Palm Oil Innovation Group Verification Report

For

[Agropalma Group]

In

[Tailândia, Acará and Tomé-Açú/Pará, Brazil]

Certification Body: IBD Certificações Ltda.

Verification Dates: September 6th to 11th, 2021

Verification Type: Annual Surveillance Audit

Draft Report Date: 11 Oct 2021

Final Report Date: 31 January 2022

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Executive Summary

Agropalma´s POIG audit was made combining with RSPO audit from September 6th to 11th, 2021 by an interdisciplinary audit team composed by Ricardo Alexandre Zerlin and Andrey Dunkel Bonalume. The team did not have a female representation this year as Andressa Keller who was supposed to be part of the team contracted Covid-19, and we were not able to mobilise other female auditors residing outside of Brazil due to travel restrictions.

The audit was made at Amapalma; Agropalma; CRAI/Agropar and Parapalma and CPA mills located in Tailândia and Acará/PA. At Agropalma and Parapalma´s mills was received Conventional FFB that was segregated, but at this audit theses farmers were integrated to the certification.

As a strategy to evidence the conformity with RSPO and POIG Standards was made interviews with managers, coordinators, and Agropalma´s workers at mills and fields considering the importance and hazardous activities developed. Beyond that, was interviewed employees of subcontractor companies that realize transportation, maintenance, patrimonial surveillance, food service and responsible for the health plan. For topics related with gender aspects the interviews was made preferentially by Ricardo Alexandre Zerlin, respecting the confidential and without presence of Agropalma´s managers.

Verification Result

No non-conformities was verified as result of documentation analysis and interviews made with managers, coordinators, and Agropalma´s workers, Union and Communities representative.

List of Abbreviations

FFB – Fresh Fruit Bunch;

CEB – Center of Endemism of Belem;

BOD – Biological Oxygen Demand;

1. SCOPE OF THE VERIFICATION

1.1 Normative References

The Plantation and supply base was evaluated against the following documents:

☒ Roundtable on Sustainable Palm Oil [Version]
☒ Palm Oil Innovation Group Charter Verification Indicators – March 2016

1.2 Organisation and Contact Details

Company name:	Agropalma Group
Business address:	Alameda Santos, 466 – 10o andar, ZIP CODE: 01418-000, São Paulo, Brazil
Contact person:	Mr. Tulio Dias
Telephone:	+55 11 2505 6400
E-mail:	tuliodias@agropalma.com.br
Website:	www.agropalma.com.br

1.3 Audit Type

Audit Date	**September 6th to 11th, 2021**
Audit Type	**Main evaluation**

1.4 RSPO and other Certifications

RSPO certification	1-0003-04-000-00
Other certifications held	DNV: FSSC 22000. IBD Organic. Ecosocial. JAS organic. BioSuisse, USDA Organic

1.5 General Description of Supply Base

The FFB supply base for the Agropalma Group mills (Crai/Agropar, Amapalma, Agropalma, CPA mills and Parapalma) comes from Agropalma S.A. own land composed by 8 agricultural sectors, leased land managed by Agropalma S.A. and 234 outgrowers (family farmers and integrated growers), as seen in the table below. All of the above mentioned FFB suppliers are covered by the certificate scope.

Currently there are 203 family farmers, divided on 5 projects (I, II, III, IV and V) where each of the families/grower owns from 4 ha to 12.48 ha and 43 integrated outgrowers with oil palm planted areas between 30 ha and 2.200 ha.

The Company has commercial long-term contracts with all of them. Some family farmers/growers are organized in associations managed by a board of directors, commanded by a president. Each family farmer is responsible for managing his/her own plantation. Agropalma S.A. provides technical assistance to each of the growers through a team of professionals. Each of the growers is visited at least once a month and receives support in different areas as good agricultural practices, crop management, compliance with legal requirements, monthly price of FFB, compliance with RSPO certification system and standards and others. Through the signed contract each of the growers agree to manage their oil palm plantation according to the agronomic advice given by Agropalma S.A. and in compliance with the RSPO applicable requirements.

Any of the mills Crai/Agropar, Amapalma, Agropalma and Parapalma can receive and process FFB from any source of its certified supply base, the assignement of FFB to a mill is determined by Agropalma S.A. personnel in charge of programming the production. Parapalma and Agropalma, additionaly can receive FFB from non-certified source and process them together with RSPO certified FFB and produced as conventional.

Certified outgrowers are located in the localities of Moju, Tomé-Acú and Tailandia as the land owned by Agropalma S.A. is located in Tailandia and land leased by Agropalma and managed by Agropalma S.A. is located in Moju, all of them in the counties of Tailandia and Acará, state of Pará.

1.6 Location

Mill/Estate	Physical Address	Longitude	Latitude
Crai/Agropar Mill	Road PA 150, KM74, Direito - Tailândia, PA – Brasil	48°47’47.85ºW	2°31’36.34”S

Amapalma Mill	Road PA 150, KM74, Direito - Tailândia, PA – Brasil	48°47’49.86ºW	2°31’29.59”S
Agropalma Mill	Road PA 150, KM74, Direito - Tailândia, PA – Brasil	48°42’17.65ºW	2°32’34.06”S
CPA/Palmares Mill	Rodovia PA 150 Km 50, Esquerdo, Acará – PA – Brazil	48°35’11.78ºW	2°15’10.54”S
Parapalma Mill	Rodovia PA 150 Km 74, esquerdo. Tailândia, PA. - Brasil	48°42'27.0"W	2°32'40.9"S
Departamento I	Rodovia PA 150 Km 74, esquerdo. Tailândia, PA. - Brasil	48° 47’18”W	2°31’41”S
Departamento II	Rodovia PA 150 Km 74, esquerdo. Tailândia, PA. - Brasil	48° 43’50”W	2°32’57”S
Departamento III	Rodovia PA 150 Km 74, esquerdo. Tailândia, PA. - Brasil	48° 49’35”W	2°34’47”S
Departamento IV	Rodovia PA 150 Km 94, Direito. Moju/PA	48° 54’15”W	2°39’11”S
Departamento V	Rodovia PA 150 Km 65, Esquerdo. Tailândia/PA	48° 43’37”W	2°29’32”S
Departamento VI	Rodovia PA 150, Km 50, Acará/PA	48° 45’10”W	2°15’03”S
Departamento VII/XV	Rodovia PA 150 Km 74, Esquerdo. Tailândia/PA	48° 34’36”W	2°35’48”S
Departamento VIII/XVI	Rodovia PA 150 Km 74, Esquerdo. Tailândia/PA	48° 38’44”W	2°33’16”S
Area Leased from Altino	Moju	48°57'59,24"W	2°30'35,74"S
192 Family Farmers and 41 Integrated Outgrowers	Tailândia, Moju and Tome-Açú	Several	Several

1.7 Supply Base Statistics

Name	Plantation Area (Ha)		Annual FFB yield	Year(s) Planted	Date of Next Planting
	Total	Planted			
Departamento I	6.206,08	5.630,55	80.663	2019; 2018 2017 2013 2010 1988	25
Departamento II	5.222,30	5.222,30	84.220	2019 2013 2012	25

				2010 1999 1994 1993 1992 1991	
Departamento III	4.163,47	4.163,47	56.912	1999 1998 1997 1996 1995	25
Departamento IV	5.934	5.934	111.764	2001 2000 1999 1998	25
Departamento V	6.465,57	6.465,57	94.440	2016 2015 2011 2010 2007 2004 2002 2001	25
Departamento VI	4.101,22	4.020,56	30.945	2019 2017 2016 2015 2012 2011 2001 2001 2000 1996;199 0;1989	25
Departamento XV	4.259	4.259	70.586	2010 2009 2008 2006	25
Departamento XVI	3.307	3.089,87	57.283	2010 2009 2008 2007	25
	505,06	505,06	9.942	2010 2009 2005 2004 2003	25

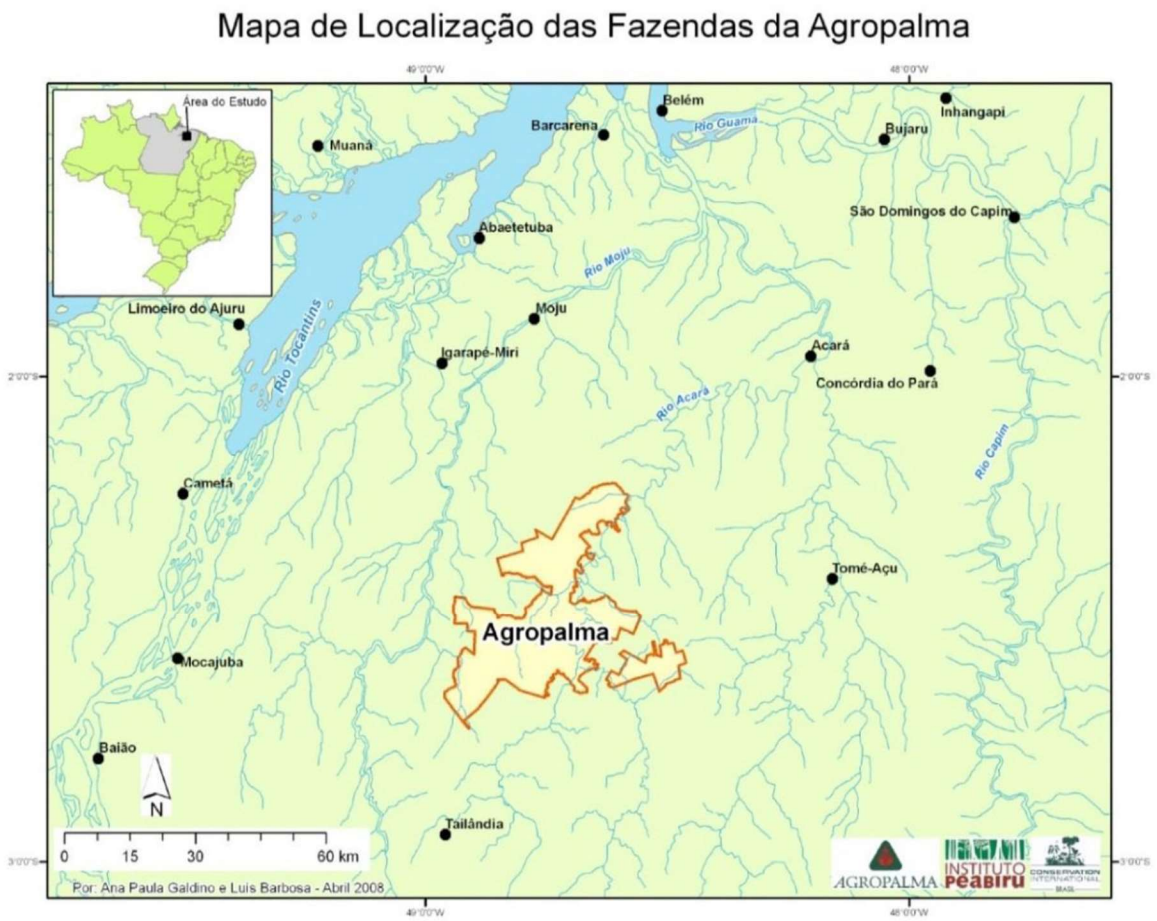
Area Leased from Altino				2002 2000 1999 1998	
Family Farmers and Integrated Outgrowers	9.224,88	9.224,88	159.352	2013; 2012 2011 2010 2009 2008 2007 2006 2005 2004 2003 2002 2001 2000 1999 1998 1986	25

1.8 HCV & HCS Areas

Plantation	HCV Area		HCS Forest[1]	Total Conservation
Name	HCV category	Area	Area	Area
Departamento I	1 and 4	5.500	5.500	5.500
Departamento II	1 and 4	8.398	8.398	8.398
Departamento III	1 and 4	4.711	4.711	4.711
Departamento IV	1 and 4	5.958	5.958	5.958
Departamento V	1 and 4	11.695	11.695	11.695
Departamento VI	1 and 4	11.593	11.593	11.593
Departamento VII	1 and 4	6.791	6.791	6.791
Departamento VIII	1 and 4	8.578	8.578	8.578
Area Leased From Altino	None	0	0	0
Family Farmers and Integrated Outgrowers	1, 3, 4, 5 and 6	9537,70	9.537,70	9.537,70

[1] Not Applicable if prior to 2014

1.9 Neighbouring Communities Map[2]



1.10 Land Tenure System[3]

The Agropalma Group acquires only legalized land, with title, deed and proven legal domain and pays the market value, and the owner sells the land if he wants. The persons entitled to receive are the legal owners of the land. Any pending or objection excludes the possibility of acquisition.

