SPOTT indicators for assessing palm oil companies

ZSL has revised the SPOTT indicators in consultation with companies, investors and other key stakeholders. SPOTT assesses companies on their transparency, commitments and reported progress towards environmental and social best practice.

<table>
<thead>
<tr>
<th>Revised indicator categories</th>
<th>Alignment with reporting initiatives</th>
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<tbody>
<tr>
<td>1.  Sustainability policy and leadership</td>
<td>SPOTT supports companies in their progress towards improved reporting and greater transparency. This document provides an overview of how the SPOTT indicators align with and help to meet the requirements of the following self-reporting sustainability initiatives:</td>
</tr>
<tr>
<td>2.  Landbank, maps and traceability</td>
<td>- CDP Forest, Climate Change and Water Questionnaires 2016</td>
</tr>
<tr>
<td>4.  HCV, HCS and impact assessment</td>
<td>- Reporting Guidance for Responsible Palm 2017</td>
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<tr>
<td>5.  Peat, fire and GHG emissions</td>
<td>- Roundtable on Sustainable Palm Oil Annual Communication of Progress (RSPO ACOP) 2017</td>
</tr>
<tr>
<td>6.  Water, chemical and pest management</td>
<td>- United Nations Global Compact (UNGC) Self-Assessment Tool</td>
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<tr>
<td>7.  Community, land and labour rights</td>
<td></td>
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<tr>
<td>8.  Certification standards</td>
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<td>9.  Smallholders and suppliers</td>
<td></td>
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<tr>
<td>10. Governance and grievances</td>
<td></td>
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</tbody>
</table>
## 1. Sustainability policy and leadership

### SPOTT indicators

1. Sustainable palm oil policy or commitment for all its operations
2. Policy or commitment applies to direct and third-party suppliers
3. High-level position of responsibility for sustainability
4. Sustainability report published within last two years
5. Member of industry schemes or other external initiatives to improve sustainability or transparency
6. Verification report on compliance with Palm Oil Innovation Group (POIG) Charter, if a POIG member
7. Activities with government and/or non-governmental organisations (NGOs) to improve sustainability

### Alignment with reporting initiatives

#### CDP

- **F0.3** Are there any parts of your direct operations that are excluded from this disclosure?
- **F0.4** Are there any parts of your supply chain that are excluded from this disclosure?
- **F7.1** Please indicate where the highest level of direct responsibility for deforestation risk lies within your organization and detail the frequency and nature of engagement on the issue
- **F8.4** Do you have commodity specific sustainability policies?
- **F9.3** Are you involved in any multi-partnership or stakeholder initiatives relating to the sustainability of these commodities?
- **F10.5** Do you engage in activities that could either directly or indirectly influence the market for sustainable forest risk commodities?

#### GRI

- **102-12** External initiatives a. A list of externally-developed economic, environmental and social charters, principles, or other initiatives to which the organization subscribes, or which it endorses.
- **102-13** Membership of associations a. A list of the main memberships of industry or other associations, and national or international advocacy organizations.
- **102-20** Executive-level responsibility for economic, environmental, and social topics a. Whether the organization has appointed an executive-level position or positions with responsibility for economic, environmental, and social topics.
- **102-50** Reporting period for the information provided.
- **102-51** If applicable, the date of the most recent previous report.

#### Reporting Guidance on Responsible Palm

1. Report whether the company’s palm oil policy applies to:
   - the physical oil the company produces, purchases, and/or trades;
   - the company’s direct suppliers and all of their operations; and/or
   - the company’s subsidiaries, joint ventures, and/or investments.

19. Describe the company’s approach to third party verification of the company’s policy.

21. Describe the company’s participation in external initiatives and activities that aim to support implementation of the company’s policy.

#### UNGC

- **MA.2.A.1** The company has a written policy covering respect for human rights, occupational health and safety, labour rights, environmental and anti-corruption issues.
- **MA.3.A.1** The company has appointed a senior person(s) responsible for policies and plans related to issues covered by the Global Compact principles.
- **MA.3.C.1** The company has defined minimum requirements and communicates these in writing to new and existing suppliers and business partners.
- **EN.2.H.7.** The company works with local and national public authorities as well as with international institutions to address sustainability issues related to natural resources (e.g. wood, water, fish, metals, oil etc.).
### 2. Landbank, maps and traceability

