

**RSPO PRINCIPLE AND CRITERIA –  
2<sup>ND</sup> ANNUAL SURVEILLANCE ASSESSMENT (ASA2)  
Public Summary Report**

<b>Olam International Limited</b>
Client company Address: 9 Temasek Boulevard #11-02 Suntec Tower Two Singapore
Certification Unit:  <b>Olam Palm Gabon – Bilala Palm Oil Mill &amp; Supply Base</b>  Location of Certification Unit:  PK-19 National Road N1, Mouila, Gabon

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## Section 1: Scope of the Certification Assessment

1. Company Details			
<b>RSPO Membership Number</b>	1-0114-12-000-00	<b>Membership Approval Date</b>	10/02/2011
<b>Parent Company Name</b>	Olam International Limited		
<b>Address</b>	9, Temasek Boulevard, #11-02 Suntec Tower Two, Singapore		
<b>Subsidiary (Certification Unit Name)</b>	Olam Palm Gabon SA – Bilala Palm Oil Mill		
<b>Address</b>	PK-19 National Road N1, Mouila, Gabon		
<b>Contact Name</b>	Ms Audrey Lee Mei Fong (Sustainability Manager)		
<b>Website</b>	<a href="http://olamgroup.com">http://olamgroup.com</a>	<b>E-mail</b>	<a href="mailto:audrey.lee@olamnet.com">audrey.lee@olamnet.com</a>
<b>Telephone</b>	+603 64416771	<b>Facsimile</b>	+603 64416772

2. Certification Information			
<b>Certificate Number</b>	RSPO 671034	<b>Date of First Certification</b>	28/12/2017
		<b>Certificate Start Date</b>	28/12/2017
		<b>Certificate Expiry Date</b>	27/12/2022
<b>Scope of Certification</b>	Palm Oil and Palm Kernel Production		
<b>Applicable Standards</b>	RSPO P&C 2018 Generic with Supply Chain Mass Balance Module		

3. Other Certifications			
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
EU-ISCC-Cert-DE119-24197028	ISCC EU	ASG Cert	26/06/2020

4. Location(s) of Mill & Supply Bases			
Name (Mill / Supply Base)	Location [Map Reference #]	GPS Coordinates	
		Latitude	Longitude
Bilala Palm Oil Mill	Mouila, Gabon, Central Africa	10° 51' 16.30 "E	1° 39' 07.76" S
Estate 1	Mouila, Gabon, Central Africa	10° 57' 43.80" E	1° 46' 37.30" S
Estate 2	Mouila, Gabon, Central Africa	10° 51' 20.20" E	1° 41' 25.70" S
Estate 3	Mouila, Gabon, Central Africa	10° 51' 16.30" E	1° 39' 07.76" S

Estate 4	Mouila, Gabon, Central Africa	10° 49' 53.50" E	1° 39' 29.80" S
Estate 5	Mouila, Gabon, Central Africa	10° 47' 24.10" E	1° 38' 13.20" S
Estate 6	Mouila, Gabon, Central Africa	10° 51' 29.00" E	1° 37' 55.30" S
Estate 10	Mouila, Gabon, Central Africa	10° 58' 47.96" E	1° 54' 01.85" S
Estate 11	Mouila, Gabon, Central Africa	11° 00' 37.13" E	1° 57' 00.95" S
Estate 12	Mouila, Gabon, Central Africa	11° 02' 50.08" E	2° 00' 18.42" S
Estate 13	Mouila, Gabon, Central Africa	11° 07' 08.88" E	2° 04' 28.61" S
Estate 14	Mouila, Gabon, Central Africa	11° 07' 48.17" E	2° 08' 39.27" S
Estate 15	Mouila, Gabon, Central Africa	11° 10' 38.14" E	2° 10' 01.76" S

(Note for Auditors: Deg °; Minutes' ; Seconds". The format must be two decimal points) (Eg. 3° 51' 14.01" N)

### 5. Description of Supply Base

Estate	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted
Estate 1	2,848.46	2,574.06	217.56	5,640.08	50.50
Estate 2	2,783.09	3,022.30	315.21	6,120.60	45.47
Estate 3	2,280.16	1,257.32	124.70	3,662.18	62.26
Estate 4	2,438.61	1,673.76	551.51	4,663.88	52.29
Estate 5	2,908.70	4,604.00	222.45	7,735.15	37.60
Estate 6	2,625.90	4,703.00	203.22	7,532.12	34.86
Estate 10	2,543.00	1,277.85	139.47	3,960.32	64.21
Estate 11	2,545.00	1,100.60	1,285.79	4,931.39	51.61
Estate 12	3,282.00	1,641.44	1,664.36	6,587.80	49.82
Estate 13	3,500.00	1,120.10	579.35	5,199.45	67.31
Estate 14	3,413.00	645.06	164.86	4,222.92	80.82
Estate 15	2,989.00	5,393.46	5,079.17	13,461.63	22.20
<b>Total</b>	<b>34,156.92</b>	<b>29,012.95</b>	<b>10,547.66</b>	<b>73,717.52</b>	<b>46.33</b>

### 6. Plantings & Cycle

Estate	Age (Years)					Mature**	Immature
	0 - 3	4 - 10	11 - 20	21 - 25	26 - 30		
Estate 1	0	2,848.46	0	0	0	2,848.46	0
Estate 2	0	2,783.09	0	0	0	2,783.09	0

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Estate 3	0	2,280.16	0	0	0	2,280.16	0
Estate 4	0	2,438.61	0	0	0	2,438.61	0
Estate 5	0	2,908.70	0	0	0	2,908.70	0
Estate 6	0	2,625.90	0	0	0	2,625.90	0
Estate 10	879.03	1,663.97	0	0	0	1,663.97	879.03
Estate 11	1,142.47	1,402.53	0	0	0	1,402.53	1,142.47
Estate 12	416.65	2,865.35	0	0	0	2,865.35	416.65
Estate 13	517.89	2,982.11	0	0	0	2,982.11	517.89
Estate 14	1,304.42	2,108.58	0	0	0	2,108.58	1,304.42
Estate 15	2,989.00	0	0	0	0	0	2,989.00
<b>Total (ha)</b>	<b>7,249.46</b>	<b>26,907.46</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>26,907.46</b>	<b>7,249.46</b>

**Note:**

7. Certified Tonnage of FFB (Own Certified Scope)					
Estate	Tonnage / year				
	Estimated (Dec 2018-Nov 2019)	Actual (Nov 2018-Oct 2019)		Forecast (Dec 2019-Nov 2020)	
		Previous license period (Nov 2018 – Dec 2018)	Current license period (Jan 2019-Oct 2019)		
Estate 1	43,122.69	17,291.24	107,870.27	44,995.22	
Estate 2	29,587.49			32,736.47	
Estate 3	27,886.89			30,611.26	
Estate 4	29,803.32			38,308.21	
Estate 5	28,165.57			36,090.05	
Estate 6	19,912.11			20,650.60	
Estate 10	1,951.85			10,221.52	
Estate 11	5,612.51			14,805.50	
Estate 12	18,375.79			26,186.36	
Estate 13	23,405.01			26,942.23	
Estate 14	14,460.85			16,368.12	
Estate 15	0			315.10	
<b>Total</b>	<b>242,284.08</b>			<b>125,161.51</b>	<b>298,230.64</b>

**Note:**

8. Certified Tonnage of FFB (from other certified unit(s)) if applicable *				
Estate	Tonnage / year			
	Estimated (Dec 2018-Nov 2019)	Actual (Nov 2018-Oct 2019)		Forecast (Dec 2019-Nov 2020)
	N/A	<i>Previous license period</i> (Nov 2018 – Dec 2018)	<i>Previous license period</i> (Nov 2018 – Dec 2018)	N/A
N/A				
<b>Total</b>				

**Note:**

9. Non-Certified Tonnage of FFB (outside supplier – excluded from certificate) if applicable				
Independent FFB Supplier	Tonnage / year			
	Estimated (Dec 2018-Nov 2019)	Actual (Nov 2018-Oct 2019)		Forecast (Dec 2019-Nov 2020)
N/A		<i>Previous license period</i> (Nov 2018 – Dec 2018)	<i>Previous license period</i> (Nov 2018 – Dec 2018)	
<b>Uncertified estates</b>	<b>N/A</b>	<b>23,979.74</b>		<b>N/A</b>
<b>Total</b>	<b>N/A</b>	<b>23,979.74</b>		<b>N/A</b>

**Note:**

10. Certified Tonnage				
Mill Capacity: 90 MT/hr  SCC Model: MB	Estimated (Dec 2018-Nov 2019)	Actual (Nov 2018-Oct 2019)		Forecast (Dec 2019-Nov 2020)
	FFB	FFB		FFB
	<b>242,284.08</b>	<i>Previous license period</i> (Nov 2018 – Dec 2018)	<i>Previous license period</i> (Nov 2018 – Dec 2018)	<b>298,230.63</b>
		<b>17,291.24</b>	<b>107,870.27</b>	
	<b>CPO (OER: 24.00%)</b>	<b>CPO (OER: 23.06 %)</b>		<b>CPO (OER: 24.22 %)</b>
	<b>58,148.18</b>	<b>28,865.58</b>		<b>72,231.46</b>
	<b>PK (KER: 4.31%)</b>	<b>PK (KER: 4.11 %)</b>		<b>PK (KER: 4.5 %)</b>

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	<b>10,442.44</b>	<b>5,138.58</b>	<b>13,420.38</b>
<b>Total</b>	<b>242,284.08</b>	<b>125,161.51</b>	<b>298,230.63</b>
<b>Note:</b>			

<b>11. Actual Sold Volume (CPO)</b>					
	RSP0 Certified	Other Schemes Certified		Conventional	Total
		ISCC	RSB		
<b>CPO (MT)</b>	0	3,035.77	0	18,622.5	21,658.27

<b>12. Actual Sold Volume (PK)</b>					
	RSP0 Certified	Other Schemes Certified		Conventional	Total
		ISCC	RSB		
<b>PK (MT)</b>	4,525	0	0	0	4,525

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



## Section 2: Assessment Process

### Certification Body:

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

The on-site annual surveillance assessment was conducted from 19-25/11/2019. The audit programme is included as Appendix D. The approach to the audit was to treat the mill and its supply base as an RSPO Certification Unit. Mill was audited together with the sample estates. A range of environmental and social factors were covered. This includes consideration of topography, palm age, proximity to areas with HCVs, declared conservation areas and local communities.

The Major NC close out on-site assessment was conducted on 05/02/2020. The audit programmes are included in Section 2.3.

The methodology for collection of objective evidence included physical site inspections, observation of tasks and processes, interviews of staff, workers and their families and external stakeholders, review of documentation and monitoring data. RSPO Principles & Criteria 2018 Generic and RSPO Supply Chain Certification Standard 2017 were used to guide the collection of information to assess compliance. The comments made by external stakeholders were also taken into account in the assessment.

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

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

Meetings were held with stakeholders to seek their views on the performance of the company with respect to the RSPO requirements and aspects where they considered that improvements could be made. At the start of each

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meeting, the interviewer explained the purpose of the audit followed by an evaluation of the relationship between the stakeholder and the company before discussions proceeded. The interviewer recorded comments made by stakeholders and these have been incorporated into the assessment findings.

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

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

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

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

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

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

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

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**Tentative Date of Next Visit:** November 19, 2020 – November 25, 2020

**Total No. of Mandays: 18 on-site man days**

**2.2 BSI Assessment Team:**

<b>Team Member Name</b>	<b>Role</b> <i>(Team Leader or Team member)</i>	<b>Qualifications</b> <i>(Short description of the team members)</i>
Mohamed Zainal Abidin Hidhir	Team Leader	Holds a Bachelor Degree in Chemical Engineering from National University of Malaysia. He has 7 years working experience in palm oil industry specifically on palm oil milling for 5 years. He also has the experiences as auditor for several standards including ISO 9001, ISO 14001, ISO 45001, MSPO and RSPO in his previous certification body. He completed the ISO 9001 Lead Auditor Course, ISO 14001 Lead Auditor Course and ISO 45001 Lead Auditor Course, Endorsed RSPO P&C Lead Auditor Course, MSPO Awareness Training and Endorsed RSPO SCCS Lead Auditor Course. He had been involved in RSPO auditing since May 2012 in more than various companies in Malaysia. In this assessment, he assessed on the aspects of supply chain, legal, mill best practices, safety and health, environmental and workers and stakeholders consultation. He is fluent in both verbal/written in English.
Nicholas Cheong	Team Member	Holds a Master of Environmental Management from the University Putra Malaysia and Bachelor of Science (Food Science) from Charles Sturt University Australia. He has more than 7 years of working experience in sustainability auditing for palm oil industry and hydropower plant. He is also an expert in Greenhouse Gas emissions accounting. He has also 2 years of working experience in wastewater treatment and operations. He has completed the ISO9001, ISO14001, RSPO P&C Lead Auditor course, RSPO Supply Chain Lead Auditor Course, RBA Labor & Ethic Lead Auditor Course and MSPO Awareness Training. In his previous certification body, he was a Lead Assessor for Clean Development Mechanism, World Commission of Dam and ISCC. He had been involved in Sustainable Palm Oil auditing for more than 5 years. In this assessment, the focus element includes legal requirements, social and workers welfare, workers health and safety and supply chain. He is fluent in both verbal/written in English.
Hu Ning Shing	Team Member	She holds Bachelor Degree in Science majoring in Applied Chemistry, graduated from University of Malaya on 2011. She has 5 years working experience in rubber and palm oil industry. She also has the experiences as auditor for several standards including ISO 9001, MSPO and RSPO in her previous certification body. She completed the ISO 9001 Lead Auditor Course on 2016, Endorsed RSPO P&C Lead Auditor Course in 2012 and Endorsed RSPO SCCS Lead Auditor Course in 2015. She had been involved in RSPO auditing since November 2015 in more than various companies in Malaysia. During this assessment, she assessed on the aspects of social. She is fluent in Bahasa Malaysia and English languages.

**Accompanying Persons:**

No.	Name	Role
1	Larissa Nancy Mboumba (LNM)	Local Translator
2	Joshard-Martin Mbambi-Moyale (JMM)	Local Translator
3	Kouadio Kouame' Charles Innocent (CK)	Technical expert for the assessment team.
4	Maris Zudrags	Witness assessor (ASI)
5	Edwige EYANG EFFA	Technical expert (ASI)

**2.3 Assessment Plan**

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

Date	Time	Subjects	MH	NC	NS	CK	LN M	JM M
Saturday 16/11/2019	2350	Depart from KUL to LBV via CDG and AMS	√	√	√	√	-	-
Saturday 16/11/2019	PM	Depart from Cote D'ivoire to Libreville ETA 1820. Check in at Le Meridian, Libreville	-	-	-	√	-	-
Sunday 17/11/2019	PM	Arrival at LBV ETA 1945. Check in at Le Meridian, Libreville	√	√	√	-	-	-
Monday 18/11/2019	0800	Depart from Le Meridian, LBV to site Mouila. Overnight at PK19 guesthouse.	√	√	√	√	√	√
Tuesday 19/11/2019	0800-0830	<b>Opening Meeting at main office (PK19)</b> Safety briefing and presentation by Olam Team (if any) <ul style="list-style-type: none"> <li>• Presentation by BSI Lead Auditor -introduction of team member and assessment agenda</li> <li>• Confirmation of assessment scope and finalized stakeholders list for interview</li> </ul>	√	√	√	√	√	√
	0900-1230	<b>Main office (PK19)</b> – Documentation review covering entire certification unit/lot 1 estates document: P1 – Behave ethically and transparently P2 – Operate legally and respect rights P3 – Optimize productivity, efficiency, positive impact and resilience P4 – Respect community and human rights and deliver benefit P5 – Support smallholder inclusion P6 – Respect workers’ rights and conditions P7 – Protect, conserve and enhance ecosystems and the environment	√	√	√	√	√	√

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		<ul style="list-style-type: none"> <li>- Workers list and sampling</li> <li>- Employment procedure and process</li> <li>- Social impact assessment / management plan</li> <li>- Communication and Grievance procedures</li> <li>- Code of ethical conduct</li> <li>- Stakeholder list and consultation</li> <li>- Operational service contractor contract</li> <li>- Legality of FFB</li> <li>- Local sustainability</li> </ul>	-	-	√	-	√	-
		<ul style="list-style-type: none"> <li>- Occupational health and safety (H&amp;S) mitigation plan and</li> <li>- Worker trainings</li> <li>- Risk assessment and medical records</li> <li>- Chemical utilization risk</li> <li>- Medical surveillance records</li> <li>- PPE issuance and monitoring</li> <li>- Safety meeting and person in charge for H&amp;S</li> <li>- Emergency procedures</li> <li>- PPE compliance and monitoring</li> <li>- Medical care/insurance for workers</li> <li>- LTA/LTI monitoring</li> </ul>	√	-	-	-	-	√
		<ul style="list-style-type: none"> <li>- Environmental Impact assessment / Environmental Management plan for whole certification unit</li> <li>- Water management and consumptions</li> <li>- Waste management / fossil fuel consumptions / GHG and pollutant management / POME</li> <li>- HCV / RTE and management plan</li> <li>- No use of fire</li> </ul>	-	√	-	-	√	-
		<p>Good Agriculture Practice (GAP)</p> <ul style="list-style-type: none"> <li>- Soil analysis (mapping) and fertility</li> <li>- Road maintenance and peat soil</li> <li>- IPM and Pesticide usage plan</li> <li>- Planting and land statement</li> <li>- New Planting (if any)</li> </ul>						

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		<ul style="list-style-type: none"> <li>- Business and management plan/replanting programme</li> <li>- Management review</li> <li>- Continuous improvement action plan</li> <li>- Annual reports – RSPO matrix template</li> <li>- Operation procedures</li> </ul> <p>Smallholder inclusion (if any)</p> <ul style="list-style-type: none"> <li>- Transparency (pricing, term and conditions etc)</li> <li>- Payment</li> <li>- Stamping/calibration of weighing equipment</li> <li>- ICS and grievance mechanism</li> </ul>	√	-	-	-	√	-
		<p>Human rights</p> <ul style="list-style-type: none"> <li>- Policy on human rights, prohibition of retaliation</li> <li>- Conflict resolution process</li> <li>- Contribution to community development</li> <li>- FPIC process, customary rights etc.</li> <li>- Land conflict issues and resolution process</li> <li>- No discrimination and equal opportunities</li> <li>- Recruitment process</li> <li>- Decent living wages</li> <li>- Freedom of association (FOA)</li> <li>- Prohibition of child labor, young workers etc</li> <li>- Prohibition of sexual harassment</li> <li>- Reproductive rights</li> <li>- Forced labor</li> </ul>	-	√	-	√	-	-
	12.30-13.30	Lunch break	√	√	√	√	√	√
	13:30-16.30	Continue with unfinished elements (pre-lunch activities)	√	√	√	√	√	√
	16:30 – 17:00	Interim closing for day 1	√	√	√	√	√	√
Wednesday 20/11/2019	08:00	Travel to Bilala POM	√	√	√	√	√	√
<b>Bilala POM</b>	08:30-10:30	<p><b>Bilala POM</b></p> <ul style="list-style-type: none"> <li>• Mill Visit covering FFB receiving, milling process, warehouse, workshop, wastes management (including Landfill is applicable), Effluent Ponds, OSH &amp; ERP, environmental management, POME application, water</li> </ul>	√	√	√	√	√	√

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		treatment, chemical storage and laboratory. Workers interview covering social elements						
	10:30 – 12:30	<b>Interview with stakeholders</b> Village rep Community/stakeholder/ affected parties	-	-	√	√	-	-
	12:30 – 13:30	Lunch break	√	√	√	√	√	√
	13:30 – 16:30	Continue with unfinished elements from pre-lunch activities  Documentation review continue P1 – Behave ethically and transparently P2 – Operate legally and respect rights P3 – Optimize productivity, efficiency, positive impact and resilience P4 – Respect community and human rights and deliver benefit P5 – Support smallholder inclusion P6 – Respect workers’ rights and conditions P7 – Protect, conserve and enhance ecosystems and the environment  Document review Supply chain requirements for mill (module E: mass balance) - Registration - Documented procedures - Internal audit - Outsourcing activities - Traceability (goods in and out) - Record keeping - Conversion factor - Registration of transaction - Claims  - Operational procedures - Health and safety plan - Risk Assessment and mitigation - Emergency preparedness and response - Workers insurance / Lost time accident records / clinical records	√	√	√	√	√	√
			-	√	-	-	√	-
			√	-	-	-	-	√

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Date	Time	Subjects	MH	NC	NS	CK	LN M	JM M
		<ul style="list-style-type: none"> <li>- Environmental Aspect and impact</li> <li>- Environmental management plan</li> <li>- Pollution prevention plan</li> <li>- Waste management / fossil fuel consumptions / GHG and pollutant management / POME</li> </ul>						
		<ul style="list-style-type: none"> <li>- Workers list and sampling</li> <li>- Employment procedure and process</li> <li>- Social impact assessment / management plan</li> <li>- Communication and Grievance procedures</li> <li>- Code of ethical conduct</li> <li>- Stakeholder list and consultation</li> <li>- Operational service contractor contract</li> <li>- Legality of FFB</li> <li>- Local sustainability</li> </ul> <p>Human rights</p> <ul style="list-style-type: none"> <li>- Policy on human rights, prohibition of retaliation</li> <li>- Conflict resolution process</li> <li>- Contribution to community development</li> <li>- FPIC process, customary rights etc.</li> <li>- Land conflict issues and resolution process</li> <li>- No discrimination and equal opportunities</li> <li>- Recruitment process</li> <li>- Decent living wages</li> <li>- Freedom of association (FOA)</li> <li>- Prohibition of child labor, young workers etc</li> <li>- Prohibition of sexual harassment</li> <li>- Reproductive rights</li> <li>- Forced labor</li> </ul>	-	-	√	√	-	-
	16:00 – 16:30	Interim closing for day 2	√	√	√	√	√	√
Thursday 21/11/2019	0730	<b>Traveling to estate 14 &amp; 15</b>	√	√	√	√	√	√
<b>Estate 14 &amp; 15</b>	08:30 – 12:30	<b>Estate 14 Estate</b> Field visit covering boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation and chemical management, OSH&ERP, waste management and SEIA requirement.	√	√	-	-	√	√
	1030:12 :30	<b>Interview with stakeholders</b> Village rep Community/stakeholder/ affected parties	-	-	√	√	-	-



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Date	Time	Subjects	MH	NC	NS	CK	LN M	JM M
	12:30 – 13:30	Lunch break	√	√	√	√	√	√
	13:30 – 16:30	<b>Estate 15 Estate</b> Field visit covering boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation and chemical management, OSH&ERP, waste management and SEIA requirement.  Centralized facility inspection (estate 14 & 15) - Line site/quarters and facilities inspection. including clinic/hospital/dispensary	√	√	√	√	√	√
	16:30- 17:00	Interim closing for day 3	√	√	√	√	√	√
Friday 22/11/2019	08:30 - 12:30	<b>Main office (lot 3)</b> – Documentation review covering entire certification unit/lot 1 estates document: P1 – Behave ethically and transparently P2 – Operate legally and respect rights P3 – Optimize productivity, efficiency, positive impact and resilience P4 – Respect community and human rights and deliver benefit P5 – Support smallholder inclusion P6 – Respect workers’ rights and conditions P7 – Protect, conserve and enhance ecosystems and the environment  - Workers list and sampling - Employment procedure and process - Social impact assessment / management plan - Communication and Grievance procedures - Code of ethical conduct - Stakeholder list and consultation - Operational service contractor contract - Legality of FFB - Local sustainability  Occupational health and safety (H&S) mitigation plan - Worker trainings - Risk assessment and medical records - Chemical utilization risk - Medical surveillance records	√	√	√	√	√	√
			-	-	√	√	-	-
			√	-	-	-	-	√

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Date	Time	Subjects	MH	NC	NS	CK	LN M	JM M
		<ul style="list-style-type: none"> <li>- PPE issuance and monitoring</li> <li>- Safety meeting and person in charge for H&amp;S</li> <li>- Emergency procedures</li> <li>- PPE compliance and monitoring</li> <li>- Medical care/insurance for workers</li> <li>- LTA/LTI monitoring</li> </ul> <p>Good Agriculture Practice (GAP)</p> <ul style="list-style-type: none"> <li>- Soil analysis (mapping) and fertility</li> <li>- Road maintenance and peat soil</li> <li>- IPM and Pesticide usage plan</li> <li>- Planting and land statement</li> <li>- New Planting (if any)</li> </ul> <ul style="list-style-type: none"> <li>- Environmental Impact assessment / Environmental Management plan for whole certification unit</li> <li>- Water management and consumptions</li> <li>- Waste management / fossil fuel consumptions / GHG and pollutant management / Renewal energy utilization.</li> <li>- HCV / RTE and management plan</li> <li>- No use of fire</li> </ul> <p>Human rights</p> <ul style="list-style-type: none"> <li>- Policy on human rights, prohibition of retaliation</li> <li>- Conflict resolution process</li> <li>- Contribution to community development</li> <li>- FPIC process, customary rights etc.</li> <li>- Land conflict issues and resolution process</li> <li>- No discrimination and equal opportunities</li> <li>- Recruitment process</li> <li>- Decent living wages</li> <li>- Freedom of association (FOA)</li> <li>- Prohibition of child labor, young workers etc</li> <li>- Prohibition of sexual harassment</li> <li>- Reproductive rights</li> <li>- Forced labor</li> </ul>	-	√	-	-	√	-
	1030-1230	<b>Interview with stakeholders</b> Village rep Community/stakeholder/ affected parties	-	-	√	√	-	
	12:30 – 13:30	Lunch break	√	√	√	√	√	√

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Date	Time	Subjects	MH	NC	NS	CK	LN M	JM M
	13:30-16:30	Continue with unfinished elements (pre-lunch activities)	√	√	√	√	√	√
	16:30-17.00	Interim closing for day 4	√	√	√	√	√	√
Saturday 23/11/2019	08:30 – 12:30	<b>Estate 1&amp;2</b> Field visit covering boundary inspection, field operations, staff & workers interview, buffer zone, HCV area, IPM implementation and chemical management, OSH&ERP, waste management and SEIA requirement.	√	√	-	-	√	√
<b>Estate 1&amp;2</b>	1030-1230	<b>Interview with stakeholders</b> Village rep Community/stakeholder/ affected parties	-	-	√	√	-	-
	12:30 – 13:30	Lunch break	√	√	√	√	√	√
	13:30-16:30	<b>Estate 1&amp;2</b> Centralized facilities inspection - Line site/quarters and facilities inspection. including clinic/hospital/dispensary	√	√	√	√	√	√
	16:30-17.00	Interim closing for day 5	√	√	√	√	√	√
	Sunday 24/11/2019	AM-PM	Sunday break	√	√	√	√	√
Monday 25/11/2019	08:30-12:30	<b>Main office (PK19)</b> – Documentation review covering entire certification unit/lot 1 estates document: P1 – Behave ethically and transparently P2 – Operate legally and respect rights P3 – Optimize productivity, efficiency, positive impact and resilience P4 – Respect community and human rights and deliver benefit P5 – Support smallholder inclusion P6 – Respect workers’ rights and conditions P7 – Protect, conserve and enhance ecosystems and the environment  Requirement for uncertified management unit, rules of partial certification. Positive assurance/internal audit  - Workers list and sampling - Employment procedure and process - Social impact assessment / management plan	√	√	√	√	√	√
			-	√	-	-	√	-
			-	-	√	√	-	-

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Date	Time	Subjects	MH	NC	NS	CK	LN M	JM M
		<ul style="list-style-type: none"> <li>- Communication and Grievance procedures</li> <li>- Code of ethical conduct</li> <li>- Stakeholder list and consultation</li> <li>- Operational service contractor contract</li> <li>- Legality of FFB</li> <li>- Local sustainability</li>   <li>- Environmental Impact assessment / Environmental Management plant</li> <li>- Water management and consumptions</li> <li>- Waste management / fossil fuel consumptions / GHG and pollutant management / Renewal energy utilization.</li> <li>- HCV / RTE and management plan</li> <li>- No use of fire</li>   <li>Occupational health and safety (H&amp;S) mitigation plan</li> <li>- Worker trainings</li> <li>- Risk assessment and medical records</li> <li>- Chemical utilization risk</li> <li>- Medical surveillance records</li> <li>- PPE issuance and monitoring</li> <li>- Safety meeting and person in charge for H&amp;S</li> <li>- Emergency procedures</li> <li>- PPE compliance and monitoring</li> <li>- Medical care/insurance for workers</li> <li>- LTA/LTI monitoring</li>   <li>Good Agriculture Practice (GAP)</li> <li>- Soil analysis (mapping) and fertility</li> <li>- Road maintenance and peat soil</li> <li>- IPM and Pesticide usage plan</li> <li>- Planting and land statement</li> <li>- New Planting (if any)</li>   <li>Human rights</li> <li>- Policy on human rights, prohibition of retaliation</li> <li>- Conflict resolution process</li> <li>- Contribution to community development</li> <li>- FPIC process, customary rights etc.</li> <li>- Land conflict issues and resolution process</li> </ul>	<p>-</p> <p>√</p> <p>√</p> <p>-</p> <p>-</p>	<p>√</p> <p>-</p> <p>-</p> <p>-</p> <p>-</p>	<p>-</p> <p>-</p> <p>-</p> <p>-</p> <p>√</p>	<p>-</p> <p>-</p> <p>-</p> <p>-</p> <p>√</p>	<p>√</p> <p>-</p> <p>-</p> <p>-</p> <p>-</p>	<p>-</p> <p>-</p> <p>√</p> <p>-</p> <p>-</p>

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Date	Time	Subjects	MH	NC	NS	CK	LN M	JM M
		- No discrimination and equal opportunities - Recruitment process - Decent living wages - Freedom of association (FOA) - Prohibition of child labor, young workers etc - Prohibition of sexual harassment - Reproductive rights - Forced labor						
	12:30-13:30	Lunch break	√	√	√	√	√	√
	13:30-16:30	Continue with unfinished elements from pre-lunch activities	√	√	√	√	√	√
	16:30-17:00	Interim closing for day 6	√	√	√	√	√	√
Tuesday 26/11/2019	0830	Audit team discussion and closing meeting	√	√	√	√	√	√
	0930	Closing meeting with ASI	√	√	√	√	√	√
	1030	Travelling back to Libreville and home destination	√	√	√	√	√	√

**Major NC close out visit**

PRELIMINARY AGENDA				
Date	Time	Subjects	Mohd Hidhir	Nancy
Sunday 2/2/2020	PM	Depart from KUL to LBV via SIN and CDG	√	-
Monday 3/2/2020	PM	Arrival at LBV ETA 1945. Check in at Re-Ndama Hotel, Libreville	√	-
Tuesday 4/2/2020	AM	Travelling to Mouila Concession	√	√
Wednesday 5/2/2020	0830	Opening Meeting: <ul style="list-style-type: none"> <li>Opening Presentation by Audit team leader.</li> <li>Briefing on site verification plan</li> </ul>	√	√
	09.00 – 12.30	Mouila Concession – Verification on previous Major NC. Site observation, workers interview (individual and group session) if necessary Document review – implemented evidence	√	√

PRELIMINARY AGENDA				
Date	Time	Subjects	Mohd Hidhir	Nancy
	12.30 – 13.30	Lunch break	√	√
	13.30	Continue with unfinished elements	√	√
	16.00	Closing meeting	√	√
Thursday 5/2/2020	AM	Travel back to LBV	√	√
	2250	Travel back to KUL via AF 977 ETA 2315	√	-

### Section 3: Assessment Findings

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

- Olam International Multiple Management Units / Time Bound Plan
- RSPO P&C 2018 Generic
- RSPO Group Certification Standard 2016
- RSPO Supply Chain Certification Standard 2017
- RSPO P&C National Interpretation \_\_\_\_\_

#### 3.2 Time Bound Plan progress for multiple management units

Time Bound Plan		
Requirement	Remarks	Compliance
Does the plan include all current subsidiaries, estates and mills that is under the control of the holding company?	<p>The time bound plan includes all operating units in Gabon, Africa i.e. Awala, Mouila Lot 1, 2 and 3, Makouke and Sotrader Ndende.</p> <p>The certification plan is last revised and approved in August 2016 to include new acquisition (Makouke).</p> <p>To date, certification was achieved according to the time bound plan. There are two established CPO mills and one KCP, all these facilities are currently certified. Progress are reported on the quarterly palm sustainability dashboard which is available on the Olam's website.</p>	Yes
Have all the estates and mills certified within five years after obtaining RSPO membership?	<p>Olam joined the RSPO in 2011, however all our development is new planting (since 2011 to 2017) according to the RSPO NPP. Hence certification time bound plan is designed according to the completion of planting and establishment of infrastructure i.e. mill and others.</p> <p>Olam are fully supportive of the Roundtable on Sustainable Palm Oil (RSPO). To date</p>	Yes

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	<p>55,385 ha of our palm plantations in Gabon are RSPO certified and OALM is on track to achieve 100 per cent RSPO certification of our operations in Gabon by 2021.</p> <p>In 2011, Olam was the first company to meet the RSPO's new plantings requirements in Africa for the Awala plantation, and in August 2016 it became the first African new plantation to achieve RSPO certification. In January 2018, the Bilala mill and plantation (Lot 1) of Mouila Lot 1 plantation achieved certification and expected to achieve certification for the Makouke operations in 2019.</p>	
<p>Have there been any new acquisitions? If yes, the new acquisitions shall be certified within three-year from the date of acquisition. Certification plan for the new acquisition shall be available.</p>	<p>Yes. New acquisition of existing plantation from SIAT Gabon (Makouke) was finalized in July 2016. Announcement was published and declared on the website and 2017 ACOP.</p>	<p>Yes</p>
<p>Have there been any changes to the time-bound plan since the last audit (both new acquisition and existing)? If yes, justification is required.          Is this consistent with the ACOP reporting?</p>	<p>Based on the age of plantations, location, mill developments, infrastructure and compliance with applicable law, the time bound plan was deemed to be challenging since Olam has developed the plantation at very early stage which involved the New Planting Procedure (NPP) where the land development and initial planting was only started in 2012 in Gabon</p>	<p>Yes</p>
<p>Have there been any isolated lapses in implementation of the plan? If yes a <b>Minor</b> non-compliance shall be raised</p>	<p>No lapse and in full compliance.</p>	<p>Yes</p>
<p>Have there been any fundamental failure (e.g. unable to justify delay in planning the assessments) to proceed with implementation of the plan? If yes a <b>Major</b> non-compliance shall be raised</p>	<p>No.</p>	<p>Yes</p>
<p><b>Un-Certified Units or Holdings</b></p>		
<p>No replacement after dates defined in NIs Criterion 7.3:  <ul style="list-style-type: none"> <li>• Primary forest.</li> <li>• Any area required to maintain or enhance HCVs in accordance with RSPO P&amp;C criterion 7.3.</li> </ul> </p>	<p>HCV assessment has been conducted by Proforest prior to Awala development and according to the RSPO NPP. Public summary report is available on the RSPO's website and the Olam's <a href="#">website</a>.</p>	<p>Yes</p>
<p>Any new plantings since January 1<sup>st</sup> 2010 shall comply with the RSPO New Plantings Procedure.</p>	<p>All uncertified new development areas including Mouila 2, 3, Lot 3 extension have completed NPP and approved after the RSPO 30-days public consultation.</p>	<p>Yes</p>

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<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&amp;C criteria 2.2, 6.4, 7.5 and 7.6.</p> <p>The RSPO RaCP tracker shall be checked to confirm for any land conflicts/Liabilities <a href="https://www.rspo.org/certification/remediation-and-compensation/racp-tracker">https://www.rspo.org/certification/remediation-and-compensation/racp-tracker</a>. The progress on the Liabilities shall be verified and reported.</p>	<p>Mouila Lot 2 in March 2017, 242 ha of community set aside (HCV6) identified through FPIC process claimed by Bemboudie Village is mistakenly classified as development area under Boungounga Village who share some families and territories with Bemboudie.</p> <p>Mutual agreement and resolutions was reached through direct engagement and third party facilitation. Grievance is closed. See <a href="#">public record</a>.</p> <p>Meeting record, agreement and official reply from the Bemboudie village are available.</p> <p>Based on RaCP tracker, no liability reported under Olam International Limited.</p>	<p>Yes</p>
<p>Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&amp;C criterion 6.3.</p>	<p>Meeting and strikes called by self-elected workers' representative from Mouila was registered in Oct 2018. Key issues raised including: 1. Non-renewal of temporary contract workers (CDI). 2. Employment of foreign workers 3. Additional demands on top of the Collective Agreements made in Feb 2017.</p> <p>Summary of actions are published on the <a href="#">website</a>.</p>	<p>Yes</p>
<p>Any Legal non- compliance is being addressed through measures consistent with the requirements of RSPO P&amp;C criteria 2.1</p>	<p>No legal non-compliance. A separate external legal audit was conducted in 2017 and 2018 (annual basis).</p>	<p>Yes</p>
<p>Did the company conduct internal audit against the uncertified management units requirement? If yes, a positive assurance statement shall be available.</p>	<p>Internal assessment against the standard has been completed and action plan is implemented. A positive assurance statement has been produced and verifiable through the internal audit report and action plan.</p>	<p>Yes</p>
<p>Have there been any stakeholder (including NGO) consultation conducted?</p>	<p>Yes, during SEIA and HCV assessment development phases.</p>	<p>Yes</p>

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

<b>Progress of scheme smallholders or outgrowers towards compliance with relevant standards</b>		
<b>Requirement</b>	<b>Remarks</b>	<b>Compliance</b>
<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>Not applicable</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>		
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### 3.4 Details of findings

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

During the 2<sup>nd</sup> Annual Surveillance Assessment there were 8 Major & 15 Minor nonconformities raised. The *Bilala POM* Certification unit submitted Corrective Action Plans for the nonconformity. Corrective action plans with respect to the nonconformity was reviewed by the BSI audit team and accepted.

