personnel critical to the implementation of the Supply Chain Certification Standard (SCCS). They are the mill manager, weighbridge clerk, RSPO Coordinator, Financial director, Assistant mill manager.</p> <p>The RSPO SCCS Training was conducted on 04/12/2021 and 26/02/2022, attendant by all related personals. The training records were available for verification.</p>	Complied										
<p>Criteria 3.8: Supply chain requirements for mills.</p>													
<p>Procedure note: all requirements are classified as Critical Indicators. However it will not contribute to suspension if there is more than 5 non-compliance within a principle)</p>													
3.8.1	<p>Identity Preserved Module</p> <p>A mill is deemed to be Identity Preserved (IP) if the FFB processed by the mill are sourced from plantations/estates that are certified against the RSPO Principles and Criteria (RSPO P&C), or against the Group Certification scheme.</p> <p>Certification for CPO mills is necessary to verify the volumes and sources of certified FFB entering the mill, the implementation of any processing</p>	<p>Brabanta POM uses the Mass Balance Module as it's FFB are sourced from its own supply base estate which is certified, Supply Base that have not been certified and smallholders that are uncertified against the RSPO P&C 2018 Standard. Hence this indicator is not applicable.</p>	Not Applicable										

RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

	controls (for example, if physical separation is used), and volume sales of RSPO certified products. If a mill process certified and uncertified FFB without physically separating them, then only Mass Balance Module is applicable.												
3.8.2	<p>Mass Balance Module</p> <p>A mill is deemed to be Mass Balance (MB) if the mill process FFB from both RSPO certified and uncertified plantations/estates. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own and 3rd party certified supply base. In that scenario, the mill can claim only the volume of oil palm products produced from processing of the certified FFB as MB.</p>	Brabanta POM receives RSPO certified FFB and uncertified FFB. Therefore, the mill qualifies for the Mass Balance Supply Chain System and module. During the RSPO assessment, the audit team verified the volumes and sources of certified FFB entering the mill, the implementation of processing controls and volume sales of RSPO certified products. Based on the mass balance records, only volume of certified products has been declared for incoming and outgoing RSPO Mass Balance products.	Complied										
3.8.3	The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill shall be recorded by the certification body (CB) in the public summary of the P&C certification report. This figure represents the total volume of certified oil palm product (CPO and PK) that the certified mill is allowed to deliver in a year. The actual tonnage produced shall then be recorded in each subsequent annual surveillance report.	The estimated tonnage of CPO products that could potentially be produced by the certified mill is recorded in section 10 of this public summary report.	Complied										
3.8.4	The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO IT platform.	<p>The registration of PalmTrace is carried out by the Finance Department, Socfin SA. All transaction are registered in the PalmTrace. Details of Registration were captured as below:</p> <table border="1" style="width: 100%;"> <thead> <tr> <th>Description</th> <th>Details</th> </tr> </thead> <tbody> <tr> <td>Member Name</td> <td>Brabanta S.A</td> </tr> <tr> <td>Commodity</td> <td>Palm Oil</td> </tr> <tr> <td>Type of Business</td> <td>Oil Mill</td> </tr> <tr> <td>Palm Trace Member ID</td> <td>RSPO_PO1000011313</td> </tr> </tbody> </table>	Description	Details	Member Name	Brabanta S.A	Commodity	Palm Oil	Type of Business	Oil Mill	Palm Trace Member ID	RSPO_PO1000011313	Complied
Description	Details												
Member Name	Brabanta S.A												
Commodity	Palm Oil												
Type of Business	Oil Mill												
Palm Trace Member ID	RSPO_PO1000011313												

RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

		Supply Chain Model	Mass Balance	
		License Status	Active	
3.8.5	<p>Documented procedures</p> <p>The mill shall have written procedures and/or work instructions or equivalent to ensure the implementation of all elements of the applicable supply chain model specified. This shall include at minimum the following:</p> <ul style="list-style-type: none"> a. Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements. b. Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records). c. Identification of the role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the mill’s procedures for the implementation of this standard. d. The mill shall have documented procedures for receiving and processing certified and non-certified FFBS including ensuring no contamination in the IP mill. 	<p>Documented Procedures.</p> <ol style="list-style-type: none"> 1. Brabanta POM have established a Supply Chain Procedure entitled “Procedure De Gestion De La Chaîne D’ Approvisionnement Et De La Tracabilite” dated 07/07/2021. 2. Records demonstrating compliance with the supply chain model requirements were available. Among the records verified were. <ul style="list-style-type: none"> a. Supply Chain Management System Training conducted on 04/12/2021 and 26/02/2022. 3. Identification of the roles of and responsibilities for the Supply Chain and Traceability at Brabanta POM was documented in the in “Procedure De Gestion De La Chaîne D’ Approvisionnement Et De La Tracabilite” dated 07/07/2021. The documents state the SCCS roles and responsibilities of each personal that have been identified in the process. 4. Brabanta POM have established a Supply Chain Procedure entitled “Procedure De Gestion De La Chaîne D’ Approvisionnement Et De La Tracabilite” dated 07/07/2021. The document details the procedure for receiving certified and uncertified FFB at the mill. 		Complied
3.8.6	<p>Internal Audit</p> <ul style="list-style-type: none"> i. The mill shall have a written procedure to conduct annual internal audit to determine whether the mill; <ul style="list-style-type: none"> a. Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents. 	<p>Brabanta POM has established a documented procedure for Internal Audit entitled Management Procedure – Internal and External Audit Procedure.</p> <p>Latest internal audit was conducted for RSPO Supply Chain Requirements for Mills as per report Audit Internal Supply Chain dated 16/05/2022 – 23/05/2022.</p>		Complied

RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

	<ul style="list-style-type: none"> b. Effectively implements and maintains the standard requirements within its organisation. ii. Any non-conformities found as part of the internal audit shall be issued corrective action. The outcomes of the internal audits and all actions taken to correct non-conformities shall be subject to management review at least annually. The mill shall maintain the internal audit records and reports. 	<p>No non-conformity regarding supply chain was issued during the assessment. All records and reports of the Internal Audits were maintained and available for verification.</p>	
<p>3.8.7</p>	<p>Purchasing and Goods In</p> <ul style="list-style-type: none"> i. The mill shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBs received. ii. The mill shall inform the CB immediately if there is a projected overproduction of certified tonnage. iii. The mill shall have a mechanism in place for handling non-conforming FFB and/or documents. 	<p>The daily records are prepared at the entry point at the Brabanta POM weighbridge. When FFB delivered to the mill from the Brabanta supply base estates, the transporters presented Delivery Order (DO) to the mill weighbridge clerk in order the FFB to be received by the mill. Daily summary and monthly summary documented for all the certified FFB.</p> <p>The mill received certified and uncertified FFB from its own supply base estate and purchased loose fruits from the villagers. The records of FFB received was recorded in FFB delivery/consignment note, FFB weighbridge ticket and summarize in Mass Balance sheet.</p> <p>The management will inform CB if there is any overproduction of certified tonnage. They are aware on the overproduction as per stated in the procedure. Based on last review period, no overproduction recorded.</p> <p>Brabanta POM have established a Supply Chain Procedure entitled "Procedure De Gestion De La Chaîne D' Approvisionnement Et De La Tracabilite" dated 07/07/2021. The document under states, <i>for all industrial FFB sent to the factory without delivery documents, the weigher is not authorized to admit the tractor on the bridge for weighing; he has to return them to the truck.</i></p>	<p>Complied</p>
<p>3.8.8</p>	<p>Sales and Goods Out</p> <p>The supplying mill shall ensure that the following minimum information for RSPO certified products is made available in document form. The</p>	<p>As of to date all RSPO Products are sold as conventional. There were no sales of RSPO Certified products from the mill. Nevertheless, the mill has established procedure - Supply Chain Procedure entitled "Procedure De Gestion De La Chaîne D' Approvisionnement Et De La Tracabilite" dated</p>	<p>Complied</p>

RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

	<p>information shall be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation):</p> <ul style="list-style-type: none"> a. The name and address of the buyer; b. The name and address of the seller; c. The loading or shipment / delivery date; d. The date on which the documents were issued; e. RSPO certificate number; f. A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations); g. The quantity of the products delivered; h. Any related transport documentation; i. A unique identification number. 	<p>07/07/2021. The procedure details out the minimum information required for RSPO Certified Products when sold available in a document form.</p>	
<p>3.8.9</p>	<p>Outsourcing Activities</p> <ul style="list-style-type: none"> iii. The mill shall not outsource its milling activities. In cases where he mill outsources activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the mill holding the certificate shall ensure that the independent third party complies with relevant requirements of this RSPO Supply Chain Certification iv. The mill shall ensure the following: <ul style="list-style-type: none"> d. The mill has legal ownership of all input material to be included in outsourced processes e. The mill has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The onus is on the mill to ensure that certification body (CB) has access to the outsourcing 	<p>Brabanta POM does not outsource any of the activities. Transportation of CPO is by the buyer themselves as well, therefore the responsibility of the mill ends at the mill exit point. Hence this indicator is not applicable.</p>	<p>Not Applicable</p>

	<p>contractor or operation if an audit is deemed necessary.</p> <p>f. The mill has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.</p> <p>g. The mill shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to their respective operations, systems, and all information, when this is announced in advance.</p>		
3.8.10	The mill shall record the names and contact details of all contractors used for the physical handling of RSPO certified oil palm products.	There are no contractors involved in the physical handling of RSPO certified oil palm products.	Not Applicable
3.8.11	The mill shall inform its CB in advance prior to conduct of its next audit of the names and contact details of any new contractor used for the physical handling of RSPO certified oil palm products.	There are no contractors involved in the physical handling of RSPO certified oil palm products. Nevertheless, the management are aware that they are to inform if there are any contractors hired to be involved in the physical handling of RSPO certified oil palm products.	Not Applicable
3.8.12	<p>Record keeping</p> <p>i. The mill shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of this RSPO Supply Chain Certification Standard requirements.</p> <p>ii. Retention times for all records and reports shall be a minimum of two (2) years and shall comply with relevant legal and regulatory requirements and be able to confirm the certified status of raw materials or products held in stock.</p> <p>iii. For Identity Preserved Module, the mill shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis.</p> <p>iv. For Mass Balance Module, the mill:</p> <p>a. Shall record and balance all receipts of RSPO certified FFB and</p>	<p>Brabanta POM have kept records such as Supply Chain Procedures, SCCS Internal Audits, SCCS Trainings, Mass Balance Records and FFB Receive Notes that were available for verification.</p> <p>The records are kept for 2 years as per own SOP, Standard Operation Procedure for "Procedure De Gestion De La Chaîne D' Approvisionnement Et De La Tracabilite" dated 07/07/2021.</p> <p>Brabanta POM receives and processes both certified and non-certified FFB. Hence it uses the Mass Balance Module.</p> <p>a. The mill has recorded and balanced all receipts of RSPO certified FFB on three monthly basis. The records were available for verification.</p>	Complied

RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

	<p>deliveries of RSPO certified CPO and PK on a real-time basis and / or three-monthly basis.</p> <p>b. All volumes of certified CPO and PK that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO.</p> <p>c. The mill can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three (3) months. However, a mill is allowed to sell short (i.e. product can be sold before it is in stock.</p>	<p>b. Mass Balance record for 2022 was reviewed. There were no sales of Certified CPO. All downgraded CPO products sold were deducted from the accounting system.</p> <p>c. The mill only produces RSPO certified CPO. Nevertheless, there were no sales of RSPO Products by Brabanta POM.</p>	
3.8.13	<p>Extraction Rate</p> <p>The oil extraction rate (OER) and the kernel extraction rate (KER) shall be applied to provide a reliable estimate of the amount of certified CPO and PK from the associated inputs. Mill shall determine and set their own extraction rates based upon past experience, documented and applied it consistently.</p>	<p>Brabanta only produces CPO. The OER are measured daily and reported on a daily, weekly and summarized on a monthly and yearly basis through the mill production report. The OER is derived on an actual CPO production against the FFB received. The OER for the review period was recorded at 24.32%.</p> <p>The mill does not process tge PK due to economic reasons as the cost to sell the PK is more than the cost to produce PK mainly due to the volume and distance matters. The PK is sent back to the fields and used as mulch</p>	Complied
3.8.14	<p>Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate.</p>	<p>The facility is using the actual extraction rate and therefore updating of rates is not necessary.</p>	Complied
3.8.15	<p>Processing</p> <p>For Identity Preserved Module, the mill shall assure and verify through documented procedures and record keeping that the RSPO certified oil palm product is kept separated from non-certified oil palm products, including during transport and storage to strive for 100% separation.</p>	<p>Not applicable as Brabanta Palm Oil Mill is opted for Mass Balance module.</p>	Not Applicable
3.8.16	<p>Registration of Transactions</p> <p>i. Shipping Announcement in the RSPO IT platform shall be carried out by the mills when RSPO certified products are sold as certified to</p>	<p>Brabanta POM is registered is the Palmtrace platform. Nevertheless, since certification, the mill has not made any sales of RSPO Product. Hence there is no registration on the platform.</p>	Complied

	<p>refineries, crushers, and traders not more than three months after dispatch with the dispatch date being the Bill of Lading or the dispatch documentation date.</p> <p>ii. Remove: RSPO certified volumes sold under different scheme or as conventional, or in case of underproduction, loss or damage shall be removed in the RSPO IT platform.</p>		
3.8.17	<p>Claims</p> <p>The mill shall only make claims regarding the production of RSPO certified oil that are in compliance with the RSPO Rules on Market Communications and Claims.</p>	Brabanta POM has not made any claims for its sustainable products.	Complied
General corporate communications			
4.1	A corporate communication is one made by any RSPO member that highlights its membership of the RSPO and/or its commitment to the principles of the RSPO. Corporate communication is an 'off-product' claim.	Review of the Socfin Group website (https://www.socfin.com/en/certifications) establishes communication about the company's commitment to the RSPO standards.	Complied
4.2	<p>In corporate communications a member is allowed to:</p> <ul style="list-style-type: none"> 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. e. Use the RSPO trademark to promote its membership of the RSPO. <p>Additionally, where an RSPO member displays the RSPO trademark in digital format this must be accompanied by the text 'Check our progress at www.rspo.org' where the link must lead to the member's profile page.</p>	<p>In corporate communications,</p> <ul style="list-style-type: none"> a. Socfin SA has stated under "certification" that they are a member of RSPO: <i>Certification Of The Sustainable Aspect Of Our Palm Oil</i> and are 96% RSPO certified as of 09/03/2023. b. RSPO web address (www.rspo.org): The website has a link to www.rspo.org in certification tab> links> RSPO, at address: https://www.socfin.com/en/certification/ c. Via the Socfin SA website it was stated that the organisation's commitment "To ensure long-term sustainability of management systems and continuous improvement of operations, the Socfin Group monitors its activities by means of recognized and efficient certification systems." Via the RSPO certification. d. The website provided links to RSPO certificate of each certified unit which states the members history the RSPO. The website also has 	Complied

RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

		a certification tracking table, https://www.socfin.com/wp-content/uploads/2023/03/2023-03-09-Monitoring-of-certificates.pdf e. The website does not display RSPO trademark.	
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.	Socfin SA does not make any statement that may lead consumers to believe that RSPO membership by itself implies the selling of RSPO-certified oil palm products.	Complied
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.	Socfin SA ensure 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.	Complied
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 used as evidence during the document audit and site visit.	Complied
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.	Not Applicable as Brabanta POM has not made any sales of certified sustainable oil palm products.	Not Applicable
5.2	When confirming the sale of certified oil palm products, members must adhere to the requirements of the RSPO SCCS. This includes stating the supply chain model and certificate number under which the claim is being made.	Not Applicable as Brabanta POM has not made any sales of certified sustainable oil palm products.	Not Applicable
5.3	Where a distributor or wholesaler takes title to products containing certified sustainable oil palm products, the requirements of the RSPO SCCS can follow either of two options: 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,	Not applicable as Brabanta POM is neither distributors nor wholesalers.	Not Applicable