Land and outcome negotiation agreements are recorded in the public deeds of land purchase and sale, which can be accessed by anyone interested.

Visits are made, area measurements, environmental and social studies, acceptance of neighbors. The property is accepted, meeting with owners occurs. You never pay values above the market. Upon agreement, it follows to the notary's office.

[2] The map would show communities bordering, and/or directly affected by, the plantation operations
[3] Brief explanation of land use and ownership rights of the plantations

Acquisition of unregistered land ("possession") may be by way of exception only if land is considered strategic (eg, enclaves, land that favors security, land that favors logistics, etc.).

2. VERIFICATION PROCESS

2.1 Certification Body

Name	Accreditation Body	Accreditation Code	Expiration Date
IBD Certificações Ltda.	ASI (RSPO)	ASI-ACC-068 (RSPO)	2024
Description: The accreditation obtained by IBD is for realize audit against P&C and SCC RSPO Standards			

2.2 Verification Team

Name & Position	Qualification
Ricardo A. Zerlin – Lead Auditor (RZ)	Degree in Biological Sciences and Master in Ecology. Currently working in the sustainability area. Lead auditor of ISO9001 and Organic Certification protocols - Organic Brazil - Law 10,831, Demeter, NOP-USDA, Organic IBD (European Regulation CE834/07 and EC 889/2008 equivalence); Social and Environmental Certification Protocols - Rainforest Alliance, UTZ, RSPO SCC, P&C, ISCC GHG and 4C.
Andrey Dunkel Bonalume(AB)	Agronomist (São Paulo State University Júlio de Mesquita Filho-Faculty of Agronomic Sciences, 2018). Auditor since 2018 working in the Organic Certification Schemes (BR, European Regulation (CE/IFOAM), USDA NOP Standard, KRAV), Sustainable Extractivism, Biodynamic Protocol/Demeter, N-OGM IBD Certification, Certification in the Input Approval Program, Cosmetics Certification (IN, NATRUE, ORGANIC)/ Lead Auditor: ISO9001; Lead Auditor RFA AS and GR, Support CC; Lead Auditor UTZ COC, CHOC Support; Support Auditor RSPO P&C and SCC; RTRS Lead Auditor

2.3 Verification Schedule

Date	Time	Location	Activity	Auditors
06/09/21	09:00 am	Agropalma Central Office – Tailândia/PA	Opening Opening meeting of P&C Audit - Team Presentation, ISO requirements for conducting the audit, audit plan, signing declaration of conflict of interest and answering questions	RZ; AB

06/09/21	09:30 am	Agropalma Central Office and Visit pesticide storage area / PPE wash area / pesticide packaging disposal area – Tailândia/PA	Meeting with Wander Antunes / Cristiane Paiva / Tulio Dias / Helene Menu / Leandro Quaresma/ Lucio Alves/ Luiz Felipe Bigarelli/ Marcus Bragato evaluate SCC Standard/ Principles 1, 2, 4, 5 and 6	RZ; AB
07/09/21	09:00 am to 17:30 pm	Agropalma Field visit	Visits to 4 producers + Factory visit + visit to chemical storage structures and empty packaging + interviews	RZ; AB
08/09/21	09:00 am to 17:30 pm	Agropalma Field visit	Visits to 3 producers + Visits to surrounding communities	RZ; AB
09/09/21	09:00 am to 17:30 pm	Agropalma Field visit	Visits to 5 Family Farmers + Visit surrounding communities	RZ; AB
10/09/21	09:00 am to 17:30 pm	Agropalma Field visit	Visits to 10 Family Farmers	RZ; AB
11/09/21	09:00 am to 5:30 pm	Agropalma Field visit	Visit to application areas + interviews + visit to surrounding communities	RZ; AB
11/09/21	05:30 pm	Agropalma Central Office – Tailândia/PA	Closing Meeting of the day between company and auditors	RZ; AB

2.4 Stakeholder Consultation Overview

During the audit planning was verified the official list of stakeholders updated by Agropalma and considering its features the most relevant external stakeholders to be interviewed were chosen. In total, were indicated 76 stakeholders, among them representatives of local communities and associations, unions, representatives of family farmers, integrated out growers and NGOs and government agencies.

The auditor traveled to meet the stakeholders in their work places and homes. Interviews were made without Agropalma S.A. personnel to guarantee free expression to answer the questions presented respecting the confidentiality in case of filing a complaint.

During interviews it was evidenced the good relationship between AGROPALMA and the consulted stakeholders.

2.5 Stakeholders Consulted *(Stakeholder identities are confidential)*

Stakeholder Type[4]	# of Women	# of Men	Nationality	Role in community or job performed	Demographic
Workers	15	25	Brazil	Agropalma Worker	Tailândia,Acará, Tomé-Açú – PA

[4] Some stakeholder types may not be applicable

Indigenous People	0	0	-	-	-
Community members	3	4	Brazil	Representative of tomé açú, tailandia community, Resident of Vila Agropalma;	Tailândia,Acará, Tomé-Açú – PA
Contractors	2	6	Brazil	Logistic; Driver; Food Service; Industrial Maintenance; Mechanical;	Tailândia – PA
Management and supervisor staff	10	15	Brazil	Management, supervisor of Agropalma	Tailândia – PA
National government	0	0	-	-	-
Local government	0	0	-	-	-
Non-Governmental Organisations	0	0	-	-	-
Other	9	6	Brazil	Rural Association related with Group Projeto I; Projeto IV; Projeto V;	Tailândia – PA

2.6 Selection of Sites *(Sampling methodology)*

Considering the demand of estates needed to be sampled, was visited:
- Department I; IV and V (totalizing 15 lots),
- 15 smallholders;

- 7 integrated farmers;

The methodology adopted for choosing these areas considered that the same projects were not chosen in the previous year, so that some can be audited at least once, logistics was also considered. In 100% of the visits, it was possible to have the person responsible for attending the auditors;

2.7 Conformance Classification System

The findings from the evaluation are classified as follows:

- **Conformance:** when the evidence in the finding demonstrates that all the indicator requirements are fulfilled.
- **Partial Conformance:** when the evidence in the finding demonstrates partial compliance with the indicator requirements
- **Non-Conformance:** when the evidence in the finding indicates that compliance with the indicator has not been demonstrated
- **Not Applicable:** Some of the indicators can also be not applicable when the condition of the verified company during the verification does not meet the applicability of the indicator

When non-conformance or partial conformance with critical POIG indicators occurs, the company cannot be considered POIG verified until the non-conformance(s) have been corrected.

VERIFICATION CHECKLIST

****NOTE: The major Indicators for each section are highlighted in red**

POIG Indicators	Verification Finding	Conformance
1. Environmental Responsibility		
1.1 High Carbon Stock and High Conservation Values The link between oil palm expansion and deforestation will be broken through undertaking a High Carbon Stock (HCS) approach in addition to a High Conservation Value (HCV) assessment, and a process of obtaining Free, Prior and Informed Consent to use land. The approach combines biodiversity and carbon conservation, as well as social considerations (including community needs).		
1.1.1 Prior to establishing new plantations or expanding existing ones,[5] in addition to or integrated with a HCV assessment,[6] a HCS approach[7] which combines biodiversity, carbon conservation and social considerations (including community needs) has been conducted.	There were no new plantings.	**Not applicable**
1.1.2 HCS forest areas are identified and mapped.	No differences from last year were observed:	**Conformance**

[5] Does not apply to infill areas less than 2 hectares, provided this is not encroaching on protected lands (e.g. riparian zones, HCV, etc.). Where the previous HCS assessments are older than 3 years, a new assessment would need to be conducted.
[6] This must be carried out by a licensed assessor under the HCVRN scheme.
[7] Currently the HCS Approach and definitions are the only practical approach available. An HCS assessment is not required for areas entirely composed of non-native vegetation.

	The forests of Agropalma, smallholders and integrated farmers are identified and mapped, as was showed at Agropalma´s maps and for integrated farmers that will make new planting; Before any implementation of new plantations, the company carries out socio-environmental impact studies that include the assessment of carbon stocks. The new plantations will only be implemented in already open areas occupied predominantly by pastures. Evidence: Cergio Eikawa Property Map Areas set aside for new plantings 143.64 ha. It identifies what is an area of capoeira, pasture and exposed soil. Location: Tome Açú. Evidenced: Executive Social and Environmental Impact Assessment Report (AISA), Integrated Assessment of High Conservation Values and High Carbon Stocks (HCV-HCS) Land Use Change (MUT), Greenhouse Gas Emissions (GHG), and management plans for new development areas for integrated producers and family producers. Beginning in June 2019. This study is developed by Orbis Exceller Soluções Ambientais - CNPJ: 08.487.884/0001-62.	
1.1.3 After March 2014 no new plantings take place in HCS forest areas identified for conservation.	The area preparation for new plantations does not cause deforestation in primary forests HCVs or HCSs after the dates established in the indicator. Studies of new plantations that include the LUCA analysis are carried out before the preparation of the area. Evidence: Cergio Eikawa Property Map	**Conformance**

<table>
<tr>
<td></td>
<td>Areas set aside for new plantings 143.64 ha. It identifies what is an area of capoeira, pasture and exposed soil.

Location: Tome Açú.

The agricultural assistant sends the demarcated areas and a spreadsheet with each point and the coordinates, with the points demarcated in the GPS going to the field, and this is the way to guarantee the new planting in the released area.

AGROPALMA OrbisExceller

Tabela 3.1 – Períodos e atividades do projeto
<table>
<tr><th>Etapa de Avalição</th><th>Estudo</th><th>Período</th><th>Atividade</th></tr>
<tr><td>Etapa 1 pré-avaliação</td><td>EISA, HCV-HCS, MUT e GEE</td><td>Julho de 2018</td><td>Início do contrato com a Agropalma</td></tr>
<tr><td>Etapa 1 pré-avaliação</td><td>EISA, HCV-HCS, MUT e GEE</td><td>Julho/Agosto de 2018</td><td>Reunião de informações secundárias, incluindo relatórios técnico-científicos, mapas, imagens de satélite e bases de dados geográficos.</td></tr>
<tr><td>Etapa 2 trabalhos de campo</td><td>EISA, HCV-HCS, MUT</td><td>Setembro - Novembro de 2018</td><td>Estudo de Escopo
Consulta com comunidades trabalhadores, colaboradores.
Levantamentos de biodiversidade.
Levantamento de Uso e Cobertura da terra.</td></tr>
<tr><td>Etapa 3 Trabalhos de Campo, Entrevistas e levantamentos secundários</td><td>EISA, HCV-HCS, MUT</td><td>Dezembro de 2018 – Março 2019.</td><td>Mapeamento Participativo
Levantamento da biodiversidade das espécies RTE de plantas, aves e mamíferos.
Consulta com ONGs e Intitutos de Pesquisa
Inventário HCS</td></tr>
<tr><td>Etapa 4 Consultas finais</td><td>EISA, HCV-HCS</td><td>Abril de 2019</td><td>Realização do processo de ICLUP e verificação de ameaças.</td></tr>
<tr><td>Etapa 5 Avaliação de GEE</td><td>MUT, GEE</td><td>Abril de 2019</td><td>Análise da Mudança de Uso da Terra e Balanço de Emissões de Gases do Efeito Estufa</td></tr>
<tr><td>Etapa 6 Planos e Programas de Gestão</td><td>EISA, HCV-HCS, MUT</td><td>Abril/Maio de 2019</td><td>Elaboração dos Planos e Programas de Gestão</td></tr>
<tr><td>Etapa 7 Mapas e Relatórios Finais</td><td>EISA, HCV-HCS, MUT e GEE</td><td>Abril/Maio de 2019</td><td>Elaboração dos Mapas e Relatórios Finais</td></tr>
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<tr>
<td>1.1.4 Community participatory mapping has identified and mapped garden and future farmlands[8] that are fundamental to</td>
<td>Agropalma´ s and farmers´ s areas are private. There is no use of community areas for palm plantations;</td>
<td>Not Applicable</td>
</tr>
</table>

[8] Applies to lands where communities have legal, customary or user rights to the land.

meeting their basic food needs over the license period of the plantation, and excluded them from being considered HCS forest.		
1.1.5 HCS forest areas are actively conserved as part of a community participatory land use plan including FPIC,[9] and an integrated conservation and land use plan (that includes HCV areas, riparian zones, and peatland areas).	Agropalma´ s and farmers´ s areas are private. There is no use of community areas for palm plantations;	Not Applicable
1.1.6 A summary report of the HCS assessment including maps is made public.	No planting was carried out in areas characterized as HCS, nor did they contain native species;	Not Applicable
Recommendations:		
1.2 Peatland • No peat clearance: All areas of undeveloped peatlands (peat of any depth) are protected and all drainage, fires or road building on peat soils is prohibited. • Maintenance of peatlands: Water tables are managed in existing plantations on peat in order to minimise both the subsidence of the peat and the release of GHG emissions. Strategies are employed to progressively restore critical peatland ecosystems, with a preference for replanting on mineral soils, including via 'land swaps'.		
1.2.1 Undeveloped areas of peatland (of any depth) are not developed or drained.	Has no peat soil;	Not Applicable
1.2.2 Fires and road-building on peat soils are prohibited.	Has no peat soil;	Not Applicable
1.2.3 Where there is existing planting on	Has no peat soil;	Not Applicable

[9] Applies to lands where communities have legal, customary or user rights to the land.