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

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

Non-conformity			
<b>NCR Ref #</b>	1849207-201909-M2	<b>Clause &amp; Category (Major / Minor)</b>	Indicator 3.6.2 Major
<b>Date Issued</b>	25/11/2019	<b>Due Date</b>	22/02/2020
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	05/02/2020
<b>Statement of Nonconformity:</b>	H&S plan to address health and safety risks to people was not effectively monitored.		
<b>Requirement Reference:</b>	The effectiveness of the H&S plan to address health and safety risks to people is monitored.		
<b>Objective Evidence:</b>	Observed unsafe/condition; i) Workers were standing in the truck without proper seat and protection. Location: PK19 entrance ii) Improper use of safety boot while doing work. Location: estate 12 centralized workshop		
<b>Corrections:</b>	i) Policy briefing to all contractors (including transportation) during renewal of contract i.e. Jan 2020. ii) Contractor shall acknowledge understanding of Olam's policy through a documented record attached with their valid contract – date of briefing, name of contractor, policies briefed, signature. iii) Raise PPE awareness briefing to all workforce and operators at all facilities.		
<b>Root Cause Analysis:</b>	i) Olam safety policy including transportation safety policy are not respected by contractor trucks. ii) All contractor trucks are registered with central workshop, however safety examination by respective workshop does not include proper rain cover and benches. iii) Awareness of right use of PPE is lacking amongst workforce.		
<b>Corrective Actions:</b>	1. During renewal of contract in Jan 2020, briefing on all relevant Olam policies. - Safety policy - Environment policy - Fair employment policy - Human Rights policy - Whistle Blowing Policy - And other updated Olam's policies 2. Briefing record (date, name of contractor, type of policies briefing, signature) to be attached with the renewed contract. 3. All camion provided by transportation contractors is checked by workshop to ensure provision of rain cover and benches by 15 Jan 2020. Camion which are not fully equipped could not be used for Olam transportation after 15 Jan 2020. 4. Continue to monitor condition of all contractor camion through monthly HR monitoring, any contractor in breach of Olam's policy will be suspended. 5. Conduct right use of PPE to all workforce during muster and provide awareness poster on PPE use at facilities i.e. biometric center, workshop, clinic, stores, mill and office.		
<b>Assessment Conclusion:</b>	Major NC close out verification: Verified policy briefing given to contractors during contract signing for renewal. All Olam's policies were briefed to contractor on 18/1/20. Evidence of meeting minute dated 18/1/20 was sighted. Details of company's policies, rules and regulations were explained and acknowledged by the contractors. Acknowledgement letter/declaration by transporter (Geotechnics and DGNS) were evident.		

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

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	<p>ii) HR to disseminate below SOP to delegate and Gender Committee with a letter of acknowledgement and contact details from OPG, a copy of this info to be sent to relevant authorities (Labour Department) in Mouila:</p> <ul style="list-style-type: none"> <li>- Grievance Procedures</li> <li>- All Delegate meeting minutes in 2019</li> <li>- Updated FEP and Human Rights Policy</li> <li>- Whistle Blowing Policy</li> </ul> <p>iii) Provide manual record of external complaint cases if Socprog could not be effectively used due to system issue.</p> <ul style="list-style-type: none"> <li>iv) Assign specific contact point for internal complaint receipt in the Grievance Procedure. Focal point shall ensure implementation of complaint management flow chart according to specific the timeline.</li> <li>v) Review current grievance procedure to allow manual record of external complaint, to include possibility of appeal by complainant for internal complaint and includes the option of access to independent legal and technical advice, the ability for complainants to choose individuals or groups to support them and/or act as observers, as well as the option of a third-party mediator. Internal stakeholders should include residents of G10 housing, contractor workforce and foreign workforce.</li> <li>vi) Communicate revised grievance procedure.</li> <li>vii) Conduct annual analysis of internal and external complaint to ensure procedure are implemented accordingly or revise procedure if issues are raised as part of the analysis by end of the year e.g. Socprog issue.</li> </ul>
<p><b>Root Cause Analysis:</b></p>	<ul style="list-style-type: none"> <li>i) The Stakeholders Communication Guideline (GUI NO 01/CRS/MOUILA/0919) Rev. 0 dated 1 September 2019 comprises of various communication SOPs that are owned by different units.</li> <li>ii) Communication of each relevant SOPs to relevant stakeholders are not specified during circulation of new guideline.</li> </ul>
<p><b>Corrective Actions:</b></p>	<ul style="list-style-type: none"> <li>i) Review current grievance procedure to allow manual record of external complaint, to include possibility of appeal by complainant for internal complaint and includes the option of access to independent legal and technical advice, the ability for complainants to choose individuals or groups to support them and/or act as observers, as well as the option of a third-party mediator. Internal stakeholders should include contractor workforce and foreign workforce.</li> <li>ii) Communicate revised procedure (flow chat and contact person) to all internal/ external stakeholders (Delegate, Gender Committee, Community Steering Committee) and display at permanent facilities i.e. biometric center, office and mill.</li> <li>iii) Conduct annual review of all closed and open grievance cases by Director of Human Resources. Summary of cases (total complaint received for past one-year, nature of complaint, total closed case, total open cases) for all sites (Awala, Makouke, Mouila and Ndende) will be provided by Director of Human Resources to OPG Vice President, Deputy Site Head and copied to CRS Regional Manager by end of the year.</li> </ul>
<p><b>Assessment Conclusion:</b></p>	<p>Major NC close out verification:  The newly revised procedure dated 15/1/2020 has been communicated to the relevant stakeholders in lot 1 on 21 and 27 January 2020. The same session was also given at lot 3 for their external stakeholders. Verified records of attendance and acknowledgement for the said session.</p>

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	Based on evidence verification, the NC is found to be effectively closed on 5/2/20 with sufficient evidence of implementation. Continuous implementation will be further verified in the next surveillance audit.
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Non-conformity			
<b>NCR Ref #</b>	1849207-201909-M4	<b>Clause &amp; Category (Major / Minor)</b>	SCCS 5.3.2 Major
<b>Date Issued</b>	25/11/2019	<b>Due Date</b>	22/02/2020
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	05/02/2020
<b>Statement of Nonconformity:</b>	Corrective action plan has yet to be developed with identified root cause analysis and corrective action.		
<b>Requirement Reference:</b>	<p>The site shall have a written procedure to conduct annual internal audit to determine whether the organisation;</p> <ul style="list-style-type: none"> <li>• Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.</li> <li>• Effectively implements and maintains the standard requirements within its organisation. Any non-conformities found as part of the internal audit shall be issued corrective action. The outcomes of the internal audits and all actions taken to correct non-conformities shall be subject to management review at least annually. The organisation shall be able to maintain the internal audit records and reports</li> </ul>		
<b>Objective Evidence:</b>	RSPO & ISCC Action Plan was developed for 3 non-conformities raised during internal audit. The action plan has included details of follow-up action and details of progress. However, there was no root cause analysis and corrective action been identified.		
<b>Corrections:</b>	Revise 2019 internal audit report to include root cause analysis for 3 findings. Update the internal audit report to mill management review committee.		
<b>Root Cause Analysis:</b>	The internal audit procedure defined in SCCS SOP does not include root cause analysis as part of audit template.		
<b>Corrective Actions:</b>	<ul style="list-style-type: none"> <li>i) Review internal audit procedure to define elements required in the internal audit report template.</li> <li>ii) Review internal audit report 2019 to include all elements defined in the procedure. Major NC close out verification: The newly revised SOP for internal audit dated 15/1/20 was verified. Under section 7 (internal audit process: 7.5) has explained on the requirement of root cause analysis in corrective action plan. New reporting template for internal audit report has incorporated the root cause analysis part and action plan.</li> </ul>		
<b>Assessment Conclusion:</b>	<p>Major NC close out verification:</p> <p>The newly revised SOP for internal audit dated 15/1/20 was verified. Under section 7 (internal audit process: 7.5) has explained on the requirement of root cause analysis in corrective action plan. New reporting template for internal audit report has incorporated the root cause analysis part and action plan. Based on evidence verification, the NC is found to be effectively closed on 5/2/20 with sufficient</p>		



	evidence of implementation. Continuous implementation will be further verified in the next surveillance audit.
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Non-conformity			
<b>NCR Ref #</b>	1849207-201909-M5	<b>Clause &amp; Category (Major / Minor)</b>	Indicator 4.1.1 Major
<b>Date Issued</b>	25/11/2019	<b>Due Date</b>	22/02/2020
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	05/02/2020
<b>Statement of Nonconformity:</b>	Human rights policy has yet to be communicated to all levels of the workforce, operations, supply chain and local communities.		
<b>Requirement Reference:</b>	A policy to respect human rights, including prohibiting retaliation against Human Rights Defenders (HRD), is documented and communicated to all levels of the workforce, operations, supply chain and local communities and prohibits intimidation and harassment by the unit of certification and contracted services, including contracted security forces.		
<b>Objective Evidence:</b>	Olam Palm Gabon has established Human Rights Policy approved on 1 September 2019. The policy has not been communicated to the relevant stakeholders such as internal employees and local communities as informed by the Social Responsible and confirmed by interviewed with the local communities.		
<b>Corrections:</b>	<ul style="list-style-type: none"> <li>i) Disseminate and brief Human Rights policy to relevant stakeholders including impacted villages, workers delegate, Gender Committee.</li> <li>ii) Any future update on Olam’s policy will need to be circulated and communicated to relevant stakeholders.</li> </ul>		
<b>Root Cause Analysis:</b>	Updated policies are not communicated to impacted villages, workers delegate, Gender Committee and are not displayed at Olam’s facilities		
<b>Corrective Actions:</b>	<ul style="list-style-type: none"> <li>i) Display updated Human Rights Policy at biometric center, office and mill.</li> <li>ii) Any future update on Olam’s policy will need to be updated in Olam’s new employee’s induction briefing.</li> <li>iii) Any future update on Olam’s policy will need to be circulated to respective stakeholders: <ul style="list-style-type: none"> <li>- Workers delegate</li> <li>- Gender Committee</li> <li>- Impacted villages via community steering committee</li> <li>- Relevant authorities</li> </ul> </li> <li>iv) Updated policies to be briefed to contractor during contract renewal</li> </ul>		
<b>Assessment Conclusion:</b>	Major NC close out verification: Policy briefing was given to external stakeholders (villagers in lot 1 and lot 3 ) on 21 & 27 January 2020 (lot 1) and a few session in January and February 2020. Verified the acknowledgement from the stakeholders for the said session. All related procedures and policies were briefed to the external stakeholders. Based on evidence verification, the NC is found to be effectively closed on 5/2/20 with sufficient evidence of implementation. Continuous implementation will be further verified in the next surveillance audit.		

Non-conformity			
<b>NCR Ref #</b>	1849207-201909-M6	<b>Clause &amp; Category (Major / Minor)</b>	Indicator 6.2.2 Major
<b>Date Issued</b>	25/11/2019	<b>Due Date</b>	22/02/2020
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	11/02/2020
<b>Statement of Nonconformity:</b>	Employment contracts and related documents detailing payments and conditions of employment (e.g. regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. in compliance with national legal requirements) are not properly documented.		
<b>Requirement Reference:</b>	Employment contracts and related documents detailing payments and conditions of employment (e.g. regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. in compliance with national legal requirements) and payroll documents give accurate information on compensation for all work performed, including work done by family members.		
<b>Objective Evidence:</b>	<p>Sampled employment contract for Contrat A Duree Determinee (CDD) found that the period has exceeded 2 years as per the Gabon - Code du travail 1994 as below:</p> <ul style="list-style-type: none"> <li>i. Employee No.: 063292 (joined on 9/1/2018; period: 21/7/2018 – 20/1/2020)</li> <li>ii. Employee No.: 052963 (joined on 9/1/2018; period: 21/7/2018 – 20/1/2020)</li> <li>iii. Employee No.: 052456 (joined on 13/12/2017; period: 21/6/2018 – 20/12/2020)</li> <li>iv. Employee No.: 052058 (joined on 5/12/2017; period: 21/6/2018 – 20/12/2020)</li> <li>v. Employee No.: 052506 (joined on 15/12/2017; period: 21/6/2018 – 20/12/2020)</li> </ul> <p>Document reviewed on the employment contract for contractors' workers found that wages (rate per piece), sick leave, holiday entitlement and maternity leave has yet to be included in the employment contract. Besides, there was no specific fixed-term period for the Contrat A Duree Determinee (CDD) workers stated in the employment contract for contractors' workers. Sampled of the employment contracts as below:</p> <ul style="list-style-type: none"> <li>i. CNSS No.: 001-1118794-4 (Lot 3)</li> <li>ii. CNSS No.: 040-1404488-8 (Lot 3)</li> <li>iii. CNSS No.: 040-1404486-6 (Lot 3)</li> <li>iv. CNSS No.: 040-1404490-0 (Lot 3)</li> <li>v. CNSS No.: 004-1389414-4 (Lot 3)</li> <li>vi. CNSS No.: 004-1388026-6 (Lot 3)</li> <li>vii. CNSS No.: 004-1388511-1 (Lot 3)</li> <li>viii. CNSS No.: 004-1326871-1 (Lot 1)</li> <li>ix. CNSS No.: 004-1327279-9 (Lot 1)</li> <li>x. CNSS No.: 004-1257208-8 (Lot 1)</li> <li>xi. CNSS No.: 004-1285556-6 (Lot 1)</li> </ul>		
<b>Corrections:</b>	<ul style="list-style-type: none"> <li>i) HR/ legal department to advise minimum terms and appropriate language to be included in the contractor workers contracts.</li> <li>ii) Contractor must update will workers contract with above specified elements.</li> </ul>		



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	<ul style="list-style-type: none"> <li>iii) All Olam’s CDD contract will need to specify period of employment i.e. valid for two years upon signing of contract.</li> <li>iv) Changes in the CDD contract to be initial/ sign by respective workers.</li> <li>v) Briefing of new RSPO requirement to HR.</li> </ul>
<b>Root Cause Analysis:</b>	<ul style="list-style-type: none"> <li>i) Contract template Lack of detailed check on each contractor workers contract.</li> <li>ii) Lack of specific fixed-term period in CDD contract.</li> <li>iii) Relevant PIC i.e. HR is not fully aware of new RSPO specified requirements.</li> </ul>
<b>Corrective Actions:</b>	Circulate and explain new RSPO requirements to HR mangers on site.
<b>Assessment Conclusion:</b>	<p>Major NC close out verification:  The template for the new contract of employment has been finalized. Briefing to the contractors were carried out on 18/1/20 (1st meeting) and (2nd session) 3/2/20 to explain of the contract of employment terms and conditions. Verified the new contract signed for contractor's workers.</p> <p>For Olam workers which previously hired under CDD were upgraded to CDI workers category. Verified sample of employment contract signed for (063292, 052058, 052456 and 052506). Briefing session with to HR department was carried out on 16/1/20 on the new RSPO requirements. Based on evidence verification, the NC is found to be effectively closed on 11/2/20 with sufficient evidence of implementation. Continuous implementation will be further verified in the next surveillance audit.</p>

Non-conformity			
<b>NCR Ref #</b>	1849207-201909-M7	<b>Clause &amp; Category (Major / Minor)</b>	Indicator 6.5.1 Major
<b>Date Issued</b>	25/11/2019	<b>Due Date</b>	22/02/2020
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	05/02/2020
<b>Statement of Nonconformity:</b>	The Sexual Harassment in the Workplace Policy is not implemented effectively.		
<b>Requirement Reference:</b>	A policy to prevent sexual and all other forms of harassment and violence is implemented and communicated to all levels of the workforce.		
<b>Objective Evidence:</b>	Based on the interview and review on the complaint forms, it was found that a reported sexual harassment case was resolved but the complainant did not aware on the results of investigation and was not satisfied with the resolution. In this case, the respondent was issued with a warning letter. Furthermore, she is not comfortable to work in the same environment with the respondent. Based on the Sexual Harassment in Workplace Policy, the complainant did not received the report and the action taken has not considered agreement with the parties. Furthermore, after the resolution, there were no further protection to the complainant from exposing to the respondent. As such, the action taken has not demonstrated prevention and repetition of harassment.		
<b>Corrections:</b>	<ul style="list-style-type: none"> <li>i) Provide written communication of action taken to all complainant including sexual harassment case according to the Grievance Procedure.</li> </ul>		

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	<ul style="list-style-type: none"> <li>ii) Action taken to be acknowledged by complainant.</li> <li>iii) Update Internal Grievance Process to include possibility of appeal. If complainant is not satisfied with the action taken, appeal process can be triggered by complainant to recommend for further action e.g. in this case requesting transfer of work location by complainant.</li> </ul>
<b>Root Cause Analysis:</b>	Closure of each sexual harassment cases (all complaint cases) is not communicated and acknowledged by the complainant according to the Grievance Procedure and grievance form template.
<b>Corrective Actions:</b>	<ul style="list-style-type: none"> <li>i) Review current internal grievance procedure to include possibility for appeal and anonymity of the complainant.</li> <li>ii) Conduct annual review of all closed and open grievance cases by Director of Human Resources. Summary of cases (total complaint received for past one-year, nature of complaint, total closed case, total open cases) for all sites (Awala, Makouke, Mouila and Ndende) will be provided by Director of Human Resources to OPG Vice President, Deputy Site Head and copied to CRS Regional Manager by end of the year.</li> </ul>
<b>Assessment Conclusion:</b>	<p>Major NC close out verification:          Newly revised grievance procedure dated 15/1/20 was verified and has included section 7 and 9 for the flow chart on grievance resolution process. On the sexual harassment case, it has been resolved based on the written statement and during interview on site. On annual basis, a review done by HR Director for close and open case. Summary of cases (total complaint received for past one-year, nature of complaint, total closed case, total open cases) for all sites (Awala, Makouke, Mouila and Ndende) will be provided by Director of Human Resources to OPG Vice President, Deputy Site Head and copied to CRS Regional Manager by end of the year.</p> <p>Refer to the latest review done for 2019 for internal and external cases. Based on evidence verification, the NC is found to be effectively closed on 5/2/20 with sufficient evidence of implementation. Continuous implementation will be further verified in the next surveillance audit.</p>

Non-conformity			
<b>NCR Ref #</b>	1849207-201909-M9	<b>Clause &amp; Category (Major / Minor)</b>	Indicator 7.12.4 Major
<b>Date Issued</b>	25/11/2019	<b>Due Date</b>	22/02/2020
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	05/02/2020
<b>Statement of Nonconformity:</b>	Management plan has not been implemented sufficiently.		
<b>Requirement Reference:</b>	Where HCVs, HCS forests after 15 November 2018, peatland and other conservation areas have been identified, they are protected and/or enhanced. An integrated management plan to protect and/or enhance HCVs, HCS forests, peatland and other conservation areas is developed, implemented and adapted where necessary, and contains monitoring requirements. The integrated management plan is reviewed at least once every five years. The integrated		

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	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).
<b>Objective Evidence:</b>	As per the water management plan approved on 27/04/2019, it was stated that water sampling at upstream, in-site and downstream is regularly conducted. However, there was only 1 water sampling conducted in 2018 on 13/06/2018. This is not accordance to the HCV recommendation plan. Another sample was taken from the HCV recommendation plan that to set restoration goal (natural regrowth) for riparian zone with 5 years milestones which are not within the Environment and Social Management Plan dated June 2015.
<b>Corrections:</b>	<ul style="list-style-type: none"> <li>i) Consolidate water test program (treated and surface) for all OPG sites.</li> <li>ii) Communicate annual program with Lebamba laboratory to organize trip to each site to take sample and analyze.</li> </ul>
<b>Root Cause Analysis:</b>	No annual water test program for all sites and water test is conducted as per demand from QEHS (treated water) and CRS (surface water).
<b>Corrective Actions:</b>	<ul style="list-style-type: none"> <li>i) Establish timetable for annual water test program for all sites.</li> <li>ii) Communicate and agree with Lebamba lab on the annual program for lab to organise materials and expertise required.</li> <li>iii) In case of any program change i.e. additional water test, road closure and disruption, delay from external lab, appoint new closet date to complete program and coordinate with onsite CRS manager/ EHS manager and keep MD informed to follow up.</li> </ul>
<b>Assessment Conclusion:</b>	<p>Major NC close out verification:            Communication will Lebamba lab on water testing programme was verified based on email dated 21/12/20. Drinking water analysis will be done by Lebamba lab on monthly basis. External party (SEENEX) will conduct surface water analysis and government lab for POME analysis. Frequency of analysis is one per year.</p> <p>Based on evidence verification, the NC is found to be effectively closed on 5/2/20 with sufficient evidence of implementation. Continuous implementation will be further verified in the next surveillance audit.</p>

Non-conformity			
<b>NCR Ref #</b>	1849207-201909-N1	<b>Clause &amp; Category (Major / Minor)</b>	Indicator 7.8.3 Minor
<b>Date Issued</b>	25/11/2019	<b>Due Date</b>	Next annual surveillance assessment
<b>Closed (Yes / No)</b>	No	<b>Date of nonconformity Closure</b>	"Open"
<b>Statement of Nonconformity:</b>	Discharge quality of mill effluent was not in compliance with the prescribed limit.		
<b>Requirement Reference:</b>	Mill effluent is treated to be in compliance with national regulations. Discharge quality of mill effluent, especially Biochemical Oxygen Demand (BOD), is regularly monitored.		

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<b>Objective Evidence:</b>	BOD for treated effluent analysis result dated 24/9/19 recorded at 8000 mg/l vs prescribed limit of 5,000 mg/l for land irrigation.
<b>Corrections:</b>	Re-conduct POME sampling from final pond and ensure result below 5000ppm.
<b>Root Cause Analysis:</b>	According to Mill SOP section 13 ETP, POME sampling should be despatched immediately after sampling, maintained temperature between 0-10 C to accredited laboratory. However, due to distance of mill and accredited lab located in Libreville, sample despatch could only arrive within a day, maintained in room temperature
<b>Corrective Actions:</b>	<ul style="list-style-type: none"> <li>i) When Lebamba lab is accredited by 2021, POME sample should be sent to nearer lab i.e. Lebamba lab.</li> <li>ii) While location of accredited lab is not possible to access immediately, samples must be sent in a cold box from mill to lab.</li> </ul>
<b>Assessment Conclusion:</b>	Corrective action plan is accepted. Effectiveness of corrective action taken will be further verified in the next audit.

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

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<b>Corrective Actions:</b>	<p>i) Ensure treatment reports on accident cases are submitted to EHS manager for risk assessment on monthly basis.</p> <p>ii) EHS will conduct root cause analysis, risk assessment and follow up action such as training if required.</p> <p>iii) Conduct first aid training to Lot 1 and Lot 3 CDQ and operators at permanent facilities at least two times a year i.e. May 2020 and Oct 2020.</p>
<b>Assessment Conclusion:</b>	Correction action plan is accepted. Effectiveness of corrective action taken will be further verified in the next assessment

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

Non-conformity			
<b>NCR Ref #</b>	1849207-201909-N4	<b>Clause &amp; Category (Major / Minor)</b>	Indicator 2.2.2 Minor

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

<b>Non-conformity</b>			
<b>NCR Ref #</b>	1849207-201909-N5	<b>Clause &amp; Category (Major / Minor)</b>	Indicator 2.2.3 Minor
<b>Date Issued</b>	25/11/2019	<b>Due Date</b>	Next annual surveillance assessment
<b>Closed (Yes / No)</b>	No	<b>Date of nonconformity Closure</b>	"Open"
<b>Statement of Nonconformity:</b>	No clauses disallowing child, forced and trafficked labour mentioned in the contract agreement with contractors.		
<b>Requirement Reference:</b>	All contracts, including those for FFB supply, contain clauses disallowing child, forced and trafficked labour. Where young workers are employed, the contracts include a clause for their protection.		
<b>Objective Evidence:</b>	The sampled contract agreements found that there was no special clauses disallowing child, forced and trafficked labour and where young workers are employed, the contracts include a clause for their protection.		

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	<ul style="list-style-type: none"> <li>i. Contract No.: OPGM/MIR/07/19/R002 Lot 1 for truck rental with driver which valid from 1/7/2019 to 31/12/2019.</li> <li>iii. Contract No.: OPGM/MIR/07/19/L007 Lot 1 for agricultural services which valid from 1/7/2019 to 31/12/2019.</li> <li>iv. Contract No.: OPGM/MIR/07/19/013 Lot 1 for truck rental with driver which valid from 2/9/2019 to 31/12/2019.</li> </ul>
<b>Corrections:</b>	<ul style="list-style-type: none"> <li>i) Review and update current contract template by legal.</li> <li>ii) Renewed contract in Jan 2020 to be based on revised template.</li> </ul>
<b>Root Cause Analysis:</b>	Contract template does not include clauses on meeting applicable legal requirements and other relevant terms according to Olam’s policies such as no child labour, no trafficked labour, no forced labour
<b>Corrective Actions:</b>	Sign new contract in Jan with contractors based on new template approved by legal department. Briefing of new contract during signature of contract.
<b>Assessment Conclusion:</b>	Correction action plan is accepted. Effectiveness of corrective action taken will be further verified in the next assessment



Non-conformity			
<b>NCR Ref #</b>	1849207-201909-N6	<b>Clause &amp; Category (Major / Minor)</b>	Indicator 4.2.2 Minor
<b>Date Issued</b>	25/11/2019	<b>Due Date</b>	Next annual surveillance assessment
<b>Closed (Yes / No)</b>	No	<b>Date of nonconformity Closure</b>	"Open"
<b>Statement of Nonconformity:</b>	Procedure of Management of Complaints and Claims was not implemented effectively.		
<b>Requirement Reference:</b>	Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties.		
<b>Objective Evidence:</b>	<p>Procedure of Management of Complaints and Claims with Doc. No.: SOP N07/CRS/Mouila/ 0119, Ver. 02 dated January 2019 was developed. However, reviewed on the complaint forms received in Lot 1 on 30/8/2019 and 11/10/2019 were not registered in the SocProg software within the set timeframe as per SOP.</p> <p>In Moutassou Lot 3, there was a complaint received on 18/10/2019 from one of the driver related to the potential discrimination by the Manager. However, there was no evidence to show that the call-up meeting with the complainant was done within 2 days and no investigation could be taken without the call-up meeting with the complainant. The complaint is still open and unresolved.</p>		
<b>Corrections:</b>	Assign specific contact point for internal and external complaint receipt in the Grievance Procedure. Focal point shall ensure implementation of complaint management flow chart according to specific the timeline.		
<b>Root Cause Analysis:</b>	<p>i) Complaint management for external and internal stakeholders are not followed according to the Grievance Procedure.</p> <p>ii) Awareness of stakeholder on complaint process i.e. complaint form/ complaint process is lacking.</p>		
<b>Corrective Actions:</b>	<p>i) Review current grievance procedure to allow manual record of external complaint, to include possibility of appeal by complainant for internal complaint and includes the option of access to independent legal and technical advice, the ability for complainants to choose individuals or groups to support them and/or act as observers, as well as the option of a third-party mediator. Internal stakeholders should include contractor workforce and foreign workforce.</p> <p>ii) Communicate revised procedure (flow chat and contact person) to all internal/ external stakeholders (Delegate, Gender Committee, Community Steering Committee) and display at permanent facilities i.e. biometric center, office and mill.</p> <p>iii) Conduct annual review of all closed and open grievance cases by Director of Human Resources and CRS support team. Summary of cases (total complaint received for past one-year, nature of complaint, total closed case, total open cases) for all sites (Awala, Makouke, Mouila and Ndende) will be provided by Director of Human Resources to OPG Vice President, Deputy Site Head and respective CRS managers by end of the year.</p>		



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<b>Assessment Conclusion:</b>	Correction action plan is accepted. Effectiveness of corrective action taken will be further verified in the next assessment
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Non-conformity			
<b>NCR Ref #</b>	1849207-201909-N7	<b>Clause &amp; Category (Major / Minor)</b>	Indicator 4.2.3 Minor
<b>Date Issued</b>	25/11/2019	<b>Due Date</b>	Next annual surveillance assessment
<b>Closed (Yes / No)</b>	No	<b>Date of nonconformity Closure</b>	"Open"
<b>Statement of Nonconformity:</b>	Grievance mechanism was not implemented effectively.		
<b>Requirement Reference:</b>	The unit of certification keeps parties to a grievance informed of its progress, including against agreed timeframe and the outcome is available and communicated to relevant stakeholders.		
<b>Objective Evidence:</b>	<p>During the interview with villagers, it was informed that there are elephant attack on their crops. Such grievance has been informed to OPG CRS team. However there are no records found of such grievance. CRS team informed the assessment team that these shall be managed by the Authorities. Despite that it shall be managed by the Authorities, OPG has not able to demonstrate the execution of dealing with complaints or grievances received.</p> <p>Furthermore, the assessment team during Mboukou housing visit found that one of the florescent light in the living room was not in place and water-tap in the toilet was leaking. Interviewed with the residents informed that these issues happened and has reported to CDQ since 8 months ago. However, no evidence to show that the complaint has been documented and entertained.</p> <p>In addition, interviewed with the local community in Mboukou Village confirmed that no communication/ update on the status and progress of the complaint related to the dead fish in the trenches. A proactive solution shall be taken by the company rather than awaiting for resolution.</p> <p>One of the complainant of sexual harassment in Mboukou informed that she has reported to her superior (Doctor) on the safety issue of one female nurse to work a night shift. Cross-check with HR Manager confirmed that this issue has been raised. No evidence to show that the complaint has been documented and entertained.</p>		
<b>Corrections:</b>	Assign specific contact point for internal and external complaint receipt in the Grievance Procedure. Focal point shall ensure implementation of complaint management flow chart according to specific the timeline.		
<b>Root Cause Analysis:</b>	<p>i) Complaint management for external and internal stakeholders are not followed according to the Grievance Procedure.</p> <p>ii) Awareness of stakeholder on complaint process i.e. complaint form/ complaint process is lacking.</p>		
<b>Corrective Actions:</b>	i) Review current grievance procedure to allow manual record of external complaint, to include possibility of appeal by complainant for internal complaint and includes the option of access to independent legal and technical advice, the ability for complainants to choose individuals or groups to support them and/or act as observers, as well as the option of a third-party mediator. Internal stakeholders		

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

Non-conformity			
<b>NCR Ref #</b>	1849207-201909-N8	<b>Clause &amp; Category (Major / Minor)</b>	Indicator 4.2.4 Minor
<b>Date Issued</b>	25/11/2019	<b>Due Date</b>	Next annual surveillance assessment
<b>Closed (Yes / No)</b>	No	<b>Date of nonconformity Closure</b>	"Open"
<b>Statement of Nonconformity:</b>	The conflict resolution mechanism includes the option of access to independent legal and technical advice, the ability for complainants to choose individuals or groups to support them and/or act as observers, as well as the option of a third-party mediator was not clearly outline.		
<b>Requirement Reference:</b>	The conflict resolution mechanism includes the option of access to independent legal and technical advice, the ability for complainants to choose individuals or groups to support them and/or act as observers, as well as the option of a third-party mediator.		
<b>Objective Evidence:</b>	Olam fully supports the United Nations Global Compact's (UNGC) Guiding Principles on Business and Human Rights and commits to promote best practice throughout our activities as written in the Human Rights Policy. However, it is not clearly outline in the Human Rights Policy which made reference to the Guiding Principles on Business and Human Rights.		
<b>Corrections:</b>	<ul style="list-style-type: none"> <li>i) Assign specific contact point for internal and external complaint receipt in the Grievance Procedure. Focal point shall ensure implementation of complaint management flow chart according to specific the timeline.</li> <li>ii) Review current grievance procedure to allow manual record of external complaint and to include possibility of appeal by complainant for internal complaint and option of access to independent legal and technical advice, the ability for complainants to choose individuals or groups to support them and/or act as observers, as well as the option of a third-party mediator.</li> <li>iii) Communicate revised grievance procedure.</li> <li>iv) Conduct annual analysis of internal and external complaint to ensure procedure are implemented accordingly or revise procedure if issues are raised as part of the analysis by end of the year e.g. Socprog issue.</li> </ul>		
<b>Root Cause Analysis:</b>	<ul style="list-style-type: none"> <li>i) New requirement is indirectly stated in Human Rights Policy and not clearly spell out in the grievance procedure.</li> <li>ii) Complaint management for external and internal stakeholders are not followed according to the Grievance Procedure.</li> <li>iii) Awareness of stakeholder on complaint process i.e. complaint form/ complaint process is lacking.</li> </ul>		
<b>Corrective Actions:</b>	<ul style="list-style-type: none"> <li>i) Review current grievance procedure to allow manual record of external complaint and to include possibility of appeal by complainant for internal complaint. Internal stakeholders should include contractor workforce and foreign workforce.</li> <li>ii) Review current grievance procedure to allow manual record of external complaint and to include possibility of appeal by complainant for internal complaint and option of access to independent legal and technical advice, the ability for complainants to choose individuals or groups to support them and/or act as observers, as well as the option of a third-party mediator.</li> </ul>		

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

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Non-conformity			
<b>NCR Ref #</b>	1849207-201909-N9	<b>Clause &amp; Category (Major / Minor)</b>	Indicator 6.2.7 Minor
<b>Date Issued</b>	25/11/2019	<b>Due Date</b>	Next annual surveillance assessment
<b>Closed (Yes / No)</b>	No	<b>Date of nonconformity Closure</b>	"Open"
<b>Statement of Nonconformity:</b>	Temporary labours are used for all core work in the plantations and mill.		
<b>Requirement Reference:</b>	Permanent, full-time employment is used for all core work performed by the unit of certification. Casual, temporary and day labour is limited to jobs that are temporary or seasonal.		
<b>Objective Evidence:</b>	Document reviewed on the employment contracts of the workers with Contrat A Duree Determinee (CDD) – Fixed Term Employment (Temporary workers as defined by ILO) are performing core work such as harvesting, manuring, spraying and mill operators.		
<b>Corrections:</b>	Gabon NI is in-progress and yet to specify relevant context in Gabon and West Africa based on RSPO new P&C 2018.		
<b>Root Cause Analysis:</b>	Collaborate with Gabon NI to ensure CDD according Code due Travail is permitted in national context for all activities.		
<b>Corrective Actions:</b>	Ensure inputs delivered to Gabon NI Task Force to include interpretation of indicator 6.2.7 and new P&C based on Gabon context.		
<b>Assessment Conclusion:</b>	Correction action plan is accepted. Effectiveness of corrective action taken will be further verified in the next assessment		

Non-conformity			
<b>NCR Ref #</b>	1849207-201909-N10	<b>Clause &amp; Category (Major / Minor)</b>	Indicator 6.3.2 Minor
<b>Date Issued</b>	25/11/2019	<b>Due Date</b>	Next annual surveillance assessment
<b>Closed (Yes / No)</b>	No	<b>Date of nonconformity Closure</b>	"Open"
<b>Statement of Nonconformity:</b>	Minutes of meetings between the unit of certification with trade unions or workers representatives, who are freely elected, are not made available during the time of audit.		
<b>Requirement Reference:</b>	Minutes of meetings between the unit of certification with trade unions or workers representatives, who are freely elected, are documented in national languages and made available upon request.		
<b>Objective Evidence:</b>	There was an ad-hoc meeting conducted on 21/10/2019 and monthly meeting with management on 31/10/2019. However, meeting minutes for these two meetings were not retained by the company and was not available during the audit.		

