### Interholco AG

**Timber and pulp assessment**

<table>
<thead>
<tr>
<th><strong>Total score:</strong></th>
<th>94.7%</th>
</tr>
</thead>
</table>

**Latest update:** July 2019  
**Next scheduled:** July 2020

**About this company:**  
With its headquarters in Switzerland, the INTERHOLCO Holding company (owned by Danzer) was founded in 1962 and holds a forest concession in the Republic of Congo. The company is involved in timber production, processing, manufacturing, trading and distribution.

**Parent company:** Danzer Group

**Landbank:** 801,716 hectares

**Thomson Reuters ticker:** Private company

**Bloomberg ticker:** Private company

**Activities:** Timber production, timber processing and manufacturing, trading and distribution

**Locations:** Republic of Congo

**Headquarters:** Switzerland


**Website:** [http://www.interholco.com](http://www.interholco.com)

**Sustainability report (2017)**

**Thomson Reuters ticker:** Private company  
**Bloomberg ticker:** Private company

<table>
<thead>
<tr>
<th><strong>Total:</strong></th>
<th>107 / 113</th>
<th>94.7%</th>
</tr>
</thead>
</table>

#### Sustainability policy and leadership

9 / 9  
100%

<table>
<thead>
<tr>
<th><strong>Indicator</strong></th>
<th><strong>Score</strong></th>
<th><strong>Source</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Sustainable forestry policy or commitment for all its operations?</td>
<td>✓ 1 / 1</td>
<td>Source</td>
</tr>
<tr>
<td>2. Sustainability policy or commitment applies to all sourcing?</td>
<td>✓ 1 / 1</td>
<td>Source</td>
</tr>
<tr>
<td>3. High-level position of responsibility for sustainability?</td>
<td>✓ 1 / 1</td>
<td>Source</td>
</tr>
<tr>
<td>Head of Sustainability</td>
<td></td>
<td></td>
</tr>
<tr>
<td>4. One or more board members have responsibility for sustainability?</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
This indicator is disabled as the company is not publicly listed |
| 5. Percentage or number of women board members? | |  
This indicator is disabled as the company is not publicly listed |
| 6. Percentage or number of women in senior management team? | ✓ 1 / 1 | Source |
| 0 (0%) - The company reports having no women in a Senior Management position in 2018 | |
| 7. Sustainability report published within last two years? | ✓ 1 / 1 | Source |
| 2,017 | |
8. Member of multiple industry schemes or other external initiatives to improve forest management or transparency?
FSC, ATIBT, Congo Basin Forest Partnership (CBFP), European Coalition for Sustainable Tropical Timber (STTC)

9. Activities with government, NGOs or academic institutions to improve the sustainability of forest products?
Project on finding alternatives to bushmeat with WCS, Working Group with scientists and NGOs on the effects of extreme weather events on Marantaceae forests, study on social impacts of FSC certification with WWF

10. Climate risks assessment available?

11. Natural capital assessment available?

12. Lists countries and operations?
Republic of Congo – forest concessions and sawmill

13. Total area of natural forest designated for wood/wood fibre production (ha)?
801,716 - The company refers to "production area"

14. Total area of forest plantation (ha)?
This indicator is disabled as the company has informed ZSL that it only produces wood/wood fibre from natural forests

15. Area of plantation/natural forest within outgrower schemes (ha)?
This indicator is disabled as the company has informed ZSL that it doesn't use outgrower schemes for wood/wood fibre production

16. Unplanted (areas designated for future development as plantation forest) (ha)?
This indicator is disabled as the company has informed ZSL that it only produces wood/wood fibre from natural forests

17. Conservation set-aside and/or HCV area (ha)?
308,000 - Sum of protection area (220,000 ha) and conservation area (88,000 ha)

18. Area of Intact Forest Landscape (ha)?
530,000 - Data as of 01 January 2017

19. Number of Forest Management Units (FMUs)?
1

20. Maps of forest management units (FMUs)?
The company's Ngombe concession, under the company IFO, is hosted on WRI Global Forest Watch and is also given in its 
FSC certification reports

### 21. Forest management plans available for all FMUs?
- **Score:** 1/1  
  **Source:**

### 22. Monitoring of forest management plan implementation?
- **Score:** 1/1  
  **Source:**

### 23. Company has provided valid legal documents to Open Timber Portal on use rights (at the time of SPOTT assessments)?
- **Score:** 100%  
  **Source:**

