



Palm Oil Innovation Group Verification Report
For
[Agropalma Group]
In
[Tailândia, Acará and Tomé-Açú/Pará, Brazil]

Certification Body: IBD Certificações Ltda.

Verification Dates: July 4 to 8th, 2022

Verification Type: Surveillance



Table of Contents

Table of Contents.....	1
Executive Summary	2
Verification Result.....	2
List of Abbreviations	3
1. SCOPE OF THE VERIFICATION	3
1.1 Normative References	3
1.2 Organisation and Contact Details.....	3
1.3 Audit Type.....	4
1.4 RSPO and other Certifications.....	4
1.5 General Description of Supply Base	4
1.6 Location	5
1.7 Supply Base Statistics.....	6
1.8 HCV & HCS Areas	7
1.9 Neighbouring Communities Map.....	8
1.10 Land Tenure System.....	8
2. VERIFICATION PROCESS	9
2.1 Certification Body	9
2.2 Verification Team.....	9
2.3 Verification Schedule	110
2.4 Stakeholder Consultation Overview.....	133
2.5 Stakeholders Consulted (<i>Stakeholder identities are confidential</i>).....	154
2.6 Selection of Sites (<i>Sampling methodology</i>).....	165
2.7 Conformance Classification System	166
3. VERIFICATION CHECKLIST	10
Appendix A – Corrective Action Plan	78
Appendix B – List of Stakeholders Contacted (Confidential).....	79

Executive Summary

The Agropalma POIG audit was conducted in combination with the RSPO audit from July 04 to 08, 2022 by an interdisciplinary audit team composed of Nicholas Nordi, Andressa Keller, Pablo Cevallos and Dina Maria Medem.

The audit was conducted at the Amapalma, Agropalma, CRAI, Agropar, Parapalma and CPA plants, located in Tailândia and Acará/PA.

As a strategy to demonstrate compliance with the RSPO and POIG standards, the audit plan allocated time for each auditor to interview managers, coordinators, Agropalma workers both in the factories and in the field, family producers, integrated producers and communities, considering the importance and hazardousness of the activities carried out.

In addition, employees of subcontracted companies that carry out transportation, maintenance, patrimonial surveillance, food service and those responsible for the health plan were interviewed.

Verification Result

No non-conformities were 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. Wander Antunes
Telephone:	+55 91 9230 6575
E-mail:	wander@agropalma.com.br
Website:	www.agropalma.com.br

1.3 Audit Type

Audit Date	July 4 to 8th, 2022
Main Evaluation or ASA (1-4)	ASA 4



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

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 Mill	Road PA 150, KM74, Direito - Tailândia, PA – Brasil	48°47'47.85°W	2°31'36.34"S
Agropar Mill	Road PA 150, KM74, Direito - Tailândia, PA – Brasil	48°47'47.85°W	2°31'36.34"S
Amapalma Mill	Road PA 150, KM74, Direito - Tailândia, PA – Brasil	48°47'49.86°W	2°31'29.59"S
Agropalma Mill	Road PA 150, KM74, Direito - Tailândia, PA – Brasil	48°42'17.65°W	2°32'34.06"S
CPA/Palmares Mill	Rodovia PA 150 Km 50, Esquerdo, Acará – PA – Brazil	48°35'11.78°W	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
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1.7 Supply Base Statistics					
Name	Plantation Area (Ha)		Annual FFB yield	Year(s) Planted	Date of Next Planting
	Total	Planted			
Departamento I	4839,60	4.561,86	65.872	2008, 2017, 2013, 2010, 1992, 1991, 1989, 1988, 1987, 1986, 1985	25
Departamento II	5.194,21	5.194,21	55.019	2013, 2012, 2010, 1999, 1994, 1993, 1992, 1991	25
Departamento III	6569,83	6569,83	135.835	1999, 1991, 1997, 1996, 1995, 1992	25
Departamento IV	4.954,01	4.954,01	94.951	2001, 2000, 1999, 1998	25
Departamento V	6.173,71	6046,03	108.897	2016, 2015, 2011, 2010, 2007, 2004, 2002, 2001	25
Departamento VI	4.053,25	3647,08	37.808	2017, 2016, 2015, 2012, 2011, 2001, 2001, 2000, 1996, 1990, 1989	25
Departamento XV	4.148,52	4.148,52	75.312	2010, 2009, 2008, 2006	25
Departamento XVI	3.089,87	3.089,87	53.771	2010, 2009, 2008, 2007	25

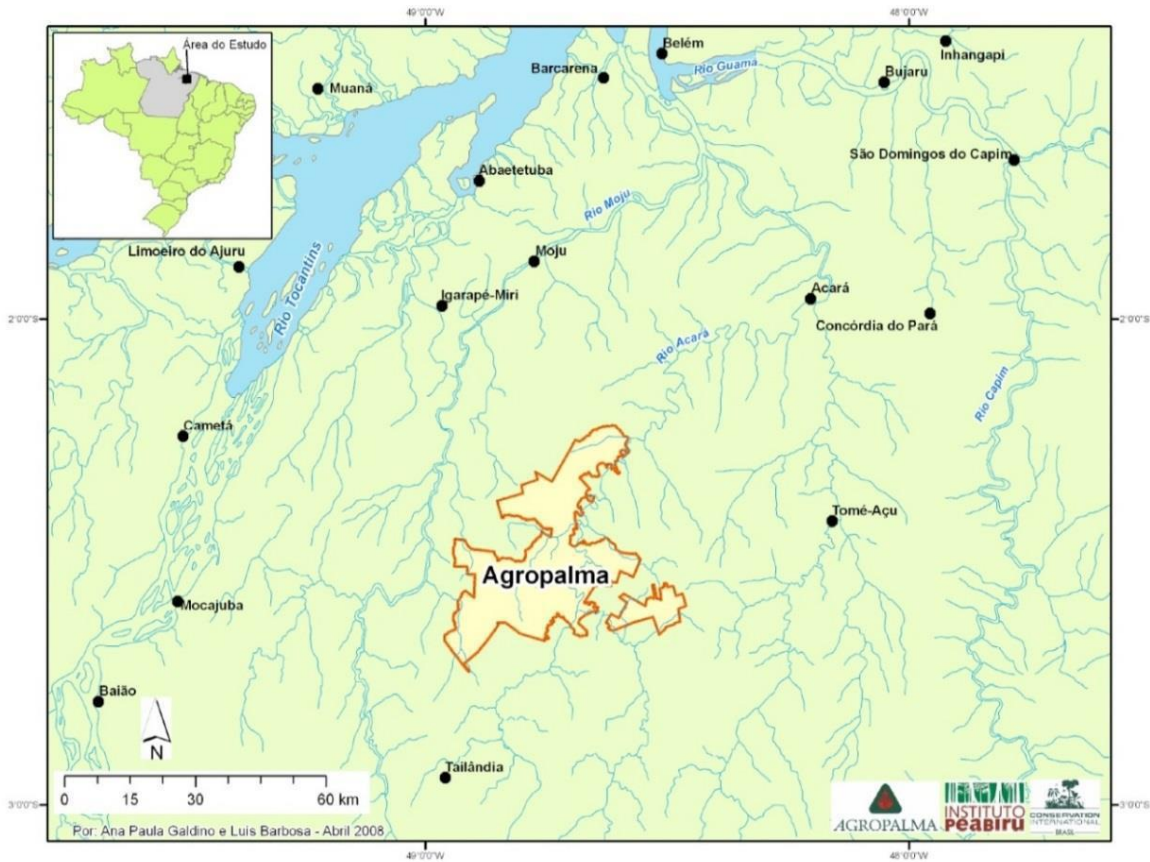
Area Leased from Altino	505,06	505,06	7.634	2010, 2009, 2005, 2004, 2003, 2002, 2000, 1999, 1998	25
Family Farmers and Integrated Outgrowers	10343,74	9537,70	140147	2010, 2009, 2005, 2004, 2003, 2002, 2000, 1999, 1998	25

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 Map²

Mapa de Localização das Fazendas da Agropalma



² The map would show communities bordering, and/or directly affected by, the plantation operations

1.10 Land Tenure System³

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.

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)	03/11/2024
Description: The accreditation obtained by IBD is for realize audit against P&C and SCC RSPO Standards			

2.2 Verification Team	
Name & Position	Qualification
Dina Maria Medem Cortés (DM)	Food Engineer Master in Food Science and Technology (Fruit Processing) - UFV-Brazil. Ph.D. in Food Science and Technology (Organic Agroindustry and New Product Development. UFV-Brazil. More than 15 years of experience in the food industry (Colombia and Brazil). Lead Auditor ISO 9001/2015 (IRCA).

³ Brief explanation of land use and ownership rights of the plantations



	<p>RSPO P&C / SCC Lead Auditor Lead Auditor ISCC Organic Certification Auditor (EU, USDA/COR CAN) SPP Auditor (Small Producers' Symbol) Peer reviewer accredited by ASI.</p>
Nicholas Nordi (NN)	<p>Agronomist Engineer Master in Horticulture Lead Auditor ISO 9001/2015 (Certificate NO. PC01E010249 - GOLBAL PCS - 2021). Lead Auditor Organic Certification (BR, CE, US) Lead Auditor RSPO SCC P&C Support Auditor Auditor ISCC EU and PLUS</p>
Andressa Keller (AK)	<p>Forestry Engineer Experience of more than 07 years in sustainable certification (Brazil). Lead Auditor ISO 9001/2015 (Certificate NO. 6019317 - GOLBAL PCS - 2019). Lead Auditor RSPO P&C / SCC Lead Auditor Rainforest Alliance RTRS Lead Auditor Lead Audit Organic Certification FSC Audit</p>
Pablo Cevallos (PC)	<p>Agricultural Engineer Quality and Environmental Management Systems Experience in Socio-environmental Management Systems, Sustainability and Social Responsibility. SEDEX / SMETA, URSA, Flor Ecuador, ICS, RESA. Associate Auditor APSCA (Association of Professional Social Compliance Auditors). Lead Auditor IRCA ISO 9001:2015 Lead Auditor IRCA ISO 14001:2014 Lead Auditor RSPO P&C</p>

2.3 Verification Schedule				
Date	Time	Location	Activity	Auditors
July 4 th , 2022	10:00 am	Agropalma Central Office Tailândia/PA	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	DM, AK, NN, PC
	10:30 – 17:30		Documentary review 2.5.1, 2.5.9, 2.5.11, 2.5.12 2.3.1, 2.3.2, 2.3.3, 2.3.4,	AK, NN
July 5 th , 2022	10:30 – 17:30	Agropalma and Parapalma mills	Tour of the Agropalma and Parapalma mills + interviews with collaborators.	DM, PC
	08:00 – 17:30		Documentary review 1.4.1, 1.4.2, 1.4.3, 1.5.1, 1.6.1,	PC
		Agropalma Central Office Tailândia/PA	Documentary review 1.1.1, 1.1.2, 1.1.3, 1.1.4, 1.3.1, 1.3.2, 1.3.3, 1.5.3, 1.7.2, 1.7.3, 1.8.1, 1.8.2, 1.8.3, 2.4.1, 2.4.2, 2.5.2, 2.6.2, 3.1.1, 3.1.2, 3.2.3, 3.3.1, 3.3.2, 3.4.1, 3.4.2, 3.4.4, 3.5.1, 3.5.2,	DM
		Field visit	Visit to the integrated producers (Morning: Vitor Aparecido Ferreira and José Lins. Afternoon: José Ribamar and Maria Rosangela)	NN
July 6 th , 2022	08:00 – 17:30	Crai, agropar and Amapalma mills	Tour of the Crai, Agropar and Amapalma mills + interviews with collaborators.	DM
	08:00 – 12:00	Headquarters of the Arauaí Producers' Association and visit to the plantations of projects 2 and 3.	Interviews with family farmers: Angela Carneiro, José Antônio Bahia, Helena Maciel, Genivaldo Borges, Elton Dias Silva, João Evangelista Dias and Vanda da Silva.	AK
		14:00 – 17:30	Agropalma Central Office Tailândia/PA	
	08:00 – 12:00		Documentary review 1.5.2, 1.7.1	