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<b>Corrections:</b>	i)Prepare internal minutes of meeting with Delegate. ii)Communicate and share a copy of minutes of meeting with Delegate in next meeting
<b>Root Cause Analysis:</b>	Meeting minutes with Delegate are not prepared after each meeting.
<b>Corrective Actions:</b>	Circulate minutes of meeting with Delegate in next meeting, one agenda is set to review previous minutes.
<b>Assessment Conclusion:</b>	Correction action plan is accepted. Effectiveness of corrective action taken will be further verified in the next assessment

Non-conformity			
<b>NCR Ref #</b>	1849207-201909-N11	<b>Clause &amp; Category (Major / Minor)</b>	Indicator 2.1.2 Minor
<b>Date Issued</b>	25/11/2019	<b>Due Date</b>	Next annual surveillance assessment
<b>Closed (Yes / No)</b>	No	<b>Date of nonconformity Closure</b>	"Open"
<b>Statement of Nonconformity:</b>	Monitoring of legal compliances of contractors are not sufficient.		
<b>Requirement Reference:</b>	A documented system for ensuring legal compliance is in place. This system has a means to track changes to the law and also includes listing and evidence of legal due diligence of all contracted third parties, recruitment agencies, service providers and labour contractors.		
<b>Objective Evidence:</b>	During the daily opening meeting on 23/11/2019 for assessment at Lot 1, it was informed that there are trucks transferring workers could not make it to the estate and have to return due to potentially the contractors managing the transfer have not paid Patent Tax. Interview with Olam personnel shows that there is no monitoring if the contractor are meeting the legal requirements of paying the required taxes whereas this particular clause is within the contract. As a consequent of not able to monitor this requirement, workers have missed their work opportunity for the day.		
<b>Corrections:</b>	i) Compile all relevant papers during signing of contract in Jan 2020. ii) Ensure full compliance of contractors.		
<b>Root Cause Analysis:</b>	i) Monitoring of contractors' legal compliance are conducted by legal department through independent body (AIC) on annual basis but recent legal audit was conducted during week of 11th November 2019 and report is yet to be finalised. ii) Monthly contractors monitoring does not include paper legal compliance. iii) Complete paper legal compliance is not compiled during signing of contract.		
<b>Corrective Actions:</b>	i) Obtain 2019 legal audit findings and take follow up actions on contractors by Q1 2020. ii) Suspend non complying contractors according to legal audit findings and monthly HR contractors monitoring recommendation.		
<b>Assessment Conclusion:</b>	Correction action plan is accepted. Effectiveness of corrective action taken will be further verified in the next assessment		

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Non-conformity			
<b>NCR Ref #</b>	1849207-201909-N12	<b>Clause &amp; Category (Major / Minor)</b>	Indicator 4.4.6 Minor
<b>Date Issued</b>	25/11/2019	<b>Due Date</b>	Next annual surveillance assessment
<b>Closed (Yes / No)</b>	No	<b>Date of nonconformity Closure</b>	"Open"
<b>Statement of Nonconformity:</b>	Implementation of the agreed FPIC negotiation was not carried sufficiently.		
<b>Requirement Reference:</b>	There is evidence that implementation of agreements negotiated through FPIC is annually reviewed in consultation with affected parties.		
<b>Objective Evidence:</b>	The management plan to execute all outstanding social contract or those amendments to the social contract are not documented with timeframe to complete and agreed with the affected parties. The social contract execution was also highlighted by the Mouila Prefect that it is outdated and poor in execution.		
<b>Corrections:</b>	Update of social contract to include annual program 2020 timeline and deliverables.		
<b>Root Cause Analysis:</b>	Social contract finalised without mention of expected delivery timeline according to budget and availability/ capability of local contractors to complete all infrastructure		
<b>Corrective Actions:</b>	<ul style="list-style-type: none"> <li>i) Prepare 2020 annual program for social contract implementation.</li> <li>ii) Communicate programme to with impacted villages via Community Steering Committee.</li> </ul>		
<b>Assessment Conclusion:</b>	Correction action plan is accepted. Effectiveness of corrective action taken will be further verified in the next assessment		

Non-conformity			
<b>NCR Ref #</b>	1849207-201909-N13	<b>Clause &amp; Category (Major / Minor)</b>	Indicator 4.8.4 Minor
<b>Date Issued</b>	25/11/2019	<b>Due Date</b>	Next annual surveillance assessment
<b>Closed (Yes / No)</b>	No	<b>Date of nonconformity Closure</b>	"Open"
<b>Statement of Nonconformity:</b>	Mechanism to resolve land conflict and dispute is not sufficiently documented.		
<b>Requirement Reference:</b>	For any conflict or dispute over the land, the extent of the disputed area is mapped out in participatory way with involvement of affected parties (including neighbouring communities where applicable)		
<b>Objective Evidence:</b>	Despite there was no land dispute identified in this assessment, there was no specific resolution mechanism for land conflict or dispute especially documented		



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	mechanism including participatory mapping involving affected parties. The Complaints and complaints management procedure dated January 2019 does not provide sufficient guidance.
<b>Corrections:</b>	Olam Palm Gabon is developed based on full compliance to the RSPO New Planting Procedures which include FPIC and participatory mapping with relevant stakeholders. At the time of audit, there is no land conflict within certification units i.e. Lot 1 and Lot 3 to demonstrate compliance of this requirement. However, OPG also does not have a specific SOP on land conflict resolution in case of any land conflict issue.
<b>Root Cause Analysis:</b>	Develop a specific SOP on land conflicts resolution to include participatory mapping of the disputed area with involvement of affected parties (including neighbouring communities where applicable).
<b>Corrective Actions:</b>	Communicate and share the specific land resolution SOP with the communities.
<b>Assessment Conclusion:</b>	Correction action plan is accepted. Effectiveness of corrective action taken will be further verified in the next assessment

Non-conformity			
<b>NCR Ref #</b>	1849207-201909-N14	<b>Clause &amp; Category (Major / Minor)</b>	Indicator 7.3.1 Minor
<b>Date Issued</b>	25/11/2019	<b>Due Date</b>	Next annual surveillance assessment
<b>Closed (Yes / No)</b>	No	<b>Date of nonconformity Closure</b>	"Open"
<b>Statement of Nonconformity:</b>	This is a repeated NC from previous assessment. Waste management are not sufficiently carried out.		
<b>Requirement Reference:</b>	A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented.		
<b>Objective Evidence:</b>	<p>During field assessment at the waste collection centres / landfills, it was observed that hazardous waste has been stored and not able to be disposed yet as per the management plan. Despite of actions have been started, the management plan shall be revised with specific time commitment as this has already be an issue.</p> <p>It was further observed that in Lot 1 workshop, the secondary containment of the waste oil have not installed valve to contained any spillage of the oil. The current installation is directly discharge to the oil trap which is not be sufficient to contain the volume of the waste oil tank</p>		
<b>Corrections:</b>	<ul style="list-style-type: none"> <li>i) Biannual waste reduction, recycling, reusing, and disposal awareness campaign at all G10 housing and at onsite school.</li> <li>ii) Educate residents and kids at school to separate organic vs non organic waste (plastic, paper, glass, tin) in two separate bags at home.</li> <li>iii) Specific attention given to housing residents and circulate do and don't when staying on site.</li> <li>iv) Review waste management strategy according to local context e.g. triple rinse plastic chemical container</li> </ul>		

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	and shred; install valve for waste oil containments. Revised strategy to be validated by EHS head.
<b>Root Cause Analysis:</b>	Waste reduction, recycling, reusing, and disposal awareness and system is lacking and generally overall in Gabon context. There is no availability of proper collectors for hazardous waste in Gabon.
<b>Corrective Actions:</b>	<ul style="list-style-type: none"> <li>i) Conduct annual cleaning around G10 housing and / or provide annual award to cleanest G10 housing site.</li> <li>ii) Review waste management strategy.</li> </ul>
<b>Assessment Conclusion:</b>	Correction action plan is accepted. Effectiveness of corrective action taken will be further verified in the next assessment

Non-conformity			
<b>NCR Ref #</b>	1849207-201909-N15	<b>Clause &amp; Category (Major / Minor)</b>	Indicator 7.3.2 Minor
<b>Date Issued</b>	25/11/2019	<b>Due Date</b>	Next annual surveillance assessment
<b>Closed (Yes / No)</b>	No	<b>Date of nonconformity Closure</b>	"Open"
<b>Statement of Nonconformity:</b>	Understanding of waste disposal is lacking.		
<b>Requirement Reference:</b>	Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.		
<b>Objective Evidence:</b>	Disposal of waste is still not yet fully understood by workers and managers: 1. Implementation of waste segregation and awareness of domestic waste disposal/collection at housing camps are still lacking. 2. Estate 15 (near to plot V110), it was found to have an abandon waste site. 3. Found reuse of chemical container as seat at Mboukou housing area.		
<b>Corrections:</b>	<ul style="list-style-type: none"> <li>i) Biannual waste reduction, recycling, reusing, and disposal awareness campaign at all G10 housing and at onsite school.</li> <li>ii) Specific attention given to housing residents and circulate do and don't when staying on site.</li> </ul>		
<b>Root Cause Analysis:</b>	Waste reduction, recycling, reusing, and disposal awareness and system is lacking and generally overall in Gabon context.		
<b>Corrective Actions:</b>	<ul style="list-style-type: none"> <li>i) Educate residents and kids at school to separate organic vs non organic waste (plastic, paper, glass, tin) in two separate bags at home.</li> <li>ii) Circulate memo to all residents of G10 housing on do and don't e.g. no storage/ use of chemical container at home.</li> <li>iii) Conduct annual cleaning around G10 housing and/ or provide annual award to cleanest G10 housing site.</li> </ul>		
<b>Assessment Conclusion:</b>	Correction action plan is accepted. Effectiveness of corrective action taken will be further verified in the next assessment		

Opportunity for Improvements	
OFI #	Description
OFI 1	<p><b>1849207-201909-I1</b></p> <p><b>Indicator 6.2.6</b>  <b>Details:</b>            Acknowledge that the calculation of prevailing wages was only published 1 week before the assessment, hence the remaining in-kind benefit e.g. water supply and the medical expenses provided by the company to the workers to be included.</p>
OFI 2	<p><b>1849207-201909-M8 (drop to OFI based on BSI's appeal panel decision dated 17/1/20)</b></p> <p><b>Indicator 3.4.3</b>  <b>Details:</b>            At the time of the assessment, there were insufficient baseline data which does not allowed Olam to have comprehensive EIA. However, Olam needs to update its management plan to consider the extensive rainy season</p>

Positive Findings	
PF #	Description
PF 1	Good commitment from the management team
PF 2	CIP, budget and CAPEX allocation
PF 3	OPG has demonstrate shared responsibility where by the implementation of RSPO P&C has also extended to the Kernel Crushing Plant.
PF 4	Drone system for aerial surveillance (pest and disease, fire incident)

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

Non-conformity			
<b>NCR Ref #</b>	1712399-201611-M1	<b>Clause &amp; Category (Major / Minor)</b>	Indicator 4.7.3 Major
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	20/02/2019
<b>Statement of Nonconformity:</b>	Workplace safety, PPE compliance and monitoring of effectiveness implementation is not adequate.		
<b>Requirement Reference:</b>	All workers involved in the operation shall be adequately trained in safe working practices (see Criterion 4.8). Adequate and appropriate protective equipment shall be available to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations and land preparation, harvesting and if it is used, burning.		

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<p><b>Objective Evidence:</b></p>	<ul style="list-style-type: none"> <li>a) Noticed 1 contractor worker conducting grading &amp; unloading of FFB from the lorry at the receiving platform without wearing safety helmet. Another worker (truck driver) was found supervising the unloading of FFB activity with wearing slipper and smoking at the receiving platform.</li> <li>b) On site safety inspection on a backhoe in operation found that the safety seat belt, steering horn, back head light &amp; break light were not functioning. Interview session with the backhoe operator indicate that he performs daily visual safety inspections. However, the backhoe operator was not aware that the daily Tractor Safety Checklist was to be used for recording the safety inspection to be carried out as per Procedure of Agriculture Tractor Management, Doc. No. OPG-MLA-EHS-SOP-08. Further follow up interview session with the QSHE team indicate that the backhoe operator competency was determined by his previous employment competency certificate and there was no formal training been provided to the backhoe operator especially on the Olam’s Agriculture Tractor Management safe work procedure.</li> <li>c) PPE issuance record for eye protection was not available for the sampled manuring field workers at Lot 3 Estate 11. Information on Kieserite Material Safety Data Sheet indicate that eye protection to be provided when handling with the chemical/fertilizer.</li> </ul>
<p><b>Corrective Actions:</b></p>	<ul style="list-style-type: none"> <li>1. Policy briefing to all existing contractors and to new contractors upon signing of contract. Contractors performance rating has included safety compliance performance, non-performing contractors. As per the contract, contract will be sanction according to the Sanction Procedure which is stated within the contract and findings to be included as part of the evaluation during contract renewal.</li> <li>2. All workers including workers from other OPG’s sites must complete Safety Induction. HR shall inform EHS team and request induction upon preparation of new worker’s contract.</li> <li>3. Minimal yearly review of chemical used on sites and update PPE requirements according to the MSDS. Latest list of chemical and appropriate PPE was circulated to the Safety Committee for further communication. In case of procurement of new chemical (i.e. referring to new active ingredient which is not from existing system record, not referring to new brand or new supplier), Procurement team shall seek opinion from head of EHS prior to making order of new chemical to ensure policy compliance (e.g. no paraquat, no WHO I etc.).</li> </ul>
<p><b>Assessment Conclusion:</b></p>	<p>ASA2 verification:</p> <ul style="list-style-type: none"> <li>1) Policy briefing to contractors was carried out on 5/11/19. Monitoring of contractor was done by EHS team and status of any violation is reported in Weekly ESH report. Report for week 46 (S46) is referred to. There are summary violation and sanction issued to the contractor based on the report.</li> <li>2) Safety induction was done for every workers that newly hired by Olam. Training records dated 5/11/19 is referred to.</li> <li>3) Review of chemical used based on latest chemical register dated 11/10/19 is referred to. No new chemical used by OLAM and no changes on the PPE matrix for the usage recommendation.</li> </ul> <p>Based on the above verification, no recurrence of issues found during this audit. The major NC is remained closed.</p>

Non-conformity			
<b>NCR Ref #</b>	1712399-201611-M2	<b>Clause &amp; Category (Major / Minor)</b>	Indicator Major 6.5.2
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	The issue is raise under the new indicator of RSPO P&C 2018.
<b>Statement of Nonconformity:</b>	Information in the employment contracts does not clearly details the service of contract.		
<b>Requirement Reference:</b>	Labour laws, union agreements or direct contracts of employment detailing payments and conditions of employment (e.g. working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc.) shall be available in the languages understood by the workers or explained carefully to them by a management official		
<b>Objective Evidence:</b>	<p>1) The job title stated in the mill general workers are still plantation workers despite they have been transferred to mill. Sample reviewed - Moussoulou Ney Gildas; Mewono; Pissa Jean Pierre.</p> <p>2) The job title after renewal of contract of plantation workers in Lot 3 does not specifically state the job title. It is only stated as OE1AA. Sample reviewed - Bounoundou Angelique re-contracted on 10/06/2018; Manga Valerie re-contracted on 10/05/2018;</p> <p>3) The Indonesia foreign worker contract does not include an appropriate exit clause (e.g. period of notice, acceptable reason of exiting) if the workers decide to return home without completing the contract. Furthermore in the contract there is no stated information on the working days, working hours, holiday entitlement, sick leave and does not reference to any labor law.</p> <p>4) The CNSS number for Tsangou and Kassa is available. However the payment system is not updated.</p>		
<b>Corrective Actions:</b>	<p>1. Contract renewal process has defined with specified conditions that can trigger a contract revision e.g. promotion, new job scope.</p> <p>2. During application of CNSS for workers, HR shall inform workers on potential delay of CNSS enrollment by relevant authority and communicate latest status of CNSS application result from time to time through their delegate.</p> <p>3. Annual external legal audit (i.e. labour law checklist) has included review of contract template for national or foreign workforce as part of the legal audit. Findings from external legal review (if any) to be addressed as part of the RSPO monthly action plan</p>		
<b>Assessment Conclusion:</b>	<p>ASA2 verification:</p> <p>Continuous implementation was not effectively demonstrated thus the issue is raise under the new indicator of RSPO P&amp;C 2018 under indicator 6.2.2</p>		

Non-conformity			
<b>NCR Ref #</b>	1712399-201611-M3	<b>Clause &amp; Category (Major / Minor)</b>	Indicator 6.3.2 Major
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	20/02/2019

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<b>Statement of Nonconformity:</b>	Documentation of both the process by which a dispute was resolve and the outcome shall be available.
<b>Requirement Reference:</b>	There is not specific timeline to resolve internal grievances.
<b>Objective Evidence:</b>	The Procedure de Gestions Des Plaintes et Reclamations has not considered resolution timeline for internal grievance. Reviewing the grievance logbook for Mouila Lot 3 did not clearly indicate the date of resolution and the acceptance of the resolution by the complainant.
<b>Corrective Actions:</b>	1. Procedure de Gestions Des Plaintes et Reclamations has been aligned to Olam's Grievance Protocol i.e. with timeline, acknowledgement by complainant on case closure and protection for anonymous submission. 2. The revised procedure and update delegate was been communicated.
<b>Assessment Conclusion:</b>	ASA2 verification: Continuous implementation was not effectively demonstrated thus the issue is raise under the new indicator of RSPO P&C 2018 under indicator 4.2.3

Non-conformity			
<b>NCR Ref #</b>	1712399-201611-M4	<b>Clause &amp; Category (Major / Minor)</b>	Indicator 5.6.1 Major
<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	20/02/2019
<b>Statement of Nonconformity:</b>	Information on the RSPO certified products are not available.		
<b>Requirement Reference:</b>	The supplying site shall ensure that the following minimum information for RSPO certified products is made available in document form. <ul style="list-style-type: none"> <li>• A unique identification number</li> <li>• Supply chain certificate number of the seller</li> </ul>		
<b>Objective Evidence:</b>	The certificate number used in the mill delivery note is not according to the certificate number. The certificate number is RSPO 671034. There is no unique identification number shown in the delivery note.		
<b>Corrective Actions:</b>	1. The Supply Chain SOP was revised to incorporate the RSPO certificate number specifically into the sales contract of certified products. 2. Upcoming annual internal audit on SCCS to ensure DN are match to each batch of delivery process on SAP.		
<b>Assessment Conclusion:</b>	ASA2 verification: Verified the new updated procedure, RSPO Supply Chain & Traceability (Mass Balance Model), ref: POM-SC/MB001, rev:4 dated 1/11/19. Based on latest internal audit dated 5/7/19, DN are checked and matched to each batch of delivery process on SAP. No repeated issue found and the previous NC is remain closed.		

Non-conformity			
<b>NCR Ref #</b>	1712399-201611-M5	<b>Clause &amp; Category (Major / Minor)</b>	Indicator 5.11.1 Major

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<b>Closed (Yes / No)</b>	Yes	<b>Date of nonconformity Closure</b>	20/02/2019
<b>Statement of Nonconformity:</b>	The palm Trademark use without license number.		
<b>Requirement Reference:</b>	<p>The site shall only make claims regarding the use of support of RSPO certified oil palm products that are in compliance with the RSPO Rules on Market Communications and Claims. Members are allowed to use the RSPO label in one of the following ways:</p> <ul style="list-style-type: none"> <li>Wherever the RSPO trademark is displayed, the applicable trademark license number must be shown immediately under or next to the trademark or the 'statement'. Font must be Calibri, font size must be at least 4 pt (1.4 mm or 0.6 inch).</li> </ul>		
<b>Objective Evidence:</b>	In the delivery note of CPO and PK of Bilala Palm Oil Mill, it has promoted the RSPO trademark logo and the RSPO membership (especially for the sales on conventional or uncertified material). However there is no license number accompanied with it.		
<b>Corrective Actions:</b>	The Supply Chain SOP was revised to include internal audit on usage of the RSPO Trademark and RSPO Rules of Communication		
<b>Assessment Conclusion:</b>	<p>ASA2 verification:</p> <p>Verified the new updated procedure, RSPO Supply Chain &amp; Traceability (Mass Balance Model), ref: POM-SC/MB001, rev:4 dated 1/11/19. No use of trademark on delivery note. No repeated issue found and the previous NC is remain closed.</p>		

Non-conformity			
<b>NCR Ref #</b>	1712399-201611-N1	<b>Clause &amp; Category (Major / Minor)</b>	Indicator 4.7.5 Minor
<b>Closed (Yes / No)</b>	No	<b>Date of nonconformity Closure</b>	Raise under the new indicator of RSPO P&C 2018.
<b>Statement of Nonconformity:</b>	Lot 3: Estate 12 Landfill - First aid equipment and the assigned trained first aider was not available at worksite.		
<b>Requirement Reference:</b>	<p>Accident and emergency procedures shall exist and instructions shall be clearly understood by all workers. Accident procedures shall be available in the appropriate language of the workforce. Assigned operatives trained in First Aid should be present in both field and other operations, and first aid equipment shall be available at worksites. Records of all accidents shall be kept and periodically reviewed</p>		
<b>Objective Evidence:</b>	There was no first aid kit (including clean water for emergency washing purpose) was provided at the landfill worksite. Further verification indicate that there was no trained first aider at the landfill worksite.		
<b>Corrective Actions:</b>	Implement annual first aid training to selective workers to ensure presence of first aider at all field and operation areas. Establish document control of all safety procedures to include timely review of these document based on actual site situation and needs		
<b>Assessment Conclusion:</b>	ASA2 verification:		



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	The previous minor NC is not effectively closed and raise under the new indicator of RSPO P&C 2018 under indicator 6.7.2
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Non-conformity			
<b>NCR Ref #</b>	1712399-201611-N2	<b>Clause &amp; Category (Major / Minor)</b>	Indicator 5.3.3 Minor
<b>Closed (Yes / No)</b>	No	<b>Date of nonconformity Closure</b>	Raise under the new indicator of RSPO P&C 2018.
<b>Statement of Nonconformity:</b>	Lot 3: Estate 12 - Waste management and disposal plan to avoid or reduce pollution was not implemented adequately.		
<b>Requirement Reference:</b>	A waste management and disposal plan to avoid or reduce pollution shall be documented		
<b>Objective Evidence:</b>	Chemical spill response material (fibre materials) was available at the Chemical Store & Lubricant Oil Storage Drums at the Workshop. However, appropriate tools to clean up the contaminated fibres was not provided at the above workstations.		
<b>Corrective Actions:</b>	<ol style="list-style-type: none"> <li>1. Review and update existing waste management and disposal plan in terms of emergency preparedness which is covering all the workstation include new facilities.</li> <li>2. Provide schedule of training and refresher training on emergency preparedness procedure and implement as per schedule.</li> <li>3. Monitoring and annual internal audit to ensure all the workstation complying to the waste management and disposal plan including emergency response preparedness.</li> <li>4. Repeat external and internal awareness training and briefing on waste management and disposal plan including emergency preparedness to all workers on yearly basis, next scheduled training to focus on emergency preparedness and safe handling of contaminated material.</li> </ol>		
<b>Assessment Conclusion:</b>	ASA2 verification: The previous minor NC is not effectively closed and raise under the new indicator of RSPO P&C 2018 under indicator 7.3.1		

Opportunity for Improvement	
OFI#	Description
<b>OFI 1</b>	<p><b>1712399-201611-I1</b>  <b><u>Indicator 6.2.3</u></b>            Requirement :            A list of stakeholders, records of all communication, including confirmation of receipt and that efforts are made to ensure understanding by affected parties, and records taken in response to input from stakeholders, shall be maintained.</p> <p>Details :</p>



	<p>It is acknowledge by the assessment team that effort of communication with the communities has been carried out. However, information received from the communities varies. The effectiveness of the communication to be further improved.</p> <p>ASA2 status: Communication is still yet to further improved. Refer to NC raised under indicator 1.1.4.</p>
<b>OFI 2</b>	<p><b>1712399-201611-I2</b> <b><u>Indicator 6.9.1</u></b></p> <p>Requirement : A policy to prevent sexual and all other forms of harassment and violence shall be implemented and communicated to all levels of the workforce.</p> <p>Details : Grievance of sexual harassment are recorded and managed. However, the implementation of awareness and education program to be further enhanced.</p> <p>ASA2 status: Awareness and education programme was carried out in the annual SOP and policy in the beginning of year.</p>
<b>OFI 3</b>	<p><b>1712399-201611-I3</b> <b><u>Indicator 5.8.2</u></b></p> <p>Requirement : Appropriate training shall be provided by the organization for personnel carrying out the tasks critical to the effective implementation of the supply chain certification standard requirements.</p> <p>Details : Training shall be specific and relevant to the task(s) performed. Training of the weighbridge operators to be further enhanced.</p> <p>ASA2 status: Training for weighbridge operator was included together during RSPO P&amp;C 2018 training on 26/10/19</p>

### 3.4.2 Summary of the Nonconformities and Status

CAR Ref.	Category (Major / Minor)	P&C Indicator	Issued Date	Status & Date (Closure)
1562544-201709-N1	Minor	5.1.3	24/11/2017	22/11/2018
1712399-201611-M1	Major	4.7.3	29/11/2018	Closed out on 10/02/2019
1712399-201611-M2	Major	6.5.2	29/11/2018	Re-issue under the new indicator of RSPO P&C 2018.
1712399-201611-M3	Major	6.3.2	29/11/2018	Re-issue under the new indicator of RSPO P&C 2018.
1712399-201611-M4	Major	5.6.1	29/11/2018	Closed out on 10/02/2019
1712399-201611-M5	Major	5.11.1	29/11/2018	Closed out on 10/02/2019

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1712399-201611-N1	Minor	4.7.5	29/11/2018	The previous minor NC is not effectively closed and raise under the new indicator of RSPO P&C 2018
1712399-201611-N2	Minor	5.3.3	29/11/2018	The previous minor NC is not effectively closed and raise under the new indicator of RSPO P&C 2018
1849207-201909-M1	Major	3.6.1	25/11/2019	Closed out on 5/2/20
1849207-201909-M2	Major	3.6.2	25/11/2019	Closed out on 5/2/20
1849207-201909-M3	Major	1.1.4	25/11/2019	Closed out on 5/2/20
1849207-201909-M4	Major	5.3.2 (SCCS)	25/11/2019	Closed out on 5/2/20
1849207-201909-M5	Major	4.1.1	25/11/2019	Closed out on 5/2/20
1849207-201909-M6	Major	6.2.2	25/11/2019	Closed out on 11/2/20
1849207-201909-M7	Major	6.5.1	25/11/2019	Closed out on 5/2/20
1849207-201909-M8	Major	3.4.3	25/11/2019	The NC is dropped based on BSI's appeal panel decision on 17/1/20.
1849207-201909-M9	Major	7.12.4	25/11/2019	Closed out on 5/2/20
1849207-201909-N1	Minor	7.8.3	25/11/2019	"Open"
1849207-201909-N2	Minor	6.7.2	25/11/2019	"Open"
1849207-201909-N3	Minor	6.7.4	25/11/2019	"Open"
1849207-201909-N4	Minor	2.2.2	25/11/2019	"Open"
1849207-201909-N5	Minor	2.2.3	25/11/2019	"Open"
1849207-201909-N6	Minor	4.2.2	25/11/2019	"Open"
1849207-201909-N7	Minor	4.2.3	25/11/2019	"Open"
1849207-201909-N8	Minor	4.2.4	25/11/2019	"Open"
1849207-201909-N9	Minor	6.2.7	25/11/2019	"Open"
1849207-201909-N10	Minor	6.3.2	25/11/2019	"Open"
1849207-201909-N11	Minor	2.1.2	25/11/2019	"Open"
1849207-201909-N12	Minor	4.4.6	25/11/2019	"Open"
1849207-201909-N13	Minor	4.8.4	25/11/2019	"Open"
1849207-201909-N14	Minor	7.3.1	25/11/2019	"Open"
1849207-201909-N15	Minor	7.3.2	25/11/2019	"Open"

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

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

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

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

List of Stakeholders contacted	
<b>Internal Stakeholders</b> Delegates’ Representatives (Workers and Staffs) CDQ and CDD workers Female representative Field workers Mill workers	<b>Union/Contractors/external stakeholders</b> Communities from Douya village, Mbadi village, Mouladou fouala village and Koumbanou/Maramba village. Communities from Migabe Contractor
<b>Government Departments</b>	<b>NGO</b>

Stakeholders comment	
<b>1</b>	<p><b>Feedbacks:</b>                      Delegates’ Representatives (Workers and Staffs) – The staff delegate has requested to have frequent meeting with the management to discuss on the staff’s collective agreement as the agreement is still pending in progress. The workers’ delegate has informed that the management has taken effort to resolve the matters raised during strike happened on September 2018. There was improvement sighted since last year. She also informed that all the male and female employees are treated equally. Promotion of job will be based on the capability of the employees does not matter gender, sexuality and nationality. There was female workers who are pregnant been promoted to be CDQ as well.</p> <p><b>Management Responses:</b>                      The management noted with the positive feedbacks and will try to organize meeting more frequently with the staff delegates to establish the collective agreement.</p> <p><b>Audit Team Findings:</b>                      No other issue.</p>
<b>2</b>	<p><b>Feedbacks:</b>                      Communities from Douya village, Mbadi village, Mouladou fouala village and Koumbanou/Maramba village – They informed that they did not know the process of the request of documentation and information from Olam. Their common issue is regarding to the maintenance of solar light in the village, as some of them</p>

	<p>are not functioning. They have given the permission to Olam for the cultivation of oil palm. No communication of the Human rights policy to them.</p> <p><b>Management Responses:</b>  The maintenance project is in progress based on the priority of the issue. Communication of the procedures and policies will be carry out in stages.</p> <p><b>Audit Team Findings:</b>  Refer to Indicator 1.1.4 and 4.1.1.</p>
3	<p><b>Feedbacks:</b>  Communities from Mboukou – The complaint that they raised during 26/8/2019 has yet to be resolved. No follow up from Olam. Water analysis result has yet to receive from the NGOs. They informed that the river was polluted with trashes and caused the fish dead during dry season.</p> <p><b>Management Responses:</b>  The dead fish incident was happened on the trenches, not river. The management has follow-up with the NGOs on the water analysis result. However, the NGOs informed that there was no water sample been taken by them. The management has visited the incident area with the villagers on early of November 2019 with no sign of dead fish.</p> <p><b>Audit Team Findings:</b>  Refer to Indicator 4.2.3 for the objective evidence.</p>
4	<p><b>Feedbacks:</b></p> <ul style="list-style-type: none"> <li>i) Female workers – Interviewed with two female workers’ who are complainants of sexual harassment cases in Lot 1 and Lot 3. One of the complainant informed that she did not aware of the investigation results and was not satisfied with the action taken by the company. Currently, she still working in the same estate with the respondent.</li> <li>ii) On the other hand, the complainant from Lot 1 has informed that the management has taken action to resolve the case and she has been informed by the management on the investigation result. She informed her superior on that safety issue for a female nurse to standby at the clinic during night shift. However, no action taken by the management.</li> </ul> <p><b>Management Responses:</b></p> <ul style="list-style-type: none"> <li>i) The management did not categorized the case as sexual harassment. Therefore, only a warning letter issued to the respondent.</li> <li>ii) HR Manager informed that he has received the complaint from the Doctor verbally. The management has discussed on this issue to assign security guard to standby at the clinic.</li> </ul> <p><b>Audit Team Findings:</b></p> <ul style="list-style-type: none"> <li>i) Refer to Indicator 6.5.1 for the objective evidence.</li> <li>ii) Refer to Indicator 4.2.3 for the objective evidence.</li> </ul>
5	<p><b>Feedbacks:</b>  Contractor – He informed that he has signed on the contract agreement prior to provide service to OPG. He has been briefed on the terms &amp; conditions and regulations in the company. No issue on the payment term.</p> <p><b>Management Responses:</b>  Noted and will continue to update the contractors if there is any new regulations.</p> <p><b>Audit Team Findings:</b>  No further issue.</p>
6	<p><b>Feedbacks:</b>  Communities from Migabe – The Chief of Village and Representatives informed they are aware of the FPIC process whereby they have the rights to their land. OPG did not destroy their cultural living during the cultivation of oil palm. They have attended the Steering Committee meeting that held between OPG, local communities and local authorities by updating on the progress of social contract. There was improvement to their village but was in slow progress.</p> <p><b>Management Responses:</b>  Noted and will try to execute the Social Contract. Any updated will be done during Steering Committee meeting.</p>

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

Villager consulted were the previous land users within the concession area of Mouila lot 1 and lot 3. Ownership is still belong to government of Gabon and leased to Olam Palm Gabon (OPG) for 50 years until 2066.  
*Reference is made to; RSPO GHG Assessment for New Plantings, Lot 3 Extension, Olam Palm Gabon dated 15/2/17, Summary Report of ESIA and HCV Assessments Olam Palm Gabon, Mouila Lot 3 May 2015.*

Previous land owner / user comment	
<b>1</b>	<p><b>Feedbacks:</b>            Communities from Douya village, Mbadi village, Mouladou fouala village and Koumbanou/Maramba village – They informed that they did not know the process of the request of documentation and information from Olam. Their common issue is regarding to the maintenance of solar light in the village, as some of them are not functioning. They have given the permission to Olam for the cultivation of oil palm. No communication of the Human rights policy to them.</p> <p><b>Management Responses:</b>            The maintenance project is in progress based on the priority of the issue. Communication of the procedures and policies will be carry out in stages.</p> <p><b>Audit Team Findings:</b>            Refer to Indicator 1.1.4 and 4.1.1.</p>

### 3.6 Impartiality and conflict of interest

During this assessment there *was no / was* circumstances or pressure that had influenced the independence or confidentiality of the assessment team (*Lead auditor is required to provide details if there was such circumstances or pressure and provide details of the reporting to the local C&R and BSI Services Malaysia Sdn Bhd*).

