

RSPO PRINCIPLE AND CRITERIA PUBLIC SUMMARY REPORT

☐ Initial Assessment

☒ Annual Surveillance Assessment (1_1)

☐ Recertification Assessment (Choose an item.)

☐ Extension of Scope

Client Company Name / Parent Company: Olam Group Limited
Client Company / Parent Company Address: 7 Straits View, Marina One East Tower #20-01, Singapore 018936, Singapore
Certification Unit: Olam Palm Gabon SA - Bilala Palm Oil Mill
Location of Certification Unit: PK 19 National Road N1, Mouila, Gabon
Date of Final Report: 06/03/2024

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Section 1: Scope of the Assessment

1. Company Details			
Parent Company	Olam Group Limited		
RSPO Membership Number	1-0379-22-000-00	Membership Approval Date	09/10/2006
Address	7 Straits View, Marina One East Tower #20-01, Singapore 018936, Singapore		
Palm Oil Mill / Group Manager / Estate (Certification Unit)	Olam Palm Gabon SA - Bilala Palm Oil Mill		
Location / Address	PK 19 National Road N1, Mouila, Gabon		
Website	www.olamgroup.com		
Management Representative	Mahamadou DAO	E-mail	Mohamed.olamnet.com
Telephone	+24166006178	Facsimile	-

2. Certification Information			
Certificate Number	RSPO 671034	Certificate Start Date	28/12/2022
Date of First Certification	28/12/2017	Certificate Expiry Date	27/12/2027
Scope of Certification	Production of Sustainable Crude Palm Oil (CPO) and Palm Kernel (PK)		
Visit Objectives	<ul style="list-style-type: none"> Determination of the conformity of the client's management system, or parts of it, with audit criteria. Evaluation of the ability of the management system to ensure the client organization meets applicable statutory, regulatory and contractual requirements. 		
Assessment Cycle	<input type="checkbox"/> Pre Assessment (Choose an item.) <input type="checkbox"/> Initial Assessment <input checked="" type="checkbox"/> Annual Surveillance Assessment (ASA 1_1) <input type="checkbox"/> Recertification Assessment (Choose an item.) <input type="checkbox"/> Scope Extension		
Applicable Standards / Normative Reference	RSPO Certification System for P&C and RSPO ISH 2020 <input checked="" type="checkbox"/> Gabon National Interpretation 2019 of the RSPO P&C 2018		
Supply Chain Module	<input checked="" type="checkbox"/> Identity Preserved; <input type="checkbox"/> Mass Balance	Mill Capacity	90 mt/hr
ISH certification Phase	<input type="checkbox"/> Eligibility <input type="checkbox"/> Milestone A <input type="checkbox"/> Milestone B <input checked="" type="checkbox"/> Not Applicable		
Is this a remote audit or on-site audit	<input checked="" type="checkbox"/> On-site audit (Option AI)	<input type="checkbox"/> On-site audit (Option AII)	<input type="checkbox"/> Remote audit (Option B)

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

4. Location(s) of Mill & Supply Bases			
Name (Mill / Supply Base)	Location	GPS Coordinates	
		Latitude	Longitude
Olam Palm Gabon SA-Bilala POM	Lot 1 Mboukou Bilala, National Road N1, Mouila, Gabon	1° 39' 7.72" S	10° 51' 17.07" E
Estate 1 (Lot 1 Plantation)	Lot 1 Mboukou Bilala, National Road N1, Mouila, Gabon	1° 46' 37.30" S	10° 57' 43.80" E
Estate 2 (Lot 1 Plantation)	Lot 1 Mboukou Bilala, National Road N1, Mouila, Gabon	1° 41' 25.70" S	10° 51' 20.20" E
Estate 3 (Lot 1 Plantation)	Lot 1 Mboukou Bilala, National Road N1, Mouila, Gabon	1° 40' 2.65" S	10° 53' 57.64" E
Estate 4 (Lot 1 Plantation)	Lot 1 Mboukou Bilala, National Road N1, Mouila, Gabon	1° 39' 29.80" S	10° 49' 53.50" E
Estate 5 (Lot 1 Plantation)	Lot 1 Mboukou Bilala, National Road N1, Mouila, Gabon	1° 38' 13.20" S	10° 47' 24.10" E
Estate 6 (Lot 1 Plantation)	Lot 1 Mboukou Bilala, National Road N1, Mouila, Gabon	1° 37' 2.67" S	10° 52' 54.07" E
Estate 7 (Lot 2 Plantation)	Lot 1 Mboukou Bilala, National Road N1, Mouila, Gabon	1° 39' 0.73" S	10° 26' 18.26" E
Estate 8 (Lot 2 Plantation)	Lot 1 Mboukou Bilala, National Road N1, Mouila, Gabon	1° 34' 21.69" S	10° 27' 48.48" E
Estate 9 (Lot 2 Plantation)	Lot 1 Mboukou Bilala, National Road N1, Mouila, Gabon	1° 32' 42.95" S	10° 30' 59.97" E
Note: The Plantations (Lots) has been broken down into estates for ease of managements but are managed as a whole.			

5. Description of Supply Base					
New Planting Development	<input checked="" type="checkbox"/> No			<input type="checkbox"/> Yes	
Estate / Smallholders	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted
Mouila Lot 1	15,885	18,323	1,147	35,355	44.93%
Mouila Lot 2	9,060	21,543	1,197	31,800	28.49%

Total	24,945	39,866	2,344	67,155	37.14%
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Note: Since the estate 1-6 and estate 7-9 are managed by the same management team and each estate are closed to each other, the reporting on the areas have been merged according to the nature of the estate management.

6. Plantings & Cycle

Estate / Smallholders	Age (Years) - ha				Mature	Immature
	0 - 3	4 - 14	15 - 25	>25		
Estate 1 (Lot 1)	-	2,848	-	-	2,848	-
Estate 2 (Lot 1)	-	2,783	-	-	2,783	-
Estate 3 (Lot 1)	-	2,280	-	-	2,280	-
Estate 4 (Lot 1)	-	2,439	-	-	2,439	-
Estate 5 (Lot 1)	-	2,909	-	-	2,909	-
Estate 6 (Lot 1)	-	2,626	-	-	2,626	-
Estate 7 (Lot 2)	-	3,237	-	-	3,237	-
Estate 8 (Lot 2)	-	2,601	-	-	2,601	-
Estate 9 (Lot 2)	-	3,222	-	-	3,222	-
Total (ha)	-	24,945	-	-	24,945	-

Note: Only Mature area is considered as production area

7. Summary of Certified Tonnage of FFB (Own Certified Scope)

Estate	Tonnage (MT) / year			
	Estimated last year (Dec 2022 - Nov 2023)	Actual (Nov 2022 - Oct 2023)		Forecast (Nov 2023 - Oct 2024)
		Previous license period (Nov 22-Feb 23)	Current license period (Mar 23 to Oct 23)	
Mouila Lot 1	207,653.00	27,726.00	104,505.46	185,036.00
Mouila Lot 2	87,883.00	17,002.32	35,912.30	77,606.00
Total	295,536.00.00	185,146.08		262,642.00

Note: The projection/forecast figures are low because for the last 10 years, 2023 has been the year the company recorded the largest hydric deficit . So that impacted the 2024 production

8. Summary of Certified Tonnage of FFB (from other certified unit(s))

Estate	Tonnage (MT) / year			
	Estimated last year (Dec 2022 - Nov 2023)	Actual (Nov 2022 - Oct 2023)		Forecast (Nov 2023 - Oct 2024)
		Previous license period	Current license period	

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		(Nov 22- Feb 23)	(Mar 23 - Oct 23)	
Mouila Lot 3		975	2,071	
Total		3,046		

Note: Note: Lot 3 Plantation is certified under Dola POM certification unit.

9. Summary of Non-Certified Tonnage of FFB (outside supplier – excluded from certificate)

Out growers / smallholders	Tonnage (MT) / year			
	Estimated last year (Dec 2022 - Nov 2023)	Actual (Nov 2022 - Oct 2023)		Forecast (Nov 2023 - Oct 2024)
		Previous license period (Nov 22- Feb 23)	Current license period (Mar 23 - Oct 23)	
NA	NA	NA	NA	NA
Total	-	-	-	-

Note:

9A. Monthly Records of Certified and Uncertified FFB Received since the last audit

No.	Month - Year	Volume of FFB from certified supply base (mt)	Volume of FFB from uncertified supply base (mt)	Total FFB/Month (mt)
1	November 2022	13,245.08	0	13,245.08
2	December 2022	16,780.18	0	16,780.18
3	January 2023	17,128.58	0	17,128.58
4	February 2023	16,300.64	0	16,300.64
5	March 2023	20,492.62	0	20,492.62
6	April 2023	26,782.14	0	26,782.14
7	May 2023	28,261.80	0	28,261.80
8	June 2023	17,530.80	0	17,530.80
9	July 2023	13,090.06	0	13,090.06
10	August 2023	671.4	0	671.4
11	September 2023	15,718.30	0	15,718.30
12	October 2023	2,190.48	0	2,190.48
TOTAL		188,192.08	0	188,192.08

Note:

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10. Summary of Certified Tonnage (MT) (not applicable for ISS)			
Estimated last year (Dec 2022 - Nov 2023)	Actual (Nov 2022 - Oct 2023)		Forecast (Nov 2023 - Oct 2024)
	Previous license period (Nov 22 to Feb 23)	Current license period (Mar 23 to Oct 23)	
FFB	FFB		FFB
295,536.00 mt	65,454.48 mt	141,737.60 mt	262,642.00 mt
	TOTAL	207,192.08 mt	
CPO (OER: 23.36 %)	CPO (OER: 24.83 %)		CPO (OER: 24.00 %)
69,037.21 mt	15,117.64 mt	36,333.19 mt	63,034.08 mt
	TOTAL	51,450.83 mt	
PK (KER: 3.50 %)	PK (KER: 3.36 %)		PK (KER: 4.00 %)
10,343.76 mt	2,215.78 mt	4,249.32 mt	10,505.68 mt
	TOTAL	6,965.10 mt	
Note: The projection/forecast figures are low because for the last 10 years, 2023 has been the year the company recorded the largest hydric deficit . So that impacted the 2024 production			

10A. Monthly Records of Certified CPO & PK since the last audit			
No.	Month - Year	Certified CPO (MT)	Certified PK (MT)
1	November 2022	2,697.21	489.52
2	December 2022	2,902.10	587.28
3	January 2023	3,975.45	496.40
4	February 2023	4,942.88	642.58
5	March 2023	4,982.96	674.80
6	April 2023	5,931.22	851.13
7	May 2023	6,980.59	1018.16
8	June 2023	5,901.44	610.83
9	July 2023	4,995.21	446.95
10	August 2023	3,867.62	15.06
11	September 2023	3,941.51	589.36
12	October 2023	332.64	43.03
TOTAL		51,450.83	6,965.10
Note:			

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11. Summary of Actual Volume sold					
Current License period (Mar 2023 to Oct 2023)					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	Others		
CPO (MT)	1,000.740	-	-	27,057.263	28,058.000
PK (MT)	2,057.000	-	-	-	2,057.000
Credits	3,134.000	-	-	-	3,134.000
Previous License period (Nov 2022 to Feb 2023)					
CPO (MT)	0	-	-	19,204.913	19,204.913
PK (MT)	0	-	-	-	-
Credits	0	-	-	-	-
Note:					

11A. Records of Certified CPO & PK Sold under PalmTrace since the last audit (if any)				
No.	Buyers Name	PalmTrace Trading License Number	Certified CPO Sold (MT)	Certified PK Sold (MT)
1	Louis Dreyfus Company Asia Pte	RSPO_PO1000001872	1,000.74	0
2	Bilala KCP	RSPO_PO1000011348	0	2,057.00
TOTAL			1,00.74	2,057.00
Note:				

11B. Records of certified CPO & PK Sold under other schemes since the last audit (if any)				
No.	Buyers Name	Scheme Name	Certified CPO Sold (MT)	Certified PK Sold (MT)
1	NA	NA	NA	NA
TOTAL			NA	NA
Note:				

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11C. Records of CPO & PK Sold as conventional since the last audit (if any)			
No.	Buyers Name	CPO Sold (MT)	PK Sold (MT)
1	OPG Refinery (Lambarene)	18,014.26	0
2	Louis Dreyfus Company Asia Pte	4747,697	0
3	SCR MAYA (Cameroun)	12,612,277	0
4	AZUR SA	7950,881	0
5	IBI SA	993.45	0
6	HACC	1,943.611	0
TOTAL		46,262.176	0
Note:			

11D. Records of Certified CPO Sold under RSPO Credits since the last audit (if any)			
No.	Buyers Name	PalmTrace Trading License Number	RSPO Credits of Certified CPO Sold
1	ACT Commodities B.V.	RSPO_PO1000008745	3,134
TOTAL			3,134
Note:			

12. Independent Smallholders Certified Tonnage (MT) / Volume Not Applicable									
Phase	Estimated last year (Dec 2022 - Nov 2023)			Actual (Nov 22 - Oct 23)			Forecast (Nov23 to Oct 24)		
	Eligibility	MS A	MS B	Eligibility	MS A	MS B	Eligibility	MS A	MS B
	40%	70%	100%	40%	70%	100%	40%	70%	100%
FFB									
IS-CSPO	NA	NA		NA	NA		NA	NA	
IS-CSPKO	NA	NA		NA	NA		NA	NA	
IS-CSPKE	NA	NA		NA	NA		NA	NA	
CSPK	NA	NA		NA	NA		NA	NA	

12A. Monthly Records of Certified CPO, PK & PKE (equivalent) produced since the last audit						
No.	Month - Year	FFB (MT)	Certified CPO (MT)	Certified PK (MT)	Certified PKO (MT)	Certified PKE (MT)
NA	NA	NA	NA	NA	NA	NA
TOTAL						
Note: 1 mt = 1 credit						

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

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

Section 2: Assessment Process

Certification Body:

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

Suite 29.01 Level 29, The Gardens North Tower,

Mid Valley City, Lingkaran Syed Putra,

59200 Kuala Lumpur, Malaysia.

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

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

2.1 Assessment Methodology, Programme, Site Visits

The on-site assessment was conducted from the **8th to 12th January 2024**. The audit programme is included as Section 2.3. Where applicable, prior to the initial certification and recertification audit, 30 days Public Notification was made through the RSPO and BSI website.

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

The Critical NC close out off-site assessment was conducted on **14th February 2024**. The audit programs are included in Section 2.3.

The methodology for collection of objective evidence included physical site inspections, observation of tasks and processes, interviews of staff, workers and their families and external stakeholders, review of documentation and monitoring data. Gabon National Interpretation 2019 of the RSPO P&C 2018 was used as the normative reference to assess compliance. The comments made by external stakeholders were also taken into account in the assessment.

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

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

Structured worker interviews with male and female workers and staff were held in private at the workplace in the mill and the estates. Fieldworkers were interviewed informally in small groups in the field. In addition, the wives of workers and staff were interviewed in informal group meetings at their housing. Separate visits were made to each of the local communities to meet with the village head and residents. Company officials were not present at any of the internal or external stakeholder interviews. A list of Stakeholders contacted is included as Section 3.4.

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

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

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

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

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

Assessment Program					
Name (Mill / Supply Base)	Year 1 (Re- Certification)	Year 2 (ASA1-1)	Year 3 (ASA1-2)	Year 4 (ASA1-3)	Year 5 (ASA1-4)
Olam Palm Gabon SA-Bilala POM		✓	✓	✓	✓
Estate 1 (Lot 1 Plantation)			✓	✓	
Estate 2 (Lot 1 Plantation)			✓		✓
Estate 3 (Lot 1 Plantation)	✓			✓	
Estate 4 (Lot 1 Plantation)			✓	✓	
Estate 5 (Lot 1 Plantation)		✓			✓
Estate 6 (Lot 1 Plantation)	✓	✓			
Estate 7 (Lot 2 Plantation)			✓	✓	
Estate 8 (Lot 2 Plantation)	✓	✓			✓
Estate 9 (Lot 2 Plantation)	✓	✓			✓

Tentative Date of Next Visit: November 11, 2024 - November 15, 2024

Total Number of Mandays: 15 mandays

2.2 BSI Assessment Team

Name	Role	Competency
Dennis Acquah	Team Leader	<p>Education:</p> <p>BSc. In Natural Resource management with specialization in Silviculture and Forest Management from Kwame Nkrumah University of Science and technology, Kumasi, Ghana; MSc in logistic and Supply Chain Management from Kwame Nkrumah University of Science and technology, Kumasi, Ghana</p> <p>Work Experience:</p> <p>RSPO Lead Auditor with audit experience across Asia, West, Central and South Africa, Rainforest Alliance Lead Auditor, Project Coordinator (Forest and Biodiversity). Also experienced in implementing forest governance project, building relations, and sustaining communications with forest communities, acting as resource person for awareness and training and engaging government towards policy reforms. 14 years of experience as an Operation Managers having worked with two of the leading timber processing industries in Ghana</p> <p>Training attended:</p> <p>Non-Conformity writing, Interviewing 7-hour training, Gender Inclusion in Agri-commodity Production, Introduction to Responsible Business, Introduction to the Multi-stakeholder Process, Natural Resource Conflict Management, Respecting the Rights of IPs and LCs, Successfully completed the Endorsed RSPO P&C 2018 Lead Auditor Course; Endorsed RSPO SCCS Lead Auditor Course, Endorsed RSPO P&C Lead Auditor Refresher Training, SA 8000, ISO 9001, ISO 45001, FSC Forest management/CoC Lead Auditor Course, Rainforest Alliance Sustainable Agriculture Standard (RA SAS) Farm/CoC Lead Auditor Course. Have also participated in ESIA and SEA trainings</p> <p>Attended several RSPO online trainings which includes, FPIC, DWL, RSPO Dispute Settlement Facility, RSPO Palm GHG Assessment, Introduction to RSPO P&C Metric Template, Gender Guidance to RSPO, Palm trace New Features for ISH, RSPO Remediation and Compensation Procedures, RSPO revised NPP 2021.</p> <p>Language proficiency:</p> <p>English</p> <p>Aspect covered in this audit:</p> <p><input type="checkbox"/> Good Agriculture Practice <input type="checkbox"/> Health and Safety <input type="checkbox"/> Supply chain requirements <input checked="" type="checkbox"/> Social <input type="checkbox"/> Environmental <input type="checkbox"/> Market Communication and claim requirements <input type="checkbox"/> ISH context (ICS, internal audit, policy, business planning and trading system)</p>
Valence Shem	Team Member	<p>Education:</p>

		<p>BTech (Hons) Bachelor Degree in Industrial Technology, University of Science Malaysia</p> <p>Work Experience:</p> <ol style="list-style-type: none"> 1. 9 years working experience in oil palm plantation industry 2. Management system auditing since 2009 for various standards such as ISO 140001, RSPO P&C, RSPO SCCS, MSPO and SMETA <p>Training attended:</p> <ol style="list-style-type: none"> 1. ISO 14001 Lead Auditor Course 2. ISO 9001 Lead Auditor Course 3. Endorsed RSPO P&C Lead Auditor Course 4. Endorsed RSPO SCCS Lead Assessor Course 5. MSPO Awareness Training 6. ISO 45000 Lead Auditor Course 7. SMETA Auditor training 8. HCV-HCS training 9. RSPO-endorsed RSPO ISH Standard 2019 Lead Auditors Course <p>Language proficiency: English</p> <p>Aspect covered in this audit:</p> <p><input type="checkbox"/> Good Agriculture Practice <input checked="" type="checkbox"/> Health and Safety <input checked="" type="checkbox"/> Supply chain requirements</p> <p><input type="checkbox"/> Social <input type="checkbox"/> Environmental <input checked="" type="checkbox"/> Market Communication and claim requirements</p> <p><input type="checkbox"/> ISH context (ICS, internal audit, policy, business planning and trading system)</p>
John Takang	Team Member	<p>Education:</p> <p>BSc. Environmental and Resources Management, Brandenburg University of Technology, Cottbus - Germany.</p> <p>Bachelor of Arts in literature, specialised in English, Université de Cocody, Abidjan</p> <p>Work Experience:</p> <ol style="list-style-type: none"> 1. 4 years' experience in social audit, sustainable agriculture, and certification of agricultural production systems 2. 8 years' experience working with smallholder farmers, organising into groups and providing different trainings (ICS, good agricultural practices, etc) 3. RSPO auditing since 2019 <p>Training attended:</p>

		<ol style="list-style-type: none"> 1. ISO 14001 Lead Auditor Course 2. Endorsed RSPO P&C Lead Auditor Course 3. HCV-HCS training 4. RSPO-Smallholder Academy Master Training Course <p>Language proficiency: English and French</p> <p>Aspect covered in this audit:</p> <p><input checked="" type="checkbox"/> Good Agriculture Practice <input type="checkbox"/> Health and Safety <input type="checkbox"/> Supply chain requirements</p> <p><input type="checkbox"/> Social <input checked="" type="checkbox"/> Environmental <input type="checkbox"/> Market Communication and claim requirements</p> <p><input type="checkbox"/> ISH context (ICS, internal audit, policy, business planning and trading system)</p>
Aime Fulgence	Gbakre Translator	<p>Education: Holds a qualification in Vocational Bachelor in Quality Control and Environment Management, ESTC, Abidjan (2018), Vocational training Certificate in cooperation, specialised in Cooperative management, Ecole Régionale d'Agriculture du Sud (ERA Sud Bingerville), Abidjan (2010), Marketing-Communication and Advertising Design Engineer, Institut des Technologies d'Abidjan (2009), Marketing-Communication and Advertising Techniques Engineer, Institut des Technologies d'Abidjan (2008), Bachelor of Arts in literature, specialised in English, Université de Cocody, Abidjan (2005), HND in Human Resources Management and Corporate Communication, ESSECT Henri Poincaré, Abidjan (2005), and Baccalauréat in Literature, Lycée Moderne d'Aboisso, Aboisso (2002).</p> <p>Work Experience: Has four years' experience in social audit, sustainable agriculture, and certification of agricultural production systems.</p> <p>Training attended: Successfully completed the ISO 9001 Lead Auditor Course, RSPO Endorsed P&C Lead Auditor Course, Endorsed RSPO P&C Lead Auditor Refresher Training, Child Labor Centered Due Diligence Process / Abidjan, and Gender workshop for Associated trainers / Abidjan.</p>

Accompanying Persons:

Name	Role
NA	NA

2.3 Assessment Plan

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

Date	Time	Subjects	DA	JT	VS	AFG
DAY 1 Monday 08/01/2024	0800hrs To 0900hrs	Main Office Opening Meeting with Bilala Management Team and staff to include: Introductions, updates from Bilala Management; review audit scope, Finalise audit plan, Any introduction and updates to RSPO and BSI standards and protocols.	✓	✓	✓	✓
	0900hrs to 1200hrs	Estate 5 (Lot 1) Field verification <ul style="list-style-type: none">• Best agricultural practices• Manuring, Spraying, Harvesting• HCV / Conservation Area• Legal compliance / boundary• Chemical / Pesticide / PPEs, Pesticide and Fertilizer Stores /Change rooms• Workers interviews (including workers rights, issues, wages, conditions)	✓	✓	✓	✓
	1200hrs to 1330hrs	Lunch	✓	✓	✓	✓
	1330hrs To 1600hrs	Main Office Document Review related SEIA and Plans (3.4), Effective Integrated Pest Management (7.1), Pesticide Use (7.2), Waste management (7.3), Soil health fertility (7.4), Soil conservation (erosion and degradation) (7.5), Soil survey and topographic information (7.6), Peat (7.7), Water quality and quantity (7.8), Energy Use (7.9), Pollution and GHGs – Palm GHG (7.10) Fire (7.11), and HCV and HCS (7.12)	✓	✓	✓	✓
		Stakeholder consultations Communities (Lot 1)	✓	✓	✓	✓
	1600hrs to 1630hrs	Audit Team Meets to consolidate day's findings	✓	✓	✓	✓
	1630hrs to 1700hrs	Debriefing of days findings to Management and ends the day's work	✓	✓	✓	✓

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Date	Time	Subjects	DA	JT	VS	AFG
DAY 2 Tuesday 09/01/2024	0800hrs to 1200hrs Estate 1& 2	Estate 6 (Lot 1) Field verification <ul style="list-style-type: none"> • Best agricultural practices • Manuring, Spraying, Harvesting • HCV / Conservation Area • Legal compliance / boundary • Chemical / Pesticide / PPEs, Pesticide and Fertilizer Stores /Change rooms • Workers interviews (including workers rights, issues, wages, conditions) 	✓	✓	✓	✓
	1200hrs	Lunch				
	1330hrs 1600hrs	Main Office Document Review related SEIA and Plans (3.4), Effective Integrated Pest Management (7.1), Pesticide Use (7.2), Waste management (7.3), Soil health fertility (7.4), Soil conservation (erosion and degradation) (7.5), Soil survey and topographic information (7.6), Peat (7.7), Water quality and quantity (7.8), Energy Use (7.9), Pollution and GHGs – Palm GHG (7.10) Fire (7.11), and HCV and HCS (7.12) Stakeholder consultations Workers Representatives (Lot 1) Gender Committee (Lot 1)	✓	✓	✓	✓
	1600hrs to 1630hrs	Audit Team Meets to consolidate day's findings	✓	✓	✓	✓
	1630hr to 1700hrs	Debriefing of days findings to Management and ends the day's work	✓	✓	✓	✓
DAY 3 Wednesday 10/01/2024	0800hrs to 1200hrs Estate 3	Estate 8 (Lot 2) Field verification <ul style="list-style-type: none"> • Best agricultural practices • Manuring, Spraying, Harvesting • HCV / Conservation Area • Legal compliance / boundary • Chemical / Pesticide / PPEs, Pesticide and Fertilizer Stores /Change rooms Workers interviews (including worker's rights, issues, wages, conditions) 	✓	✓	✓	✓
	1200hrs	Lunch				

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Date	Time	Subjects	DA	JT	VS	AFG
	1330hrs to 1600hrs	Main Office Document Review related SEIA and Plans (3.4), Effective Integrated Pest Management (7.1), Pesticide Use (7.2), Waste management (7.3), Soil health fertility (7.4), Soil conservation (erosion and degradation) (7.5), Soil survey and topographic information (7.6), Peat (7.7), Water quality and quantity (7.8), Energy Use (7.9), Pollution and GHGs – Palm GHG (7.10) Fire (7.11), and HCV and HCS (7.12) Stakeholder consultations Communities (Lot 2)	✓	✓	✓	✓
	1600hrs to 1630hrs	Audit Team Meets to consolidate day's findings	✓	✓	✓	✓
	1630hr to 1700hrs	Debriefing of days findings to Management and ends the day's work	✓	✓	✓	✓
DAY 4 Thursday 11/01/2024	0800hrs to 1200hrs	Estate 9 (Lot 2) Field verification <ul style="list-style-type: none"> • Best agricultural practices • Manuring, Spraying, Harvesting • HCV / Conservation Area • Legal compliance / boundary • Chemical / Pesticide / PPEs, Pesticide and Fertilizer Stores /Change rooms • Workers interviews (including worker's rights, issues, wages, conditions) 	✓	✓	✓	✓
	1200hrs	Lunch				

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Date	Time	Subjects	DA	JT	VS	AFG
	1330hrs to 1600hrs	Main Office Document Review related SEIA and Plans (3.4), Effective Integrated Pest Management (7.1), Pesticide Use (7.2), Waste management (7.3), Soil health fertility (7.4), Soil conservation (erosion and degradation) (7.5), Soil survey and topographic information (7.6), Peat (7.7), Water quality and quantity (7.8), Energy Use (7.9), Pollution and GHGs – Palm GHG (7.10) Fire (7.11), and HCV and HCS (7.12) Stakeholder consultations Workers Representatives (Lot 2) Gender Committee (Lot 2) Labour Contractors (Lot 2)	√	√	√	√
	1600hrs to 1630hrs	Audit Team Meets to consolidate day's findings	√	√	√	√
	1630hr to 1700hrs	Debriefing of days findings to Management and ends the day's work	√	√	√	√
DAY 5 Friday 12/01/2024	0800hrs to 1200hrs	Supply Chain for the POM (3.8) • Demonstration of legal entity • Roles and responsibility and ICS • Procedures/manual/SOP • Record of purchase – • Record of sales– • RSPO rules on market communication and claims Mill Walk through and inspection: <ul style="list-style-type: none"> Workshops, Stores and POM application, Mill Safety and Health / PPE / Signage, Waste Management / Environment	√	√	√	√
	1200hrs	Lunch				
	1330hrs to 1500hrs	Closing Meeting Preparation: Auditors consolidate notes and confirm audit findings	√	√	√	√
	1500hrs to 1600hrs	Pre-Closing Meeting and Review of Findings: Convene with Management and Sustainability Team to discuss audit findings and potential non-conformities	√	√	√	√

