

**RSPO PRINCIPLE AND CRITERIA
PUBLIC SUMMARY REPORT**

- Initial Assessment
- Annual Surveillance Assessment (4)
- Recertification Assessment (Choose an item.)
- Extension of Scope

Client Company (Parent Company): Olam International Limited
Client company Address: 9 Temasek Boulevard #11-02 Suntec Tower Two, Singapore
Certification Unit: Olam Palm Gabon SA – Bilala Palm Oil Mill
Location of Certification Unit: PK19 National Road N1, Mouila, Gabon
Date of Final Report: 30/05/2022

TABLE of CONTENTS	Page No
Section 1: Scope of the Assessment.....	3
1. Company Details	3
2. Certification Information	3
3. Other Certifications.....	4
4. Location(s) of Mill & Supply Bases	4
5. Description of Supply Base	4
6. Plantings & Cycle.....	5
7. Summary of Certified Tonnage of FFB (Own Certified Scope)	5
8. Summary of Certified Tonnage of FFB (from other certified unit(s))	5
9. Summary of Non-Certified Tonnage of FFB (outside supplier – excluded from certificate).....	6
10. Summary of Certified Tonnage (not applicable for ISS)	7
11. Summary of Actual Volume sold	7
12. Independent Smallholders Certified Tonnage / Volume	9
13. Independent Smallholders Actual Sold Tonnage / Volume	9
Section 2: Assessment Process	10
2.1 Assessment Methodology, Programme, Site Visits.....	10
2.2 BSI Assessment Team	11
2.3 Assessment Plan.....	13
Section 3: Assessment Findings	17
3.1 Multiple Management Units and Time Bound Plan.....	17
3.2 Progress of scheme smallholders and/or outgrowers.....	18
3.3 Details of Nonconformities	21
3.3.1 Status of Nonconformities Previously Identified and Observations.....	25
3.3.2 Summary of the Nonconformities and Status	34
3.4 Stakeholders and previous land owner / user consultation.....	34
3.5 Impartiality and conflict of interest	37
Formal Signing-off of Assessment Conclusion and Recommendation	38
Appendix A: Summary of Findings	39
Appendix B: GHG Reporting Executive Summary	120
Appendix C: Location Map of Certification Unit and Supply bases.....	122
Appendix D: Estate Field Map.....	123
Appendix E: List of Smallholder Registered and sampled.....	125
Appendix F: List of Abbreviations.....	126

Section 1: Scope of the Assessment

1. Company Details			
Parent Company	Olam International Limited		
RSPO Membership Number	1-0114-12-000-00	Membership Approval Date	09/10/2006
Address	9, Temasek Boulevard, #11-02 Suntec Tower Two, Singapore		
Palm Oil Mill / Group Manager / Estate (Certification Unit)	Olam Palm Gabon SA – Bilala Palm Oil Mill		
Location / Address	PK19 National Road N1, Mouila, Gabon		
Website	http://olamgroup.com		
Management Representative	Mahamadou Dao (Sustainability Manager)	E-mail	mohamed.dao@olamnet.com
Telephone	+24106006178	Facsimile	+24106006178

2. Certification Information			
Certificate Number	RSPO 671034	Certificate Start Date	28/12/2017
Date of First Certification	28/12/2017	Certificate Expiry Date	27/12/2022
Scope of Certification	Production of Palm Oil and Palm Kernel		
Visit Objectives	<p>The objective of Olam Palm Gabon ASA 4 was to;</p> <ul style="list-style-type: none"> • Confirm that the elements of the proposed scope of registration and the management system are conforming to the requirements of the assessment standard. • To confirm that the organization has effectively implemented and addressed the management system. • To confirm the ability of the management system is able to meet applicable statutory and regulatory, contractual requirements, organization policies and wherever are applicable. • To identify areas for potential improvement of the management system(s). 		
Assessment Cycle	<input type="checkbox"/> Pre Assessment (Choose an item.) <input type="checkbox"/> Initial Assessment <input checked="" type="checkbox"/> Annual Surveillance Assessment (ASA 4) <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 type="checkbox"/> Choose an item. <input checked="" type="checkbox"/> Gabon National Interpretation 2020 for RSPO P&C 2018 for the Production of Sustainable Palm Oil		

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

Supply Chain Module	<input type="checkbox"/> Identity Preserved; <input checked="" type="checkbox"/> Mass Balance	Mill Capacity	90MT/HR
ISH certification Phase	<input type="checkbox"/> Eligibility <input type="checkbox"/> Milestone A <input type="checkbox"/> Milestone B <input checked="" type="checkbox"/> Not Applicable		

3. Other Certifications			
Certificate Number	Standard(s)	Certificate Issued by	Expiry Date
EU-ISCC-Cert-DE11924207028	ISCC EU	ASG Cert	26/06/2022

4. Location(s) of Mill & Supply Bases			
Name (Mill / Supply Base / Group Manager / Smallholders)	Location	GPS Coordinates	
		Latitude	Longitude
Olam Palm Gabon SA-Bilala POM	Lot 1 Mboukou Bilala, National Road N1, Mouila, Gabon	1° 39' 07.76" S	10° 51' 16.30" E
Estate 1 (Lot 1 Plantation)	Mouila Lot 1 Estate and Infrastructure Map	1° 46' 37.30" S	10° 57' 43.80" E
Estate 2 (Lot 1 Plantation)	Mouila Lot 1 Estate and Infrastructure Map	1° 41' 25.70" S	10° 51' 20.20" E
Estate 3 (Lot 1 Plantation)	Mouila Lot 1 Estate and Infrastructure Map	1° 39' 07.75" S	10° 51' 16.30" E
Estate 4 (Lot 1 Plantation)	Mouila Lot 1 Estate and Infrastructure Map	1° 39' 29.80" S	10° 49' 53.50" E
Estate 5 (Lot 1 Plantation)	Mouila Lot 1 Estate and Infrastructure Map	1° 38' 13.20" S	10° 47' 24.10" E
Estate 6 (Lot 1 Plantation)	Mouila Lot 1 Estate and Infrastructure Map	1° 37' 55.30" S	10° 51' 29.00" E
Estate 7 (Lot 2 Plantation)	Mouila Lot 2 Estate and Infrastructure Map	1° 39' 00.94" S	10° 26' 26.24" E
Estate 8 (Lot 2 Plantation)	Mouila Lot 2 Estate and Infrastructure Map	1° 34' 21.69" S	10° 27' 48.48" E
Estate 9 (Lot 2 Plantation)	Mouila Lot 2 Estate and Infrastructure Map	1° 33' 04.60" S	10° 31' 22.63" 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
Mouila Lot 1 Plantation (Estate 1-6)	15,885	18,323	1,147	35,355	44.93%
Mouila Lot 2 Plantation (Estate 7-9)	9,060	21,543	1,197	31,800	28.49%
Total	24,945	39,866	2,344	67,155	37.15%

Note: *The Plantations (Lots) has been broken down into estates for ease of managements but are managed as a whole.

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

6. Plantings & Cycle							
Estate / Smallholders	Age (Years)					Mature	Immature
	0 - 3	4 - 10	11 - 20	21 - 25	26 - 30		
Mouila Lot 1 Plantation	-	15,885	-	-	-	15,885	-
Mouila Lot 2 Plantation	-	9,060	-	-	-	9,060	-
Total (ha)	-	24,945	-	-	-	24,945	-

7. Summary of Certified Tonnage of FFB (Own Certified Scope)				
Estate / Smallholders	Tonnage / year			
	Estimated last year (Dec 2020-Nov 2021)	Actual (Nov 2020-Oct 2021)		Forecast (Dec 2021-Nov 2022)
		Previous license period (Nov 2020)	Current license period (Dec 2020-Oct 2021)	
Mouila Lot 1	143,417	6,425.88	137,443.67	189,029.06
Mouila Lot 2	43,845	NA	27,443.70	66,741.20
Mouila Lot 3**	106,382	4,005.86	78,314.04	0
Total	293,644	10,431.74	243,201.41	255,770.26

Note: **Olam has moved Mouila Lot 3 as a supply base to the new Dola mill is audited as a separate certification unit. This was done after the ASA3 and that explains why some information on Lot 3 still appear in this reporting cycle

8. Summary of Certified Tonnage of FFB (from other certified unit(s))				
Estate / Smallholders	Tonnage / year			
	Estimated last year (Dec 2020-Nov 2021)	Actual (Nov 2020-Oct 2021)		Forecast (Dec 2021-Nov 2022)
		Previous license period (Nov 2020)	Current license period (Dec 2020-Oct 2021)	
N/A		N/A	N/A	
Total		N/A		

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

9. Summary of Non-Certified Tonnage of FFB (outside supplier – excluded from certificate)				
Out growers / smallholders	Tonnage / year			
	Estimated last year (Dec 2020-Nov 2021)	Actual (Nov 2020-Oct 2021)		Forecast (Dec 2021-Nov 2022)
		Previous license period (Nov 20)	Current license period (Dec 2020-Oct 2021)	
N/A	N/A	N/A	N/A	N/A
Total	N/A	N/A		N/A

9A. Monthly Records of Certified and Uncertified FFB Received since the last audit				
No.	Month - Year	Volume of FFB from certified supply base (mt)	Volume of FFB from uncertified supply base (mt)	Total FFB/Month (mt)
1	November 2020	10,431.74	-	10,431.74
2	December 2020	12,399.14	-	12,399.14
3	January 2021	18,907.71	-	18,907.71
4	February 2021	19,609.36	-	16,609.36
5	March 2021	27,074.78	-	27,074.78
6	November 2020	42,013.38	-	42,013.38
7	May 2021	28,838.57	-	28,838.57
8	June 2021	28,871.57	-	28,871.57
9	July 2021	26,516.08	-	26,516.08
10	August 2021	19,305.48	-	19,305.48
11	September 2021	10,908.31	-	10,908.31
12	October 2021	8,757.03	-	8,757.03
TOTAL		253,633.15	-	253,633.15

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

10. Summary of Certified Tonnage (not applicable for ISS)			
Estimated last year (Dec 2020-Nov 2021)	Actual (Nov 2020-Oct 2021)		Forecast (Dec 2021-Nov 2022)
	Previous license period (Nov 2020)	Current license period (Dec 2020-Oct 2021)	
FFB (Lot 1 + Lot 2 + Lot 3)	FFB		FFB (Lot 1 + Lot 2)
293,644 mt	10,431.74 mt	243,201.41 mt	255,770.26 mt
	253,633.15 mt		
CPO (OER: 24 %)	CPO (OER: 23.91%)		CPO (OER: 24%)
70,474 mt	2,494.23 mt	58,151.82 mt	61,384.86 mt
	60,646.05 mt		
PK (KER: 4.5%)	PK (KER: 4.03%)		PK (KER: 4.5%)
13,213.98 mt	420.40 mt	9,824.65 mt	11,509.66 mt
	10,245.05 mt		

10A. Monthly Records of Certified CPO & PK since the last audit			
No.	Month - Year	Certified CPO (mt)	Certified PK (mt)
1	November 2020	2,494.23	420.40
2	December 2020	3,045.02	521.87
3	January 2021	4,569.59	748.53
4	February 2021	4,817.27	788.78
5	March 2021	6,810.21	1,120.32
6	April 2021	8,917.38	1,551.55
7	May 2021	7,166.18	1,261.80
8	June 2021	6,974.25	1,196.23
9	July 2021	6,560.39	1,072.37
10	August 2021	4,638.73	781.94
11	September 2021	2,442.96	411.13
12	October 2021	2,209.84	370.53
	TOTAL	60,646.05	10,245.05

11. Summary of Actual Volume sold					
Current License period (Dec 2020-Oct 2021)					
	RSPO Certified	Other Schemes Certified		Conventional	Total
		ISCC	Others		

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

CPO (MT)	3,920.10	13,483.27	N/A	20,910.57	38,313.94
PK (MT)	10,245.05	N/A	N/A	0	10,245.05*
Credits	15,117	N/A	N/A	NA	15,117
Previous License period (Nov 2020)					
CPO (MT)	N/A	N/A	N/A	N/A	N/A
PK (MT)	N/A	N/A	N/A	N/A	N/A
Credits	N/A	N/A	N/A	N/A	N/A
Note: *All PK production goes directly to KCP to be processed.					

11A. Records of Certified CPO & PK Sold under PalmTrace since the last audit (if any)				
No.	Buyers Name	Palmtrace Trading License Number	Certified CPO Sold (mt)	Certified PK Sold (mt)
1	Cargill International Trading PTE Ltd	RSPO_PO1000000174	333.90	-
2	Louis Dreyfus Company Asia Pte Ltd	RSPO_PO1000001872	1,172.21	-
3	Louis Dreyfus Company Asia Pte Ltd	RSPO_PO1000001872	2,413.99	-
TOTAL			3,920.10	

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)
1	Cargill	ISCC	13,483.27	0
TOTAL			13,483.27	

11C. Records of CPO & PK Sold as conventional since the last audit (if any)				
No.	Buyers Name	CPO Sold (mt)	PK Sold (mt)	
1	Olam Lanbarene Refinery (Gabon)	12,429.57	-	
2	Cargill International	7,025.00	-	
3	Louis Dreyfus Company	966.00	-	
4	GICOG CONGO 3	194.00	-	
5	Navitrans	296.00	-	
TOTAL		20,910.57	0	

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)

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

1	ACT Commodities B.V	RSPO_PO1000008745	15,117.00
TOTAL			15,117.00

12. Independent Smallholders Certified Tonnage / Volume									
Phase	Estimated last year <i>(key in period)</i>			Actual <i>(key in period)</i>			Forecast <i>(key in period)</i>		
	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	

13. Independent Smallholders Actual Sold Tonnage / Volume						
	FFB	FFB Conventional	FFB Other schemes	IS-CSPO	IS-CSPK	IS-CSPKE
Current License period (<i>key in period</i>)						
Credits				N/A	N/A	N/A
Physical	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.
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Representative: Nicholas Cheong (Nicholas.Cheong@bsigroup.com)
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2.1 Assessment Methodology, Programme, Site Visits

The on-site assessment was conducted on 24th to 27th November 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.

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 visit was conducted off-site due to the NC only required document review.

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

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

Meetings were held with stakeholders to seek their views on the performance of 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.

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

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

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

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

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

Assessment Program					
Name (Mill / Supply Base)	Year 1 (Certification)	Year 2 (ASA 1)	Year 3 (ASA 2)	Year 4 (ASA 3)	Year 5 (ASA 4)
Bilala POM	√	√	√	√	√
Estate 1 (Lot 1 Plantation)				√	
Estate 2 (Lot 1 Plantation)		√		√	
Estate 3 (Lot 1 Plantation)				√	
Estate 4 (Lot 1 Plantation)	√				√
Estate 5 (Lot 1 Plantation)	√				√
Estate 6 (Lot 1 Plantation)			√		
Estate 7 (Lot 2 Plantation)		√			√
Estate 8 (Lot 2 Plantation)	√		√		
Estate 9 (Lot 2 Plantation)		√	√		

Tentative Date of Next Visit: November 23, 2022 - November 26, 2022

Total Number of Mandays: 16

2.2 BSI Assessment Team

Name	Role	Competency
Dennis Acquah (DA)	Team Leader	<p>Education: Holds a BSc. in Natural Resource management with specialization in Forestry from Kwame Nkrumah University of Science and technology, Kumasi, Ghana; MSc in logistic and Supply Chain Management from Kwame Nkrumah University of Science and technology, Kumasi, Ghana.</p> <p>Work Experience: 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>

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

		<p>Training attended: Successfully completed the RSPO P&C 2018 Lead Auditor Course; RSPO SCCS Lead Auditor Course, SA 8000, ISO 9001:2015, ISO 45001:2018, 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>Aspect covered in this audit: 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>Language proficiency: English</p>
<p>Aimé Fulgence (AFG)</p>	<p>Team Member</p>	<p>Education: He obtained qualification in Vocational Bachelor in Quality Control and Environment Management, ESTC, Abidjan (2018), Vocational training Certificate in cooperation, specialised in Cooperative management, Ecole Régionale d’Agriculture du Sud (ERA Sud Bingerville), Abidjan (2010), Marketing-Communication and Advertising Design Engineer, Institut des Technologies d’Abidjan (2009), Marketing-Communication and Advertising Techniques Engineer, Institut des Technologies d’Abidjan (2008), Bachelor of Arts in literature, specialised in English, Université de Cocody, Abidjan (2005), HND in Human Resources Management and Corporate Communication, ESSECT Henri Poincaré, Abidjan (2005), and Baccalauréat in Literature, Lycée Moderne d’Aboisso, Aboisso (2002).</p> <p>Work Experience: Has four years experience in social audit, sustainable agriculture, and certification of agricultural production systems.</p> <p>Training attended: Successfully completed the ISO 9001 Lead Auditor Course, Endorsed RSPO P&C Lead Auditor Course, Child Labor Centered Due Diligence Process / Abidjan, and Gender workshop for Associated trainers / Abidjan.</p> <p>Aspect covered in this audit: Policy and commitment, Social requirements, contract agreement, human rights, welfare, Stakeholder Consultation, Legal Requirements, land & Legal issue. Fluent in French and English.</p> <p>Language proficiency: Fluent in French and English</p>
<p>John Manyitabot Takang (JT)</p>	<p>Team Member</p>	<p>Education: Holds a Bsc. in Environmental and Resource Management and MSc. in Environmental Sciences from the University of Cologne, specializing in environmental law and governance.</p> <p>Work Experience: He was a Resident Scholar at the United Nations University’s International Human Dimensions Programme on Global Environmental Change (UNU-IHDP) in Bonn-Germany. John has also served at the International Forest Policy Unit, in the Department of Natural Resources Governance and Climate Change of the German Technical Cooperation (GIZ). He was the Academic</p>

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

		<p>Officer of the International Master of Environmental Sciences (IMES) Programme at the University of Cologne, where he equally taught classes in international environmental law. Additionally, he has taught classes in international environmental law in the Technology and Resources Management master study programme offered at the Institute for Technology and Resources Management in the Tropics and Subtropics of Cologne University of Applied Sciences. John is involved in a number of governance initiatives. Among others, he is a Fellow of the African Good Governance Network (AGGN). Since 2011, he is founding Executive Director of the Environmental Governance Institute (EGI), where he is engaging in the conception and implementation of a wide range of projects including, policy, development, renewable energies, sustainable agriculture among other.</p> <p>Training attended: Successfully completed the RSPO P&C 2018 Lead Auditor Course, ISO 14001:2015 Lead Auditor Course (attended), RSPO Smallholder Academy (Partner to the Academy) and training in HCV/HCS.</p> <p>Aspect covered in this audit: Best Management Practice for Mill and Estate, environment aspect, GHG & HCV, Fluent in English.</p> <p>Language proficiency: Fluent in French and English</p>
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Accompanying Persons:

Name	Role
Gueye Sarah MASSOLOU	Translator/Technical Expert
Valence Shem	Remote Observer
Muhammad Fadzli bin Masran	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	JT	AFG	SMG
Thursday 18/11/2021	All Day	Audit Team Arrives in Libreville/Under Quarantine	√	√	-	-
Friday 19/11/2021	All Day	Audit Team Under Quarantine	√	√	√	-
Saturday 20/11/2021	All Day	Audit Team Under Quarantine	√	√	√	-
Sunday 21/11/2021	All Day	Audit Team Under Quarantine	√	√	√	-
Monday 22/11/2021	All Day	Audit Team Under Quarantine	√	√	√	-

Date	Time	Subjects	DA	JT	AFG	SMG
Tuesday 23/11/2021	All Day	Audit Team Travel to Bilala site	√	√	√	√
DAY 1 Wednesday 24/11/2021	0800hrs To 0900hrs Main Office	Opening Meeting with Bilala Management Team and staff to include: Introductions, updates from Bilala Management; review audit scope, Finalise audit plan, Any introduction and updates to RSPO and BSI standards and protocols.	√	√	√	√
	0900hrs to 1200hrs Main Office	Document Review related to Legal compliance (2.1), Third party contractors legal (2.2), Third party FBB legally sourced (2.3), Long term plan and economic viability (3.1), Continuous Improvement & Reporting – RSPO Metrics (3.2), SOPs (3.3), Occupational Health and Safety Plan (3.6), Training (3.7), Supply Chain (3.8), Improved SH livelihoods (5.1), SH Pay and working conditions (5.2), Safe working environment 6.7,	√			√
	0900hrs to 1200hrs Main Office	Document Review related SEIA and Plans (3.4), Effective Integrated Pest Management (7.1), Pesticide Use (7.2), Waste management (7.3), Soil health fertility (7.4), Soil conservation (erosion and degradation) (7.5), Soil survey and topographic information (7.6), Peat (7.7), Water quality and quantity (7.8), Energy Use (7.9), Pollution and GHGs – Palm GHG (7.10) Fire (7.11), and HCV and HCS (7.12)		√		
	0900hrs to 1200hrs Main Office	Document Review related to Information and public availability, Communication and consultation (1.1), Commitment to ethical conduct (1.2), System for managing human resources (3.5), 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), 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,			√	
	1200hrs to 1330hrs	Lunch	√	√	√	√
	1330hrs	Document Review continues	√	√	√	√

RSPO P&C Public Summary Report

Revision 12 (Jun 2021)

Date	Time	Subjects	DA	JT	AFG	SMG
	To 1600hrs	Stakeholder consultations (To Be Confirmed)	✓		✓	✓
	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	✓	✓	✓	✓
DAY 2 Thursday 25/11/2021	0800hrs to 1200hrs Estate 1& 2	Field verification <ul style="list-style-type: none"> • Best agricultural practices • Manuring, Spraying, Harvesting • HCV / Conservation Area • Legal compliance / boundary • Chemical / Pesticide / PPEs, Pesticide and Fertilizer Stores /Change rooms • Workers interviews (including workers rights, issues, wages, conditions) 	✓	✓ ✓		✓ ✓
	1200hrs	Lunch				
	1330hrs to 1600hrs	Document Review Continues <ul style="list-style-type: none"> • Worker's facilities (housing, clinic, school etc) 			✓	
		Stakeholder consultations (To Be Confirmed)	✓		✓	✓
	1600hrs to 1630hrs	Audit Team Meets to consolidate day's findings	✓	✓	✓	✓
	1630hr to 1700hrs	Debriefing of days findings to Management and ends the day's work	✓	✓	✓	✓
DAY 3 Friday 26/11/2021	0800hrs to 1200hrs Estate 3	Field verification <ul style="list-style-type: none"> • Best agricultural practices • Manuring, Spraying, Harvesting • HCV / Conservation Area • Legal compliance / boundary • Chemical / Pesticide / PPEs, Pesticide and Fertilizer Stores /Change rooms Workers interviews (including worker's rights, issues, wages, conditions) 	✓	✓ ✓		✓ ✓
	1200hrs	Lunch				

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

Date	Time	Subjects	DA	JT	AFG	SMG
	1330hrs to 1600hrs	Document Review Continues <ul style="list-style-type: none"> Worker’s facilities (housing, clinic, school etc) Stakeholder consultations (To Be Confirmed)	√		√	√
	1600hrs to 1630hrs	Audit Team Meets to consolidate day’s findings	√	√	√	√
	1630hr to 1700hrs	Debriefing of days findings to Management and ends the day’s work	√	√	√	√
DAY 4 Saturday 27/11/2021	0800hrs to 1200hrs	Supply Chain for the POM (3.8) <ul style="list-style-type: none"> Demonstration of legal entity Roles and responsibility and ICS Procedures/manual/SOP Record of purchase – Record of sales– RSPO rules on market communication and claims 	√			√
	Mill	Mill Walk through and inspection: <ul style="list-style-type: none"> Workshops, Stores and POM application, Mill Safety and Health / PPE / Signage, Waste Management / Environment	√	√	√	√
	1200hrs	Lunch				
	1330hrs to 1500hrs	Closing Meeting Preparation: Auditors consolidate notes and confirm audit findings	√	√	√	√
	1500hrs to 1600hrs	Pre-Closing Meeting and Review of Findings: Convene with Management and Sustainability Team to discuss audit findings and potential non-conformities	√	√	√	√
	1600hrs to 1700hrs	Closing Meeting and End of Audit Convene with all relevant staff to summarize audit findings, potential non-conformities and next steps	√	√	√	√
Sunday 28/11/2021		Audit Team Travel to Mouila Lot 3	√	√	√	√

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?	Olam Palm Gabon has a Time Bound Plan and it includes all of its management units and mills.	Complied.
Have all the estates and mills certified within five (5) years after obtaining RSPO membership?	All units of OPG has been certified. The last on the plan is Graine (Ndende) which just went through its initial audit as indicated on the plan	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.	All units have been certified in line with the plan. Graine (Ndende) which is schedule for certification in 2021 has just conducted its initial audit.	Complied
Any deviations from the maximum periods requires approval by the RSPO Secretariat.	Review of the plan does not show any deviation as the estates and mills have been certified as scheduled.	Complied
Have there been any changes to the time-bound plan since the last audit (both new acquisition and existing)? If yes, justification is required. Is this consistent with the ACOP reporting?	There has not been any changes to the plan and this is consistent with the ACOP reporting 2020	Complied
Have there been any isolated lapses in implementation of the plan? If yes a Minor non-compliance shall be raised	No isolated lapses identified in the implementation of the plan	Complied
Have there been any fundamental failure (e.g. unable to justify delay in planning the assessments) to proceed with implementation of the plan? If yes a Major non-compliance shall be raised	No fundamental failures to implement the plan. The assessment are been carried out as planned	Complied
Un-Certified Units or Holdings		
No replacement of primary forest or any area required to maintain or enhance HCVs and HCS in accordance with RSPO P&C criterion 7.12.	All management units have fully gone through RSPO NPP and HCV assessments.	Complied
Any new plantings since January 1 st 2010 shall comply with the RSPO New Plantings Procedure.	All management units have completed and are fully complying to RSPO NPPs and completed public consultation, information is available on the RSPO NPP website and Olam website: Palm Plantations (olamgroup.com)	Complied
Any Land conflicts are being resolved through a mutually agreed process, such as RSPO Complaints System or Dispute Settlement Facility, in accordance with RSPO P&C criteria 4.4, 4.5, 4.6, 4.7 and 4.8.	No land dispute recorded at the time of the audit and also a review of the RSPO Tracker did not identify any liabilities	Complied

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

Any Labor disputes are being resolved through a mutually agreed process, in accordance with RSPO P&C criterion 4.2	No land dispute recorded at the time of the audit	Complied
Any Legal non-compliance is being addressed through measures consistent with the requirements of RSPO P&C criteria 2.1	There were no legal non-compliance at the time of the audit	Complied
Did the company conduct internal audit for those uncertified estates against the uncertified management units requirement and covering the RSPO P&C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12? If yes, a positive assurance statement shall be available and justified.	All other management units of Olam Palm Gabon were certified at the time of the audit as indicated in the TBP	Complied
Are there any Critical (Major) non-compliance raised against any of the RSPO P&C criterion 2.1 4.2, 4.4, 4.5, 4.6, 4.7, 4.8 and 7.12 during the last internal audit of the uncertified estates? If yes is the NC(s) actively addressed with RSPO?	All other management units of Olam Palm Gabon were certified at the time of the audit as indicated in the TBP	Complied
Have there been any stakeholder (including NGO) consultation conducted?	Stakeholders were consulted during the HCV assessment and also during this ASA 4 audit	Complied

3.2 Progress of scheme smallholders and/or outgrowers

Progress of scheme smallholders or outgrowers towards compliance with relevant standards		
Requirement	Remarks	Compliance
Has 100% of scheme smallholders and/or scheme outgrowers comply with the standard within three years of the mill's initial certification? 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.	There are no scheme smallholders in OPG operations	Complied

Approved Time Bound Plan

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

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

	RSPO initial certification									July 19		
	RSPO surveillance audit											
Mouila LOT 2	NPP notification			Dec 13								
	RSPO initial certification										Dec 20	
	RSPO surveillance audit											
GRAINE (NDENDE)	SOTRADER joined RSPO					July 15						
	NPP notification						June 16					
	RSPO independent gap assessment							Dec 17				
	RSPO initial certification											Dec 21
	100% certification of GRAINE Palm SH											Dec 21

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 One (1) Critical; Two (2) Minor nonconformities and four (4) Opportunity For Improvement raised. The Olam Palm Gabon SA-Bilala 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 Nonconformity(ies) has been verified for its effectiveness and closed accordingly. The below is the summary of the non-conformity raised during this assessment.