<b>Formal Signing-off of Assessment Conclusion and Recommendation</b>	
<p>The audit objectives have been achieved and the certificate scope remains appropriate. Based on the results of this audit, it is concluded that Olam Bilala Palm Oil Mill Certification Unit has complied with the RSPO P&amp;C 2018 and Supply Chain Certification Standard (June 2017) and audit criteria identified within the audit report. It is deemed that the management system continues to achieve its intended outcomes. Therefore, it is recommended that the certification of Olam Bilala Palm Oil Mill is continued.</p>	
<b>Report prepared by</b>	<b>Acceptance of Assessment Conclusion</b>
<p><b>Name:</b>  <b>Mohamed Hidhir Zainal Abidin</b></p>	<p><b>Name: Audrey Lee Mei Fong</b></p>
<p><b>Company Name:</b>  <b>BSI Services Malaysia Sdn Bhd</b></p>	<p><b>Company Name: Olam International Limited</b></p>
<p><b>Title:</b>  <b>Lead Auditor</b></p>	<p><b>Title: Sustainability General Manager</b></p>
<p><b>Signature:</b></p> 	<p><b>Signature:</b></p> <p><i>(I the undersigned, being the most senior relevant management representative of the operation seeking or holding certification, agree with the contents of this report and accept the liability in execution of the procedure in the report.)</i></p> 
<p><b>Date: 22<sup>nd</sup> March 2020</b></p>	<p><b>Date: 26<sup>th</sup> Mar 2020</b></p>

**Appendix A: Summary of Findings**

Criterion / Indicator	Assessment Findings	Compliance	
<p><b>Principle 1: Behave ethically and transparently</b> Drive ethical business behaviour, build trust and transparency with stakeholders to ensure strong and healthy relationships.</p>			
<p><b>Criteria 1.1</b> The unit of certification provides adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.</p>			
<p>1.1.1</p>	<p><b>(C)</b> Management documents that are specified in the RSPO P&amp;C are made publicly available.</p>	<p>As per the Stakeholders Communication Guideline with Doc. No.: GUI NO 01/CRS/MOUILA/0919, Rev. 0 dated 1 September 2019, the information should be available at the unit of certification upon request such as:</p> <ul style="list-style-type: none"> <li>i. Land use right</li> <li>ii. Health &amp; Safety Plan</li> <li>iii. ESIA</li> <li>iv. ESMP</li> <li>v. HCV and HCS if relevant</li> <li>vi. Pollution prevention and reduction plan</li> <li>vii. Grievances policy and record</li> <li>viii. Negotiation document</li> <li>ix. Human rights policy</li> <li>x. CIP</li> <li>xi. Reports</li> </ul> <p>This information is made available to stakeholders through various channels such as Olam website, RSPO website, notice board, various committees and Foreign Workers Representative/ Contractor Workers Representative.</p>	<p>Complied</p>

1.1.2	Information is provided in appropriate languages and accessible to relevant stakeholders.	All the related information were in the national language of Gabon, French such as complaint procedure, policies and the meeting minutes of Steering Committee Meeting.	Complied
1.1.3	<b>(C)</b> Records of requests for information and responses are maintained.	Seen the email communication related to the request for information from stakeholders which handled by Head of CRS, Olam International for case study by The Rainforest Foundation UK. Besides, the company has provided a set of procedures, meeting minutes and complaint forms to all the villages for their record.	Complied
1.1.4	<b>(C)</b> Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by a nominated management official.	<p>Olam Palm Gabon has developed a procedure on Consultation and Communication with the Local Communities with Ref. No. 01, Version 01 dated 2/7/2012. The purpose of the procedure is to describe the methods to consult and communicate with the riparian communities. The procedure is developed as part of the implementation of FPIC process. Olam has distributed the procedure to each of the Chief of Local Communities by verified during visit to the villages.</p> <p>Besides, OPG has developed Stakeholders Communication Guideline with Doc. No.: GUI NO 01/CRS/MOUILA/0919, Rev. 0 dated 1 September 2019. The objective of the procedure is to facilitate effective communication, ensure info distribution in appropriate languages and forms to allow for effective participation in decision making with relevant stakeholders as required by RSPO P&amp;C. Human Resource and Mill Manager will be the responsible person to handle internal communication and administrating communication with business related stakeholders.</p> <p>Stakeholders Communication Guideline with Doc. No.: GUI NO 01/CRS/MOUILA/0919, Rev. 0 dated 1 September 2019 was developed. However, interviewed with the Social Responsible found that they are not aware of the guidelines and have yet to implement the guideline since 1 September 2019.</p>	Major non-compliance



		Interview with Forestry Department and local communities further confirm that they are not aware on the procedure to request for documentation and information. Thus a major NC was raised.	
1.1.5	There is a current list of contact and details of stakeholders and their nominated representatives.	There was an updated stakeholder list for Lot 1 and Lot 3 in Mouila on 17/11/2019 which consisted of local NGO, local communities representatives, government authorities and contractors. Person to be contacted with the contact information was clearly stated in the stakeholder list.	Complied
<b>Criteria 1.2</b>			
The unit of certification commits to ethical conduct in all business operations and transactions.			
1.2.1	A policy for ethical conduct is in place and implemented in all business operations and transactions, including recruitment and contracts.	Olam Palm Group has developed the "The Olam Code of Conduct" dated February 2016 where the company uphold the law and the Code to put integrity and fair play at the heart of all relationships with respect the rights of individuals, communities and the environment. Compliance with the Code of Conduct also applied to third parties engaged by the company. Besides, "Olam Supplier Code" dated April 2018 was established to ensure the suppliers are complying with all relevant applicable laws and regulations that govern their operations, business, industry trade and personnel, and respect contractual obligations. Any corrupt or unethical practices such as paying bribes a prohibition for any purpose. In additional, "Olam Anti-Bribery and Corruption Policy" established to uphold globally all applicable laws relevant to countering bribery and corruption. Olam takes zero-tolerance approach to bribery and corruption. The policy has covered the elements such as donations that are legal and ethical under local laws and practices, gifts and entertainment.	Complied
1.2.2	A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice.	The Legal Department in Libreville and Mouila will regularly monitor and review the effectiveness and implementation of the "Olam Anti-Bribery and Corruption Policy". Besides, the company will make sure their	Complied

		<p>suppliers and sub-contractors are fully aware of the "Olam Supplier Code" and its meaning by signing a contract agreement with all the contractors. Interviewed with the contractor confirmed that he is aware of the policy.</p> <p>An online web training for "Olam Anti-Bribery and Corruption Policy" was conducted to all the employees with company's email address. Seen the completed list for the employees that have participated in the online web training dated 8/10/2019. In addition, training conducted by the Legal Officer in Libreville to the management team in Mouila on 23/11/2018. Seen the attendance list of the training.</p> <p>Verified with the Legal Officer that there was an independent third party, AIC conducted legal audit on yearly basis to ensure the employees and contractors are complying with the regulations. The topics that will be audited are such as:</p> <ul style="list-style-type: none"> <li>i. Formalization and content of service providers contracts</li> <li>ii. Administrative control of employment, formalization and termination of employment contracts</li> <li>iii. Tax</li> <li>iv. Social Security</li> <li>v. Security relating to the transportation of personnel and goods</li> <li>vi. Environmental Impact Assessment</li> </ul> <p>The latest audit was carried out on 11/11/2019 and waiting for the checklist results from AIC. Seen the audit checklist for the audit conducted on Year 2018.</p> <p>A Whistleblowing Policy is in placed to encourage employees to raise concerns directly with their supervisor, local HR manager or via Olam whistleblowing channel if found any inappropriate conduct. The employee can reported directly to Internal Audit department if found any fraud, bribery or serious wrong doing.</p>	
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<p><b>Principle 2: Operate legally and respect rights</b>          Implement legal requirements as the basic principles of operation in any jurisdiction.</p>			
<p><b>Criteria 2.1</b>          There is compliance with all applicable local, national and ratified international laws and regulations.</p>			
2.1.1	<p><b>(C)</b> The unit of certification complies with applicable legal requirements.</p>	<p>Bilala Palm Oil Mill and supply base had continued to comply with legal requirements as per indicator. Compliance to each applicable law and regulation is monitored by the operating units and sustainability team.</p> <p>Two certificates of compliance and one Authorization of exploiting have been delivered by DGEPN (the main state environmental administration putting in place and assessing the national environmental politic) are enough to attest the respect of legal requirements. Related social and environmental permit are still valid at the point of assessment.</p>	Complied
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>Legal register, list of laws and conventions for OPG project – June 2019. Changes incorporated in the list dated June 2019, ref N° 01/LEG LIST/0619. Latest update on the legal related to PPF @ Fauna Protection Plan. Refer to Arrête n° 937/MEFEDD/SG/DGFAP dated 11/6/18. Ministry of Forest, Environment and Climate Plan has announce on the direction for fauna protection plan establishment by independent party on 25/1/19.</p> <p>During the daily opening meeting on 23/11/2019 for assessment at Lot 1, it was informed that there are trucks transferring workers could not make it to the estate and have to return due to potentially the contractors managing the transfer have not paid Patent Tax. Interview with Olam personnel shows that there is no monitoring if the contractor are meeting the legal requirements of paying the required taxes whereas this particular clause is within the contract. As a consequent of not able to monitor this requirement, workers have missed their work opportunity for the day. Thus, a minor NC was issued.</p>	Minor non-conformance

2.1.3	Legal or authorised boundaries are clearly demarcated and visibly maintained, and there is no planting beyond these legal or authorised boundaries.	Legal boundaries were clearly demarcated by putting concrete pegs painted with red and white colour at the critical points of the land concession. Physical boundary as such trenches was also constructed to clearly demarcate the area. The trenches also are part of mitigation to prevent elephant intrusion at newly planted area. Verification through site visit) showed that the GPS coordinates of the pegs were consistent with those stated on the land title map.	Complied
<b>Criteria 2.2</b> All contractors providing operational services and supplying labour, and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements.			
2.2.1	A list of contracted parties is maintained.	Olam Palm Gabon – Lot 1 and Lot 3 has maintained a List of Contractors for activities such as agricultural services, transporter of workers and FFB transporters by Admin Department. There are total 16 contractors providing agricultural services, 22 contractors providing transporting of workers services and 14 contractors are FFB transporters.	Complied
2.2.2	All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal requirements, and this can be demonstrated by the third party.	There was no specific clauses on meeting applicable legal requirements in the contractor's agreements as below: <ul style="list-style-type: none"> <li>i. Contract No.: OPGM/MIR/07/19/R002 Lot 1 for truck rental with driver which valid from 1/7/2019 to 31/12/2019.</li> <li>Contract No.: OPGM/MIR/07/19/013 Lot 1 for truck rental with driver which valid from 2/9/2019 to 31/12/2019.</li> </ul> Thus, a minor NC was issued.	Minor non-conformance
2.2.3	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.	The sampled contract agreements found that there was no special clauses disallowing child, forced and trafficked labour and where young workers are employed, the contracts include a clause for their protection. <ul style="list-style-type: none"> <li>i. Contract No.: OPGM/MIR/07/19/R002 Lot 1 for truck rental with driver which valid from 1/7/2019 to 31/12/2019.</li> </ul>	Minor non-conformance

		<p>ii. Contract No.: OPGM/MIR/07/19/L007 Lot 1 for agricultural services which valid from 1/7/2019 to 31/12/2019.</p> <p>iii. Contract No.: OPGM/MIR/07/19/013 Lot 1 for truck rental with driver which valid from 2/9/2019 to 31/12/2019.</p> <p>Thus, a minor NC was raised.</p>	
<p><b>Criteria 2.3</b> All FFB supplies from outside the unit of certification are from legal sources.</p>			
2.3.1	<p><b>(C)</b> For all directly sourced FFB, the mill requires:</p> <ul style="list-style-type: none"> <li>• Information on geo-location of FFB origins</li> <li>• Proof of the ownership status or the right/claim to the land by the grower/smallholder</li> <li>• Where applicable, valid planting/operating/trading license, or is part of a cooperative which allows the buying and selling of FFB</li> </ul>	<p>All FFB that is processed by the mill are from Mouila supply base including Lot 1, Lot 2, Lot 3 and Ndende. All 4 lots are under the management of OPG.</p> <p>The SAP system was verified. The inputs to the system only permits from including Lot 1, Lot 2, Lot 3 and Ndende.</p> <p>Since there is no sourced FFB, this indicator is not applicable.</p>	Not applicable
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>All FFB that is processed by the mill are from Mouila supply base including Lot 1, Lot 2, Lot 3 and Ndende. All 4 lots are under the management of OPG.</p> <p>The SAP system was verified. The inputs to the system only permits from including Lot 1, Lot 2, Lot 3 and Ndende.</p> <p>Since there is no sourced FFB, this indicator is not applicable.</p>	Not applicable
<p><b>PROCEDURAL NOTE:</b> For Implementation Procedure for 2.3.2 refer to Annex 4.</p>			
<p><b>Principle 3: Optimise productivity, efficiency, positive impact and resilience</b> Implement plans, procedures and systems for continuous improvement.</p>			
<p><b>Criteria 3.1</b> There is an implemented management plan for the unit of certification that aims to achieve long-term economic and financial viability.</p>			

3.1.1	<b>(C)</b> A business or management plan (minimum three years) is documented that includes, where applicable, a jointly developed business case for Scheme Smallholders.	<p>OPG has gazetted long range business plan (OPEX and CAPEX: FY2018 - FY2041, reviewed in 2018) for Mouila Lot 1 and 3. The projection covers FFB forecast, extraction rate (OER &amp; KER), direct cost (upkeep, fertilizer, R&amp;D, mechanization, upkeep tools, harvesting, mill processing and overhead – manager &amp; staff emolument) and in-direct cost (corporate allocation). CAPEX allocation for 2019 has included budget on safety and health, social and welfare as well as for operation. Example of CAPEX for 2020:</p> <table border="1" data-bbox="1093 619 1926 917"> <thead> <tr> <th>Allocations</th> <th>CAPEX approved</th> <th>Remarks</th> </tr> </thead> <tbody> <tr> <td>Kernel crushing plant</td> <td>May 2020</td> <td>To cope out demand for PKO and load of Awala KCP</td> </tr> <tr> <td>Bulk Storage Tank</td> <td>2020</td> <td>BST x 2 units (2000 mt) PKO X3 units (500 mt)</td> </tr> <tr> <td>G10 house</td> <td>2020</td> <td>200 units</td> </tr> </tbody> </table>	Allocations	CAPEX approved	Remarks	Kernel crushing plant	May 2020	To cope out demand for PKO and load of Awala KCP	Bulk Storage Tank	2020	BST x 2 units (2000 mt) PKO X3 units (500 mt)	G10 house	2020	200 units	Complied
Allocations	CAPEX approved	Remarks													
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G10 house	2020	200 units													
3.1.2	An annual replanting programme projected for a minimum of five years with yearly review, is available.	There will be no replanting at least for the next 20-25 years for Mouila lot 1 and 3 estates as the first planting was done in 2012.	Complied												
3.1.3	The unit of certification holds management reviews at planned intervals appropriate to the scale and nature of the activities undertaken.	The latest management review was carried out 4/9/19. This meeting is planned on annual basis.	Complied												
<p><b>Criteria 3.2</b> The unit of certification regularly monitors and reviews their economic, social and environmental performance and develops and implements action plans that allow demonstrable continuous improvement in key operations.</p>															
3.2.1	<b>(C)</b> The action plan for continuous improvement is implemented, based on consideration of the main social and environmental impacts and opportunities of the unit of certification.	The continuous improvement plan was developed on 01/01/2016 and reviewed on 08/04/2019. As per the review procedures, the plan will be reviewed once every 5 years. The 08/04/2019 improvement plan included the element on – 1) Reduction in use of pesticide 2)	Complied												

		<p>Minimization of Environmental Impacts 3) Yield Optimization for supply base 4) Training 5) Plan to reduce pollution and emissions, including GHG are developed, implemented and monitored 6) Minimization of Environmental Impacts (Social) 7)</p> <p>Sample of improvement plan implementation verified:</p> <ol style="list-style-type: none"> <li>1. Practice minimized and control erosion and degradation of soils.             <ol style="list-style-type: none"> <li>a. The annual agronomy report provided the recommendation for improvement. The last report was dated November 2018 while recommendation for 2020 is still in draft.</li> <li>b. Soil survey was conducted by Param Agriculture and reported in September 2014. As per the plan, the survey will be conducted once every 5 years. The monthly work report for November 2019 has demonstrated the survey will start by November 2019.</li> <li>c. EFB application records for Lot 1 was verified.</li> <li>d. The land cover crop is incorporated as part of the OPG Agriculture Policy Manual Volume 1 – Chapter 9 – Weed Management.</li> </ol> </li> <li>2. Pesticides are used in ways that do not endanger health or the environment             <ol style="list-style-type: none"> <li>a. The chemical used is documented in "Pesticide Active Ingredients Analysis per Ha" on monthly basis. Year to year comparison for Glyphosate Isopropylamine usage for 2018 and 2019 shows reduction of usage.</li> <li>b. The owl breeding program has not been successful due to nearby HCV area. However the records shows that there is no rat bait applied in Lot 1. Rat bait was used in Estate 14 and 15 (Lot 3) at immature area.</li> </ol> </li> </ol>	
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>It is noted that RSPO has not finalized the RSPO metric template. Communication with RSPO Secretariat was made and noted that the indicator is not applicable until the template is finalized.</p> <p>However, OPG has internal metrics in place that is similar to RSPO requirements. The internal metrics documented in the OPG AtSource.</p>	Not applicable

<b>Criteria 3.3</b>			
Operating procedures are appropriately documented, consistently implemented and monitored.			
3.3.1	<b>(C)</b> Standard Operating Procedures (SOPs) for the unit of certification are in place.	<p>The palm oil mill operation are operated following the documented "Olam Palm Gabon-Standard Operating Procedure for Palm Oil Mill, dated 24/04/2015", which consist of 14 SOPs covering all operations including starting from reception station and fruit handling, sterilization and pressing, pressing and clarification station, kernel recovery station, boiler station, power generation station, laboratory, water treatment plant, ETP operation, workshop and maintenance. As for RSPO SCC implementation, RSPO Supply Chain &amp; Traceability (Mass Balance Model), ref: POM-SC/MB001, rev:4 dated 1/11/19 is referred to. This procedure has explained on the handling of incoming FFB, processing and outgoing Crude Palm Oil (CPO) and Palm Kernel (PK) for the traceability with Mass Balance model covering certified and non-certified FFB received.</p> <p>OPG estates continue to implement the SOPs for the estate are documented in "Olam Palm Gabon-Agriculture Policy Manual Volume 1 and Volume 2 dated April 2013 endorsed by Olam Global Head of Plantation. Volume 1 and 2 of the Agriculture Policy Manual consist of 20 SOPs covering all operations (immature and mature planting) from land preparation and clearing, nursery establishment, planting technique, harvesting, FFB evacuation, field upkeep, IPM practices, water management and drainage system, innovative mechanization practices and etc.</p>	Complied
3.3.2	A mechanism to check consistent implementation of procedures is in place.	<p>Mechanism to check consistent implementation is in place by internal and external party</p> <ul style="list-style-type: none"> <li>i) Field inspection (weekly) – vehicle, alcohol test, speed limit, work unit (interceptors), PPE compliance report.</li> <li>ii) Agronomy visit (harvesting, manuring, immature upkeep, FFB grading and nursery) – monthly and yearly basis.</li> </ul>	Complied



		<ul style="list-style-type: none"> <li>iii) Sustainability audit (yearly basis) - lot 1 and Bilala POM (</li> <li>iv) Soil study/sampling reporting – initial stage and repeated every 5 years by Param Agricultural Soil Surveys (M) Sdn Bhd.</li> <li>v) CABI (Centre of Agriculture and Bioscience International) – scouting visit</li> <li>vi) APNI (African Plant Nutrition Institute) – BMP (quarterly programme)</li> <li>vii) 3<sup>rd</sup> party steam boiler and unfired pressure vessel inspection (mill operation)</li> <li>viii) Mill visiting engineer visit/inspection (annual visit)</li> </ul>										
3.3.3	Records of monitoring and any actions taken are maintained and available.	<p>Records of monitoring checked;</p> <ul style="list-style-type: none"> <li>i) APNI - date of visit (19-26/10/19), recommendation of yield intensification programme (manuring, harvesting rounds improvement etc) on the BMP blocks.</li> <li>ii) Agronomist report (annual &amp; monthly report)</li> </ul> <table border="1" data-bbox="1093 914 1930 1401"> <thead> <tr> <th data-bbox="1093 914 1267 951">Plantation</th> <th data-bbox="1267 914 1653 951">Agronomist report</th> <th data-bbox="1653 914 1930 951">Visit date</th> </tr> </thead> <tbody> <tr> <td data-bbox="1093 951 1267 1110">Lot 1</td> <td data-bbox="1267 951 1653 1110">3rd annual agronomy report (palm status, leaf nutrient survey, crop productivity, OER/KER and fertilizer recommendation for 2019)</td> <td data-bbox="1653 951 1930 1110">November 2018</td> </tr> <tr> <td data-bbox="1093 1110 1267 1401">Lot 1</td> <td data-bbox="1267 1110 1653 1401">Monthly agronomy report, lot 1 Losses: average reduce to 6.6 kg/ha Ripeness standard: sick bunches reported, 78.2% &lt; 87% (std) Manuring: unmanured palm reported.</td> <td data-bbox="1653 1110 1930 1401">October 2019</td> </tr> </tbody> </table>	Plantation	Agronomist report	Visit date	Lot 1	3rd annual agronomy report (palm status, leaf nutrient survey, crop productivity, OER/KER and fertilizer recommendation for 2019)	November 2018	Lot 1	Monthly agronomy report, lot 1 Losses: average reduce to 6.6 kg/ha Ripeness standard: sick bunches reported, 78.2% < 87% (std) Manuring: unmanured palm reported.	October 2019	Complied
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		<p>Lot 1</p>	<p><u>Plantation weekly speeding monitoring</u> Report ref: week 46, result 4 (1: OLAM contractor:3, over speed, 136 normal speed) <u>Plantation Alcohol Control</u> Random test on weekly basis by safety team ( test: 166, positive: 6 workers) <u>Vehicle Check</u> Weekly basis for Olam’s registered vehicle and contractors PPE Monitoring and Compliance</p>	<p>November 2019</p>	
		<p>Bilala POM</p>	<p>External mill visiting engineer Date of visit: 16<sup>th</sup> January 2019 KCP construction project review – to ascertain the requirement for the proposed KCP construction</p>	<p>January 2019</p>	
		<p>Lot 3</p>	<p>1<sup>st</sup> annual agronomy report (palm status, leaf nutrient survey, crop productivity, OER/KER and fertilizer recommendation for 2019</p>	<p>November 2018</p>	
		<p>Lot 3</p>	<p>Monthly agronomy report, lot 3 Losses: 3 kg/ha/rd</p>	<p>October 2018</p>	

			Ripeness standard: sick bunches reported, 69.88% < 87% (std) Manuring: unmanured palm reported.	
<b>Criteria 3.4</b>				
A comprehensive Social and Environmental Impact Assessment (SEIA) is undertaken prior to new plantings or operations, and a social and environmental management and monitoring plan is implemented and regularly updated in ongoing operations.				
3.4.1	<b>(C)</b> In new plantings or operations including mills, an independent SEIA, undertaken through a participatory methodology involving the affected stakeholders and including the impacts of any smallholder/outgrower scheme, is documented.	The SEIA was conducted by Ecosphere while the report was finalized in May 2012 for Lot 1 while for Lot 3 it was conducted by TERE/Proforest and the report was finalized in Feb 2015 and Feb 2017 respective for Lot 3 and Lot 3 Extension. OPG Mouila Lot 1 and Lot 3 are started from New Planting Procedures. The SEIA report has reported that the identification of the impacts are through participatory. This was confirmed during stakeholders meeting with villagers.  There is no smallholder scheme attached to this certification.  The SEIA for the irrigation was conducted by BRL Ingenierie partnering with TERE and report was finalized in March 2019. The SEIA was conducted with participation of local community with a comprehensive feasibility study by Witteveen + Bos in March 2018. Sample of the consultation for Mbadi village was conducted on 16/03/2019. The attendance list of the consultation is attached in the SEIA report. The approval for the irrigation project was obtained on 25/10/2019. The license 001568/MEFMEPCPAT/SG/DGEPN was issued by Environment General Directorate of Ministry of Water and Forest.		Complied
3.4.2	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.	The management plan for Lot 1 was developed during the SEIA in 2012. The management plan was recommended by Ecosphere. The implementation of the recommendation has been carried out and the progress of the implementation is updated annually and submitted to the Department of Environmental following the Gabon Code of		Complied

		<p>Environmental No16/93 dated 26/08/1993. The last submission was in December 2018.</p> <p>The recommended management plan for the water irrigation project was developed in the SEIA. The minutes of the consultation with the local communities was reviewed and taken into consideration for the recommendation for the management plan.</p>	
3.4.3	<p><b>(C)</b> The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way.</p>	<p>There was no change required for the original management plan. This was supported by the recommendation from the Directorate General of Environmental and Natural Protection on 06/11/2018 and 21/10/2019.</p> <p>The management review of the non-changes required are conducted on periodic basis. Email communication between Head of CRS of OPG and local CRS was observed regarding the "review".</p> <p>For 2019, the rainfall was highest since OPG started operations in Mouila. The extensive rainfall has caused water log within the plantations and wash down of fertilizer was observed. However, reviewing the management plan, this condition has not been reviewed and updated.</p> <p>Based on decision by BSI appeal panel dated 17/1/20, major NC was drop to OFI @ opportunity for improvement.</p>	Complied
<p><b>Criteria 3.5</b>  A system for managing human resources is in place.</p>			
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>Olam Palm Group has developed Foreign Workers' Recruitment Policy (Workers from Indonesia) with Doc. No.: DS-PRP.01, Issue 1 dated 18/5/2017. The company is committed to ensure that all workers identified and recruited from overseas are given facilities and benefits in accordance to internationally accepted standards. Besides, Procedure on Internal Recruitment for Foreign Workers with Ref. No.</p>	Complied

		<p>001/03/2016/RH/GT, version 1 dated March 2016. The procedure describe the main step on recruitment and regularization of foreign workers in accordance to Gabon’s regulations. The company is made reference to the regulations such as Decree n°00277/PR-MT dated 31/5/1968 Regulating the Employment of Foreign Workers in Gabon, Article 104 to 109 of the Labour Code in Gabonese Republic and etc. The procedure has detailed out in flowchart on the process of recruitment.</p> <p>Besides, Olam has established Procedure of Recruitment of National Employees with Ref. Doc.: 2708/2016RH/JB, Ver. 1 dated 27/8/2016 to explain the procedure of the recruitment process of the national employees. The following processes have been further elaborated:</p> <ul style="list-style-type: none"> <li>i. Employment Request</li> <li>ii. Employee Recruitment</li> <li>iii. Pre-selection</li> <li>iv. Interview and Engagement</li> <li>v. Employment Offer</li> <li>vi. Fitness of the employment</li> <li>vii. Integration Procedure</li> </ul>	
3.5.2	Employment procedures are implemented and records are maintained.	The HR Manager informed that they would broadcast the job opportunities in televisions, radio channel and newspapers. Seen the Job Vacancies that published in newspapers. Through submission of resume from the candidates, they will arranged for interview and evaluate the candidates based on the Assessment Checklist for Candidate. Based on the checklist, the interviewer would need to fill in based on competency, technical knowledge, leadership, ability of teamwork and resolve problem of the candidates. A New Employee Evaluation of technical questions need to answer by the candidates. Seen the Assessment Checklist and New Employee Evaluation dated 5/5/2018 for the position of Civil Engineering Assistant Manager.	Complied

Criteria 3.6						
An Occupational health and safety (H&S) plan is documented, effectively communicated and implemented.						
3.6.1	<p><b>(C)</b> All operations are risk assessed to identify H&amp;S issues. Mitigation plans and procedures are documented and implemented.</p>	<p>The risk assessment was established as per Safety Risk Management (S101.1, Issue 4, Date: 01/04/2016). The management was identified and registered the risk and summarized it in the Mouila Palm Oil Mill Risk Assessment and Mouila Plantation Risk Assessment. The risk assessment was last reviewed on 29/06/19 by SHO (for Bilala POM), effective date 7/7/19. For 3 accident cases report at Bilala POM – No review of HIRARC carried out after accident occurrence.</p> <p>Mill operation (risk assessment register dated 7/7/19)            - Review of risk assessment after accident occurrence. Accident dated 2/8/19 (maintenance) and 20/10/19 (cleaning activity).</p> <p>Plantation (risk assessment register dated 10/10/19)            - Spraying at immature area (heat stress, ergonomic hazard)            - Harvesting (ergonomic hazard)            - Landfill operation</p> <p>Thus, a major NC was issued</p>	Major non-conformance			
3.6.2	<p><b>(C)</b> The effectiveness of the H&amp;S plan to address health and safety risks to people is monitored.</p>	<p>Health and Safety Plan implementation for 2019 was sighted. Among implemented plan as per the following:            i)Daily safety inspection – PPE, SOP implementation            ii)Awareness campaign, induction, training for H&amp;S            iii)Speed check (daily)            iv)Alcohol control (daily)</p> <p>H&amp;S weekly report (week 46 @ S46)</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 33%;">Key indicators</td> <td style="width: 33%;">Lot 3</td> <td style="width: 33%;">Lot 1</td> </tr> </table>	Key indicators	Lot 3	Lot 1	Major non-conformance
Key indicators	Lot 3	Lot 1				

**RSPO Public Summary Report  
Revision 9 (Nov 2019)**

Number of speed controls	4740	4367
Number of speeding	205	514
Sanction given	178	514
Number of alcohol control	922	269
Number of positive alcohol control	2	1
Sanction given	2	1
Number of trucks controlled	108	223
Number of trucks refused	33	34

Checklist for agrochemical spraying dated 13/11/19 (estate 14, div:4, team no. 38)

PPE random inspection form, JC service (estate:14, div 3 block W95) date of inspection 12/11/19.

Training and awareness programme

Title of Training	Date of training	Location of training
PPE and spraying	13/11/19	Estate 14, div:4 Gang# 38
Spraying training	15/10/19 and 14/10/19	Estate 15, div:1 Gang# SAPGA (contractor)  Estate 15, div:4 Gang# GISE (contractor)

		<table border="1"> <tr> <td>Tractor driver training</td> <td>8/11/19</td> <td>Lot 3</td> </tr> <tr> <td>Social induction, QSHE</td> <td>5/11/19</td> <td>Lot 3, contractor: SAPGA</td> </tr> <tr> <td>Social induction, QSHE, upkeep and harvesting training</td> <td>5/11/19</td> <td>Lot 3, estate 15 contractor: SAPGA</td> </tr> <tr> <td>Social induction, QSHE, importance of harvesting</td> <td>5/11/19</td> <td>Lot 3, estate 14 contractor: Ngounie Transport equipe "A"</td> </tr> <tr> <td>Social induction, QSHE, upkeep and harvesting training</td> <td>5/11/19</td> <td>Lot 3, estate 14, div:3, contractor: JC Services</td> </tr> </table>	Tractor driver training	8/11/19	Lot 3	Social induction, QSHE	5/11/19	Lot 3, contractor: SAPGA	Social induction, QSHE, upkeep and harvesting training	5/11/19	Lot 3, estate 15 contractor: SAPGA	Social induction, QSHE, importance of harvesting	5/11/19	Lot 3, estate 14 contractor: Ngounie Transport equipe "A"	Social induction, QSHE, upkeep and harvesting training	5/11/19	Lot 3, estate 14, div:3, contractor: JC Services		
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<p>Observed unsafe/condition;  i) Workers were standing in the truck without proper seat and protection. Location: PK19 entrance  ii) Improper use of safety boot while doing work. Location: estate 12 centralized workshop</p> <p>Thus, a major NC was issued.</p>																			
<p><b>Criteria 3.7</b>  All staff, workers, Scheme Smallholders, outgrowers, and contract workers are appropriately trained.</p>																			
<p>3.7.1</p>	<p><b>(C)</b> 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&amp;C, in a form they understand, and which includes assessments of training.</p>	<p>Formal training program for the year 2019 was published and made available at beginning of each Financial Year and implemented. Training identification and needs analysis were applied to recognize the staff, workers and contractor's deficient skills or knowledge gaps, particularly, in aspects of RSPO P&amp;C and the Supply Chain Certification System. There is no associated smallholders at this Certification Unit.</p>	<p>Complied</p>																



		Following the training given, regular assessment of training was conducted either by the Trainer or their immediate Supervisor to gauge trainees' understanding. Else, refresher course will be organized. For Pesticide Handlers the emphasis on training is on health and environmental risks of pesticide exposure as well as risk recognition of acute and long-term exposure symptom													
3.7.2	Records of training are maintained, where appropriate on an individual basis.	<p>Training records were observed updated and maintained. In general, the identified trainings covered the aspects of safety, environment, best practices and social. Sampled a few of the following training records at the respective assessed as per below:</p> <table border="1"> <thead> <tr> <th>Course title</th> <th>Date of training</th> </tr> </thead> <tbody> <tr> <td>First aid training</td> <td>31/10/19</td> </tr> <tr> <td>RSPO P&amp;C 2018 training</td> <td>26/10/19</td> </tr> <tr> <td>Waste Selection &amp; importance at site</td> <td>14/3/19</td> </tr> <tr> <td>Safety talk: PPE &amp; permit to work</td> <td>25/5/19</td> </tr> <tr> <td>LOTO, housekeeping and security inspection</td> <td>15/6/19</td> </tr> </tbody> </table> <p>Other related trainings carried out in 2019 can be referred to indicator 3.6.2.</p>	Course title	Date of training	First aid training	31/10/19	RSPO P&C 2018 training	26/10/19	Waste Selection & importance at site	14/3/19	Safety talk: PPE & permit to work	25/5/19	LOTO, housekeeping and security inspection	15/6/19	Complied
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LOTO, housekeeping and security inspection	15/6/19														
3.7.3	Appropriate training is provided for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS). Training is specific and relevant to the task(s) performed.	Appropriate training is provided for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS). Bilala POM RSPO SCC team which lead by mill manager were appropriately trained. Critical control point (CCP) personnel such as at security, weighbridge, laboratory and process were identified and trained. Latest training was carried out on 26/10/19 for P&C 2018 update.	Complied												

<p><b>Supply chain requirements for mills.</b></p> <p><b>Procedural note:</b></p> <p>The below numbering is as per the current RSPO SCCS standard and will be renumbered to become 3.8 and onwards following the revision of the RSPO SCCS in 2019. 'D' therefore refers to RSPO SCCS 'Module D – Crude Palm Oil (CPO) mills: Identity Preserved' and 'E' to RSPO SCCS 'Module E – CPO mills: Mass Balance'. Depending on the supply chain model chosen, the corresponding requirements apply as well as all general requirements (those with numbers only).</p> <p>The RSPO SCCS document uses the terms 'site' and 'organisation' to refer to the unit of certification.</p>			
<p><b>Definition</b></p>			
<p>Identity Preserved Mill D.1</p>	<p>A mill is deemed to be Identity Preserved (IP) if the FFB used by the mill are sourced from plantation/ estates that are certified against the RSPO Principles and Criteria (RSPO P&amp;C), or against the Group Certification scheme.</p> <p>Certification for CPO mills is necessary to verify the volumes and sources of certified FFB entering the mill, the implementation of any processing controls (for example, if physical separation is used), and volume sales of RSPO certified products. If a mill process certified and uncertified FFB without physically separating them, then only Module E is applicable.</p>	<p>Not applicable as Bilala Palm Oil Mill is certified as Module E: Mass Balance.</p>	<p>Not application</p>
<p>Mass Balance Mill E.1</p>	<p>Certification for CPO mills is necessary to verify the volumes of certified and uncertified FFB entering the mill and sales volume of RSPO certified products. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own and 3rd party certified supply base. In that scenario, the mill can claim only the volume of oil palm products produced from processing of the certified FFB as MB.</p>	<p>Bilala Palm Oil Mill receives and process both certified and non-certified FFB. Therefore, it uses the Module E: Mass Balance. During the P&amp;C assessment, the audit team verified the volumes and sources of certified and non-certified FFB entering the mill, the implementation of processing controls and volume sales of RSPO certified Products.</p>	<p>Complied</p>
<p><b>Explanation (Volume and product integrity)</b></p>			
<p>D.2 E.2</p>	<p>The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill shall be recorded by the certification body (CB) in the public summary of the P&amp;C</p>	<p>The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill is recorded in this public summary report.</p>	<p>Complied</p>

