

Reforestadora de Palmas de el Peten S.A. (REPSA)

Palm oil
assessment

Total score:

54%

Latest update: October 2019

Next scheduled: November 2020

Parent company:	Grupo HAME
Landbank (oil palm)	20,201 hectares
Bloomberg ticker:	Private
RSPO member?	No
Activities:	Oil palm cultivation, milling
Locations:	Guatemala (Petén)
Headquarters:	Guatemala
Parent website:	http://grupohame.com/
Website:	http://repsa.com.gt/ Sustainability report (2018)

Total:	91.25 / 169	54%
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> Sustainability policy and leadership

7 / 9 77.8%

2 media reports



<input type="checkbox"/> 1. Sustainable palm oil policy or commitment for all its operations?	✓	1 / 1	Source
<input type="checkbox"/> 2. Sustainable palm oil policy or commitment applies to all suppliers?	✓	1 / 1	Source
<input type="checkbox"/> 3. High-level position of responsibility for sustainability? Sustainability Manager.	✓	1 / 1	Source
<input type="checkbox"/> 4. One or more members within the board of the company have responsibility for sustainability? This indicator is disabled as the company is not publicly listed.			
<input type="checkbox"/> 5. Percentage or number of women in senior management team? 20%	✓	1 / 1	Source
<input type="checkbox"/> 6. Percentage or number of women board members? This indicator is disabled as the company is not publicly listed.			
<input type="checkbox"/> 7. Member of multiple industry schemes or other external initiatives to reduce negative environmental			

	✓	1 / 1	Source
or social outcomes associated with palm oil production? UNGC and the Spanish Sustainable Palm Oil Foundation.			
■ 8. Collaboration with stakeholders to reduce negative environmental or social outcomes associated with palm oil production? The company opened an agricultural college which has reportedly educated many local residents in sustainable education practices.	✓	1 / 1	Source
■ 9. Sustainability report published within last two years? The company provides quarterly and annual reports on the implementation of its sustainability action plan.	✓	1 / 1	Source
■ 10. Reports through standardised reporting systems?	✗	0 / 1	
■ 11. Verification report on compliance with POIG Charter, if a POIG member? This indicator is disabled as the company is not a POIG member.			
■ 12. Climate risks assessment available?	✗	0 / 1	



> Landbank, maps and traceability

9 / 14 64.3%

■ 13. Total land area managed/controlled for oil palm (ha)? 20,201.1 - The company provides details about areas under palm oil cultivation in five separate documents, four dated 2017 and one dated 2016.	P	0.5 / 1	Source
■ 14. Total oil palm planted area (ha)? 11,810.3 - The company provides a map which gives this total, but we have been unable to confirm that this represents the entirety of its estate.	P	0.5 / 1	Source
■ 15. Plasma/scheme smallholders planted area (ha)? This indicator is disabled as the company does not source from plasma/scheme smallholders.			
■ 16. Unplanted (areas designated for future planting) (ha)? 0	✗	0 / 1	
■ 17. Conservation set-aside area, including HCV area (ha)? 47.22 - The company provides information on one forest reserve, but this does not cover the known scope of the company's operations and is dated 2016.	P	0.5 / 1	Source
■ 18. Area for infrastructure (ha)? 249.57 - The company provides an infrastructure figure, but ZSL has been unable to confirm whether this represents 100% of the company's operations.	P	0.5 / 1	Source

