Olam International

Total score: 71.4%

Latest update: July 2020
Next scheduled: July 2021

About this company: Established in 1989, Singapore based commodity producer and trader Olam International operates forestry concessions in the Republic of Congo through its subsidiary Congolaise Industrielle de Bois (CIB). Olam is involved in timber production, processing, manufacturing, trading and distribution of products. The company also sources wood for processing from Myanmar through its subsidiary Concorde Industries Limited (CIL).

Landbank: 2,200,000 hectares
Market cap: 3,206,387,851 USD
Thomson Reuters ticker: OLAM.SI
Bloomberg ticker: OLAM:SP
ISIN: SG1Q75923504
Activities: Timber production; Timber processing and manufacturing; Trading and distribution
Locations: Republic of Congo (Brazzaville), Myanmar
Headquarters: Singapore
Related companies: Olam International is also assessed on SPOTT for its palm oil operations.
Website: https://www.olamgroup.com/

Latest annual report (2019)

Thomson Reuters ticker: OLAM.SI
Bloomberg ticker: OLAM:SP

Sustainability policy and leadership

1. Sustainable forestry policy or commitment for all its operations?
   The company has its Living Landscapes Policy, as well as a Plantations, Concessions and Farms Code that applies to upstream operations and joint ventures, and an Environmental Sustainability Policy. It has a separate Supplier Code that applies to any entity that sell goods or services to the company.

2. Sustainable forestry policy or commitment applies to all suppliers?
   The company's Living Landscape Policy applies to all the company's agricultural commodity businesses, including upstream production, and third-party sourcing through its Supplier Code.

3. High-level position of responsibility for sustainability?
   Global Head Corporate Responsibility & Sustainability (CR&S).

4. One or more members within the board of the company have responsibility for sustainability?
   4 - Four board members sit on the Board’s Corporate Responsibility and Sustainability Committee.

5. Percentage or number of women in senior management team?
The company provides names and photos of Executive Committee members on its website, but does not explicitly report on the gender balance of this team - though it can be determined that there are no women on this team. However, this information is undated. The company also reports names of Executive Committee members in its 2019 annual report, but does not report on gender balance there, and this list also differs from the list on the website so the two lists cannot be accurately cross-referenced to calculate the percentage of women.

6. Percentage or number of women board members?
1 - The company reported explicitly on the gender diversity of the board in its 2018 annual report, but this data is now two years old. In the company's 2019 annual report the number of women can be calculated but the company does not explicitly report on the gender balance of the Board.

7. Member of multiple industry schemes or other external initiatives to reduce negative environmental or social outcomes associated with timber and pulp production?
FSC, PEFC, UNGC, Natural Capital Coalition, TFA 2020, ATIBT, Congo Basin Forest Partnership (CBFP), European Coalition for Sustainable Tropical Timber (STTC), WBCSD, HCVRN.

8. Collaboration with stakeholders to reduce negative environmental or social outcomes associated with timber and pulp production?

9. Sustainability report published within last two years?
Sustainability report within 2019 annual report.

10. Reports through standardised reporting systems?
GRI 2020, CDP Forest and CDP Climate 2019.

11. Climate risks assessment available?
The company reports on actions it will take to mitigate climate risk in its 2019 annual report, but a full or summary assessment of climate risks to the business could not be found. The company reported on climate to CDP in 2019, but this report is not publicly available.

12. Natural capital assessment available?
The company identifies and quantifies some of its natural capital dependencies in its 2018 annual report, and sets out goals in relation to this in both its 2018 and 2019 annual reports. It is not clear if this work has been externally verified.

13. Lists countries and operations?
Republic of Congo (forest concessions and production facilities under CIB), and Myanmar (production facility under CIL).

14. Lists countries sourcing from?

15. Total area of natural forest designated for wood/wood fibre production (ha)?
- 2,200,000 - The company reports its concessions in RoC cover ‘approximately’ 2.1 million hectares. It also mentions approximately 92,500 ha preserved as standing forest under REDD+ - it is not clear if this is included under the 2.1 million hectares. Both these figures are undated. However, a 2018 HCV report states the company has approximately 2.2 million hectares under its CIB subsidiary in RoC.