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Date	Time	Subjects	DA	JT	VS	AFG
	1600hrs to 1700hrs	Closing Meeting and End of Audit Convene with all relevant staff to summarize audit findings, potential non-conformities and next steps	✓	✓	✓	✓

Critical NC Offsite Closure Plan

Date	Time	Subjects	DA	AGF
Wednesday 14/02/2024	0800-0830	Opening Meeting with Bilala Management Team and staff to include: Introductions, updates from Bilala Management; review audit scope, Finalise audit plan, Any introduction and updates to RSPO and BSI standards and protocols.	✓	✓
	0830hrs to 0900hrs	Community Consultations <ul style="list-style-type: none"> • Guiamba • Moutambe Same Fumu • Migabe • Doubou 	✓	✓
	0900hrs to 1000hrs	Closing Meeting and End of Audit Convene with all relevant staff to summarize audit findings and next steps	✓	✓

Section 3: Assessment Findings

3.1 Multiple Management Units and Time Bound Plan

Requirement	Assessment	Compliance
Does the time bound plan include all current subsidiaries, estates and mills that is under the control and/or minor shareholding of the holding company?	Yes. Olam Palm Gabon SA-Billa POM has a Time Bound Plan and it includes all of its management units and mills.	Complied
Have all the estates and mills certified within five (5) years after obtaining RSPO membership? If no, has RSPO Secretariat approval obtained? Was the submission according to the template as announced by the RSPO Secretariat on 21/12/2021	All units of OPG have been certified. The last on the plan is Graine (Ndende) which was certified in 2022.	Complied
Have there been any new acquisitions? If yes, the new acquisitions shall be certified within three (3) years from the date of acquisition. Certification plan for the new acquisition shall be available. If no, has RSPO Secretariat approval obtained? Was the submission according to the template as announced by the RSPO Secretariat on 21/12/2021.	No new acquisition of land.	Complied
Any deviations from the maximum periods requires approval by the RSPO Secretariat.	Review of the plan does not show any deviation as the estates and mills have been certified as scheduled.	Complied
Have there been any changes to the time-bound plan since the last audit (both new acquisition and existing)? If yes, justification is required. Is this consistent with the ACOP reporting?	There has not been any changes to the plan and this is consistent with the ACOP reporting 2021.	Complied
Have there been any isolated lapses in implementation of the plan? If yes a Minor non-compliance shall be raised	No isolated lapses identified in the implementation of the plan.	Complied
Have there been any fundamental failure (e.g. unable to justify delay in planning the assessments) to proceed with implementation of the plan? If yes a Major non-compliance shall be raised	No fundamental failures to implement the plan. The assessment are been carried out as planned.	Complied
Un-Certified Units or Holdings		
No replacement of primary forest or any area required to maintain or enhance HCVs and HCS in accordance with RSPO P&C criterion 7.12.	NA as all certification units have been certified.	Not Applicable
Any new plantings since January 1 st 2010 shall comply with the RSPO New Plantings Procedure.	NA as all certification units have been certified.	Not Applicable
Any Land conflicts are being resolved through a mutually agreed process, such as RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO P&C criteria 4.4, 4.5, 4.6, 4.7 and 4.8. <i>Note:</i>	NA as all certification units have been certified.	Not Applicable

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<p><i>The RSPO RaCP tracker shall be checked to confirm for any land conflicts/Liabilities https://www.rspo.org/certification/remediation-and-compensation/racp-tracker. The progress on the Liabilities shall be verified and reported.</i></p> <p><i>Please refer to BSI-RSPO Secretariat approval.</i></p>		
Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 4.2	NA as all certification units have been certified.	Not Applicable
Any Legal non- compliance is being addressed through measures consistent with the requirements of RSPO P&C criteria 2.1	NA as all certification units have been certified.	Not Applicable
Did the company conduct internal audit for those uncertified estates against the uncertified management units requirement and covering the RSPO P&C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12? If yes, a positive assurance statement shall be available and justified.	NA as all certification units have been certified.	Not Applicable
Are there any Critical (Major) non-compliance raised against any of the RSPO P&C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12 during the last internal audit of the uncertified estates? If yes is the NC(s) actively addressed with RSPO?	NA as all certification units have been certified.	Not Applicable
Have there been any stakeholder (including NGO) consultation conducted?	NA as all certification units have been certified.	Not Applicable

3.2 Progress of scheme smallholders and/or outgrowers

Progress of scheme smallholders or outgrowers towards compliance with relevant standards		
Requirement	Remarks	Compliance
<p>Has 100% of scheme smallholders and/or scheme outgrowers comply with the standard within three years of the mill's initial certification?</p> <p>OFI shall be raised if after one year where 100% of the scheme smallholders and scheme outgrowers are not in compliance, a minor NC after two years, and a major NC if this requirement is not met after three years.</p>	NA as all certification units have been certified.	Not Applicable

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Approved Time Bound Plan

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

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	RSPO initial certification ³								Dec 18			
	RSPO surveillance audit											
Makouke	Inclusion under Olam RSPO membership						Aug 16					
	RSPO initial certification ⁴									July 19		
	RSPO surveillance audit											
Mouila LOT 2	NPP notification			Dec 13								
	RSPO initial certification										Dec 20	
	RSPO surveillance audit											
GRAINE	SOTRADER joined RSPO					July 15						
	NPP notification						June 16					
	RSPO independent gap assessment							Dec 17				
	RSPO initial certification ¹											Dec 21
	100% certification of GRAINE Palm SH											Dec 21

¹ SOTRADER GRAINE Ndende initial certification is postponed from 2020 to 2021 due to immature field and on-going finalization of schemed smallholders' organization structure.

3.3 Details of Nonconformities

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

During this Assessment there were two (2) Critical; zero (0) Minor nonconformities and six (6) Opportunity For Improvement raised. Olam Palm Gabon SA-Bilala POM 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 Actions for the Critical Nonconformities has been verified for its effectiveness and closed accordingly. The below is the summary of the non-conformity raised during this assessment.

Non-conformity			
NCR Ref #	2444845-202401-M1	Issued Date	12/01/2024
Due Date	04/04/2024	Closure Date	14/02/2024
Indicator & Category (Critical / Minor)	3.4.3 (Critical)		
Statement of Nonconformity:	The social and environmental management plan and the monitoring plan for Bilala POM has neither been reviewed nor updated		
Requirement Reference:	The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way.		
Objective Evidence:	<p>The social and environmental management and monitoring plan of Bilala Mill is being implemented as demonstrated by annual reports submitted to Gabonese National authorities (i.e. Directorate in charge of Environment and Nature Protection – DGEPN).</p> <p>However, the social and environmental management and monitoring plan of Bilala POM has not been reviewed or updated as required by the indicator.</p>		
Corrections:	<ul style="list-style-type: none"> - Initiate immediately the update of the ESMP in consultation with the relevant stakeholders - Establish a schedule for the whole process of the ESMP update 		
Root Cause Analysis:	<ul style="list-style-type: none"> - OPG Bilala and its supply base use to submit to government environment office, the annual report regarding the implementation progress of the existing Environment and Social Management Plan (ESMP). However, there is no defined responsibility and clear system in place to check and ensure the update of the relevant assessments (ESMP-ESIA) as required by RSPO standard. - There is an internal audit system in place to assess the compliance with the standard requirements but during the last internal audit conducted in July 2023, only the update of the plantation ESMP has been verified. 		
Corrective Actions:	<ul style="list-style-type: none"> - Put in place a document review system to ensure their validity/update. Specific focus on document validity during internal audits. 		
Assessment Conclusion:	<ol style="list-style-type: none"> 1. The company made available for review a documented schedule captioned Data Collection for the review of the ESIA plan. The schedule indicates the company plans of meeting with the various communities on the 29th February 2024 to discuss the revision of the ESIA plan and urged all the relevant parties to be part of the review process. The schedule list all the communities and the plan time for each community meetings. The 		

	<p>communities include Doubou, Sait-Martin, Rembo, Migabe, Guidouma and others,</p> <ol style="list-style-type: none"> 2. Copies of the scheduled program has been shared with each of the relevant communities and each community chief has signed acknowledging receipt of the schedule. 3. Interview with the community chiefs on the 14th February 2024 confirmed their awareness of the schedule for the ESIA plan revision and also confirmed their readiness to participate in the entire process. They also confirmed copies of the scheduled meetings has been shared with them. <p>Based on the evidences reviewed, the NC is closed. The NCR closeout was conducted off site.</p>
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Non-conformity			
NCR Ref #	2444845-202401-M2	Issued Date	12/01/2024
Due Date	04/04/2024	Closure Date	14/02/2024
Indicator & Category (Critical / Minor)	7.2.10 (Critical)		
Statement of Nonconformity:	The specific annual medical surveillances for pesticide operators were conducted more than one year.		
Requirement Reference:	Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated.		
Objective Evidence:	The latest annual medical surveillance (cholinesterase test) for pesticide operators for Lot 1 was last conducted on 18/12/2023. The second last was conducted on 27/05/2022 for the same operators, which was more than one year apart.		
Corrections:	<ul style="list-style-type: none"> - Revise the existing medical check procedure to capture the prohibition to exceed 12 months between two consecutives medical check for the sprayers unless there is acceptable reason. If so, proper record regarding these reasons must be kept. - Socialize the new procedure to all the relevant departments (Estate/Assistant Managers – HR- SD- Doctors). 		
Root Cause Analysis:	<ul style="list-style-type: none"> - No proper alert system in place at the clinic level to identify compliant and non-compliant sprayers in term of testing. - OPG Lot 1 plantation has a specific medical check procedure in place for the chemical operators. The frequency defined into the procedure is yearly and it is not clearly stated that the time between two consecutives tests cannot exceed 12 months. - List provided by plantation team to the doctor was not updated 		
Corrective Actions:	<ul style="list-style-type: none"> - Monthly verification/cross checking on the field to be done by Sustainability Department (SD) regarding the medical compliance of all sprayers (Lot 1 & Lot 2). 		

	<ul style="list-style-type: none"> - Annual schedule of specific medical check to be shared by the site doctor with a reminder 2 weeks before the date. - Regular (Quarterly) awareness sessions with all the spraying gangs.
Assessment Conclusion:	<ol style="list-style-type: none"> 1. The company has revised their SOP for Medical Checks on the chemical operators. The revised SOP with referenced number SOP N°13/SD-MC (1)/0124 and approved for implementation on the 31/01/2024. The procedure was revised to ensure the two medical checks on the chemical handlers are conducted twice with the 12 months. Reasons and records are to be provided when it exceeds the 12 months period 2. The revised procedure has been shared with all the relevant manager by the sustainability manager. Reviewed a mail sent on the 08/02/2024. 3. Reviewed records of monthly verification checks to monitor medical compliance by all the sprayers. Some of the records reviewed are dated 04/01/2024 and 12/02/2024 4. The company has developed a scheduled for an annual medical check. The schedule reviewed has the names of all the pesticide handlers and their schedule date for the checkup. <p>Based on the evidences reviewed, the NC is closed. The NCR closeout was conducted off site.</p>

Opportunity for Improvements	
OFI #	Description
2444845-202401-I1	Indicator 3.7.1 OPG Bilala has documented their annual training program. Nonetheless, the accessibility of the program to all workers can be further improved.
2444845-202401-I2	Indicator 6.7.1 OPG Bilala is conducting their safety committee meeting on quarterly basis. Nonetheless, the participation from workers representatives can be further improved.
2444845-202401-I3	Indicator 7.2.1 The understanding of the definition of pre-mixed herbicides can be further improved since there is a difference of practice between Lot 1 and Lot 2. At Lot 1, the practice is by filling in the 20 lt of jerry cans, the practice is by filling in the 20 lt of jerry cans with 20 lt of water and 80 ml of glyphosate, then bring them to the field that to be filled directly to the 16 lt knapsack sprayers. Whereas at Lot 2, the practice is by filling in a jerry can with 10 lt of glyphosate and 10 lt of water. The solution is then brought to the field. From that jerry can, the operators then take 100 ml (as dosage) to be filled in their 16 lt knapsack spray which had been filled with water earlier.
2444845-202401-I4	Indicator 7.2.8 The recording of the empty chemical containers inventory can be further improved to ensure traceability of their movement.
2444845-202401-I5	Indicator 7.3.2

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	During a visit to the housing in Lot 1 and 2, it was observed that the waste at the housing are yet to be evacuated. Interview with the housing supervisors indicates the waste accumulation was the result of one and half months (October to mid-November) strike by the workers. Currently the company has signed an agreement with Geoqualitys, a waste management company for the collection of waste in both Lot 1 and 2. An OFI is raised against the indicator to monitor the progress made in the evacuation in subsequent audits
2444845-202401-I6	Indicator 7.8.1 OPG Bilala ensures that workers have adequate access to safe drinking water through a system of water treatment stations. However, the quality and overall acceptance of water supplied to workers can still be improved.

Positive Findings	
PF #	Description
PF 1	Management shown strong commitment to the certification process
PF 2	PPE distribution and use by the workers is commendable

3.3.1 Status of Nonconformities Previously Identified and Opportunity for Improvement

Previous Audit Critical (Major) Non-conformity			
NCR Ref #	2275234-202211-M1	Issued Date	26/11/2022
Due Date	24/02/2023	Closure Date	31/01/2023
Indicator & Category (Critical / Minor)	3.6.1 (Critical)		
Statement of Nonconformity:	Some H&S risks were not identified.		
Requirement Reference:	All operations are risk assessed to identify H&S issues. Mitigation plans and procedures are documented and implemented.		
Objective Evidence:	<ol style="list-style-type: none"> At Bilala POM, there was an accident happened on 06/08/2022 where a worker fell his foot in a drain that contained hot water near the kernel bunker. Due to the injury, he was given medical leave from 06/08 to 12/09/2022. However, the risk from this incident was not assessed in the S&H Risk Evaluation. Based on site visit at the FFB stockpile at Estate 9, field no. K7, the FFB truck driver has demonstrated that in order to put on the net to cover the FFB in the truck bin, he has to be on top of the truck which is significantly high without attached to any safety harness. However, the risk of working at height for this activity was not identified in the S&H Risk Evaluation. 		
Corrections:	<ol style="list-style-type: none"> Revise the risk assessment to capture the hazard related to the hot water at the Kernel bunker and FFB collection process at the FFBs stockpile locations Provide adequate PPE as per the risk assessment requirements 		

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Root Cause Analysis:	OPG has a risk assessment identifying what hazards currently exist or may appear in the workplace and are likely to cause harm to employees and/or visitors. However, there is no clear procedure to define the scope and how often the risk assessment has to be reviewed/updated to ensure its relevancy.
Corrective Actions:	<ol style="list-style-type: none"> 1) Establish a procedure regarding the risk assessment review process 2) Communicate the revised risk assessment to all the relevant persons (Management – AMs..) with clear identification of the required PPEs 3) Regular inspection/audit of the practices to check the compliance with the requirements
Assessment Conclusion:	<p>Evidence verified:</p> <ol style="list-style-type: none"> 1) Revised risk assessments [dated 12/01/2023 (mill) and 16/01/2023 (estates)] that show the hazard related to the hot water at the Kernel bunker and FFB collection process at the ramp have been captured. In the risk assessment document, the basis of reviewing has been inserted at the summary page i.e., annually, new activity, and accident occurrence. 2) Bilala POM: Based on site visit, the drain where the incident happened has been covered with metal plate to prevent persons from accidentally step into. 3) Estate 9: The FFB stockpile had been discontinued and currently a new FFB ramp is in used. It was witnessed on site that the use of safety harness and lifeline adjustment was done correctly by the ramp operators. <p>The evidence of correction and corrective actions was found to be adequate to close the NCR. Continuous effective implementation shall be verified in the next assessment visit.</p>
Effectiveness Closure (for previous audit closed Critical NC):	<p>Bilala POM is still maintaining their current risk assessment document (last revised on 26/12/2023) and updated from time to time should there be any necessity. There has been no incident related felling into drain that containing hot water. Trainings on safety were also given regularly.</p> <p>Ramp attendant at the sampled estates continued to wear the safety harness whenever needed. The harnesses were seemed to be in good condition, and the attendants were able to demonstrate the usage and importance of the PPE.</p> <p>The corrective actions were found to be well implemented and no recurrence of non-conformity. Thus, this non-conformity report remains closed.</p>

Previous Audit Critical (Major) Non-conformity			
NCR Ref #	2275234-202211-M2	Issued Date	26/11/2022
Due Date	24/02/2023	Closure Date	31/01/2023
Indicator & Category (Critical / Minor)	6.7.3 (Critical)		
Statement of Nonconformity:	Workers were found not using the appropriate personal protective equipment (PPE) at the place of work.		

Requirement Reference:	Workers use appropriate personal protective equipment (PPE), which is provided free of charge to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, land preparation, and harvesting. Sanitation facilities for those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing.
Objective Evidence:	<ol style="list-style-type: none"> 1) Three workers at the mill's FFB ramp have not been provided with ear plug as required in the company's PPE matrix. 2) At the FFB ramp of Estate 8, the worker who was assigned to put on the net to cover the FFB in the truck's bin was using the safety harness since he was working at height. However, the rope (lifeline) attached to his harness was too long, in which if he fell from the top of the bin, he will still hit the ground. 3) One of the FFB loaders at Estate 9 was found not wearing safety shoes as required in the PPE matrix while loading the FFB into a tractor at Field no. J08. 4) Two contract harvesters were found not wearing safety shoes as required in the PPE matrix while harvesting at Field no. Q18, Estate 6.
Corrections:	<ol style="list-style-type: none"> 1) Provide the required/adequate PPE for the concerned workers 2) Refresher training on safety harness usage with specific focus on lifeline adjustment
Root Cause Analysis:	<ol style="list-style-type: none"> 1) Lack of understanding by EHS Assistant of the requirement of risk assessment review and related mitigation measures 2) OPG has a PPE matrix in place and kept by EHS department and not shared with all the users (Estate Managers- field Assistants) who supposed to distribute to the workers 3) Issue on the accuracy of the order (Boot ordered without any specification on the type) 4) Training on safety harness has been conducted but no specific focus on lifeline adjustment. 5) Unavailability of some correct shoes size
Corrective Actions:	<ol style="list-style-type: none"> 1) To train the mill's EHS Assistant on the requirement of risk assessment review and related mitigation measures 2) Anticipate the PPE orders taking in account the delay issue 3) Ensure the supplier deliver the right shoes size which has been ordered. All suppliers will be informed to strictly follow the placed order regarding shoes size. Any delivery of shoes size more than the quantity requested without prior approval from Olam will be denied. 4) Follow-up of the issue related to shoes size order and delivery to be highlighted by Sustainability Department and Estate Managers and discussed during Monthly business review meeting to ensure proper actions are continuously taken 5) Share the PPE matrix with all the users (Estate Manager- Assistant Managers)

Assessment Conclusion:	<p>Evidence verified:</p> <ol style="list-style-type: none"> 1) Record that shows the training on the requirement of risk assessment review and related mitigation measures has been given to the mill's EHS Assistant 2) Records that show the required/adequate PPE has been provided to the concerned workers i.e., ear plugs for the mill's ramp operators, safety boots to the FFB loaders, and the correct size of safety boots to the harvesters. 3) Record that shows the refresher training on safety harness usage has been provided 4) Evidence that shows the PPE matrix has been shared with all the users (Estate Manager-Assistant Managers) i.e., through emails and display at the office notice boards. 5) Bilala POM: It was witnessed that the ramp operators have been provided with earplugs and able to show them on-site. 6) Estate 8: It was witnessed on site that the use of safety harness and lifeline adjustment was done correctly by the ramp operators. 7) Estate 9: It was witnessed that the FFB loader was wearing his safety shoes while carrying out the FFB loading work 8) Estate 6: It was witnessed that the harvesters were wearing their safety shoes while carrying out the harvesting work <p>The evidence of correction and corrective actions was found to be adequate to close the NCR. Continuous effective implementation shall be verified in the next assessment visit.</p>
Effectiveness Closure (for previous audit closed Critical NC):	Based on site visits at the various operations such as harvesting & evacuation, fertiliser application, herbicides spraying, and mill operations to name a few, all workers were observed to be wearing proper PPE according to their PPE matrix. There was no recurrence of non-conformity. Thus, this non-conformity report remains closed.

Previous Audit Minor Non-conformity			
NCR Ref #	2275234-202211-N1	Issued Date	26/11/2022
Due Date	08/01/2024	Closure Date	12/01/2024
Indicator & Category (Critical / Minor)	3.3.2 (Minor)		
Statement of Nonconformity:	The checking of consistent implementation of a procedure was not effectively demonstrated.		
Requirement Reference:	A mechanism to check consistent implementation of procedures is in place.		
Objective Evidence:	There were 2 workers (#016065 and #001122), respectively from Estate 6 and Estate 3 who were, according to the bio-metric system, assigned to chemical spraying in Jul & Aug 2022 (for worker #016065), and Jun & Sep 2022 (for worker #001122), prior to undergoing any medical examination by an appointed doctor.		

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	This is not in-line with the company's SOP on Medical Check of Chemical Operators, SOP No. 13/SD-MC(0)/0820, rev.0, Clause 5.a.
Corrections:	Update the IT digital data to ensure the task performed by the workers/staff is corresponding to the real situation.
Root Cause Analysis:	Olam initiated a digital system for the information related to the workers and their post of activity called AgriPal. Sometimes some workers are transferred from an activity to another without proper communication with IT department in charge of system update
Corrective Actions:	<p>Establish a procedure to Manage the transfer of workers from an activity to another to highlight the critical/relevant and mandatory steps to be respected during workers transfer</p> <p>Communicate properly that procedure to all relevant persons (Managers - Assistants – HR – IT)</p> <p>Regular reconciliation and update of the digital data in consultation with the all the departments</p> <p>Continue to refer to the SOP referring to the Specific medical check for the sprayers</p>
Assessment Conclusion:	<p>1) Employee Transfer Procedure to a High-Risk Position [SOP-HR-MEPR/12/23, ver. 1, dated Dec 2023] to establish, define and describe the details of the approach followed within the company in terms of functional mobility (transfer) of an employee working in a position with a derisory risk (almost non-existent) to a position recognised as being certain at certain risk, in order to ensure that the latter's health is preserved, and on the other hand the movement is well captured in the various integrated system for managing employee attendance and performance (AgriPal, Sage, OGBS, etc.)</p> <p>2) The procedure was communicated to all the managers through email dated 11/01/2024, from HR Manager for Mouila Cluster</p> <p>3) E.g., communication between Estate 3 Assistant Manager (Ulrich) to the IT Manager (Parfait Edu) through email dated 5/12/2023 informing that list of 8 sprayers transferred from Estate 2 to Estate 3. That is for the IT department to update the transfer information in the AgriPal System.</p> <p>The implementation of correction and corrective actions were found to be effective. There was no recurrence of non-conformity. Thus, the minor NC is closed.</p>

Previous Audit Minor Non-conformity			
NCR Ref #	2275234-202211-N2	Issued Date	26/11/2022
Due Date	08/11/2024	Closure Date	12/01/2024
Indicator & Category (Critical / Minor)	7.3.1 (Minor)		
Statement of Nonconformity:	HSE Gabon collected and transported empty pesticide containers without the required authorisation from the Government of Gabon		
Requirement Reference:	A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented.		

Objective Evidence:	OPG signs agreements with external service providers to collect and treat different types of waste such as plastics, scrap metals, biomedical waste, spent oils and spent batteries. For the collection, transportation and treatment of waste, an authorisation from the government of Gabon is required. The service provider HSE Gabon collected waste corresponding to 3,004 Kg of empty pesticide packaging (bags, containers); waste collection receipt number 00000051; from OPG Lot 2 in Mandji waste storage site on 24/11/2022 at 10.00 a.m. However, the legal permit [Autorisation pour la collecte, transport et traitement des dechets, No.: 001673/MFMEPCPAT/SG/DGEPN] of the service provider had expired since 13/11/2022.
Corrections:	Stop all the planned waste collection with HSE Gabon for the time being until further notice Send a letter to HSE Gabon to inform that the contract with them is temporarily suspended until receipt of their updated license
Root Cause Analysis:	OPG has an agreement with the Service Provider called HSE Gabon for the recyclable waste collection and disposal. There is a checklist verification system in place before any signature of agreement with all service providers but there is no system to monitor continuously the validity of the service provider's documents to ensure the compliance is met.
Corrective Actions:	Include into the contract template with all the Service Providers a specific clause saying that the Service Provider will be systematically asked to provide his agreement for the verification before any planned waste collection. In case the document is expired, the planned collection activity will be suspended until proof of the renewal of the required document (license) is provided. Verification to be done during all Legal and RSPO internal audits.
Assessment Conclusion:	OPG sent an e-mail message to HSE Gabon informing HSE Gabon that all activities relating to collection, transportation and treatment of waste are suspended until a new and valid authorisation is submitted. The e-mail dated 02/12/2022 was seen during the audit. HSE Gabon has submitted a new and valid authorisation from the government of Gabon for collection, transportation and final elimination of medical waste. Authorisation No.: 003/MEFMEPCPAT/SG/DGEPN/DRP, dated 10th February 2023.

Previous Audit Opportunity for Improvement	
OFI#	Description
2275234-202211-11	<p>OFI Statement:</p> <p>Indicator 3.3.3</p> <p>Although some records are promptly to demonstrate to auditor at the time of the audit, it may lead to future nonconformity if the retention method of some records such as "Notification D'accident de Travail" and workplace inspection "Imperative 3", which can further affect the retrieval time, is not addressed.</p> <p>Verification / Follow-up actions:</p> <p>OPG has digitized records such "Notification D'accident de Travail" into its AgriPal IT System and carries out regular reconciliation and update of the digital data in</p>

	<p>consultation with all the departments. IT data sheet for last 2 months were seen at the time of the audit</p> <p>Additionally, there was no non-conformity raised during the current audit.</p>
2275234-202211-I2	<p>OFI Statement:</p> <p>Indicator 4.2.2</p> <p>Interview with the representatives from the Boungounga community confirms the grievance procedure has been shared and explained to their understanding. They stated that the company has also shared copies of the grievance forms which they can fill to file a complaint. Based on interview, the community claimed that some of their complaints were not quickly responded which discouraged them to utilise the grievance form thereafter. Although the community could not present any evidence for the audit team to follow up, this is raised as an OFI for the company to enhance their engagements with the communities.</p> <p>Verification / Follow-up actions:</p> <p>The company had further engagements with the communities to refresh their understanding of the grievance procedure. Records of the engagement were made available for review</p> <p>Meeting with the Communities</p> <p>Date: 20th to 21 July 2023</p> <p>Venue: Lot 1 communities</p> <p>Attendance: 20 people</p>
2275234-202211-I3	<p>OFI Statement:</p> <p>Indicator 4.3.1</p> <p>The company has negotiated agreement with all communities in the operational area. Based on the agreement the company has developed an action plan towards the implementation of the project activities. The document captioned Chronogramme de Realisation des Projects Sociaux des Villages du Lot 2 is dated 05/09/2022. A review of the action plan shows the document has been signed by all the representatives of the communities. The effectiveness of the communication about the action plan to the communities and to a local NGO (Brain Forest) can be further improved as most of the community representatives are illiterates.</p> <p>Verification / Follow-up actions:</p> <p>The company had further engagements with the communities to refresh their understanding of the grievance procedure. Records of the engagement were made available for review</p> <p>Meeting with the Communities</p> <p>Date: 20th to 21 July 2023</p> <p>Venue: Lot 1 communities</p> <p>Attendance: 32 people</p>
2275234-202211-I4	<p>OFI Statement:</p> <p>Indicator 6.2.2</p>

	<p>On-going discussion between management and workers' representatives on aligning categorisation with salaries paid can be further improved by informing the representatives on every progress made by management</p> <p>Verification / Follow-up actions:</p> <p>Interview with the workers representatives indicates improved communications with management. The representatives confirmed on going negotiations with management for an improved workers conditions of service</p>
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3.3.2 Summary of the Nonconformities and Status

CAR Ref.	Category (Critical / Minor)	P&C Indicator	Issued Date	Status & Date (Closure)
2275234-202211-M1	Critical	3.6.1	26/11/2022	Closed on 31/01/2023
2275234-202211-M2	Critical	6.7.3	26/11/2022	Closed on 31/01/2023
2275234-202211-N1	Minor	3.3.2	26/11/2022	Closed on 12/01/2024
2275234-202211-N2	Minor	7.3.1	26/11/2022	Closed on 12/01/2024
2444845-202401-M1	Critical	3.4.3	12/01/2024	Closed on 14/02/2024
2444845-202401-M2	Critical	7.2.10	12/01/2024	Closed on 14/02/2024

3.4 Stakeholders and previous land owner / user consultation

Stakeholder consultation involved internal and external stakeholders. External stakeholders were contacted by telephone to arrange meetings at a location convenient to them to discuss Olam Palm Gabon SA-Bilala POM'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. Fieldworkers were interviewed informally in small groups in the field. In addition, the wives of workers and staff were interviewed in informal group meetings at their housing. Separate visits were made to each of the local communities to meet with the village head and residents. Company officials were not present at any of the internal or external stakeholder interviews. A list of Stakeholders contacted is included as below.