Please note: Company scores on Open Timber Portal are updated daily. Visit the OTP website to review the company's current performance by clicking on the source link

### 24. Company has provided valid legal documents to Open Timber Portal on forest management (at the time of SPOTT assessments)?
- **Score:** 80%  
  **Source:**

Please note: Company scores on Open Timber Portal are updated daily. Visit the OTP website to review the company's current performance by clicking on the source link

### 25. Company has provided valid legal documents to Open Timber Portal on timber harvesting (at the time of SPOTT assessments)?
- **Score:** 33.33%  
  **Source:**

Please note: Company scores on Open Timber Portal are updated daily. Visit the OTP website to review the company's current performance by clicking on the source link

### 26. Number of company owned pulp and paper mills?
- **Score:** 0  
  **Source:**

This indicator is disabled as the company has informed ZSL that it doesn't own pulp or paper mills

### 27. Maps or addresses of company owned pulp and paper mills?
- **Score:** 0  
  **Source:**

This indicator is disabled as the company has informed ZSL that it does not own pulp or paper mills

### 28. Number of company owned sawmills?
- **Score:** 1  
  **Source:**

3

### 29. Maps or addresses of company owned sawmills?
- **Score:** 1  
  **Source:**

The company's three sawmills are all located within IFO's production site which can be located on Google Maps

### 30. Number of supplier mills?
- **Score:** 1  
  **Source:**

21 - The company states that its suppliers have a total of 21 sawmills in December 2018

### 31. Maps or addresses of supplier mills?
- **Score:** 0  
  **Source:**

No source

### 32. Procedures to trace raw materials to country of harvest?
- **Score:** 1  
  **Source:**

### 33. Procedures to trace raw materials to FMU level?
- **Score:** 1  
  **Source:**
34. Percentage of supply traceable to country level (above 80%)?
87%

35. Percentage of supply traceable to FMU level (above 75%)?
87%

### Deforestation and biodiversity

#### 36. Commitment to zero conversion of natural forest?

- ✓ 1 / 1  
  The company's Responsible Forestry and Procurement policy applies to its suppliers

#### 37. Zero conversion commitment applies to all sourcing?

- ✓ 1 / 1  
  The company's Responsible Forestry and Procurement policy applies to its suppliers

#### 38. Commitment to minimise the impact of logging roads?

- ✓ 1 / 1  
  

#### 39. Commitment to protect forest areas from illegal activities?

- ✓ 1 / 1  
  FSC Principles and Criteria (FSC-POL-01-004 V2-0 EN) require that forests are protected from illegal harvesting, settlement and other unauthorized activities. Full points have therefore been awarded for this indicator on the basis of the company's FSC certified landbank, which stands at 1,159,643 ha (100% of total operational area)

#### 40. Evidence of monitoring deforestation?

- ✓ 1 / 1  
  The monitoring of forest extent and condition is covered by FSC Principles and Criteria (FSC-POL-01-004 V2-0 EN). Full points have therefore been awarded for this indicator on the basis of the company's FSC certified landbank, which stands at 1,159,643 ha (100% of total operational area)

#### 41. Amount of deforestation recorded?

- ✓ 1 / 1  
  0 - The company reports that no deforestation was recorded in 2017

#### 42. Commitment to biodiversity conservation?

- ✓ 1 / 1  
  The protection of rare, threatened and endangered species and their habitats is covered by FSC Principles and Criteria (FSC-POL-01-004 V2-0 EN). Full points have therefore been awarded for this indicator on the basis of the company's FSC certified landbank, which stands at 1,159,643 ha (100% of total operational area)

#### 43. Examples of species and/or habitat conservation management?

- ✓ 1 / 1  
  

#### 44. Implementing a landscape-level approach to biodiversity conservation?

- ✓ 1 / 1  
  

#### 45. Identified species of conservation concern referencing international or national system of species classification?

- ✓ 1 / 1  
  

46. **Commitment to sustainably manage the use of non-timber forest products (NTFPs)?**
The sustainable extraction of forest products and the use rights of local communities and indigenous peoples is covered by FSC Principles and Criteria (FSC-POL-01-004 V2-0 EN). Full points have therefore been awarded for this indicator on the basis of the company's FSC certified landbank, which stands at 1,159,643 ha (100% of total operational area).