16. Total area of forest plantation (ha)?
- This indicator is disabled as the company reports that it only produces wood/wood fibre from natural forests.

17. Area of plantation/natural forest within outgrower schemes (ha)?
- This indicator is disabled as the company reports that it doesn’t use outgrower schemes for wood/wood fibre production.

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

19. Conservation set-aside area, including HCV area (ha)?
- 433,699 - The conservation area, including HCV area, can be found in each FSC audit report.

20. Area of Intact Forest Landscape (ha)?
- 177,000 - Partial points on the basis of IFL assessment for one FMU: Mimbeli Ibenga.

21. Number of Forest Management Units (FMUs)?
- 4 - The company reports it has four FMUs, all in Republic of Congo: Pokola, Loundoungou, Kabo and Mimbeli. It also controls Pikounda concession in RoC, but this is set aside as part of a REDD+ project.

22. Maps of forest management units (FMUs)?
- Maps for Pokola, Loundoungou, Kabo and Mimbeli concessions, and REDD+ set aside Pikounda, available on Open Timber Portal and the GFW Forest Atlas for RoC. The company provides a static map of concessions on its website.

23. Forest management plans available for all FMUs?
- ✓

24. Monitoring of forest management plan implementation available?
- ×
- Monitoring results of the implementation of Forest Management Plans for the four concessions are only publicly available upon request, as stated under Criterion 8.5 in the FSC audit report of each concession.

25. Company has provided valid legal documents to Open Timber Portal on use right (at the time of SPOTT assessments)?
- ✓
- 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. Company has provided valid legal documents to Open Timber Portal on forest management (at the time of SPOTT assessments)?
- ✓
- 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.
### 27. Company has provided valid legal documents to Open Timber Portal on timber harvesting (at the time of SPOTT assessments)?

*Source: 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.*

| 0.5 / 1 Source |  |

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### 28. Names and locations of all third-party supplying FMUs?

| × 0 / 1 |  |

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### 29. Number of company owned sawmills?

| ✓ 1 / 1 Source |

5 - The company reports that it owns and operates four sawmills in the Republic of Congo and one in Myanmar.

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### 30. Names and locations of company owned sawmills?

| 0.5 / 1 Source |

The company provides maps showing locations of four sawmills - three in the RoC and one in Myanmar. However, it reports it has five sawmills in total, so the location of the other one in the RoC is not clear. The company’s static map also only shows three sawmills in the RoC.

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### 31. Number of company-owned pulp and paper mills?

This indicator is disabled as the company reports that it doesn’t own pulp or paper mills.

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### 32. Names and locations of company-owned pulp and paper mills?

This indicator is disabled as the company reports that it doesn’t own pulp or paper mills.

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### 33. Reports total volumes (or percentages) sourced by company-owned sawmills that come from company’s own operations and/or third-parties?

| × 0 / 1 |  |

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### 34. Reports total volumes (or percentages) sourced by company-owned pulp and paper mills that come from company’s own operations and/or third-parties?

This indicator is disabled as the company reports that it doesn’t own pulp or paper mills.

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### 35. Number of third party supplying mills?

| × 0 / 1 |  |

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### 36. Names and locations of all third party supplying mills?

| × 0 / 1 |  |

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### 37. Reports total volume (or percentages) sourced from third-party supplying mills that come from the supplying mills’ own operations and/or third parties?

| × 0 / 1 |  |

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### 38. Procedures to trace raw materials to country of harvest?

| ✓ 1 / 1 Source |

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### 39. Percentage of supply traceable to country of harvest?

| ✓ 1 / 1 Source |

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### 40. Procedures to trace raw materials to FMU level?

The company makes this commitment through the FSC Chain of Custody Certification Standard (FSC-STD-40-004). As the Standard’s requirements do not fully meet the SPOTT indicator criteria partial points have been awarded on the basis of the company’s FSC CoC certification.

| 0.5 / 1 Source |  |

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## 41. Percentage of supply traceable to FMU level?