<input type="checkbox"/> 19. Maps of estates/management units?	P	0.5 / 1	Source
<p>The company provides static image maps of five estate locations, dated 2016 and 2017.</p>			
<input type="checkbox"/> 20. Maps of scheme/plasma smallholders?	<p>This indicator is disabled as the company does not source from plasma/scheme smallholders.</p>		
<input type="checkbox"/> 21. Names and locations of all third-party supplying plantations?	P	0.5 / 1	Source
<p>The company provides a map which shows supplier estates, but it is unclear if this map includes all estates.</p>			
<input type="checkbox"/> 22. Number of company-owned mills?	✓	1 / 1	Source
<p>2</p>			
<input type="checkbox"/> 23. Names and coordinates of company-owned mills?	✓	1 / 1	Source
<input type="checkbox"/> 24. Number (or percentage) of company-owned mills that source from company-owned plantations and/or third-party plantations?	✓	1 / 1	Source
<input type="checkbox"/> 25. Total volumes (or percentages) sourced by company-owned mills that come from company-owned plantations and/or third-party plantations?	✓	1 / 1	Source
<input type="checkbox"/> 26. Number of supplier mills?	<p>This indicator is disabled as the company does not source from supplier mills.</p>		
<input type="checkbox"/> 27. Names and coordinates of all third-party supplying mills?	<p>This indicator is disabled as the company does not source from supplier mills.</p>		
<input type="checkbox"/> 28. Number (or percentage) of third-party supplier mills that source from their own plantations and/or third-party plantations?	<p>This indicator is disabled as the company does not source from supplier mills.</p>		
<input type="checkbox"/> 29. Total volumes (or percentages) sourced from third-party supplier mills that come from their own plantations and/or third-party plantations?	<p>This indicator is disabled as the company does not source from supplier mills.</p>		
<input type="checkbox"/> 30. Total volume (or percentage) sourced for refineries that comes from intermediary traders and/or refiners rather than directly from mills?	<p>This indicator is disabled as the company is not a refiner.</p>		
<input type="checkbox"/> 31. Time-bound commitment to achieve 100% traceability to mill level?	<p>This indicator is disabled as the company does not source from supplier mills.</p>		
<input type="checkbox"/> 32. Percentage of supply traceable to mill level?	<p>This indicator is disabled as the company does not source from supplier mills.</p>		

<p><input checked="" type="checkbox"/> 33. Time-bound commitment to achieve 100% traceability to plantation level?</p>	✓	1 / 1	Source
<p><input checked="" type="checkbox"/> 34. Percentage of fresh fruit bunches (FFB) from own mills traceable to plantation level? 100%</p>	✓	1 / 2	Source
<p><input type="checkbox"/> 35. Percentage of fresh fruit bunches (FFB) from supplier mills traceable to plantation level? This indicator is disabled as the company does not source from supplier mills.</p>			
<p><input type="checkbox"/> 36. Publishes traceability data at refinery level? This indicator is disabled as the company is not a refiner.</p>			
<p><input type="checkbox"/> 37. Publishes traceability data at crusher level? This indicator is disabled as the company does not own crushing facilities.</p>			



> Deforestation and biodiversity

8.5 / 18 17.2%

4 media reports



<p><input checked="" type="checkbox"/> 38. Commitment to zero deforestation or zero conversion of natural ecosystems? The company commits to no development on High Conservation Value (HCV) or High Carbon Stock (HCS) areas. In addition, it commits to no development of peatland and other types of wetlands.</p>	✓	1 / 1	Source
<p><input checked="" type="checkbox"/> 39. Commitment to zero deforestation or zero conversion of natural ecosystems applies to all suppliers? The company commits to no development on High Conservation Value (HCV) or High Carbon Stock (HCS) areas. In addition, it commits to no development of peatland and other types of wetlands.</p>	✓	1 / 1	Source
<p><input type="checkbox"/> 40. Criteria for defining deforestation? The company specifies the types of areas that are not to be deforested as HCS, HCV, peat, but does not state a cut-off date.</p>	P	0.5 / 1	Source
<p><input type="checkbox"/> 41. Evidence of monitoring deforestation?</p>	✗	0 / 2	
<p><input type="checkbox"/> 42. Amount of illegal/non-compliant deforestation recorded in own operations?</p>	✗	0 / 1	
<p><input type="checkbox"/> 43. Amount of illegal/non-compliant deforestation recorded in supplier operations?</p>	✗	0 / 1	
<p><input type="checkbox"/> 44. Commitment to restoration of non-compliant deforestation/conversion? The company commits to providing compensation for deforested areas in line with RSPO guidelines, although it does not provide a cut off date beyond which deforestation would not be accepted.</p>	P	0.5 / 1	Source
<p><input type="checkbox"/> 45. Commitment to restoration of non-compliant deforestation/conversion applies to all suppliers?</p>	✗	0 / 1	