47. **Commitment not to use genetically modified organisms?**
This indicator is disabled as the company has informed ZSL that it only produces wood/wood fibre from natural forests.

48. **Commitment to conduct High Conservation Value (HCV) assessments?**
FSC Principles and Criteria (FSC-POL-01-004 V2-0 EN) require that assessments are conducted to determine the presence of High Conservation Values. Full points have therefore been awarded for this indicator on the basis of the company's FSC certified landbank, which stands at 1,159,643 ha (100% of total operational area).

49. **HCV commitment applies to all sourcing?**

50. **Commitment to only use licensed High Conservation Value (HCV) assessors accredited by the HCV Resource Network's Assessor Licensing Scheme (ALS)?**
This indicator is disabled until sufficient number of HCV ALS licensed assessors are available for the location where the company operates.

51. **High Conservation Value (HCV) assessments available?**

52. **High Conservation Value (HCV) management and monitoring plans available?**

53. **Commitment to the High Carbon Stock (HCS) Approach?**
This indicator is disabled as the company has informed ZSL that it only produces wood/wood fibre from natural forests.

54. **High Carbon Stock (HCS) assessments available?**
This indicator is disabled as the company has informed ZSL that it only produces wood/wood fibre from natural forests.

55. **Commitment to conduct social and environmental impact assessments (SEIAs)?**
FSC Principles and Criteria (FSC-POL-01-004 V2-0 EN) require assessment of environmental impacts and the incorporation of evaluations of social impact into management planning and operations. Full points have therefore been awarded for this indicator on the basis of the company's FSC certified landbank, which stands at 1,159,643 ha (100% of total operational area).

56. **Social and environmental impact assessments (SEIAs) available?**

57. **Company has provided valid legal documents to Open Timber Portal on impact assessments (at the**
### 58. Commitment to best management practices for soils and/or peat?
The company has confirmed that it does not have operations on peatland. The conservation of soils, including control of erosion and minimising damage during operations is covered by FSC Principles and Criteria (FSC-POL-01-004 V2-0 EN). Full points have therefore been awarded for this indicator on the basis of the company's FSC certified landbank, which stands at 1,159,643 ha (100% of total operational area).

### 59. Commitment to reduced impact logging?
FSC Principles and Criteria (FSC-POL-01-004 V2-0 EN) requires the avoidance of damage to forest resources and the preparation of written guidelines to minimise forest damage during harvesting. Full points have therefore been awarded for this indicator on the basis of the company's FSC certified landbank, which stands at 1,159,643 ha (100% of total operational area).

### 60. Commitment to no planting on peat of any depth?
This indicator is disabled as the company has informed ZSL that it only produces wood/wood fibre from natural forests.

### 61. Commitment on peatland planting applies to all sourcing?
This indicator is disabled as the company has informed ZSL that it only produces wood/wood fibre from natural forests.

### 62. Landbank or planted area on peat (ha)?
This indicator is disabled as the company has informed ZSL that it doesn't have landbank on peat.

### 63. Evidence of best management practices for soils and/or peat?
The company has confirmed that it does not have operations on peatland. The conservation of soils, including control of erosion and minimising damage during operations is covered by FSC Principles and Criteria (FSC-POL-01-004 V2-0 EN). Full points have therefore been awarded for this indicator on the basis of the company's FSC certified landbank, which stands at 1,159,643 ha (100% of total operational area).

### 64. Commitment to zero burning?
This indicator is disabled as the company has informed ZSL that it only produces wood/wood fibre from natural forests.

### 65. Commitment to zero burning applies to all sourcing?
This indicator is disabled as the company has informed ZSL that it only produces wood/wood fibre from natural forests.

### 66. Evidence of management and monitoring fires?
The company reports that it has established a procedure for fire-risk prevention and management in FMU Ngombe, including monitoring flights covering the entire surface of the FMU and contact with the WRI/UMD Glad research institute in order to receive regular monitoring by satellite images. The company reports that it also undertakes awareness-raising activities in villages/communities, in order to alert them to the danger of spreading forest fires, coupled with safety training in case of a fire emergency.