Stakeholders contacted		
Type of Stakeholder (e.g. Internal, Union, Contractor, Governmental Department, NGO, External, Communities)	Stakeholder name / organization	Means of communication (e.g. face to face interview, email, phone interview, comment from public notice)
Communities	Guidouma, Rembo, Mboukou, Kanana, Diangui, Mandji	Face to Face
Workers Representatives	Lot 1 and Lot 2	Face to Face

Gender Committee	Lot 1 and Lot 2	Face to Face
Contractors	2ASD, BIG SERVICE, DIFFO IDRIS SERVICES, SHADRAC, ENTREPRISE KILIS ENVIRONNEMENT, LOMBENG SERVICES, PAYE COMPTANT, PLANETE SOLUTIONS, SAPGA, JFA MANAGEMENT	Face to Face

Stakeholders comment	
1	<p>Feedbacks: The representatives from the Guidouma, Rembo, Mboukou, Kanana, Diangui and Mandji communities did not report of any issue of concern. They confirmed there are no disputes over land used by Olam for their palm plantations.</p> <p>Audit Team verification and response: Review of documents did not identify any concerns. There are evidences of company's support to community development as captured in their social contracts</p>
2	<p>Feedbacks: Workers Representatives Workers representatives from both Lot 1 and Lot 2 were engaged during this audit period. Some representatives from the Lot 2 raised issues of non-payment of some working hours. They also stated that payment of lunch allowance which were meant for all workers are only paid to some workers while others are not paid. Workers from the medical and security department are paid but not those in the plantations.</p> <p>Audit Team verification and response: On the issue of unpaid hours, the representatives could not provide any evidence to back their claims and as such could not be verified. Also, on the payment of lunch allowance to some workers while others are denied. Interview with management confirmed payment of lunch allowance but stated that such allowance are only paid to workers who are requested to stay on the work during their break time. They indicated such allowance are not paid to every one except workers who have been asked to stay on the job by their heads of department. This was confirmed from the review of some workers in the medical department and it was confirmed all such payment were based on request by the department.</p>
3	<p>Feedbacks: Gender committees The Gender Committees in both Lot 1 and Lot 2 did not report of any issue of concern.</p> <p>Audit Team verification and response: Interview with workers during the field visit did not identify any issue of concern</p>
4	<p>Feedbacks: The contractor Managers (2ASD, BIG SERVICE, DIFFO IDRIS SERVICES, SHADRAC, ENTREPRISE KILIS ENVIRONNEMENT, LOMBENG SERVICES, PAYE COMPTANT, PLANETE SOLUTIONS, SAPGA, JFA MANAGEMENT) in Lot 2 had only praises for management. They compare their relation with management now to about three years ago. They stated that there is a sense of openness in their current engagement with management. In all, they are having a good relations with management.</p> <p>Audit Team verification and response: Interview with contract workers and review of documents did not identify any issue of concern.</p>

List of land owner / user contacted					
Name	Years of ownership / used	Land area (ha)	Agreement (Yes / No)	Agreement base on FPIC (Yes/No)	Compliance on the agreement terms and conditions
Government of Gabon	50	67,155	Yes	Yes	Complied

Previous land owner / user comment	
	<p>Feedbacks:</p> <p>The company acquired the rights to land use after negotiation and agreement with the government of Gabon. Under the laws of the country, all land belongs to the state and as such can grant the right to land use. Although communities do not own land in Gabon, the state recognises the customary rights of communities over land and as such their interest (such as farming, fishing, hunting and access and respect for sacred areas and their traditions) are taking into considerations during the transfer of land rights to other entities.</p> <p>Audit Team verification and response:</p> <p>The audit team reviewed land title documents showing the legal rights to the use of the land by OPGBilala POM for their operations. Land title document for Lot 1, Permis Forestier Associé (P.F.A) N°74/11 du 09/11/2011 and for Lot 2 Permis Forestier Associé (P.F.A) N°74/12 du 20/01/2012 were issued under the laws of Gabon for the operations of the company. In recognition of the customary right to land by the communities and in compliance to the laws of Gabon, the company held a series of consultations with the communities to identify their needs and also contribute to community development. There was also participatory mapping of areas of community interest.</p>



3.5 Impartiality and conflict of interest

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

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Formal Signing-off of Assessment Conclusion and Recommendation

<p>The audit objectives have been achieved and the certificate scope is appropriate. Based on the results of this audit, it is concluded that Olam Gabon SA - Bilala Palm Oil Mill has complied with the Gabon National Interpretation 2019 of the RSPO P&C 2018 and audit criteria identified within the audit report. It is deemed that the management system has achieved its intended outcomes. Therefore, it is recommended that Olam Gabon SA - Bilala Palm Oil Mill is remain certified.</p>	
Report prepared by	Acceptance of Assessment Conclusion
Name: Dennis Acquah	Name: Mohammed Dao
Company Name: BSI Services Malaysia Sdn Bhd	Company Name: Olam Palm Gabon SA -Bilala POM
Title: Lead Auditor	Title: Sustainability Manager
Signature: 	Signature: <i>(I the undersigned, being the most senior relevant management representative of the operation seeking or holding certification, agree with the contents of this report and accept the liability in execution of the procedure in the report.)</i> 
Date: 14/02/2024	Date: 20/02/2024

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Appendix A: Summary of Findings

Criterion / Indicator		Assessment Findings	Compliance
Principle 1: Behave ethically and transparently			
Criterion 1.1: The unit of certification provides adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.			
1.1.1	(C) Management documents that are specified in the RSPO P&C are made publicly available. - Critical (Major) compliance -	<p>Olam Palm Gabon SA-Bilala POM has a list of management document that they make publicly available. The documents are made publicly available through display on notice boards around the estates and mill premises. The company has also shared copies of all such documents with the communities through their chiefs and representatives. Interview with leaders in the Mboukou, Rembo and Guidouma communities all confirmed receipt of the company documents. Among the documents shared were:</p> <ul style="list-style-type: none"> - Policy for the protection of reproduction rights - Sexual harassment policy - Child labour policy - Human rights policy - Policy on freedom of association and collective bargaining - Special labour policy - Code of Ethics policy - Whistle blower policy - HSE policy - Policy on equal opportunities in employment - Forced labour policy and trafficking, contract substitution and immigrant and temporary workers 	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		<ul style="list-style-type: none"> - The procedure for handling external complaints - Protection policy for protected areas - The procedure for the management of areas with High Conservation Values - The communication and consultation procedure 	
1.1.2	Information is provided in appropriate languages and accessible to relevant stakeholders. - Minor compliance -	As the official written and spoken language in Gabon is French, all their information was documented in French and shared with all relevant stakeholders. Interview with the Human Resource manager established that the company uses the French language in all communications with their stakeholders. Interview with the workers showed that although there are local languages in the Gabon, French is the commonly used language in all communications. Based on review, the documents mentioned in Indicator 1.1.1 were all available in French and accessible to all relevant stakeholders upon request.	Complied
1.1.3	(C) Records of requests for information and responses are maintained. - Critical (Major) compliance -	Addressed in <i>Procédure de gestion des demandes d'informations</i> (procedure for information request) [SOP No. 005/CRS DI (4)/0120, rev. 04, 17/01/2020]. There was no request for information from the stakeholders for the period under review. Should there be any, the request will be recorded in a logbook. The logbook has the information about the date of request, name of requestor, information requested and reason for the request.	Complied
1.1.4	(C) Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by a nominated management official. - Critical (Major) compliance -	The company has a documented procedure captioned <i>Procédure de Consultation et de Communication Avec les Communautés Locales</i> dated 02/07/2012. The procedure provides the information about how the company receives information and the timelines for responding to all information received. Interview with the	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		communities confirmed the procedure has been shared and communicated to their understanding	
1.1.5	There is a current list of contact and details of stakeholders and their nominated representatives. - Minor compliance -	The company maintains a list of their stakeholders which was made available for verification. Among the stakeholders listed are Local administrators, community representatives, NGO, workers' representatives, Health and safety committee, gender committee and contractors. The list has the information about the contact person, address, and telephone number of each stakeholder.	Complied
Criterion 1.2: 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. - Minor compliance -	OPG-Bilala has a documented code of conduct and Anti-Bribery and Corruption policy with the objective of conducting business in compliance with the letter and spirit of the law and other accepted standards of business conduct and to maximize shareholder value for its continuing shareholders in an ethical and environmentally sustainable manner. Among the values listed in their code of ethics are: <ol style="list-style-type: none"> 1) Anti-Bribery 2) Harassment 3) Health and Safety 4) Drugs and Alcohol use 5) Diversity and Inclusion 6) Integrity These values are communicated to the workers during induction of new workers, awareness programmes, display on the notice boards and morning musters. The policy has also been shared with the communities and contractors. Interview with the Mboukou, Rembo and Guidouma communities all confirmed the policy has been	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		shared and communicated to their understanding. The audit team also reviewed records of training with pictorial evidence of training of the company's policies including the code of conduct policy to their third-party contractors. Documented evidence of sharing copies of the policy to the third-party contractors were also verified.	
1.2.2	A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice. - Minor compliance -	The company implements the policy through internal regulations that defines and monitors the actions of workers. The company also conducts monthly internal assessment to check compliance to the country's laws and internal policies. To monitor compliance to the ethical policy by workers, the company through the human resource department conducts internal audits on daily basis. The assessment also covers compliance by the third-party contractors to ethical policy. The last internal audit was conducted on 10/07/2023 (mill) and 04/07-08/07/2023 (estates) covering the entire certification unit. There were several non-conformity reports raised as a result of the internal audit. However, none was related to ethical business practice.	Complied
Principle 2: Operate legally and respect rights			
Criterion 2.1: There is compliance with all applicable local, national and ratified international laws and regulations.			
2.1.1	(C) The unit of certification complies with the applicable legal and regulatory requirements. - Critical (Major) compliance -	The company has identified a number of laws applicable to their operations. These laws have been compiled into a single document and captioned <i>Liste Des Lois Et Conventions Applicables Aux Plantations Et Usines D'Olam Palm/Rubber Gabon</i> dated 5th June 2023. The applicable laws have been categorised into Land, Social/Labour law, Environment and many more. Some of the laws and evidence of compliance by the company were seen and reviewed. They include;	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		<p>Loi n° 6/75 du 25 Novembre 1975 portant code de la Sécurité Sociale.</p> <p>Evidence of compliance seen covers payment of the CNPS for the months of July, August and September 2023. The payment covers 3634 workers in July, 3530 workers of Olam in August and 3567 workers in September.</p> <p>Same seen for contract workers of Molviloise des Prestations Agricoles, Dirane Gamnue Ngala Services and Societe des transport et Agricole</p>	
2.1.2	<p>A documented system for ensuring legal compliance is in place. This system has a means to track changes to the laws and regulations in force, including listing and evidence of legal due diligence of all contracted third parties, recruitment agencies, service providers and labour contractors.</p> <p>- Minor compliance -</p>	<p>The company maintains a legal register with all the applicable and also conducts legal audits annually to ensure compliance to all applicable laws. The legal audits covers both the company and third party working on their site. The company's internal legal department track changes in the law through legal publications and official journal sites.</p>	Complied
2.1.3	<p>Legal or authorised boundaries are clearly demarcated and visibly maintained, and there is no planting beyond these legal or authorised boundaries.</p> <p>- Minor compliance -</p>	<p>To clearly show the limits of its concession, the unit of certification has established Concession Map (Carte de Localisation du PFA 01/12 de 31800 ha de la Société Olam Palm Gabon), dated February 2012.</p> <p>Olam Palm Gabon SA- Bilala certification unit has clearly demarcated the boundaries of its concession and these boundaries are maintained, as evidenced by boundary maintenance reports seen during the audit.</p> <p>For LOT 1:</p>	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		<p>Rapport de maintenance des bornes de la concession Olam Palm Gabon Mouila Lot 1. Field visits conducted from 18-24/09/2023. Report dated 25/09/2023.</p> <p>For LOT 2:</p> <p>Boundary maintenance activities are conducted as evidenced by: rapport des limites (bornes), dated 16/06/2023, after a field mission to maintain all 6 boundary pillars A, B, C, G, H, I in Lot 2.</p> <p>Additionally, field visits during the period of the audit did not reveal any planting outside the limits of the concession area.</p>	
Criterion 2.2: All contractors providing operational services and supplying labour, and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements.			
2.2.1	<p>A list of contracted parties is maintained.</p> <p>- Minor compliance -</p>	<p>Olam Palm Gabon SA-Bilala POM maintains a list of all their contracted parties in the stakeholder list for both Lot 1 and Lot 2 estates. There are a total of 25 contractors in Lot 2 and 50 contractors in Lot 1 providing various services which includes harvesting, pruning, slashing and the transportation of FFB and personnel. A sample of the contracts were selected for review and were found to be valid.</p>	Complied
2.2.2	<p>All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal requirements, and this can be demonstrated by the third party.</p> <p>- Minor compliance -</p>	<p>Reviewed sampled contracts between Olam-Bilala and</p> <ol style="list-style-type: none"> 1. Lombeng Services for farm activities 2. Kiliss Environnement for farm activities 3. Planete Solutions 4. Paye Contant 5. Societe Adams Services 	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		All contracts contain clauses on meeting applicable legal requirements. The audit team reviewed their business registration permit and annual license payment, and all were found to be compliant. There are no FFB suppliers in the operations of Olam Palm Gabon SA-Bilala POM.	
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. - Minor compliance -	Reviewed sampled contracts between Olam-Bilala and <ol style="list-style-type: none"> 1. Lombeng Services for farm activities 2. Kiliss Environnement for farm activities 3. Planete Solutions 4. Paye Contant 5. Societe Adams Services All contracts contain clauses on disallowing child, forced and trafficked labour. Review of sampled workers files and field observations did not establish the use of young workers in the operations of the company.	Complied
Criterion 2.3: All FFB supplies from outside the unit of certification are from legal sources.			
2.3.1	(C) For all directly sourced FFB, the mill requires: <ul style="list-style-type: none"> • Information on geo-location of FFB origins • Proof of the ownership status or the right/claim to the land by the grower/smallholder • Where applicable, valid commercial license, or is part of a cooperative which allows the buying and selling of FFB. PROCEDURAL NOTE:	Olam-Gabon, Bilala sources all their FFB from their own managed estates. Information on the legal right to the use of the land is provided in indicator 4.4.1. Also, information on the geo-locations are provided for under subsection 4 (Locations of Mill and Supply Base)	Complied

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Criterion / Indicator		Assessment Findings	Compliance
	The proof of the status or the right of ownership can be considered at first by the departmental exploitation contract. See decree N° 01497 of December 29, 2011, or the document of the ANUTTC. - Critical (Major) compliance -		
2.3.2	For all indirectly sourced FFB, the unit of certification obtains from the collection centres, agents or other intermediaries, the evidence as listed in Indicator 2.3.1. PROCEDURAL NOTE: For Implementation Procedure for 2.3.2 refer to Annex 4. - Minor compliance -	Not Applicable. The company does not source their FFB indirectly	Not Applicable
Principle 3: Optimise productivity, efficiency, positive impacts and resilience			
Criterion 3.1: There is an implemented management plan that aims to achieve long-term economic and financial viability.			
3.1.1	(C) A business or management plan (minimum three years) is documented that includes, where applicable, a jointly developed business case for Scheme Smallholders. - Critical (Major) compliance -	Olam Palm Gabon SA Bilala certification unit has developed a business plan that spans a period of 7 years. The plan includes annual budgets based on forecasts of FFB, oil extraction rates, kernel extraction rates, cost of upkeep, fertilizer costs, costs for mechanization, upkeep tools, harvesting, mill processing, research and development; overhead expenses (managers and staffs) and indirect expenses such as corporate allocation. There are no scheme smallholders within the supply base of Olam Palm Gabon Bilala certification unit.	Complied
3.1.2	An annual replanting programme projected for a minimum of five years with yearly review, is available. - Minor compliance -	At Olam Palm Gabon SA Bilala certification unit, planting was carried out in 2013 for Lot 1 and 2014 for Lot 2. Therefore, no replanting program is envisaged for the next five years.	Complied

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3.1.3	The unit of certification holds management reviews at planned intervals appropriate to the scale and nature of the activities undertaken. - Minor compliance -	Olam Palm Gabon Bilala certification unit holds management reviews as evidenced by Document No.: M-GSI.01, Issue 1 dated: 01/04/2016; Titled: Management Review Meeting_RSPO P&C Bilala POM & Supply Base. The last meeting held on 08/08/2023, organised by plantation manager. The agenda included: Mill performance; plantation performance (crop harvesting Statistics Report, FFB Quality, Crop Recovery, Yield – FTM & YTD Budget vs. Actual, rainfall and production, days, elephant damage.	Complied
Criterion 3.2: The unit of Certification regularly monitors and reviews their economic, social and environmental performance and develops and implements action plans that allow demonstrable Continuous improvement in key operations.			
3.2.1	(C) The action plan for continuous improvement is implemented, based on consideration of the main social and environmental impacts and opportunities of the unit of certification. - Critical (Major) compliance -	Olam Palm Gabon SA – Bilala Palm Oil Mill certification unit has developed a Continuous Improvement Plan, dated April 2019. Strategies for improvement covered in the plan include: IPM, compliance with OPG manuals in all sites, regular agronomy audits, annual environmental and social management (ESM) evaluation among other aspects.	Complied
3.2.2	As part of the monitoring and continuous improvement process, annual reports are submitted to the RSPO Secretariat using the RSPO metrics template. - Minor Compliance -	As part of the monitoring and continuous improvement process, Olam Palm Gabon SA Bilala certification unit has submitted an annual report using the metrics template to the RSPO Secretariat, and was verified during the audit.	Complied
Criterion 3.3: Operating procedures are Appropriately documented, consistently implemented and monitored.			
3.3.1	(C) Standard Operating Procedures (SOPs) for the unit of certification are in place.	Olam Palm Gabon certification unit has developed several SOPs to cover different aspects of its operations including agricultural SOP, EHS and RSPO-related SOP, as evidenced by:	Complied

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	- Critical (Major) compliance -	1. Olam Palm Agricultural Policy Manual, dated April 2013. Olam Palm Standard Operating Procedures for Palm Oil Mill, Version 1, dated 2015.	
3.3.2	A mechanism to check consistent implementation of procedures is in place. - Minor Compliance -	<p>Olam Palm Gabon SA Bilala certification unit has put in a place a mechanism to check consistent implementation of procedures through internal audits of different procedures, as evidenced by report titled RSPO internal audits 2023; and dated 10th July 2023, for both RSPO P&C and SCC, conducted by SD department.</p> <p>Additionally, OPG Bilala certification unit carries out random HSE audits as evidenced by actions such PPE random inspections conducted in estate 8:</p> <ul style="list-style-type: none"> • 06/06/2023 in block H20 & H21 for harvesters • 20/06/2023 in block I11 for loaders • 07/08/2023 in block I15 for sprayers (manual spraying) <p>05/07/2023 in block E32 for spraying activity, with signed attendance list</p>	Complied
3.3.3	Records of monitoring and any actions taken are maintained and available. - Minor Compliance -	<p>OPG Bilala maintains records of all actions taken and the records were seen during the audit. For instance, OPG conducts daily agronomy audits, which are eventually, compressed into monthly agronomy audits. The reports for 2023 were seen during the audit. The monthly audits cover: harvesting audit results - uncollected loose fruits (Kg/Ha), loose fruit from missed bunches (Kg/Ha), total losses FFB (Kg/Ha/Rd), potential crop losses (Kg/Ha/Rd).</p> <p>FFB grading results, manuring audit results, immature field upkeep, pest and diseases, research and development, weather station, training, etc. The monthly reports are then summarised</p>	Complied

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		into an annual agronomy audit report as evidenced for instance by: Olam Palm Gabon – Mouila Plantation – Lot 2, Agronomy Department, 6 th Report, Annual Agronomic report: "Palm Status, Leaf nutrient Survey, Crop Productivity, OER, KER, Audit results & 2024 Fertilizer Recommendation, dated December 2023."	
Criterion 3.4: A comprehensive Social and Environmental Impact Assessment (SEIA) is undertaken prior to new plantings or operations, and a social and environmental management and monitoring plan is implemented and regularly updated in ongoing operations.			
3.4.1	<p>(C) In new plantings or operations including mills, an independent SEIA, undertaken through a participatory methodology involving the affected stakeholders, and including the impacts of any smallholder/ outgrower scheme is documented</p> <p>- Critical (Major) compliance -</p>	<p>Olam Palm Gabon SA Bilala certification unit conducted an Environmental Impact Assessment titled: Environmental Impact Assessment related to the development of a Palm Plantation in the Zone of Mouila, Lot 1) of May 2012, Conducted by Ecosphere Sarl (BP, 655 Libreville Gabon).</p> <p>OPG Bilala equally conducted a SEIA for its plantation in Lot 2 titled: Etude d'Impact Environnemental – Implementation d'Une Palmeraie dans la Zone de Mouila (LOT 2), Olam Palm Gabon, Rapport Final. Janvier 2014; conducted by Ecosphere SARL, B.P. 655 Libreville, Gabon. Section 3.3.7 of the final report is dedicated to public consultations with national, provincial and local authorities, local elites and riparian village communities including: Moudouma, Yombi 3, Bemboudie, Boungounga, Fanguindaka, Lambarene-Kili, Kanan, Mandji, and Diangui.</p> <p>For the construction of its mill, OPG Bilala conducted a SEIA titled: Construction d'Une Huilerie et d'une Unite de Methanisation sur le permis d'Olam Palm Mouila Lot1. Etude d'Impact Environnemental et Social. Version Final revue apres Reunion de Validation (Dated : October 2015). The study was conducted by Terre Environnement</p>	Complied

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		Amenagement, BP. 831, Libreville-Gabon. Chapter 5 covers all environmental impacts (on air, surface waters, groundwaters, soils, air/climate, wildlife, forests, local communities, workers. Section 4.3.3 deals with consultations with local communities: Sain-Martin, Mighaba, Ningui, Rembo. The study equally addresses HCVs (Section 4.3.1.2).	
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. - Minor Compliance -	<p>Lot 1:</p> <p>Following the SEIA, a Social and environmental management and monitoring plan has been developed titled: Plan de Gestion Environnementale et Social – Mise a Jour (Novembre 2022), elaborated by Ecosphere SARL, BP: 655 Libreville; Gabon. The SEMP is reviewed regularly and the latest version dates back to November 2022.</p> <p>The plan covers different aspects (greenhouse gases and climate change, control of use of fossil fuels, etc.) including budgets for the implementation of the different activities.</p> <p>The plan includes actions to attenuate risks to biodiversity, the landscape, air pollution, groundwater, surface waters, local communities, archaeological and historical heritage, etc. Specifically, for communities the plan covers issues such as mapping of community user rights/zones, identification of impact villages and definition of modes of consultation and negotiations; maintenance of farm-to-market roads; support agricultural cooperatives; provision of improved farm inputs to local farmers (manioc, plantains, etc.); human-elephant conflicts, etc.</p>	Complied

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		<p>LOT 2 Version</p> <p>For LOT 2, a management and monitoring plan was established and is updated every 2 years. The latest update dates back to 2022 and was seen during the audit, titled: Plan de Gestion Environnementale et Social, Mise à Jour de Novembre 2022. Olam Palm gabon Mouila LOT 2. Conducted by Ecosphere.</p> <p>The plan covers actions geared at attenuating impacts to local communities, biodiversity (including HCVs), surface and ground waters, and soils. Additionally, the plan covers aspects related to hygiene and safety; non-hazardous waste, hazardous waste, noise pollution, lighting.</p> <p>For the Mill:</p> <p>OPG developed a Social and Environmental Management Plan titled: Construction d'une Huilerie et d'Une Unite de Methanisation sur le permis d'Olam Palm Mouila Lot1 : Plan de Gestion Environnementale et Sociale (PGES), dated November 2015. Conducted by Terre Environnement Amenagement.</p>	
3.4.3	<p>(C) The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way.</p> <p>- Critical (Major) compliance -</p>	<p>Lot 1:</p> <p>OPG reviews its SEMP every two years, the most recent revision was done in November of 2022 and was seen during the audit. Local communities were duly consulted during the review process as evidenced by minutes of meetings held by OPG social team and the following communities in and around Lot 1: Guidouma, Mboukou, Moutambe Sane Foumu, Guiamba, Sant-Martin, Rembo, and Doubou. The discussions during the meetings were grouped into social issues (reduction of unemployment, economic benefits</p>	Non-compliance

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	<p>from due to presence of sub-contractor workers within the village communities); environmental issues (protection of sacred sites, elephant encroachment into community members' farms). The meetings took place on the 4, 9, 11, 13, 16 and 18th November 2021.</p> <p>The social and environmental management is implemented as evidenced by annual progress reports submitted to the Ministry of Environment (Rapport de Progres Due PGES (Annee 2022) ; Olam Palm Gabon (OPG) ; Plantation de Mouila Lot 1. Dated June 2023.)</p> <p>LOT 2:</p> <p>OPG Bilala implements its SEMP as evidence by annual progress reports submitted to the Ministry of Environment titled (Lot2 : Lot2 : Rapport de Progres du PGES (Annee 2022); Olam Palm Gabon (OPG) ; Plantation de Mouila Lot II, dated June 2023.</p> <p>OPG Bilala has reviewed its social and environmental management and monitoring plan for Lot 2 and review titled: Plan de Gestion Environnementale et Social, Mise à Jour de Novembre 2022. Olam Palm gabon Mouila LOT 2 was seen during the audit.</p> <p>The minutes of meetings geared towards review of the SEMP for Lot 2 were seen during the audit. Communities consulted included: Boungounga (6/12/2021), Diangui (20/11/2021), Kanana(17/11/2023), Lambarene-Kili (18/11/2021 and Fanguidaka (18/11/2021), all with signed attendance sheets. Issues raised during the meetings included: elephant encroachment into farmlands, solar lamps installed by Olam are</p>	