	<p>certification report. For an independent mill, the estimated tonnage of CPO and PK products shall be recorded in the RSPO IT platform, supply chain certificate and public summary audit report. This figure represents the total volume of certified oil palm product (CPO and PK) that the certified mill is allowed to deliver in a year. The actual tonnage produced shall then be recorded in each subsequent annual surveillance report.</p> <p>The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO supply chain managing organisation (RSPO IT platform).</p>	<p>The mill has met all registration and reporting requirements for the appropriate supply chain through the RSPO supply chain managing organization (RSPO IT platform or book and claim). Seen the Member ID: RSPO_PO1000006576 and license valid until 27/12/19. Total 3 sales of certified product (CSPK) were recorded on May 2019 and August 2019, refer to transaction ID as below:</p> <ul style="list-style-type: none"> <li>i. TR-e65214a6-6147 dated 28/8/2019; 2,050 MT</li> <li>ii. TR-6027e4a4-f212 dated 28/8/2019; 1,700 MT</li> </ul> <p>TR-404f70b2-72cb dated 23/5/2019; 775 MT</p>	
<p><b>5.3 Documented procedures</b></p>			
<p>5.3.1 D.3 E.3</p>	<p>The site shall have written procedures and/or work instructions to ensure the implementation of all elements of the applicable supply chain model specified. This shall include at minimum the following:</p> <ul style="list-style-type: none"> <li>• Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements.</li> <li>• Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records).</li> <li>• 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 organisation's procedures for the implementation of this standard.</li> </ul>	<p>A revised SOP on Supply Chain &amp; Traceability (Mass Balance Model), Doc. No.: POM-SC/MB/001, Rev. No. 4 dated 1/11/2019. The scope of the Mass Balance Model procedure in POM is to cover the entire supply chain activities and record data from the intake of certified and non-certified raw material till the delivery of certified and non-certified products.</p> <p>This procedure is developed and revised based on the RSPO P&amp;C 2018, Principle 3 – Supply Chain Requirements for Mills. The changes of the procedure on the element related to Outsourcing activities.</p> <p>The mill manager has the responsibility to implement, manage and verify all the overall Mass Balance Traceability activities and confirm traceability figures are accurate on monthly basis in accordance to the certification system requirements with the assistance from Mill Assistant or Management Representatives. The Mill Manager is able to demonstrate the implementation of the requirements.</p>	<p>Complied</p>

	<ul style="list-style-type: none"> <li>The site shall have documented procedures for receiving and processing certified and non-certified FFBS.</li> </ul>	<p>The receiving and processing certified and non-certified FFB procedure is addressed in the procedure mentioned above.</p>	
<b>5.3.2 Internal Audit</b>			
5.3.2	<p>The site shall have a written procedure to conduct annual internal audit to determine whether the organisation;</p> <ul style="list-style-type: none"> <li>Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.</li> <li>Effectively implements and maintains the standard requirements within its organisation.</li> </ul> <p>Any non-conformities found as part of the internal audit shall be issued corrective action. The outcomes of the internal audits and all actions taken to correct non-conformities shall be subject to management review at least annually. The organisation shall be able to maintain the internal audit records and reports.</p>	<p>Internal audit procedure is explained in the SOP on Supply Chain &amp; Traceability (Mass Balance Model), Doc. No.: POM-SC/MB/001, Rev. No. 4 dated 1/11/2019 under Section 1.6.9 Internal Audit and Management Review. The internal audit procedure specific the requirement on conforming the RSPO SCCS requirements and the RSPO Market Communications and Claims requirements. Any non-conformities found as part of the internal audit shall be issued corrective action as mentioned in the SOP.</p> <p>The last internal audit was conducted on 5/7/2019. The internal audit was conducted following the RSPO P&amp;C 2018, Principle 3 – Supply Chain Requirements for Mills. The audit checklist has been developed on January 2019 by Assurance Department and the internal audit reporting is based on the audit checklist. The internal auditor is Mr Denie Arifianto (RSPO Manager for Olam Gabon) who was trained in RSPO Supply Chain. Mr Denie is an independent party not involved in the mill operations.</p> <p>Total 3 non-conformities were raised. RSPO &amp; ISCC Action Plan was developed for the non-conformities raised during internal audit. The action plan has included details of follow-up action and details of progress. However, there was no root cause analysis and corrective action been identified. Thus, a major NC was issued.</p>	Major non-conformance

		<p>Management review to be conducted annual basis as per the SOP above. The last management review meeting was conducted on 4/9/2019. The inputs of the meeting are such as:</p> <ul style="list-style-type: none"> <li>i. Review on the results of internal audits covering RSPO &amp; ISCC compliance</li> <li>ii. Customer feedback</li> <li>iii. Status of preventive and corrective action</li> <li>iv. Follow-up actions from management reviews</li> <li>v. Changes that could affect the management system</li> </ul> <p>The outputs of the meeting are as such:</p> <ul style="list-style-type: none"> <li>i. Improvement of the effectiveness of the management system and its processes</li> <li>ii. Resources needs</li> </ul> <p>Action plan of the non-conformities were discussed during the meeting.</p>	
<b>5.4 Purchasing Goods In</b>			
<p>D.4.1/ D.4.2 E.4.1/E.4.2</p>	<p>The site shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBs received.</p> <p>The site shall inform the CB immediately if there is a projected overproduction of certified tonnage.</p> <p>The site shall have a mechanism in place for handling non-conforming oil palm products and/or documents.</p>	<p>The FFB Supply Base Information dated 01/01/2019 is available to show the certified FFBs and non-certified FFBs. The list has been approved by the Mill Manager as per the procedure POM-SC/MB/001 dated 01/11/2019. Interview with the weighbridge operator confirm that he understood the source of the material.</p> <p>Bilala Mill received FFBs from Lot 1; Lot 2; Lot 3 and Ndende. Only lot 1 and lot 3 is certified. Estate 1-6 and Estate 10-15 are RSPO certified while Estate 7-8 and Estate 16-18 are uncertified material.</p> <p>When there non-certified material identified, it will be quarantine until the source is being verified. As Bilala only received FFBs from its own estates, the risk of uncertified material contaminating the supply chain is minimal.</p> <p>The procedure POM-SC/MB/001 dated 01/11/2019 has identified when there is over-production, it shall inform the certification body.</p> <p>Sample of the FFB Dispatch chit verified:</p>	<p>Complied</p>

		<p><b>Date:</b> 28/01/2019  <b>Estate:</b> 13  <b>Truck number:</b> AL16111  <b>Unique number (SAP):</b> 2019002555  <b>Weight of the FFB:</b> 4,700mt  <b>Certification number:</b> as this is the same supply base on Bilala mill, it is not necessary to include the RSPO certificate number as the FFBs are not "purchased".</p> <p><b>Date:</b> 20/02/2019  <b>Estate:</b> 5  <b>Truck number:</b> FT 10/12  <b>Unique number (SAP):</b> 2019005071  <b>Weight of the FFB:</b> 9,980mt  <b>Certification number:</b> non-certified material</p> <p><b>Date:</b> 10/03/2019  <b>Estate:</b> 1  <b>Truck number:</b> EX502AA  <b>Unique number (SAP):</b> 2019007086  <b>Weight of the FFB:</b> 6,980mt  <b>Certification number:</b> as this is the same supply base on Bilala mill, it is not necessary to include the RSPO certificate number as the FFBs are not "purchased".</p>	
<b>5.5 Outsourcing Activities</b>			
5.5.1	<p>In cases where an operation seeking or holding certification outsources activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the operation seeking or holding certification shall ensure that the independent third party complies with the requirements of the RSPO Supply Chain Certification Standard. A</p>	<p>The CPO is transported by sister logistic company – Gabon Special Economic Zone Ports (GSEZ) which is under Olam Group where Olam has the management control. For PK, it is transported to Awala by own transport. Hence there is no outsource activity considered.</p>	Complied

	<p>CPO mill and independent mill cannot outsource processing activities like refining or crushing.</p> <p>This requirement is not applicable to outsourced storage facilities where the management of the oil palm product(s) and instructions for tank movements are controlled by the certified organisation (not the tank farm manager).</p>		
5.5.2	<p>Sites which include outsourcing within the scope of their RSPO Supply Chain certificate shall ensure the following:</p> <p>a) The site has legal ownership of all input material to be included in outsourced processes;</p> <p>b) The site has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The onus is on the site to ensure that certification bodies (CBs) have access to the outsourcing contractor or operation if an audit is deemed necessary.</p> <p>c) The site has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.</p>	<p>The CPO is transported by sister logistic company – Gabon Special Economic Zone Ports (GSEZ) which is under Olam Group where Olam has the management control. For PK, it is transported to Awala by own transport. Hence, there is no outsource activity considered.</p>	<p>Complied</p>
5.5.3	<p>The site shall record the names and contact details of all contractors used for the processing or physical handling of RSPO certified oil palm products. 5.5.4 The site shall at its next audit inform its CB of the names and contact details of any new contractor used for the processing or physical handling of RSPO certified oil palm products.</p>	<p>The CPO is transported by sister logistic company – Gabon Special Economic Zone Ports (GSEZ) which is under Olam Group where Olam has the management control. For PK, it is transported to Awala by own transport. Hence, there is no outsource activity considered.</p>	<p>Complied</p>
5.5.4	<p>The site shall at its next audit inform its CB of the names and contact details of any new contractor used for the processing or physical handling of RSPO certified oil palm products.</p>	<p>The CPO is transported by sister logistic company – Gabon Special Economic Zone Ports (GSEZ) which is under Olam Group where Olam has the management control. For PK, it is transported to Awala by own transport. Hence, there is no outsource activity considered.</p>	<p>Complied</p>

5.9 Record keeping			
5.9.1	The organisation shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of these RSPO Supply Chain Certification Standard requirements.	Bilala Palm Oil Mill has maintained the accurate, complete, up-to-date and accessible records and reports covering all aspects of these RSPO Supply Chain Certification requirements. All records also available in SAP system which is retrievable at any time.	Complied
5.9.2	Retention times for all records and reports shall be a minimum of two (2) years and shall comply with legal and regulatory requirements and be able to confirm the certified status of raw materials or products held in stock.	As per the SOP on Supply Chain & Traceability (Mass Balance Model), Doc. No.: POM-SC/MB/001, Rev. No. 4 dated 1/11/2019, the records related to supply chain and traceability certification will be retained for minimum 5 years. A table with List of Supply Chain Documents was established under Section 1.8.	Complied
5.9.3	The organisation shall be able to provide the estimate volume of palm oil / palm kernel oil content (separate categories) in the RSPO certified oil palm product and keep an up to date record of the volume purchased (input) and claimed (output) over a period of twelve (12) months.	The forecast volume for Bilala POM, Dec 2019 to Dec 2020: CSPO= 72,231.46 MT CSPK= 13,420.38 MT	Complied
D.5.1	The site shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis.	This is not applicable as the certification is mass balance.	N/A
E.5.1	<p>a) The site shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis and / or three-monthly basis.</p> <p>b) All volumes of palm oil and palm kernel oil that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO.</p> <p>c) The site can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery</p>	<p>Daily records are prepared at the entry point at the weighbridge. Daily summary and monthly summary documented for all the certified and noncertified FFB. Computerized system in place. Records verified by internal and external audit.</p> <p>Summary of FFB received, CPO and PK produced (certified and uncertified) verified via 2 reports;</p> <p>i) Daily FFB receipt report, SAP report reference no. <i>ozmagr020</i></p>	Complied



	within three (3) months. However, a site is allowed to sell short. (i.e. product can be sold before it is in stock.)	ii) Palm Product (CPO and PK) Mass Balance Calculation Record (ref 1.9)	
<b>5.10 Conversion Factors</b>			
5.10.1	Where applicable, a conversion rate shall be applied to provide a reliable estimate for the amount of certified output available from the associated inputs. Organisations may determine and set their own conversion rates which shall be based upon past experience, documented and applied consistently. Guidance on conversion rates is published on the RSPO website (www.rspo.org).	The YTD OER is 23.07 and KER is 4.08. The OER and KER is monitored daily and compile monthly.	Complied
5.10.2	Conversion rates shall be periodically updated to ensure accuracy against actual performance or industry average if appropriate.	The OER and KER is monitored daily and compile monthly. For CPO, the tank is measured daily to get previous day yield to calculate the conversion factor. For PK, the silo is measured daily to get previous day yield to calculate the conversion factor.	Complied
Processing D.6	The site 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 product including during transport and storage to strive for 100% separation.	This is not applicable as the certification is mass balance.	Not applicable
<b>5.6 Sales and goods out</b>			
5.6.1	The supplying site shall ensure that the following minimum information for RSPO certified products is made available in document form: The name and address of the buyer; <ul style="list-style-type: none"> <li>The name and address of the seller;</li> <li>The loading or shipment / delivery date;</li> <li>The date on which the documents were issued;</li> </ul>	No CPO sales as to date. Information in delivery notes for PK transfer (Bilala POM to Awala KCP) as per the following: <ul style="list-style-type: none"> <li>The name and address of the seller – Bilala POM</li> <li>The loading or shipment / delivery date – 29/8/19</li> <li>The date on which the documents were issued – 29/8/19</li> <li>A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations) – Mass balance</li> <li>The quantity of the products delivered – 9.72 mt</li> </ul>	Complied

	<ul style="list-style-type: none"> <li>• A description of the product, including the applicable supply chain model (Identity Preserved, Segregated or Mass Balance or the approved abbreviations);</li> <li>• The quantity of the products delivered;</li> <li>• Any related transport documentation;</li> <li>• Supply chain certificate number of the seller;</li> <li>• A unique identification number.</li> <li>• 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).</li> <li>• For sites that are required to announce and confirm trades in the RSPO IT platform, this shall include making Shipping Announcements / Announcements and Confirmations on the RSPO IT platform per shipment or group of shipments.</li> </ul>	<ul style="list-style-type: none"> <li>• Any related transport documentation – vehicle no. AK-375-IT</li> <li>• Supply chain certificate number of the seller – RSPO671034</li> <li>• A unique identification number – refer to DN no. 20190279</li> <li>• 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) - DN no. 20190329</li> <li>• For sites that are required to announce and confirm trades in the RSPO IT platform, this shall include making Shipping Announcements / Announcements and Confirmations on the RSPO IT platform per shipment or group of shipments – TR-e65214a6-6147, TR-6027e4a4-f212.</li> </ul>	
<b>5.7 Registration of Transactions</b>			
5.7.1	<p>Supply chain actors who:</p> <ul style="list-style-type: none"> <li>• Are mills, traders, crushers and refineries; and</li> <li>• Take legal ownership and/or physically handle RSPO Certified Sustainable oil palm products that are available in the yield scheme of the RSPO IT Platform (Figure 2 and 3, refer Annex 1) shall register their transaction in the RSPO IT platform and confirm upon receipt where applicable.</li> </ul>	<p>The registration of PalmTrace will be carried out by the General Manager of Sustainability in Head Office. All the transactions will be registered in the PalmTrace. Company has registered their mill in the PalmTrace with Member ID: Bilala Palm Oil Mill: RSPO_PO1000006576. The member category is Oil Mill.</p>	Complied
5.7.2	<p>The involved supply chain actors mentioned in 5.7.1 shall do the following actions in the RSPO IT Platform: Shipping Announcement / Announcement: When RSPO certified volume is sold as certified, the volumes of products that are in the yield scheme (Figure 2 and 3, refer Annex 1) shall be registered as a Shipping Announcement / Announcement in the RSPO IT Platform. The declaration time to</p>	<p>Shipping announcement of transactions of RSPO certified CPO and PK was done by General Manger of Sustainability in Malaysia in the RSPO IT Platform after the shipment has loaded. Sampled the shipping announcement 5.6.1</p> <p>Traceability (Mass Balance) Data Sheet and update at weekly basis by the mill and send to Sustainability Department.</p>	Complied

	<p>do Shipping Announcement / Announcement is based on members' own standard operating procedures.</p> <p>Trace: When RSPO certified volumes are sold as RSPO certified to actors in the supply chain beyond the refinery, the volume shall be traced at least annually. Tracing triggers the generation of a trace document with a unique traceability number. Tracing can be done in a consolidated way at least annually.</p> <p>Remove: RSPO certified volumes sold under other scheme or as conventional, or in case of underproduction, loss or damage shall be removed.</p> <p>Confirm: Acknowledge the purchase of RSPO certified volume by confirming Shipping Announcements / Announcements.</p>	<p>There was volume sold as conventional (refer to Table 11 &amp; 12; Supply Chain declaration of Table C &amp; D; Summary Template)</p> <p>Sampled of shipping announcement documents and found that the management done the shipping announcement accordingly. However, please refer to criteria 5.6.1.</p>	
<b>5.11 Claims</b>			
5.11.1	<p>The site shall only make claims regarding the use of or support of RSPO certified oil palm products that are in compliance with the RSPO Rules on Market Communications and Claims.</p>	<p>The procedure for claims is stated in Supply Chain and Traceability (Mass Balance Model) (Doc No: POM-SC/MB/001) dated 01/11/2019.</p>	Complied
<b>General corporate communications</b>			
4.1	<p>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.</p>	<p>The Annual Progress Update 2018 was referenced. No claims was identified that may lead consumers to believe that RSPO membership by itself implies the selling of RSPO-certified oil palm products</p>	Complied
4.2	<p>In corporate communications a member is allowed to:</p> <ol style="list-style-type: none"> <li>Display its RSPO membership status</li> <li>Display the RSPO web address (www.rspo.org)</li> </ol>	<p>In the website (<a href="https://www.olamgroup.com/products/food-staples/edible-oils.html">https://www.olamgroup.com/products/food-staples/edible-oils.html</a>), it only stated that Olam is fully supportive of the <a href="#">Roundtable on Sustainable Palm Oil (RSPO)</a> and we are working</p>	Complied

	<p>c. State that the member supports the work of the RSPO</p> <p>d. State the member’s history with regard to the RSPO.</p> <p>e. Use the RSPO trademark to promote its membership of the RSPO.</p> <p>Additionally, where an RSPO member displays the RSPO trademark in digital format this must be accompanied by the text ‘Check our progress at <a href="http://www.rspo.org">www.rspo.org</a>’ where the link must lead to the member’s profile page.</p>	towards a traceable and transparent palm oil supply chain. There is no other corporate communication found on the website.	
4.3	In corporate communications RSPO members must not make any statement that may lead consumers to believe that RSPO membership by itself implies the selling of RSPO-certified oil palm products.	The Annual Progress Update 2018 was referenced. No claims was identified 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.	The Annual Progress Update 2018 was referenced. No claims was identified that may lead consumers to believe that RSPO membership by itself implies the selling of RSPO-certified oil palm 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 was observed used in the website, documentations, banners, signage or t-shirt.	Complied
<b>Business to business communications</b>			
5.1	Business to Business communication relates to RSPO members in the supply chain selling to and/or communicating with other organizations in the supply chain about the use of certified sustainable oil palm products.	The only business to business communication is through the delivery documents. There is no use of trademark logo. Only the communication with RSPO certification number and supply chain model.	Complied
5.2	When confirming the sale of certified oil palm products, members must adhere to the requirements of the RSPO SCCS. This includes	The only business to business communication is through the delivery documents. There is no use of trademark logo. Only the communication with RSPO certification number and supply chain model.	Complied

	stating the supply chain model and certificate number under which the claim is being made.		
5.3	<p>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:</p> <p>a. If the distributor or wholesaler holds only a Distributor license, it may only communicate RSPO-certified oil palm products by linking the product to the manufacturer using the manufacturer's SCCS certificate number. This covers both brand and own brand products. However, in the case of own brand products it is essential that customers are aware that the product has been made on behalf of the distributor or wholesaler, with specific evidence either through on-pack claims or documentation.</p> <p>b. If the distributor or wholesaler is supply chain-certified they should follow the requirements outlined in section 5.2.</p>	Bilala Mill is not a distributor or wholesaler.	Not applicable
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>	<p>Bilala Mill is producing CPO and PK. The communication provided in the delivery documents has provided clear description of the products.</p> <p>There is no product labelling.</p>	Complied
<b>Business to consumer communication</b>			
6.1	Only RSPO members that have supply chain certification are allowed to make business to consumer claims about the certified	There is no business to consumer communication as this is an upstream activity certification.	Not applicable

	sustainable oil palm products contained within product(s), which are known as 'product-specific' claims. Product-specific claims are voluntary.		
6.2	Only RSPO members who have supply chain certification are authorised to use the RSPO trademark and/or RSPO label, with the exception of RSPO Credits and of retailers in accordance with 6.8 below.	There is no business to consumer communication as this is an upstream activity certification.	Not applicable
6.3	When on-pack claims on RSPO-certified sustainable oil palm products are used, the RSPO trademark and associated identification number must be present.	There is no business to consumer communication as this is an upstream activity certification.	Not applicable
6.4	Business to consumer communication shall not include information about the claimant's RSPO membership status.	There is no business to consumer communication as this is an upstream activity certification.	Not applicable
6.5	Members shall not communicate to consumers information about their suppliers' RSPO membership status.	There is no business to consumer communication as this is an upstream activity certification.	Not applicable
6.6	Use of the RSPO trademark is restricted to claims about RSPO-certified sustainable palm oil products and it is not authorised for use in relation to any other ingredient.	There is no business to consumer communication as this is an upstream activity certification.	Not applicable
6.7	Use of any other trademark or logo to highlight the presence of RSPO-certified sustainable oil palm products is an unauthorised product-specific claim.	There is no business to consumer communication as this is an upstream activity certification.	Not applicable
6.8	RSPO members who are retailers or food service companies can apply for an RSPO trademark license for use in business to consumer communications, provided they can demonstrate the validity of these claims to an RSPO-accredited certification body (CB). This will be undertaken via a remote audit, prior to the trademark use, during which the retailer or food service company will need to demonstrate that the use of the trademark is in	There is no business to consumer communication as this is an upstream activity certification.	Not applicable

	<p>compliance with the rules contained within this document and that the claim itself can be supported through a certified supply chain. Any other palm oil claims, including those highlighting the absence of palm oil, must be highlighted to the CB during the audit to ensure that all claims comply with the requirements of these rules. The CB will confirm the outcome of these audits, to be conducted annually, to RSPO who may continue to grant a trademark license or withdraw permission based upon the audit findings. This is in keeping with the rules applying to RSPO supply chain certified members. The guidance document for audits is available on <a href="http://www.rspo.org">www.rspo.org</a>.</p>		
<b>MODULE B – MASS BALANCE SPECIFIC RULES</b>			
<b>Minimum Mass Balance content</b>			
	<p>95% or above of the oil palm content must be RSPO MB-certified.</p>	<p>The MB volume that can be sold is only the volume requested in the PalmTrace. Hence the CPO or PK volume sold under MB model is considered 100% content.</p>	<p>Complied</p>
	<p>Where there is any percentage of non-certified oil palm within the product, the reason for this must be fully justified and an action plan for moving to fully certified oil palm must be in place, in accordance with the requirements of the RSPO SCCS. In addition, the non-certified volume must be covered by equivalent volume of RSPO Credits.</p>	<p>The MB volume that can be sold is only the volume requested in the PalmTrace. Hence the CPO or PK volume sold under MB model is considered 100% content.</p>	<p>Complied</p>
<b>Labelling and trademark (MB)</b>			
	<p>Members are allowed to use the RSPO label in one of the following ways:</p> <ul style="list-style-type: none"> <li>• Surrounded by the text: 'Certified sustainable palm oil'.</li> <li>• The RSPO label MUST contain the tag 'MIXED'. The tag MIXED designates oil palm products sourced under the Mass Balance</li> </ul>	<p>There is no on product claims</p>	<p>Not applicable</p>

	<p>(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.</p> <ul style="list-style-type: none"> <li>• The RSPO label can also include the statement: '[The palm oil contained in this product] contributes to the production of certified sustainable palm oil'.</li> <li>• Wherever the RSPO trademark is displayed, the applicable trademark license number must be shown immediately under or next to the trademark or the 'statement'. Font must be Calibri, font size must be at least 4 pt (1.4 mm or 0.06 inch).</li> <li>• In on-pack communications, the RSPO trademark can be printed anywhere on the pack. Further guidance on use of the trademark is provided in the RSPO Trademark License Terms and Conditions and in Annex 1 of the Rules on Market Communications &amp; Claims document.</li> </ul>		
<b>Messaging (MB)</b>			
	<p>Messaging ALLOWED in storytelling in product-related communications includes:</p> <ul style="list-style-type: none"> <li>• [Oil palm products]/[palm oil]/[palm kernel oil] from RSPO-certified mills and plantations were mixed with non-certified oil palm products in the supply chain.</li> <li>• The volume of [oil palm products]/[palm oil]/[palm kernel oil] in this product reflects an equivalent volume of palm oil or palm kernel oil produced by RSPO certified mills and plantations.</li> <li>• 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.</li> </ul>	<p>There is no on product claims</p>	<p>Not applicable</p>



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

	<p>75% IP + 20% SG =&gt; 95% SG claim is made          65% SG + 30% MB =&gt; 95% MB claim is made          55% MB + 40% B&amp;C =&gt; 95% partial product claim can be made          45% SG + 55% B&amp;C &lt; 50% B&amp;C claim can be made</p> <p>Where one supply chain model accounts for 95% of the oil palm content, the claim for this specific model may be made:</p> <p>95% IP + 5% MB =&gt; 95% IP IP claim can be made          95% SG + 5% MB =&gt; 95% SG SG claim can be made          95% MB + 5% C =&gt; 95% MB MB claim can be made</p>		
<p><b>Principle 4: Respect community and human rights and deliver benefit</b>          Respect community rights, provide equal opportunities, maximise benefits from engagement and ensure remediation where needed.</p>			
<p><b>Criteria 4.1</b>          The unit of certification respects human rights, which includes respecting the rights of Human Rights Defenders.</p>			
<p>4.1.1</p>	<p><b>(C)</b> A policy to respect human rights, including prohibiting retaliation against Human Rights Defenders (HRD), is documented and communicated to all levels of the workforce, operations, supply chain and local communities and prohibits intimidation and harassment by the unit of certification and contracted services, including contracted security forces.</p>	<p>Olam Palm Gabon has established Human Rights Policy approved by 1 September 2019. Olam is fully supports the United Nations Global Compact’s (UNGC) Guiding Principles on Business and Human Rights and commits to promote best practice throughout their activities. The company’s commitment to Human Rights is guided by the United Nations Declaration of Human Rights, the ILO Declaration on Fundamental Principles and Rights at Works and related international covenants. They take a proactive approach to respecting these rights in all their workplaces, supply chain, partners and in the communities in which they operated. The policy has outlined the labour rights, prohibition of child labour and forced labour, workplace condition, wage and benefits, diversity and inclusion, freedom of association and integrity &amp; business ethics. The grievance procedures allow access to redress and respect anonymity, protect complainants when requested,</p>	<p>Major non-conformance</p>

		<p>and monitor compliance to the policy. The company is committed to the proper disclosure of information in accordance with applicable regulations and accepted by industry practices.</p> <p>The policy has not been communicated to the relevant stakeholders such as internal employees and local communities as informed by the Social Responsible and confirmed by interviewed with the local communities. Thus, a major NC was raised.</p>	
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.	Olam prohibits any form of intimidation, harassment or violence, including the use of mercenaries and paramilitaries as stated in the policy above.	Complied
<b>Criteria 4.2</b>			
There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all affected parties.			
4.2.1	<b>(C)</b> The mutually agreed system, open to all affected parties, resolves disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants, HRD, community spokespersons and whistleblowers, where requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRD.	<p>Olam Palm Gabon has established Human Rights Policy dated 1 September 2019 where under workplace condition has clearly stated that:</p> <ul style="list-style-type: none"> <li>• All workplaces shall have in place a written process for grievance resolution.</li> <li>• It shall clearly specify responsible authority, escalation mechanism and process for resolving issues raised.</li> <li>• It shall have provision for keeping the name of the complainant confidential.</li> <li>• There shall not be any discrimination or punitive action against any employee raising a grievance.</li> </ul> <p>The grievance process should be clearly communicated to all employees.</p>	Complied
4.2.2	Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties.	Olam Palm Group has developed the Procedure of Management of Complaints and Claims with N° Document: SOP N°07/CRS/Mouila/ 0119, Ver. 02 dated January 2019 approved by the Vice President of Plantation. The objectives of the procedure is to have better	Minor non-conformance

		<p>consideration to the internal and external complaints and claims and provides a clear, appropriate and understandable response to the complaints and claims. As per the procedure, the complaint shall be registered into the SocProg software after 48 hours from the date of receipt and investigation will be conducted within 5 days from the date of receipt of complaint. Timeframe to resolve the complaint is clearly</p> <p>The procedure has been briefed to the local communities in Lot 1 on 21/9/2019, 24/9/2019, 26/9/2019, 28/9/2019 and 19/10/2019. Seen the Report of Establishment of Survey Committee and Explanation on Complaints and Claims Procedure.</p> <p>Procedure of Management of Complaints and Claims with Doc. No.: SOP N07/CRS/Mouila/ 0119, Ver. 02 dated January 2019 was developed. However, reviewed on the complaint forms received in Lot 1 on 30/8/2019 and 11/10/2019 were not registered in the SocProg software within the set timeframe as per SOP.</p> <p>In Moutassou Lot 3, there was a complaint received on 18/10/2019 from one of the driver related to the potential discrimination by the Manager. However, there was no evidence to show that the call-up meeting with the complainant was done within 2 days and no investigation could be taken without the call-up meeting with the complainant. The complaint is still open and unresolved. Thus, a minor NC was raised.</p>	
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.	<p>There were total 6 external complaints received from communities since last audit.</p> <p>Mouila Lot 1 has implemented complaint logbook to register internal complaint. Total 7 complaints received and 4 complaints have resolved. 1 complainant has transferred to Lot 3 (transferred letter???). 1 complaint still is open and 1 complaint refused to accept the decision from the management.</p>	Minor non-conformance

		<p>During the interview with villagers, it was informed that there are elephant attack on their crops. Such grievance has been informed to OPG CRS team. However there are no records found of such grievance. CRS team informed the assessment team that these shall be managed by the Authorities. Despite that it shall be managed by the Authorities, OPG has not able to demonstrate the execution of dealing with complaints or grievances received.</p> <p>Furthermore, the assessment team during Mboukou housing visit found that one of the florescent light in the living room was not in place and water-tap in the toilet was leaking. Interviewed with the residents informed that these issues happened and has reported to CDQ since 8 months ago. However, no evidence to show that the complaint has been documented and entertained.</p> <p>In addition, interviewed with the local community in Mboukou Village confirmed that no communication/ update on the status and progress of the complaint related to the dead fish in the trenches. A proactive solution shall be taken by the company rather than awaiting for resolution.</p> <p>One of the complainant of sexual harassment in Mboukou informed that she has reported to her superior (Doctor) on the safety issue of one female nurse to work a night shift. Cross-check with HR Manager confirmed that this issue has been raised. No evidence to show that the complaint has been documented and entertained. Thus a minor NC was issued.</p>	
4.2.4	The conflict resolution mechanism includes the option of access to independent legal and technical advice, the ability for complainants	Olam fully supports the United Nations Global Compact's (UNGC) Guiding Principles on Business and Human Rights and commits to promote best practice throughout our activities. Under Clause 31 in the guidelines, it has stated to ensure that aggrieved parties have	Minor non-conformance

	to choose individuals or groups to support them and/or act as observers, as well as the option of a third-party mediator.	reasonable access to sources of information, advice and expertise necessary to engage in a grievance process on fair, informed and respectful terms. However, it is not clearly outline in the Human Rights Policy which made reference to the Guiding Principles on Business and Human Rights. Thus a minor NC was issued.	
<b>Criteria 4.3</b> The unit of certification contributes to local sustainable development as agreed by local communities.			
4.3.1	Contributions to community development that are based on the results of consultation with local communities are demonstrated.	<p>Local contribution to local developments are based on result from consultation with local communities. The Social Contract dated 28/05/2015 and extension of Social Contract dated 03/2017 for Mouila Lot 3 covering Mbadi Village, Moutassou Village, Mouladoufouala Village, Okoumbou Makanda Village, Ikolo Village, Koumbanou Maramba Village and Douya Village indicated the required from the communities. The implementation of the social contract is still in progress. The assessment team had able to observe the installation of solar street lights, water bore-well at Douya and Koumbanou/ Maramba villages. Moreover, the villagers from Koumbanou/ Maramba have informed the auditor during village visit that Olam has provided them with the sugarcane planting materials and helped them in the land preparation</p> <p>Steering Committee was established to discuss and monitor the progress of Social Contract. The committee consists of representatives of the local communities, local authorities and Olam. The last meeting held on 13/11/2019 in Lot 3. During the meeting, the representative from Bavanga village has complimented about the improvement on pedestrian bridge at the elephant trenches in the village to allow them to access and transport their crops.</p> <p>Besides, the company has organized an awareness training on fire burning in savannah with all the local communities in Lot 3. Seen the</p>	Complied

		<p>training report and interviewed with the local communities confirmed that they have attended the training.</p> <p>Sampled one of the requests in Social Contract for Iroungou Village for the agricultural activities in the village. Olam has collaborated with the Agriculture Department on the preparation for the land and the cultivation of the activities. Seen the Cassava Planting Activity letter dated 15/11/2019. The land has been cleared and waiting for planting activities.</p> <p>The management in Lot 1 has provided land for the villagers for income generating cultivation purpose. For eg: site visit sighted that there was a land planted with cassava in Doubou village.</p>	
<p><b>Criteria 4.4</b>          Use of the land for oil palm does not diminish the legal, customary or user rights of other users without their free, prior and informed consent.</p>			
<p>4.4.1</p>	<p><b>(C)</b> Documents showing legal ownership or lease, or authorised use of customary land authorised by customary landowners through a Free, Prior and Informed 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>The historical use of land was documented in the SEIA and HCV assessment. There was no change of concession area. The legal right usage of OPG is as per the previous assessment finding. Legal use rights are obtained.</p> <p>The consent to use the land has been documented. The consent for Rembo village was given on 20/07/2012 while for Guidouma was given on 21/07/2012.</p>	<p>Complied</p>

<p>4.4.2</p>	<p>Copies of documents evidencing agreement-making processes and negotiated agreements detailing the FPIC process are available and include:</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>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>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>The negotiation to achieve FPIC is to establish social contract where each villages have provided Olam the list of project to be delivered by OPG. The Social Contract was dated 30/07/2012.</p> <p>In Lot 1, it was recorded that 2 villages has withhold their consent to the OPG Mouila development. The 2 recorded villages are Mouladoufouala and Moudouma. With withhold of the villages, portion of the development involved with the villages are kept as conservation for the village access.</p> <p>The concession developed by OPG is land leased from the government. The lease is 99 years. Upon expiring of the land lease, the land will be surrender to the government. The SEIA has identified that upon expiring of the land lease, the restoration to conservation of the mill land is required.</p>	<p>Complied</p>
<p>4.4.3</p>	<p><b>(C)</b> Maps of an appropriate scale showing the extent of recognised legal, customary or user rights are developed through participatory mapping involving affected parties (including neighbouring communities where applicable, and relevant authorities).</p>	<p>The mapping of the customary and user rights are developed in participatory. This has been established in the SEIA and HCV assessment. Confirmation with villagers was obtained that they have participated in identifying the land and usage of the land. Maps copy is retained by the affected communities. Soft copy of the maps are available.</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.</p>	<p>The SEIA; social contracts; meeting minutes; procedures; maps are all provided in French which is the main language in Gabon.</p>	<p>Complied</p>



4.4.5	<b>(C)</b> Evidence is available to show that communities are represented through institutions or representatives of their own choosing, including by legal counsel if they so choose.	Discussion with Guidoumo village that they have selected their own representative to negotiate with OPG. There was not legal counsel representing the village. The village chief confirmed that there is no required legal counsel.	Complied
4.4.6	There is evidence that implementation of agreements negotiated through FPIC is annually reviewed in consultation with affected parties.	Steering Committee meeting with the villager representatives was held on 25/10/2019 for Lot 1. Part of the discussion was the fulfilment of the Social Contract which was part of the agreement that the villagers consent for OPG Mouila for this development.  Despite the meeting was carried out, the management plan to execute all outstanding social contract or those amendments to the social contract are not documented with timeframe to complete and agreed with the affected parties. The social contract execution was also highlighted by the Mouila Prefect that it is outdated and poor in execution. Thus, a minor NC was issued.	Minor non-conformance
<b>Criteria 4.5</b>			
No new plantings are established on local peoples' land where it can be demonstrated that there are legal, customary or user rights, without their FPIC. This is dealt with through a documented system that enables these and other stakeholders to express their views through their own representative institutions.			
4.5.1	<b>(C)</b> Documents showing identification and assessment of demonstrable legal, customary and user rights are available.	The assessment of the legal, customary and user rights are documented in Lot 1 the SEIA dated May 2012. The assessment was conducted with participatory with the villagers. The participatory was confirmed during the interview with the selected villages.	Complied
4.5.2	<b>(C)</b> FPIC is obtained for all oil palm development through a comprehensive process, including in particular, full respect for their legal and customary rights to the territories, lands and resources via local communities' own representative institutions, with all the relevant information and documents made available, with option of resourced access to independent advice through a documented, long-term and two-way process of consultation and negotiation.	The assessment of the legal, customary and user rights are documented in Lot 1 the SEIA dated May 2012. The assessment was conducted with participatory with the villagers. The participatory was confirmed during the interview with the selected villages. The main negotiation of the consent for OPG's development is the agreement of social contract. Meeting minutes and attendance evidences for conducting the consultation and negotiation is retained.	Complied

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. Negotiated agreements are non-coercive and entered into voluntarily and carried out prior to new operations.	In Lot 1, it was recorded that 2 villages has withhold their consent to the OPG Mouila development. The 2 recorded villages are Mouladoufouala and Moudouma. With withhold of the villages, portion of the development involved with the villages are kept as conservation for the village access.	Complied
4.5.4	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.	The SEIA and HCV assessment reports have documented the FPIC process including identification of food source, cultivation land and water source.	Complied
4.5.5	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.	The affected communities has been provided with the appropriate procedures. Social contract negotiated for agreement to allow OPG to develop the land is available and kept by the affected communities.	Complied
4.5.6	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.	The consent from Guidouma and Rembo village was given to OPG in July 2012 while OPG has received the land less agreement issued by the Ministry of Economy of Employment and Sustainability on 13/11/2012.	Complied
4.5.7	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.	There is no more new land development or expansion for OPG Mouila concession. All planting has been completed in 2017.	Complied
4.5.8	<b>(C)</b> New lands are not acquired in areas inhabited by communities in voluntary isolation.	There is no more new land development or expansion for OPG Mouila concession. All planting has been completed in 2017.	

