**HAGL Group**

**Natural rubber assessment**

**Total score:** 12.1%

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

<table>
<thead>
<tr>
<th>Landbank</th>
<th>44,500 hectares</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Activities:</strong> Natural rubber cultivation and processing</td>
<td></td>
</tr>
<tr>
<td><strong>Locations:</strong> Vietnam, Laos, Cambodia</td>
<td></td>
</tr>
<tr>
<td><strong>Headquarters:</strong> Vietnam</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Total:</th>
<th>14.5 / 120</th>
<th>12.1%</th>
</tr>
</thead>
</table>

**Sustainability policy and leadership**

3.5 / 10 35%

1. **Sustainable natural rubber policy or commitment for all its operations?**  
   The company only has a general commitment to sustainable development.
   
   ![X](https://via.placeholder.com/15)
   0 / 1  Source

2. **Sustainability natural rubber policy or commitment applies to all sourcing excluding smallholders?**
   
   ![X](https://via.placeholder.com/15)
   0 / 1

3. **High-level position of responsibility for sustainability?**
   
   ![X](https://via.placeholder.com/15)
   0 / 1

4. **One or more members within the board of the company have responsibility for sustainability?**
   
   ![✓](https://via.placeholder.com/15)
   1 / 1  Source

5. **Percentage or number of women board members?**
   2 (28.6%) - The company does not explicitly report the number or percentage of women board members but provides a list indicating gender.
   
   ![✓](https://via.placeholder.com/15)
   1 / 1  Source

6. **Percentage or number of women in senior management team?**
   35%
   
   ![✓](https://via.placeholder.com/15)
   1 / 1  Source

7. **Member of multiple industry schemes or other external initiatives to reduce negative environmental or social outcomes associated with natural rubber production?**
   
   ![X](https://via.placeholder.com/15)
   0 / 1

8. **Collaboration with stakeholders to reduce negative environmental or social outcomes associated with natural rubber production?**
   
   ![X](https://via.placeholder.com/15)
   0.5 / 1  Source
The company is a member of the General Council of Agriculture and Rural Development of Vietnam which aims to improve farmers' livelihoods and contribute to the agricultural and rural development of Vietnam. However this information is over two years old.

<table>
<thead>
<tr>
<th>Question</th>
<th>Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>9. Sustainability report published within last two years?</td>
<td>✔</td>
</tr>
<tr>
<td>The sustainability report is published as a part of the annual report.</td>
<td></td>
</tr>
<tr>
<td>10. Climate risks assessment available?</td>
<td>✗</td>
</tr>
</tbody>
</table>

- **Landbank, maps and traceability**
  - 11. Lists countries and operations?
    - Vietnam, Cambodia (natural rubber plantations), Laos (natural rubber plantations and processing facility).
  - 12. Total land area managed/controlled for natural rubber (ha)?
  - 13. Total natural rubber planted area (ha)?
    - 47,122
  - 14. Scheme smallholders/outgrowers planted area (ha)?
  - 15. Unplanted (areas designated for future planting) (ha)?
  - 16. Conservation set-aside area, including HCV area (ha)?
    - 50 - Figure is more than five years old.
  - 17. Maps of estates/management units?
  - 18. Number of company owned natural rubber processing facilities?
  - 19. Names and coordinates of company owned natural rubber processing facilities?
  - 20. Management plans for natural rubber production are available for all estates/management units?
  - 21. Commitment to traceability of the whole supply chain?