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		<p>not maintained, pollution of rivers with waters from Olam nurseries, increase in mosquitoes in some villages. All these aspects have been factored into the revised SEMP dated November 2022, cited above.</p> <p>For the Mill: OPG regularly submits progress reports to the Ministry of Environment as evidenced by: Rapport de Progres du PGES (Annee 2022, i.e. for activities of 2022, reported in 2023), Olam Palm Gabon, Usine Bilala, Dated June 2023.</p> <p>However, the SEMP for the mill has neither been reviewed nor updated in a participatory way as required. Therefore, a Major Non-Compliance was raised.</p>	
Criterion 3.5: A system for managing human resources is in place.			
3.5.1	<p>Employment procedures for recruitment, selection, hiring, promotion, retirement and termination are documented and made available to the workers and their representatives.</p> <p>- Minor Compliance -</p>	<p>The company has documented procedures for that guides the recruitment of expatriates, communities and Gabonese dated 13th January 2023. The recruitment together with other conditions such as promotion, retirement and termination are captured in the workers conditions of service. These documents have been made available to the workers through their representatives. Interview with the workers representatives confirmed the document has been shared with them and it is implemented when required.</p>	Complied
3.5.2	<p>Employment procedures are implemented, and records are maintained.</p> <p>- Minor Compliance -</p>	<p>The company maintains records of all activities in line with the recruitment, terminations, promotion or retirement of workers.</p>	Complied

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		<p>Evidence of records of recruitment made during the period under review.</p> <p>On the 11th December 2023, the company made an advertisement for the recruitment of Excavator operator. The advertisement led to an application of just one person who is still going through the recruitment process.</p>	
Criterion 3.6: An occupational health and safety (H&S) plan is documented, effectively communicated and implemented.			
3.6.1	<p>(C) All operations are risk assessed to identify H&S issues. Mitigation plans and procedures are documented and implemented.</p> <p>- Critical (Major) compliance -</p>	<p>The certification unit has risk assessed all the activities in their operations which includes harvesting, nursery, chemical spraying to name a few. The assessment report is captioned "Register of the Risk Analysis About Health and Safety at Work" which was last revised on 26/12/2023 (BPOM), and 06/01/2024 (estates). The mitigation plans were developed thereafter to address all the identified risks. The report as reviewed has the following information:</p> <ul style="list-style-type: none"> • Major Activity/Area • Description of the activity • Danger • Risk Related to the danger • Risk evaluation • Level of Risk • Counter Measure • New Counter Measures <p>SOPs were developed thereafter as regulations to be implemented to minimize the identified risks.</p> <p>Ever since the last revision, the following new activities were included:</p> <ul style="list-style-type: none"> – Fertiliser application through irrigation system 	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		<ul style="list-style-type: none"> – Poisoning trees (parasolier - <i>Musanga cecropiodes</i>) – Night patrol for elephant 	
3.6.2	(C) The effectiveness of the H&S plan to address health and safety risks to people is monitored. - Critical (Major) compliance -	There is no change in term of the statement conformity when comparing from the previous audit result. Apart from daily routine supervision, among the methods to monitor the effectiveness of the H&S plan are SHO Workplace Inspection, internal audits, safety committee meetings, and annual medical surveillance. Records of monitoring were made available for verification by the sampled operating units. Over times, generally the number of accidents had been observed to be declining which indicates the H&S plan is effective.	Complied
Criterion 3.7: All staff, workers, Scheme Smallholders, out-growers, and contract workers are appropriately trained.			
3.7.1	(C) A documented programme that provides training is in place, which is accessible to all staff, workers, Scheme Smallholders and outgrowers and subcontractors, taking into account gender-specific needs, and which covers applicable aspects of the RSPO P&C, in a form they understand, and which includes assessments of training. - Critical (Major) compliance -	OPG Bilala has documented their annual training programme which covered all aspects of the RSPO elements. The training programme has the information about training subjects, target group of employees to be trained, and planned dates to be conducted. OPG Bilala had shared their <i>Procédure de gestion des demandes d'informations</i> (procedure for information request) [SOP No. 005/CRS DI (4)/0120, rev. 04, 17/01/2020]. Based on this procedure, workers can access the training programme upon request. Nonetheless, there has been no request by the workers to view the training programme so far. Thus, the accessibility of the programme to all workers can be further improved (OFI). The establishment of the training programme started with the identification of training needs (PIC: Learning and Development Assistant Manager). Various function of trainings i.e., for Plantation, Legal, Social Dept./Medical, Finance, HR, Security, Procurement, and Engineering were identified. Among the	OFI

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Criterion / Indicator		Assessment Findings						Compliance																																																	
		information available in the training programme was Functions, Training subjects, participant feedback, planned and actual dates to be, or is conducted.																																																							
3.7.2	Records of training are maintained, where appropriate on an individual basis. - Minor Compliance -	<div>Records of training were maintained by the mill and estates and made available for verification. Among the records verified are as follows:</div> <table><tr><th rowspan="2">No</th><th rowspan="2">Trainings</th><th colspan="5">Dates</th></tr><tr><th>BPOM</th><th>Estate 5</th><th>Estate 6</th><th>Estate 8</th><th>Estate 9</th></tr><tr><td>1</td><td>Plantation Management for Supervisors</td><td>NA</td><td colspan="5">13/06 & 22/08/23 – but based on attendance records – can't tell how many participants from each estate</td></tr><tr><td>2</td><td>Spraying</td><td>NA</td><td>27/02/23</td><td>11/04/23</td><td>08/06/23 (Kiliss)</td><td>29/03/23 (Lombeng)</td></tr><tr><td>3</td><td>Harvesting standard</td><td>NA</td><td>18/04/23 (Sapga)</td><td>11/4/23</td><td>08/03/23 (JFA) 14/03/23 (Sapga)</td><td>15/03/23 (Kiliss)</td></tr><tr><td>4</td><td>Driving license</td><td>NA</td><td colspan="5">26/03/2022, 30/03/2022, 02/04/2022 by ICS Academy</td></tr><tr><td>5</td><td>First aid</td><td>05/05/23 30/06/23</td><td colspan="2">26-27/8/23</td><td colspan="2">14/07/23</td></tr></table>						No	Trainings	Dates					BPOM	Estate 5	Estate 6	Estate 8	Estate 9	1	Plantation Management for Supervisors	NA	13/06 & 22/08/23 – but based on attendance records – can't tell how many participants from each estate					2	Spraying	NA	27/02/23	11/04/23	08/06/23 (Kiliss)	29/03/23 (Lombeng)	3	Harvesting standard	NA	18/04/23 (Sapga)	11/4/23	08/03/23 (JFA) 14/03/23 (Sapga)	15/03/23 (Kiliss)	4	Driving license	NA	26/03/2022, 30/03/2022, 02/04/2022 by ICS Academy					5	First aid	05/05/23 30/06/23	26-27/8/23		14/07/23		Complied
No	Trainings	Dates																																																							
		BPOM	Estate 5	Estate 6	Estate 8	Estate 9																																																			
1	Plantation Management for Supervisors	NA	13/06 & 22/08/23 – but based on attendance records – can't tell how many participants from each estate																																																						
2	Spraying	NA	27/02/23	11/04/23	08/06/23 (Kiliss)	29/03/23 (Lombeng)																																																			
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Criterion / Indicator		Assessment Findings							Compliance
		6	Working at height	29/11/23 (Eng Dept.)	NA	NA	NA	NA	
		7	Confined space	12/04/23	NA	NA	NA	NA	
		8	Electrical work	11/12/23	NA	NA	NA	NA	
		9	Fire fighting	08/03/23	NA	NA	NA	NA	
		10	PPE wearing	21/03/23	NA	NA	NA	NA	
		11	LTA declaration	29/09/23	NA	NA	NA	NA	
		12	Safety instruction	27/09/23	NA	NA	NA	NA	
		13	Chemical using	30/11/23	NA	NA	NA	NA	
		14	Material handling	13/12/23	NA	NA	NA	NA	
		15	Emergency response	15/12/23	NA	NA	NA	NA	
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.	The last training on SCCS was conducted on in a few sessions, i.e.: – 14/03/2023 for mass balance accounting recorder – 22/03/2023 for weighbridge operators							Complied

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	- Minor Compliance -	— 08/08/2023 for manager and assistant managers	
Criterion 3.8: Supply chain requirement for mills (note: All supply chain requirements are considered as Critical (C) . However it will not contribute to suspension if there is more than 5 non-compliance within a principle)			
3.8.1	Identity Preserved Module A mill is deemed to be Identity Preserved (IP) if the FFB processed by the mill are sourced from plantations/estates that are certified against the RSPO Principles and Criteria (RSPO P&C), or against the Group Certification scheme. Certification for CPO mills is necessary to verify the volumes and sources of certified FFB entering the mill, the implementation of any processing controls (for example, if physical separation is used), and volume sales of RSPO certified products. If a mill process certified and uncertified FFB without physically separating them, then only Mass Balance Module is applicable.	The mill is deemed to be Identity Preserved module since it only receives RSPO certified FFB from any sources. There has been no non-certified FFB received since the last assessment.	Complied
3.8.2	Mass Balance Module A mill is deemed to be Mass Balance (MB) if the mill process FFB from both RSPO certified and uncertified plantations/estates. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own and 3rd party certified supply base. In that scenario, the mill can claim only the volume of oil palm products produced from processing of the certified FFB as MB.	NA as the mill opted for IP	Not Applicable
3.8.3	The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill shall be recorded by the certification body (CB) in the public summary of the P&C certification report. This figure represents the total volume of certified oil palm product (CPO and PK) that the certified mill is allowed to deliver in a year. The actual tonnage	The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill is recorded in this public summary report. The actual tonnage produced from last audit date (Nov 2022– Oct 2022) is reported in the summary in Table 10.	Complied

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	produced shall then be recorded in each subsequent annual surveillance report.		
3.8.4	The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO IT platform.	<p>The registration of PalmTrace will be carried out by the Global Trade Marketing Department, HQ. All transaction will be registered in the PalmTrace. Company has registered their mill in the PalmTrace:</p> <p>Members ID: RSPO_PO1000006576</p> <p>Licence validity: 07/06/2023 to 27/03/2024</p> <p>Member category: Oil Mill</p> <p>Details of palm trace transactions are summarized in Table 11A</p>	Complied
3.8.5	<p>Documented procedures</p> <p>The mill shall have written procedures and/or work instructions or equivalent to ensure the implementation of all elements of the applicable supply chain model specified. This shall include at minimum the following:</p> <ul style="list-style-type: none"> a) Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements. b) Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records). c) Identification of the role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the mill's procedures for the implementation of this standard. d) The mill shall have documented procedures for receiving and processing certified and non-certified FFBs including ensuring no contamination in the IP mill. 	<p>Olam has developed a supply chain procedure entitled Supply Chain & Traceability (Identity Preserved and Segregated Model) (Doc. No.: OPG_SC-SOP/IP-SG (02)/0823, ver. 2, dated 01/08/2023).</p> <p>The procedure covers the subjects on responsibility, reporting of certified CPO/PK, non-conforming products and/ or documents, FFB delivery Plantation to Mill, CPO/PK delivery Mill to customer, record keeping, training, complaints, management review and product claim.</p> <p>The mill has conducted SCCS SOP & Policy training to the critical control point personnel such as weighbridge operator, auxiliary police, drivers, clerks, and QA supervisor. Details of training are described in Indicator 3.7.1.</p> <p>The Mill Manager as Head of Operating Unit have the overall responsibility for the implementation of SOP, and he may delegate his responsibility to relevant personnel or invite personnel from</p>	Complied

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		<p>various departments if necessary to assist in the implementation of the SOP.</p> <p>As addressed in the supply chain procedure, the mill will only receive and process the certified FFB. No non-certified FFB shall be taken.</p>	
3.8.6	<p>Internal Audit</p> <p>i) The mill shall have a written procedure to conduct annual internal audit to determine whether the mill:</p> <p>a. Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.</p> <p>b. Effectively implements and maintains the standard requirements within its organisation.</p> <p>ii) Any non-conformities found as part of the internal audit shall be issued corrective action. The outcomes of the internal audits and all actions taken to correct non-conformities shall be subject to management review at least annually. The mill shall maintain the internal audit records and reports.</p>	<p>The mill has last conducted the internal audit on 11/07/2023 in accordance with the internal audit procedure which is addressed in the Supply Chain & Traceability (Identity Preserved and Segregated Model) (Doc. No.: OPG_SC-SOP/IP-SG (02)/0823, ver. 2, dated 01/08/2023) under 6.9: Internal Audit. The internal audit has also covered the RSPO Market Communications and Claims elements.</p> <p>There was one non-conformity report raised from the internal audit. The handling of non-conformity is defined under Clause 7.5 of the facility's Internal Audit (SOP No. 10/SD AI(06)/0823, rev. 6, dated 14/08/2023). The NC was about no SCC training has been given to the new mill manager (joined in April 2023) even though he is the person appointed to have the overall responsibility of the implementation of the SCC standard. The NC was closed by the internal auditor on 08/08/2023. Evidence of correction and corrective action were found to be adequate.</p>	Complied
3.8.7	<p>Purchasing and Goods In</p> <p>i) The mill shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBs received.</p> <p>ii) The mill shall inform the CB immediately if there is a projected overproduction of certified tonnage.</p> <p>iii) The mill shall have a mechanism in place for handling non-conforming FFB and/or documents.</p>	<p>The mill has only been receiving the certified FFB from its own supply base i.e. Mouila Lot 1, Mouila Lot 2 and Mouila Lot 3 since the last assessment. There has been no FFB from any third party. Receiving FFB is guided by the Supply Chain and Traceability procedure. Each trip of FFB sent to the mill using FFB truck is accompanied with FFB Dispatch chit which has the information</p>	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		<p>about field no., estate name, truck registration no., RSPO certificate no., number of bunches, and weights (gross & nett).</p> <p>The management will inform CB should there are any overproduction of certified tonnage. Nonetheless, based on the mass balance sheet and production report, there has been no overproduction recorded.</p> <p>The mechanism for handling non-conforming FFB and/or documents is addressed in the procedure clause 6.1.</p>	
3.8.8	<p>Sales and Goods Out</p> <p>The supplying mill shall ensure that the following minimum information for RSPO certified products is made available in document form. The information shall be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation):</p> <ul style="list-style-type: none"> a) The name and address of the buyer; b) The name and address of the seller; c) The loading or shipment / delivery date; d) The date on which the documents were issued; e) RSPO certificate number; f) A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations); g) The quantity of the products delivered; h) Any related transport documentation; i) A unique identification number. 	<p>For CPO sales, all the required information of this indicator in various documents such as dispatch tickets, commercial invoice, bill of lading, and sales contracts, to name a few.</p> <p>With regards to PK transaction, the mill is integrated with Mouila Bilala Kernel Crushing Plant. Certified palm kernel is directly transferred to the KCP via conveyor. Verification of the Mass Balance Calculation Sheet format for the period under review, showed that the movement of certified material and products was correctly recorded.</p>	Complied

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3.8.9	<p>Outsourcing Activities</p> <p>i) The mill shall not outsource its milling activities. In cases where he mill outsources activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the mill holding the certificate shall ensure that the independent third party complies with relevant requirements of this RSPO Supply Chain Certification</p> <p>ii) The mill shall ensure the following:</p> <p>a) The mill has legal ownership of all input material to be included in outsourced processes</p> <p>b) The mill has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The onus is on the mill to ensure that certification body (CB) has access to the outsourcing contractor or operation if an audit is deemed necessary.</p> <p>c) The mill has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.</p> <p>d) The mill shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to their respective operations, systems, and all information, when this is announced in advance.</p>	<p>The mill does not outsource any of its milling activities to any third party. The mill outsources its CPO transportation and storage in New Owendo International port to OPG subsidiary logistic company, Gabon Special Economic Zone (GSEZ). Contract addendum between OPG and GSEZ dated of 30/05/2022 on the provision on logistic services was made available for verification. RSPO supply chain compliance declaration is stated in the addendum which signed on 30/04/2020 by GSEZ representative. Although there is no outsource activity for processing, by this enforceable contract agreement and addendum, the mill has the assurance mechanism that the requirements of this Indicator #ii) a) to d) are somehow met by the logistic contractor.</p>	Complied
3.8.10	<p>The mill shall record the names and contact details of all contractors used for the physical handling of RSPO certified oil palm products.</p>	<p>The mill keeps the names and contact details of person in-charge of GSEZ. This is verifiable through email correspondence between OPG and GSEZ</p>	Complied

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3.8.11	The mill shall inform its CB in advance prior to conduct of its next audit of the names and contact details of any new contractor used for the physical handling of RSPO certified oil palm products.	Addressed in Supply Chain & Traceability (Identity Preserved and Segregated Model) (Doc. No.: OPG_SC-SOP/IP-SG (02)/0823, ver. 2, dated 01/08/2023) where OPG is to update all outsourced contractor(s) i.e., name and contact details at least once a year in the stakeholder list. Since there is only one contractor (i.e., GSEZ) having a list of stakeholders is not necessary. Nonetheless, GSEZ is registered in their SAP system.	Complied
3.8.12	<p>Record keeping</p> <ul style="list-style-type: none"> i) The mill shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of this RSPO Supply Chain Certification Standard requirements. ii) Retention times for all records and reports shall be a minimum of two (2) years and shall comply with relevant legal and regulatory requirements and be able to confirm the certified status of raw materials or products held in stock. iii) For Identity Preserved Module, the mill shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis. iv) For Mass Balance Module, the mill: <ul style="list-style-type: none"> a) Shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis and / or three-monthly basis. b) All volumes of certified CPO and PK that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO. c) The mill can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three 	<ul style="list-style-type: none"> i) All the sampled records related to the movements of RSPO certified materials and products were found to be accurate, complete, up-to-date, and accessible. ii) The retention period for maintaining the traceability records is 5 years as stated in the clause 8 of the Supply Chain & Traceability (Mass Balance Model) procedure. iii) The receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK were recorded on a real-time basis in the computerised SAP system. iv) NA as the mill is using IP model 	Complied

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	(3) months. However, a mill is allowed to sell short (i.e. product can be sold before it is in stock.		
3.8.13	<p>Extraction Rate</p> <p>The oil extraction rate (OER) and the kernel extraction rate (KER) shall be applied to provide a reliable estimate of the amount of certified CPO and PK from the associated inputs. Mill shall determine and set their own extraction rates based upon past experience, documented and applied it consistently.</p>	Conversion factor of CPO and PK production is depending on the actual OER and KER. Nonetheless, in forecasting the future productions, the OER and KER are estimated based on experience and performance. It was verified that the estimated OER and KER mentioned in Table 10 are in line with the mill's previous performance.	Complied
3.8.14	Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate.	The facility is using the actual extraction rate and therefore updating of rates is not necessary. Nonetheless, in forecasting the future productions, the OER and KER are estimated based on experience and performance. It was verified that the estimated OER and KER mentioned in Table 10 are in line with the mill's previous performance.	Complied
3.8.15	<p>Processing</p> <p>For Identity Preserved Module, the mill shall assure and verify through documented procedures and record keeping that the RSPO certified oil palm product is kept separated from non-certified oil palm products, including during transport and storage to strive for 100% separation.</p>	The mill does not accept non-certified FFB anymore. Thus, separation is not necessary. This is also addressed in the SC procedure mentioned in Indicator 3.8.5.	Complied
3.8.16	<p>Registration of Transactions</p> <p>i) Shipping Announcement in the RSPO IT platform shall be carried out by the mills when RSPO certified products are sold as certified to refineries, crushers, and traders not more than three months after dispatch with the dispatch date being the Bill of Lading or the dispatch documentation date.</p>	<p>i) The registration of PalmTrace is carried out by the General Manager of Sustainability in Head Office. All transaction will be registered in the PalmTrace. Among the transactions verified were as follows:</p> <ul style="list-style-type: none"> - CSPK: transaction ID TR-78ce89ce-e8b7, dated 08/01/2023 	Complied

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	ii) Remove: RSPO certified volumes sold under different scheme or as conventional, or in case of underproduction, loss or damage shall be removed in the RSPO IT platform.	<ul style="list-style-type: none"> - CSPO: transaction ID TR-008c532a-9386, dated 20/12/2023 <p>RSPO certified volumes sold as conventional were removed in the RSPO PalmTrace and from its stock in the mass balance accounting sheet. This can be seen in the PalmTrace transaction records under ID reference no. ST-TR-653c2249-6115 and ST-TR-d33cc4d9-bbd6.</p>	
3.8.17	<p>Claims</p> <p>The mill shall only make claims regarding the production of RSPO certified oil that are in compliance with the RSPO Rules on Market Communications and Claims.</p>	Should there be any claims regarding the production of RSPO certified oil to be made, the facility will comply with the RSPO Rules on Market Communications and Claims. This is also addressed in the company's Supply Chain & Traceability (Identity Preserved and Segregated Model) (Doc. No.: OPG_SC-SOP/IP-SG (02)/0823, ver. 2, dated 01/08/2023).	Complied
General corporate communications			
4.1	A corporate communication is one made by any RSPO member that highlights its RSPO membership and/or its commitment to the objectives and principles of RSPO. Corporate communication is a "non-product related" claim.	Corporate communication is made at the parent company Olam Palm Gabon SA level i.e., the RSPO member. The company's statement of supporting the RSPO can be seen at its official website https://www.olamgroup.com/our-businesses/remaining-olam-group/olam-palm-gabon/sustainable-palm-oil.html	Complied
4.2	<p>In corporate communications, a member is allowed to:</p> <ul style="list-style-type: none"> A. display its RSPO membership status B. display the RSPO web address (www.rspo.org) C. state that the member supports the work of RSPO D. state the member's history with regard to RSPO E. use the RSPO Trademark (as shown below) with a valid trademark licence number to promote its RSPO membership 	Based on verification of the OPG's website, there was no breach of the general corporate communications requirements and OPG does not use the RSPO trademark.	Complied

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4.3	Members are not allowed to use the RSPO corporate logo as shown below. This is for the sole use of the RSPO Secretariat.	No evidence of RSPO corporate logo used by the mill and this was verified through document and site review (notice board, business card, shipping documentation, etc.).	Complied
4.4	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 palm oil products.	There was no statement made by OPG that may lead consumers to believe that RSPO membership by itself implies the selling of RSPO-certified oil palm products.	Complied
4.5	<p>Additionally, RSPO certified members are allowed to make statements that highlight their RSPO certification status and product-related claims in their corporate communication tools. Some permitted examples include:</p> <ul style="list-style-type: none"> • "We have been sourcing RSPO certified palm oil since (YEAR)." • "We have used (X) tonnes of RSPO certified palm oil for our products manufactured in the last year." • "We have been RSPO certified since (YEAR)." • "We have (X NUMBER OF PRODUCTS) produced using RSPO certified MB/SG palm oil." • "In (YEAR), our company sourced (X%) of palm oil derivative volumes that was used across our products manufactured as MB certified." • "Our company covered (X%) of palm oil derivative volumes used across all our products manufactured in (YEAR) with smallholder credits." • "We are RSPO certified. Ask us for our RSPO certified products." 	There were no statements that highlight the company's RSPO certification status and product-related claims in their corporate communication tools.	Complied
4.6	<p>RSPO non-certified members are allowed to make product-related claims in their corporate communication tools by doing the following:</p> <p>A. Use the RSPO Trademark with a valid trademark licence number to promote its membership of RSPO. It is sufficient for non-certified members to indicate this only once in their communication.</p> <p>B. Claim statements are limited to the following examples:</p>	NA as Olam Group Limited is an RSPO member.	Not Applicable

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	<p>i. "The rate of RSPO-certified palm oil procurement was (X%). We aim to achieve (X%) sustainable procurement by fiscal year (YEAR)."</p> <p>ii. X% of palm oil sourced by our organisation are certified through the Roundtable on Sustainable Palm Oil (RSPO) supply chains as (a) Identity Preserved, (b) Segregated, (c) Mass Balance, or (d) Book and Claim.</p> <p>C. In cases wherein an organisation/member would like to indicate their commitment to sourcing RSPO certified volumes, the statement shall be accompanied with a disclaimer: "This reported figure is not audited through RSPO Certification".</p>		
Product-specific communications			
5.1 General			
5.1.1	Product-specific communications refer to any public statement about an individual product that contains RSPO certified sustainable palm oil. These product-specific communications can be made on pack and/or off pack such as shipping documents, advertisements, flyers, brochures, posters, displays, newsletters, websites, emails, letters, offerings, invoices, (annual) reports, or media interviews.	NA as no product-specific communication made by the mill.	Not Applicable
5.1.2	Product-specific communications are voluntary.	NA as no product-specific communication made by the mill.	Not Applicable
5.1.3	Wherever the RSPO Label is displayed for product-specific communications, the applicable trademark licence number must be shown immediately under or next to the RSPO Label or the statement itself.	NA as no product-specific communication made by the mill.	Not Applicable
5.1.4	Use of any other trademark or label to highlight the presence of RSPO certified sustainable palm oil products is an unauthorised product-specific communication.	NA as no product-specific communication made by the mill.	Not Applicable

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5.1.5	<p>If any organisation, which does not further modify end products or does not need to undergo Supply Chain Certification such as retailers, traders or distributors, enters into any agreement whereby the RSPO certified supplier labels products with the retailers/traders/distributors RSPO Trademark licence number, the following conditions shall be met as shown below</p> <ul style="list-style-type: none"> • RSPO members should be registered on the RSPO IT Platform and complete the information under 'description of products' field. • Both parties shall inform their certification body in writing about the agreement. • The RSPO certified supplier is responsible for ensuring that the buyer's RSPO Trademark licence number is used only on products that are supplied to that buyer. 	NA as no product-specific communication made by the mill.	Not Applicable
5.1.6	<p>Organisations that do not further modify end products or that do not need to undergo Supply Chain Certification such as retailers, traders, or distributors who intend to use the RSPO Label with their own RSPO Trademark licence number in any of their product-specific communications, can do so by undergoing a remote audit. A remote audit shall be conducted by an RSPO-accredited certification body (CB) prior to the use of the RSPO Label whereby the organisation will need to demonstrate that the use is in compliance with the rules contained within this document and that the claim itself can be supported through a certified supply chain</p>	NA as no product-specific communication made by the mill.	Not Applicable
5.2 Off pack claims			
5.2.1	<p>Off pack claims are product-specific communications regarding the certified sustainable palm oil contained within the product(s) made on any communication materials such as shipping documents, advertisements, flyers, brochures, posters, displays, newsletters, websites, emails, letters,</p>	NA as no off-pack claims made by the mill.	Not Applicable

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	offerings, invoices, (annual) reports, or media interviews. The RSPO Label should be used together with the valid trademark licence number wherever an off pack claim is made.		
5.2.2	When confirming the sale of certified palm oil products, members must adhere to the requirements of the RSPO SCCS. This includes stating the supply chain model and certificate number under which the claim is being made.	NA as no off-pack claims made by the mill	Not Applicable
5.2.3	<p>Where a distributor or wholesaler takes title to products containing certified sustainable palm oil products, the requirements of the RSPO SCCS can follow either one of these two options:</p> <ul style="list-style-type: none"> • If the distributor or wholesaler holds only a distributor licence, it may only communicate RSPO certified palm oil 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 products have been made on behalf of the distributor or wholesaler, with specific evidence either through on pack claims or documentation. • If the distributor or wholesaler is supply chain certified, they should follow the requirements outlined in section 5.2.2. 	NA as no off-pack claims made by the mill	Not Applicable
5.3 On pack claims			
5.3.1	Only RSPO members who have supply chain certification and members who have undergone remote audit as per 5.1.6 are allowed to make on pack claims about the certified sustainable palm oil contained within the product(s) as per Module A, B, C and E. RSPO members who have purchased RSPO Credits are entitled to claim their support for the production of certified sustainable palm oil as per Module D.	NA as no on pack claims made by the mill.	Not Applicable