	14:00 – 17:30	Field visit	Visit to the integrated producers (Marlene da Rosa and Marta do Socorro Neves)	NN
	08:00 – 15:00	Central Agricultural Department Shelter	Visit in own areas Departments III, VI and XV	PC
	15:00 – 17:30	Ponds of the Parapalma and Agropalma Industries and the Fitossanitary Car-painting plant.	Visit to the effluent lagoons and visit to the washing area washing of PPE's	
July 7 th , 2022	08:00 – 17:30	Surrounding communities	<p>Social Theme Status: Agropalma Denounces.</p> <p>Visit to the surrounding communities:</p> <ul style="list-style-type: none"> - Manoel Silva- community leader from Vila dos Palmares - Josiel de Oliveira / Marinalva Gonçalves <p>Representative of Vila Vera Cruz - Assentamento Olho d'Água.</p> <ul style="list-style-type: none"> - Santo Antônio (Saí-açu) - Jorgeanne Barbosa dos Santos Ramos. - Palmares Health Post / Jullyana S. Pitombeira (director) - Carlos Santos / Interim President of the Rural Workers Rural Workers Union of Tailândia. <p>Visit to the cemeteries, an area that is part of the social theme that involves Agropalma.</p>	PC
		Agropalma Central Office Tailândia/PA	<p>Documentary review</p> <p>2.5.3, 2.5.4, 2.5.5, 2.5.6, 2.5.7, 2.5.8, 2.5.10, 2.5.13, 1.7.2 and 1.3.2</p>	AK

			Documentary review 2.5.14, 2.6.1, 2.6.3, 3.2.1, 3.2.2	NN
			Interviews with collaborators and subcontractors and documentary review: 2.5.2	DM
July 8 th , 2022	09:00 – 12:00		Meeting with audit team Closing meeting	DM, AK, NN, PC

2.4 Stakeholder Consultation Overview

The company provided its updated list of stakeholders, consisting of 87 stakeholders. 8 stakeholders were selected randomly, avoiding selecting those that had already been interviewed in the previous audit.

The communities chosen and visited were:

Manoel Silva- Community leader of Vila dos Palmares

- Josiel de Oliveira / Marinalva Gonçalves. Representative of Vila Vera Cruz - Assentamento Olho d'Água.
- Santo Antônio (Saí-açu) - Jorgeanne Barbosa dos Santos Ramos.
- Health center of Palmares / Jullyana S. Pitombeira (director)
- Carlos Santos / President of Rural Workers Union of Tailândia.

The 3 producers visited and interviewed were:

- Vitor Aparecido Ferreira
- Marlene Silva da Rosa
- Marta do Socorro Neves.

As part of the stakeholder activity and in order to better understand the situation of the invasion, one of the IBD auditors went with the social specialist hired by IBD to the area that was invaded, which is one of the ancestral cemeteries of the members of the neighboring communities (information from the team's conversations with members of the communities mentioned above). As reported in the social technical note issued on 8.07.2022 by the Anthropologist Gustavo Farra, during the visit the place was empty but there were traces of the recent presence of these people (see photos).



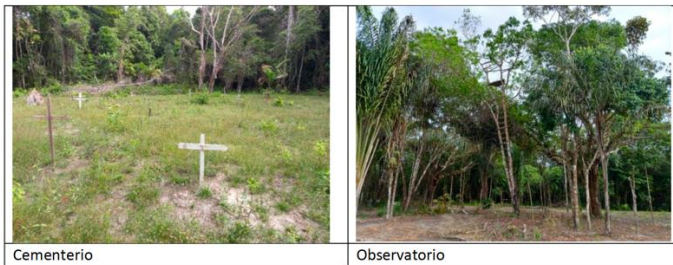
As part of Agropalma's social activities, it conducted a social study through the Peabirú Institute (an organization that specializes in agriculture and rural development).

Studies such as the above, carried out within the framework of the social sciences, help in the understanding of more complex issues involving ethnic identities, social customs and traditions, and even in the organization of different communities and social groups.

(See further details in the social technical note issued by Social Specialist Gustavo Farra 08.08.2022). The technical note is part of the documentary package of the audit in Agropalma from July 4 to 8, 2022.

As a conclusion of the verification process of the conflict between "Quilombolas" and Agropalma, the IBD auditor evidences that the legal process established by the authorities of the State of Pará is in process, and that at the time of the visit the legal resolution of the competent authority has been respected.

The interested parties who are aware of the conflict state that their desire is to reach an agreement, always within the framework of the law (Status invasion "Quilombolas" is part of the documentary package of the audit in Agropalma from 4 to 8.07 of 2022).



2.5 Stakeholders Consulted <i>(Stakeholder identities are confidential)</i>					
Stakeholder Type ⁴	# of Women	# of Men	Nationality	Role in community or job performed	Demographic
Workers	13	53	Brazil	Agropalma Worker	Tailândia, Acará, Tomé-Açú – PA
Indigenous People	0	0	-	-	-
Community members	3	3	Brazil	Representative of Vilas of Palmares and Vera cruz (surrounding communities)	Tailândia, Acará, Tomé-Açú – PA
Contractors	3	15	Brazil	Kitchen services, Administrative assistant, Maintenance, refrigeration, automotive helper, security and Detization and sanitization.	Tailândia – PA
Management and supervisor staff	2	12	Brazil	Management, supervisor of Agropalma	Tailândia – PA
National government	0	0	-	-	-
Local government	0	0	-	-	-

⁴ Some stakeholder types may not be applicable

Non-Governmental Organisations	0	0	-	-	-
Other	3	4	Brazil	Headquarters of the Arauaí Producers' Association and visit to the plantations of projects 2 and 3 and (Family farming).	Tailândia – PA

2.6 Selection of Sites (*Sampling methodology*)

Considering the demand of Agropalma’s estates needed to be sampled, was decided to visit 3 Agropalma Department (III, VI and XV) considering the activities that was been realized, the presence of presence of HCV and of rivers. For the smallholders was consider the history of audits, the size and location.

- In short, they were visited:

- own farms
- family producers
- 8 integrated producers

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
<p>1. Environmental Responsibility</p>		
<p>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).</p>		
<p>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 approach⁷ which combines biodiversity, carbon conservation and social considerations (including community needs) has been conducted.</p>	<p>Social and environmental impact studies of new plantations were carried out using a participatory methodology involving stakeholders. The company that carried out the study was OrbisExceller.</p> <p>Evidence:</p> <p>Summary of results:</p> <p>-The socio-environmental diagnosis was evaluated based on the environmental and socio-economic elements present in the project and in the region, such as: land use and occupation,</p>	<p>Conformance</p>

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.

vegetation, traditional communities, land tenure regularization, fragile soils, water resources, among others.

- Areas studied: 25 (4386.25 ha). Areas released: 1522.83 ha for new planting. Conservation/HCV-HCS - 1652.33ha.


- List of total areas. Example: Ana Maria Diniz- 22.90 ha.

- Regions involved in the study: Moju, Tomeacu and Thailand.

- General map of all areas studied - July/2019

Table 2.1 - Relação de áreas (ha)

Propriedade/ produtor	Área Total (ha)	Área de Produção atual de Palma (ha)	Área adequada aos novos desenvolvimentos (ha)
Vitor Aparecido	541,73	240,07	178,63
João Lima	768,31	348,14	238,9
Maria Socorro	609,60	93,13	38,63
Divino Heráldo	739,04	321,75	85,39
Cergio Elvira	158,45	-	146,43
Mikio Nagai	109,96	37,49	85,71
Francisco de Araújo	41,00	5,39	21,16
Ana Maria Diniz	22,90	6,89	4,93
Felisherto José	30,01	-	21,15
Raimundo Almeida	22,82	6,89	5,8
Saulo Feliciano MU A	32,73	-	15,2
Saulo Feliciano MU B	30,73	-	14,83
Saulo Feliciano MU C	100,63	-	54,99
Saulo Feliciano MU D	48,44	-	14,6
Saulo Feliciano MU E	48,47	-	11,47
Ramuel Ramos	41,75	11,72	10,33
Rosealva Almeida	132,98	-	19,67
Ivan Magalhães	29,28	-	11,00



Silvestre Borges	59,46	-	23,07
Antonio Cristo Paiva	82,07	-	40,39
Isa Valente	111,96	-	54,75
Francisco Ramos	99,43	-	27,65
Genivaldo Borges Área 1	72,54	-	19,58
Genivaldo Borges Área 2	26,36	-	14,24
Valdecy Pigatti	525,44	-	373,85
Total	4.386,25	1.071,06	1.522,83

A Figura 2.1 apresenta o mapa de localização geral das propriedades de novos desenvolvimentos.

1.1.2 HCS forest areas are identified and mapped.

No differences from last year were observed:

Conformance



	<p>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.</p> <p>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.</p> <p>It was 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.</p>	
<p>1.1.3 After March 2014 no new plantings take place in HCS forest areas identified for conservation.</p>	<p>The area preparation for new plantations does not cause deforestation in primary forests HCVs or HCSs after the dates established in the indicator.</p> <p>Studies of new plantations that include the LUCA analysis are carried out before the preparation of the area.</p> <p>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.</p>	<p>Conformance</p>
<p>1.1.4 Community participatory mapping has identified and mapped garden and</p>	<p>Agropalma’s and farmers’ s areas are private. There is no use of community areas for palm plantations.</p>	



<p>future farmlands⁸ that are fundamental to meeting their basic food needs over the license period of the plantation, and excluded them from being considered HCS forest.</p>		<p>Not Applicable</p>
<p>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).</p>	<p>Agropalma’s and farmers’ s areas are private. There is no use of community areas for palm plantations.</p>	<p>Not Applicable</p>
<p>1.1.6 A summary report of the HCS assessment including maps is made public.</p>	<p>No planting was carried out in areas characterized as HCS, nor did they contain native species.</p>	<p>Not Applicable</p>
<p>Recommendations:</p>		
<p>1.2 Peatland</p> <ul style="list-style-type: none"> • 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’. 		
<p>1.2.1 Undeveloped areas of peatland (of any depth) are not developed or drained.</p>	<p>Has no peat soil.</p>	<p>Not Applicable</p>