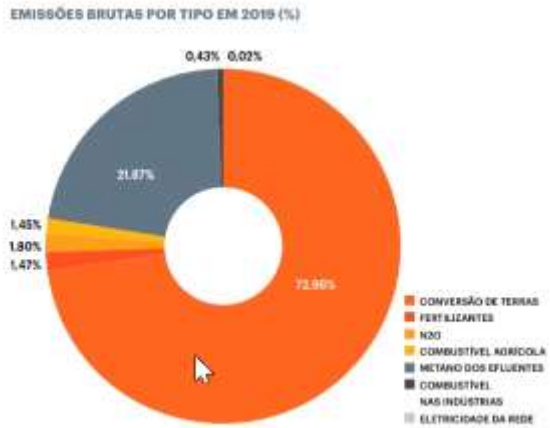
peat, critical peatland ecosystems are identified and assessed for restoration opportunities.		
1.2.4 Based on the results of the assessment above (1.2.3), peatland restoration strategies that are time-bound and expert reviewed are developed and implemented, including those to replant on mineral soils using 'land swaps'.	Has no peat soil;	Not Applicable
1.2.5 For existing plantings on peat, records show that the water table is maintained (at an average of 50cm (between 40 - 60 cm) below ground surface measured with groundwater piezometer readings, or an average of 60 cm (between 50 - 70 cm) below ground surface as measured in water collection drains) through a network of appropriate water control structures e.g. weirs, sandbags, etc. in fields, and water gates at the discharge points of main drains (RSPO Criteria 4.4 and 7.4).	Has no peat soil;	Not Applicable
1.2.6 Where drainability assessments have identified areas unsuitable for oil palm replanting, including the likely GHG emissions associated with continued cultivation, plans should be in place for appropriate rehabilitation or alternative use of such areas. If the assessment indicates high risk of GHG emissions, fires, flooding and/or saltwater intrusion, growers cease replanting and implement rehabilitation.	Has no peat soil;	Not Applicable

1.2.7 A report will be made public that includes assessments and maps of all peatlands (of any depth) within the company land bank, critical peatland ecosystems, planted peatlands, and degraded or planted areas identified for peatland restoration.	Has no peat soil;	Not Applicable
Recommendations:		
1.3 Greenhouse gas (GHG) accountability Companies shall publicly report on annual GHG emissions from all sources and on the progress towards reaching targeted reductions of non-land use GHG emissions (per ton of CPO).		
1.3.1 All sources of GHG emissions, including those related to land use and non-land use activities, are identified and monitored using the RSPO PalmGHG methodology or equivalent.[10]	As previously reported, pollutants and greenhouse gases are individually monitored at each extraction plant and these are monitored using the PalmGHG calculator and which are later included in the company's Sustainability Report. As a plan to reduce/minimize the impacts generated, the company presents in the link below, available for open consultation, its strategy for reducing greenhouse gases, and the installation of the new set of lagoons for anaerobic treatment of generated waste has already been completed. at the plant, with a deadline of 2025 the installation to capture and burn the methane gas generated. http://www.agropalma.com.br/seguro-socioambiental/politica/gestao-de-gases-de-efeito-estufa The company monitors GHG emissions through the Palm GHG tool and discloses the data in its sustainability report.	**Conformance**

[10] The latest version of the RSPO PalmGHG methodology must be used.

	The plan to reduce or minimize emissions is available on the Agropalma website. In 2020, the CPO extraction rate increased to 19%. In 2021, 95% increase in the certified organic area (compared to other years). New effluent treatment lakes in the CRAI/Agropar and Amapalma industries. Methane capture or elimination installation system installed in two extractive industries.	
1.3.2 Targeted reductions of non-land use related GHG emissions (per tonne of CPO) and/or targeted adoption of technologies or techniques which reduce global emissions of CO2eq are defined and documented.	The use of diesel as fossil energy and biomass (fiber) as renewable energy is evident. Two generator tubes are used, through which the steam generated in oil production passes, this steam is transformed into energy, maintaining the plants' self-sufficiency. The palm process is self-sufficient, it is not necessary to use electricity for industries The Agropalma and Parapalma boilers mainly use biomass (fiber) from their own palm culture after oil extraction; a flowchart (mass balance) is highlighted. They have a Strategic Plan that describes fiber packaging to increase storage capacity and increase biomass consumption. Diesel is used in extractors, specifically in boilers to start the process or in certain needs (generator sets), it is also used in vehicles and planting machines. A plan for maximum elimination of fossil fuels is highlighted: * Preventive and corrective maintenance plans. Some measures were adopted: Structuring Plan / Agropalma extraction equipment / Crop analysis 2021. / SWOT analysis of palm oil extraction.	**Conformance**

	* Optimizing the use of vehicles to reduce polluting emissions, Sifrota demonstrates the maintenance of equipment. Accredited documents are highlighted that refer to the strategic plan: * Strategic production planning (statement of actions). * Industrial production action plans (updated on 07/20/2020) and e-mail notification of the start of the execution of these actions with their expiration dates (sent to all subsidiaries, which responded with their respective plans), sent from Ricardo Martins, on 08/01/2020. During the effluent treatment interview with ALBERTO MARCAPUNA he mentions that anaerobic digestion is designed and in the future this material will be used for energy generation. Training on employee awareness of the Strategic Plan is verified. Using the PalmGHG tool, the Consumption of Fossil Fuels is monitored every other year by the Industrial and Agricultural areas. Evidenced the Technical Production Bulletin of the units. Verified listing of vehicles by Operating Class removed from the computerized system, which includes all owned vehicles according to purpose (operation). Liter/hour consumption evidenced. The program also shows costs, consumption, preventive maintenance plans, among others. Maintenance Operation Manual - revision 2015 verified - with specifications, process diagram, monitored parameters, capacities of settling pools, and other specifications considered for Agropalma/Parapalma.	

1.3.3 Annual GHG emissions from all sources and progress towards the targets documented in 1.3.2 are publicly reported.	The Agropalma Group discloses the balance of GHG emissions and sequestration on the company's website through its biannual Sustainability Report. Sustainability Reports 2013, 2015, 2017 and 2019. https://www.agropalma.com.br/arquivos/relatorios/REL_SUST_AGROPALMA_2019_PORTUGUES_FINAL_09FEV21-1613152603.pdf 	**Conformance**
Recommendations:		

1.4 Pesticide use minimisation

Highly toxic, bio-accumulative and persistent pesticides shall not be used. These include chemicals on the FSC 'Highly Hazardous' list and SAN prohibited pesticide list. Producers shall preference practice natural weed and pest control and IPM, and strive to avoid the use of toxic pesticides, only using them as an absolute last resort. There shall be full transparency of any pesticide use.

1.4.1 Highly toxic, bio-accumulative and persistent pesticides (PBT) are prohibited. This includes chemicals listed by the following: a) World Health Organization Class 1A or 1B, Stockholm or Rotterdam Conventions, b) FSC 'Highly Hazardous' list, c) SAN prohibited pesticide list and d) Paraquat.	NPE-GFIT-003 Revision 03 of 08/31/2020. Procedure that presents the integrated management plan for pests and diseases. Also presented the operational routine specifying all pests found in the region. RO-GFIT-014 - Phytosanitary Visit, revision 15. Evidenced survey of Opsiphanes pest, in plot AB13 on 07/01/2021, where 21.29 caterpillars per leaves were found in 35 ha. The MIPD points out that applications must be carried out when the infestation level is greater than 5. There is no use of prohibited pesticides. The only agrochemical used is glyphosate as a herbicide;	**Conformance**
1.4.2 The grower preferences natural weed and pest control and IPM.	Agropalma has more than 10 % with organic production compared to own production. If you count on partner producers, the value is 7% Currently, the use of pesticides for pest and disease control is based on biological products and pheromone traps. Herbicide applications and spraying of biological insecticides are performed mechanically, there is no aerial spraying. Weed management is alternated between herbicide application in the line between planting and brushing and manual crowning plants. When done, herbicide preparation occurs in the field using the signaling and equipment necessary to avoid accidental spillage. Herbicide applications are not carried out in areas near watercourses. Was observed that the company are implementing alternatives of glyphosate consumption and considering use of mechanical practices od the herbs. Evidenced the Specific Procedure Standard - NPE-GFIT-003 Revisão 03 de 31/08/2020 referring to the Integrated Pest and Disease Management Plan. Defines the responsible, classifies damage	**Conformance**

	agents, establishes damage levels, and methods of control and field monitoring. It has a table identifying the main diseases and pests, category of damage, frequency of monitoring, level of damage, type of control and definition. Currently, the only type of pest control is the dispersion of shelters contaminated by entomopathogenic fungi (B. Sophorae) and endemic virus dispersion found in dead worms (O. inviare, Talima sp, Acharia s, and use of Bacillus thuringiensis). The other controls are mechanical and behavioral. 	
1.4.3 Emergency use of listed pesticides is permitted subject to POIG Organising Committee approval.	According with MIP procedures, registers of pesticide use and during interviews was observed that no use of any pesticides listed by POIG was done;	**Conformance**

All pesticides used are described in RO-GIAG-002 - Defoliator Control, Revision 15-08/31/2020. Item 6.1.3

I.A *	Produto	I.A g/l	Faixa	DL50 oral em ratos	DL50 dérmic em ratos
Glifosato Potássico	TOUCHDOWN Xeque mate Crucial Roundup	620	Pouco Tóxico	> 2000 mg/kg	> 2000 mg/kg
Glifosato + S- Metolacloro	Sequence	265,7 353,8	Extremamente Tóxico	> 5000 mg/kg de peso corpóreo	> 5050 mg/kg de peso corpóreo
Metsulfurom Metílico	Accurate Ally Nufuron	600	Medianamente Tóxico	> 2000 mg/kg	> 4000 mg/kg
Clethodim + Haloxifop-P-Metílico	Agile	240 123,6	Medianamente Tóxico	> 2000 mg/kg de peso corpóreo.	> 2000 mg/kg de peso corpóreo.
DIUROM	Diuron	500	Medianamente Tóxico	> 300 e < 2000 mg/kg	> 12000 mg/kg

Recommendations:

1.5 Chemical fertiliser

To reduce climate and environmental impacts producers shall strive to minimise chemical fertiliser use, and preferentially use 'precision agriculture', organic fertilisers, and where possible use waste as a source of phosphorus. Phosphorus and nitrogen levels in water courses are monitored and disclosed.

