

**RSPO PRINCIPLE AND CRITERIA  
PUBLIC SUMMARY REPORT**

**Initial Assessment**

**Annual Surveillance Assessment** (Choose an item.)

**Recertification Assessment** (Choose an item.)

**Extension of Scope**

<p><b>Client Company name (Parent Company):</b>  <b>Socfin SA</b></p>
<p>Client company Address  4 Avenue Guillaume 1650, Luxembourg</p>
<p>Certification Unit:    <b>Brabanta SA</b>  <b>Brabanta Palm Oil Mill</b>  Location of Certification Unit:  Mapangu, Territoire d'Ilebo, Kinshasa, Kasai, Democratic Republic of the  Congo</p>
<p>Date of Final Report:  05/04/2022</p>

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## Section 1: Scope of the Assessment

1. Company Details			
Parent Company	Socfin SA		
RSPO Membership Number	1-0269-19-000-00	Membership Approval Date	15 February 2019
Address	4 Avenue Guillaume, 1650, Luxembourg		
Palm Oil Mill / Group Manager / Estate (Certification Unit)	Brabanta SA Brabanta Palm Oil Mill		
Location / Address	Mapangu, Territoire d'Ilebo, Kinshasa, Kasai, Democratic Republic of the Congo		
Website	<a href="http://www.socfin.com">www.socfin.com</a>		
Management Representative	Pascal DESMEDT	E-mail	<a href="mailto:pdesmedt@brabantacd.com">pdesmedt@brabantacd.com</a>
Telephone	+243991006501	Facsimile	-

2. Certification Information			
Certificate Number	RSPO 753137	Certificate Start Date	05/04/2022
Date of First Certification	05/04/2022	Certificate Expiry Date	04/04/2027
Scope of Certification	Production of Palm Oil and Palm Kernel		
Visit Objectives	<p>The objective of Brabanta SA Initial Audit was to;</p> <ul style="list-style-type: none"> <li>• Confirm that the elements of the proposed scope of registration and the management system are conforming to the requirements of the assessment standard.</li> <li>• To confirm that the organization has effectively implemented and addressed the management system.</li> <li>• To confirm the ability of the management system is able to meet applicable statutory and regulatory, contractual requirements, organization policies and wherever are applicable and to identify areas for potential improvement of the management system.</li> </ul>		
Assessment Cycle	<input type="checkbox"/> Pre Assessment (Choose an item.) <input checked="" type="checkbox"/> Initial Assessment <input type="checkbox"/> Annual Surveillance Assessment (ASA Choose an item.) <input type="checkbox"/> Recertification Assessment (Choose an item.) <input type="checkbox"/> Scope Extension		
Applicable Standards / Normative Reference	RSPO Certification System for P&C and RSPO ISH 2020 <input checked="" type="checkbox"/> RSPO P&C 2018 for the Production of Sustainable Palm Oil <input type="checkbox"/> Choose an item. National Interpretation Choose an item. for RSPO P&C 2018 for the Production of Sustainable Palm Oil		
Supply Chain Module	<input type="checkbox"/> Identity Preserved; <input checked="" type="checkbox"/> Mass Balance	Mill Capacity	18 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		

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3. Other Certifications			
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
N/A	N/A	N/A	N/A

4. Location(s) of Mill & Supply Bases			
Name (Mill / Supply Base / Group Manager / Smallholders)	Location	GPS Coordinates	
		Latitude	Longitude
Brabanta Palm Oil Mill	Mapangu, territoire d'Ilebo, province de Kasai, DR Congo	04°22'36.11"S	20°17'22.95"E
Sanga Sanga Estate	Mapangu, territoire d'Ilebo, province de Kasai, DR Congo	04°20'45.76"S	20°12'12.79"E
Kadima Estate	Mapangu, territoire d'Ilebo, province de Kasai, DR Congo	04°22'58.14"S	20°13'38.76"E
Kanangai Estate	Mapangu, territoire d'Ilebo, province de Kasai, DR Congo	04°23'37.30"S	20°18'26.64"E

5. Description of Supply Base					
New Planting Development	<input checked="" type="checkbox"/> No (no change in total planted area)		<input type="checkbox"/> Yes (please refer to Principle 7 for details)		
Estate / Smallholders	Total Planted (Mature + Immature) (ha)	HCV (ha)	Infrastructure & Other (ha)	Total Area (ha)	% of Planted
Kanangai Estate	503	16.27	106.73	626	80%
Kadima Estate	320	0.39	2.61	323	99%
Sanga Sanga Estate	508	3.27	48.73	560	90.7%
<b>Total</b>	<b>1,331</b>	<b>19.93</b>	<b>158.07</b>	<b>1,509</b>	<b>88.2%</b>

6. Plantings & Cycle							
Estate / Smallholders	Age (Years)					Mature	Immature
	0 - 3	4 - 10	11 - 20	21 - 25	26 - 30		
Kanangai Estate	0	0	503	0	0	503	0
Kadima Estate	0	0	320	0	0	320	0
Sanga Sanga Estate	0	0	508	0	0	508	0
<b>Total (ha)</b>	<b>0</b>	<b>0</b>	<b>1,331</b>	<b>0</b>	<b>0</b>	<b>1,331</b>	<b>0</b>

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<b>7. Summary of Certified Tonnage of FFB (Own Certified Scope)</b>				
<b>Estate / Smallholders</b>	<b>Tonnage / year</b>			
	<b>Estimated last year (key in period)</b>	<b>Actual (key in period)</b>		<b>Forecast (Jan 2022- Dec 2022)</b>
		<i>Previous license period (key in period covered)</i>	<i>Current license period (key in period covered)</i>	
Kanangai Estate	N/A	N/A	N/A	8000
Kadima Estate	N/A	N/A	N/A	5000
Sanga Sanga Estate	N/A	N/A	N/A	8000
<b>Total</b>	<b>N/A</b>	<b>N/A</b>		<b>21,000</b>

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

<b>9. Summary of Non-Certified Tonnage of FFB (outside supplier – excluded from certificate)</b>				
<b>Out growers / smallholders</b>	<b>Tonnage / year</b>			
	<b>Estimated last year (key in period)</b>	<b>Actual (key in period)</b>		<b>Forecast (Jan 2022- Dec 2022)</b>
		<i>Previous license period (key in period covered)</i>	<i>Current license period (key in period covered)</i>	
Lumbundji	N/A	N/A	N/A	55,000
Savannah	N/A	N/A	N/A	4,000
Collecteurs villageois de FFB	N/A	N/A	N/A	1,883
<b>Total</b>	<b>N/A</b>	<b>N/A</b>		<b>60,883</b>

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

10. Summary of Certified Tonnage (not applicable for ISS)			
Estimated last year (key in period)	Actual (key in period)		Forecast (April 2022-March 2023)
	Previous license period (key in period covered)	Current license period (key in period covered)	
<b>FFB</b>	<b>FFB</b>		<b>FFB</b>
N/A	N/A	N/A	21,000 mt
<b>CPO (OER: N/A%)</b>	<b>CPO (OER: N/A%)</b>		<b>CPO (OER: 23%)</b>
N/A	N/A	N/A	4,830 mt
<b>PK (KER: N/A%)</b>	<b>PK (KER: N/A%)</b>		<b>PK (KER: 3.5%)</b>
N/A	N/A	N/A	735 mt

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

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

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

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

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

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

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

<b>13. Independent Smallholders Actual Sold Tonnage / Volume</b>						
	<b>FFB</b>	<b>FFB Conventional</b>	<b>FFB Other schemes</b>	<b>IS-CSPO</b>	<b>IS-CSPK</b>	<b>IS-CSPKE</b>
<b>Current License period (<i>key in period</i>)</b>						
<b>Credits</b>				N/A	N/A	N/A
<b>Physical</b>	N/A	N/A	N/A			



## Section 2: Assessment Process

### Certification Body:

BSI Services Malaysia Sdn. Bhd. (ASI Accreditation Number: ASI-ACC-067)  
Suite 29.01 Level 29, The Gardens North Tower,  
Mid Valley City, Lingkaran Syed Putra,  
59200 Kuala Lumpur, Malaysia.  
Tel +60 (3) 9212 9638 Fax +60 (3) 9212 9639  
Representative: Nicholas Cheong ([Nicholas.Cheong@bsigroup.com](mailto:Nicholas.Cheong@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 on **30<sup>th</sup> August to 02<sup>nd</sup> September 2021**. 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 on 27<sup>th</sup> July 2021.

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

The Critical NC close out on-site assessment was conducted on the **23<sup>rd</sup> December 2021**. 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. RSPO P&C 2018 for Production of Sustainable Palm Oil was used as the normative reference to assess compliance. The comments made by external stakeholders were also taken into account in the assessment.

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

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

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

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

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

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

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

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

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

**Tentative Date of Next Visit: December 26, 2022 - December 29, 2022**

**Total Number of Mandays: 20**

**2.2 BSI Assessment Team**

Name	Role	Competency
Dennis Acquah (DA)	Team Leader	<p><b>Education:</b> Holds a Bachelor of Science in Natural Resource management with specialization in Forestry from Kwame Nkrumah University of Science and technology, Kumasi, Ghana; Master of Science in logistic and Supply Chain Management from Kwame Nkrumah University of Science and technology, Kumasi, Ghana.</p> <p><b>Work Experience:</b> Currently work as a Project Coordinator (Forest and Biodiversity). Also experienced in implementing forest governance project, building relations, and sustaining communications with forest communities, acting as resource person for awareness and training activities and engaging government towards policy reforms. He has 14 years of experience as an Operation Managers having worked with two of the leading timber processing industries in Ghana.</p> <p><b>Training attended:</b> Successfully completed the RSPO P&amp;C 2018 Lead Auditor Course; RSPO SCCS Lead Auditor Course, SA 8000, ISO 9001, ISO 45001, FSC Forest management/CoC Lead Auditor Course, Rain Alliance Sustainable Agriculture Standard (RA SAS) Farm/CoC Lead Auditor Course. Have has also participated in ESIA and SEA trainings</p> <p><b>Aspect covered in this audit:</b> Occupational health and safety, operation procedure, organization commitments, legal compliance, long term economy plan, continuous improvement time bound plan, supply chain for mill</p> <p><b>Language proficiency:</b> English</p>
Joseph William Osei (JWO)	Team Member	<p><b>Education:</b> Holds a Bachelor of Science in Natural Resources Management from the Kwame Nkrumah University of Science and Technology, Kumasi, Ghana; Master</p>

		<p>of Science in Tropical Forestry with specialization in Forest Economics from the Technology University of Dresden, Germany and Master of Business Administration (MBA) in Strategic Management, from the Paris Graduate School of Management, Paris, France.</p> <p><b>Work Experience:</b> Natural Resources Manager with specialization in Forest Economics and more than 16 years' experience in forest plantation and natural forest management. Led and participated in over thirty Forest Management/Chain-of custody audits, Forest Carbon, FLEGT VPA and RSPO baseline assessment in over 8 countries in Africa.</p> <p><b>Training attended:</b> He is also an auditor for Health and Safety, Best Agriculture Practices, Environmental, and HCVs since March 2020.</p> <p>Successfully completed the RSPO P&amp;C 2018 Lead Auditor Course; FSC Lead Auditor Course; ISO 14001 Lead Auditor Course and other certification schemes including the UEFT, VCS.</p> <p><b>Aspect covered in this audit:</b> Occupational health and safety, operation procedure, impact assessments, , legal compliance, long term economy plan,</p> <p><b>Language proficiency:</b> English</p>
<p>John Manyitabot TAKANG (JMT)</p>	<p>Team Member</p>	<p><b>Education:</b> Holds a Bachelor of Science in Environmental and Resource Management and Master of Science in Environmental Sciences from the University of Cologne, specializing in environmental law and governance.</p> <p><b>Work Experience:</b> He was a Resident Scholar at the United Nations University's International Human Dimensions Programme on Global Environmental Change (UNU-IHDP) in Bonn-Germany. John has also served at the International Forest Policy Unit, in the Department of Natural Resources Governance and Climate Change of the German Technical Cooperation (GIZ). He was the Academic Officer of the International Master of Environmental Sciences (IMES) Programme at the University of Cologne, where he equally taught classes in international environmental law. Additionally, he has taught classes in international environmental law in the Technology and Resources Management master study programme offered at the Institute for Technology and Resources Management in the Tropics and Subtropics of Cologne University of Applied Sciences. John is involved in a number of governance initiatives. Among others, he is a Fellow of the African Good Governance Network (AGGN). Since 2011, he is founding Executive Director of the Environmental Governance Institute (EGI), where he is engaging in the conception and implementation of a wide range of projects including, policy, development, renewable energies, sustainable agriculture among other.</p> <p><b>Training attended:</b> Successfully completed the RSPO P&amp;C 2018 Lead Auditor Course, ISO 14001:2015 Lead Auditor Course (attended), RSPO Smallholder Academy (Partner to the Academy) and training in HCV/HCS.</p> <p><b>Aspect covered in this audit:</b> Best Management Practice for Mill and Estate, environment aspect, GHG &amp; HCV, continuous improvement</p> <p><b>Language proficiency:</b> French, English</p>
<p>Dr Suhaili Sahari</p>	<p>Peer Reviewer</p>	<p><b>Education:</b> Holds a Diploma in Science from University Technology Mara (UiTM), Malaysia; Bachelor of Science (Hons) in Chemistry with Industrial Chemistry from Liverpool University, England; Master in Business Administration (General) from University of Multimedia, Malaysia and PhD from University Science Islam Malaysia, Faculty of Economy and Muamalat - Management.</p> <p><b>Work Experience:</b> Worked with Hong Leong Group of Companies as a production executive cum TQM facilitator and continues to advance in his career as a manager</p>

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		<p>and senior manager in management, production, training and quality for more than 11 years. During his tenure with Hong Leong Group of Companies, he heavily involved in strategic management decision issues such as developing SWOT analysis, Vision, Mission, Business and Corporate Strategy formulation, Acquisition and restructuring strategies. Strategic actions and implementation etc. Then he joint Kumpulan Guthrie and Sime Darby Group of Companies for more than 7 years as a manager, heads of department and Assistant Vice President in management, quality and training. Part of his duty is to strategies the departmental vision; mission, critical success factors and action plan into actions and support the corporate strategic plan.</p> <p><b>Training attended:</b></p> <ol style="list-style-type: none"> <li>1. ISO 9001:2015 Lead Auditor and Internal Auditor</li> <li>2. Occupation Health and Safety Training</li> <li>3. ISO 14001:2015 Standard</li> <li>4. ASI Peer reviewer Training</li> <li>5. RSPO Standards: RSPO P&amp;C 2018 MY-NI 2019</li> <li>6. MSPO Standards: MS 2530: 2013 part 1, 2 , 3 and 4</li> <li>7. Problem Solving Technique: 8 D, ICC, QCC, Systematic PS</li> <li>8. HACCP MS 1480:2019</li> <li>9. GAP Standard: GLOBALG.A.P., Euro GAP</li> </ol>
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**Accompanying Persons:**

Name	Role
Aimé Fulgence (AFG)	Translator/ Technical Expert
Gueye Sarah MASSOLOU (SMG)	Translator
Phlippe Ndojoko (PN)	Translator
Valence Shem	Remote Observer
Mohamed Hidhir Abidin	Remote Observer
Hu Ning Sing	Remote Observer

**2.3 Assessment Plan**

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

Date	Time	Subjects	DA	JWO	JMT	AFG	SMG	PN
Wednesday 25/08/2021	All Day travel	Audit Team arrives in Kinshasa	√	√	√	√	√	
		Do PCR Tests	√	√	√	√	√	
Thursday 26/08/2021		Get PCR Tests Results	√	√	√	√	√	

Date	Time	Subjects	DA	JWO	JMT	AFG	SMG	PN
Friday 27/08/2021	Morning (Exact time TBD)	Team departs from Kinshasa to Mapangu (the plantation) in the morning, reaching the plantation around lunchtime	✓	✓	✓	✓	✓	
Saturday 28/08/2021		Rest Day for the Team	✓	✓	✓	✓	✓	
Sunday 29/08/2021		Rest Day for the Team	✓	✓	✓	✓	✓	
<b>DAY 1</b> Monday 30/08/2021	0800rs	Opening Meeting with Brabanta Management Team and staff to include:  Introductions, updates from Brabanta Management; review audit scope, Finalise audit plan, Any introduction and updates to RSPO and BSI standards and protocols.	✓	✓	✓	✓	✓	
	0900hrs	Mill Walk through and inspection: Workshops, Stores and POM application, Mill Safety and Health / PPE / Signage, Waste Management / Environment	✓	✓	✓	✓	✓	
	1000hrs to 1200hrs	<b>Document Review related to</b> Information and public availability, Communication and consultation (1.1), Commitment to ethical conduct (1.2), Human Rights (4.1), Complaints and Grievances systems (4.2), Contribution to local development (4.3), Land use & FPIC (4.4 & 4.5), Land Use: Compensation (4.6 & 4.7), Land Use: Conflict (4.8), Supply Chain (3.8), Training (3.7),	✓			✓		
		<b>Document Review related</b> Long term plan and economic viability (3.1), Continuous Improvement & Reporting – RSPO Metrics (3.2), 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)			✓			
		<b>Document Review related to</b> Legal compliance (2.1), Third party contractors legal (2.2), Third party FBB legally sourced (2.3), SOPs (3.3), SEIA and Plans (3.4), System for managing human resources (3.5), Occupational Health and Safety Plan (3.6), Improved SH livelihoods (5.1), SH Pay and working conditions (5.2), No discrimination (6.1), Staff and Workers Pay and working conditions (6.2), Freedom of association (6.3), No child labour (6.4), No harassment (6.5), No forced or trafficked labour 6.6, and Safe working environment 6.7		✓				✓

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Date	Time	Subjects	DA	JWO	JMT	AFG	SMG	PN
	1200hrs	Lunch	✓	✓	✓	✓	✓	
	1330hrs 1600hrs	Document Review continues	✓	✓	✓			
		<b>Stakeholder consultations-</b> <ul style="list-style-type: none"> <li>Administrator of territory,</li> <li>Kasai Province</li> <li>Communities</li> </ul>	✓			✓		✓
	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	✓	✓	✓	✓	✓	
<b>DAY 2</b> Tuesday 31/08/2021	0800hrs	<b>Field verification</b> <ul style="list-style-type: none"> <li>Best agricultural practices</li> <li>Manuring, Spraying, Harvesting</li> <li>HCV / Conservation Area</li> <li>Legal compliance / boundary</li> <li>Chemical / Pesticide / PPEs, Pesticide and Fertilizer Stores /Change rooms</li> <li>Workers interviews (including workers rights, issues, wages, conditions)</li> </ul>	✓	✓	✓	✓	✓	✓
	1200hrs	Lunch						
	1330hrs 1600hrs	<b>Document Review Continues</b>	✓	✓	✓	✓	✓	
		<b>Stakeholder consultations-</b> Workers Representative	✓			✓		
	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	✓	✓	✓	✓	✓	
<b>DAY 3</b> Wednesday 01/09/2021	0800hrs	<b>Field verification</b> <ul style="list-style-type: none"> <li>Best agricultural practices</li> <li>Soil management, Spraying, Harvesting</li> <li>HCV / Conservation Area</li> <li>Legal compliance / boundary</li> <li>Chemical / Pesticide / PPEs, Pesticide and Fertilizer Stores /Change rooms</li> <li>Workers interviews (including workers' rights, issues, wages, conditions)</li> </ul>	✓	✓	✓	✓	✓	✓

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Date	Time	Subjects	DA	JWO	JMT	AFG	SMG	PN	
	1200hrs	Lunch							
	1330hrs 1600hrs	<ul style="list-style-type: none"> <li>• POME treatment and Waste sites and</li> <li>• Clinic</li> <li>Supply Chain for the POM (3.8)</li> <li>• Demonstration of legal entity</li> <li>• Roles and responsibility and ICS</li> <li>• Procedures/manual/SOP</li> <li>• Record of purchase –</li> <li>• Record of sales–</li> <li>• RSPO rules on market communication and claims</li> </ul> <p><b>Stakeholder consultations-</b>            Gender Committee            Head of Sector, Mapangu</p>	✓ ✓	✓	✓	✓ ✓	✓		
	1600hrs to 1630hrs	Audit Team Meets to consolidate day's findings	✓	✓	✓	✓	✓		
	1630hr to 1700hrs	Debriefing of days findings to Management and ends days' work	✓	✓	✓	✓	✓		
<b>DAY 4</b> Thursday 02/09/2021	0800hrs  Kanangai Estate	<p><b>Field verification</b></p> <ul style="list-style-type: none"> <li>• Best agricultural practices</li> <li>• Soil management, Spraying, Harvesting</li> <li>• HCV / Conservation Area</li> <li>• Legal compliance / boundary</li> <li>• Chemical / Pesticide / PPEs, Pesticide and Fertilizer Stores /Change rooms</li> <li>• Workers interviews (including workers' rights, issues, wages, conditions)</li> </ul>	✓ ✓	✓ ✓	✓ ✓	✓ ✓	✓ ✓	✓	
	1200hrs	Lunch							
	1330hrs to 1600hrs	<p><b>Closing Meeting Preparation:</b></p> Auditors consolidate notes and confirm audit findings	✓	✓	✓	✓	✓		
	1600hrs to 1700hrs	<p><b>Closing Meeting and Review of Findings:</b></p> Convene with all relevant staff to summarize audit findings, potential non-conformities and next steps	✓	✓	✓	✓	✓		
Friday 03/09/2021		Audit Team departs from Mapangu to Kinshasa	✓	✓	✓	✓	✓		

### 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?	Socfin SA has a time-bound plan to achieve RSPO certification for all its management units. Reference is being made to page 18, <i>Approved Time Bound Plan</i> (TBP) table. The TPB as sighted and reviewed has the list of all estates and mills registered under Socfin SA	Complied.
Have all the estates and mills certified within five (5) years after obtaining RSPO membership?	PT Socfindo has been an active members of RSPO since 7 December 2004. Since 15 February 2019, Socfin S.A. became a member of RSPO, grouping all Indonesian and African oil palm operations under one membership number. The parent company kept the membership date of Socfindo PT due Article 5.6 – (i) of the RSPO Membership Rule 2016  Socfin SA has set a time bound plan for the certification of all its management units in line with the requirement of RSPO. Currently 16 units has been certified and the remaining 14 units are at various stages of been certified within the approved timeframe of 5 years	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.	A time bound plan exist for the certification of all the management unit within the approved period	Complied
Any deviations from the maximum periods requires approval by the RSPO Secretariat.	There are no evidence of deviations from the maximum period  Per the time bound plan reviewed, 17 mills and estates are yet to be certified and are within the set time frame.	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 Time Bound Plan. This is their certification audit and is consistent with the ACOP reporting	Complied
Have there been any isolated lapses in implementation of the plan? If yes a <b>Minor</b> non-compliance shall be raised	There are no isolated lapses in 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 <b>Major</b> non-compliance shall be raised	There are no evidence of fundamental failures to proceed with the implementation of the plan.	Complied
<b>Un-Certified Units or Holdings</b>		



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<p>No replacement of primary forest or any area required to maintain or enhance HCVs and HCS in accordance with RSPO P&amp;C criterion 7.12.</p>	<p>There has not been any clearing of primary forest since the units became members of RSPO in February 2019. All the units have completed HCV assessments. Land Use Change Analysis (LUCA) has been done and where required, RaCP will be done</p>	<p>Complied</p>
<p>Any new plantings since January 1<sup>st</sup> 2010 shall comply with the RSPO New Plantings Procedure.</p>	<p>The company has not undertaken any new plantings. All Socfin SA subsidiaries in Africa have only been members since 15 February 2019.</p>	<p>Complied</p>
<p>Any Land conflicts are being resolved through a mutually agreed process, such as RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO P&amp;C criteria 4.4, 4.5, 4.6, 4.7 and 4.8.</p>	<p>Review of internal assessment reports and other documents demonstrate the units has legal rights to the use of land for their operations. Other documents also shows engagements between the various management units with relevant stakeholders to ensure issues are resolved in a participatory manner.</p>	<p>Complied</p>
<p>Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&amp;C criterion 4.2</p>	<p>Review of internal assessment reports shows there are mechanisms in place for addressing labour disputes. Reviewed records of training on the procedures to relevant stakeholders.</p>	<p>Complied</p>
<p>Any Legal non- compliance is being addressed through measures consistent with the requirements of RSPO P&amp;C criteria 2.1</p>	<p>Identified cases of legal non-compliance during internal assessments has been closed at the time of this audit.</p>	<p>Complied</p>
<p>Did the company conduct internal audit for those uncertified estates against the uncertified management units requirement and covering the RSPO P&amp;C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12? If yes, a positive assurance statement shall be available and justified.</p>	<p>The unit of certification has conducted internal audits for all its uncertified management units. The audit were conducted by the company's sustainability teams and also by RSPO Certification Body. The reports were seen and reviewed by the audit team. All identified non conformities have been addressed.</p> <p>The company gave a positive assurance statement as "Internal audits are, at our level, tools for continuous improvement. We have opted for a simple presentation of the discrepancies found during the audit. Positive statements provided by the auditors are included in the presentation of the internal and external audits findings inside the annual management review".</p>	<p>Complied</p>
<p>Are there any Critical (Major) non-compliance raised against any of the RSPO P&amp;C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12 during the last internal audit of the uncertified estates? If yes is the NC(s) actively addressed with RSPO?</p>	<p>Review of the internal assessments of the various management units did not identify any pending issues.</p>	<p>Complied</p>
<p>Have there been any stakeholder (including NGO) consultation conducted?</p>	<p>Relevant stakeholders have been consulted as part of Brabanta HCV studies and during the company's certification assessment</p>	<p>Complied</p>

**3.2 Progress of scheme smallholders and/or outgrowers**

<b>Progress of scheme smallholders or outgrowers towards compliance with relevant standards</b>		
<b>Requirement</b>	<b>Remarks</b>	<b>Compliance</b>
<p>Has 100% of scheme smallholders and/or scheme outgrowers comply with the standard within three years of the mill's initial certification?</p> <p>OFI shall be raised if after one year where 100% of the scheme smallholders and scheme outgrowers are not in compliance, a minor NC after two years, and a major NC if this requirement is not met after three years.</p>	<p>Brabanta does not have scheme smallholders or outgrowers in their operations. The company take wild fruit from the communities.</p> <p>However per the Time Bound Plan, Socapalm Eseka (Scheme Smallholders) is scheduled for certification in 2023</p>	<p>Complied</p>

**Approved Time Bound Plan**

No.	Name of Mill and Estate(s)	TBP for Certification	Status to date	Any unresolved conflict (land dispute, labour dispute, legal non-compliance)
1	SAC (Mill and Estate)-Serra Leone	2020	Certified	None
2	Agripalma (Mill and MU: TF 409)-Sao Tome	2021	Certified	None
3	Socapalm Mbongo (Mill and Estate)-Cameroon	2021	Certified	None
4	Socapalm Mbambou (Mill and Estate)-Cameroon	2021	Audited	None
5	Brabanta (Mill and MUs: Sanga Sanga, Kadima, Kanangai)	2021	Audited	None
6	Socapalm Edea (Mill and Estate)	2021	Audited	None
7	Socapalm Kienke (Mill and Estate)	2022	To be Audited (LUCA approved on the 22/12/2021)	None
8	Socapalm Dibombari (Mill and Estate)	2021	Audited	None
9	PSG (Mill and MU: Manso)	2022	To be Audited	None
10	Okomu (Estate: Extension 1)	2022	To be Audited (LUCA approved)	None
11	Okomu (Estate: Extension 2)	2022	To be Audited (LUCA submitted on 3/12/2021, currently addressing comments raised by RSPO)	None
12	Safacam (MUs: TF151, Provisional Concession)	2022	To be Audited (Annex 7 validated on the 16 <sup>th</sup> of August 2021)	None
13	SOGB (MUs: TF465, TF466, TF467)	2022	To be Audited (working on the Annex 8 Remediation Plan)	None
14	Agripalma (MU: Titulo 410)	2022	To be Audited (waiting approval of LUCA)	None

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15	Brabanta (MUs: Savannah, Lumbundji)	2022	To be Audited (waiting approval of LUCA)	None
16	PSG (MU: Subri)	2022	To be Audited (Finalising the LUCA)	None
17	Socapalm Eseka (Scheme Smallholders)	2023	To be Audited	None
18	PT Socfin Indonesia - Tanah Gambus (Mill and Estate)	2011	Certified	N/A
19	PT Socfin Indonesia - Bangun Bandar (Mill and Estate)	2011	Certified	N/A
20	PT Socfin Indonesia - Negeri Lama (Mill and Estate)	2014	Certified	N/A
21	PT Socfin Indonesia - Mata Pao (Mill and Estate)	2014	Certified	N/A
22	PT Socfin Indonesia - Sungai Liput (Mill and Estate)	2014	Certified	N/A
23	PT Socfin Indonesia - Aek Loba (Mill and Estate)	2015	Certified	N/A
24	PT Socfin Indonesia – Seumanyam (Mill and Estate)	2015	Certified	N/A
25	PT Socfin Indonesia – Seunagan (Mill and Estate)	2015	Certified	N/A
26	PT Socfin Indonesia - Lae Butar (Mill and Estate)	2015	Certified	N/A
27	Okomu (Mill and Estate: Okomu Main Estate)	2020	Certified	N/A
28	Safacam (Mill and MUs: TF129, TF136, TF180, Bail Ossa)	2020	Certified	N/A
29	SOGB (Mill and MU: TF464)	2021	Certified	N/A
30	Socapalm Eséka (Mill)	2021	Certified	N/A

### 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 15 Critical; 14 Minor nonconformities and 5 Opportunity For Improvement raised. The Brabanta SA - Brabanta Palm Oil Mill Certification unit submitted Corrective Action Plans for the nonconformity. Corrective action plans with respect to the nonconformity was reviewed by the BSI audit team and accepted.