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5.3.2	<p>In case of limited space, RSPO allows flexibility to use a one-line arrangement claim together with a valid trademark licence number for on pack communications as below without having to use any RSPO Label. The licence number has to measure at least 4pt (1.4mm) in size and the font must be Calibri. The following options shall be considered:</p> <p>A) For Identity Preserved (IP)/ Segregated (SG) Certified Products:</p> <ul style="list-style-type: none"> • RSPO IP/SG CERTIFIED* • Contains RSPO IP/SG palm oil* • Contains RSPO certified palm oil (IP/SG)* <p>*Add RSPO TM Licence Number below or next to the claim.</p>	NA as no on pack claims made by the mill.	Not Applicable
	<p>B) or Mass Balance (MB) Certified Products:</p> <ul style="list-style-type: none"> • RSPO MIXED* • Contributes to the production of RSPO certified palm oil* • Contains RSPO certified palm oil (MB)* <p>*Add RSPO TM Licence Number below or next to the claim.</p>	NA as no on pack claims made by the mill.	Not Applicable
	<p>C) For Partially Certified Products:</p> <ul style="list-style-type: none"> • RSPO 50% MIXED* • Contains at least 50% RSPO certified palm oil* <p>*Add RSPO TM Licence Number below or next to the claim.</p>	NA as no on pack claims made by the mill.	Not Applicable
	<p>D) For Products covered with Book and Claim (B&C):</p> <ul style="list-style-type: none"> • RSPO CREDITS* • Supports the production of RSPO certified palm oil* • Contains palm oil covered by the purchase of RSPO Credits* <p>*Add RSPO TM Licence Number below or next to the claim.</p>	NA as no on pack claims made by the mill.	Not Applicable
5.3.3	On pack claims shall not include information about the claimant's RSPO membership status.	NA as no on pack claims made by the mill.	Not Applicable

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5.3.4	Members shall not communicate to consumers information about their suppliers' RSPO membership status.	NA as no on pack claims made by the mill.	Not Applicable
5.3.5	Use of the RSPO Label is restricted to claims about RSPO certified sustainable palm oil contained in products and is not authorised for use in relation to any other ingredient.	NA as no on pack claims made by the mill.	Not Applicable
5.3.6	All members making on pack claims are encouraged to submit the information and images of their end products that carry the RSPO Label via the MyRSPO portal.	NA as no on pack claims made by the mill.	Not Applicable
MODULE A – IDENTITY PRESERVED			
	95% of the palm oil content must be RSPO IP certified.	The CPO and PK produced content 100% of IP certified palm oil as the mill does not receive non-certified FFB.	Complied
	If 100% of RSPO IP certified palm oil content cannot be sourced, a maximum of 5% volume from other non-certified sources is allowed and the reason for this must be fully justified. The volume of the non-certified palm oil content shall be covered by the purchase of RSPO Credits of equivalent volume.	NA as 100% of RSPO IP certified palm oil can be sourced.	Not Applicable
Messaging			
	<p>Messaging ALLOWED for storytelling in product-specific communications may include any of the following elements:</p> <ul style="list-style-type: none"> The palm oil products contained in this product have been certified to come from RSPO sources. www.rspo.org By choosing this product, you are sure that it contains RSPO certified palm oil. For more information: www.rspo.org RSPO certified sustainable palm oil products were kept apart from other palm oil products throughout the supply chain. www.rspo.org 	No storytelling on and off product-related communications made by the mill.	Not Applicable

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	<ul style="list-style-type: none"> Certified sustainable palm oil products can be traced back to RSPO certified mills and plantations. www.rspo.org The entire supply chain is monitored by independent, RSPO-accredited auditors. www.rspo.org RSPO certified sustainable palm oil has been produced according to stringent environmental and social criteria. www.rspo.org 		
Product-Specific Communications Labelling			
	<p>Members are allowed to use the RSPO Label in one of the following ways:</p> <ul style="list-style-type: none"> RSPO Trademark that includes the tag "CERTIFIED"; or RSPO Trademark that includes the tag "This product contains certified sustainable palm oil". 	NA as no RSPO Label is used by the mill.	Not Applicable
MODULE B – MASS BALANCE SPECIFIC RULES			
Mass Balance palm oil content			
	95% of the palm oil content must be RSPO MB-certified.	NA as the mill opted for IP.	Not Applicable
	If 100% of RSPO MB certified palm oil content cannot be sourced, a maximum of 5% volume from other non-certified sources is allowed and the reason for this must be fully justified. The volume of the non-certified palm oil content shall be covered by the purchase of RSPO Credits of equivalent volume.	NA as the mill opted for IP.	Not Applicable
Messaging			
	<p>Messaging ALLOWED in storytelling in product-specific communications includes:</p> <ul style="list-style-type: none"> [Palm oil products]/[palm oil]/[palm kernel oil] from RSPO certified mills and plantations were mixed with non-certified palm oil products in the supply chain. 	NA as the mill opted for IP.	Not Applicable

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	<ul style="list-style-type: none"> The volume of [palm oil 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. 		
Product-Specific Communications Labelling			
	<p>Members are allowed to use the RSPO Label in one of the following ways:</p> <ul style="list-style-type: none"> The RSPO Label MUST contain the tag "MIXED". The tag "MIXED" designates palm oil products sourced under the Mass Balance (MB) supply chain system, which administratively balances inputs and outputs of certain palm oil volumes. The tag "MIXED" on a product does not guarantee that the product itself contains the certified material; some or all of it may reside in a product that does not carry a claim. The RSPO Label can also include the statement: "[The palm oil contained in this product] contributes to the production of certified sustainable palm oil". 	NA as the mill opted for IP.	Not Applicable
Principle 4: Respect community and human rights and deliver benefits			
Criterion 4.1: The unit of Certification respects human rights, which includes respecting the rights of Human Rights Defenders.			
4.1.1	<p>(C) A policy to respect human rights, including prohibiting retaliation against Human Rights Defenders (HRDs), is documented and communicated to all levels of the workforce, operations, supply chain and local communities and prohibits intimidation, corruption and harassment by the unit of certification and contracted services, including contracted security forces.</p> <p>- Critical (Major) compliance -</p>	The company has a documented human rights policy captioned Politique de respect des droits Humains dated 01/09/2019. The policy makes provision for prohibiting retaliation against human rights defenders (HRDs). Interview with community representatives and the workers representatives during this audit period did not establish human abuses in the operations of the company.	Complied
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.	Interview with the chiefs and representatives from Kanana, Diangui, Mandji, Guidouma, Rembo, Mboukou villages all indicated the	Complied

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	- Minor compliance -	company does not use any form of harassment including the use of any security against them	
Criterion 4.2: There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all affected parties			
4.2.1	<p>(C) The mutually agreed system, open to all affected parties, resolves disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants, HRDs, community spokespersons and whistleblowers, where requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRDs.</p> <p>- Critical (Major) compliance -</p>	<p>The company has a documented procedure for handling grievance captioned Procedure de Gestion des Plaintes est Reclamations referenced SOP N O07/SD-GP (10)/0323 and revised on the 15/03/2023. The document has been revised to update the numbers of the company contact persons responsible for receiving and handling grievances.</p> <p>The documented procedure outlines the process for addressing both internal and external grievances. The procedure provides timelines of a maximum of one month for addressing grievances received. The procedure also states that the complainant can request for anonymity when filing a complaint.</p> <p>Bilala POM maintains a file for all complaints received and also records all actions and progress made towards resolving the complaint received is recorded in a logbook. The logbook was made available for review and there were no records of complaints for the year under the audit.</p> <p>Interview with the human resource team indicates there has not been any grievance made either by the communities or workers since the last audit. This was also confirmed by the communities during the audit interviews.</p>	Complied
4.2.2	<p>Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties.</p> <p>- Minor compliance -</p>	Interview with the chiefs and other representatives from Kanana, Diangui, Mandji, Guidouma, Rembo and Mboukou communities during the audit interview indicates they hold meetings with the company every quarter and also at the end of every year. During such meetings, the company explains all their policies and other	Complied

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		documents including the grievance procedure to their understanding. They were able to demonstrate knowledge on how to raise a grievance although they indicated that none of the communities has raised a grievance since the last audit.	
4.2.3	The unit of certification keeps parties affected by a grievance informed of its progress, including against agreed timeframe and the outcome is available and communicated to relevant stakeholders. - Minor compliance -	The procedure review indicates the company will keep communities informed at all times of the outcomes of the complains either in writing, verbal or by SMS which ever is applicable.	Complied
4.2.4	The conflict resolution mechanism includes the option of access to independent legal and technical advice, the ability for complainants to choose individuals or groups to support them and/or act as observers, as well as the option of a third-party mediator. - Minor compliance -	The procedure makes provisions for the complainant to choose a legal representative, any person or institution of their choice to assist them.	Complied
Criterion 4.3: The unit of Certification contributes to local sustainable development as agreed by local communities.			
4.3.1	Contributions to community development that are based on the results of consultation with local communities are realised and documented. - Minor compliance -	The company has a negotiated agreement with all communities in both Lot 1 and Lot 2. The agreement captioned Contract Social (Social Contract) is referenced 006-OPG and dated 25/07/2014 for Lot 2 and for Lot 1, it is captioned Contract Social entre la societe Olam Palm Mouila et le populations riveraines de son Lot 1 dated 30/07/2012. Both agreements have the signatures of the government representatives Olam representatives and Community chiefs. The contract list all the six communities in Lot 2 and nine communities in Lot 1 and the various projects to be carried out for the communities. Interview with the communities indicates the	Complied

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		<p>determination of the projects were based on the request of the different communities during the FPIC engagements.</p> <p>Based on the agreement the company has developed an action plan towards the implementation of the project activities. Every year, the company meets with the community representatives to review the progress of implementation of the agreements. The audit team reviewed records of meetings and the attendance list on the meeting for last year. The meeting record is captioned Rapport d'actualisation du contract social et validation du Chronogramme de Realisation des Projects Sociaux des Villages dated 4/10/2023. A review of the previous report and compared with the current shows only one activity was pending hence moved to the current plan. Interview with the communities all confirmed the company was working according to the plan.</p>	
Criterion 4.4: Use of the land for oil palm does not diminish the legal, customary or user rights of other users without their free, prior and informed consent.			
4.4.1	<p>(C) Documents showing legal ownership or lease, or authorised use of customary land authorised by customary landowners through a Free, Prior and Informed (FPIC) process. Documents related to the history of land tenure and the actual legal or customary use of the land are available.</p> <p>- Critical (Major) compliance -</p>	<p>The right to legal use of land for Olam Palm Gabon was the result of an agreement between the government of Gabon and the company. Documents showing legal rights to the use of land by the company was made available to the audit team. The documents as reviewed shows right to land use was issued by a Decree for</p> <ul style="list-style-type: none"> A. Lot 1, granting the Company OLAM PALM, an Associated forestry permit (P.F.A) N ° 74/11 covering an area of 35,354 hectares for the implementation of the oil palm plantations in 11/09/2011. B. Lot 2: granting the Company OLAM PALM, an Associated forestry permit (P.F.A) N ° 74/12 covering an area of 31,800 	Complied

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		<p>hectares for the implementation of the oil palm plantations in 20/01/2012.</p> <p>Interview with the communities during the audit interview confirmed land for Olam operations are state land and were legally acquired from the state. They further stated that the company during the FPIC engagements explained and got their consent on the use of the land for the oil palm plantations.</p>	
4.4.2	Copies of documents evidencing agreement-making processes and negotiated agreements detailing the FPIC process are available and include:	<p>Review of land documents and interview with the Kanana, Diangui, Mandji, Guidouma, Rembo and Mboukou communities confirmed the land for Olam Palm Gabon-Bilala POM was acquired following negotiations with the state.</p> <p>However, the company also met with communities as part of the FPIC process to seek their consent prior to the establishment of the oil palm plantations. Following the FPIC engagement, two social contracts were signed between the company and the communities with the government as a witness. Interview with the communities confirmed they signed the social agreement and gave their consent prior to the establishment of the plantation.</p>	Complied
4.4.2a	<p>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>- Minor compliance -</p>	<p>Following the conclusion of the social agreement with all the communities, the company in consultations with the communities developed an action plan for the implementation of the agreed projects in the social contract.</p> <p>Based on the agreement the company has developed an action plan towards the implementation of the project activities. The action plan is captioned Chronogramme de Realisation des Projets Sociaux des Villages and is dated 04/10/2023. Interview with the communities indicates they were involved in the development of the plan</p>	Complied

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4.4.2b	Evidence that the unit of certification has respected communities' decisions to give or withhold their consent to the operation at the time that these decisions were taken. - Minor compliance -	The company met with communities as part of the FPIC process to seek their consent prior to the establishment of the oil palm plantations. Following the FPIC engagement, two social contracts were signed between the company and the communities with the government as a witness. Interview with the communities confirmed they signed the social agreement and gave their consent prior to the establishment of the plantation.	Complied
4.4.2c	Evidence that the legal, economic, environmental and social implications of permitting operations on their land have been understood and accepted by affected communities, including the implications for the legal status of their land at the expiry of the unit of certification's title, concession or lease on the land. - Minor compliance -	Land for Olam industrial plantations was a result of agreement between the state and the company. There was no land contribution from any of the communities in Lot 1 and Lot 2. Interview with community representatives during the audit period indicates they were involved in all environmental and social assessment that were conducted prior to the implementation of the project. The outcomes were fully explained to their understanding and they gave their consent to the plantation establishment by Olam.	Complied
4.4.3	(C) Maps of an appropriate scale showing the extent of recognised legal, customary or user rights are developed through participatory mapping involving affected parties (including neighbouring communities where applicable, and relevant authorities). - Critical (Major) compliance -	The company has maps showing their legal rights to the use of the land for industrial plantations. The map captioned Mouila Lot 2 Oil Palm Plantation covers a total of 31,800 Ha. The additional map captioned Mouila Lot 1 Oil Palm Plantation covers a total of 35,355 Ha. Interview with the community representatives in Lot 1 and Lot 2 confirmed their participation in the mapping.	Complied
4.4.4	All relevant information is available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements. - Minor compliance -	All information of the company is written in French which is the official spoken and written language in Gabon. Although there are local languages in the communities, the company uses French in explaining all their information to the communities because its commonly spoken among the natives	Complied

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4.4.5	(C) Evidence is available to show that communities are represented through institutions or representatives of their own choosing, including by legal counsel if they so choose. - Critical (Major) compliance -	Communities during the consultations all indicated that they are represented by their traditional leaders who speaks and takes decisions on the communities' behalf. The leaders in consultations with the communities can also appoint some people such as women representatives and youth leaders to represent the communities on some specific issues. The companies also maintain a list of all such leaders with their contacts in their stakeholder list.	Complied
4.4.6	There is evidence that implementation of agreements negotiated through FPIC is annually reviewed in consultation with affected parties. - Minor compliance -	The company update its action plan for the implementation of the negotiated agreements. Reviewed the updated Chronogramme de Realisation des Projects Sociaux des Villages for Lot 1 and Lot 2 dated 4/10/2023. These reviews were done in consultations with the representatives of all the communities represented by their elders. The audit team reviewed signed copies of the revised action plan.	Complied
Criterion 4.5: No new plantings are established on local peoples' land where it can be demonstrated that there are legal, customary or user rights, without their FPIC. This is dealt with through a documented system that enables these and other stakeholders to express their views through their own representative institutions.			
4.5.1	(C) Documents showing identification and assessment of demonstrable legal, customary and user rights are available. - Critical (Major) compliance -	Not Applicable (N/A) The company has not acquired new land for plantings as of the time of this audit.	Not Applicable
4.5.2	(C) FPIC is obtained for all oil palm development through a comprehensive process, including in particular, full respect for their legal and customary rights to the territories, lands and resources via local communities' own representative institutions, with all the relevant information and documents made available, with option of resourced access to independent advice through a documented, long-term and two-way process of consultation and negotiation. - Critical (Major) compliance -	Not Applicable (N/A) The company has not acquired new land for plantings as of the time of this audit.	Not Applicable

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4.5.3	<p>Evidence is available that affected local peoples understand they have the right to say 'no' to operations planned on their lands before and during initial discussions, during the stage of information gathering and associated consultations, during negotiations, and up until an agreement with the unit of certification is signed and ratified by these local peoples. Agreements have to be negotiated and entered into voluntarily prior to new operations and without coercion.</p> <p>- Minor compliance -</p>	Not Applicable (N/A) The company has not acquired new land for plantings as of the time of this audit.	Not Applicable
4.5.4	<p>To ensure local food and water security, as part of the FPIC process, participatory SEIA and participatory land-use planning with local peoples, the full range of food and water provisioning options are considered. There is transparency of the land allocation process.</p> <p>- Minor compliance -</p>	Not Applicable (N/A) The company has not acquired new land for plantings as of the time of this audit.	Not Applicable
4.5.5	<p>Evidence is available that the affected communities and rights holders have had the option to access information and advice, that is independent of the project proponent, concerning the legal, economic, environmental and social implications of the proposed operations on their lands.</p> <p>- Minor compliance -</p>	Not Applicable (N/A) The company has not acquired new land for plantings as of the time of this audit.	Not Applicable
4.5.6	<p>Evidence is available that the communities (or their representatives) gave consent to the initial planning phases of the operations prior to the issuance of a new concession or land title to the operator.</p> <p><u>PROCEDURAL NOTE:</u></p> <p>In Gabon, it is the State which grants the concessions. The operator will then identify the areas of activity with the populations and obtain consent for the implementation of the project.</p> <p>- Minor compliance -</p>	Not Applicable (N/A) The company has not acquired new land for plantings as of the time of this audit.	Not Applicable

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4.5.7	<p>New lands will not be acquired for plantations and mills after 15 November 2018 as a result of recent (2005 or later) expropriations in the national interest without consent (eminent domain), except in cases of smallholders benefitting from agrarian reform or anti-drug programmes.</p> <p>PROCEDURAL NOTE:</p> <p>In Gabon, it is the State which grants the concessions. The operator will then identify the areas of activity with the populations and obtain consent for the implementation of the project. The promoter identifies the populations living near his concession, informs them and decides, with them, of the co-management elements in the common areas.</p> <p>- Minor compliance -</p>	Not Applicable (N/A) The company has not acquired new land for plantings as of the time of this audit.	Not Applicable
4.5.8	<p>(C) New lands are not acquired in areas inhabited by communities in voluntary isolation.</p> <p>- Critical (Major) compliance -</p>	Not Applicable (N/A) The company has not acquired new land for plantings as of the time of this audit.	Not Applicable
<p>Criterion 4.6: Any negotiations Concerning compensation for loss of legal, customary or user rights are dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.</p>			
4.6.1	<p>(C) A mutually agreed procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, is in place.</p> <p>- Critical (Major) compliance -</p>	The company has a documented procedure that guides in identifying people entitled to crop compensation. The procedure dated 20/06/2014 has been approved by the Director of plantations.	Complied
4.6.2	<p>(C) A mutually agreed procedure for calculating and distributing fair and gender-equal compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation.</p> <p>- Critical (Major) compliance -</p>	The price per tree for each agricultural crop is determined by the Agricultural Department of Gabon. Based on the price guidelines provided by the government agency, the company pays each of the farmers entitled to crop compensation. Sample evidence of crop compensation payment made to the farmers were made available for review. Interview with the Guidouma, Rembo, Mboukou,	Complied

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		Kanana, Diangui and Mandji communities during the audit confirmed crop compensation payment to all farmers who lost their crops during Olam's industrial plantation establishment.	
4.6.3	<p>Evidence is available that equal opportunities are provided to both men and women to hold land titles for small holdings.</p> <p>PROCEDURAL NOTE: In Gabon, land belongs to the State. For this reason, operators have no influence on the allocation of land titles.</p> <p>- Minor compliance -</p>	Not applicable as the company does not have smallholder operations in their operations	Not Applicable
4.6.4	<p>The process and outcomes of any negotiated agreements, compensation and payments are documented, with evidence of the participation of affected parties, and made publicly available to them.</p> <p>- Minor compliance -</p>	Reviewed evidence of payment made to all the people entitled to compensation. Copies of the payment receipts have also been shared with the aggrieved people. During the audit interview, the community representatives confirmed payments were made as compensation for crop losses.	Complied
Criterion 4.7: Where it can be demonstrated that local peoples have legal, customary or user rights, they are compensated for any agreed land acquisitions and relinquishment of rights, subject to their FPIC and negotiated agreements.			
4.7.1	<p>(C) A mutually agreed procedure for identifying people entitled to compensation is in place.</p> <p>- Critical (Major) compliance -</p>	Land for Olam operations are the result of negotiations with the state. The community did not contribute land to Olam's operations. Nonetheless, should there be any land acquisition that is subject to compensation on loss of customary or user right, the compensation procedure following the Decree No 1016/PR/MAEPDR will be adhered to. The compensation procedure was established from discussion and validation by the Project Steering Committee on 02/08/2012.	Complied

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4.7.2	(C) A mutually agreed procedure for calculating and distributing fair compensation (monetary or otherwise) is in place and documented and made available to affected parties. - Critical (Major) compliance -	Land for Olam operations are the result of negotiations with the state. The community did not contribute land to Olam's operations.	Complied
4.7.3	Communities that have lost access and rights to land for plantation expansion are given opportunities to benefit from plantation development. - Minor compliance -	Land for Olam operations are the result of negotiations with the state. The community did not contribute land to Olam's operations.	Complied
Criterion 4.8: The right to use the land is demonstrated and is not legitimately contested by local people who can demonstrate that they have legal, customary, or user rights.			
4.8.1	Where there are or have been disputes, proof of legal acquisition of title and evidence that mutually agreed compensation has been made to all people who held legal, customary, or user rights at the time of acquisition is available and provided to parties to a dispute, and that any compensation was accepted following a documented process of FPIC. - Minor compliance -	Review of land documents and interview with the communities did not identify land disputes in any of Olam's operations.	Complied
4.8.2	(C) Land conflict is not present in the area of the unit of certification. Where land conflict exists, acceptable conflict resolution processes (see Criteria 4.2 and 4.6) are implemented and accepted by the parties involved. In the case of newly acquired plantations, the unit of certification addresses any unresolved conflict through appropriate conflict resolution mechanisms. - Critical (Major) compliance -	Review of land documents and interview with the communities did not identify land disputes in any of Olam's operations.	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	Review of land documents and interview with the communities did not identify land disputes in any of Olam's operations.	Complied

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	rights, these claims will be settled using the relevant requirements (Indicators 4.4.2, 4.4.3 and 4.4.4). - Minor compliance -		
4.8.4	For any conflict or dispute over the land, the extent of the disputed area is mapped out in a participatory way with involvement of affected parties (including neighbouring communities where applicable). - Minor compliance -	Review of land documents and interview with the communities did not identify land disputes in any of Olam's operations.	Complied
Principle 5: Support smallholder inclusion			
Criterion 5.1: The unit of certification deals fairly and transparently with all smallholders (Independent and Scheme) and other local businesses.			
5.1.1	Current and previous period prices paid for FFB are publicly available and accessible by smallholders. - Minor compliance -	Olam Palm Gabon (OPG) does not source FFB from any smallholders or out growers. All FFB processed originates from OPG own estates.	Not Applicable
5.1.2	(C) Evidence is available that the unit of certification regularly explains the FFB pricing to smallholders. - Critical (Major) compliance -	Olam Palm Gabon (OPG) does not source FFB from any smallholders or out growers. All FFB processed originates from OPG own estates.	Not Applicable
5.1.3	(C) Fair pricing, including premium pricing, when applicable, is agreed with smallholders in the supply base and documented - Critical (Major) compliance -	Olam Palm Gabon (OPG) does not source FFB from any smallholders or out growers. All FFB processed originates from OPG own estates.	Not Applicable
5.1.4	(C) Evidence is available that all parties, including women and independent representative organisations assisting smallholders where requested, are involved in decision-making processes and understand the contracts. These include those involving finance, loans/credits, and repayments through FFB price reductions for replanting and/or other support mechanisms where applicable. - Critical (Major) compliance -	Olam Palm Gabon (OPG) does not source FFB from any smallholders or out growers. All FFB processed originates from OPG own estates.	Not Applicable

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Criterion / Indicator		Assessment Findings	Compliance
5.1.5	Contracts are fair, legal and transparent and have an agreed timeframe. - Minor compliance -	Olam Palm Gabon (OPG) does not source FFB from any smallholders or out growers. All FFB processed originates from OPG own estates.	Not Applicable
5.1.6	(C) Agreed payments are made in a timely manner and receipts specifying price, weight, deductions and amount paid are given. - Critical (Major) compliance -	Olam Palm Gabon (OPG) does not source FFB from any smallholders or out growers. All FFB processed originates from OPG own estates.	Not Applicable
5.1.7	Weighing equipment is verified by an independent third party on a regular basis (this can be government). - Minor compliance -	Olam Palm Gabon (OPG) does not source FFB from any smallholders or out growers. All FFB processed originates from OPG own estates.	Not Applicable
5.1.8	The unit of certification supports Independent Smallholders with certification, where applicable, ensuring mutual agreements between the unit of certification and the smallholders on who runs the internal control system (ICS), who holds the certificates, and who holds and sells the certified material. - Minor compliance -	Olam Palm Gabon (OPG) does not source FFB from any smallholders or out growers. All FFB processed originates from OPG own estates.	Not Applicable
5.1.9	(C) The unit of certification has a grievance mechanism for smallholders and all grievances raised are dealt with in a timely manner. - Critical (Major) compliance -	Olam Palm Gabon (OPG) does not source FFB from any smallholders or out growers. All FFB processed originates from OPG own estates.	Not Applicable
Criterion 5.2: The unit of certification supports improved livelihoods of smallholders and their inclusion in sustainable palm oil value chains.			
5.2.1	The unit of certification consults with interested smallholders (irrespective of type) including women or other partners in their supply base to assess their needs for support to improve their livelihoods and their interest in RSPO certification. - Minor compliance -	Olam Palm Gabon (OPG) does not source FFB from any smallholders or out growers. All FFB processed originates from OPG own estates.	Not Applicable

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5.2.2	<p>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).</p> <p>PROCEDURAL NOTE:</p> <p>The RSPO just developed a separate standard for Independent Smallholders and the Gabon NIWG decided to make it applicable for all Independent Smallholders in Gabon (see Annex 6).</p> <p>- Minor compliance -</p>	Olam Palm Gabon (OPG) does not source FFB from any smallholders or out growers. All FFB processed originates from OPG own estates.	Not Applicable
5.2.3	<p>Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production.</p> <p>- Minor compliance -</p>	Olam Palm Gabon (OPG) does not source FFB from any smallholders or out growers. All FFB processed originates from OPG own estates.	Not Applicable
5.2.4	<p>(C) Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling.</p> <p>- Critical (Major) compliance -</p>	Olam Palm Gabon (OPG) does not source FFB from any smallholders or out growers. All FFB processed originates from OPG own estates.	Not Applicable
5.2.5	<p>The unit of certification regularly reviews and publicly reports on the progress of the smallholder support programme.</p> <p>- Minor compliance -</p>	Olam Palm Gabon (OPG) does not source FFB from any smallholders or out growers. All FFB processed originates from OPG own estates.	Not Applicable
Principle 6: Respect workers' rights and conditions			
Criterion 6.1: Any form of discrimination is prohibited.			
6.1.1	<p>(C) A publicly available non-discrimination and equal opportunity policy is implemented in such a way to prevent discrimination based on ethnic origin, caste, national origin, religion, disability, gender, sexual</p>	The company has a documented fair employment policy dated September 2018. The policy states that the company is committed to providing a workplace where rights of all employees are respected. The goal is to treat all employees with dignity and	Complied

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	orientation, gender identity, union membership, political affiliation or the age legally authorized at the national level. - Critical (Major) compliance -	fairness and to take a proactive approach to protecting the rights of people in all our workplaces.	
6.1.2	(C) Evidence is provided that workers and groups including local communities, women, and migrant workers have not been discriminated against. Evidence includes migrant workers' non- payment of recruitment fees. - Critical (Major) compliance -	Interview with the workers representatives in Lot 1 and Lot 2 did not identify any issue of discrimination in the company. Further interview with the communities in Lot 1 and Lot 2 did not also identify any case of discrimination. They indicated that such issues do not exist in the company. Review of the company's recruitment procedure and interview with the workers in both Lot 1 and Lot 2 confirms the absence of discrimination in the company's operational activities.	Complied
6.1.3	The unit of certification demonstrates that recruitment selection, hiring, access to training and promotion are based on skills, capabilities, qualities and medical fitness necessary for the jobs available. - Minor compliance -	The company has documented procedures for that guides the recruitment of expatriates, communities and Gabonese dated 13 th January 2023. The procedure for the communities is a result of an agreement with the company to give priority to the communities whenever there are the need for workers. Interview with the Human Resource manager confirmed the categorization of expatriate as non-citizens of Gabon The procedures are <ol style="list-style-type: none"> 1. Procedure Interne de Recruitment de Travailleurs Entrangers, referenced 001/03/2016/RH/GT dated May 2016 2. Procedure d'embauche Prioritaire referenced MLA1-PRO 5-CRSS dated June 2015 3. Procedure de Recrutement des Employes Nationaux referenced 2708/2016RH/JM dated 27/08/2016. A review of the procedure for expatriate workers shows the following	Complied