- **Deforestation and biodiversity**
<table>
<thead>
<tr>
<th>Question</th>
<th>Score</th>
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</thead>
<tbody>
<tr>
<td>22. Commitment to zero deforestation or zero conversion of natural ecosystems?</td>
<td>☒ 0/1</td>
</tr>
<tr>
<td>23. Commitment to zero deforestation or zero conversion of natural ecosystems applies to all sourcing excluding smallholders?</td>
<td>☒ 0/1</td>
</tr>
<tr>
<td>24. Evidence of monitoring deforestation?</td>
<td>☒ 0/1</td>
</tr>
<tr>
<td>25. Amount of illegal/non-complaint deforestation recorded in own operations?</td>
<td>☒ 0/1</td>
</tr>
<tr>
<td>26. Implementing a landscape or jurisdictional level approach?</td>
<td>☒ 0/1</td>
</tr>
<tr>
<td>27. Commitment to biodiversity conservation?</td>
<td>☒ 0/1</td>
</tr>
<tr>
<td>28. Identified species of conservation concern, referencing international or national system of species classification?</td>
<td>☒ 0/1</td>
</tr>
<tr>
<td>29. Examples of species and/or habitat conservation management?</td>
<td>☒ 0/1</td>
</tr>
<tr>
<td>30. Commitment to protect areas from illegal activities?</td>
<td>☒ 0/1</td>
</tr>
<tr>
<td>31. Commitment not to use genetically modified organisms?</td>
<td>☒ 0/1</td>
</tr>
<tr>
<td>32. Commitment to conduct High Conservation Value (HCV) assessments?</td>
<td>☒ 0/1</td>
</tr>
<tr>
<td>33. High Conservation Value (HCV) assessments available?</td>
<td>☒ 0/1</td>
</tr>
<tr>
<td>34. High Conservation Value (HCV) management and monitoring plans available?</td>
<td>☒ 0/1</td>
</tr>
</tbody>
</table>

**HCV, HCS and impact assessments**

<table>
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<tbody>
<tr>
<td>32. Commitment to conduct High Conservation Value (HCV) assessments?</td>
<td>☒ 0/1</td>
</tr>
<tr>
<td>33. High Conservation Value (HCV) assessments available?</td>
<td>☒ 0/1</td>
</tr>
<tr>
<td>34. High Conservation Value (HCV) management and monitoring plans available?</td>
<td>☒ 0/1</td>
</tr>
</tbody>
</table>
35. Commitment to the High Carbon Stock (HCS) approach?  

The company states that before every project it "hired an independent third party to assess the environmental impacts, and introduce measures to mitigate the socio-environmental impacts caused by investment projects then subjected to competent authorities for approval." However no commitment to conduct social and environmental impact assessments was found.

36. Commitment to conduct social and environmental impact assessments (SEIAs)?  

Source

The company states it has provided SEIAs for investors for inspection. However no assessment is publicly available.

37. Social and environmental impact assessment (SEIAs) undertaken, and associated management and monitoring plans?  

Source

The company states that before every project it "hired an independent third party to assess the environmental impacts, and introduce measures to mitigate the socio-environmental impacts caused by investment projects then subjected to competent authorities for approval." However no commitment to conduct social and environmental impact assessments was found.

38. Commitment to no planting on peat of any depth?  

39. Landbank or planted area on peat (ha)?  

40. Implementation of commitment to no planting on peat of any depth?  

41. Commitment to best management practices for soils and peat?  

Source

The company only has a general commitment to Good Agricultural Practices for all activities and only specifically mentions soil preparation.

42. Evidence of best management practices for soils and peat?  

Source

The company only mentions one practice, the Israeli irrigation technique, which it implements to protect soils from erosion and pollution.

43. Commitment to best/sustainable tapping practices?  

Source

The company only states it provides training on tapping practices however tapping practices are not detailed.

44. Evidence of best/sustainable tapping practices?  

Source

The company only states it provides training on tapping practices however tapping practices are not detailed.

45. Commitment to zero burning?  

46. Evidence of management and monitoring fires?  

Source

The company only states it provides fire prevention and firefighting training.
<table>
<thead>
<tr>
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</thead>
<tbody>
<tr>
<td>47. Details/number of hotspots/fires in company estates/management units?</td>
<td>❌ 0/1</td>
</tr>
<tr>
<td>48. Time-bound commitment to reduce greenhouse gas (GHG) emissions intensity?</td>
<td>❌ 0/1</td>
</tr>
<tr>
<td>49. GHG emissions intensity?</td>
<td>❌ 0/1</td>
</tr>
<tr>
<td>50. Report GHG emissions from land use change?</td>
<td>❌ 0/1</td>
</tr>
<tr>
<td>51. Methodology used to calculate GHG emissions?</td>
<td>❌ 0/1</td>
</tr>
<tr>
<td>52. Progress towards commitment to reduce GHG emissions intensity?</td>
<td>❌ 0/1</td>
</tr>
</tbody>
</table>