- Yes

Source: [9 media reports](#)

## 42. Time-bound plan for achieving 100% third-party legality verification of FMUs or achieved?

The company is now 100% FSC-certified.

Source: [1 media report](#)

## 43. Percentage area (ha) verified as being in legal compliance by a third party?

100% - The company's concessions are 100% FSC-certified.

Source: [1 media report](#)

## 44. Time-bound plan to source only wood/wood fibre that is in legal compliance verified by a third party?

- No

Source: [0 media reports](#)

## 45. Percentage of all wood/wood fibre supply traded/processed verified as being in legal compliance by a third party?

- No

Source: [0 media reports](#)

## 46. Percentage area (ha) FSC FM certified?

100% - Since March 2020, the company's concessions are 100% certified.

Source: [1 media report](#)

## 47. Time-bound plan for achieving 100% FSC FM certification of FMUs or achieved 100% FSC-certification of FMUs?

The company's concessions are 100% certified.

Source: [1 media report](#)

## 48. Percentage of wood/wood fibre supply (tonnes) from all suppliers that comes from FSC FM certified areas?

- No

Source: [0 media reports](#)

## 49. Commitment to source only wood/wood fibre that meets FSC Controlled Wood and/or PEFC Controversial Sources requirements?

- No

Source: [0 media reports](#)

## 50. Percentage area (ha) PEFC certified (excluding FSC certified area)?

This indicator is disabled as the company reports that it doesn't operate in a country with a PEFC-endorsed SFM standard.

Source: [9 media reports](#)
The company commits in its Living Landscapes Policy to "no conversion or degradation of critical habitats such as High Conservation Value (HCV) areas and other nationally-recognised conservation priorities" and "no conversion or degradation of other natural habitats with high levels of organic carbon such as High Carbon Stock (HCS) forests." This commitment has been in place since April 2018.

Commitment to zero deforestation or zero conversion of natural ecosystems?

The commitment covers no illegal deforestation, no conversion or degradation of "critical habitats such as High Conservation Value (HCV) areas and other nationally recognised conservation priorities ... other natural habitats with high levels of organic carbon such as High Carbon Stock (HCS) forests". The company also states it recognises "that some degraded ecosystems such as logged tropical forest may be classified as HCV or critical habitat and require protection or restoration."

Criteria for defining deforestation?

[Externally verified] There is evidence of the company monitoring deforestation in its Mimbeli concession using Global Forest Watch, but the extent of area covered and further monitoring methodologies used are unclear.

Evidence of monitoring deforestation?

The company's 2018 report indicates that none of the company's HCVs were affected by illegal logging or conversion. However, these HCV reports do not account for the company's full operational area.

Amount of illegal/non-compliant deforestation recorded?

The company states its takes a net-positive approach and will support conservation efforts including landscape restoration in landscapes in which it operates. However, the company does not make a clear commitment that in the case of non-compliant deforestation it will directly correct and compensate for this through restoration.

Commitment to restoration of non-compliant deforestation/conversion?

Implementing a landscape or jurisdictional level approach?

[Externally verified] Points for external verification have been awarded on the basis of the company's FSC-certification. As the P&C do not fully meet the SPOTT indicator criteria limited, externally verified points have therefore been awarded for this indicator.

Commitment to biodiversity conservation?

Commitment to biodiversity conservation applies to all suppliers?

Identified species of conservation concern, referencing international or national system of species classification?
63. Examples of species and/or habitat conservation management?

- **Yes** 1/1 Source

64. Commitment to no hunting or only sustainable hunting of species?

- **Yes** 1/1 Source

   The company states it "supports the eco-guards, who are employed by the government and other organisations, to protect against illegal logging and prevent the poaching of animals, such as large apes and elephants" while maintaining areas in its concessions "to enable indigenous people to continue their traditional subsistence hunting of small game in the region, excluding the buffer zones around the National Parks".