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		<ul style="list-style-type: none"> a. Job Advertisement of the position b. Acceptance of Job offered c. Provision of the all necessary document by the candidate d. Submitting such documents to the company e. Arrival of candidate in Gabon and meeting with the company HR manager and medical test f. Acceptance and signing of the contract g. Issued with a foreign worker's card h. Issuance of a Visa card <p>The procedure for recruitment of a Gabonese is as follows</p> <ul style="list-style-type: none"> i. Job Advertisement j. Selection of CVs k. Interview by Head of Department l. Selection of qualified applicant m. Approval of budget n. Job Appointment o. Medical test p. Complete a personal form <p>On the 11th December 2023, the company made an advertisement for the recruitment of Excavator operator. The advertisement led to an application of just one person who is still going through the recruitment process.</p>	

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6.1.4	Pregnancy testing is not conducted as a discriminatory measure and is only permissible when it is legally mandated. Alternative equivalent employment is offered for pregnant women. - Minor compliance -	Interview with the Human Resource manager indicates the company conducts medical test on all their workers during recruitment including pregnancy test. The essence of the pregnancy test to pregnant women receive the needed attention and also not placed in a section that will endanger their lives.	Complied
6.1.5	(C) A gender committee is in place specifically to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women. - Critical (Major) compliance -	The company has a gender committee in place for both Lot 1 and Lot 2 estates made up of 9 committee members. The committee hold periodic meetings among themselves and also have a documented annual programme in place. Interview with sampled workers during the estates visits indicates the workers are aware of the Gender committee and their activities.	Complied
6.1.6	There is evidence of equal pay for the same work scope and provision of similar necessary working tools. PROCEDURAL NOTE: The verification is based on the sectoral collective agreement or, failing that, a company-wide agreement, or any other document recognized by the administration which clearly stipulates the applicable salary bases. - Minor compliance -	The company has a documented list captioned Classification Professionnelle des Emplois Palm dated 08/02/2017. The list has information on all the job categories present in the company. In addition, the company has a salary grade captioned Grille Salariale-Personnel d'exécution dated 08/02/2017. The document has information on all the job categories and their corresponding salaries. The Jobs has been grouped into grades such as OE1, OE2, OE3 and others. This document guides the payment of the workers to ensure workers in the same categories and doing same work receive same pay. During the audit interview with the workers' representatives and sampled workers in the estates there were no complains of workers receiving different salaries for the same work done.	Complied
Criterion 6.2: Pay and conditions for staff and workers and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages (DLW).			
6.2.1	(C) Applicable labour laws, union and/or other collective agreements and documentation of pay (Salary grid published, same salary for the same	The conduct and activities of the workers and the company are regulated by the negotiated agreement captioned Accord	Complied

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	<p>position) and conditions are available to the workers in national languages and explained to them in a language they understand.</p> <p>PROCEDURAL NOTE:</p> <p>The verification is based on the sectoral collective agreement or, failing that, a company-wide agreement, or any other document recognized by the administration which clearly stipulates the applicable salary bases.</p> <p>- Critical (Major) compliance -</p>	<p>D'Établissement. The previous Accord D'Établissement dated 08/02/2017 has expired and the parties at the time of this audit are in the process of negotiating a new condition of service. While waiting for the Accord D'Établissement to be finalised, the company uses the Convention D' Enterprise dated 18/05/2023 which is a general agreement to regulate their activities or engagements with the workers. The document has been signed by company, workers representatives and the Ministry of Work.</p>	
6.2.2	<p>(C) Employment contracts and related documents detailing payments and conditions of employment (e.g. regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. in compliance with national legal requirements) and payroll documents give accurate information on compensation for all work performed, including work done by family members.</p> <p>- Critical (Major) compliance -</p>	<p>All Olam workers are issued contract document during job appointments and the document has information on their pay and working conditions including working hours for the year, maternity leave, contract duration, holidays and annual leaves, and reason for dismissal. Also, at the end of each month prior to salary payment, each worker is issued a payslip. The payslip details the salary, deductions, overtime, absent hours, bonus, social security, housing rent and others.</p> <p>A review of sampled payslips of three fixed term and permanent workers (0XXXX9, 06XXXX, 0XXXX6, 06XXXX, 06XXX6, 066XXX, 01XXXX, 0XXXX0, 01XXX5 and 0XXXX6) confirmed the payment and deduction were in line with negotiated agreement and the labour code.</p>	Complied
6.2.3	<p>(C) There is evidence of legal compliance for regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice and other legal labour requirements.</p> <p>- Critical (Major) compliance -</p>	<p>In the agricultural sector, the Gabon labour law states that the total working hours per workers is 2400 hours. This is consistent with the requirement under Article 10 of the workers condition of service. This translates into a daily working hour from Monday to Friday of 8 hours and 6 hours on the Saturday making 46 hours per week. Any additional hours made is paid as overtime. A review of sampled workers payslip confirms the payment of overtime to all workers who works in excess of the 46 hours. Further interview with the</p>	Complied

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		workers representatives confirmed the payment of overtime hours. They also confirmed the respect for maternity, sick and annual leave.	
6.2.4	<p>(C) The unit of certification provides adequate housing, sanitation facilities, drinking water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. National laws, or in their absence the ILO Guidance on Workers' Housing Recommendation No. 115, are used. In the case of acquisitions of non-certified units, a plan is developed detailing the upgrade of infrastructure. A reasonable time (5 years) is allowed to upgrade the infrastructure.</p> <p>- Critical (Major) compliance -</p>	<p>The company provides housing to most of their workers both permanent and contract workers. The working families are giving a house each which is made up of a two-bedroom apartment with toilet, kitchen and a bathhouse. However, for non-family workers, two workers are giving a house to share. Thus, a worker per room and two workers shares same toilet, kitchen and bath.</p> <p>For Olam workers who are not provided with accommodation, the company provides housing allowance to cater for their accommodation needs. For contractor's workers, the company has an agreement with the contractors to provide rooms for their contracted workers. Interview with the HR manager indicates there are 4 workers per room. Field visit also confirmed the housing of 4 workers per room. The number per room meets the requirements of the country's housing policy.</p> <p>The company ensure access to water for the workers which was confirmed during the housing visit and interview with the workers. The company also have a hospital which is open to all workers at no cost. There are educational facilities where the workers children attend school.</p>	Complied
6.2.5	<p>The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food.</p> <p>- Minor compliance -</p>	<p>The company has created an avenue for the establishment of a shop where workers can access some of their needs. Also, every Wednesday after work, Saturday and Sunday, the company provides buses for workers to towns where workers can access all their food stuffs.</p>	Complied

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<p>6.2.6 A DLW is paid to all workers, including those on piece rate/quotas, for whom the calculation is based on achievable quotas during regular work hours.</p> <p>PROCEDURAL NOTE:</p> <p>STATEMENT FROM THE RSPO STANDARDS STANDING COMMITTEE REGARDING INDICATOR 6.2.6 ON DECENT LIVING WAGE (Endorsed by the RSPO BoG on 7th November 2019)</p> <p>With reference to procedural note of indicator 6.2.6, the RSPO has published a guidance on the DLW calculation in June 2019. The RSPO Secretariat will endeavour to carry out DLW country benchmarks for palm oil producing countries in which RSPO members operate and for which no Global Living Wage Coalition (GLWC) benchmarks exist¹</p> <p><i>Where a GLWC living wage standard (benchmark), or one that fulfils the basic requirements of the RSPO- endorsed living wage methodology, has been established in the country or region of operation, the same should be used as benchmarks.</i></p> <p>In the absence of such benchmarks, the RSPO will collaborate with the GLWC and/or local experts on developing oil palm industry benchmarks². These benchmarks will be developed in collaboration and consultation with relevant stakeholders such as palm oil industry members, workers' union, authorities and/or relevant organisations.</p> <p><i>For countries where no living wage standard is established, until such time that an RSPO endorsed benchmark for the country is in place, national minimum wages shall be paid to all workers. In addition to the payment of minimum wages, the Unit of Certification (UoC) shall conduct an assessment of the prevailing wages and in-kind benefits provided to workers in the Unit of Certification aligned with the RSPO Guidance for Implementing a Decent Living Wage³.</i></p> <p>The Gabon NIWG will, on their side, start identifying the existent national statistics necessary for the calculations as stipulated in the new RSPO-endorsed living wage methodology.</p> <p>Once these benchmarks are available, this procedural note is no longer applicable. UoC shall have an implementation plan towards the payment of a DLW with specific targets, and a phased implementation process including:</p> <ul style="list-style-type: none"> Updated assessment on prevailing wages and in-kind benefits 	<p>The company has conducted an assessment of the prevailing wage it currently pays the workers. The assessment was revised in December 2022 and it covers workers accommodated onsite and those not accommodated and the calculation is based on the national minimum wage. The assessment considered some in-kind benefits such as housing allowance, transportation, education and health care. The current minimum wage paid by the company to staff 512,439 CFA which is far above the national minimum wage.</p>	<p>Complied</p>

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Criterion / Indicator		Assessment Findings	Compliance
	<ul style="list-style-type: none"> There is annual progress on the implementation of living wages Where a minimum wage, based on equivalent of baskets of goods, is stipulated in Collective Bargaining Agreements (CBAs), this should be used as the foundation for the gradual implementation of the living wage payment The UoC may choose to implement the living wage payment in a specific section as a pilot project; the pilot will then be evaluated and adapted before eventual scale up of the living wage implementation. <p>- Minor compliance -</p>		
6.2.7	<p>Permanent, full-time employment including contractors' workers and contracted workers is used for all core work performed by the unit of certification. Casual, temporary and day labour is limited to jobs that are temporary or seasonal.</p> <p>- Minor compliance -</p>	<p>There are two categories of workers under the direct control of the company. They are the permanent workers and the fixed term workers. There are also contractor workers who are under the direct control of Contractors who provide maintenance services in the estates to the company. All Olam workers in the plantations are permanent workers. There were no temporal workers in the company at the time of this audit</p>	Complied
<p>Criterion 6.3: The unit of Certification respects the rights of all personnel to form and join trade unions of their choice and to bargain collectively. Where the right to freedom of association and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all such personnel.</p>			
6.3.1	<p>(C) A published statement recognising freedom of association and right to collective bargaining in national languages is available and is explained to all workers in languages that they understand, and is demonstrably implemented. The official language is the language which is recognized as such in the constitution and / or the laws of the country concerned. It is the language used in government and public services.</p> <p>- Critical (Major) compliance -</p>	<p>Interview with the Human Resource manager indicates the Gabon labour code states in Article 303 that each and every worker has the freedom to join any group or association of their choice. Also, the company has a published Freedom of Association statement captured in the Human Rights policy dated 1st September 2019. The statement indicates</p> <ol style="list-style-type: none"> Workers shall have the right to join, or to refrain from joining, representative associations of their choice and to bargain collectively 	Complied

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		<p>2. A worker's choice to form or join an association will not compromise their equal treatment at work.</p> <p>Interview with the workers representatives and sampled workers during the onsite visit confirms their knowledge of the statement. All workers interviewed indicates they belong to the workers union.</p>	
6.3.2	<p>Minutes of meetings between the unit of certification with trade unions or workers representatives, who are freely elected, are documented in national languages and made available upon request.</p> <p>- Minor compliance -</p>	<p>The company holds meetings with the worker representative's ones every month and when every necessary. This was confirmed by the workers' representatives during the audit interviews. For all such meeting, the company keeps records of the minutes of meetings. Copies of the minutes of meetings with attendance were made available for review. They are</p> <p>1. Meeting between HR and the Workers Rep Date: 10th August 2023 Attendance: 22 members</p> <p>2. Meeting between HR and the Workers Rep Date: 25th September 2023 Attendance: 13 members</p> <p>Interview with the representatives indicates they have access to the meeting records.</p>	Complied
6.3.3	<p>Management does not interfere with the formation or operation of registered unions/ labour organisations or associations, or other freely elected representatives for all workers including migrant and contract workers.</p> <p>- Minor compliance -</p>	<p>Interview with the workers' representatives during the audit period indicates management does not interfere in the operations of the union.</p>	Complied

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Criterion / Indicator		Assessment Findings	Compliance
Criterion 6.4: Children are not employed or exploited.			
6.4.1	<p>A formal policy for the protection of children, including prohibition of child labour and remediation is in place, and included into service contracts and supplier agreements.</p> <p>- Minor compliance -</p>	<p>Olam has a published statement on Child labour which is applicable to all their subcontractors. The document describes child labour as work that is</p> <ul style="list-style-type: none"> i) mentally, physically, socially or morally dangerous and harmful to children ii) and interferes with their schooling by depriving them of the opportunity to attend school; iii) obliging them to leave school prematurely or requiring them to attempt to combine school attendance with excessively long and heavy work. <p>The document states that the company does not employ workers that are below the age of 18 years in their operations. In the agreements signed with their contractors, it requires the contractor to comply with the provisions of the labour code. Interview with sampled workers and also during field visit, none of the workers were observed to be below the age of 18 years.</p>	Complied
6.4.2	<p>(C) There is evidence that minimum age requirements are met. Personnel files show that all workers are above the national minimum age or above company policy minimum age, whichever is higher. There is a documented age screening verification procedure that is to say, provision of a national identity document for the national worker officially recognized at national level and a residence permit (CDS - Carte de séjour in French) for the foreign worker which is the subject of documentation.</p> <p>- Critical (Major) compliance -</p>	<p>Interview with the Human Resource manager indicates a number of mechanisms are used to verify the age of all applicants including those for their subcontractors. They include verification of their birth certificates, national identity cards and the picture of the worker. This was in line with the documented procedure for age verification for recruitment of Expatriates and citizen</p> <p>During field visits, there was no observation made of a worker under the age of 18 years in the plantations. Also, a review of the file did not identify any below the age of 18 years.</p>	Complied

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Criterion / Indicator		Assessment Findings	Compliance
6.4.3	(C) Young workers (between 16 and 18 years old) are not employed in RSPO certified companies in Gabon. The minimum age is 18 years old. - Critical (Major) compliance -	Review of sampled workers files including 0XXXX9, 06XXXX, 0XXXX6, 06XXXX, 06XXXX, 0XXXX8, 01XXXX, 0XXX80, 01XXX5 and 0XXXX6 and observation during estate visits and interview with workers confirms the company does not employ worker below the age of 18 years in their operations.	Complied
6.4.4	The unit of certification demonstrates communication about its 'no child labour' policy and the negative effects of child labour, and promotes child protection to supervisors and other key staff, smallholders, FFB suppliers and communities where workers live. - Minor compliance -	During interview with the chiefs and representatives from the Guidouma, Rembo, Mboukou, Kanana, Diangui and Mandji communities, they confirmed the company has communicated the no child labour policy together with the other company policy to their understanding. This was also confirmed by the workers representatives during the audit interviews. The company does not have FFB suppliers in their operations.	Complied
Criterion 6.5: There is no harassment or abuse in the workplace, and reproductive rights are protected.			
6.5.1	(C) A policy to prevent sexual and all other forms of harassment and violence is implemented and communicated to all levels of the workforce. - Critical (Major) compliance -	Olam-Bilala has a documented sexual harassment policy dated September 2018. The document which also covers work place violence states the actions and behaviours that qualifies as sexual and workplace harassment. The document also provides guidelines on what one must do when sexually abused. Interview with sampled workers in the Lot 1 and 2 all confirmed the policy has been explained to their understanding and demonstrated knowledge of the policy. Further interview with the Gender Committee indicates they have not received any case of sexual or workplace harassment during the year under review.	Complied
6.5.2	(C) A policy to protect the reproductive rights of all, especially of women, is implemented and communicated to all levels of the workforce. - Critical (Major) compliance -	OPG-Bilala POM has a documented Reproductive policy which is captured in the company's Human Rights policy dated 1st September 2022. The policy states that reproductive rights are	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		protected with full implementation of all relevant articles of Gabon labour code (Article 170 to 175). The policy has been displayed on the company's notice boards. Reviewed records of sensitization on the policy by the gender committee to the workers on the 29 th December 2023 at Mboukou. Further interview with sampled workers during the estate visit confirmed their awareness of the policy.	
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. - Minor compliance -	The Gender Committee every year hold meetings with all new mothers to assess their needs. For the year under review, the committee held a meeting with the new mothers on the 11 th August 2023 to among other things assess their needs and provide solutions to them. A review of the meeting records indicates the new mothers complained of the distant travel in the estates to their work site. As a result, all the new mothers were assigned to works that will not require them to join their colleagues travelling farther into the estates.	Complied
6.5.4	A grievance mechanism, which respects anonymity and protects complainants where requested, is established, implemented and communicated to all levels of the workforce. - Minor compliance -	The company has a documented procedure for handling grievance captioned Procedure de Gestion des Plaintes est Reclamations referenced SOP N O07/SD-GP (9)/0622 and dated 16/06/2022. The documented procedure outlines the process for addressing internal grievances and external grievance. For each category of grievance, the procedure make provision for a timeline (maximum one month) for resolving the complaints submitted. The procedure also states that the complainant can request for anonymity when filing a complaint.	Complied
Criterion 6.6: No forms of forced or trafficked labour are used.			
6.6.1	(C) All work is voluntary and the following are prohibited:	Review of workers file and field visit did not identify the presence of migrant workers in the company. This was also confirmed by the	Complied

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	<ul style="list-style-type: none"> Retention of identity documents or passports Payment of recruitment fees Contract substitution Involuntary overtime. Lack of freedom of workers to resign Penalty for termination of employment Debt bondage Withholding of wages <p>- Critical (Major) compliance -</p>	human resource manager during the audit interview. However, interview with the workers representatives, and field workers indicates they are not subjected to issues such as payment of penalties for the termination of employment, debt bondage, withholding of wages and the others.	
6.6.2	<p>(C) Where temporary or migrant workers are employed, a specific labour policy and procedures are established and implemented.</p> <p>- Critical (Major) compliance -</p>	Review of documents and field visit did not identify temporal or migrant workers in the company at the time of this audit. However, since the company occasionally recruits temporal and migrant workers, they have developed a documented specific labour policy and procedures in place for the migrant workers. The document captioned Foreign Workers recruitment policy referenced SOP No12/SD-FWR (01)/0820 and dated 3rd August 2020. The temporal workers are cover by the existing labour policy that covers all workers of Gabon and are represented by the workers union.	Complied
Criterion 6.7: The unit of certification ensures that the working environment under its control is safe and without undue risk to health.			
6.7.1	<p>(C) The responsible person(s) for H&S is identified. There are records of regular meetings between the responsible person(s) and workers. Concerns of all parties about health, safety and welfare are discussed at these meetings, and any issues raised are recorded.</p> <p>- Critical (Major) compliance -</p>	The CU has a Safety Committee consisting of representatives of staff (3 persons) and representatives of workers (6 person) apart from the President, Head of Safety, and Medical. The latest committee is effective from 26/01/2022. The committee have conducted their regulated quarterly safety committee meeting in-line with the Decree No. 006/MTEPS released by the Ministry of Work, Labour and Employment, dated 12/04/2010. The last four meetings were conducted on 24/08/2023, 13/06/2023, 27/02/2023, and 23/12/2022. Based on the attendance records, it was observed	OFI

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		<p>that the participation from workers representatives can be further improved (OFI). Generally, among the agenda discussed in the meetings are:</p> <ul style="list-style-type: none"> • Confirmation of minutes previous meeting • Analysis of occupational accidents statistic • Workplace and job inspection • Evaluation of safety performance for the period under review • Other matters 	
6.7.2	<p>Accident and emergency procedures are in place and instructions are clearly understood by all workers. Accident procedures are available in the appropriate language of the workforce. Assigned operatives trained in first aid are present in both field and other operations, and first aid equipment is available at worksites. Records of all accidents are kept and periodically reviewed.</p> <p>- Minor compliance -</p>	<p>The procedures for accident and emergencies (Rspnse d'urgnce enc as d'accident, rev 2, dated 09/09/2022) have been established. There is formation of ERP Team & ERP for all the identified incidences. In addition, the procedures have been summarized in a chart flow form and displayed for information of all employees in the estates/mill. They include emergencies relating fire, chemical spillage, and accident at workplace.</p> <p>ERT members have been provided with training on emergency procedures appropriate to their respective workplace and level of risk. The trainings were conducted internally by the competent person.</p> <p>The trained personnel for the First Aid were among the employees working as field staff (Chef de Equipe-CDQ). The first aid kits were available at various points in the estate & mill operations, office, workshop, and store</p>	Complied
6.7.3	<p>(C) Workers use appropriate personal protective equipment (PPE), which is provided free of charge to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, land preparation, and harvesting. Sanitation facilities for</p>	<p>The management provides appropriate PPE to the employees in accordance with the risk assessment and PPE Matrix. PPE issuance records were well maintained and made available for verification. Among the information available in the record was name of employee, type of PPE (i.e., coverall suit, safety shoes, rubber boots, respirator, cartridge, helmet, goggles, cotton gloves, leather</p>	Complied

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	those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing. - Critical (Major) compliance -	gloves, etc.), date of PPE received and receipt acknowledgement by the recipient. Sanitation facilities such as shower room, PPE washing area, personal clothing locker for those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing were provided and well maintained. Based on field visit at all the sample operating units, the PPE and sanitation facilities were well provided and utilised	
6.7.4	All workers are provided with medical care and covered by accident insurance. Costs incurred from work-related incidents leading to injury or sickness are covered in accordance with national law or by the unit of certification where national law does not offer protection. - Minor compliance -	Should there be any medical care needed by the employees, clinic with doctor in-charge is provided which is in Estate 4 for Lot 1 and Estate 9 for Lot 2. Based on site visits, the clinic was well maintained and managed. Records of treatment, and medical itinerary were well updated. OPG is subscribing to the CNSS to cover the accident insurance for all their employees, including workers. The contribution is made quarterly, and the latest payment was made on 26/10/2023 as verified through the receipt #23Q0000143354.	Complied
6.7.5	Occupational injuries are recorded using Lost Time Accident (LTA). - Minor compliance -	The RSPO's Lost Time Injury Frequency Rate (LTIFR) metrics was used to record the number of lost time injuries and total hours worked for the period of Jan – Dec of 2022. Verification against the certification unit's other records such as accident reports and summary found the data to be accurate.	Complied
Principle 7: Protect, conserve and enhance ecosystems and the environment			
Criterion 7.1: Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management (IPM) techniques.			
7.1.1	(C) IPM plans are implemented and monitored to ensure effective pest control.	At OPG Bilala, the main pest issue is attacks from elephants. To manage this, OPG Bilala has put in a place an extensive programme	Complied

Criterion / Indicator	Assessment Findings	Compliance
<p>- Critical (Major) compliance -</p>	<p>to manage elephant encroachment into its plantations. This programme includes a system of trenches that have been dug around the plantation. Additionally, Olam has introduced a system of electric wiring around its different estates as evidenced by its elephant management programme.</p> <p>The Elephant Trench Monitoring Map – Mouila Lot 1 (GIS-Drone Department/Olam Lebamba; Syst: WGS_1984_UTM_Zone_32S; Dated 11/21/2022, represents the elephant trenches dug as of this date. 31,301Km have been dug in estate 5, while 53,535Km have been dug in Estate 6; meanwhile a total of 185,798Km have been dug in Mouila Lot 1.</p> <p>Fencing Phase 1-2-3-4 Mouila Lot 1; GIS-Drone Department/ Olam Lebamba; Syst: WGS_1984_UTM_Zone_32S, dated 11/21/2023 represents the length of electric wire fencing that has been conducted as of this day. 69.1Km of electric wire fencing have been done.</p> <p>OPG Bilal carried out an information/sensitization campaign of its workers in lot 1 on the establishment of the electric fencing. A report of the campagne was seen during the audit (rapport d'Information et de Sensibilization, written by Moukanimambou Bipakila, Head of Social unit, OPG Lot 1, and Dated April 2023. The campaign was organised from 16 March 2023 until 13 April 2023, covering different worker categories on different days.</p>	

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		<p>For this OPG has developed a policy/procedure to frame the dangers of the electric fencing and how to manage them. (La Cloture Electrique: Les Secrets de la Prise de Tere, dated 19/02/2011)</p> <p>FOR LOT 2:</p> <p>Elephant Trench Monitoring Map – Mouila LOT 2: Olam Drone Department/Olam Lebamba ; Syst. WGS_1984_UTM_Zone_82S and Dated : 21/11/2022; shows that 31187Km of trenches have been dug around estate 8, while 91456Km have been dug around estate 9. A total of 191,291Km have been dug in Lot2 while 153839Km are projected to be dug.</p> <p>Additionally, OPG Bilala conducts censuses to identify and manage different pests as evidenced by: Caterpillar verification field visit conducted on 12th January 2023 and 16th December 2023. To ascertain the level of infestation i.e. serious or moderate. Caterpillars of genus latoia were seen.</p>	
7.1.2	<p>Species referenced in the Global Invasive Species Database and CABI.org are not to be used in managed areas, unless plans to prevent and monitor their spread are implemented.</p> <p>- Minor compliance -</p>	OPG Bilala does not use any species referenced in the Global Invasive Species Database and CABI.org.	Complied
7.1.3	<p>There is no use of fire for pest control unless in exceptional circumstances, i.e. where no other effective methods exist, and with prior approval of government authorities. [see guidance section for NI additional guidance for this process].</p> <p>- Minor compliance -</p>	<p>OPG Bilala does not use fire for pest control. There is a zero-fire use policy as prescribed in OPG Agricultural Policy Manual of 2013.</p> <p>Additionally, field observations during the period of the audit did not reveal any use of fire in pest control or any other OPG Bilala operations.</p>	Complied

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Criterion 7.2: Pesticides are used in ways that do not endanger health of workers, families, communities or the environment.			
7.2.1	<p>(C) Justification of all pesticides used is demonstrated. Selective products and application methods that are specific to the target pest, weed or disease are prioritised.</p> <p>- Critical (Major) compliance -</p>	<p>OPG has developed Agriculture Policy Manual Volume 1 and Volume 2 (dated Nov 2022). Justification of pesticide use specifically to the targeted pest, weed or disease is spelt out in Chapter 9 of the Manual, titled Immature Maintenance and Ablation.</p> <p>Additionally, OPG keeps a record of pesticides and their specific uses as evident in Document Number: PRP-EN02, Issue No. 1; of 05/10/2017.</p> <p>Apart from that, Chapter 15 of OPG agriculture manual covers the Integrated Pest & Disease Management Practices, where treatment and management of insects and leaf-eating pests are addressed.</p> <p>Nonetheless, the understanding of the definition of pre-mixed herbicides can be further improved since there is a difference of practice between Lot 1 and Lot 2. At Lot 1, the practice is by filling in the 20 lt of jerry cans, the practice is by filling in the 20 lt of jerry cans with 20 lt of water and 80 ml of glyphosate, then bring them to the field that to be filled directly to the 16 lt knapsack sprayers. Whereas at Lot 2, the practice is by filling in a jerry can with 10 lt of glyphosate and 10 lt of water. The solution is then brought to the field. From that jerry can, the operators then take 100 ml (as dosage) to be filled in their 16 lt knapsack spray which had been filled with water earlier. (OFI)</p>	OFI
7.2.2	<p>(C) Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per ha and number of applications) are provided.</p> <p>- Critical (Major) compliance -</p>	<p>Records of pesticides used were addressed in a master sheet titled (Health and Safety Form: Pesticides Active Ingredients Analysis per Ha, Document Number: PRP-EN02, Issue No. 1; of 05/10/2017). The format has the information about records of pesticides use (including active ingredients used and their LD50, area treated, and</p>	Complied