	<p>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>	Not Applicable as Brabanta POM has not made any sales of certified sustainable oil palm products.	Not Applicable
MODULE B – MASS BALANCE SPECIFIC RULES			
Minimum Mass Balance content			
	95% or above of the oil palm content must be RSPO MB-certified.	Oil palm content is 100% CPO and claim as RSPO MB-certified.	Complied
	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.	Oil palm content is 100% CPO and claim as RSPO MB-certified. All infeed material (FFB) is RSPO certified.	Complied
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'. 	As at to date, no RSPO trademark used by the facility.	Complied

	<ul style="list-style-type: none"> • 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. 		
Messaging (MB)			
	<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 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>As at to date, no RSPO trademark used by the facility.</p>	<p>Complied</p>

	<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. 		
<p>Principle 4: Respect community and human rights and deliver benefit Respect community rights, provide equal opportunities, maximise benefits from engagement and ensure remediation where needed.</p>			
<p>Criteria 4.1: The unit of certification respects human rights, which includes respecting the rights of Human Rights Defenders.</p>			
<p>4.1.1</p>	<p>(C) A policy to respect human rights, including prohibiting retaliation against Human Rights Defenders (HRD), is documented and communicated to all levels of the workforce, operations, supply chain and local communities and prohibits intimidation and harassment by the unit of certification and contracted services, including contracted security forces.</p> <p>- Critical (Major) compliance -</p>	<p>The company has a documented human rights policy dated 11/04/2019 and approved by the General Manager. The policy states that the company does not make distinctions with regard to race, colour, sex, religion and political opinion in all its activities. The policy was available for verification during the assessment.</p> <p>The company also has a documented policy for the protection of the Human Rights Defenders signed by the General Manager. The aim of this policy statement is to define how Brabanta creates an environment of mutual respect and how it is committed to developing an organizational culture that implements a policy of supporting human rights and seeks to avoid with passion any form of violation of human rights, as listed in the universal declaration of human rights. The document was available for verification during the assessment.</p> <p>The policy applies to everyone present on the premises of the company at all times, including, but not limited to all staff and their families and friends, third parties, visitors and suppliers of the company. The policy has been posted on the notice boards in and around the company and also communicated to the workers during their daily muster as confirmed by workers interviewed. Interview with the sample workers indicated they are aware and understand on the policies and their rights. Interview with the communities also indicated that the policy has been shared and communicated to them through the Community Liaison and</p>	<p>Complied</p>

RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

		that they understood the contents of the policies. Interviews with workers and communities did not establish abuse of human rights by the company	
4.1.2	The unit of certification does not instigate violence or use any form of harassment, including the use of mercenaries and paramilitaries in their operations. - Minor compliance -	Interview with both communities and workers indicate the company does not use mercenaries or paramilitaries to instigate violence or harass workers or the communities. Verification done on the complaints and grievance log also indicated that there were no reports of the use of any form of harassment including the use of mercenaries and paramilitaries in the operations.	Complied
Criteria 4.2: There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all affected parties.			
4.2.1	(C) The mutually agreed system, open to all affected parties, resolves disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants, HRD, community spokespersons and whistleblowers, where requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRD. - Critical (Major) compliance -	The company has a documented procedure captioned Procedure de Gestion des Grievs Internes et Externes (Internal and External Grievance Management Procedure) last updated on the 31/01/2020. The purpose of the procedure is to show to the external stakeholders that the company understands the importance of having a plan in place that provides a means for potentially affected stakeholders to have their issues addressed. The procedure reviewed has provisions for timelines for addressing a grievance and also respect the anonymity of a complainant if the person chooses so.	Complied
4.2.2	Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties. - Minor compliance -	The procedure has been shared with the various communities through their representatives as confirmed during the community engagements. The communities during the engagements demonstrated understanding of the procedures.	Complied
4.2.3	The unit of certification keeps parties to a grievance informed of its progress, including against agreed timeframe and the outcome is available and communicated to relevant stakeholders. - Minor compliance -	Review of the procedures indicates the company's liaison officer is responsible for receiving all grievances and communicating the progress and outcomes to the complainants. During an interview with the liaison officer he indicated all grievances received are recorded in their grievance log book and the progress are also recorded. A review of the	Complied

RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

		grievance log book shows a total of seven complaint have been received and all have been addressed to their conclusion except for one that is still pending.	
4.2.4	The conflict resolution mechanism includes the option of access to independent legal and technical advice, the ability for complainants to choose individuals or groups to support them and/or act as observers, as well as the option of a third-party mediator. - Minor compliance -	The company has a documented procedure captioned Procedure de Gestion des Griefs Internes et Externes (Internal and External Grievance Management Procedure) last updated on the 31/01/2020. The procedure states the conflict resolution mechanism which includes the option of access to independent legal and technical advice, the ability for complainants to choose individuals or groups to support them and/or act as observers, as well as the option of a third-party mediator.	Complied
Criteria 4.3: The unit of certification contributes to local sustainable development as agreed by local communities.			
4.3.1	Contributions to community development that are based on the results of consultation with local communities are demonstrated. - Minor compliance -	The company has a documented action plan captioned Plan D'Action Gestion Sociale dated 5 th July 2021. It is a five-year implementation plan from 2019-2024. The plan identifies the communities and their specific needs. The plan was developed in consultations with the communities to identify their need after the Social Impact Assessment was conducted. A review of the plan shows the company has identified social development needs to undertake in consultations with the communities. Some of the developments include schools, roads, employments, markets, access to water and others. There are timelines for each planned project. The action plan was developed in consultations with a total of 27 communities. The plan captures all the needs of the communities and the planned date for their implementation. Records of the minutes of meetings with all the different community representatives and their evidence of attendance was made available for review. Some examples of projects implemented as per the plan include <ol style="list-style-type: none"> 1. Rehabilitation of schools in Kadima, Mapangu 2. Built a new school in the Lumbunji community 	Complied

RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

		Interview with community representatives from Malanyo-Bwanga, Mapangu-village, Ngoyi, Kadima, MC-Mapangu, Kayaya-Riviere all confirmed meetings with the company to discuss community needs. They also indicated that every year, each community is giving 50 liters of palm oil by the company.	
Criteria 4.4: Use of the land for oil palm does not diminish the legal, customary or user rights of other users without their free, prior and informed consent.			
4.4.1	<p>(C) Documents showing legal ownership or lease, or authorised use of customary land authorised by customary landowners through a Free, Prior and Informed Consent (FPIC) process. Documents related to the history of land tenure and the actual legal or customary use of the land are available.</p> <p>- Critical (Major) compliance -</p>	<p>The company has documents showing legal rights to the use of land for Brabanta operations. Copies of the land title documents were made available to the audit team for review. The land was leased in 2015 for a period of twenty-five years. Also copies of payment of land tax made to the Ministries of Finance, Kasai-Occidental province were seen and reviewed by the audit team. The latest payment done with reference number 0100/CAB/MIN/AFF/2020 for <i>Division Provinciale de AFF Foncieres RCA/2022</i> made on the 19/03/2022 for an amount of 5,122,458.44 CDF.</p> <p>Interview with representatives from the Malanyo-Bwanga, Mapangu-village, Ngoyi, Kadima, MC-Mapangu, Kayaya-Riviere all confirmed there are no land dispute with the company.</p>	Complied
4.4.2	<p>Copies of documents evidencing agreement-making processes and negotiated agreements detailing the FPIC process are available and include:</p> <p>- Minor compliance -</p> <p>4.4.2a Evidence that a plan has been developed through consultation and discussion in good faith with all affected groups in the communities, with particular assurance that vulnerable, minorities' and gender groups are consulted, and that information has been provided to all affected groups, including information on the steps that are taken to involve them in decision making</p>	<p>Agreements leading to the transfer of land rights was made between the Government and Brabanta with no communities contributing land to the operations.</p> <p>There are other lands that were acquired directly from the communities after successful negotiations with Socfin SA. However, those areas are not included in the scope of this certification. These are the uncertified Savane and Lumbunji estates.</p>	Complied

	<p>4.4.2b Evidence that the unit of certification has respected communities' decisions to give or withhold their consent to the operation at the time that these decisions were taken</p>	<p>There is no evidence of any local community land that requires discussions or involve consents of affected community groups. The estate was an existing palm plantation before its acquisition by the company from the state. The company has also not expanded beyond the legally acquired boundaries. However, review of documents shows engagements with local communities on social support to the different communities and the operations of the company.</p> <p>Details of the land historical ownership are as per Indicator 4.4.1 above.</p>	
	<p>4.4.2c Evidence that the legal, economic, environmental and social implications of permitting operations on their land have been understood and accepted by affected communities, including the implications for the legal status of their land at the expiry of the unit of certification's title, concession or lease on the land.</p>	<p>There is no evidence of any local community land that requires discussions or involve consents of affected community groups. The estate was an existing palm plantation before its acquisition by the company from the state. The company has also not expanded beyond the legally acquired boundaries. However, review of documents shows engagements with local communities on social support to the different communities and the operations of the company.</p> <p>Details of the land historical ownership are as per Indicator 4.4.1 above.</p>	
<p>4.4.3</p>	<p>(C) Maps of an appropriate scale showing the extent of recognised legal, customary or user rights are developed through participatory mapping involving affected parties (including neighbouring communities where applicable, and relevant authorities). - Critical (Major) compliance -</p>	<p>The company has maps showing all land under their concessions. Although none of the communities contributed land to the operational areas under the scope of this audit, the company engages and ensures community participation in all land related issues</p>	<p>Complied</p>
<p>4.4.4</p>	<p>All relevant information is available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements. - Minor compliance -</p>	<p>Although the company did not acquire land (under the scope of this audit) from the communities, Brabanta shares all relevant information including policies, procedures and assessment reports with the communities.</p>	<p>Complied</p>
<p>4.4.5</p>	<p>(C) Evidence is available to show that communities are represented through institutions or representatives of their own choosing, including by legal counsel if they so choose.</p>	<p>Communities indicated during the stakeholder engagements that they are represented by their traditional leaders or representatives of selected group (women and youth group leaders). They also indicated</p>	<p>Complied</p>

RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

	- Critical (Major) compliance -	that when there is the need to change a representative of the community, letters are sent to the Head of Sector of Mapangu who will officially write to the company. However, there has not been any of such incidents	
4.4.6	There is evidence that implementation of agreements negotiated through FPIC is annually reviewed in consultation with affected parties. - Minor compliance -	There is no evidence of any local community land involved and so this indicator is not applicable.	Not Applicable
Criteria 4.5: No new plantings are established on local peoples' land where it can be demonstrated that there are legal, customary or user rights, without their FPIC. This is dealt with through a documented system that enables these and other stakeholders to express their views through their own representative institutions.			
4.5.1	(C) Documents showing identification and assessment of demonstrable legal, customary and user rights are available. - Critical (Major) compliance -	Brabanta is an existing plantation and no new plantings has been carried out within the scope of this assessment. Also all within the scope of this assessment for Brabanta operations were acquired through negotiated agreement with the government of Congo DR. None of the communities contributed land to the operations under the scope of this assessment. Hence, this indicator is not applicable.	Not Applicable
4.5.2	(C) FPIC is obtained for all oil palm development through a comprehensive process, including in particular, full respect for their legal and customary rights to the territories, lands and resources via local communities' own representative institutions, with all the relevant information and documents made available, with option of resourced access to independent advice through a documented, long-term and two-way process of consultation and negotiation. - Critical (Major) compliance -	Brabanta is an existing plantation and no new plantings has been carried out within the scope of this assessment. Also all within the scope of this assessment for Brabanta operations were acquired through negotiated agreement with the government of Congo DR. None of the communities contributed land to the operations under the scope of this assessment. Hence, this indicator is not applicable.	Not Applicable
4.5.3	Evidence is available that affected local peoples understand they have the right to say 'no' to operations planned on their lands before and during initial discussions, during the stage of information gathering and associated consultations, during negotiations, and up until an agreement with the unit of certification is signed and ratified by these local peoples.	Brabanta is an existing plantation and no new plantings has been carried out within the scope of this assessment. Also all within the scope of this assessment for Brabanta operations were acquired through negotiated agreement with the government of Congo DR. None of the communities	Not Applicable

RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

	<p>Negotiated agreements are non-coercive and entered into voluntarily and carried out prior to new operations.</p> <p>- Minor compliance -</p>	<p>contributed land to the operations under the scope of this assessment. Hence, this indicator is not applicable.</p>	
4.5.4	<p>To ensure local food and water security, as part of the FPIC process, participatory SEIA and participatory land-use planning with local peoples, the full range of food and water provisioning options are considered. There is transparency of the land allocation process.</p> <p>- Minor compliance -</p>	<p>Brabanta is an existing plantation and no new plantings has been carried out within the scope of this assessment. Also all within the scope of this assessment for Brabanta operations were acquired through negotiated agreement with the government of Congo DR. None of the communities contributed land to the operations under the scope of this assessment. Hence, this indicator is not applicable.</p>	Not Applicable
4.5.5	<p>Evidence is available that the affected communities and rights holders have had the option to access to information and advice that is independent of the project proponent, concerning the legal, economic, environmental and social implications of the proposed operations on their lands.</p> <p>- Minor compliance -</p>	<p>Brabanta is an existing plantation and no new plantings has been carried out within the scope of this assessment. Also all within the scope of this assessment for Brabanta operations were acquired through negotiated agreement with the government of Congo DR. None of the communities contributed land to the operations under the scope of this assessment. Hence, this indicator is not applicable.</p>	Not Applicable
4.5.6	<p>Evidence is available that the communities (or their representatives) gave consent to the initial planning phases of the operations prior to the issuance of a new concession or land title to the operator.</p> <p>- Minor compliance -</p>	<p>Brabanta is an existing plantation and no new plantings has been carried out within the scope of this assessment. Also all within the scope of this assessment for Brabanta operations were acquired through negotiated agreement with the government of Congo DR. None of the communities contributed land to the operations under the scope of this assessment. Hence, this indicator is not applicable.</p>	Not Applicable
4.5.7	<p>New lands will not be acquired for plantations and mills after 15 November 2018 as a result of recent (2005 or later) expropriations in the national interest without consent (eminent domain), except in cases of smallholders benefitting from agrarian reform or anti-drug programmes.</p> <p>- Minor compliance -</p>	<p>Brabanta is an existing plantation and no new plantings has been carried out within the scope of this assessment. Also all within the scope of this assessment for Brabanta operations were acquired through negotiated agreement with the government of Congo DR. None of the communities contributed land to the operations under the scope of this assessment. Hence, this indicator is not applicable.</p>	Not Applicable

4.5.8	<p>(C) New lands are not acquired in areas inhabited by communities in voluntary isolation.</p> <p>- Critical (Major) compliance -</p>	<p>Brabanta is an existing plantation and no new plantings has been carried out within the scope of this assessment. Also all within the scope of this assessment for Brabanta operations were acquired through negotiated agreement with the government of Congo DR. None of the communities contributed land to the operations under the scope of this assessment. Hence, this indicator is not applicable.</p>	Not Applicable
<p>Criteria 4.6: Any negotiations concerning compensation for loss of legal, customary or user rights are dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.</p>			
4.6.1	<p>(C) A mutually agreed procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, is in place.</p> <p>- Critical (Major) compliance -</p>	<p>Brabanta is an existing plantation and no new plantings has been carried out within the scope of this assessment. Also all within the scope of this assessment for Brabanta operations were acquired through negotiated agreement with the government of Congo DR. None of the communities contributed land to the operations under the scope of this assessment. Therefore,, there were no need for negotiations on compensations for this matter. Hence, this indicator is not applicable.</p>	Not Applicable
4.6.2	<p>(C) A mutually agreed procedure for calculating and distributing fair and gender-equal compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation.</p> <p>- Critical (Major) compliance -</p>	<p>Brabanta is an existing plantation and no new plantings has been carried out within the scope of this assessment. Also all within the scope of this assessment for Brabanta operations were acquired through negotiated agreement with the government of Congo DR. None of the communities contributed land to the operations under the scope of this assessment. Therefore,, there were no need for negotiations on compensations for this matter. Hence, this indicator is not applicable.</p>	Not Applicable
4.6.3	<p>Evidence is available that equal opportunities are provided to both men and women to hold land titles for small holdings.</p> <p>- Minor compliance -</p>	<p>Brabanta is an existing plantation and no new plantings has been carried out within the scope of this assessment. Also all within the scope of this assessment for Brabanta operations were acquired through negotiated agreement with the government of Congo DR. None of the communities contributed land to the operations under the scope of this assessment. Therefore,, there were no need for negotiations on compensations for this matter. Hence, this indicator is not applicable.</p>	Not Applicable

RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

4.6.4	<p>The process and outcomes of any negotiated agreements, compensation and payments are documented, with evidence of the participation of affected parties, and made publicly available to them.</p> <p>- Minor compliance -</p>	<p>Brabanta is an existing plantation and no new plantings has been carried out within the scope of this assessment. Also all within the scope of this assessment for Brabanta operations were acquired through negotiated agreement with the government of Congo DR. None of the communities contributed land to the operations under the scope of this assessment. Therefore,, there were no need for negotiations on compensations for this matter. Hence, this indicator is not applicable.</p>	Not Applicable
<p>Criteria 4.7: Where it can be demonstrated that local peoples have legal, customary or user rights, they are compensated for any agreed land acquisitions and relinquishment of rights, subject to their FPIC and negotiated agreements.</p>			
4.7.1	<p>(C) A mutually agreed procedure for identifying people entitled to compensation is in place.</p> <p>- Critical (Major) compliance -</p>	<p>Brabanta is an existing plantation and no new plantings has been carried out within the scope of this assessment. Also all within the scope of this assessment for Brabanta operations were acquired through negotiated agreement with the government of Congo DR. None of the communities contributed land to the operations under the scope of this assessment. Therefore,, there were no need for negotiations on compensations for this matter. Hence, this indicator is not applicable.</p>	Not Applicable
4.7.2	<p>(C) A mutually agreed procedure for calculating and distributing fair compensation (monetary or otherwise) is in place and documented and made available to affected parties.</p> <p>- Critical (Major) compliance -</p>	<p>Brabanta is an existing plantation and no new plantings has been carried out within the scope of this assessment. Also all within the scope of this assessment for Brabanta operations were acquired through negotiated agreement with the government of Congo DR. None of the communities contributed land to the operations under the scope of this assessment. Therefore,, there were no need for negotiations on compensations for this matter. Hence, this indicator is not applicable.</p>	Not Applicable
4.7.3	<p>Communities that have lost access and rights to land for plantation expansion are given opportunities to benefit from plantation development.</p> <p>- Minor compliance -</p>	<p>Brabanta is an existing plantation and no new plantings has been carried out within the scope of this assessment. Also all within the scope of this assessment for Brabanta operations were acquired through negotiated agreement with the government of Congo DR. None of the communities contributed land to the operations under the scope of this assessment.</p>	Not Applicable

RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

		Therefore,, there were no need for negotiations on compensations for this matter. Hence, this indicator is not applicable.	
Criteria 4.8: The right to use the land is demonstrated and is not legitimately contested by local people who can demonstrated that they have legal customary, or user rights.			
4.8.1	Where there are or have been disputes, proof of legal acquisition of title and evidence that mutually agreed compensation has been made to all people who held legal, customary, or user rights at the time of acquisition is available and provided to parties to a dispute, and that any compensation was accepted following a documented process of FPIC. - Minor compliance -	Brabanta has land titled documents showing their rights to the use of the land and also there are no dispute on the land as confirmed by the communities (Malanyo-Bwanga, Mapangu-village, Ngoyi, Kadima, Mapangu, Kayaya-Riviere) during the community engagements. If disputes arises, the company has a grievance procedure in place which is well known by the communities to be used to address such disputes. Furthermore, the country legal regulations can be used to address such land disputes if any.	Complied
4.8.2	(C) Land conflict is not present in the area of the unit of certification. Where land conflict exists, acceptable conflict resolution processes (see Criteria 4.2 and 4.6) are implemented and accepted by the parties involved. In the case of newly acquired plantations, the unit of certification addresses any unresolved conflict through appropriate conflict resolution mechanisms. - Critical (Major) compliance -	Brabanta has land titled documents showing their rights to the use of the land and also there are no dispute on the land as confirmed by the communities (Malanyo-Bwanga, Mapangu-village, Ngoyi, Kadima, Mapangu, Kayaya-Riviere) during the community engagements. If disputes arises, the company has a grievance procedure in place which is well known by the communities to be used to address such disputes. Furthermore, the country legal regulations can be used to address such land disputes if any.	Complied
4.8.3	Where there is evidence of acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations and there remain parties with demonstrable customary and land use right, there claims will be settled using the relevant requirements (Indicator 4.4.2, 4.4.3 and 4.4.4). - Minor compliance -	Brabanta has land titled documents showing their rights to the use of the land and also there are no dispute on the land as confirmed by the communities (Malanyo-Bwanga, Mapangu-village, Ngoyi, Kadima, Mapangu, Kayaya-Riviere) during the community engagements. If disputes arises, the company has a grievance procedure in place which is well known by the communities to be used to address such disputes. Furthermore, the country legal regulations can be used to address such land disputes if any.	Complied

4.8.4	<p>For any conflict or dispute over the land, the extent of the disputed area is mapped out in participatory way with involvement of affected parties (including neighbouring communities where applicable).</p> <p>- Minor compliance -</p>	<p>Brabanta has land titled documents showing their rights to the use of the land and also there are no dispute on the land as confirmed by the communities (Malanyo-Bwanga, Mapangu-village, Ngoyi, Kadima, Mapangu, Kayaya-Riviere) during the community engagements. If disputes arises, the company has a grievance procedure in place which is well known by the communities to be used to address such disputes. Furthermore, the country legal regulations can be used to address such land disputes if any.</p>	Complied															
<p>Principle 5: Support smallholder inclusion Include smallholders in RSPO supply chains and improve their livelihoods through fair and transparent partnerships.</p>																		
<p>Criteria 5.1: The unit of certification deals fairly and transparently with all smallholders (Independent and Scheme) and other local businesses.</p>																		
5.1.1	<p>Current and previous period prices paid for FFB are publicly available and accessible by smallholders.</p> <p>- Minor compliance -</p>	<p>Current and previous period prices are publicly displayed at the weighbridge office for the reference of the FFB suppliers mainly Village FFB Collectors (<i>Collecteurs villageois de FFB</i>). During the visit to the mill weighbridge, the FFB Price was displayed as below.</p> <table border="1" data-bbox="1131 922 1971 1072"> <thead> <tr> <th colspan="5"><i>TABLEAU D'EVOLUTION PRIX D'ACHAT NOIX VILLAGEOISES</i></th> </tr> <tr> <th>Annee</th> <th>2019</th> <th>2020</th> <th>2021</th> <th>2022</th> </tr> </thead> <tbody> <tr> <td>Montant</td> <td>FC 5.000</td> <td>FC 6.000</td> <td>FC 6.500</td> <td>FC 6.5000</td> </tr> </tbody> </table> <p>The Village FFB Collectors have a contract agreement, stating the price of the FFB and Loose Fruits, dated 08/10/2021. Any discrepancies of weight or prices paid can be brought forward to the mill management through the grievance procedures that have been in place.</p>	<i>TABLEAU D'EVOLUTION PRIX D'ACHAT NOIX VILLAGEOISES</i>					Annee	2019	2020	2021	2022	Montant	FC 5.000	FC 6.000	FC 6.500	FC 6.5000	Complied
<i>TABLEAU D'EVOLUTION PRIX D'ACHAT NOIX VILLAGEOISES</i>																		
Annee	2019	2020	2021	2022														
Montant	FC 5.000	FC 6.000	FC 6.500	FC 6.5000														
5.1.2	<p>(C) Evidence is available that the unit of certification regularly explains the FFB pricing to smallholders.</p> <p>- Critical (Major) compliance -</p>	<p>There are no smallholders within the Brabanta certification unit. Nevertheless, Brabanta POM receives non-certified FFB, mainly loose fruit from neighbouring villagers. Interview with the Village FFB Collectors indicate that they are aware on the pricing mechanism of Brabanta POM as they have attended a meeting on the FFB Pricing.</p>	Complied															

RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

		Verified the “ <i>Rapport Des Reunions Avec Les Coupeurs Des Noix Villageoises</i> ” conducted on 18/12/2021 for all Village FFB Collectors.	
5.1.3	<p>(C) Fair pricing, including premium pricing, when applicable, is agreed with smallholders in the supply base and documented.</p> <p>- Critical (Major) compliance -</p>	<p>Brabanta SA has established a procedure entitled Procedure Operationnelle Stantard De Fixation Des Prix Noix Villageoise, dated 20/10/2021 which guides the management on determining the FFB price to be paid by the mill to the Village FFB Collectors.</p> <p>The procedure states that the price for the FFB/Loose Fruits is determined from the market taking a number of variables into consideration with the starting point being the price of CPO which is set by the Government. Other considerations are the type of the fruit (Dura, Pisifera or the Tenera), the extraction rate, transport (whenever applicable depending on whether it is bought directly from the communities or 3rd party suppliers).</p>	Complied
5.1.4	<p>(C) Evidence is available that all parties, including women and independent representative organisations assisting smallholders where requested, are involved in decision-making processes and understand the contracts. These include those involving finance, loans/credits, and repayments through FFB price reductions for replanting and or other support mechanisms where applicable.</p> <p>- Critical (Major) compliance -</p>	<p>There are no smallholders within the Brabanta Certification Unit. Nevertheless, the mill receives uncertified FFB/Loose Fruits from neighbouring Villager. Hence the Village FFB Collectors are involved during the explanation of pricing and explanation of contract agreements between them and the mill. As they are only collectors and not farmers, they are not provided any financing or loans hence no repayments are involved in their transactions.</p>	Complied
5.1.5	<p>Contracts are fair, legal and transparent and have an agreed timeframe.</p> <p>- Minor compliance -</p>	<p>The company provided evidence of a contract agreement (Contract D’Achat Noix Villageois dated 08/10/2021) with FFB Collectors signed by the Director General and had signatures of Representatives of the Communities, which according to the company are the chiefs and the people who could read and write. Interview with the representatives of FFB Collectors invited by the company to meet with the audit team confirmed to be aware of the price of the loose palm fruits they sell to the company.</p>	Non-compliance

RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

		Nevertheless, the contract agreement entitled <i>Contract D'Achat Noix Villageois</i> dated 08/10/2021 between Brabanta and the Village FFB Collectors did not have an agreed timeframe stated in it. Since, this is a reoccurrence of minor non-conformity, a critical non-conformity was raised.	
5.1.6	<p>(C) Agreed payments are made in a timely manner and receipts specifying price, weight, deductions and amount paid are given.</p> <p>- Critical (Major) compliance -</p>	Fruits collected are received by the company representatives at the collection sites in pre-calibrated 25 kg boxes and records for the collectors and quantity of fruits are taken. Collected fruits are delivered and weighed at the company's weighbridge to cross-check with the recorded quantity. Payment is made in cash to the representatives of FFB Collectors who in turn make payments to individual collectors. The company maintains a sheet on which individual FFB Collectors within specific collection community or site signs as receipt for the amount of money for their sale at any particular week. The sheet titled "Operation D'achat Des Noix Villageoises Pour Brabanta" indicates the site of fruit collection, the date, the name of the cutter/collector, quantity (number of boxes), unit price, the total amount and the signature of the collector. Records of such payment were available for verification. A meeting with the representatives of the FFB Collectors during the audit confirm that, payment is made 3 to 4 days after sales. Records of weighbridge tickets were cross checked with the payment records and indicated that all payments have been provided within the agreed timeline.	Complied
5.1.7	<p>Weighing equipment is verified by an independent third party on a regular basis (this can be government).</p> <p>- Minor compliance -</p>	Brabanta POM Weighing Equipment for measurement of quantity of FFB/Loose Fruits purchased from FFB Collectors are independently calibrated. The Equipment are the company's weighbridge and a standing scale used to calibrate the 25kg boxes used to measure loose palm fruits from collectors. The latest calibration was conducted on 08/06/2021. The calibration for the year 2022 was planned for June 2022 by the Metrology Department of Kinshasa. Nevertheless, the equipment's required for calibration did not arrive at Kinshasa during their mission period hence the calibration could not be done. Records of	Complied

		communication and acknowledgement of the Metrology Department were available for verification. The Metrology Department have agreed for the calibration to be done in early 2023.	
5.1.8	The unit of certification supports Independent Smallholders with certification, where applicable, ensuring mutual agreements between the unit of certification and the smallholders on who runs the internal control system (ICS), who holds the certificates, and who holds and sells the certified material. - Minor compliance -	There are no Smallholders within the Brabanta Certification Unit. The Village FFB Collectors are mere collectors and not farmers. Hence this indicator is not applicable.	Not Applicable
5.1.9	(C) The unit of certification has a grievance mechanism for smallholders and all grievances raised are dealt with in a timely manner. - Critical (Major) compliance -	There were no Smallholders within the Brabanta Certification Unit. The company however has FFB Collectors who collect palm fruits from the wild and supply to its mill. The company has grievance mechanism procedures (Procedure De Gestion Des Griefs Externs Index 02 of 16 September 2015) in place which is applicable to its FFB Collectors.	Complied
Criteria 5.2: The unit of certification supports improved livelihoods of smallholders and their inclusion in sustainable palm oil value chains.			
5.2.1	The unit of certification consults with interested smallholders (irrespective of type) including women or other partners in their supply base to assess their needs for support to improve their livelihoods and their interest in RSPO certification. - Minor compliance -	Brabanta did not have smallholders, but Villagers Loose Fruit Collectors as mentioned in different sections of this report. Loose fruit collection is done at community level and the company deals with collectors as a community. The company consulted with the communities within which loose palm fruits are collected and provided evidence for review during the audit. The review confirmed that consultation with the communities included issues and concerns of FFB Collectors. For example the villagers are allowed to use the Brabanta Hospital facility.	Complied
5.2.2	The unit of certification develops and implements livelihood improvement programmes, including at least capacity building to enhance productivity, quality, organisational and managerial competencies, and specific elements of RSPO certification (including the RSPO Standard for Independent Smallholder).	Brabanta did not have smallholders, but Villagers Loose Fruit Collectors as mentioned in different sections of this report. The company conducts livelihood improvement programmes incorporated the meetings conducted with the Loose Fruit Collectors. Interview with the sampled Loose Fruit Collectors and communities during the audit confirmed that the management has given them training on loose fruits picking to	Complied

	- Minor compliance -	include the quality of fruits, sensitisation on policies and procedures among others. According to the management, they are committed to ensure improvements on the livelihood of the LF Collectors which indirectly benefits the organisation also.	
5.2.3	Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production. - Minor compliance -	There are no smallholders within the Brabanta Certification Unit. Hence, the indicator is not applicable.	Not Applicable
5.2.4	(C) Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling. - Critical (Major) compliance -	There are no smallholders within the Brabanta Certification Unit. Hence, the indicator is not applicable.	Not Applicable
5.2.5	The unit of certification regularly reviews and publicly reports on the progress of the smallholder support programme. - Minor compliance -	There are no smallholders within the Brabanta Certification Unit. Hence, the indicator is not applicable.	Not Applicable
Principle 6: Respect workers' rights and conditions			
Protect workers' rights and ensure safe and decent working conditions.			
Criteria 6.1: Any form of discrimination is prohibited.			
6.1.1	(C) A publicly available non-discrimination and equal opportunity policy is implemented in such a way to prevent discrimination based on ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age. - Critical (Major) compliance -	The company has an Anti- Discrimination policy dated 09/09/2020 and signed by the Director General. The policy indicates that the company respects the laws of the country which prohibits all forms discrimination in the workplace based on ethnic or racial origin, sex, handicap, place of origin, marital status, etc. The company ensures all have equal opportunities regarding recruitment, working conditions, promotion, remuneration, access to vocational training, retirement pension and dismissal. The policy was observed to be displayed on all the notice boards in and around the company.	Complied

RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

6.1.2	<p>(C) Evidence is provided that workers and groups including local communities, women, and migrant workers have not been discriminated against. Evidence includes migrant workers' non-payment of recruitment fees.</p> <p>- Critical (Major) compliance -</p>	<p>There are no migrant workers in the Brabanta plantations except for the position of senior management. Interview with workers in the three estates and with the workers' representatives and communities indicates workers including local communities and women all confirmed they have not witness any case of discrimination against any one by the company.</p>	Complied
6.1.3	<p>The unit of certification demonstrates that recruitment selection, hiring, access to training and promotion are based on skills, capabilities, qualities and medical fitness necessary for the jobs available.</p> <p>- Minor compliance -</p>	<p>The company has a documented procedure for the recruitment of workers which was made available to the audit team for review. The document is dated 09/07/2019 and approved by the General Director. The recruitment process starts with the identification of a vacant position which is reported and validated by the GM.</p> <p>For unskilled labour, announcement is made at the muster in the morning. For skill labour the advert is post on the notice boards in the villages and communities</p> <p>When a contract is made it is signed by both the Director General and the employee. The signed contract is then sent to the National Office for Employment (ONEM), a government agency for approval to ensure compliance with the labour law.</p> <p>Interview with the Human Resource Manager indicates the company has not undertaken any staff recruitment during the period under review.</p>	Complied
6.1.4	<p>Pregnancy testing is not conducted as a discriminatory measure and is only permissible when it is legally mandated. Alternative equivalent employment is offered for pregnant women.</p> <p>- Minor compliance -</p>	<p>The company by the law does not carry out pregnancy test on the female worker either before or after recruitment as stated by the Personnel manager. Also interview with the medical officer indicated that pregnancy test is carried out only upon request by the female workers. Interview with the female workers in Kanaiga and Sagna Sagna estate confirmed the company does not conduct pregnancy test on them. As and when they request to undergo a pregnancy test and are confirmed to be pregnant, the medical officer sends a memo to the management for the particular worker to be provided with a lighter and non-hazardous job. Post pregnancy maternity leave are also provided to the workers.</p>	Complied

RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

6.1.5	<p>(C) A gender committee is in place specifically to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women.</p> <p>- Critical (Major) compliance -</p>	<p>The company has a gender committee in place formed in 11th September 2019 with the aim of ensuring no sexual harassment at the work place, pregnant women do not handle chemical activities, breastfeeding women have enough time to breast feed the children identification of new mothers needs and ensure there are no discrimination against women for promotion. The gender committee has a list of members made up of 2 men and 5 women. The committee meets once every three months and ones each week with the entire workers. Copies of the minutes of meetings were made available to the audit for review.</p> <p>Interview with 9 female workers in the kadima estate confirmed their awareness of the gender committee and has had engagement with the committee.</p>	Complied
6.1.6	<p>There is evidence of equal pay for the same work scope.</p> <p>- Minor compliance -</p>	<p>The company has a salary grade captioned Grille Salariale dated October 2022 and has been approved by both Director General and the representatives of all the four workers' union in the company. The salary grade reviewed covers both the permanent and temporal workers. Copies of the signed salary grade has been shared with the president of the four workers' union. The salary grade for all new employees are also included in their contract documents. The salary grade identifies the position of the worker and corresponding salary. Interview with sampled workers in the three estates all confirmed there are equal pay for equal work done.</p>	Complied
<p>Criteria 6.2: Pay and conditions for staff and workers and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages (DLW).</p>			
6.2.1	<p>(C) Applicable labour laws, union and/or other collective agreements and documentation of pay and conditions are available to the workers in national languages and explained to them in language they understand.</p> <p>- Critical (Major) compliance -</p>	<p>The company has a documented collective agreement which was the result of an agreement between representative of the workers and Management of Brabanta Palm Oil Mill. The Collective agreement is dated May 2018 and signed by the representatives from both the company and workers. The agreement details the grading, salary</p>	Complied

RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

		<p>structure, working hours, overtime and other conditions of service.</p> <p>The employee arrangement in the company are Management and Unionized workers (temporal and permanent workers) and all the unionised workers are covered by the agreement. The content of the Condition of Service which is written in French, has been explain to the understanding of all the workers in the local language.</p> <p>In addition, workers are issued with pay slip which contains detailed information on payment and deduction. Information on the payslip include basic salary, holidays, taxes deductions, allowances and net salary. Interview with the worker shows they have an understanding of the information on the payslip.</p>	
6.2.2	<p>(C) Employment contracts and related documents detailing payments and conditions of employment (e.g. regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. in compliance with national legal requirements) and payroll documents give accurate information on compensation for all work performed, including work done by family members.</p> <p>- Critical (Major) compliance -</p>	<p>Review of sampled employment contracts and pay slips shows details of the conditions of employment are clearly outlined. Some of the conditions include hours of work, basic salary, worker’s salary grade, contract duration, overtime, and many more.</p> <p>The contracts documents are written in French which is the official written and spoken language. Interview with the workers in K10 in Kanaiga estate, D9 in Kadima estate indicated the content of their contracts were explain to their understanding before thumb printing or signing.</p> <p>Sampled contract of workers with matricula numbers 001332, 008062 and 0088285 were reviewed and all had the details on the conditions of employment stated in the contract.</p> <p>Interview with the workers confirm all information provided on the payslips are accurate and the pay they receive are consistent with the terms of the contract</p>	Complied
6.2.3	<p>(C) There is evidence of legal compliance for regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave,</p>	<p>Review of the contract document, payslips and conditions of service for the unionized workers indicated the normal hours of work for all employees shall be 40 hours a week. Interview with the workers and</p>	Complied

RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

	<p>reasons for dismissal, period of notice and other legal labour requirements.</p> <p>- Critical (Major) compliance -</p>	<p>the four worker’s union also indicated that any work done at the request of the employer after completing the standard daily eight hours of work in a weekday is treated as overtime. Regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal have all been captured in the workers’ conditions of service and are in compliance with the Congo Labour Act. Review of appointment letters, workers conditions of service and payslips were found to be in compliance with the Labour law.</p>	
6.2.4	<p>(C) The unit of certification provides adequate housing, sanitation facilities, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. National laws, or in their absence the ILO Guidance on Workers’ Housing Recommendation No. 115, are used. In the case of acquisitions of non-certified units, a plan is developed detailing the upgrade of infrastructure. A reasonable time (5 years) is allowed to upgrade the infrastructure.</p> <p>- Critical (Major) compliance -</p>	<p>The company has made available to most of their workers housing units and for workers not residing in company houses they are given monthly allowance as house rent. Sampled payslips for workers not residing in company houses were made available for review. They include workers with matricula number 004474, 008385, 001332, 008062 and all confirmed payment of housing allowance.</p> <p>The company has a housing policy which defines the criteria for the allocation and management of housing made available to their employees. The policy is applicable to both temporal and permanent workers. The company has also developed a five-year housing plan (2022 to 2026) which aims at making more houses available to accommodate the workers. The plan was made available to the audit team for review. Currently the company has some houses which are available to the workers. A visit to houses with number 8,9,10,11 in Kanaiga estate were all provided with toilet and bath per family. During the assessment it was verified that the construction of bathhouse and toilet facilities were in progress.</p>	Complied
6.2.5	<p>The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food.</p> <p>- Minor compliance -</p>	<p>There are markets in the various workers’ villages which is created by nearby communities who bring their food stuffs and other items for sale. There are also government established markets that workers access for their essential goods. The company has also established mini shops for the workers in Sanga Sanga and Mapangu.</p>	Complied

RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

<p>6.2.6</p>	<p>A DLW is paid to all workers, including those on piece rate/quotas, for whom the calculation is based on achievable quotas during regular work hours.</p> <p>- Minor compliance -</p>	<p>Brabanta Certification Unit has established Proposition de calcul de salaire décent / BRABANTA S.A. dated 30/10/2022 which was available for verification.</p> <p>The document is used as reference for calculating methodology of DLW based on the cost of a basic but decent standard of living. Cost estimates and benchmarks in the a particular area were looked at when determining the DLW.</p> <p>Brabanta management conducted assessment on actual average wage calculation of DLW benchmark calculation for Socfin SA was taken into account of Food, housing, medical, transportation, education, unexpected events (5%), total living basket and net living basket.</p> <p>In compliance to the RSPO decent salary calculation formula, Brabanta Management the salary scale for October 2022 has an increase of 10% and an increase is planned of 13% at the end of January 2023. In addition to the salary, employees receive 2.5 litres of palm oil every month, free medical care for themselves and their families according to the regulations in force, an annual bonus is paid to all, family allowances are also paid via the CNSS.</p> <p>It was verified that the higher amount is used to be paid to the worker. In the event that the worker has already surpassed the payment of a DLW, there were no reduction of wage and/or any benefits in kind taken away from worker.</p>	<p>Complied</p>
--------------	------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-----------------

PROCEDURAL NOTE:
 The RSPO Labour Task Force will prepare guidance on the DLW implementation, including details on how to calculate a DLW, expected for 2019. The RSPO Secretariat will endeavour to carry out DLW country benchmarks for palm oil producing countries in which RSPO members operate and for which no Global Living Wage Coalition (GLWC) benchmarks exist.

6.2.7	<p>Permanent, full-time employment is used for all core work performed by the unit of certification. Casual, temporary and day labour is limited to jobs that are temporary or seasonal.</p> <p>- Minor compliance -</p>	<p>The company employs both permanent and contract workers in their operation and all are engaged as full-time employees. Permanent works are workers employed directly by the company while contract workers are labours supplied by third party service provider. These contract workers are employed as piece rate workers and all work as full-time employees. All workers regardless the type of employment receive equal treatment such as contract, salary, leaves and housing benefits. All workers are also entitled to use the health facility which the cost is covered by the organisation. Furthermore, their family members are also entitled to use the health facility.</p>	Complied
<p>Criteria 6.3: The unit of certification respects the rights of all personnel to form and join trade unions of their choice and to bargain collectively. Where the right to freedom of association and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all such personnel.</p>			
6.3.1	<p>(C) A published statement recognising freedom of association and right to collective bargaining in national languages is available and is explained to all workers in languages that they understand, and is demonstrably implemented.</p> <p>- Critical (Major) compliance -</p>	<p>The company has a documented Freedom of Association policy last updated 1st September 2021. The document states that the company supports the rights of workers to associate freely with others, including the right to form and join trade unions for the protection of their interest. During field visit to the factory, administration and three estates, it was observed that the policy has been publicly displayed on notice boards in and around the company. Interview with sampled workers in the Kanaiga, Sanga Sanga and Kadima estate all confirmed the document has been explained to their understanding and all workers belong to one of the four union bodies in the company.</p>	Complied
6.3.2	<p>Minutes of meetings between the unit of certification with trade unions or workers representatives, who are freely elected, are documented in national languages and made available upon request.</p> <p>- Minor compliance -</p>	<p>Management and the union meets three times every year to deliberate on workers’ issues. For all meetings, the company takes and keeps records of all issues discussed at the meeting. Records of the previous meetings was made available for review. Copies reviewed include Minutes of meeting between workers’ union and management on 2nd August 2022. Attendance Workers representatives 8, Management 4.</p>	Complied

		Copies are shared with the workers union.	
6.3.3	Management does not interfere with the formation or operation of registered unions/ labour organisations or associations, or other freely elected representatives for all workers including migrant and contract workers. - Minor compliance -	Brabanta has four local unions representing the workers. They are Action, CSC, UNTC and GS. During interview with all four representatives of the workers they confirmed management does not interfere with the formation or operation of the registered unions.	Complied
Criteria 6.4: Children are not employed or exploited.			
6.4.1	A formal policy for the protection of children, including prohibition of child labour and remediation is in place, and included into service contracts and supplier agreements. - Minor compliance -	The company has a documented child labour policy dated 13 th August 2019. The policy defines Child labour as work that deprives children of their childhood, potential harm and dignity, and which is detrimental to their physical and mental development. Brabanta also complies with all local laws on the minimum employment age and ensures that people under the age of 18 are not employed by the company or by third parties in accordance with the code of the work. A review of sampled third party contracts shows the inclusion of the prohibition of child labour in the agreement. They are <ol style="list-style-type: none"> 1. Societe de Transport et de Logistique du Congo (STLC Sarl) for the transportation of FFB and Fertilizer in for the company. 2. SK Protection for the provision of Security for the company. 	Complied
6.4.2	(C) There is evidence that minimum age requirements are met. Personnel files show that all workers are above the national minimum age or above company policy minimum age, whichever is higher. There is a documented age screening verification procedure. - Critical (Major) compliance -	Interview with the human resource manager indicates for all employment made, the company requires the workers presents an electoral card as proof of age before they are given employment. Also during a visit to the three estates and interview with sampled workers on the plantations and with the representatives of the workers as well as field observation establishes that the company does not engage the services of workers below the national minimum working age which is 18 years. Reviewed of the personnel file of two workers (008062, 008385 and 001332) establishes conformance.	Complied

6.4.3	<p>(C) Young persons may be employed only for non- hazardous work, with protective restrictions in place for that work.</p> <p>- Critical (Major) compliance -</p>	The company does not employ young workers in their operations. Also review of documents and interview with workers did not establish the presence of young workers in the company's operations.	Complied
6.4.4	<p>The unit of certification demonstrates communication about its 'no child labour' policy and the negative effects of child labour, and promotes child protection to supervisors and other key staff, smallholders, FFB suppliers and communities where workers live.</p> <p>- Minor compliance -</p>	The company has a no child labour policy which has been made available to the communities and also posted on all the notice boards of the company. For all third party agreements, has included the prohibition of child labour in all the contracts.	Complied
<p>Criteria 6.5: There is no harassment or abuse in the workplace, and reproductive rights are protected.</p>			
6.5.1	<p>(C) A policy to prevent sexual and all other forms of harassment and violence is implemented and communicated to all levels of the workforce.</p> <p>- Critical (Major) compliance -</p>	The company has a policy against sexual and moral harassment dated 26/02/2017 and approved by the General manager. The policy is displayed on the various notice boards and has also been shared with the various communities. During a field visit and interview with three pest monitoring teams in the Kanaiga estate (Block K10), they demonstrated understanding of the policy and confirmed such acts are not tolerated in the company.	Complied
6.5.2	<p>(C) A policy to protect the reproductive rights of all, especially of women, is implemented and communicated to all levels of the workforce.</p> <p>- Critical (Major) compliance -</p>	The company has a documented policy for the protection of reproductive rights for women dated 22/03/2018 and approved by the General manager. The policy is displayed on the various notice boards and has also been shared with the various communities. The policy has been explained to workers at their morning muster and this was also confirmed during workers' interview. Interview with nine female workers in the Sanga sanga estate confirmed the policy has been explained to their understanding.	Complied
6.5.3	<p>Management has assessed the needs of new mothers, in consultation with the new mothers, and actions are taken to address the needs that have been identified.</p> <p>- Minor compliance -</p>	<p>Brabanta Management is aware of the requirement to assess the needs of new mothers.</p> <p>Document review of Birth Register Record books from April 2022 until December 2022, Brabanta Health Centre have recorded new babies born</p>	Complied

RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

		<p>with acknowledgement from operating unit representatives. The document <i>Statistique Des Femmes Au Niveau De L'hopital De Notre Membre</i> was available for verification which states the statistics of new mothers in the operating unit.</p> <p>Regular Meetings are held with the Gender Committee and woman from the plantations to make them aware that they are entitled to their needs as new mothers. Records of Sensitization were available dated 26/11/2022.</p> <p>Meetings were held with new mothers and breast feeding mothers to assess their needs and address them accordingly. Records of meetings were available dated 08/12/2022. The management have established a documented action plan which was derived from the meeting. The action plan was available for verification.</p> <p>The feedbacks from these were recorded and available for verification. Sampled feedback document from new mother dated 06/12/2022.</p> <p><i>Les Problemes Et Les Solutions Des Femmes Enceinte Et Allaitantes</i> was available for verification which states the problems and solutions for Pregnant and Breastfeeding Woman.</p>	
6.5.4	<p>A grievance mechanism, which respects anonymity and protects complainants where requested, is established, implemented and communicated to all levels of the workforce.</p> <p>- Minor compliance -</p>	<p>The company has a documented procedure captioned Procedure de Gestion des Grievs Internes et Externes (Internal and External Grievance Management Procedure) last updated on the 31/01/2020. The procedure reviewed outlines the guidelines for raising internal grievance from their employees, trade unions or other internal stakeholders. The procedure states that all complaints regarding company operations must be sent to the Chief of Personnel through suggestion boxes placed at vantage points across the plantations. Also at the department copies of the grievance forms have been made available for use.</p> <p>The procedure makes provision for filing anonymous complains and timelines for addressing grievances made</p>	Complied