			Complied
<b>Criteria 4.6</b>			
Any negotiations concerning compensation for loss of legal, customary or user rights are dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.			
4.6.1	<b>(C)</b> A mutually agreed procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, is in place.	The customary and user rights procedure was established following to Decree no 692/PR/MEFEPEPN dated 24/08/2004.  The villager access card introduced by OPG had demonstrated that villagers remained their rights to activity such as harvesting forest products; agriculture activities; hunting and fishing; collecting of firewood and usage of water. Sample of the access card from Okoumbou, Guidouma and Koumbanou was verified.	Complied
4.6.2	<b>(C)</b> A mutually agreed procedure for calculating and distributing fair and gender-equal compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation.	The compensation procedure was established following the Decree No 1016/PR/MAEPDR. The compensation procedure was established from discussion and validation by the Project Steering Committee on 02/08/2012.  There were no compensation observed since previous assessment until now.	Complied
4.6.3	Evidence is available that equal opportunities are provided to both men and women to hold land titles for small holdings.	There are no land titles hold by the local villagers. The local villagers involved in this development are only have land use access rights. However, negotiation of land use access was observed that both men and women have the rights to negotiate. During this assessment, the assessment team had able to interview 7 villages. Out of 7 villages, 3 villages are head by female.	Complied
4.6.4	The process and outcomes of any negotiated agreements, compensation and payments are documented, with evidence of the participation of affected parties, and made publicly available to them.	The social contracts are the main negotiation agreement to give consent to OPG for this development. The agreements are made available to the villager. During the villagers' engagement, it was observed that a copy of the social contract is available.	Complied

		The negotiation of the social contract is also endorsed by the Provincial Prefect and the Governor of Ngounie Province.	
<b>Criteria 4.7</b>			
Where it can be demonstrated that local peoples have legal, customary or user rights, they are compensated for any agreed land acquisitions and relinquishment of rights, subject to their FPIC and negotiated agreements.			
4.7.1	<b>(C)</b> A mutually agreed procedure for identifying people entitled to compensation is in place.	The compensation procedure was established following the Decree No 1016/PR/MAEPDR. The compensation procedure was established from discussion and validation by the Project Steering Committee on 02/08/2012. There were no compensation observed since previous assessment until now.	Complied
4.7.2	<b>(C)</b> A mutually agreed procedure for calculating and distributing fair compensation (monetary or otherwise) is in place and documented and made available to affected parties.	The compensation procedure was established following the Decree No 1016/PR/MAEPDR. The compensation procedure was established from discussion and validation by the Project Steering Committee on 02/08/2012. There were no compensation observed since previous assessment until now.	Complied
4.7.3	Communities that have lost access and rights to land for plantation expansion are given opportunities to benefit from plantation development.	OPG has provided direct work opportunity to the local villagers at the estates and mill. OPG has developed agriculture program with local village to cultivate cassava and sugar cane for income generation.	Yes
<b>Criteria 4.8</b>			
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.	OPG did not acquired any land. The land was leased from the Gabonese government. However, OPG has observed the FPIC process to determine for any crops compensation. The crop compensation was completed in 2012.	Complied

		The land use rights was determined in participatory method as reported in the SEIA which was confirmed the participatory was carried out during the interview with the stakeholders.	
4.8.2	<b>(C)</b> Land conflict is not present in the area of the unit of certification. Where land conflict exists, acceptable conflict resolution processes (see Criteria 4.2 and 4.6) are implemented and accepted by the parties involved. In the case of newly acquired plantations, the unit of certification addresses any unresolved conflict through appropriate conflict resolution mechanisms.	There was no land dispute observed during this assessment. However there was a request from Mboukou Village on 04/11/2019 to extent the land boundaries limit for their customary activities. OPG has agree to conduct a verification with the Forest Administration prior extending.	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)	All customary and user rights was identified with participatory from the land users. This was conducted prior to the development while it has been documented in the SEIA and HCV assessment submitted for the New Planting Procedures.	Complied
4.8.4	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)	Despite there was no land dispute identified in this assessment, there was no specific resolution mechanism for land conflict or dispute especially documented mechanism including participatory mapping involving affected parties. The Complaints and complaints management procedure dated January 2019 does not provide sufficient guidance. Thus a minor NC was raised.	Minor nonconformance
<b>Principle 5: Support smallholder inclusion</b>			
Include smallholders in RSPO supply chains and improve their livelihoods through fair and transparent partnerships.			
<b>Criteria 5.1</b>			
The unit of certification deals fairly and transparently with all smallholders (Independent and Scheme) and other local businesses.			
5.1.1	Current and previous period prices paid for FFB are publicly available and accessible by smallholders.	The mill does not receive FFBs from out-growers. There are no smallholder surrounding OPG Mouila. The FFB collection data at the mill was verified to confirm all FFBs are from Lot 1, Lot 2, Lot 3 and Ndende.	Not applicable

5.1.2	<b>(C)</b> Evidence is available that the unit of certification regularly explains the FFB pricing to smallholders.	The mill does not receive FFBs from out-growers. There are no smallholder surrounding OPG Mouila. The FFB collection data at the mill was verified to confirm all FFBs are from Lot 1, Lot 2, Lot 3 and Ndende.	Not applicable
5.1.3	<b>(C)</b> Fair pricing, including premium pricing, when applicable, is agreed with smallholders in the supply base and documented.	The mill does not receive FFBs from out-growers. There are no smallholder surrounding OPG Mouila. The FFB collection data at the mill was verified to confirm all FFBs are from Lot 1, Lot 2, Lot 3 and Ndende.	Not applicable
5.1.4	<b>(C)</b> Evidence is available that all parties, including women and independent representative organisations assisting smallholders where requested, are involved in decision-making processes and understand the contracts. These include those involving finance, loans/credits, and repayments through FFB price reductions for replanting and or other support mechanisms where applicable.	The mill does not receive FFBs from out-growers. There are no smallholder surrounding OPG Mouila. The FFB collection data at the mill was verified to confirm all FFBs are from Lot 1, Lot 2, Lot 3 and Ndende.	Not applicable
5.1.5	Contracts are fair, legal and transparent and have an agreed timeframe.	The mill does not receive FFBs from out-growers. There are no smallholder surrounding OPG Mouila. The FFB collection data at the mill was verified to confirm all FFBs are from Lot 1, Lot 2, Lot 3 and Ndende.	Not applicable
5.1.6	<b>(C)</b> Agreed payments are made in a timely manner and receipts specifying price, weight, deductions and amount paid are given.	The mill does not receive FFBs from out-growers. There are no smallholder surrounding OPG Mouila. The FFB collection data at the mill was verified to confirm all FFBs are from Lot 1, Lot 2, Lot 3 and Ndende.	Not applicable
5.1.7	Weighing equipment is verified by an independent third party on a regular basis (this can be government).	Despite that OPG Mouila does not received FFBs from out-growers, the weighbridge has been calibrated. For weighbridge 142250133, the validity of the calibration is until 04/03/2020 while for weighbridge 144750404 the validity of the calibration is until 06/09/2020	Complied
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.	There are no smallholders surrounding OPG Mouila.	Not applicable

5.1.9	<b>(C)</b> The unit of certification has a grievance mechanism for smallholders and all grievances raised are dealt with in a timely manner.	The mill does not receive FFBs from out-growers. There are no smallholder surrounding OPG Mouila. The FFB collection data at the mill was verified to confirm all FFBs are from Lot 1, Lot 2, Lot 3 and Ndende.	Not applicable
<b>Criteria 5.2</b>			
The unit of certification supports improved livelihoods of smallholders and their inclusion in sustainable palm oil value chains.			
5.2.1	The unit of certification consults with interested smallholders (irrespective of type) including women or other partners in their supply base to assess their needs for support to improve their livelihoods and their interest in RSPO certification.	The mill does not receive FFBs from out-growers. There are no smallholder surrounding OPG Mouila. The FFB collection data at the mill was verified to confirm all FFBs are from Lot 1, Lot 2 and Lot 3.	Not applicable
5.2.2	The unit of certification develops and implements livelihood improvement programmes, including at least capacity building to enhance productivity, quality, organisational and managerial competencies, and specific elements of RSPO certification (including the RSPO Standard for Independent Smallholder).	The mill does not receive FFBs from out-growers. There are no smallholder surrounding OPG Mouila. The FFB collection data at the mill was verified to confirm all FFBs are from Lot 1, Lot 2 and Lot 3.	Not applicable
<b>PROCEDURAL NOTE:</b>			
The RSPO is currently developing a separate standard for Independent Smallholders.			
5.2.3	Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production.	The mill does not receive FFBs from out-growers. There are no smallholder surrounding OPG Mouila. The FFB collection data at the mill was verified to confirm all FFBs are from Lot 1, Lot 2 and Lot 3.	Not applicable
5.2.4	<b>(C)</b> Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling.	The mill does not receive FFBs from out-growers. There are no smallholder surrounding OPG Mouila. The FFB collection data at the mill was verified to confirm all FFBs are from Lot 1, Lot 2 and Lot 3.	Not applicable
5.2.5	The unit of certification regularly reviews and publicly reports on the progress of the smallholder support programme.	The mill does not receive FFBs from out-growers. There are no smallholder surrounding OPG Mouila. The FFB collection data at the mill was verified to confirm all FFBs are from Lot 1, Lot 2 and Lot 3.	Not applicable
<b>Principle 6: respect workers' rights and conditions</b>			

Protect workers' rights and ensure safe and decent working conditions.			
<b>Criteria 6.1</b> Any form of discrimination is prohibited.			
6.1.1	<b>(C)</b> A publicly available non-discrimination and equal opportunity policy is implemented in such a way to prevent discrimination based on ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age.	Olam Palm Gabon has developed "The Olam Code of Conduct" dated February 2016 where the company provides equal opportunity of employment to all the people without regard to the employee's race, colour, religion, sex, age, national origin, sexual orientation, disability, citizenship status, marital status and etc. Besides, "Olam Fair Employment Policy" dated September 2018 has established to create a fair and non-discriminatory workplace that provides equal opportunity to everyone. The HR Department briefs the policy to all the workers during induction training.	Complied
6.1.2	<b>(C)</b> Evidence is provided that workers and groups including local communities, women, and migrant workers have not been discriminated against. Evidence includes migrant workers' non-payment of recruitment fees.	Reviewed on the Employee Master Listing found that it consists of local communities and foreign workers. They are treat equally without any discrimination verified through interviewed. Interviewed with the foreign workers found that they did not pay any recruitment fee prior to work in Olam to anyone in their home country. All the costs are bear by the company.	Complied
6.1.3	The unit of certification demonstrates that recruitment selection, hiring, access to training and promotion are based on skills, capabilities, qualities and medical fitness necessary for the jobs available.	Verified the Assessment Checklist for Candidate and New Employee Evaluation of technical questions found that the recruitment process is based on the skills and capabilities of the candidates for local workers. For recruitment of foreign workers, medical check-up will be conducted to ensure the candidates are fit to work as per the Foreign Workers' Recruitment Policy.	Complied
6.1.4	Pregnancy testing is not conducted as a discriminatory measure and is only permissible when it is legally mandated. Alternative equivalent employment is offered for pregnant women.	Pregnancy testing is automatically included in the process of medical check-up prior recruitment. However, this will not be the reason of not employing the pregnant women. Interviewed with the female workers and HR Manager confirmed that the pregnant women will have job opportunities without any discrimination. The testing was carried out	Complied



		just to ensure that no chemical handling job was assigned to the pregnant women.	
6.1.5	<b>(C)</b> A gender committee is in place specifically to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women.	President of Gender Committee has informed that the function of the Gender Committee established and she has informed to the female workers regarding the function of Gender Committee. Besides, there was an awareness training on Gender Committee conducted on 31/1/2019 – 2/2/2019 to all the workers at the biometric centre in PK19 and Mboukou 1. Seen the meeting minutes of the training. The role of the Gender Committee is to identify and address issues of concern as well as opportunities and improvement for women during Gender Committee quarterly meeting.	Complied
6.1.6	There is evidence of equal pay for the same work scope.	Reviewed on the 43 payslips in Lot 1 and Lot 3 which consists of male and female workers found that their salary are the same for the same job scope. For the worker category, OE1AA is getting 675 CFA francs per hour with 15,000 CFA francs of housing allowance for the workers who are staying outside the housing complex.	Complied
<b>Criteria 6.2</b>			
Pay and conditions for staff and workers and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages (DLW).			
6.2.1	<b>(C)</b> 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.	There was collective agreement made in French and signed by the delegates where it has stated the pay and conditions of working in the plantations which in accordance to Gabon - Code du travail 1994. Employment contracts for the local workers were in French that has elaborated the salary, working hours and benefit entitlement. The employment contract for Indonesian worker was in Bahasa Indonesia with the salary, annual leave and the allowances stated clearly.	Complied
6.2.2	<b>(C)</b> Employment contracts and related documents detailing payments and conditions of employment (e.g. regular working	Collective agreement, employment contracts and Human Resource Manual (updated 2015) were sighted. Sampled total 43 employment	

	<p>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>contracts for local workers, 7 employment contracts for Indonesian workers and 9 employment contracts for contractors' workers. It has clearly stated that the payment 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) in the employment contract for Olam local and Indonesia workers.</p> <p>However, sampled employment contract for Contrat A Duree Determinee (CDD) found that the period has exceeded 2 years as per the Gabon - Code du travail 1994 as below:</p> <ul style="list-style-type: none"> <li>i. Employee No.: 063292 (joined on 9/1/2018; period: 21/7/2018 – 20/1/2020)</li> <li>ii. Employee No.: 052963 (joined on 9/1/2018; period: 21/7/2018 – 20/1/2020)</li> <li>iii. Employee No.: 052456 (joined on 13/12/2017; period: 21/6/2018 – 20/12/2020)</li> <li>iv. Employee No.: 052058 (joined on 5/12/2017; period: 21/6/2018 – 20/12/2020)</li> <li>v. Employee No.: 052506 (joined on 15/12/2017; period: 21/6/2018 – 20/12/2020)</li> </ul> <p>However, reviewed the employment contract for contractors' workers found that wages (rate per piece), sick leave, holiday entitlement and maternity leave has yet to be included in the employment contract. Besides, there was no specific fixed-term period for the Contrat A Duree Determinee (CDD) workers stated in the employment contract for contractors' workers. Sampled of the employment contracts as below:</p> <ul style="list-style-type: none"> <li>i. CNSS No.: 001-1118794-4 (Lot 3)</li> <li>ii. CNSS No.: 040-1404488-8 (Lot 3)</li> <li>iii. CNSS No.: 040-1404486-6 (Lot 3)</li> <li>iv. CNSS No.: 040-1404490-0 (Lot 3)</li> </ul>	<p>Minor non-conformance</p>
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6.2.3	<p><b>(C)</b> There is evidence of legal compliance for regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice and other legal labour requirements.</p>	<p>The workers scanned their attendance at the biometric centre in main office. Besides, the supervisor will record in the Supervisor’s Daily Record (SDR) if there is any overtime, raining pay and etc. Sampled 7/10/2019 and the workers have been paid accordingly to the Collective Agreement for the raining day wages. Interviewed with the workers found that they have holiday and maternity leave entitlement. The period of notice is accordance to the Gabon - Code du travail 1994.</p>	Complied
6.2.4	<p><b>(C)</b> 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>There are total 770 and 600 completed units of housing facilities at Lot 1 and Lot 3 respectively. 70 and 180 units of housing still in progress in Lot 1 and Lot 3 and targeted to be completed on December 2019. Olam is providing free transportation to transport all workers (both permanent and temporary) from villages to the plantations. On top of that, permanent workers who are staying outside received CFA 15,000 as housing allowance.</p> <p>The assessment team visited the housing compound. Water and sanitation are available in the each house. It was observe that water treatment facility is available to treat and provide clean water to the houses. Interview conducted with residents evident that water and electricity are free of charge.</p>	Complied

		Clinic is available to all the workers. The clinic provide first treatment for any reported disease / illness of national workers if it is report during work hours. After the first treatment, the doctor will provide referral to the national healthcare centre / hospital for further treatment where National Insurance covers the national workers.	
6.2.5	The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food.	The local workers are mainly staying in nearby towns. For those local workers and foreign workers that are staying in the estate, there are stores setup for them to buy their daily needs. The price of the items sold is appropriately priced. Interviewed with the workers confirmed that the price differences are minimal. Furthermore, the foreign workers are able to freely moving to Mouila town to purchase their food. The company has provided free transportation to send the workers to Mouila town to purchase their groceries.	Complied
6.2.6	A DLW is paid to all workers, including those on piece rate/quotas, for whom the calculation is based on achievable quotas during regular work hours.	Prevailing wages calculation is carried out based on the guideline published by RSPO. The prevailing wages was calculated for national workers and foreign workers as well as the onsite living and offsite living. The in-kind benefits such as electricity, housing and school expenses are part of the prevailing wages.  Acknowledge that the calculation of prevailing wages was only published 1 week before the assessment, hence the remaining in-kind benefit e.g. water supply and the medical expenses provided by the company to the workers to be included. This issue raised as OFI @ opportunity for improvement.	Complied

**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	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.	Document reviewed on the employment contract found that the workers with Contrat A Duree Determinee (CDD) – Fixed Term Employment (Temporary workers as defined by ILO) are working for core work such as harvesting, manuring, spraying, mill operators and etc. Thus, a minor NC was raised.	Minor non-conformance
<p><b>Criteria 6.3</b></p> <p>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	<b>(C)</b> A published statement recognising freedom of association and right to collective bargaining in national languages is available and is explained to all workers in languages that they understand, and is demonstrably implemented.	Olam Palm Gabon has established Human Rights Policy approved on 1 September 2019 where the company promotes freedom of association and collective bargaining. The workers shall have the rights to join or to refrain from joining, representative associations of their choice and to bargain collectively. The management shall develop alternate internal processes for collaborating with workers in managing workplace affairs such as Joint Consultative Council if the right to freedom of association is restricted under law. The policy is in bilingual, English and French and it is communicated to the workers during induction training. The management has able to demonstrate that they have implemented the policy by respecting the rights of workers to have freedom of association. Delegate Committee was established transparently by the vote of all the workers.	Complied
6.3.2	Minutes of meetings between the unit of certification with trade unions or workers representatives, who are freely elected, are documented in national languages and made available upon request.	<p>There will have two meeting in a month where 1 of the meeting was between the management and the delegates and another is among the delegates themselves. Seem the meeting minutes of the meetings conducted.</p> <p>There was an ad-hoc meeting conducted on 21/10/2019 and monthly meeting with management on 31/10/2019. However, meeting minutes for these two meetings were not retained by the company and was not available during the audit. Thus, a minor issued was raised</p>	Minor non-conformance

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.	Delegate Election was held on 28-29/6/2017 and 1/7/2017. National Union such as C.G.S.L, C.D.S.A and O.U.S.T have submitted the name of the delegates to be participate in the election. Seen the minutes of the delegate election and the management does not involved in the formation of the Delegates Committee. The whole process of election was transparent under the involvement of the National Union. HR Department was only involved in the calculation of the votes in the presence of the Bureau Member who consisted of National Union representatives. Interviewed with the workers confirmed that the management does not interfere with the formation and election of the delegates. The workers elect all the representatives.	Complied
<b>Criteria 6.4:</b> 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.	<p>Olam Palm Gabon has established Human Rights Policy approved on 1 September 2019 where the company shall not allow use of child labour or forced labour, either directly or through a subcontractor. The minimum age for admission to any type of employment or work that by its nature or the circumstances in which it is carried out is likely to jeopardize the health, safety or morals the individual shall not be less than 18 years.</p> <p>In addition, the "The Olam Code of Conduct" and "Olam Fair Employment Policy" dated September 2018 where the minimum age required by law for a person to work and shall not be less than 18 years old.</p> <p>Besides, the suppliers shall also complying with International Labour Organization (ILO) Convention 138 on the Minimum Age of Employment and Convention 182 on the Worst Forms of Child Labour as stated in the "Olam Supplier Code".</p>	Complied

		<p>Reviewed on the Employee Master Listing and interviewed with the workers found that no children are working in the plantations.</p> <p>Refer to indicator 2.2.3 for the non-conformance raised.</p>	
6.4.2	<p><b>(C)</b> There is evidence that minimum age requirements are met. Personnel files show that all workers are above the national minimum age or above company policy minimum age, whichever is higher. There is a documented age screening verification procedure.</p>	<p>Based on interviewed with HR Manager that they will have a screening process of age prior to recruitment through birth certificate and identification card. Document reviewed on the Employee Master Listing confirmed that no child under 18 years old was employed.</p> <p>The company has developed a Procédure de Recrutement with Ref. No.: 2708/2016RH/JB), Ver. 1 dated 27/8/2016 where it has clearly stated that during hiring interview, the applicant needs to bring along their national identification card and certified true copy of birth certificate before employment.</p>	Complied
6.4.3	<p><b>(C)</b> Young persons may be employed only for non- hazardous work, with protective restrictions in place for that work.</p>	<p>There was no young person employed by the company as their minimum age was 18 years old. This has verified with the Employee Master Listing.</p>	Complied
6.4.4	<p>The unit of certification demonstrates communication about its 'no child labour' policy and the negative effects of child labour, and promotes child protection to supervisors and other key staff, smallholders, FFB suppliers and communities where workers live.</p>	<p>The company has briefed to all the workers and contractors on the 'no child labour' policy. There was a specific clause on no child labour to be employed in the agreement between the company and contractor (agricultural services). Interviewed with the contractor confirmed that they were briefed and understood the 'no child labour' policy in Olam. Besides, the company has putting effort to construct schools in the villages and inside the premises to enable the children have access to education.</p>	Complied
<p><b>Criteria 6.5:</b> There is no harassment or abuse in the workplace, and reproductive rights are protected.</p>			
6.5.1	<p><b>(C)</b> A policy to prevent sexual and all other forms of harassment and violence is implemented and communicated to all levels of the workforce.</p>	<p>Olam Palm Group has established "Olam Sexual Harassment in the Workplace Policy" dated September 2018 where the company is committed to maintaining a positive work environment and will not</p>	

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		<p>tolerate acts of sexual harassment or related retaliation against or by any employee or manager. Awareness training of the policy was conducted on 31/1/2019 – 2/2/2019 during morning muster.</p> <p>Based on the interview and review on the complaint forms, it was found that a reported sexual harassment case was resolved but the complainant did not aware on the results of investigation and was not satisfied with the resolution. In this case, the respondent was issued with a warning letter. Furthermore, she is not comfortable to work in the same environment with the respondent.</p> <p>Based on the Sexual Harassment in Workplace Policy, the complainant did not received the report and the action taken has not considered agreement with the parties. Furthermore, after the resolution, there were no further protection to the complainant from exposing to the respondent. As such, the action taken has not demonstrated prevention and repetition of harassment.</p> <p>Thus, a major NC was issued.</p>	Major non-conformance
6.5.2	<b>(C)</b> A policy to protect the reproductive rights of all, especially of women, is implemented and communicated to all levels of the workforce.	Human Rights Policy approved on 1 September 2019 where Olam provides an environment free from discrimination and harassment or abuse in the work place, and reproductive rights are protected with full implementation of all relevant articles of Gabon labor code (Article 170 to 175). Awareness training of the policy was conducted on 31/1/2019 – 2/2/2019 during morning muster.	Complied
6.5.3	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.	As per Gabon - Code du travail 1994, Article 174, the new mothers has the right to rest periods for breast-feeding for 12 months with 2 hours a day for the first 6 months and 1 hour a day for the last 6 months. Olam has developed Human Resources Guidelines, Section C1: Pregnancy and Maternity, Subsection 3 Rest for breastfeeding in accordance to the regulation. Interviewed with the females workers found that they are preferred to have day off on Friday and Saturday	Complied



		<p>instead of break time on every working day. Therefore, the management has given off day on Friday and Saturday on the first 6 months and off day on Saturday on last 6 months to the breast-feeding mother.</p>	
<p>6.5.4</p>	<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>Whistleblowing Policy revised on June 2019 was developed to set out the guidelines and internal processes that apply when a report setting out a person's suspicions or concerns of inappropriate conduct is made. The policy encourages employees to raise concerns directly with their supervisor, local HR manager or via Olam whistleblowing channel. Once a written complaint is made, person designated will investigate the complaint within 15 dates as outlined in "Olam Sexual Harassment in the Workplace Policy". The identity of complainant will be protected and status of the complaint will be informed within a month. Besides, a <i>Procédure de lute contre le harcèlement sexuel et la discrimination en milieu professionnel</i> with Doc. No.: SOP 1 dated 1/1/2018. The objective of the procedure is to define the management mode of complaint due to sexual harassment and discrimination in the workplace. The process of complaint was clearly stated in the procedure. A committee will be set-up within 2 days and a call-up meeting with the complainant will be carry out within the following 2 days. An investigation will be carry out from 24 hours to 6 days after the meeting with the complainant. The result of the complaint will be inform to the complainant.</p> <p>Meeting was held in quarterly basis and the last meeting was conducted on 9/10/2019 for Mboukou Lot 1, Moutassiu Lot 3 and PK19. Seen the meeting minutes. Function of the committee and the grievance mechanism was discussed during the meeting. Besides, there was an independent consultant carried out a Gender Diagnosis in Plantation on 12 – 18/6/2019. There was no sexual harassment and violence cases reported in Mboukou Lot 1 and PK19.</p>	<p>Complied</p>
<p><b>Criteria 6.6:</b>          No forms of forced or trafficked labour are used.</p>			

6.6.1	<p><b>C)</b> All work is voluntary and following are prohibited:</p> <ul style="list-style-type: none"> <li>• Retention of identity documents or passports</li> <li>• Payment of recruitment fees</li> <li>• Contract substitution</li> <li>• Involuntary overtime</li> <li>• Lack of freedom of workers to resign</li> <li>• Penalty for termination of employment</li> <li>• Debt bondage</li> <li>• Withholding of wages</li> </ul>	<p>Interviewed with the workers confirmed that no forced and trafficked labour in Olam Palm Gabon. For Indonesian workers, they do not pay any recruitment fees in their home country. The terms and conditions offered by the company were similar in their home country and when arrived to the plantations. No contract substitution has occurred. They have voluntarily surrendered their passport to the management for safekeeping with consent letter signed by the Indonesian workers. Overtimes was monitored by the company and the workers are giving freedom to choose to overtime and resign. There was no penalty for termination of employment if they wish to terminate the contract earlier.</p>	Complied
6.6.2	<p><b>(C)</b> Where temporary or migrant workers are employed, a specific labour policy and procedures are established and implemented.</p>	<p>The company has developed the Human Rights Policy where it has clearly stated that the company will provide legal minimum standard concerning wages and benefits. Working condition include the safe housing condition, access to adequate clean, potable water, adequate, sufficient and affordable food will be provided. No discrimination practices in Olam Palm Gabon where it has outlined in "The Olam Code of Conduct" and "Olam Fair Employment Policy". Adequate trainings will be provided to workers such as induction training for new employees related to the safety, employment contracts and cultures. Besides, the company practices direct employment from Indonesia to minimize exposure of foreign workers related fees and costs imposed on them during time if recruitment, in transit and duration of employment in Gabon without being exposed to 'red-tape' and trafficking.</p> <p>All the workers will be provided with a written, understandable and legally binding labour contract. Temporary fixed term workers, Contrat a Dure Detemine (CDD) received the conditions equivalent to the permanent workers too. Each of the workers and briefed them on all the Code of Conduct, safety and working condition prior to work.</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><b>(C)</b> The responsible person(s) for H&amp;S is identified. There are records of regular meetings between the responsible person(s) and workers. Concerns of all parties about health, safety and welfare are discussed at these meetings, and any issues raised are recorded.</p>	<p>Person responsible for safety is safety and health officer for Bilala POM. For OPG Mouila and Ndende Plantation, Health and Safety Committee at Work organization structure lead by Deputy Site Head, with the representative from each lot 1,2,3 and Ndende. Joint meeting carried out between the responsible person (s) and workers were carried out every 3 months. Date of meeting and concern raised as per the following:</p> <table border="1" data-bbox="1093 644 1930 1171"> <thead> <tr> <th>Work units</th> <th>Date of meeting</th> <th>Issues of concern &amp; resolution</th> </tr> </thead> <tbody> <tr> <td>Bilala POM</td> <td>26/3/19</td> <td>Accident investigation and prompt reporting, regular pregnancy test for women sprayer.</td> </tr> <tr> <td>Estate 14</td> <td rowspan="4">29/4/19, 21/6/19, 20/8/19</td> <td>HIRARC review, vehicle and motor inspection, HSE matters</td> </tr> <tr> <td>Estate 15</td> <td>Annual medical check, PPE requirement</td> </tr> <tr> <td>Estate 1</td> <td>Water shortage issue</td> </tr> <tr> <td>Estate 2</td> <td>PPE for truck driver</td> </tr> </tbody> </table>	Work units	Date of meeting	Issues of concern & resolution	Bilala POM	26/3/19	Accident investigation and prompt reporting, regular pregnancy test for women sprayer.	Estate 14	29/4/19, 21/6/19, 20/8/19	HIRARC review, vehicle and motor inspection, HSE matters	Estate 15	Annual medical check, PPE requirement	Estate 1	Water shortage issue	Estate 2	PPE for truck driver	Complied
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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>Fire Safety Management, document ref.:S501, issue:4 dated 1/4/16. Details of standard procedure divided into 5 main sections:</p> <ul style="list-style-type: none"> <li>i) Fire Safety Management Programme</li> <li>ii) Fire Safety Design</li> <li>iii) Fire Prevention Programme</li> <li>iv) Fire Emergency Plan</li> <li>v) Training</li> </ul>	Minor Non-conformance															