<table>
<thead>
<tr>
<th>SPOTT indicators</th>
<th>Alignment with reporting initiatives</th>
</tr>
</thead>
<tbody>
<tr>
<td>8. Total land area managed/controlled for oil palm in hectares (ha)</td>
<td>Reporting Guidance on Responsible Palm</td>
</tr>
<tr>
<td>9. Total oil palm planted area (ha)</td>
<td>2. Report the total area of the company’s oil-palm landbank.</td>
</tr>
<tr>
<td>10. Plasma/scheme smallholders planted area (ha)</td>
<td>3. Report the percent of physical supply from traceable mills.</td>
</tr>
<tr>
<td>11. Unplanted (areas designated for future planting) (ha)</td>
<td>4. Report the percent of physical supply from traceable estates.</td>
</tr>
<tr>
<td>12. Conservation set-aside area, including High Conservation Value (HCV) area (ha)</td>
<td>5. Report maps with names, coordinates, boundaries and owners of:</td>
</tr>
<tr>
<td>13. Area for infrastructure (ha)</td>
<td>- traceable mills (Quarterly);</td>
</tr>
<tr>
<td>14. Number of company owned mills</td>
<td>- traceable estates; and</td>
</tr>
<tr>
<td>17. Maps of estates/management units</td>
<td></td>
</tr>
<tr>
<td>18. Maps of scheme/plasma smallholders</td>
<td></td>
</tr>
<tr>
<td>19. Time-bound commitment to achieve 100% traceability to mill level</td>
<td></td>
</tr>
<tr>
<td>20. Time-bound commitment to achieve 100% traceability to plantation level</td>
<td></td>
</tr>
<tr>
<td>21. Percentage of supply traceable to mill level</td>
<td></td>
</tr>
<tr>
<td>22. Percentage of fresh fruit bunches (FFB) from own mills traceable to plantation level</td>
<td></td>
</tr>
<tr>
<td>23. Percentage of FFB from supplying mills traceable to plantation level</td>
<td></td>
</tr>
</tbody>
</table>

### Reporting Guidance on Responsible Palm

2. Report the total area of the company’s oil-palm landbank.
3. Report the percent of physical supply from traceable mills.
4. Report the percent of physical supply from traceable estates.
5. Report maps with names, coordinates, boundaries and owners of:
   - traceable mills (Quarterly);
   - traceable estates; and
   - company-owned new plantings and undeveloped concessions.
6. Report the names of the company’s direct palm oil suppliers.

### RSPO ACOP

2.1 Land area controlled and managed associated to palm oil
2.6.1 Number of Palm Oil Mills operated
5.1 With regards to RSPO General Assembly resolution 6g that calls for members to submit maps of their concessions by ACOP 2014 deadline, please upload your estate location concession map(s) in KML or SHP format here

### CDP

F5.1 Do you own or manage land used for the production of any of your selected commodities?
F6.1 Do you have a system in place to track and monitor the origin of raw materials for your selected commodities?
F6.3 Please provide details on the level of traceability your organization has for your selected commodities
F6.3a Please describe your organization’s approach to establishing traceability

### GRI

102-7 Scale of the organization ii. total number of operations
102-9 Supply chain a. A description of the organization’s supply chain, including its main elements as they relate to the organization’s activities, primary brands, products, and services.
304-1 Operational sites owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas:
   i. Geographic location;
   iv. Type of operation (office, manufacturing or production, or extractive);
   v. Size of operational site in km2 (or another unit, if appropriate);
304-3 Habitats protected or restored a. Size and location of all habitat areas protected or restored, and whether the success of the restoration measure was or is approved by independent external professionals.
### 3. Deforestation and biodiversity

#### SPOTT indicators

| 24. Commitment to address deforestation |
| 25. Commitment to zero deforestation |
| 26. Commitment applies to scheme smallholders and independent suppliers |
| 27. Criteria for defining deforestation |
| 28. Evidence of monitoring deforestation |
| 29. Commitment to set aside areas for conservation |
| 30. Evidence of habitat management and/or habitat restoration of set-aside areas |
| 31. A landscape-level approach |
| 32. Commitment to biodiversity conservation |
| 33. Commitment to not endanger species of conservation concern, referencing international or national system of species classification |
| 34. Commitment to no hunting or only sustainable hunting of species |
| 35. Commitment not to operate within internationally and nationally designated protected areas |
| 36. Evidence of species conservation |