1.5.1 Use of chemical fertilisers is minimised through producers demonstrating preferential use of alternatives[11] to manage soil fertility.	As a management strategy, the use of biomass generated in the industry as fertilizers, as well as the use of green fertilization and phosphorus sources of low solubility. Verified the adoption of an additional strategy using input for immobilization of aluminum to increase root depth and improve soil nutrient utilization;	**Conformance**

[11] Alternative methods include: 'precision agriculture', the use of organic fertilisers and the use of organic residues as a source of nutrients, including those resulting from the processing of oil palm bunches.

	Last analysis 07/17/2020 carried out by the company Magma Analises. Nine analyzes were found. Test report No. 2688.2020.A-V.O evidenced, collection point: Point 2 - Igarapé Montante - Industria Amapalma **ADUBAÇÃO ORGÂNICA** ▪ Atividade que visa a aplicação de cacho de fruto vazio (CFV) no interior das parcelas de plantios como fonte de suprimento de nutrientes para as plantas; ▪ Para essa atividade são necessárias carretas que transportam o CFV e pá carregadeiras para aplicação nas parcelas. 	

Composição Nutricional do CFV

Nutriente	g/kg
N	9,9
P	0,96
K	20,89
Ca	3,44
Mg	1,30
S	1,13
B	8,2
Cu	12,8
Fe	733,6
Mn	31,2
Zn	25,2
Na	131,6
Al	383,1
Co	< 0,3
Mo	< 0,3
Cl	7,17

FERTIRRIGAÇÃO

- Atividade que visa a aplicação do efluente gerado no p de extração de óleo dos cachos pelas indústrias;
- Importante fonte de nutrientes (K e Cl) para as plantas
- Para essa atividade são necessárias utilização de motob tubulações, tratores e carretéis.

1.5.2 Phosphorus and nitrogen levels in relevant watercourses are monitored and	Agropalma has a Water Resources Management Plan 'NPG 033, revision 02, 15/04/2021. Establish a procedure to guide all	**Conformance**

when the results of monitoring indicate an increased level of such elements in water due to fertiliser application, company will adjust fertiliser rates and procedures.	Agropalma Group employees on the rational use of water resources, presentation of the management plan and management criteria for water sources, focusing on the Organization's Integrated Management Policy and applicable legal requirements. It was possible to demonstrate, with the support of Leandro and Lucio/ ENVIRONMENT, the documentation corresponding to the Extractor (loss of oil in effluents and BOD/DQO), as well as the planting plans (protection of water courses).Agropalma has license No. 4439/2020 for effluent emissions, maturing on 06/23/2025, issued by the State Secretariat for the Environment and Sustainability. The fluent treatment system at the CPA, CRAI, AGROPAR, AMAPALMA has containment reservoirs and, by means of towing follows the course; through a pump, the effluent is evacuated to its own oil palm plantation, not being discharged into watercourses. Control is monthly and is under the responsibility of the Department of Environment, it is noteworthy that there are no legal parameters established for the download, therefore, no adverse impact can be detected for other users. A map of phosphorus and nitrogen analysis points was verified in streams (a kind of stream) and rivers (total of 8 collection points) carried out on 07/17/2020, period in which fertilization takes place. There is no discharge of effluent from the plants into the rivers and the use of fertilizers is made with a focus on optimizing use (soil conditioners were used to improve soil conditions and allow the plant to absorb these nutrients. Made by the company Magma Analyses. Evidenced:	

	Test report 2622.2021.A-V.O Collection Point: "Extension of the CPA - Area of Influence in the Taipei Igarapé (RSPO) KM 8 of PA 150"; Sample Matrix and Origin: Water - Supercicial Water (fresh water) Carried out on 06/17/2021 Results: Total Nitrogen: analytical result of 1.96 mg/L; Conama 357/05 Art 15 - N.A.; Total Phosphorus: Analytical Result <0.0010 mg/L, CONAMA Parameter 357/05 Art 15 up to 0.100 mg/L	
1.5.3 Results of phosphorous and nitrogen monitoring in water courses are included in public reporting.	Agropalma has a Water Resources Management Plan 'NPG 033, revision 02, 15/04/2021. Establish a procedure to guide all Agropalma Group employees regarding the rational use of water resources, presentation of the management plan and criteria for the management of water collection sources, focusing on the Organization's Integrated Management Policy and legal requirements applicable. The results can be seen in the sustainability report that is published on the company's website every 2 years. https://www.agropalma.com.br/responsabilidade-socioambiental/relatorio-de-sustentabilidade Evidence monitoring data from 2021. Analyzes performed by the Magma Analyses Laboratory. Test Report No. 72622.2021. GRANDFATHER. Point: CPA Extension – Area of Influence in Igarapé Taipé (RSPO) 8 km from PA 150. Collection date: 06/16/2021. Nitrogen 1.96 mg/L – Total Phosphorus: <0.010 mg/L.	**Conformance**

	Test Report No. 2626.2021. GRANDFATHER. Point: CRAI Restaurant – Area of Influence in Igarapé Downstream (RSPO). Collection Date: 06/16/2021. Nitrogen 2.52 mg/L – Total Phosphorus: <0.010 mg/L. Test Report No. 2627.2021. GRANDFATHER. Point: Area of Influence Downstream of the Igarapé (RSPO). Collection Date: 06/16/2021. Nitrogen 1.96 mg/L – Total Phosphorus: <0.010 mg/L. Test Report No. 2628.2021. GRANDFATHER. Point: Industria Amapalma – Area of Influence upstream of the Igarapé (RSPO). Collection Date: 06/16/2021. Nitrogen 1.98 mg/L – Total Phosphorus: <0.010 mg/L. Test Report No. 2629,2021. GRANDFATHER. Point: Access Extension to Porto Moju – Area of Influence in Igarapé (RSPO). Collection Date: 06/16/2021. Nitrogen 1.68 mg/L – Total Phosphorus: <0.010 mg/L. Test Report No. 2623.2021. GRANDFATHER. Point: Area of Influence on the Acará River (RSPO). Collection Date: 06/16/2021. Nitrogen 2.24 mg/L – Total Phosphorus: 0.330 mg/L. Test Report No. 2624.2021. GRANDFATHER. Point: Sanitary Landfill – Area of Influence in Igarapé (RSPO). Collection Date: 06/16/2021. Nitrogen 3.91 mg/L – Total Phosphorus: 0.460 mg/L. Test Report No. 2625.2021. GRANDFATHER. Point: Controlled Landfill – Area of Influence in the Igarapé (RSPO). Collection Date: 06/16/2021. Nitrogen 3.91 mg/L – Total Phosphorus: 0.460 mg/L.	
Recommendations:		
1.6 GMOs prohibition The cultivation of GMOs in the management area is prohibited.		
1.6.1 The use of GMOs in the management area is prohibited.	There is no cultivation of GMO species; The seeds purchased are from reliable and recognized producers worldwide. Example: http://www.asd-cr.com/index.php/es/	**Conformance**

	Formulario UTS 34 **REPORTE DE EMBARQUE DE SEMILLA GERMINADA** Fecha: **11 de diciembre de 2020** Destinatario: **AGROPALMA S.A.** **BRASIL** Codigo embarque : **125** **Variedad** / **Semillas** / **Garantía** / **Total Empacado** Spring / 70 000 / 2 800 / 72 800 **Total** / **70 000** / **2 800** / **72 800** Total de cajas: **18** Garantía : **4%** **CLASIFICACION DE EMBRIONES POR LONGITUD DE RADICULA** Para facilitar el manejo de la semilla germinada y ayudarle a planificar la siembra, los embriones han sido clasificados y empacados por tamaño. Esto permite plantar primero, y con facilidad los embriones de mayor desarrollo, dejando de último los más pequeños. No debe olvidarse que la longitud reportada de la radícula corresponde al momento del empaque; durante el tiempo transcurrido los embriones han continuado creciendo ininterrumpidamente, por lo que necesariamente serán más grandes al ser recibidos. **Factura N°: 217-20** CONTROL CALIDAD SEMILLAS ASD Jefe de procesamiento de semillas Guillermo Brenes R. ASD COSTA RICA g.brenes@asd-cr.com 11 de diciembre de 2020	
Recommendations:		

1.7 Water accountability

The quality and quantity of water is maintained with responsible water management adopted including minimisation and disclosure of water use, pollution elimination, equity with other users, and consideration of catchment level impacts of irrigation.

1.7.1 Water use, consumption and pollution by plantation operations and mills are monitored.	Agropalma has a "Water Resources Management Plan - NPG 033, revision 02, issue 15/04/2021". Its objective is to establish procedures to guide all Agropalma Group employees regarding	**Conformance**

	the rational use of water resources, presentation of the management plan and criteria for the management of water collection sources, focusing on the Organization's Integrated Management Policy and applicable legal requirements. It was possible to demonstrate, with the support of Leandro and Lucio/ ENVIRONMENT, the documentation corresponding to the Extractor (loss of oil in effluents and BOD/DQO), as well as the planting plans (protection of water courses). Evidenced Grant No. 3940/2019, valid until 12/17/2029. Agropalma has license No. 4439/2020 for the emission of effluents, with expiration date on 06/23/2025, issued by the State Secretariat for the Environment and Sustainability. The fluent treatment system in CPA, CRAI, AGROPAR, AMAPALMA, has containment reservoirs and, through towage, follows the course; using a pump, the effluent is evacuated to its own palm plantation. Control is monthly and is under the responsibility of the Department of the Environment, it should be mentioned that there are no legal parameters established for the download, therefore no adverse impact can be detected for other users. All water collected by the factory is recorded annually according to the procedure for use in the boilers and extraction process. This consumption is registered in the SIGIND system for each plant. Spreadsheet "03 - Water Consumption" was presented, where the total processed CFF, CPO and PKO produced and the total water consumed in the boiler and process is recorded. For the year 2021 the current consumption of water is 1,053,615.95 m3/ton CFF for all plants, a total of 750,649.15	

	tons were processed, which gives a consumption rate of 1.40 m3 of water per ton of CFF. This survey was carried out from June 2020 to June 2021.	
1.7.2 The water management plan includes targets and measures to minimise and/or reduce water use, consumption, and pollution, including in both plantations and mills.[12]	Verified that the company use as strategy for water use management, aiming the reduction of consumption: the adequate maintenance of industrial equipment; adoption of better extraction technologies to reduce water consumption; use of water in the nursery area based on the measurements of four meteorological stations and based on soil water balance; the effluents treated in POME's are distributed by means of self-propelled hydraulic cannon in the growing areas without addition of water and based on a rolling plan in the areas; and the reuse of water from the industries for cleaning.	**Conformance**
1.7.3 Water use, consumption and pollution by plantations and mills are included in public reporting.	The company's website and the Agropalma Group's sustainability report include BOD levels and the amount of water used per ton of CFF. Extraction industries have an effluent treatment system. These effluents are used for fertigation and are not released into water bodies. The BOD levels of effluents are periodically checked and recorded in the environmental self-monitoring reports. Evidence: - presentation of a satellite image with the general location of the effluent lakes of the Agropalma Group, image is from 07/15/2019. CPA-North- Branch 6: image of the fertigation area and effluent lagoon;	**Conformance**

[12] The scope is the entire area under management. The plan distinguishes among water that is used and that is consumed (e.g. disappears in industrial processes). It includes specific reduction targets, as well as pollution abatement measures.

	AGROPALMA/PARAPALMA- Branch 7: image of the fertigation area and effluent lagoon; Company Base (Industries: CRAI/AMAPALMA/AGRUPAR) - Branch 8: image of the fertigation area and effluent lagoon. General process: sedimentation of soluble solids and removal of BOD. This industrial effluent is used in the fertigation areas. Evidence: - CRAI Lagoon Monitoring Report Collection point: Treatment pond entrance - CRAI Test report No. 4580.2020.A-V.0 Company: Magma Analises Ambientais Ltda Sample: raw effluent Date: 11/10/2020 Result BOD- 3148.50 mg/L - entry point Collection point: Outlet from the treatment pond - CRAI Test report No. 4583.2020.A-V.0 Company: Magma Analises Ambientais Ltda Sample: treated effluent Date: 11/10/2020 Result BOD- 919.4 mg/L- lagoon exit point COD and Turbidity are also sampled both at the entrance and at the exit of the lagoon.	