Criteria 6.6: No forms of forced or trafficked labour are used.			
6.6.1	<p>(C) All work is voluntary and following are prohibited:</p> <ul style="list-style-type: none"> • Retention of identity documents or passports • Payment of recruitment fees • Contract substitution • Involuntary overtime • Lack of freedom of workers to resign • Penalty for termination of employment • Debt bondage • Withholding of wages <p>- Critical (Major) compliance -</p>	<p>Brabanta does not have migrant workers in their operations. Workers interviewed indicated that all works are voluntary and there are no contract substitution. Also all the workers have a collective Bargaining agreement with a service condition that applies to all workers.</p>	Complied
6.6.2	<p>(C) Where temporary or migrant workers are employed, a specific labour policy and procedures are established and implemented.</p> <p>- Critical (Major) compliance -</p>	<p>The company employs temporal workers in their operations and in line with this, Brabanta has a documented special labour policy to respect the temporary and daily workers. The policy is dated 25/11/2015 and approved by the General manager. The policy has been posted on the company notice boards and explained to the workers at their muster. Copies of the policy has also been shared with the communities through their chiefs.</p>	Complied
Criteria 6.7: The unit of certification ensures that the working environment under its control is safe and without undue risk to health.			
6.7.1	<p>(C) The responsible person(s) for H&S is identified. There are records of regular meetings between the responsible person(s) and workers. Concerns of all parties about health, safety and welfare are discussed at these meetings, and any issues raised are recorded.</p> <p>- Critical (Major) compliance -</p>	<p>Brabanta has Identified the HSE Manager as the responsible person for the company's Health Safety and Environment. The appointment was verified from the Manager's Job description (<i>Definition de Fonction</i>) dated and signed by the General Manager on 03/02/2020. A Health and Safety (H&S) Unit was established under the Sustainability Department of the company. The company communicates its Health, Safety And Environment policies, procedures and related issues to workers through weekly toolbox talk. Each week, the HSE Manager choses one</p>	Complied

RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

		department to talk on Health and Safety issues. Company has records of toolbox talks which were reviewed during the audit. Interviews with managers and workers confirmed that during such toolbox talks, workers are able to give their H&S concerns. Records of toolbox talks were available for verification, including the attendance of the workers.	
6.7.2	<p>Accident and emergency procedures are in place and instructions are clearly understood by all workers. Accident procedures are available in the appropriate language of the workforce. Assigned operatives trained in first aid are present in both field and other operations, and first aid equipment is available at worksites. Records of all accidents are kept and periodically reviewed.</p> <p>- Minor compliance -</p>	<p>Accident and emergency procedures are available in the mill and estates and displayed at various locations in the head office, divisional office and mill compound. Workers are trained on the procedures and evacuation and response drills are simulated to prepare the workers for the actual situations.</p> <p>First Aiders were available in the mill and estates. In the estate the first aid boxes were placed with the supervisors of each operations. The <i>Chef d'equipe (supervisor)</i> of each operations has been identified as the First Aider responsible for handling the First Aid Boxes. While for the mill the First Aid box is placed at the respective stations with the Station Head identified as the First Aiders responsible for handling the boxes. All personals responsible for the First Aid Boxes have undergone specific trainings, conducted by the Brabanta Medical Centre. Interview with the sampled First Aiders indicated that they were able to distinguish the items in the first aid boxes and its uses.</p> <p>The Medical Centre of Brabanta maintains the accident records for all accidents and incidents that occur are Brabanta Certification Unit. The records were available for verification. The report itself is updated by the Doctor in-charge. The detailed breakdown of the accidents are stated under indicator 6.7.5 in the report.</p>	Complied
6.7.3	<p>(C) Workers use appropriate personal protective equipment (PPE), which is provided free of charge to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, land preparation, and harvesting. Sanitation facilities for those</p>	<p>Brabanta Certification Unit have ensured all workers are all provided appropriate PPEs with accordance to the job they conduct. During the visit to the Herbicide Applicators, Loose Fruit Pickers, Harvesters and FFB Loaders, it was sighted that the workers were wearing all appropriate required PPEs. Interview with the workers indicated that the</p>	Complied

RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

	<p>applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing.</p> <p>- Critical (Major) compliance -</p>	<p>PPEs were provided free of charge without any deductions to their salary. Sanitisation facilities were available at each division in the estate. Visit to the Sanitisation Facility at Kanangai Estate indicated that the facilities were well maintained and used by the herbicide applicators to clean themselves prior to returning home.</p>																
6.7.4	<p>All workers are provided with medical care and covered by accident insurance. Costs incurred from work-related incidents leading to injury or sickness are covered in accordance with national law or by the unit of certification where national law does not offer protection.</p> <p>- Minor compliance -</p>	<p>Brabanta Certification Unit has its own Medical Health Centre with qualified medical personnel that provide various health care services to workers, spouse and children at no cost. In cases of referrals to major hospitals for severe accidents and injuries and sickness other than work related accidents, the company provides a guarantee letter to the hospital. If the workers are to visit the hospitals by themselves, they are then reimbursed of the hospitalization costs.</p> <p>All workers of Brabanta Certification Unit are covered by accident insurance under National Institute for Social Security. The management makes monthly contribution to the NISS for all its works. Sampled the contribution records for the month of August 2022 and October 2022 available for verification.</p>	Complied															
6.7.5	<p>Occupational injuries are recorded using Lost Time Accident (LTA) metrics.</p> <p>- Minor compliance -</p>	<p>A monthly accident report is maintained by the Brabanta Sustainability Department where they monitor all the accidents that occur in the estates within Brabanta. Monthly Accident Report for 2022 was available for verification as below.</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="text-align: left;">Brabanta Certification Unit</th> <th style="text-align: center;">Total Cases</th> <th style="text-align: center;">Total LTA</th> </tr> </thead> <tbody> <tr> <td>Brabanta POM & Transportation Department</td> <td style="text-align: center;">10</td> <td style="text-align: center;">38</td> </tr> <tr> <td>Sanga Sanga Estate</td> <td style="text-align: center;">3</td> <td style="text-align: center;">20</td> </tr> <tr> <td>Kadima Estate</td> <td style="text-align: center;">9</td> <td style="text-align: center;">32</td> </tr> <tr> <td>Kanangai Estate</td> <td style="text-align: center;">46</td> <td style="text-align: center;">159</td> </tr> </tbody> </table>	Brabanta Certification Unit	Total Cases	Total LTA	Brabanta POM & Transportation Department	10	38	Sanga Sanga Estate	3	20	Kadima Estate	9	32	Kanangai Estate	46	159	Complied
Brabanta Certification Unit	Total Cases	Total LTA																
Brabanta POM & Transportation Department	10	38																
Sanga Sanga Estate	3	20																
Kadima Estate	9	32																
Kanangai Estate	46	159																

Principle 7: Protect the environment, conserve biodiversity and ensure sustainable management of natural resources.			
Criteria 7.1: Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management (IPM) techniques.			
7.1.1	<p>(C) IPM plans are implemented and monitored to ensure effective pest control.</p> <p>- Critical (Major) compliance -</p>	<p>For the management of identified pests such as <i>Coelaenomodera minuta</i>, <i>Oryctes monoceros</i>, rats, birds and <i>Cercospora elaeidis</i>, Brabanta has developed an integrated pest management plan (Plan de Gestion Intégrée des Ravageurs, Document Code GIR, Document Index : 00, revised on 05/07/2021).</p> <p>The IPM provides for different types of actions such as routine field checks and specific field interventions for each identified pest type.</p> <p>Chapter 12 of the IPM plan clearly stipulates that prophylactic use of pesticides in pest control is not a recommended approach at Brabanta. Pesticides are used uniquely for curative treatment.</p>	Complied
7.1.2	<p>Species referenced in the Global Invasive Species Database and CABI.org are not to be used in managed areas, unless plans to prevent and monitor their spread are implemented.</p> <p>- Minor compliance -</p>	<p>No species referenced in Global Invasive Species Database and CABI.org are used in managed areas. This was confirmed based on the interviews with the management, workers and local surrounding communities. Records of pest and disease control also confirmed that there were no use of such species in the managed area.</p>	Complied
7.1.3	<p>There is no use of fire for pest control unless in exceptional circumstances, i.e. where no other effective methods exist, and with prior approval of government authorities. [For NI to define process].</p> <p>- Minor compliance -</p>	<p>Brabanta Certification Unit has a zero-fire use policy. No use of fire was observed at the time of the audit.</p>	Complied
Criteria 7.2: Pesticides are used in ways that do not endanger health of workers, families, communities or the environment.			
7.2.1	<p>(C) Justification of all pesticides used is demonstrated. Selective products and application methods that are specific to the target pest, weed or disease are prioritized.</p> <p>- Critical (Major) compliance -</p>	<p>Brabanta has developed an environmental policy (Politique Environnementale of 22/06/2018) that guides its operations. The policy prescribes an environmental management system aimed at documenting, implementing and reducing the environmental impacts of all Brabanta operations on both the natural and social environment.</p>	Complied

RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

		<p>Additionally, Brabanta has developed a number of procedures for the selective use of products and application methods that are specific to the target pest, weed or disease. Examples include:</p> <ul style="list-style-type: none"> - Procedure for the control and fight against pests: Rhynchophorus (Procédure de Contrôle et Lutte Contre les Ravageurs: Rynchophorus) of 23/08/2019, Document Ref.: CLCR, Index 01. - Procedure for sanitization of Ganoderma (Procédure de la Sanitization du Ganoderma) of 23/08/2019; document Ref. SAGA, Index 01. 	
7.2.2	<p>(C) Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per ha and number of applications) are provided.</p> <p>- Critical (Major) compliance -</p>	<p>Records of pesticides (including active ingredients used and their amount of active ingredient applied per hectare and number of applications) are kept, at the level of Departmental Stores, the Main Chemical Storage Facility and at the Agronomy Department. The records for 2022 were viewed during the audit.</p>	Complied
7.2.3	<p>(C) Any use of pesticides is minimised as part of a plan, eliminated where possible, in accordance with IPM plans.</p> <p>- Critical (Major) compliance -</p>	<p>As part of the pesticides reduction plan, Brabanta Certification Unit has developed an Integrated Pest Management Plan (<i>Plan de Gestion Integree des Ravageurs</i>, Documents Code GIR, Document Index 00, revised on 05/07/2021). This plan sets critical limits to determine the use of pesticides.</p> <p>For each identified pest type, the IPM outlines a management strategy for routine and special control measures.</p> <p>The plan prioritizes physical elimination over chemical usage e.g., for Rodents and Ganoderma. Additionally, mechanical traps are used as part of the IPM plan.</p>	Complied
7.2.4	<p>There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in national best.</p> <p>- Minor compliance -</p>	<p>Brabanta has developed an integrated pest management plan (<i>Plan de Gestion Integree des Ravageurs</i>, Documents Code GIR, Document Index 00, revised On 05/07/2021) for the management of identified pest categories such as <i>Coelaenomoderata minuta</i>, <i>Oryctes monoceros</i>, rats, birds and <i>Cercospora elaeidis</i>.</p>	Complied

		Chapter 12 of the IPM plan clearly stipulates that prophylactic use of pesticides in pest control is not a recommended approach at Brabanta. Pesticides are used uniquely for curative treatment.	
7.2.5	<p>Pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat, are not used, unless in exceptional circumstances, as validated by a due diligence process, or when authorised by government authorities for pest outbreaks.</p> <p>The due diligence refers to:</p> <ul style="list-style-type: none"> - Minor compliance - <p>7.2.5a Judgment of the threat and verify why this is a major threat</p> <p>7.2.5b Why there is no other alternative which can be used</p> <p>7.2.5c Which process was applied to verify why there is no other less hazardous alternative</p> <p>7.2.5d What is the process to limit the negative impacts of the application</p> <p>7.2.5e Estimation of the timescale of the application and steps taken to limit application to the specific outbreak.</p>	Brabanta Certification Unit maintains a Chemical Register where all the chemical used in the mill and estates are identified and documented. As of to date the certification unit does not use chemicals that are high toxicity or chemicals that are classified in the World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat within their operations.	Complied
7.2.6	<p>(C) Pesticides are only handled, used or applied by persons who have completed the necessary training and are always applied in accordance with the product label. All precautions attached to the products are properly observed, applied, and understood by workers (see Criterion 3.6). Personnel applying pesticides must show evidence of regular updates on the knowledge about the activity they carry out.</p> <ul style="list-style-type: none"> - Critical (Major) compliance - 	<p>Pesticide operators are given training on the safe handling and application of the pesticides. Suitable personal protective equipment's and application equipment provided to the operators based on the PPE issuance forms.</p> <p>The Head of HSE for Brabanta has conducted regular trainings on chemical handling for the Estate Management Teams. The most recent training was documented and verified dated 10/12/2022. The Head of each Estate Management Team in return conduct daily briefing and training to their chemicals handlers and sprayers at the respective</p>	Complied

RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

		<p>estates. Sampled the records of Training dated 05/04/2022 for Sanga Sanga Estate.</p> <p>The Head of HSE for Brabanta also conducts training on Chemical Store Management. The latest training was recorded and verified dated 10/12/2022.</p>	
7.2.7	<p>(C) Storage of all pesticides is in accordance with recognised best practices.</p> <p>- Critical (Major) compliance -</p>	<p>Brabanta has developed a procedure to guide the storage of chemicals, including pesticides (<i>Procedure de Stockage des Produits Chimiques</i>, Code STPC of 25/08/2015)</p> <p>HSE has developed a checklist for the monitoring of storage zones for pesticides (STPC/FOR1: Checklist). The checklist encompasses issues of safety, security, proper aeration, inventories and PPE in and around the storage zones. A monthly action plan for the monitoring of storage areas has been developed by the unit of certification and implemented accordingly.</p>	Complied
7.2.8	<p>All pesticide containers are properly disposed of and/or handled responsibly if used for other purposes.</p> <p>- Minor compliance -</p>	<p>Brabanta Certification Unit has developed a Waste Management Policy that includes management of pesticide containers (<i>Procedure de Gestion des Dechets</i>, Code: GDD, Index: 00 of 15/10/2015). This procedure includes a Checklist for tracking different types of waste including pesticide containers (GDD/FOR1: <i>Check Liste Gestion des Dechets</i>).</p> <p>The procedure classifies waste types, handling/storage methods, associated risks, and PPE required by personnel in the waste storage areas.</p> <p>Storage sites for pesticide containers and other waste types were visited during the audit and found to be adequate. Additionally, interviews with staffs at the waste storage site confirmed that they are properly trained to carry out their activities. An inventory of the waste that enters the storage site is kept on a daily basis. For this, Brabanta has developed a separate policy for the management of the waste storage site (<i>Gestion de la Dechetterie Interne, GDI</i>) of 23/04/2020. This procedure lays down the framework for handling and storage of waste, including pesticide</p>	Complied

RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

		containers at the different waste storage sites within Brabanta Certification Unit. Records of waste inventory was available for verification.	
7.2.9	<p>(C) Aerial spraying of pesticides is prohibited, unless in exceptional circumstances where no other viable alternatives are available. This requires prior government authority approval. All relevant information is provided to affected local communities at least 48 hours prior to application of aerial spraying.</p> <p>- Critical (Major) compliance -</p>	No aerial spraying is practiced across the entire unit of certification.	Complied
7.2.10	<p>(C) Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated.</p> <p>- Critical (Major) compliance -</p>	<p>Specific annual medical surveillance for chemical operators is conducted annually by the medical unit of Brabanta.</p> <p>Before a new worker begins with chemical related activity, a baseline sampling is conducted. Samples collected include blood, faeces, urine for testing, meanwhile other parameters such as weight are equally taken. The workers are then subjected to annual surveillance to control these values over time. If results show that they may be of concern, a memo will be sent to the head of the operating unit to remove the particular worker from chemical related works.</p> <p>Records for the last annual medical surveillance for chemical operators were consulted at the Brabanta medical unit. Interviews with these individuals confirmed that they have undergone annual medical surveillance at the Brabanta Health Unit.</p>	Complied
7.2.11	<p>(C) No work with pesticides is undertaken by persons under the age of 18, pregnant or breastfeeding women or other people that have medical restrictions and they are offered alternative equivalent work.</p> <p>- Critical (Major) compliance -</p>	Brabanta Sa has established the <i>Politique De Protection De Droit A La Reproduction Chez Femme</i> (Female Reproductive Rights Protection Policy) dated 22/03/2018 which forbids woman who are pregnant or breast feeding to work with chemical related works. Currently, Brabanta Certification Unit does not engage any females to be involved with chemical related works. Brabanta Certification Unit does not employ any workers below the age of 18.	Complied

Criteria 7.3: Waste is reduced, recycled, reused and disposed of in an environmentally and socially responsible manner.			
7.3.1	<p>A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented.</p> <p>- Minor compliance -</p>	<p>Brabanta has developed a waste management procedure (Procédure de Gestion des Déchets, Code: GDD, Index: 00 of 15/10/2015). This procedure includes a Checklist for tracking different types of waste (GDD/FOR1: Check Liste Gestion des Déchets). Management options detailed in the plan include prevention, reuse, recycling (composting for organic waste), energy recovery through methanation, incineration.</p> <p>The procedure equally highlights waste separation (according to source and toxicity), collection and transportation to waste storage areas. Different waste types (scrap metals, household waste, empty pesticide containers, etc. are collected, transported and stored according to these separate categories.</p> <p>Metal waste and plastic waste are collected and stored for onward recycling.</p> <p>Biomedical wastes from the medical facility are stored in secured designated areas for onward elimination at a specially designed incinerator onsite.</p> <p>Chemical waste, including empty pesticide containers are collected and stored at a designated chemical waste storage site.</p> <p>Interviews with staffs at the waste storage site revealed that they are properly trained to manage the site. Additionally, a register of all the waste that enter the site is kept on a daily basis. For this, Brabanta has developed a separate policy for the management of the waste storage site (Gestion de la Déchetterie Interne, GDI) of 23/04/2020 to guide all actions within the waste storage site.</p> <p>Meanwhile, effluent emanating from mill activity is collected and treated through a system of lagoons and the end product stored in designated lagoon with any release into the natural environment.</p>	Complied

7.3.2	<p>Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.</p> <p>- Minor compliance -</p>	<p>Brabanta convenes 4 meetings every month to sensitize its workforce on waste management (Minutes HSE). Reports for the HSE meetings about waste management of November and December 2022, including attendance sheets were reviewed at the time of the audit. The theme of the HSE meetings included management of wastes in camps, and waste segregation.</p> <p>The waste management procedure previously cited outlines different waste management options for the different types of waste produced.</p> <p>Visits to camps' waste collection points (Sanga Sanga and Kadima) confirmed that Brabanta's waste management plan is being respected.</p>	Complied
7.3.3	<p>The unit of certification does not use open fire for waste disposal.</p> <p>- Minor compliance -</p>	<p>Field observations revealed that the unit of certification does use open fire for waste disposal.</p> <p>Additionally, Brabanta has developed a policy to manage fires (Procedure de Lutte Anti-incendie, Code: PAI, of 01/12/2015), that helps to track and manage all fire incidents within the unit of certification.</p>	Complied
Criteria 7.4: Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.			
7.4.1	<p>Good agriculture practices, as contained in SOPs, are followed to manage soil fertility to optimise yield and minimise environmental impacts.</p> <p>- Minor compliance -</p>	<p>Brabanta has developed a series of SOPs on good agricultural practices to manage soil fertility and to optimize yields and minimise environmental impacts.</p> <p>These include:</p> <ul style="list-style-type: none"> • Procedure for Chemical weeding (Procedure de desherbage Chimique des Ronds, Document Code: DCR, of 23 August 2019) • Procedure for Palm Fertilization (Procedure de fertilization de Palmier a Huile, Document Code: FPH, Version 01, of 31/08/2019) • Procedure for harvesting (Procedure de Prevision de la Recolte, Code: PRE, Version 01 of 23/08/2019) • Procedure for Pruning (Procedure d'Elargage Palmiers a Huile, Code: EPH of 05/04/2019). 	Complied

RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

		<ul style="list-style-type: none"> Procedure for plantation maintenance (Procédure d’Instruction et Control des Operations d’Entretien en Plantation, Code: ICOE, of 23/08/2019) <p>Implementation of these procedures was evidenced by different field and activity reports seen during the audit.</p>	
7.4.2	<p>Periodic tissue and soil sampling is carried out to monitor and manage changes in soil fertility and plant health.</p> <p>- Minor compliance -</p>	<p>To monitor and manage changes in soil fertility and plant health, periodic soil and tissue sampling is carried out by Brabanta. Interviews with staff of the agronomic department revealed that soil analyses are done every 2 years, while tissue analyses are done every year.</p> <p>The report of annual tissue sampling for 2021 (Campagne de Diagnostic Foliaire Palmier (2021), Plantation Brabanta, Rapport Annexe), was seen during the time of the audit. The results of the sampling are used in determining the quantities of fertilizers applied.</p>	Complied
7.4.3	<p>A nutrient recycling strategy is in place, which includes the recycling of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), palm residues and optimal use of inorganic fertilisers.</p> <p>- Minor compliance -</p>	<p>A nutrient recycling strategy that includes use of EFB, is in place. Records of EFB application in fields to compensate for organic fertilization were seen during the time of the audit.</p> <p>These records are kept on a monthly basis as evidenced by the Monthly Fertilizer Data (Rapport Mensuel SSE 2022 – 6 – Produits Phytosanitaires et Fertilisants, created on 01/08/2018 and revised on 31/01/2022). The report covers the period spanning from January to December 2022. According to this report, a total of 1,703 tons of EFB were applied in 2022, while 2,883.2 tons of fiber were used in 2022.</p> <p>During the site visit to Kanangai Estate, the EFB application was observed and confirmed to tally with the records that were shown.</p>	Complied
7.4.4	<p>Records of fertiliser inputs are maintained.</p> <p>- Minor compliance -</p>	<p>There exists an Annual Fertilizer Plan. The plan for 2022 was seen at the time of the audit (Consommation Agro 2022), and includes quantities and types of fertilizers applied per division of the plantation, the active ingredient, among other things. The quantities of fertilizer applied and recorded are based on the results of the tissue and soil analyses.</p>	Complied

Criteria 7.5: Practices minimise and control erosion and degradation of soils.			
7.5.1	<p>(C) Maps identifying marginal and fragile soils, including steep terrain, are available.</p> <p>- Critical (Major) compliance -</p>	<p>Maps identifying soils and topographic maps are available and were seen during the audit as evidenced by Brabanta Regional Soil Map (Brabanta_Regional_Soil_Map_HWSD_v1.21), conducted by Programme de Cartographie.</p> <p>Additionally, the HCV Assessment (HCV assessments for the SOCFIN Brabanta Oil Palm Plantation in Mapangu, Democratic Republic of Congo, Final Version of May 2020) assessed soils in the Brabanta concession.</p>	Complied
7.5.2	<p>There is no extensive replanting of oil palm on steep terrain.</p>	<p>According to the HCV assessment conducted, only slopes of 20% were identified in the Brabanta concession. The steep slope analysis conducted based on Digital Elevation Model (DEM) revealed that the slope of Brabanta concession varies from 0 to 20 degree and that nowhere within the concession boundaries has a slope greater than 20 degrees been identified.</p> <p>According to the Socfin Oil Palm Manual: Norms and Procedures, Version 1 of 2016 planting is only carried out in areas of inclination of less than 20%. Therefore, there was no planting of oil palm on steep terrain as observed during field visit to the estates.</p> <p>The Socfin Oil Palm Manual: Norms and Procedures, Version 1 of 2016 prescribes agricultural practices company-wide.</p> <p>Specifically, Section 4 on Plantation Design defines the planting design to be used at different inclinations. E.g. from 19-40% terracing is required while for 9-19% use of individual platforms is recommended.</p>	Complied
7.5.3	<p>There is no new planting of oil palm on steep terrain.</p> <p>- Minor compliance -</p>	<p>No steep terrain was identified in the Brabanta concession, hence there is no extensive planting on steep terrain.</p>	Complied
Criteria 7.6: Soil surveys and topographic information are used for site planning in the establishment of new plantings, and the results are incorporated into plans and operations.			

RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

7.6.1	<p>(C) To demonstrate the long-term suitability of land for palm oil cultivation, soil maps or soil surveys identifying marginal and fragile soils, including steep terrain, are taken into account in plans and operations.</p> <p>- Critical (Major) compliance -</p>	<p>As part of the HCV Assessment (HCV assessments for the SOCFIN Brabanta Oil Palm Plantation in Mapangu, Democratic Republic of Congo, Final Version of May 2020), soils assessments were done in the Brabanta concession.</p> <p>According to this HCV assessment, the soil in the plantation area is predominantly sandy clay loam with sand dominating the entire texture. However, the risk of critical soil erosion due to steep slopes in the plantation appears relatively low as a result of the low-lying and generally flat topography in most of the plantation.</p> <p>Aspects covered include topography and drainage, geology and geomorphology, and climate. The study led to the production of soil maps.</p>	Complied
7.6.2	<p>Extensive planting on marginal and fragile soils, is avoided, or, if necessary, done in accordance with the soil management plan for best practices.</p> <p>- Minor compliance -</p>	<p>There is no extensive planting on marginal or fragile soils. Moreover, and in and in accordance with the Socfin Oil Palm Manual: Norms and Procedures, Version 1 of 2016, terraces have been established at places deemed to be steep slopes to avoid and control erosion.</p>	Complied
7.6.3	<p>Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure.</p> <p>- Minor compliance -</p>	<p>Based on the Brabanta soil survey, topographic information is used to guide all road maintenance activities as evidenced in Roads Map. Brabanta's road maintenance program includes grading and compacting and construction of gutters to prevent erosion.</p>	Complied
<p>Criteria 7.7: No new planting on peat, regardless of depth after 15 November 2018 and all peatlands are managed responsibly.</p>			
7.7.1	<p>(C) There is no new planting on peat regardless of depth after 15 November 2018 in existing and new development areas.</p> <p>- Critical (Major) compliance -</p>	<p>The HCV Assessment (HCV assessments for the SOCFIN Brabanta Oil Palm Plantation in Mapangu, Democratic Republic of Congo, Final Version of May 2020), indicates the occurrence of peat in the adjacent Kasai River and very limited occurrence (ca 1.5 ha) in parts of the Brabanta concession. No planting was done in these areas.</p> <p>Moreover, no replanting was done at Brabanta after 15 November 2018.</p>	Complied

RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

7.7.2	<p>Areas of peat within the managed areas are inventoried, documented and reported (effective from 15 November 2018) to RSPO Secretariat.</p> <p>- Minor compliance -</p>	<p>The HCV assessment revealed that, while no detailed field assessment has been done, review of available data indicates the occurrence of peat in the adjacent Kasai River and very limited occurrence (ca 1.5 ha) in parts of the Brabanta concession.</p>	Complied
<p>PROCEDURAL NOTE: Maps and other documentation of peat soils are provided, prepared and shared in line with RSPO Peatland Working Group (PLWG) audit guidance (see Procedural Note for 7.7.5 below).</p>			
7.7.3	<p>(C) Subsidence of peat is monitored, documented and minimised.</p> <p>- Critical (Major) compliance -</p>	<p>No peat soil identified at all estates within Brabanta Certification Unit. Verified there is no new planting activity in the estates as well. Hence, this criteria is not applicable.</p>	Not Applicable
7.7.4	<p>(C) A documented water and ground cover management programme is in place.</p> <p>- Critical (Major) compliance -</p>	<p>No peat soil identified at all estates within Brabanta Certification Unit. Verified there is no new planting activity in the estates as well. Hence, this criteria is not applicable.</p>	Not Applicable
7.7.5	<p>(C) For plantations planted on peat, drainability assessments are conducted following the RSPO Drainability Assessment Procedure, or other RSPO recognised methods, at least five years prior to replanting. The assessment result is used to set the timeframe for future replanting, as well as for phasing out of oil palm cultivation at least 40 years, or two cycles, whichever is greater, before reaching the natural gravity drainability limit for peat. When oil palm is phased out, it is replaced with crops suitable for a higher water table (paludiculture) or rehabilitated with natural vegetation.</p> <p>- Critical (Major) compliance -</p>	<p>No peat soil identified at all estates within Brabanta Certification Unit. Verified there is no new planting activity in the estates as well. Hence, this criteria is not applicable.</p>	Not Applicable
<p>PROCEDURAL NOTE: Full details of the RSPO Drainability Assessment Guidelines and related concepts and detailed actions are in the manual currently being fine-tuned/tested by PLWG. A final version should be approved by PLWG in January 2019 and will include additional guidance on the steps to be followed after the decision not to replant as well as implications for other stakeholders, smallholders, local communities and the unit of certification. It is recommended that a further twelve-month methodology trial period is proposed for all related management units (i.e. those with plantations on peat) to utilise the methodology and provide feedback to the PLWG to enable further refinement of procedure as appropriate before January 2020. Units of certification have the option to defer replanting till after the availability of the revised guidelines. Additional guidance on alternative crops and rehabilitation of natural vegetation will be provided by PLWG.</p>			

PROCEDURAL NOTE:			
PLWG and the Smallholder Interim Group (SHIG) will collaboratively develop guidance for Independent Smallholders [cross links to SHIG and GHG issues].			
7.7.6	<p>(C) All existing plantings on peat are managed according to the RSPO Manual on Best Management Practices (BMPs) for existing oil palm cultivation on peat', version 2 (2018) and associated audit guidance.</p> <p>- Critical (Major) compliance -</p>	<p>No peat soil identified at all estates within Brabanta Certification Unit. Verified there is no new planting activity in the estates as well. Hence, this criteria is not applicable.</p>	Not Applicable
7.7.7	<p>(C) All areas of unplanted and set-aside peatlands in the managed area (regardless of depth) are protected as "peatland conservation areas"; new drainage, road building and power lines by the unit of certification on peat soils is prohibited; peatlands are managed in accordance with the 'RSPO BMPs for Management and Rehabilitation of Natural Vegetation Associated with Oil Palm Cultivation on Peat', version 2 (2018) and associated audit guidance.</p> <p>- Critical (Major) compliance -</p>	<p>No peat soil identified at all estates within Brabanta Certification Unit. Verified there is no new planting activity in the estates as well. Hence, this criteria is not applicable.</p>	Not Applicable
Criteria 7.8: Practices maintain the quality and availability of surface and groundwater.			
7.8.1	<p>A water management plan is in place and implemented to promote more efficient use and continued availability of water sources and to avoid negative impacts on other users in the catchment. The plan addresses the following:</p> <p>- Minor compliance -</p> <p>7.8.1a The unit of certification does not restrict access to clean water or contribute to pollution of water used by communities.</p>	<p>Brabanta has developed a water management plan (Plan de Gestion d'Eau, PGE) of July 2020. The water management plan addresses all water used by Brabanta including for milling, and in all housing units, in view of promoting more efficient use and to avoid negative impacts on other users in the catchment. The major objectives set out in the water management plan include:</p> <ol style="list-style-type: none"> a. Reduce water use from all Brabanta operations including households b. Control pollution from waste water from Brabanta operations c. Protect watercourses from pollution resulting from Brabanta plantations d. Protect soils from erosion and degradation. 	Complied