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

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



	There are no peat areas in the state of Pará, nor under Agropalma management.	
1.2.2 Fires and road-building on peat soils are prohibited.	<p>Has no peat soil.</p> <p>There are no peat areas in the state of Pará, nor under Agropalma management.</p>	Not Applicable
1.2.3 Where there is existing planting on peat, critical peatland ecosystems are identified and assessed for restoration opportunities.	<p>Has no peat soil.</p> <p>There are no peat areas in the state of Pará, nor under Agropalma management.</p>	Not Applicable
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’.	<p>Has no peat soil.</p> <p>There are no peat areas in the state of Pará, nor under Agropalma management.</p>	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	<p>Has no peat soil.</p> <p>There are no peat areas in the state of Pará, nor under Agropalma management.</p>	Not Applicable



(RSPO Criteria 4.4 and 7.4).		
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.	<p>Has no peat soil.</p> <p>There are no peat areas in the state of Pará, nor under Agropalma management.</p>	<p>Not Applicable</p>
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.	<p>Has no peat soil.</p> <p>There are no peat areas in the state of Pará, nor under Agropalma management.</p>	<p>Not Applicable</p>
Recommendations:		
<p>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).</p>		
1.3.1 All sources of GHG emissions, including those related to land use and non-land use activities, are identified and	As previously reported, pollutants and greenhouse gases are individually monitored at each extraction plant and these are	<p>Conformance</p>



<p>monitored using the RSPO PalmGHG methodology or equivalent.¹⁰</p>	<p>monitored using the PalmGHG calculator and which are later included in the company's Sustainability Report.</p> <p>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.</p> <p>At the plant, with a deadline of 2025 the installation to capture and burn the methane gas generated.</p> <p>http://www.agropalma.com.br/seguro-socioambiental/politica/gestao-de-gases-de-efeito-estufa</p> <p>The company monitors GHG emissions through the Palm GHG tool and discloses the data in its sustainability report.</p> <p>The plan to reduce or minimize emissions is available on the Agropalma website.</p> <p>Methane capture or elimination installation system installed in two extractive industries.</p> <p>The company monitors GHG emissions through the Palm GHG tool and publishes the data in its sustainability report.</p> <p>Evidence: Screenshot of the calculator summary (Example: CRAI/ AGROPAR).</p>	
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¹⁰ The latest version of the RSPO PalmGHG methodology must be used.



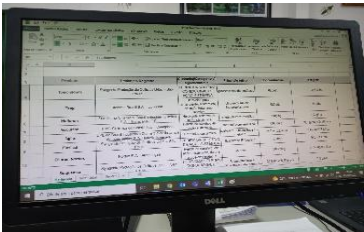
	<p>The screenshot shows a dashboard with a 'Summary Emission' table and a pie chart. The table lists products and their emissions:</p> <table border="1"> <thead> <tr> <th>Product</th> <th>CO2eq / tProduct</th> <th>Action</th> </tr> </thead> <tbody> <tr> <td>CPO</td> <td>-0.74</td> <td>OK</td> </tr> <tr> <td>PK</td> <td>-0.74</td> <td>OK</td> </tr> <tr> <td>POG</td> <td>-0.73</td> <td>OK</td> </tr> <tr> <td>PNE</td> <td>-0.73</td> <td>OK</td> </tr> </tbody> </table> <p>The pie chart shows four segments: 'Production/Process' (dark blue), 'Waste' (light blue), 'Transportation' (green), and 'Energy' (red).</p>	Product	CO2eq / tProduct	Action	CPO	-0.74	OK	PK	-0.74	OK	POG	-0.73	OK	PNE	-0.73	OK	
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<p>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.</p>	<p>The unit acts with preventive maintenance on equipment to improve burning efficiency, according to the sampled record Verified Service Order 139509 with a preventive maintenance request for equipment 02GE009085 Scania Generator Group - Industry, service order executed on 07/05/2022.</p> <p>The records are posted and controlled via spreadsheet Inspection Schedule in Generator Group and Pump Motors. Service Order 139509 with a preventive maintenance request for equipment 02GE009085 Scania Generator - Industry, work order done on 07/05/2022.</p> <p>The records are posted and controlled via spreadsheet Inspection Schedule in Generator Group and Pump Motors.</p> <p>We also checked the boiler maintenance schedule and sampled the maintenance service order, Service Order 31593, performed on 06/28/2022.</p> <p>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.</p>	<p>Conformance</p>															



	<p>The palm process is self-sufficient, it is not necessary to use electricity for industries.</p> <p>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.</p> <p>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.</p>	
<p>1.3.3 Annual GHG emissions from all sources and progress towards the targets documented in 1.3.2 are publicly reported.</p>	<p>The Agropalma Group discloses the balance of GHG emissions and sequestration on the company's website through its biannual Sustainability Report.</p> <p>https://www.agropalma.com.br/arquivos/relatorios/REL_SUST_A_GROPALMA_2019_PORTUGUES_FINAL_09FEV21-1613152603.pdf</p>	<p>Conformance</p>
<p>Recommendations:</p>		
<p>1.4 Pesticide use minimisation</p> <p>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.</p>		
<p>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</p>	<p>It was evidenced:</p> <ul style="list-style-type: none"> - NPE-GFIT-003 Revision 03 of 08/31/2020. Procedure that presents the integrated management plan for pests and diseases. 	<p>Conformance</p>



<p>'Highly Hazardous' list, c) SAN prohibited pesticide list and d) Paraquat.</p>	<ul style="list-style-type: none"> - The operational routine specifying all pests found in the region. RO-GFIT-014 - Phytosanitary Visit, revision 15. - The MIPD points out that applications must be carried out when the infestation level is greater than 5. <p>There is no use of prohibited pesticides. The only agrochemical used is glyphosate as a herbicide.</p> <p>The company does not use paraquat in its herbicide application processes. no paraquat has been used according to historical records of the company.</p>	
<p>1.4.2 The grower preferences natural weed and pest control and IPM.</p>	<p>The use of pesticides for pest and disease control is based on biological products and pheromone traps.</p> <p>Herbicide applications and spraying of biological insecticides are performed mechanically, there is no aerial spraying.</p> <p>Weed management is alternated between herbicide application in the line between planting and brushing and manual crowning plants.</p> <p>When done, herbicide preparation occurs in the field using the signaling and equipment necessary to avoid accidental spillage.</p> <p>Herbicide applications are not carried out in areas near watercourses.</p> <p>Was observed that the company are implementing alternatives of glyphosate consumption and considering use of mechanical practices od the herbs.</p>	<p>Conformance</p>

	<p>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 agents, establishes damage levels, and methods of control and field monitoring.</p> <p>It has a table identifying the main diseases and pests, category of damage, frequency of monitoring, level of damage, type of control and definition.</p> <p>Currently, the only type of pest control is the dispersion of shelters contaminated by entomopathogenic fungi (<i>B. Sophorae</i>) and endemic virus dispersion found in dead worms (<i>O. inviare</i>, <i>Talima</i> sp, <i>Acharia</i> s, and use of <i>Bacillus thuringiensis</i>). The other controls are mechanical and behavioral.</p> <p>Evidenced:</p> <p>Herbicide application report. Mechanized chemical control map. Identification of site, farm, plot, year, plants, density. Horometer: Density, initial, final, hours worked, product, hectares applied, total product used and total hectares applied</p> 	
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<p>1.4.3 Emergency use of listed pesticides is permitted subject to POIG Organising Committee approval.</p>	<p>According with MIP procedures, registers of pesticide use and during interviews was observed that no use of any pesticides listed by POIG was done.</p> <p>All pesticides used are described in RO-GIAG-002 - Defoliator Control, Revision 15-08/31/2020. Item 6.1.3</p> <table border="1" data-bbox="726 542 1507 1024"> <thead> <tr> <th>I.A *</th> <th>Produto</th> <th>I.A g/l</th> <th>Faixa</th> <th>DL50 oral em ratos</th> <th>DL50 dérmic em ratos</th> </tr> </thead> <tbody> <tr> <td>Glifosato Potássico</td> <td>TOUCHDOWN Xeque mate Crucial <u>Roundup</u></td> <td>620</td> <td>Pouco Tóxico</td> <td>> 2000 mg/kg</td> <td>> 2000 mg/kg</td> </tr> <tr> <td>Glifosato + S- Metolacoloro</td> <td><u>Sequence</u></td> <td>265,7 353,8</td> <td>Extremamente Tóxico</td> <td>> 5000 mg/kg de peso corpóreo</td> <td>> 5050 mg/kg de peso corpóreo</td> </tr> <tr> <td><u>Metsulfurom</u> <u>Metílico</u></td> <td><u>Accurate</u> Ally <u>Nufuron</u></td> <td>600</td> <td>Medianamente Tóxico</td> <td>> 2000 mg/kg</td> <td>> 4000 mg/kg</td> </tr> <tr> <td><u>Clethodim</u> + <u>Haloxifop-P</u>-<u>Metílico</u></td> <td><u>Aqile</u></td> <td>240 123,6</td> <td>Medianamente Tóxico</td> <td>> 2000 mg/kg de peso corpóreo.</td> <td>> 2000 mg/kg de peso corpóreo.</td> </tr> <tr> <td>DIUROM</td> <td><u>Diuron</u></td> <td>500</td> <td>Medianamente Tóxico</td> <td>> 300 e < 2000 mg/kg</td> <td>> 12000 mg/kg</td> </tr> </tbody> </table>	I.A *	Produto	I.A g/l	Faixa	DL50 oral em ratos	DL50 dérmic em ratos	Glifosato Potássico	TOUCHDOWN Xeque mate Crucial <u>Roundup</u>	620	Pouco Tóxico	> 2000 mg/kg	> 2000 mg/kg	Glifosato + S- Metolacoloro	<u>Sequence</u>	265,7 353,8	Extremamente Tóxico	> 5000 mg/kg de peso corpóreo	> 5050 mg/kg de peso corpóreo	<u>Metsulfurom</u> <u>Metílico</u>	<u>Accurate</u> Ally <u>Nufuron</u>	600	Medianamente Tóxico	> 2000 mg/kg	> 4000 mg/kg	<u>Clethodim</u> + <u>Haloxifop-P</u> - <u>Metílico</u>	<u>Aqile</u>	240 123,6	Medianamente Tóxico	> 2000 mg/kg de peso corpóreo.	> 2000 mg/kg de peso corpóreo.	DIUROM	<u>Diuron</u>	500	Medianamente Tóxico	> 300 e < 2000 mg/kg	> 12000 mg/kg	<p>Conformance</p>
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<p>Recommendations:</p>																																						

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.



<p>1.5.1 Use of chemical fertilisers is minimised through producers demonstrating preferential use of alternatives¹¹ to manage soil fertility.</p>	<p>In the plantations of the Agropalma Group, biomass (empty clusters, ashes, palm kernel cake, sludge) generated in the extraction industries is applied as fertilizer.</p> <p>The amount of chemical fertilizer applied is calculated considering the nutritional needs and results of soil analysis and plant foliar. Still "pueraria" is a legume that contributes to the fixation of nitrogen in the soil.</p> <p>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.</p> <p>Verified the adoption of an additional strategy using input for immobilization of aluminum to increase root depth and improve soil nutrient utilization;</p> <p>Evidence: 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</p>	<p>Conformance</p>
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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.