		<p>Emergency Response Team (ERT) equipment and team preparedness is monitored based on checklist, Fire Preparedness and Validation Checklist. Rating is given from scale 0 (zero – no system present) to 5 (high standard of compliance). Latest report rated at 68% with a few comments for improvement for both team and equipment preparedness. Joint drill with armed forces from Corps Division of Fire Fighting, Major General of Armed Forces Republic Of Gabon was carried out on 30/1/19. Post mortem report and recommendation is included in the report (annual exercise, improvement of drill process, continuous briefing and training etc).</p> <p>Each estates have Emergency Response Team (ERT) for fire and accident. Sighted the identified PIC for emergency for estate 1 and 2. The latest fire-fighting drill/training was carried out on 6/6/19 for lot 1 fire-fighting team.</p> <p>Fire-fighting and panic and incident risk training was carried out on Rescue training and First aider intervention – (28-29/1/19). For Bilala POM, there are total of 7 trained first aider including mill security personnel.</p> <p>Any incidents will be reported using the initial report; Declaration accident/incident and followed by official report using Safety Event Report and Investigation. For 2019, there were 3 incidents reported for Bilala POM. Accident cases will be periodically review on quarterly basis during Safety and Health Committee at Work meeting.</p> <p>Incident investigation process – review of accident cases and response to accident emergency is referred to doc ref: OPG-MLA-EHS-SOP-16 rev:1 dated 28/9/17.</p> <p>Further trailed on some of the inputs provided during audit; i) Accident investigation and LTA reporting</p>	
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		<p>- No declaration of accident and investigation done for accident involving Indonesian Foreign Worker (IFW) dated 27/6/19 (estate 14)          - Discrepancies of LTA reported for the case dated 14/5/19 (worker ID: 000805) and 29/5/19 (worker ID: 52476). Further verification made with medical doctor at Mboukou Clinic, no medical leave given to both workers contrary with LTA recorded by EHS department.</p> <p>ii) Trained first aider was not available at site, for spraying gang at block Z80 (estate 1). No evidence to show that CDQ has received any first aid training.          Thus, a minor NC was issued.</p>															
<p>6.7.3</p>	<p><b>(C)</b> Workers use appropriate personal protective equipment (PPE), which is provided free of charge to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, land preparation, and harvesting. Sanitation facilities for those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing.</p>	<p>Appropriate PPE provided at free of charge to all workers at the place of work to cover all potentially hazardous operations in the mil and estates. PPE guidelines/matrix established is in lined with the recommendation from manufacturer and from material safety data sheet (MSDS). Example of PPE provided for specific work unit as follows:</p> <table border="1" data-bbox="1093 895 1935 1230"> <thead> <tr> <th>Activity/work unit</th> <th>Recommendation</th> </tr> </thead> <tbody> <tr> <td>FFB grading</td> <td>Safety boots, ear plug (SNR;25 dBA), hard hat, gloves (EN388/420) and vest</td> </tr> <tr> <td>Boiler operation</td> <td></td> </tr> <tr> <td>Nut Plant</td> <td></td> </tr> <tr> <td>Laboratory</td> <td></td> </tr> <tr> <td>Sprayer</td> <td>Wellington/gum boots, air purifying respirator, rubber nitrile glove and apron</td> </tr> <tr> <td>Fertilizer applicator</td> <td>Wellington/gum boots, dust respirator, rubber nitrile glove</td> </tr> </tbody> </table> <p>PPE issuance records is maintained for each individual workers. Item issued/replaced will be recorded in the PPE checklist with the date of replacement. FFB graders PPE issuance records checked and found to be in order. Refer to PPE issuance records for July and November 2019.</p>	Activity/work unit	Recommendation	FFB grading	Safety boots, ear plug (SNR;25 dBA), hard hat, gloves (EN388/420) and vest	Boiler operation		Nut Plant		Laboratory		Sprayer	Wellington/gum boots, air purifying respirator, rubber nitrile glove and apron	Fertilizer applicator	Wellington/gum boots, dust respirator, rubber nitrile glove	<p>Complied</p>
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<p>6.7.4</p>	<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>All Olam’s workers are provide with medical care and covered by accident insurance. Lost time accident cases are referred to an summarized as per below:</p> <table border="1"> <thead> <tr> <th>Workers ID/payroll number</th> <th>Social security/Medical insurance coverage</th> <th>Remarks</th> </tr> </thead> <tbody> <tr> <td>055543</td> <td>CNSS, 004-13323277 CNAMGS, 883228835A</td> <td>Olam paid the salary for 2 days (9-10/8/19)</td> </tr> <tr> <td>000805</td> <td>CNSS, 001-10934726 CNAMGS, 3314991901</td> <td>LTI reported for 5 day, CNSS claim reported with no LTI</td> </tr> <tr> <td>052496</td> <td>CNSS, 004-13213722 CNAMGS, 9827780386</td> <td>LTI reported for 5 day, CNSS claim reported with no LTI</td> </tr> </tbody> </table> <p>Sample of Lot 1 and 3 estates workers:</p> <table border="1"> <thead> <tr> <th>Workers ID/payroll number</th> <th>Social security/Medical insurance coverage</th> </tr> </thead> <tbody> <tr><td>042900</td><td>CNSS, 004-11650877</td></tr> <tr><td>001073</td><td>CNSS, 001-04345814</td></tr> <tr><td>052590</td><td>CNSS, 001-10315967</td></tr> <tr><td>011922</td><td>CNSS, 001-11273363</td></tr> <tr><td>006532</td><td>CNSS, 001-11044202</td></tr> <tr><td>005592</td><td>CNSS, 001-11005252</td></tr> <tr><td>000891</td><td>CNSS, 004-12945388</td></tr> <tr><td>038103</td><td>CNSS, 004-12797366</td></tr> <tr><td>052494</td><td>CNSS, 001-13214188</td></tr> </tbody> </table> <p>JC Services (harvesting contractor)</p> <table border="1"> <thead> <tr> <th>Insurance coverage</th> <th>Remarks</th> </tr> </thead> <tbody> <tr> <td>CNSS, 001-01897888-N</td> <td>Register date: 1/4/19</td> </tr> </tbody> </table>	Workers ID/payroll number	Social security/Medical insurance coverage	Remarks	055543	CNSS, 004-13323277 CNAMGS, 883228835A	Olam paid the salary for 2 days (9-10/8/19)	000805	CNSS, 001-10934726 CNAMGS, 3314991901	LTI reported for 5 day, CNSS claim reported with no LTI	052496	CNSS, 004-13213722 CNAMGS, 9827780386	LTI reported for 5 day, CNSS claim reported with no LTI	Workers ID/payroll number	Social security/Medical insurance coverage	042900	CNSS, 004-11650877	001073	CNSS, 001-04345814	052590	CNSS, 001-10315967	011922	CNSS, 001-11273363	006532	CNSS, 001-11044202	005592	CNSS, 001-11005252	000891	CNSS, 004-12945388	038103	CNSS, 004-12797366	052494	CNSS, 001-13214188	Insurance coverage	Remarks	CNSS, 001-01897888-N	Register date: 1/4/19	<p>Minor non-conformance</p>
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6.7.5	Occupational injuries are recorded using Lost Time Accident (LTA) metrics.	<p>Occupational injuries recorded using Lost Time Accident (LTA) metrics.</p> <table border="1"> <thead> <tr> <th>Year</th> <th>Bilala POM</th> <th>Lot 3 estate</th> <th>Lot 1 estate</th> </tr> </thead> <tbody> <tr> <td>2018</td> <td>0</td> <td colspan="2">2,547 (LTA 863)</td> </tr> <tr> <td>2019 to date</td> <td>3 cases (2 LTA)</td> <td>405 cases (1685 LTA)</td> <td>461 cases (111 LTA)</td> </tr> </tbody> </table> <p>There is no fatal case reported at Mouila Lot 1 &amp; 3 estates.</p>	Year	Bilala POM	Lot 3 estate	Lot 1 estate	2018	0	2,547 (LTA 863)		2019 to date	3 cases (2 LTA)	405 cases (1685 LTA)	461 cases (111 LTA)	Complied
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<p><b>Principle 7:</b> Protect the environment, conserve biodiversity and ensure sustainable management of natural resources.</p>															
<p><b>Criteria 7.1:</b> Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management (IPM) techniques.</p>															
7.1.1	<b>(C)</b> IPM plans are implemented and monitored to ensure effective pest control.	<p>Implementation of IPM is being monitored according the established guidelines under OLAM PALM GABON – Agriculture Policy Manual Volume 1 and Volume 2 dated April 2013 Environmental friendly approach to treat if there is any outbreak using Bacillus Thuringiensis (BT), Cordyceps Militaris for treatment of bagworms and nettle caterpillars is recommended. Threshold level is defined in the Agriculture Policy Manual. Last option of control is through agrochemical use. The component of IPM includes early warning system, immediate control, and census prior and after control as part of evaluation. It was noted that beneficial plant such as Antigonon Leptopus and Turnera Subulata were planted along some of the field roads to host the predators Major</p>	Complied												

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pest and disease at the moment are elephant and Ryncophorus are exist at Mouila lot 1 and 3 Plantation. IPM monitoring summary as per below:

Estate	Length/plot/distance	Remarks
1	231 plots	5 Ha = 2 plots, 1 plot=4 meters
2	469 plots	
14	Total length (14.80 km)	
15	No beneficial plant cultivation yet for 2017 planting.	The most species planted: Antigonon Leptopus and Turnera Subulata

**Pest and disease mitigation plan**

Estate	Major Pest and Disease	Mitigation and progress
14	Elephant intrusion and Rhychophorus	i) Construction of elephant trenches (35.53 km) ii) Barb wire installation (51.96 km) iii) Rhychophorus trap installation (1 trap: 25 ha) iv) Chemical spraying using deltamethrin/cypermethrin v) Uprooting for phyto sanitation  June – October 2019 No. of elephant intrusion: 12 No. of rhychophorus: 29
15	Elephant intrusion	Construction of elephant trenches (8.50 km)
1	Elephant intrusion and Rhychophorus	Construction of elephant trenches (21.39 km)



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2	Elephant intrusion and Rhychophorus	i) Construction of elephant trenches (35.41 km) ii) Barb wire installation (5.34 km) iii) Installation of sensor nodes (10 units)  Total damage: 7314 palms (SPH 145), 50.44 ha affected.				
7.1.2	Species referenced in the Global Invasive Species Database and CABI.org are not to be used in managed areas, unless plans to prevent and monitor their spread are implemented.	Species referenced in the Global Invasive Species Database and CABI.org are not used at Lot 1 and lot 3 estates.	Complied			
7.1.3	There is no use of fire for pest control unless in exceptional circumstances, i.e. where no other effective methods exist, and with prior approval of government authorities. [For NI to define process]	No fire used for pest control.	Complied			
<b>Criteria 7.2:</b>						
Pesticides are used in ways that do not endanger health of workers, families, communities or the environment.						
7.2.1	<b>(C)</b> Justification of all pesticides used is demonstrated. Selective products and application methods that are specific to the target pest, weed or disease are prioritised.	Justification of all pesticides used is available under Olam Palm Gabon, Agriculture Policy Manual Volume 1 and Volume 2 dated April 2013. The use of pesticide is specific to the target pest, weed and disease. Based on Olam Palm Gabon, Chapter 9: Immature Maintenance and Ablation; a systemic type of chemical is recommended for circle spraying activities. As for pest and disease treatment, IPM Practices dated 25/11/2017, entitled OPG Agriculture Circular no.3: Treatment and Management of <i>Rhynchophorus Phoenicis</i> is referred to.	Complied			

		<p>Sample of pesticide used and justification:</p> <table border="1"> <tr> <th>Chemical (active ingredients)</th> <th>Target weeds</th> </tr> <tr> <td>Glyphosate IPA</td> <td>Circle with grass predominating</td> </tr> <tr> <td>Glyphosate IPA + Metsulfuron Methyl</td> <td>Circle with broadleaf weeds and grasses</td> </tr> <tr> <td>Triclopyr-2-butoxyethyl ester + surfactant (sticking agent)</td> <td>Woody growth</td> </tr> <tr> <td>Cypermethrin/Deltamethrin</td> <td><i>Rhychophorus Phoenicis</i></td> </tr> </table>	Chemical (active ingredients)	Target weeds	Glyphosate IPA	Circle with grass predominating	Glyphosate IPA + Metsulfuron Methyl	Circle with broadleaf weeds and grasses	Triclopyr-2-butoxyethyl ester + surfactant (sticking agent)	Woody growth	Cypermethrin/Deltamethrin	<i>Rhychophorus Phoenicis</i>																								
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7.2.2	<p><b>(C)</b> 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>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> <table border="1"> <thead> <tr> <th>Estate</th> <th>Active ingredient</th> <th>Ai per Ha</th> </tr> </thead> <tbody> <tr> <td rowspan="3">14</td> <td>Metsulfuron Methyl</td> <td>0.20</td> </tr> <tr> <td>Triclopyr butotyl</td> <td>0.05</td> </tr> <tr> <td>Glyphosate Isopropyl Ammonium</td> <td>0.28</td> </tr> <tr> <td rowspan="3">15</td> <td>Metsulfuron Methyl</td> <td>0.2</td> </tr> <tr> <td>Triclopyr butotyl</td> <td>0.32</td> </tr> <tr> <td>Glyphosate Isopropyl Ammonium</td> <td>0.30</td> </tr> <tr> <td rowspan="4">1</td> <td>Metsulfuron Methyl</td> <td>0.01</td> </tr> <tr> <td>Triclopyr butotyl</td> <td>0.09</td> </tr> <tr> <td>Glyphosate Isopropyl Ammonium</td> <td>0.65</td> </tr> <tr> <td>Deltamethrin</td> <td>0.01</td> </tr> <tr> <td rowspan="3">2</td> <td>Metsulfuron Methyl</td> <td>0.04</td> </tr> <tr> <td>Triclopyr butotyl</td> <td>0.25</td> </tr> <tr> <td>Glyphosate Isopropyl Ammonium</td> <td>1.85</td> </tr> </tbody> </table>	Estate	Active ingredient	Ai per Ha	14	Metsulfuron Methyl	0.20	Triclopyr butotyl	0.05	Glyphosate Isopropyl Ammonium	0.28	15	Metsulfuron Methyl	0.2	Triclopyr butotyl	0.32	Glyphosate Isopropyl Ammonium	0.30	1	Metsulfuron Methyl	0.01	Triclopyr butotyl	0.09	Glyphosate Isopropyl Ammonium	0.65	Deltamethrin	0.01	2	Metsulfuron Methyl	0.04	Triclopyr butotyl	0.25	Glyphosate Isopropyl Ammonium	1.85	Complied
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	Triclopyr butotyl	0.32																																		
	Glyphosate Isopropyl Ammonium	0.30																																		
1	Metsulfuron Methyl	0.01																																		
	Triclopyr butotyl	0.09																																		
	Glyphosate Isopropyl Ammonium	0.65																																		
	Deltamethrin	0.01																																		
2	Metsulfuron Methyl	0.04																																		
	Triclopyr butotyl	0.25																																		
	Glyphosate Isopropyl Ammonium	1.85																																		
7.2.3	<p><b>(C)</b> Any use of pesticides is minimised as part of a plan, eliminated where possible, in accordance with IPM plans.</p>	<p>As per the Agriculture Policy Manual, used of pesticides are still relevant for the treatment of pest and disease. Whenever possible, IPM approach will be the used to minimise and eliminated the chemical treatment/application.</p>	Complied																																	

7.2.4	There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in national best	No prophylactic use of pesticides used in Mouila Plantation.	Complied						
7.2.5	<p>Pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat, are not used, unless in exceptional circumstances, as validated by a due diligence process, or when authorised by government authorities for pest outbreaks.</p> <p>The due diligence refers to:</p> <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>	<p>No 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 used at Mouila Plantation. Only approved chemical used as per the register for 2019. No class 1A or 1B chemical used in Mouila Plantation</p> <p>No class 1A or 1B chemical used in Mouila Plantation .</p> <p>No class 1A or 1B chemical used in Mouila Plantation.</p> <p>No class 1A or 1B chemical used in Mouila Plantation.</p> <p>No class 1A or 1B chemical used in Mouila Plantation.</p>	Complied						
7.2.6	<p><b>(C)</b> Pesticides are only handled, used or applied by persons who have completed the necessary training and are always applied in accordance with the product label. All precautions attached to the products are properly observed, applied, and understood by workers (see Criterion 3.6). Personnel applying pesticides must show evidence of regular updates on the knowledge about the activity they carry out.</p>	<p>Pesticides are only handled, used and applied by trained personnel and accordance to product label. All precautions attached to the products are properly observed, applied, and understood by workers. This has been confirmed during field visit with workers. Regular updates on the knowledge is given during refresher training programme. For example, there were 2 session for sprayers at estate 2 on 8/2/19 and 4/11/19.</p> <p>Summary of chemical used, Ai and chemical class as per below:</p> <table border="1" data-bbox="1086 1252 1926 1372"> <thead> <tr> <th data-bbox="1086 1252 1344 1332">Chemical Name/trade name</th> <th data-bbox="1344 1252 1713 1332">Active ingredient</th> <th data-bbox="1713 1252 1926 1332">Class</th> </tr> </thead> <tbody> <tr> <td data-bbox="1086 1332 1344 1372">Best Up 480 SL</td> <td data-bbox="1344 1332 1713 1372">Glyphosate IPA</td> <td data-bbox="1713 1332 1926 1372">III</td> </tr> </tbody> </table>	Chemical Name/trade name	Active ingredient	Class	Best Up 480 SL	Glyphosate IPA	III	Complied
Chemical Name/trade name	Active ingredient	Class							
Best Up 480 SL	Glyphosate IPA	III							

		Ally 20 DF	Metsulfuron-methyl	III	
		Garlon	Triclopyr-2-butoxyethyl ester	III	
		HASTEN	Surfactant @ Ethylated vegetable oil	IV	
7.2.7	<b>(C)</b> Storage of all pesticides is in accordance with recognised best practices.	The storage of all pesticides and agrochemicals are well managed with locking system and good ventilation. All pesticide containers are properly disposed and not used for other purposes. Proper waste disposal according to procedures were sighted. Annually training is conducted to raise awareness of proper waste disposal to workers as well as to the estate personnel. Wastes are identified e.g. domestic waste, scheduled waste, recyclable waste and empty chemical containers.			Complied
7.2.8	All pesticide containers are properly disposed of and/or handled responsibly if used for other purposes.	Proper disposal of waste material are carried out as per the company procedures. The procedures are fully understood by workers and managers. Workers interview reveal that they are aware of the zero burning policy including domestic waste are not allowed to be burned. Management of waste material disposal such as empty chemical container as in accordance with scheduled waste and domestic waste regulations and guidelines.			Complied
7.2.9	<b>(C)</b> 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.	No aerial spray at Mouila Lot 1 and 3 estates.			Complied
7.2.10	<b>(C)</b> Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated.	Annual medical surveillance for pesticide operators was carried for each visited estates summarize as per below:  <u>Estate 14</u> Sample of sprayer gang at block V97			Complied

**RSPO Public Summary Report**  
**Revision 9 (Nov 2019)**

Workers ID	Date of examination	Blood acetylcholinesterase
010002	14/11/19	42.5 UI/g Hb
024543	25/7/19	34.2 UI/g Hb
053994	17/6/19	38.1 UI/g Hb
053983	17/6/19	41.9 UI/g Hb
038538	25/7/19	37.2 UI/g Hb
047456	25/7/19	29.7 UI/g Hb
024924	17/6/19	32.5 UI/g Hb

\* Normal range (33-49.4 UI/g Hb)

Estate 15

Sample of sprayer gang at block W111

Workers ID	Date of examination	Blood acetylcholinesterase
046014	18/6/19	35.5 UI/g Hb
051325	18/6/19	45.5 UI/g Hb
048685	18/6/19	44.7 UI/g Hb
047033	18/6/19	37.7 UI/g Hb
014139	18/6/19	32.7 UI/g Hb
052542	18/6/19	35.5 UI/g Hb
051249	18/6/19	34.1 unit/g Hb

\* Normal range (33-49.4 UI/g Hb)

Estate 1

Sample of sprayer gang at block Z80

Workers ID	Date of examination	Blood acetylcholinesterase
010002	14/11/19	42.5 UI/g Hb
024543	25/7/19	34.2 UI/g Hb
053994	17/6/19	38.1 UI/g Hb
053983	17/6/19	41.9 UI/g Hb
038538	25/7/19	37.2 UI/g Hb
047456	25/7/19	29.7 UI/g Hb

		<table border="1"> <tr> <td>024924</td> <td>17/6/19</td> <td>32.5 UI/g Hb</td> </tr> </table> <p>* Normal range (33-49.4 UI/g Hb)</p> <p>Estate 2  Sample of sprayer gang at block K46</p> <table border="1"> <thead> <tr> <th>Workers ID</th> <th>Date of examination</th> <th>Blood acetylcholinesterase</th> </tr> </thead> <tbody> <tr> <td>010002</td> <td>14/11/19</td> <td>42.5 UI/g Hb</td> </tr> <tr> <td>024543</td> <td>25/7/19</td> <td>34.2 UI/g Hb</td> </tr> <tr> <td>053994</td> <td>17/6/19</td> <td>38.1 UI/g Hb</td> </tr> <tr> <td>053983</td> <td>17/6/19</td> <td>41.9 UI/g Hb</td> </tr> <tr> <td>038538</td> <td>25/7/19</td> <td>37.2 UI/g Hb</td> </tr> <tr> <td>047456</td> <td>25/7/19</td> <td>29.7 UI/g Hb</td> </tr> <tr> <td>024924</td> <td>17/6/19</td> <td>32.5 UI/g Hb</td> </tr> </tbody> </table> <p>* Normal range (33-49.4 UI/g Hb)</p>	024924	17/6/19	32.5 UI/g Hb	Workers ID	Date of examination	Blood acetylcholinesterase	010002	14/11/19	42.5 UI/g Hb	024543	25/7/19	34.2 UI/g Hb	053994	17/6/19	38.1 UI/g Hb	053983	17/6/19	41.9 UI/g Hb	038538	25/7/19	37.2 UI/g Hb	047456	25/7/19	29.7 UI/g Hb	024924	17/6/19	32.5 UI/g Hb	
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7.2.11	<b>(C)</b> No work with pesticides is undertaken by persons under the age of 18, pregnant or breastfeeding women or other people that have medical restrictions and they are offered alternative equivalent work.	No pregnant or breast feeding women undertaking the work with pesticide. It was confirmed during interview the female workers and they well aware related regulation. During interview with female workers confirmed knowledge of the policy of transfer to alternative duties if they wished to continue working when pregnancy was confirmed or breast-feeding.	Complied																											
<b>Criteria 7.3:</b>																														
Waste is reduced, recycled, reused and disposed of in an environmentally and socially responsible manner.																														
7.3.1	A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented.	The waste management plan is established following the Standard Operating Procedure for Waste Management (Doc No: OPG-MLA-EHS-SOP-12) dated 12/09/2017. The waste are categorized to biodegradable, non-biodegradable and hazardous. The waste management plan for Lot 1 dated 01/02/2016 was sighted. The type of wastes that are generated by each operating sites are identified. The method of disposal (including if it should be recycle and reused) is documented in the management plan.	Minor non-conformance																											

		<p>The collected waste are being segregated at the waste collection site for degradable and non-degradable.</p> <p>During field assessment at the waste collection centres / landfills, it was observed that hazardous waste has been stored and not able to be disposed yet as per the management plan. Despite of actions have been started, the management plan shall be revised with specific time commitment as this has already be an issue.</p> <p>It was further observed that in Lot 1 workshop, the secondary containment of the waste oil have not installed valve to contained any spillage of the oil. The current installation is direct discharge to the oil trap which is not be sufficient to contain the volume of the waste oil tank. Thus, a minor non-conformance was issued.</p>	
7.3.2	Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.	<p>The disposal of type of waste are as per the waste management plan dated 01/02/2016. At the Estate 6 disposal site, it was observed that the segregation of wastes are accordance to waste plan. Discussion with the waste disposal site workers confirmed that they understand about the waste segregation.</p> <p>Disposal of waste is still not yet fully understood by workers and managers:</p> <ol style="list-style-type: none"> <li>1. Implementation of waste segregation and awareness of domestic waste disposal/collection at housing camps are still lacking.</li> <li>2. Estate 15 (near to plot V110), it was found to have an abandon waste site.</li> <li>3. Found reuse of chemical container as seat at Mboukou housing area.</li> </ol> <p>Thus, a minor non-conformance was issued.</p>	Minor non-conformance
7.3.3	The unit of certification does not use open fire for waste disposal.	<p>Observation from the waste disposal sites could not observe any waste are disposed using open fire. Biodegradable waste are being landfilled while other non-biodegradable and hazardous waste currently being stored until the waste could be disposed through licensed disposer.</p>	Complied

<b>Criteria 7.4:</b>																							
Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.																							
7.4.1	Good agriculture practices, as contained in SOPs, are followed to manage soil fertility to optimise yield and minimise environmental impacts.	<p>OPG Agriculture Circular: Management of musanga cecropioides (parasolier) , 20/2/18 (chapter 9 : Immature Maintenance and ablation)                      Weed management (manual slashing) and chemical application.                      Dosage                      Mature: 750-1000ml (chemical used) per 100 liter                      Immature: 375 ml (chemical used) per 100 liter                      Class III chemical (Dalopir 480 – tryclpyr butotyl)</p> <p>OPG Circular 3: Treatment &amp; management of Rhynchophorus Phenicis                      Chapter 15: Integrated Pest &amp; Diseases Management Practices                      Dated 25/11/17                      Treatment – Cypermethrin (50 ml mixed 5 liter of water), class III</p>	Complied																				
7.4.2	Periodic tissue and soil sampling is carried out to monitor and manage changes in soil fertility and plant health.	<p>Chapter 19 of OPG’s Agriculture Policy Manual (volume 2), Leaf and Soil Sampling Procedure April 2013 is referred to. Methodology and frequency of analysis is written in the SOP. Internal Agronomist from Agronomy and Research Department visited the estates to carry out foliar sampling prior to the fertilizer recommendation for 2020. Leaf and soil nutrient analysis are commonly used in the diagnosis of nutrient deficiencies in oil palms. Summary of foliar analysis results for lot 1 estates as per the following table:</p> <table border="1" data-bbox="1093 1098 1935 1235"> <thead> <tr> <th>Estate/block</th> <th>Lab code/reference</th> <th>Date of sampling</th> <th>Block number</th> </tr> </thead> <tbody> <tr> <td>Estate 1</td> <td>P-2019-8-1</td> <td>28/2/19</td> <td>AA72</td> </tr> <tr> <td>Estate 2</td> <td>P-2019-9-9</td> <td>28/2/19</td> <td>L48</td> </tr> </tbody> </table> <p>Official analysis report issued on 4/7/19, ref:P-2019-8/9/10/11/12/13</p> <p>Lot 3 estate</p> <table border="1" data-bbox="1093 1331 1935 1390"> <thead> <tr> <th>Estate/block</th> <th>Lab code/reference</th> <th>Date of sampling</th> <th>Block number</th> </tr> </thead> <tbody> <tr> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table>	Estate/block	Lab code/reference	Date of sampling	Block number	Estate 1	P-2019-8-1	28/2/19	AA72	Estate 2	P-2019-9-9	28/2/19	L48	Estate/block	Lab code/reference	Date of sampling	Block number					Complied
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		<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 25%;">Estate 14</td> <td style="width: 25%;">P-2019-21-31</td> <td style="width: 25%;">6/3/19 – 5/4/19</td> <td style="width: 25%;">W94,W95 &amp; W96</td> </tr> <tr> <td>Estate 15</td> <td colspan="3">Not yet tested. Under immature period.</td> </tr> </table> <p>Official analysis report issued on 15/5/19, ref:P-2019-17/18/19/20/21</p> <p><u>Lot 1 plantation</u> Soil assessment was done in September 2014 by Param Agriculture Soil Surveys (M) Sdn Bhd. Semi-detailed soil map of the plantation at scale of 1:25,000 has been produced as a result of the soil sampling and survey. Summary of the soil types is reported under Appendix II, Semi Detailed Soil Map Legend. Based on the report, there was no fragile, problematic or peat soil within Mouila Plantation.</p> <p><u>Lot 3 plantation</u> Soil assessment was done in October 2018 by Param Agriculture Soil Surveys (M) Sdn Bhd. Semi-detailed soil map of the plantation at scale of 1:25,000 has been produced as a result of the soil sampling and survey. Parent materials classified as sub-recent alluvium, reworked petrolineithite pediments and sedimentary rocks (sandstone/shale). Based on the report, there was no fragile, problematic or peat soil within Mouila Plantation lot 3.</p>	Estate 14	P-2019-21-31	6/3/19 – 5/4/19	W94,W95 & W96	Estate 15	Not yet tested. Under immature period.			
Estate 14	P-2019-21-31	6/3/19 – 5/4/19	W94,W95 & W96								
Estate 15	Not yet tested. Under immature period.										
7.4.3	A nutrient recycling strategy is in place, which includes the recycling of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), palm residues and optimal use of inorganic fertilisers.	<p>Based on Olam Palm Gabon-Agriculture Policy Manual Volume 1 dated April 2013, Chapter 7: Fertilizing Programme for Nursery, Immature and Mature Plantings, the nutrient strategy includes the use of Empty Fruit Bunches (EFB) distributed in the field to improve the soil structure and to conserve soil moisture. Recommendation is 35 mt/ha/yr (mature) and 25 mt/ha/yr for newly planted immature. Sample of the EFB application verified:</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th>Estate</th> <th>Tonnage applied</th> <th>Hectare covered</th> <th>Application rate</th> </tr> </thead> <tbody> <tr> <td>14</td> <td>253.4 mt</td> <td>9.05 ha</td> <td>28 mt/ha</td> </tr> </tbody> </table>	Estate	Tonnage applied	Hectare covered	Application rate	14	253.4 mt	9.05 ha	28 mt/ha	Complied
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7.4.4	Records of fertiliser inputs are maintained.	<p>Fertilizers are applied as per agronomist recommendation. Record shows application date, filed number, dosage applied per palm, type of fertilizer and number of applicators. The 2019 Fertiliser Recommendation For Oil Palm Plantings in Mouila Plantations was made available for review. Sample of recommendation verified:</p> <table border="1"> <thead> <tr> <th>Month</th> <th>Fertilizer type</th> <th>Dosage</th> <th>Remarks</th> </tr> </thead> <tbody> <tr> <td>November 2019</td> <td>SOA</td> <td>0.75 kg per palm To date November 2019 Actual: 120.58 mt vs budget (154.59 mt)</td> <td>Immature recommendation for SPH:160 (high dense) *Estate 15</td> </tr> <tr> <td>September 2019</td> <td>NPK 11/7/35/3+B</td> <td>1.5 kg per palm completed: 459.27 mt</td> <td>Mature manuring schedule (updated September 2019) *Estate 14</td> </tr> <tr> <td>September/October 2019</td> <td>NPK 11/7/35/3+B</td> <td>1.75 kg – 2 kg per palm Actual: 470 mt vs budget (749 mt)</td> <td>Mature manuring schedule (updated October 2019) *Estate 1</td> </tr> </tbody> </table>	Month	Fertilizer type	Dosage	Remarks	November 2019	SOA	0.75 kg per palm To date November 2019 Actual: 120.58 mt vs budget (154.59 mt)	Immature recommendation for SPH:160 (high dense) *Estate 15	September 2019	NPK 11/7/35/3+B	1.5 kg per palm completed: 459.27 mt	Mature manuring schedule (updated September 2019) *Estate 14	September/October 2019	NPK 11/7/35/3+B	1.75 kg – 2 kg per palm Actual: 470 mt vs budget (749 mt)	Mature manuring schedule (updated October 2019) *Estate 1	Complied
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			Balance: 279 mt		
		September/ October 2019	NPK 11/7/35/ 3+B	1.75 kg – 2 kg per palm Actual: 374 mt vs budget (642 mt) Balance: 268 mt	Mature manuring schedule (updated October 2019) *Estate 2
<b>Criteria 7.5:</b> Practices minimise and control erosion and degradation of soils.					
7.5.1	<b>(C)</b> Maps identifying marginal and fragile soils, including steep terrain, are available.	<p>Most of the area at Mouila Lot 1 are generally flat area. No hilly or steep area at all visited estates. The slope classes at Mouila Lot 1 was identified in the Soils of Mouila Lot 1 Plantation report by Param Agricultural Soil Surveys (M) Sdn Bhd. The slope classes are:            0-2° = (Level) 1,215.5ha (6.5%)            2-6° = (Undulating) 15,136.0ha (80.5%)            6-12° = (Rolling) 2,287.2ha (12.1%)            Nursery = 171.3ha (0.9%)</p> <p>Lot 3 slope classes are:            0-2° = (Level) 551.1 ha (2.1%)            2-6° = (Undulating) 23,888.5 ha (92.6%)            6-12° = (Rolling) 1,263.4 ha (5.3%)</p> <p>No hilly and steep area within Mouila Lot 1 and 3 plantation.</p>			Complied
7.5.2	There is no extensive replanting of oil palm on steep terrain.	No steep terrain at Mouila Lot 1 and 3 plantation. Thus, this indicator is not available.			Not applicable
7.5.3	There is no new planting of oil palm on steep terrain.	No steep terrain at Mouila Lot 1 and 3 plantation. Thus, this indicator is not available			Not applicable

<b>Criteria 7.6:</b> Soil surveys and topographic information are used for site planning in the establishment of new plantings, and the results are incorporated into plans and operations.															
7.6.1	<b>(C)</b> To demonstrate the long-term suitability of land for palm oil cultivation, soil maps or soil surveys identifying marginal and fragile soils, including steep terrain, are taken into account in plans and operations.	Soil assessment was done in September 2014 by Param Agriculture Soil Surveys (M) Sdn Bhd. Semi-detailed soil map of the plantation at scale of 1:25,000 has been produced as a result of the soil sampling and survey. Summary of the soil types is reported under Appendix II, Semi Detailed Soil Map Legend. Majority of soil type summarized as per below:	Complied												
		<table border="1"> <thead> <tr> <th>No.</th> <th>Soil type</th> <th>Remarks</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Gajah Mati</td> <td rowspan="4">All soil type categorized as mineral soil.</td> </tr> <tr> <td>2</td> <td>Pedu</td> </tr> <tr> <td>3</td> <td>Tebok</td> </tr> <tr> <td>4</td> <td>Terap</td> </tr> </tbody> </table>	No.	Soil type	Remarks	1	Gajah Mati	All soil type categorized as mineral soil.	2	Pedu	3	Tebok	4	Terap	
No.	Soil type	Remarks													
1	Gajah Mati	All soil type categorized as mineral soil.													
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4	Terap														
		<p><u>Lot 3 estate</u></p> <p>Soil map is incorporated in Preliminary Soil Assessment of Mouila Lot 3 Estate, Ngounie, Republic of Gabon, Africa dated September 2014. A reconnaissance soil map of Mouila Lot 3 estate at a scale of 1:50,000 has been produced. The parent materials found in the Mouila Lot 3 estates consist mainly of sedimentary rocks, pediments (sol remanie) and subrecent alluvium. No problematic and fragile soil within lot 3 estates.</p>													
7.6.2	Extensive planting on marginal and fragile soils, is avoided, or, if necessary, done in accordance with the soil management plan for best practices.	The management strategy has been described in the Agricultural Manual, chapter 6: Soil and Water Conservation Methods. Below are the management strategies for planting:	Complied												

		<p>i) Excessive steep terrain (slope more than 20o) – No construction of terrace</p> <p>ii) Very steep terrain – slope in excess of 20°, planting is not recommended. Planted with LCC or remained untouched.</p> <p>Most of the area at Mouila Lot 1 are generally flat area. No hilly or steep area at all visited estates. The slope classes at Mouila Lot 1 was identified in the Soils of Mouila Lot 1 Plantation report by Param Agricultural Soil Surveys (M) Sdn Bhd. The slope classes are:</p> <p>0-2° = (Level) 1,215.5ha (6.5%)          2-6° = (Undulating) 15,136.0ha (80.5%)          6-12° = (Rolling) 2,287.2ha (12.1%)          Nursery = 171.3ha (0.9%)</p> <p>For lot 3 estates, the majority soil category is under undulating (2-6o): 98.7% - 23,326.7 ha and the rest is rolling (6-12o): 1.3% - 320.3 ha. Reference is made to Preliminary Soil Assessment of Mouila Lot 3 Estate, Ngounie, Republic of Gabon, Africa dated September 2014.</p>	
7.6.3	Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure.	<p>Most of the area at Mouila Lot 1 are generally flat area. No hilly or steep area at all visited estates. The slope classes at Mouila Lot 1 was identified in the Soils of Mouila Lot 1 Plantation report by Param Agricultural Soil Surveys (M) Sdn Bhd. The slope classes are:</p> <p>0-2° = (Level) 1,215.5ha (6.5%)          2-6° = (Undulating) 15,136.0ha (80.5%)          6-12° = (Rolling) 2,287.2ha (12.1%)          Nursery = 171.3ha (0.9%)</p> <p>For lot 3 estates, the majority soil category is under undulating (2-6o): 98.7% - 23,326.7 ha and the rest is rolling (6-12o): 1.3% - 320.3 ha.</p>	Complied