Non-conformity			
NCR Ref #	2137549-202111-M1	Date Issued	27/11/2021
Due Date	27/02/2022	Date of nonconformity Closure	27/12/2021
Clause & Category (Critical / Minor)	3.8.12 Critical		
Statement of Nonconformity:	Inconsistencies in the calculation of the mass balance report		
Requirement Reference:	Record keeping For Mass Balance Module, the mill: a. Shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis and / or three-monthly basis. b. All volumes of certified CPO and PK that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO. 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.		
Objective Evidence:	The company maintains a mass balance report in which records of production of FFB and sales of certified and conventional products are recorded. Review of the document shows inconsistencies in the production figures based on the formula applied and also some of the sales figures could not be accounted for.		
Corrections:	Revise and update the Mass Balance sheet		
Root Cause Analysis:	Information sharing process/system between key actors of the supply chain records is not effective. Currently, after any sales, sale department use to send a notification mail to the respective Mill/KCP Manager informing on the type and quantity of product sold and then the Mill Manager in turn must inform the Assistant. This information sharing process/channel does not include some key actors in charge of the supply chain implementation especially Mass Balance recorders which increase the risk to not capture all sale information.		
Corrective Actions:	1. From now on, all relevant actors in charge of traceability records including Mass Balance recorder, must be copied to the sale notification mails and weekly/monthly palm product report as well 2. Monthly check of the Mass Balance sheet by the Senior Mill Assistant		

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

Assessment Conclusion:	<p>OPG-Bilala POM presented a revised Mass Balance Production Report to the audit team. A review of the report has detailed information on the quantity of FFB processed from each estate every month and the quantity of CPO, PK and PKO produced each month. The report reviewed shows the average OER and KER over the licensed period to be 24% and 4,05% respectively. The report also provides information on sales made for certified CPO and PKO over the year under review. An analysis on the production with the extraction rate and the sales were found to be accurate.</p> <p>Based on the information provided, the NC is duly closed.</p>
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Non-conformity			
NCR Ref #	2137549-202111-N1	Date Issued	27/11/2021
Due Date	27/11/2022	Date of nonconformity Closure	Next assessment
Clause & Category (Critical / Minor)	1.1.5 Minor		
Statement of Nonconformity:	Contacts for some stakeholders in the list were not updated		
Requirement Reference:	There is a current list of contact and details of stakeholders and their nominated representatives		
Objective Evidence:	The company maintains a list of their stakeholders which was made available to the audit team for review. However, some of the email addresses provided on the list could not be reached when mails were sent to them.		
Corrections:	<ol style="list-style-type: none"> 1. Remove email address from their contact since not used to contact them 2. Check and update the stakeholder's list : <ul style="list-style-type: none"> ➤ Number of Contractors ➤ Name of their company ➤ Phone number 		
Root Cause Analysis:	OPG Mouila Lot 1 and 2 maintain the stakeholders list including their contact address (email and phone number) but the channel used by Olam to communicate with them is only through physical document (letters & others) and phone communication. The email address provided by them have never been checked by Olam and never been used to communicate with them. That is the reason the incorrect email address have not been identified		
Corrective Actions:	<ol style="list-style-type: none"> 1. Regular check and update (phone number and name of the representative) of stakeholder's list 2. The date of update must be mentioned into the list 3. All incorrect phone number must be notified to the contractor through an official requesting an immediate correction 		
Assessment Conclusion:	The corrective action plan has been reviewed and accepted. Effectiveness of corrective action taken will be further verified in the next assessment		

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

Non-conformity			
NCR Ref #	2137549-202111-N2	Date Issued	27/11/2021
Due Date	27/11/2022	Date of nonconformity Closure	Next assessment
Clause & Category (Critical / Minor)	3.1.3 Minor		
Statement of Nonconformity:	Information provided in the management review report was not complete		
Requirement Reference:	The unit of certification holds management reviews at planned intervals appropriate to the scale and nature of the activities undertaken		
Objective Evidence:	The company hold management review meetings ones every year. The minutes of meeting for the management review for the year was made available to the audit team. Review of the report shows the requirements as identified in the indicator were addressed. However, there was no information on the Status of preventive and corrective actions		
Corrections:	Revise the management review report to include the discussion and agreed decision on the status of preventive and corrective actions		
Root Cause Analysis:	OPG Lot 1 & Lot 2 conducted a management review and discussed all the relevant points as per the standard requirements but during the report drafting, no mention on the discussion regarding the status of Preventive & Corrective action. That happened because no review system in place.		
Corrective Actions:	In the future, the process of the management review report will be done in 2 steps to make sure all aspects have been captured into the report: 1. First step : Drafting 2. Second step: Review		
Assessment Conclusion:	The corrective action plan has been reviewed and accepted. Effectiveness of corrective action taken will be further verified in the next assessment		

Opportunity for Improvements	
OFI #	Description
OFI 1	<p>Indicator 3.4.3 The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way.</p> <p>Details: The company's Social and Environmental Management Plan (SEMP) ought to be reviewed in 2020. However, due to Covid restrictions, they could not carry out consultations with communities concerned. Review process has begun, where communities have been consulted, ask social department for progress achieved: meeting reports, attendance sheets, correspondences, etc. By the time of this audit, they had carried out a number of actions geared at reviewing the Social and Environmental Management Plan (SEMP).</p>

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

	<p>Bilala annual monitoring report of the SEMP was seen during the audit (Rapport de Progres du PGES (Anne 2020), Olam Palm Gabon (OPG), Plantation de Mouila Lot 1. Dated January 2021). Additionally, at the request of Olam, the Directorate of Environment and Sustainable Development (DGPEN), conducted a monitoring of the implementation of Olam’s SEMP between 16-25 October 2021. Interviews with the Regional Director of Ngounie Province confirmed this and the report of the monitoring mission was seen at the time of the audit. These actions are concrete steps that will permit the Directorate of the Environment to finalise the review of OPG’s SEMP. Notwithstanding these actions, the SEMP is yet to be fully reviewed hence an OFI is raised for further monitoring.</p>
<p>OFI 2</p>	<p>Indicator 6.7.3</p> <p>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>Details:</p> <p>The company has made available sanitation rooms where pesticide sprayers can change out of their PPEs. However, there is only one room shared by both the male and female pesticide applicators. Interview with the workers indicates the male stay out whiles the women change into their clothes and after which the men move in to change. This is raised as an OFI for the company to work on providing a separate changing rooms for both men and female.</p>
<p>OFI 3</p>	<p>Indicator 7.3.2</p> <p>Proper disposal of waste material, according to procedures that are fully understood by workers and managers, is demonstrated.</p> <p>Details:</p> <p>Bilala has put in place a system for collecting household waste consisting of collection bins with different colours: Red for glass, Blue for plastic waste and Green for biodegradable waste in line with the company's procedure for managing waste. However, the procedure doesn't seem to be fully implemented by workers. At the clinic, we found biodegradable waste mixed with paper/cartons in the blue waste collection bin that is designated for biodegradable. Additionally, at the residential area, we found that waste is not segregated according to the bins</p>
<p>OFI 4</p>	<p>Indicator 7.8.1</p> <p>A water management plan is in place and implemented to promote more efficient use and continued availability of water sources and to avoid negative impacts on other users in the catchment. The plan addresses the following:</p> <p>7.8.1a The unit of certification does not restrict access to clean water or contribute to pollution of water used by communities.</p> <p>7.8.1b Workers have adequate access to clean water</p> <p>Details:</p> <p>Bilala workers have adequate access to clean water. To ensure good quality water, analysis of water for consumption in housing units is done on a monthly basis. Analysis of water for consumption are conducted by Olam Lebamba Analytical Services Laboratory. Reports of water analysis up to the month of October 2021 were reviewed during the audit. However, it was observed that turbidity for the months from August to October were above limits. An observation is raised to follow-up.</p>

Positive Findings	
PF #	Description
PF 1	Management commitment to the certification process is commendable
PF 2	Proper organization of document and files

3.3.1 Status of Nonconformities Previously Identified and Observations

Non-conformity			
NCR Ref #	2019872-202011-M1	Date Issued	01/12/2020
Due Date	28/02/2021	Date of nonconformity Closure	04/02/2021
Clause & Category (Critical / Minor)	Indicator 6.7.3 Critical		
Statement of Nonconformity:	Supply and validity of PPEs not effectively checked		
Requirement Reference:	Workers use appropriate personal protective equipment (PPE), which is provided free of charge to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, land preparation, and harvesting. Sanitation facilities for those applying pesticides are available, so that workers can change out of PPE, wash and put on their personal clothing.		
Objective Evidence:	Some respirators used by pesticide applicators were found with expired cartridges (Filters) since 2015 and 2019. These were evident in estate 9 block O11 and estate 6 block K30. PF441 RSPO P&C Public Summary Report Revision 11 (Sept 2020) Page 24 of 176 Additionally, visit to the loading ramp in Lot3 found the workers with no Anti-Fall and Safety Harness as identified as PPEs to be used in the risk assessment document.		
Corrections:	Socialization of OPG’s risk assessment, PPE requirement according to operation activities to relevant PIC.		
Root Cause Analysis:	There is a restructuring of Sustainable Development (SD) function in May 2020, and health/ medical and safety division are integrated as part of the SD function with appointment of PIC for safety leader, PPE and storage assistant etc. There is lack of diligent monitoring by appointed PIC.		
Corrective Actions:	<ol style="list-style-type: none"> 1) Conduct briefing on OPG’s risk assessment, PPE requirement to appointed PIC on PPE and storage by safety division head for all sites (Lot 1, 2, 3) and supported by the head of health and safety department. 2) Provide one off report of expiry date for current PPE (i.e. cartridge) in stock and implement a procedure to manage the expiry dates of all PPE 3) Provide a report of the availability of anti-fall harness for all loading ramps. (Lot 1, 2, 3). 4) Communicate to all spraying team on the process to replace expired cartridge for all sites (Lot 1, 2, 3). 5) Provide training to loading ramp workers on proper use of PPE at Lot 3 		

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

Assessment Conclusion:	<p>Major NC close out of verification conducted on 3rd and 4th Feb. 2021. Olam has subsequently trained all sprayers in the Lot 1,2 and 3 on;</p> <ol style="list-style-type: none"> 1. The dangers of using expired PPE 2. How to check for expired date of PPEs especially on the cartridge. <p>Both training were conducted on 20/01/2021. In all 59 sprayers trained as sighted on the attendance sheet. Additionally the stores department has taken out all expired cartridges from the store and from the sprayers. Has furthermore developed a monitoring sheet of all items especially PPEs with their expiring dates to know when they will expired and to be replaced. The sheet which is captured Monitoring of Imported PPE was sighted. Review of the sheet did not established any expired PPE (Cartridge). Also cartridges in stock were found with expiring date of 2022/06 and 2023/01. A visit to estate 1, block 29 where spraying activity was ongoing did not come across any usage of expired cartridges as those in use has expiration date 2025/05. Interview with the workers also established the training received and could demonstrate where to check the validity of the cartridges from.</p> <p>Regarding the loading ramp, Olam, has conducted training for all staff at Lot2 loading ramp. The training was centered on the risk at the loading ramp and the importance of wearing the safety harness (anti-fall). The training attendance sheet sighted confirmed all 6 workers trained. A visited to estate 13 loading ramp and interview with the workers confirmed the training. Additionally workers were found wearing the safety harness (anti-fall) while offloading the FFBS onto the ramp.</p> <p>The onsite verification found the NC effectively addressed based on documented evidence and field interviews. Hence the NC is considered closed dated 04/02/2021 with continuous implementation to be further verified in the subsequent audit.</p>
ASA4 Verification	There was effective implementation of the corrective action plan as seen during the audit period. Thus, no recurrence of NC found.

Non-conformity			
NCR Ref #	2019872-202011-M2	Date Issued	01/12/2020
Due Date	28/02/2021	Date of nonconformity Closure	04/02/2021
Clause & Category (Critical / Minor)	Indicator 6.2.4 Critical		
Statement of Nonconformity:	Housing and sanitation conditions inadequate		
Requirement Reference:	The unit of certification provides housing, sanitation facilities, drinking water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. National laws, or in their absence the ILO Guidance on Workers' Housing Recommendation No. 115, are used. In the case of acquisitions of non-certified units, a plan is developed detailing the upgrade of infrastructure. A reasonable time (5 years) is allowed to upgrade the infrastructure.		

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

Objective Evidence:	<p>The unit of certification provides housing facilities for its workers distributed across several camps (Mbadi, Mboukou, PK19).</p> <p>The Company-wide agreement (Accord d’Etablissement, in Article 22.2.1 (a)) provides that workers who live with their families (i.e. spouse/partner and children) in the housing on the plantation will have a standard housing unit of 2 rooms.</p> <p>However, this provision is not respected by Olam in the attribution of housing units. A visit to the Mboukou housing area (first Housing Block right after the Clinic and directly next to where trucks, tractors and other vehicles are parked) in the 4th apartment, two families (husband, wife and 2 children) and (Husband, wife and 3 children) share the same apartment. This is same with the 3rd Housing Block from the clinic, where in apartment 7, (husband, wife and 1 kid) share an apartment with an unmarried man. The married couple actually has 3 kids but had only bring only one kid to live with them because of only a single has been allocated to the couple.</p> <p>Similarly, in Mbadi it was established that apartment S1 houses 7 persons (contract workers from J Stephane Services) and apartment S4 houses 9 persons (contract workers from Ngounie Transport Services).</p> <p>Additionally, water supply in some of the houses were frequently interrupted sometimes for more than 2 days (e.g. Blocks P, Q, T, U, V, P in Mbadi Housing Facilities). Meanwhile in Mandji, the Block that houses the Kindergarten and the Block directly behind do not have constant water supply.</p> <p>Also, workers at Lot 1 landfill site revealed that they trek up to 1.5 km in and out of their work station (i.e. 3km daily). It was also established that they have not been adequately sensitized to use the sanitation facility to wash down after work.</p>
Corrections:	<p>Reinforce housing agreement (Housing Occupation Agreement) to all administration department and reallocate housing according to the agreement. Make arrangement to distribute water into all houses.</p> <p>Socialization of health and safety procedures to workers at landfill site and continue to monitor compliance during weekly monitoring by Safety Division.</p>
Root Cause Analysis:	<p>Housing agreement and SOP is in place but not respected by contractors. They bring others members of families and friends without Olam knowledge. As per the policy, contractors who are accommodated are only those who are bachelors and they are supposed to be maximum 4 per house which means, 2 per room.</p> <p>Malfunction of booster pump causes low water pressure and distribution disruption.</p> <p>Workers at landfill site are unaware of the importance of sanitation after work.</p>
Corrective Actions:	<ol style="list-style-type: none"> 1) Conduct a population census for all current housing in Mboukou and Mbadi complex. Follow the SOP and ensure the housing capacity limit is respected according to company policy. 2) Install booster pumps at Mbadi and Mandji complex and verify their effectiveness. 3) Conduct health and safety awareness briefings to workers at landfill site in Lot 1 and continue to monitor compliance on a weekly basis by health and safety division. Safety division and operation team must coordinate to arrange transportation for the landfill workers.
Assessment Conclusion:	<p>Major NC close out of verification conducted on 3rd and 4th Feb. 2021.</p>

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

	<p>Olam has subsequently relocated the families into a standard housing unit of 2 rooms. They maintained that, the company’s housing agreement for staff (Accord d’Etablissement, in Article 22.2.1 (a)) provides that workers who live with their families (i.e. spouse/partner and children) in the housing on the plantation will have a standard housing unit of 2 rooms. However, these workers did not mentioned their marital status of the time of employment, hence the estate department was not aware of their current status. A visit to the housing area and interview with the families confirmed the assertion and also confirmed the relocation into a standard housing unit of 2 rooms.</p> <p>On the part of the contract workers, Olam has carried out housing census on all housing onsite to establish who occupies them as well the number of occupants. The report captured Audit Housing Report-21 was sighted. Olam has also renewed and signed Housing Occupation Agreement with all the contract managers. The agreement mentioned that each apartment will house 6 contract workers with 3 to a room. The agreement which is dated 20/01/2021 and has been signed by 19 of the contract managers was sighted. A visit to Lot3 and Lot2 housing (block Y, Z and the KG block) which houses contractor worker of J.C Services, DIFOR and Sonixt established that 4 workers were currently occupying the apartment with 2 in each room. Interview with the occupant established that they have been briefed by the contract managers on the maximum number of occupant in the apartment.</p> <p>Also to improve on water access, Olam has put in place daily water supply schedule to ensure water get to homes on daily basis. Hence water is pumped daily between the hours of 5am – 7am, 12noon – 2pm and 6pm – 9pm. Interview with the occupants in the houses visited in Lot3 and Lot2 housing (block Y, Z and the KG block) confirmed to improvement in the water supply.</p> <p>However mentioned more can be done as in some days are without water. Olam mentioned they are still working on a system to boost the pressure of the pumping devise, but until that is done they have resolved to the daily water supply schedule.</p> <p>At Lot1 landfill, Olam has conducted training for all 5 workers at the landfill on the need to use the sanitary facility after close of work and provision of transport to convey them to and from work. Subsequently, Olam has made available 3 containers filled with water and soap to be used to wash down before leaving onsite. Also transportation is made available for the workers on daily basis. Interview with the workers confirmed.</p> <p>The onsite verification found the NC effectively addressed based on documented evidence and field interviews. Hence the NC is considered closed dated 04/02/2021 with continuous implementation to be further verified in the subsequent audit.</p>
ASA4 Verification	There was effective implementation of the corrective action plan as seen during the audit period. Thus, no recurrence of NC found.

Non-conformity			
NCR Ref #	2019872-202011-M3	Date Issued	01/12/2020
Due Date	28/02/2021	Date of nonconformity Closure	04/02/2021

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

Clause & Category (Critical / Minor)	Indicator 6.6.1 Critical
Statement of Nonconformity:	Passports of Indonesian Foreign Workers (IFW) are retained by Olam
Requirement Reference:	All work is voluntary and the following are prohibited: <ul style="list-style-type: none"> • Retention of identity documents or passports • Payment of recruitment fees Contract substitution involuntary overtime. • Lack of freedom of workers to resign • Penalty for termination of employment • Debt bondage • Withholding of wages - Critical (Major) compliance -
Objective Evidence:	According Olam’s Foreign Workers’ Recruitment Policy (SOP no. 12/SD-FWR (01)/0820), the Section on Management Commitment (Art.8), states that: Workers’ passport might be held by the management for safekeeping purpose. In such case, workers must sign a consent letter and passport must be returned to the workers upon request at any time. However, the passports of Indonesian Foreign Workers (IFW) are retained by Olam, and no real proof of consent was provided at the time of the audit. HR provided a list of just two IFWs (name, date of birth, Olam number, passport number and signature), it therefore remains unclear whether the IFWs actually gave their consent for the retention of their passports.
Corrections:	HR Department to maintain a list of current foreign workers and apply OPG’s foreign workers procedure (including protocol for passport retention).
Root Cause Analysis:	Restructuring of management representative and recruitment of foreign workers is assigned under HR Department. The whole procedure from recruitment to workers site transportation and passport keeping was previously managed by a management representative and supported by the Administrative Department.
Corrective Actions:	1) Provide a copy of a signed letter to all current foreign workers on passport retention due to safe keeping or application/ renewal of government work permits. 2) Workers should also be informed and must understand that they could retrieve their passport at any time according to the procedure.
Assessment Conclusion:	Major NC close out of verification conducted on 3 rd and 4 th Feb. 2021. Signed copies of the Section on Management Commitment (Art.8), of Olam’s Foreign Workers’ Recruitment Policy (SOP no. 12/SD-FWR (01)/0820) was sighted. Interview with some of the workers (Indonesia Foreign Workers) established, they agree to Olam holding their passport for the purpose of security and they have right to retrieve it any time they so wish with no hesitation. The onsite verification found the NC effectively addressed based on documented evidence and field interviews. Hence the NC is considered closed dated 04/02/2021 with continuous implementation to be further verified in the subsequent audit.
ASA4 Verification	There was effective implementation of the corrective action plan as seen during the audit period. Thus, no recurrence of NC found.

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

Non-conformity			
NCR Ref #	2019872-202011-M4	Date Issued	01/12/2020
Due Date	28/02/2021	Date of nonconformity Closure	04/02/2021
Clause & Category (Critical / Minor)	Indicator 7.2.7 Critical		
Statement of Nonconformity:	Pesticides are not storage in accordance with best practice.		
Requirement Reference:	Storage of all pesticides is in accordance with recognized best practices.		
Objective Evidence:	<p>Procedure of storage and handling of agrochemical products was available, Ref OPG-MLA-EHS-SOP-05 edited on 1st October 2013 and revised on 1st October 2017 Revision 2.</p> <p>However, although pesticides were well stored, a visit to lot 3 pesticide store found agent in-charge of the store keeping his personal clothes and drinking water inside the store with pesticides contrary to best practice.</p>		
Corrections:	Annual briefing to chemical storekeepers on OPG’s Procedure of storage and handling of agrochemical products.		
Root Cause Analysis:	Lack of awareness of storekeeper on OPG’s Procedure of storage and handling of agrochemical products and diligent monitoring by Health and Safety Division.		
Corrective Actions:	<ol style="list-style-type: none"> 1) Conduct briefing on OPG’s Procedure of storage and handling of agrochemical products in Lot 3. 2) Conduct an awareness briefing when a storekeeper is hired or replaced. Include annual awareness briefing to chemical storekeepers across all sites in the recurring Sustainability Development program. Continue to monitor compliance of all stores as part of the annual audit. 		
Assessment Conclusion:	<p>Major NC close out of verification conducted on 3rd and 4th Feb. 2021.</p> <p>Olam has conducted training for the agent in-charge on 03/12/2020 on the topic; Awareness about the storage conditions of the products in the pesticide store. Subsequently, the agent has been on the same day not to store any item apart from the pesticide in the store (especially cloths, PPEs, food, drinking water). A visit to the Lot3 pesticide store and interview with the agent confirmed the training. Furthermore there was no cloths, drinking or food found in the store. A separate room has been created outside the store to be used as office and also keep such items.</p> <p>The onsite verification found the NC effectively addressed based on documented evidence and field interviews. Hence the NC is considered closed dated 04/02/2021 with continuous implementation to be further verified in the subsequent audit.</p>		
ASA4 Verification	There was effective implementation of the corrective action plan as seen during the audit period. Thus, no recurrence of NC found.		