The implementation of the corrective action plans to address the minor nonconformity will be followed up during the next surveillance assessment. The implementation of the Corrective Actions for the Critical 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			
<b>NCR Ref #</b>	2111113-202108-M1	<b>Date Issued</b>	03/09/2021
<b>Due Date</b>	02/09/2022	<b>Date of nonconformity Closure</b>	23/12/2021
<b>Clause &amp; Category (Critical / Minor)</b>	Indicator 3.6.1 (Critical)		
<b>Statement of Nonconformity:</b>	Brabanta does not have a documented risk assessment report in place.		
<b>Requirement Reference:</b>	All operations are risk assessed to identify H&S issues. Mitigation plans and procedures are documented and implemented.		
<b>Objective Evidence:</b>	<p>Brabanta has not assessed the risk of all of its operations. Consequently, mitigation plans have not been documented and implemented for all risks associated with its operations. The company has HSE policy and HSE procedures for risk assessment (Procedure d'analyse des risques au travail of 16/11/2017, Revision 00). The company have had training in risk assessment and in the process of completing its risk assessment using the participatory approach. The company's risk assessment therefore is not yet completed and there are a number of risk areas expressed by workers which are currently not identified for mitigation actions. For example,</p> <ol style="list-style-type: none"> <li>1. Harvesters in all visited sites complained of lack of body protection without uniforms though section 4 (Equipements De Protection Individuelle) of the company's procedures – "Procedure d'accueil HSE of 28/06/2016 Revision 00) indicates to use uniform for body protection,</li> <li>2. The CPO storage tanks at the mill have no retention wall (though the company has plans and a budget to construct a retention wall),</li> </ol>		
<b>Corrections:</b>	<ol style="list-style-type: none"> <li>1. Finalizing the ongoing risk assessment by using the participatory approach</li> <li>2. Integrate workers' observations</li> <li>3. Have third party/expert verification done</li> <li>4. Have the results validated by management</li> <li>5. Disseminate to all staff</li> <li>6. Implement the agreed actions (purchase of PPE, training, awareness raising, etc.)</li> <li>7. Relocate the fuel station (planned in the 2021 budget)</li> <li>8. Construction of CPO tank storage facilities (planned in the 2021 budget)</li> <li>9. Carry out monitoring and evaluations</li> </ol>		

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	10. Annual review of analyses
<b>Root Cause Analysis:</b>	Risk assessment and analysis training took place in May 2021. This training was delayed due to international restrictions related to the Covid-19 pandemic. Due to these delays, the risk assessment was not finalized on the day of the audit.
<b>Corrective Actions:</b>	<ol style="list-style-type: none"> <li>1. A draft risk assessment has been sent to the Earthworm Foundation</li> <li>2. Earthworm Foundation returned the table with some comments and suggestions</li> <li>3. A meeting of the HSE committee in a special committee was organized with a few workers to harmonize the risk assessment table.</li> <li>4. An HSE Committee was organized on 08/10/2021. A plan was discussed to receive feedback from workers regarding their views on safety in the field. This information will be collected by the sub-committee and discussed at monthly meeting at the Health and Safety at work.</li> <li>5. The risk assessment table is ready, there are still some adjustments suggested by EF</li> <li>6. As soon as the adjustments are made the table will be sent again to EF for a final touch-up</li> <li>7. Construction work on the CPO tanks is underway</li> </ol>
<b>Assessment Conclusion:</b>	<ol style="list-style-type: none"> <li>1. Reviewed a risk assessment that covers various activities of the company's operations including workshop, plantations and office.</li> <li>2. Reviewed minutes of meeting between the Health and Safety manager with the HSE committee on the 8/10/2021. The Purpose of the meeting was "Reorganisation of the HSE Committee". The meeting was attended by 14 members.</li> <li>3. Reviewed minutes of meeting between the HSE committee and the workers on the 16/12/2021. The purpose of the meeting was on Feedback from the Non Conformities, Strength, Weakness and Expectations and attended by 22 workers. Some of the feedback from the workers include cleanliness of the environment which result in diseases, Insufficient water for the housing, risk to house from collapse due to the use of sand as building material.</li> <li>4. Also during a field visit to the mill it was observed that a retention wall has been constructed around the CPO tank</li> </ol> <p>Based on the evidences reviewed the NC is closed</p>

Non-conformity			
<b>NCR Ref #</b>	2111113-202108-M2	<b>Date Issued</b>	03/09/2021
<b>Due Date</b>	02/09/2022	<b>Date of nonconformity Closure</b>	23/12/2021
<b>Clause &amp; Category (Critical / Minor)</b>	Indicator 3.6.2 (Critical)		
<b>Statement of Nonconformity:</b>	The systems to monitor the effectiveness of the H&S plan are not completed		
<b>Requirement Reference:</b>	The effectiveness of the H&S plan to address health and safety risks to people is monitored		

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<b>Objective Evidence:</b>	Brabanta has a Health and Safety plan with timelines which is distributed. A health and safety committee has been put in place who will be meeting every month to deal with health and safety plan implementation effectiveness. However, these are all work in progress as the risk assessment is yet to be completed, the health and safety plan to be updated and the HSE committee is yet to start its work
<b>Corrections:</b>	<ol style="list-style-type: none"> <li>1. Convene the first meeting of the Health and Safety Committee</li> <li>2. Identify and explain the roles and duties of the committee members</li> <li>3. Formalise the health and safety committee</li> <li>4. Create an agenda</li> <li>5. Schedule meeting dates</li> </ol>
<b>Root Cause Analysis:</b>	Risk assessment training was finalised in May 2021, which forms the basis of the health and safety plan. This was delayed due to Covid-19 restrictions. As a result of this delay, the creation of the policy, plan and committee was finalised in August 2021.
<b>Corrective Actions:</b>	<ol style="list-style-type: none"> <li>1. A meeting of the health and safety steering committee has been held and an HSE committee has been reorganized in accordance with Congolese law with its powers as set by the said law</li> <li>2. The roles and responsibilities of the members of the Steering Committee have been identified</li> <li>3. A calendar of meetings has been created</li> </ol>
<b>Assessment Conclusion:</b>	<ol style="list-style-type: none"> <li>1. Reviewed minutes of meeting between the Responsible person for Health and Safety with the Committee members on the Health and Safety at Work on the 15/09/2021. The meeting was attended by 14 committee members.</li> <li>2. Reviewed a document titled "Health, Safety and Environmental Committee" dated 08/11/2021 and signed by the Director General. The document reviewed shows all the committee members with their assigned roles and responsibilities.</li> </ol> <p>Based on the evidences reviewed the NC is closed</p>

Non-conformity			
<b>NCR Ref #</b>	2111113-202108-M3	<b>Date Issued</b>	03/09/2021
<b>Due Date</b>	02/09/2022	<b>Date of nonconformity Closure</b>	23/12/2021
<b>Clause &amp; Category (Critical / Minor)</b>	Indicator 5.1.2 (Critical)		
<b>Statement of Nonconformity:</b>	The company does not explain the price of FFB to the loose fruit collectors		
<b>Requirement Reference:</b>	Evidence is available that the unit of certification regularly explains the FFB pricing to smallholders.		
<b>Objective Evidence:</b>	Brabanta did not provide evidence of having regularly explained its pricing to its Loose Fruit Collectors. The company did not have FFB suppliers but Loose Fruit Collectors who collect fruits from the wild and sell to the company. Interview with		

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	the company confirmed that it has not explained the pricing of loose fruits to collectors as required by this RSPO standard.
<b>Corrections:</b>	<ol style="list-style-type: none"> <li>1. Review the clauses of the village loose fruit purchase protocol to include clauses prohibiting child and forced labour</li> <li>2. Organise a meeting with all loose fruit collectors to communicate the price</li> <li>3. Include a discussion of the protocol in this meeting with the collectors</li> <li>4. Display prices in the villages</li> <li>5. Follow up to ensure that the pricing and posting of prices has been understood by the collectors</li> </ol>
<b>Root Cause Analysis:</b>	The pricing was communicated to village chiefs but these have not been properly disseminated. And some villagers, some harvesters and collectors have never attended the meetings
<b>Corrective Actions:</b>	<ol style="list-style-type: none"> <li>1. The protocol is reviewed and improved, and approved by the Suppliers of the Loose fruits</li> <li>2. Awareness-raising on child labour and forced labour is carried out from which the cutters supplying the village nuts have benefited</li> <li>3. A meeting is organized with the cutters and suppliers of the nuts</li> <li>4. Prices are displayed</li> <li>5. Whenever the price changes, this will be explained to the village harvesters</li> </ol>
<b>Assessment Conclusion:</b>	<ol style="list-style-type: none"> <li>1. Reviewed the contract of agreement between the company and the LFC signed on the 8/10/2021. The contract was updated to include the company's policies on child and forced labour.</li> <li>2. Reviewed minutes of meeting on the negotiations on the FFB pricing with the LFC on the 8/10/2021. Meeting was attended and signed by all 48 LFC</li> <li>3. Reviewed sensitization report on the company's policy on Child and Forced labour organised on the 22/09/2021 for 33 LFC</li> <li>4. Field visit showed the FFB pricing list displayed at the weighbridge and other vantage points easily access to the communities when they visit the company. Interview with the communities also established that the FFB pricing list has been displayed in the communities.</li> <li>5. Reviewed SOP on the FFB pricing and interview with the communities confirmed they were involved in the FFB pricing</li> </ol> <p>Based on the evidences reviewed the NC is closed</p>

Non-conformity			
<b>NCR Ref #</b>	2111113-202108-M4	<b>Date Issued</b>	03/09/2021
<b>Due Date</b>	02/09/2022	<b>Date of nonconformity Closure</b>	23/12/2021
<b>Clause &amp; Category (Critical / Minor)</b>	Indicator 6.1.5 (Critical)		
<b>Statement of Nonconformity:</b>	There is a lack of awareness among workers in the estate about the Gender Committee		
<b>Requirement Reference:</b>	A gender committee is in place specifically to raise awareness, identify and		



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	address issues of concern, as well as opportunities and improvements for women.
<b>Objective Evidence:</b>	The company has a gender committee in place formed on 11 <sup>th</sup> September 2019 with the aim of ensuring no sexual harassment at the work place, pregnant women do not handle chemical activities, breastfeeding women have enough time to breast feed the children, identification of new mothers needs and propose actions to the needs and ensure there are no discrimination against women for promotion. However, during interview with female workers at Kanaiga, Sanga Sanga and Kadima estate the workers indicated they are not aware of the existence of the gender committee.
<b>Corrections:</b>	<ol style="list-style-type: none"> <li>1. Hold a debriefing meeting on the NC audit with the current members of the Gender Committee</li> <li>2. Increase the number of members of the gender committee for more visibility and presence (from 2 to 16 members in agro i.e. 4 per division)</li> <li>3. Conduct a training meeting with all members, new and old, to explain to members their duty and the activities of the committee</li> <li>4. Presentation of the gender committee to all workers by department (General manager, factory, plantation by division and by section, hospital)</li> <li>5. Explain to all staff the role of the gender committee</li> <li>6. Create a meeting agenda and meetings with all staff per department and section for planting</li> </ol>
<b>Root Cause Analysis:</b>	The committee was set up without a formal presentation to all staff. The number of members was insufficient to cover the entire workforce of all the estates
<b>Corrective Actions:</b>	<ol style="list-style-type: none"> <li>1. On 13 September 2021 a meeting to re-launch the gender committee was held</li> <li>2. From 14 September 2021 presentations were given, explaining the role and responsibilities of the gender committee to all staff starting with Sanga Sanga, Kadima, Kanangai, Hospital, Garage, Factory,</li> <li>3. The number of members has increased to 24 across the company</li> <li>4. Member training is scheduled for 16 October 2021</li> <li>5. A diary, minutes template and meeting schedule have been created</li> </ol>
<b>Assessment Conclusion:</b>	<ol style="list-style-type: none"> <li>1. Review minutes of meeting on the 13/09/2021 by the Gender Committee on the Relaunch of the Gender Committee. The meeting was attended by 8 committee members.</li> <li>2. Reviewed minutes of meetings on the Roles and Responsibilities of the Gender Committee with workers Date: 15/12/2021 Venue: Kadima estate Attendance: 10 workers  Date: 17/09/2021 Venue: Kanaiga estate Attendance: 70 workers</li> <li>3. Reviewed a document captioned "List of Brabanta Gender Committee Members" dated 16/10/2021 and signed by the Responsible person for sustainability. The document as reviewed shows the number of the committee members has been increased from 10 to 24.</li> </ol>

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	<p>4. Review training records for members of the committee. Date: 16/10/2021 Venue: Conference room Attendance: 27</p> <p>5. Reviewed a plan titled Calendar on the Meeting of the Gender Committee” and signed by the Responsible person for sustainability. Review of the plan indicates the gender committee will hold meetings ones every three months. Based on the evidences reviewed the NC is closed</p>
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Non-conformity			
<b>NCR Ref #</b>	2111113-202108-M5	<b>Date Issued</b>	03/09/2021
<b>Due Date</b>	02/09/2022	<b>Date of nonconformity Closure</b>	23/12/2021
<b>Clause &amp; Category (Critical / Minor)</b>	Indicator 6.2.4 (Critical)		
<b>Statement of Nonconformity:</b>	Some of the housing facilities visited are not in good conditions		
<b>Requirement Reference:</b>	The unit of certification provides adequate housing, sanitation facilities, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. National laws, or in their absence the ILO Guidance on Workers’ Housing Recommendation No. 115, are used. In the case of acquisitions of non-certified units, a plan is developed detailing the upgrade of infrastructure. A reasonable time (5 years) is allowed to upgrade the infrastructure		
<b>Objective Evidence:</b>	<p>The company has a five-year development plan which aims at making more houses available to accommodate the workers. The plan was made available to the audit team for review. Currently the company has some houses which has been made available to the workers.</p> <p>However, field visits to some of the housing in Sanga Sanga, Kadima show most of the toilets and bathrooms are damaged and has not been repaired.</p>		
<b>Corrections:</b>	<ol style="list-style-type: none"> <li>1. Creation of a team to carry out housing and toilet/bathrooms inventories</li> <li>2. Conduct housing inventories and provide information on the quality and efficiency of housing in general and sanitation in particular</li> <li>3. Assess the cost</li> <li>4. Draw up a budget</li> <li>5. Draw up a programme (with a timetable of activities) for the construction and rehabilitation of the toilets</li> <li>6. Build and rehabilitate the toilets</li> <li>7. Integrate sanitation facilities in new constructions</li> <li>8. Educate users on proper use and maintenance</li> <li>9. Make a programme of visits to check the efficiency, hygiene and cleanliness of the sanitary blocks (HSE department)</li> </ol>		

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	10. Set up a system to report any deterioration (damage) and failure of the sanitary facilities
<b>Root Cause Analysis:</b>	Inefficiency of the sanitary facilities built in the camps, no monitoring of the efficiency of the sanitary facilities in the villages, lack of training on hygiene and the correct use of the sanitary facilities, lack of a system in place to report any damage or malfunctioning of the sanitary facilities in particular and housing in general
<b>Corrective Actions:</b>	<ol style="list-style-type: none"> <li>1. A team shall consist of the Head of Division 1, HSE manager and Sustainability manager (RGDD). Based on the report of the camp visit to assess the situation of the sanitary facilities in Division 1</li> <li>2. A proposal was made to the Director of Finance who assessed the cost of the project</li> <li>3. A budget was voted based on cash flow</li> <li>4. A staggered program 2021-2022 is set up</li> <li>5. A call for tenders has been launched</li> <li>6. Contractors have been selected for the realization of the said project (NELFI Group, LA FRAUGNES, ZAFRICOM)</li> <li>7. A quarterly inspection program by the camp is set up (a report is written by the camp service. This will be done every 3 months). Inspection information is used to populate Brabanta camp data (Brabanta Data Camps)</li> </ol>
<b>Assessment Conclusion:</b>	<ol style="list-style-type: none"> <li>1. Reviewed a report titled " Rapport sur la Mission d'évaluation de la situation et d'inventaires des sanitaires en Division 1 realisee du 15 au 16 September 2021" dated 16/09/2021 and signed by the responsible person for Sustainability Development. This is an assessment report on the housing situation in the various estates. Also reviewed a report captioned "Sanitary Situation in Division 1" and it identified the number of sanitary to be constructed in the camps</li> <li>2. Reviewed a proposal sent to the Director of finance based on the assessment that was conducted. The proposal identifies the number of toilet and bathrooms that needs to be constructed and renovated between 2021 to 2023.</li> <li>3. Field visit to the housing units in the Sanga Sanga, Kadima and Kanaiga estates identified the construction of new toilets and bathrooms for workers use and others are in the process of being constructed</li> <li>4. The company has documented a procedure captioned "procédure de demande des travaux (entretien et réparation bâtiment)" dated 21 October 2021 and approved by the Director General. The procedure as reviewed present the steps that must be followed to ensure the maintenance of the facilities. During housing visits by the audit team, workers confirmed they have received an informal training on the procedure at their morning muster and also at the housing units.</li> </ol> <p>Based on the evidences reviewed the NC is closed</p>

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Non-conformity			
<b>NCR Ref #</b>	2111113-202108-M6	<b>Date Issued</b>	03/09/2021
<b>Due Date</b>	02/09/2022	<b>Date of nonconformity Closure</b>	23/12/2021
<b>Clause &amp; Category (Critical / Minor)</b>	Indicator 6.3.1 (Critical)		
<b>Statement of Nonconformity:</b>	The company internal regulations places a limit on the rights to form an association		
<b>Requirement Reference:</b>	A published statement recognising freedom of association and right to collective bargaining in national languages is available and is explained to all workers in languages that they understand, and is demonstrably implemented		
<b>Objective Evidence:</b>	<p>The company has a documented Freedom of Association policy dated 26/02/2017 and signed by the General Manager. The policy indicates that Brabanta supports the right of workers to freely associate with others, including the right to form and join trade unions for the protection of their interests.</p> <p>However, the company policy states that the right to the association applies only on condition that it does not interfere with the internal regulations. The rights to form an association is given by the constitution and it cannot be limited by the working regulations of Brabanta</p>		
<b>Corrections:</b>	<ol style="list-style-type: none"> <li>1. Review policy based on national legislation only</li> <li>2. Disseminate widely to all staff</li> <li>3. Raise awareness among all staff and neighbouring communities</li> </ol>		
<b>Root Cause Analysis:</b>	The reason for including this section was to ensure that any association formed always complied with general company regulations and policies, such as non-discrimination.		
<b>Corrective Actions:</b>	<ol style="list-style-type: none"> <li>1. The policy was revised since 1/09/2021</li> <li>2. A display on the billboards took place through the site</li> <li>3. Awareness-raising took place in different departments</li> </ol>		
<b>Assessment Conclusion:</b>	<ol style="list-style-type: none"> <li>1. Reviewed a revised policy on the freedom of association dated 01/09/2021 and signed by the Director General. The policy was revised to exclude restriction on the rights to freedom of association which was based on the company's internal regulations.</li> <li>2. Reviewed records on the Awareness and sensitization of workers on the policy. <ul style="list-style-type: none"> <li>Topic: Freedom of Association policy</li> <li>Date: 14/10/2021</li> <li>Venue: Sanga Sanga</li> <li>Attendance:12 workers</li> </ul>   <ul style="list-style-type: none"> <li>Topic: Freedom of Association policy</li> <li>Date: 14/10/2021</li> <li>Venue: Kanaiga estate</li> </ul> </li> </ol>		

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	<p style="text-align: center;">Attendance:15 workers</p> <p>3. Field visit also established the display of the policy on the notice boards in and around the company.</p> <p>Based on the evidences reviewed the NC is closed</p>
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Non-conformity			
<b>NCR Ref #</b>	2111113-202108-M7	<b>Date Issued</b>	03/09/2021
<b>Due Date</b>	02/09/2022	<b>Date of nonconformity Closure</b>	23/12/2021
<b>Clause &amp; Category (Critical / Minor)</b>	Indicator 6.7.1 (Critical)		
<b>Statement of Nonconformity:</b>	There are no record of meeting between H&S committee and workers		
<b>Requirement Reference:</b>	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		
<b>Objective Evidence:</b>	Brabanta has Identified the HSE Manager as the responsible person for the company's HSE verified from his Job description (Definition de Fonction) of 03/02/2020. The company uses the Tools Box Talks to communicate on Health and Safety to workers weekly. The company has constituted HSE Committee which is yet to function and to receive feedback from workers for action. Currently, the company uses medical records from its clinics as the proxy for health and safety concerns for workers (e.g. High medical attendance for Malaria as proxy for high mosquito infestation and for action such as supply of Mosquito nets). Consequently, the company only partially conform to this requirement as it has no means of receiving the health and safety and welfare concerns of workers.		
<b>Corrections:</b>	<ol style="list-style-type: none"> <li>1. Convene the first meeting of the Health and Safety Committee to define the committee's activities</li> <li>2. Create a mechanism to provide feedback to the health and safety committee for discussion and decisions to be made</li> <li>3. Raise awareness to workers to report unsafe situations</li> <li>4. Formally report workers' requests and grievances in the area of health and safety at work</li> <li>5. Compile the requests and grievances to be discussed by the health and safety committee</li> <li>6. Share information on decisions taken, to those concerned in particular and to all staff in general</li> </ol>		
<b>Root Cause Analysis:</b>	No formalization of feedback and consideration of workers' requests and grievances, but requests are dealt with (e.g. medical consultation procedure), the committee's activities not yet well defined although the plan is developed		
<b>Corrective Actions:</b>	<ol style="list-style-type: none"> <li>1. A meeting of the HSE Committee was convened</li> <li>2. An organisation chart was drawn up (restructuring of the HSE committee)</li> </ol>		

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	<ol style="list-style-type: none"> <li>3. The function, role and responsibility of each member have been defined</li> <li>4. A meeting schedule is set</li> <li>5. A plan has been implemented to gather worker feedback on safety and security and to discuss it at the management level. If necessary, changes will be made to safety and security measures to address workers' concerns.</li> </ol>
<b>Assessment Conclusion:</b>	<ol style="list-style-type: none"> <li>1. Reviewed records on minutes of meetings on the Health and Safety at work by the HSE Committee on the 15/09/2021. The meeting was attended by 14 committee members</li> <li>2. Reviewed the HSE committee organisational chart dated 8/10/2021 and signed by the General Director.</li> <li>3. Reviewed a document titled "Health, Safety and Environmental Committee" dated 08/11/2021 and signed by the Director General. The document reviewed shows all the committee members with their assigned roles and responsibilities.</li> <li>4. Reviewed a document captioned " Calendrier de Rencontres (Reunions) du comite de Pilotage SST Brabanta" dated 15/09/2021 and approved by the Responsible person for Sustainable Development. The document as reviewed indicates that the committee will meet ones every month on the first week of the month.</li> <li>5. The company has captioned "Plan de Sante et Securite au Travail" dated 04/03/2021 and signed by the Director General. The objective of the plan is to recommend actions. The plan outlines five steps to be implemented in the event of an accident. The plan is implemented through analysis of risk, creation of the HSE committee, and sensitization of workers.</li> </ol> <p>Based on the evidences reviewed the NC is closed</p>

Non-conformity			
<b>NCR Ref #</b>	2111113-202108-M8	<b>Date Issued</b>	03/09/2021
<b>Due Date</b>	02/09/2022	<b>Date of nonconformity Closure</b>	23/12/2021
<b>Clause &amp; Category (Critical / Minor)</b>	Indicator 6.7.3 (Critical)		
<b>Statement of Nonconformity:</b>	Workers were found not to be using their PPEs		
<b>Requirement Reference:</b>	Workers use appropriate personal protective equipment (PPE), which is provided free of charge to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, land preparation, and harvesting. Sanitation facilities for those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing.		
<b>Objective Evidence:</b>	Brabanta has provided PPEs free of charge to its workers. However, several workers from the Mill, harvesting operations and other operational sites sighted and interviewed by the audit team were not using their provided PPEs. For example, at the Ramp in the Mill, at the Kadima Water Catchment site.  Also, the company has provided sanitation facilities for its pesticide applicators to change out of their PPEs into their personal clothing. Inspection of the design of		

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	<p>such facility at Sanga Sanga however, suggested that workers can contaminate their personal clothing from the field before they change out and wash. Respirators are not used at those chemical stores which stores pesticides. For example, shelves at the KCI Depot 3 where fungicides such as Addax DG are stored.</p>
<p><b>Corrections:</b></p>	<ol style="list-style-type: none"> <li>1. Implementation of the PPE management procedure by heads of department</li> <li>2. Intensify awareness-raising on the use of PPE for all staff</li> <li>3. Train operators in the use of PPE (how to put on and take off each PPE, how to maintain each PPE)</li> <li>4. Systematic checks on the wearing of PPE by team leaders (see PPE management procedure) before and during work</li> <li>5. Arrange the changing rooms at Sanga Sanga to ensure that there is no contamination of personal clothing</li> <li>6. Raise awareness among the users of the changing room</li> <li>7. Train all those involved in the use of the changing room</li> </ol>
<p><b>Root Cause Analysis:</b></p>	<p>Construction of showers underway and not yet completed at the time of the audit/ Training has been provided to all levels of the operation on the PPE required for their task, and PPE is provided and available to all workers. However, it appears that some workers did not fully understand the need to wear their PPE. Furthermore, these non-compliances were not observed by the leaders and supervisors who are in place to ensure compliance with PPE. A lack of understanding and execution of tasks is therefore considered the root cause of this NC.</p>
<p><b>Corrective Actions:</b></p>	<ol style="list-style-type: none"> <li>1. The PPE management procedure was drafted and approved by the DG</li> <li>2. A broadcast of the procedure took place via Outlook</li> <li>3. Awareness-raising began in different departments during morning calls</li> <li>4. And controls by managers at the departmental level take place</li> <li>5. The Sanga Sanga changing rooms have been demolished and reconstruction work is underway</li> </ol>
<p><b>Assessment Conclusion:</b></p>	<ol style="list-style-type: none"> <li>1. Reviewed a procedure captioned Procedure de gestion des EPI dated 04/04/2021.</li> <li>2. Evidence of dissemination of the procedure to all the sectional heads through Microsoft outlook on the 9/10/2021 was reviewed.</li> <li>3. Reviewed records on the sensitization on the procedure <ul style="list-style-type: none"> <li>Topic: PPE Management</li> <li>Date: 14/10/2021</li> <li>Venue: Kanaiga Estate (C1)</li> <li>Attendance: 15 workers</li>   <li>Topic: PPE Management</li> <li>Date: 14/10/2021</li> <li>Venue: Sanga Sanga Estate (A1,A5,A2 A3)</li> <li>Attendance: 12 workers</li> </ul> </li> </ol>

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	4. Field visit to the Sanga Sango estate shows a new changing room for the chemical applicators has been constructed and is in use. Based on the evidences reviewed the NC is closed
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Non-conformity			
<b>NCR Ref #</b>	2111113-202108-M9	<b>Date Issued</b>	03/09/2021
<b>Due Date</b>	02/09/2022	<b>Date of nonconformity Closure</b>	23/12/2021
<b>Clause &amp; Category (Critical / Minor)</b>	Indicator 7.2.7 (Critical)		
<b>Statement of Nonconformity:</b>	The company stores expired chemicals together with the good ones in the same room		
<b>Requirement Reference:</b>	Storage of all pesticides is in accordance with recognised best practices.		
<b>Objective Evidence:</b>	<p>HSE has developed a checklist for the monitoring of storage zones for pesticides (Checklist: <i>Stockage des Produits Chimiques</i>). This checklist is used for monitoring on a regular basis. The checklist encompasses issues of safety, security, proper aeration, inventories, PPE, etc. in and around the storage zones. A monthly action plan for the monitoring of storage areas has been developed by the unit of certification. The action plan for the month of August was presented during the audit.</p> <p>However, at the main chemical/pesticides storage site, expired chemicals were found stored in the same space as chemicals that are still being used.</p> <p>This was the case with KCl in Depot 2, with expiry date of 01/2021. Additionally, in Depot 3, we found that 2, 4D Amine (720g/l), manufactured on 27/02/2021, was stored. Whereas the information sheet on the container says the product expires after two years (i.e., 2013 in this case), the product was still found on the shelves in Depot 3. Other expired products were equally found on the shelves in Depot 3, namely Addax and Carbalm.</p>		
<b>Corrections:</b>	<ol style="list-style-type: none"> <li>1. Make an inspection schedule for storage facilities</li> <li>2. Take inventory of stored products</li> <li>3. Identify expired products and quantify them (volume, count)</li> <li>4. Create a storage unit to store expired products</li> <li>5. Store all expired products in compliance with the rules of incompatibility, wearing PPE, retention, etc.</li> <li>6. Find an approved service provider to collect them</li> <li>7. If no service provider can be found, a plan will be drawn up to manage the stock of obsolete chemicals, in accordance with national legislation.</li> </ol>		
<b>Root Cause Analysis:</b>	Lack of authorised service providers able to collect expired items for disposal or destruction, insufficient space and reorganisation of storage areas		
<b>Corrective Actions:</b>	<ol style="list-style-type: none"> <li>1. An inspection took place at the Beach depot 16 September 2021</li> <li>2. An inventory of products has been made</li> </ol>		



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	<ol style="list-style-type: none"> <li>3. The identification of all expired products made and a list of expired products is established</li> <li>4. All products have been grouped and separated from non-expired products and then stored according to incompatibilities with global retention</li> <li>5. Inspections were carried out in other chemical and phytosanitary depots of the plantation (10-16 October), as part of the monthly inspections of the depot.</li> <li>6. Two potential providers are found with whom we are in discussion and evaluation at the end of making a selection of the best provider based on their experiences</li> <li>7. Information and research is provided that confirms that granular KCl does not expire.</li> <li>8. All KCL will be spread in planting from November</li> </ol>
<b>Assessment Conclusion:</b>	<ol style="list-style-type: none"> <li>1. Reviewed a list of all the expired pesticides identified after an inventory was taken on the 17/10/2021.</li> <li>2. A visit to the main chemical store also shows all the identified expired chemicals have been separated from the other chemicals still good for use.</li> <li>3. Reviewed mail correspondence between the company and three sub-contractors on the management of waste including expired pesticides generated in the company.</li> </ol> <p>Based on the evidences reviewed the NC is closed</p>

Non-conformity			
<b>NCR Ref #</b>	2111113-202108-M10	<b>Date Issued</b>	03/09/2021
<b>Due Date</b>	02/09/2022	<b>Date of nonconformity Closure</b>	23/12/2021
<b>Clause &amp; Category (Critical / Minor)</b>	Indicator 7.10.1 (Critical)		
<b>Statement of Nonconformity:</b>	The company does not have a documented plan in place to reduce or minimise the GHG		
<b>Requirement Reference:</b>	GHG emissions are identified and assessed for the unit of certification. Plans to reduce or minimize them are implemented, monitored through the Palm GHG calculator and publicly reported.		
<b>Objective Evidence:</b>	Whereas the Unit of certification has identified some GHG emissions from different operations, and reports these publicly on Palm GHG, no plan to reduce or minimise the GHG has been developed by Brabanta.		
<b>Corrections:</b>	<ol style="list-style-type: none"> <li>1. Assessing emissions coming from the plantations operations based on national and international emission standards and requirements</li> <li>2. Creation of a GHG management plan</li> <li>3. Dissemination of the plan after approval</li> <li>4. Implement the plan</li> <li>5. Monitor and evaluate the plan</li> </ol>		

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<b>Root Cause Analysis:</b>	The company did not have all the information needed to complete the GHG plan before the audit due to lack of time.
<b>Corrective Actions:</b>	<ol style="list-style-type: none"> <li>1. Palm GHG summary is available</li> <li>2. A GHG management plan is created and validated</li> <li>3. A dissemination of the plan has taken place through the site by sharing via Outlook to all department heads who will make it widely distributed to employees</li> </ol>
<b>Assessment Conclusion:</b>	<ol style="list-style-type: none"> <li>1. Reviewed a plan captioned "Plan de gestion de Gaz a Effet de Serre" dated 18/10/2021 and approved by the Director general. The document has been shared with the various departmental heads as seen on the plan document.</li> <li>2. Reviewed the Mill summary report for year 2020</li> </ol> <p>Based on the evidences reviewed the NC is closed</p>

Non-conformity			
<b>NCR Ref #</b>	2111113-202108-M11	<b>Date Issued</b>	03/09/2021
<b>Due Date</b>	02/09/2022	<b>Date of nonconformity Closure</b>	23/12/2021
<b>Clause &amp; Category (Critical / Minor)</b>	Indicator 3.8.5 (Critical)		
<b>Statement of Nonconformity:</b>	The company's identified person responsible for the implementation of the supply chain model has not received training to implement the applicable supply chain		
<b>Requirement Reference:</b>	<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> <ol style="list-style-type: none"> <li>a. Identification of the role of the person having the 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.</li> </ol>		
<b>Objective Evidence:</b>	The company has documented procedures to ensure the implementation of all elements of the applicable supply chain model specified. Also, Mr Urbain Mbambu (the RSPO coordinator) has been identified as the person with overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. However, he is yet to receive training to be able to implement the requirement of the SCC		
<b>Corrections:</b>	<ol style="list-style-type: none"> <li>1. Find out about the possibility of taking a training course in French</li> <li>2. Follow the online training in French</li> <li>3. In the meantime, discuss with colleagues from other subsidiaries who have been trained or who have knowledge of the subject</li> <li>4. Visit one of Socfin's subsidiaries to learn how they are implementing the supply chain certification system</li> </ol>		
<b>Root Cause Analysis:</b>	The RSPO manager registered for the online training in June 2021 but it was in English and difficult for him to understand since French is the official spoken and written language		

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<b>Corrective Actions:</b>	<ol style="list-style-type: none"> <li>1. Urbain Mbambu, as well as the people involved in supply chain verification, were trained at Brabanta regarding supply chain procedures (on 22/09/2021).</li> <li>2. Urbain was trained on RSPO 2020 supply chain standards by Thomas Lavreys of SOCFINCO (26/10/2021)</li> <li>3. Urbain will visit SAFACAM, an RSPO certified site of Socfin, from 6 to 24 November. It will follow supply chain procedures more closely</li> </ol>
<b>Assessment Conclusion:</b>	<p>Mr Urbain received an informal training from the Socfin Sustainability group and during interview with the audit team, he was able to demonstrate knowledge on the implementation of the supply chain procedures.</p> <p>Based on the evidences reviewed the NC is closed</p>

Non-conformity			
<b>NCR Ref #</b>	2111113-202108-M12	<b>Date Issued</b>	03/09/2021
<b>Due Date</b>	02/09/2022	<b>Date of nonconformity Closure</b>	23/12/2021
<b>Clause &amp; Category (Critical / Minor)</b>	Indicator 3.8.6 (Critical)		
<b>Statement of Nonconformity:</b>	The company does not have a documented procedure for internal audits		
<b>Requirement Reference:</b>	Internal Audit i. The mill shall have a written procedure to conduct an annual internal audit to determine whether the mill; a. Conforms to the requirements in the RSPO SC requirements for mills and the RSPO Rules on Market Communication and Claims		
<b>Objective Evidence:</b>	The company does not have a documented procedure for the internal audit and has not conduct any internal audit as of the time of the audit		
<b>Corrections:</b>	<ol style="list-style-type: none"> <li>1. Complete the drafting of the procedure</li> <li>2. Have the "internal audit" procedure validated</li> <li>3. Disseminate the procedure</li> <li>4. Implement the procedure</li> <li>5. Follow up and control the implementation of the procedure</li> </ol>		
<b>Root Cause Analysis:</b>	The drafting of the procedure was not finalised or approved by the day of the audit		
<b>Corrective Actions:</b>	<ol style="list-style-type: none"> <li>1. The procedure is finalised</li> <li>2. The procedure is validated</li> <li>3. The procedure shall be disseminated</li> <li>4. A program is established with EF to deliver the training on their next visit</li> <li>5. An internal audit will be carried out 2-3 months before the surveillance audit</li> </ol>		
<b>Assessment Conclusion:</b>	Reviewed the company's documented procedure for internal audits for the Supply Chain. The document is captioned "Internal Audit Procedures" dated 22/09/2021 and approved by the Director General. The document as reviewed indicates the		