		Reference is made to Preliminary Soil Assessment of Mouila Lot 3 Estate, Ngounie, Republic of Gabon, Africa dated September 2014.	
<b>Criteria 7.7</b>			
No new planting on peat, regardless of depth after 15 November 2018 and all peatlands are managed responsibly.			
7.7.1	<b>(C)</b> There is no new planting on peat regardless of depth after 15 November 2018 in existing and new development areas.	Based on soil study carried out by Param Agriculture Soil Surveys (M) Sdn Bhd entitled Soil of Mouila Lot 1 & 3 Plantation, Ngounie Province, Republic of Gabon Africa dated September 2014, all soil classes are under mineral soil. No peat soil identified within Mouila Lot 1 and 3 plantation.	Complied
7.7.2	Areas of peat within the managed areas are inventoried, documented and reported (effective from 15 November 2018) to RSPO Secretariat.	No peat soil identified within Mouila Lot 1 and 3 plantation	Not applicable
<b>PROCEDURAL NOTE:</b> Maps and other documentation of peat soils are provided, prepared and shared in line with RSPO Peatland Working Group (PLWG) audit guidance (see Procedural Note for 7.7.5 below).			
7.7.3	<b>(C)</b> Subsidence of peat is monitored, documented and minimised.	No peat soil identified within Mouila Lot 1 and 3 plantation	Not applicable
7.7.4	<b>(C)</b> A documented water and ground cover management programme is in place.	No peat soil identified within Mouila Lot 1 and 3 plantation	Not applicable
7.7.5	<b>(C)</b> For plantations planted on peat, drainability assessments are conducted following the RSPO Drainability Assessment Procedure, or other RSPO recognised methods, at least five years prior to replanting. The assessment result is used to set the timeframe for future replanting, as well as for phasing out of oil palm cultivation at least 40 years, or two cycles, whichever is greater, before reaching the natural gravity drainability limit for peat. When oil palm is phased out, it is replaced with crops suitable for a higher water table (paludiculture) or rehabilitated with natural vegetation.	No peat soil identified within Mouila Lot 1 and 3 plantation	Not applicable

7.7.6	<b>(C)</b> All existing plantings on peat are managed according to the RSPO Manual on Best Management Practices (BMPs) for existing oil palm cultivation on peat', version 2 (2018) and associated audit guidance.	No peat soil identified within Mouila Lot 1 and 3 plantation	Not applicable
7.7.7	<b>(C)</b> All areas of unplanted and set-aside peatlands in the managed area (regardless of depth) are protected as "peatland conservation areas"; 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.	No peat soil identified within Mouila Lot 1 and 3 plantation	Not applicable
<b>Criteria 7.8</b> Practices maintain the quality and availability of surface and groundwater.			
7.8.1	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: 7.8.1a The unit of certification does not restrict access to clean water or contribute to pollution of water used by communities.	Water Management Plan for Lot 3 dated November 2018 is available. Sample of water management monitoring verified: Water consumptions records – Quality of drinking water is monitored on quarterly basis by Lebamba Analytical Services Laboratory. Sampled the test report dated 8/8/19 is referred to. Overall test result indicates the treated water is according to WHO standards for household use with water boiling is recommended before drinking. Quality of surface water – e.g. Dola River, Iroungou River, Dibotsa River, Douya River, Koutsou River, Ikola River sampling analysis was conducted together with Ministry of Petrol and Hydrocarbon.  Water Management Plan for Mouila Lot 1 was last reviewed on November 2018. The plan was implemented and monitored on monthly basis by the HSE team & Corporate Responsibility & Sustainability team. The objectives and methods of water management is provided in the Management Plan. Sample of water management monitoring verified:	Complied

		<p>Water consumptions records – Quality of drinking water is monitored on quarterly basis by Lebamba Analytical Services laboratory. The test report dated 8/8/19 verified that the overall test result indicates the treated water is according to the WHO standard for household use with water boiling is recommended before drinking. Quality of surface water:– e.g. Doubou River &amp; Rembo River sampling analysis was conducted together with Ministry of Petrol and Hydrocarbon.</p> <p>The frequency is 6 months once. Latest sampling was done on 11/10/2019 where the parameters tested were pH, T, turbidity, Phosphates, Cl, COD, BOD, total hydrocarbon (O&amp;G). Results indicates results within allowable tolerable range limit.</p>									
	<p>7.8.1b Workers have adequate access to clean water.</p>	<p>Workers have adequate access to clean water which provided by company owned water treatment system. Water consumptions records – Quality of drinking water is monitored on quarterly basis by Lebamba Analytical Services laboratory. The test report dated 8/8/2019 verified that the overall test result indicates the treated water is according to the standards for household use with water boiling is recommended before drinking.</p>									
<p>7.8.2</p>	<p><b>(C)</b> Water courses and wetlands are protected, including maintaining and restoring appropriate riparian and other buffer zones in line with 'RSPO Manual on BMPs for the management and rehabilitation of riparian reserves' (April 2017).</p>	<p>Protection of water courses and wetlands, including maintaining and restoring appropriate riparian and other buffer zones is based on the guidelines under Gabon National Interpretation (NI) and Olam's International Limited internal policy of buffer zone dimension at lot 1 and 3 estates.</p> <table border="1" data-bbox="1093 1182 1935 1378"> <tr> <td>Width of major watercourses</td> <td>Minimum riparian buffer zone width (m) on each side of water courses</td> </tr> <tr> <td>&lt;20 m (small river)</td> <td>30 meters</td> </tr> <tr> <td>&gt;20 meters (main river)</td> <td>300 - 500 meters</td> </tr> <tr> <td>Lake, ponds &gt;1,000 m2</td> <td>30 meters</td> </tr> </table>	Width of major watercourses	Minimum riparian buffer zone width (m) on each side of water courses	<20 m (small river)	30 meters	>20 meters (main river)	300 - 500 meters	Lake, ponds >1,000 m2	30 meters	<p>Complied</p>
Width of major watercourses	Minimum riparian buffer zone width (m) on each side of water courses										
<20 m (small river)	30 meters										
>20 meters (main river)	300 - 500 meters										
Lake, ponds >1,000 m2	30 meters										



		Clear marking and demarcation of buffer zone was observed at all visited site. Some buffer zone is located adjacent to HCV and conservation area. Most of the river width is less < 20 m within the estates and minimum riparian buffer zone size is maintained and conserved.	
7.8.3	Mill effluent is treated to be in compliance with national regulations. Discharge quality of mill effluent, especially Biochemical Oxygen Demand (BOD), is regularly monitored.	Prescribed under discharge limit for land application, the limit is 5000 mg/l. Based on analysis dated 24/9/19, treated effluent result recorded at 8,000 mg/l vs 5,000 mg/l for land irrigation. Thus, a minor non-conformance was issued.	Minor non-conformance
7.8.4	Mill water use per tonne of FFB is monitored and recorded.	The water usage by the mill is monitored on daily basis using flowmeter . As of October 2018, the water consumption is 0.77 mt water/mt FFB [ref.: Monthly Water to FFB record] vs. 1.2 mt/mt FFB [ref.: annual budget].	Complied
<b>Criteria 7.9:</b> Efficiency of fossil fuel use and the use of renewable energy is optimised			
7.9.1	A plan for improving efficiency of the use of fossil fuels and to optimize renewable energy is in place, monitored and reported	<p>The fossil fuel consumed at the mill (diesel) and Lot 1 (diesel and petrol) are monitored on a monthly basis. The fossil fuel consumption has significantly reduced comparing to 2018.</p> <ol style="list-style-type: none"> <li>1. Year to date, the mill consumed 3 litre of diesel to produce 1 ton of CPO while in year 2018, it consumed 4.7 litre of diesel to produce 1 ton of CPO.</li> <li>2. Year to date, the Lot 1 consumed 23.1 litre of diesel to produce 1 ton of FFB while in year 2018, it consumed 39.8 litre of diesel to produce 1 ton of FFB.</li> <li>3. Year to date, the Lot 1 consumed 0.1 litre of petrol to produce 1 ton of FFB while in year 2018, it consumed 0.3 litre of petrol to produce 1 ton of FFB.</li> </ol> <p>The efficiency of fossil fuel consumption has been optimised based on increasing of production. The diesel consumption can be reduced at mill</p>	Complied

		<p>when the production increase due to electricity generation is depended on fibre/shell more.</p> <p>The biogas installation plan was sighted and planned to be installed by 2021. As the mill production is still not optimised (due to FFB production), the POME produced is not optimised to operate a biogas plan.</p>	
<p><b>Criteria 7.10:</b> Plans to reduce pollution and emissions, including greenhouse gases (GHG), are developed, implemented and monitored and new developments are designed to minimise GHG emissions.</p>			
7.10.1	<p><b>(C)</b> 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>The GHG emissions for 2018 has been verified. Source of the emissions are mainly due to fossil fuel consumption, POME treatment and utilization of fertilizer. The fuel and fertilization consumption was documented in SAP and was cross reference to the estate records.</p>	Complied
7.10.2	<p><b>(C)</b> Starting 2014, the carbon stock of the proposed development area and major potential sources of emissions that may result directly from the development are estimated and a plan to minimize them prepared and implemented (following the RSPO GHG Assessment Procedure for New Development).</p>	<p>The development of Mouila concession started with New Planting notification. There were 3 NPP notification for Mouila concession. For Lot 3 and Lot 3 extension, the planting decision has taken the scenario of lowest GHG emission. While Lot 1 it is not applicable as the NPP was prior 2014.</p>	Complied
7.10.3	<p><b>(C)</b> Other significant pollutants are identified and plans to reduce or minimize them implemented and monitored.</p>	<p>The OPG Continuous Improvement Plan April 2019 has documented the potential pollutants inclusive of GHG emissions especially from fossil fuel consumption, treatment of POME and fertilizer usage.</p> <p>Plans has been established with realistic timeline to reduce GHG emissions. Sample:</p> <ol style="list-style-type: none"> <li>1. Methane capturing to prevent methane emission was planned. The tendering of the methane capturing plant was sighted. However the plant is not feasible at this point due to insufficient POME generation.</li> <li>2. Carbon neutrality by maintaining large forest cover. The planted area for Lot 1 and Lot 3 has maintained to be 46.33% of the total concession.</li> </ol>	Complied

<b>Criteria 7.11:</b>			
Fire is not used for preparing land and is prevented in the managed area.			
7.11.1	<b>(C)</b> Land for new planting or replanting is not prepared by burning.	OPG has established in the Olam Living Landscape Policy April 2018 to commit to no use of fire in land preparation. The SOP for Land Clearing dated July 2013 stated that land preparation is by felling. There was no signs of burn or reports of OPG using fire for land preparation. This was confirmed during the interview with Mouila Department of Water and Forest.	Complied
7.11.2	The unit of certification establishes fire prevention and control measures for the areas directly managed by the unit of certification.	OPG has established Plantation Fire Management Plan dated 05/05/2017. Some of the prevention and control measurements includes patrol team; continuous awareness and fire prevention belt (establishing road between savannah and estates). The Estate 14 and 15 patrol team consist of 3 people (ID 059715, 059717 and 059719). OPG is also recording fire outbreak and investigate each reported cases. Up to 30/09/2019, there were 26 cases reported mainly during dry season (June to September) where villagers are performing their seasonal activities.	Complied
7.11.3	The unit of certification engages with adjacent stakeholders on fire prevention and control measures.	The Plantation Fire Management Plan dated 05/05/2017 has established strategies to increase awareness of the villagers about the danger of open-burnings. Awareness was conducted for Lot 3 villagers between 26-29 August 2019 at Koumbau Maramba village, Okoumbou Makanda Village, Ikolo village, Moutassou village, Mouladou Fouala village, Mbadi Village, Sanga village, Iroungou village, Nanga Village and Bavanga village.	Complied
<b>Criteria 7.12:</b>			
Land clearing does not cause deforestation or damage any area required to protect or enhance High Conservation Values (HCVs) or High Carbon Stock (HCS) forest. HCVs and HCS forests in the managed area are identified and protected or enhanced.			

<p>7.12.1</p>	<p><b>(C)</b> Land clearing since November 2005 has not damaged primary forest or any area required to protect or enhance HCVs. Land clearing since 15 November 2018 has not damaged HCVs or HCS forests.</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>All planting for OPG Mouila has undergone New Planting notification in the RSPO website. There is no new development after 15 November 2018.</p> <p>Summary of LUCA was published in the RSPO website.</p>	<p>Complied</p>
<p>7.12.2</p>	<p><b>(C)</b> HCVs, HCS forests and other conservation areas are identified as follows:</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>There is no new developed for OPG Mouila after 15 November 2018. All planting for OPG Mouila has undergone New Planting notification in the RSPO website. Since there is no new planting development after 15 November 2018 in the management unit, HCS is not applicable for OPG Mouila. The NPP notifications are as below:</p> <p>Lot 1 NPP - <a href="https://www.rspo.org/certification/new-planting-procedure/public-consultations/olam-international-ltd-olam-palm-gabon-new-planting-assessment-call-for-comments-1">https://www.rspo.org/certification/new-planting-procedure/public-consultations/olam-international-ltd-olam-palm-gabon-new-planting-assessment-call-for-comments-1</a></p> <p>Lot 3 NPP - <a href="https://www.rspo.org/certification/new-planting-procedure/public-consultations/olam-international-limited-olam-palm-gabon-mouila-lot-3">https://www.rspo.org/certification/new-planting-procedure/public-consultations/olam-international-limited-olam-palm-gabon-mouila-lot-3</a></p> <p>Lot 3 Extension NPP - <a href="https://www.rspo.org/certification/new-planting-procedure/public-consultations/olam-international-limited-olam-palm-gabon-mouila-lot-3-extension">https://www.rspo.org/certification/new-planting-procedure/public-consultations/olam-international-limited-olam-palm-gabon-mouila-lot-3-extension</a></p> <p>For Lot 1 HCV assessment, it was completed by Proforest and the assessor was Christopher Stewart. This HCV was prior HCVRN ALS requirements.</p> <p>For Lot 3 and Lot 3 Extension, it was completed by Proforest and the HCVRN ALS was David Hoyle (ALS15008DH).</p>	<p>Complied</p>

	<p>7.12.2b: 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>There is no new developed for OPG Mouila after 15 November 2018. All planting for OPG Mouila has undergone New Planting notification in the RSPO website.</p>	
<p><b>PROCEDURAL NOTE for 7.12.2:</b>          For details of transitional measures, refer to Annex 5: RSPO transition from HCV assessments to HCV-HCSA assessments.</p>			
<p>7.12.3</p>	<p><b>(C)</b> 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>There is no new development in OPG Mouila. All development had under gone New Planting notification in the RSPO website.          OPG has committed no development without HCSA.</p>	<p>Complied</p>
<p><b>PROCEDURAL NOTE for 7.12.3:</b>          There should be demonstrable benefits to the local community; clear recognition of legal and customary lands based on participatory land use planning; development should be proportional to the needs of the local community; with a balance between conservation and development. This procedure will also cover planting on previous or abandoned agricultural land / plantations. All other P&amp;C requirements apply, including FPIC and HCV requirements.</p>			
<p>7.12.4</p>	<p><b>(C)</b> Where HCVs, HCS forests after 15 November 2018, peatland and other conservation areas have been identified, they are protected and/or enhanced. An integrated management plan to protect and/or enhance HCVs, HCS forests, peatland and other conservation areas is developed, 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>The HCV management plan for Lot and Lot 3 are incorporated to the environment and social management plan. The plan was developed following the recommendation from the HCV assessment conducted on 2014 for the purpose of NPP.          The management plan was according to the recommendation of the HCV assessment which was conducted with participatory of local communities. The HCV assessment was conducted by Proforest.          The management plan was developed in June 2015.          As per the water management plan approved on 27/04/2019, it was stated that water sampling at upstream, in-site and downstream is regularly conducted. However, there was only 1 water sampling</p>	<p>Major non-conformance</p>

		<p>conducted in 2018 on 13/06/2018. This is not accordance to the HCV recommendation plan.</p> <p>Another sample was taken from the HCV recommendation plan that to set restoration goal (natural regrowth) for riparian zone with 5 years milestones which are not within the Environment and Social Management Plan dated June 2015.</p>	
7.12.5	<p>Where rights of local communities have been identified in HCV areas, HCS forest after 15 November 2018, peatland and other conservation areas, there is no reduction of these rights without evidence of a negotiated agreement, obtained through FPIC, encouraging their involvement in the maintenance and management of these conservation areas.</p>	<p>The local community can still continue their daily activities (HCV 5). The identification of the area for community activities is documented in the HCV assessment reported dated 18/03/2015. The identification has been reported to be participatory and confirmed during stakeholders' interview.</p> <p>In order to control encroachment from outside of the villages, OPG has introduced access card to the local villages to continue their daily activity. Sample of the access card from Okoumbou and Koumbanou was verified.</p>	Complied
7.12.6	<p>All rare, threatened or endangered (RTE) species are protected, whether or not they are identified in an HCV assessment. 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>During induction of an employment, workers are being inducted with the internal regulation. The internal regulation include immediate dismissal when it was found for hunting and/or trapping and killing of protected species in OPG's operation area.</p> <p>3 samples of employment in Lot 3 was verified for the workers undergone the induction on Code of Conduct and Rules of Procedures dated 28/01/2013.</p> <p>Interview with workers at Lot 3 (spraying and fertilizer) confirmed that the workers are aware about no harming of animals.</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>The monitoring of RTE example elephant has been actively monitored by OPG. Method of monitoring including elephant sensor note installed in Estate 5 of Lot 1 and cameras are stalled to continuously monitors.</p> <p>Additional surveillance camera was approved by the management to be installed to enhance monitoring of the wildlife.</p>	Complied

7.12.8	<b>(C)</b> Where there has been land clearing without prior HCV assessment since November 2005, or without prior HCV-HCSA assessment since 15 November 2018, the Remediation and Compensation Procedure (RaCP) applies.	There is no land clearing was observed in this assessment. All new planting has undergone new planting notification.	Complied
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**Appendix B: Approved Time Bound Plan**



**RSPO Certification Time Bound Plan (revised May 2019<sup>1</sup>)**

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

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

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

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





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

*Handwritten signature and date: 24 June 2019*

**Appendix C: GHG Reporting Executive Summary**

The GHG emissions that were produced in **2018** for **Bilala 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 **2018** for **Bilala POM** and supply base are as following:

Emission per product	tCO <sub>2</sub> e/tProduct
CPO	-20.27
PK	-20.27

Extraction	%
OER	22.29
KER	4.08

Production	t/yr
FFB Process	88,764.6
CPO Produced	19,788.66
PK Produced	3,624.05

Land Use	Ha
OP Planted Area	43,217.85
OP Planted on peat	0
Conservation (forested)	50,147.81
Conservation (non-forested)	0
<b>Total</b>	<b>93,365.66</b>

**Summary of Field Emission and Sink**

	Own Crop*		Group		3 <sup>rd</sup> Party		Total	
	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB
<b>Emission</b>								
Land Conversion	106,733.41	1.4	193,583.73	15.43	0	0	300,317.14	16.83
CO <sub>2</sub> Emission from fertilizer	11,952.65	0.16	14,798.43	1.18	0	0	26,751.08	1.34
NO <sub>2</sub> Emission	6,114.92	0.08	9,313.76	0.74	0	0	15,428.68	0.82
Fuel Consumption	9,533.92	0.6	6,139.26	0.49	0	0	15,673.18	1.09
Peat Oxidation	0	0	0	0	0	0	0	0
<b>Sink</b>								
Crop Sequestration	-148,713.85	-1.95	-255,880.14	-20.4	0	0	-404,593.99	-22.35

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Conservation Sequestration	- 157,656.45	-2.07	- 285,650.19	- 22.78	0	0	- 443,306.64	- 24.85
<b>Total</b>	<b>- 172,035.4</b>	<b>- 2.26</b>	<b>- 317,695.15</b>	<b>- 25.33</b>	<b>0</b>	<b>0</b>	<b>- 489,730.55</b>	<b>- 27.59</b>

\*Note: Includes both estates and smallholders

**Summary of Mill Emission and Credit**

	tCO <sub>2</sub> e	tCO <sub>2</sub> e/tFFB
<b>Emission</b>		
POME	14,941	0.17
Fuel Consumption	291.64	0
Grid Electricity Utilization	0	0
<b>Credit</b>		
Export of Grid Electricity	0	0
Sales of PKS	0	0
Sales of EFB	0	0
<b>Total</b>	<b>15,232.64</b>	<b>0.17</b>

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

Emissions	tCO <sub>2</sub> e
PK from own mill	-73,447.46
PK from other source	0
Fuel Consumptions	0
<b>Total Crusher emissions</b>	<b>-73,447.46</b>

\*This mill has no kernel crusher operation.

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

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

**Appendix D: Supply Chain Declaration**

<b>A. Monthly Records of Certified and Uncertified FFB Received since the last audit</b>				
<b>No.</b>	<b>Month - Year</b>	<b>Volume of FFB from certified supply bases (mt)</b>	<b>Volume of FFB from uncertified supply bases (mt)</b>	<b>Total FFB/Month (mt)</b>
1	Nov 18	8,893.08	2,694.18	11,587.26
2	Dec 18	8,398.16	2,475.92	10,874.08
3	Jan 19	10,299.46	2,569.94	12,869.40
4	Feb 19	11,482.8	2,302.74	13,785.54
5	Mar 19	10,708.7	1,802.26	12,510.96
6	Apr 19	16,889.82	1,514.32	18,404.14
7	May 19	14,557.2	1,374.76	15,931.96
8	June 19	8,529.33	1,030.86	9,560.19
9	July 19	7,631.08	1,197.12	8,828.20
10	Aug 19	9,692.84	1,538.86	11,231.70
11	Sept 19	9,049.06	2,925.64	11,974.70
12	Oct 19	9,029.98	2,553.14	11,583.12
	<b>Total</b>	<b>125,161.51</b>	<b>23,979.74</b>	<b>149,141.25</b>

<b>B. Monthly Records of Certified CPO &amp; PK since the last audit</b>			
<b>No.</b>	<b>Month - Year</b>	<b>Certified CPO (mt)</b>	<b>Certified PK (mt)</b>
1	Nov 18	2,011.34	385.10
2	Dec 18	1,899.31	348.82
3	Jan 19	2,447.47	430.16
4	Feb 19	2,742.29	477.96
5	Mar 19	2,442.47	420.3
6	Apr 19	4,090.00	706.72
7	May 19	3,316.68	582.58
8	June 19	2,091.09	363.28
9	July 19	1,645.70	293.66
10	Aug 19	2,249.40	407.81
11	Sept 19	1,974.13	358.06
12	Oct 19	1,955.70	364.13
	<b>Total</b>	<b>28,865.58</b>	<b>5,138.58</b>

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<b>C. Records of Certified CPO &amp; PK Sold under PalmTrace to Buyers since the last audit (if any)</b>				
No.	Buyers Name	Palmtrace Trading License Number	Certified CPO Sold (mt)	Certified PK Sold (mt)
Apr 19	Awala Mill KCP	TR-404f70b2-72cb	0	775
Aug 19	Awala Mill KCP	TR-e65214a6-6147 and TR-6027e4a4-f212	0	3,750
<b>Total</b>			<b>0</b>	<b>4,525</b>

<b>D. Records of CPO &amp; PK Sold under other schemes to Buyers since the last audit (if any)</b>				
No.	Buyers Name	Scheme Name	CPO Sold (mt)	PK Sold (mt)
May 19	XYZ	ISCC	3,035.77	0
<b>Total</b>			<b>3,035.77</b>	<b>0</b>

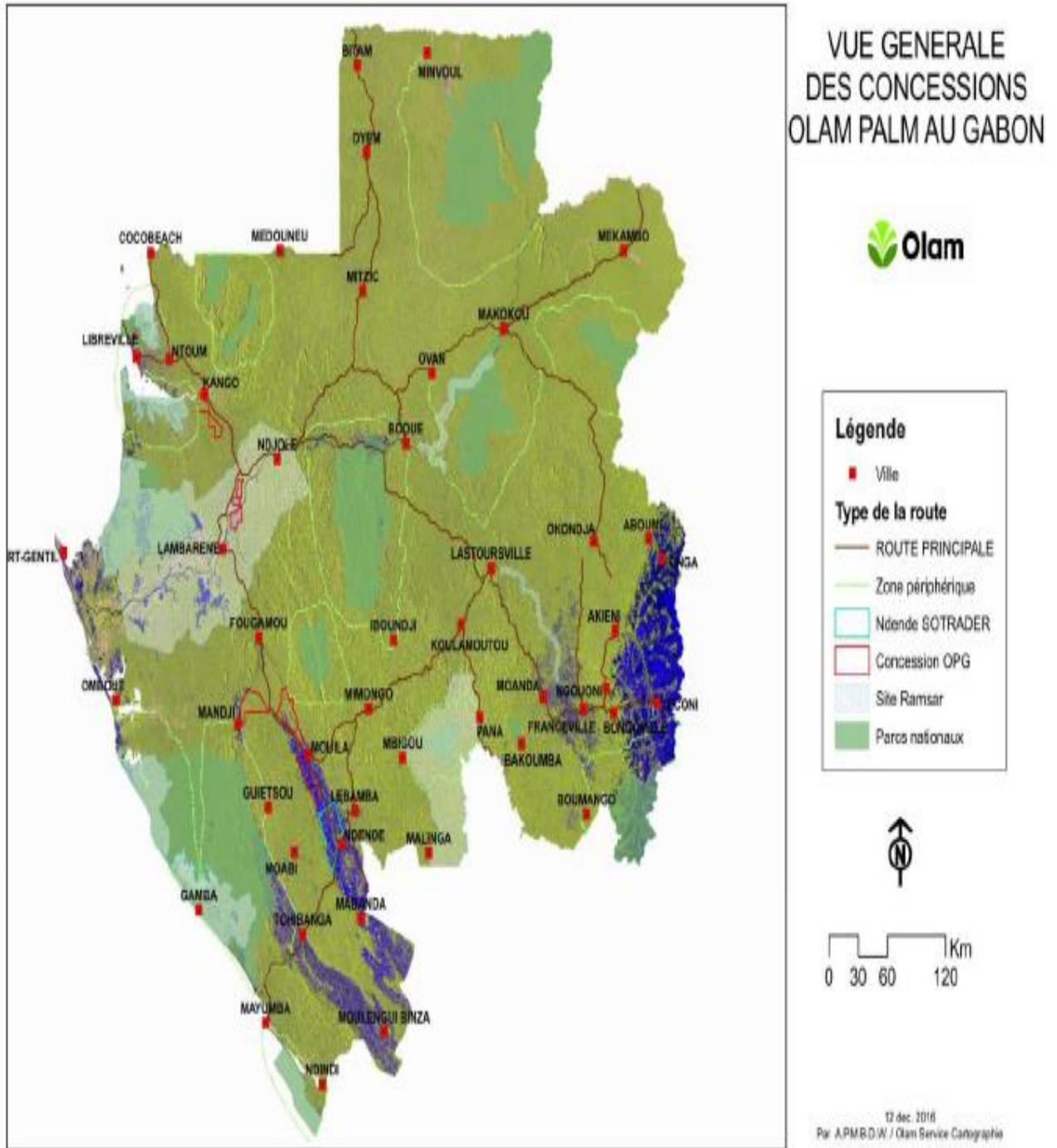
<b>E. Records of CPO &amp; PK Sold as conventional to Buyers since the last audit (if any)</b>				
No.	Buyers Name	CPO Sold (mt)	PK Sold (mt)	
Nov 18	Olam Lambarene Refinery	1,263.14	0	
Dec 18	Olam Lambarene Refinery	1,903.86	0	
Jan 19	Olam Lambarene Refinery	1,921.10	0	
Feb 19	Olam Lambarene Refinery	2,009.08	0	
Mar 19	Olam Lambarene Refinery	968.56	0	
Apr 19	Olam Lambarene Refinery	1,624.60	0	
May 19	Olam Lambarene Refinery	2,009.08	0	
June 19	Olam Lambarene Refinery	1,374.50	0	
July 19	Olam Lambarene Refinery	1,940.24	0	
Aug 19	Olam Lambarene Refinery	559.24	0	

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Sept 19	Olam Lambarene Refinery	1,889.62	0
Oct 19	Olam Lambarene Refinery	1,159.48	0
<b>Total</b>		<b>18,622.5</b>	<b>0</b>

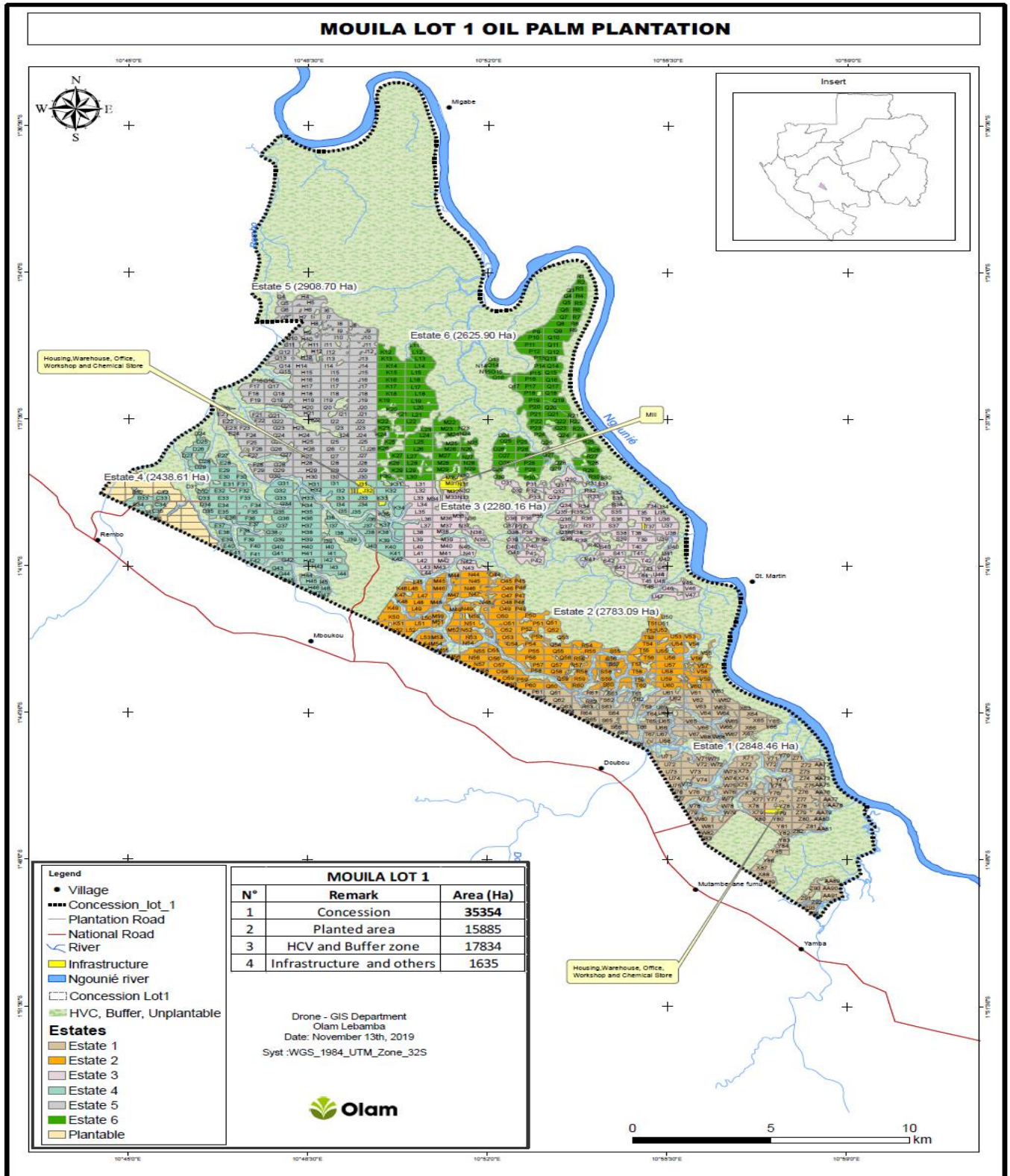
<b>F. Records of Certified CPO Sold under RSPO Credits to Buyers since the last audit (if any)</b>			
<b>No.</b>	<b>Buyers Name</b>	<b>PalmTrace Trading License Number</b>	<b>RSPO Credits of Certified CPO Sold (mt)</b>
Nil			

**Appendix E: Location Map of Olam Bilala Palm Oil Mill Certification Unit and Supply bases**

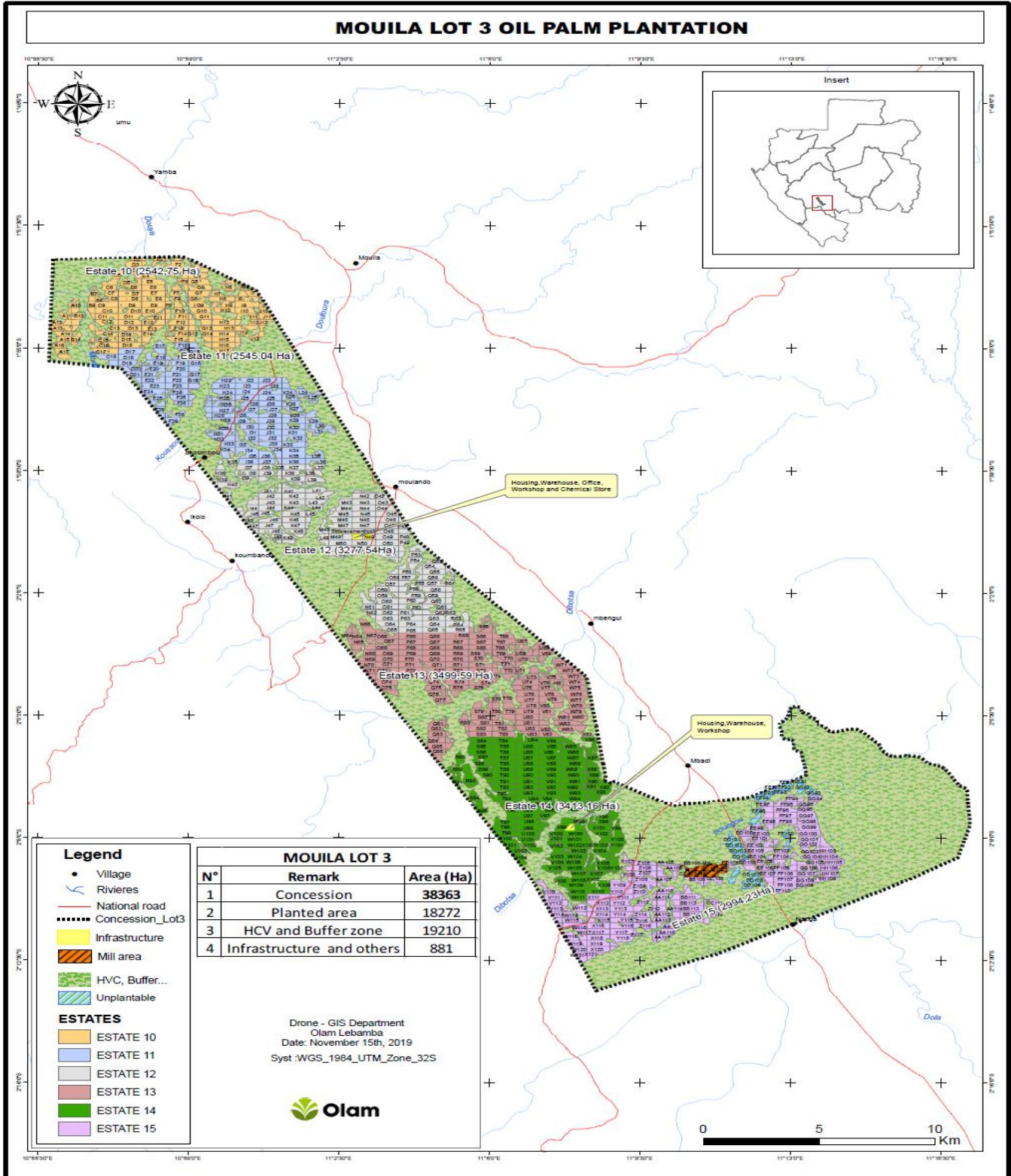




**Appendix F: Estate Field Map (Mouila Lot 1 & 3 Concession)**







**Appendix G: List of Smallholder Sampled** *(If applicable – scheme/associated/group certification)*

## Appendix H: List of Abbreviations

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