### 67. Details/number of hotspots/fires in FMUs controlled by the company?
The company reports that overflights of the UFA Ngombe FMU have taken place regularly every 2-3 months. The company reports that during 2017 no significant fires were detected in the FMU. In June 2018, forest loss of about 2 square km was detected through Glad satellite alerts, however it is unclear if this was due to fire

68. Time-bound commitment to reduce GHG emissions intensity?
The company has a commitment to reduce CO2 emissions from roads and infrastructures by 10% in the coming years but the target is not reported on intensity and does not include a clear time frame

69. Progress towards reducing GHG emission intensity?
0.78 - The company reports the total CO2 emissions per m3 lumber (0.89 tCO2/m3) and per m3 logs (0.67 tCO2/m3) for 2018, but this does not relate to a clear and time-bound target on GHG intensity reduction

70. Report GHG emissions from land use change?
This indicator is disabled as the company has informed ZSL that it only produces wood/wood fibre from natural forests

71. Methodology used to calculate GHG emissions?

Water, chemical and waste management

8 / 9 88.9%

2 media reports

72. Time-bound commitment to improve water quality (BOD and COD)?
The company reports that it performs daily analysis of BOD and COD levels in waste waters using standards set by the European Union in the absence of specific standards in Republic of Congo. 2017 values remained below the thresholds set by European standards

73. Progress towards commitment on water quality (BOD and COD)?
The company reports that it performs daily analysis of BOD and COD levels in waste waters using standards set by the European Union in the absence of specific standards in Republic of Congo. 2017 values remained below the thresholds set by European standards

74. Commitment to protection of natural waterways through buffer zones?
This indicator is disabled as the company has informed ZSL that it does not own pulp or paper mills

75. Evidence of treatment of pulp and paper mill effluent?
This indicator is disabled as the company has informed ZSL that it does not own pulp or paper mills

76. Evidence of sawmill run-off containment and wastewater treatment?
This indicator is disabled as the company has informed ZSL that it does not own pulp or paper mills

77. Time-bound commitment to improve water use intensity?
This indicator is disabled as the company has informed ZSL that it does not own pulp or paper mills

78. Progress towards commitment on water use intensity?
This indicator is disabled as the company has informed ZSL that it does not own pulp or paper mills
79. Commitment to eliminate chlorine and chlorine compounds for bleaching?
This indicator is disabled as the company has informed ZSL that it does not own pulp or paper mills

80. Commitment to minimise the use of chemicals, including pesticides and chemical fertilisers?

81. No use of World Health Organisation (WHO) Class 1A and 1B pesticides?

82. No use of chemicals listed under the Stockholm Convention and Rotterdam Convention?

83. Integrated Pest Management (IPM) approach?

84. Chemical usage per ha or list of chemicals used?

85. Commitment to human rights, referencing the UN Declaration on Human Rights or UN Guiding Principles on Business and Human Rights?

86. Commitment to human rights applies to all sourcing?

87. Commitment to respect indigenous and local communities' rights?

88. Commitment to respect legal and customary property rights?
FSC Principles and Criteria (FSC-POL-01-004 V2-0 EN) require that legal and customary property rights are respected. Full points have therefore been awarded for this indicator on the basis of the company’s FSC certified landbank, which stands at 1,159,643 ha (100% of total operational area)