	All water collected by the factory is recorded annually according to the procedure for use in boilers and the extraction process. This consumption is registered in the SIGIND system for each plant. Spreadsheet "03 - Water Consumption" was presented, where the total processed CFF, CPO and PKO produced and the total water consumed in the boiler and process is recorded. For the year 2021 the current consumption of water is 1,053,615.95 m3/ton CFF for all plants, a total of 750,649.15 tons were processed, which gives a consumption rate of 1.40 m3 of water per ton of CFF. This survey was carried out from June 2020 to June 2021.	
1.7.4 A water stewardship assessment is undertaken involving relevant stakeholders to address water equity issues.[13]	In the context of the place where Agropalma carries out its activities, there is no conflict over water. The region is made up of several rivers and streams. The region's rainfall is around 2500 mm per year. Before granting the license for the use of water, the state's SEMA makes a prior analysis of the availability of water resources and then makes the decision to grant the authorization for the use of water. In the municipalities where the Agropalma Group farms are located there is a low demographic density, approximately 10 inhabitants per KM2.	**Not Applicable**
Recommendations:		
1.8 Protect and conserve wildlife		

[13] A plan to engage relevant stakeholders is available, which entails steps towards their engagement to arrive at an equitable and sustainable use of shared water resources.

Following comprehensive biodiversity surveys to identify HCV 1-3, in addition to ensuring the protection and survival of all rare, threatened or endangered species (RTE) within their concession land, concession holders also make a positive contribution to their survival in the wild in areas beyond the concession.		
1.8.1 Comprehensive biodiversity surveys to identify HCV 1-3 have been undertaken.	The company has HCV or HCV/HCS studies for all new plantations. Evidence: EISA: -Features of the region, interviews with institutions, stakeholders, associations, etc. With the stakeholders, positive impacts were identified, current new palm plantations, income generation, remuneration above regional salaries, reduction of deforestation, improvement in services and social infrastructure in the region, among others. - Names of stakeholders (Francisco de Araujo- Family producer), participatory mapping. - Result of consultation with community members - General map of the coverage of producers, planted areas and communities - May/2019. New studies are being prepared for new areas. At first, the areas shown in the figure on the side did not receive new plantings. Felipe Bigarelli and Antônio Jorge informed that by the end of July 2021, they will know exactly which areas will have new plantings.	**Conformance**

Tabela 4.3 - Áreas (ha) de Altos Valores para Conservação na escala das Propriedades de Novos Desenvolvimentos

Propriedade	Área Total de HCV	HCV 1 e HCV 3	HCV 4*
Vitor Aparecido	114,14	107,01	7,13
José Lins de Oliveira	189,37	177,66	11,71
Marta Socorro	365,05	361,5	3,55
Divino Heraldo	330,66	325,46	5,2
Cergio Eikawa	11,93	11,04	0,89
Mikio Nagai	6,76	6,76	0
Francisco de Araujo	14,46	14,46	0
Ana Maria Diniz	8,15	8,15	0
Felisberto José	6,75	6,75	0
Raimundo Almeida	7,11	7,11	0
Saulo Feliciano Lote A	21,5	21,5	0
Saulo Feliciano Lote B	15,89	15,89	0
Saulo Feliciano Lote C	29,56	26,85	2,71
Saulo Feliciano Lote D	25,39	25,37	0,02
Saulo Feliciano Lote E	33,34	33,3	0,04
Manoel Ramos	12,94	12,94	0
Benedita Almeida	79,89	77,41	2,48
Ilson Magalhães	11,55	10,89	0,66
Silvestre Borges	33,22	33,22	0
Antonio Cristo Paiva	26,14	25,99	0,15
José Valente	57,17	57,17	0
Francisco Ramos	68,32	66,97	1,35
Genivaldo Borges Área 1	52,96	52,96	0
Genivaldo Borges Área 2	0,91	0,91	0
Valdecy Pigatti	129,17	107,58	21,59
Total	**1.652,33**	**1.594,85**	**57,48**

* Área de HCV 4 que não está incluída como HCV 1 e 3.

1.8.2 Management plans for all rare, threatened or endangered species include actions for their protection, survival, and prevention of poaching, in the landscape	The Agropalma Group has a Fauna Survey and Monitoring Program in partnership with the NGO Conservation International to monitor biodiversity in the company's forests.	**Conformance**

outside the management area.[14]	On the company's website there is a register of quantities of species from the Fauna Survey and Monitoring Program that contain endangered species. Fauna Monitoring Project, February 2021 During the biodiversity monitoring campaigns carried out since 2004, 1,032 species were recorded, 672 of which were vertebrate species (mammals, birds, amphibians, reptiles, fish) and 360 species of invertebrates (aquatic insects, flies, ants, spiders and bees). Currently, the Fauna Monitoring Survey Program has registered 438 species of birds, 64 species of medium and large mammals, 49 species of reptiles, 47 species of amphibians, 74 species of fish, 153 species of aquatic insects, 36 species of bees, 32 species of spiders, 25 species of flies and 114 species of ants that inhabit the forest reserves of the Agropalma Group. Of the species recorded, twenty-seven birds and eleven mammals are on the International Union for the Conservation of Nature and Natural Resources (IUCN) endangered species lists. Forest Reserves Protection Program, January 2021. Currently, the Agropalma Group has about 64,000 ha of forest reserves. To monitor these areas, there is a specific department that has a team consisting of 1 coordinator, 1 supervisor, 2	

[14] Examples of positive actions for the survival of RTE species outside the plantation or concession boundaries include: environmental education programmes with neighbouring communities; business contracts with smallholders/others that include specific clauses requiring no poaching and other protection measures; reporting illegal activities to environmental/other appropriate agencies; hiring patrols for monitoring outside the concession boundary (if permitted by law); engagement with specialised NGOs or other organisations to work on species and habitat conservation; funding for protected areas outside of concession boundaries; engaging with and supporting adjacent landowners or concession holders in identifying and protecting habitats located outside boundaries that are used by RTE species for reproduction, migration, feeding, and shelter/roosting.

	inspectors and 25 professional forest watchers, which represents approximately 2560 ha for each watchman dedicated exclusively to forest protection activities. This index surpasses surveillance even of the Iguaçu National Park (one of the most structured in the country), the Iguaçu National Park currently has 7 inspection agents located in the Unit, with only 2 environmental analysts working directly in the protection/supervision sector. Each surveillance officer is responsible for approximately 26,466.08ha.[1] The unit also has a detachment of the Environmental Military Police within the UC, and has an effective of 03 police officers working daily.	
1.8.3 The RTE management plan takes into consideration traditional hunting by communities outside the management area and includes specific activities to contribute to the protection and survival of RTE species affected by hunting.	Forest Reserves Protection Program, January 2021. Currently, the Agropalma Group has about 64,000 ha of forest reserves. To monitor these areas, there is a specific department that has a team consisting of 1 coordinator, 1 supervisor, 2 inspectors and 25 professional forest watchers, which represents approximately 2560 ha for each watchman dedicated exclusively to forest protection activities. This index surpasses surveillance even of the Iguaçu National Park (one of the most structured in the country), the Iguaçu National Park currently has 7 inspection agents located in the Unit, with only 2 environmental analysts working directly in the protection/supervision sector. Each surveillance officer is responsible for approximately 26,466.08ha.[1] The unit also has a detachment of the Environmental Military Police within the UC, and has an effective of 03 police officers working daily. To assist in the demarcation and protection of forest areas and in raising awareness among neighboring residents about the	**Conformance**

	prohibition of entry into the Agropalma Group's forest reserves, the borders are identified with warning signs (Figure 2). Figura 2 – Placa demarcando reserva florestal do Grupo Agropalma.	
Recommendations:		

2. Partnerships with Communities

2.1 Free, Prior and Informed Consent

Comprehensive FPIC is obtained for all oil palm development including in particular: full respect for their legal and customary rights to their territories, lands and resources via local communities own representative institutions, with all the relevant information and documents made available, with resourced access to independent advice, through a documented process, through a long-term two-way process of consultation and negotiation where the communities are informed and understand that saying no to development is an option, and not constrained by local legal frameworks. Newly acquired already planted plantation areas shall redress any lack of proper FPIC when the plantations were established. Lands will not be acquired through expropriations in the national interest ('eminent domain').

2.1.1 Resourced access to independent expert advice is offered at each stage of an FPIC or conflict resolution process to affected communities.	Agropalma and partner producers' areas are private and are not used in community areas.	**Not Applicable**

2.1.2 Processes of consultation and negotiation, in accordance with internationally recognised FPIC standards, are not constrained by local legal frameworks.	Agropalma and partner producers' areas are private and are not used in community areas.	**Not Applicable**
2.1.3 When acquiring land or replanting existing plantations, measures are taken to redress any issues arising from the lack of or inadequate FPIC processes carried out when those plantations were established. In such cases, participatory surveys will be conducted to identify HCVs 4, 5 and/or 6 that existed before the plantation was established.	Agropalma and partner producers' areas are private and are not used in community areas.	**Not Applicable**
2.1.4 Plantations have not been developed on land acquired through expropriations in the national interest (eminent domain) after March 2014.	Didn´t occur land acquired through expropriations in the national interest;	**Not Applicable**
Recommendations:		
2.2 Food security As part of the Free, Prior and Informed Consent process, participatory Social Impact Assessments and participatory land use planning with indigenous and local communities, food security is maintained or strengthened in order to maintain their land use choice and future food security options. This will include not undermining local control of and diversity of food production systems. There is transparency of the land allocation process.		
2.2.1 Food security for workers, smallholders, and indigenous and local communities affected by existing plantations is assessed and included in a social management plan. The scope of the food	Planting is done in own areas and without access to community areas for cultivation;	**Not Applicable**

security assessment includes the additional impacts that oil palm production operations may have, including on land, water, labour and infrastructure as well as substitutability between income generation for food purchase and subsistence food production of workers, smallholders and affected communities.		
2.2.2 After March 2014, in new plantations or expansion of existing plantations, a minimum of 0.5 ha[15] of garden or farmland per person is identified via participatory mapping, and enclaved for meeting food security needs.	Agropalma and partner producers' areas are private and are not used in community areas.	**Not Applicable**
2.2.3 Measures designed to maintain or enhance local food security are included in participatory land use planning, including transparency in any land allocation process.	Agropalma and partner producers' areas are private and are not used in community areas.	**Not Applicable**
2.2.4 Evidence that measures identified in assessments and planning are being implemented and are effective.	Agropalma and partner producers' areas are private and are not used in community areas.	**Not Applicable**
Recommendations:		
2.3 Effective conflict resolution A balanced, accountable, mutually agreed and documented conflict resolution system is established that is accessible to smallholders, indigenous peoples, rural communities and other affected parties in order to deal with complaints, grievances and resolve conflicts to the mutual satisfaction of the parties. The system will include the option of access to independent legal and technical advice, the ability for complainants to choose individuals or groups to support them and/or act as observers, as well as the option of a third-party mediator.		

[15] The area may be outside the concession, and it may exceed the minimum of 0.5 ha per person (in a family unit of indigenous or local communities) depending on fallow periods, garden and farming systems, soil fertility etc.