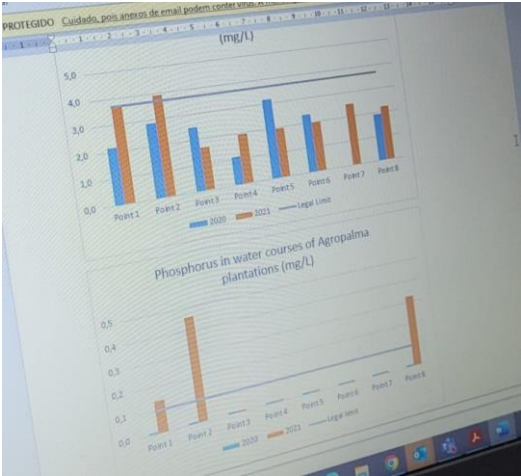
	<p style="text-align: center;">Composição Nutricional do CFV</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="text-align: left;">Nutriente</th> <th style="text-align: right;">g/kg</th> </tr> </thead> <tbody> <tr><td>N</td><td style="text-align: right;">9,9</td></tr> <tr><td>P</td><td style="text-align: right;">0,96</td></tr> <tr><td>K</td><td style="text-align: right;">20,89</td></tr> <tr><td>Ca</td><td style="text-align: right;">3,44</td></tr> <tr><td>Mg</td><td style="text-align: right;">1,30</td></tr> <tr><td>S</td><td style="text-align: right;">1,13</td></tr> <tr><td>B</td><td style="text-align: right;">8,2</td></tr> <tr><td>Cu</td><td style="text-align: right;">12,8</td></tr> <tr><td>Fe</td><td style="text-align: right;">733,6</td></tr> <tr><td>Mn</td><td style="text-align: right;">31,2</td></tr> <tr><td>Zn</td><td style="text-align: right;">25,2</td></tr> <tr><td>Na</td><td style="text-align: right;">131,6</td></tr> <tr><td>Al</td><td style="text-align: right;">383,1</td></tr> <tr><td>Co</td><td style="text-align: right;">< 0,3</td></tr> <tr><td>Mo</td><td style="text-align: right;">< 0,3</td></tr> <tr><td>Cl</td><td style="text-align: right;">7,17</td></tr> </tbody> </table>	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	
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Mo	< 0,3																																			
Cl	7,17																																			
<p>1.5.2 Phosphorus and nitrogen levels in relevant watercourses are monitored and 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.</p>	<p>Agropalma has a Water Resources Management Plan 'NPG 033, revision 02, 15/04/2021. Establish a procedure to guide all 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.</p> <p>Points on waterways are predetermined and sampled.</p> <p>An analysis is made at the points through an external laboratory. Evidenced in Test Report No. 2233.2022.A- C.O, sampling date 04/27/2022. Sampled evidence did not detect high rates. In the Agricultural area, there are recommendations so that the dosage does not exceed the pre-established limits, respecting the</p>	<p>Conformance</p>																																		



	<p>implemented procedures. According to the interview and evidence collected in the audit, the indicator principle is fulfilled.</p> <p>It was also evidenced:</p> <ul style="list-style-type: none"> - 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. 	
<p>1.5.3 Results of phosphorous and nitrogen monitoring in water courses are included in public reporting.</p>	<p>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.</p> <p>Evidence monitoring data from 2021.</p> <p>Analyzes performed by the Magma Analyses Laboratory.</p>	<p>Conformance</p>



	<p>Test Report No. 72622.2021. 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.</p> <p>Test Report No. 2626.2021. 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.</p> <p>Test Report No. 2627.2021. 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.</p> <p>Test Report No. 2628. 2021.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.</p> <p>Test Report No. 2629,2021. 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.</p> <p>Test Report No. 2623.2021. 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.</p> <p>Test Report No. 2624.2021. 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.</p> <p>Test Report No. 2625.2021. 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.</p>	
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<p>Recommendations:</p>		
<p>1.6 GMOs prohibition The cultivation of GMOs in the management area is prohibited.</p>		
<p>1.6.1 The use of GMOs in the management area is prohibited.</p>	<p>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/</p>	<p>Conformance</p>



	<p>Reporte de Embarque de Semilla Germinada</p> <p>Fecha: 11 de diciembre de 2020</p> <p>Destinatario: AGROPALMA S.A. BRASIL</p> <p>Código embarque: 125</p> <table border="1"> <thead> <tr> <th>Varietal</th> <th>Semillas</th> <th>Garantía</th> <th>Total Empacado</th> </tr> </thead> <tbody> <tr> <td>Spring</td> <td>70 000</td> <td>2 800</td> <td>72 800</td> </tr> <tr> <td>Total</td> <td>70 000</td> <td>2 800</td> <td>72 800</td> </tr> </tbody> </table> <p>Total de cajas: 18 Garantía: 4%</p> <p>CLASIFICACION DE EMBRIONES POR LONGITUD DE RADICULA</p> <p>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 utilizar los más pequeños.</p> <p>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.</p> <p>Factura N° 217-20</p> <p>Jefe de procesamiento de semillas Guillermo Brenes P. ASD COSTA RICA g.brenes@asd-cr.com 11 de diciembre de 2020</p> <p>CONTROL CALIDAD SEMILLAS ASD</p>	Varietal	Semillas	Garantía	Total Empacado	Spring	70 000	2 800	72 800	Total	70 000	2 800	72 800	
Varietal	Semillas	Garantía	Total Empacado											
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<p>Recommendations:</p>														
<p>1.7 Water accountability</p> <p>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.</p>														
<p>1.7.1 Water use, consumption and pollution by plantation operations and mills are monitored.</p>	<p>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 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.</p>	<p>Conformance</p>												



	<p>Every irrigated fertilized area is monitored for water bodies to check for contamination rates. Within the area, preserved water bodies were identified, contemplating what was required by the indicator. In an interview with Alexandre Rossi – Environment Coordinator, he was informed that water courses and wetlands are protected, as evidenced by the forest recovery project, in about 750 hectares of permanent preservation areas (Riparian forests) in the Moju region. /Thailand - PA, where it addresses the recovery of permanent preservation areas, natural regeneration. According to the interview and evidence collected in the audit, the indicator principle is fulfilled.</p> <p>It was also evidenced:</p> <ul style="list-style-type: none"> - 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. 	
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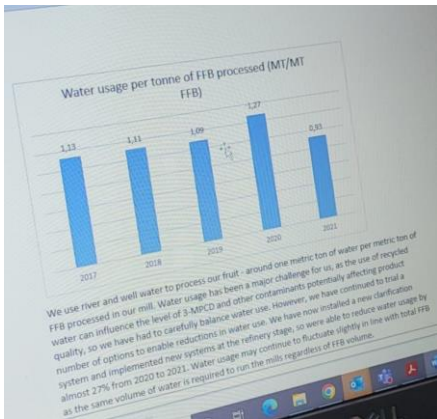


	<ul style="list-style-type: none"> - All water collected by the factory is recorded annually according to the procedure for use in the boilers and extraction process. This consumption is registered in the SIGIND system for each plant. Spreadsheet "03 - Water Consumption" was presented, where the total processed CFF, CPO and PKO produced and the total water consumed in the boiler and process is recorded. 	
<p>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</p>	<p>Verified that:</p> <ul style="list-style-type: none"> -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. - The water is controlled by analyzes that are performed weekly. It is also performed control and replacement of filter elements, as verified in the document Filter Element Change Schedule, changes are made every three months with the last record in the month 04/2022. 	<p>Conformance</p>

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.



	<p>- The water is taken to the supply points by truck and there is a supply schedule in two shifts, from 7am to 3:20pm and from 3:20pm to 11:20pm.</p> <p>Verified the last samples taken at the unit, randomly choosing one point from each of the 4 monitoring zones:</p> <p>Certificate 3719 - Imperial Shelter sink faucet - PV 03 Dep. VA, performed on 06/07/2022.</p> <p>Certificate 3755 - Drinking fountain Tucumã Lodge, held on 06/14/2022</p> <p>Certificate 3783 - Beebouro Alojamento Taperebá (Taperebá Bulk Waterer), held on June 21, 2022.</p> <p>Certificate 3810 - Drinking Fountain Restroom, held on 28/06/2022</p> <p>Certificate 3757 - Drinking Fountain Restroom, held on 14/06/2022</p> <p>Certificate 3756 - Piquiá Water Fountain, held on 14/06/2022</p>	
<p>1.7.3 Water use, consumption and pollution by plantations and mills are included in public reporting.</p>	<p>The company's website and the Agropalma Group's sustainability report include BOD levels and the amount of water used per ton of CFF.</p> <p>Extraction industries have an effluent treatment system.</p> <p>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.</p>	<p>Conformance</p>

	<p>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.</p> <p>The 2021 average water consumption per ton of processed fruit was 0.93 MT/MTFFB versus 1.27 MT/MTFFB in 2020.</p> 	
<p>1.7.4 A water stewardship assessment is undertaken involving relevant stakeholders to address water equity issues.¹³</p>	<p>In the context of the place where Agropalma carries out its activities, there is no conflict over water. The region is made up</p>	<p>Not Applicable</p>

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.



	<p>of several rivers and streams. The region's rainfall is around 2500 mm per year.</p> <p>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.</p> <p>In the municipalities where the Agropalma Group farms are located there is a low demographic density, approximately 10 inhabitants per KM2.</p>	
<p>Recommendations:</p>		
<p>1.8 Protect and conserve wildlife 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.</p>		
<p>1.8.1 Comprehensive biodiversity surveys to identify HCV 1-3 have been undertaken.</p>	<p>The company has HCV or HCV/HCS studies for all new plantations.</p> <p>Evidence:</p> <p>EISA:</p> <p>-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</p>	<p>Conformance</p>