#### Alignment with reporting initiatives

<table>
<thead>
<tr>
<th>UNGC</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>EN.2.G.2.</strong> The company is committed to operating within the framework of international conventions addressing biodiversity (e.g. the Convention on Biological Diversity, Cartagena Protocol on Bio-safety and the CITES Convention).</td>
</tr>
<tr>
<td><strong>EN.2.G.3.</strong> The company has assessed important positive and negative impacts of its operations and activities on the natural environment and biodiversity (e.g. IUCN’s Red List of Threatened Species and no alien invasive species).</td>
</tr>
<tr>
<td><strong>EN.2.G.4.</strong> The company has previously and/or is currently taking measures to prevent and reduce the impacts of its operations and activities on biodiversity.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>CDP</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>F2.1</strong> Please select the option that best describes your procedures with regard to assessing deforestation risks and opportunities</td>
</tr>
<tr>
<td><strong>F8.1</strong> Does your organization have a policy that recognizes the role of reducing deforestation for climate change mitigation and sets out clear goals and guidelines for action?</td>
</tr>
<tr>
<td><strong>F8.2</strong> Has your organization made a commitment to reduce or remove deforestation and forest degradation from your direct operations and/or supply chain?</td>
</tr>
<tr>
<td><strong>F8.2a</strong> Please identify which of the following criteria are specifically stated in your organization’s commitment to reduce or remove deforestation and forest degradation from your direct operations and/or supply chain</td>
</tr>
<tr>
<td>- Zero deforestation and forest degradation OR Zero net deforestation and forest degradation</td>
</tr>
</tbody>
</table>

#### GRI

| 304-1 Operational sites owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas |
| vii. Biodiversity value characterized by listing of protected status (such as IUCN Protected Area Management Categories, Ramsar Convention, national legislation). |
| 304-2 Significant impacts of activities, products, and services on biodiversity |
| 304-3 Habitats protected or restored |
| 304-4 IUCN Red List species and national conservation list species with habitats in areas affected by operations |

#### Reporting Guidance on Responsible Palm

11. Report the company’s procedures for new plantings and undeveloped concessions. Detail: Describe procedures for upholding Free, Prior, and Informed Consent (FPIC) and protecting forests and peat lands. Describe the company’s monitoring process and requirements for suppliers’ new plantings and undeveloped concessions.

12. Describe how the company manages set-aside areas and participates in restoration.

13. Describe the spatial monitoring methodology the company uses to evaluate both fires and deforestation.
4. HCV, HCS and impact assessment

SPOTT indicators

37. Commitment to High Conservation Value (HCV) approach
38. Commitment to only use licensed HCV assessors accredited by the HCV Resource Network’s Assessor Licensing Scheme (ALS)
39. Commitment applies to scheme smallholders and independent suppliers
40. HCV assessments undertaken between November 2005 and December 2014, and management and monitoring plans
41. HCV assessments for all estates planted since January 2015
42. HCV management and monitoring plans for all estates planted since January 2015
43. Satisfactory review of all HCV assessments undertaken since January 2016 by the HCV ALS Quality Panel
44. Commitment to the High Carbon Stock (HCS) approach
45. HCS assessments
46. Commitment to conduct social and environmental impact assessments (SEIAs)
47. SEIAs undertaken since November 2005, and management and monitoring plans

Alignment with reporting initiatives

CDP

F2.1a Please provide further details on your risk assessment procedures with regard to deforestation risks and opportunities
F2.1b Please identify which of the following criteria are factored into your organization’s deforestation risk assessments
F8.2a Please identify which of the following criteria are specifically stated in your organization’s commitment to reduce or remove deforestation and forest degradation from your direct operations and/or supply chain

- No peatland conversion OR High Carbon Stock (HCS) management
- Avoidance of land area under conservation OR High Conservation Value (HCV) management

GRI

102-11 Whether and how the organization applies the Precautionary Principle or approach
102-15a. A description of key impacts, risks, and opportunities
304-2 Significant impacts of activities, products, and services on biodiversity
413-1 Operations with local community engagement, impact assessments, and development programs
413-2 Operations with significant actual and potential negative impacts on local communities

UNGC

MA.1.B.1. The company takes an integrated approach to identifying and assessing risk, opportunity and impact, taking into account: human rights; occupational health and safety; labour rights; environmental and anti-corruption issues.
MA.1.B.2. The company has processes in place to ensure periodic identification and assessment of the risk, opportunity and impact of its business operations and activities, based on a review of sound data and a deep understanding of emerging trends.
MA.1.B.4. When designing new operations or activities, the assessment of risk, opportunity and impact is included.
EN.1.A.4. The company conducts systematic risk assessments of materials used, products and processes to apply the precautionary approach.
EN.2.G.3. The company has assessed important positive and negative impacts of its operations and activities on the natural environment and biodiversity (e.g. IUCN’s Red List of Threatened Species and no alien invasive species).
HU.4.C.2. The company communicates and consults with local communities prior to, during and after commencing activities to prevent, reduce and mitigate impacts.