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	<p>internal assessment will be conducted twice in a year and will be done by an external person from the Socfin Sustainability group. The company is in the process of scheduling for its first internal assessment.</p> <p>Based on the evidences reviewed the NC is closed</p>
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Non-conformity			
<b>NCR Ref #</b>	2111113-202108-M13	<b>Date Issued</b>	03/09/2021
<b>Due Date</b>	02/09/2022	<b>Date of nonconformity Closure</b>	23/12/2021
<b>Clause &amp; Category (Critical / Minor)</b>	Indicator 3.8.7 (Critical)		
<b>Statement of Nonconformity:</b>	FFB sourced from the communities arrives at the company's weighbridge without any receipts		
<b>Requirement Reference:</b>	Purchasing and Goods In The mill shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFB's received.		
<b>Objective Evidence:</b>	FFB from the estate that are received at the weighbridge comes with receipts. The receipts titled Details on the transport of FFB. Some of the information recorded on the receipt include the source of the FFB, Date, Truck drive and number and tonnage of the FFB  However, fruits from the communities that arrives at the weighbridge are not covered by any document.		
<b>Corrections:</b>	<ol style="list-style-type: none"> <li>1. Review the encoding system</li> <li>2. Add to the village fruits receipt slip the origin and routes of the fruits</li> <li>3. Put in use the existing document (weight, transport, origin, route, date, etc.)</li> <li>4. Train and sensitize fruits suppliers on how to fill in the dispatch note</li> <li>5. Train and sensitize the weighbridge operator on the encoding of the dispatch note in the system</li> <li>6. Monitor and evaluate</li> </ol>		
<b>Root Cause Analysis:</b>	The existing document containing the traceability of the village fruits was not used for several weeks (weight, transport, origin, route, date, etc.)		
<b>Corrective Actions:</b>	<ol style="list-style-type: none"> <li>1. The slip has been created</li> <li>2. A meeting was held with all parties concerned</li> <li>3. An attendance list, photos and a report of the meeting sanctioned the end of the meeting</li> </ol>		
<b>Assessment Conclusion:</b>	<ol style="list-style-type: none"> <li>1. The company has designed a form that accompanies the purchase of loose fruits. Copies were made available for review and some of the information captured on the form include: source (village), date, supplier, and weight of the FFB</li> <li>2. Reviewed minutes of meeting between the company and the loose fruits collectors on the 9/10/2021. The purpose of the meeting was to explain</li> </ol>		

	<p>among other things the introduction of the FFB forms for transporting Loose fruits from communities and explain how to fill the form</p> <p>Based on the evidences reviewed the NC is closed</p>
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Non-conformity			
<b>NCR Ref #</b>	2111113-202108-M14	<b>Date Issued</b>	03/09/2021
<b>Due Date</b>	02/09/2022	<b>Date of nonconformity Closure</b>	23/12/2021
<b>Clause &amp; Category (Critical / Minor)</b>	Indicator 3.8.12 (Critical)		
<b>Statement of Nonconformity:</b>	The company does not have a retention period for their documents		
<b>Requirement Reference:</b>	<p>Record Keeping</p> <p>i. The mill shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of these RSPO Supply Chain Certification Standard requirements.</p> <p>ii. Retention times for all records and reports shall be a minimum of two (2) years and shall comply with relevant legal and regulatory requirements and be able to confirm the certified status of raw materials or products held in stock.</p>		
<b>Objective Evidence:</b>	The company keeps records and reports covering all aspects of the RSPO Supply Chain Certification Standard requirements. However the company has no documented procedures covering the retention periods for their reports.		
<b>Corrections:</b>	<ol style="list-style-type: none"> <li>1. Implement the supply chain management procedure</li> <li>2. Train and sensitize all relevant staff</li> <li>3. Keep records for a period of two years</li> </ol>		
<b>Root Cause Analysis:</b>	The procedure exists but we could not demonstrate that the records were effective, the supply chain management procedure not implemented on the day of the audit		
<b>Corrective Actions:</b>	<ol style="list-style-type: none"> <li>1. The procedure was broadcast via Outlook</li> <li>2. Training on the implementation of the procedure has taken place</li> <li>3. An attendance list sanctioning the participation of the persons concerned is established</li> </ol>		
<b>Assessment Conclusion:</b>	<ol style="list-style-type: none"> <li>1. Review the company's document captioned "Procedure De Gestion De La Chaine D' Approvisionnement Et De La Tracabilite" dated 07/07/2021 and approved by the Director General. The document indicates all records will be kept for a period of 5 years.</li> <li>2. Reviewed records on training for the implementation of the procedures. Topic: Implementation of the Supply Chain Date: 04/12/2021 Attendance: 7 workers involved in the implementation of the procedure.</li> </ol> <p>Based on the evidences reviewed the NC is closed</p>		

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Non-conformity 5			
<b>NCR Ref #</b>	2111113-202108-M15	<b>Date Issued</b>	03/09/2021
<b>Due Date</b>	02/09/2022	<b>Date of nonconformity Closure</b>	23/12/2021
<b>Clause &amp; Category (Critical / Minor)</b>	Indicator 3.8.9 (Critical)		
<b>Statement of Nonconformity:</b>	None of the contracts for the transporters contains the requirements as demanded by the indicator		
<b>Requirement Reference:</b>	<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>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>		
<b>Objective Evidence:</b>	<p>The company outsources the transportation of FFB from their estate to the mill. There are currently 6 FFB contract transporters and all have a contract with company.</p> <p>A Reviewed of sampled contracts for the transporters did not identify any of the requirements as stated in the indicator. Also there are no documented control system in place for the outsourced process.</p>		
<b>Corrections:</b>	<ol style="list-style-type: none"> <li>1. Create a procedure for managing subcontracting based on the existing Congolese law on subcontracting.</li> <li>2. Convene a meeting with all transport operators at the end of the current exclusive contract and terminate it</li> <li>3. Present the new contract with all requirements: HSE-RSPO and legal</li> <li>4. Explain all these requirements to everyone</li> <li>5. Have all transporters sign the contract</li> <li>6. The contract is signed in duplicate for each carrier</li> <li>7. Conduct regular monitoring and evaluation with all transporters to ensure compliance with the contract based on the checklist</li> </ol>		

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	<ol style="list-style-type: none"> <li>8. Develop an action plan for corrective measures in case of non-compliance</li> <li>9. Follow up on the implementation of corrective measures</li> </ol>
<b>Root Cause Analysis:</b>	The company took the decision to wait until the old contracts have expired, to include the clauses into the new contracts, which will be open to other businesses.
<b>Corrective Actions:</b>	<ol style="list-style-type: none"> <li>1. A contract has been created and validated</li> <li>2. The agreement is being validated</li> <li>3. Since the first contract will end on November 11, 2021, a call for tenders will be launched to select the future carriers who will sign the new agreement with all the requirements.</li> <li>4. A meeting will be organized between the potential transporter and the management of the Brabanta to explain the convention.</li> <li>5. Signature of the agreement between the two parties</li> </ol>
<b>Assessment Conclusion:</b>	<p>The contracts for the transportation of FFB by the third party Contractors from the plantations to the mill has expired and the company has sent a call for tender for the transportation of FFB. The call for tender was made available to the audit for review and it meets the requirements of the indicator.</p> <p>Based on the evidences reviewed the NC is closed</p>

Non-conformity			
<b>NCR Ref #</b>	2111113-202108-N1	<b>Date Issued</b>	03/09/2021
<b>Due Date</b>	Next Surveillance Audit	<b>Date of nonconformity Closure</b>	Open until Next Surveillance Audit
<b>Clause &amp; Category (Critical / Minor)</b>	Indicator 3.7.3 (Minor)		
<b>Statement of Nonconformity:</b>	There are no evidence of training for personnel implementing the Supply Chain Certification Standard (SCCS).		
<b>Requirement Reference:</b>	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		
<b>Objective Evidence:</b>	<p>The company has identified personnel critical to the implementation of the Supply Chain Certification Standard (SCCS). They include the mill manager, weighbridge clerk, RSPO Coordinator, Financial director, Assistant mill manager.</p> <p>However there are no evidence of training for the personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS).</p>		
<b>Corrections:</b>	<ol style="list-style-type: none"> <li>1. Organise an introductory meeting for staff essential to the implementation of the supply chain certification standard</li> <li>2. Train these staff on the implementation of the standard</li> <li>3. Implement the supply chain management procedure starting with training these staff on the supply chain management procedure</li> <li>4. Create monitoring and evaluation documents for the procedure</li> </ol>		

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	<ol style="list-style-type: none"> <li>5. Evaluate the staff directly responsible for implementation on a regular basis as needed</li> <li>6. Evaluate the implementation of the procedure</li> </ol>
<b>Root Cause Analysis:</b>	Supply Chain management procedure not yet implemented, staff identified to be in charge of implementation not yet informed of their responsibility, no meeting held with them
<b>Corrective Actions:</b>	<ol style="list-style-type: none"> <li>1. A training meeting was held with the financial director, mill director, weighbridge clerk and personnel responsible for sustainable development.</li> <li>2. A training in December 2021 with the participation of: mill manager assistant, division 1 section chiefs, weighbridge clerk, financial director.</li> <li>3. Pending modification of the weighbridge encoding file to allow the system to state if the FFB is coming from a certified or non-certified area.</li> <li>4. A checklist is being developed to monitor and evaluate the implementation of the procedure</li> </ol>
<b>Assessment Conclusion:</b>	The corrective action plan has been reviewed and accepted. Effective implementation of the corrective action will be verified in the next assessment

Non-conformity			
<b>NCR Ref #</b>	2111113-202108-N2	<b>Date Issued</b>	03/09/2021
<b>Due Date</b>	Next Surveillance Audit	<b>Date of nonconformity Closure</b>	Open until Next Surveillance Audit
<b>Clause &amp; Category (Critical / Minor)</b>	Indicator 6.2.6 (Minor)		
<b>Statement of Nonconformity:</b>	The company is paying a minimum wage which is a result of a unilateral decision by the company and in direct violation of the directive from government		
<b>Requirement Reference:</b>	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.		
<b>Objective Evidence:</b>	<p>Congo DR has a National daily minimum wage declared by the government in 2019 of 7,075 Congolese Franc. However, there was a follow up directive from the government to corporations in the agricultural sector indicating they can review the daily rate in consultations with the workers' representatives.</p> <p>Brabanta has a daily rate that they pay to the workers. However this was not reached in consultations with the workers representative as required by the directives.</p>		
<b>Corrections:</b>	<ol style="list-style-type: none"> <li>1. Convene a meeting with the union</li> <li>2. Present the old and current pay scale</li> <li>3. Explain the reasons for this scale in relation to the company's situation</li> <li>4. Present the project of adjustment in relation to the company's productivity</li> <li>5. Have the old and new pay scales signed and archived as proof of the agreements</li> </ol>		



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<b>Root Cause Analysis:</b>	Lack of communication, misinterpretation and misunderstanding from the trade unions, lack of training and information on the role and responsibility of trade unions towards the company and employees
<b>Corrective Actions:</b>	<ol style="list-style-type: none"> <li>1. A meeting with the delegates was organized</li> <li>2. The financial situation of the Brabanta explained and showed the reasons for the scale to be as it is</li> <li>3. A salary scale is proposed to the delegates with a project of adjustment if possible</li> <li>4. Wage scale approved by the workers' delegates and implemented by Brabanta</li> </ol>
<b>Assessment Conclusion:</b>	The corrective action plan has been reviewed and accepted. Effective implementation of the corrective action will be verified in the next assessment

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

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	<ol style="list-style-type: none"> <li>2. The legal process of the procedure was presented to the delegates</li> <li>3. The previous minutes were signed by the delegates</li> <li>4. A copy of each minute was given to the delegates with acknowledgement of receipt</li> <li>5. The minutes are archived at the Human Resources level</li> </ol>
<b>Assessment Conclusion:</b>	The corrective action plan has been reviewed and accepted. Effective implementation of the corrective action will be verified in the next assessment

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

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	is indicated on the work contract, but there is a lack of information and awareness, and a lack of formalisation of the verification mechanism during hiring
<b>Corrective Actions:</b>	<ol style="list-style-type: none"> <li>1. Jean Marie ILONGO's contract was terminated to resume at a later date due to the lack of a person to follow these activities</li> <li>2. A memorandum of understanding on the requirements of subcontracting has been signed by all service providers in which is included the obligation by the providers not to employ any person under the age of 18 as required by law and is stated in the child protection policy</li> <li>3. Regular inspections are carried out by the HSE team to verify the presence of minors in each worksite</li> <li>4. Awareness and popularization of the child protection policy</li> <li>5. A remediation procedure will be drafted and implemented in collaboration with the Earthworm Foundation by July 2022</li> </ol>
<b>Assessment Conclusion:</b>	The corrective action plan has been reviewed and accepted. Effective implementation of the corrective action will be verified in the next assessment

<b>Non-conformity</b>			
<b>NCR Ref #</b>	2111113-202108-N5	<b>Date Issued</b>	03/09/2021
<b>Due Date</b>	Next Surveillance Audit	<b>Date of nonconformity Closure</b>	Open until Next Surveillance Audit
<b>Clause &amp; Category (Critical / Minor)</b>	Indicator 6.5.3 (Minor)		
<b>Statement of Nonconformity:</b>	The company does not have documented reports on engagements with nursing mothers		
<b>Requirement Reference:</b>	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		
<b>Objective Evidence:</b>	<p>During interview with the women in the plantations they did indicated that there has been a meeting to know their needs and actions has been taken to address their needs.</p> <p>However, they are no documented report on the needs assessment conducted or any other report on engagements with the nursing mothers.</p>		
<b>Corrections:</b>	<ol style="list-style-type: none"> <li>1. Raising awareness about the rights and needs of new mothers</li> <li>2. Organise meetings with women as needed</li> <li>3. Record and archive all sensitisations and meetings (Record meetings)</li> <li>4. Create a meeting agenda, Create standard meeting minutes</li> <li>5. Follow up on the recommendations of each meeting</li> </ol>		
<b>Root Cause Analysis:</b>	No formal recording, no minutes of meetings, no records of sensitisations		
<b>Corrective Actions:</b>	<ol style="list-style-type: none"> <li>1. A meeting was held to discuss the needs of new mothers</li> <li>2. Minutes of the meetings are prepared and available</li> <li>3. An action plan is drafted based on the conclusions of the meeting</li> <li>4. The discussed actions are implemented and sensitization meetings are organized by the gender committee to sensitize women on the subject</li> </ol>		

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	<ol style="list-style-type: none"> <li>5. An annual program of meetings with women is established</li> <li>6. The sustainable development responsible is committed to monitoring the progress of meetings between the gender committee and women working in Brabanta</li> </ol>
<b>Assessment Conclusion:</b>	The corrective action plan has been reviewed and accepted. Effective implementation of the corrective action will be verified in the next assessment

Non-conformity			
<b>NCR Ref #</b>	2111113-202108-N6	<b>Date Issued</b>	03/09/2021
<b>Due Date</b>	Next Surveillance Audit	<b>Date of nonconformity Closure</b>	Open until Next Surveillance Audit
<b>Clause &amp; Category (Critical / Minor)</b>	Indicator 7.8.3 (Minor)		
<b>Statement of Nonconformity:</b>	There are no reports on BOD/COD analysis of its mill effluents discharged.		
<b>Requirement Reference:</b>	Mill effluent is treated to be in compliance with national regulations. Discharge quality of mill effluent, especially Biochemical Oxygen Demand (BOD), is regularly monitored.		
<b>Objective Evidence:</b>	<p>The unit of certification has constructed a system made of 5 lagoons (1 for cooling, 2 for anaerobic digestion, and 2 for aerobic digestion) and one wastewater retention basin.</p> <p>However, no BOD/COD analyses are conducted to determine the efficiency of the lagoon treatment system. Moreover, the waste water retention basin at the end of the lagoon system has some leakages, hence there is possible contamination of adjacent Kasai River, especially considering that BOD/COD assessments are not done.</p> <p>Interviews with Company staffs revealed that laboratory equipment for BOD and COD analyses have been sourced but testing of the mill effluent is yet to begin.</p>		
<b>Corrections:</b>	<ol style="list-style-type: none"> <li>1. Make available the first analysis made during the ESIA's that were not yet available at the time of the audit</li> <li>2. Train the lab staff in the use of the equipment</li> <li>3. Install the equipment</li> <li>4. As soon as possible, start doing the analysis in-house</li> <li>5. Have third party analysis done to compare results</li> <li>6. Implement actions to resolve any deviations from the national standard</li> <li>7. Follow up on recommendations</li> </ol>		
<b>Root Cause Analysis:</b>	The effluent water analysis equipment was received in July 2021, the analysis equipment was not yet installed at the time of the audit, the staff was not trained, the results of the analysis carried out by the expert company "le carnet" were not yet available at the time of the audit.		
<b>Corrective Actions:</b>	<ol style="list-style-type: none"> <li>1. Effluent analyses done by CARNET are available</li> <li>2. A BOD-CDO analysis kit is purchased and installed</li> <li>3. Personnel responsible for performing the analyses are trained</li> </ol>		

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	<ol style="list-style-type: none"> <li>4. The first analyses are done and the results are available</li> <li>5. Samples are sent to the OCC lab to compare results</li> </ol>
<b>Assessment Conclusion:</b>	The corrective action plan has been reviewed and accepted. Effective implementation of the corrective action will be verified in the next assessment

Non-conformity			
<b>NCR Ref #</b>	2111113-202108-N7	<b>Date Issued</b>	03/09/2021
<b>Due Date</b>	Next Surveillance Audit	<b>Date of nonconformity Closure</b>	Open until Next Surveillance Audit
<b>Clause &amp; Category (Critical / Minor)</b>	Indicator 7.9.1 (Minor)		
<b>Statement of Nonconformity:</b>	There are no evidence of implementation of the plan to optimize renewable energy		
<b>Requirement Reference:</b>	A plan for improving efficiency of the use of fossil fuels and to optimize renewable energy is in place, monitored and reported.		
<b>Objective Evidence:</b>	<p>Brabanta has developed an action plan for the reduction of use of fossil fuels (Plan d'Actions pour la Reduction de l'Utilisation des Energies Fossiles, with document Ref.: PREF, Index 00, of 23/07/2021).</p> <p>However, this plan is neither being implemented, monitored, nor reported.</p>		
<b>Corrections:</b>	<ol style="list-style-type: none"> <li>1. Implementation of the action plan to reduce the use of fossil fuels</li> <li>2. Monitoring the plan</li> <li>3. Evaluate the effectiveness of actions</li> <li>4. Take corrective action as a result</li> <li>5. Follow-up of actions resulting from the fossil fuel use plan</li> </ol>		
<b>Root Cause Analysis:</b>	The fossil fuel plan was developed at the end of July 2021, the plan has just been created, only a month old and at the time of the audit the plan had not yet been implemented		
<b>Corrective Actions:</b>	<ol style="list-style-type: none"> <li>1. A corrective action plan is developed to implement the management plan</li> <li>2. Deadlines are set by the relevant departments</li> <li>3. Actions are monitored by Health Safety and Environment Responsible and Sustainable Development Responsible</li> <li>4. Implemented actions will be evaluated and monitored every six months</li> </ol>		
<b>Assessment Conclusion:</b>	The corrective action plan has been reviewed and accepted. Effective implementation of the corrective action will be verified in the next assessment		

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Non-conformity			
<b>NCR Ref #</b>	2111113-202108-N8	<b>Date Issued</b>	03/09/2021
<b>Due Date</b>	Next Surveillance Audit	<b>Date of nonconformity Closure</b>	Open until Next Surveillance Audit
<b>Clause &amp; Category (Critical / Minor)</b>	Indicator 2.2.1 (Minor)		
<b>Statement of Nonconformity:</b>	The company list of contractors does not include all the contractors and their details		
<b>Requirement Reference:</b>	A list of contracted parties is maintained		
<b>Objective Evidence:</b>	<p>Brabanta maintain a list of which include some of its contracted parties. This list indicates the name of the contractor and whether it comply with the company's requirements or not. This list however does not include all contracted parties and does not</p> <ul style="list-style-type: none"> <li>• provide any other details to enable the determination of those providing operational services to the site?</li> <li>• Labour including the following:               <ol style="list-style-type: none"> <li>i. Temporary employment</li> <li>ii. Short-term contracts; renewable contract</li> <li>iii. Fixed-term, project, task-based contracts or casual work</li> <li>iv. Loose Fruit collectors/ suppliers</li> </ol> </li> </ul>		
<b>Corrections:</b>	<ol style="list-style-type: none"> <li>1. Revise the list of all the contracting parties, including the type of service that each party provides to Brabanta, the relationship with Brabanta, the duration of the contract and the type of contract</li> <li>2. To include other contractors such as suppliers of loose fruit</li> <li>3. Regularly update the list</li> <li>4. Follow up on the updating of the list</li> </ol>		
<b>Root Cause Analysis:</b>	Omission of an activity column when creating the table. No precision on the nature of the contract with suppliers and other contractors, some contractors such as harvesters and suppliers of loose fruit do not appear in a particular way on the list of contractors		
<b>Corrective Actions:</b>	<ol style="list-style-type: none"> <li>1. The list of stakeholders has been updated</li> <li>2. The suppliers of the nuts have been included</li> <li>3. Updates will be made quarterly.</li> <li>4. Follow-up updates will be done every six months</li> </ol>		
<b>Assessment Conclusion:</b>	The corrective action plan has been reviewed and accepted. Effective implementation of the corrective action will be verified in the next assessment		

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Non-conformity			
<b>NCR Ref #</b>	2111113-202108-N9	<b>Date Issued</b>	03/09/2021
<b>Due Date</b>	Next Surveillance Audit	<b>Date of nonconformity Closure</b>	Open until Next Surveillance Audit
<b>Clause &amp; Category (Critical / Minor)</b>	Indicator 2.2.2 (Minor)		
<b>Statement of Nonconformity:</b>	Some of the contracts reviewed does not contain clause on meeting applicable legal requirements		
<b>Requirement Reference:</b>	All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal requirements, and this can be demonstrated by the third party.		
<b>Objective Evidence:</b>	Brabanta did not have contracts for all of its contracted third parties including its Loose Fruits Collectors to include specific clauses on meeting legal requirements. For example, for its Loose Fruit Collectors (LFCs), the company has a document "Achat Noix Villageouses of 17 August 2020" which was provided as its contact LFCs. However, this document does not include clauses on compliance with applicable legal requirements. The company's monitoring records also confirmed not all contracted parties were complying with applicable legal requirements.		
<b>Corrections:</b>	<ol style="list-style-type: none"> <li>1. Revise the protocol on the purchase of village loose fruits by integrating the clauses of the legal requirements</li> <li>2. Organize a meeting with all harvesters and suppliers of loose fruits</li> <li>3. Discuss and finalize the protocol with the participation of the harvesters and suppliers of loose fruits , or their representatives</li> <li>4. Post the protocol in each village, signed by the representatives and the Brabanta management.</li> <li>5. Review the Village loose fruits purchase protocol of 17 August 2020 by integrating clauses relating to compliance with applicable legal requirements (child and forced labour)</li> </ol>		
<b>Root Cause Analysis:</b>	Training and registration of villagers on clauses relating to compliance with applicable legal requirements (child labour and forced labour) were done but these clauses are not included in the contract "Protocole". The "Protocol" signed between Brabanta and the representatives does not contain any legal clauses.		
<b>Corrective Actions:</b>	<ol style="list-style-type: none"> <li>1. A meeting between the loose fruit collectors and the Public Relations and Communications Department</li> <li>2. Discussions are held with the interested parties, which lead to a compromise in the form of a protocol or contract for the purchase of loose fruits from the communities</li> <li>3. The contract is shared with all communities involved</li> <li>4. The contract is posted on the bulletin board in each village</li> </ol>		
<b>Assessment Conclusion:</b>	The corrective action plan has been reviewed and accepted. Effective implementation of the corrective action will be verified in the next assessment		

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Non-conformity			
<b>NCR Ref #</b>	2111113-202108-N10	<b>Date Issued</b>	03/09/2021
<b>Due Date</b>	Next Surveillance Audit	<b>Date of nonconformity Closure</b>	Open until Next Surveillance Audit
<b>Clause &amp; Category (Critical / Minor)</b>	Indicator 2.2.3 (Minor)		
<b>Statement of Nonconformity:</b>	Some of the contract documents reviewed does not clauses disallowing child, forced and trafficked labour		
<b>Requirement Reference:</b>	All contracts, including those for FFB supply, contain clauses disallowing child, forced and trafficked labour. Where young workers are employed, the contracts include a clause for their protection		
<b>Objective Evidence:</b>	<p>Brabanta did not have contracts for all of its contracted third parties including its Loose Fruit Collectors (LFCs) to include clauses disallowing child, forced and trafficked labour. For example, the company does not have FFB suppliers but LFCs who collect Palm fruits from the wild and sell to the company. LFCs confirmed that collection is mostly done at the family level which includes children with their parents. The company has a document "Achat Noix Villageouses of 17 August 2020" which was provided as its contract with LFCs. However, this document does not include clauses disallowing child, forced and trafficked labour and clauses for the protection for children who help their parents in loose fruit collection. The company provided evidence of sensitization trainings carried out on this RSPO indicator in the communities. However, sample of LFCs who met with the audit team denied of any knowledge on these trainings or knowledge of the "purchase agreement".</p>		
<b>Corrections:</b>	<ol style="list-style-type: none"> <li>1. Insert the clauses prohibiting child labour, forced labour and human trafficking in the policies to be disseminated</li> <li>2. Popularise this protocol and have it signed by those concerned</li> <li>3. Sensitise the harvesters supplying fruits on the prohibition of child labour, forced labour and human trafficking in the work related to the sale of fruits to Brabanta</li> <li>4. Follow-up</li> <li>5. Conduct regular evaluation to ensure that monitoring is done properly and correctly.</li> <li>6. Review the protocol "Achat Noix Villageoises du 17 août 2020".</li> <li>7. Disseminate the protocol ,Raise awareness among collectors</li> </ol>		
<b>Root Cause Analysis:</b>	<p>Training and registration of villagers on clauses relating to compliance with applicable legal requirements. (Child and forced labour) but these clauses are not included in the 'Protocol' contract, as there is no control over the harvesters supplying the fruits during harvesting operations and sales of loose fruits at village level because for Brabanta the agreement covers the weighbridge and the port, Brabanta does not monitor what happens at village level during harvesting operations and the transport of fruits</p>		
<b>Corrective Actions:</b>	<ol style="list-style-type: none"> <li>1. Clauses prohibiting child labor and human trafficking have been included in the contract</li> <li>2. Meetings to disseminate the protocol to the communities have been held</li> </ol>		



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	<ol style="list-style-type: none"> <li>3. The protocol has been reviewed and distributed to all interested parties</li> <li>4. Brabanta will conduct regular monitoring visits to ensure that their supply base follows the agreed regulations.</li> <li>5. Awareness-raising sessions are regularly held with the cutters who supply loose fruits</li> </ol>
<b>Assessment Conclusion:</b>	The corrective action plan has been reviewed and accepted. Effective implementation of the corrective action will be verified in the next assessment

Non-conformity			
<b>NCR Ref #</b>	2111113-202108-N11	<b>Date Issued</b>	03/09/2021
<b>Due Date</b>	Next Surveillance Audit	<b>Date of nonconformity Closure</b>	Open until Next Surveillance Audit
<b>Clause &amp; Category (Critical / Minor)</b>	Indicator 3.3.2 (Minor)		
<b>Statement of Nonconformity:</b>	Most of the workers interviewed are not aware of RSPO		
<b>Requirement Reference:</b>	A mechanism to check consistent implementation of procedures is in place.		
<b>Objective Evidence:</b>	<p>Brabanta’s mechanism for checking consistent implementation of its procedures has not been done to cover all relevant procedures and the existing mechanism was found not to be effective. The company uses training, monitoring and evaluation to check the effectiveness of the implementation of its procedures. It has general procedures for handling non-conformities which applies to the results of monitoring and evaluation (procédures de traitement de non-conformités réelles ou potentielle of 18/06/2015. However, this monitoring and evaluation of the effectiveness of the implementation of the company’s procedures has not been carried out in all relevant units /operations of the company. For example, though there is an existing form of an action plan for non-conformities of SK Protection, the company had not carried out any monitoring and evaluation for this contracted party. Field observations by the audit team in the presence of the managers sighted several instances of workers’ practices inconsistent with the company’s procedures. For example, in N11, the manner FFB carriers’ were carrying their machetes and the cutting of FFB stack by harvesters among other examples were all found not to be consistent with the company’s procedures.</p> <p>Most workers both in the mill and in the field asked what is RSPO?</p>		
<b>Corrections:</b>	<ol style="list-style-type: none"> <li>1. Strengthen communication and intensify information meetings to explain what RSPO is</li> <li>2. Establish an effective RSPO communication system to attract the attention of all staff to the RSPO</li> <li>3. Information about RSPO concepts disseminated by the sustainability management department should be relayed to other departments by all departments by all responsible persons.</li> <li>4. Set up a communication system that allows the transmission of information throughout the chain of command to make RSPO-related information easy to understand and accessible</li> <li>5. Continue ensuring all workers receive training on their respective procedures</li> </ol>		

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	<ol style="list-style-type: none"> <li>6. Conduct regular monitoring to ensure all workers follow their procedures</li> <li>7. Draft and implement an action plan where non-conformities are observed</li> </ol>
<b>Root Cause Analysis:</b>	Lack of follow-up on the acquisition of RSPO knowledge , the RSPO communication system put in place is not effective, lack of interest in the RSPO process by a large part of the staff, especially the workers, lack of circulation of information transmitted by the sustainable development management department
<b>Corrective Actions:</b>	<ol style="list-style-type: none"> <li>1. RSPO re-dissemination and explanation meetings are integrated into the outreach program</li> <li>2. A meeting is held to re-explain the RSPO message to department heads</li> <li>3. Training on RSPO is planned. The sustainable development department trains managers who in turn train employees</li> <li>4. Awareness is raised during morning calls</li> <li>5. Regular trainings are held to ensure the workers understand their procedures</li> <li>6. Regular monitoring on procedure implementation will be done. Actions plans are written and implemented where non-conformities are observed.</li> </ol>
<b>Assessment Conclusion:</b>	The corrective action plan has been reviewed and accepted. Effective implementation of the corrective action will be verified in the next assessment

Non-conformity			
<b>NCR Ref #</b>	2111113-202108-N12	<b>Date Issued</b>	03/09/2021
<b>Due Date</b>	Next Surveillance Audit	<b>Date of nonconformity Closure</b>	Open until Next Surveillance Audit
<b>Clause &amp; Category (Critical / Minor)</b>	Indicator 5.1.1 (Minor)		
<b>Statement of Nonconformity:</b>	The company has not made the current and previous prices publicly available to the Loose Fruit Collectors		
<b>Requirement Reference:</b>	Current and previous period prices paid for FFB are publicly available and accessible by smallholders.		
<b>Objective Evidence:</b>	Brabanta did not make current and previous prices paid to Loose Fruit Collectors (LFCs) publicly available and accessible. The company does not have FFB suppliers but source from LFCs. The company provided a document "Achat Noix Villageouses of 17 August 2020" from its office which contained the current price as evidence for this requirement. Though LFCs interviewed were aware of the previous and the current prices paid to them, the evidence provided by the company from its office did not meet this requirement for making the current and previous prices paid to LFCs publicly available and accessible.		
<b>Corrections:</b>	<ol style="list-style-type: none"> <li>1. Create a document that traces the history of fruits prices from 2019 onwards in the local language</li> <li>2. Hold a meeting with the fruits harvesters and present the document to them in the form of a table</li> <li>3. Discuss with the collectors (local language)</li> <li>4. Post all prices to make them accessible to all</li> </ol>		

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<b>Root Cause Analysis:</b>	Prices were not recorded, some of the fruits harvesters did not admit to being informed of prices, representatives and village leaders did not communicate the price to others
<b>Corrective Actions:</b>	<ol style="list-style-type: none"> <li>1. A table of price changes since 2019 is created.</li> <li>2. The document was presented at a meeting</li> <li>3. The document was posted in each village, at the weighbridge and at Beach Brabanta</li> <li>4. The document will be updated with every price change</li> </ol>
<b>Assessment Conclusion:</b>	The corrective action plan has been reviewed and accepted. Effective implementation of the corrective action will be verified in the next assessment