	<p>deforestation, improvement in services and social infrastructure in the region, among others.</p> <ul style="list-style-type: none"> - 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. <p style="text-align: center;">Tabela 4.3 - Áreas (ha) de Altos Valores para Conservação na escala das Propriedades de Novos Desmembramentos</p> <table border="1" style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th>Propriedade</th> <th>Área Total de HCV</th> <th>HCV 1 e HCV 3</th> <th>HCV 4*</th> </tr> </thead> <tbody> <tr><td>Vitor Aparecido</td><td>114,14</td><td>107,01</td><td>7,13</td></tr> <tr><td>José Lito de Oliveira</td><td>189,37</td><td>177,66</td><td>11,71</td></tr> <tr><td>Marta Socorro</td><td>365,05</td><td>361,5</td><td>3,55</td></tr> <tr><td>Divino Heraldo</td><td>330,66</td><td>325,46</td><td>5,2</td></tr> <tr><td>Cergio Elkawa</td><td>11,93</td><td>11,04</td><td>0,89</td></tr> <tr><td>Milão Nagai</td><td>6,76</td><td>6,76</td><td>0</td></tr> <tr><td>Francisco de Araujo</td><td>14,46</td><td>14,46</td><td>0</td></tr> <tr><td>Ana Maria Diniz</td><td>8,15</td><td>8,15</td><td>0</td></tr> <tr><td>Felisberto José</td><td>6,75</td><td>6,75</td><td>0</td></tr> <tr><td>Raimundo Almeida</td><td>7,11</td><td>7,11</td><td>0</td></tr> <tr><td>Saulo Feliciano Lote A</td><td>21,5</td><td>21,5</td><td>0</td></tr> <tr><td>Saulo Feliciano Lote B</td><td>15,89</td><td>15,89</td><td>0</td></tr> <tr><td>Saulo Feliciano Lote C</td><td>29,56</td><td>26,85</td><td>2,71</td></tr> <tr><td>Saulo Feliciano Lote D</td><td>25,39</td><td>25,37</td><td>0,02</td></tr> <tr><td>Saulo Feliciano Lote E</td><td>33,34</td><td>33,3</td><td>0,04</td></tr> <tr><td>Manoel Ramos</td><td>12,94</td><td>12,94</td><td>0</td></tr> <tr><td>Benedita Almeida</td><td>79,89</td><td>77,41</td><td>2,48</td></tr> <tr><td>Ibson Magalhães</td><td>11,55</td><td>10,89</td><td>0,66</td></tr> <tr><td>Silvestre Borges</td><td>33,22</td><td>33,22</td><td>0</td></tr> <tr><td>Antonio Cristo Paiva</td><td>26,14</td><td>25,99</td><td>0,15</td></tr> <tr><td>José Valente</td><td>57,17</td><td>57,17</td><td>0</td></tr> <tr><td>Francisco Ramos</td><td>68,32</td><td>66,97</td><td>1,35</td></tr> <tr><td>Genivaldo Borges Área 1</td><td>52,96</td><td>52,96</td><td>0</td></tr> <tr><td>Genivaldo Borges Área 2</td><td>0,91</td><td>0,91</td><td>0</td></tr> <tr><td>Valdecy Pigatti</td><td>129,17</td><td>107,58</td><td>21,59</td></tr> <tr><td>Total</td><td>1.652,33</td><td>1.594,85</td><td>57,48</td></tr> </tbody> </table> <p style="font-size: small;">*Área de HCV 4 que não está incluída como HCV 1 e 3.</p>	Propriedade	Área Total de HCV	HCV 1 e HCV 3	HCV 4*	Vitor Aparecido	114,14	107,01	7,13	José Lito 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 Elkawa	11,93	11,04	0,89	Milão 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	Ibson 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	
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<p>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</p>	<p>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</p> <p>On the company's website there is a register of quantities of species from the Fauna Survey and Monitoring Program that contain endangered species.</p>	<p>Conformance</p>																																																																																																												



<p>outside the management area.¹⁴</p>	<p>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).</p> <p>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.</p> <p>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</p>	
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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.



	<p>represents approximately 2560 ha for each watchman dedicated exclusively to forest protection activities.</p> <p>This index surpasses surveillance even of the Iguazu National Park (one of the most structured in the country), the Iguazu 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.</p>	
<p>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.</p>	<p>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 Iguazu National Park (one of the most structured in the country), the Iguazu 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.</p> <p>To assist in the demarcation and protection of forest areas and in raising awareness among neighboring residents about the</p>	<p>Conformance</p>

prohibition of entry into the Agropalma Group's forest reserves, the borders are identified with warning signs (Figure 2).

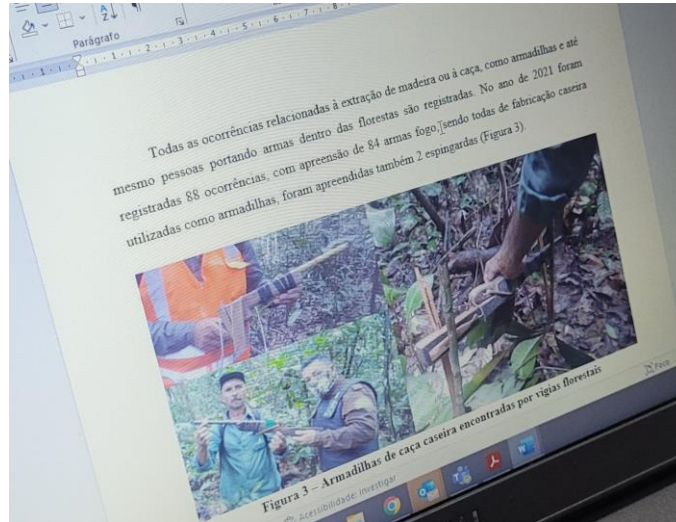


Figura 2 – Placa demarcando reserva florestal do Grupo Agropalma.

Recommendations:



<h2>2. Partnerships with Communities</h2>		
<h3>2.1 Free, Prior and Informed Consent</h3> <p>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').</p>		
<p>2.1.1 Resourced access to independent expert advice is offered at each stage of an FPIC or conflict resolution process to affected communities.</p>	<p>Agropalma and partner producers' areas are private and are not used in community areas.</p>	<p>Not Applicable</p>
<p>2.1.2 Processes of consultation and negotiation, in accordance with internationally recognised FPIC standards, are not constrained by local legal frameworks.</p>	<p>Agropalma and partner producers' areas are private and are not used in community areas.</p>	<p>Not Applicable</p>
<p>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</p>	<p>Agropalma and partner producers' areas are private and are not used in community areas.</p>	<p>Not Applicable</p>



established.		
2.1.4 Plantations have not been developed on land acquired through expropriations in the national interest (eminent domain) after March 2014.	<p>Agropalma does not develop plantations in areas acquired through expropriation.</p> <p>Randomly selected land titles and in some cases land lease contracts signed by both parties were evidenced.</p>	Not Applicable
Recommendations:		
<p>2.2 Food security</p> <p>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.</p>		
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 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.	<p>The Agropalma Group's farms are privately owned and do not fall within the territory of traditional communities.</p>	Not Applicable



<p>2.2.2 After March 2014, in new plantations or expansion of existing plantations, a minimum of 0.5 ha¹⁵ of garden or farmland per person is identified via participatory mapping, and enclaved for meeting food security needs.</p>	<p>Agropalma and partner producers' areas are private and are not used in community areas.</p>	<p>Not Applicable</p>
<p>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.</p>	<p>Agropalma and partner producers' areas are private and are not used in community areas.</p>	<p>Not Applicable</p>
<p>2.2.4 Evidence that measures identified in assessments and planning are being implemented and are effective.</p>	<p>Agropalma and partner producers' areas are private and are not used in community areas.</p>	<p>Not Applicable</p>
<p>Recommendations:</p>		
<p>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.</p>		
<p>2.3.1 The mutually agreed and documented system for dealing with complaints and grievances is accessible to all affected parties.</p>	<p>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</p>	<p>Conformance</p>

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.



	<p>communication channel is for receiving complaints, doubts, suggestions, compliments and others;</p> <ul style="list-style-type: none"> - Agropalma's website: there is a link to send your comments (complaints, doubts, suggestions, compliments): complaintcoesequeixas@Agropalma.com.br <p>In an interview with Cristiane Paiva de Lima (Coordinator of cooperative communication), it was informed that there are several types of communication:</p> <ul style="list-style-type: none"> - Internal announcements - An internal announcement is issued, eg use of masks in work areas, system availability, any emergency situation; - Corporate interaction - 1 time a month is issued (Information is disseminated by e-mail, bulletin boards and printed material for producers (rodrigo Rabi, José Geraldo - Agricultural Manager) - live well - Quarterly - Distributed in the community, health post, delivered to family farming areas. (Bigareli/Jorginho) - DDSMA (Daily Safety and Environment Dialogue) - Responsible for the topics addressed, including Alôagropalma - It was evidenced that all forms of communication is transmitted in the Portuguese language. <p>Hello Agropalma, extension 8213 and e-mail: aloagropalma@agropalma.com.br</p> <p>(No doubts/questions were detected by interested parties on issues related to information)</p>	
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	<p>Bulletin boards, through emails and through internal communications</p> <p>Verified that there is a procedure for complaints and grievances developed in conjunction with stakeholders. Complemented by the “Interested Party Demand” procedures that guarantee anonymity, if requested.</p> <p>This procedure for receiving, handling, responding, negotiating, deadline and resolving grievances and complaints was presented to the community and signed by them.</p> <p>Complaints procedure documented in "Procedure for Receiving, Handling, Responding, Negotiating and Settling Complaints and Complaints". This is updated every 2 years.</p> <p>Evidence:</p> <p>Communiqué signed by each of the persons who received the complaints procedure.</p> <p>>Representative of Palmares, Água Preta, Thailand, Vila Boa Esperança, among others.</p> <p>The signatures of 25 participants were evidenced, carried out in 2011;</p> <p>>Name: Carlos da Costa Santos Date delivered 07/30/2020. Renewal delivered to more than 70 people.</p>	
<p>2.3.2 The system provides a clear and known procedure with an indicative time</p>	<p>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</p>	<p>Conformance</p>



<p>frame for each stage.</p>	<p>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).</p> <p>Grupo Agropalma has a Complaints and Complaints procedure that establishes a period of up to 3 weeks for the response to be given to the interested party.</p>	
<p>2.3.3 The system keeps parties to a grievance informed of its progress.</p>	<p>Grupo Agropalma has a Complaints and Complaints Procedure and maintains a Stakeholder Registration Form that records the progress of complaints from entry to exit. Grupo Agropalma has a Complaints and Complaints Procedure and maintains a Stakeholder Registration Form that records the progress of complaints from entry to exit. In an interview with Cristiane Paiva (coordinator of cooperative communication), Complaints and complaints are usually made anonymously, and it is not possible to locate the complainant. When the identity of the complainant is informed, the collection of information is carried out in person or via telephone and informed of the status of the complaint.</p> <p>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.</p>	<p>Conformance</p>



	<p>1. ANEXO 1 – FORMULÁRIO DE REGISTRO DE DEMANDA DO ALO AGROPALMA</p> <p>Formulário de registro de demanda do ALO Agropalma</p> <p>AGROPALMA</p> <p>Nº: XX/20 Origem: <input type="checkbox"/> ALO Agropalma <input type="checkbox"/> Outros setores <input type="checkbox"/> Inverno <input type="checkbox"/> Verão</p> <p>Data de Comunicação: XX/XX/20 Entrada: XX/XX/20</p> <p>Nome do requerente: _____ Causador: _____</p> <p>Nome do solicitante: _____</p> <p>Endereço da solicitação: _____</p> <p>Vinculo: <input type="checkbox"/> Casa/Ofício <input type="checkbox"/> Fim <input type="checkbox"/> Trabalho <input type="checkbox"/> Visita <input type="checkbox"/> Outros: Brasil</p> <p>Assunto: <input type="checkbox"/> Reclamação <input type="checkbox"/> Questionamento <input type="checkbox"/> Sugerido <input type="checkbox"/> Cláusula <input type="checkbox"/> Outros</p> <p>Descrição de Assunto: _____</p> <p>Análise de Relevância: <input type="checkbox"/> Relevante* <input type="checkbox"/> Não Relevante Prazo para Resposta: XX/XX/20</p> <p>Eventualidades</p> <table border="1"> <thead> <tr> <th>Nº</th> <th>Data</th> <th>De</th> <th>Para</th> <th>Vinculo</th> </tr> </thead> <tbody> <tr><td> </td><td> </td><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td><td> </td><td> </td></tr> </tbody> </table> <p>Observações: _____</p> <p>Resposta</p> <p>Atendida: <input type="checkbox"/> Sim <input type="checkbox"/> Não Resposta: <input type="checkbox"/> Direta <input type="checkbox"/> Indireta</p> <p>Responsável: _____ Vínculo da resposta: _____</p> <p>Desencarregamento</p> <p>Solúveis: <input type="checkbox"/> Sim <input type="checkbox"/> Não Responsável: _____</p> <p>Data real de Desencarregamento: _____ Status da demanda: Enc. 00/00</p> <p><small>*Análise de Relevância: Sugere para priorizar o atendimento e resposta da Agropalma ao produtor ou não atendimento com a sociedade no âmbito das atividades produtivas e comerciais.</small></p>	Nº	Data	De	Para	Vinculo																										
Nº	Data	De	Para	Vinculo																												
<p>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.</p>	<p>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.</p> <p>In an interview with Cristiane Paiva and evidenced in the "communication document" where it is highlighted that at any stage of the complaint or complaint process, the interested party has the right to appeal, access or consult independent experts in legal or technical matters, (or any other). The claimant has the right to receive support from any representative of the local</p>	<p>Conformance</p>																														