Non-conformity			
NCR Ref #	2019872-202011-N1	Date Issued	01/12/2020
Due Date	28/02/2021	Date of nonconformity Closure	04/02/2021
Clause & Category (Critical / Minor)	Indicator 6.7.2 Minor		
Statement of Nonconformity:	First aid equipment and accident records not fully implemented		
Requirement Reference:	Accident and emergency procedures are in place and instructions are clearly understood by all workers. Accident procedures are available in the appropriate language of the workforce. Assigned operatives trained in first aid are present in both field and other operations, and first aid equipment is available at worksites. Records of all accidents are kept and periodically reviewed.		
Objective Evidence:	OPG has distributed first aid kits to trained first aiders, however a visit to estate 14 block V103 found first aid box used by the pesticides applicators virtually empty. Also some accident records sighted were not fully completed with their immediate causes and action. Sample sighted include accident on employees with employment number; 029410 – 18/06/2020, 021654 - 02/04/2020, 037114 - 01/04/2020, 015808 - 01/04/2020, 047262 - 26/05/2020, 035234 - 27/05/2020, 015553 - 29/05/2020.		
Corrections:	Distribution of first aid kits to sites according to normal schedule is interrupted due to on-going strike in custom and goods procured is on hold. Lack of involvement of operations team and lack of monitoring of Health and Safety Division on distribution and replacement of first aid kits.		
Root Cause Analysis:	Distribution of first aid kits to sites according to normal schedule is interrupted due to on-going strike in custom and goods procured is on hold. Lack of involvement of operations team and lack of monitoring of Health and Safety Division on distribution and replacement of first aid kits.		
Corrective Actions:	<ol style="list-style-type: none"> 1) Distribute and replace first aid kits to trained first aiders and maintain record as per SOP. 2) Upon distribution and replacement of first aid kit each time, inform all trained first aiders on do and don't on keeping the kit e.g. do not keep medicine in the kit, process to replace used items in the kit. 3) Conduct regular checks by operation supervisors and random checks by Health and Safety Division as part of their weekly task on components of first aid kit in the field. 4) Include annual first aid training to identified field personnel into SD program. 5) Complete the accident reports by including the immediate causes 		
Assessment Conclusion:	Major NC close out of verification conducted on 3 rd and 4 th Feb. 2021. Olam has conducted First Aid training for the CDQ (Team Leader). The training was also done for another team leader who was on her annual leave and has not benefited from the 2020 refresher training. The training was conducted on 21/01/2021 with training material sighted. The training was conducted by the residence Doctor. Subsequently, signed sheet to signify distribution of a new first		

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

	<p>aid kit to both trainers was sighted. Interview with both team leaders confirmed the refresher training. Also review of their first aid kit established compliance.</p> <p>Regarding accident records, Olam has completed the forms with their immediate causes and action and explained they were oversight on the part of the team leader who are tasked to completed them. Sighted include employment number; 029410 – 18/06/2020, 021654 - 02/04/2020, 037114 - 01/04/2020, 015808 - 01/04/2020, 047262 - 26/05/2020, 035234 - 27/05/2020, 015553 - 29/05/2020 with all the immediate causes and action fully completed.</p> <p>Correction action plan is accepted. Effectiveness of corrective action taken will be further verified in the next assessment</p>
ASA4 Verification	There was effective implementation of the corrective action plan as seen during the audit period. Thus, no recurrence of NC found.

Opportunity for Improvements	
OFI #	Description
OFI 1	<p><u>Indicator 7.12.6</u> All rare, threatened or endangered (RTE) species are protected, whether or not they are identified in an HCV assessment.</p> <p>A programme to regularly educate the workforce about the status of RTE species is in place. Appropriate disciplinary measures are taken and documented in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect, trade, possess or kill these species.</p> <p>Details: OPG to intensify its HCV sensitization to the entire workforce on the need to maintain the HCVs especially RTEs.</p> <p>ASA4 Verification: There was no re-occurrence of the OFI during the onsite audit and evidence sighted was included in checklist.</p>
OFI 2	<p><u>Indicator 3.4.3</u> The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way.</p> <p>Details: OPG is yet to review the management and monitoring plans with the affected stakeholders sighting covid-19 restrictions as the reason the review is yet to be done.</p> <p>ASA4 Verification: There was no re-occurrence of the same issue during the onsite audit and evidence sighted was included in checklist.</p>

<p>OFI 3</p>	<p><u>Indicator 7.8.1</u> 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: a) The unit of certification does not restrict access to clean water or contribute to pollution of water used by communities. Workers have adequate access to clean water.</p> <p>Details: Olam conduct water analysis on all drinking water, however regular checks on the chlorine dosing pump to ensured that it functions correctly and pumping the right amount of chlorine for safe drinking water would be appropriate.</p> <p>ASA4 Verification: There was no re-occurrence of the same issue during the onsite audit and evidence sighted was included in checklist.</p>
<p>OFI 4</p>	<p><u>Indicator 7.8.3</u> 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>Details: Olam is yet to receive its POME analysis result conducted 29/06/2020. However previous analysis conducted 25/11/2019 showed BOD = 4800mg/l and COD = 6500mg/l. The BOD was found to be below the national parameter of 5000 mg/l. OPG is however not discharging the POME into the open environment i.e. water body or swamps but into the plantation as fertigation.</p> <p>ASA4 Verification: There was no re-occurrence of the OFI during the onsite audit and evidence sighted was included in checklist.</p>
<p>OFI 5</p>	<p><u>Indicator 4.4.6</u> There is evidence that implementation of agreements negotiated through FPIC is annually reviewed in consultation with affected parties.</p> <p>Details: OPG is yet to review its social contract with communities sighting covid-19 restrictions as the reason.</p> <p>ASA4 Verification: There was no re-occurrence of the OFI during the onsite audit and evidence sighted was included in checklist.</p>
<p>OFI 6</p>	<p><u>Indicator 1.1.4</u> Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by a nominated management official.</p> <p>Details: OPG could improve on its records of register for request and information given to all villages.</p>

	<p>ASA4 Verification: There was no re-occurrence of the OFI during the onsite audit and evidence sighted was included in checklist.</p>
OFI 7	<p>Indicator 6.2.5 The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food.</p> <p>Details: OPG could improve on transportation of contract workers in accessing food and other essentials outside the camp.</p> <p>ASA4 Verification: There was no re-occurrence of the OFI during the onsite audit and evidence sighted was included in checklist.</p>

3.3.2 Summary of the Nonconformities and Status

CAR Ref.	Category (Critical / Minor)	P&C Indicator	Issued Date	Status & Date (Closure)
2019872-202011M1	Critical	6.7.3	01/12/2020	Closed, 04/02/2021
2019872-202011M2	Critical	6.2.4	01/12/2020	Closed, 04/02/2021
2019872-202011M3	Critical	6.6.1	01/12/2020	Closed, 04/02/2021
2019872-202011M4	Critical	7.2.7	01/12/2020	Closed, 04/02/2021
2019872-202011NI	Minor	6.7.2	01/12/2020	Closed, 04/02/2021
2137549-202111-M1	Critical	3.8.12	27/11/2021	Closed, 27/12/2021
2137549-202111-N1	Minor	1.1.5	27/11/2021	Next assessment
2137549-202111-N2	Minor	3.1.3	27/11/2021	Next assessment

3.4 Stakeholders and previous land owner / user consultation

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

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

Structured worker interviews with male and female workers and staff were held in private at the workplace in the mill and the estates. Fieldworkers were interviewed informally in small groups in the field. In addition, the wives of

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

workers and staff were interviewed in informal group meetings at their housing. Separate visits were made to each of the local communities to meet with the village head and residents. Company officials were not present at any of the internal or external stakeholder interviews. A list of Stakeholders contacted is included as below.

Stakeholders contacted		
Type of Stakeholder (e.g. Internal, Union, Contractor, Governmental Department, NGO, External, Communities)	Stakeholder name / organization	Means of communication (e.g. face to face interview, email, phone interview, comment from public notice)
Internal	Workers Representatives	Face to face interviews
Internal	Gender Committee	Face to face interviews
Third party Contractors (Labour)	Agricole and Transport services	Face to face interviews
Governmental Department	Préfet Douya-Onoye (Mouila)	Face to face interviews
Governmental Department	DP Eaux ET Forêts	Face to face interviews
Communities	Guidouma, St. Martin, Mboukou, Doubou	Face to face interviews

Stakeholders comment	
Workers Representatives	<p>Feedbacks: They ensure the rights of workers are protected and also defend the interest of workers. Generally they have a cordial relationship with management of Olam Palm Gabon-Bilala POM. However, they raised some few issues of concern which they will like management to consider. They complained about the lack of an office for union activities. The continuous power outages affects their electrical appliances and they will like see Article 21 of the bargaining agreement between workers and management of OPG revised. They indicated that the agreement in its current form places more power in the hands on the supervisors who determines the promotion of workers.</p> <p>Audit Team verification and response: On the need for an office for union activities, management indicated that they have initiated an action through the civil engineer to renovate one of the offices for the union to be used as an office. On the issue of continuous light outs, management indicated that the company generates its own electricity and as such must find a way to save energy. They also indicated that such load shedding is limited to workers such as harvesters, loose fruit pickers and others who spend most of the time in the plantations. There is also a system where workers whose devices are damaged as a result of the load shedding to have their devices repaired by the company. On the need to have Article 21 revised, management indicated that this was discussed in their last meeting with the union and they have both agreed to deliberate more on it during their next meeting scheduled in December 2021.</p>
Gender Committee	<p>Feedbacks: There is a Gender Committee in place with a mandate and yearly program in place. Generally, they have no issue of concern.</p> <p>Audit Team verification and response: N/A</p>
Labour Contractors	<p>Feedbacks: They provide workers for field activities in the plantations such as pruning, harvesting, decreeping and many more. Generally they enjoy a good relationship with Olam Palm Gabon-Bilala POM. Their only concern has to do with the duration of the contract they have with the company. They claim</p>

	<p>the six months renewable contract duration they have with company is too short and must be extended to at least a year.</p> <p>Audit Team verification and response: Management responded that the six months contract duration helps the company to keep their labour contractors in check. The duration used to be a year, however the company realised the contractors takes advantage of the long duration to flout some of the company policies. It's for this reason that the company took the decision to reduce the duration to six and its renewable base on how the contractor complies with the policies of the company</p>
Préfet Douya-Onoye	<p>Feedbacks: They have no issues of concern</p> <p>Audit Team verification and response: N/A</p>
DP Eaux ET Forêts	<p>Feedbacks: They have no issues of concern</p> <p>Audit Team verification and response: N/A</p>
Guidouma	<p>Feedbacks: They have no issue of concern with the company. However, they will want the company to increase the social contributions in terms of job creation and employments.</p> <p>Audit Team verification and response: The company has an existing social agreement with the community which is been implemented.</p>
St. Martin	<p>Feedbacks: The only issue the community has with the company has to do with access to fishing areas within the company's operational areas. They complained that to access those areas, the communities are issued access cards. They believe the use of the cards are not needed as fishing areas were identified in a participatory manner between the community and the company.</p> <p>Audit Team verification and response: Interview with management on this issue established that, the carding system was introduced to prevent intrusion by people from other communities who have not been permitted to access those areas.</p>
Mboukou	<p>Feedbacks: Generally, they have a cordial relationship with the company. However, they will want the company to contribute more to the recruitment of youth from the community.</p> <p>Audit Team verification and response: Management indicated the company has a recruitment policy based on which all workers of the company are selected. Further engagements revealed that several natives of the community are already working in the company.</p>
Doubou	<p>Feedbacks: The community indicated the company has legally acquired land for their operations through negotiations and agreements with the government of Gabon and as such there are no disputes on the land. There exist a social agreement between the company and the Doubou community towards social development. However, the community will want the agreement revised to enable the company make more contribution to the economic development of the community. These they</p>

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

	<p>suggest to include recruitment of more of the community youth to reduce unemployment and poverty among the youth. They will also like the company to fix all the faulty solar panels in the communities.</p>
	<p>Audit Team verification and response: Interview with the management of OPG indicates management has already initiated a discussion on the subject with community and based on the discussion, they have come up with a social policy to address the needs of the community.</p>

List of land owner / user contacted					
Name	Years of ownership / used	Land area (ha)	Agreement (Yes / No)	Agreement base on FPIC (Yes/No)	Compliance on the agreement terms and conditions
OPG-Bilala POM (Lot 1)	2011	35,355	Yes	No	Compliance
OPG-Bilala POM (Lot 2)	2012	31,800	Yes	No	Compliance



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

3.5 Impartiality and conflict of interest

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

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 Olam Palm Gabon-Bilala Palm Oil Mill has complied with the Gabon National Interpretation 2019 of the RSPO P&C 201 and audit criteria identified within the audit report. It is deemed that the management system has achieved its intended outcomes. Therefore, it is recommended that Olam Palm Gabon-Bilala Palm Oil Mill is remain certified.

Report prepared by	Acceptance of Assessment Conclusion
Name: Dennis Acquah	Name: MAHAMADOU DAO
Company Name: BSI	Company Name: OLAM PALM GABON
Title: Lead Auditor	Title: Head of Certification
Signature: 	Signature: <i>(I the undersigned, being the most senior relevant management representative of the operation seeking or holding certification, agree with the contents of this report and accept the liability in execution of the procedure in the report.)</i> 
Date: 25/01/2022	Date: 25/01/2022

Appendix A: Summary of Findings

Criterion / Indicator	Assessment Findings	Compliance	
Principle 1: Behave ethically and transparently			
Criterion 1.1: The unit of certification provides adequate information to relevant stakeholders on environmental, social and legal issues relevant to RSPO Criteria, in appropriate languages and forms to allow for effective participation in decision making.			
1.1.1	<p>(C) Management documents that are specified in the RSPO P&C are made publicly available.</p> <p>- Critical (Major) compliance -</p>	<p>Olam Palm Gabon-Bilala POM has a list of management document that they make publicly available. The document are made publicly available through display on notice boards in and around the company and also on the company website Ethics & Compliance (olamgroup.com). The company has also shared copies of all such documents with the communities through their chiefs and representatives. Interview with community leaders all confirmed receipt of the company documents. The documents include:</p> <ol style="list-style-type: none"> 1. Policy for the protection of reproduction rights 2. Policy on sexual harassment and other forms of harassment 3. Policy on child labor 4. Human rights policy 5. Policy of freedom of association and collective bargaining 6. Special labor policy 7. Ethics policy 8. Whistleblower policy 9. HSE policy 10. Policy on equal opportunities in employment 11. Policy on forced labor and trafficking, contract substitution and immigrant and temporary workers 	Complied

Criterion / Indicator		Assessment Findings	Compliance
		12. The participatory mapping procedure 13. The procedure for handling external complaints 14. Protection policy for protected areas; 15. The procedure for the management of areas with High Conservation Values 16. The communication and consultation procedure A visit to the company's notice board showed all the documents been displayed.	
1.1.2	Information is provided in appropriate languages and accessible to relevant stakeholders. - Minor compliance -	The official written and spoken language in Gabon is French and as such all their information are documented in French and shared with all relevant stakeholders. Interview with the Human Resource manager indicates the laws of Gabon does not permit the use of any other language be it foreign or local dialect to be used as any means of communication or for training other than the French language. OPG to ensure their workers are abreast with all needed information and communication, organizes introductory French lesson for all their workers for a year. A sample of workers interviewed in the field during the audit period confirmed they are introduced to French lesson for a year	Complied
1.1.3	(C) Records of requests for information and responses are maintained. - Critical (Major) compliance -	Reviewed a procedure (SOP N ° 005 / CRS DI (4) / 0120 Revision 04 of 17 th January 2020 to allow any interested person to make a request for information. Review of the procedure shows request for information can be made at two level. At the internal level which allows workers to request for information and at the external level where external stakeholders can request for information. All request made are recorded in a register which is signed by both parties.	Complied

Criterion / Indicator		Assessment Findings	Compliance
1.1.4	<p>(C) Consultation and communication procedures are documented, disclosed, implemented, made available, and explained to all relevant stakeholders by a nominated management official.</p> <p>- Critical (Major) compliance -</p>	<p>The company has a documented consultation procedure and dated 07/02/2012 in place. Review of minutes of meetings with attendance shows the company has explain the procedure to the communities.</p> <p>Also during the community consultations, communities confirmed the procedure has been explained to them and they were able to identify Ms. Nina Kouabahangoue as the management nominated person who explained the procedure and all other company documents to them.</p>	Complied
1.1.5	<p>There is a current list of contact and details of stakeholders and their nominated representatives.</p> <p>- Minor compliance -</p>	<p>The company maintains a list of their stakeholders which was made available to the audit team for review. The list of stakeholder include Government Agencies, Workers Representatives, NGO's, gender Committee Service Providers and many more. Some of the stakeholders were selected for interview.</p> <p>However, some of the email addresses provided on the list could not be reached when mails were sent to them.</p>	Non-compliance
<p>Criterion 1.2: The unit of certification commits to ethical conduct in all business operations and transactions.</p>			
1.2.1	<p>A policy for ethical conduct is in place and implemented in all business operations and transactions, including recruitment and contracts.</p> <p>- Minor compliance -</p>	<p>OPG-Bilala has a documented code of ethics in place and has been communicated to all relevant stakeholders. The document is communicated through the following channels:</p> <ol style="list-style-type: none"> 1. during induction for new employees 2. displays on the company's notice boards 3. during their morning muster <p>Copies of the ethical conduct has also been shared with communities and business partners as confirmed during the stakeholder interviews</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance
1.2.2	A system is in place to monitor compliance and the implementation of the policy and overall ethical business practice. - Minor compliance -	The company implements the policy through internal regulations that defines and monitors the actions of workers. The company also conducts monthly internal assessment to check compliance to the country's laws and internal policies. To monitor compliance to the ethical policy by workers, the company through the human resource department conducts internal audits on daily basis. The assessment also covers compliance by the third party contractors to ethical policy.	Complied
Principle 2: Operate legally and respect rights			
Criterion 2.1: There is compliance with all applicable local, national and ratified international laws and regulations.			
2.1.1	(C) The unit of certification complies with the applicable legal and regulatory requirements. - Critical (Major) compliance -	The company has a documented legal registry captioned "List of Laws and Applicable Conventions referenced N°01/LEG LIST/0621 and dated 06/06/2021. The list is made up of 118 local laws and 57 applicable international conventions. Sampled evidence of compliance by the company to the legal requirements are 1. In compliance to the country's Environmental Legislation, the company for an establishment of its irrigation project has conducted a Social and Environmental Impact Assessment (SEIA) and in line with the government directive has been issued a Certificate of Compliance with Number 001568/MEFMEPCPAT/SG/DGEPN. 2. Evidence of compliance to the payment of social security. Payment as by the laws of Gabon is done quarterly. a. Reference 21DS000081728 Date of Payment: 26/04/2021 Period: First Trimester	Complied

Criterion / Indicator		Assessment Findings	Compliance
		<p>Company ID: 001-0175470-W Olam Palm Gabon Amount paid: 549,923,985 Gabonese Franc</p> <p>b. Reference 21Q0000080203 Date of Payment: 28/07/2021 Period: Second Trimester Company ID: 001-0175470-W Olam Palm Gabon Amount paid: 639715687 Gabonese Franc</p> <p>c. Reference 21Q00000827738 Date of Payment: 28/10/2021 Period: Third Trimester Company ID: 001-0175470-W Olam Palm Gabon Amount paid: 578374532 Gabonese Franc</p>	
2.1.2	<p>A documented system for ensuring legal compliance is in place. This system has a means to track changes to the laws and regulations in force, including listing and evidence of legal due diligence of all contracted third parties, recruitment agencies, service providers and labour contractors.</p> <p>- Minor compliance -</p>	<p>The company conducts yearly internal legal compliance assessment on both their 3rd party contractors and on the different department of the company to ensure legal compliance is in place. The company has not yet conducted their legal compliance assessment for the 2021 year during the time of this audit because the scheduled date is from 20th -31st December 2021.</p> <p>However, the audit team reviewed sample reports for the 2020-year assessment report.</p> <p>To track changes in the laws the company has subscribed to the country's Official Journal. This is a government owned news outlet that publishes changes in the law as well as the passage of new laws. The company receives changes or amendment to the laws</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance
		through mails with the news outlets. The last communication between the company and the news outlet was mail available to the audit team for review. In the mail communication the company through the company lawyer has received copies of newsletter for the months of September and October.	
2.1.3	Legal or authorised boundaries are clearly demarcated and visibly maintained, and there is no planting beyond these legal or authorised boundaries. - Minor compliance -	The company has defined their legal boundaries through the establishment of boundary pillars. In all there are 5 pillars used to define the boundary of the company's operational area. Field visit to sampled pillars were identified and their GPS coordinates was taken. Z94 (A) 1°49'20"S 10°58'23"E W83 (B) 1°47'37"S 10°56'14"E During the field visit it was observed that the company has not planted beyond their boundaries	Complied
Criterion 2.2: All contractors providing operational services and supplying labour, and Fresh Fruit Bunch (FFB) suppliers, comply with legal requirements.			
2.2.1	A list of contracted parties is maintained. - Minor compliance -	The company maintains a list of all their contracted parties. The list is made up of 26 contracted parties and depending on the kind of services they provide, they are categorised into Agricole activities (six) and Agricole and transport activities (20). Some of the contracted parties on the list are Espace Vert Service, ETS Ouedraogo and Sim Service Gabon. The audit team reviewed their contract documents and all were found to be valid.	Complied
2.2.2	All contracts, including those for FFB supply, contain specific clauses on meeting applicable legal requirements, and this can be demonstrated by the third party. - Minor compliance -	Reviewed contract of agreement between Dirane Gamnjie Ngala Service (DGNS), Espace Vert Service and Olam Palm Gabon for field maintenance and also between Okola Transport service and Olam Palm Gabon for the transportation of workers and FFB. All contracts contain clauses on meeting applicable legal requirements.	Complied

Criterion / Indicator	Assessment Findings	Compliance
	<p>The audit team reviewed their business registration permit and annual license payment and all were found to be compliant. Evidence of compliance to the payment of social security. Payment as by the laws of Gabon is done quarterly:</p> <ul style="list-style-type: none"> a. Espace Vert Service Reference 21DS000096038 Date of Payment: 13/10/2021 Period: Third Trimester Company ID:040-0209684-T Amount paid: 399,600 Gabonese Franc b. Societe Agricole Et Prestation Au Gabon (SAPGA) Reference 2IDS000099726 Date of Payment: 29/10/2021 Period: Third Trimester Company ID: 004-0183887-0 Amount paid: 15,083,292 Gabonese Franc c. Societe LA Semence Du Gabon Reference 21DS000099542 Date of Payment: 29/10/2021 Period: Third Trimester Company ID: 004-0200066-V Amount paid: 454,966 Gabonese Franc 	

Criterion / Indicator		Assessment Findings	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>Reviewed contract of agreement between Dirane Gamnjie Ngala Service (DGNS), Espace –vert Service and Olam Palm Gabon for field maintenance and also between Okola Transport service and Olam Palm Gabon for the transportation of workers and FFB. All contracts contain clauses on disallowing child, forced and trafficked labour.</p> <p>The company does not employ young workers in their operations.</p>	Complied
<p>Criterion 2.3: All FFB supplies from outside the unit of certification are from legal sources.</p>			
2.3.1	<p>(C) For all directly sourced FFB, the mill requires:</p> <ul style="list-style-type: none"> Information on geo-location of FFB origins Proof of the ownership status or the right/claim to the land by the grower/smallholder Where applicable, valid commercial license, or is part of a cooperative which allows the buying and selling of FFB. <p>PROCEDURAL NOTE: The proof of the status or the right of ownership can be considered at first by the departmental exploitation contract. See decree N° 01497 of December 29, 2011, or the document of the ANUTTC.</p> <p>- Critical (Major) compliance -</p>	<p>The company source all its FFB directly from their estates. Information of the geo-location of the estate has been provided in the mill details of the report and proof of legal rights to use land is captured in indicator 4.4.1</p>	Complied
2.3.2	<p>For all indirectly sourced FFB, the unit of certification obtains from the collection centres, agents or other intermediaries, the evidence as listed in Indicator 2.3.1. PROCEDURAL NOTE: For Implementation Procedure for 2.3.2 refer to Annex 4.</p> <p>- Minor compliance -</p>	N/A, as stated above	Not Applicable
<p>Principle 3: Optimise productivity, efficiency, positive impacts and resilience</p>			

Criterion / Indicator		Assessment Findings	Compliance
Criterion 3.1: There is an implemented management plan that aims to achieve long-term economic and financial viability.			
3.1.1	<p>(C) A business or management plan (minimum three years) is documented that includes, where applicable, a jointly developed business case for Scheme Smallholders.</p> <p>- Critical (Major) compliance -</p>	<p>Olam Palm Gabon Mouila Plantation (Mouila Bilala Palm Oil Mill and supply bases) has established and implemented its commitment to long term sustainability and improvements through a capital expenditure programme. A Budget and 7 years' management plan (projections 2017- 2024) was verified during the audit. Mouila Bilala Palm Oil Mill and supply base has made progress towards achieving their performance production targets for the current financial year. OPG has gazetted long range business plan (OPEX and CAPEX: FY2019 - FY2041) for all Concessions including Mouila Plantation. The projection covers FFB forecast, extraction rate (OER & KER), direct cost (upkeep, fertilizer, R&D, mechanization, upkeep tools, harvesting, mill processing and overhead - manager & staff emolument) and in-direct cost (corporate allocation). The company does not have Scheme Smallholders in their operations.</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 company did the first planting in 2013-2015 and has no plans of replanting until the next 25 years or more.</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 company conducts management reviews ones every year as indicated in the company's procedure for Internal Audits and Management Review contained in the Supply chain and Traceability Procedure dated 01/10/2021. The company has had its management review for the year under audit. Copy of the minutes of meeting was made available to the audit team for review.</p> <p>1. Minutes of Management Review Meeting RSPO P n C Mouila Lot 1 and Lot 2 Date: 28/10/2021</p>	Non-compliance