Reporting Guidance on Responsible Palm

11. Report the company’s procedures for new plantings and undeveloped concessions.

Detail: Describe procedures for upholding Free, Prior, and Informed Consent (FPIC) and protecting forests and peatlands. Report whether the company implements the High Carbon Stock Approach (HCSA) and the hectares of new development that have completed the HCS Approach Peer Review Process within the previous year. Describe the company’s monitoring process and requirements for suppliers’ new plantings and undeveloped concessions.
### SPOTT indicators

| 48. Commitment to no planting on peat of any depth |
| 49. Commitment applies to scheme smallholders and independent suppliers |
| 50. Commitment to best management practices for soils and/or peat |
| 51. Landbank or planted area on peat (ha) |
| 52. Evidence of best management practices for soils and/or peat |
| 53. Commitment to zero burning |
| 54. Commitment applies to scheme smallholders and independent suppliers |
| 55. Evidence of management and monitoring fires |
| 56. Details/number of hotspots/fires in company estates |
| 57. Details/number of hotspots/fires within surrounding landscape/smallholders |
| 58. Time-bound commitment to reduce greenhouse gas (GHG) emissions |
| 59. Commitment applies to scheme smallholders and independent suppliers |
| 60. GHG emissions |
| 61. GHG emissions from land use change |
| 62. Methodology used to calculate GHG emissions |
| 63. Progress towards commitment to reduce GHG emissions |
| 64. Percentage of mills with methane capture |

### Alignment with reporting initiatives

#### UNGC

**EN.2.A.2.** The company has a climate strategy that identifies opportunities to reduce the company’s energy consumption and/or emissions of greenhouse gases.

**EN.2.A.5.** The company monitors its energy consumption and/or emissions of greenhouse gases.

**EN.2.A.6.** The company has defined a baseline for its greenhouse gas emissions, which includes a definition of the business operations and activities, and the greenhouse gases that are accounted for e.g. as described in the Greenhouse Gas Protocol.

**EN.2.A.7.** The company has targets for reducing its energy consumption and/or emissions of greenhouse gases.

**EN.2.D.4.** The company treats relevant pollutants before they are emitted to the atmosphere (e.g. by using filters).

**EN.2.D.5.** The company continuously attempts to prevent and reduce air emissions.

**EN.2.H.4.** The company continuously attempts to prevent, minimise and remedy significant impacts on natural resources through environmentally friendly methods and alternative resource use.

#### RSPO ACOP

6.1 Are you currently assessing your operational GHG emissions?

6.1.1 How are you reporting your GHG reporting results

#### GRI

**305-1** Direct (Scope 1) GHG emissions

- a. Gross direct (Scope 1) GHG emissions in metric tons of CO₂ equivalent
- g. Standards, methodologies, assumptions, and/or calculation tools used

**305-5** Reduction of GHG emissions

#### CDP

**F8.1** Does your organization have a policy that recognizes the role of reducing deforestation for climate change mitigation and sets out clear goals and guidelines for action?

**F8.2a** Please identify which of the following criteria are specifically stated in your organization’s commitment to reduce or remove deforestation and forest degradation from your direct operations and/or supply chain

- No peatland conversion OR High Carbon Stock (HCS) management

**CC3.1** Did you have an emissions reduction or renewable energy consumption or production target that was active (ongoing or reached completion) in the reporting year?

**CC3.1e** For all of your targets, please provide details on the progress made in the reporting year

**CC7.2** Please give the name of the standard, protocol or methodology you have used to collect activity data and calculate Scope 1 and Scope 2 emissions

**CC8.2** Please provide your gross global Scope 1 emissions figures in metric tonnes CO₂e

#### Reporting Guidance on Responsible Palm

11. Report the company’s procedures for new plantings and undeveloped concessions. Detail: Describe procedures for upholding Free, Prior, and Informed Consent (FPIC) and protecting forests and peat lands.