<b>Non-conformity</b>			
<b>NCR Ref #</b>	2111113-202108-N13	<b>Date Issued</b>	03/09/2021
<b>Due Date</b>	Next Surveillance Audit	<b>Date of nonconformity Closure</b>	Open until Next Surveillance Audit
<b>Clause &amp; Category (Critical / Minor)</b>	Indicator 5.1.5 (Minor)		
<b>Statement of Nonconformity:</b>	The company could not demonstrate they have a contract with an agreed time frame with the Loose Fruit Collectors		
<b>Requirement Reference:</b>	Contracts are fair, legal and transparent and have an agreed timeframe.		
<b>Objective Evidence:</b>	Brabanta did not demonstrate to have contract with Loose Fruit Collectors (LFCs) which is legally enforceable with agreed time frame. The company provided evidence of a "purchase agreement" (Achat Noix Villageouses of 17 August 2020) with LFCs signed by the General Manager. However, it could not justify what makes the Achat Noix Villageouses a legal document. Apart from the company's General Managers signature, the document has signatures of "representatives of the communities" who according to the company is evidence that the signees have "seen the document". The document also had no time frame. Representatives of LFCs invited by the company to meet with the audit team said they have no idea of the existence of the document.		
<b>Corrections:</b>	<ol style="list-style-type: none"> <li>1. Organize a meeting with all the fruits harvesters suppliers</li> <li>2. Present the village fruits purchase protocol to the harvesters suppliers</li> <li>3. Discuss the document to get the consent of the fruit harvesters</li> <li>4. Have the document approved by all parties involved.</li> <li>5. Share the document for wide distribution</li> <li>6. Have collectors sign the protocol</li> </ol>		
<b>Root Cause Analysis:</b>	All representatives of the collectors have signed the protocol but one of the documents presented to the auditors only had the signature of the Director General of Brabanta and the auditors thought that this document was not legal		
<b>Corrective Actions:</b>	<ol style="list-style-type: none"> <li>1. A meeting was held with the loose fruit collectors and their representatives</li> <li>2. A price setting procedure was created with the consent of all. A consensus was reached after a few hours of discussion</li> </ol>		

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	<ol style="list-style-type: none"> <li>3. The procedure was adopted by all participants</li> <li>4. The procedure is shared and posted in the communities</li> <li>5. The protocol was signed by the community representatives by December 2022</li> </ol>
<b>Assessment Conclusion:</b>	The corrective action plan has been reviewed and accepted. Effective implementation of the corrective action will be verified in the next assessment

Non-conformity			
<b>NCR Ref #</b>	2111113-202108-N14	<b>Date Issued</b>	03/09/2021
<b>Due Date</b>	Next Surveillance Audit	<b>Date of nonconformity Closure</b>	Open until Next Surveillance Audit
<b>Clause &amp; Category (Critical / Minor)</b>	Indicator 6.7.2 (Minor)		
<b>Statement of Nonconformity:</b>	Some of the workers interviewed during the audit period could not demonstrate knowledge on the procedures		
<b>Requirement Reference:</b>	Accident and emergency procedures are in place and instructions are clearly understood by all workers. Accident procedures are available in the appropriate language of the workforce. Assigned operatives trained in first aid are present in both field and other operations, and first aid equipment is available at worksites. Records of all accidents are kept and periodically reviewed.		
<b>Objective Evidence:</b>	<p>Brabanta has Emergency procedures for identified emergencies written in the French language and explained to workers in the local language during toolbox Talks. However, several workers at critical areas of emergency could not adequately demonstrate understanding of these procedures. For example, at the fuel station as Sanga Sanga,</p> <p>Also, the company has trained and assigned operatives to administer first aid when required. In the field, First Aid kits are provided only at the Division offices and rely on emergency number to call for First Aid assistance when required. The system in its present form was found to be ineffective as workers were not having the required call credit on their phones to make emergency calls. For example, a test done at K10A. The company indicated to have plans to install Toll Free for emergency numbers.</p>		
<b>Corrections:</b>	<p>Brabanta received confirmation from Airtel for the free emergency number</p> <ol style="list-style-type: none"> <li>1. Make a first aid kit available to all field teams</li> <li>2. Set up a toll-free number that will allow workers to call even without credit in their phones</li> <li>3. Make all staff aware of this number</li> <li>4. Post this number in all public places and accessible to all staff to make the number accessible</li> <li>5. Make sure that the first aider is easily reachable and has easy access to the first aid kit</li> <li>6. Evaluate the effectiveness of the system and improve where possible if there are any discrepancies</li> </ol>		

<b>Root Cause Analysis:</b>	Some workers do not have mobile phone credit and therefore could not call the emergency number, Difficulty to contact the first aider in case of emergency, no first aid kit available at the workplace, only one kit per section
<b>Corrective Actions:</b>	<ol style="list-style-type: none"> <li>1. A portable first aid kit is made available to each plantation supervisor</li> <li>2. An emergency toll-free number is set up for everyone to call in case of emergency</li> <li>3. The number is broadcast by outlook for posting in all public places</li> <li>4. An evaluation of the effectiveness of the system will be done each month at the health and safety committee meeting</li> </ol>
<b>Assessment Conclusion:</b>	The corrective action plan has been reviewed and accepted. Effective implementation of the corrective action will be verified in the next assessment

<b>Opportunity for Improvements</b>	
<b>OFI</b>	<b>Description</b>
<b>OFI 1</b>	<p><b>Indicator 7.4.3</b></p> <p>A nutrient recycling strategy is in place, which includes the recycling of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), palm residues and optimal use of inorganic fertilizers.</p> <p><b>Details</b></p> <p>A nutrient recycling strategy that includes use of EFB, and POME is in place. However, at the time of the audit, no evidence was found to support the use of POME. Additionally, there are no clearly assigned, and appropriate zones for storage of EFB and fiber. Fiber storage zones behind the mill pose a contamination risk to the neighboring Kasai River.</p>
<b>OFI 2</b>	<p><b>Indicator 7.8.2</b></p> <p>Water courses and wetlands are protected, including maintaining and restoring appropriate riparian and other buffer zones in line with 'RSPO Manual on BMPs for the management and rehabilitation of riparian reserves' (April 2017).</p> <p><b>Details</b></p> <p>Water courses and wetlands are protected. Actions such as clearly marking of riparian zones have been undertaken. However, Brabanta does not conduct water analysis of neighbouring rivers: Kasai, Lumbundji to determine whether their activities are impacting on the rivers.</p>
<b>OFI 3</b>	<p><b>Indicator 7.12.6</b></p> <p>All rare, threatened or endangered (RTE) species are protected, whether or not they are identified in an HCV assessment. A programme to regularly educate the workforce about the status of RTE species is in place. Appropriate disciplinary measures are taken and documented in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect, trade, possess or kill these species.</p> <p><b>Details</b></p> <p>A monitoring programme is in place and daily reporting sheets have been prepared to capture field observations (e.g. number of trees cut, clearings sited, fires, location/site/estate/Block, number/surface area, person who committed the act, Village/Camp, Comments).</p>

	<p>Several reports for the year 2020 and 2021 were made available at the time of the audit. Sensitization campaigns are held in Camps and communities on RTE and HCV.</p> <p>However, the sheet does not capture, siting and/or killings of RTE as identified in HVC assessment.</p>
<b>OFI 4</b>	<p><b>Indicator 2.1.3</b></p> <p>Legal or authorised boundaries are clearly demarcated and visibly maintained, and there is no planting beyond these legal or authorised boundaries.</p> <p><b>Details</b></p> <p>Brabanta has clearly demarcated and maintained the boundaries of its concession as legally allocated on maps attached the concession and also on the ground. The company’s boundaries are maintained by motorable roads and numbers of concrete pillars. However, some of the boundary pillars are either removed or defaced. For example, the follow boundaries in Sanga Sanga.</p> <p>PMB (defaced) S 4.399599; E20.205022  PBM (defaced) S 4.360330; E 20.201557  PMB (removed) S 4.369338; E 20.202920</p> <p>It is observed that, the company will benefit from replacement of removed and defaced concrete boundary pillars</p>
<b>OFI 5</b>	<p><b>Indicators 5.2.1</b></p> <p>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</p> <p><b>Details</b></p> <p>Brabanta consults with communities where its loose fruit collectors are located to assess their needs for support including support for repair of their roads. However, the company’s stakeholder list has not identified its Lose Fruit Collectors as interested parties to assess their needs for support</p>

Positive Findings	
PF #	Description
PF 1	Positive attitude from all staff toward the certification process

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

Non-conformity			
NCR Ref #		Date Issued	
Due Date		Date of nonconformity Closure	
Clause & Category (Critical / Minor)			
Statement of Nonconformity:			

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<b>Requirement Reference:</b>	
<b>Objective Evidence:</b>	
<b>Corrections:</b>	
<b>Root Cause Analysis:</b>	
<b>Corrective Actions:</b>	
<b>Assessment Conclusion:</b>	

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

**3.3.2 Summary of the Nonconformities and Status**

<b>CAR Ref.</b>	<b>Category (Critical / Minor)</b>	<b>P&amp;C Indicator</b>	<b>Issued Date</b>	<b>Status &amp; Date (Closure)</b>
2111113-202108-M1	Critical	3.6.1	03/09/2021	Closed, 23/12/2021
2111113-202108-M2	Critical	3.6.2	03/09/2021	Closed, 23/12/2021
2111113-202108-M3	Critical	5.1.2	03/09/2021	Closed, 23/12/2021
2111113-202108-M4	Critical	6.1.5	03/09/2021	Closed, 23/12/2021
2111113-202108-M5	Critical	6.2.4	03/09/2021	Closed, 23/12/2021
2111113-202108-M6	Critical	6.3.1	03/09/2021	Closed, 23/12/2021
2111113-202108-M7	Critical	6.7.1	03/09/2021	Closed, 23/12/2021
2111113-202108-M8	Critical	6.7.3	03/09/2021	Closed, 23/12/2021
2111113-202108-M9	Critical	7.2.7	03/09/2021	Closed, 23/12/2021
2111113-202108-M10	Critical	7.10.1	03/09/2021	Closed, 23/12/2021
2111113-202108-M11	Critical	3.8.5	03/09/2021	Closed, 23/12/2021
2111113-202108-M12	Critical	3.8.6	03/09/2021	Closed, 23/12/2021
2111113-202108-M13	Critical	3.8.7	03/09/2021	Closed, 23/12/2021
2111113-202108-M14	Critical	3.8.12	03/09/2021	Closed, 23/12/2021
2111113-202108-M15	Critical	3.8.9	03/09/2021	Closed, 23/12/2021
2111113-202108-N1	Minor	3.7.3	03/09/2021	Open
2111113-202108-N2	Minor	6.2.6	03/09/2021	Open
2111113-202108-N3	Minor	6.3.2	03/09/2021	Open

2111113-202108-N4	Minor	6.4.1	03/09/2021	Open
2111113-202108-N5	Minor	6.5.3	03/09/2021	Open
2111113-202108-N6	Minor	7.8.3	03/09/2021	Open
2111113-202108-N7	Minor	7.9.1	03/09/2021	Open
2111113-202108-N8	Minor	2.2.1	03/09/2021	Open
2111113-202108-N9	Minor	2.2.2	03/09/2021	Open
2111113-202108-N10	Minor	2.2.3	03/09/2021	Open
2111113-202108-N11	Minor	3.3.2	03/09/2021	Open
2111113-202108-N12	Minor	5.1.1	03/09/2021	Open
2111113-202108-N13	Minor	5.1.5	03/09/2021	Open
2111113-202108-N14	Minor	6.7.2	03/09/2021	Open

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

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

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

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

<b>Stakeholders contacted</b>		
<b>Type of Stakeholder</b> (e.g. Internal, Union, Contractor, Governmental Department, NGO, External, Communities)	<b>Stakeholder name / organization</b>	<b>Means of communication</b> (e.g. face to face interview, email, phone interview, comment from public notice)
Communities	Ndjenbe, Mumbende, Kayaya, Ngoyi, Malango, Kalembe	Face to face interview
Workers Representatives	GS, CSC, ACTION, UNTC	Face to face interview
Gender Committee	Workers	Face to face interview
Government Agency	Administrator of Territory,	Face to face interview
Government Agency	Head of Sector, Mapangu	Face to face interview
Non-Governmental Organisation	GRAIN	E-mail
Non-Governmental Organisation	Greenpeace	E-mail



Non-Governmental Organisation	World Rainforest Movement	E-mail
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Stakeholders comment	
<b>SH1</b>	<p><b>Feedbacks:</b> Communities            Communities complain of a lack of cordial relationship with the company as most of their request are not attended to by the company. There are no issues of land dispute between the company and any of the communities. However, they complained of the company not sharing their policies and procedure with them.</p> <p><b>Audit Team verification and response:</b>            It was confirmed at the stakeholder meeting that the company has shared their policies and procedures with the communities as one of the community leaders displayed the company's communication and consultations procedure. Later they all acknowledge receiving the documents and also confirmed knowing the community relations officer (CLO). Follow up with management confirmed with evidence of stakeholder engagement with signed attendance by the community leaders. The company meets every three months to discuss issues of concern with the community</p>
<b>SH2</b>	<p><b>Feedbacks:</b> Workers Representatives            Their responsibility is to serve as the bridge between management and workers and also ensure workers' rights are protected. Relationship between the union and management is strained because although they meet with management ones every three months, any other unplanned meeting with management does not receive a response even when they send an official notice. Copies of the minutes of meetings are not shared with the union and they are not involved in any negotiation of the workers' salaries. However, the company shares all policies and procedures with the union. Also copies of any action taken against workers are shared with the union. The issue on the sharing of the minutes of meeting records has been raised as a NC</p> <p><b>Audit Team verification and response:</b>            Management has an action plan in place which aims at involving workers' representatives in all salary negotiations and also share copies of the minutes of meetings with the workers. Also management indicated that some of the unplanned minutes requested by the union does not receive a response because the union fails to follow the chain of command. However they will be meeting with the union to address all such concerns</p>
<b>SH3</b>	<p><b>Feedbacks:</b> Gender Committee            The company has a Gender Committee in place.            They have no issues of concern</p> <p><b>Audit Team verification and response:</b> N/A</p>
<b>SH4</b>	<p><b>Feedbacks:</b> Administrator of Territory            The Administrator ensure a good working relationship between company and the communities and workers.            There are no issues of concern</p> <p><b>Audit Team verification and response:</b> N/A</p>
<b>SH5</b>	<p><b>Feedbacks:</b> Head of Sector, Mapangu            He ensure a good working relationship between company and the communities and workers. There are no issues of concern</p> <p><b>Audit Team verification and response:</b> N/A</p>

<b>SH6</b>	<b>Feedbacks: GRAIN</b> The audit team received no feedback from stakeholder although a mail requesting for their comment regarding the initial certification of Brabanta SA was sent to them through their official email grain@grain.org
	<b>Audit Team verification and response:</b> N/A
<b>SH7</b>	<b>Feedbacks: Greenpeace</b> The audit team received no feedback from stakeholder although a mail requesting for their comment regarding the initial certification of Brabanta SA was sent to them through <a href="mailto:cecile.leuba@greenpeace.org">cecile.leuba@greenpeace.org</a>
	<b>Audit Team verification and response:</b> N/A
<b>SH8</b>	<b>Feedbacks: GRAIN</b> The audit team received no feedback from stakeholder although a mail requesting for their comment regarding the initial certification of Brabanta SA was sent to them through their official email wrm@wrm.org.uy
	<b>Audit Team verification and response:</b> N/A

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
Brabanta SA	2015	1,508.59	Yes	No	Compliance

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

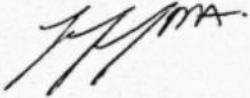
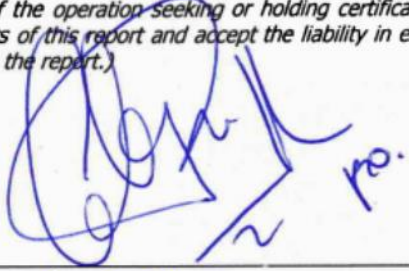
### 3.5 Impartiality and conflict of interest

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

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**Formal Signing-off of Assessment Conclusion and Recommendation**

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

Report prepared by	Acceptance of Assessment Conclusion
<b>Name: Dennis Acquah</b>	<b>Name: PASCAL DESNEDT</b>
<b>Company Name: BSI</b>	<b>Company Name: BRABANTA SA</b>
<b>Title: Lead Auditor</b>	<b>Title: GENERAL MANAGER</b>
<b>Signature:</b> 	<b>Signature:</b> <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> 
<b>Date: 26/12/2021</b>	<b>Date: 07.01.2022</b>

**Appendix A: Summary of Findings**

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

		<p>Stock areas (HSC)</p> <p>4. Continuous improvement plan</p> <p>5. The pollution prevention and reduction plan</p>	
1.1.2	<p>Information is provided in appropriate languages and accessible to relevant stakeholders.</p> <p>- Minor compliance -</p>	<p>Most of the company's documents reviewed are written in French which is the official written and spoken language in Congo DR. However, some of the documents made available to the audit team for review were also written in Kikongo the local language commonly spoken by the communities and workers. Interview with 19 workers in Sanga Sanga estate (Block A6, C7,), 11 workers in Kadima estate (Block D9) and 44 workers in Kanaiga estate all confirmed the policies and other information are explained to them in the Kikongo local language at their early morning muster.</p>	Complied
1.1.3	<p><b>(C)</b> Records of requests for information and responses are maintained.</p> <p>- Critical (Major) compliance -</p>	<p>Brabanta indicated they have not received any formal or written request for information from their stakeholders or from the general public at the time of the audit. However, the company holds quarterly meetings with the different communities where various issues of interest are raised and discussed. It's at such meeting that communities make their request known to the company.</p> <p>Review of Minutes of Quarterly Meeting between Brabanta and Communities dated 08/02/2021. Some of the request made by the communities include</p> <ol style="list-style-type: none"> <li>1. Request for an increase in the quantities of oil giving to the communities</li> <li>2. Request for loans for the community members</li> </ol> <p>The meeting was attended and signed by 24 community members and four community leaders.</p>	Complied
1.1.4	<p><b>(C)</b> Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by a nominated management official.</p>	<p>The company has a documented external communication procedure dated 31/07/2019 and approved by the Director General. The objective of the procedure is to identify the company's external stakeholders and</p>	Complied

	<p>- Critical (Major) compliance -</p>	<p>to determine the means by which they can get in touch within the framework of communication and consultation with them. The procedure is applicable to all Brabanta external stakeholders which includes communities, NGOs, government, local and traditional authorities and loose fruit collectors. The document identifies the Director of Public Relations and Communication (DRPC) as the main actor in terms of communication and consultation with external stakeholder at the local level. He meets the communities and give out information from the company. The document also identified the Secretary General as the spokesperson for the company with the government and all other parties. This was confirmed during community consultations where they identified the DRPC as the company representative who shares and explains all information to them. They indicated also that the DRPC takes all their request to the company.</p> <p>The company also has a documented Consultation and Communications procedures for internal stakeholders dated 07/08/2019 and signed by the Director General. The aim of the internal procedure to ensure accessible and transparent communication between Brabanta and all of its internal stakeholders. The procedure is applicable to Brabanta S.A, namely: Plantations, Administration in Kinshasa. Interview with the workers union confirmed the procedure has been shared and explained to them.</p>	
<p>1.1.5</p>	<p>There is a current list of contact and details of stakeholders and their nominated representatives.</p> <p>- Minor compliance -</p>	<p>The company has a documented list of its stakeholders which was made available to the audit team. The list contains information on the Name, function and contact address of the various stakeholders. Some of the stakeholders selected during the audit period for consultations include FFB suppliers, Communities, Workers Union, Gender Committee, Administrator of territory and Head of Mapangu sector.</p>	<p>Complied</p>
<p><b>Criteria 1.2:</b> The unit of certification commits to ethical conduct in all business operations and transactions.</p>			

1.2.1	<p>A policy for ethical conduct is in place and implemented in all business operations and transactions, including recruitment and contracts.</p> <p>- Minor compliance -</p>	<p>The company has a policy for ethical conduct in place titled Brabanta Employee code of ethics and dated April 2019. The policy is applicable to all consultants and suppliers when doing business with the company or on behalf of the company. This policy is publicly displayed on all the notices boards of the company and explained to the workers during their morning musters as confirmed by workers interviewed in all three estates. The policy has also been shared with the communities and explained to their understanding. This was confirmed by the communities who were engaged during the audit period.</p>	Complied
1.2.2	<p>A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice.</p> <p>- Minor compliance -</p>	<p>Brabanta communicates the policy by displaying on the notice boards and on the company websites (<a href="#">Commitments   Socfin</a>). Copies of the policy is shared with the workers and they receive daily sensitization during their morning meetings. Interview with the workers union confirm the policy has been shared with them also they are sensitized on it during their early morning muster.</p>	Complied
<p><b>Principle 2: Operate legally and respect rights</b>          Implement legal requirements as the basic principles of operation in any jurisdiction.</p>			
<p><b>Criteria 2.1:</b> There is compliance with all applicable local, national and ratified international laws and regulations.</p>			
2.1.1	<p><b>(C)</b> The unit of certification complies with applicable legal requirements.</p> <p>- Critical (Major) compliance -</p>	<p>Brabanta complies with a number of applicable legal requirements. The company maintains a list of legal requirements applicable to its operation to enhance its compliance. The list includes complete listing of all applicable national laws applicable international agreements to which the country has signed to be part. It uses the internet and subscription of official journals to research on new laws and updates. For example, the staff responsible to this update provided evidence to demonstrate the last legal update research done from <a href="http://www.legalnet.cd/legislation/">www.legalnet.cd/legislation/...</a> on 6/5/2020. The last update of the laws was done on 28 August 2021 on Labour and the Environmental</p>	Complied

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		<p>The company also provided evidence of compliance with these applicable requirements to include statutory reporting, statutory payments, the use of approved third-party verification among others. Samples of these records were reviewed. Examples include:</p> <ul style="list-style-type: none"> <li>• up-to-date full payment on water extraction done for invoice E6686424 of 19/7/2021 by a bank transfer per Trust Merchant Bank transaction \$0101nft212030152 of 22/7/2021</li> <li>• Full payment for the company tax invoice H1365976 of 28/06/2021 Full payment per Rawbank bank deposit # 755381 of 30 June 2021,</li> <li>• full payment Production Tax invoice # A 127413 PK and Full payment per ref 0807135BC5FB of 8/7/2021</li> </ul>	
2.1.2	<p>A documented system for ensuring legal compliance is in place. This system has a means to track changes to the law and also includes listing and evidence of legal due diligence of all contracted third parties, recruitment agencies, service providers and labour contractors.</p> <p>- Minor compliance -</p>	<p>Brabanta has a documented system for ensuring legal compliance. This includes the appointment of a legal staff with responsibilities to ensuring the company's compliance. The system includes the maintenance of documented summaries of all the applicable legal requirements. That is "Veille Reglementaire Implicant les Activites de la Brabanta". This document includes the title of the law, its relevance to the company and what the company has to do, and for each relevant article indication of whether the company is in compliance or not.</p> <p>Legal compliance and non-compliances are monitored through legal audits. For those legally requirements found to be out of compliance, recommendations for action and corresponding action plan made. For example, the payment of the minimum wage where a recommendation is made to get further evidence from the Human Resources Manager. These were confirmed from interviews with staff and review of records For example, "Les Structures Conformes et Ce Non Conformes Aus Exigences Juridiques Apres Analyse des Leur Dossiers" of 08/06/2021</p>	Complied



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<p>2.1.3</p>	<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>Brabanta has clearly demarcated and maintained the boundaries of its concession as legally allocated on maps attached to the concession and also on the ground. The company's boundaries are maintained by motorable roads and numbers of concrete pillars. The company had not planted beyond its legal boundaries. There was evidence of tempering of the erected boundary pillars and in some cases removal which according to the company is by the communities. However, the presences of the clearly established roads as boundaries made all boundaries visible and intact. This was verified by the review of records of the legal concessions and their maps and field verification of selected boundaries by Global Position System (GPS). For example,</p> <ol style="list-style-type: none"> <li>1. "Certificat d'enregistrenet d'une concession Perpetuelle – Malembe Area # 012648 and</li> <li>2. # K2/2I Folio 24 Certificat d'enregistranent d'une concession original Territoire Ilebo – Sanga Sanga, R/7/4 &amp; Kadema R.7.5.7</li> </ol> <p>Example of boundaries and pillars verified include:</p> <p>Sanga Sanga Estate:</p> <ol style="list-style-type: none"> <li>1. PBM 27/C: S 4.344130; E 20.205245</li> <li>2. PMB S 4.399599; E20.205022 (This pillar is defaced)</li> <li>3. PBM 3 S 4.360910; E 20.196824;</li> <li>4. PBM S 4.360330; E 20.201557 (This pillar is defaced)</li> <li>5. PMB S 4.369338; E 20.202920 (This pillar is removed)</li> </ol> <p>The audit team raised an OFI on these defaced and removed pillars for the company's necessary action.</p>	<p>OFI</p>
<p><b>Criteria 2.2:</b> All contractors providing operational services and supplying labour, and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements.</p>			
<p>2.2.1</p>	<p>A list of contracted parties is maintained.</p> <p>- Minor compliance -</p>	<p>Brabanta maintain a list which include some of its contracted parties. This list indicates the name of the contractor and whether it comply with</p>	<p>Non-compliance</p>

		<p>the company's requirements or not. This list however does not include all contracted parties and does not</p> <ul style="list-style-type: none"> <li>• Provide any other details to enable the determination of those providing operational services to the site?</li> <li>• Labour including the following:             <ol style="list-style-type: none"> <li>1. Temporary employment</li> <li>2. Short-term contracts; renewable contract</li> <li>3. Fixed-term, project, task-based contracts or casual work</li> <li>4. Loose Fruit collectors/ suppliers</li> </ol> </li> </ul>	
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>Brabanta SA did not have contracts for all its contracted third parties including its Loose Fruits Collectors (LFCs) to include specific clauses on meeting legal requirements. For example, for its loose fruit collectors, the company has a document "Achat Noix Villageouses of 17 August 2020" However, this document does not include clauses on compliance with applicable legal requirements.</p>	Non-compliance
2.2.3	<p>All contracts, including those for FFB supply, contain clauses disallowing child, forced and trafficked labour. Where young workers are employed, the contracts include a clause for their protection.</p> <p>- Minor compliance -</p>	<p>Brabanta did not have contracts for all contracted third parties including LFCs to include clauses disallowing child, forced and trafficked labour. For example, the company does not have FFB suppliers but LFCs who collect Palm fruits for sale to the company. Interview LFCs from the communities confirmed the use of their children in the collection operation. The company has only a document "Achat Noix Villageouses of 17 August 2020" However, this document did contain clauses disallowing child, forced and trafficked labour and clauses for the protection for children who help their parents in loose fruit collection.</p> <p>The company maintained that these issues though provided in the document are shared with the communities. They also sensitize them on these issues required by this indicator and provided records of log of meetings to back this claim. For example, Accuse de reception Chef Du Village Malembe PLC, Chef Au Village Kanganyi-Mukatshi. However, a</p>	Non-compliance

		sample of LFCs the audit team had conversation in a meeting during the audit indicated to have no knowledge of the trainings by the company or the knowledge of the "Achat Noix Villageouses.	
<b>Criteria 2.3:</b> All FFB supplies from outside the unit of certification are from legal sources.			
2.3.1	<p><b>(C)</b> For all directly sourced FFB, the mill requires:</p> <ul style="list-style-type: none"> <li>• Information on geo-location of FFB origins</li> <li>• Proof of the ownership status or the right/claim to the land by the grower/smallholder</li> <li>• Where applicable, valid planting/operating/trading license, or is part of a cooperative which allows the buying and selling of FFB</li> </ul> <p>- Critical (Major) compliance -</p>	<p>Brabanta has the geo-location for the origin of all the loose palm fruits directly supplied by its FFB Collectors (in this context The communities goes round and collect fruitlets that have falling on the ground from the bunches). Loose fruit collection is done on community lands from Oil Palm trees in the wild and is of community ownership. These areas are not located protected areas or national reserved forest. The company recognises individual communities as it units of supplier and deals with them as such through their representatives on communications and acknowledgment of specific issues because according to the company, these are the community members who can read and write. The company therefore has identified individual community only with unique community identification numbers and their associated geo-locations of Palm fruits collection. Maps and geo-locations of the 17 community collection areas including their unique community identification numbers were available for review during the audit. For example, Imbango village, Identification number 63, geo-location Longitude 20.39103988290; Latitude -4.3917504773, Kadima Port village, ID number 75 Longitude 20.22871071030; Latitude -4.39415424145.</p> <p>However, the sale of Palm fruits is done</p> <ol style="list-style-type: none"> <li>1. Directly by individual collector led by their representatives and</li> <li>2. Indirectly through intermediaries/agents who buy from individual collectors in the communities and sell to the company. The company also has a list of these individuals who sell loose fruit directly to the company led by their representatives.</li> </ol>	Complied

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. - Minor compliance -	See finding for section 2.3.1 above	Complied
<p><b>Principle 3: Optimise productivity, efficiency, positive impact and resilience</b>          Implement plans, procedures and systems for continuous improvement.</p>			
<p><b>Criteria 3.1:</b> There is an implemented management plan for the unit of certification that aims to achieve long-term economic and financial viability.</p>			
3.1.1	<p><b>(C)</b> A business or management plan (minimum three years) is documented that includes, where applicable, a jointly developed business case for Scheme Smallholders. - Critical (Major) compliance -</p>	<p>A business plan of a period of 10 years has been developed for the entire Socfin Group. At the level of Brabanta, this business plan has been broken down into a 5 years plan titled: <i>Plan d’Affaires Brabanta</i>, dated December 2020. The major components of the plan include: production/yield, agronomy, industrial processing and investments (costs and cost projections), sales of CPO and financial indicators.</p> <p>No associate smallholders or other structured smallholder scheme applies to the unit of certification.</p> <p>The Brabanta Business Plan is reviewed based on annual budgets, production projections, e.g. fertilizer, etc.</p> <p>Additionally, supply of FFBS from smallholders is really minimal compared to own production (500 tonnes/day from own plantations) and most FFBS from loose fruit collectors (LFC) are from wild palms (250-300 tonnes from LFC/month). Therefore, at the mill there is careful mixing of wild palms with improved varieties to reduce impact on milling processes.</p> <p>Interviews with management revealed that this year, a participatory mapping was conducted prior to the budgetary session as a means to identify and better include smallholder concerns.</p>	Complied

3.1.2	<p>An annual replanting programme projected for a minimum of five years with yearly review, is available.</p> <p>- Minor compliance -</p>	<p>The Brabanta plantation is a replanting of an old and abandoned plantation. Replanting of the current planted area took place between 2008-2014.</p> <p>At the time of the audit, there was no nursery in place and interviews with management revealed that there are no plans to extend the current planted area.</p>	Complied
3.1.3	<p>The unit of certification holds management reviews at planned intervals appropriate to the scale and nature of the activities undertaken.</p> <p>- Minor compliance -</p>	<p>The unit of certification holds annual meetings to review implementation of planned activities. Interviews with the General manager and the Finance director revealed that these annual sessions are accompanied by a budgetary attribution to the respective activities in the business plan.</p> <p>Additionally, every Tuesday management review meetings are held to ensure continuous monitoring of the plan.</p>	Complied
<p><b>Criteria 3.2:</b> The unit of certification regularly monitors and reviews their economic, social and environmental performance and develops and implements action plans that allow demonstrable continuous improvement in key operations.</p>			
3.2.1	<p><b>(C)</b> The action plan for continuous improvement is implemented, based on consideration of the main social and environmental impacts and opportunities of the unit of certification.</p> <p>- Critical (Major) compliance -</p>	<p>Brabanta has a continuous improvement action plan that includes:</p> <ol style="list-style-type: none"> <li>1. Optimizing the yield of the supply base.</li> <li>2. Reduction in use of pesticides</li> <li>3. Environmental impacts</li> <li>4. Waste reduction</li> <li>5. Pollution and greenhouse gas (GHG) emissions</li> <li>6. Impacts on communities, workers, and smallholder.</li> <li>7. Integrated management of HCV-HCS, peatland and other conservation areas</li> </ol> <p>Evidence of implementation including reports, was seen during the audit.</p>	Complied