Criterion / Indicator		Assessment Findings	Compliance
		<p>Attendance:</p> <p>Review of the management review report confirmed all the requirement as identified in the indicator were addressed. However, there was no information on the Status of preventive and corrective actions</p>	
<p>Criterion 3.2: The unit of Certification regularly monitors and reviews their economic, social and environmental performance and develops and implements action plans that allow demonstrable Continuous improvement in key operations.</p>			
3.2.1	<p>(C) The action plan for continuous improvement is implemented, based on consideration of the main social and environmental impacts and opportunities of the unit of certification.</p> <p>- Critical (Major) compliance -</p>	<p>The company has an action plan for continuous improvement last revised in April 2019. Review of the plan has detailed information on all the requirement at mentioned in the indicator. Some of the action implemented to Optimise the yield of the supply base include</p> <ul style="list-style-type: none"> a. POME land application which started in 2019 b. Optimisation of the palm yield through irrigation was started on a pilot stage in 2017 on a 126ha irrigated research plot. 	Complied
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>The company has filled and submitted the metric template. All information provide has been verified by the audit team. The template was completed by the sustainability manager</p>	Complied
<p>Criterion 3.3: Operating procedures are Appropriately documented, consistently implemented and monitored.</p>			
3.3.1	<p>(C) Standard Operating Procedures (SOPs) for the unit of certification are in place.</p> <p>- Critical (Major) compliance -</p>	<p>The company has SOPs for both the Mill and the Estates. Reviewed sampled SOPs for the estate and they include</p> <ul style="list-style-type: none"> 1. Spraying procedures dated 2016 2. Harvesting Oil Palm Procedures dated 2016 	Complied

Criterion / Indicator		Assessment Findings	Compliance
		3. Manuring Procedure date 2016 4. Oil Palm Replanting 5. Oil Palm Fruit Grading The company also has documented SOPs for the mill. They include procedures for the FFB reception, Fruit Handling, Sterilization, Boiler Station, Water treatment.	
3.3.2	A mechanism to check consistent implementation of procedures is in place. - Minor Compliance -	The company has a documented procedure which guides the implementation of the SOPs captioned The SOPs for the Estate are been implemented through the agronomic team and the company conducts internal audits to monitor the consistent implementation of the SOPs.	Complied
3.3.3	Records of monitoring and any actions taken are maintained and available. - Minor Compliance -	The company undertakes daily internal audits to assess the effective implementation of the SOPs. Reviewed sampled internal audits reports for Harvesting, FFB Grading and Manuring audits for the year 2021. <ol style="list-style-type: none"> 1. Audit Report on Fertilizer Application Date: 24/09/2021 2. Daily Report on FFB Grading Date: 14/06/2021 3. Daily Report on Harvesting and Loose Fruit Collection Date: 10/06/2020. For all gaps identified during the assessment, the company takes actions to remedy the deviations. Records of actions taken are maintained and were made available to the audit team for review	Complied

Criterion / Indicator		Assessment Findings	Compliance
Criterion 3.4: A comprehensive Social and Environmental Impact Assessment (SEIA) is undertaken prior to new plantings or operations, and a social and environmental management and monitoring plan is implemented and regularly updated in ongoing operations.			
3.4.1	(C) In new plantings or operations including mills, an independent SEIA, undertaken through a participatory methodology involving the affected stakeholders, and including the impacts of any smallholder/ outgrower scheme is documented - Critical (Major) compliance -	Olam Palm Gabon commissioned an independent SEIA for their operations in Lot 1 (Rapport: Etude D'Impact Environmental Relative a l'Amenagement d'une Palmeraie dans la Zone de Mouila Lot 1). The assessment was conducted by Ecospehere and the final report was submitted in May 2012. The report was viewed during the time of the audit.	Complied
3.4.2	For the unit of certification, a SEIA is available and social and environmental management and monitoring plans have been developed with participation of affected stakeholders. - Minor Compliance -	Following the SEIA study cited in 3.4.1 above, a management and monitoring plan has been developed for Lot 1: Plan De Gestion Environnementale et Sociale, Implantation D'une Palmeaire Dans La Zones De Mouila (Lot1) (Environmental and Social Management Plan, Establishment of a Palm Grove in the Mouila Areas (Lot1), dated 2012.	Complied
3.4.3	(C) The social and environmental management and monitoring plan is implemented, reviewed and updated regularly in a participatory way. - Critical (Major) compliance -	In respect of Law No. 16/93 of 26/08/1993 establishing the Environmental Code of Gabon, OPG implements the management and monitoring plan and submits annual reports to the Department of Environment. OPG's Social and Environmental Management Plan (SEMP) ought to be reviewed in 2020. By the time of this audit, OPG had carried out a number of actions geared at reviewing the Social and Environmental Management Plan. OPG's annual monitoring report of the SEMP was seen during the audit (Rapport de Progres du PGES (Anne 2020), Olam Palm Gabon (OPG), Plantation de Mouila Lot 1. Dated January 2021). Additionally, at the request of Olam, the Directorate of Environment and Sustainable Development (DGPEN), conducted a	OFI

Criterion / Indicator		Assessment Findings	Compliance
		<p>monitoring of the implementation of Olam’s SEMP between 16-25 October 2021. Interviews with the Regional Director of Ngounie Province confirmed this and the report of the monitoring mission was seen at the time of the audit.</p> <p>These actions are concrete steps that will permit the Directorate of the Environment to finalise the review of OPG’s SEMP. Notwithstanding these actions, the SEMP is yet to fully reviewed hence an OFI is raised for further monitoring.</p>	
Criterion 3.5: A system for managing human resources is in place.			
3.5.1	<p>Employment procedures for recruitment, selection, hiring, promotion, retirement and termination are documented and made available to the workers and their representatives.</p> <p>- Minor Compliance -</p>	<p>The company has a documented procedure in place for recruitment, selection, hiring, promotion, retirement and termination. The document was made available to the audit team. A review of the procedure indicates recruitment starts with an internal advertisement through memos to inform departmental heads of the vacant position.</p> <p>If the company is unable to recruit internally, the position is placed on external advertisement. This involves recruitment from the neighbouring communities and outside communities.</p> <p>Selected applicants are shortlisted based on qualifications and are subjected to interviews and medical test. Review of some workers' files showed recruitment is consistent with the procedure.</p>	Complied
3.5.2	<p>Employment procedures are implemented, and records are maintained.</p> <p>- Minor Compliance -</p>	<p>Review of a sampled workers file confirmed the implementation of the company’s procedures. Records of job advertisement, applications received, interview of short listed applicants leading to job offers and contracts were made available to the audit for review</p>	Complied

Criterion / Indicator	Assessment Findings	Compliance	
Criterion 3.6: An occupational health and safety (H&S) plan is documented, effectively communicated and implemented.			
3.6.1	<p>(C) All operations are risk assessed to identify H&S issues. Mitigation plans and procedures are documented and implemented.</p> <p>- Critical (Major) compliance -</p>	<p>The company has risk assessed all the activities in their operations to include harvesting, nursery, chemical spraying among others. The assessment report is captioned "Register of the Risk Analysis About Health and Safety at Work" last revised 12/06/2020. Also the company has developed and documented mitigation plans to address all the risk identified in their operations. The report was updated to include the contamination of Covid-19 in the transportation of workers. The report as reviewed has information on the</p> <ol style="list-style-type: none"> 1. Major Activity/Area 2. Description of the activity 3. Danger 4. Risk Related to the danger 5. Risk evaluation 6. Level of Risk 7. Counter Measure 8. New Counter Measures. <p>The company base on the risk assessment conducted has also developed and documented different SOPs for the implementation of the plan. Some of the procedures reviewed include:</p> <ol style="list-style-type: none"> 1. Management of PPEs dated 01/03/2016 2. Disposal of Agro-Chemical containers dated 05/09/2017 3. Emergence Response for Agro-Chemical Products dated 01/10/2015 4. Spraying with Agro-Chemical Procedures date 01/10/2017. 	Complied

Criterion / Indicator	Assessment Findings	Compliance
	<p>The company has provided training on the various procedures to the workers. Sample training records reviewed include:</p> <ul style="list-style-type: none"> a. Topic: Mechanical Spraying Date: 12/05/2021 Attendance: 2 drivers b. Topic: Safe Handling of Pesticides Date: 09/03/2021 Attendance: 3 Sprayers c. Topic: Chemical Store Keepers Date: 01/10/2021 Attendance: 7 store keepers <p>Reviewed the company's PPEs distribution report captioned PPE Datasheet. The report has information on the worker, registration number, type of PPE, Activity and date of distribution. Some of the report made available for review are</p> <ul style="list-style-type: none"> 1. Activity: Spraying Date: 17/09/2021 Type of PPE: Boots Number Issued: 17 2. Activity: EFB Application Date: 15/09/2021 Type of PPE: Leather gloves Number Issued: 18 	

Criterion / Indicator		Assessment Findings	Compliance
3.6.2	<p>(C) The effectiveness of the H&S plan to address health and safety risks to people is monitored.</p> <p>- Critical (Major) compliance -</p>	<p>The company monitors the effectiveness of the health and safety plan to address health and safety risks to people through analysis of monthly accidents records. The company made available to the audit team for review an excel report captioned "Records of Accident on the Site of Olam Palm Gabon-2021". The report contains detailed records of all accidents recorded in the Bilala operational areas. The report which is recorded on monthly basis has information on the Name of Victim, Company Name, Job Description, Activity at the time of accident, Accident area, Date of accident, Date of Accident report, Nature of accident, Type of injury, Location of injury in the body, causes of accident, department number of lost time, type of accident. Based on the type of lost time accident recorded, the company using the Health and Safety plan conducts sensitization, awareness and training to workers to ensure similar accidents are avoided in the future. Record of training were made available to the audit team for review.</p> <ol style="list-style-type: none"> 1. Topic: Reminding Worker on the Working Instruction Date: 10/09/2021 Attendance:8 2. Topic: Sensitization of the drivers Date: 27/09/2021 Attendance:9 	Complied
<p>Criterion 3.7: All staff, workers, Scheme Smallholders, out-growers, and contract workers are appropriately trained.</p>			
3.7.1	<p>(C) A documented programme that provides training is in place, which is accessible to all staff, workers, Scheme Smallholders and outgrowers and</p>	<p>The company has a training programme for the mill captioned "Training Programme 2020-2021. The training covers all workers</p>	Complied

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

Criterion / Indicator	Assessment Findings	Compliance
<p>subcontractors, taking into account gender-specific needs, and which covers applicable aspects of the RSPO P&C, in a form they understand, and which includes assessments of training.</p> <p>- Critical (Major) compliance -</p>	<p>of both the mill and estate. Some of the training in the programme include</p> <ol style="list-style-type: none"> 1. Fire Drills Training 2. First Aid Training 3. Training on Safety <p>Records of training provided to the workers were made available to the audit team for review. They include</p> <ol style="list-style-type: none"> a. Topic: First Aid Training Date: 09/07/2021 Attendance: 13 workers b. Topic: Fire Drill Training Date: 08/07/2021 Attendance: 11 workers c. Topic: Chemical Spraying Date: 26/10/2021 Attendance: 10 workers d. Topic: Harvesting/Ripeness Standard/RSPO Date: 12/10/2021 Attendance: 36 Harvesters <p>Pictorial evidences of the fire drills were also made available for review.</p>	
<p>3.7.2 Records of training are maintained, where appropriate on an individual basis.</p> <p>- Minor Compliance -</p>	<p>As stated above</p>	<p>Complied</p>

Criterion / Indicator		Assessment Findings	Compliance
3.7.3	<p>Appropriate training is provided for personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard (SCCS). Training is specific and relevant to the task(s) performed.</p> <p>- Minor Compliance -</p>	<p>The company has identified the Mill manager, Senior Mill assistant, Mass balance recorder, Weighbridge operator and sales team as personnel carrying out the tasks critical to the effective implementation of the Supply Chain Certification Standard.</p> <p>The company provides training for all these persons based a training plan which is conducted once a year. Sample training records were made available for review.</p> <p>Topic: Supply Chain Lead Auditor training conducted from 18-19/10/2021 for 6 workers. Trainings were also provided on supply chain basic requirements on 22/10/2021 for mill manager.</p>	Complied
<p>Criterion 3.8: Supply chain requirement for mills (note: All supply chain requirements are considered as Critical (C). However it will not contribute to suspension if there is more than 5 non-compliance within a principle)</p>			
3.8.1	<p>Identity Preserved Module</p> <p>A mill is deemed to be Identity Preserved (IP) if the FFB processed by the mill are sourced from plantations/estates that are certified against the RSPO Principles and Criteria (RSPO P&C), or against the Group Certification scheme.</p> <p>Certification for CPO mills is necessary to verify the volumes and sources of certified FFB entering the mill, the implementation of any processing 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.</p>	N/A	Not Applicable
3.8.2	<p>Mass Balance Module</p> <p>A mill is deemed to be Mass Balance (MB) if the mill process FFB from both RSPO certified and uncertified plantations/estates. A mill may be taking delivery of FFB from uncertified growers, in addition to those from its own</p>	<p>The supply chain model been implemented by the company is the Mass Balance model. The company takes delivery of certified FFB from their certified estate in Mouila Lot 1 and 2 and uncertified FFB from their uncertified estate 16, 17 and 18 (Ndende)</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance
	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.		
3.8.3	The estimated tonnage of CPO and PK products that could potentially be produced by the certified mill shall be recorded by the certification body (CB) in the public summary of the P&C certification report. This figure represents the total volume of certified oil palm product (CPO and PK) that the certified mill is allowed to deliver in a year. The actual tonnage produced shall then be recorded in each subsequent annual surveillance report.	The company gave their projections as CPO-61,070.64MT PK-11,450.75MT	Complied
3.8.4	The mill shall also meet all registration and reporting requirements for the appropriate supply chain through the RSPO IT platform.	The company is registered on the Palmtrace with a Palmtrace account number RSPO_PO1000006576. Review of the palm trace shows three transactions has been made and duly reported.	Complied
3.8.5	<p>Documented procedures</p> <p>The mill shall have written procedures and/or work instructions or equivalent to ensure the implementation of all elements of the applicable supply chain model specified. This shall include at minimum the following:</p> <ul style="list-style-type: none"> a) Complete and up to date procedures covering the implementation of all the elements of the supply chain model requirements. b) Complete and up to date records and reports that demonstrate compliance with the supply chain model requirements (including training records). c) Identification of the role of the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements. This person shall be able to demonstrate awareness of the mill’s procedures for the implementation of this standard. 	<p>The company has documented a number of procedures to ensure effective implementation of their supply chain models. Reviewed documented procedures include:</p> <ol style="list-style-type: none"> 1. Supply chain and Traceability (Mass balance) 2. Internal Audit SOP 3. Transportation SOP <p>The site also keeps records and reports on supply chain activities. Some of the reports reviewed during the audit period include</p> <ul style="list-style-type: none"> Weigh bridge tickets Sales records Mass Balance records Training Records Palm Trace announcements 	Complied

Criterion / Indicator		Assessment Findings	Compliance
	d) The mill shall have documented procedures for receiving and processing certified and non-certified FFBs including ensuring no contamination in the IP mill.	The company has identified Mr. Vishnu Puspanathan (Mill manager) as the person having overall responsibility for and authority over the implementation of these requirements and compliance with all applicable requirements.	
3.8.6	<p>Internal Audit</p> <p>i) The mill shall have a written procedure to conduct annual internal audit to determine whether the mill:</p> <p>a. Conforms to the requirements in the RSPO Supply Chain Certification Standard and the RSPO Market Communications and Claims Documents.</p> <p>b. Effectively implements and maintains the standard requirements within its organisation.</p> <p>ii) Any non-conformities found as part of the internal audit shall be issued corrective action. The outcomes of the internal audits and all actions taken to correct non-conformities shall be subject to management review at least annually. The mill shall maintain the internal audit records and reports.</p>	The company has an Internal Audit Procedure dated 15/01/2020 and referenced SOP N°10/CRS AI (04)/0120 and approved by the General Manager. The company has conducted its internal audit for the mill supply chain for the year under review. Records of the audit was made available to the audit team for review. The audit was conducted in 4 th August 2021 by the Sustainability manager for Olam Palm Gabon a trained RSPO Lead Auditor. The results of the internal audit as reviewed did not identify any NCs	Complied
3.8.7	<p>Purchasing and Goods In</p> <p>i) The mill shall verify and document the tonnage and sources of certified and the tonnage of non-certified FFBs received.</p> <p>ii) The mill shall inform the CB immediately if there is a projected overproduction of certified tonnage.</p> <p>iii) The mill shall have a mechanism in place for handling non-conforming FFB and/or documents.</p>	The company takes delivery of both the certified and non-certified FFB from their certified and non-certified estates. All FFB coming to the mill are accompanied by a ticket with information on the source (estates) date, number of bunches and the average weight. The actual weight is obtained at the weighbridge	Complied
3.8.8	Sales and Goods Out	Some of the documents that accompany the sales of RSPO certified CPO are	Complied

Criterion / Indicator	Assessment Findings	Compliance
<p>The supplying mill shall ensure that the following minimum information for RSPO certified products is made available in document form. The information shall be complete and can be presented either on a single document or across a range of documents issued for RSPO certified oil palm products (for example, delivery notes, shipping documents and specification documentation):</p> <ul style="list-style-type: none"> a) The name and address of the buyer; b) The name and address of the seller; c) The loading or shipment / delivery date; d) The date on which the documents were issued; e) RSPO certificate number; f) A description of the product, including the applicable supply chain model (Identity Preserved or Mass Balance or the approved abbreviations); g) The quantity of the products delivered; h) Any related transport documentation; i) A unique identification number. 	<ul style="list-style-type: none"> 1. Bill of Lading 2. Sales Invoices <p>The sales document reviewed has all the information as required by the indicator captured on them.</p>	
<p>3.8.9 Outsourcing Activities</p> <ul style="list-style-type: none"> i) The mill shall not outsource its milling activities. In cases where the 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 ii) The mill shall ensure the following: 	<p>The company outsources the transportation and storage of all their CPO and PKO products with one company by name Gabon Special Economic Zone (their sister company). The company holds a valid contract with the outsource contractor. Review of the contract and attached addendum show all requirements of the indicator are met</p>	<p>Complied</p>

Criterion / Indicator		Assessment Findings	Compliance
	<ul style="list-style-type: none"> a) The mill has legal ownership of all input material to be included in outsourced processes b) The mill has an agreement or contract covering the outsourced process with each contractor through a signed and enforceable agreement with the contractor. The onus is on the mill to ensure that certification body (CB) has access to the outsourcing contractor or operation if an audit is deemed necessary. c) The mill has a documented control system with explicit procedures for the outsourced process which is communicated to the relevant contractor. d) The mill shall furthermore ensure (e.g. through contractual arrangements) that independent third parties engaged provide relevant access for duly accredited CBs to their respective operations, systems, and all information, when this is announced in advance. 		
3.8.10	The mill shall record the names and contact details of all contractors used for the physical handling of RSPO certified oil palm products.	The mill outsources the transportation and storage of RSPO certified CPO to only one third party contractor by name Gabon Special Economic Zone. The company has the contact details of the contractor which were available on the signed contracts and other documents	Complied
3.8.11	The mill shall inform its CB in advance prior to conduct of its next audit of the names and contact details of any new contractor used for the physical handling of RSPO certified oil palm products.	The company has not added to the list of contractors as of the time of the audit.	Complied
3.8.12	Record keeping <ul style="list-style-type: none"> i) The mill shall maintain accurate, complete, up-to-date and accessible records and reports covering all aspects of this RSPO Supply Chain Certification Standard requirements. 	The company keeps records of all their activities in the implementation of the supply chain. Some of the records kept by the company are Training records, Weighbridge records, Sales	Non-compliance

Criterion / Indicator	Assessment Findings	Compliance
<ul style="list-style-type: none"> ii) Retention times for all records and reports shall be a minimum of two (2) years and shall comply with relevant legal and regulatory requirements and be able to confirm the certified status of raw materials or products held in stock. iii) For Identity Preserved Module, the mill shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis. iv) For Mass Balance Module, the mill: <ul style="list-style-type: none"> a) Shall record and balance all receipts of RSPO certified FFB and deliveries of RSPO certified CPO and PK on a real-time basis and / or three-monthly basis. b) All volumes of certified CPO and PK that are delivered are deducted from the material accounting system according to conversion ratios stated by RSPO. c) The mill can only deliver Mass Balance sales from a positive stock. Positive stock can include product ordered for delivery within three (3) months. However, a mill is allowed to sell short (i.e. product can be sold before it is in stock). 	<p>records Production records, management review records, Internal Audit records, Supplier list.</p> <p>Review of the company's Supply chain and Traceability procedure indicate all relevant documents in relation to Supply chain and Traceability certification must be kept for a minimum period of 5 years.</p> <p>The company maintains a mass balance report in which records of production of FFB and sales of certified and conventional products are recorded. Review of the document shows inconsistencies in the production figures based on the formula applied and also some of the sales figures could not be accounted for. Hence, NC raised for this indicator.</p>	
<p>3.8.13 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 extraction rate as determined by the company are</p> <p>FFB-CPO is 24.05</p> <p>FFB-PK is 5.06</p>	<p>Complied</p>
<p>3.8.14 Extraction rates shall be updated periodically to ensure accuracy against actual performance or industry average if appropriate.</p>	<p>The OER is updated on monthly basis. The company keeps records of all the monthly OER. Reviewed their report for the accounting period from November 2020 to October 2021</p>	<p>Complied</p>

Criterion / Indicator		Assessment Findings	Compliance
3.8.15	<p>Processing</p> <p>For Identity Preserved Module, the mill shall assure and verify through documented procedures and record keeping that the RSPO certified oil palm product is kept separated from non-certified oil palm products, including during transport and storage to strive for 100% separation.</p>	N/A. the company implement the Mass balance supply chain module	Not Applicable
3.8.16	<p>Registration of Transactions</p> <p>i) Shipping Announcement in the RSPO IT platform shall be carried out by the mills when RSPO certified products are sold as certified to refineries, crushers, and traders not more than three months after dispatch with the dispatch date being the Bill of Lading or the dispatch documentation date.</p> <p>ii) Remove: RSPO certified volumes sold under different scheme or as conventional, or in case of underproduction, loss or damage shall be removed in the RSPO IT platform.</p>	Review the company's Palmtrace and in all the company has made three sales during the licensed period. Sales were made on the 02/06/2021 for 1172.21 MT, 31/01/2021 for 333.9 MT and 24/06/2021 for 2413.99MT. In all the shipping announcement has been confirmed.	Complied
3.8.17	<p>Claims</p> <p>The mill shall only make claims regarding the production of RSPO certified oil that are in compliance with the RSPO Rules on Market Communications and Claims.</p>	The company makes claims for the sale of all certified RSPO products on their sales documents. Reviewed sales documents including Bill of Lading, Commercial invoices and all had the description of RSPO-MB	Complied
General corporate communications			
4.1	A corporate communication is one made by any RSPO member that highlights its membership of the RSPO and/or its commitment to the principles of the RSPO. Corporate communication is an 'off-product' claim.	The company makes General corporate communication through display on the company's website. Review of the site has the message "We're fully supportive of the Roundtable on Sustainable Palm Oil (RSPO) and we are committed to working towards a traceable and transparent palm oil supply chain".	Complied

Criterion / Indicator		Assessment Findings	Compliance
		Other information such as the use of the RSPO web address (www.rspo.org) and RSPO trademark were not found on the company website	
4.2	In corporate communications a member is allowed to: <ul style="list-style-type: none"> a. Display its RSPO membership status b. Display the RSPO web address (www.rspo.org) c. State that the member supports the work of the RSPO d. State the member’s history with regard to the RSPO. e. Use the RSPO trademark to promote its membership of the RSPO. 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.	Same as above	Complied
4.3	In corporate communications RSPO members must not make any statement that may lead consumers to believe that RSPO membership by itself implies the selling of RSPO-certified oil palm products.	The display on the company’s website does not carry any message on the sale of RSPO-certified oil palm products	Complied
4.4	Members must ensure that all communication is consistent, clear and cannot mislead consumers or other stakeholders as to the certified content of oil palm products in the member’s own products.	The communication made on the site as reviewed is consistent, clear and does not carry any misleading information as to the certified content of oil palm products in the company’s own products.	Complied
4.5	Members are not allowed to use the RSPO corporate logo as shown in the RSPO Rules on Market Communications & Claims document. This is for the sole use of the RSPO secretariat.	Review of the company’s website did not establish the use of the RSPO corporate logo	Complied
Business to business communications			

Criterion / Indicator		Assessment Findings	Compliance
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 communicates their supply chain model to other organisation through their sales documents and contracts. Review of the sales documents shows the description of the supply chain model on the document. Also in the contracts with their business partners, the company communicates the supply chain model. Reviewed the contract with Louis Dreyfus Company Asia Pte where the commodity is captured as Crude Palm Oil, RSPO Mass Balance	Complied
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.	Reviewed sales documents to include Bill of Lading, Commercial invoices and in all the supply chain model and certificate number were clearly stated. Supply Chain Number: RSPO 671034 Supply Chain Model: RSPO MASS BALANCE	Complied
5.3	Where a distributor or wholesaler takes title to products containing certified sustainable oil palm products, the requirements of the RSPO SCCS can follow either of two options: a. If the distributor or wholesaler holds only a Distributor license, it may only communicate RSPO-certified oil palm products by linking the product to the manufacturer using the manufacturer’s SCCS certificate number. This covers both brand and own brand products. However, 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. b. If the distributor or wholesaler is supply chain-certified they should follow the requirements outlined in section 5.2.	N/A	Not Applicable
Business to consumer communication			