**RSPO P&C Public Summary Report
Revision 14 (Aug 2022)**

		<p>Brabanta does not restrict access to clean water or contribute to pollution of water used by communities. To ensure this, Brabanta conducts regular water analysis on all riparian water bodies/streams. A sample is collected upstream and downstream on each river and tested to determine possible impacts by Brabanta activities. The reports of water analysis for the month of December 2022 were seen during the audit. The report with reference: ESP/VD/DIR/MK/1851/NM/2022 of 29th December 2022, and conducted by Ecole de Sante Publique, University of Kinshasa. Both microbiological and physico-chemical analyses were conducted on the water samples. For instance:</p> <ul style="list-style-type: none"> - Sample No. 5: Kasai River (downstream) - Sample No. 7: Lumbunji River (upstream) - Sample No. 8: Lumbunji River (downstream) <p>Samples were collected on 15 December 2022 and analysis commenced on 22 December 2022.</p> <p>Additionally, to ensure that neighboring communities have adequate access to portable water, Brabanta has constructed water collection points along some rivers/streams for use by local communities. Water samples are equally collected from these water collection points and tested as evidenced by:</p> <ul style="list-style-type: none"> - Sample No. 9: Nkanga - Sample No. 10: Mwandumba - Sample No. 13: Sanga Sanga - Sample No. 16: Mission Catholique <p>All samples showed zero presence of coliforms and hence safe for drinking.</p>	
	<p>7.8.1b Workers have adequate access to clean water.</p>	<p>As mentioned above, workers have adequate access to clean water through as system of water points developed by Brabanta. The water points have been provided for riparian village communities and for</p>	

RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

		<p>workers who live in those communities. Additionally, Brabanta has constructed boreholes and equally supplies water with the use of water tanks to some residential areas and workers' camps.</p> <p>The water provided through tanks is equally subject to bacteriological and physico-chemical analysis to ensure that it is safe for drinking and home use as evidenced by:</p> <ul style="list-style-type: none"> - Sample No. 20: Camp Kabila - Sample No. 22: Hospital - Sample No. 24: Shanga <p>All the samples were proven to be safe for home use and drinking.</p>	
7.8.2	<p>(C) Water courses and wetlands are protected, including maintaining and restoring appropriate riparian and other buffer zones in line with 'RSPO Manual on BMPs for the management and rehabilitation of riparian reserves' (April 2017).</p> <p>- Critical (Major) compliance -</p>	<p>Brabanta monitors buffer zones as part of its HCV monitoring activities (Plan d'Action – Zone HVC, dated May 2020). This is done as part of the measures to the maintain and restore appropriate riparian and other buffer zones.</p> <p>According to the HCV management plan, measures include: sensitization of workforce and local populations; sustainable management of swamps, identification and delineation of buffer zones.</p> <p>Additionally, according to Brabanta Water Management Plan previously cited, other actions aimed protecting water courses include:</p> <ol style="list-style-type: none"> a. Planting and maintaining cover crops to slow down erosion and siltation b. Use of EFB in plantations to slow down runoff from heavy rains 	Complied
7.8.3	<p>Mill effluent is treated to be in compliance with national regulations. Discharge quality of mill effluent, especially Biochemical Oxygen Demand (BOD), is regularly monitored.</p> <p>- Minor compliance -</p>	<p>For the treatment of its mill effluent, the unit of certification has constructed a system made of 5 lagoons (1 for cooling, 2 for anaerobic digestion, and 2 for aerobic digestion) and one treated-effluent retention basin.</p> <p>Field visits to the effluent retention/storage basin at the end of the lagoon system revealed that the retention basin has been completely</p>	Complied

RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

		reconstructed to seal all leakages and prevent any escape of liquid from the basin. Therefore, there is no discharge of effluent into any water bodies.	
7.8.4	Mill water use per tonne of FFB is monitored and recorded. - Minor compliance -	Brabanta monitors and records mill water use per tonne of FFB. Data is collected on a daily basis and summarised into monthly reports. Mill water usage data were reviewed during the audit and the average mill water use per tonne of FFB for the year 2022 is 2.90 .	Complied
Criteria 7.9: Efficiency of fossil fuel use and the use of renewable energy is optimised			
7.9.1	A plan for improving efficiency of the use of fossil fuels and to optimize renewable energy is in place, monitored and reported. - Minor compliance -	<p>As a means to improving efficiency of the use of fossil fuels, Brabanta has developed an action plan for the reduction of use of fossil fuels (Plan d'Actions pour la Reduction de l'Utilisation des Energies Fossiles, with document Ref.: PREF, Index 00, of 23/07/2021).</p> <p>Brabanta is located in an enclave without access to the national electricity grid, and hence depends solely on generators to power its mill and provide energy to offices and housing units.</p> <p>To reduce use of generator fuel, Brabanta has put in a place a schedule for energy provision to housing units. This entails providing energy when it is absolutely required and switching off as required. For instance, power is supplied in the mornings to permit workers prepare for work and children for school, after which power is cut. As a rule power is also cut after 10 p.m. until 6 a.m. in the morning.</p> <p>Other means used to reduce fossil fuel use include, providing fuel quotas for different vehicles/departments, regular maintenance of vehicles/machines, tractors and trucks to improve their efficiency. Monthly reports were seen during the audit.</p> <p>Additionally, Brabanta plans to install solar lamps.</p>	Complied
Criteria 7.10: Plans to reduce pollution and emissions, including greenhouse gases (GHG), are developed, implemented and monitored and new developments are designed to minimise GHG emissions.			

RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

7.10.1	<p>(C) GHG emissions are identified and assessed for the unit of certification. Plans to reduce or minimize them are implemented, monitored through the Palm GHG calculator and publicly reported.</p> <p>- Critical (Major) compliance -</p>	<p>Brabanta has identified all its GHG sources and reports them publicly through Palm GHG. The 2021 Summary was seen at the time of the audit. The summary includes, summary emissions, mill emission credits, estate/plantation field emissions and sinks (own, group and 3rd party). Brabanta has developed a plan for the management of GHG (Plan de Gestion de Gaz a Effet de Serre, Reference: PGGES, of 10 September 2022), and actions taken to reduce GHG emissions include, implementation of quotas for use of vehicle fuels, and regular control/maintenance of vehicle engines to ensure efficiency.</p> <p>All these actions are documented through Brabanta HSE Monthly Reporting, Reporting POM & RSPO and Reporting workshop.</p>	Complied
7.10.2	<p>(C) Starting 2014, the carbon stock of the proposed development area and major potential sources of emissions that may result directly from the development are estimated and a plan to minimize them prepared and implemented (following the RSPO GHG Assessment Procedure for New Development).</p> <p>- Critical (Major) compliance -</p>	<p>There have been no new developments within the unit of certification since 2014.</p>	Not Applicable
7.10.3	<p>(C) Other significant pollutants are identified and plans to reduce or minimize them implemented and monitored.</p> <p>- Critical (Major) compliance -</p>	<p>As mentioned in 7.10.1 above, Brabanta GHG calculation captures all significant pollutants. All significant pollutants, including POME, have been identified and plans to minimise them are implemented as part of Brabanta GHG Management Plan.</p>	Complied
Criteria 7.11: Fire is not used for preparing land and is prevented in the managed area.			
7.11.1	<p>(C) Land for new planting or replanting is not prepared by burning.</p> <p>- Critical (Major) compliance -</p>	<p>Socfin SA has developed a policy on responsible management (Politique de Gestion Responsable du Groupe Socfin, revision of 30th March 2022). More specifically, section 5.1 of this policy forbids the use of fire in all operations of Socfin and her affiliates.</p> <p>Brabanta therefore implements a zero-fire use policy and there is no use of fire in land preparation, as evidenced through field visits.</p>	Complied

RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

7.11.2	The unit of certification establishes fire prevention and control measures for the areas directly managed by the unit of certification. - Minor compliance -	Brabanta has developed a procedure to monitor and control fires for the areas they directly manage (Procedure de Lutte Anti-Incendie, Code: LAI, Version 00 of 01/12/2015), that describes prevention and control measures to be taken in case of a fire outbreak in all its operations including in the plantation.	Complied
7.11.3	The unit of certification engages with adjacent stakeholders on fire prevention and control measures. - Minor compliance -	Brabanta carries out sensitization campaigns within neighboring communities on zero fire use. This is done through the community liaison unit (Service De Liaison Communautaires), which relays with local communities and sensitizes them on use of fire and conducts sensitization on combating fires. Reviewed minutes of meetings with communities on the Fight Against Fires, included: <ul style="list-style-type: none"> a. Mwatshingembo: 0(6/08/2022), and b. Mwandumba (07/08/2022). The content discussed during the meeting included use of fire in savannah areas, fishing and hunting practices, and income generating activities.	Complied

Criteria 7.12: Land clearing does not cause deforestation or damage any area required to protect or enhance High Conservation Values (HCVs) or High Carbon Stock (HCS) forest. HCVs and HCS forests in the managed area are identified and protected or enhanced.

PROCEDURAL NOTE for 7.12:

The 2018 RSPO P&C include new requirements to ensure the effective contribution of RSPO to halting deforestation. This will be achieved by incorporating the High Carbon Stock Approach (HCSA) Toolkit in the revised standard.

The RSPO ToC also commits RSPO to balancing sustainable livelihoods and poverty reduction with the need to conserve, protect and enhance ecosystems.

High Forest Cover Countries (HFCCs) urgently require economic opportunities that enable communities to choose their own development path, while providing socio-economic benefits and safeguards.

Adapted procedures will be developed to support the sustainable development of palm oil by indigenous peoples and local communities with legal or customary rights. These will apply in specific HFCCs, and within those, in High Forest Cover Landscapes (HFCLs).

RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

<p>The development of these procedures will be guided by a No Deforestation Joint Steering Group (NDJSG) of RSPO and HCSA members. In HFCCs, RSPO will work through national and local participatory processes with governments, communities and other stakeholders to develop these procedures. A timeframe for these activities is stipulated in the Terms of Reference for the NDJSG and publicly available.</p>			
<p>7.12.1</p>	<p>(C) Land clearing since November 2005 has not damaged primary forest or any area required to protect or enhance HCVs. Land clearing since 15 November 2018 has not damaged HCVs or HCS forests.</p> <p>A historic Land Use Change Analysis (LUCA) is conducted prior to any new land clearing, in accordance with the RSPO LUCA guidance document.</p> <p>- Critical (Major) compliance -</p>	<p>Brabanta has not undertaken new land clearing since November 2005. The Brabanta Oil Palm Plantation is a replanting of an old oil palm plantation that was established in 1911 by Unilever. The replanting by Brabanta began in 2009, with a phased planting of the various blocks of the plantation until 2014.</p>	<p>Complied</p>
<p>7.12.2</p>	<p>(C) HCVs, HCS forests and other conservation areas are identified as follows:</p> <p>- Critical (Major) compliance -</p> <p>7.12.2a For existing plantations with an HCV assessment conducted by an RSPO-approved assessor and no new land clearing after 15 November 2018, the current HCV assessment of those plantations remains valid.</p> <p>7.12.2 b: Any new land clearing (in existing plantations or new plantings) after 15 November 2018 is preceded by an HCV-HCS assessment, using the HCSA Toolkit and the HCV-HCSA Assessment Manual. This will include stakeholder consultation and take into account wider landscape-level considerations.</p>	<p>Brabanta has not carried out any new land clearing after 15 November 2018. However, Brabanta commissioned an HCVs assessment with report titled: HCV Assessment (HCV assessments for the SOCFIN Brabanta Oil Palm Plantation in Mapangu, Democratic Republic of Congo, Final Version of May 2020. The assessment was conducted by Proforest.</p> <p>The Brabanta Oil Palm Plantation is a replant of an old plantation that was established in 1911 by Unilever. The replanting began in 2007, with a phased planting of the various blocks of the plantation.</p> <p>No new land clearing was carried out in the existing plantation. However, Brabanta carried out an HCV Assessment (HCV assessments for the SOCFIN Brabanta Oil Palm Plantation in Mapangu, Democratic Republic of Congo, Final Version of May 2020), was conducted by Proforest, with Armand Yevide as Lead Assessor.</p>	<p>Complied</p>
<p>PROCEDURAL NOTE for 7.12.2: For details of transitional measures, refer to Annex 5: RSPO transition from HCV assessments to HCV-HCSA assessments.</p>			

RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

7.12.3	<p>(C) In High Forest Cover Landscapes (HFCLs) within HFCCs, a specific procedure will apply for legacy cases and development by indigenous peoples and local communities with legal or customary rights, taking into consideration regional and national multi-stakeholder processes. Until this procedure is developed and endorsed, 7.12.2 applies.</p> <p>- Critical (Major) compliance -</p>	<p>The landscape surrounding Brabanta SA is naturally a Savannah area. This was confirmed during the site visit to the plantation. Thus, Brabanta is not in a In High Forest Cover Landscapes (HFCLs) area.</p>	<p>Not Applicable</p>
<p>PROCEDURAL NOTE for 7.12.3: There should be demonstrable benefits to the local community; clear recognition of legal and customary lands based on participatory land use planning; development should be proportional to the needs of the local community; with a balance between conservation and development. This procedure will also cover planting on previous or abandoned agricultural land / plantations. All other P&C requirements apply, including FPIC and HCV requirements.</p>			
7.12.4	<p>(C) Where HCVs, HCS forests after 15 November 2018, peatland and other conservation areas have been identified, they are protected and/or enhanced. An integrated management plan to protect and/or enhance HCVs, HCS forests, peatland and other conservation areas is developed, implemented and adapted where necessary, and contains monitoring requirements. The integrated management plan is reviewed at least once every five years. The integrated management plan is developed in consultation with relevant stakeholders and includes the directly managed area and any relevant wider landscape level considerations (where these are identified).</p> <p>- Critical (Major) compliance -</p>	<p>No new planting has been carried out in the Brabanta concession since 15 November, 2018. The current developed area is a replanting and an HCV Assessment was conducted. Additionally, as part of the HCV Assessment, management and monitoring recommendations were made by Proforest (Chapter 7). Based on this, Brabanta has developed management and monitoring plans for all the HCVs identified in its concession. The management and monitoring plan was viewed at during the audit.</p> <p>Management actions include demarcation of HCVs in collaboration with local communities, sensitization of riparian local communities. Meanwhile, monitoring activities include participatory actions with local communities to identify and report incidents such as bushfires, etc.</p> <p>Minutes of meetings on laws and regulations on customary user rights, (held on 17/06/2022) was seen during the audit.</p> <p>Moreover, the monitoring activities are captured in the HSE Monthly reports.</p>	<p>Complied</p>
7.12.5	<p>Where rights of local communities have been identified in HCV areas, HCS forest after 15 November 2018, peatland and other conservation areas, there is no reduction of these rights without evidence of a negotiated</p>	<p>The Brabanta HCV assessment previously cited identified social HCVs including HCV 5 and 6 and these have been documented accordingly. It was clear from the assessment report that the HCV assessment team carried out consultations with the communities around the concession</p>	<p>Complied</p>

RSPO P&C Public Summary Report
Revision 14 (Aug 2022)

	<p>agreement, obtained through FPIC, encouraging their involvement in the maintenance and management of these conservation areas.</p> <p>- Minor compliance -</p>	<p>and involved them in the identification and mapping of such sites. This was also confirmed by the communities during the audit stakeholder meetings. Additionally, Brabanta does not restrict communities from accessing the social HCVs as confirmed by the communities during the consultations. Monitoring of social HCVs is done by Brabanta community liaison team in collaboration with the communities themselves. Brabanta is however not permitted into community sacred sites because these are kept secret and have not been disclosed.</p>	
7.12.6	<p>All rare, threatened or endangered (RTE) species are protected, whether or not they are identified in an HCV assessment. A programme to regularly educate the workforce about the status of RTE species is in place. Appropriate disciplinary measures are taken and documented in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect, trade, possess or kill these species.</p> <p>- Minor compliance -</p>	<p>Brabanta employs Security Guards and Forestry Service Agents to monitor HCVs and other areas meant to be protected.</p> <p>A monitoring programme is in place and daily reporting sheets have been prepared to capture field observations (e.g., number of trees cut, clearings sited, fires, location/site/estate/block, number/surface area, RTE capture, harm, collect, trade, possession, killing, person who committed the act, Village/Camp, Comments).</p> <p>Sensitization campaigns are held in Camps and communities on RTE and HCV.</p> <p>Several reports for the year 2022 were made available at the time of the audit: such as Kumunzali, Malongo Bwanga, Kayaya, Matafadi, Nkanga, Kalembe Mpata.</p> <p>The reports are further systematized into HSE Monthly Reports.</p>	Complied
7.12.7	<p>The status of HCVs, HCS forests after 15 November 2018, other natural ecosystems, peatland conservation areas and RTE species is monitored. Outcomes of this monitoring are fed back into the management plan.</p> <p>- Minor compliance -</p>	<p>As previously stated, Brabanta employs Security Guards and Forestry Service Agents to monitor HCVs and other areas meant to be protected.</p> <p>A monitoring programme is in place and daily reporting sheets have been prepared to capture field observations (e.g., number of trees cut, clearings sited, fires, location/site/estate/block, number/surface area, RTE capture, harm, collect, trade, possession, killing, person who committed the act, Village/Camp, Comments).</p>	Complied