65. Commitment to no hunting or only sustainable hunting of species applies to all suppliers?

- **No** 0/1

66. Commitment to protect forest areas from illegal activities?

- **Yes** 1/1 Source

67. Commitment to protect forest areas from illegal activities applies to all suppliers?

- **Yes** 1/1

68. Evidence of protecting forest areas from illegal activities?

- **Yes** 1/1

69. Commitment to no use of genetically modified organisms?

- **Yes** 1/1 Source

   This indicator is disabled as the company reports that it only produces wood/wood fibre from natural forests.

70. Commitment to no use of genetically modified organisms applies to all suppliers?

- **Yes** 1/1 Source

   The company makes this commitment through the FSC Policy for Association (FSC-POL-01-004). Full points have therefore been awarded on the basis of the company's FSC-certification/FSC membership.

71. Commitment to conduct High Conservation Value (HCV) assessments?

- **Yes** 1/1 Source

72. Commitment to conduct High Conservation Value (HCV) assessments applies to all suppliers?

- **Yes** 1/1 Source

73. High Conservation Value (HCV) assessments available?

- **Pending** 0.75/1 Source

   HCV assessment is available for all four concessions, which appears to be self-reported.

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

- **Yes** 1/1 Source

   HCV management is available for all four concessions. These reviews have been reviewed during FSC audits.
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<tr>
<th>75. Commitment to the High Carbon Stock (HCS) Approach?</th>
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<td>This indicator is disabled as the company reports that it only produces wood/wood fibre from natural forests.</td>
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<tr>
<th>76. Commitment to the High Carbon Stock (HCS) Approach applies to all suppliers?</th>
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<tr>
<td>✓ 1 / 1 Source</td>
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<tr>
<th>77. High Carbon Stock (HCS) assessments available?</th>
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<th>78. Commitment to conduct social and environmental impact assessments (SEIAs)?</th>
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<td>✓ 1 / 1 Source</td>
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<tr>
<th>79. Commitment to conduct social and environmental impact assessments (SEIAs) applies to all suppliers?</th>
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<tr>
<td>✓ 1 / 1 Source</td>
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<tr>
<th>80. Social and environmental impact assessments (SEIAs) available, and associated management and monitoring plans?</th>
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<tr>
<td>✓ 1 / 1 Source</td>
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<th>81. Company has provided valid legal documents to Open Timber Portal on impact assessments (at the time of SPOTT assessments)?</th>
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<td>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>
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<th>82. Commitment to no planting on peat of any depth?</th>
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<tr>
<td>This indicator is disabled as the company reports that it only produces wood/wood fibre from natural forests.</td>
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<tr>
<th>83. Commitment to no planting on peat of any depth applies to all suppliers?</th>
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<td>✓ 1 / 1 Source</td>
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<th>84. Landbank or planted area on peat (ha)?</th>
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<th>85. Implementation of commitment to no planting on peat of any depth?</th>
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<tr>
<th>86. Commitment to best management practices for soils and peat?</th>
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<td>The company has told ZSL it does not have concessions on peat. The company states it &quot;takes measures to minimise&quot; erosion and degradation, and to &quot;maintain or enhance soil fertility&quot;.</td>
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<tr>
<th>87. Commitment to best management practices for soils and peat applies to all suppliers?</th>
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<tr>
<td>The company commits to international best practices to &quot;conserve forests and other natural habitats with high levels of biomass or organic carbon&quot;, and this applies also to suppliers, but it does not make a clear commitment regarding best</td>
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</table>
management practices on soils that applies to suppliers.

88. Evidence of best management practices for soils and peat?
The company reports that it does not have operations on peatland. Points for external verification have been awarded on the basis of the company’s FSC-certified landbank.

89. Commitment to reduced impact logging?

90. Commitment to reduced impact logging applies to all suppliers?

91. Evidence of implementing reduced impact logging practices?
Points for external verification have been awarded on the basis of the company’s FSC-certified landbank. Evidence of the company implementing Reduced Impact Logging techniques is also reported in its FSC audit reports.

92. Commitment to zero burning?
This indicator is disabled as the company reports that it only produces wood/wood fibre from natural forests.