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

Criterion / Indicator		Assessment Findings	Compliance
6.1	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.	N/A. The company does not make sales to consumers	Not Applicable
6.2	Only RSPO members who have supply chain certification are authorised to use the RSPO trademark and/or RSPO label, with the exception of RSPO Credits and of retailers in accordance with 6.8 below.	Same as above	Not Applicable
6.3	When on-pack claims on RSPO-certified sustainable oil palm products are used, the RSPO trademark and associated identification number must be present.	Same as above	Not Applicable
6.4	Business to consumer communication shall not include information about the claimant's RSPO membership status.	Same as above	Not Applicable
6.5	Members shall not communicate to consumers' information about their suppliers' RSPO membership status.	Same as above	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.	Same as above	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.	Same as above	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	Same as above	Not Applicable

Criterion / Indicator		Assessment Findings	Compliance
	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 www.rspo.org .		
Principle 4: Respect community and human rights and deliver benefits			
Criterion 4.1: The unit of Certification respects human rights, which includes respecting the rights of Human Rights Defenders.			
4.1.1	(C) A policy to respect human rights, including prohibiting retaliation against Human Rights Defenders (HRDs), is documented and communicated to all levels of the workforce, operations, supply chain and local communities and prohibits intimidation, corruption and harassment by the unit of certification and contracted services, including contracted security forces. - Critical (Major) compliance -	The company has a documented Human Rights policy dated 01/09/2019 and approved by the General Manager. The policy has been shared with the communities as confirmed during the community consultations. Copies of the policy are also displayed on the company notice boards which were observed during field visits. Interview with the workers also confirmed the policy has been communicated to them during their morning musters and there were no reported cases of human rights violations.	Complied
4.1.2	The unit of certification does not instigate violence or use any form of harassment, including the use of mercenaries and paramilitaries in their operations. - Minor compliance -	Interview with workers and the communities did not establish the use of mercenaries and paramilitaries in the operations of the company.	Complied
Criterion 4.2: There is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all affected parties			
4.2.1	(C) The mutually agreed system, open to all affected parties, resolves disputes in an effective, timely and appropriate manner, ensuring	The company has a documented grievance mechanism titled "Procedure de gestion des Plaintes et Reclamations" referenced SOP	Complied

Criterion / Indicator		Assessment Findings	Compliance
	<p>anonymity of complainants, HRDs, community spokespersons and whistleblowers, where requested, without risk of reprisal or intimidation and follows the RSPO policy on respect for HRDs.</p> <p>- Critical (Major) compliance -</p>	<p>N°07/CRS-GP (7)/0120, dated 15/01/2020 and approved. The mechanism as reviewed outlines procedures for raising complaints for workers, communities, customers and suppliers. In each case the mechanism provides the channels to raise a complaint, ensures the anonymity of complainants and provides times for addressing the complaint.</p>	
4.2.2	<p>Procedures are in place to ensure that the system is understood by the affected parties, including by illiterate parties.</p> <p>- Minor compliance -</p>	<p>Interview with the communities during the audit period indicates the procedure has been shared and communicated to the communities.</p> <p>During field visit and interview with sampled workers in Estate 1, 2 and 3, it was established that the procedure has been communicated to them during their morning musters. Also workers were able to demonstrate knowledge of the procedure.</p>	Complied
4.2.3	<p>The unit of certification keeps parties affected by a grievance informed of its progress, including against agreed timeframe and the outcome is available and communicated to relevant stakeholders.</p> <p>- Minor compliance -</p>	<p>A review of the document indicates that at all time, parties involved will be informed of the progress of the case and the outcomes will be made available to the affected stakeholders.</p>	Complied
4.2.4	<p>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.</p> <p>- Minor compliance -</p>	<p>The procedure as reviewed indicates that complainants have the possibility of being helped or assisted by persons, institutions or groups of their choice and to have them as observers or to opt for mediation by an independent third party.</p> <p>Also complainants have the option of being assisted by one or more legal advisers of their choice.</p>	Complied
<p>Criterion 4.3: The unit of Certification contributes to local sustainable development as agreed by local communities.</p>			
4.3.1	<p>Contributions to community development that are based on the results of consultation with local communities are realised and documented.</p>	<p>To ensure contribution to social development, the company has a signed Social Contract which is a result of negotiation between the</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance
	- Minor compliance -	company and the communities. The Social Contract as reviewed was signed by the different community leaders and also by the different political administrative leaders to give it a legal status. The social contract for lot 1 was signed on Wednesday August 22, 2012. Review of documents and interview with community leaders establish the company has initiated some developmental projects with some completed and other are on-going.	
Criterion 4.4: Use of the land for oil palm does not diminish the legal, customary or user rights of other users without their free, prior and informed consent.			
4.4.1	<p>(C) Documents showing legal ownership or lease, or authorised use of customary land authorised by customary landowners through a Free, Prior and Informed (FPIC) process. Documents related to the history of land tenure and the actual legal or customary use of the land are available.</p> <p>- Critical (Major) compliance -</p>	<p>The right to legal use of land for Olam Palm Gabon was the result of an agreement between the government of Gabon and the company. Communities did not contribute land to the company's operations and there are no disputes over the land as confirmed by the communities during the audit interviews.</p> <p>Documents showing legal rights to the use of land by the company was made available to the audit team. The documents as reviewed shows right to land use was issued by the Award Decree of:</p> <ul style="list-style-type: none"> lot 1, granting the Company OLAM PALM, an Associated forestry permit (P.F.A) N ° 74/11 covering an area of 35,354 hectares for the implementation of the oil palm plantations of 11/09/2011. Lot 2: granting the Company OLAM PALM, an Associated forestry permit (P.F.A) N ° 74/12 covering an area of 31,800 hectares for the implementation of the oil palm plantations of 20/01/2012. 	Complied
4.4.2	Copies of documents evidencing agreement-making processes and negotiated agreements detailing the FPIC process are available and include:	There is a social agreement between Olam and the local populations impacted by its project. Reports of meetings explaining the project and identifying the living needs of the local populations were presented during the consultations	Complied

Criterion / Indicator		Assessment Findings	Compliance
4.4.2a	<p>Evidence that a plan has been developed through consultation and discussion in good faith with all affected groups in the communities, with particular assurance that vulnerable, minorities' and gender groups are consulted, and that information has been provided to all affected groups, including information on the steps that are taken to involve them in decision making.</p> <p>- Minor compliance -</p>	<p>There is a social agreement between Olam and the local populations impacted by its project. Reports of meetings explaining the project and identifying the living needs of the local populations were presented during the consultations</p> <p>According to the interviews carried out with the populations, during the various consultations, the needs of the populations were identified taking into account the strata that make it up. The populations also affirmed that they have the possibility of introducing requests, requests, reminders on the projects agreed upon during the social agreements, in the event of non-fulfilment or need for reorientation of the needs.</p>	Complied
4.4.2b	<p>Evidence that the unit of certification has respected communities' decisions to give or withhold their consent to the operation at the time that these decisions were taken.</p> <p>- Minor compliance -</p>	<p>The cross-documentary review between the archives kept by the communities and the evidence provided by the management, in particular, the social service of Olam, show that the proof of realization of the social agreements made between the two parties are monitored and evaluated. The communities use their notebooks to monitor and reassure themselves of the smooth running of the agreements. If necessary, communications are established to relaunch the management of Olam.</p>	Complied
4.4.2c	<p>Evidence that the legal, economic, environmental and social implications of permitting operations on their land have been understood and accepted by affected communities, including the implications for the legal status of their land at the expiry of the unit of certification's title, concession or lease on the land.</p> <p>- Minor compliance -</p>	<p>All the social agreements made between the two parties (Olam and the affected neighboring populations) are supervised by both administrative and local authorities. The contents of the agreements are always explained to the populations in order to better structure the negotiations and appreciate the changes and advancements.</p>	Complied
4.4.3	<p>(C) Maps of an appropriate scale showing the extent of recognised legal, customary or user rights are developed through participatory mapping</p>	<p>OPG-Bilala POM has map showing legal rights to the use of the land and was made available to the audit team for review. The maps were developed in consultation and participation of the communities</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance
	<p>involving affected parties (including neighbouring communities where applicable, and relevant authorities).</p> <p>- Critical (Major) compliance -</p>	<p>as confirmed by the communities during the community consultations. Also review of the company's social impact assessment report all established the participation of the communities in the development of the map.</p> <p>The interviews through the public consultations that we have granted to the affected neighboring communities have shown that the results of the mapping surveys have always been shared with them and discussed. In the event of no agreement, the authorities involved in the monitoring committee are contacted and discussions take place.</p>	
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>French is the official spoken and written language in Gabon and as such all documents shared with the communities, workers and displayed on company's notice boards are written in French. However, interview with the workers in the plantations and communities all indicated that all relevant information are explained to their understanding.</p>	Complied
4.4.5	<p>(C) Evidence is available to show that communities are represented through institutions or representatives of their own choosing, including by legal counsel if they so choose.</p> <p>- Critical (Major) compliance -</p>	<p>Communities during the consultations all indicated that they are represented by their traditional leaders who speaks and takes decisions on the communities behalf. The leaders in consultations with the communities can also appoint some people such as women representatives and youth leaders to represent the communities on some specific issues. The companies also maintains a list of all such leaders with their contacts and can be reached when needed.</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>	<p>Documented records exist to demonstrate that agreements made between affected parties and Olam are reviewed, discussed and redirected, based on the changing realities of populations. The chiefdoms of the villages met keep the files relating to the</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance
		negotiations with the management of Olam. Thus, each community has a notebook of grievances in which all negotiations are recorded.	
Criterion 4.5: No new plantings are established on local peoples' land where it can be demonstrated that there are legal, customary or user rights, without their FPIC. This is dealt with through a documented system that enables these and other stakeholders to express their views through their own representative institutions.			
4.5.1	(C) Documents showing identification and assessment of demonstrable legal, customary and user rights are available. - Critical (Major) compliance -	The social and environmental study report, led by the TERE research firm, participatory mapping, conducted and carried out by the Institute for Research and Tropical Studies (IRET), in agreement with the affected communities, to identify their areas of activity (fishing, gathering, hunting), sites of cultural importance (cemeteries, churches, etc.), the social contract between Olam management and the communities affected, public consultation reports, committee reports piloting, are all records, documented evidence that demonstrates the identification and assessment of legal, customary and usage rights.	Complied
4.5.2	(C) FPIC is obtained for all oil palm development through a comprehensive process, including in particular, full respect for their legal and customary rights to the territories, lands and resources via local communities' own representative institutions, with all the relevant information and documents made available, with option of resourced access to independent advice through a documented, long-term and two-way process of consultation and negotiation. - Critical (Major) compliance -	There is, at the management level of Olam, for the scope of the audit, a report of public consultation in the various communities impacted in a process of Free Prior Informed Consent. This activity report makes it possible to note that the management of Olam has exposed to the various communities its duty to take into account their community interests for certain sites of social and cultural importance. Thus, to monitor and ensure that the FPIC is valid for the entire duration of the oil palm development program and that it will be implemented, in accordance with the agreements made between Olam and the affected communities, a committee of steering committee (composed of representatives of the communities, village, political and administrative authorities and independent organizations) whose main mission is to monitor the evaluations and the implementation of the specifications, is in place.	Complied

Criterion / Indicator		Assessment Findings	Compliance
		Several activity reports in place show the effectiveness of their actions in the field, as part of project monitoring.	
4.5.3	<p>Evidence is available that affected local peoples understand they have the right to say 'no' to operations planned on their lands before and during initial discussions, during the stage of information gathering and associated consultations, during negotiations, and up until an agreement with the unit of certification is signed and ratified by these local peoples. Agreements have to be negotiated and entered into voluntarily prior to new operations and without coercion.</p> <p>- Minor compliance -</p>	<p>The right to reject planned operations on their lands before and during initial discussions, during information gathering and associated consultations, throughout negotiations, and until such local people sign and ratify an agreement with the certification unit is demonstrated by all the steps undertaken by the Olam Company since the project in 2015 to now.</p> <p>The realization of a participatory mapping, following a social and environmental impact study. The results were presented publicly to the affected communities with the aim that they speak out and provide observations and rejections, as was the case with Mbengui. The consultation activity reports are in place to demonstrate this.</p>	Complied
4.5.4	<p>To ensure local food and water security, as part of the FPIC process, participatory SEIA and participatory land-use planning with local peoples, the full range of food and water provisioning options are considered. There is transparency of the land allocation process.</p> <p>- Minor compliance -</p>	<p>The review of the participatory mapping (carried out by IRET: Institute for Research and Tropical Studies in April 2015), verified in the social impact study report (conducted and carried out by TERE, research firm of Gabonese law), shows that subsistence areas were identified, assessed by the communities who themselves took part in the field activities, then abandoned by Olam to allow the affected populations to practice their subsistence activities: gathering, fishing and chase.</p> <p>Interviews with village communities and review of the Social Impact Assessment demonstrated that Olam management involved communities in discussions and identification of areas sensitive to their survival, for the production of subsistence crops. .</p> <p>Thus, areas or sites that prove to be of undeniable importance for local residents are spared for their well-being.</p>	Complied

Criterion / Indicator	Assessment Findings	Compliance
<p>4.5.5 Evidence is available that the affected communities and rights holders have had the option to access information and advice, that is independent of the project proponent, concerning the legal, economic, environmental and social implications of the proposed operations on their lands.</p> <p>- Minor compliance -</p>	<p>Monitoring the implementation of social agreements involves the intervention of legal authorities duly established by the Gabonese Republic. Negotiations are also by these authorities to ensure that the specifications are executed in accordance with the agreements. As a result, affected parties have been able to access information and advice, independently of Olam, by entering entities of their choice, based on their interests and positions on certain matters of importance to them.</p> <p>In communications and other forms of information that the Olam Palm Company maintains with the affected communities, the affected parties are informed that they can be assisted by legal entities of their choice.</p> <p>This is the case of the village of Mbadi, which has engaged the services of the Word Wild Foundation as part of a study to determine the limit of the community forest it wants to enjoy. The representatives are still awaiting the results of this study to initiate certain discussions with Olam Palm Gabon</p>	<p>Complied</p>
<p>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.</p> <p>PROCEDURAL NOTE:</p> <p>In Gabon, it is the State which grants the concessions. The operator will then identify the areas of activity with the populations and obtain consent for the implementation of the project.</p> <p>- Minor compliance -</p>	<p>Activity reports:</p> <ul style="list-style-type: none"> -social agreements; -public consultations; -validation of studies; -explanation of procedures; - the negotiations of the specifications... show that the populations have been associated, consulted in the context of the identification of the activity zones which represent for them, subsistence zones for the practice of fishing, gathering and the hunt. 	<p>Complied</p>

Criterion / Indicator		Assessment Findings	Compliance
		Interviews with affected communities did not indicate a contrary approach.	
4.5.7	<p>New lands will not be acquired for plantations and mills after 15 November 2018 as a result of recent (2005 or later) expropriations in the national interest without consent (eminent domain), except in cases of smallholders benefitting from agrarian reform or anti-drug programmes.</p> <p>PROCEDURAL NOTE:</p> <p>In Gabon, it is the State which grants the concessions. The operator will then identify the areas of activity with the populations and obtain consent for the implementation of the project. The promoter identifies the populations living near his concession, informs them and decides, with them, of the co-management elements in the common areas.</p> <p>- Minor compliance -</p>	<p>N/A, The company has not acquired new land for plantations.</p> <p>The review of participatory mapping and Olam action areas, coupled with cross-interviews of communities and Olam management, show that since 2015, there has been no extension; no new plantations have been created.</p> <p>No community visited complained or indicated the creation of a new plantation in their area without their participation, apart from the exploitation permit of Olam.</p> <p>All the units visited in the scope of the audit fall within the permit granted to Olam by the State of Gabon.</p>	Not Applicable
4.5.8	<p>(C) New lands are not acquired in areas inhabited by communities in voluntary isolation.</p> <p>- Critical (Major) compliance -</p>	<p>N/A, The company has not acquired new land for plantations</p> <p>No evidence of acquisition of new land in areas inhabited by communities in voluntary isolation has been found.</p> <p>The map of the mining areas does not show any new acquisitions, compared to the permit granted to Olam. None of the affected communities interviewed complained of the extension or acquisition of new land by Olam in their area.</p>	Not Applicable
<p>Criterion 4.6: Any negotiations Concerning compensation for loss of legal, customary or user rights are dealt with through a documented system that enables indigenous peoples, local communities and other stakeholders to express their views through their own representative institutions.</p>			
4.6.1	<p>(C) A mutually agreed procedure for identifying legal, customary or user rights, and a procedure for identifying people entitled to compensation, is in place.</p> <p>- Critical (Major) compliance -</p>	<p>The legal and customary rights of affected communities and people are identified during the execution of participatory mapping; generally.</p>	Complied

Criterion / Indicator	Assessment Findings	Compliance
	<p>After participatory mapping; the management carries out an assessment of fruit trees and sites of benefit to members with the ministry of agriculture.</p> <p>In the event of accidental destruction or for the implementation of the project, the management calls on the Ministry of Agriculture, which assesses the destruction on the basis of a price list per crop and age of cultivation. Based on this scale, an invoice is drawn up to compensate the people concerned.</p> <p>At the start of the project, the group's management distributed a copy of this scale which is taken by decree N ° 1016 / PR / MAEPDR fixing the scale of compensation to be paid in the event of the voluntary destruction of crops, livestock, buildings, farming, fish ponds or fishery resources.</p> <p>A binder making it possible to trace all the compensatory indemnities linked to cases of destruction is available. For example, the installation of the administrative offices of PK 19 is an illustration of this, since they were installed in place of a camp, after discussion and negotiation at the end of which the Ministry of Agriculture decided a financial evaluation in 2012 (Recognition form for payment of compensation for the destruction of camp and crops of Mrs. MAGANGA Pélagie, in the amount of 507,500 FCFA, on 04/15/2013).</p>	
4.6.2	<p>(C) A mutually agreed procedure for calculating and distributing fair and gender-equal compensation (monetary or otherwise) is established and implemented, monitored and evaluated in a participatory way, and corrective actions taken as a result of this evaluation.</p> <p>- Critical (Major) compliance -</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance
		officially disseminated and accessible to all Gabonese by publication on social networks, in newspapers	
4.6.3	<p>Evidence is available that equal opportunities are provided to both men and women to hold land titles for small holdings.</p> <p>PROCEDURAL NOTE: In Gabon, land belongs to the State. For this reason, operators have no influence on the allocation of land titles.</p> <p>- Minor compliance -</p>	The local interpretation of the country makes note that the land belongs to the State which concedes it to an applicant, on the procedure which it proceeds. The company therefore has no possibility of influencing or impacting this process according to which men and women have the same opportunities to hold land titles within the framework of exploitation by small producers.	Not Applicable
4.6.4	<p>The process and outcomes of any negotiated agreements, compensation and payments are documented, with evidence of the participation of affected parties, and made publicly available to them.</p> <p>- Minor compliance -</p>	<p>The report of the steering committee, based on the social agreements with the communities which constitute the bulk of their demands, according to the compensation needs expressed, is available to demonstrate that the needs of the affected communities have been identified, discussed, with their authorities and the representatives they have elected.</p> <p>These agreements have been in place since 2016 and periodic reports are drawn up to assess the progress of the specifications.</p> <p>The steering committee's evaluation activity reports are available to the communities.</p> <p>The reports also contain the state of progress of the works and achievements, based on the grievances and agreements made between the parties.</p>	Complied
<p>Criterion 4.7: Where it can be demonstrated that local peoples have legal, customary or user rights, they are compensated for any agreed land acquisitions and relinquishment of rights, subject to their FPIC and negotiated agreements.</p>			
4.7.1	<p>(C) A mutually agreed procedure for identifying people entitled to compensation is in place.</p> <p>- Critical (Major) compliance -</p>	Olam management has a policy to identify those entitled to compensation.	Complied

Criterion / Indicator		Assessment Findings	Compliance
		<p>The procedure begins with a process of addressing complaints or requesting compensation for damages or injuries suffered for destruction or degradation of property or crops on the part of Olam. Then, after acknowledging receipt, Olam diligent, with the participation of the complainant for confirmation that the damage or destruction is due to Olam.</p> <p>With regard to compensation measures, the management of Olam is assisted by the Ministry of Agriculture which, on the basis of a scale fixed by decree No. 1016/PR/MAEPDR fixing the scale of compensation at pay in the event of willful destruction of crops, livestock, livestock buildings, fish ponds or fishery resources.</p> <p>The damage is therefore assessed on the basis of the scale, with the plaintiff's knowledge, and reparation is made, with all the recordings provided for by the procedure:</p> <ul style="list-style-type: none"> - compensation pv; - discharge letter that the plaintiff has actually received compensation. 	
4.7.2	<p>(C) A mutually agreed procedure for calculating and distributing fair compensation (monetary or otherwise) is in place and documented and made available to affected parties.</p> <p>- Critical (Major) compliance -</p>	<p>The procedure for calculating and distributing fair compensation for the compensation of the parties affected by the project is governed by law, in particular by decree No. 1016 / PR / MAEPDR setting the scale of compensation to be paid in the event of willful destruction. crops, livestock, livestock buildings, fish ponds or fishery resources.</p> <p>This scale is available at the management level of Olam Palm Gabon and accessible by way of dissemination on the internet and in the official journal.</p> <p>Olam's compensation procedure, according to the documentary review, is based on the method of calculation provided for by the State of Gabon.</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance
4.7.3	<p>Communities that have lost access and rights to land for plantation expansion are given opportunities to benefit from plantation development.</p> <p>- Minor compliance -</p>	<p>The review of the participatory mapping and the public consultations carried out with the various communities encountered, did not mention any case of a community having lost access and rights as part of the expansion of the plantations.</p>	Complied
<p>Criterion 4.8: The right to use the land is demonstrated and is not legitimately contested by local people who can demonstrate that they have legal, customary, or user rights.</p>			
4.8.1	<p>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.</p> <p>- Minor compliance -</p>	<p>The management of Olam Palm Gabon presented the legal documents which establish its right to use the land it operates and which were verified as part of the scope of the audit.</p> <p>Examination of the documents clearly shows that the granting of land falls within the competence of the State, which is the main owner, while recognizing the right of customary use of the populations.</p> <p>No dispute over the lands occupied within the perimeter of the Olam Palm Gabon permit was recorded or denounced during public consultations with the affected communities.</p> <p>The only community that refused to exploit its land within the scope of the Olam Palm Gabon permit is that of Mbengui (reports and attendance lists of February 16, 2016).</p> <p>In response, Olam Palm Gabon removed this community from its operating perimeter and it was considered as a community not impacted by the project.</p> <p>this law was replaced by law No. 16/2001 on the forest code in the Gabonese Republic repealing any distance to be observed in relation to any dwellings in the permit of a purchaser.</p> <p>As a reminder, the Olam Company is subject to the agricultural code and not to the forest code.</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance
4.8.2	<p>(C) Land conflict is not present in the area of the unit of certification. Where land conflict exists, acceptable conflict resolution processes (see Criteria 4.2 and 4.6) are implemented and accepted by the parties involved. In the case of newly acquired plantations, the unit of certification addresses any unresolved conflict through appropriate conflict resolution mechanisms.</p> <p>- Critical (Major) compliance -</p>	<p>No cases of land conflict have been identified or reported.</p> <p>The review of CLIP reports did not reveal any conflict with a community.</p> <p>Olam Palm Gabon has a permit to exploit the land where its plantations are located. The exploitation areas are not the subject of any dispute or dispute, especially since it is the State, as the legal owner, who has made the transfer.</p>	Complied
4.8.3	<p>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 rights, these claims will be settled using the relevant requirements (Indicators 4.4.2, 4.4.3 and 4.4.4).</p> <p>- Minor compliance -</p>	<p>No evidence of acquisition through dispossession or forced abandonment of customary rights and use rights prior to current operations has been identified.</p> <p>The participatory mapping and FPIC reports did not mention any situation relating to the dispossession or abandonment of the customary rights of a given community.</p>	Complied
4.8.4	<p>For any conflict or dispute over the land, the extent of the disputed area is mapped out in a participatory way with involvement of affected parties (including neighbouring communities where applicable).</p> <p>- Minor compliance -</p>	<p>The consultations carried out with the communities met during the audit did not raise any disputes related to disputes over the use of land granted to Olam Palm Gabon, within the framework of its permit granted to it by the Gabonese state.</p>	Complied
Principle 5: Support smallholder inclusion			
Criterion 5.1: The unit of certification deals fairly and transparently with all smallholders (Independent and Scheme) and other local businesses.			
5.1.1	<p>Current and previous period prices paid for FFB are publicly available and accessible by smallholders.</p> <p>- Minor compliance -</p>	<p>N/A. The company does not have smallholders or outgrowers in their FFB supply chain. All FFB for the mill are sourced from the company's own estates.</p>	Not Applicable
5.1.2	<p>(C) Evidence is available that the unit of certification regularly explains the FFB pricing to smallholders.</p>	<p>Same as above (5.1.1)</p>	Not Applicable