		<p>Sensitization campaigns are held in Camps and communities on RTE and HCV.</p> <p>Several reports for the year 2022 were made available at the time of the audit: such as Kumunzali, Malongo Bwanga, Kayaya, Matafadi, Nkanga, Kalembe Mpata.</p> <p>The reports are further systematized into HSE Monthly Reports.</p> <p>Interviews with the Brabanta HSE team revealed that outcomes from monitoring activities are discussed during review and management meetings and recommendations are made on how to use these to improve the management plan.</p>	
7.12.8	<p>(C) Where there has been land clearing without prior HCV assessment since November 2005, or without prior HCV-HCSA assessment since 15 November 2018, the Remediation and Compensation Procedure (RaCP) applies.</p> <p>- Critical (Major) compliance -</p>	<p>Brabanta has not undertaken any new land clearing since 2005. Hence, this indicator is not applicable.</p>	<p>Not Applicable</p>

Appendix B: GHG Reporting Executive Summary

The GHG emissions that were produced in **2021** for **Brabanta POM** and supply base was calculated using the PalmGHG Calculator version 3.0.1. The assessment team had verified the data input in the PalmGHG Calculator against operations records. PalmGHG Calculation Options selected 'Full version' and 'Exclude LUC Emission' calculation option is not applied. The records verified includes:

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

The summary of the Net GHG emitted in **2021** for **Brabanta POM** and supply base are as following:

Emission per product	tCO ₂ e/tProduct
CPO	0.58
PKO	-

Extraction	%
OER	24.32
KER	-

Production	t/yr
FFB Process	65,755.90
CPO Produced	15,993.00
PKO Produced	-

Land Use	Ha
OP Planted Area	6,184.94
OP Planted on peat	0
Conservation (forested)	746.43
Conservation (non-forested)	50.00
Total	6,981.37

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	54,629.71	0.87	-	-	-	-	54,629.71	0.87
CO ₂ Emission from fertilizer	2,115.43	0.03	-	-	-	-	2,115.43	0.03
NO ₂ Emission	514.76	0.01	-	-	-	-	514.76	0.01
Fuel Consumption	1,576.26	0.03	-	-	-	-	1,576.26	0.03
Peat Oxidation	0	0	-	-	-	-	0	0
Sink								
Crop Sequestration	-57,901.78	-0.92	-	-	-	-	-57,901.78	-0.92
Conservation Sequestration	-6,598.44	-0.11	-	-	-	-	-6,598.44	-0.11
Total	-5,664.06	-0.09	-	-	-	-	-5,664.06	-0.09

**Note: Includes both estates and smallholders*

Summary of Mill Emission and Credit

	tCO ₂ e	tCO ₂ e/tFFB
Emission		
POME	12,889.27	0.20
Fuel Consumption	1,372.11	0.02
Grid Electricity Utilization	739.35	0.00
Credit		
Export of Grid Electricity	-41.28	0.00
Sales of PKS	0.00	0.00
Sales of EFB	0.00	0.00
Total	14,959.46	0.22

Summary of Kernel Crusher Emission and Credit (if applicable)

Emissions	tCO ₂ e
PK from own mill	0.00
PK from other source	0.00
Fuel Consumptions	0.00
Total Crusher emissions	0.00

*This mill has no kernel crusher operation.

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

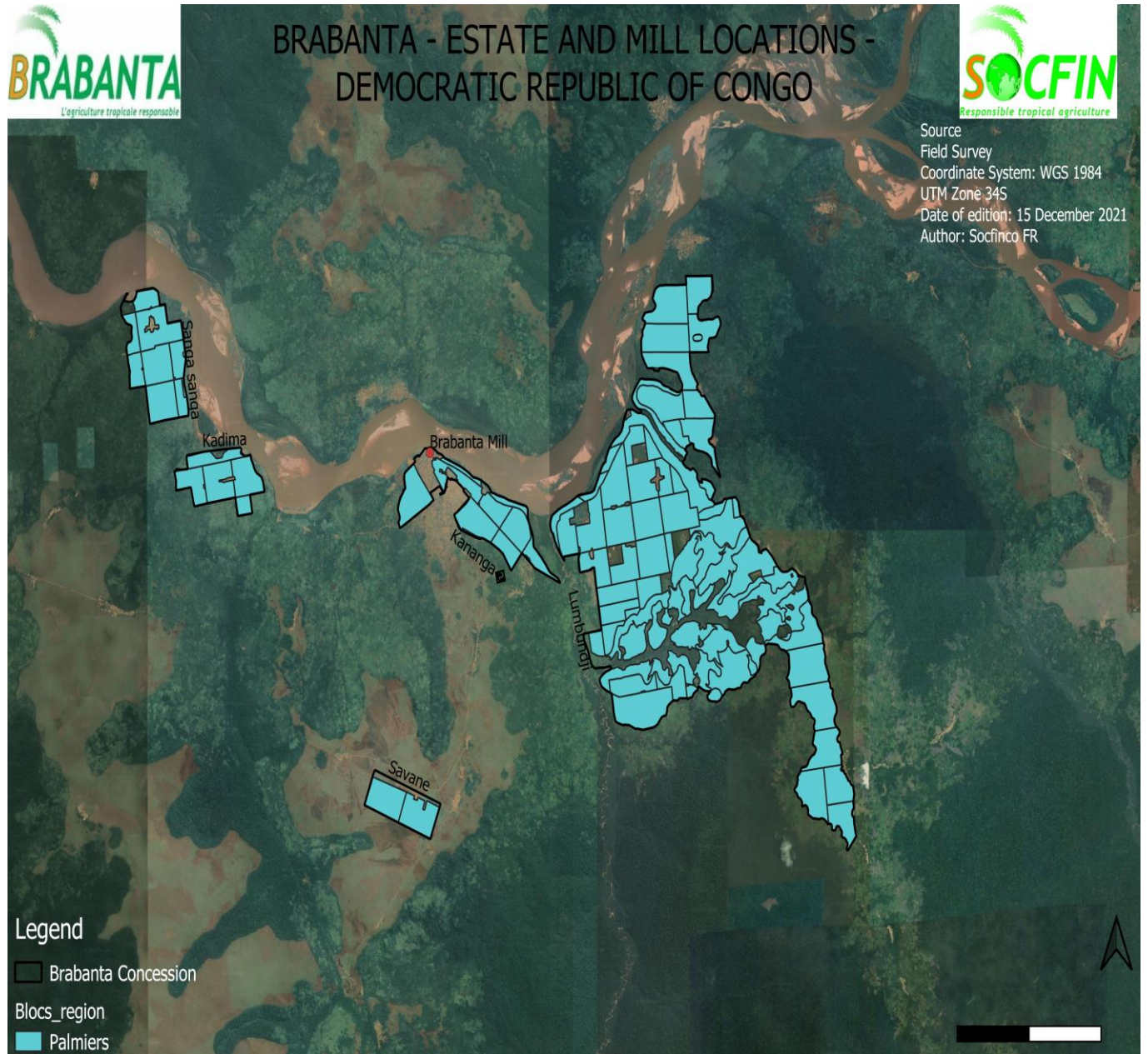
POME Diverted to Anaerobic Digestion:	
Divert to anaerobic pond (%)	100
Divert to methane captured (flaring) (%)	0
Divert to methane captured (energy generation) (%)	0

Appendix C: Location Map of Certification Unit and Supply bases

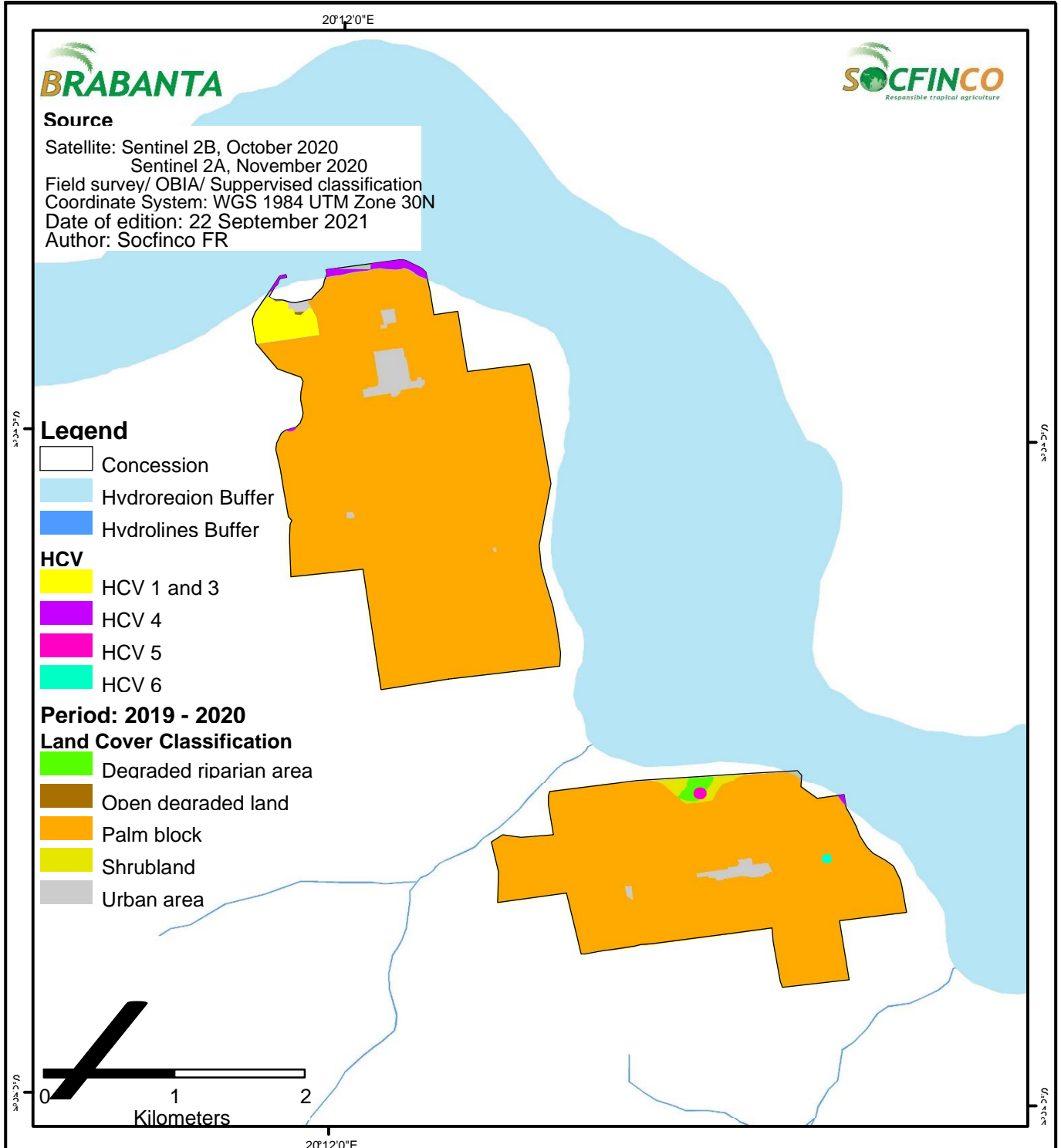


Appendix D: Estate Field Map

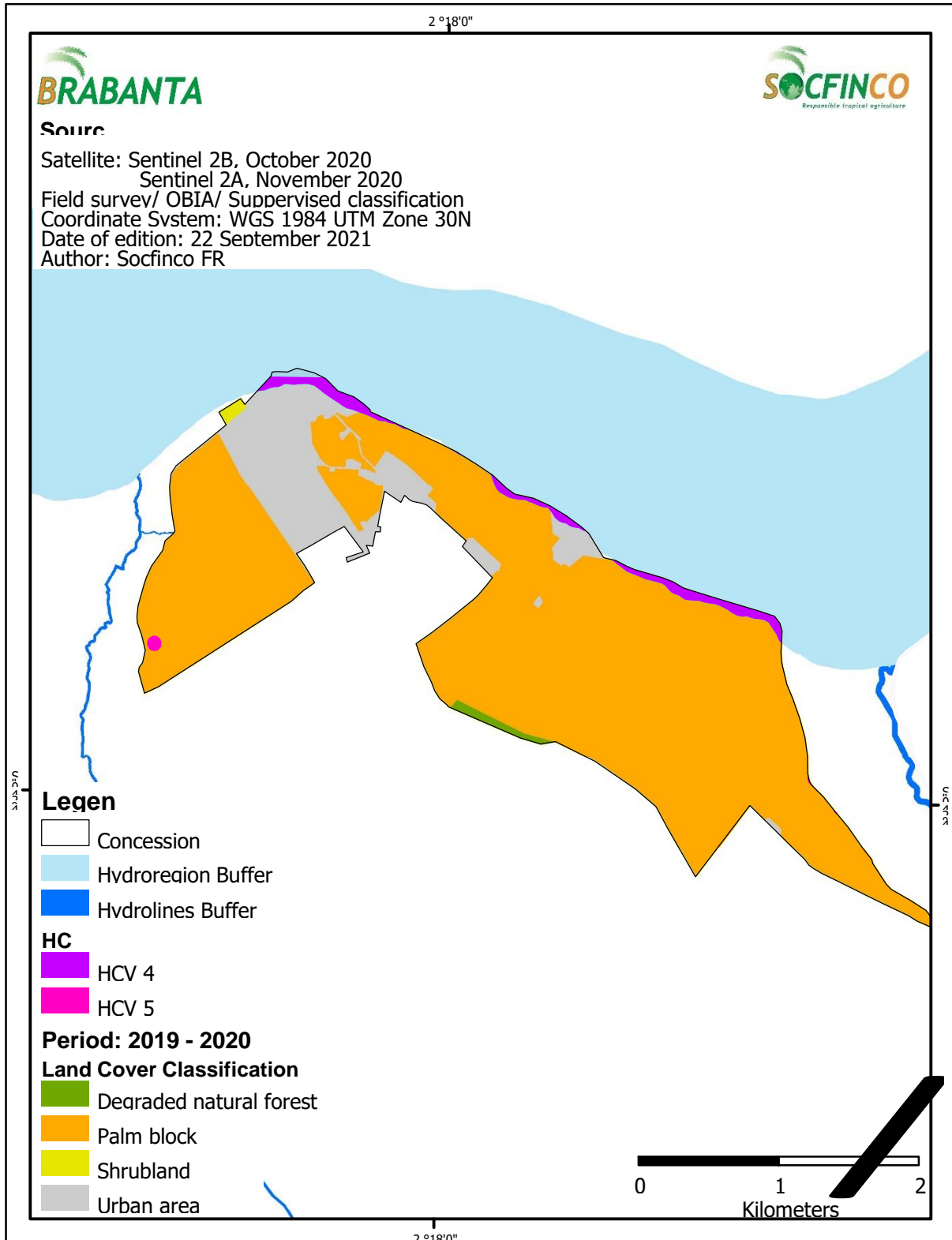
Location of Brabanta POM and the Supply Base Estates.



Sanga Sanga Estate & Kadima Estate



Kanangai Estate



Appendix E: List of Smallholder Registered and/or sampled

Not Applicable

Appendix F: List of Abbreviations

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