89. Commitment to free, prior and informed consent (FPIC)?

90. FPIC commitment applies to independent suppliers?

91. Details of free, prior and informed consent (FPIC) process available?

92. Examples of local stakeholder engagement to prevent conflicts?

93. Details of process for addressing land conflicts available?
<table>
<thead>
<tr>
<th>Question</th>
<th>Source</th>
<th>Answer</th>
</tr>
</thead>
<tbody>
<tr>
<td>94. Commitment to support the inclusion of women across forestry operations, including addressing barriers faced?</td>
<td>No source</td>
<td>No source</td>
</tr>
<tr>
<td>95. Commitment to provide essential community services and facilities?</td>
<td>Source</td>
<td>✓ 1 / 1</td>
</tr>
<tr>
<td>FSC Principles and Criteria (FSC-POL-01-004 V2-0 EN) require certified organisations to contribute to the social and economic development of local communities. Full points have therefore been awarded for this indicator on the basis of the company's FSC certified landbank, which stands at 1,159,643 ha (100% of total operational area)</td>
<td></td>
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</tr>
<tr>
<td>96. Company has provided valid legal documents to Open Timber Portal on population rights (at the time of SPOTT assessments)?</td>
<td>Source</td>
<td>✓ 1 / 1</td>
</tr>
<tr>
<td>66.67% - Score of IFO in this OTP category. Please note: Company scores on Open Timber Portal are updated daily. Visit the OTP website to review the company's current performance by clicking on the source link</td>
<td></td>
<td></td>
</tr>
<tr>
<td>97. Commitment to respect all workers' rights?</td>
<td>Source</td>
<td>✓ 1 / 1</td>
</tr>
<tr>
<td>98. Reference to Fundamental ILO Conventions?</td>
<td>Source</td>
<td>✓ 1 / 1</td>
</tr>
<tr>
<td>99. Commitment to eliminate gender related discrimination with regards to employment and occupation?</td>
<td>Source</td>
<td>✓ 1 / 1</td>
</tr>
<tr>
<td>100. Company has provided valid legal documents to Open Timber Portal on labour regulations (at the time of SPOTT assessments)?</td>
<td>Source</td>
<td>✓ 1 / 1</td>
</tr>
<tr>
<td>85.71% - Score of IFO in this OTP category. Please note: Company scores on Open Timber Portal are updated daily. Visit the OTP website to review the company's current performance by clicking on the source link</td>
<td></td>
<td></td>
</tr>
<tr>
<td>101. Percentage or number of temporary employees?</td>
<td>Source</td>
<td>✓ 1 / 1</td>
</tr>
<tr>
<td>285 (23.4%) - Employees of subcontracting companies for Industrie Forestiere de Ouesso (IFO)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>102. Percentage or number of women employees?</td>
<td>Source</td>
<td>✓ 1 / 1</td>
</tr>
<tr>
<td>43 (3.5%) - Percentage figure calculated based on total employee number (1218) for IHC, IFO and LCC</td>
<td></td>
<td></td>
</tr>
<tr>
<td>103. Payment of minimum wage?</td>
<td>Source</td>
<td>✓ 1 / 1</td>
</tr>
<tr>
<td>104. Reporting of salary by gender?</td>
<td>No source</td>
<td>No source</td>
</tr>
<tr>
<td>105. Commitment to address occupational health and safety, referencing the ILO Code of Practice on Safety and Health in Forestry Work?</td>
<td>Source</td>
<td>✓ 1 / 1</td>
</tr>
<tr>
<td>106. Time lost due to work-based injuries?</td>
<td>Source</td>
<td>✓ 1 / 1</td>
</tr>
<tr>
<td>3.1 - Figure details the number of accidents with incapacity of more than 4 days per 100 workers in 2016 for Industrie Forestiere de Ouesso (IFO) in 2017</td>
<td></td>
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</tr>
<tr>
<td>107. Number of fatalities as a result of work-based accidents?</td>
<td>Source</td>
<td>✓ 1 / 1</td>
</tr>
</tbody>
</table>