Criterion / Indicator		Assessment Findings	Compliance
	- Critical (Major) compliance -		
5.1.3	(C) Fair pricing, including premium pricing, when applicable, is agreed with smallholders in the supply base and documented - Critical (Major) compliance -	Same as above (5.1.1)	Not Applicable
5.1.4	(C) Evidence is available that all parties, including women and independent representative organisations assisting smallholders where requested, are involved in decision-making processes and understand the contracts. These include those involving finance, loans/credits, and repayments through FFB price reductions for replanting and/or other support mechanisms where applicable. - Critical (Major) compliance -	Same as above (5.1.1)	Not Applicable
5.1.5	Contracts are fair, legal and transparent and have an agreed timeframe. - Minor compliance -	Same as above (5.1.1)	Not Applicable
5.1.6	(C) Agreed payments are made in a timely manner and receipts specifying price, weight, deductions and amount paid are given. - Critical (Major) compliance -	Same as above (5.1.1)	Not Applicable
5.1.7	Weighing equipment is verified by an independent third party on a regular basis (this can be government). - Minor compliance -	Same as above (5.1.1)	Not Applicable
5.1.8	The unit of certification supports Independent Smallholders with certification, where applicable, ensuring mutual agreements between the unit of certification and the smallholders on who runs the internal control system (ICS), who holds the certificates, and who holds and sells the certified material. - Minor compliance -	Same as above (5.1.1)	Not Applicable

Criterion / Indicator		Assessment Findings	Compliance
5.1.9	<p>(C) The unit of certification has a grievance mechanism for smallholders and all grievances raised are dealt with in a timely manner.</p> <p>- Critical (Major) compliance -</p>	Same as above (5.1.1)	Not Applicable
<p>Criterion 5.2: The unit of certification supports improved livelihoods of smallholders and their inclusion in sustainable palm oil value chains.</p>			
5.2.1	<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>- Minor compliance -</p>	Same as above (5.1.1)	Not Applicable
5.2.2	<p>The unit of certification develops and implements livelihood improvement programmes, including at least capacity building to enhance productivity, quality, organisational and managerial competencies, and specific elements of RSPO certification (including the RSPO Standard for Independent Smallholder).</p> <p>PROCEDURAL NOTE: The RSPO just developed a separate standard for Independent Smallholders and the Gabon NIWG decided to make it applicable for all Independent Smallholders in Gabon (see Annex 6).</p> <p>- Minor compliance -</p>	Same as above (5.1.1)	Not Applicable
5.2.3	<p>Where applicable, the unit of certification provides support to smallholders to promote legality of FFB production.</p> <p>- Minor compliance -</p>	Same as above (5.1.1)	Not Applicable
5.2.4	<p>(C) Evidence exists that the unit of certification trains Scheme Smallholders on pesticide handling.</p> <p>- Critical (Major) compliance -</p>	Same as above (5.1.1)	Not Applicable

Criterion / Indicator		Assessment Findings	Compliance
5.2.5	The unit of certification regularly reviews and publicly reports on the progress of the smallholder support programme. - Minor compliance -	Same as above (5.1.1)	Not Applicable
Principle 6: Respect workers' rights and conditions			
Criterion 6.1: Any form of discrimination is prohibited.			
6.1.1	(C) A publicly available non-discrimination and equal opportunity policy is implemented in such a way to prevent discrimination based on ethnic origin, caste, national origin, religion, disability, gender, sexual orientation, gender identity, union membership, political affiliation or the age legally authorized at the national level. - Critical (Major) compliance -	The company has a policy of combating discrimination of all kinds within its operations and it was made available to the audit team for review. The scope of the policy covers both workers of Olam and also their 3 rd party contractors.	Complied
6.1.2	(C) Evidence is provided that workers and groups including local communities, women, and migrant workers have not been discriminated against. Evidence includes migrant workers' non-payment of recruitment fees. - Critical (Major) compliance -	During field visit and interview with workers in Estate 1 (block P61-P62, S65), Estate 2 (block S58, R57 and T54) and Estate 3 (block O39, 5M and 5F) all confirmed that there are no cases of discrimination in the company.	Complied
6.1.3	The unit of certification demonstrates that recruitment selection, hiring, access to training and promotion are based on skills, capabilities, qualities and medical fitness necessary for the jobs available. - Minor compliance -	Olam management has a policy for the recruitment of workers. This approach begins with an announcement that uses various channels: email, information notes, etc. The note specifies: the vacant position, the location of the position, the deadline for submitting applications; the place of deposit... Once the files have been submitted, the files are studied by the HRD and the associated services which have expressed the need for recruitment.	Complied

Criterion / Indicator	Assessment Findings	Compliance
	<p>The recruitment of workers on the verification of the skills required by management, according to the profiles sought.</p> <p>Competences can consist of various proofs:</p> <ul style="list-style-type: none"> -diplomas ; - certificates (work, training, etc.); - the oral demonstration of his competence... <p>Following this, the pre-selected candidate worker is invited to defend their profiles through live or remote interviews (electronically).</p> <p>Depending on the performance assessed, the best profile is retained. The management informs the other candidates of the results and summons the successful candidate.</p> <p>A confirmation of his interest in the position is made; a medical examination is carried out and the drafting of the contract follows.</p> <p>The last stage consists for him to undergo an induction on the knowledge of the policies, the applicable laws.</p> <p>After that, he is registered in the payroll system (registration number), he is presented to his position, to his colleagues and other workers for his integration.</p> <p>The auditor checked several worker files and realized that the various files examined comply with the recruitment policy. We note among others:</p> <ul style="list-style-type: none"> - The expressed demand for employment; - The curriculum vitae of the applicant, tracing his skills; 	

Criterion / Indicator		Assessment Findings	Compliance
		<ul style="list-style-type: none"> - Proof of competence (diplomas, certificates of all kinds); - Evidence of the worker's assessment; - The letter of commitment.. 	
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> <ul style="list-style-type: none"> - Minor compliance - 	<p>Interview with female workers in estates 1,2 and 3 all indicated that pregnancy testing is conducted prior to been employed as a sprayer or chemical applicator and periodically in the course of working with chemicals. However, they indicated that this is a precautionary measure to prevent pregnant workers from handling chemicals. Chemical applicators found to be pregnant are transferred to other sector for their safety but not as a discriminatory measure.</p>	Complied
6.1.5	<p>(C) A gender committee is in place specifically to raise awareness, identify and address issues of concern, as well as opportunities and improvements for women.</p> <ul style="list-style-type: none"> - Critical (Major) compliance - 	<p>The company has a Gender Committee in place established in September 14, 2017. The objectives of the Gender Committee includes:</p> <ol style="list-style-type: none"> 1. fight against sexual harassment, moral harassment; 2. fight against discrimination; 3. investigate complaints filed; 4. protect reproductive rights of women 5. fight against all forms of abuse <p>The committee is made up of 6 members who conducts sensitization programs at periodic intervals. Some evidence of awareness conducted by the committee are</p> <ol style="list-style-type: none"> 1. 06 August 201: awareness session at the Bilala plant; factory staff 2. From July 16 to 23, 2021: an awareness campaign on lots 1 and 2 for managers, drivers, housekeeper and filed workers 	Complied

Criterion / Indicator		Assessment Findings	Compliance
6.1.6	<p>There is evidence of equal pay for the same work scope and provision of similar necessary working tools.</p> <p>PROCEDURAL NOTE: The verification is based on the sectoral collective agreement or, failing that, a company-wide agreement, or any other document recognized by the administration which clearly stipulates the applicable salary bases.</p> <p>- Minor compliance -</p>	<p>The company has a documented salary scale base on which the salaries of workers are determined with reference to the workers category. Review of a sampled workers contracts showed that workers in the same category receives same salaries. Also interview with workers in the estates confirmed there is equal pay for the same scope of work done.</p>	Complied
<p>Criterion 6.2: Pay and conditions for staff and workers and for contract workers always meet at least legal or industry minimum standards and are sufficient to provide decent living wages (DLW).</p>			
6.2.1	<p>(C) Applicable labour laws, union and/or other collective agreements and documentation of pay (Salary grid published, same salary for the same position) and conditions are available to the workers in national languages and explained to them in a language they understand.</p> <p>PROCEDURAL NOTE: The verification is based on the sectoral collective agreement or, failing that, a company-wide agreement, or any other document recognized by the administration which clearly stipulates the applicable salary bases.</p> <p>- Critical (Major) compliance -</p>	<p>Workers have access to the bargaining agreement which is the result of negotiation on the conditions of work between workers union and management of OPG-Bilala POM. The agreement outlines the salary structure and working condition in line with the country's laws. Also workers upon appointment are issued contracts of employment. Review of sampled contracts contains the details of the worker's salary and various working conditions. All these documents made available to the workers are written in French which is the official language in the country. However, workers also indicated that the contents of all such documents are explained to their understanding.</p>	Complied
6.2.2	<p>(C) Employment contracts and related documents detailing payments and conditions of employment (e.g. regular working hours, deductions, overtime, sick leave, holiday entitlement, maternity leave, reasons for dismissal, period of notice, etc. in compliance with national legal requirements) and payroll documents give accurate information on compensation for all work performed, including work done by family members.</p>	<p>Workers upon appointment are issued contract documents. A review of sampled contract documents contains information on salary, working hours, holiday entitlement, reasons for dismissal and many more. Also workers at the end of each month are issued payslip which provides information on the working hours, amount earned, deductions and many more. Interview with workers in Estate 1 (block P61-P62, S65), Estate 2 (block S58, R57 and T54)</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance
	- Critical (Major) compliance -	and Estate 3 (block O39, 5M and 5F) established that the document give accurate information on compensation for all work done.	
6.2.3	<p>(C) There is evidence of legal compliance for regular working hours, deductions, overtime, sickness, holiday entitlement, maternity leave, reasons for dismissal, period of notice and other legal labour requirements.</p> <p>- Critical (Major) compliance -</p>	Review of the collective agreement for workers and sampled workers contract establishes legal compliance. Workers are required to work eight hours a day as required by the country's laws. All workers in excess of the mandated eight hours are treated as overtime. Also female workers are giving three months maternity leave. Review of workers file also indicates reason for dismissals are provided when workers appointment are terminated. Field visit and interview with sampled workers established compliance.	Complied
6.2.4	<p>(C) The unit of certification provides adequate housing, sanitation facilities, drinking water supplies, medical, educational and welfare amenities to national standards or above, where no such public facilities are available or accessible. National laws, or in their absence the ILO Guidance on Workers' Housing Recommendation No. 115, are used. In the case of acquisitions of non-certified units, a plan is developed detailing the upgrade of infrastructure. A reasonable time (5 years) is allowed to upgrade the infrastructure.</p> <p>- Critical (Major) compliance -</p>	<p>The company has made housing allocations to some of their workers (permanent and contract workers). Allocation of housing is guided by the company's internal social policy. Workers who are not able to secure housing from the company are given monthly housing allowance to rent from the neighbouring communities.</p> <p>Field visit to the workers housing shows workers are also provided with sanitation facilities, water supply. The company also has a medical facility with a resident doctor to attend to the workers medical needs.</p>	Complied
6.2.5	<p>The unit of certification makes efforts to improve workers' access to adequate, sufficient and affordable food.</p> <p>- Minor compliance -</p>	<p>The management of Olam Palm Gabon has set up a commissary whose essential mission is to bring its workers as close as possible to products and other basic necessities on the work site.</p> <p>A duly established contract between Olam Palm Gabon and the third party holder of the commissary has been established for more than five years with certain clearly established clauses which</p>	Complied

Criterion / Indicator	Assessment Findings	Compliance
	<p>demonstrate Olam Palm Gabon's desire to allow access to healthy food for its workers:</p> <ul style="list-style-type: none"> - The prohibition to sell products that have passed their expiry date; - The obligation to practice approved prices on the establishment site; - The display of product prices, for transparency... <p>It should be recalled that apart from the legal checks carried out by the Ministry of Commerce, within the framework of the application of the laws, the social service of Olam Palm Gabon carries out its own checks on the effectiveness of the implementation of the measures contractual, to ensure that there is no unfair price spike, and also to control the hygiene of the products available in the stocks, but and above all, to check the expiry dates of the products sold in the commissary. Checks are carried out monthly. The latest reports date back to September and October 2021.</p> <p>The workers interviewed for this survey confirmed that they have access to decent food at affordable prices.</p> <p>In addition, every two times a week, shuttles are provided for the benefit of workers in order to go shop in town for all those who feel the need and who cannot find the products of their choice at the level of the commissary.</p> <p>Also, Olam authorizes private transporters to access the site for the movement of workers.</p>	

Criterion / Indicator	Assessment Findings	Compliance
<p>6.2.6 A DLW is paid to all workers, including those on piece rate/quotas, for whom the calculation is based on achievable quotas during regular work hours.</p> <p>PROCEDURAL NOTE: STATEMENT FROM THE RSPO STANDARDS STANDING COMMITTEE REGARDING INDICATOR 6.2.6 ON DECENT LIVING WAGE (Endorsed by the RSPO BoG on 7th November 2019)</p> <p>With reference to procedural note of indicator 6.2.6, the RSPO has published a guidance on the DLW calculation in June 2019. The RSPO Secretariat will endeavour to carry out DLW country benchmarks for palm oil producing countries in which RSPO members operate and for which no Global Living Wage Coalition (GLWC) benchmarks exist¹.</p> <p><i>Where a GLWC living wage standard (benchmark), or one that fulfils the basic requirements of the RSPO- endorsed living wage methodology, has been established in the country or region of operation, the same should be used as benchmarks.</i></p> <p>In the absence of such benchmarks, the RSPO will collaborate with the GLWC and/or local experts on developing oil palm industry benchmarks². These benchmarks will be developed in collaboration and consultation with relevant stakeholders such as palm oil industry members, workers’ union, authorities and/or relevant organisations.</p> <p><i>For countries where no living wage standard is established, until such time that an RSPO endorsed benchmark for the country is in place, national minimum wages shall be paid to all workers. In addition to the payment of minimum wages, the Unit of Certification (UoC) shall conduct an assessment of the prevailing wages and in-kind benefits provided to workers in the Unit of Certification aligned with the RSPO Guidance for Implementing a Decent Living Wage³.</i></p> <p>The Gabon NIWG will, on their side, start identifying the existent national statistics necessary for the calculations as stipulated in the new RSPO-endorsed living wage methodology.</p> <p>Once these benchmarks are available, this procedural note is no longer applicable. UoC shall have an implementation plan towards the payment of a DLW with specific targets, and a phased implementation process including:</p> <ul style="list-style-type: none"> Updated assessment on prevailing wages and in-kind benefits 	<p>A review of Olam Palm Gabon's payroll procedures shows that salaries are paid on the following basis:</p> <ul style="list-style-type: none"> The labor code in the Gabonese Republic; which provides and organizes the official salary scales provided for by law; supplemented by an ordinance which sets the minimum monthly income at 150,000 F taxable (Ordinance No. 018/PR/2010 of February 25, 2010; 80,000 F, the non-taxable guaranteed interprofessional minimum wage (SMIG). The establishment agreement which brings together the agreements signed between the company and the workers: on the social level. This document comes to mark its agreement with this ordinance and to specify that according to the category of the worker, the minimum wage can be beyond, taking into account the parameters on the size of the family (number of dependent children), the professional category of the employee... <p>In Gabon, a calculation basis has not yet been officially established. Examination of the different payslips of a sample of workers shows that the basis of salary payment is respected; in addition, the company grants workers the legal benefits provided for by law and which appear on their various payslips.</p> <p>At the level of Olam Palm Gabon, the elements taken into account and added to the salary to allow workers to have a decent salary are:</p> <ul style="list-style-type: none"> The granting of accommodation, at the expense of the employer; Access to electricity 	<p>Complied</p>

Criterion / Indicator		Assessment Findings	Compliance
	<ul style="list-style-type: none"> There is annual progress on the implementation of living wages Where a minimum wage, based on equivalent of baskets of goods, is stipulated in Collective Bargaining Agreements (CBAs), this should be used as the foundation for the gradual implementation of the living wage payment The UoC may choose to implement the living wage payment in a specific section as a pilot project; the pilot will then be evaluated and adapted before eventual scale up of the living wage implementation. <p>- Minor compliance -</p>		
6.2.7	<p>Permanent, full-time employment including contractors' workers and contracted workers is used for all core work performed by the unit of certification. Casual, temporary and day labour is limited to jobs that are temporary or seasonal.</p> <p>- Minor compliance -</p>	<p>The company engages two categories of workers in their operations. These are permanent workers who are directly employed by the company and the contract workers who are recruited by third party contractors. Review of sampled contracts and payslips for contract and permanent workers establishes that they work full time. Also during field visit and interview with sampled workers in plantation confirmed compliance.</p>	Complied
<p>Criterion 6.3: The unit of Certification respects the rights of all personnel to form and join trade unions of their choice and to bargain collectively. Where the right to freedom of association and collective bargaining are restricted under law, the employer facilitates parallel means of independent and free association and bargaining for all such personnel.</p>			
6.3.1	<p>(C) A published statement recognising freedom of association and right to collective bargaining in national languages is available and is explained to all workers in languages that they understand, and is demonstrably implemented. The official language is the language which is recognized as such in the constitution and / or the laws of the country concerned. It is the language used in government and public services.</p> <p>- Critical (Major) compliance -</p>	<p>The company has a published statement recognizing the freedom of association and the rights to collective bargaining. The document is written in French which is the official language in Gabon. However, interview with the workers indicated the content of the document has been clearly explained to them during the musters.</p> <p>Currently there exist a workers union with their elected representatives who ensures the rights of workers are protected at all times. They also engages with the management of OPG-Bilala POM on workers working conditions and welfare. Interview with workers and their representatives indicates there are no management interference in the operations of the union.</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance
6.3.2	Minutes of meetings between the unit of certification with trade unions or workers representatives, who are freely elected, are documented in national languages and made available upon request. - Minor compliance -	Management of OPG-Bilala holds periodic meetings with the workers representatives and also whenever necessary. There are reports on minutes of meeting with attendance records for every meeting held and copies are signed and shared by both parties. Copies of the minutes of meetings which were written in French were seen and reviewed.	Complied
6.3.3	Management does not interfere with the formation or operation of registered unions/ labour organisations or associations, or other freely elected representatives for all workers including migrant and contract workers. - Minor compliance -	As indicated in 6.3.1 above	Complied
Criterion 6.4: Children are not employed or exploited.			
6.4.1	A formal policy for the protection of children, including prohibition of child labour and remediation is in place, and included into service contracts and supplier agreements. - Minor compliance -	OPG-Bilala POM has a documented policy for the protection of children including the fight against trafficking, smuggling and all forms of violence against children. The policy is displayed on the company's notice boards. Reviewed contract of agreement between Dirane Gamnjie Ngala Service (DGNS), Espace –vert Service and Olam Palm Gabon for field maintenance and also between Okola Transport service and Olam Palm Gabon for the transportation of workers and FFB. All contracts contain clauses on disallowing child labour. Also during field visit, there was no observation made of children working in the fields and interview with sampled workers indicates the policy has been explained to them during induction and at their morning musters.	Complied
6.4.2	(C) There is evidence that minimum age requirements are met. Personnel files show that all workers are above the national minimum age or above	During recruitment of workers (both permanent and contract) for OPG operations, the company requires workers to present	Complied

Criterion / Indicator		Assessment Findings	Compliance
	company policy minimum age, whichever is higher. There is a documented age screening verification procedure that is to say, provision of a national identity document for the national worker officially recognized at national level and a residence permit (CDS - Carte de séjour in French) for the foreign worker which is the subject of documentation. - Critical (Major) compliance -	identification documents for the verification of their ages. The country's legal minimum working age is 18 years and review of sampled workers files did not identify any worker below 18 years. During filed visit to the plantations and interview with workers did not identify any worker below the minimum working age.	
6.4.3	(C) Young workers (between 16 and 18 years old) are not employed in RSPO certified companies in Gabon. The minimum age is 18 years old. - Critical (Major) compliance -	The company does not employ young workers in their operations. Review of sampled workers files and interview with workers in the filed establish compliance to the indicator.	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 is displayed on the company's notice boards. Interview with workers indicates the policy has been communicated to them at their morning musters. Also during stakeholders consultations with the communities and third party contractors, they did confirm the policy has been share with them and communicated to their understanding.	Complied
Criterion 6.5: There is no harassment or abuse in the workplace, and reproductive rights are protected.			
6.5.1	(C) A policy to prevent sexual and all other forms of harassment and violence is implemented and communicated to all levels of the workforce. - Critical (Major) compliance -	OPG-Bilala POM has a documented policy to prevent sexual harassment and all other forms of harassment and approved by the General Manager. The policy has been displayed on the company's notice boards. Copies of the policy has been shared with the communities and the third party contractors who indicated the policy has been communicated to their understanding. Interview with sampled workers all confirmed the policy is communicated to them during induction and at their morning musters	Complied

Criterion / Indicator		Assessment Findings	Compliance
6.5.2	<p>(C) A policy to protect the reproductive rights of all, especially of women, is implemented and communicated to all levels of the workforce.</p> <p>- Critical (Major) compliance -</p>	<p>OPG-Bilala POM has a documented Reproductive policy which is approved by the General Manager. The policy has been displayed on the company's notice boards. Interview with sampled workers all confirmed the policy has been communicated to them during induction and at their morning musters</p>	Complied
6.5.3	<p>Management has assessed the needs of new mothers, in consultation with the new mothers, and actions are taken to address the needs that have been identified.</p> <p>- Minor compliance -</p>	<p>Management through the activities of the Gender Committee engages with the new mothers to assess their needs and make provisions that addresses such needs. Interview with some female workers during field visit indicates the Gender Committee through their activities meets with new mothers. Records of some of such meetings were made available for review.</p>	Complied
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>OPG-Bilala has a documented grievance mechanism captioned "PROCEDURE DE GESTION DES PLAINTES ET RECLAMATIONS" last revised in January 2020 and approved by the vice president of OPG.</p> <p>The purpose of this mechanism is to define the mode of handling complaints made against or addressed to Olam Palm Gabon.</p> <p>A mechanism as reviewed ensures the anonymity and protects complaints by providing a various means of registering your complaints.</p> <p>Interview with the workers indicates the grievance mechanism has been explained to them during their morning muster.</p> <p>To implement the mechanism, the company makes available a number of mechanism for submitting complaints. They include the use of form, letters, orally or sent by email to the Human Resources department or directly to the social service or through village representatives. The company has also made a list of emails available for use by the complainants</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance
Criterion 6.6: No forms of forced or trafficked labour are used.			
6.6.1	<p>(C) All work is voluntary and the following are prohibited:</p> <ul style="list-style-type: none"> Retention of identity documents or passports Payment of recruitment fees Contract substitution Involuntary overtime. Lack of freedom of workers to resign Penalty for termination of employment Debt bondage Withholding of wages <p>- Critical (Major) compliance -</p>	<p>Interview with sampled workers and review of sampled workers files did not identify migrant workers in the operations of OPG. Also workers interviewed indicate there is no form of forced labour in the company.</p>	Complied
6.6.2	<p>(C) Where temporary or migrant workers are employed, a specific labour policy and procedures are established and implemented.</p> <p>- Critical (Major) compliance -</p>	<p>Review of documents and interview with the workers did not identify any temporal or migrant workers in OPG operations.</p>	Complied
Criterion 6.7: The unit of certification ensures that the working environment under its control is safe and without undue risk to health.			
6.7.1	<p>(C) The responsible person(s) for H&S is identified. There are records of regular meetings between the responsible person(s) and workers. Concerns of all parties about health, safety and welfare are discussed at these meetings, and any issues raised are recorded.</p> <p>- Critical (Major) compliance -</p>	<p>The company has identified Bignoumba Mombo as the responsible person for Health and Safety issues. She works with a team Health and Safety Committee members selected from the estates. As the H&S person she holds meetings with the workers on needs basis. During such meetings, the H&S person takes feedbacks from the workers for a follow up action. Records of minutes of meetings between the H&S person with workers were made available to the audit team for review. They include</p> <ul style="list-style-type: none"> 6. Agenda: Safe Handling of Pesticides Date:20/05/2021 Site: Estate 5 	Complied

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

Criterion / Indicator		Assessment Findings	Compliance
		<p>Attendance: 10</p> <p>7. Agenda: Safe Handling of Fire Extinguishers during Fire Date:16/11/2021 Site: PK 19 Attendance: 4</p> <p>The meetings received no comments from the workers. However, interview with sampled workers did confirm such meetings took place.</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>The company has identified different emergency situations in their operational areas to include fire, accident, spillage of fuel, chemical contamination and in each case the company has developed and documented procedures to be followed. Sampled emergency procedures were made available for review. Copies of the procedures has been made available at the various working sites.</p> <p>Field visit to the chemical mixing point and the chemical store shows copies of the emergency procedures displayed at the entrance to the store and mixing point. Interview with some pesticide sprayers at Estate 1 and 2 shows workers have some knowledge on the procedure although a few were unable to demonstrate sufficient knowledge of the procedure.</p> <p>Also visit to Estate 1,2 and 3 where sprayers were working during site visit shows each unit of the spraying team has a trained first aider with first aid kit filled with all the necessary material needed to provide first aid when the need arises. Interview with the company's resident doctor indicates he provide training to the first aiders on an annual basis although the country laws stipulates one training every two years. Records of training conducted for the first</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance
		<p>aiders was made available to the audit team for review. Evidence of training conducted on the 11/11/2021 for 52 first aiders was made available to the audit team for review.</p> <p>The company maintains records of accidents that occur in the estates in an excel report captioned "Accident Statistics of Olam Palm Gabon-2021". The report as reviewed has records all on accidents according to FAC, LTA, MTC and RWC. The report has been updated from January to October 2021.</p>	
6.7.3	<p>(C) Workers use appropriate personal protective equipment (PPE), which is provided free of charge to all workers at the place of work to cover all potentially hazardous operations, such as pesticide application, machine operations, land preparation, and harvesting. Sanitation facilities for those 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>During field visit to Estate 1, 2 and 3, it was observed that pesticide sprayers, harvester and loose fruit pickers were all working using the appropriate PPEs such as helmets, wellington boots, leather gloves and rubber gloves among many. The supply of PPE for any work is based on the associated risk identified for the activity. Interview with the workers indicates the PPEs were supplied to them at no cost and replacement is made when old worn out and damaged PPEs are made available. Copies of the PPEs distribution list confirming the issuance of PPEs to workers were made available to the audit team. Review of the PPE Datasheet shows the issuance of different PPEs to workers. They include:</p> <ol style="list-style-type: none"> 1. Activity: Spraying Date: 17/09/2021 Type of PPE: Booths Total Issued: 17 pieces 2. Activity: Spraying Date: 13/11/2021 Type of PPE: Nose mask 	OFI