2.3.1 The mutually agreed and documented system for dealing with complaints and grievances is accessible to all affected parties.	It was verified that Agropalama has a procedure to record and handle complaints received together with interested parties. Complemented by the procedures of "Stakeholders Demand" which guarantees anonymity, if requested. This procedure for receiving, handling, responding, negotiating, deadlines and solving complaints and grievances was presented to the community and signed by them. The complaints procedure is documented in "Procedure for Receiving, Handling, Replying, Negotiation and Resolution of Complaints and Complaints". This is updated every 2 years. There are several communication channels for receiving complaints: - Hello Agropalama: this channel is used for the internal team and the community (08007090706, extension 8213). This communication channel is for receiving complaints, doubts, suggestions, compliments and others; - Agropalma's website: there is a link to send your comments (complaints, doubts, suggestions, compliments): complaintcoesequeixas@Agropalma.com.br	**Conformance**
2.3.2 The system provides a clear and known procedure with an indicative time frame for each stage.	As described in item 2.3.1 of this report, there is a procedure to deal with any type of suggestion or complaint received by the company. Based on the available records, it was evidenced that the duration of the complaints handling process has a maximum completion period of 3 weeks, which may be extended in some exceptional occasions (more complex case). Evidence: > Demand No. 22 of 04/09/2021. Origin: external. Description: the employee asked if he had been selected to work at the company	**Conformance**

	because there was no return. The demand was dealt with and finalized on 04/09/2021. The deadline for dealing would be 30/04/2021. Responsible: Gisele Santana; > Demand No. 23 of 04/13/2021. Origin: internal. By telephone. Description: Employee of the industrial area complains that the rest area has been reduced and there are chairs nearby. Response: Rest area has been enlarged with other chairs nearby in order to reduce crowding, date: 04/26/2021. Deadline for responding to complainants: 05/04/2021; > DDS List carried out with all employees of the 3 shifts on 04/23/2021 to deal with Demand No. 023. Evidenced presence lists of the communication carried out.	
2.3.3 The system keeps parties to a grievance informed of its progress.	Evidenced that there is an "Institutional Communication Policy - POL-COMC-001, issued on 07/07/2020, revision 00". This Policy describes the communication channels for the various audiences, such as the process of dealing with complaints, institutional visits and press relations. There is also a description of all documents involved in the communication area. >Interaction Bulletin No. 210 for the months of November and December 2020 was evidenced, reports on events of interest in the months made available to employees at Agropalma's facilities. Reports are carried out on demand, usually monthly;	**Conformance**

	1. ANEXO 1 – FORMULÁRIO DE REGISTRO DE DEMANDA DO ALÔ AGROPALMA Formulário de registro de demanda do Alô Agropalma Nº XX/20 Origem: Nome do recebedor: Data: Nome do solicitante: Contato: Endereço do solicitante: Veículo: Assunto: Descrição do Assunto: Análise de Relevância: Prazo para Resposta: Encaminhamentos: Observações: Resposta: Responsável: Veículo de resposta: Encerramento: Responsável: Data real do Encerramento: Status da demanda:	
2.3.4 The system includes the options of a) access to independent legal and technical advice; b) support from representatives of local communities' own choosing, and c) third party mediation.	As described in item 2.3.1 of this report, there is a procedure to deal with any type of suggestion or complaint received by the company. Based on the available records, it was found that the claimant has the right to: a) access to independent legal and technical advice; b) support from representatives of local communities' own choosing; c) third party mediation.	**Conformance**
2.3.5 Evidence that where conflicts have arisen the conflict resolution mechanism is being used and outcomes are considered mutually agreed including by affected	Since the complaints and grievances procedure was established there has been no record of conflicts with communities. However,	**Not Applicable**

parties.	there are questions and interaction with stakeholders in general, as evidenced in requirement 2.3.2	
2.3.6 Evidence that outcomes and remedies resulting from use of the mechanism are compatible with internationally recognised human rights.[16]	Since the complaints and grievances procedure was established there has been no record of conflicts with communities. However, there are questions and interaction with stakeholders in general, as evidenced in requirement 2.3.2	**Not Applicable**
Recommendations:		
2.4 Social conditions A comprehensive social programme with regular monitoring is in operation to ensure palm oil production does not result in human rights violations, trigger social conflicts, or produce 'land grabbing', and addresses key social equity issues including housing, healthcare, education and empowerment of women.		
2.4.1 Social impact assessments and plans for the avoidance or mitigation of impacts address the issues of potential human rights violations, social conflicts, impacts of migrant workers on local communities, and land grabbing.	Evidenced Social and Environmental Monitoring Management Plan; Studies and reports by Elabore, Peabiru, CI and the Social and Environmental Management and Monitoring Plan The company has a Social and Environmental Management and Monitoring Plan and is updated annually. This plan was developed by the Agropalma Group with direct and indirect participation from the surrounding communities and NGOs such as Peabiru, Conservation International and Aspalma – Agropalma Workers Association. The Agropalma Group has invested heavily in social and environmental projects. The health plan, dental plan, food vouchers are investments that have proven to be quite efficient, as they act directly on improving the working conditions and quality of life of workers and their dependents. Other programs such as protection of forest reserves, periodic in-company examination, Installation of photovoltaic panels for energy generation,	**Conformance**

[16] The Universal Declaration of Human Rights, adopted by the UN General Assembly in December 1948, establishes internationally recognised human rights.

	implementation and execution of Agenda 2030 in Vila dos Palmares are strategic for the group, and have great potential for continuity. Those projects that are planned still need financial adjustments for implementation, in the case of the electric energy project generated from photovoltaic panels for the company's new houses. However, these projects are part of the group's plan to improve the well-being of employees and neighboring communities. Agropalma also declares that its socio-environmental projects are strategic, therefore, necessary for the Group's good sustainability performance.	
2.4.2 Social impact assessments and plans for the avoidance or mitigation of impacts address key equity issues, including housing, healthcare, education, and empowerment of women.	The Social and Environmental Impact Assessment Report records that the company provides decent housing, access to healthcare through the Medical Clinic, access to education for employees and their dependents through the Agropalma School. In addition, the company currently offers health insurance, cost allowance to pay for a postgraduate course through the Clemente de Farias Foundation and promotes gender equality as a 50% reduction in Young Apprentices of women and men, in addition to promote the inclusion of women in activities that were previously carried out only by men. E.g.: truck driver, tractor operator and CFF cutting Evidenced in an interview with employees and with the area manager Fábio José sousa Gonçalves, that the facilities offer the employees basic needs, such as: adequate housing, sanitary facilities, electricity, access to water sources, access to medical services. On average, 110 people are responsible for maintaining the organization and cleanliness of the environment. Maintenance team is responsible for solving any problems related to the above items. The employee can contact the sector by	**Conformance**

	telephone (91) 4009-8214 ext. 8214 and e-mail: centralos@agropalma.com.br There are currently 12 accommodation units, 145 houses, 03 villages (Vila Crai, Vila Agropalma and Vila Palmares), with capacity to accommodate 680 employees (of which 90% are occupied)	
Recommendations:		
2.5 Workers' rights Palm oil producers shall respect worker's rights including the International Labour Organization (ILO) requirements for 'decent work' and core conventions on child labour, forced or compulsory labour, freedom of association, and elimination of discrimination.		
Terms and contracts of employment		
2.5.1 Permanent, full-time employment is used for all core work performed by the company. Casual, temporary and day labour is limited to jobs that are genuinely temporary or seasonal, and account for no more than 20% of the workforce.	It was verified that the company has a "People and Management Policy - NPE-GRHU-003, revision 04, issue 06/10/2021". This document includes: Introduction, responsibilities, cargo and cargo structure, step-by-step recruitment and hiring process, protocol for external selection, selection tools to be used, formalization of cargo movements and costs, benefits, among others; demisional process, shift schedule, training developed for employees, performance evaluation, among others. Agropalma has the following types of contract: - Contract determined - renewed only once. - Experience contract - after 90 days it becomes indeterminate. - Learning contract - Internship contract (according to the internship need) Selection process is carried out by a specialized consultancy.	**Conformance**

	When it is not a confidential process, the candidate is provided step by step through each step of the steps of your process. When the candidate is already hired, he is provided by the information to compare the company for the admission and integration signature. In the integration, the staff has access to all the Company's key information (production process, business, company culture, physical conduct manual, norms and rules in a general way of the company) and, at the end, they provide an integration kit with a series of documents on norms and rules and personalized gifts). All Agropalma employees are permanently hired by the 2 parties and work full time, not exceeding 44 hours per week. These are signed in accordance with the regional Union and Collective Agreement in force.	
Remuneration		
2.5.2 A living wage assessment for all workers, whether employed directly by the company or indirectly by a private employment agency, is conducted based on a credible methodology.[17]	Evidenced that a "Welfare Salary Study" was carried out in the agribusiness of Palma in April 2018. The company conducted a study of Decent Living Wage – DLW and it was found that an employee with the lowest full-time salary is paid an amount higher than the DLW value in the region. The study found that the estimated gross welfare salary for the region is R$1,606.43 per month. In comparison with Agropalma's minimum wage, the amount is R$2,050.84 paid in palm agribusiness. This study is based on all the assistance that the employee receives. Verified that payments are paid equally to employees of the same function, regardless of gender.	**Conformance**

[17] A methodology for measuring the living wage has been established by the Global Living Wage Coalition, a group of six international, multi-stakeholder standard-setting initiatives. A report published by the International Labor Organization (ILO) also reviews methodologies to estimate a living wage.

	Evidence: >Minimum wage in Brazil. 2021: BRL 1100.00. >The payment statements (month of June/2021) of the following employees were presented (Position: Agricultural Support Auxiliary). - I M S - cod. 31457 - base salary: BRL 1103.00 - J A R - cod. 30970 - base salary: BRL 1103.00 Food costs; Housing cost; Cost of other essential needs. Wage; Life insurance; Food voucher; Transport (between home and work); Health plan; Meals (breakfast and lunch); 13th salary + 1/3 vacation ÷ 12; Length of Service Guarantee Fund (FGTS)	
2.5.3 Wages are paid to all workers regularly, on time, directly to the worker and in legal tender or cheque.	It was evidenced in the contracts, specific clauses about the salary to be received according to the job description list and specific salaries by function. All contracts, payment statements and other pertinent documentation are in Portuguese for employees to understand. Payments are made by bank transfer. Evidence: >Minimum wage in Brazil. 2021: BRL 1100.00. The payment statements (month of June/2021) of the following employees were presented (Position: Technical Building). - E S L - cod. 31481 - base salary: BRL 3280.79 - D S S - cod. 31759 - base salary: BRL 3280.79 >The payment statements (month of June/2021) of the following employees were presented (Position: Agricultural Support Auxiliary).	**Conformance**

	- I M S - cod. 31457 - base salary: BRL 1103.00 - J A R - cod. 30970 - base salary: BRL 1103.00 For employees in the position of Agricultural Support Auxiliary, production premiums are paid. >In the documentation provided for each employee, the following discounts were evidenced: FGTS, INSS, Health Insurance, etc.	
2.5.4 Wage advances, loans and deductions are legal, recorded, communicated and available to workers upon request, and do not result in debt bondage.	Verified that all salary advances, loans and deductions are legal, registered, communicated and available to workers upon request and do not result in debt bondage as per item 2.5.3 of this report.	**Conformance**
2.5.5 All workers, including casual, temporary, seasonal and migrant workers, are provided compensation and benefits consistent with applicable law, including health, pension and social security.	Evidenced that all Agropalma workers receive compensation and benefits consistent with applicable law, including health, pension and social security as described in item 2.5.3 of this report.	**Conformance**
Working hours and leave		
2.5.6 The normal work week does not exceed 48 hours, not including overtime, and workers are entitled to at least one day off in 6 consecutive days. Overtime in excess of what is permitted by law is prohibited, and workers report that all overtime is voluntary.	Based on the available documents (contracts, payment statements, time records) compliance with national labor legislation was evidenced. Evidenced that the workload does not exceed 44 hours per week, with 1 hour of rest / lunch break. The following working hours were verified: Monday to Thursday from 06:00 to 16:00; Fridays from 06:00 to 15:00 and Saturdays from 06:00 to 12:00. Evidenced that all overtime is voluntary and correctly paid. At the end of each month, the employee checks if the records are correct and the same is associated with the Manager of the responsible area. Evidence:	**Conformance**

	Compliance with working hours - Daily and electronic records > Time card document / booking of entry, rests, lunch hours, overtime and departure from work for the period from 05/01 to 05/31/2021. Employees: Abdias Oliveira da Silva - cod. 22674; José Adailton do Nascimento Nunes - cod. 20879 and Márcio da Rocha Trindade - cod. 9714.	
2.5.7 All workers are provided legally mandated public holidays and periods of leave consistent with applicable law, including paid annual, parental, compassionate and sick leave. Workers not covered under applicable laws are entitled to equivalent benefits.[18]	Based on the available documents (contracts, payment statements, time records) compliance with national labor legislation was evidenced. It was verified that employees have access to the following paid periods: legally mandatory holidays, annual vacations, maternity and paternity leave, sick leave, among others. At the end of each month, the employee checks if the records are correct and the same is associated with the Manager of the responsible area. Evidence: > Time card document/ booking of entry, rests, lunch hours, overtime and departure from work for the period from 05/01 to 05/31/2021 of the following employees: Abdias Oliveira da Silva - cod. 22674; José Adailton do Nascimento Nunes - cod. 20879 and Márcio da Rocha Trindade - cod. 9714. They had access to paid vacations, mandatory holidays and rest periods.	**Conformance**
2.5.8 Records are maintained and demonstrate that hours of work do not exceed the maximum allowed by local law, regulation or collective agreement or 48 hours (per 2.5.5 above), whichever is lower.	Based on the available documents (contracts, payment statements, time records) compliance with national labor legislation was evidenced. Evidenced that the workload does not exceed 44 hours per week, with 1 hour of rest / lunch break. The following working hours were verified: Monday to Thursday from	**Conformance**

[18] Entitlements for workers not covered under applicable law will be calculated on a pro rata basis, in proportion to the entitlement of a similar full-time worker.