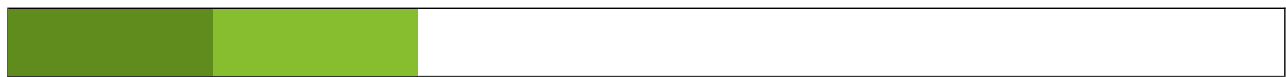
<p>■ 46. Implementing a landscape or jurisdictional level approach?</p>	✓	1 / 2	Source
<p>■ 47. Commitment to biodiversity conservation?</p>	✓	1 / 1	Source
<p>■ 48. Commitment to biodiversity conservation applies to all suppliers?</p>	✓	1 / 1	Source
<p>■ 49. Identified species of conservation concern, referencing international or national system of species classification?</p>	✓	1 / 2	Source
<p>■ 50. Examples of species and/or habitat conservation management? The company has undertaken reforestation of riparian forest.</p>	P	0.5 / 1	Source
<p>■ 51. Commitment to no hunting or only sustainable hunting of species?</p>	✓	1 / 1	Source
<p>■ 52. Commitment to no hunting or only sustainable hunting of species applies to all suppliers?</p>	✗	0 / 1	



> HCV, HCS and impact assessments

6.75 / 14 48.2%

⚠ 1 media report



<p>■ 53. Commitment to conduct High Conservation Value (HCV) assessments?</p>	✓	1 / 1	Source
<p>■ 54. Commitment to conduct High Conservation Value (HCV) assessments applies to all suppliers?</p>	✓	1 / 1	Source
<p>■ 55. High Conservation Value (HCV) assessments for planting undertaken prior to January 2015, and associated management and monitoring plans?</p>	✗	0 / 1	
<p>■ 56. High Conservation Value (HCV) assessments for all estates planted since January 2015? [Externally verified] The company provides a summary of an HCV assessment undertaken in 2018, but it is unclear if it covers all newly planted areas.</p>	P	0.75 / 1	Source
<p>■ 57. High Conservation Value (HCV) management and monitoring plans for all estates planted since January 2015? The company has a management and monitoring plan included as part of a 2018 HCV assessment, but it is unclear if there are plans for other new planted areas.</p>	P	0.5 / 1	Source
<p>■ 58. Commitment to only use licensed High Conservation Value (HCV) assessors accredited by the HCV Resource Network's Assessor Licensing Scheme (ALS)?</p>	✗	0 / 1	Source

	✘ 0 / 1
<p>59. Commitment to only use licensed High Conservation Value (HCV) assessors accredited by the HCV Resource Network's Assessor Licensing Scheme (ALS) applies to all suppliers?</p>	
	✘ 0 / 1 Source
<p>60. Satisfactory review of all High Conservation Value (HCV) assessments undertaken since January 2015 by the HCV ALS Quality Panel? The HCV assessment is still under review.</p>	
	✓ 1 / 1 Source
<p>61. Commitment to the High Carbon Stock (HCS) Approach?</p>	
	P 0.5 / 1 Source
<p>62. Commitment to the High Carbon Stock (HCS) Approach applies to all suppliers? The company's New Planting Protocol document does not extend to all suppliers, but it has another, limited HCS Approach commitment which does. It is unclear whether the New Planting Protocol has superseded the Group Policy.</p>	
	✘ 0 / 1
<p>63. High Carbon Stock (HCS) assessments?</p>	
	✓ 1 / 1 Source
<p>64. Commitment to conduct social and environmental impact assessments (SEIAs)?</p>	
	✘ 0 / 1
<p>65. Commitment to conduct social and environmental impact assessments (SEIAs) applies to all suppliers?</p>	
	✓ 1 / 1 Source
<p>66. Social and environmental impact assessments (SEIAs) undertaken, and associated management and monitoring plans? Externally verified SEIAs and management plans are available.</p>	



> Peat, fire and GHG emissions

8 / 20 40%

⚠ 4 media reports



	P 0.5 / 1 Source
<p>67. Commitment to no planting on peat of any depth? The company commits to no destruction of peatland for any new plantation, but does not specify of any depth.</p>	
	P 0.5 / 1 Source
<p>68. Commitment to no planting on peat of any depth applies to all suppliers? The company commits its suppliers to no destruction of peatland for any new plantation, but does not specify of any depth.</p>	
	✘ 0 / 1
<p>69. Implementation of commitment to no planting on peat of any depth?</p>	
	✘ 0 / 1
<p>70. Landbank or planted area on peat?</p>	
<p>71. Commitment to best management practices for soils and peat?</p>	