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3.2.2	<p>As part of the monitoring and continuous improvement process, annual reports are submitted to the RSPO Secretariat using the RSPO metrics template.</p> <p>- Minor compliance -</p>	<p>RSPO metrics template V2.1 was filled and reviewed. The Sustainability manager is the person in charge to fill the template. All the data recorded were confirmed by the audit team.</p>	Complied
<b>Criteria 3.3:</b> Operating procedures are appropriately documented, consistently implemented and monitored.			
3.3.1	<p><b>(C)</b> Standard Operating Procedures (SOPs) for the unit of certification are in place.</p> <p>- Critical (Major) compliance -</p>	<p>Brabanta has SOPs to cover its operations in the plantations and the Palm Oil Mill. These SOPs were made available for review during the audit. These SOPs were found to be appropriate and adequately covered the relevant processes and activities of the plantation and the mill. They are all dated and approved by management. These SOPs are written in the French language which is the official language. Current versions were found to be available at relevant sites visited during the audit.</p> <ul style="list-style-type: none"> <li>• Examples of the 17 Agriculture SOPs include "Procédure de prévision de la récolte of 23/08/2019 , indice 01, signed on 10/9/2019"</li> <li>• Example of the administrative SOPs include "Procédure d'achat of 22/02/2020 indice 00 signed on 22/4/2020"</li> <li>• Examples of the 18 RSPO specific SOPs include "Procédure de consentement libre, informe et préalable (CLIP) of 08/05/2019 indice 00 signed on 12/8/2019."</li> <li>• Example of the Mill procedures include "Consignes de conduite à la Fosse à condensat" of written date 30/8/2017, indice 01 version 01, Interview with workers and review of records confirmed that these procedures are generally understood by workers and are implemented.</li> </ul>	Complied
3.3.2	<p>A mechanism to check consistent implementation of procedures is in place.</p> <p>- Minor compliance -</p>	<p>Brabanta has mechanism in place to ensure the consistent implementation of its SOPs. This mechanism includes a diffusion of procedures, sensitization, training, monitoring and evaluation of implementation among other approaches. In terms of diffusion, procedures are sent to the relevant workers to read and sign as having</p>	Non-compliance

		<p>read. For example, item 2 Diffusion of the Procedures "de Gestion des Griefs Internes" of 16 May 2019 updated 7 /8/2021 Index 01. Sensitisation of the procedures are done by the head of the units concerned. Sample of these sensitization records were reviewed. Examples included: "Liste de Presence" for the training "traitment Coelaene" of 24/8/2021, List de Presence for the training ECL of 9/2/2021.</p> <p>The company also used the weekly Tool Box Talks specific to each department and daily briefings done by supervisors at each work site. For monitoring and evaluation of implementation of the procedures, an evaluation is done using the evaluation sheet for each procedures every 6 month and records are kept, sample of which were reviewed. For example "Fisch d'évaluaton Recolte" of Diviosn 1 sectilon C, equipe C5J of 19/02/2021 and Fisch d'évaluation BCL, of 17/08/2021. Trainings are also done, and records kept. For example, Fisch Suivi evaluation Formation for "procedure de communication et consultation eterne.</p> <p>Whenever there is non-conformance with the procedures, another training is given. Company has general procedures for handling non-conformities which applies to the results of monitoring and evaluation (procedures de traitment de non-conformites reeles ou potentielle of 18/06/2015.</p> <p>However, the company's mechanism for checking consistent implementation of its procedures was found not to be effective. The monitoring and evaluation of the effectiveness of implementation has not been carried out in all relevant units /operations of the company. For example, though there is an existing form of an action plan for non-conformities of SK Protection, the company indicates not to have carried out any monitoring and evaluation for this contracted party of its procedures to confirm that its procedures are effectively implemented. Field observations by the audit team in the presence of the managers sighted several instances of workers practices inconsistent with the</p>	
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		company's procedures. For example, in N11, FFB carriers' manner of carrying and the cutting of FFB stack by harvesters among other examples were all found not to be consistent with the company's procedures.	
3.3.3	Records of monitoring and any actions taken are maintained and available. - Minor compliance -	Brabanta maintains records of monitoring and actions taken for the implementation of its SOPs. These were made available and reviewed during the audit. Examples include: PPE records on action taken following internal monitoring on the use of PPEs: Eg, Sortie Equipment de protection individuel Tchniche Iusine of 26/06/2021, Sortie Equipment de protection Individuel (Botts) July 2021.	Complied
<p><b>Criteria 3.4:</b> A comprehensive Social and Environmental Impact Assessment (SEIA) is undertaken prior to new plantings or operations, and a social and environmental management and monitoring plan is implemented and regularly updated in ongoing operations.</p>			
3.4.1	<p><b>(C)</b> In new plantings or operations including mills, an independent SEIA, undertaken through a participatory methodology involving the affected stakeholders and including the impacts of any smallholder/outgrower scheme, is documented. - Critical (Major) compliance -</p>	<p>Brabanta has a new planting programme, but this was not in the scope of this certification audit because the company is waiting for the approval of the Remediation and Compensation Plan from RSPO. Nevertheless, the company has an independent SEIA carried by "OKAPI Environment Conseil sprl" which is approved by the "Ministère de l'Environnement, Conservation de la Nature et Tourisme (MECNT)" The final report "Étude d'impact environnemental et social des équipements additionnels (Usine, quai, extension plantation Forêt de Lumbunji et Malembe) of November 2011" was made available for review.</p> <p>This SEIA covered, the Factory, wharf, and plantation extension in Lumbunji and Malembe. This study integrated an earlier " environmental and social impact study (ESIA) of the BRABANTA-MAPANGU Project (PBM) carried out by Pierre Bois d "ENGHIEN in July 2010 which covered mainly on the existing plantation.</p> <p>The company is also carrying out new development on building and construction of new lagoon for the treatment of its POME. It has an independent environmental and social assessment for these developments. For example, "Project D'aménagement D'un Bassin, De</p>	Complied



		<p>Retention A Mapangu/Brabanta, Etude D’impact Environnemental Et Social”. By these, the company has SEIA covering the scope of its new developments.</p> <p>The ESIA studies included consultations with the affected stakeholders at different levels and stages of the study in a participatory manner with the objective of involving them in the final decision-making on the project. For example, details of the methods and the stakeholder consulted for the OKAPI ESIA is provided on pages section “X. Consultation du Public” 124-125. The company did not have smallholder or out grower programme.</p>	
<p>3.4.2</p>	<p>For the unit of certification, a SEIA is available and social and environmental management and monitoring plans have been developed with participation of affected stakeholders.</p> <p>- Minor compliance -</p>	<p>Brabanta has SEIA and social and environmental management plans for its existing plantation and the factory. The company has an independent SEIA carried by “OKAPI Environment Conseil sprl” The OKAPI study included an Environmental and Social Management Plan (ESMP) which detailed a practical and operational program for environmental and social monitoring and surveillance for implementation. Per the methodology of the study, the ESMP was developed as part of the overall study and included inputs of stakeholder at all stages of the study in a participatory manner with the objective of involving them in the final decision-making on the project. Details of the stakeholder consultation methods and the stakeholders consulted for the OKAPI ESIA is provided on pages section “X. Consultation du Public” 124-125. Consultation with the relevant stakeholders during the audit confirmed their participation in this process. The company also has an Environmental and Social Management plan for its existing plantation “Etude D’impact et Plan De Gestion Environnemental Et Social Approche Sociologique” by Alain Kanza Mopela Pendje, Sociologue et Anthropologue, 15 June to 15 July 2010.</p> <p>The company has brought these plans into its environmental management plan “ plan de gestion environnementale” of 15/01/2021 and the “Plan d’action Gestion Sociale of 5/07/2021 These plan outlines the</p>	<p>Complied</p>

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		identified impact areas and their corresponding mitigation actions and responsibilities. The social management plan for each action also identifies specific concerned communities. The company has been implementing the plans and provided evidence of implementation.	
3.4.3	<b>(C)</b> The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way.	Brabanta social and environmental management and monitoring plan is implemented, reviewed and updated with the participation of the affected stakeholders. Monitoring records are maintained and were available for review by the audit team. Consultation with the stakeholders also confirmed the implementation of the plan and reviews in which they have been part of the process.	Complied
<b>Criteria 3.5:</b> A system for managing human resources is in place.			
3.5.1	Employment procedures for recruitment, selection, hiring, promotion, retirement and termination are documented and made available to the workers and their representatives. - Minor compliance -	The company has a documented procedures for recruitment, selection, hiring, promotion, retirement and termination and was made available to the audit team for review. The document is dated 12/07/2019 and approved by the human resource manager and the Director general. The procedure has been made publicly available by displaying on the notice boards in the company. Copies are also made available on request and indicated by the Human Resource manager during interview.	Complied
3.5.2	Employment procedures are implemented and records are maintained. - Minor compliance -	The company maintain records of implementation of the procedures and were made available to the audit team for review. Evidence of recruitment of an assistant HR manager was seen and the process was consistent with the procedures. Some records made available for review include Letter of request for an assistant HR manager made by the HR manager to the company's administrative office in Kinshasa on the 07/06/2021. Base on the request the administrative office advertised the position and shortlisted applicants were interviewed on the 02/08/2021. The candidates that qualified were subjected to aptitude test on the 10/08/2021. Results of the interview was seen and reviewed. The successful candidate filled a personal form and undertakes a medical form. After he signs an agreed contract and is issued a registration	Complied

		number (009473). Review of the contract is consistent with the provisions in the procedure.	
<b>Criteria 3.6:</b> An Occupational health and safety (H&S) plan is documented, effectively communicated and implemented.			
3.6.1	<p><b>C)</b> All operations are risk assessed to identify H&amp;S issues. Mitigation plans and procedures are documented and implemented.</p> <p>- Critical (Major) compliance -</p>	<p>Brabanta has carried out risk assessment to identify health and safety issues which are documented with mitigation plans and procedures for implementation. However, this assessment did not cover all the relevant operations of the company. Consequently, mitigation plans have not been documented and implemented for all risks associated with its operations. The assessment done so far was made available for review during the audit. An example was the document "analyse de risqué Brabanta" which covers risk analysis for the administration, garage, agriculture, extraction, clinic among others. The company has HSE policy and HSE procedures for risk assessment (Procédure d'analyse des risques au travail of 16/11/2017, Revision 00). The company have had training in risk assessment and in the process of completing its risk assessment using the participatory approach. The company's risk assessment therefore is not yet completed and there are a number of risk areas expressed by workers which are currently not identified for mitigation actions. For example,</p> <ol style="list-style-type: none"> <li>1. Harvesters in all visited sites complained of lack of body protection without uniforms though section 4 (Equipements De Protection Individuelle) of the company's procedures – "Procédure d'accueil HSE of 28/06/2016 Revision 00) indicates to use uniform for body protection,</li> <li>2. The CPO storage tanks at the mill have no retention wall (though the company has plans and a budget to construct a retention wall).</li> </ol> <p>The incomplete risk assessment and the corresponding mitigation actions was therefore raised as a non-conformance.</p>	Non-compliance

3.6.2	<p><b>(C)</b> The effectiveness of the H&amp;S plan to address health and safety risks to people is monitored.</p> <p>- Critical (Major) compliance -</p>	<p>Brabanta has not monitored the effectiveness of its health and safety plan to address health and safety risks to people. The company has a Health and Safety plan with timelines which is distributed. A health and safety committee has been put in place who will be meeting every month to deal with health and safety plan implementation effectiveness. However, interview with managers and other workers confirmed that, these are all work in progress as the company's risk assessment is yet to be completed, the health and safety plan to be updated and the HSE committee is yet to start its work.</p>	Non-compliance
<p><b>Criteria 3.7:</b> All staff, workers, Scheme Smallholders, outgrowers, and contract workers are appropriately trained.</p>			
3.7.1	<p><b>(C)</b> A documented programme that provides training is in place, which is accessible to all staff, workers, Scheme Smallholders and outgrowers, taking into account gender-specific needs, and which covers applicable aspects of the RSPO P&amp;C, in a form they understand, and which includes assessments of training.</p> <p>- Critical (Major) compliance -</p>	<p>The company has a documented training program in place which was reviewed by the audit team. The program is titled Training Plan for Year 2021. Some of the topics for the training include</p> <ol style="list-style-type: none"> <li>1. ISO 14001 :2015</li> <li>2. RSPO Standards 2018</li> <li>3. First Aid</li> <li>4. Waste Management</li> <li>5. Storage of chemical products</li> <li>6. Management of chemical deposits</li> <li>7. Management of oil spillage</li> <li>8. Fire control</li> <li>9. Employee code of ethics</li> <li>10. Human rights</li> </ol> <p>The training covered their operational procedures as observed from review of the documents.</p>	Complied
3.7.2	<p>Records of training are maintained, where appropriate on an individual basis.</p>	<p>The company keeps records of all training provided in a file. Sampled training records were made available to the audit team for review. They</p>	Complied

	- Minor compliance -	include 1. Training on RSPO Certification System Date: 04/04/2021 Attendance: 41 2. Training on Waste Management Date: 21/02/2021 Attendance: 36	
3.7.3	Appropriate training is provided for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS). Training is specific and relevant to the task(s) performed. - Minor compliance -	The company has identified personnel critical to the implementation of the Supply Chain Certification Standard (SCCS). They are the mill manager, weighbridge clerk, RSPO Coordinator, Financial director, Assistant mill manager. However there are no evidence of training for the personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS).	Non-compliance
<b>Criteria 3.8:</b> Supply chain requirements for mills. <b>Procedure note:</b> all requirements are classified as <b>Critical Indicators</b> . 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.	N/A	Not Applicable

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<p>3.8.2</p>	<p>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.</p>	<p>Brabanta SA plans to implement the Mass balance supply chain module. The company receives FFB from their estates (under the scope of certification) and from independent third party suppliers who are harvesters of the wild fruits and are not covered by the certification</p>	<p>Complied</p>
<p>3.8.3</p>	<p>The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill shall be recorded by the certification body (CB) in the public summary of the P&amp;C certification report. This figure represents the total volume of certified oil palm product (CPO and PK) that the certified mill is allowed to deliver in a year. The actual tonnage produced shall then be recorded in each subsequent annual surveillance report.</p>	<p>The company gave the estimated tonnage as follows  CPO: 5,000 MT  PK: (No estimate provided as company has no use for the kernels now)</p>	<p>Complied</p>
<p>3.8.4</p>	<p>The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO IT platform.</p>	<p>The company at the time of the audit is not certified but has a Palmtrace account with number RSPO_PO1000011313 . Review of the account did not identify any entries made by the company as the company is yet to be certified.</p>	<p>Complied</p>
<p>3.8.5</p>	<p>Documented procedures  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> <ol style="list-style-type: none"> <li>a. Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements.</li> <li>b. Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records).</li> <li>c. Identification of the role of the person having overall responsibility</li> </ol>	<p>Brabanta SA documented procedures and records made available to the audit team are</p> <p>Procedures:</p> <ol style="list-style-type: none"> <li>1. Supply chain and traceability management procedure</li> <li>2. Procedure for the production of CPO</li> <li>3. Important instructions</li> </ol> <p>Records:</p>	<p>Non-compliance</p>

	<p>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.</p> <p>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>	<ul style="list-style-type: none"> <li>a. Weighbridge tickets</li> <li>b. Delivery slips</li> <li>c. Factory release certificate,</li> <li>d. Bulk CPO oil loading authorization</li> <li>e. Certificate of sample reception</li> <li>f. Training records</li> </ul> <p>Also Mr Urbain the RSPO coordinator has been identified as the person with overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. However, the company identified person with overall responsibility during the audit interview could not demonstrate awareness of the mill's procedures for the implementation of this standard.</p>	
<p>3.8.6</p>	<p><b>Internal Audit</b></p> <ul style="list-style-type: none"> <li>i. The mill shall have a written procedure to conduct annual internal audit to determine whether the mill; <ul style="list-style-type: none"> <li>a. Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.</li> <li>b. Effectively implements and maintains the standard requirements within its organisation.</li> </ul> </li> <li>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.</li> </ul>	<p>The company does not have a documented procedure for internal audit and has not conducted any internal audit as of the time of the audit</p>	<p>Non-compliance</p>
<p>3.8.7</p>	<p><b>Purchasing and Goods In</b></p> <ul style="list-style-type: none"> <li>i. The mill shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBS received.</li> </ul>	<p>The company sources its FFB for production from their estates which is under the scope of the audit and also buys FFB from loose fruit collectors in the communities. The FFB from company's estate that are received at</p>	<p>Non-compliance</p>

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	<ul style="list-style-type: none"> <li>ii. The mill shall inform the CB immediately if there is a projected overproduction of certified tonnage.</li> <li>iii. The mill shall have a mechanism in place for handling non-conforming FFB and/or documents.</li> </ul>	<p>the weighbridge comes with receipts. The receipt is titled "Details on the Transport of FFB". Some of the information recorded on the receipt include</p> <ul style="list-style-type: none"> <li>1. Source of the FFB,</li> <li>2. Date,</li> <li>3. Number and tonnage of the FFB</li> </ul> <p>However, loose fruits received from the communities that arrives at the weighbridge are not covered by any document.</p>	
<p>3.8.8</p>	<p>Sales and Goods Out</p> <p>The supplying mill shall ensure that the following minimum information for RSPO certified products is made available in document form. The 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"> <li>a. The name and address of the buyer;</li> <li>b. The name and address of the seller;</li> <li>c. The loading or shipment / delivery date;</li> <li>d. The date on which the documents were issued;</li> <li>e. RSPO certificate number;</li> <li>f. A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations);</li> <li>g. The quantity of the products delivered;</li> <li>h. Any related transport documentation;</li> <li>i. A unique identification number.</li> </ul>	<p>Brabanta is not certified and hence does not make sales of certified RSPO products. However, the company has a list of documents that accompany the sale of their CPO. They include: factory release certificate, Bulk CPO oil loading authorization, Delivery slip, Certificate of sample reception. Review of the documents showed the following information:</p> <ul style="list-style-type: none"> <li>1. Name of company</li> <li>2. Name of client</li> <li>3. Date</li> <li>4. Unique identification number</li> <li>5. Description of the product (CPO product)</li> <li>6. The leading or shipment/delivery date;</li> <li>7. The date on which the documents were issued</li> <li>8. The quantity of the products delivered;</li> </ul> <p>The information are spread on a number of documents that move along with the product.</p>	<p>Complied</p>



<p>3.8.9</p>	<p><b>Outsourcing Activities</b></p> <p>iii. The mill shall not outsource its milling activities. In cases where he mill outsources activities to independent third parties (e.g. subcontractors for storage, transport or other outsourced activities), the mill holding the certificate shall ensure that the independent third party complies with relevant requirements of this RSPO Supply Chain Certification</p> <p>iv. The mill shall ensure the following:</p> <ul style="list-style-type: none"> <li>d. The mill has legal ownership of all input material to be included in outsourced processes</li> <li>e. The mill has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The onus is on the mill to ensure that certification body (CB) has access to the outsourcing contractor or operation if an audit is deemed necessary.</li> <li>f. The mill has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor.</li> <li>g. The mill shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to their respective operations, systems, and all information, when this is announced in advance.</li> </ul>	<p>The company outsources the transportation of FFB from their estate to the mill. There are currently 6 FFB contract transporters and all have a contract with company.</p> <p>A Reviewed of sampled contracts for the transporters did not identify any of the requirements as stated in the indicator. Also there are no documented control system in place for the outsourced process.</p>	<p>Non-compliance</p>
<p>3.8.10</p>	<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 company has documented record with the details of all the contractors used in the transport of the company's FFB. Details of the information include Name of service provide, Contractor name, Address and contact number</p>	<p>Complied</p>
<p>3.8.11</p>	<p>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.</p>	<p>The company as of the time of the audit has not added to the list of outsourced contractors</p>	<p>Complied</p>

<p>3.8.12</p>	<p>Record keeping</p> <ul style="list-style-type: none"> <li>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.</li> <li>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.</li> <li>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.</li> <li>iv. For Mass Balance Module, the mill:             <ul style="list-style-type: none"> <li>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.</li> <li>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.</li> <li>c. The mill can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three (3) months. However, a mill is allowed to sell short (i.e. product can be sold before it is in stock.</li> </ul> </li> </ul>	<p>The company keeps records covering all aspects of this RSPO Supply Chain Certification Standard requirements</p> <p>Brabanta uses excel report to keep track of the production of FFB and CPO. The report details all FFB received according to their sources (estate and wild fruits), CPO production and Sales. The company balances its production and sales on daily basis and closes the sales every month.</p> <p>However, the company does not have a specific retention time for keeping their records</p>	<p>Non-compliance</p>
<p>3.8.13</p>	<p>Extraction Rate</p> <p>The oil extraction rate (OER) and the kernel extraction rate(KER) shall be applied to provide a reliable estimate of the amount of certified CPO and PK from the associated inputs. Mill shall determine and set their own extraction rates based upon past experience, documented and applied it consistently.</p>	<p>The company has identified their Oil Extraction rate to be as follows : FFB to CPO-23%</p> <p>There are no records on the extraction rates for the PK and these is because the company does not have capacity to process the Kernel.</p> <p>The yield figures are obtained based past experience. The company monitors the yield every month.</p>	<p>Complied</p>

3.8.14	Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate.	The extraction rate is updated on daily bases till the end of each month	Complied
3.8.15	Processing 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.	N/A	Not Applicable
3.8.16	Registration of Transactions 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. 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.	The mill is registered on the RSPO IT platform but have not made any entries at the time of the certification audit because they are not certified.	Complied
3.8.17	Claims 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.	The company does not make claims either on their website or on their sales documents as they are not certified.	Complied
<b>General corporate communications</b>			
4.1	A corporate communication is one made by any RSPO member that highlights its membership of the RSPO and/or its commitment to the principles of the RSPO. Corporate communication is an 'off-product' claim.	The company is not certified and does not make corporate communications	Not Applicable
4.2	In corporate communications a member is allowed to: a. Display its RSPO membership status	N/A	Not Applicable

	<p>b. Display the RSPO web address (www.rspo.org)</p> <p>c. State that the member supports the work of the RSPO</p> <p>d. State the member’s history with regard to the RSPO.</p> <p>e. Use the RSPO trademark to promote its membership of the RSPO.</p> <p>Additionally, where an RSPO member displays the RSPO trademark in digital format this must be accompanied by the text ‘Check our progress at www.rspo.org’ where the link must lead to the member’s profile page.</p>		
4.3	In corporate communications RSPO members must not make any statement that may lead consumers to believe that RSPO membership by itself implies the selling of RSPO-certified oil palm products.	N/A	Not Applicable
4.4	Members must ensure that all communication is consistent, clear and cannot mislead consumers or other stakeholders as to the certified content of oil palm products in the member’s own products.	N/A	Not Applicable
4.5	Members are not allowed to use the RSPO corporate logo as shown in the RSPO Rules on Market Communications & Claims document. This is for the sole use of the RSPO secretariat.	N/A	Not Applicable
<b>Business to business communications</b>			
5.1	Business to Business communication relates to RSPO members in the supply chain selling to and/or communicating with other organizations in the supply chain about the use of certified sustainable oil palm products.	The company does not make business to business communication with their clients or to any organisation	Not Applicable
5.2	When confirming the sale of certified oil palm products, members must adhere to the requirements of the RSPO SCCS. This includes stating the supply chain model and certificate number under which the claim is being made.	Brabanta does not make claims on their sales documents as the company is not certified to trade in certified products	Not Applicable
5.3	Where a distributor or wholesaler takes title to products containing certified sustainable oil palm products, the requirements of the RSPO SCCS can follow either of two options:	N/A	Not Applicable

	<p>a. If the distributor or wholesaler holds only a Distributor license, it may only communicate RSPO-certified oil palm products by linking the product to the manufacturer using the manufacturer’s SCCS certificate number. This covers both brand and own brand products. However, in the case of own brand products it is essential that customers are aware that the product has been made on behalf of the distributor or wholesaler, with specific evidence either through on-pack claims or documentation.</p> <p>b. If the distributor or wholesaler is supply chain-certified they should follow the requirements outlined in section 5.2.</p>		
5.4	<p>A certified member can provide information to its customers detailing the presence of certified palm oil contained within a product even if it is not eligible for a product-specific under RSPO rules. The end product must not be labelled as certified or sold in such a way that implies RSPO certification.</p> <p>For example, a retailer or food service company may require a breakdown of all palm based ingredients within an end product and the certified status of each. This information may be provided by a certified RSPO member without constituting a product-specific claim.</p>	N/A	Not Applicable
<b>Business to consumer communication</b>			
6.1	<p>Only RSPO members that have supply chain certification are allowed to make business to consumer claims about the certified sustainable oil palm products contained within product(s), which are known as ‘product-specific’ claims. Product-specific claims are voluntary.</p>	The company does not made claims on their sales documents when selling to their clients	Not Applicable
6.2	<p>Only RSPO members who have supply chain certification are authorised to use the RSPO trademark and/or RSPO label, with the exception of RSPO Credits and of retailers in accordance with 6.8 below.</p>	N/A	Not Applicable

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6.3	When on-pack claims on RSPO-certified sustainable oil palm products are used, the RSPO trademark and associated identification number must be present.	N/A	Not Applicable
6.4	Business to consumer communication shall not include information about the claimant's RSPO membership status.	N/A	Not Applicable
6.5	Members shall not communicate to consumers' information about their suppliers' RSPO membership status.	N/A	Not Applicable
6.6	Use of the RSPO trademark is restricted to claims about RSPO-certified sustainable palm oil products and it is not authorised for use in relation to any other ingredient.	N/A	Not Applicable
6.7	Use of any other trademark or logo to highlight the presence of RSPO-certified sustainable oil palm products is an unauthorised product-specific claim.	N/A	Not Applicable
6.8	RSPO members who are retailers or food service companies can apply for an RSPO trademark license for use in business to consumer communications, provided they can demonstrate the validity of these claims to an RSPO-accredited certification body (CB). This will be undertaken via a remote audit, prior to the trademark use, during which the retailer or food service company will need to demonstrate that the use of the trademark is in compliance with the rules contained within this document and that the claim itself can be supported through a certified supply chain. Any other palm oil claims, including those highlighting the absence of palm oil, must be highlighted to the CB during the audit to ensure that all claims comply with the requirements of these rules. The CB will confirm the outcome of these audits, to be conducted annually, to RSPO who may continue to grant a trademark license or withdraw permission based upon the audit findings. This is in keeping with the rules applying to RSPO supply chain certified members. The guidance document for audits is available on <a href="http://www.rspo.org">www.rspo.org</a> .	N/A	Not Applicable

<b>MODULE B – MASS BALANCE SPECIFIC RULES</b>			
<b>Minimum Mass Balance content</b>			
	95% or above of the oil palm content must be RSPO MB-certified.	There are no claims main yet. However, the quantity of MB material that could be sold will be depending on the quantity of MB certified FFB produced.	Not Applicable
	Where there is any percentage of non-certified oil palm within the product, the reason for this must be fully justified and an action plan for moving to fully certified oil palm must be in place, in accordance with the requirements of the RSPO SCCS. In addition, the non-certified volume must be covered by equivalent volume of RSPO Credits.	There are no claims main yet. However, the quantity of MB material that could be sold will be depending on the quantity of MB certified FFB produced.	Not Applicable
<b>Labelling and trademark (MB)</b>			
	<p>Members are allowed to use the RSPO label in one of the following ways:</p> <ul style="list-style-type: none"> <li>• Surrounded by the text: 'Certified sustainable palm oil'.</li> <li>• The RSPO label MUST contain the tag 'MIXED'. The tag MIXED designates oil palm products sourced under the Mass Balance (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.</li> <li>• The RSPO label can also include the statement: '[The palm oil contained in this product] contributes to the production of certified sustainable palm oil'.</li> <li>• Wherever the RSPO trademark is displayed, the applicable trademark license number must be shown immediately under or next to the trademark or the 'statement'. Font must be Calibri, font size must be at least 4 pt (1.4 mm or 0.06 inch).</li> </ul> <p>In on-pack communications, the RSPO trademark can be printed anywhere on the pack. Further guidance on use of the trademark is</p>	N/A. It is not expected any labelling or trademark will be use as the product that to be sold does not have packaging.	Not Applicable

	provided in the RSPO Trademark License Terms and Conditions and in Annex 1 of the Rules on Market Communications & Claims document.		
<b>Messaging (MB)</b>			
	<p>Messaging ALLOWED in storytelling in product-related communications includes:</p> <ul style="list-style-type: none"> <li>• [Oil palm products]/[palm oil]/[palm kernel oil] from RSPO-certified mills and plantations were mixed with non-certified oil palm products in the supply chain.</li> <li>• The volume of [oil palm products][palm oil]/[palm kernel oil] in this product reflects an equivalent volume of palm oil or palm kernel oil produced by RSPO certified mills and plantations.</li> <li>• In off-product communications, reference to (or images of) particular RSPO-certified production units, if the relationship to those units can be shown in company records is allowed.</li> </ul> <p>Messaging NOT ALLOWED in storytelling in product-related communications:</p> <p>Anything that can lead consumers to believe that RSPO-certified palm products are (certified to be) part of the product.</p>	N/A. It is not expected any labelling or trademark will be use as the product that to be sold does not have packaging.	Not Applicable
<b>Principle 4: Respect community and human rights and deliver benefit</b>			
Respect community rights, provide equal opportunities, maximise benefits from engagement and ensure remediation where needed.			
<b>Criteria 4.1:</b> The unit of certification respects human rights, which includes respecting the rights of Human Rights Defenders.			
4.1.1	<p><b>(C)</b> A policy to respect human rights, including prohibiting retaliation against Human Rights Defenders (HRD), is documented and communicated to all levels of the workforce, operations, supply chain and local communities and prohibits intimidation and harassment by the unit of certification and contracted services, including contracted security forces.</p> <p>- Critical (Major) compliance -</p>	<p>The company has a documented human rights policy dated 11/04/2019 and approved by the General Manager. The policy states that the company does not make distinctions with regard to race, colour, sex, religion and political opinion in all its activities.</p> <p>The company also has a documented policy for the protection of the Human Rights Defenders signed by the General Manager. The aim of this policy statement is to define how Brabanta creates an environment</p>	Complied



		<p>of mutual respect and how it is committed to developing an organizational culture that implements a policy of supporting human rights and seeks to avoid with passion any form of violation of human rights, as listed in the universal declaration of human rights.</p> <p>The policy applies to everyone present on the premises of the company at all times, including, but not limited to all staff and their families and friends, contractors, third parties, visitors and suppliers of the company. The policy has been posted on the notice boards in and around the company and also communicated to the workers during their daily muster as confirmed by workers interviewed.</p> <p>Interview with the communities also indicated that the policy has been shared and communicated to them through the Community Relations Officer who leaves copies at the chief's palace. Interviews with workers and communities and other stakeholders from the government agencies did not establish abuse of human rights by the company</p>	
4.1.2	<p>The unit of certification does not instigate violence or use any form of harassment, including the use of mercenaries and paramilitaries in their operations.</p> <p>- Minor compliance -</p>	<p>Interview with both communities and workers' representatives indicates the company does not use mercenaries or paramilitaries to instigate violence or harass workers or the communities.</p>	Complied
<p><b>Criteria 4.2:</b> There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all affected parties.</p>			
4.2.1	<p><b>(C)</b> The mutually agreed system, open to all affected parties, resolves disputes in an effective, timely and appropriate manner, ensuring anonymity of complainants, HRD, community spokespersons and whistleblowers, where requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRD.</p> <p>- Critical (Major) compliance -</p>	<p>The company has a documented grievance procedure last updated on the 10/07/2021. The document is signed by the Director General. Also the company has a grievance procedure for internal implementation last updated on the 08/2021 and signed by the Director General. The procedure as reviewed ensures the anonymity of whistle blowers where requested (Clause 3.3), resolves dispute in a timely manner (clause 3.6) and outlines steps to follow to report a grievance.</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>The procedure is shared with the various parties including workers and community's representatives. Workers have been sensitized on the</p>	Complied

	- Minor compliance -	procedures at their daily morning musters to ensure everyone understands the procedures involved to report a grievance. Interview with sampled workers in Sanga Sanga estate (A6, C7), Kadima estate (D9) and Kanaiga estate all demonstrated knowledge in the procedures and confirmed been sensitized on the procedure at the muster.	
4.2.3	The unit of certification keeps parties to a grievance informed of its progress, including against agreed timeframe and the outcome is available and communicated to relevant stakeholders. - Minor compliance -	Review of the procedures indicates the company organizes meetings with the complainant and all affected stakeholders to talk about the progress and outcome of the investigation. During interview with sampled workers in Sanga Sanga estate (A6, C7), Kadima estate (D9) and Kanaiga estate all indicated that most of the issues are resolved among themselves without having to go through the formal channel. However, for the few cases the process was consistent with the procedure as is been communicated to them during their morning musters.  Although the company does not received many complains, there are records of all cases reported. The report as reviewed has the date in which the report was made, records of the complainant and respondent and the stage of grievance. All the complaint as reviewed during the audit period has reached their conclusive ends with none pending	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 -	Review of the procedures confirms compliance	Complied
<b>Criteria 4.3:</b> The unit of certification contributes to local sustainable development as agreed by local communities.			
4.3.1	Contributions to community development that are based on the results of consultation with local communities are demonstrated. - Minor compliance -	The company meets every three months with the communities to discuss social issues and community needs as well as improve the relations. Copy of the report on the meeting was made available to the audit for review.	Complied