93. Commitment to zero burning applies to all suppliers?

94. Evidence of fire monitoring and management?
Points for external verification have been awarded on the basis of the company’s FSC certification. As the P&Cs do not fully meet the SPOTT indicator criteria limited, externally verified points have therefore been awarded for this indicator. There is some evidence of fire management in its 2018 HCV report. The company also refers to management and monitoring of fires on its website, but this information is undated.

95. Details/number of hotspots/fires in company FMUs?
The company published information on the risks and potential causes of fire within its concessions in its 2018 HCV report, but reporting on the total number of fires over a specified time frame was not found.

96. Details/number of hotspots/fires in suppliers operations?

97. Time-bound commitment to reduce greenhouse gas (GHG) emissions intensity?
The company commits to reduce its GHG emissions in its own operations and third-party supply chains by 50% by 2030 - i.e. a reduction of 3.85% a year.

98. GHG emissions intensity?
In its 2019 annual report the company reports 1.22 tonnes CO2e/tonne production in 2019 for “Olam farms and estates” - but it is not clear if this includes forestry operations.

99. GHG emissions from land use change?
This indicator is disabled as the company reports that it only produces wood/wood fibre from natural forests.

100. Progress towards commitment to reduce GHG emissions intensity?
The company reports 1.22 tonnes CO2e/tonne production in 2019 for “Olam farms and estates”, but it is not clear if this includes forestry operations, and this figure does not appear to have been decreasing over the last two years.

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<tr>
<th>101. Methodology used to calculate GHG emissions?</th>
<th>× 0 / 1</th>
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<tr>
<td>102. Time-bound commitment to improve water use intensity?</td>
<td>This indicator is disabled as the company reports that it doesn’t own pulp or paper mills.</td>
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<td>103. Water use intensity?</td>
<td>This indicator is disabled as the company reports that it doesn't own pulp or paper mills.</td>
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<tr>
<td>104. Progress towards commitment on water use intensity?</td>
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<tr>
<td>105. Time-bound commitment to improve water quality (BOD and COD)?</td>
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<tr>
<td>106. Progress towards commitment on water quality (BOD and COD)?</td>
<td>This indicator is disabled as the company reports that it doesn't own pulp or paper mills.</td>
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<tr>
<td>107. Treatment of pulp and paper mill effluent?</td>
<td>This indicator is disabled as the company reports that it doesn't own pulp or paper mills.</td>
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<tr>
<td>108. Evidence of sawmill run-off containment and wastewater treatment?</td>
<td>× 0 / 1</td>
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<td>109. Proportion of processing facilities with closed-loop water treatment system?</td>
<td>This indicator is disabled as the company reports that it doesn't own pulp or paper mills.</td>
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<tr>
<td>110. Commitment to protect natural waterways through buffer zones?</td>
<td>1 / 1 Source</td>
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<tr>
<td>111. Implementation of commitment to protect natural waterways through buffer zones?</td>
<td>The FSC audit reports for each of the company's concessions provides evidence of the creation of buffer zones.</td>
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<tr>
<td>112. Commitment to minimise the use of chemicals, including pesticides and chemical fertilisers?</td>
<td>1 / 1 Source</td>
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<td></td>
<td>113. Commitment to minimise the use of chemicals, including pesticides and chemical fertilisers, applies to all suppliers?</td>
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<td></td>
<td>The company states on its website that it is committed to minimising the use of all chemicals across its timber operations, but it is not clear if this commitment also applies to all suppliers.</td>
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<th>114. Evidence of eliminating chlorine and chlorine compounds for bleaching?</th>
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<td>This indicator is disabled as the company reports that it doesn't own pulp or paper mills.</td>
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<th>115. Commitment to no use of World Health Organisation (WHO) Class 1A and 1B pesticides?</th>
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<td>✓ 1 / 1 Source</td>
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<th>116. Commitment to no use of World Health Organisation (WHO) Class 1A and 1B pesticides applies to all suppliers?</th>
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<td>✗ 0 / 1 Source</td>
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<th>117. Commitment to no use of chemicals listed under the Stockholm Convention and Rotterdam Convention?</th>
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<td>✗ 0 / 1 Source</td>
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<th>118. Commitment to no use of chemicals listed under the Stockholm Convention and Rotterdam Convention applies to all suppliers?</th>
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<th>119. Chemical usage per ha or list of chemicals used?</th>
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<td>✓ 1 / 1 Source</td>
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<th>120. Implementation of commitment to reduce chemical usage?</th>
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<td>✓ 1 / 1 Source</td>
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<th>121. Integrated Pest Management (IPM) approach?</th>
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<td>✓ 1 / 1 Source</td>
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<th>122. Waste management system in place to avoid negative impacts?</th>
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<td>✗ 0.75 / 1 Source</td>
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<th>123. Commitment to human rights?</th>
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<tr>
<th></th>
<th>Community, land and labour rights</th>
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<tr>
<td></td>
<td>30.51 / 37 82.5%</td>
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|   | 7 media reports |