	P	0.5 / 1	Source
The company reports having a Soil Conservation Plan, and using a limited selection of practices to prevent erosion and improve soil nutrition, but does not commit to best management practices or mention management of peat.			
	P	0.5 / 1	Source
72. Commitment to best management practices for soils and peat applies to all suppliers?			
The company reports having a Soil Conservation Plan, and using a limited selection of practices to prevent erosion and improve soil nutrition, but does not commit to best management practices or mention management of peat.			
	P	0.5 / 2	Source
73. Evidence of best management practices for soils and peat?			
The company reports it has implemented its Soil Conservation Plan by e.g. establishing vegetation cover, applying organic matter, and enabling drainage. The company does not report implementation of practices for peat.			
	✓	1 / 1	Source
74. Commitment to zero burning?			
	✓	1 / 1	Source
75. Commitment to zero burning applies to all suppliers?			
	✗	0 / 2	
76. Evidence of fire monitoring and management?			
	✗	0 / 1	
77. Details/number of hotspots/fires in company estates?			
	✗	0 / 1	
78. Details/number of hotspots/fires within surrounding landscape/smallholders?			
	P	0.5 / 1	Source
79. Time-bound commitment to reduce greenhouse gas (GHG) emissions intensity?			
The company only has a commitment to reduce general GHG emissions by 6% from 2018-2023, and by 11% 2018-2030, but this is not intensity-based.			
	✓	1 / 1	Source
80. Methodology used to calculate GHG emissions?			
ISCC.			
	P	0.5 / 1	Source
81. Progress towards commitment to reduce GHG emissions intensity?			
The company reports intensity figures for two plants. One plant shows an increase on the previous year (from 662.37 to 670.8 kg CO ₂ e/ton), the other a decrease (from 670.05 to 667.68 kg CO ₂ e/ton), so is not clearly improving.			
	P	0.5 / 1	Source
82. Percentage of mills with methane capture (100%)?			
The company refers to methane capture in the wastewater treatment system of one of its mills.			
	✓	1 / 1	Source
83. GHG emissions intensity?			
The company reports intensity figures for its two plants for 2017-2018: 670.8, 667.68.			
	✗	0 / 1	
84. GHG emissions from land use change?			



 7 media reports


<p>85. Time-bound commitment to improve water use intensity? The company commits to cutting water use intensity to 0.7 m³/tonne by 2020.</p>	✓	1 / 1 Source
<p>86. Progress towards commitment on water use intensity? From April-June 2019 1st Mill: REPSA 1 0.68 m³/metric tonne of FBB 2nd Mill: REPSA 2 1.04 From June - August 2019 1st Mill: REPSA 1 : 0.92 2nd Mill: REPSA 2 : 0.33 As one of the companies mills water use intensity increased in 2019 and the other fell , partial points have been awarded.</p>	P	0.5 / 1 Source
<p>87. Water use intensity? 0.92 m³/tonne/FFB 1st Mill 0.33 m³/tonne/FFB 2nd Mill.</p>	✓	1 / 1 Source
<p>88. Time-bound commitment to improve water quality (BOD and COD)? The company only has a general commitment to avoid discharging untreated water, and to guarantee water quality.</p>	✗	0 / 1 Source
<p>89. Progress towards commitment on water quality (BOD and COD)?</p>	✗	0 / 1
<p>90. Treatment of palm oil mill effluent (POME) and/or palm oil refinery effluent (PORE)? The company reports it treats POME through a wastewater treatment system, and has third party verification of this.</p>	✓	1 / 1 Source
<p>91. Commitment to protect natural waterways through buffer zones?</p>	✓	1 / 1 Source
<p>92. Implementation of commitment to protect natural waterways through buffer zones? The company reports it has reforested riparian zones, protects riparian forest within its Forest Management Plan, and has differentiated management for palm trees within 10 m of water bodies. It has external verification of the early stages of this work.</p>	P	0.75 / 2 Source
<p>93. Commitment to minimise the use of chemicals, including pesticides and chemical fertilisers? The company states it uses integrated pest management to reduce the use of pesticides, and uses mineral fertilisers in an environmentally responsible way, but does not commit to reduce the use of fertilisers.</p>	P	0.5 / 1 Source
<p>94. Commitment to minimise the use of chemicals, including pesticides and chemical fertilisers, applies to all suppliers? The company has a commitment to not use chemical fertilisers, but does not specifically commit to reducing pesticide use.</p>	P	0.5 / 1 Source
<p>95. Implementation of commitment to reduce chemical usage?</p>	P	0.75 / 2 Source