13. Describe the spatial monitoring methodology the company uses to evaluate both fires and deforestation.

14. Report the company’s annual GHG emissions from company-owned operations related to palm oil, including from land use change.
### 6. Water, chemical and pest management

**SPOTT indicators**

65. Commitment to manage water use and water quality  
66. Time-bound commitments to improve water use and water quality  
67. Progress towards commitment on water use  
68. Progress towards commitment on water quality  
69. Protection of natural waterways through buffer zones  
70. Evidence of treating palm oil mill effluent (POME)  
71. Commitment to minimise the use of chemicals, including pesticides and chemical fertilisers  
72. No use of paraquat  
73. No use of World Health Organisation (WHO) Class 1A and 1B pesticides  
74. No use of chemicals listed under the Stockholm Convention and Rotterdam Convention  
75. Integrated Pest Management (IPM) approach  
76. Chemical usage per ha or list of chemicals used

### Alignment with reporting initiatives

**UNGC**

- **EN.2.H.4.** The company continuously attempts to prevent, minimise and remedy significant impacts on natural resources through environmentally friendly methods and alternative resource use.
- **EN.2.B.2.** The company treats waste water before discharge to reduce adverse environmental impacts. If waste water treatment takes place outside the company’s premises, the company is aware of the effectiveness of the treatment.
- **EN.2.B.4.** The company has targets for reducing water consumption and/or increasing the amount of water reused or recycled in different business operations and activities.
- **EN.2.F.2.** The company does not manufacture, trade and/or use chemicals and other dangerous substances subject to national or international bans or phase-outs.
- **EN.2.F.4.** The company monitors the quantities of all chemicals and other dangerous substances used in production and maintenance.

**CDP**

- **W1.2** For your total operations, please detail which of the following water aspects are regularly measured and monitored and provide an explanation as to why or why not
- **W1.2a** Water withdrawals: for the reporting year, please provide total water withdrawal data by source, across your operations
- **W1.2b** Water discharges: for the reporting year, please provide total water discharge data by destination, across your operations
- **W1.2c** Water consumption: for the reporting year, please provide total water consumption data, across your operations
- **W6.3** Does your organization have a water policy that sets out clear goals and guidelines for action?
- **W8.1** Do you have any company wide targets (quantitative) or goals (qualitative) related to water?
- **W8.1b** Please describe any company wide qualitative goals (ongoing or reached completion during the reporting period) and your progress in achieving these.

**GRI**

- **303-1** Water withdrawal by source
- **303-2** Water sources significantly affected by withdrawal of water
- **303-3** Water recycled and reused
- **306-1** Water discharge by quality and destination
# 7. Community, land and labour rights

<table>
<thead>
<tr>
<th>SPOTT indicators</th>
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<tbody>
<tr>
<td>77. Commitment to human rights, referencing the United Nations (UN) Declaration of Human Rights or UN Guiding Principles on Business and Human Rights</td>
</tr>
<tr>
<td>78. Commitment to respect legal and customary land tenure rights</td>
</tr>
<tr>
<td>79. Commitment to respect indigenous and local communities’ rights</td>
</tr>
<tr>
<td>80. Commitment to free, prior and informed consent (FPIC)</td>
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<tr>
<td>81. Commitment applies to independent suppliers</td>
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<tr>
<td>82. Free, prior and informed consent (FPIC) process</td>
</tr>
<tr>
<td>83. Process for addressing land conflicts</td>
</tr>
<tr>
<td>84. Commitment to ensure food security for local communities</td>
</tr>
<tr>
<td>85. Commitment to respect workers’ rights, including all workers (i.e. direct, indirect, migrant, temporary, casual, etc.)</td>
</tr>
<tr>
<td>86. Reference to International Labour Organisation (ILO) Fundamental Conventions or Free and Fair Labour Principles</td>
</tr>
<tr>
<td>87. Total number of employees</td>
</tr>
<tr>
<td>88. Percentage of temporary employees</td>
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<tr>
<td>89. Percentage of women employees</td>
</tr>
<tr>
<td>90. Minimum wage that the company pays</td>
</tr>
</tbody>
</table>