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3.1 - Figure details the number of accidents with incapacity of more than 4 days per 100 workers in 2016 for Industrie Forestiere de Ouesso (IFO) in 2017
<table>
<thead>
<tr>
<th>Question</th>
<th>达标</th>
<th>来源</th>
</tr>
</thead>
<tbody>
<tr>
<td>108. Provision of personal protective equipment and related training?</td>
<td>✔ 1/1</td>
<td>Source</td>
</tr>
<tr>
<td>109. Time-bound plan for achieving 100% third-party legality verification of FMUs or achieved?</td>
<td>✔ 1/1</td>
<td>Source</td>
</tr>
<tr>
<td>Target already met</td>
<td></td>
<td></td>
</tr>
<tr>
<td>110. Time-bound plan to source only wood/wood fibre that is in legal compliance verified by a third party?</td>
<td>✔ 1/1</td>
<td>Source</td>
</tr>
<tr>
<td>2,028 - For non-negligible risk areas, the company has a time-bound commitment (within 10 years) to only source third party legality verified or certified timber. For negligible risk areas, the company states that it only sources timber that is in legal compliance, and did not source any timber from low risk regions in 2018</td>
<td></td>
<td></td>
</tr>
<tr>
<td>111. Percentage area (ha) verified as being in legal compliance by a third party?</td>
<td>✔ 1/1</td>
<td>Source</td>
</tr>
<tr>
<td>1,159,640 (100%) - The company is 100% FSC certified and VLC certified</td>
<td></td>
<td></td>
</tr>
<tr>
<td>112. Percentage of all wood/wood fibre supply traded/processed verified as being in legal compliance by a third party?</td>
<td>✔ 1/1</td>
<td>Source</td>
</tr>
<tr>
<td>87% - 87% FSC/PEFC certified</td>
<td></td>
<td></td>
</tr>
<tr>
<td>113. Time-bound plan for achieving 100% FSC FM certification of FMUs or achieved 100% FSC-certification of FMUs?</td>
<td>✔ 1/1</td>
<td>Source</td>
</tr>
<tr>
<td>100% - Target already met</td>
<td></td>
<td></td>
</tr>
<tr>
<td>114. Commitment to source only wood/wood fibre that meets FSC Controlled Wood requirements?</td>
<td>✔ 1/1</td>
<td>Source</td>
</tr>
<tr>
<td>The company commits to avoid controversial sources referencing both FSC Controlled Wood and PEFC Controlled Sources</td>
<td></td>
<td></td>
</tr>
<tr>
<td>115. Percentage area (ha) FSC FM certified?</td>
<td>✔ 2/2</td>
<td>Source</td>
</tr>
<tr>
<td>1,159,640 (100%)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>116. Percentage of wood/wood fibre supply from outgrower scheme and/or independent suppliers that is FSC FM certified?</td>
<td>✔ 2/2</td>
<td>Source</td>
</tr>
<tr>
<td>87%</td>
<td></td>
<td></td>
</tr>
<tr>
<td>117. Percentage of all wood/wood fibre supply traded/processed that are FSC certified (above 75%)?</td>
<td>✔ 2/2</td>
<td>Source</td>
</tr>
<tr>
<td>88% - The company reports that 88% of the total volume of wood procured (total RWE volume being 251,393 m³) was FSC certified in 2018</td>
<td></td>
<td></td>
</tr>
<tr>
<td>118. Percentage area (ha) PEFC certified (excluding FSC certified area)?</td>
<td>✔ 2/2</td>
<td>Source</td>
</tr>
<tr>
<td>The indicator is disabled as the company is 100% FSC certified</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
119. Programme to support outgrower scheme smallholders?
This indicator is disabled as the company has informed ZSL that it doesn't source wood/wood fibre from outgrowers.

120. Percentage of outgrower scheme smallholders involved in programme?
This indicator is disabled as the company has informed ZSL that it doesn't source wood/wood fibre from outgrowers.

121. Process used to prioritise, assess and/or engage suppliers on compliance with company's policy and/or legal requirements?
Due diligence system comprising of a risk assessment to establish ahead of any procurement commitment the level of potential legality risks which may arise from the respective wood species, country of origin, forest of origin, or supplier.

122. The company has a Due Diligence System (DDS)?

123. Suspension or exclusion criteria for suppliers?

124. Percentage of suppliers assessed and/or engaged on compliance with company requirements?
6 - Total number for 2016.

125. Commitment to ethical conduct and prohibition of corruption?

126. Company has provided valid legal documents to Open Timber Portal on legal registration (at the time of SPOTT assessments)?
100% - Score of IFO in this OTP category.
Please note: Company scores on Open Timber Portal are updated daily. Visit the OTP website to review the company's current performance by clicking on the source link.

127. Disclosure of the company's management approach to tax and payments to governments?
The company states that it has procedures on tax payments that are reviewed by Interholco's management and aligned with the OECD's Guidelines for Multinational Enterprises. However, its tax strategy / policy is not publicly available.

128. Company has provided valid legal documents to Open Timber Portal on taxes, fees and royalties (at the time of SPOTT assessments)?
100% - Score of IFO in this OTP category.
Please note: Company scores on Open Timber Portal are updated daily. Visit the OTP website to review the company's current performance by clicking on the source link.
<p>| | | |</p>
<table>
<thead>
<tr>
<th></th>
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<tbody>
<tr>
<td>129. Whistleblowing procedure?</td>
<td>✔</td>
<td>1 / 1</td>
</tr>
<tr>
<td>130. Own grievance or complaints system open to all stakeholders?</td>
<td>✔</td>
<td>1 / 1</td>
</tr>
<tr>
<td>131. Details of grievances disclosed?</td>
<td>✔</td>
<td>2 / 2</td>
</tr>
</tbody>
</table>