The company reports a 50% reduction in synthetic pest control products since 2016.

<input type="checkbox"/> 96. Chemical usage per ha or list of chemicals used?	✓	1 / 1	Source
<input type="checkbox"/> 97. Commitment to no use of paraquat?	✓	1 / 1	Source
<input type="checkbox"/> 98. Commitment to no use of paraquat applies to all suppliers?	✓	1 / 1	Source
<input type="checkbox"/> 99. Commitment to no use of World Health Organisation (WHO) Class 1A and 1B pesticides?	✓	1 / 1	Source
<input type="checkbox"/> 100. Commitment to no use of World Health Organisation (WHO) Class 1A and 1B pesticides applies to all suppliers?	✓	1 / 1	Source
<input type="checkbox"/> 101. Commitment to no use of chemicals listed under the Stockholm Convention and Rotterdam Convention?	✓	1 / 1	Source
<input type="checkbox"/> 102. Commitment to no use of chemicals listed under the Stockholm Convention and Rotterdam Convention applies to all suppliers?	✓	1 / 1	Source
<input type="checkbox"/> 103. Integrated Pest Management (IPM) approach?	✓	1 / 2	Source



> Community, land and labour rights

28.5 / 46 62%

13 media reports



<input type="checkbox"/> 104. Commitment to human rights?	✓	1 / 1	Source
<input type="checkbox"/> 105. Commitment to human rights applies to all suppliers?	✓	1 / 1	Source
<input type="checkbox"/> 106. Progress on human rights commitment? The company reports that managers, supervisors and heads of area received training on the company's Sustainability Policy, highlighting respect for human rights, labour conditions and labour rights, and that workers also received training sessions on human rights. The company has also worked with consultants to develop a Security Management Plan aligned with the Voluntary Principles on Security and Human Rights.	P	0.75 / 2	Source
<input type="checkbox"/> 107. Commitment to respect legal and customary land tenure rights?	✓	1 / 1	Source
<input type="checkbox"/> 108. Commitment to legal and customary land rights applies to all suppliers?	✓	1 / 1	Source

■ 109. Details of process for addressing land conflicts available?	✗	0 / 1
■ 110. Commitment to respect indigenous and local communities' rights?	✓	1 / 1 Source
■ 111. Commitment to indigenous and local communities' rights applies to all suppliers?	✓	1 / 1 Source
■ 112. Examples of local stakeholder engagement to prevent conflicts?	P	0.75 / 2 Source
■ 113. Commitment to free, prior and informed consent (FPIC)?	✓	1 / 1 Source
■ 114. Commitment to free, prior and informed consent (FPIC) applies to all suppliers?	✓	1 / 1 Source
■ 115. Details of free, prior and informed consent (FPIC) process available?	✓	1 / 1 Source
■ 116. Commitment to support the inclusion of women across palm oil operations, including addressing barriers faced?	✗	0 / 1
■ 117. Commitment to support the inclusion of women across palm oil operations, including addressing barriers faced, applies to all suppliers?	✗	0 / 1
■ 118. Commitment to mitigate impacts on food security?	✓	1 / 1 Source
■ 119. Commitment to mitigate impacts on food security applies to all suppliers?	✗	0 / 1
■ 120. Progress on commitment to mitigate impacts on food security? The company reports it supports training in backyard agriculture and livestock breeding.	P	0.75 / 2 Source
■ 121. Commitment to provide essential community services and facilities?	✓	1 / 1 Source
■ 122. Progress on commitment to provide essential community services and facilities?	✓	1 / 2 Source
■ 123. Commitment to respect all workers' rights?	✓	1 / 1 Source
■ 124. Commitment to respect all workers' rights applies to all suppliers?	✓	1 / 1 Source
■ 125. Progress on commitment to respect all workers' rights? The company reports that permanent and temporary workers were given training on labour conditions and rights.	P	0.75 / 2 Source
■ 126. Commitment to Fundamental ILO Conventions or Free and Fair Labour Principles?		