	06:00 to 16:00; Fridays from 06:00 to 15:00 and Saturdays from 06:00 to 12:00. Evidenced that all overtime is voluntary and correctly paid. At the end of each month, the employee checks if the records are correct and the same is associated with the Manager of the responsible area	
Child labour		
2.5.9 A clear policy and compliance system is in place that prohibits child labour and its worst forms and sets the minimum age for employment consistent with applicable law.[19]	The company has a policy established in the employee conduct and ethics manual item 10 and the Corporate Social and Environmental Responsibility Policy. IN ACCORDANCE. Evidenced POLICY OF RESP. SOCIOENVIRONMENTAL CORPORATE - POL-GRSA-001, revision 03 of 08/14/2020. Formal measures for the protection of children, including the prohibition of child labor and remediation are in place and included in service contracts and supplier agreements. It is possible to show in 5.2.1 of the policy. This policy is also available on the Agropalma website. In interviews with stakeholders and employees, there is evidence that the policy is being implemented. Evidenced employment contract between agropalma and the NGO CI Brasil. Where we have them on child labor are covered.	**Conformance**

[19] Per ILO Convention 138 on the Minimum Age for Admission to Employment and Convention 182 on the Worst Forms of Child Labor.

	Evidenced Disciplinary conduct and ethics manual of agropalma group employees. Item 10. All contracted employees receive the manual. As with all employees, if there is any update	
2.5.10 Young workers legally permitted to work but subject to compulsory education laws only work outside school hours.	Evidenced that the Agropalma group only hires people over 18 years of age as employees. Young people, aged between 14 and 24, can be hired as "Young Apprentices", in order to meet a legal requirement as described in item 6.39 of the "Manual of Disciplinary Conduct and Ethics of Employees of the Agropalma Group, revised on 10/ 2019". Evidence: In the "Manual of Disciplinary Conduct and Ethics of Employees of the Agropalma Group, revised on 10/2019", in Item 6.39: "Allowing the work of people under the age of 18 in our facilities, with the exception of "Young Apprentices", hired to comply with law 10097/2000".	**Conformance**
2.5.11 The company maintains an up-to-date list of hazardous activities and functions in the workplace that are prohibited for young workers consistent with or exceeding national regulation, where applicable.	It was verified that the risks of each of the activities performed are called in the document "Technical Report on Environmental Working Conditions - LTCAT", which measures the risks exposed in the work environment. Based on this information in the report, the PPRA and the PCMSO are developed with which measures must be taken to avoid exposure to risk by the worker. For dangerous activities, there are no young people in these activities, they only exercise administrative functions such as planning, organizing, controlling and directing.	**Conformance**
Forced or trafficked labour		
2.5.12 No fees or costs are charged to workers, directly or indirectly, for recruitment or employment services by recruitment agencies, private employment	Evidenced through interviews with employees and analysis of documents, such as contracts among others that are mandatory in Brazil, that Agropalma uses third-party services only to recruit	**Conformance**

agencies or the employer. Where it is discovered that fees have been charged, workers are reimbursed the total amount paid.	candidates for available job vacancies. The entire process of selection, interviews and admission is carried out by Agropalma itself. Verified that no fees are charged at any stage of recruitment for candidates. It was verified that the company has a "People and Management Policy - NPE-GRHU-003, revision 04, issue 06/10/2021". This document includes: Introduction, responsibilities, the structure of positions and remuneration, step-by-step recruitment and hiring process, protocol for external selection, selection tools to be used, formalization of job movements and salaries, benefits, among others; demisional process, shift schedule, training developed for employees, performance evaluation, among others. Agropalma has the following types of contract: - Contract determined - renewed only once. - Experience contract - after 90 days it becomes indeterminate. - Learning contract - Internship contract (according to the internship need) Selection process is carried out by a specialized consultancy. When it is not a confidential process, the candidate is informed of the step by step of each of the steps of his process. When the candidate is already hired, he/she is informed of the date to go to the company to sign the admission and integration. During integration, staff have access to all key information of the Company (production process, business, company culture, physical conduct manual, norms and rules in general of the	

	company) and at the end they receive an integration kit with a series of documents on norms and rules and personalized gifts).	
2.5.13 The retention of passports, other government-issued identification and any personal valuables by the employer or third-party recruitment or employment agency is strictly prohibited in policy and monitored in practice.	Evidenced during remote audit that Agropalma does not retain personal documents from employees. This practice is prohibited under Brazilian law and Agropalma's internal policy.	**Conformance**
2.5.14 Growers and millers conduct a risk assessment of their Fresh Fruit Bunches (FFB) supply chain to identify and take steps to address risk of forced labour, human trafficking and child labour.	It was verified that Agropalma has an exclusive sector (Agriculture) dedicated to technical assistance to its fruit supplier partners (family producers and integrated producers). This sector aims to provide technical, social and environmental guidance to producers to improve production and comply with RSPO requirements. Internal audits are carried out by technicians from this sector throughout the year to verify compliance with RSPO requirements. In addition to visits, constant training is provided to producers and their employees. Through monthly visits, the team monitors compliance with social and environmental issues on the farms, including human trafficking and child labor, and establishes requirements to be met by other members of the supply chain. It was verified that all contract models, whether with employees or service providers, a specific inclusion of trafficked labor was carried out in the clause that already dealt with slave labor and child labor. Evidence: >Contract No. 11/2021 between Agropalma and Indendent Producer "V P", with an additive with clauses that producers must meet the following requirements: Comply with the principles and criteria established by the RSPO certification; Comply with the	**Conformance**

	legislation in force in the country; Do not use or benefit from child labor in any of its activities, among others.	
Recommendations:		
2.6 Support to smallholders Contracts with smallholders are based on a fair, transparent and accountable partnership. Smallholders are supported to improve economic, social and environmental outcomes including: increase productivity to a comparable benchmark of productivity for the region and a target of having the same productivity as the company nucleus plantation. The productivity gains shall be achieved without expansion that threatens local community food security or additional environmental impact, and support should include financial management and budgeting, logistics and FFB processing, and improved market access such as through group certification. Companies shall report on the support they have provided to smallholders.		
2.6.1 A smallholder support programme is developed, documented and monitored, which includes: a) Measures to increase the productivity of smallholders to a comparable benchmark of productivity for the region, and a target of reaching at least the same productivity level as company estates; b) Support relating to financial management and budgeting and c) Support relating to logistics, FFB processing and market access.	The company has a living condition improvement program. This program includes workshops, field days, campaigns, DDS and the Family Agriculture Program itself with 192 families covered. Through technical assistance reports and visit registration books (black book) carried out, all producers can present the impacts caused. During interviews with producers, they informed that they receive adequate assistance to improve their production and that they know and agree with the dynamics of the prices paid by the FFB. The company guides and supports its CFF suppliers in the search for legality and as a result all producers who supply Agropalma are certified.	**Conformance**
2.6.2 Progress in implementation of the smallholder support programme is included in public reporting.	The last published report is AGROPALMA : RELATORIO DE SUSTENTABILIDADE 2019 where is available for download at	**Conformance**

	Agropalma website. At pages 24 and 26 are the information regarding support to smallholders can be consulted. https://www.agropalma.com.br/arquivos/relatorios/REL_SUST_AGROPALMA_2019_PORTUGUES_FINAL_09FEV21-1613152603.pdf	
2.6.3 Report on percentage of schemed smallholders, percentage of independent smallholders and percentage RSPO certified of each.	Evidenced during document analysis that Agropalma has a complete list of all CFF suppliers involved for RSPO certification, both family and integrated producers. The following documents were verified: 2021 Production Report and excel spreadsheet removed from the SAPINS system. The production report contains: producer name, batch number, plant number, no. planted hectares, plants per hectare and other information. The SAPINS system provides details of signed contracts, such as: contracted, contract duration, service provided, date the contract was signed, among others.	**Conformance**
2.6.4 Develop a group certification plan for independent smallholder identified in the supply base of each mill within three years of the mill obtaining its own certificate and support the independent smallholders to achieve certification and progress towards POIG verification.	Through technical assistance reports and visit registration books (black book) carried out, all producers can present the impacts caused. During interviews with producers, they informed that they receive adequate assistance to improve their production and that they know and agree with the dynamics of the prices paid by the FFB. The company guides and supports its CFF suppliers in the search for legality and as a result all producers who supply Agropalma are certified.	**Not applicable.**
Recommendations:		
3. Corporate and Product Integrity		

3.1 Anti-corruption and transparency Producer companies shall publicise a commitment to prohibit any form of corruption including during the concession acquisition process and within their operations, and support efforts to establish and comply with anti-corruption legislation where this exists. In the absence of anti-corruption law, the producer company shall implement other anti-corruption measures proportionate to scale and intensity of management activities and the risk of corruption.		
3.1.1 An ethical policy prohibiting all forms of corruption is publicly available.	The Agropalma Group fully complies with the Brazilian Anti-Corruption Law, Law No. 12846/2013. This guideline is required from all employees of the group, as described in items 1,2,3 and 11 of the Conduct, Disciplinary and Ethics Manual for the employees of the Agropalma Group. Evidenced Manual of disciplinary and ethical conduct of Agropalma group employees, which is made available to all employees at the time of hiring, and after employees have access to this manual, which is available on the Intranet.. Every time an update or change is made to some legislation, new manuals are produced and made available to all employees. Upon receipt, all employees sign the term of commitment, where they acknowledge the knowledge of what is described in the document.. In item 11, themes such as fraud and corruption are aborted.	**Conformance**
3.1.2 The ethical policy covers: a) Bribery; b) Facilitation payments; c) Guidance and procedure for gifts and hospitality d) Disclosure of political contributions; and e) Guidelines for charitable donations and sponsorships, f) Respect for fair conduct of business; g) Proper disclosure of information in accordance with applicable regulations and accepted industry practices and h)	The Agropalma Group's Employee Conduct, Disciplinary and Ethics Manual describes that any practice of bribery, payment of facilitations and compliance with the anti-corruption law is prohibited. In item 6.23 it is described that it is prohibited to receive or give gifts worth more than US$ 30.00.	**Conformance**

Compliance with existing anti-corruption legislation.	Items: 6.23, 6.24 and 11 of the Conduct, Disciplinary and Ethics Manual of the Agropalma Group's employees	
Recommendations:		
3.2 Traceability Within 12 months of commitment to the Charter, all supply is fully traceable from company plantation and other suppliers' fields to their mills. Each party shall take responsibility for traceability in the components of the supply chain under their control and transparency with their supply chain partners.		
3.2.1. Within 12 months of commitment to the Charter all mills under the management of	It was verified that Agropalma has a management system called BioSalq, which manages the revenue of all FFB that enter the 5	**Conformance**

the grower member have a traceability system in place to identify the location (at least GPS coordinates) of FFB production.	plants. There is an Operational Routine described in the document "Weighing of Matter and Products - RO-BEFT-001, Revision 04, Issue 07/05/2020", which establishes procedures for carrying out the weighing activity of PM's and other products produced in the extraction plants . The routine describes in detail the procedure to allow the entry of FFB in the 5 factories. The centralized system that is in use to record the entry of FFB in the mills has a database where all producers authorized to deliver FFB to the mills are registered and there is detailed information on each of them, such as: number of lots, date of planting, address and certification status (RSPO). The database contains records of all oil palm lots by Agropalma SA. The FFB entry record is made on the scale where the Ticket with the weight is generated. Documents Analyzed: >Proof of Delivery of CFF - INTEGRATED / THIRD PARTY PRODUCER: Name: Karl Bernhard Reich Date: 06/29/2021 Field Inspector: Benedito de Adrião Planting Year: 2004 Box No.: 37 (14 to 18 ton) Registration/code: 3026 Driver: Daniel Silva de Oliveira Responsible for the Balance: Dany registration 27850-5821 Truck Plate: OTU-8717	