Criterion / Indicator		Assessment Findings	Compliance
		<p>Total Issued: 13 pieces</p> <p>3. Activity: Spraying Date: 06/09/2021 Type of PPE: Overall, gloves, nose mask Total Issued: 8 pieces</p> <p>The company has also made available Sanitation facilities for pesticides applicators to change out of PPE, wash and put on their personal clothing after close of work. Visit to the facility shows waste water from the washing of the PPEs drain into a soakaway without flowing into any nearby water.</p> <p>However, there is only one room shared by both the male and female pesticide applicators. Interview with the workers indicates the male stay out whiles the women change into their clothes and after which the men move in to change. This is raised as an OFI for the company to work on providing a separate changing rooms for both men and female.</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>In Gabon all citizens including Olam workers are covered by a National Insurance Policy Covers. However, the company has a residential clinic that provide first aid to their workers and families and the cost of treatment is then borne by the government insurance agency. In the event of an accident, the company by the national law is required to provide 24 hours' health service to ensure the life of the worker is secured and after which they government take care of the rest. Each month the company make contribution to the government in the form of CNSS which covers payment for social security, maternity leave and accident insurance.</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance
6.7.5	Occupational injuries are recorded using Lost Time Accident (LTA). - Minor compliance -	Reviewed an excel report captioned "Plantations HSE Lagging Key Safety Indicator". The report shows the calculations for the occupational injuries using the LTA. The report has been updated from Jan to Oct and the total LTA recorded is 45 for all worker including contract workers	Complied
Principle 7: Protect, conserve and enhance ecosystems and the environment			
Criterion 7.1: Pests, diseases, weeds and invasive introduced species are effectively managed using appropriate Integrated Pest Management (IPM) techniques.			
7.1.1	(C) IPM plans are implemented and monitored to ensure effective pest control. - Critical (Major) compliance -	OPG has identified Elephants as the major pests and consequently developed a plan to manage elephant intrusion (Olam palm Gabon – Elephant Control, Reviewed Strategy and Structure to Efficiently Address Crop Destruction, Version 4, November 2018). As part of the strategy to manage elephant intrusion, different actions are taken, including: <ul style="list-style-type: none"> • Digging and maintenance of trenches • Erection of fences • Use of barbed wire These are continually monitored as demonstrated by reports seen during the audit. For instance, the Elephant Trench Monitoring Map – Mouila Lot 1, GIS-Drone Department / Olam Lebamba, Syst. WGS 1984_UTM_32S.	Complied
7.1.2	Species referenced in the Global Invasive Species Database and CABI.org are not to be used in managed areas, unless plans to prevent and monitor their spread are implemented. - Minor compliance -	Species referenced in the Global Invasive Species Database and CABI.org are not used in the unit of certification	Complied

Criterion / Indicator		Assessment Findings	Compliance
7.1.3	<p>There is no use of fire for pest control unless in exceptional circumstances, i.e. where no other effective methods exist, and with prior approval of government authorities. [see guidance section for NI additional guidance for this process].</p> <p>- Minor compliance -</p>	<p>The unit of certification does not use fire in pest control or any other operations.</p>	Complied
<p>Criterion 7.2: Pesticides are used in ways that do not endanger health of workers, families, communities or the environment.</p>			
7.2.1	<p>(C) Justification of all pesticides used is demonstrated. Selective products and application methods that are specific to the target pest, weed or disease are prioritised.</p> <p>- Critical (Major) compliance -</p>	<p>OPG has developed Agriculture Policy Manuals Volume 1 and Volume 2 (of April 2013). According to Chapter 9 of the Manual titled Immature Maintenance and Ablation, pesticide use is specific to the target pest, weed or disease.</p> <p>Additionally, OPG keeps a record of pesticides and their specific uses as evidenced in Document Number: PRP-EN02, Issue No. 1; of 05/10/2017.</p> <p>Meanwhile, Chapter 15 of OPG agriculture manual covers Integrated Pest & Disease Management Practices. This chapter is further implemented for instance, through circulars for the treatment and management of specific pests such as the African palm weevil, as evidenced in OPG Agriculture Circular N.o.3, relating to Treatment and Management of <i>Rhynchophorus Phoenixis</i> (of 25/11/2017).</p>	Complied
7.2.2	<p>(C) Records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredients applied per ha and number of applications) are provided.</p> <p>- Critical (Major) compliance -</p>	<p>OPG has developed a master sheet titled (Health and Safety Form: Pesticides Active Ingredients Analysis per Ha, Document Number: PRP-EN02, Issue No. 1; of 05/10/2017</p> <p>Based on this sheet, records of pesticides use (including active ingredients used and their LD50, area treated, amount of active ingredient are kept by the agronomy department. The records for different estates including Lot 1 were seen during the audit.</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance
7.2.3	<p>(C) Any use of pesticides is minimised as part of a plan, eliminated where possible, in accordance with IPM plans.</p> <p>- Critical (Major) compliance -</p>	<p>Chapter 15 of OPG Agriculture Policy Manual covers Integrated Pest & Disease Management Practices.</p> <p>As part of the practices, OPG's approach is on the use of pesticides is to minimize or completely eliminate were possible.</p>	Complied
7.2.4	<p>There is no prophylactic use of pesticides, unless in exceptional circumstances, as identified in national best practice guidelines.</p> <p>- Minor compliance -</p>	<p>The unit of certification does not practice prophylactic use of pesticides.</p>	Complied
7.2.5	<p>Pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions, and paraquat, are not used, unless in exceptional circumstances, as validated by a due diligence process, or when authorised by government authorities for pest outbreaks.</p> <p>The due diligence refers to:</p> <ul style="list-style-type: none"> a) Judgment of the threat and verify why this is a major threat b) Why there is no other alternative which can be used c) Which process was applied to verify why there is no other less hazardous alternative d) What is the process to limit the negative impacts of the application e) Estimation of the timescale of the application and steps taken to limit application to the specific outbreak. <p>- Minor compliance -</p>	<p>No pesticides that are categorised as World Health Organisation Class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions are used by the unit of certification</p>	Complied
7.2.6	<p>(C) Pesticides are only handled, used or applied by persons who have completed the necessary training and are always applied in accordance with the product label. All precautions attached to the products are properly observed, applied, and understood by workers (see Criterion</p>	<p>Pesticides are only handled, used or applied by persons who have completed the necessary training as evidenced by training records for sprayers dates:</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance
	<p>3.6). Personnel applying pesticides must show evidence of regular updates on the knowledge about the activity they carry out.</p> <p>- Critical (Major) compliance -</p>	<ul style="list-style-type: none"> 05/10/2021 for Lot 1, Estate 1, content: types of products they are using, safety (PPE to wear), maintenance of equipment, techniques of spraying, Risk of contamination, Used PPE. (Training for workers of Contractor: Ukudze) 24/10/2021: Estate 1 for Olam workers. Same as above, including attendance sheet. <p>A training plan: Training Calendar 2021, for the whole of 2021 was seen during the audit and covers aspects of spraying and handling of chemicals. According to this plan, training are organised 4 times a year, i.e. 2 times every 6 months. Additionally, interviews with personnel applying chemicals revealed that they are versed with the activity they carry out.</p>	
7.2.7	<p>(C) Storage of all pesticides is in accordance with recognised best practices.</p> <p>- Critical (Major) compliance -</p>	<p>OPG has developed a Procedure for Storage and Handling of Agrochemical Products (Document Ref OPG-MLA-EHS-SOP-05 established on 01/10/2013; Version 2 of 01/10/201).</p> <p>Based on this, OPG keeps a list of all authorised fertilizers in Gabon (Liste de Pesticides autorises par le Comite des pesticides de l'AGASA), and their respective uses e.g.</p> <ol style="list-style-type: none"> 1. Aladin – phosphure d'Aluminium – insectide 2. Memento 20% WP – metsulohuron methyl – herbicide 3. Chlorophacinine bloc NU20 – chlorophacinone – rodenticide 4. Coga 80 WP – Mancozeb – fungicide <p>OPG equally keeps a list of all pesticides that are forbidden in Gabon (Listes des Pesticides Interdits par le Comite de Gestion des Pesticidess de l'AGASA). This is part of OPG due diligence to prevent the procurement of any forbidden pesticides</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance
7.2.8	All pesticide containers are properly disposed of and/or handled responsibly if used for storing or for the same purposes. - Minor compliance -	OPG has developed a Procedure for Storage and Handling of Agrochemical Products (Document Ref OPG-MLA-EHS-SOP-05 established on 01/10/2013; Version 2 of 01/10/201). This procedure equally covers aspects of handling empty pesticide containers. Interviews with staffs at storage sites revealed that they fully understand these procedures.	Complied
7.2.9	(C) Aerial spraying of pesticides is prohibited. - Critical (Major) compliance -	No aerial spraying is done by the unit of certification.	Complied
7.2.10	(C) Specific annual medical surveillance for pesticide operators, and documented action to treat related health conditions, is demonstrated. - Critical (Major) compliance -	Before any personnel is admitted to carry out spraying activity, an aptitude test, which constitutes a baseline blood and medical analysis, is conducted. Additionally, all personnel admitted to carry out spraying are subjected to a bi-annual medical surveillance. Levels of ACHE (acetylcholinesterase), and other physical parameters are controlled. All these are in line with OPG SOP N°13/SD-MC (0)/0820 of 21/08/2020 for annual medical surveillance for pesticide operators. Records of annual medical surveillance for selected sprayers were seen during the audit. For instance workers with the following matricule numbers and dates of annual surveillance: <ul style="list-style-type: none"> • 009365: 28/04/2021 and 26/10/2021 • 003907: 28/04/2021 and 26/10/2021 • 062563: 08/06/2021 and 20/10/2021 • 000834: 19/07/2021 and 25/10/2021 	Complied

Criterion / Indicator		Assessment Findings	Compliance
		Normal blood levels for ACHE range between 33 - 49.3 IU/g of hemoglobin. If results show levels higher than this, the staff is removed from the activity.	
7.2.11	<p>(C) No work with pesticides is undertaken by persons under the age of 18, pregnant or breastfeeding women or other people that have medical restrictions and they are offered alternative equivalent work.</p> <p>- Critical (Major) compliance -</p>	<p>Interviews with both administration and staffs revealed that persons under the age of 18, pregnant and breastfeeding women are not employed to carrying out spraying activities.</p> <p>Additionally, and as indicated in 7.2.10 above, persons that have medical restrictions and/or whose ACHE results are higher than normal are offered alternative equivalent work.</p>	Complied
Criterion 7.3: Waste is reduced, recycled, reused and disposed of in an environmentally and socially responsible manner.			
7.3.1	<p>A waste management plan which includes reduction, recycling, reusing, and disposal based on toxicity and hazardous characteristics, is documented and implemented.</p> <p>- Minor compliance -</p>	<p>OPG has developed a waste management plan (Plan de Gestion des Dechets, Ref. OPG-MLA-QEHS-PLM-01, of 01/02/2016. The plan establishes the different types of waste, segregation, storage, collection and treatment. The was reviewed in 2021 into Plan des Gestion des Dechets/Strategie et Procedure, Ref. Waste S1-M1.1-Specific Document on Waste Collection: Strategy and Procedure (draft 3). Workers at the waste collection/storage site are trained in waste segregation. Minutes of the training of 09/09/2021 alongside the list of participants was seen during the audit. (Report dated 13/09/2021, Minutes of Meeting – Waste Segregation), together with attendance sheets.</p> <p>Moreover, OPG has signed contracts with third parties for the collection and final elimination of different wastes. For instance, a voucher for 6,359 litres of waste oil from OPG Mouila, by Horizon Petro Products Sarl. Document Reference: HPPS/2021, of 10/05/2021. Attestation of treatment of the waste oil by heating</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance
		<p>and distillation (Certificat de Valorisation des Dechets no. 0008/2021).</p> <p>HSE Gabon collected 506.6Kg of medical waste on 25/10/2021. Attestation of destruction No. 0603 showing that the waste was treated by incineration, dated 29/10/2021.</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>OPG has put in place a system for collecting household waste consisting of collection bins with different colours: Red for glass, Blue for plastic waste and Green for biodegradable waste.</p> <p>OPG carries out sensitization campaigns across camps to educate workers on proper waste management, including waste separation. Reports of a sensitization campaign carried out from 7-22 June 2021, were viewed during the audit.</p> <p>At the clinic, we found biodegradable waste mixed with paper/cartons in the blue waste collection bin that is designated for bio. Additionally, at the residential area, we found that some waste types are not properly segregated according the bins indicating that some members of the workforce do not master the waste segregation system. An OFI is raised for further monitoring.</p>	OFI
7.3.3	<p>The unit of certification does not use open fire for waste disposal.</p> <p>- Minor compliance -</p>	<p>OPG has developed a fire management plan (document ref. DS-PRP.02 of 28/03/2020), which prohibits the use of fire.</p> <p>Additionally, field visits and interviews with workers did not reveal any use of fire in waste disposal.</p>	Complied
<p>Criterion 7.4: Practices maintain soil fertility at, or where possible improve soil fertility to, a level that ensures optimal and sustained yield.</p>			

Criterion / Indicator		Assessment Findings	Compliance
7.4.1	<p>Good agricultural practices, as contained in SOPs, are followed to manage soil fertility to optimise yield and minimise environmental impacts.</p> <p>- Minor compliance -</p>	<p>Olam Palm Gabon has developed good agricultural policies as described in Agricultural Policy Manuals (Volume 1 and Volume 2). Chapter 6 (volume 1) specifically addresses methods of conserving soils and water.</p> <p>Additionally, OPG has developed several SOPs e.g.:</p> <ul style="list-style-type: none"> • Standard Operating Procedure for Manuring (version 1 of 2016) • Standard Operating Procedures for Oil Palm Replanting (version 1 of 2016) • Standard Operating Procedure for Spraying (version 1 of 2016) • Standard Operating Procedure for Oil Palm Fruit Grading (version 1 of 2016) • Standard Operating Procedure for Harvesting Oil Palm (version 1 of 2016). <p>Proper implementation of this SOPs is evidenced in activity reports and contributes to soil fertility to optimise yields while minimising environmental impacts. For instance, field observations saw lining of palm fronds and application of EFB. Additionally, interviews with sprayers revealed that they do not spray close to water bodies.</p>	Complied
7.4.2	<p>Periodic tissue and soil sampling is carried out by Companies to monitor and manage changes in soil fertility and plant health.</p> <p>- Minor compliance -</p>	<p>Soil surveys are conducted every 5 years. The report was viewed during the audit: Report of Soil Types Fertility Assessment in Mouila – Lot 1- Olam Palm Gabon. Prepared by Lot 1 Agronomy Team (November 2020). Additionally, soil sampling is done annually. The most recent report (dated March 2020) was viewed during the audit.</p>	Complied

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

Criterion / Indicator	Assessment Findings	Compliance
	<p>Other sampling exercises are carried out to ascertain soil and plant health. For instance, 5th Report, Annual Agronomic report "Palm Status, Leaf Nutrient Survey, Soil Fertility Study, Crop Productivity, OER, KER, Audit Results and 2021 Fertilizer recommendations"; Prepared by Mouila Agronomy/R&D Team (December 2020).</p> <p>Meanwhile, periodic tissue sampling is conducted as evidenced in Field Observation Report: Leaf Sampling Exercise Mouila – Lot 1; Prepared by Lot 1 Agronomy team (April 2021); conducted from 25 January – 29 March 2021, samples collected in 14,834ha (705 blocks) of all 6 estates. These sampling exercises help OPG to track and manage changes in soil fertility and plant health.</p>	
<p>7.4.3</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 fertilisers.</p> <p>- Minor compliance -</p> <p>Chapter 7 of OPG Agriculture Policy Manual Volume 1 (of April 2013), on: Fertilizing Programme for Nursery, Immature and Mature Plantings, clearly states that the nutrient recycling strategy includes the use of Empty Fruit Bunches (EFB). Field visits showed that EFB are applied in all 3 estates. Meanwhile, agronomic data showed that more EFB are applied in Estate 3 because of proximity to mill. Applications from June-September show:</p> <ul style="list-style-type: none"> • Estate 1: 1,200MT (furthest from mill) • Estate 2: 3,200MT • Estate 3: 5,200MT <p>EFB heaps were seen in fields for application, and interviews with staff confirmed that they can be applied any time of the year.</p> <p>POME is mostly applied in Estate 6.</p>	<p>Complied</p>

Criterion / Indicator		Assessment Findings	Compliance
7.4.4	Records of fertiliser inputs are maintained. - Minor compliance -	Fertilizer inputs are based on recommendations of the agronomic department following the results of the different soil and tissues sampling. The records are maintained and include: year of planting, leaf and soil analysis, recommendations for application, dosage applied per palm, type of fertilizer.	Complied
Criterion 7.5: Practices minimise and control erosion and degradation of soils.			
7.5.1	(C) Practices minimise and control erosion and degradation of soils. - Critical (Major) compliance -	Chapter 6 of OPG Agriculture Policy Manual covers: Soil and Water Conservation. Practices to minimise and control erosion and degradation of soils include EFB application and cover crop planting (<i>Pueraria javanica</i>).	Complied
7.5.2	There is no extensive replanting of oil palm on steep terrain. - Minor compliance -	No steep terrain is present within the unit of certification, as evidenced in soil surveys and soil maps conducted by PARAM AGRICLULTURAL SOIL SURVEYS (M) SDN. BHD (October 2018). According to this study, the major soil type identified is Haplic Nitisol (based on UNESCO soil map)	Complied
7.5.3	There is no new planting of oil palm on steep terrain. - Minor compliance -	Same as 7.5.2 above	Complied
Criterion 7.6: Soil surveys and topographic information are used for site planning in the establishment of new plantings, and the results are incorporated into plans and operations.			
7.6.1	(C) To demonstrate the long-term suitability of land for oil palm cultivation, soil maps or soil surveys identifying marginal and fragile soils, including steep terrain, are taken into account in plans and operations. - Critical (Major) compliance -	OPG commissioned a soil analysis which was conducted by PARAM AGRICLULTURAL SOIL SURVEYS (M) SDN. BHD (October 2018). According to this study, the major soil type identified is Haplic Nitisol (based on UNESCO soil map). This report did not identify any fragile, marginal, or peat soil within plantation.	Complied

Criterion / Indicator		Assessment Findings	Compliance
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 -	No fragile or marginal soils exist with the concession area.	Complied
7.6.3	Soil surveys and topographic information guide the planning of drainage and irrigation systems, roads and other infrastructure. - Minor compliance -	OPG commissioned a soil analysis which was conducted by PARAM AGRICULTURAL SOIL SURVEYS (M) SDN. BHD (October 2018). This study did not find any fragile, marginal or peat soils. The study revealed that most of the area within the Mouila concession is generally flat, with no high elevations or steep slopes. Topographic information is used to guide all road maintenance activities as evidenced in Road Map Estate 1 – Mouila Lot 1 (GIS-Drone Department/Olam Lebamba; Syst. WGS_1084_UTM_Zone_32S, of 40/10/2021). OPG’s road maintenance program includes the distribution of gravel stones, grading and compacting and construction of gutters to prevent erosion.	Complied
Criterion 7.7: No new planting on peat, regardless of depth after 15 November 2018 and all peatlands are managed responsibly.			
7.7.1	(C) There is no new planting on peat regardless of depth after 15 November 2018 in existing and new development areas. - Critical (Major) compliance -	N/A. No peat soils were identified in the concession area.	Not Applicable
7.7.2	Areas of peat within the managed areas are inventoried, documented and reported (effective from 15 November 2018) to RSPO Secretariat. PROCEDURAL NOTE: Maps and other documentation of peat soils are provided, prepared and shared in line with RSPO Peatland Working Group (PLWG) audit guidance (see Procedural Note for 7.7.5 below).	Same as 7.7.1 above	Not Applicable

Criterion / Indicator		Assessment Findings	Compliance
	- Minor compliance -		
7.7.3	(C) Subsidence of peat is monitored, documented and minimised. - Critical (Major) compliance -	Same as 7.7.1 above	Not Applicable
7.7.4	(C) A documented water and ground cover management programme is in place. - Critical (Major) compliance -	Same as 7.7.1 above	Not Applicable
7.7.5	(C) For plantations planted on peat, drainability assessments are conducted following the RSPO Drainability Assessment Procedure, or other RSPO recognised methods, at least five years prior to replanting. The assessment result is used to set the timeframe for future replanting, as well as for phasing out of oil palm cultivation at least 40 years, or two cycles, whichever is greater, before reaching the natural gravity drainability limit for peat. When oil palm is phased out, it is replaced with crops suitable for a higher water table (paludiculture) or rehabilitated with natural vegetation. PROCEDURAL NOTE: Full details of the RSPO Drainability Assessment Guidelines and related concepts and detailed actions are in the manual currently being fine-tuned/tested by PLWG. A final version should be approved by PLWG in January 2019 and will include additional guidance on the steps to be followed after the decision not to replant as well as implications for other stakeholders, smallholders, local communities and the unit of certification. It is recommended that a further twelve-month methodology trial period is proposed for all related management units (i.e. those with plantations on peat) to utilise the methodology and provide feedback to the PLWG to enable further refinement of procedure as appropriate before January 2020. Units of certification have the option to defer	Same as 7.7.1 above	Not Applicable

Criterion / Indicator		Assessment Findings	Compliance
	<p>replanting till after the availability of the revised guidelines. Additional guidance on alternative crops and rehabilitation of natural vegetation will be provided by PLWG.</p> <p>PROCEDURAL NOTE: PLWG and the Smallholder Interim Group (SHIG) will collaboratively develop guidance for Independent Smallholders [cross links to SHIG and GHG issues].</p> <p>- Critical (Major) compliance -</p>		
7.7.6	<p>(C) All existing plantings on peat are managed according to the 'RSPO Manual on Best Management Practices (BMPs) for existing oil palm cultivation on peat', version 2 (2018) and associated audit guidance.</p> <p>- Critical (Major) compliance -</p>	Same as 7.7.1 above	Not Applicable
7.7.7	<p>(C) All areas of unplanted and set-aside peatlands in the managed area (regardless of depth) are protected as "peatland conservation areas"; new drainage, road building and power lines by the unit of certification on peat soils is prohibited; peatlands are managed in accordance with the 'RSPO BMPs for Management and Rehabilitation of Natural Vegetation Associated with Oil Palm Cultivation on Peat', version 2 (2018) and associated audit guidance.</p> <p>- Critical (Major) compliance -</p>	Same as 7.7.1 above	Not Applicable
Criterion 7.8: Practices maintain the quality and availability of surface and groundwater.			
7.8.1	<p>A water management plan is in place and implemented to promote more efficient use and continued availability of water sources and to avoid negative impacts on other users in the catchment. The plan addresses the following:</p>	<p>Olam Palm Gabon has developed a water management plan titled: Sustainable Water Management Plan – Mouila Lot 1 Plantation (Document Reference PLAN MLA/CRS_WMP/0219, Revision 01, of 14/12/2019). This plan was viewed at the time of the audit.</p> <ul style="list-style-type: none"> Annex A of water management plan outlines the 	OFI

Criterion / Indicator	Assessment Findings	Compliance
<p>a) The unit of certification does not restrict access to clean water or contribute to pollution of water used by communities.</p> <p>b) Workers have adequate access to clean water.</p> <p>- Minor compliance -</p>	<p>parameters and frequency for drinking water testing</p> <ul style="list-style-type: none"> • Annex B outlines the parameters and frequency for surface water testing • Annex C sets parameters and frequency for POME testing • Annex D shows a map of water sampling points. <p>As part of the management plan and to ensure that water is effectively protected, the unit of certification conducts analysis on both surface water and drinking water. To do this, water sampling points have been identified across the plantation, from where samples are collected and analysed.</p> <p>Analysis of water for consumption in camps is done monthly: Conducted by Olam Lebamba Analytical Services Laboratory. Monthly reports were seen during the audit:</p> <p>June report: issued on 25 June 2021 (pH: 7.2, normal:6.5-8.5; turbidity: 7.6; normal: 5)</p> <p>July Report: issued 25 July 2021: pH: 7.6; normal: 6.5-8.5; turbidity:1 normal: 5)</p> <p>Reports for surface water analyses were seen during the audit (Rapport D'Analyse Eaux de Surface (No. 4-534-2021AEOPG/Mouila LOT 1).</p> <p>OPG workers have adequate access to clean water. To ensure good quality water, analyses of water for consumption in housing units is</p>	