	✓	1 / 1	Source
Through separate company documents, the company commits to all of the Core Conventions of ILO.			
	✗	0 / 1	
■ 127. Commitment to Fundamental ILO Conventions or Free and Fair Labour Principles applies to all suppliers?			
	✓	1 / 1	Source
■ 128. Commitment to eliminate gender-related discrimination with regards to employment and occupation?			
	✓	1 / 1	Source
■ 129. Commitment to eliminate gender-related discrimination with regards to employment and occupation applies to all suppliers?			
	✓	1 / 1	Source
■ 130. Percentage or number of temporary employees? 806 (31%) - Average number for 2018.			
	✓	1 / 1	Source
■ 131. Percentage or number of women employees? 34 (1.3%) - Based on average number of employees in 2018.			
	✓	1 / 1	Source
■ 132. Commitment to pay at least minimum wage? The company states that it pays the minimum wage established by national legislation.			
	✗	0 / 1	
■ 133. Commitment to pay at least minimum wage applies to all suppliers?			
	✗	0 / 2	
■ 134. Progress on commitment to pay minimum wage?			
	✗	0 / 1	
■ 135. Reporting of salary by gender?			
	✓	1 / 1	Source
■ 136. Commitment to address occupational health and safety?			
	✗	0 / 1	
■ 137. Commitment to address occupational health and safety applies to all suppliers?			
	P	0.75 / 1	Source
■ 138. Reduction of time lost due to work-based injuries? The company reports a 12% reduction in Lost Time Injury Frequency Rate from 2018-2019.			
	✓	1 / 1	Source
■ 139. Time lost due to work-based injuries? 53.25 - Average lost time injury frequency rate (LTIFR) Jan-May 2019. LTIFR is measured in days lost due to incidents per million man-hours worked.			
	P	0.75 / 1	Source
■ 140. Zero fatalities as a result of work-based accidents?			
	✓	1 / 1	Source
■ 141. Number of fatalities as a result of work-based accidents?			

142. Provision of personal protective equipment and related training?

A 2017 report from TFT states that PPE provision and training was implemented, and the company's quarterly reporting in 2019 refers to ongoing activities.



> **Certification standards**

1 / 10 10%

1 media report



143. Member of the Roundtable on Sustainable Palm Oil (RSPO)?

✗ 0 / 1

144. RSPO-certified within three years of joining the RSPO or by November 2010 for companies joining prior to finalisation of the RSPO certification systems in November 2007?

✗ 0 / 1

145. Submitted most recent RSPO Annual Communication of Progress (ACOP)?

✗ 0 / 1

146. Listed all countries and regions in which operates in most recent RSPO Annual Communication of Progress (ACOP)?

✗ 0 / 1

147. Time-bound plan for achieving 100% RSPO certification of estates and mills within five years or achieved 100% RSPO-certification of estates?

✗ 0 / 1 [Source](#)

In 2016 the company reported that it would obtain RSPO certification for two mills and plantations by 2017, but this target was not met.

148. Percentage of area (ha) RSPO-certified?

✗ 0 / 1

149. Percentage of scheme/plasma smallholders (ha) RSPO-certified?

This indicator is disabled as the company does not source from plasma/scheme smallholders.

150. Percentage of mills RSPO-certified?

✗ 0 / 1

151. Time-bound plan for achieving 100% RSPO certification of scheme/plasma/ associated smallholders and outgrowers within five years or target already achieved?

This indicator is disabled as the company has informed ZSL that it does not have schemed smallholders.

152. Percentage of FFB supply (tonnes) from independent smallholders/ outgrowers/third-party FFB suppliers that is RSPO-certified?

✗ 0 / 1

153. Year expected to achieve 100% RSPO certification of all palm product processing facilities?

This indicator is disabled as the company is not a refiner.