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		<p>Communities Grievance resulting from the popular consultation meetings. Date 21/10/2020.</p> <p>Issues discussed include</p> <ul style="list-style-type: none"> <li>a. Inform population of employment vacancies</li> <li>b. Donations to immigrant communities</li> <li>c. Motivations for chiefs of immigrant communities</li> <li>d. Construction of schools.</li> </ul> <p>Also the company has documented a Social Management Plan dated 5/07/2021 and approved by the General Manager. The plan was developed in consultations with the communities to identify their need after the Social Impact Assessment was conducted. A review of the plan shows the company has identified social development needs to undertake in consultations with the communities. Some of the developments include School, roads, employments, markets, access to water and others. There are timelines for each planned project. For instances review of the document shows the timeline allocated for the establishment of classrooms in Kayaya, Ngoyi and Tshiamundenda is from 2019 to 2024. Interview with community leaders established that construction of the classrooms has begun in the three communities</p>	
<p><b>Criteria 4.4:</b> Use of the land for oil palm does not diminish the legal, customary or user rights of other users without their free, prior and informed consent.</p>			
<p>4.4.1</p>	<p><b>(C)</b> Documents showing legal ownership or lease, or authorised use of customary land authorised by customary landowners through a Free, Prior and Informed Consent (FPIC) process. Documents related to the history of land tenure and the actual legal or customary use of the land are available.</p> <p>- Critical (Major) compliance -</p>	<p>The company has documents showing legal rights to the use of land for Brabanta operations. Copies of the land title documents were made available to the audit team for review. The land was leased in 2015 for a period of twenty-five years. Also copies of payment of land tax made to the Ministries of Finance, Kasai-Occidental province were seen and reviewed by the audit team. Payment with reference number 010INFT210760310 for PMT AP 183/2021 DGRAD made on the 17<sup>th</sup> March 2021 for an amount of 10,743,051.50 CDF.</p>	<p>Complied</p>

		Also during the stakeholder consultations with community (chiefs, women representatives and youth leaders) from Ndjembe, Mumbende, Kayaya, Ngoyi, Malongo and Kalembe, they confirmed there are no dispute on any of the land used by the company and none of them contributed land to Brabanta's operations.	
4.4.2	<p>Copies of documents evidencing agreement-making processes and negotiated agreements detailing the FPIC process are available and include:</p> <p>- Minor compliance -</p> <p>4.4.2a Evidence that a plan has been developed through consultation and discussion in good faith with all affected groups in the communities, with particular assurance that vulnerable, minorities' and gender groups are consulted, and that information has been provided to all affected groups, including information on the steps that are taken to involve them in decision making</p>	<p>Agreements leading to the transfer of land rights was made between the Government and Brabanta with no communities contributing land to the operations.</p> <p>There are other lands that were acquired directly from the communities after successful negotiations with Socfin SA. However, those areas are not included in the scope of this certification.</p>	Not Applicable
	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	Same as above	
	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.	Same as above	
4.4.3	<p><b>(C)</b> Maps of an appropriate scale showing the extent of recognised legal, customary or user rights are developed through participatory mapping involving affected parties (including neighbouring communities where applicable, and relevant authorities).</p> <p>- Critical (Major) compliance -</p>	The company has maps showing all land under their concessions. Although none of the communities contributed land to the operational areas under the scope of this audit, the company engages and ensures community participation in all land related issues	Complied

4.4.4	<p>All relevant information is available in appropriate forms and languages, including assessments of impacts, proposed benefit sharing, and legal arrangements.</p> <p>- Minor compliance -</p>	<p>Although the company did not acquire land from the communities, Brabanta shares all relevant information including policies, procedures and assessment reports with the communities. This was confirmed by the communities (Ndjembe, Mumbende, Kayaya, Ngoyi, Malongo and Kalembe) during stakeholder engagements with the audit team.</p>	Complied
4.4.5	<p><b>(C)</b> Evidence is available to show that communities are represented through institutions or representatives of their own choosing, including by legal counsel if they so choose.</p> <p>- Critical (Major) compliance -</p>	<p>Communities indicated during the stakeholder engagements that they are represented by their traditional leaders or representatives of selected group (women and youth group leaders). They also indicated that when there is the need to change a representative of the community, letters are sent to the Head of Sector of Mapangu who will officially write to the company. However, there has not been any of such incidents</p>	Complied
4.4.6	<p>There is evidence that implementation of agreements negotiated through FPIC is annually reviewed in consultation with affected parties.</p> <p>- Minor compliance -</p>	N/A. As indicated in 4.4.2	Not Applicable
<p><b>Criteria 4.5:</b> No new plantings are established on local peoples' land where it can be demonstrated that there are legal, customary or user rights, without their FPIC. This is dealt with through a documented system that enables these and other stakeholders to express their views through their own representative institutions.</p>			
4.5.1	<p><b>(C)</b> Documents showing identification and assessment of demonstrable legal, customary and user rights are available.</p> <p>- Critical (Major) compliance -</p>	<p>Prior Socfin SA took over the land, Brabanta was <b>an existing oil palm plantation</b> and no new plantings has been carried out within the scope of this certification audit. Also all land with the scope of this audit for Brabanta operations were acquired through negotiated agreement with the government of Congo DR. None of the communities contributed land to the operations under the scope of this audit.</p> <p>In the context of those estates within the scope of certification, user rights does not exist as there were no communities farming on the land before or prior to its acquisition. It was all palms that was transferred to Socfin SA.</p>	Not Applicable

4.5.2	<p><b>(C)</b> FPIC is obtained for all oil palm development through a comprehensive process, including in particular, full respect for their legal and customary rights to the territories, lands and resources via local communities' own representative institutions, with all the relevant information and documents made available, with option of resourced access to independent advice through a documented, long-term and two-way process of consultation and negotiation.</p> <p>- Critical (Major) compliance -</p>	As indicated in 4.5.1 above	Not Applicable
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. Negotiated agreements are non-coercive and entered into voluntarily and carried out prior to new operations.</p> <p>- Minor compliance -</p>	As indicated in 4.5.1 above	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>	As indicated in 4.5.1 above	Not Applicable
4.5.5	<p>Evidence is available that the affected communities and rights holders have had the option to access to information and advice that is independent of the project proponent, concerning the legal, economic, environmental and social implications of the proposed operations on their lands.</p> <p>- Minor compliance -</p>	As indicated in 4.5.1 above	Not Applicable

4.5.6	Evidence is available that the communities (or their representatives) gave consent to the initial planning phases of the operations prior to the issuance of a new concession or land title to the operator. - Minor compliance -	As indicated in 4.5.1 above	Not Applicable
4.5.7	New lands will not be acquired for plantations and mills after 15 November 2018 as a result of recent (2005 or later) expropriations in the national interest without consent (eminent domain), except in cases of smallholders benefitting from agrarian reform or anti-drug programmes. - Minor compliance -	As indicated in 4.5.1 above	Not Applicable
4.5.8	<b>(C)</b> New lands are not acquired in areas inhabited by communities in voluntary isolation. - Critical (Major) compliance -	As indicated in 4.5.1 above	Not Applicable
<b>Criteria 4.6:</b> Any negotiations concerning compensation for loss of legal, customary or user rights are dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.			
4.6.1	<b>(C)</b> A mutually agreed procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, is in place. - Critical (Major) compliance -	N/A, Same as 4.5.1 above	Not Applicable
4.6.2	<b>(C)</b> A mutually agreed procedure for calculating and distributing fair and gender-equal compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation. - Critical (Major) compliance -	Same as 4.5.1 above	Not Applicable
4.6.3	Evidence is available that equal opportunities are provided to both men and women to hold land titles for small holdings. - Minor compliance -	Same as 4.5.1 above	Not Applicable

4.6.4	The process and outcomes of any negotiated agreements, compensation and payments are documented, with evidence of the participation of affected parties, and made publicly available to them. - Minor compliance -	Same as 4.5.1 above	Not Applicable
<b>Criteria 4.7:</b> Where it can be demonstrated that local peoples have legal, customary or user rights, they are compensated for any agreed land acquisitions and relinquishment of rights, subject to their FPIC and negotiated agreements.			
4.7.1	<b>(C)</b> A mutually agreed procedure for identifying people entitled to compensation is in place. - Critical (Major) compliance -	Same as 4.5.1 above	Not Applicable
4.7.2	<b>(C)</b> A mutually agreed procedure for calculating and distributing fair compensation (monetary or otherwise) is in place and documented and made available to affected parties. - Critical (Major) compliance -	Same as 4.5.1 above	Not Applicable
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 -	Same as 4.5.1 above	Not Applicable
<b>Criteria 4.8:</b> The right to use the land is demonstrated and is not legitimately contested by local people who can demonstrated that they have legal customary, or user rights.			
4.8.1	Where there are or have been disputes, proof of legal acquisition of title and evidence that mutually agreed compensation has been made to all people who held legal, customary, or user rights at the time of acquisition is available and provided to parties to a dispute, and that any compensation was accepted following a documented process of FPIC. - Minor compliance -	Brabanta has land titled documents showing their rights to the use of the land and also there are no dispute on the land as confirmed by the communities (Ndjembe, Mumbende, Kayaya, Ngoyi, Malongo and Kalembe) during the community engagements.	Not Applicable
4.8.2	<b>(C)</b> Land conflict is not present in the area of the unit of certification. Where land conflict exists, acceptable conflict resolution processes (see Criteria 4.2 and 4.6) are implemented and accepted by the parties	Same as in 4.8.1	Not Applicable



	involved. In the case of newly acquired plantations, the unit of certification addresses any unresolved conflict through appropriate conflict resolution mechanisms. - Critical (Major) compliance -		
4.8.3	Where there is evidence of acquisition through dispossession or forced abandonment of customary and user rights prior to the current operations and there remain parties with demonstrable customary and land use right, there claims will be settled using the relevant requirements (Indicator 4.4.2, 4.4.3 and 4.4.4). - Minor compliance -	Same as in 4.8.1	Not Applicable
4.8.4	For any conflict or dispute over the land, the extent of the disputed area is mapped out in participatory way with involvement of affected parties (including neighbouring communities where applicable). - Minor compliance -	Same as in 4.8.1	Not Applicable
<p><b>Principle 5: Support smallholder inclusion</b>          Include smallholders in RSPO supply chains and improve their livelihoods through fair and transparent partnerships.</p>			
<p><b>Criteria 5.1:</b> The unit of certification deals fairly and transparently with all smallholders (Independent and Scheme) and other local businesses.</p>			
5.1.1	Current and previous period prices paid for FFB are publicly available and accessible by smallholders. - Minor compliance -	Brabanta did not make current and previous prices paid to FFB Collectors publicly available and accessible. The company does not have FFB suppliers (smallholder farmers) but source from FFB Collectors. The company provided a document "Achat Noix Villageouses of 17 August 2020" from its office which contained the current price as evidence for this requirement. Though FFB Collectors interviewed were aware of the previous and the current prices paid to them, the evidence provided by the company from its office did not meet this requirement for making the current and previous prices paid to FFB Collectors publicly available and accessible. A non-conformity was therefore raised.	Non-compliance

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5.1.2	<p><b>(C)</b> Evidence is available that the unit of certification regularly explains the FFB pricing to smallholders.          - Critical (Major) compliance -</p>	<p>Brabanta did not provide evidence of having regularly explained its pricing to its FFB Collectors. The company did not have smallholders as FFB suppliers but FFB Collectors who collect fruits from the wild and sell to the company. Interview with the company confirmed that it has not explained the pricing of loose fruits to collectors as required by this RSPO standard. A non-conformity was therefore raised.</p>	Non-compliance
5.1.3	<p><b>(C)</b> Fair pricing, including premium pricing, when applicable, is agreed with smallholders in the supply base and documented.          - Critical (Major) compliance -</p>	<p>Brabanta has documented pricing agreed with its FFB Collectors. As mentioned in other sections in this report, the company does not have smallholder farmers as FFB suppliers but FFB Collectors. Interview with management of the company revealed that, the price for the loose fruits is determined from the market taking a number of variables into consideration with the starting point being the price of CPO which is set by the Government. Other considerations are the type of the fruit (Dura, Pisifera or the Tenera), the extraction rate, transport (whenever applicable depending on whether it is bought directly from the communities or 3rd party suppliers). No premium was being paid at the time of the audit. The company provided evidence of a "purchase agreement" (Achat Noix Villageouses of 17 August 2020) with FFB Collectors signed by the General Manager and had signatures of "representatives of the communities" which according to the company are the chiefs and the people who could read and write. Interview with the representatives of FFB Collectors invited by the company to meet with the audit team confirmed to be aware of the price of the loose palm fruits they sell to the company and the representatives who signed the document though they were not aware of the document.</p>	Complied
5.1.4	<p><b>(C)</b> Evidence is available that all parties, including women and independent representative organisations assisting smallholders where requested, are involved in decision-making processes and understand the contracts. These include those involving finance, loans/credits, and</p>	<p>As mentioned in other sections in this report, the company does not have smallholders as FFB suppliers but FFB Collectors. Brabanta provided evidence to demonstrate that parties, including women and its FFB Collectors when requested are involved in decision and understand the contract. For example, the company provided evidence of the signed</p>	Complied

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	<p>repayments through FFB price reductions for replanting and or other support mechanisms where applicable.</p> <p>- Critical (Major) compliance -</p>	<p>purchase agreement” (Achat Noix Villageouses of 17 August 2020) with the representatives of the FFB Collectors.</p> <p>Review of loose palm fruits purchase records and payment records confirm no deduction for replanting and other support given to by the company. A meeting with the representatives of the FFB Collector during the audit also confirmed that, they have not been deducted towards the company’s replanting or support given by the company to their communities.</p>	
5.1.5	<p>Contracts are fair, legal and transparent and have an agreed timeframe.</p> <p>- Minor compliance -</p>	<p>Brabanta did not demonstrate to have contract with FFB Collectors which is legally enforceable with agreed time frame. The company provided evidence of a “purchase agreement” (Achat Noix Villageouses of 17 August 2020) with FFB Collectors signed by the General Manager. However, it could not justify what makes the Achat Noix Villageouses a legal document. Apart from the company’s General Managers signature, the document has signatures of “representatives of the communities” who according to the company is evidence that the signees have “seen the document”. The company buy loose palm fruits from both agents and individuals in the communities through their representatives. The document also had no time frame. Representatives of the FFB Collectors invited by the company to meet with the audit team said they have no idea of the existence of the document. A non-conformity was therefore raised.</p>	Non-compliance
5.1.6	<p><b>(C)</b> Agreed payments are made in a timely manner and receipts specifying price, weight, deductions and amount paid are given.</p> <p>- Critical (Major) compliance -</p>	<p>Brabanta made agreed payments in a timely manner to its FFB Collector. Fruits collected are received by the company representatives at the collection sites in pre-calibrated 25 kg boxes and records for the collectors and quantity of fruits are taken. Collected fruits are delivered and weighed at the company’s weighbridge to cross-check with the recorded quantity. Payment is made in cash to the representatives of FFB Colectors who in turn make payments to individual collectors. The company maintains a sheet on which individual FFB Colectors within</p>	Complied

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		specific collection community or site signs as receipt for the amount of money for their sale at any particular week. The sheet titled "operation d'achat des noix villageoises pour Brabanta" indicates the site of fruit collection, the date, the name of the cutter/collector, quantity (number of boxes), unit price, the total amount and the signature of the collector. Records of such payment were made available for review. Examples included payment for Week of 4/3/2021 for Mapangu collection site for a total of 796,000 Fe for 24 collectors and that of Imbilibi site for the week of 15/3/2021 for 13 FFB Collectors. A meeting with the representatives of the FFB Collectors during the audit confirm that, payment is made 3 to 4 days after sales. Per the current payment procedures, FFB Collectors do not have any records or evidence of sale of loose fruits to the company.	
5.1.7	Weighing equipment is verified by an independent third party on a regular basis (this can be government). - Minor compliance -	Brabanta weighing equipment for measurement of quantity of loose palm fruits purchased from FFB Collectors are independently calibrated. The equipment are the company's weighbridge and a standing scale used to calibrate the 25kg boxes used to measure loose palm fruits from collectors. The audit team verified the calibration of the standing scale which had been calibrated by Wildra with expiry date of December 2021.	Complied
5.1.8	The unit of certification supports Independent Smallholders with certification, where applicable, ensuring mutual agreements between the unit of certification and the smallholders on who runs the internal control system (ICS), who holds the certificates, and who holds and sells the certified material. - Minor compliance -	Brabanta did not have Independent Smallholders at the time of the audit.	Complied
5.1.9	<b>(C)</b> The unit of certification has a grievance mechanism for smallholders and all grievances raised are dealt with in a timely manner. - Critical (Major) compliance -	Brabanta did not have smallholders at the time of the audit. The company however has FFB Collectors who collect palm fruits from the wild and supply to its mill. The company has grievance mechanism procedures (Procedure de gestion des griefs externs index 02 of 16 September 2015) in place which is applicable to its FFB Collectors. The	Complied

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		company provided evidence of sensitizing its stakeholders of these procedures for review by the audit team. For example, the records on sensitization on "Procedure de gestion des griefs externes" of 17/11/2020 for Kadima Port, Kayaya, Nqog I, that of Mbongo, Natafadi, Tohianurumudinda of 24/11/2020 among others all with signed attendance list. Meeting with FFB Collectors confirm knowledge of this training while others indicated not to be aware.	
<b>Criteria 5.2:</b> The unit of certification supports improved livelihoods of smallholders and their inclusion in sustainable palm oil value chains.			
5.2.1	The unit of certification consults with interested smallholders (irrespective of type) including women or other partners in their supply base to assess their needs for support to improve their livelihoods and their interest in RSPO certification. - Minor compliance -	Brabanta did not have smallholders, but FFB Collectors as mentioned in different sections of this report. Loose fruit collection is done at community level and the company deals with collectors as a community. The company consulted with the communities within which loose palm fruits are collected and provided evidence for review during the audit. The review confirmed that consultation with the communities included issues and concerns of FFB Collectors. For example consultation on community development "Consultation Communautaire theme "interview sur le plan de developement Communautaire of 27/05/2020. The company has the list of LFCs who has sold fruits to it as sale record but there is no reference of master list of its LFCs. The company's stakeholder list also did not identify and include LFCs so as to assess their specific needs and give support. The audit team raised an OFI on the lack of a reference or master list of its LFCs.	OFI
5.2.2	The unit of certification develops and implements livelihood improvement programmes, including at least capacity building to enhance productivity, quality, organisational and managerial competencies, and specific elements of RSPO certification (including the RSPO Standard for Independent Smallholder). - Minor compliance -	Brabanta has developed and implementing livelihood programme for its LFCs. A meeting with the sample of LFCs during the audit confirmed that the company has given them training on loose palm fruits picking to include the quality of fruits, sensitisation on policies and procedures among others. According to the company, support for LFC is within the general support for the communities and provided evidence to this effect. For example, "Consultation Communautaire theme "interview sur le plan de developement Communautaire of 27/05/2020 and the training	Complied

		on bee keeping for example training on "Project D'encadrement Apicole" and "repport d'activite de mois de Juliet 2021 on 09-to 10 July 2021 "Recolte de miel", Entretien du rucher, Capture, Mise en place de colonie for Kayaya, Mwabu, Savane, Mapangu and others.	
5.2.3	Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production. - Minor compliance -	Brabanta LFCs collect palm fruits from the wild and are not involved in Palm plantation development. These wild oil palm are found on community lands and managed by the communities through their chiefs and leaders.	Not Applicable
5.2.4	<b>(C)</b> Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling. - Critical (Major) compliance -	Brabanta did not have Scheme Smallholders at the time of the audit. The company's LFCs do not use or handle pesticides as part of their palm fruits collection activities.	Not Applicable
5.2.5	The unit of certification regularly reviews and publicly reports on the progress of the smallholder support programme. - Minor compliance -	Brabanta have Loose Fruit Collectors who are supported as part of its community development. The company regularly reviews and publicly reports on the progress of these support programmes. For example, the "plan de developpement Communautaire" signed October 2019. This is plan has been reviewed for example "plan d'action gestion sociale" of 05/07/2021	Complied
<p><b>Principle 6: Respect workers' rights and conditions</b>  Protect workers' rights and ensure safe and decent working conditions.</p>			
<p><b>Criteria 6.1:</b> Any form of discrimination is prohibited.</p>			
6.1.1	<b>(C)</b> A publicly available non-discrimination and equal opportunity policy is implemented in such a way to prevent discrimination based on ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or age. - Critical (Major) compliance -	The company has an Anti- Discrimination policy dated 09/09/2020 and signed by the Director General. The policy indicates that the company respects the laws of the country which prohibits all forms discrimination in the workplace based on ethnic or racial origin, sex, handicap, place of origin, marital status, etc. The company ensures all have equal opportunities regarding recruitment, working conditions, promotion, remuneration, access to vocational training, retirement pension and dismissal.	Complied

		The policy was observed to be displayed on all the notice boards in and around the company. Copies were also shared with the communities through their local chiefs.	
6.1.2	<p><b>(C)</b> Evidence is provided that workers and groups including local communities, women, and migrant workers have not been discriminated against. Evidence includes migrant workers' non-payment of recruitment fees.</p> <p>- Critical (Major) compliance -</p>	Interview with workers in Block A6 and C7 of the Sagna and Sagna estate, D9 in Kadima estate and with the workers' representatives and communities indicates workers including local communities and women have not been discriminated against. The company also has an Anti-Discrimination policy which has been made publicly available and sensitize with the communities and workers.	Complied
6.1.3	<p>The unit of certification demonstrates that recruitment selection, hiring, access to training and promotion are based on skills, capabilities, qualities and medical fitness necessary for the jobs available.</p> <p>- Minor compliance -</p>	<p>The company has a documented procedure for the recruitment of workers which was made available to the audit team for review. The document is dated 09/07/2019 and approved by the General Director. The recruitment process starts with the identification of a vacant position which is reported and validated by the GM.</p> <p>For unskilled labour, announcement is made at the muster in the morning. For skill labour the advert is post on the notice boards in the villages and communities</p> <p>When a contract is made it is signed by both the Director General and the employee. The signed contract is then sent to the National Office for Employment (ONEM), a government agency for approval to ensure compliance with the labour law.</p> <p>The appointment/contract document of an employee with code 009473 was seen and reviewed. It was observed that his appointment went through the various processes as documented in the recruitment procedure.</p>	Complied
6.1.4	<p>Pregnancy testing is not conducted as a discriminatory measure and is only permissible when it is legally mandated. Alternative equivalent employment is offered for pregnant women.</p> <p>- Minor compliance -</p>	The company by the law does not carry out pregnancy test on the female worker either before or after recruitment as stated by the Personnel manager. Also interview with the medical officer at the Sagna Sagna estate indicated that pregnancy test is carried out only upon request by	Complied

		<p>the female workers. Interview with the female workers in Kanaiga and Sagna Sagna estate confirmed the company does not conduct pregnancy test on them.</p>	
<p>6.1.5</p>	<p><b>(C)</b> A gender committee is in place specifically to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women.          - Critical (Major) compliance -</p>	<p>The company has a gender committee in place formed in 11<sup>th</sup> September 2019 with the aim of ensuring no sexual harassment at the work place, pregnant women do not handle chemical activities, breastfeeding women have enough time to breast feed the children identification of new mothers needs and ensure there are no discrimination against women for promotion. The gender committee has a list of members made up of 4 men and 8 women. The committee meets once every three months. Copies of the minutes of meetings were made available to the audit for review.</p> <ol style="list-style-type: none"> <li>1. Minutes of meeting of Gender committee,              Date: 2<sup>nd</sup> October 2020,              Agenda: Sensitization on women reproductive right.</li> <li>2. Minutes of meeting of Gender committee,              Date: 4<sup>th</sup> December 2021,              Agenda: Discrimination at work place</li> </ol> <p>Some of the activities undertaken by the committee include</p> <ol style="list-style-type: none"> <li>a. Sensitization of women on the reproductive rights</li> <li>b. Establishment of a gender committee representatives in different area</li> </ol> <p>Review of the minutes of meetings for the gender committee did not include attendance list. Also, activities report reviewed has no venue and no attendance to show the people who attended the program apart from the members of the gender committee.</p>	<p>Non-compliance</p>



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6.1.6	<p>There is evidence of equal pay for the same work scope.</p> <p>- Minor compliance -</p>	<p>The company has a salary grade for all category of workers which is captured in the worker’s conditions of service. The document is made available to the workers through their representatives. The salary grade for all new employees are also included in their contract documents. Review of contract for employee with code 009473 shows the job description, salary grade and salary are captured in the contract document. This is further explained to the worker prior to engagement.</p>	Complied
<p><b>Criteria 6.2:</b> Pay and conditions for staff and workers and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages (DLW).</p>			
6.2.1	<p><b>(C)</b> Applicable labour laws, union and/or other collective agreements and documentation of pay and conditions are available to the workers in national languages and explained to them in language they understand.</p> <p>- Critical (Major) compliance -</p>	<p>The company has a documented collective agreement which was the result of an agreement between representative of the workers and Management of Brabanta Palm Oil Mill. The Collective agreement is dated May 2018 and signed by the representatives from both the company and workers. The agreement details the grading, salary structure, working hours, overtime and other conditions of service.</p> <p>The employee arrangement in the company are Management and Unionized workers (fixed rated and permanent workers). Copies of the conditions of service are displayed on all company notice boards and is explained to all the workers during their morning muster. The content of the Condition of Service which is written in French, has been explain to the understanding of all the workers in the local language.</p> <p>In addition, workers are issued with pay slip which contains detailed information on payment and deduction. Information on the payslip include Base salary, holidays, taxes paid, net salary. Interview with the worker shows they have an understanding of the information on the payslip.</p>	Complied
6.2.2	<p><b>(C)</b> Employment contracts and related documents detailing payments and conditions of employment (e.g. regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for</p>	<p>Review of sampled employment contracts shows details of the conditions of employment are clearly outlined. Some of the conditions include hours of work, basic Salary, Worker’s grade, contract duration,</p>	Complied

	<p>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>overtime, and many more.</p> <p>The contracts documents are written in French which is the official written and spoken language. Interview with the workers in A6, C7 in Sanga Sagna estate, D9 in Kadima estate indicated the content of their contracts were explain to their understanding before thumb printing or signing.</p> <p>Sampled contract for permanent workers with code 403 and fixed rated contract with code 9260 were reviewed and all had the details on the conditions of employment stated in the contract.</p> <p>Interview with the workers confirm all information provided on the payslips are accurate and the pay they receive are consistent with the terms of the contract</p>	
<p>6.2.3</p>	<p><b>(C)</b> There is evidence of legal compliance for regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice and other legal labour requirements.</p> <p>- Critical (Major) compliance -</p>	<p>Review of the contract document and conditions of service for the unionized workers indicated the normal hours of work for all employees shall be 40 hours a week. Interview with the workers and the four worker’s union also indicated that any work done at the request of the employer after completing the standard daily eight hours of work in a weekday is treated as overtime. Regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal have all been captured in the workers’ conditions of service and are in compliance with the Congo Labour Act. Review of appointment letters and workers conditions of service were found to be in compliance with the Labour law</p>	<p>Complied</p>
<p>6.2.4</p>	<p><b>(C)</b> The unit of certification provides adequate housing, sanitation facilities, water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. National laws, or in their absence the ILO Guidance on Workers’ Housing Recommendation No. 115, are used. In the case of acquisitions of non-certified units, a plan is developed detailing the</p>	<p>The company has a housing policy which defines the criteria for the allocation and management of housing made available to their employees. The policy is applicable to all employees both contract and permanent. The company has also developed a five-year housing plan (2022 to 2026) which aims at making more houses available to accommodate the workers. The plan was made available to the audit team for review. Currently the company has some houses which are</p>	<p>Non-compliance</p>

	<p>upgrade of infrastructure. A reasonable time (5 years) is allowed to upgrade the infrastructure.</p> <p>- Critical (Major) compliance -</p>	<p>available to the workers.</p> <p>Field visits to some of the housing in Sanga Sanga, Kadima show most of the houses are without appropriate bathrooms and toilets for the workers.</p>	
6.2.5	<p>The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food.</p> <p>- Minor compliance -</p>	<p>There are markets in the various workers' villages which is created by nearby communities who bring their food stuffs and other items for sale. There are also government established markets that workers access for their essential goods. The company has also established mini shops for the workers in Sanga Sanga and Mapangu.</p>	Complied
6.2.6	<p>A DLW is paid to all workers, including those on piece rate/quotas, for whom the calculation is based on achievable quotas during regular work hours.</p> <p>- Minor compliance -</p>	<p>Congo DR has a National daily minimum wage of 7,075 Congolese Franc payable from the 1<sup>st</sup> June 2019 as declared by the government. However, employers in the agricultural sector are giving the option to review the daily minimum rate per a government memo that was made available to the audit team for review. The directive also indicated that the review must be done in consultations with the workers' union</p> <p>Brabanta has reviewed and is currently paying a new minimum wage. However, this figure was reached by the company alone without consulting the workers representative as required by the government directives.</p>	Non-compliance
6.2.7	<p>Permanent, full-time employment is used for all core work performed by the unit of certification. Casual, temporary and day labour is limited to jobs that are temporary or seasonal.</p> <p>- Minor compliance -</p>	<p>The company employs both permanent and contract workers in their operation and all are engaged as full time employees. Permanent works are workers employed directly by the company while contract workers are labours supplied by third party service provider. These contract workers are employed as piece rate workers and all work as full time employees. Contract workers employed by third party contractors is monitored with reference to the countries labour laws. Although there are contract workers, during the audit evidence has sufficiently shows that the contract workers enjoy same benefits as permanent workers in areas such as free medical care, insurance cover, free housing, provision</p>	Complied

		of water and electricity. Other employment terms are according the DRC laws and regulation.	
<b>Criteria 6.3:</b> 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.			
6.3.1	<p><b>(C)</b> A published statement recognising freedom of association and right to collective bargaining in national languages is available and is explained to all workers in languages that they understand, and is demonstrably implemented.</p> <p>- Critical (Major) compliance -</p>	<p>The company has a documented Freedom of Association policy dated 26/02/2017 and signed by the General Manager. The policy indicates that Brabanta supports the right of workers to freely associate with others, including the right to form and join trade unions for the protection of their interests.</p> <p>The policy has been publicly displayed on notice boards in and around the company. It has also been explained to the workers during their daily morning muster as confirmed by the workers during interview</p> <p>However, the company's policy states that the right to the association applies only on condition that it does not interfere with the internal regulations of the company. This was found to infringe or limit the workers' rights to freedom of association. The right to freely join or form an association is subject only to the constitution and must not be at the discretion of the company</p>	Non-compliance
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>Brabanta has a file for all minutes of meetings held between management and the various workers' union executives. The company in every three months hold meetings with the union. The last meeting between management and workers' union was on 24<sup>th</sup> April 2021. Copies of the minutes of meetings were seen and reviewed by the audit team. Copies reviewed include</p> <ol style="list-style-type: none"> <li>1. Minutes of meeting between workers' union and management on 24<sup>th</sup> April 2021. Attendance Workers representatives 12, Management 3</li> <li>2. Minutes of meeting between workers' union and management on</li> </ol>	Non-compliance