## Alignment with reporting initiatives

### GRI

- **411** The reporting organization shall report its management approach for the rights of indigenous peoples
- **412** The reporting organization shall report its management approach for human rights assessment
- **413-1** Operations with local community engagement, impact assessments, and development programs
- **102-7** Scale of the organization
  - i. total number of employees;
- **102-8** Information on employees and other workers
  - a. Total number of employees by employment contract (permanent and temporary), by gender.
- **202-1** Ratios of standard entry level wage by gender compared to local minimum wage
- **403-2** Types of injury and rates of injury, occupational diseases, lost days, and absenteeism, and number of work-related fatalities
- **406** The reporting organization shall report its management approach for non-discrimination
- **407** The reporting organization shall report its management approach for freedom of association and collective bargaining
- **408** The reporting organization shall report its management approach for child labor
- **409** The reporting organization shall report its management approach for forced or compulsory labor

### Reporting Guidance on Responsible Palm

8. Describe the company’s efforts to monitor and support legal land tenure.

10. Report how the company is addressing land conflicts in its own operations.

11. Report the company’s procedures for new plantings and undeveloped concessions. Detail: Describe procedures for upholding Free, Prior, and Informed Consent (FPIC) and protecting forests and peat lands.

16. Report labor-related information according to the free and fair labor principles for company-owned mills and plantations.

### CDP

F8.2a Please identify which of the following criteria are specifically stated in your organization’s commitment to reduce or remove deforestation and forest degradation from your direct operations and/or supply chain

- Free, Prior and Informed Consent (FPIC)
### 7. Community, land and labour rights (continued)

#### SPOTT indicators (continued)

<table>
<thead>
<tr>
<th>Indicator</th>
<th>Description</th>
</tr>
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<tbody>
<tr>
<td>91. Commitment to address occupational health and safety</td>
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<tr>
<td>92. Lost time accident rate</td>
<td></td>
</tr>
<tr>
<td>93. Number of fatalities as a result of work-based accidents</td>
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<tr>
<td>94. Provision of personal protective equipment and pesticide training</td>
<td></td>
</tr>
</tbody>
</table>

#### Alignment with reporting initiatives

**UNGC**

- **MA.2.A.1.** The company has a written policy covering respect for human rights, occupational health and safety, labour rights, environmental and anti-corruption issues.
- **MA.1.B.5.** The company ensures that all information on the potential risks, opportunities and impacts of its business operations are shared and accessible to potentially affected individuals or communities.
- **HU.1.A.1.** The company has effective health and safety procedures in place, which comply with industry, national and international standards.
- **HU.1.B.1.** The company has a procedure to ensure that all workers are provided, free of charge or deposits, with the protective equipment necessary to safely perform their job functions.
- **HU.1.C.5.** Health and safety accidents are monitored including hours lost as a result of injury or illness and e.g. compared to total hours worked (lost time injury frequency).
- **HU.2.B.1.** It is company policy to provide workers with a living wage sufficient to meet basic food, clothing and housing needs and provide some discretionary income for themselves and their dependents.
- **HU.4.A.1.** Prior to buying, renting, acquiring or otherwise accessing land or property, whether directly or through a third party, the company identifies all existing owners and users of the land or property, including information land users and customary owners.
- **HU.4.A.3.** The company consults with affected users and owners of the land or property (including women, tenants, settlers, minorities and other vulnerable groups including indigenous peoples) and seeks their free, prior and informed consent before continuing to acquire or access the land or property.
- **HU.4.A.4.** The company ensures that its lease or purchase of residential property and sourcing of food commodities does not considerably make housing and food scarce or too expensive for the local people.
- **HU.4.C.1.** The company has a commitment to engage openly with communities in and around its area of operations, prior to, during and after commencing activities that may negatively impact their access to resources (e.g. water, food, land) or livelihoods (e.g. fishing or hunting grounds).
- **LA.1.A.1.** The company has a commitment to recognise the rights of its workers to freedom of association and collective bargaining, including the right to freely form and/or join independent trade unions, and this commitment is clearly communicated to all employees.
- **LA.2.A** Does the company take all necessary measures to ensure that it does not participate in any form of forced or bonded labour?
- **LA.3.A** Does the company comply with minimum age standards?
- **LA.4.A.2.** It is company policy to ensure that decisions concerning hiring, wages, promotion, training, discipline, retirement and termination are based only on unbiased criteria, and are not linked to any of the discriminatory characteristics listed in the description for this question.
8. Certification standards