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<tr>
<th></th>
<th>123. Commitment to human rights?</th>
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<tr>
<td></td>
<td>The company makes this commitment through the FSC Policy for Association (FSC-POL-01-004). Full points have therefore been awarded.</td>
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been awarded on the basis of the company’s FSC-certification/FSC membership.

124. Commitment to human rights applies to all suppliers?
The company makes this commitment through the FSC Policy for Association (FSC-POL-01-004). Full points have therefore been awarded on the basis of the company’s FSC-certification/FSC membership.

125. Progress on human rights commitment?
The company reports providing general training for employees and workers on human rights in its 2019 annual report. This information does not seem to be externally verified.

126. Commitment to respect Indigenous and local communities’ rights?
The company makes this commitment through the FSC Policy for Association (FSC-POL-01-004). Full points have therefore been awarded on the basis of the company’s FSC-certification/FSC membership.

127. Commitment to Indigenous and local communities’ rights applies to all suppliers?
The company makes this commitment through the FSC Policy for Association (FSC-POL-01-004). Full points have therefore been awarded on the basis of the company’s FSC-certification/FSC membership.

128. Commitment to respect legal and customary land tenure rights?

129. Commitment to legal and customary land rights applies to all suppliers?

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

131. Commitment to free, prior and informed consent (FPIC) applies to all suppliers?

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

133. Examples of local stakeholder engagement to prevent conflicts?

134. Details of process for addressing land conflicts available?

135. Supports the inclusion of women across forestry operations, including addressing barriers faced?
The company reports many activities to support the inclusion of women, though it is not clear if any of these are specifically being implemented in its forestry operations. This information is self-reported.

136. Company has provided valid legal documents to Open Timber Portal on population rights (at the time of SPOTT assessments)?
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.

137. Commitment to enable sustainable use of non-timber forest products (NTFPs) by local communities?
The company makes this commitment through the FSC Principles and Criteria (FSC-POL-01-004 V2-0 EN). Full points have therefore been awarded on the basis of the company’s FSC-certified landbank (either 100% or 775% and a further
The company has a goal of its Healthy Living Campaign reaching 250,000 people by the end of 2020, which includes community access to various services. It is not clear if this commitment covers all the company's forestry operations, or whether this commitment goes beyond health services to include other community services. The company provides examples of providing community services and facilities in CIB concessions, but this is assessed under another indicator. The company makes this commitment through the FSC Principles and Criteria (FSC-POL-01-004 V2-0 EN). Full points have therefore been awarded on the basis of the company's FSC-certified landbank (either 100% or 75% and a further commitment to be 100% certified within five years).

points for external verification have been awarded on the basis of the company's FSC-certified landbank. The company also reports in its 2018 annual report multiple examples of CIB providing services and facilities to local communities - such as providing water, building a school, supplying generators, and providing medical services.

The company makes a commitment to provide economic opportunities for rural communities, and states goals to create economic opportunities for smallholders and other beneficiaries by the end of 2020 in its 2019 annual report. Note, however, that it is not clear if these commitments specifically cover all its forestry operations as well.

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.

The company makes this commitment through the FSC Policy for Association (FSC-POL-01-004). Full points have therefore been awarded on the basis of the company's FSC-certification/FSC membership.