		<p>22<sup>nd</sup> December 2020. Attendance Workers representatives 12, Management 2</p> <p>During interview with the different worker’s union they revealed that copies of the minutes of meetings are not shared with them. During a follow up with management they indicated the law does not require the company to share such documents but the union can apply for their copy from the government labour commission. However, management could not provide any evidence (particular law) to support their argument as to why copies of the meetings cannot be shared with the workers’ union</p>	
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>Brabanta has four local unions representing the workers. They are Action, CSC, UNTC and GS. During interview with all four representatives of the workers they confirmed management does not interfere with the formation or operation of the registered unions.</p>	Complied
<b>Criteria 6.4: Children are not employed or exploited.</b>			
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>The company has a documented child labour policy dated 13<sup>th</sup> August 2019. The policy defines Child labour as work that deprives children of their childhood, potential harm and dignity, and which is detrimental to their physical and mental development. Brabanta also complies with all local laws on the minimum employment age and ensures that people under the age of 18 are not employed by the company or by third parties in accordance with the code of the work.</p> <p>However, the policy has no remediation process in place to deal with any identified child labour in their operations. Also a review of the contract between the company and Mr Jean Marie Ilongo for the keeping of bees does not contain a clause on the prohibition of child labour</p>	Non-compliance
6.4.2	<p><b>(C)</b> There is evidence that minimum age requirements are met. Personnel files show that all workers are above the national minimum age or above</p>	<p>Interview with workers on the plantations and with the representatives of the workers as well as field observation establishes that the company does not engage the services of workers below the national minimum</p>	Complied

	company policy minimum age, whichever is higher. There is a documented age screening verification procedure. - Critical (Major) compliance -	working age which is 18 years. Reviewed of the personnel file of two workers establishes conformance. The company verifies the ages of their employees through the national identity cards or electoral cards.	
6.4.3	<b>(C)</b> Young persons may be employed only for non- hazardous work, with protective restrictions in place for that work. - Critical (Major) compliance -	The company does not employ young workers in their operations. Also review of documents and interview with workers did not establish the presence of young workers in the company's operations.	Complied
6.4.4	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 -	The company has a no child labour policy which has been made available to the communities and also posted on all the notice boards of the company. The company does not have a contract of agreement with their Loose fruit Collectors but has communicated the policy to them.	Complied
<b>Criteria 6.5:</b> There is no harassment or abuse in the workplace, and reproductive rights are protected.			
6.5.1	<b>(C)</b> A policy to prevent sexual and all other forms of harassment and violence is implemented and communicated to all levels of the workforce. - Critical (Major) compliance -	The company has a policy against sexual and moral harassment dated 26/02/2017 and approved by the General manager. The policy is displayed on the various notice boards and has also been shared with the various communities. The policy has been explained to workers at their morning muster and this was also confirmed during workers' interview. The sampled workers were able to demonstrate knowledge of the policy during the field visit and interactions	Complied
6.5.2	<b>(C)</b> A policy to protect the reproductive rights of all, especially of women, is implemented and communicated to all levels of the workforce. - Critical (Major) compliance -	The company has a documented policy for the protection of reproductive rights for women dated 22/03/2018 and approved by the General manager. The policy is displayed on the various notice boards and has also been shared with the various communities. The policy has been explained to workers at their morning muster and this was also confirmed during workers' interview. The sampled workers were able to demonstrate knowledge of the policy during the field visit and interactions	Complied

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6.5.3	<p>Management has assessed the needs of new mothers, in consultation with the new mothers, and actions are taken to address the needs that have been identified.</p> <p>- Minor compliance -</p>	<p>During interview with the women at the plantations they did indicated that there has been a meeting to know their needs and actions has been taken to address their needs. This include the adjustment in their reporting and closing time so they can have enough time for their babies.</p> <p>However, they are no documented report on the assessment conducted or any other report on engagements with the nursing mothers.</p>	Non-compliance
6.5.4	<p>A grievance mechanism, which respects anonymity and protects complainants where requested, is established, implemented and communicated to all levels of the workforce.</p> <p>- Minor compliance -</p>	<p>The company has a documented internal and external grievance management procedure last updated on the 10/07/2021 and signed by the Director General. The procedure as reviewed ensures the anonymity of whistle blowers where requested (Clause 3.3), resolves dispute in a timely manner (clause 3.6) and outlines steps to follow to report a grievance. Copies of the procedures has been shared with workers representatives and sensitization on the procedure has been done for the workers at their daily morning musters. Workers interviewed in the three estates demonstrated knowledge of the procedure and also indicated that all reported cases are handled as required by the procedure. Although they stated that most cases are handled by themselves and rarely uses the formal procedure.</p> <p>Although the company does not received many complains, there are records of all cases reported. The report as reviewed has the date in which the report was made, records of the complainant and respondent and the stage of grievance. All the complaint as reviewed during the audit period has reached their conclusive ends with none pending</p>	Complied
<b>Criteria 6.6:</b> No forms of forced or trafficked labour are used.			
6.6.1	<p><b>(C)</b> All work is voluntary and following are prohibited:</p> <ul style="list-style-type: none"> <li>• Retention of identity documents or passports</li> <li>• Payment of recruitment fees</li> </ul>	<p>Brabanta does not have migrant workers in their operations. Workers interviewed indicated that all works are voluntary and there are no contract substitution. Also all the workers have a collective Bargaining agreement with a service condition that applies to all workers</p>	Complied

	<ul style="list-style-type: none"> <li>• Contract substitution</li> <li>• Involuntary overtime</li> <li>• Lack of freedom of workers to resign</li> <li>• Penalty for termination of employment</li> <li>• Debt bondage</li> <li>• Withholding of wages</li> </ul> <p>- Critical (Major) compliance -</p>		
6.6.2	<p><b>(C)</b> Where temporary or migrant workers are employed, a specific labour policy and procedures are established and implemented.</p> <p>- Critical (Major) compliance -</p>	<p>The company employs temporal workers in their operations and in line with this, Brabanta has a documented special labour policy to respect the temporary and daily workers. The policy is dated 25/11/2015 and approved by the General manager. The policy has been posted on the company notice boards and explained to the workers at their muster. Copies of the policy has also been shared with the communities through their chiefs</p>	Complied
<p><b>Criteria 6.7:</b> The unit of certification ensures that the working environment under its control is safe and without undue risk to health.</p>			
6.7.1	<p><b>(C)</b> The responsible person(s) for H&amp;S is identified. There are records of regular meetings between the responsible person(s) and workers. Concerns of all parties about health, safety and welfare are discussed at these meetings, and any issues raised are recorded.</p> <p>- Critical (Major) compliance -</p>	<p>Brabanta has Identified the HSE Manager as the responsible person for the company's Health Safety and Environment. The appointment was verified from the manager's Job description (Definition de Fonction) dated and signed by the General Manager on 03/02/2020. There is an established Health and Safety (H&amp;S) unit under the Sustainability department of the company. The company communicates its health, safety and environment policies, procedures and related issues to workers through a weekly toolbox talk. Each week, the HSE Manager choses one department to talk on Health and Safety issues. Company has records of toolbox talks which were reviewed during the audit. For example, waste management (Gestion des dechets) of 15/2/2021 for the Mill Department. Interviews with managers confirmed that during such toolbox talks, workers are able to give their H&amp;S concerns, but the company did not have any evidence of records of these concerns. A</p>	Non-compliance



		<p>Safety, Health and Environment (SHE) committee is proposed. Interviews with managers further confirmed that a Safety, Health and Environment (SHE) committee has been proposed and that the health and safety concerns of workers are expected to be received at the committee's meeting which is yet to take off.</p> <p>As at the time of the audit, the company got feedback on workers' health and safety concerns from the doctor and administrative issues discussed between the doctor and the general manager. For example, whenever the doctor receives a number of health and safety cases from the workers this is discussed with the general manager from the monthly health and safety report of the company and action taken. For example, the report of abundance of mosquitos because of high malaria clinic attendance report from the clinic was discussed and the company distributed mosquito nets to workers and also sensitization them on environmental cleanness. The audit team there raised this as non-conformity based on the company's acknowledgement of not operationalize its HSE Committee which is expected to receive workers H&amp;S concerns for action to be taken.</p>	
6.7.2	<p>Accident and emergency procedures are in place and instructions are clearly understood by all workers. Accident procedures are available in the appropriate language of the workforce. Assigned operatives trained in first aid are present in both field and other operations, and first aid equipment is available at worksites. Records of all accidents are kept and periodically reviewed.</p> <p>- Minor compliance -</p>	<p>Brabanta has accident and emergency procedures in place with instructions which are in appropriate language and understood workers. The company has an occupational health and safety policy (politique de santé et sécurité au travail Brabanta of 8/7/2021) a Health and Safety SOP (santé et sécurité au Brabanta SA of 8/7/2021. Accidents are investigated, reported both by the company's internal requirements and to the local authorities as applicable. Records were available for review during the audit. Review sighted situation of repeated accident on a specific worker but the team did not get any evidence of how investigations cover such cases. For example, an investigation report on a cut by the Malaysian knife /palm front on the head because there was no helmet of 21/6/20201 for worker with # 2820. Same worker had an</p>	Non-compliance

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		<p>accident recorded in the notebook on 26/4/2021 for a cut on the thigh by a Malaysian knife.</p> <p>The company also has emergency response procedures (procedure de déclenchement en cas d'une situation d'urgence of 8/7/2021). These emergency procedures cover all potential emergencies to include fires or explosions; Medical, Severe weather phenomena; Traffic accident, drowning; Major power outages; Hazardous material spills among others specific to the region. These procedures are written in French, which is the official language, but these are explained to workers during weekly toolbox talk and daily briefing at workplaces. However, several of sampled workers at critical areas of emergency interviewed could not adequately demonstrate understanding of these procedures. For example, at the fuel station in Sanga Sanga. Also, the company has trained and assigned operatives to administer first aid when required. In the field, First Aid kits were provided only at the Division offices and rely on emergency number to call for First Aid assistance when required. The system in its form at the time of the audit was found to be ineffective as workers were not having the required call credit on their phones to make emergency calls. For example, a test done at K10A. The company indicated to have plans to install Toll Free for emergency numbers. Given these inadequacies, the audit team raised a non-conformity.</p>	
6.7.3	<p><b>(C)</b> Workers use appropriate personal protective equipment (PPE), which is provided free of charge to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, land preparation, and harvesting. Sanitation facilities for those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing.</p> <p>- Critical (Major) compliance -</p>	<p>Brabanta provided PPEs free of charge to all of its workers to cover all potentially hazardous operations as identified in its risk assessment. Section 4 "Equiments de Protection Individuelle" of the HSE SOP "Revision 00" of 28/06/2016 specifies the compulsory requirement to wear PPEs and identifies PPEs for identified risks in section 5 (Les risques identifier) of the HSE SOP for its operations. The company has provided PPEs free of charge to its workers and made distribution records available for review by the audit team during the audit. For example, PPE distribution report for June 2021. Interviews with workers at their</p>	Non-compliance

		<p>work post who were using PPEs confirmed to have received their PPEs free of charge. However, several workers from the Mill, harvesting operations and other operational sites sighted and interviewed by the audit team were not using their provided PPEs. For example, at the Ramp in the Mill, some workers were seen to have hanged their provided gloves and using their bare hands. at the Kadima Water Catchment at block D9 site some workers had their Wellington boots removed and placed beside them while working in the swamps. Harvesters for example in Block N11, D9 and A6 were not using uniforms for body protection consistent with the risk identified by the company. Workers at the chemical stores were also not using respirators as required by the company's procedures. For example, shelves at the KCI Depot 3 where fungicides such as Addax DG were stored. Also, the company has provided sanitation facilities for workers handling pesticides to change out of PPE to wash down and put on their personal clothing after the day's work. The design of the of the sanitation facilities at Sanga Sanga for pesticide applicators is such that, it can lead to the contamination of their personal clothing. from PPEs used in the field before they change out and wash. The audit concluded that these constitute a non-conformity.</p>	
6.7.4	<p>All workers are provided with medical care and covered by accident insurance. Costs incurred from work-related incidents leading to injury or sickness are covered in accordance with national law or by the unit of certification where national law does not offer protection.</p> <p>- Minor compliance -</p>	<p>Brabanta provides medical care and accident insurance cover for its workers to include the cost incurred from work related accidents. The company operates a hospital and number of 4 other dispensaries which are available free of charge to workers. Cost of medical treatment referred to other medical facilities are also covered by the company. These were confirmed from review of records and interviews with workers. Workers confirmed to receive free medical care from the company's hospital, the dispensaries and treatment outside when necessary, with an example of airlifting workers for treatment in the capital city.</p>	Complied

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		<p>The company has provided insurance cover for work related accidents for its workers. The audit team reviewed records of accident insurance cover and further confirmed from interview with workers. For example, payment for work accident insurance receipt #020921020053R of 21/01/2022 for US\$7878 covering 50 workers valid for 12 months</p>	
<p>6.7.5</p>	<p>Occupational injuries are recorded using Lost Time Accident (LTA) metrics.          - Minor compliance -</p>	<p>Brabanta has accident recording system in place and recorded accidents to include Lost Time Accidents (LTA) in lost days.. The maintained records of accidents across all operational sites under identified work accidents and occupational diseases. Accidents are recorded by medical officers at the company’s hospital and Dispensaries namely” Hôpital Mapangu, Dispensaire Sanga Sanga, Dispensaire Lumbundji and Dispensaire Kalomba.</p> <p>Accident records (fichier accident de travail actualize 2021) covering 2019, 2020 and 2021 were made available for review by the audit team during the audit. For each specified work accident and occupational disease, the records included</p> <ol style="list-style-type: none"> <li>1. Total number of accidents,</li> <li>2. Number of accidents with lost time,</li> <li>3. Number of accidents with consequences,</li> <li>4. Death and</li> <li>5. Number of lost days.</li> </ol> <p>For example, from January 2021 to time of the audit, Palm thorn pricks (Piqûre d'epine de palmier) has recorded the highest number of 175 accidents with 165 lost days followed by Injury by Malay knife and machete (blessure par couteau malais, machette) a total of 53 and 184 lost days respectively.</p>	<p>Complied</p>

**Principle 7: Protect the environment, conserve biodiversity and ensure sustainable management of natural resources.**

**Criteria 7.1: Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management (IPM) techniques.**

7.1.1	<p><b>(C)</b> IPM plans are implemented and monitored to ensure effective pest control.</p> <p>- Critical (Major) compliance -</p>	<p>Brabanta has developed an integrated pest management plan (<i>Plan de Gestion Integree des Ravageurs, Document Code GIR, Document Index 00, revised on 05/07/2021</i>) for the management of identified pest categories such as <i>Coelaenomodera minuta</i>, <i>Oryctes monoceros</i>, rats, birds and <i>Cercospora elaeidis</i>.</p> <p>For each identified pest type, the IPM outlines a management strategy for routine and special control measures.</p> <p>Chapter 12 of the IPM plan clearly stipulates that prophylactic use of pesticides in pest control is not a recommended approach at Brabanta. Pesticides are used uniquely for curative treatment.</p>	Complied
7.1.2	<p>Species referenced in the Global Invasive Species Database and CABI.org are not to be used in managed areas, unless plans to prevent and monitor their spread are implemented.</p> <p>- Minor compliance -</p>	<p>No species referenced in Global Invasive Species Database and CABI.org are used in managed areas.</p>	Complied
7.1.3	<p>There is no use of fire for pest control unless in exceptional circumstances, i.e. where no other effective methods exist, and with prior approval of government authorities. [For NI to define process].</p> <p>- Minor compliance -</p>	<p>Brabanta has a zero-fire use policy. No use of fire was observed at the time of the audit.</p>	Complied
<p><b>Criteria 7.2:</b> Pesticides are used in ways that do not endanger health of workers, families, communities or the environment.</p>			
7.2.1	<p><b>(C)</b> Justification of all pesticides used is demonstrated. Selective products and application methods that are specific to the target pest, weed or disease are prioritized.</p> <p>- Critical (Major) compliance -</p>	<p>Brabanta has developed an environmental policy (<i>Politique Environnementale</i> of 22/06/2018) that guides its operations. The policy prescribes an environmental management system aimed at documenting, implementing and reducing the environmental impacts of all Brabanta operations on both the natural and social environment.</p> <p>Additionally, Brabanta has developed a number of procedures for the selective use of products and application methods that are specific to the target pest, weed or disease. Examples include:</p>	Complied

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		<ul style="list-style-type: none"> <li>• Procedure for the control and fight against pests: Rhyncophorus (Procédure de Contrôle et Lutte Contre les Ravageurs: Rynchophorus) of 23/08/2019, Document Ref.: CLCR, Index 01.</li> <li>• Procedure for sanitization of ganoderma (Procédure de la Sanitization du Ganoderma) of 23/08/2019; document Ref. SAGA, Index 01</li> </ul>	
7.2.2	<p><b>(C)</b> Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per ha and number of applications) are provided.</p> <p>- Critical (Major) compliance -</p>	Records of pesticides (including active ingredients used and their LD50, area treated, amount of active ingredient applied per hectare and number of applications) are kept, at the level of departmental stores, the main chemical storage facility and at the agronomy department. The records for 2021 were viewed during the audit.	Complied
7.2.3	<p><b>(C)</b> Any use of pesticides is minimised as part of a plan, eliminated where possible, in accordance with IPM plans.</p> <p>- Critical (Major) compliance -</p>	<p>As part of the pesticides reduction plan, Brabanta has developed an integrated pest management plan (<i>Plan de Gestion Integree des Ravageurs</i>, Documents Code GIR, Document Index 00, revised on 05/07/2021). This plan sets critical limits to determine use of pesticides. For each identified pest type, the IPM outlines a management strategy for routine and special control measures.</p> <p>The plan prioritizes physical elimination over chemical usage e.g., for <i>coelaen</i> and <i>Ganoderma</i>. Additionally, mechanical traps are used as part of the IPM plan.</p>	Complied
7.2.4	<p>There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in national best.</p> <p>- Minor compliance -</p>	<p>Brabanta has developed an integrated pest management plan (<i>Plan de Gestion Integree des Ravageurs</i>, Documents Code GIR, Document Index 00, revised 0n 05/07/2021) for the management of identified pest categories such as <i>Coelaenomodera minuta</i>, <i>Oryctes monoceros</i>, <i>rats</i>, <i>birds</i> and <i>Cercospora elaeidis</i>.</p> <p>Chapter 12 of the IPM plan clearly stipulates that prophylactic use of pesticides in pest control is not a recommended approach at Brabanta. Pesticides are used uniquely for curative treatment.</p>	Complied

<p>7.2.5</p>	<p>Pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat, are not used, unless in exceptional circumstances, as validated by a due diligence process, or when authorised by government authorities for pest outbreaks.</p> <p>The due diligence refers to:</p> <ul style="list-style-type: none"> <li>- Minor compliance -</li> </ul> <p>7.2.5a Judgment of the threat and verify why this is a major threat</p> <p>7.2.5b Why there is no other alternative which can be used</p> <p>7.2.5c Which process was applied to verify why there is no other less hazardous alternative</p> <p>7.2.5d What is the process to limit the negative impacts of the application</p> <p>7.2.5e Estimation of the timescale of the application and steps taken to limit application to the specific outbreak.</p>	<p>The register of chemicals for 2021 was viewed during the audit. According to this register, no pesticides in this category feature on the list of pesticides used by the unit of certification.</p>	<p>Complied</p>
<p>7.2.6</p>	<p><b>(C)</b> Pesticides are only handled, used or applied by persons who have completed the necessary training and are always applied in accordance with the product label. All precautions attached to the products are properly observed, applied, and understood by workers (see Criterion 3.6). Personnel applying pesticides must show evidence of regular updates on the knowledge about the activity they carry out.</p> <ul style="list-style-type: none"> <li>- Critical (Major) compliance -</li> </ul>	<p>The personnel training plan (<i>Plan de formation 2021</i>) for the year 2021 was presented during the audit. The Plan includes aspects such as: waste management, storage of chemicals, management of storage zones for chemicals, management of leakages, etc.</p> <p>Training records for use of chemicals for different pests were provided during the audit e.g.:</p> <ul style="list-style-type: none"> <li>• Control of Coelaen on 05/06/2021</li> <li>• Methods to fight against parasites: 07/05/2021</li> <li>• Methods of sanitation of Ganoderma and fusariose: 12/04/2021</li> <li>• Sanitation of SRC: 18/03/2021 (Matricules 1606, 1338, 9160, 8534)</li> <li>• Training in Chemical operations, conducted on 11/02/2021 (Matricules: 2199, 333, 2154, 1756, 7158)</li> </ul>	<p>Complied</p>

		<ul style="list-style-type: none"> <li>• Training in Dangers of Pesticides conducted on 11/02/2021 (Matricules: 465, 6462, 8744, 6778).</li> </ul> <p>Interviews with personnel applying pesticides confirmed that they receive regular training to update their knowledge about the activities they carry out.</p>	
7.2.7	<p><b>(C)</b> Storage of all pesticides is in accordance with recognised best practices.</p> <p>- Critical (Major) compliance -</p>	<p>Brabanta has developed a procedure to guide the storage of chemicals, including pesticides (<i>Procedure de Stockage des Produits Chimiques, Code STPC of 25/08/2015</i>)</p> <p>HSE has developed a checklist for the monitoring of storage zones for pesticides (<i>STPC/FOR1: Checklist</i>). This checklist is used for monitoring on a regular basis. The checklist encompasses issues of safety, security, proper aeration, inventories, PPE, etc. in and around the storage zones. A monthly action plan for the monitoring of storage areas has been developed by the unit of certification. The action plan for the month of August was presented during the audit.</p> <p>However, at the main chemical/pesticides storage site, expired chemicals were found stored in the same space as chemicals that are still being used.</p> <p>This was the case with KCl in Depot 2, with expiry date of 01/2021. Additionally, in Depot 3, we found that 2, 4D Amine (720g/l), manufactured on 27/02/2011, was stored. Whereas the information sheet on the container says the product expires after two years (i.e., 2013 in this case), the product was still found on the shelves in Depot 3. Other expired products were equally found on the shelves in Depot 3, namely Addax and Carbalm.</p>	Non-compliance
7.2.8	All pesticide containers are properly disposed of and/or handled responsibly if used for other purposes.	Brabanta has developed a waste management policy that includes management of pesticide containers ( <i>Procedure de Gestion des Dechets,</i>	Complied



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	<p>- Minor compliance -</p>	<p><i>Code: GDD, Index: 00 of 15/10/2015</i>). This procedure includes a Checklist for tracking different types of waste including pesticide containers (<i>GDD/FOR1: Check Liste Gestion des Dechets</i>).</p> <p>Additionally, Brabanta has developed a procedure for management of waste storage sites within its facility (<i>Gestion de la Decheterie Interne, Code GDI, Index: 00, of 23/04/2020</i>). This procedure lays down the framework for handling and storage of waste, including pesticide containers at the different waste storage sites within Brabanta.</p> <p>The procedure classifies waste types, handling/storage methods, associated risks, and PPE required by personnel in the waste storage areas.</p> <p>Storage sites for pesticide containers and other waste types were visited during the audit and found to be adequate. Additionally, interviews with staffs at the waste storage site confirmed that they are properly trained to carry out their activities.</p>	
7.2.9	<p><b>(C)</b> Aerial spraying of pesticides is prohibited, unless in exceptional circumstances where no other viable alternatives are available. This requires prior government authority approval. All relevant information is provided to affected local communities at least 48 hours prior to application of aerial spraying.</p> <p>- Critical (Major) compliance -</p>	<p>No aerial spraying is practiced across the entire unit of certification.</p>	Complied
7.2.10	<p><b>(C)</b> Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated.</p> <p>- Critical (Major) compliance -</p>	<p>Specific annual medical surveillance for chemical operators is conducted annually by the medical unit of Brabanta.</p> <p>Before a new staff begins with spraying activity, a baseline sampling is conducted. Samples collected include blood, faeces, urine for testing, meanwhile other parameters such as weight are equally taken. The staffs are then subjected to annual surveillance to control these values over time.</p>	Complied

		<p>Records for the last annual medical surveillance for chemical operators were consulted at the Brabanta medical unit. The last exercise took place on 09/07/2021 and the following Registration Numbers, all pertaining to chemical operators, were sampled:</p> <ul style="list-style-type: none"> <li>• Mat. 830</li> <li>• Mat. 9043</li> <li>• Mat. 8695</li> <li>• Mat. 8698</li> </ul> <p>Interviews with these individuals confirmed that they are effectively subjected to annual medical surveillance by the Brabanta health unit.</p>	
7.2.11	<p><b>(C)</b> No work with pesticides is undertaken by persons under the age of 18, pregnant or breastfeeding women or other people that have medical restrictions and they are offered alternative equivalent work.</p> <p>- Critical (Major) compliance -</p>	<p>Brabanta has developed a No Child Labour Policy (<i>Politique Concernant le Travail des Enfants, of 13/08/2019</i>). This policy formally prohibits child labour in all Brabanta operations, including work with chemicals.</p> <p>Additionally, Brabanta has developed a policy to protect the reproductive rights of women (<i>Politique de Protection de Droit a la Reproduction Chez la Femme, of 22/03/2018</i>). This policy formally forbids pregnant and breastfeeding mothers from carrying out any work with chemicals up the 9<sup>th</sup> breastfeeding month after birth.</p> <p>Interviews with workers confirmed that workers with health conditions are offered alternative equivalent work.</p>	Complied
<p><b>Criteria 7.3:</b> Waste is reduced, recycled, reused and disposed of in an environmentally and socially responsible manner.</p>			
7.3.1	<p>A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented.</p> <p>- Minor compliance -</p>	<p>Brabanta has developed a waste management procedure that (<i>Procedure de Gestion des Dechets, Code: GDD, Index: 00 of 15/10/2015</i>). This procedure includes a Checklist for tracking different types of waste (<i>GDD/FOR1: Check Liste Gestion des Dechets</i>). Additionally, Brabanta has developed an Annual HSE Plan that encompasses all departments and their waste types.</p>	Complied

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		<p>Interviews with HSE staffs revealed that 4 HSE meetings are held every month to address waste management sensitizing (<i>Minutes HSE</i>). Reports for the HSE meetings about waste management of 09/05/2021, and 25/05/2021 including attendance sheets were reviewed at the time of the audit. The theme of the HSE meetings was Management of Wastes (in Camps for 25/08/2021), and (waste management, waste segregation for 09/05/2021).</p> <p>The waste management procedure previously cited outlines different waste management options for the different types of waste produced.</p> <p>Visits to camps' waste collection points (Kanagai) confirmed that Brabanta's waste management plan is being respected.</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>Waste management procedures are fully understood by workers and managers, as demonstrated at waste collection sites.</p> <p>Interviews with workers at different camps revealed that they understood basic techniques of waste separation into: organic and non-biodegradable waste.</p> <p>At the camps observations were made that confirmed the fact that wastes are segregated according to types.</p> <p>Additionally, Brabanta has put in place a programme to recycle plastic waste for the production of pavement blocks to maintain some parking areas within the unit of certification. The production site of the pavement blocks from recycling of plastic waste was visited at the time of the audit.</p>	Complied
7.3.3	<p>The unit of certification does not use open fire for waste disposal.</p> <p>- Minor compliance -</p>	<p>Brabanta has developed a zero use of fire policy (<i>Procedure de Lutte Anti-incendie, Code: PAI, of 01/12/2015</i>), that helps to track and manage all fire incidents within the unit of certification.</p> <p>Field observations revealed that the unit of certification does use open fire for waste disposal.</p>	Complied

Criteria 7.4: Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.			
7.4.1	<p>Good agriculture practices, as contained in SOPs, are followed to manage soil fertility to optimise yield and minimise environmental impacts.</p> <p>- Minor compliance -</p>	<p>Good agricultural practices to manage soil fertility and to optimise yields and minimise environmental impacts are implemented and documented.</p> <p>For this, Brabanta has developed a series of SOPs including but not limited to:</p> <ul style="list-style-type: none"> <li>• Procedure for Palm Fertilization (Procédure de fertilization de Palmier a Huile, Document Code: FPH, Version 01, of 31/08/2019)</li> <li>• Procedure for harvesting (Procédure de Prevision de la Recolte, Code : PRE, Version 01 of 23/08/2019)</li> <li>• Procedure for Pruning (Procédure d'Elargage Palmiers a Huile, Code : EPH of 05/04/2019).</li> <li>• Procedure for plantation maintenance (Procédure d'Instruction et Control des Operations d'Entretien en Plantation, Code : ICOE, of 23/08/2019)</li> </ul> <p>Additionally, records of EFB application in fields to compensate for organic fertilization were seen during the time of the audit.</p>	Complied
7.4.2	<p>Periodic tissue and soil sampling is carried out to monitor and manage changes in soil fertility and plant health.</p> <p>- Minor compliance -</p>	<p>Periodic soil and tissue sampling is carried out by Brabanta. Interviews with staff of the agronomic department revealed that soil analyses are done every 2 years, while tissue analyses are done every year.</p> <p>The report of annual tissue sampling for 2020 (<i>Campagne de Diagnostic Foliaire Palmier (2020), Plantation Brabanta, Rapport Annexe</i>), was seen during the time of the audit. The report revealed that soil and tissue sampling was conducted on certain portions of the plantation, i.e. 23 soil samples, and 22 tissue samples.</p> <p>The results of the sampling are used in determining the quantities of fertilizers applied.</p>	Complied

7.4.3	<p>A nutrient recycling strategy is in place, which includes the recycling of Empty Fruit Bunches (EFB), Palm Oil Mill Effluent (POME), palm residues and optimal use of inorganic fertilisers.</p> <p>- Minor compliance -</p>	<p>A nutrient recycling strategy that includes use of EFB, and POME is in place. Records of EFB application in fields to compensate for organic fertilization were seen during the time of the audit. However, at the time of the audit, no evidence was found to support the use of POME.</p> <p>Additionally, there are no clearly assigned, and appropriate zones for storage of EFB and fiber. Fiber storage zones behind the mill pose a contamination risk to the neighboring Kasi River. This is raised as an OFI to follow up in the next audit</p>	OFI
7.4.4	<p>Records of fertiliser inputs are maintained.</p> <p>- Minor compliance -</p>	<p>There exists an Annual Fertilizer Plan. The plan for 2021 was seen at the time of the audit, and includes quantities and types of fertilizers applied per division of the plantation, among other things. The quantities of fertilizer applied and recorded are based on the results of the tissue and soil analyses.</p>	Complied
<b>Criteria 7.5:</b> Practices minimise and control erosion and degradation of soils.			
7.5.1	<p><b>(C)</b> Maps identifying marginal and fragile soils, including steep terrain, are available.</p> <p>- Critical (Major) compliance -</p>	<p>Maps identifying soils and topographic maps are available and were seen during the audit.</p> <p>Programme de Cartographie conducted: Brabanta Regional Soil Map (Brabanta_Regional_Soil_Map_HWSD_v1.21) shows soil maps.</p> <p>Additionally, the HCV Assessment (HCV assessments for the SOCFIN Brabanta Oil Palm Plantation in Mapangu, Democratic Republic of Congo, Final Version of May 2020) assessed soils in the Brabanta concession.</p>	Complied
7.5.2	<p>There is no extensive replanting of oil palm on steep terrain.</p>	<p>The Socfin Oil Palm Manual: Norms and Procedures, Version 1 of 2016 prescribes agricultural practices company-wide.</p> <p>Specifically, Section 4 on Plantation Design defines the planting design to be used at different inclinations. E.g. from 19-40% terracing is required while for 9-19% use of individual platforms is used. Additionally, according to the HCV assessment, only slopes of 20% were</p>	Complied

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		identified in the Brabanta concession. The steep slope analysis conducted based on Digital Elevation Model (DEM) revealed that the slope of Brabanta concession varies from 0 to 20 degree and that nowhere within the concession boundaries has a slope greater than 20 degrees. According to the Socfin Oil Palm Manual: Norms and Procedures, Version 1 of 2016 planting is only carried out in areas of inclination of less than 20%. Therefore, there was no planting of oil palm on steep terrain as observed during field visit to the estates.	
7.5.3	There is no new planting of oil palm on steep terrain. - Minor compliance -	There is no new planting since 2014.	Complied
<b>Criteria 7.6:</b> Soil surveys and topographic information are used for site planning in the establishment of new plantings, and the results are incorporated into plans and operations.			
7.6.1	<b>(C)</b> To demonstrate the long-term suitability of land for palm oil cultivation, soil maps or soil surveys identifying marginal and fragile soils, including steep terrain, are taken into account in plans and operations. - Critical (Major) compliance -	The HCV Assessment (HCV assessments for the SOCFIN Brabanta Oil Palm Plantation in Mapangu, Democratic Republic of Congo, Final Version of May 2020) assessed soils in the Brabanta concession. According to the HCV assessment, the soil in the plantation area is predominantly sandy clay loam with sand dominating the entire texture. However, the risk of critical soil erosion due to steep slopes in the plantation appears relatively low as a result of the low-lying and generally flat topography in most of the plantation. The steep slope analysis conducted during the HCV assessment was based on Digital Elevation Model (DEM) and it revealed that the slope of Brabanta concession varies from 0 to 20 degree.	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 -	There is no extensive planting on marginal or fragile soils and in accordance with the Socfin Oil Palm Manual: Norms and Procedures, Version 1 of 2016, terraces have been established at places deemed to be steep slopes to avoid and control erosion.	Complied