### SPOTT indicators

- 95. Member of the Roundtable on Sustainable Palm Oil (RSPO)
- 96. Submitted most recent RSPO Annual Communication of Progress (ACOP)
- 97. Listed all countries and regions in which it operates in most recent RSPO Annual Communication of Progress (ACOP)
- 98. Time-bound plan for achieving 100% RSPO certification of estates within five years or achieved 100% RSPO-certification of estates
- 99. Time-bound plan for achieving 100% RSPO certification of scheme/associated smallholders within five years or achieved 100% RSPO-certification of scheme/associated smallholders
- 100. Time-bound plan for achieving 100% RSPO certification of all supply chains
- 101. 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
- 102. Percentage of mills RSPO-certified
- 103. Percentage of area (ha) RSPO-certified
- 104. Percentage of FFB supply from scheme/associated smallholders that is RSPO-certified
- 105. Percentage of FFB supply from independent suppliers that is RSPO-certified

### Alignment with reporting initiatives

#### CDP

- **F9.4** Do you specify any third party certification schemes for your selected commodities? Please indicate the percentage of total production and/or consumption currently certified
- **F9.5** Do you have any quantified targets for third party certified materials in your direct operations and/or supply chains?

#### UNGC

- **MA.3.A.8.** The company has a company-wide management system that is certified by a third party and/or operates in accordance with sector specific codes and standards.
- **EN.H** Does the company ensure that natural resources are used in a sustainable manner?

### Reporting Guidance on Responsible Palm

- **18.** Report the percent of the company’s total palm oil supply that is from smallholders.
- **20.** Report the percent of the company’s supply that is certified.

### RSPO ACOP

- **2.2.2** Total certified area
- **2.3** In which countries are your estates?
- **2.5.2** Please choose from the list below if you have smallholders and/or outgrowers as part of your supply base?
  - Total FFB volume that is supplied
  - FFB volume supplied that is certified
- **2.6.2** Number of Palm Oil Mills certified
- **3.1** Which supply chain options do you sell RSPO-certified palm oil products through?
- **4.1** Year of first RSPO estate certification (planned or achieved)
- **4.2** Year expected to achieve 100% RSPO certification of estates
- **4.4** Year expected to achieve 100% RSPO certification of scheme and associated smallholders and outgrowers

### Additional indicators

- **106.** Percentage of all palm oil and oil palm products handled/traded/processed that are RSPO-certified
- **107.** Sells or processes/trades RSPO-certified palm oil through Segregated or Identity Preserved supply chains
- **108.** Indonesia Sustainable Palm Oil (ISPO) certified
- **109.** Malaysia Sustainable Palm Oil (MSPO) certified
- **110.** Certified under voluntary sustainability certification scheme (e.g. ISCC, SAN, RSB, etc.)
## 9. Smallholders and suppliers

### Alignment with reporting initiatives

<table>
<thead>
<tr>
<th>SPOTT indicators</th>
<th>GRI</th>
<th>Reporting Guidance on Responsible Palm</th>
<th>RSPO ACOP</th>
<th>UNGC</th>
<th>CDP</th>
</tr>
</thead>
<tbody>
<tr>
<td>111. Programme to support scheme smallholders</td>
<td>102-10 Significant changes to the organization’s size, structure, ownership, or supply chain, including:</td>
<td>9. Describe the company’s methodology for prioritizing, assessing, and engaging suppliers, refineries, and/or mills.</td>
<td>9.1 Are you currently supporting any independent smallholder groups?</td>
<td>MA.3.C.2. The company has policies and procedures for managing and monitoring the performance of suppliers and business partners.</td>
<td>F10.2 Are you working with smallholders to encourage and support sustainable forest management practices?</td>
</tr>
<tr>
<td>112. Details of support programme for scheme smallholders</td>
<td>102-40 A list of stakeholder groups engaged by the organization.</td>
<td></td>
<td>9.2 How are you supporting them?</td>
<td>MA.3.C.3. The company has conducted an assessment to identify which of its suppliers and business partners have the greatest risk of negative impacts.</td>
<td>F10.3 Are you working with your direct suppliers to support and improve their capacity to supply sustainable materials?</td>
</tr>
<tr>
<td>113. Number or percentage of scheme smallholders involved in programme</td>
<td>102-42 The basis for identifying and selecting stakeholders with whom to engage</td>
<td></td>
<td>9.3 When do you plan to start your support for independent smallholders?</td>
<td>MA.3.C.6 Where necessary, the company collaborates with individual suppliers and business partners to implement continuous improvements.</td>
<td>F10.4 Are you working beyond the first tier of your supply chain to manage and mitigate risk?</td>
</tr>
<tr>
<td>114. Programme to support independent smallholders</td>
<td>102-43 The organization’s approach to stakeholder engagement, including frequency of engagement by type and by stakeholder group, and an indication of whether any of the engagement was undertaken specifically as part of the report preparation process.</td>
<td></td>
<td></td>
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</tr>
<tr>
<td>115. Details of support programme for independent smallholders</td>
<td>308-1 New suppliers that were screened using environmental criteria</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>116. Number or percentage of independent smallholders involved in programme</td>
<td>308-2 Negative environmental impacts in the supply chain and actions taken</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>117. Process used to prioritise, assess and/or engage suppliers on compliance with company’s policy and/or legal requirements</td>
<td>a. Number of suppliers assessed for environmental impacts</td>
<td></td>
<td></td>
<td></td>
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</tr>
<tr>
<td>118. Suspension or exclusion criteria for suppliers</td>
<td>d. Percentage of suppliers identified as having significant actual and potential negative environmental impacts with which improvements were agreed upon as a result of assessment.</td>
<td></td>
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<td></td>
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</tr>
<tr>
<td>119. Number or percentage of suppliers assessed and/or engaged</td>
<td>e. Percentage of suppliers identified as having significant actual and potential negative environmental impacts with which relationships were terminated as a result of assessment, and why.</td>
<td></td>
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</tr>
</tbody>
</table>