154. Percentage of all palm oil and oil palm products handled/traded/ processed (tonnes) that is RSPO-

certified?

This indicator is disabled as the company is not a refiner.

✗ 0 / 1

■ **155. Sells or processes/trades RSPO-certified palm oil through Segregated or Identity Preserved supply chains?**

■ **156. Indonesia Sustainable Palm Oil (ISPO) certified (100%)?**

This indicator is disabled as the company does not operate in Indonesia.

■ **157. Malaysia Sustainable Palm Oil (MSPO) certified?**

This indicator is disabled as the company does not operate in Malaysia.

✓ 1 / 1 [Source](#)

■ **158. Certified under voluntary sustainability certification scheme (e.g. ISCC, SAS, RSB, etc.)?**

The company has ISCC certifications.



> **Smallholders and suppliers**

2 / 8 25%

⚠ 5 media reports



✗ 0 / 1

■ **159. Commitment to support smallholders?**

■ **160. Programme to support scheme/plasma smallholders?**

This indicator is disabled as the company has informed ZSL that it does not have schemed smallholders.

■ **161. Percentage of scheme/plasma smallholders involved in programme?**

This indicator is disabled as the company has informed ZSL that it does not have schemed smallholders.

P 0.75 / 1 [Source](#)

■ **162. Programme to support independent smallholders/outgrowers?**

✗ 0 / 1

■ **163. Percentage of independent smallholders/outgrowers involved in programme?**

P 0.5 / 1 [Source](#)

■ **164. Process used to prioritise, assess and/or engage suppliers on compliance with company's policy and/or legal requirements?**

The company reports that it has an advisory team to assess compliance with agricultural, environmental and occupational health and safety best practices, but limited details about the engagement process are provided.

P 0.75 / 1 [Source](#)

■ **165. Percentage of suppliers assessed and/or engaged on compliance with company requirements?**

The company reports that its advisory team visited all suppliers in 2018 to assess compliance with agricultural, environmental and occupational health and safety best practices.

166. Time-bound plan to engage with all high-risk mills within three years?

This indicator is disabled as the company does not source from mills.

167. Programme to support high-risk mills to become compliant with sourcing policies?

This indicator is disabled as the company does not source from mills.

168. Regularly engages with a subset of high-risk mills?

This indicator is disabled as the company does not source from mills.

169. Procedures in place to assess all own and third-party supplying palm oil mills for risk level?

This indicator is disabled as the company does not source from mills.

170. Regularly assesses and categorises the risk level of all own and third-party supplying mills?

This indicator is disabled as the company does not source from mills.

171. Regularly reports the risk level of all own and third-party supplying mills identified in its supply chain?

This indicator is disabled as the company does not source from mills.

172. Suspension or exclusion criteria for suppliers? ✘ 0 / 1 [Source](#)

173. Time-bound action plans (including Key Performance Indicators) for suppliers to be in compliance with palm oil sourcing commitments? ✘ 0 / 1

174. Proportion of direct and indirect supply that comes from palm oil plantations which are compliant with palm oil sourcing policies? ✘ 0 / 1



> Governance and grievances

55 / 8 68.8%

⚠ 13 media reports



175. Commitment to ethical conduct and prohibition of corruption? ✔ 1 / 1 [Source](#)

176. Commitment to ethical conduct and prohibition of corruption applies to all suppliers? ✔ 1 / 1 [Source](#)

177. Progress on commitment to ethical conduct and prohibition of corruption? ✔ 1 / 2 [Source](#)

The company reports it has implemented 77% of Phase 2 of its Action Plan for ISO 37001 certification, including launching a new code of conduct, a plan to raise awareness and train staff on several policies and codes of conduct, and a pre-audit for certification. Phase 2 is "analysis and development of the system".

178. Disclosure of the company's management approach to tax and payments to governments?

	✘	0 / 1
<p>■ 179. Whistleblowing procedure? The company allows for whistleblowing but no details on the steps taken are reported.</p>	P	0.5 / 1 Source
<p>■ 180. Own grievance or complaints system open to all stakeholders?</p>	✓	1 / 1 Source
<p>■ 181. Details of complaints and grievances disclosed?</p>	✓	1 / 1 Source