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		amount of active ingredient. All the sampled estates have made the records available for verification. Based on records such as store bin card, and store inventory records in SAP system, among the major pesticides used by the estates were glyphosate, metsulfuron methyl, and triclopyr butotyl. The amount of a.i./Ha in 2023 is less than 1 lt/Ha for both Lot 1 and Lot 2.	
7.2.3	(C) Any use of pesticides is minimised as part of a plan, eliminated where possible, in accordance with IPM plans. - Critical (Major) compliance -	<p>The quantity of agrochemicals required for various field conditions is documented and justified in Chapter 15 of OPG Agriculture Policy Manual covers Integrated Pest & Disease Management Practices. The manual provides the guideline on type of agrochemical use, target pest/weed/disease, weed situation, recommended chemical, application rate, and method of application.</p> <p>The implementation in the field was found to be consistent with the SOP established.</p>	Complied
7.2.4	There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in national best practice guidelines. - Minor compliance -	There was no evidence of prophylactic use of pesticide at all the sampled estates.	Complied
7.2.5	Pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat, are not used, unless in exceptional circumstances, as validated by a due diligence process, or when authorised by government authorities for pest outbreaks. The due diligence refers to: a) Judgment of the threat and verify why this is a major threat b) Why there is no other alternative which can be used	Through verification of store issuance records, field and chemical stores visit, there was no evidence that pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat, were used at all the sampled estates.	Complied

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	c) Which process was applied to verify why there is no other less hazardous alternative d) What is the process to limit the negative impacts of the application e) Estimation of the timescale of the application and steps taken to limit application to the specific outbreak. - Minor compliance -		
7.2.6	(C) Pesticides are only handled, used or applied by persons who have completed the necessary training and are always applied in accordance with the product label. All precautions attached to the products are properly observed, applied, and understood by workers (see Criterion 3.6). Personnel applying pesticides must show evidence of regular updates on the knowledge about the activity they carry out. - Critical (Major) compliance -	Trainings on safe handling of chemical and right method of spraying were given to the relevant employees which include the storekeeper, pre-mixers, and herbicides sprayers. Various methods of training such as briefing, practical training and on-the-job supervisions were used to ensure effective delivery of knowledge. Records of training were well maintained by the sampled estates for verification. The pesticides handlers were able to show good understanding on pesticide usage and its safety aspects during interview.	Complied
7.2.7	(C) Storage of all pesticides is in accordance with recognised best practices. - Critical (Major) compliance -	Pesticides were found stored in all estate's Chemical Store in accordance with the OPG's Procedure for Storage and Handling of Agrochemical Products (Document Ref OPG-MLA-EHS-SOP-05, dated 01/10/2017, rev. 2). The stores were at all times locked to prevent unauthorised entrance. The hazard signage was observed to be adequately displayed on the exterior and interior walls. Ventilation facilities and safety data sheets were also adequately provided.	Complied
7.2.8	All pesticide containers are properly disposed of and/or handled responsibly if used for storing or for the same purposes. - Minor compliance -	Excess empty chemical containers that were not used for containing pre-mixed chemicals are triple rinsed and punctured and kept at a designated stores in accordance with the Procedure of storage and handling of agrochemical products [OPG-MLA-EHS-SOP-05, dated 01/10/2017, rev. 2]. Nonetheless, the recording of the empty	OFI

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		chemical containers inventory can be further improved to ensure traceability of their movement. (OFI)	
7.2.9	(C) Aerial spraying of pesticides is prohibited. - Critical (Major) compliance -	N/A Aerial spraying of pesticides is not practiced by all the sampled estates.	Not Applicable
7.2.10	(C) Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated. - Critical (Major) compliance -	The existing spraying operators will have to undergo an annual medical surveillance which is regulated under Gabonese Labour Code, Section 3 – Conditions of work and medical surveillance). The surveillances were conducted by doctors employed by the company and records are kept at the estate's clinic. However, the annual surveillances for pesticide operators at Lot 1 were conducted more than one year. Based on records, the latest annual medical surveillance (cholinesterase test) was conducted on 18/12/2023. Whereas the second last was conducted on 27/05/2022 for the same operators, which was more than one year apart. Thus, a non-conformity report was assigned due to this lapse. Operators which were found to be unfit will be assigned to other jobs which are not related to any pesticides.	Non-compliance
7.2.11	(C) No work with pesticides is undertaken by persons under the age of 18, pregnant or breastfeeding women or other people that have medical restrictions and they are offered alternative equivalent work. - Critical (Major) compliance -	Based on site observation and verification of employee master list and interviews at the sampled estates, there was no evidence that work with pesticides is undertaken by persons under the age of 18, pregnant or breastfeeding women or other people that have medical restrictions	Complied
Criterion 7.3: 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.	For Lot 1: OPG Bilala has developed a waste management plan to help manage waste generated at all stations within the unit of	Complied

Criterion / Indicator	Assessment Findings	Compliance
<p>- Minor compliance -</p>	<p>certification. Titled: Plan de Gestion des Dechets; ref: OPG_MLA-QEHS-PLN-01, Created on 01/02/2016, Issue 0.</p> <p>The waste management identifies different wastes produced from different operations such as the nursery, land preparation, farm maintenance, from use of agro-chemicals, from harvesting, from offices and administration, vehicle maintenance activities, etc.</p> <p>The plan categorises waste into different types, such as organic, plastic, scrap metal, empty metal cans, construction waste, etc. the waste management plan equally describes different strategies such segregation at source, collection, storage and final treatment</p> <p>Additionally, visits to the waste storage site revealed that the area has been properly demarcated with wooden pillars and barbed wire to keep both unauthorized persons and animals out.</p> <p>For Lot 2:</p> <p>OPG has developed a waste management plan titled: Gestion des Dechets/Strategie et Procedure; Doc Ref.: Waste-S1-M1.1-Specific Document on Waste Collection (Waste-S1-M1.1-Specific Document on Waste Collection: Strategy and Procedure, which outlines different strategies for collection, segregation at source, identification of different types of waste, storage and final elimination of wastes. The plan includes precautions and safety measures to be taken when handling different waste types.</p>	

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		<p>For specific waste types OPG Bilala uses qualified and authorised service providers to collect and dispose of the waste as evidenced for instance by: Africa Alloys Gabon, BP 13519, collected 5500liters of waste oils as demonstrated by bill of loading No. 050/2023 to collect 6400liters of waste oils, collected on 24/07/2023 and corroborated by delivery bill No. 0053/2023 showing that Africa Alloys Gabon received the 6400liters of waste oil at their site on 27/07/2023.</p> <p>Africa Alloys Gabon has been duly accredited by the government of Gabon (Decision No. 0044/MPERNFM/CAB/CNAP) of the national Anti-Pollution Center, to use, treat and recycle dangerous waste. Article 1 of the decision specifically grants them the authorisation to use spent oils in their processes.</p>	
7.3.2	<p>Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.</p> <p>- Minor compliance -</p>	<p>During a visit to the housing units in Lot 1 and 2, it was observed that some waste at the housing had not been evacuated. Interviews with workers and the housing supervisors indicates the waste accumulation was the result of one and half months (October to mid-November) strike by the workers nation-wide. As a result, no work was being done by workers across the entire country.</p> <p>Following the end of the general workers' strike, OPG has signed an agreement with Geoqualitys, a waste management company for the collection of waste in both Lot 1 and 2 and evacuation has already commenced in some parts of the housing. An OFI is raised against the indicator to monitor the progress made in the evacuation in subsequent audits.</p>	Complied

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7.3.3	The unit of certification does not use open fire for waste disposal. - Minor compliance -	OPG Bilala has developed a fire management plan (document reference DS-PRP.02 and dated 28/03/2020), which strictly prohibits the use of fire in all OPG Bilala operations include waste disposal. Moreover, field visits conducted during the period of the audit did not reveal the use of fire for waste management.	Complied
Criterion 7.4: Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.			
7.4.1	Good agricultural practices, as contained in SOPs, are followed to manage soil fertility to optimise yield and minimise environmental impacts. - Minor compliance -	OPG Bilala has developed a Policy on good agricultural practices titled (Olam Palm Gabon: Agriculture Policy manual (volumes 1 and 2); version 2 and dated November 2022. Different chapters cover different agricultural practices such as nursery techniques and best practices, sprinkler irrigation system for large-scale two-stage nursery; new oil palm planting, soil and water conservation methods, immature maintenance and ablation; legume cover crops establishment and management; field husbandry in mature plantings; harvesting and FFB evacuation; pruning and frond canopy management practices; palm census and palm stand management; integrated pests and diseases management practices; fertilizer sampling for quality control analysis and monitoring of fertilizer schedules; leaf and soil sampling procedures – analysis and interpretation. These practices are implemented as evidenced by annual agronomy reports. For instance, Olam Palm Gabon – Mouila Plantation – Lot 2, Agronomy Department, 6 th Report, Annual Agronomic Report: "Palm Status, Leaf nutrient Survey, Crop Productivity, OER, KER,	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		Audit results & 2024 Fertilizer Recommendation, dated December 2023."	
7.4.2	Periodic tissue and soil sampling is carried out by Companies to monitor and manage changes in soil fertility and plant health. - Minor compliance -	<p>OPG Bilala conducts leaf sampling on an annual basis. The report for 2023 was seen at the time of the audit: Field Observation Report – Leaf Sampling Exercise Mouila Lot 1 A & B (conducted by Agronomy Department Section of Mouila, dated May 2023). A total of 476 composite samples were collected in 13,372 Ha (i.e. 638 blocks). Conducted from 9th February to 31st march 2023.</p> <p>Additionally, OPG conducts a soil sampling every 5 years. The last sampling was conducted in 2020 (Report of Soil Types Fertility Assessment in Mouila – lot 1 – Olam Palm Gabon. Conducted by Agronomy Department Section of Mouila, dated November 2020. The sampling was conducted in 6 estates.</p> <p>FOR LOT 2: Olam Palm Gabon, Mouila Plantation, - Lot 2, Agronomy Department – Section of Mouila. Report of Leaf Sampling Exercise in Mouila-Lot 2, Field Observation. Dated May 2023. Exercise conducted between 8th February to 16th March 2023. 181 samples were collected from 345 blocks in estates 7, 8 and 9.</p>	Complied
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. - Minor compliance -	OPG Bilala nutrient recycling strategy includes EFB application the in fields. Whereas there is no EFB application in Estates 5 and 6 which constituted the sample for this audit, EFB is applied elsewhere in the plantation in Lot 1.	Complied

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		<p>Additionally, OPG has developed a plan to extend POME into fields for application, as evidenced by the report titled: POME Extension of Billa Mill and dated 20/12/2023. At the time of the report, 4 retention ponds had been established within the plantation (Blocks M25 and M26) in Estate 6. A further 11Km of piping is planned to carry the POME into Estate 5 of the plantation for application this year.</p> <p>There are no EFB or POME application in Lot 2 due to considerable distance from the mill in Bilala.</p>	
7.4.4	Records of fertiliser inputs are maintained. - Minor compliance -	<p>Olam Palm Gabon – Mouila Plantation: Lot 1. Agronomy department Section of Mouila. 7th Report Annual Agronomic report: palm Status, Leaf Nutrient Survey, Crop productivity, OER, KER, Audit results & 2023 Fertilizer Recommendations, of December 2022; provides fertilizer recommendations for 2023. The recommendation ranged between 2,0-2.5Kg per palm.</p> <p>Based on these recommendations Fertilizer application is done twice a year i.e. March and October for NPK, while for MOP and Kiserite it is done once a year. Records of fertilizer inputs are maintained and were seen during the audit. These records show that: NPK application for estate 5 equalled 642 tones which covers 2234Ha.</p> <p>For LOT 2: Recommendations of December 2022, provided estimates for 2023. Estate 8: Borate: 1986Ha budgeted, while 697 were realised making 8MT</p>	Complied

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		<p>NPK: 3973Ha were budgeted while 1274 were realised, making 561MT.</p> <p>MOP: 1084Ha budgeted, 726Ha realised, making 45 MT.</p> <p>Estate 9</p> <p>Borate: budgeted 3164Ha, realised 3016Ha making 14MT</p> <p>NPK: budgeted 6276Ha, realised 4070Ha, making 775MT</p>	
Criterion 7.5: Practices minimise and control erosion and degradation of soils.			
7.5.1	<p>(C) Practices minimise and control erosion and degradation of soils.</p> <p>- Critical (Major) compliance -</p>	<p>Planting of leguminous cover crop, as stipulated in Olam Palm Gabon Agriculture Policy Manual (Volume 1), Version 2, of November 2022. Chapter 9 on: Legume Cover Crops Establishment and Management (LCC). Objective 1.3 specifically states that LCC are planted to reduce soil erosion, minimise runoff of fertilizers by providing good ground cover. These practices were evidenced too from field observation during the audit.</p> <p>Moreover, Olam Palm Gabon Bilala Agricultural Policy Manual Vol 1. of April 2013 covers aspects including practices to minimise and control erosion and degradation of soils such as Chapter4: Management of Water and Drainage System; Chapter 6: Methods of Soil and Water Conservation.</p>	Complied
7.5.2	<p>There is no extensive replanting of oil palm on steep terrain.</p> <p>- Minor compliance -</p>	<p>OPG Bilala commissioned a soil survey conducted by PARAM AGRICULTURAL SOIL SURVEYS (M) SDN. BHD (dated October 2018). The results of the survey revealed that the major soil type identified within the OPG Bilala concession is Haplic Nitisol (based on UNESCO soil map). No steep terrain are present within the concession area.</p>	Complied

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		Additionally, OPG has developed an Agricultural Policy Manual Volume 1, of April 2013. Chapter 6: Soil and Water Conservation Methods clearly states that planting is not recommended for inland areas with slope exceeding 20- 30 degrees.	
7.5.3	There is no new planting of oil palm on steep terrain. - Minor compliance -	As indicated in 7.5.2 above, no steep terrain were identified within the OPG Bilala concession. Additionally, no new planting are ongoing at OPG Bilala Lot 1 and Lot 2.	Complied
Criterion 7.6: Soil surveys and topographic information are used for site planning in the establishment of new plantings, and the results are incorporated into plans and operations.			
7.6.1	(C) To demonstrate the long-term suitability of land for oil palm cultivation, soil maps or soil surveys identifying marginal and fragile soils, including steep terrain, are taken into account in plans and operations. - Critical (Major) compliance -	OPG Bilala commissioned a soil survey conducted by PARAM AGRICULTURAL SOIL SURVEYS (M) SDN. BHD (dated October 2018). The results of the survey revealed that the major soil type identified within the OPG Bilala concession is Haplic Nitisol (based on UNESCO soil map). The survey led to the generation of soil maps as evidenced by: The Soil map for Mouila LOT 1 titled: Drone-GIS Department/Olam Lebamba; Syst. WGS_1984_UTM_Zone_32S, dated 6/24/2022; was seen during the audit. Soil Map for Lot 2: Reconnaissance Soil map of Mouila Lot 2 Estate in Ndolou & Tsamba Magotsi Department, Ngounie Province, republic of Gabon (Source: Reconnaissance Soil Map Gabon, Sheet Fougamou, M. Delhumeau, 1974, Scale 1: 200 000)	Complied
7.6.2	Extensive planting on marginal and fragile soils, is avoided, or, if necessary, done in accordance with the soil management plan for best practices. - Minor compliance -	From the soil surveys cited above in 7.6.1, no marginal soils were identified within the OPG Bilala concession.	Complied

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7.6.3	Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure. - Minor compliance -	OPG Agriculture Policy Manual 2022, Volume 1, Chapter 4 covers Estate Road and Drainage Construction Requirements. Specifically, Section 3.4 on Rolling / Hilly / Steep Terrain stipulates that roadside drains must be provided with frequent outlets to lead water onto the terrace. These are the guiding principles for road and other infrastructure planning at OPG bilala certification unit.	Complied
Criterion 7.7: No new planting on peat, regardless of depth after 15 November 2018 and all peatlands are managed responsibly.			
7.7.1	(C) There is no new planting on peat regardless of depth after 15 November 2018 in existing and new development areas. - Critical (Major) compliance -	No peat soils were identified within OPG Bilala concession.	Complied
7.7.2	Areas of peat within the managed areas are inventoried, documented and reported (effective from 15 November 2018) to RSPO Secretariat. PROCEDURAL NOTE: Maps and other documentation of peat soils are provided, prepared and shared in line with RSPO Peatland Working Group (PLWG) audit guidance (see Procedural Note for 7.7.5 below). - Minor compliance -	Not Applicable. No peat soils were identified within OPG Bilala concession.	Not Applicable
7.7.3	(C) Subsidence of peat is monitored, documented and minimised. - Critical (Major) compliance -	Not Applicable. No peat soils were identified within OPG Bilala concession.	Not Applicable
7.7.4	(C) A documented water and ground cover management programme is in place. - Critical (Major) compliance -	Not Applicable. No peat soils were identified within OPG Bilala concession.	Not Applicable

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<p>7.7.5 (C) For plantations planted on peat, drainability assessments are conducted following the RSPO Drainability Assessment Procedure, or other RSPO recognised methods, at least five years prior to replanting. The assessment result is used to set the timeframe for future replanting, as well as for phasing out of oil palm cultivation at least 40 years, or two cycles, whichever is greater, before reaching the natural gravity drainability limit for peat. When oil palm is phased out, it is replaced with crops suitable for a higher water table (paludiculture) or rehabilitated with natural vegetation.</p> <p><u>PROCEDURAL NOTE:</u></p> <p>Full details of the RSPO Drainability Assessment Guidelines and related concepts and detailed actions are in the manual currently being fine-tuned/tested by PLWG. A final version should be approved by PLWG in January 2019 and will include additional guidance on the steps to be followed after the decision not to replant as well as implications for other stakeholders, smallholders, local communities and the unit of certification. It is recommended that a further twelve-month methodology trial period is proposed for all related management units (i.e. those with plantations on peat) to utilise the methodology and provide feedback to the PLWG to enable further refinement of procedure as appropriate before January 2020. Units of certification have the option to defer replanting till after the availability of the revised guidelines. Additional guidance on alternative crops and rehabilitation of natural vegetation will be provided by PLWG.</p> <p><u>PROCEDURAL NOTE:</u></p> <p>PLWG and the Smallholder Interim Group (SHIG) will collaboratively develop guidance for Independent Smallholders [cross links to SHIG and GHG issues].</p>	<p>Not Applicable. No peat soils were identified within OPG Bilala concession.</p>	<p>Not Applicable</p>

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	- Critical (Major) compliance -		
7.7.6	<p>(C) All existing plantings on peat are managed according to the 'RSPO Manual on Best Management Practices (BMPs) for existing oil palm cultivation on peat', version 2 (2018) and associated audit guidance.</p> <p>- Critical (Major) compliance -</p>	Not Applicable. No peat soils were identified within OPG Bilala concession.	Not Applicable
7.7.7	<p>(C) All areas of unplanted and set-aside peatlands in the managed area (regardless of depth) are protected as "peatland conservation areas"; new drainage, road building and power lines by the unit of certification on peat soils is prohibited; peatlands are managed in accordance with the 'RSPO BMPs for Management and Rehabilitation of Natural Vegetation Associated with Oil Palm Cultivation on Peat', version 2 (2018) and associated audit guidance.</p> <p>- Critical (Major) compliance -</p>	Not Applicable. No peat soils were identified within OPG Bilala concession.	Not Applicable
Criterion 7.8: Practices maintain the quality and availability of surface and groundwater.			
7.8.1	<p>A water management plan is in place and implemented to promote more efficient use and continued availability of water sources and to avoid negative impacts on other users in the catchment. The plan addresses the following:</p> <p>a) The unit of certification does not restrict access to clean water or contribute to pollution of water used by communities.</p> <p>b) Workers have adequate access to clean water.</p> <p>- Minor compliance -</p>	<p>OPG Bilala has developed water management plans to promote more efficient use of water and to avoid negative impact on other users in the catchment.</p> <p>Water Management Plan (OPG Mouila LOT 1): Sustainable Water Management Plan – Mouila LOT 1 Plantation. Document No. MLA/CRS_WMP/0219, Revision 01, of December 2019. The water management plan has several management objectives, including: protection of human health, protection of water resources, sustainable use of water.</p> <p>FOR LOT 2:</p>	OFI

Criterion / Indicator	Assessment Findings	Compliance
	<p>OPG has developed a water management plan titled: Sustainable Water Management Plan Mouila LOT 2, dated December 2019. The plan mentions several management objectives including: protection of human health, protection of water resources, and sustainable use of water.</p> <p>Annex A of the plan sets parameters and frequency for drinking water testing.</p> <p>Some parameters are tested on a quarterly basis, such as: pH, turbidity, calcium, carbonates, nitrates, nitrites. Parameters such as faecal coliforms, Escherichia coli and faecal streptococci are tested monthly; while pesticides such as Finish 360 SL, Roundup, Bestup, Starane 200, Garlon 250 and Tamega are tested on an annual basis.</p> <p>Results of tests conducted on drinking water in Lot 1 were seen during the audit. Tests were conducted by Olam Lebamba Agricultural Services; Analytical Laboratory, Lebamba, BP 13559, Libreville, Gabon.</p> <p>For November 2023: Reference: Mo1-2-2023-11 Site: OPG Moila Lot 1-2 Date received: 8-Nov-2023 Number of Samples: 8 (including PK19, Mboukou (treatment WTP 1 & 2), Mandji. For each water treatment plant, samples were taken for raw water and treated water (tap water).</p> <p>For December 2023:</p>	

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Criterion / Indicator		Assessment Findings	Compliance
		<p>Reference: Mo1-2-2023-12 Site: OPG Moila Lot 1-2 Date received: 13-Dec-2023 Number of Samples: 8 (including PK19, Mboukou (treatment WTP 1 & 2), Mandji. For each water treatment plant, samples were taken for raw water and treated water (tap water)</p> <p>Against this background, OPG Bilala ensures that workers have adequate access to safe drinking water. However, interviews with workers revealed that water is not completely colourless. Whereas this poses no health risk as revealed from the water analyses cited above, OPG has ordered new water filters to help improve on the purification of water, hence an OFI is raised to monitor the situation.</p>	
7.8.2	<p>(C) Water courses and wetlands are protected, including maintaining and restoring appropriate riparian and other buffer zones in line with 'RSPO Manual on BMPs for the management and rehabilitation of riparian reserves' (April 2017). - Critical (Major) compliance -</p>	<p>Appendix B sets parameters and frequency for surface water testing. Physicochemical parameters (pH, turbidity, sulphates, nitrates, nitrites, etc.) are tested upstream and downstream three times a year. Toxic substances (arsenic, cadmium, mercury, lead, etc.) are tested twice a year; while pesticides (Finish 360 SL, Roundup, Bestup, Starane 200, etc.) are tested once a year.</p> <p>To enable this, OPG has developed a map to represent points where water samples are collected for testing as evidenced by: Localisation Points de Prelevement des Eaux de Surface – Mouila LOT 1; GIS-Drone Department /Olam Lebamba; Syst: WGS_1984_UTM_Zone_32S, Dated: 2/16/2023. For purposes of credibility, OPG Mouila has outsourced testing of surface waters to a third party. Results of tests conducted on surface waters were</p>	Complied

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		<p>seen at the time of the audit. Tests were conducted by Sol-Eau-Environnement Experts (SEENEX); BP 16415 Libreville, Gabon.</p> <p>Doubou River Upstream (S 01° 46’ 10.5’’ E 010° 54’ 35.9’’. Sample ref: 2023/0125. Samples collected 20 February, 2023; analyses on 6 March 2023. Report dated 3 April 2023.</p> <p>Doubou River Downstream (S 01° 44’ 55.9’’ E010° 57’ 50.0’’). Sample ref.: 2023/0124. Sample collected on 20/02/2023, analysed 6 march 2023 and report submitted on 21 April 2023.</p> <p>Rembo River Upstream (S01° 40’ 51.5’’ E010° 44’ 50.2’’). sample ref: 2023/0127, collected on 20/02/2023, tested on 6 march 2023, report submitted on 3 April 2023.</p> <p>Rembo River Downstream (02° 18’47.5’’ E011° 17’51.4’’). Sample ref 2023/0126, collected on 20/02/2023, tested on 6 march 2023 and reported on 3 April 2023.</p> <p>LOT 2:</p> <p>OPG maintains a a map with sampling points on the watercourses that run through its concession as evidenced by map titled: Point d’Eaux Mouila Lot 2, Projection : UTM WGS 84 Zone 32 S</p> <table><tr><th colspan="3">Point d’Eaux Lot 2</th></tr><tr><td>No Pts</td><td>X</td><td>Y</td></tr></table>	Point d’Eaux Lot 2			No Pts	X	Y	
Point d’Eaux Lot 2									
No Pts	X	Y							

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		1	10,447407	-1,70722	
		2	10,52327	-1,57957	
		3	10,532828	-1,521703	
		4	10,500144	-1,516386	
		<p>Points sampled during field visits as part of the audit matched the points indicated on the map and as represented above</p> <p>Surface water testing results were seen at the time of the audit. Conducted by: Sol-Eau-Environnement Experts, B.P. 16415 Libreville, Gabon.</p> <p>Dissouva Upstream Sample number : 2023/0132 (S01° 34' 47.0 ; E 10° 31'22.4", collected on 22/02/2023, analysed on 6 March 2023 and report submitted on 3 April 2023</p> <p>Dissouva Downstream Sample No. 2023/0130 (X= 10.532828, Y=-1.521703), collected on 22/02/2023, analysed on 6 March 2023 and report dated 3 April 2023.</p> <p>Ovingui Upstream</p>			

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Criterion / Indicator		Assessment Findings	Compliance
		<p>Sample No. 2023/0128 (S 01° 42' 18.2" E010° 26' 52.7"), collected on 22/02/2023, tested on 5 March 2023 and report dated 3 April 2023.</p> <p>Ovingui Downstream</p> <p>Sample No. 2023/0178 (S 01° 30' 59.5" E010° 30' 01.5"), collected on 5 March 2023, tested on 26/02/2023, with report dated 3 April 2023.</p>	
7.8.3	<p>Mill effluent is treated to be in compliance with national regulations. Discharge quality of mill effluent, especially Biochemical Oxygen Demand (BOD), is regularly monitored.</p> <p>- Minor compliance -</p>	<p>Annex C sets out parameters and frequency for POME testing. Physico-chemical parameters (pH, turbidity, temperature, BOD, COD, total Hydrocarbon) are tested on a quarterly basis; while toxic substances (arsenic, cadmium, chromium, nickel and lead) are tested on a quarterly basis.</p> <p>OPG Bilala Mill is fitted with biological HRT-based POME treatment plant consisting of one cooling pond, one acidification pond, four anaerobic ponds, , 2 aeration ponds and one stabilization pond for BOD reduction of 40,000 ppm to below 5000ppm for the land application process.</p> <p>POME testing is done by SEENEX. Report dated April 2023 was seen during the audit, titled:</p> <p>Compte Rendu de la Campagne de Prelevements et d'Analyses des Eaux de Rejets des Sites Olam Awala Kango, Bilala et Dola.</p> <p>Samples collected from 19 February to 4th March 2023.</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance
		<p>BOD mg/L O₂: 270, OLAM limits for field application (5000); Gabon national limit for discharge into the natural environment (20mg/L O₂).</p> <p>COD mg/L: 588 (Olam limit for field application 10200); Gabon national limit for discharge into natural environment: 30</p>	
7.8.4	<p>Mill water use per tonne of FFB is monitored and recorded.</p> <p>- Minor compliance -</p>	<p>The OPG Bilala Mill operates at a throughput of 90MT/Hr for ca. 6-8 hours daily, and based on availability of FFB.</p> <p>FFB processing data (FFB processed/MT, CPO volume/MT, CPKO volume/MT, PK volume/MT, OER/%, PKOER/%, KER/%, CPO FFA/%, PKO FFA/%, Mill Throughput/MT/hr, Oil Losses, Loose Fruit/%, Unripe/%, Total FFB Processed/MT, Mill Utilization/%, and water) for 2023 were seen during the audit.</p>	Complied
Criterion 7.9: Efficiency of fossil fuel use and the use of renewable energy is optimised			
7.9.1	<p>A plan for improving efficiency of the use of fossil fuels and to optimise renewable energy is in place, monitored and reported.</p> <p>- Minor compliance -</p>	<p>OPG Bilala plan for improving efficiency of use fossil fuels and to optimise renewable energy is integrated into the OPG Bilala Continuous Improvement Plan. The aspects monitored include and reported:</p> <ul style="list-style-type: none"> • Monitoring of total fibre & shell use / MT of CPO • Monitoring of direct fossil fuel used / MT of FFB or CPO • Fuel allocation quota is determined to all vehicles based on travel distances • Renewable energy use i.e. methane capture is planned <p>OPG Bilala records energy consumption date in daily log sheets and further summarises into monthly reports. The monthly reports were seen during the audit.</p>	Complied