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<tbody>
<tr>
<td>53. Time-bound commitment to improve water quality (BOD and COD)?</td>
<td>❌ 0/1</td>
</tr>
<tr>
<td>54. Progress towards commitment on water quality (BOD and COD)?</td>
<td>❌ 0/1</td>
</tr>
<tr>
<td>55. Treatment of effluents from processing facilities?</td>
<td>❌ 0/1</td>
</tr>
<tr>
<td>The company states it treats wastewater from rubber processing.</td>
<td></td>
</tr>
<tr>
<td>56. Percentage of processing facilities with closed-loop water treatment system (100%)?</td>
<td>❌ 0/1</td>
</tr>
<tr>
<td>57. Time-bound commitment to improve water use intensity?</td>
<td>❌ 0/1</td>
</tr>
<tr>
<td>The company only has a general commitment to protect water sources.</td>
<td></td>
</tr>
<tr>
<td>58. Water use intensity?</td>
<td>❌ 0/1</td>
</tr>
<tr>
<td>59. Progress towards commitment on water use intensity?</td>
<td>❌ 0/1</td>
</tr>
<tr>
<td>60. Commitment to protect natural waterways through buffer zones?</td>
<td>❌ 0/1</td>
</tr>
<tr>
<td>The company only requires its project partners and subcontractors to respect buffer zones of rivers and waterways designated by local governments.</td>
<td></td>
</tr>
<tr>
<td>61. Implementation of commitment to protect natural waterways through buffer zones?</td>
<td>❌ 0/1</td>
</tr>
<tr>
<td>Question</td>
<td>Score</td>
</tr>
<tr>
<td>------------------------------------------------------------------------</td>
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</tr>
<tr>
<td>62. Reducing odours from natural rubber processing facilities?</td>
<td>× 0/1</td>
</tr>
<tr>
<td>63. Commitment to minimise the use of chemicals, including pesticides and chemical fertilisers?</td>
<td>× 0/1</td>
</tr>
<tr>
<td>64. Commitment to no use of World Health Organisation (WHO) Class 1A and 1B pesticides?</td>
<td>× 0/1</td>
</tr>
<tr>
<td>65. Commitment to no use of chemicals listed under the Stockholm Convention and Rotterdam Convention?</td>
<td>× 0/1</td>
</tr>
<tr>
<td>66. Implementation of commitment to reduce chemical usage?</td>
<td>× 0/1</td>
</tr>
<tr>
<td>67. Integrated Pest Management (IPM) approach?</td>
<td>P 0.5/1 Source</td>
</tr>
<tr>
<td>The company only mentions IPM and that it provides training on this.</td>
<td></td>
</tr>
<tr>
<td>68. Chemical usage per ha or list of chemicals used?</td>
<td>× 0/1</td>
</tr>
<tr>
<td>69. Waste management system in place to avoid negative impacts?</td>
<td>× 0/1</td>
</tr>
<tr>
<td>70. Commitment to human rights?</td>
<td>× 0/1</td>
</tr>
<tr>
<td>71. Commitment to human rights applies to all sourcing excluding smallholders?</td>
<td>× 0/1</td>
</tr>
<tr>
<td>72. Commitment to respect indigenous and local communities' rights?</td>
<td>× 0/1</td>
</tr>
<tr>
<td>73. Commitment to respect legal and customary land tenure rights?</td>
<td>× 0/1</td>
</tr>
<tr>
<td>74. Commitment to free, prior and informed consent (FPIC)?</td>
<td>× 0/1</td>
</tr>
<tr>
<td>75. FPIC commitment applies to all sourcing excluding smallholders?</td>
<td>× 0/1</td>
</tr>
<tr>
<td>76. Details on Free, prior and informed consent (FPIC) process available?</td>
<td>× 0/1</td>
</tr>
</tbody>
</table>