[Externally verified] Points for external verification have been awarded on the basis of the company's FSC-certification. As the P&C do not fully meet the SPOTT indicator criteria limited, externally verified points have therefore been awarded for this indicator. The company also self-reports in its 2019 annual report various actions taken to implement its workers' rights policies, including training farmers and workers on labour rights, training employees on employment laws and working conditions, and monitoring to detect child labour in its own operations.

It is not clear if the commitment to eliminate gender discrimination outlined in the company's Fair Employment Policy applies to all suppliers. Specification for 'Level 3' audits (which seems to have the widest scope to include all suppliers) only refers to "workplace design makes reasonable accommodation for employees with special needs". The Supplier Code and Living Landscapes policy refer to no discrimination, but do not specify on the basis of gender.
<table>
<thead>
<tr>
<th>Question</th>
<th>Score</th>
<th>Source</th>
</tr>
</thead>
<tbody>
<tr>
<td>147. Progress on commitment to eliminate gender related discrimination with regards to employment?</td>
<td>0.75</td>
<td>Source</td>
</tr>
<tr>
<td>The company reports activities to recruit more women in senior positions in its 2019 annual report, including training for recruiters on unconscious bias and establishing a diversity governance committee, as well as elsewhere in its supply chain - e.g. providing gender sensitivity workshops in communities. It is not clear if reporting of these activities has been externally verified.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>148. Percentage or number of temporary employees?</td>
<td>1</td>
<td>Source</td>
</tr>
<tr>
<td>53% - Figure in 2019 annual report. Figures covers all operations, not just forestry.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>149. Percentage or number of women employees?</td>
<td>1</td>
<td>Source</td>
</tr>
<tr>
<td>30% - Figure in 2019 annual report. Figures covers all operations, not just forestry. It does not include temporary workers.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>150. Commitment to pay at least minimum wage?</td>
<td></td>
<td>Source</td>
</tr>
<tr>
<td>151. Commitment to pay at least minimum wage applies to all suppliers?</td>
<td>0.5</td>
<td>Source</td>
</tr>
<tr>
<td>The commitment stated in the company's Fair Employment Policy does not appear to apply to all suppliers. The company's Supplier Code states a requirement for &quot;Providing fair wages and benefits that are in accordance with applicable laws, industry standards and collective agreements&quot; but there is not an explicit commitment to ensure all suppliers pay at least minimum wage.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>152. Progress on commitment to pay at least minimum wage?</td>
<td>0.5</td>
<td>Source</td>
</tr>
<tr>
<td>The company states all employees in its Republic of Congo operations are paid above the country's minimum salary, but this information is undated. There is reporting of minimum daily wage paid to workers in the CIB FSC FM audit reports, but without confirmation that this figure is in line with local or national or industry-standard minimum wage requirements. There is not evidence that all workers across all Olam operations are paid at least minimum wage.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>153. Reporting of salary by gender?</td>
<td>0</td>
<td></td>
</tr>
<tr>
<td>154. Commitment to address occupational health and safety?</td>
<td>0.5</td>
<td>Source</td>
</tr>
<tr>
<td>The ILO Code of Practice on Safety and Health in Forestry Work is not referenced.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>155. Commitment to address occupational health and safety applies to all suppliers?</td>
<td>0.5</td>
<td>Source</td>
</tr>
<tr>
<td>The company makes this commitment through the FSC Chain of Custody Certification Standard (FSC-STD-40-004). As the Standard's requirements do not fully meet the SPOTT indicator criteria partial points have been awarded on the basis of the company's FSC CoC certification.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>156. Provision of personal protective equipment and related training?</td>
<td>0.75</td>
<td>Source</td>
</tr>
<tr>
<td>(Externally verified) Points for external verification have been awarded on the basis of the company's FSC-certification. As the P&amp;C do not fully meet the SPOTT indicator criteria limited, externally verified points have therefore been awarded for this indicator.</td>
<td></td>
<td></td>
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<tr>
<td>157. Time lost due to work-based injuries?</td>
<td>0.5</td>
<td>Source</td>
</tr>
<tr>
<td>In its 2019 annual report the company reports that its Lost Time Injury Frequency Rate improved by 28% from the previous year at Tier-1 facilities - i.e. large manufacturing plants. However, it does not report a figure for Tier-2 operations, which includes &quot;plantations, forest concessions, farms; processing; cotton gins and sawmills; infrastructure business and R&amp;D centres&quot;.</td>
<td></td>
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</tr>
</tbody>
</table>
158. Number of fatalities as a result of work-based accidents?
4 - The company reports that unfortunately there were four fatalities in 2019.