	>Weighing Ticket (printed by the system after weighing, unloading CFF and weighing the empty truck) Ticket No.: 1195821 Delivery Date: 06/29/2021 Exit Date: 06/29/2021 Destination: Agropalma (Branch 07) Release: 70336 Cash No.: 3032 Installment: Y3026 Planting Year: 2004 Gross Weight 27850 Kg Tare: 12900 kg Net Weight: 14950 Kg Truck Plate: OTU-8717 Scale Operator: Danielly Souza de Moraes >NF No. 65367 issued on 06/30/2021 by Agropalma SA regarding the delivery of 14.95000 ton of CFF by producer Karl Bernhard Reich; >Integrated Producers Shipment referring to 06/2021: 34 producers delivered 2884.69 ton; Family Farming Remittances (4 projects) referring to 06/2021: Project 1: Delivered 875.48 ton;	

	Project 2: Delivered 79.73 ton; Project 3: Delivered 130.33 ton; Project 4: Delivered 57.25 ton; Total: 1142.79 tons.	
3.2.2. Within 24 months of commitment to the Charter the mills under the management of the grower member will only source FFB from known and identified sources and not from illegal sources.	All FFB supply for Agropalma comes from its own land, comprising 8 agricultural sectors and leased land. There are 245 supplier producers, all of which are covered by the scope of the certificate. There are currently 203 family farmers, divided into 4 projects (5 communities I, II, III, IV and V) where each family/producer has from 4 ha to 13 ha and 42 integrated producers with oil palm plantation areas between 30 ha and 500 there is. Agropalma has long-term commercial contracts with everyone. Some farmers/family producers are organized in associations managed by a board, headed by a president. Agropalma only receives FFB from producers already registered in its supply base.	**Conformance**
3.2.3. Within 24 months of commitment to the Charter the company will have a time-bound plan to bring all FFB sourced into compliance with the POIG indicators and efforts to bring non-compliant smallholders into compliance are documented.	NPG55 – Politica de Engajamento de Fornecedores de CFF ao RSPO e ao POIG. Agropalma has two types of CFF suppliers, as described below: ▯ Producers with exclusivity contract: currently they are responsible for more than 95% of the CFF provided and include integrated producers and family farmers. ▯ Producers without exclusivity contract: they provide less than 5% of the CFF, they are also called of independent producers. At least twice a month, an Agropalma representative visits each supplier to carry out their technical assistance work.	**Conformance**

Currently, the Agropalma Group has 238 suppliers with exclusivity contracts and 5 producers independent. The main challenge for everyone to comply with the POIG indicators relevant to its activities are the RSPO certification of 6 suppliers, 1 integrated and 5 independent.

It is important to note that the above schedule is a theoretical forecast on which Agropalma will work to materialize. However, it is important to make clear that the processing of the RaCP depends on the RSPO and not on the Agropalma. Likewise the decision of independent producers to obtain RSPO certification Nor does it depend on Agropalma.

5.3. CRONOGRAMA DE ENGAJAMENTO E CERTIFICAÇÃO

Atividade	2017	2018	2019	2020	2021	2022	2023	2024	2025
Trabalhos de conformidade e adequação aos indicadores RSPO e POIG realizado pelos produtores									
Acompanhamento e monitoramento									
Finalização do processo de RaCP Pigatti									
Conversão de dois produtores independentes em produtores integrados									
Obtenção da certificação desses dois produtores após o processo de integração									
Realização do RaCP por três produtores integrados									
Obtenção da certificação RSPO por esses três produtores integrados									

Recommendations:

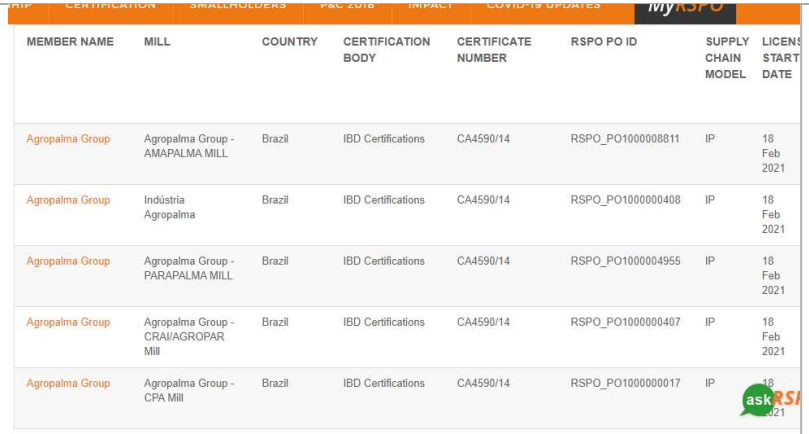
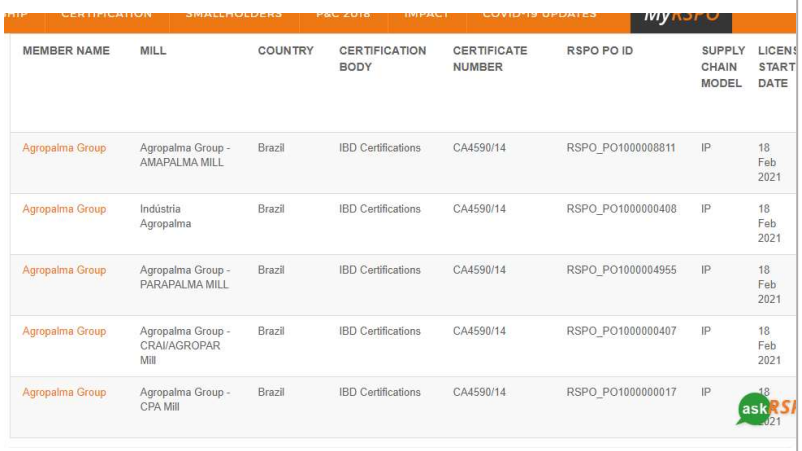
3.3 Report on social, labour and environmental performance

Disclose the company's social, labour and environmental performance including the elements of the POIG Charter, and how the organisation demonstrates good governance of its sustainability system using the guidance of the Global Reporting Initiative (GRI) or equivalent approach.

3.3.1 A publicly available sustainability report is prepared at a minimum every two years, covering as a minimum all issues relevant to compliance with this Charter. This includes relevant RSPO indicators and the additional POIG indicators.	The Agropalma Group publishes a biannual Sustainability Report. They are available for consultation on the Agropalma website.	**Conformance**

	https://www.agropalma.com.br/arquivos/relatorios/REL_SUST_AGROPALMA_2019_PORTUGUES_FINAL_09FEV21-1613152603.pdf Pg36-39	
3.3.2 The public sustainability report includes details relating to the company's governance of its sustainability systems, consistent with the GRI Sustainability Reporting Guidelines (or equivalent approach).	Agropalma publishes sustainability reports in accordance with the guidelines of the Global Reporting Initiative - GRI. https://www.agropalma.com.br/arquivos/relatorios/REL_SUST_AGROPALMA_2019_PORTUGUES_FINAL_09FEV21-1613152603.pdf Pg36-39	**Conformance**
Recommendations:		
3.4 RSPO certification and company operations Producers shall meet a minimum of 50% of their plantations being RSPO certified upon commitment to the Charter, and a commitment to achieve 100% by within 2 years. This shall cover all palm oil operations, subsidiaries, acquisitions of existing plantation and fresh fruit bunch purchases from third parties, with possible alternatives to full RSPO certification for small independent producers.		
3.4.1 A minimum of 50% of the company's plantations and mills are RSPO certified upon commitment to this Charter[20].	100 % of Agropalma s plantations and mills are RSPO certified.	**Conformance**

[20] The POIG Secretariat will assess compliance as part of the Due Diligence entry requirements.

	 MEMBER NAME / MILL / COUNTRY / CERTIFICATION BODY / CERTIFICATE NUMBER / RSPO PO ID / SUPPLY CHAIN MODEL / LICENS START DATE Agropalma Group / Agropalma Group - AMAPALMA MILL / Brazil / IBD Certifications / CA4590/14 / RSPO_PO1000008811 / IP / 18 Feb 2021 Agropalma Group / Indústria Agropalma / Brazil / IBD Certifications / CA4590/14 / RSPO_PO1000000408 / IP / 18 Feb 2021 Agropalma Group / Agropalma Group - PARAPALMA MILL / Brazil / IBD Certifications / CA4590/14 / RSPO_PO1000004955 / IP / 18 Feb 2021 Agropalma Group / Agropalma Group - CRAI/AGROPAR Mill / Brazil / IBD Certifications / CA4590/14 / RSPO_PO1000000407 / IP / 18 Feb 2021 Agropalma Group / Agropalma Group - CPA Mill / Brazil / IBD Certifications / CA4590/14 / RSPO_PO1000000017 / IP / 18 2021	
3.4.2 Within 24 months of POIG membership, 100% RSPO certification of the company's plantations and mills is achieved.[21]	100 % of Agropalma s plantations and mills are RSPO certified.  MEMBER NAME / MILL / COUNTRY / CERTIFICATION BODY / CERTIFICATE NUMBER / RSPO PO ID / SUPPLY CHAIN MODEL / LICENS START DATE Agropalma Group / Agropalma Group - AMAPALMA MILL / Brazil / IBD Certifications / CA4590/14 / RSPO_PO1000008811 / IP / 18 Feb 2021 Agropalma Group / Indústria Agropalma / Brazil / IBD Certifications / CA4590/14 / RSPO_PO1000000408 / IP / 18 Feb 2021 Agropalma Group / Agropalma Group - PARAPALMA MILL / Brazil / IBD Certifications / CA4590/14 / RSPO_PO1000004955 / IP / 18 Feb 2021 Agropalma Group / Agropalma Group - CRAI/AGROPAR Mill / Brazil / IBD Certifications / CA4590/14 / RSPO_PO1000000407 / IP / 18 Feb 2021 Agropalma Group / Agropalma Group - CPA Mill / Brazil / IBD Certifications / CA4590/14 / RSPO_PO1000000017 / IP / 18 2021	**Conformance**
3.4.3 Newly acquired plantations are RSPO certified within 24 months of acquisition.	There are no newly acquired plantations at Agropalma.	**Not applicable**
3.4.4 A policy for purchasing 100% RSPO certified FFB within 24 months of signing the	Presented FFB Supplier Engagement Policy for RSPO and POIG (NPG-55, 07/13/17) that contains:	**Conformance**

[21] Where there are plantations waiting for a mill, the rule will only apply after mill construction has been completed.

POIG Charter is developed, implemented and monitored for progress. Acceptable alternatives may be defined for independent smallholders.	- Item 5.4 - Policy to purchase 100% of certified FFB: - Objective to acquire 100% of CFF certified RSPO; - Currently all FFB is RSPO certified; - New producers with exclusive contract have 3 years to be RSPO certified; - Independent producers must have freedom of choice in being RSPO certified;	
Recommendations:		
3.5 Responsible Supply Chains Producers shall independently verify and report on compliance with this Charter within 12 months of commitment to the Charter, across their operations, subsidiaries and acquisitions of existing plantation including FFB from 3rd party suppliers.		
3.5.1 Compliance with the requirements of the Charter, including the POIG indicators, is independently verified within 12 months after signing the commitment to this Charter.[22]	This audit is the fifth that assesses Agropalma's compliance with POIG indicators. The last audit before the current one was carried out on September 3, 2020 (12 months before the current audit);	**Conformance**
3.5.2 Following the initial assessment, compliance with the requirements of the Charter, including the POIG indicators, is independently verified on an annual basis.	Agropalma s POIG audit are made jointly with the RSPO audit that are performed on an annual basis;	**Conformance**
3.5.3 Audit reports are made publicly available on the POIG website.[23]	Last Agropalma POIG audit was published at the POIG website.	**Conformance**
Recommendations:		

[22] The POIG Secretariat will monitor compliance with this indicator.
[23] The POIG Secretariat will monitor compliance with this indicator.