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Criterion 7.10: Plans to reduce pollution and emissions, including greenhouse gases (GHG), are developed, implemented and monitored and new developments are designed to minimise GHG emissions.			
7.10.1	(C) GHG emissions are identified and assessed for the unit of certification. Plans to reduce or minimise them are implemented, monitored through the Palm GHG calculator and publicly reported. - Critical (Major) compliance -	<p>OPG Bilala has identified all its GHG sources and reports them publicly through Palm GHG. The 2022 Summary was seen at the time of the audit (Usine Olam Mouila Lot 1 Site Bilala Oil Mill – 2022 Summary). The summary includes, summary emissions, mill emissions credits, estate/plantation field emissions and sinks (own, group and 3rd party).</p> <p>Reduction of GHG is presented in the Continuous Improvement Plan (April 2019), and actions taken to reduce GHG emissions include implementation of quotas for use of vehicle fuels, and regular control/maintenance of vehicle engines to ensure efficiency. Additionally, interviews with the Sustainability Manager revealed that OPG has plans to set up a methane capture (i.e. biogas plant). There equally is use of fibre and cork at the mill for sterilization.</p>	Complied
7.10.2	(C) Starting 2014, the carbon stock of the proposed development area and major potential sources of emissions that may result directly from the development are estimated and a plan to minimise them prepared and implemented (following the RSPO GHG Assessment Procedure for New Development). - Critical (Major) compliance -	Planting was done in 2013 hence this indicator is not applicable.	Not Applicable
7.10.3	(C) Other significant pollutants are identified and plans to reduce or minimise them implemented and monitored. - Critical (Major) compliance -	OPG Bilala has identified other significant pollutants such as volatile Organic Compounds (VOCs), Carbon Monoxide (CO), Nitrogen Oxides (NOx), Carbon Dioxide CO ₂ , Sulphur Oxides (SOx), and Hydrogen Sulphides (HS). These are captured in the Social and Environmental Impacts Assessments of the Estates as well as that of the Bilala Mill.	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		Plans to reduce to reduce or minimise them are included in the Social and Environmental Management and Monitoring Plans. Measures include: maintenance of vehicles, trucks, heavy field equipment and generators to improve their efficiency and reduced emissions. The plans are monitored through the Annual reviews that are submitted to the Directorate General for Environment and Nature Protection (DGEPN) as demonstrated by reports.	
Criterion 7.11: Fire is not used for preparing land and is prevented in the managed area			
7.11.1	(C) Land for new planting or replanting is not prepared by burning. - Critical (Major) compliance -	According to Volume 1, Chapter 2, Section 2.5 of the OPG Agriculture Policy Manual, the use of fire for land preparation is strictly prohibited. Additionally, Olam Sustainable Palm Oil Policy, dated January 2018. Commitment 2 specifically commits to zero burning including no use of fire during land preparation planting or replanting. Additionally, Commitment 2 commits to no development on peatland regardless of depth, no deforestation of protected areas, no deforestation or conversion of high conservation value (HCV) forests and ecosystems; no deforestation or conversion of high carbon stock (HCS) forests.	Complied
7.11.2	The unit of certification establishes fire prevention and control measures for the areas directly managed by the unit of certification. - Minor compliance -	OPG Mouila has developed Plantation Fire Management Plan (Document DS-PRP.02, Issue 2, dated 28/03/2020); with the objective to provide guidance for the planning and management of the potential fire threat in palm and rubber plantation, palm oil mills, housing areas and adjoining communities.	Complied

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Criterion / Indicator		Assessment Findings	Compliance
7.11.3	The unit of certification engages with adjacent stakeholders on fire prevention and control measures. - Minor compliance -	<p>This establishes actions for OPG Bilala's fire management efforts.</p> <p>OPG engages with riparian communities on fire management and control measures as enshrined in OPG Procedure for Consultations and Communications on Fires in Savannah/Forests (Procédure de Consultation et de Communication et Sur les feux de Savane/Brousse. Rapport de la Campagne d'Explications and dated July 2023).</p> <p>This was further evidenced by minutes of meetings held with different communities on: 20 and 21 July 2023; and on 1, 2, 4, 9 and 14th August 2023 with Guiamba (21/07/2023), Moutambe Sane Fumou, Doubou (14/08/2023), Mboukou, Rembo (04/08/2023), Guidouma (01/08/2023), Sant-Martin (20/07/2023), Migabe (09/08/2023). The discussions were guided by the probable consequences of fires such as: loss of palms that could lead to the close of OLAM, pollution of the environment, and loss of jobs. Additionally, the social team seized the opportunity to raise issues related to hunting/poaching and fishing, customary user rights.</p> <p>For Lot 2: Villages reached include: Lambarene-Kili 19/07/2023), Fanguidaka (19/07/2023), Boungounga(20/07/2023), Bemboudie (20/07/2023), Diangui (26/07/2023), Kanana (26/07/2023), all with signed attendance sheets.</p>	Complied
Criterion 7.12: Land clearing does not cause deforestation or damage any area required to protect or enhance High Conservation Values (HCVs) or High Carbon Stock (HCS) forest. HCVs and HCS forests in the managed area are identified and protected or enhanced.			

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Criterion / Indicator		Assessment Findings	Compliance
7.12.1	<p>(C) Land clearing since November 2005 has not damaged primary forest or any area required to protect or enhance HCVs. Land clearing since 15 November 2018 has not damaged HCVs or HCS forests.</p> <p>A historic Land Use Change Analysis (LUCA) is conducted prior to any new land clearing, in accordance with the RSPO LUCA guidance document.</p> <p>- Critical (Major) compliance -</p>	<p>OPG conducted an independent HCV assessment titled: HCV Assessment Olam Palm Gabon, 35,354 Ha Concession North of Mouila, Final Version may 2012, conducted by Proforest, with Christopher Stewaart as Lead.</p> <p>The study identified 1.2 and 1.3, HCV 3, HCV 4.1, HCV 5 and HCV 6. The study proposed management options for all the different HCVs found.</p> <p>Moreover, no new plantings have been carried out by OPG in Mouila Lot 1 since 15 November 2018. All planted area has been subjected to the RSPO New Planting Procedure with public notification on the RSPO website.</p> <p>OPG conducted an HCV assessment for its LOT 2 plantations titled: HCV Assessment Olam Palm Gabon, Mouila Lot 2, covering 31,801 Ha Concession Northwest of Mandji Town, Ngounie Province, Gabon. Dated 2013. Conducted by Proforest, South Suite, Frewin Chambers, Frewin Court, Oxford OX1 3HZ, United Kingdom.</p> <p>Section 4.3 of the report is dedicated to stakeholder consultations including: riparian village communities, NGOs and national experts.</p>	Complied
7.12.2	<p>(C) HCVs, HCS forests and other conservation areas are identified as follows</p> <p>a) For existing plantations with an HCV assessment conducted by an RSPO-approved assessor and no new land clearing after 15 November 2018, the current HCV assessment of those plantations remains valid</p> <p>b) Any new land clearing (in existing plantations or new plantings) after 15 November 2018 is preceded by an HCV-HCS assessment, using the HCSA Toolkit and the HCV-HCSA Assessment Manual. This will include</p>	<p>There have been no new plantings Olam Palm Gabon Bilala certification unit after 15 November 2018. That notwithstanding, OPG conducted independent HCV assessments for its plantations at both Lot 1 and 2 as cited above in 7.12.1.</p>	Complied

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Criterion / Indicator		Assessment Findings	Compliance
	<p>stakeholder consultation and take into account wider landscape-level considerations.</p> <p>PROCEDURAL NOTE: For details of transitional measures, refer to Annex 5: RSPO transition from HCV assessments to HCV-HCSA assessments.</p> <p>- Critical (Major) compliance -</p>		
7.12.3	<p>In High Forest Cover Landscapes (HFCLs) within HFCCs, a specific procedure will apply for legacy cases and development by indigenous peoples and local communities with legal or customary rights, taking into consideration regional and national multi-stakeholder processes. Until this procedure is developed and endorsed, 7.12.2 applies.</p> <p>PROCEDURAL NOTE: There should be demonstrable benefits to the local community; clear recognition of legal and customary lands based on participatory land use planning; development should be proportional to the needs of the local community; with a balance between conservation and development. This procedure will also cover planting on previous or abandoned agricultural land / plantations. All other P&C requirements apply, including FPIC and HCV requirements.</p> <p>- Minor compliance -</p>	<p>OPG Bilala has not carried out in any new plantings in Mouila Lot 1 and 2 since 15 November 2018. All planted area has been subjected to the RSPO New Planting Procedure with public notification on the RSPO website.</p>	Complied
7.12.4	<p>(C) Where HCVs, HCS forests after 15 November 2018, peatland and other conservation areas have been identified, they are protected and/or enhanced. An integrated management plan to protect and/or enhance HCVs, HCS forests, peatland and other conservation areas is developed, implemented and adapted where necessary, and contains monitoring requirements. The integrated management plan is reviewed at least once every five years. The integrated management plan is developed in consultation with relevant stakeholders and includes the directly</p>	<p>Following the management recommendations from Proforest, OPG Bilala has developed a management plan that is implemented and monitored. The Management plan (Document No. 03/HCV PLAN/23, Of 06/2022, Titled Plan de Gestion des HVC, Olam palm Gabon Plantation Mouila Lot 1) was seen during the audit.</p> <p>OPG has developed a management plan for HCVs in Lot 2 titled: Plan de Gestion des HVC, Olam Palm Gabon, Plantation Mouila LOT 2. Document No. 01/HVC PLAN/06/20, revised in July 2021.</p>	Complied

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Criterion / Indicator	Assessment Findings	Compliance
<p>managed area and any relevant wider landscape level considerations (where these are identified).</p> <p>- Critical (Major) compliance -</p>	<p>Furthermore, OPG Bilala has mapped all HCVs in its Mouila LOT 2 plantation as demonstrated by: Repartition Spatial des Zones de Conservation de Mouila Lot 2. Projection : UTM WGS 84 Zone 32 S : Source Lidar Data, Prepared By: OPG Cartography. Which shows all the HCVs according to type.</p> <p>The plan outlines actions to be carried out in order to manage different HCV types identified such as: joint patrols with forestry authority, digging of trenches along and around HCV zones, maintenance of buffer zones, training of sprayers and fertilizer applicators, delimitation and maintenance of subsistence zones for local communities.</p> <p>OPG has developed a colour coding system for placards to mark HCVs equally sensitizes its workforce on HCV as evidenced by sensitization report dated 7 June 2023.</p> <p>Colour Yellow: Forests Colour Red: Sacred Sites Colour Blue: Permanent and temporary watercourse</p> <p>OPG implements and monitors the plan and reports through its monthly SMART reports. All SMART reports from January to December 2023 were seen during the audit.</p> <p>September: SMART monthly report Mouila LOT 2, October 2023 (No. 11.2023) October: Rapport Mensuel SMART LOT 2, Periode Novembre (No. 011/2023)</p>	

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Criterion / Indicator		Assessment Findings	Compliance
		December: Rapport Mensuel SMART Mouila LOT 2, Periode Decembre (No. 012/2023). The report outlines observations such as animal sightings and the protection class of the animals sighted such elephants, gorillas, panthers. Additionally the HVC team conducts elephants patrols to check routes that elephants use to encroach into the plantation.	
7.12.5	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. - Minor compliance -	<p>The HCV assessment conducted by Proforest and previously cited, identified social HCVs including HCV 5 and HCV 6. The HCV management plan shows that different stakeholders including local communities were duly consulted. Consultations with communities as well as government officials during the period of the audit confirmed that they were consulted during the HCV assessment and the development of the HCV management plan. Additionally, communities confirmed that OPG does not prevent them from accessing the social HCVs identified.</p> <p>OPG organises meetings with riparian communities and with its workforce on usage rights as well as hunting and fishing practices in the professional milieu. Captured in Minutes of meetings ref M-GSI-EN01, issue 1, of march 208. The attendance record (list of participants) was captured in Doc. Ref. M-GSI.02, issue 1, of 01/04/2016) meetings dated 17/03/2023, covering a total of 43 staffs divided into 3 groups.</p> <p>Training in how to behave in case of confrontation with a wild animal, training dated 19/12/2023, covering 36 workers in Lot 1, estate 1.</p>	Complied

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Criterion / Indicator	Assessment Findings	Compliance
	<p>OPG conducts joint missions with the administration in charge of forests to sensitize communities on hunting practices as evidenced by:</p> <p>Compte Rendu de la Mission Conjointe de Sensibilisation du 25 au 27 Juillet 2023. Report No. 48/MEFMEPCPAT/SG/DGF/DPEFWN/CEFM dated 23 July 2023. Communities included : Bemboudie, Boungounga, Fanguindaka, Lambarene Kili, Kanana, Diangui; with signed attendance sheets. The themes covered included:</p> <ul style="list-style-type: none"> • No wire traps within the concession • No hunting of protected species • No hunting during work hours • Number of animals that can be hunted per day/not more than four, etc.... <p>Sensitization of Olam Workforce and sub-contractor workers:</p> <p>Rapport de Sensibilisation sur le reglement en matiere des droits et usages coutumiers sur les sites OPG et les pratiques de chasse et peche en milieu professionnel</p> <p>Dated : 16/06/2023 Dated 15-16/03/2023</p> <p>LOT 1 :</p> <p>Rapport de Mission de Sensibilisation, Lute Anti-Braconnage et police Forestiere dans la Plantation de la Societe Olam Palm Gabon Mouila Lot 1. Dated : September 2023.</p>	

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Criterion / Indicator		Assessment Findings	Compliance
		Communities : Yamba, Mutambe Sane Fumu, Doubou, Guidouma, Rembo, Mboukou, Plaine Mabanga. Issues discussed : illicit hunting, illicit fishing	
7.12.6	<p>All rare, threatened or endangered (RTE) species are protected, whether or not they are identified in an HCV assessment.</p> <p>A programme to regularly educate the workforce about the status of RTE species is in place. Appropriate disciplinary measures are taken and documented in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect, trade, possess or kill these species.</p> <p>- Minor compliance -</p>	<p>To ensure that all rare, threatened or endangered (RTE) species are protected, OPG Bilala has put in a place and HCV monitoring team and installed camera traps. As means of verification instruments such as monitoring reports and SMART, sentizatin reports, are used as evidenced by</p> <ul style="list-style-type: none"> • Monthly SMART Report (OPG Lot 1) period October 2023 (No. 10/2023; • Period November No. 11/2023; <p>According to the reports 3 means of transport are used for field visits. 25Km were covered by foot, 40Km by motorbike and 301.5Km by vehicle in October. Over 200 sightings of wildlife species were recorded in October 2023. Including gorillas, elephants, chimpanzees, pythons, tortoise, and buffalo spp.</p> <p>Other reports seen during the audit include: Camera Trap Capture of Chimpanzee, Estate 5- Mouila Lot 1 (LIDAR Data, Projection UTM WGS 84 Zone 32 s) of November 15, 2013), represents positions of camera traps, boundary pillars and HCV areas.</p> <p>Meanwhile, OPG Lot 1 Camera – Etude faune (GIS Remote Sensing Survey/ Olam Lebamba, Syst: WGS_1984_UTM_32S. show results</p>	Complied

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Criterion / Indicator		Assessment Findings	Compliance
		of monitoring with camera traps showing images captured of buffalo, an elephant, etc.).	
7.12.7	<p>The status of HCVs, HCS forests after 15 November 2018, other natural ecosystems, peatland conservation areas and RTE species is monitored. Outcomes of this monitoring are fed back into the management plan.</p> <p>- Minor compliance -</p>	<p>OPG Bilala monitors HCVs, and RTEs through the SMART application into which daily monitoring activities, including sighting of RTEs and other species are recorded, further synthesised into , monthly and annual reports.</p> <p>Camera traps are used for monitoring, results are collected twice a year in 3 months intervals (dry season and rainy season).</p> <p>Interviews with OPG HCV team revealed that these results are used to prepare and implement further monitoring plans and activities.</p> <p>Additionally, the joint monitoring visits organised with the forestry administration serve as a feedback mechanism to continually improve on the monitoring system.</p>	Complied
7.12.8	<p>(C) Where there has been land clearing without prior HCV assessment since November 2005, or without prior HCV- HCSA assessment since 15 November 2018, the Remediation and Compensation Procedure (RaCP) applies.</p> <p>- Critical (Major) compliance -</p>	<p>There has been no new plantings in OPG in Bilala Lot 1 and 2 since 15 November 2018. All planted area has been subjected to the RSPO New Planting Procedure with public notification on the RSPO website.</p>	Complied

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Appendix B: GHG Reporting Executive Summary

The GHG emissions that were produced in **2022** for **Olam Palm Gabon SA -Bilala Palm Oil Mill** and supply base was calculated using the PalmGHG Calculator version 4.0. The assessment team had verified the data input in the PalmGHG Calculator against operations records. PalmGHG Calculation Options selected 'Full version' and 'Exclude LUC Emission' calculation option is not applied. The records verified includes:

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

The summary of the Net GHG emitted in **2022** for **Bilala POM** and supply base are as following:

Emission per product	tCO ₂ e/tProduct
CPO	-3.39
PKO	-3.39

Extraction	%
OER	23.79
KER	3.61

Production	t/yr
FFB Process	238,598
CPO Produced	56,762.38
PKO Produced	8,618.95

Land Use	Ha
OP Planted Area	43,217.85
OP Planted on peat	0
Conservation (forested)	48,828
Conservation (non-forested)	10,514
Total	102,559.85

Summary of Field Emission and Sink

	Own Crop*		Group		3 rd Party		Total	
	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB
Emission								
Land Conversion	286,180.50	1.20	4.46	0.08	0	0	286184,96	1,28
CO ₂ Emission from fertilizer	17431.84	0.07	4.29	0.08	0	0	17436,13	0,15
NO ₂ Emission	8109.06	0.03	2.15	0.04	0	0	8111,21	0,07
Fuel Consumption	9809.71	0.04	1.31	0.02	0	0	9811,02	0,06
Peat Oxidation	0	0	0	0	0	0	0	0
Sink								
Crop Sequestration	-233,533.96	-0.98	-53.97	-0.96	0	0	-233587,93	-1,94
Conservation Sequestration	-352,415.44	-1.48	-24.99	-0.45	0	0	-352440,43	-1,93
Total	-264,418.29	-1.11	-66.75	-1.19	0	0	-264485,04	-2.31

*Note: Includes both estates and smallholders

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Summary of Mill Emission and Credit

	tCO ₂ e	tCO ₂ e/tFFB
Emission		
POME	42511.54	0.18
Fuel Consumption	554.33	0
Grid Electricity Utilization	0	0
Credit		
Export of Grid Electricity	0	0
Sales of PKS	0	0
Sales of EFB	0	0
Total	43065.87	0.18

Summary of Kernel Crusher Emission and Credit (if applicable)

Emissions	tCO ₂ e
PK from own mill	-29191.22
PK from other source	0
Fuel Consumptions	237.57
Total Crusher emissions	-28953.65

*This mill has no kernel crusher operation.

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

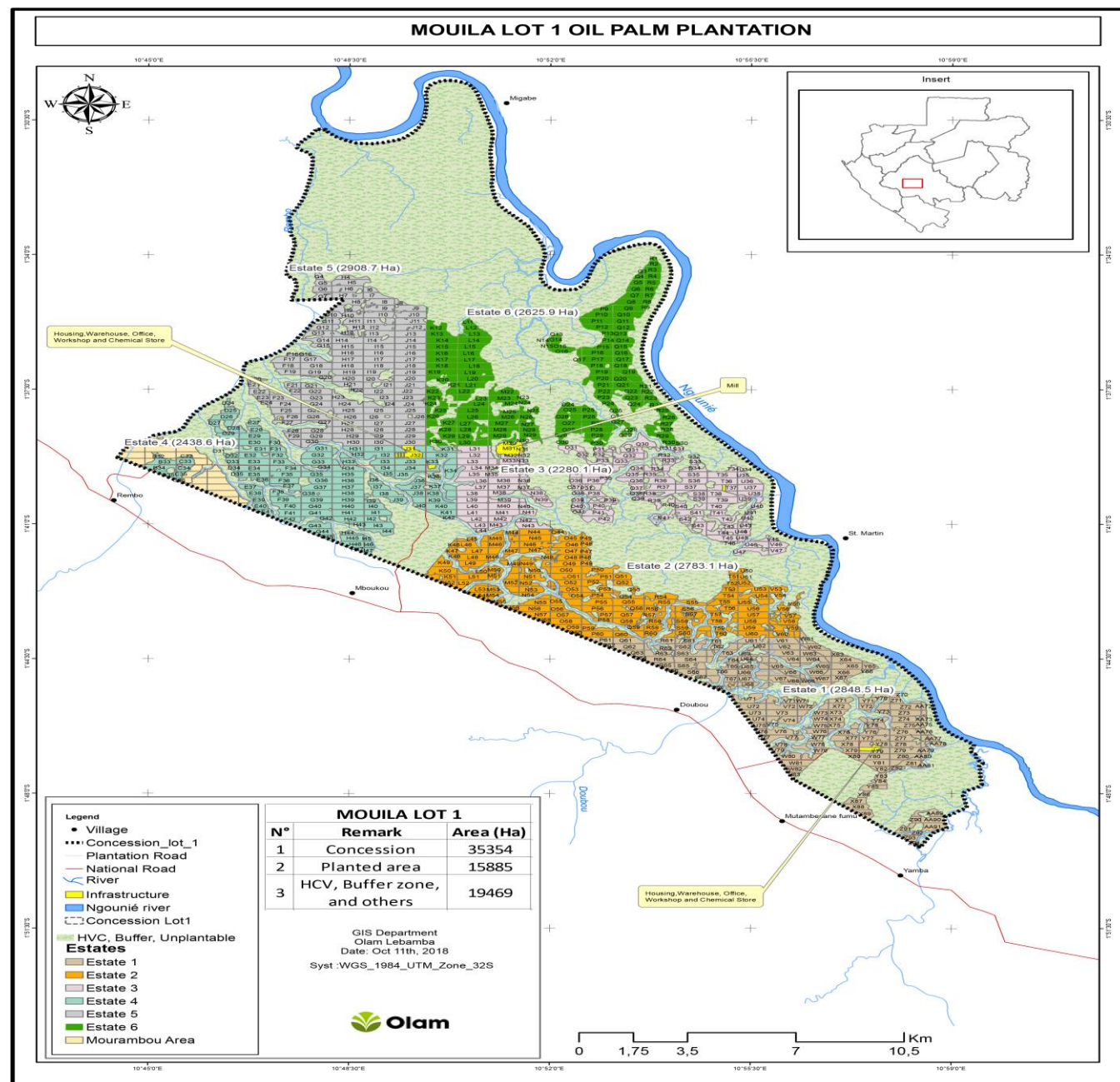
POME Diverted to Anaerobic Digestion:	
Divert to anaerobic pond (%)	100
Divert to methane captured (flaring) (%)	0
Divert to methane captured (energy generation) (%)	0

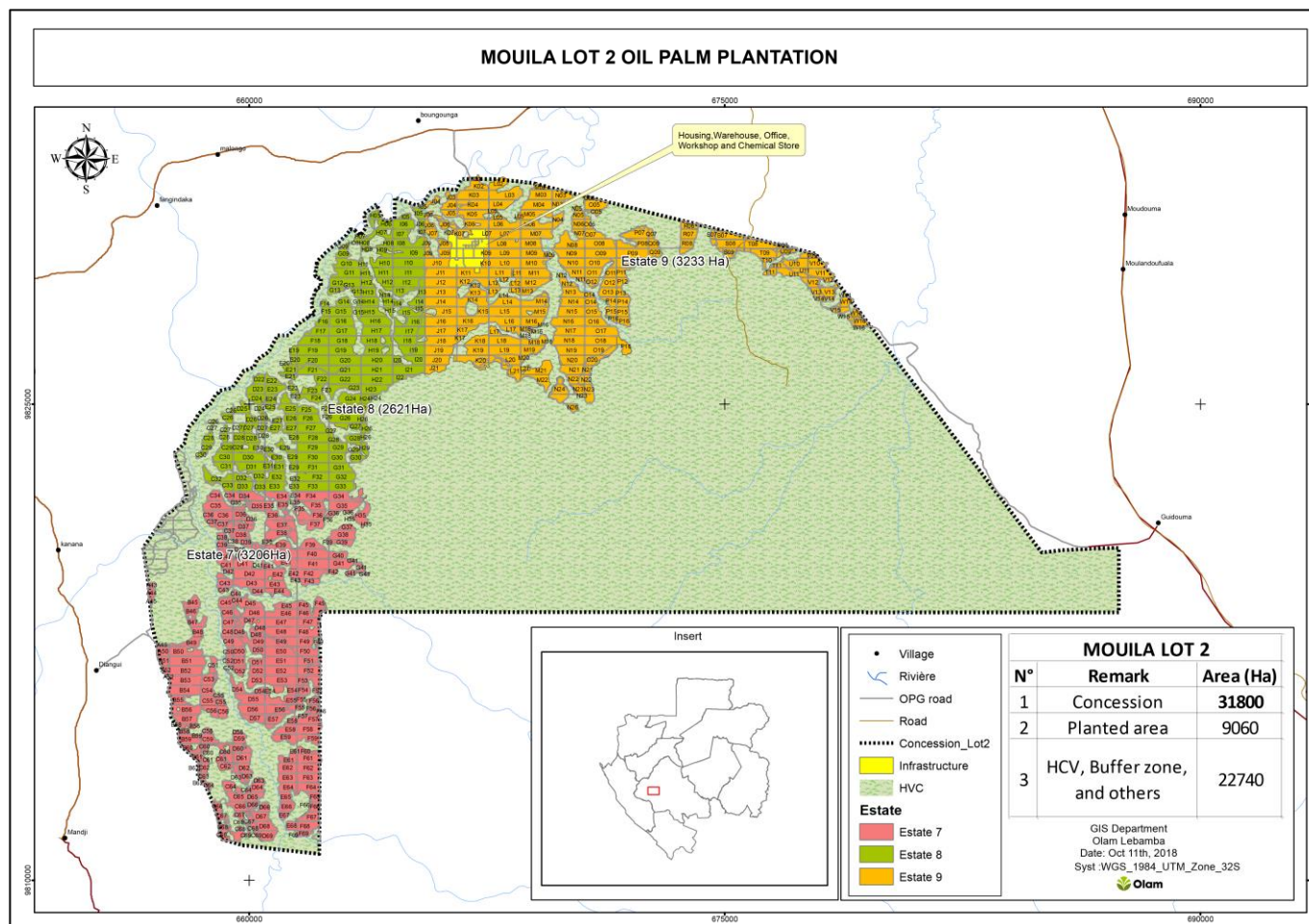
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Appendix C: Location Map of Certification Unit and Supply bases



Appendix D: Estate Field Map





Appendix E: List of Smallholder Registered and/or sampled-Not Applicable

Sampling Group	Current Certification	Scope Extension	Other: <i>Please specify</i>
Risk Factor Applied	Choose an item.	Choose an item.	Choose an item.
Justification of Risk Factor Applied			
Number of samples			
Remarks			

[illegible]

Appendix F: List of Abbreviations

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