	<p>communities of their own choosing (former president, association president, community leader, etc...)</p> <p>In an interview with Cristiane Paiva, he was informed that this type of event never happened.</p> <p>See 2.3.1 for evidence on socializing with stakeholders.</p>	
<p>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 parties.</p>	<p>In February 2022, Agropalma had a land invasion event in its planted areas by people from the surrounding communities, who call themselves Quilombolas claiming restitution of land tenure.</p> <p>Mr. Túlio Dias, presented the document "Agreements in the process" which describes the current status of each of the points of this event and the company's responses and actions.</p> <p>The previous event did not involve agreements through a process of consent, free, prior and informed (FPIC) or compensation processes. The local organization ITERPA (Instituto de Terras do Pará) is in charge of responding to this situation.</p> <p>During the audit, the property titles of these lands called Agropalma were randomly reviewed.</p>	<p>Conformance</p>
<p>2.3.6 Evidence that outcomes and remedies resulting from use of the mechanism are compatible with internationally recognised human rights.¹⁶</p>	<p>In February 2022, Agropalma had a land invasion event in its planted areas by people from the surrounding communities, who call themselves ""Quilombolas"" claiming restitution of land tenure.</p>	<p>Conformance</p>

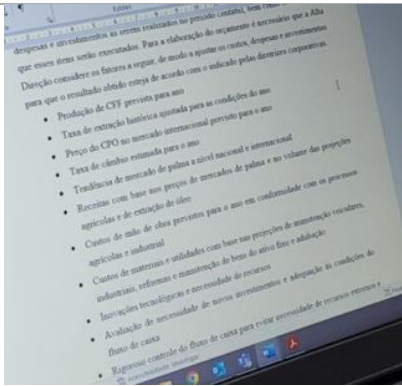
¹⁶ The [Universal Declaration of Human Rights](#), adopted by the UN General Assembly in December 1948, establishes internationally recognised human rights.



	<p>Mr. Túlio Dias, presented the document "Agreements in the process" which describes the current status of each of the points of this event and the company's responses and actions.</p> <p>The previous event did not involve agreements through a process of consent, free, prior and informed (FPIC) or compensation process</p>	
<p>Recommendations:</p>		
<p>2.4 Social conditions</p> <p>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.</p>		
<p>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.</p>	<p>Evidenced Social and Environmental Monitoring Management Plan; Studies and reports by Elabore, Peabiru, CI and the Social and Environmental Management and Monitoring Plan</p> <p>The company has a Social and Environmental Management and Monitoring Plan and is updated annually.</p> <p>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.</p> <p>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,</p>	<p>Conformance</p>



	<p>Installation of photovoltaic panels for energy generation, 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.</p> <p>Evidence: Screenshot of the executive report of the social monitoring management plan. Actions are reported to support producers, food aid to workers delivered since 2014 and enrollment in clinic for admission and admission exams in the cities of residence of the worker.</p> <p>The above information and others were verified in the interviews with the communities, the producers (see 2.4 stakeholder consultation) and in the field interviews of the departments sampled to visit, which were Departments 1A, VB and II.</p> <p>Men and women carrying out agricultural activities (39 workers) and 15 small family producers were interviewed.</p>	
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<p>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.</p>	<p>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.</p> <p>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.</p> <p>E.g.: truck driver, tractor operator and CFF cutting</p> <p>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.</p>	<p>Conformance</p>



	<p>On average, 110 people are responsible for maintaining the organization and cleanliness of the environment.</p> <p>Maintenance team is responsible for solving any problems related to the above items. The employee can contact the sector by telephone (91) 4009-8214 ext. 8214 and e-mail: centralos@agropalma.com.br</p> <p>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)</p>	
<p>Recommendations:</p>		
<p>2.5 worker’s rights</p>		
<p>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. (see 2.4.1)</p>		
<p>Terms and contracts of employment</p>		
<p>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.</p>	<p>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.</p> <p>Agropalma has the following types of contract:</p> <ul style="list-style-type: none"> - Contract determined - renewed only once. 	<p>Conformance</p>



	<ul style="list-style-type: none"> - Experience contract - after 90 days it becomes indeterminate. - Learning contract - Internship contract (according to the internship need) <p>Selection process is carried out by a specialized consultancy.</p> <p>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).</p> <p>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.</p> <p>Complementing, according to the document entitled People & Management Policy, code NPE-GRHU-003, revision 04 of 07/072021, item 4.6, every hiring must be formalized by a signed, written employment contract for a period of 90 days, which can be extended indefinitely, as also provided for in the legislation in force in the country.</p> <p>To prove the compliance with the requisite, a D.O.G. worker's work contract for the activity of agricultural support assistant, for a determined period of time, for cutting activities.</p>	
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Remuneration		Conformance
<p>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</p>	<p>Evidenced that a "Welfare Salary Study" was carried out in the agribusiness of Palma in April 2018. (Information compiled from salary study carried out externally in the region)</p> <p>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 national minimum wage.</p> <p>Having verified that the salary payment is made depending on the area and activity, with an established rate for each variable, to show that there are no differences in amounts paid for work of equal value, payment records for the months of June/2021 and June/2022 of male and female co-workers, in the same function, in different sectors, were sampled. All workers in the same function, have the same base salary.</p> <p>The following functions were sampled:</p> <p>General Services Auxiliary - Base salary RS1215.00 L.M and A.G employees.</p> <p>Production Operator C - Base Wage R\$1372.41, employees A.C and J.P.S.S</p> <p>Industrial tractor driver - Base salary 1476.80, employees E.C.C and E.A.L</p>	<p>Conformance</p>

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.



	<p>Agricultural Operator A - Base salary R\$ 1476,00, employees M.D.S and M.P.B.P</p> <p>Powerhouse Operator - Base salary R\$1245,83, employees L.S. and J.C.F</p> <p>Auxiliary Agricultural Support (chemical application) - Base salary R\$1215.00, employees J.C.M and J.C.P</p> <p>Frentista (Auxiliar de amoxarifado) Base salary R\$1602,17 - A.S.S. and R.L.B. employees.</p>	
<p>2.5.3 Wages are paid to all workers regularly, on time, directly to the worker and in legal tender or cheque.</p>	<p>Payment receipts were verified for some workers, which are always made before the last day of the work month or before the Friday of the last week of the month for agricultural workers. The other categories are always paid on the last working day of the month.</p> <p>All contracts, pay statements and other relevant documentation are in Portuguese so that employees can understand them.</p> <p>Payments are made by bank transfer.</p> <p>During interviews in the field and in operational areas, it was possible to confirm with workers that they are paid regularly and on time, that their salaries are deposited in a savings account in their name, and that they receive a payment slip detailing their salary and the relevant deductions.</p>	<p>Conformance</p>
<p>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.</p>	<p>The company does not work with advances and all discounts are foreseen in the contract or collective agreement.</p>	<p>Conformance</p>



	<p>Sampled contracts of different functions as mentioned in item 2.5.2.</p> <p>It was verified that all loans and salary discounts are legal, are registered, communicated and available to workers who request them and do not give rise to debt bondage (point 2.5.3 lists the usual salary discounts and describes that in the interviews it was possible to corroborate this information presented during the documentary review).</p>	
<p>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.</p>	<p>During interviews in the field and in the operational areas, it was possible to confirm with workers that their salaries are deposited in a savings account in their name and that they receive a pay slip detailing their salary and the corresponding deductions.</p> <p>The contracts of the following positions were sampled:</p> <p>General Services Auxiliary - Base salary R\$1215,00, employees L.M and A.G</p> <p>Production Operator C - Base salary R\$1372.41, employees A.C and J.P.S.S</p> <p>Industrial tractor driver - Base salary 1476.80, employees E.C.C and E.A.L</p> <p>The national minimum wage in 2022 is R\$1212.00 /month.</p> <p>According to the pay documents that were randomly reviewed, workers receive remuneration and benefits in accordance with applicable legislation, including health, pension, and social security.</p> <p>In the documentation provided for each employee, the following discounts were evidenced: FGTS, INSS, Health Insurance, etc.</p>	<p>Conformance</p>



Working hours and leave		
<p>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.</p>	<p>Checked the time record of the employees listed below, which does not exceed 44 hours per week as provided by law.</p> <p>Based on the available documents (contracts, payment statements, time records) compliance with national labor legislation was evidenced.</p> <p>Evidenced that the workload does not exceed 44 hours per week, with 1 hour of rest / lunch break.</p> <p>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.</p> <p>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.</p> <p>The months evaluated by the auditor were June 2021 and June 2022 and the payment slips reviewed were for various functions (more information in point 2.5.2).</p>	<p>Conformance</p>
<p>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</p>	<p>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.</p>	<p>Conformance</p>

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.



	<p>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.</p> <p>Verified the time sheets of employees of different functions, corresponding to the month of June 2022, the same evidenced compliance with the items addressed in this criterion (these time sheets are those listed in point 2.5.2).</p> <p>Example:</p> <p>Evidenced record of employee with the position of Agricultural Operator who took vacation from 05/01 to 05/31/2022 and was paid in accordance on 04/29/2022 the value of RS 2048.56 (gross value, discounted 1882.27, referring to the period worked from 09/16/2020 to 09/15/2022.</p> <p>During the interviews, we inquired about vacation leave and the compliance of workers with respect to compliance with correct and timely timing and payment, and there were no negative comments in this regard.</p>	
<p>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.</p>	<p>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.</p> <p>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.</p>	<p>Conformance</p>



	<p>Checked the collaborators' timesheets in a sample form, of different functions, for the month of June/2022, in which conformity with the items addressed in the criteria was evidenced.</p> <p>The months evaluated by the auditor were June 2021 and June 2022 and the payment slips reviewed were for various functions (more information in point 2.5.2).</p>	
Child labour		
<p>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</p>	<p>The company has a policy established in the employee conduct and ethics manual item 10 and the Corporate Social and Environmental Responsibility Policy.</p> <p>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.</p> <p>According to the Agropalma Group's Employee Disciplinary Manual, revised in October/2019, item 10 of the chapter presentation, the company commits to respect the Universal Declaration of Human Rights (UN, 1948) and the ILO, 1998, against child labor, and further defines in item 6.39 of the chapter restrictions, that it is forbidden to work with people under 18 years old inside the facilities, with the exception of Young Apprentices, as defined in law 10097/2000, which according to art. 402 defines a minor as an age between fourteen and eighteen years old.</p>	<p>Conformance</p>