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

Criterion / Indicator		Assessment Findings	Compliance
		done on a monthly basis. Analyses of water for consumption are conducted by Olam Lebamba Analytical Services Laboratory. Reports of water analyses up to the month of October 2021 were reviewed during the audit. However, the turbidity for the successive months August to October were above limits. An observation is raised to follow-up.	
7.8.2	<p>(C) Water courses and wetlands are protected, including maintaining and restoring appropriate riparian and other buffer zones in line with 'RSPO Manual on BMPs for the management and rehabilitation of riparian reserves' (April 2017).</p> <p>- Critical (Major) compliance -</p>	<p>The unit of certification has developed a water Management plan titled: Plan de Gestion des Eaux de la Plantation de Mouila Lot 1 – Olam Palm Gabon (Sustainable Water Management Plan – Mouila Lot 1 Plantation (Document Reference PLAN MLA/CRS_WMP/0219, Revision 01, of 14/12/2019).</p> <p>This plan sets out the activities aimed at monitoring the quality of surface waters including rivers, wetlands and buffer zone, best agricultural practices, etc.</p> <p>Reports of monitoring of wetlands and riparian zones are included in HCV monthly monitoring reports, such as (Rapport Mensuel SMART Mouila Lot 1; Period September-October 2021, Report No. 10-11/2021).</p> <p>Additionally, other activities aimed at protecting riparian zones include the installation of signboards to show riparian zones, as sighted during field visits.</p>	Complied
7.8.3	<p>Mill effluent is treated to be in compliance with national regulations. Discharge quality of mill effluent, especially Biochemical Oxygen Demand (BOD), is regularly monitored.</p> <p>- Minor compliance -</p>	<p>OPG has contracted the services of Cabinet d'Expertise et Conseil Pro-Training & Co SARL to analyse its mill effluent. The report of the analysis was seen during the audit. (Rapport d'Analyse Physicochimie Eaux Effluents No. 1-010-2021/AEOPG/ML1 of 27/09/2021.</p> <p>The report showed that results including BOD are within the legally established limits (set at 6500mg/l).</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance
7.8.4	Mill water use per tonne of FFB is monitored and recorded. - Minor compliance -	<p>OPG monitors and records mill water use per tonne of FFB as evidenced by Mouila Lot 1 Plantation and Bilala POM Year 2021 Records.</p> <p>The records show quantity of FFB, water consumption, water consumption ratio, etc.</p> <p>To achieve this, OPG records quantities of water used on a daily basis: Daily Process Log sheet, and summarises on a monthly basis.</p> <p>The report titled: Water Usage Monitoring: Mouila Lot 1 Plantation and Bilala POM Year 2021, shows quantity of FFB, water consumption, water consumption ratio for Jan-September 2021. Records show an average consumption ratio of 0.93/tonne of FFB for this period.</p>	Complied
Criterion 7.9: Efficiency of fossil fuel use and the use of renewable energy is optimised			
7.9.1	A plan for improving efficiency of the use of fossil fuels and to optimise renewable energy is in place, monitored and reported. - Minor compliance -	<p>This is included in OPG Continuous Improvement Plan.</p> <p>OPG monitors fossil fuel use by type: diesel, fibre, shell, percentage reduction, etc. Data for 2021 were seen during the audit as evidenced by (Efficiency of Fossil Fuel Use: Bilala POM – Mouila Plantations, 2021). The records show: Diesel/CPO/MT, Fibre+Shell/CPO/MT, etc. OPG records quantities of energy used on a daily basis: Daily Process Report (Daily Process Logsheet), and summarises on a monthly basis. A comparative analysis of different energy sources is done, e.g., Genset vs. fibre.</p> <p>Reduction of GHG is presented in the Continuous Improvement plan (April 2019), e.g. their quotas for use of vehicle fuels: control of vehicle engines to ensure efficiency. There are plans for methane capture, i.e. biogas plant to be established.</p> <p>There is use of fibre and cork at the mill for sterilization.</p>	Complied

Criterion / Indicator	Assessment Findings	Compliance	
Criterion 7.10: Plans to reduce pollution and emissions, including greenhouse gases (GHG), are developed, implemented and monitored and new developments are designed to minimise GHG emissions.			
7.10.1	<p>(C) GHG emissions are identified and assessed for the unit of certification. Plans to reduce or minimise them are implemented, monitored through the Palm GHG calculator and publicly reported.</p> <p>- Critical (Major) compliance -</p>	<p>OPG has identified all its GHG sources and reports them publicly on Palm GHG. The 2020 Summary was seen at the time of the audit (Usine Olam Mouila Lot 1 Site Bilala Oil Mill – 2020 Summary). The summary includes, summary emissions, mill emission credits, estate/plantation field emissions and sinks (own, group and 3rd party).</p> <p>Reduction of GHG is presented in the Continuous Improvement Plan (April 2019), and actions taken to reduce GHG emissions include, implementation of quotas for use of vehicle fuels, and regular control/maintenance of vehicle engines to ensure efficiency. Additionally, interviews with the Sustainability Manager revealed that OPG has plans for methane capture (i.e. biogas plant to be established). There equally is use of fibre and cork at the mill for sterilization</p>	<p>Complied</p>
7.10.2	<p>(C) Starting 2014, the carbon stock of the proposed development area and major potential sources of emissions that may result directly from the development are estimated and a plan to minimise them prepared and implemented (following the RSPO GHG Assessment Procedure for New Development).</p> <p>- Critical (Major) compliance -</p>	<p>Does not apply for Lot 1 because the area was developed/planted in 2013</p>	<p>Not Applicable</p>
7.10.3	<p>(C) Other significant pollutants are identified and plans to reduce or minimise them implemented and monitored.</p> <p>- Critical (Major) compliance -</p>	<p>As already indicated in 7.10.1 above, OPG GHG calculation captures all significant pollutants. All significant pollutants, including POME, are regularly monitored.</p>	<p>Complied</p>
Criterion 7.11: Fire is not used for preparing land and is prevented in the managed area			

Criterion / Indicator		Assessment Findings	Compliance
7.11.1	<p>(C) Land for new planting or replanting is not prepared by burning.</p> <p>- Critical (Major) compliance -</p>	<p>According to Volume 1, Chapter 2, Section 2.5 of OPG Agriculture Policy Manual, the use of fire for land preparation is firmly prohibited.</p> <p>No new planting or replanting is ongoing within the concession area. Moreover, interviews with local populations, workers and our own field observations did not reveal any use of fire by OPG.</p>	Complied
7.11.2	<p>The unit of certification establishes fire prevention and control measures for the areas directly managed by the unit of certification.</p> <p>- Minor compliance -</p>	<p>OPG has developed a fire prevention plan (document ref. DS-PRP.01; of 05/05/2017). The plan presents a blueprint for planning actions aimed at managing fire hazards if and when they occur in the plantations. The plan guides workers to prevent fires, and to avoid losses, and threats to life and damage to property resulting from fire when they occur.</p> <p>Fire prevention training is organised for workers, while sensitization campaigns are organised for riparian communities.</p>	Complied
7.11.3	<p>The unit of certification engages with adjacent stakeholders on fire prevention and control measures.</p> <p>- Minor compliance -</p>	<p>OPG engages local communities in its effort to prevent and control fires. This takes the form of fire sensitization campaigns for riparian communities, as evidenced by activities from 4th-18th November 2021, covering: Guidouma, Mboukou, Guiamba, St. Martin, Rembo, and Doubou.</p>	Complied
<p>Criterion 7.12: Land clearing does not cause deforestation or damage any area required to protect or enhance High Conservation Values (HCVs) or High Carbon Stock (HCS) forest. HCVs and HCS forests in the managed area are identified and protected or enhanced.</p>			
7.12.1	<p>(C) Land clearing since November 2005 has not damaged primary forest or any area required to protect or enhance HCVs. Land clearing since 15 November 2018 has not damaged HCVs or HCS forests.</p> <p>A historic Land Use Change Analysis (LUCA) is conducted prior to any new land clearing, in accordance with the RSPO LUCA guidance document.</p>	<p>OPG conducted an independent HCV assessment (HCV Assessment Olam Palm Gabon, 33.354 Ha Concession North of Mouila, Final Version May 2012). The study was conducted by Proforest.</p> <p>Additionally, OPG has not carried out any land clearing in OPG Mouila Lot 1 since 15 November 2018. All planting for OPG Mouila</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance
	- Critical (Major) compliance -	has undergone New Planting Procedure with notification on the RSPO website.	
7.12.2	<p>(C) HCVs, HCS forests and other conservation areas are identified as follows</p> <p>a) For existing plantations with an HCV assessment conducted by an RSPO-approved assessor and no new land clearing after 15 November 2018, the current HCV assessment of those plantations remains valid</p> <p>b) Any new land clearing (in existing plantations or new plantings) after 15 November 2018 is preceded by an HCV-HCS assessment, using the HCSA Toolkit and the HCV-HCSA Assessment Manual. This will include stakeholder consultation and take into account wider landscape-level considerations.</p> <p>PROCEDURAL NOTE: For details of transitional measures, refer to Annex 5: RSPO transition from HCV assessments to HCV-HCSA assessments.</p> <p>- Critical (Major) compliance -</p>	<p>Olam Palm Gabon has no new planting 15 November 2018. However, OPG conducted an independent HCV assessment (HCV Assessment Olam Palm Gabon, 33.354 Ha Concession North of Mouila, Final Version May 2012). The study was conducted by Proforest.</p>	Complied
7.12.3	<p>In High Forest Cover Landscapes (HFCLs) within HFCCs, a specific procedure will apply for legacy cases and development by indigenous peoples and local communities with legal or customary rights, taking into consideration regional and national multi-stakeholder processes. Until this procedure is developed and endorsed, 7.12.2 applies.</p> <p>PROCEDURAL NOTE: There should be demonstrable benefits to the local community; clear recognition of legal and customary lands based on participatory land use planning; development should be proportional to the needs of the local community; with a balance between conservation and development. This procedure will also cover planting on previous or abandoned agricultural</p>	<p>No new plantings have been carried out by OPG in Mouila Lot 1 since 15 November 2018. All planted area has been subjected to the RSPO New Planting Procedure with public notification on the RSPO website.</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance
	land / plantations. All other P&C requirements apply, including FPIC and HCV requirements. - Minor compliance -		
7.12.4	(C) Where HCVs, HCS forests after 15 November 2018, peatland and other conservation areas have been identified, they are protected and/or enhanced. An integrated management plan to protect and/or enhance HCVs, HCS forests, peatland and other conservation areas is developed, implemented and adapted where necessary, and contains monitoring requirements. The integrated management plan is reviewed at least once every five years. The integrated management plan is developed in consultation with relevant stakeholders and includes the directly managed area and any relevant wider landscape level considerations (where these are identified). - Critical (Major) compliance -	Olam Palm Gabon has no new planting since 15 November 2018. However, OPG conducted an independent HCV assessment (HCV Assessment Olam Palm Gabon, 33.354 Ha Concession North of Mouila, Final Version May 2012). The study was conducted by Proforest. According to the HCV assessment, no peat Soils were found. However, the study found HCV 1, 3, 4, 5 and 6 were in the concession area. Based on the HCV assessment, Olam Palm Gabon has developed an HCV management plan (Plan de Gestion des HVC Olam Palm Gabon Plantation de Mouila Lot 1, Reference: No. 01/HVC PLAN/0620, of 06/2020). The plan outlines the different HCVs identified, the risks faced, management measures, and indicators for monitoring. The HCV management plan shows that different stakeholders including local communities were duly consulted.	Complied
7.12.5	Where rights of local communities have been identified in HCV areas, HCS forest after 15 November 2018, peatland and other conservation areas, there is no reduction of these rights without evidence of a negotiated agreement, obtained through FPIC, encouraging their involvement in the maintenance and management of these conservation areas. - Minor compliance -	According to the HCV assessment conducted by Proforest and cited above, social HCVs including HCV 5 and HCV 6 were identified in the concession area. The HCV management plan shows that different stakeholders including local communities were duly consulted. Consultations with communities as well as government officials during the period of the audit confirmed that they were consulted during the HCV assessment and the development of the HCV management plan. Additionally, communities confirmed that OPG does not prevent them from accessing the social HCVs.	Complied

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

Criterion / Indicator		Assessment Findings	Compliance
		OPG monitors HCV, except for those that constitute sacred sites for communities. OPG carries out sensitization activities on HCV and bush meat consumption as evidenced by the report of sensitization in Lot 1, together with attendance sheets (12-25/08/2021).	
7.12.6	<p>All rare, threatened or endangered (RTE) species are protected, whether or not they are identified in an HCV assessment.</p> <p>A programme to regularly educate the workforce about the status of RTE species is in place. Appropriate disciplinary measures are taken and documented in accordance with company rules and national law if any individual working for the company is found to capture, harm, collect, trade, possess or kill these species.</p> <p>- Minor compliance -</p>	<p>Based on the HCV management plan, monthly field visits are undertaken by the Olam HCV unit to monitor the state of the HCVs. Monitoring reports (Rapport Mensuel SMART Mouila Lot 1) for 2021 were seen during the audit:</p> <ul style="list-style-type: none"> • Period 01-30 June 2021: No. 06/2021 • Period 01-31 July 2021: No. 07/2021 • Period 01-31 August 2021: No. 08/2021 • Period September and October 2021 <p>The reports highlight sightings of different species, human signs, observations, etc.</p> <p>Camera traps are used for monitoring, results are collected twice a year in 3 months interval (dry season and rainy season).</p> <p>When illegal logging activities are identified during the monitoring, Olam reports to the Regional Director in-charge of Forests, who in turn organises a field mission to inspect the scene. After this mission a report is prepared and shared with Olam. The report of 01/10/2021 was seen during the audit (No. 027/MEFMECPCPAT/SG/DPNG</p> <p>Additionally, Olam PG carries out 3 sensitization activities on HCV and bush meat consumption (3 times a year for every Lot and its corresponding estates). The report of sensitization in Lot 1, together</p>	Complied

RSPO P&C Public Summary Report
Revision 12 (Jun 2021)

Criterion / Indicator		Assessment Findings	Compliance
		with attendance sheets (12-25/08/2021) was seen during the audit, for all of Lot 1 and its estates.	
7.12.7	<p>The status of HCVs, HCS forests after 15 November 2018, other natural ecosystems, peatland conservation areas and RTE species is monitored. Outcomes of this monitoring are fed back into the management plan.</p> <p>- Minor compliance -</p>	<p>Based on the HCV management plan, monthly field visits are undertaken by the Olam HCV unit to monitor the state of the HCVs. OPG monitors all HCVs, and RTEs using the SMART application. Daily monitoring activities, including sighting of RTEs and other species. These daily activities are consolidated to produce weekly, monthly and annual reports as evidenced by:</p> <p>Monitoring reports (Rapport Mensuel SMART Mouila Lot 1):</p> <ul style="list-style-type: none"> • Period 01-30 June 2021: No. 06/2021 • Period 01-31 July 2021: No. 07/2021 • Period 01-31 August 2021: No. 08/2021 • Period September and October 2021 <p>The reports highlight sightings of different species, human signs, observations, etc.</p> <p>Camera traps are used for monitoring, results are collected twice a year in 3 months interval (dry season and rainy season).</p> <p>Interviews with OPG HCV team revealed that these results are used to prepare and implement further monitoring plans and activities as evidenced in the recent review of Elephant Control Strategy titled> Olam Palm Gabon – Elephant Control, Reviewed Strategy to Effectively address crop destruction, Version 6, February 2021).</p>	Complied
7.12.8	<p>(C) Where there has been land clearing without prior HCV assessment since November 2005, or without prior HCV- HCSA assessment since 15</p>	<p>As already mentioned in 7.12.2 above, no new land clearing was carried out by OPG since 15 November 2018. Additionally, all new</p>	Complied

Criterion / Indicator		Assessment Findings	Compliance
	November 2018, the Remediation and Compensation Procedure (RaCP) applies. - Critical (Major) compliance -	plantings preceded 15 November 2018 and were subjected to HCV assessment and NPP.	

Appendix B: GHG Reporting Executive Summary

The GHG emissions that were produced in **2020** for **BILALA 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, PKO Produced and FFB Processed
- iv. Fertilizer consumed data for both estates and smallholders.

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

Emission per product	tCO ₂ e/tProduct
CPO	-11.59
PKO	-17.94

Extraction	%
OER	24.24
KER	4.06

Production	t/yr
FFB Process	197162.52
CPO Produced	47793.28
PKO Produced	2 222.32

Land Use	Ha
OP Planted Area	50748.95
OP Planted on peat	0
Conservation (forested)	60600
Conservation (non-forested)	0
Total	11348.95

Summary of Field Emission and Sink

	Own Crop*		Group		3 rd Party		Total	
	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB	tCO ₂ e	tCO ₂ e / FFB
Emission								
Land Conversion	106733.41	0.83	199410.29	2.94	0	0	306143.70	3.77
CO ₂ Emission from fertilizer	2616.00	0.02	4669.82	0.07	0	0	7285.82	0.09
NO ₂ Emission	1274.87	0.01	2752.14	0.04	0	0	4027.00	0.05
Fuel Consumption	7539.00	0.06	5409.31	0.08	0	0	12948.31	0.14
Peat Oxidation	0.00	0.00	0.00	0.00	0	0	0	0
Sink								
Crop Sequestration	-148686.31	-1.15	-326323.86	-4.81	0	0	-475010.00	-5.96
Conservation Sequestration	-161975.32	-1.25	-373728.68	-5.51	0	0	-535704.00	-6.76
Total	-192498.36	-1.49	-487810.98	-7.19	0	0	-680309.34	-8.68

**Note: Includes both estates and smallholders*

Summary of Mill Emission and Credit

	tCO ₂ e	tCO ₂ e/tFFB
Emission		
POME	33195.96	0.17
Fuel Consumption	284.12	0.00
Grid Electricity Utilization	0.00	0.00
Credit		
Export of Grid Electricity	0.00	0.00
Sales of PKS	0.00	0.00
Sales of EFB	0.00	0.00
Total	33480.08	0.17

Summary of Kernel Crusher Emission and Credit

Emissions	tCO₂e
PK from own mill	-92845.74
PK from other source	0.00
Fuel Consumptions	284.12
Total Crusher emissions	-92561.62

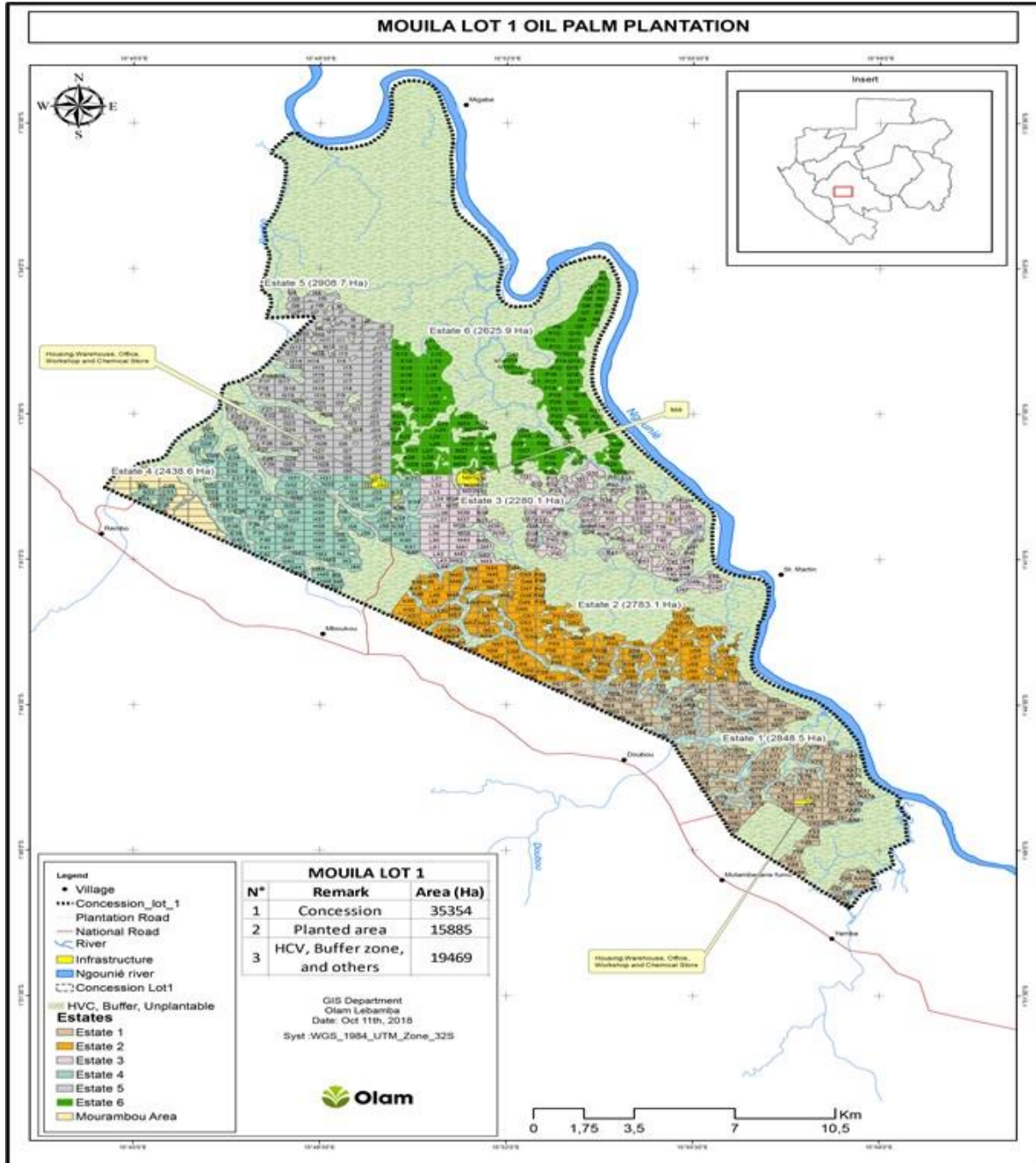
Palm Oil Mill Effluent (POME) Treatment:	
Divert to Compost (%)	0
Divert to anaerobic diversion (%)	100

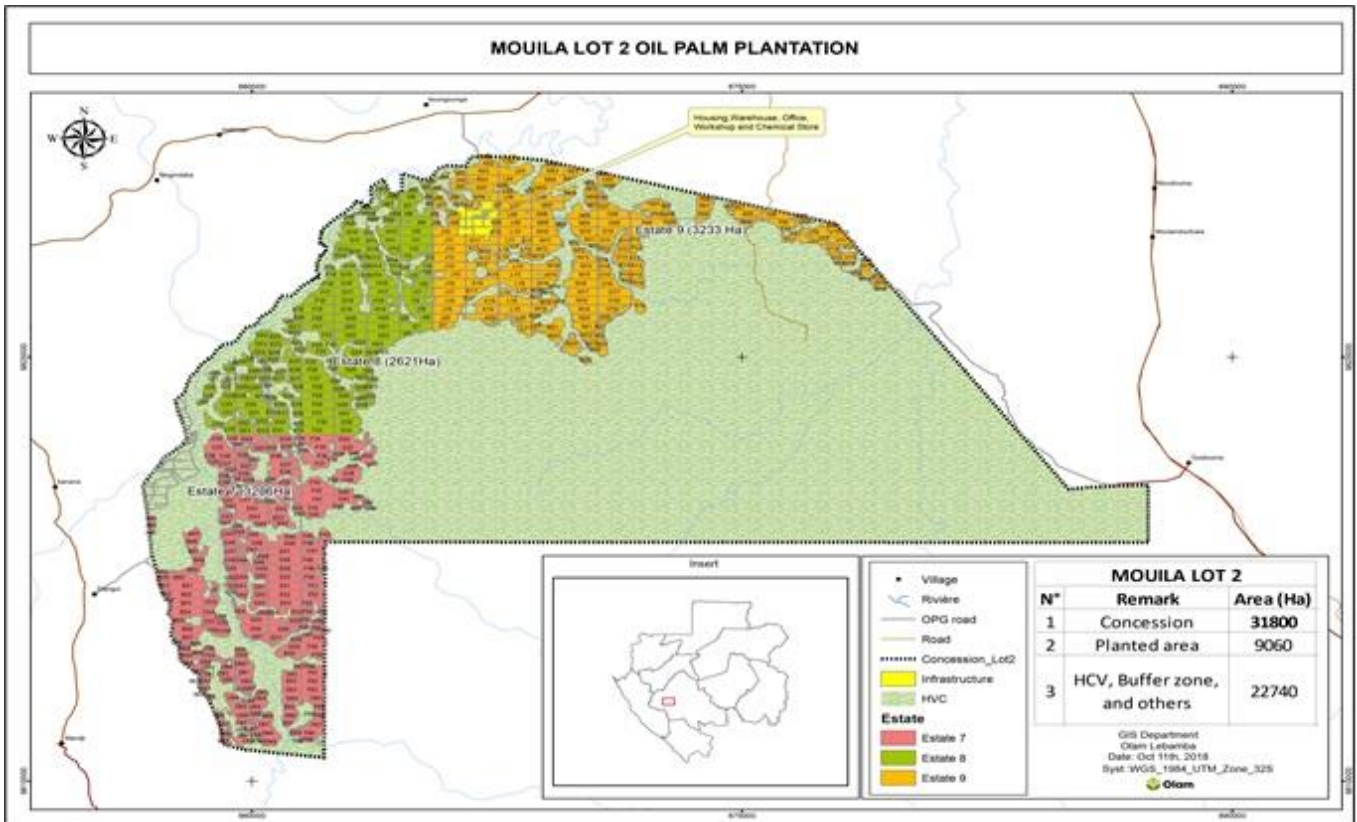
POME Diverted to Anaerobic Digestion:	
Divert to anaerobic pond (%)	100
Divert to methane captured (flaring) (%)	0
Divert to methane captured (energy generation) (%)	0

Appendix C: Location Map of Certification Unit and Supply bases



Appendix D: Estate Field Map





Appendix F: List of Abbreviations

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