<table>
<thead>
<tr>
<th>Indicator</th>
<th>Score</th>
<th>Notes</th>
</tr>
</thead>
<tbody>
<tr>
<td>Smallholders and suppliers</td>
<td>158</td>
<td>Number of fatalities as a result of work-based accidents?</td>
</tr>
<tr>
<td></td>
<td>159</td>
<td>Commitment to support smallholders?</td>
</tr>
<tr>
<td></td>
<td>160</td>
<td>Programme to support outgrower scheme and/or independent smallholders?</td>
</tr>
<tr>
<td></td>
<td>161</td>
<td>Percentage of outgrower scheme and/or independent smallholders involved in programme?</td>
</tr>
<tr>
<td></td>
<td>162</td>
<td>Process used to prioritise, assess and/or engage suppliers on compliance with company’s policy and/or legal requirements?</td>
</tr>
<tr>
<td></td>
<td>163</td>
<td>Number or percentage of suppliers assessed and/or engaged on compliance with company’s policy and/or legal requirements?</td>
</tr>
<tr>
<td></td>
<td>164</td>
<td>Suspension or exclusion criteria for suppliers?</td>
</tr>
<tr>
<td></td>
<td>165</td>
<td>Timebound action plans (including Key Performance Indicators) for suppliers to be in compliance with timber and pulp sourcing commitments?</td>
</tr>
<tr>
<td></td>
<td>166</td>
<td>Proportion of direct and indirect supply that comes from FMUs which are compliant with timber and pulp sourcing policies?</td>
</tr>
</tbody>
</table>
167. Commitment to ethical conduct and prohibition of corruption?

The company states “Compliance with the Code of Conduct also applies to third parties engaged by you or your team. It is your responsibility to ensure that they do not engage in unethical behaviour when acting on Olam’s behalf.” It states in the Anti-Bribery and Corruption Policy that any “entity that performs services for or on behalf of the Company or any of its subsidiaries or their employees, wherever located (collectively, "Associated Persons") are expected to have and comply with their own ethical business policies or comply with this Policy”.

168. Commitment to ethical conduct and prohibition of corruption applies to all suppliers?

The company provides detail of how it is implementing its Code of Conduct in its 2019 annual report. Reporting of this implementation seems to be self-reported only.

169. Progress on commitment to ethical conduct and prohibition of corruption?

The code of conduct includes a "Incident reporting flowchart" which refers to whistleblowers. The annual report for 2019 explains two mechanisms by which a report can be made, and how whistleblowers are protected. The Code of Conduct and Anti-Bribery and Corruption Policy both refer to an Olam Whistleblowing Policy, but this could not be found.

170. Company has provided valid legal documents to Open Timber Portal on legal registration (at the time of SPOTT assessments)?

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.

171. Disclosure of the company’s management approach to tax and payments to governments?

The company has a grievance procedure and grievance page available for its general business, as well as a separate procedure and grievance submission (on its Engaging and Supporting Communities webpage) available for its CIB operations in RoC.

172. Company has provided valid legal documents to Open Timber Portal on taxes, fees and royalties (at the time of SPOTT assessments)?

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.

173. Whistleblowing procedure?

The company has a grievance procedure and grievance page available for its general business, as well as a separate procedure and grievance submission (on its Engaging and Supporting Communities webpage) available for its CIB operations in RoC.

174. Own grievance or complaints system open to all stakeholders?

Last updated in May 2019 and specific to CIB operations only.

175. Details of complaints and grievances disclosed?

Last updated in May 2019 and specific to CIB operations only.
89 BILLION litres of Australia's H2O as the country suffers its worst drought ever