Community, land and labour rights

5.75 / 29 19.8%

6 media reports
| 77. Examples of local stakeholder engagement to prevent conflicts? | ✗ 0/1 |
| 78. Details of process for addressing land conflicts available? | ✗ 0/1 |
| 79. Commitment to support the inclusion of women across natural rubber operations, including addressing barriers faced? | ✗ 0/1 |
| 80. Commitment to mitigate impacts on food security? | ✗ 0/1 |
| 81. Progress on commitment to mitigate impacts on food security? | ✗ 0/1 |
| 82. Commitment to provide essential community services and facilities? | ✓ 1/1 Source |
| 83. Progress on commitment to provide essential community services and facilities? | ✓ 0.75/1 Source  
The company provides examples on community services and facilities provided. |
| 84. Commitment to provide business/work opportunities for local communities? | ✓ 1/1 Source |
| 85. Commitment to respect all workers' rights? | ✗ 0/1 |
| 86. Commitment to Fundamental ILO Conventions or Free and Fair Labour Principles? | ✗ 0/1 |
| 87. Commitment to eliminate gender related discrimination with regards to employment and occupation? | ✓ 1/1 Source |
| 88. Percentage or number of temporary employees? | ✗ 0/1 |
| 89. Percentage or number of women employees? | ✓ 1/1 Source  
40% |
| 90. Commitment to pay at least minimum wage? | ✗ 0/1 |
| 91. Progress on commitment to pay at least minimum wage? | ✗ 0/1 |
| 92. Reporting of salary by gender? | ✗ 0/1 |
| 93. Commitment to address occupational health and safety? | ✓ 1/1 Source |
| 94. Time lost due to work-based injuries? | |
95. Reduction of time lost due to work-based injuries?  

96. Number of fatalities as a result of work-based accidents?  

97. Zero fatalities as a result of work-based accidents?  

98. Provision of personal protective equipment and related training?  

The company states it provides equipment and relevant training however the information is over five years old.

99. Member of the Global Platform for Sustainable Natural Rubber (GPSNR)?  

100. Submitted self-declaration form for the Sustainable Natural Rubber Initiative (SNR-i)?  

101. Commitment to become 100% certified under voluntary sustainability certification scheme?  

102. Certified under voluntary sustainability certification scheme?  

103. Percentage area (ha) FSC certified?  

104. Commitment to support smallholders?  

105. Programme to support scheme smallholders / outgrowers?  

106. Percentage of scheme smallholders / outgrowers involved in programme?  

107. Programme to support independent smallholders?  

108. Percentage of independent smallholders involved in programme?
<table>
<thead>
<tr>
<th>Question</th>
<th>Score</th>
</tr>
</thead>
<tbody>
<tr>
<td>109. Percentage of supply from smallholders?</td>
<td>0/1</td>
</tr>
<tr>
<td>110. Percentage of supply coming from agroforestry?</td>
<td>0/1</td>
</tr>
<tr>
<td>111. Process used to prioritise, assess and/or engage non-smallholder suppliers on compliance with company's policy and/or legal requirements?</td>
<td>0/1</td>
</tr>
<tr>
<td>112. Number or percentage of non-smallholder suppliers assessed and/or engaged on compliance with company’s policy and/or legal requirements?</td>
<td>0/1</td>
</tr>
<tr>
<td>113. Suspension or exclusion criteria for non-smallholder suppliers?</td>
<td>0/1</td>
</tr>
<tr>
<td>114. Process used to engage smallholder suppliers on compliance with company’s policy and/or legal requirements?</td>
<td>0/1</td>
</tr>
<tr>
<td>115. Number or percentage of smallholder suppliers engaged on compliance with company’s policy and/or legal requirements?</td>
<td>0/1</td>
</tr>
</tbody>
</table>

**Governance and grievances**

<table>
<thead>
<tr>
<th>Question</th>
<th>Score</th>
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</thead>
<tbody>
<tr>
<td>116. Commitment to ethical conduct and prohibition of corruption?</td>
<td>0/1</td>
</tr>
<tr>
<td>117. Progress on commitment to ethical conduct and prohibition of corruption?</td>
<td>0/1</td>
</tr>
<tr>
<td>118. Whistleblowing procedure?</td>
<td>0/1</td>
</tr>
<tr>
<td>119. Own grievance or complaints system open to all stakeholders?</td>
<td>0/1</td>
</tr>
<tr>
<td>120. Details of complaints and grievances disclosed?</td>
<td>0/1</td>
</tr>
</tbody>
</table>