### Reporting Guidance on Responsible Palm

9. Describe the company’s methodology for prioritizing, assessing, and engaging suppliers, refineries, and/or mills.

17. Describe the scope and impact of the company’s programs to support smallholders.
### 10. Governance and grievances

#### SPOTT indicators

<table>
<thead>
<tr>
<th>Indicator</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>120. Commitment to ethical conduct and prohibition of corruption</td>
<td></td>
</tr>
<tr>
<td>121. Whistleblowing procedure</td>
<td></td>
</tr>
<tr>
<td>122. Own grievance or complaints system</td>
<td></td>
</tr>
<tr>
<td>123. Accessible to internal stakeholders (i.e. employees)</td>
<td></td>
</tr>
<tr>
<td>124. Accessible to external stakeholders</td>
<td></td>
</tr>
<tr>
<td>125. Grievances, if anonymity not requested, including the following details: date, issue, complainant category, actions taken, and status</td>
<td></td>
</tr>
</tbody>
</table>

#### Alignment with reporting initiatives

<table>
<thead>
<tr>
<th>GRI</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>102-16</td>
<td>A description of the organization’s values, principles, standards, and norms of behavior.</td>
</tr>
</tbody>
</table>
| 102-17 | A description of internal and external mechanisms for:  
  - seeking advice about ethical and lawful behavior, and organizational integrity;  
  - reporting concerns about unethical or unlawful behavior, and organizational integrity |
| 102-34 | Communicating critical concerns  
a. Total number and nature of critical concerns that were communicated to the highest governance body.  
b. Mechanism(s) used to address and resolve critical concerns. |

<table>
<thead>
<tr>
<th>UNGC</th>
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</tr>
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<tbody>
<tr>
<td>AC.1.A.2</td>
<td>The company has a policy rejecting corruption and requiring all directors, managers and workers worldwide to behave ethically and in conformity with the law.</td>
</tr>
<tr>
<td>MA.3.E.1</td>
<td>The company has a written procedure for how concerns and complaints are received, processed and settled.</td>
</tr>
<tr>
<td>MA.3.E.2</td>
<td>Information about how to use the procedure; what concerns/complaints can be reported; and how concerns/complaints are processed and resolved, is clear and easily accessible.</td>
</tr>
<tr>
<td>MA.3.E.3</td>
<td>Workers, including temporary and contract workers, can submit concerns/complaints regarding the company’s activities and impact without threat of retaliation by management or other workers.</td>
</tr>
<tr>
<td>MA.3.E.4</td>
<td>Customers and external stakeholders can submit concerns/complaints regarding the company’s activities and impact without threat of retaliation by company management.</td>
</tr>
<tr>
<td>MA.3.E.5</td>
<td>Individuals or representatives of the local community can submit concerns/complaints regarding the company’s activities and impact without threat of retaliation by the company.</td>
</tr>
</tbody>
</table>

#### Reporting Guidance on Responsible Palm

7. Describe the company’s grievance process and report a list of grievances pertinent to the company's palm oil policy.

15. Describe the social and human rights issues in the company’s operations and supply chain, and how the company identifies, assesses, prevents, and addresses such issues.