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



	<p>Verified the spreadsheet extracted from the system, with the list of employees and their ages. Verified that the unit works with young apprentices and the lowest age listed is 16 years (for the industrial area of Limeira) and 18 years for the Agropalma units in Pará. The unit has 25 young apprentices aged 18.</p> <p>Verified the contract of the minor apprentice A.R.M.V born in 06/04/2003, 19 years old, that, according to CLT is within the age range of the Young Apprentice category, according to articles 428 and 433, the contract terms are in accordance with the laws 10097/2000 and CLT.</p>	
<p>2.5.10 Young workers legally permitted to work but subject to compulsory education laws only work outside school hours.</p>	<p>The company has 25 young 18-year-old apprentices. The contract of the minor A.R.M.V apprentice born on 06/04/2003 (19 years old), within the age bracket of the Young Apprentice category, according to articles 428 and 433 of the CLT, was verified.</p> <p>For current contracts, the practices will be supervised and directed with the purpose of learning, with drills and not actual work activities, in accordance with the curricular structure developed by SENAI, which establishes the holding of classes after the completion of each theoretical module.</p> <p>The young apprentices participate in these activities outside of school hours.</p>	<p>Conformance</p>
<p>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.</p>	<p>The practices of the young apprentices will be supervised and directed for learning purposes, with simulations and not work activities in the strict sense, according to the curricular structure elaborated by SENAI (National Industrial Learning Service), with a reduced workload and directed to the focus of learning.</p>	<p>Conformance</p>



	<p>In addition, all risks in the work environment are measured for each of the activities carried out and, based on this information, programs (PPRA and PCMSO) are developed to avoid exposure to risk by the worker. For dangerous activities, there are no young people in these activities, they only perform administrative functions.</p>	
<p>Forced or trafficked labour</p>		
<p>2.5.12 No fees or costs are charged to workers, directly or indirectly, for recruitment or employment services by recruitment agencies, private employment agencies or the employer. Where it is discovered that fees have been charged, workers are reimbursed the total amount paid.</p>	<p>The unit has a document entitled People & Management Policy, code NPE-GRHU-003, revision 04 of 07/072021, the policy is available in the system. 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.</p> <p>According to the recruitment checklist, there are no charges or fees paid for any purpose, for local or migrant workers.</p> <p>Evidenced that Agropalma uses third-party services only to recruit 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.</p>	<p>Conformance</p>



	<p>Interviewed workers who were asked about their hiring process reported according to what was evidenced in Agropalma's selection and hiring procedures and none of them stated that they charged fees and costs for hiring services.</p>	
<p>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.</p>	<p>The practice of document retention is prohibited by Brazilian law and Agropalma's internal policy.</p> <p>In documentary review and interviews with agricultural and administrative workers, there was no evidence of the retention of any type of documents such as passports, identification cards, certifications issued by any government or valuables.</p> <p>The company currently has no foreign employees.</p>	<p>Conformance</p>
<p>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.</p>	<p>In order to identify and take measures to mitigate or eliminate risks of the existence of forced labor, human trafficking and child labor in the supply base of fresh fruit bunches, the Grupo Agropalma has an exclusive department that, in addition to providing technical assistance, has monthly visits and through the execution of an annual schedule of internal audits that make the farms evaluate the suppliers in relation to labor conditions, including child labor and compulsory, and applies corrective and punitive measures in case of labor non-compliance.</p> <p>In the model contract for service providers, a specific inclusion was made on the prohibition of child labor, forced labor and human trafficking.</p> <p>Evidence:</p>	<p>Conformance</p>



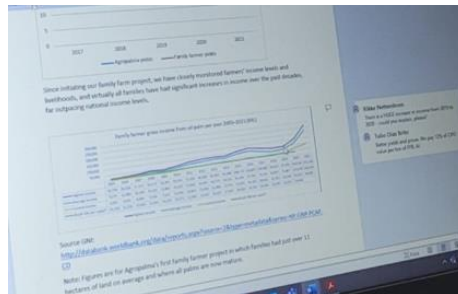
	<p>Sampled the implementation contract of the Palma Culture and Fruit Supply Exclusivity, nº 199/2022 of the company with VFS independent producer (family). Item 2.2 item g, h.</p>	
<p>Recommendations:</p>		
<p>2.5 Support to smallholders Contracts with smallholders are based on a fair, transparent and 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.</p>		
<p>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.</p>	<p>Through technical assistance reports and visit registration books (black book) carried out, all producers can present the impacts caused. Agropalma makes available monthly to each producer the prices charged for the purchase of the FFB, as provided for in the signed contract, and at each delivery the producer is informed of the total received and is informed of the amount to be received at the end of the month. Information on prices paid by FFB are available on the corporate website, freely accessible to any person or entity.</p> <p>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.</p>	<p>Conformance</p>

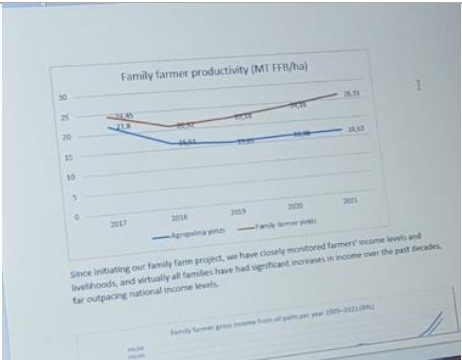


	<p>As previously reported, Grupo Agropalma has an exclusive department that provides technical assistance to family producers, guiding them on the best way to manage the crop in order to increase productivity performance.</p> <p>The company provided budgetary and financial guidance to family farmers. (Doc. Long-Term Economic and Financial Sustainability Plan)</p> <p>The income of family farming for the year 2021 was evidenced.</p> <p>Project 1 - Year of planting 2002, yield (T/HA/Year) 26.84, Productivity 298.51 T/year, Economic yield (R\$) 228,806.23.</p> <p>Project 2 - Year of planting 2004, yield (T/HA/YEAR) 25.54, Productivity 226.12 T/year, economic yield (R\$) 179,973.621</p> <p>Project 3 - Year of planting 2005, yield (T/HA/Year) 31.43, Productivity 285.52 T/Year. economic income (R\$) 223,411.71</p> <p>Project 4 - Year 2006, economic yield (T/HA/Year) 21.22, Productivity 125.94 T/Year, economic yield (R\$) 99,672.44</p> <p>Project 5 - Year of planting 2013, economic yield (T/HA/Year) 12.20, Productivity 95.40 T/Year. economic income (R\$) 74,797.70</p>	
<p>2.6.2 Progress in implementation of the smallholder support programme is included in public reporting.</p>	<p>The last published report is AGROPALMA: RELATORIO DE SUSTENTABILIDADE 2019 where is available for download at</p>	<p>Conformance</p>



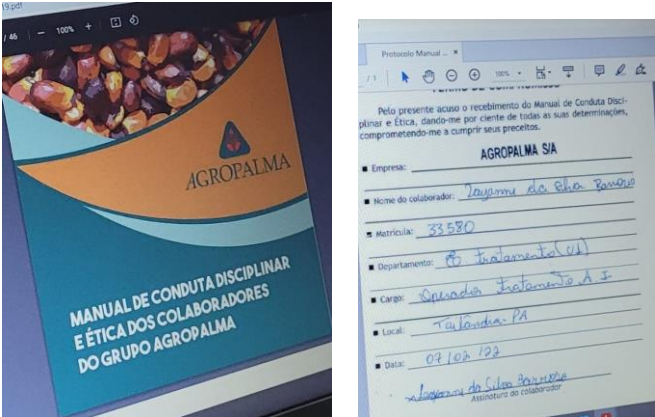
	<p>Agropalma website. At pages 24 and 26 are the information regarding support to smallholders can be consulted.</p> <p>https://www.agropalma.com.br/arquivos/relatorios/REL_SUST_AGROPALMA_2019_PORTUGUES_FINAL_09FEV21-1613152603.pdf</p> <p>It was evidenced that the company periodically reviews and publicly reports on the progress of the small producer support program.</p> <p>Work is currently underway to update the sustainability report, but it was presented to the auditor:</p> <p>Consolidated in graphs of follow-up with small producers:</p> <ul style="list-style-type: none"> - Family farming productivity (MT FFB / ha). - Comparison of gross income of family farming between 2005 and 2021. 	
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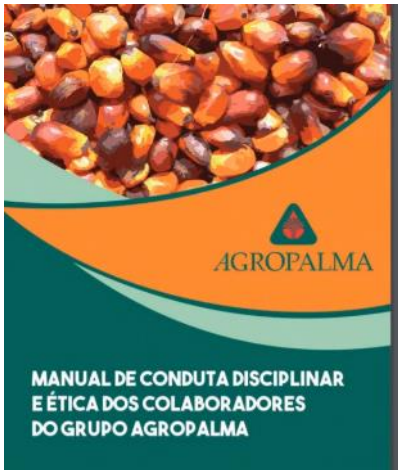


		
<p>2.6.3 Report on percentage of schemed smallholders, percentage of independent smallholders and percentage RSPO certified of each.</p>	<p>Evidenced during document analysis that Agropalma has a complete list of all CFF suppliers involved for RSPO certification, both family and integrated producers.</p> <p>The SAPINS system provides details of signed contracts, such as: contracted, contract duration, service provided, date the contract was signed, among others.</p> <p>Grupo Agropalma has a list with full name, location and amount of planted and productive area of partner producers and family farmers. Evidenced Production Document 2022 - 82% integrated producers, 18% family members.</p>	<p>Conformance</p>
<p>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</p>	<p>The Agropalma Group does not buy CFF from independent family producer groups.</p>	<p>Not applicable.</p>



<p>support the independent smallholders to achieve certification and progress towards POIG verification.</p>		
<p>Recommendations:</p>		
<p>3. Corporate and Product Integrity</p>		
<p>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.</p>		
<p>3.1.1 An ethical policy prohibiting all forms of corruption is publicly available.</p>	<p>The Agropalma Group fully complies with the Brazilian Anti-Corruption Law, Law No. 12846/2013.</p> <p>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.</p> <p>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..</p> <p>Every time an update or change is made to some legislation, new manuals are produced and made available to all employees.</p>	<p>Conformance</p>

	<p>Upon receipt, all employees sign the term of commitment, where they acknowledge the knowledge of what is described in the document.</p> 	
<p>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) Compliance with existing anti-corruption legislation.</p>	<p>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.</p> <p>In item 6.23 it is described that it is prohibited to receive or give gifts worth more than US\$ 30.00.</p> <p>Items: 6.23, 6.24 and 11 of the Conduct, Disciplinary and Ethics Manual of the Agropalma Group's employees.</p>	<p>Conformance</p>

	<p>In item 11, themes such as fraud and corruption are aborted.</p> 	
<p>Recommendations:</p>		
<p>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.</p>		
<p>3.2.1. Within 12 months of commitment to the Charter all mills under the management of the grower member have a traceability system in place to identify the location (at least GPS coordinates) of FFB production.</p>	<p>It was verified that:</p> <ul style="list-style-type: none"> - Agropalma has a management system called BioSalq, which manages the revenue of all FFB that enter the 6 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 	<p>Conformance</p>