7.6.3	Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure. - Minor compliance -	Soil surveys and topographic information are used to guide road construction and maintenance operations. The road maintenance program is designed to prevent erosion.	Complied
<b>Criteria 7.7:</b> No new planting on peat, regardless of depth after 15 November 2018 and all peatlands are managed responsibly.			
7.7.1	<b>(C)</b> There is no new planting on peat regardless of depth after 15 November 2018 in existing and new development areas. - Critical (Major) compliance -	The HCV Assessment (HCV assessments for the SOCFIN Brabanta Oil Palm Plantation in Mapangu, Democratic Republic of Congo, Final Version of May 2020), indicates the occurrence of peat in the adjacent Kasai River and very limited occurrence (ca 1.5 ha) in parts of the Brabanta concession.  No planting was done in these areas.	Complied
7.7.2	Areas of peat within the managed areas are inventoried, documented and reported (effective from 15 November 2018) to RSPO Secretariat. - Minor compliance -	The HCV assessment revealed that, while no detailed field assessment has been done, review of available data indicates the occurrence of peat in the adjacent Kasai River and very limited occurrence (ca 1.5 ha) in parts of the Brabanta concession.	Complied
7.7.3	<b>(C)</b> Subsidence of peat is monitored, documented and minimised. - Critical (Major) compliance -	Not applicable. There is no planting on peat	Not Applicable
7.7.4	<b>(C)</b> A documented water and ground cover management programme is in place. - Critical (Major) compliance -	Same as above	Not Applicable
7.7.5	<b>(C)</b> For plantations planted on peat, drainability assessments are conducted following the RSPO Drainability Assessment Procedure, or other RSPO recognised methods, at least five years prior to replanting. The assessment result is used to set the timeframe for future replanting, as well as for phasing out of oil palm cultivation at least 40 years, or two cycles, whichever is greater, before reaching the natural gravity drainability limit for peat. When oil palm is phased out, it is replaced	Not applicable	Not Applicable

	with crops suitable for a higher water table (paludiculture) or rehabilitated with natural vegetation. - Critical (Major) compliance -		
7.7.6	<b>(C)</b> All existing plantings on peat are managed according to the 'RSPO Manual on Best Management Practices (BMPs) for existing oil palm cultivation on peat', version 2 (2018) and associated audit guidance. - Critical (Major) compliance -	Not applicable. No planting has been done in peat soils.	Not Applicable
7.7.7	<b>(C)</b> All areas of unplanted and set-aside peatlands in the managed area (regardless of depth) are protected as "peatland conservation areas"; new drainage, road building and power lines by the unit of certification on peat soils is prohibited; peatlands are managed in accordance with the 'RSPO BMPs for Management and Rehabilitation of Natural Vegetation Associated with Oil Palm Cultivation on Peat', version 2 (2018) and associated audit guidance. - Critical (Major) compliance -	Not applicable.	Not Applicable
<b>Criteria 7.8:</b> Practices maintain the quality and availability of surface and groundwater.			
7.8.1	A water management plan is in place and implemented to promote more efficient use and continued availability of water sources and to avoid negative impacts on other users in the catchment. The plan addresses the following: - Minor compliance - 7.8.1a The unit of certification does not restrict access to clean water or contribute to pollution of water used by communities.	A water management plan exists and was seen during the audit. There are several water collection points for testing water quality. These include: <ul style="list-style-type: none"> <li>• Kalomba 1 and 2</li> <li>• Mapangu I and 2</li> <li>• Kabala</li> <li>• Shanga 1 and 2</li> <li>• Sanga Sanga</li> </ul> Results of water analysis were seen at the time of the audit. The analysis was conducted by Ecole de Sante Publique de Kinshasa (on 09/08/2021)	Complied



		Ref : ESP/VD/DIR/MK/777/NM/2021, and the aspects analysed included faecal analysis, turbidity, pH, physico-chemical parameters, etc.	
	7.8.1b Workers have adequate access to clean water.	Workers have adequate access to clean water through as system of water points developed by Brabanta. The water points have been provided for riparian village communities. Additionally, Brabanta supplies water with the use of water tanks to some residential areas.	
7.8.2	<p><b>(C)</b> Water courses and wetlands are protected, including maintaining and restoring appropriate riparian and other buffer zones in line with 'RSPO Manual on BMPs for the management and rehabilitation of riparian reserves' (April 2017).</p> <p>- Critical (Major) compliance -</p>	<p>Brabanta monitors buffer zones as part of its HCV monitoring activities (Plan d'Action – Zone HVC, dated May 2020). This is done as part of the measures to the maintain and restore appropriate riparian and other buffer zones.</p> <p>According to the HCV management plan, measures include: sensitization of workforce and local populations; sustainable management of swamps, identification and delineation of buffer zones.</p> <p>Whereas water courses and wetlands are protected and actions such as clearly marking of riparian zones have been undertaken, Brabanta does not conduct water analysis of neighbouring rivers: Kasai, Lumbundji to determine whether their activities are impacting on the rivers.</p>	OFI
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>The unit of certification has constructed a system made of 5 lagoons (1 for cooling, 2 for anaerobic digestion, and 2 for aerobic digestion) and one wastewater retention basin.</p> <p>However, no BOD/COD analyses are conducted to determine the efficiency of the lagoon treatment system. Moreover, the waste water retention basin at the end of the lagoon system has some leakages, hence there is possible contamination of adjacent Kasai River, especially considering that BOD/COD assessments are not done.</p>	Non-compliance

		Interviews with Company staffs revealed that laboratory equipment for BOD and COD analyses have been sourced but testing of the mill effluent is yet to begin.	
7.8.4	Mill water use per tonne of FFB is monitored and recorded. - Minor compliance -	Mill water use per tonne of FFB is monitored and recorded. Data for the months January to July 2021 were reviewed during the audit and the mill water use per tonne of FFB is 1.16.	Complied
<b>Criteria 7.9:</b> Efficiency of fossil fuel use and the use of renewable energy is optimised			
7.9.1	A plan for improving efficiency of the use of fossil fuels and to optimize renewable energy is in place, monitored and reported. - Minor compliance -	Brabanta has developed an action plan for the reduction of use of fossil fuels ( <i>Plan d'Actions pour la Reduction de l'Utilisation des Energies Fossiles</i> , with document Ref.: PREF, Index 00, of 23/07/2021). However, this plan is neither being implemented, monitored, nor reported.	Non-compliance
<b>Criteria 7.10:</b> Plans to reduce pollution and emissions, including greenhouse gases (GHG), are developed, implemented and monitored and new developments are designed to minimise GHG emissions.			
7.10.1	<b>(C)</b> GHG emissions are identified and assessed for the unit of certification. Plans to reduce or minimize them are implemented, monitored through the Palm GHG calculator and publicly reported. - Critical (Major) compliance -	Whereas the Unit of certification has identified some GHG emissions from different operations, and reports these publicly on Palm GHG, no plan to reduce or minimise the GHG has been developed by Brabanta.	Non-compliance
7.10.2	<b>(C)</b> Starting 2014, the carbon stock of the proposed development area and major potential sources of emissions that may result directly from the development are estimated and a plan to minimize them prepared and implemented (following the RSPO GHG Assessment Procedure for New Development). - Critical (Major) compliance -	No new developments in Brabanta since 2014.	Complied
7.10.3	<b>(C)</b> Other significant pollutants are identified and plans to reduce or minimize them implemented and monitored.	Brabanta GHG calculation captures all significant pollutants including POME which is monitored on regular basis as mentioned in 7.8.3 above.	Complied

	- Critical (Major) compliance -		
<b>Criteria 7.11:</b> Fire is not used for preparing land and is prevented in the managed area.			
7.11.1	<b>(C)</b> Land for new planting or replanting is not prepared by burning. - Critical (Major) compliance -	Brabanta has a zero-fire use policy according to The Socfin Oil Palm Manual: Norms and Procedures, Version 1 of 2016. No use of fire in land preparation.	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 -	Brabanta has developed a procedure to monitor and fight fires (Procedure de Lutte Anti-Incendie, Code: LAI, Version 00 of 01/12/2015), that describes prevention and control measures to be taken in case of a fire outbreak in all its operations including in the plantation).	Complied
7.11.3	The unit of certification engages with adjacent stakeholders on fire prevention and control measures. - Minor compliance -	A team charged with monitoring fires exists. Additionally, Brabanta carries out sensitization campaigns within communities on zero fire use. Community liaison unit ( <i>Service de liaison communautaires</i> ) relays with local communities and sensitizes them on use of fire and conducts sensitization on combating fires. Reviewed minutes of meetings with communities. They include: Theme: Socialization of the Policy on Human Rights Defenders and Fight Against Fires, Venue: Nkanga Village (12/07/2021), Mwandumba (13/07/2021), and Mwatshingembo Villages; were seen during the audit.	Complied
<b>Criteria 7.12:</b> Land clearing does not cause deforestation or damage any area required to protect or enhance High Conservation Values (HCVs) or High Carbon Stock (HCS) forest. HCVs and HCS forests in the managed area are identified and protected or enhanced.			
7.12.1	<b>(C)</b> Land clearing since November 2005 has not damaged primary forest or any area required to protect or enhance HCVs. Land clearing since 15 November 2018 has not damaged HCVs or HCS forests.	Brabanta has not undertaken new land clearing since November 2005 except for two management unit (Savannah, Lumbundji) which are not within the scope of this audit. The Brabanta Oil Palm Plantation is a replant of an old oil palm plantation that was established in 1911 by	Complied

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	<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>Unilever before the plantation was handed back to the DRC government for management. The replanting began in 2009, with a phased planting of the various blocks of the plantation until 2014.</p>	
7.12.2	<p><b>(C)</b> HCVs, HCS forests and other conservation areas are identified as follows:</p> <p>- Critical (Major) compliance -</p> <p>7.12.2a For existing plantations with an HCV assessment conducted by an RSPO-approved assessor and no new land clearing after 15 November 2018, the current HCV assessment of those plantations remains valid.</p>	<p>Brabanta has no new land clearing from 15 November 2018 except for Savannah, Lumbundji which are excluded from the scope of this audit. However, Brabanta has valid HCVs assessment report in place.</p> <p>HCV Assessment (HCV assessments for the SOCFIN Brabanta Oil Palm Plantation in Mapangu, Democratic Republic of Congo, Final Version of May 2020), was conducted by Proforest.</p>	Complied
	<p>7.12.2 b: Any new land clearing (in existing plantations or new plantings) after 15 November 2018 is preceded by an HCV-HCS assessment, using the HCSA Toolkit and the HCV-HCSA Assessment Manual. This will include stakeholder consultation and take into account wider landscape-level considerations.</p>	<p>The Brabanta Oil Palm Plantation is a replant of an old plantation that was established in 1911 by Unilever. The replanting began in 2007, with a phased planting of the various blocks of the plantation.</p> <p>No new land clearing was carried out in the existing plantation. However, Brabanta carried out an HCV Assessment (HCV assessments for the SOCFIN Brabanta Oil Palm Plantation in Mapangu, Democratic Republic of Congo, Final Version of May 2020), was conducted by Proforest, with Armand Yevide as Lead Assessor.</p>	
7.12.3	<p><b>(C)</b> In High Forest Cover Landscapes (HFCLs) within HFCCs, a specific procedure will apply for legacy cases and development by indigenous peoples and local communities with legal or customary rights, taking into consideration regional and national multi-stakeholder processes. Until this procedure is developed and endorsed, 7.12.2 applies.</p> <p>- Critical (Major) compliance -</p>	<p>Congo DR is not classified as a High Forest Cover Country and as Brabanta is not in a In High Forest Cover Landscapes (HFCLs)</p>	Complied
7.12.4	<p><b>(C)</b> Where HCVs, HCS forests after 15 November 2018, peatland and other conservation areas have been identified, they are protected and/or enhanced. An integrated management plan to protect and/or enhance HCVs, HCS forests, peatland and other conservation areas is developed, implemented and adapted where necessary, and contains monitoring</p>	<p>Brabanta has not commissioned any new plantings in its Concessions since 15 November, 2018. Current developed area been a replanting and an HCV Assessment was conducted. Additionally, as part of the HCV Assessment, management and monitoring recommendations were made by Proforest (Chapter 7). Based on this, Brabanta has developed</p>	Complied

	<p>requirements. The integrated management plan is reviewed at least once every five years. The integrated management plan is developed in consultation with relevant stakeholders and includes the directly managed area and any relevant wider landscape level considerations (where these are identified).</p> <p>- Critical (Major) compliance -</p>	<p>management and monitoring plans for all the HCVs identified in its concession. The management and monitoring plan was viewed at during the audit.</p> <p>Management actions include demarcation of HCVs in collaboration with local communities, sensitization of riparian local communities. Meanwhile, monitoring activities include participatory actions with local communities to identify and report incidents such as bushfires, etc.</p>	
7.12.5	<p>Where rights of local communities have been identified in HCV areas, HCS forest after 15 November 2018, peatland and other conservation areas, there is no reduction of these rights without evidence of a negotiated agreement, obtained through FPIC, encouraging their involvement in the maintenance and management of these conservation areas.</p> <p>- Minor compliance -</p>	<p>The HCV assessment identified social HCVs including HCV 5 and 6 and has been documented as such. From the assessment report, it was clear that the HCV assessment team carried out consultations with the communities around the concession and involved them in the identification and mapping of such sites. This was also confirmed by the communities during the audit stakeholder meetings. Additionally, Brabanta does not restrict communities from accessing the social HCVs as confirmed by the communities during the consultations. Monitoring of social HCV is done by Brabanta in collaboration with the communities. However, Brabanta is not permitted into community sacred sites because these are kept secret and have not been disclosed to Brabanta.</p>	Complied
7.12.6	<p>All rare, threatened or endangered (RTE) species are protected, whether or not they are identified in an HCV assessment. A programme to regularly educate the workforce about the status of RTE species is in place. Appropriate disciplinary measures are taken and documented in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect, trade, possess or kill these species.</p> <p>- Minor compliance -</p>	<p>Brabanta has Security Guards and Forestry Service Agents to monitor HCVs and other areas meant to be protected.</p> <p>A monitoring programme is in place and daily reporting sheets have been prepared to capture field observations (e.g. number of trees cut, clearings sited, fires, location/site/estate/Block, number/surface area, person who committed the act, Village/Camp, Comments).</p> <p>Sensitization campaigns are held in Camps and communities on RTE and HCV.</p> <p>Several reports for the year 2020 were made available at the time of the audit. However, no reports for the 2021 were reviewed during the time of the audit.</p>	OFI

		Additionally, the sheet does not include capture, harm, posses, and/or killings of RTE as identified in HVC assessment. This is raised as an OFI to monitor progress made in the next audit	
7.12.7	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. - Minor compliance -	Brabanta carries out monitoring activities in all identified HCVs including RTEs. An HCV monitoring team has been put in place, and they carry out daily monitoring actions and report on daily, weekly, monthly and annual basis. According the team, the monitoring activities are reviewed on regular basis depending on the outcome of field activities and the management plan is updated accordingly.	Complied
7.12.8	<b>(C)</b> Where there has been land clearing without prior HCV assessment since November 2005, or without prior HCV-HCSA assessment since 15 November 2018, the Remediation and Compensation Procedure (RaCP) applies. - Critical (Major) compliance -	Brabanta has not undertaken any new land clearing since 2005 except for Savannah, Lumbundji which have been exclude for the scope of this audit.	Not Applicable

**Appendix B: GHG Reporting Executive Summary**

The GHG emissions that were produced in 2020 for Brabanta SA POM and supply base was calculated using the Palm GHG Calculator version 4. The assessment team had verified the data input in the Palm GHG Calculator against operations records. Palm GHG 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 and FFB Processed
- iv. Fertilizer consumed data for both estates and smallholders.

The summary of the Net GHG emitted in 2020 for Brabanta SA POM and supply base are as following:

Emission per product	tCO <sub>2</sub> e/tProduct
CPO	-0.35
PKO	0

Extraction	%
OER	24.50
KER	0

Production	t/yr
FFB Process	81,629.52
CPO Produced	20,438
PKO Produced	

Land Use	Ha
OP Planted Area	6184.58
OP Planted on peat	0
Conservation (forested)	713
Conservation (non-forested)	1,457.42
<b>Total</b>	<b>8,355</b>

**Summary of Field Emission and Sink**

	Own Crop*		Group		3 <sup>rd</sup> Party		Total	
	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB	tCO <sub>2</sub> e	tCO <sub>2</sub> e / FFB
<b>Emission</b>								
Land Conversion	52,529.43	0.64	0	0	0	0	52,529.43	0.64
CO <sub>2</sub> Emission from fertilizer	0	0	0	0	0	0	0	0
NO <sub>2</sub> Emission	0	0	0	0	0	0	0	0
Fuel Consumption	3,086.89	0.04	0	0	0	0	3,086.89	0.04
Peat Oxidation	0	0	0	0	0	0	0	0
<b>Sink</b>								
Crop Sequestration	-57,898.40	-0.71	0	0	0	0	-57898.40	-0.71
Conservation Sequestration	-6,303.19	-0.08	0	0	0	0	-6303.19	-0.08
<b>Total</b>	<b>-8,585.26</b>	<b>-0.11</b>	0	0	0	0	<b>-8,585.26</b>	<b>-0.11</b>

\*Note: Includes both estates and smallholders

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**Summary of Mill Emission and Credit**

	tCO <sub>2</sub> e	tCO <sub>2</sub> e/tFFB
<b>Emission</b>		
POME	0	0
Fuel Consumption	1,438.99	0.02
Grid Electricity Utilization	0	0
<b>Credit</b>		
Export of Grid Electricity	0	0
Sales of PKS	0	0
Sales of EFB	0	0
<b>Total</b>	<b>1,438.99</b>	<b>0.02</b>

**Summary of Kernel Crusher Emission and Credit (N/A)**

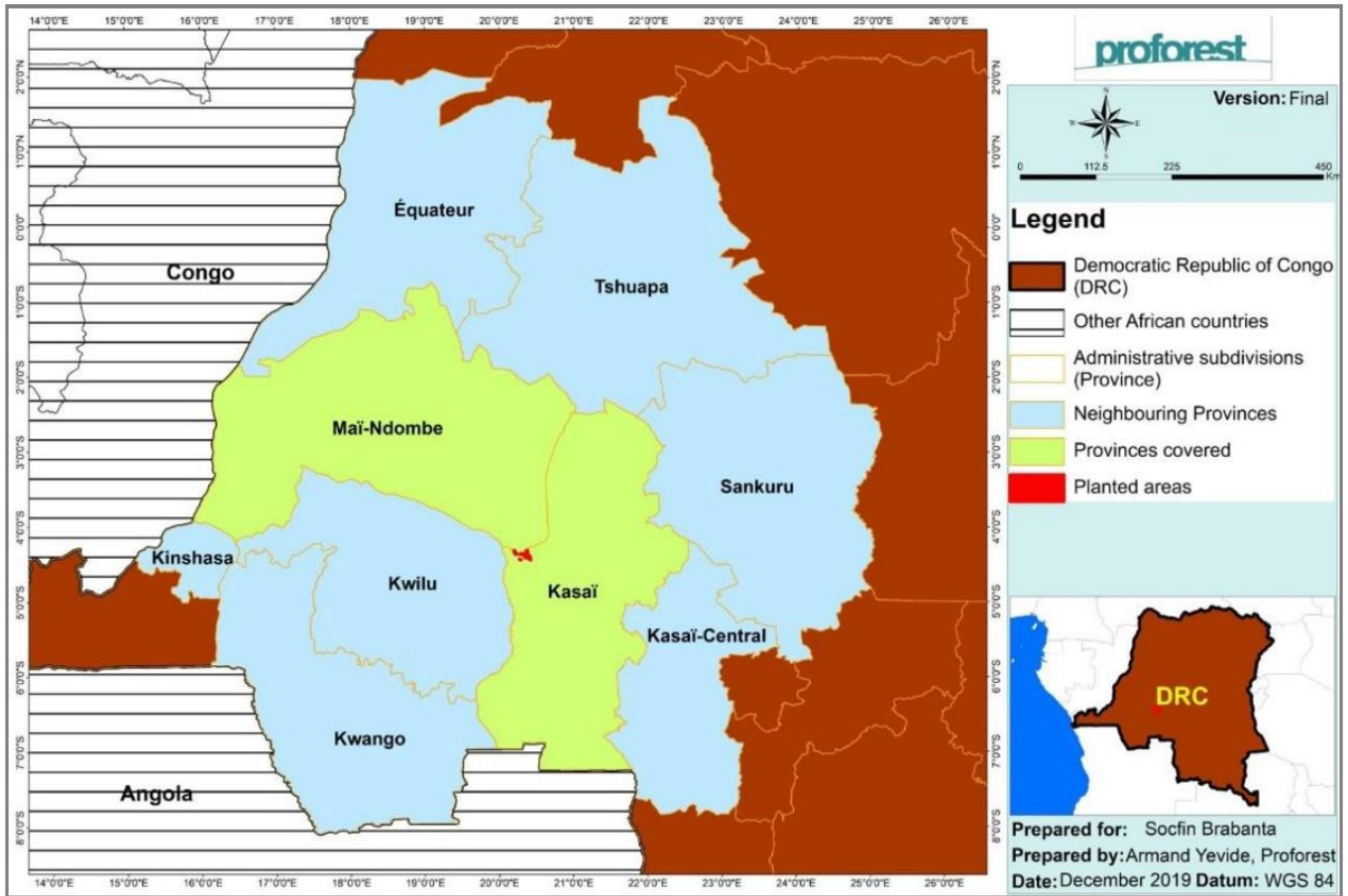
Emissions	tCO <sub>2</sub> e
PK from own mill	N/A
PK from other source	N/A
Fuel Consumptions	N/A
<b>Total Crusher emissions</b>	N/A

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

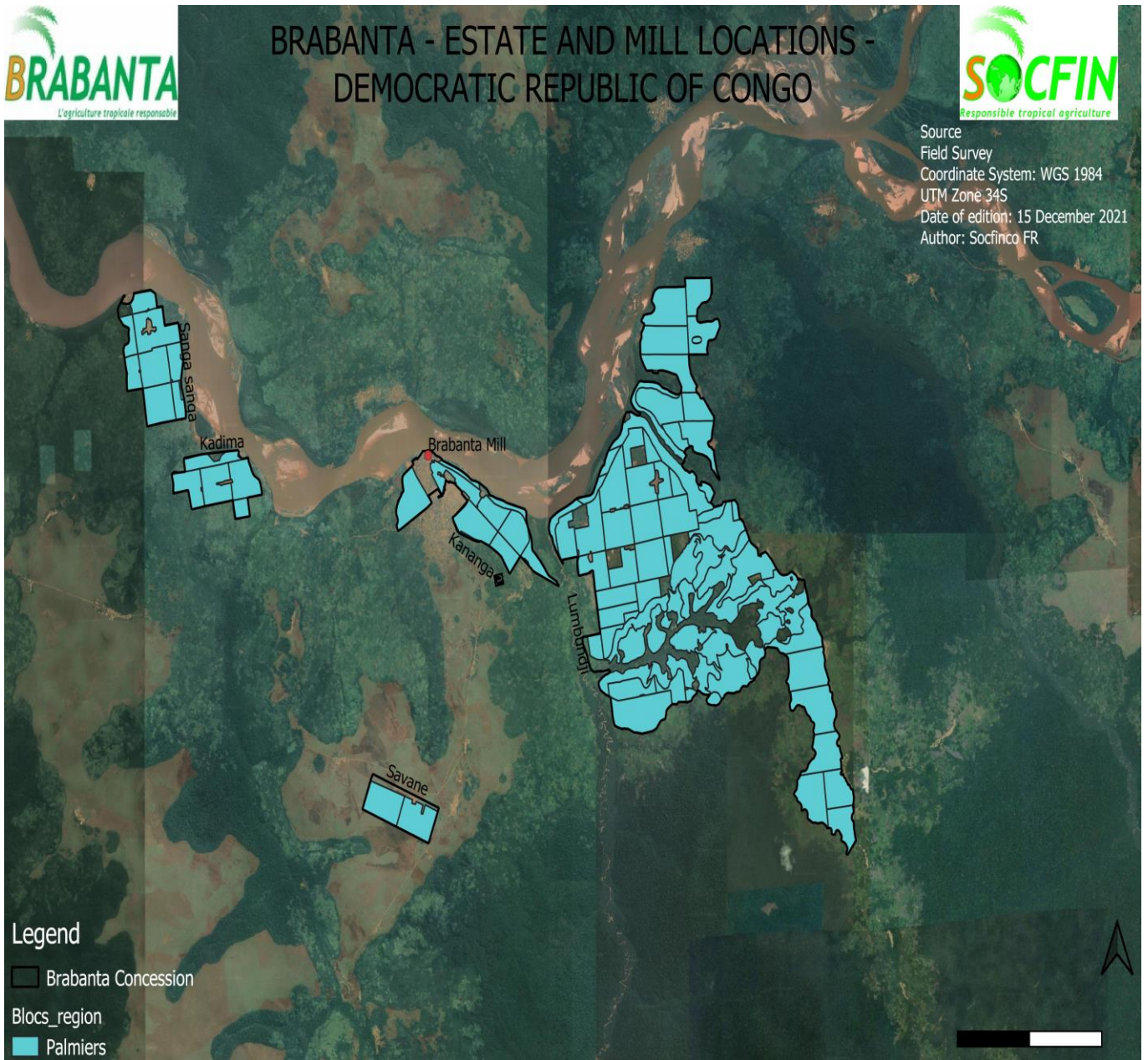
<b>POME Diverted to Anaerobic Digestion:</b>	
Divert to anaerobic pond (%)	0
Divert to methane captured (flaring) (%)	0
Divert to methane captured (energy generation) (%)	0



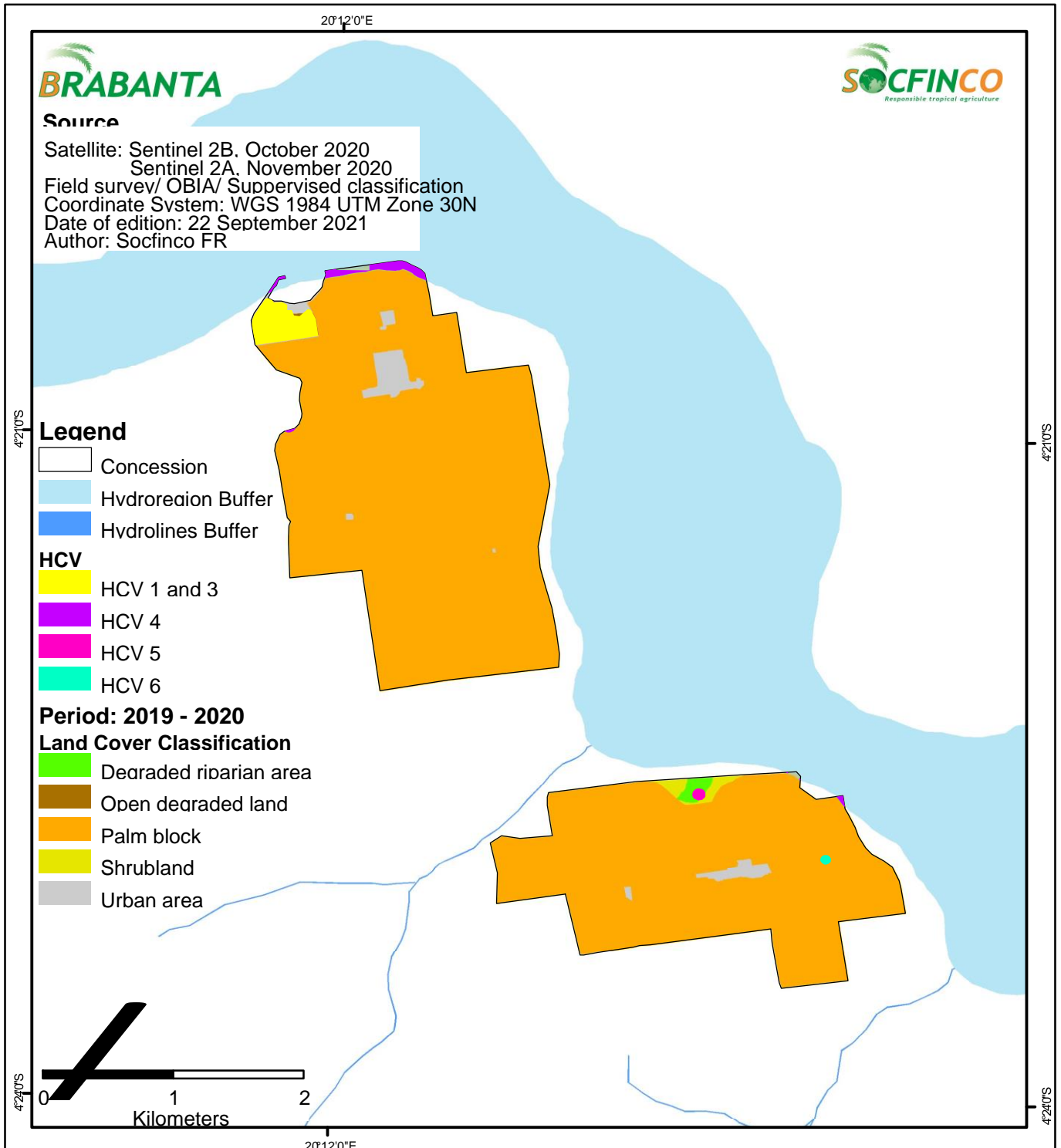
**Appendix C: Location Map of Certification Unit and Supply bases**



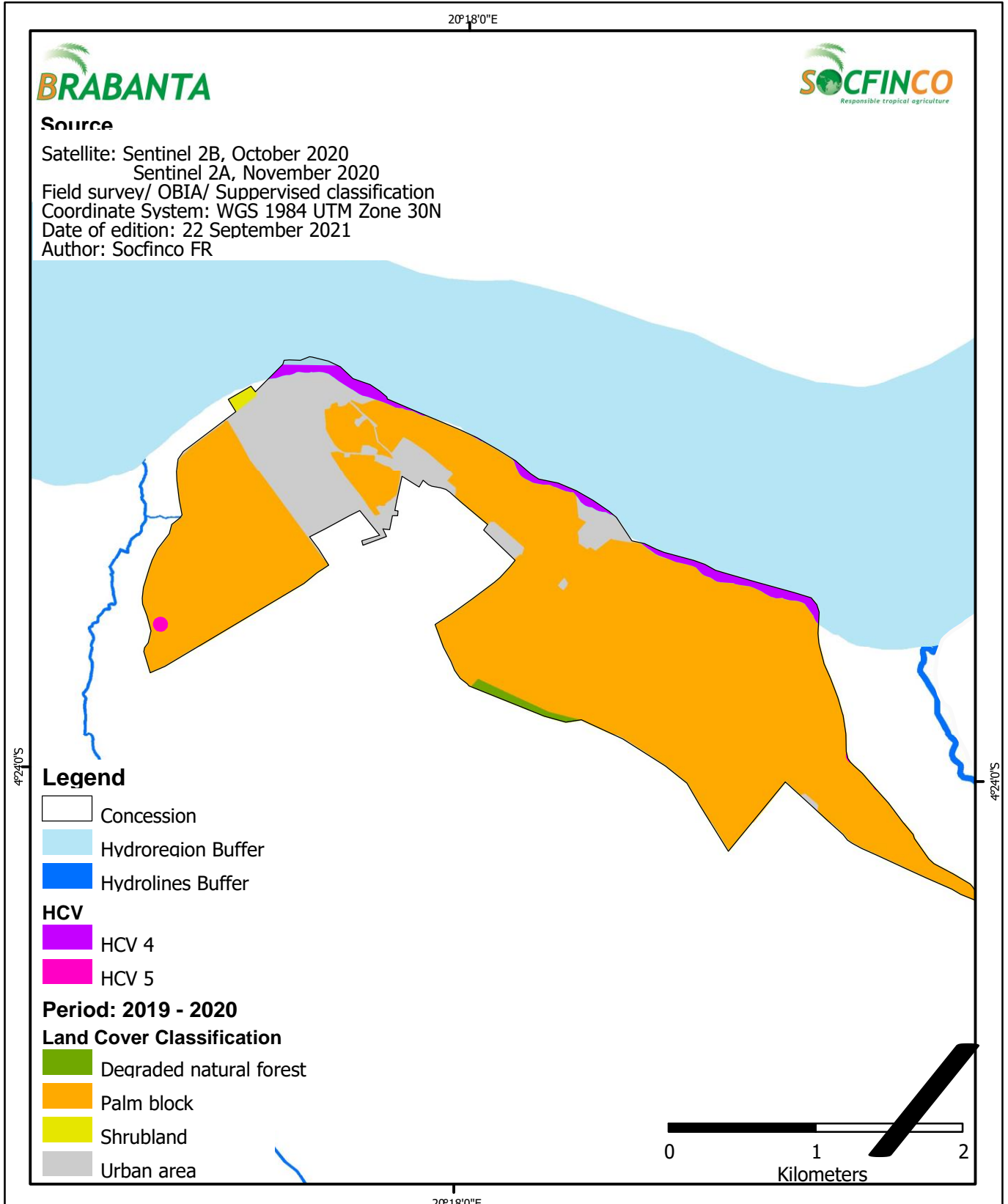
**Appendix D: Estate Field Map**



Brabanta-Land Cover – Democratic Republic of Congo  
 Sanga Sanga and Kadima: 2019 -2020



Kanangai: 2019 -2020





## 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
DRC	Democratic Republic of the Congo
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