	<p>procedures for carrying out the weighing activity of PM's and other products produced in the extraction plants.</p> <ul style="list-style-type: none"> - 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). T - he 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. <p>Grupo Agropal buys CFF directly from its suppliers (without intermediaries) and with all of them previously established a contract that contains the address of the production unit, so suppliers' ability is ensured.</p> <p>In addition, it has the Biosalc system that records all the information on FFB entries in the Group's extraction plants. Among this information are the name of the partner producer, year of planting and address of the property.</p> <p>Complementing, the values arriving from CFF are monitored and noted by the balance. These volume data are stored in the SIECA System, where information such as: Name, contract number, department to which it belongs, whether it is integrated or familiar, ticket number (unique, it serves for the operator to trace it) Monthly CFF, ton of cff and calculation of the gross value for the producer and invoice number. are available from all registered producers.</p>	
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	<p>Evidenced Producer Victor Aparecido Ferreira Hours data from CFF delivery since 2015. Evidenced that the company complies with this indicator.</p>	
<p>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.</p>	<p>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.</p> <p>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.</p> <p>Agropalma has long-term commercial contracts with everyone.</p> <p>Some farmers/family producers are organized in associations managed by a board, headed by a president.</p> <p>Agropalma only receives FFB from producers already registered in its supply base.</p>	<p>Conformance</p>
<p>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.</p>	<p>NPG55 – Política de Engajamento de Fornecedores de CFF ao RSPO e ao POIG.</p> <p>Agropalma has two types of CFF suppliers, as described below:</p> <ul style="list-style-type: none"> ☑ 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. 	<p>Conformance</p>



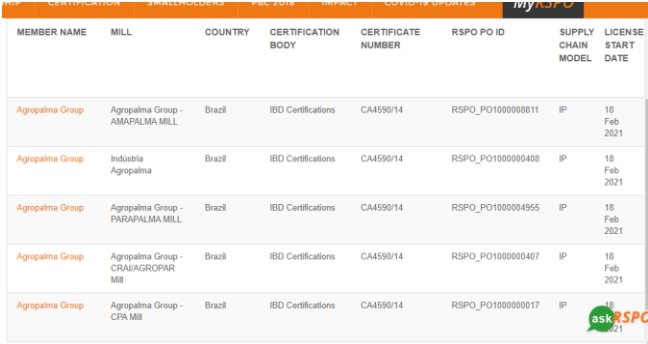
	<p>At least twice a month, an Agropalma representative visits each supplier to carry out their technical assistance work, verifying that they comply with the POIG indicators.</p> <p>Grupo Agropalma buys CFF only from known, identified and legal producers.</p> <p>Most of the CFF inputs come from 8 farms owned by Agropalma, 44 partner producers and 203 family producers.</p> <p>It is important to note that the above schedule is a theoretical forecast on which Agropalma will work to materialize.</p> <p>However, it is important to make clear that the processing of the RaCP depends on the RSPO and not on the Agropalma.</p> <p>Likewise the decision of independent producers to obtain RSPO certification Nor does it depend on Agropalma.</p>	
<p>Recommendations:</p>		
<p>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.</p>		
<p>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.</p>	<p>The Agropalma Group publishes a biannual Sustainability Report. They are available for consultation on the Agropalma website.</p> <p>https://www.agropalma.com.br/arquivos/relatorios/REL_SUST_AGROPALMA_2019_PORTUGUES_FINAL_09FEV21-1613152603.pdf</p>	<p>Conformance</p>



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<p>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).</p>	<p>Agropalma publishes sustainability reports in accordance with the guidelines of the Global Reporting Initiative - GRI.</p> <p>https://www.agropalma.com.br/arquivos/relatorios/REL_SUST_AGROPALMA_2019_PORTUGUES_FINAL_09FEV21-1613152603.pdf</p> <p>Pg36-39</p>	<p>Conformance</p>																																																
<p>Recommendations:</p>																																																		
<p>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.</p>																																																		
<p>3.4.1 A minimum of 50% of the company’s plantations and mills are RSPO certified upon commitment to this Charter²⁰.</p>	<p>100 % of Agropalma s plantations and mills are RSPO certified.</p>  <table border="1"> <thead> <tr> <th>MEMBER NAME</th> <th>MILL</th> <th>COUNTRY</th> <th>CERTIFICATION BODY</th> <th>CERTIFICATE NUMBER</th> <th>RSPO PO ID</th> <th>SUPPLY CHAIN MODEL</th> <th>LICENSE START DATE</th> </tr> </thead> <tbody> <tr> <td>Agropalma Group</td> <td>Agropalma Group - AMAPALMA MILL</td> <td>Brazil</td> <td>IBD Certifications</td> <td>CA4590/14</td> <td>RSPO_PO1000000011</td> <td>IP</td> <td>18 Feb 2021</td> </tr> <tr> <td>Agropalma Group</td> <td>Industria Agropalma</td> <td>Brazil</td> <td>IBD Certifications</td> <td>CA4590/14</td> <td>RSPO_PO10000000408</td> <td>IP</td> <td>18 Feb 2021</td> </tr> <tr> <td>Agropalma Group</td> <td>Agropalma Group - PARAPALMA MILL</td> <td>Brazil</td> <td>IBD Certifications</td> <td>CA4590/14</td> <td>RSPO_PO10000004955</td> <td>IP</td> <td>18 Feb 2021</td> </tr> <tr> <td>Agropalma Group</td> <td>Agropalma Group - CROMAGROPAR Mill</td> <td>Brazil</td> <td>IBD Certifications</td> <td>CA4590/14</td> <td>RSPO_PO10000000407</td> <td>IP</td> <td>18 Feb 2021</td> </tr> <tr> <td>Agropalma Group</td> <td>Agropalma Group - CPA Mill</td> <td>Brazil</td> <td>IBD Certifications</td> <td>CA4590/14</td> <td>RSPO_PO10000000017</td> <td>IP</td> <td>18 Feb 2021</td> </tr> </tbody> </table>	MEMBER NAME	MILL	COUNTRY	CERTIFICATION BODY	CERTIFICATE NUMBER	RSPO PO ID	SUPPLY CHAIN MODEL	LICENSE START DATE	Agropalma Group	Agropalma Group - AMAPALMA MILL	Brazil	IBD Certifications	CA4590/14	RSPO_PO1000000011	IP	18 Feb 2021	Agropalma Group	Industria Agropalma	Brazil	IBD Certifications	CA4590/14	RSPO_PO10000000408	IP	18 Feb 2021	Agropalma Group	Agropalma Group - PARAPALMA MILL	Brazil	IBD Certifications	CA4590/14	RSPO_PO10000004955	IP	18 Feb 2021	Agropalma Group	Agropalma Group - CROMAGROPAR Mill	Brazil	IBD Certifications	CA4590/14	RSPO_PO10000000407	IP	18 Feb 2021	Agropalma Group	Agropalma Group - CPA Mill	Brazil	IBD Certifications	CA4590/14	RSPO_PO10000000017	IP	18 Feb 2021	<p>Conformance</p>
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²⁰ The POIG Secretariat will assess compliance as part of the Due Diligence entry requirements.



<p>3.4.2 Within 24 months of POIG membership, 100% RSPO certification of the company’s plantations and mills is achieved.²¹</p>	<p>100 % of Agropalma s plantations and mills are RSPO certified.</p>  <table border="1"> <thead> <tr> <th>MEMBER NAME</th> <th>MILL</th> <th>COUNTRY</th> <th>CERTIFICATION BODY</th> <th>CERTIFICATE NUMBER</th> <th>RSPO PO ID</th> <th>SUPPLY CHAIN MODEL</th> <th>LICENSE START DATE</th> </tr> </thead> <tbody> <tr> <td>Agropalma Group</td> <td>Agropalma Group - AMAPALMA MILL</td> <td>Brazil</td> <td>IBD Certifications</td> <td>CA4590/14</td> <td>RSPO_PO1000000811</td> <td>IP</td> <td>18 Feb 2021</td> </tr> <tr> <td>Agropalma Group</td> <td>Indiatia Agropalma</td> <td>Brazil</td> <td>IBD Certifications</td> <td>CA4590/14</td> <td>RSPO_PO1000000408</td> <td>IP</td> <td>18 Feb 2021</td> </tr> <tr> <td>Agropalma Group</td> <td>Agropalma Group - PARAPALMA MILL</td> <td>Brazil</td> <td>IBD Certifications</td> <td>CA4590/14</td> <td>RSPO_PO10000004955</td> <td>IP</td> <td>18 Feb 2021</td> </tr> <tr> <td>Agropalma Group</td> <td>Agropalma Group - CRAIAGROPALMA Mill</td> <td>Brazil</td> <td>IBD Certifications</td> <td>CA4590/14</td> <td>RSPO_PO10000000407</td> <td>IP</td> <td>18 Feb 2021</td> </tr> <tr> <td>Agropalma Group</td> <td>Agropalma Group - CPA Mill</td> <td>Brazil</td> <td>IBD Certifications</td> <td>CA4590/14</td> <td>RSPO_PO10000000017</td> <td>IP</td> <td>18 Feb 2021</td> </tr> </tbody> </table>	MEMBER NAME	MILL	COUNTRY	CERTIFICATION BODY	CERTIFICATE NUMBER	RSPO PO ID	SUPPLY CHAIN MODEL	LICENSE START DATE	Agropalma Group	Agropalma Group - AMAPALMA MILL	Brazil	IBD Certifications	CA4590/14	RSPO_PO1000000811	IP	18 Feb 2021	Agropalma Group	Indiatia Agropalma	Brazil	IBD Certifications	CA4590/14	RSPO_PO1000000408	IP	18 Feb 2021	Agropalma Group	Agropalma Group - PARAPALMA MILL	Brazil	IBD Certifications	CA4590/14	RSPO_PO10000004955	IP	18 Feb 2021	Agropalma Group	Agropalma Group - CRAIAGROPALMA Mill	Brazil	IBD Certifications	CA4590/14	RSPO_PO10000000407	IP	18 Feb 2021	Agropalma Group	Agropalma Group - CPA Mill	Brazil	IBD Certifications	CA4590/14	RSPO_PO10000000017	IP	18 Feb 2021	<p>Conformance</p>
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<p>3.4.3 Newly acquired plantations are RSPO certified within 24 months of acquisition.</p>	<p>There are no newly acquired plantations at Agropalma.</p>	<p>Conformance</p>																																																
<p>3.4.4 A policy for purchasing 100% RSPO certified FFB within 24 months of signing the POIG Charter is developed, implemented and monitored for progress. Acceptable alternatives may be defined for independent smallholders.</p>	<p>Presented FFB Supplier Engagement Policy for RSPO and POIG (NPG-55, 07/13/17) that contains:</p> <ul style="list-style-type: none"> - 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. 	<p>Conformance</p>																																																

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



<p>Recommendations:</p>		
<p>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.</p>		
<p>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</p>	<p>This audit is number 6, which evaluates Agropalma's compliance with the POIG indicators. The previous audit was conducted on September 6, 2021 (10 months before the current audit).</p>	<p>Conformance</p>
<p>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.</p>	<p>Agropalma s POIG audit are made jointly with the RSPO audit that are performed on an annual basis.</p>	<p>Conformance</p>
<p>3.5.3 Audit reports are made publicly available on the POIG website.²³</p>	<p>Last Agropalma POIG audit was published at the POIG website.</p>	<p>Conformance</p>
<p>Recommendations:</p>		

²² The POIG Secretariat will monitor compliance with this indicator.

²³ The POIG Secretariat will monitor compliance with this indicator.