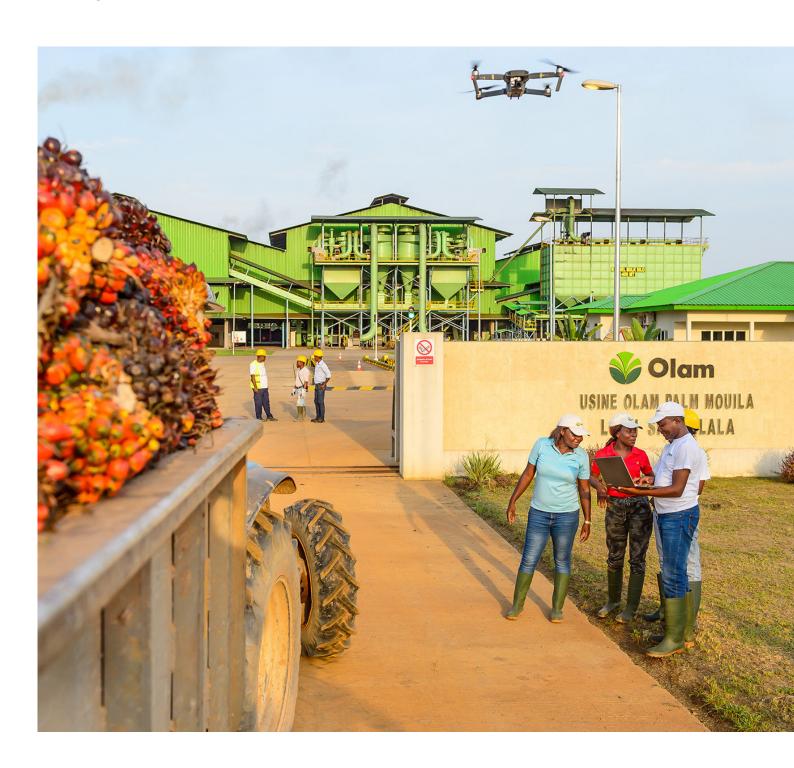


Olam Palm Gabon Policy 2021

Olam International Limited





1 Introduction

Olam Palm Gabon is committed to sustainable palm oil production and sourcing, and fully supports the RSPO standard, protection of high conservation value forests and ecosystems, high carbon stock forests, peatland, and improving the livelihood of rural communities. We are committed to supporting the principle of "No HCS, No HCV, No Peat and No Exploitation".

This Sustainable Palm Oil Policy is in line with, and supports, principles set out in other Olam policies¹.

9 Scope

Olam Palm Gabon (OPG) is the largest RSPO certified producer in Africa, managing palm oil mills with integrated kernel crushing plant (KCP) facilities and five concessions which are 100% Roundtable on Sustainable Palm Oil (RSPO) certified. These certified mills and KCP source fresh fruit bunches from its own plantations and are fully traceable to farm origin.

OPG also supports a scheme-smallholders program, namely Sotrader Ndende. All plantations fully comply with the RSPO New Planting Procedures which include FPIC and public stakeholders' consultation as well as HCV assessment (and HCS assessment after 2015 if relevant).

Since January 2017, we have upheld a moratorium on any further greenfield palm development or expansion. OPG has no plans for further expansion of palm production at this time.

¹ https://www.olamgroup.com/sustainability.html



3.1

Commitment to a net-positive impact through sustainable palm plantations

- Make a net-positive contribution to local livelihoods and communities, biodiversity conservation, and climate by adopting a landscape approach to management in our own plantations.
- Effectively implement the RSPO
 Standard in OPG-owned operations and to all subsidiary companies, joint ventures and areas in which we have management control.
- Actively participate in the RSPO and relevant national Interpretation to support its global objectives.
- Build local and national capacity to implement RSPO practices.
- Support the jurisdictional certification approach and development of a responsible land use plan and sustainability frameworks in origin.

3.2 Commitment to eliminate unacceptable practices

(No HCV, No HCS and No Peat)²

- No deforestation of primary forests and protected areas.
- No deforestation of high conservation value (HCV) forests and ecosystems³.
- No deforestation of high carbon stock (HCS) forests⁴.
- No development on peatland regardless of depth.
- Zero burning including no use of fire during land preparation, planting or replanting.
- Control illegal logging, hunting of protected species, and illegal hunting in all our concession area.

² Apply RSPO Remediation and Compensation Procedure where there has been land clearing without prior HCV assessment since November 2005, or without prior HCV-HCSA assessment since November 2018. This include restoration of all non-compliant deforestation/conversion as required by the RSPO.

³ We will follow the definitions and guidance of the global multi-stakeholder platform of expertise on HCVs, the HCV Network, www.hcvnetwork.org as applicable, achieve quality HCV assessment by only engaging with the licensed High Conservation Value (HCV) assessors accredited by the HCV Resource Network's Assessor Licensing Scheme (ALS).

We will follow the definitions and guidance of the global multi-stakeholder platform of expertise on HCS, the High Carbon Stock Approach (HCSA), http://highcarbonstock.org or those of an RSPO-endorsed HCS methodology, as applicable.



3.3

Commitment to positive environmental impacts and healthy ecosystems

- Manage HCV, HCS areas and unplanted land to maintain and enhance biodiversity, including populations of rare and threatened species.
- Manage OPG's palm operation to achieve carbon neutrality and net drawdown of carbon, in order to supply customers with climate-positive palm oil products.
- Maintain a functioning ecological network including healthy river and riparian, wetland, forest, and savannah to ensure ecosystem services are maintained or enhanced within our palm estates.
- Partner with environmental and climate scientists and conservation NGOs to deepen the understanding of species conservation and ecosystem recovery in our new generation plantations.
- Engage with local communities and stakeholders to develop sustainable alternatives to hunting, logging and promote community-based natural resource management.

- Implement best management practices for soils with an integrated nutrient recycling strategy and optimal use of inorganic fertilizer.
- Prohibit use of paraquat, and other pesticides categorised as WHO class 1A or 1B, or that are listed by the Stockholm or Rotterdam Conventions unless in exceptional pest outbreak situation.
- Ensure mill effluent is treated in compliance with national regulation and monitor biochemical oxygen demand (BOD) and chemical oxygen demand (COD) regularly.
- Achieve water intensity use per tonne of FFB as per the industry best standard.



3.4

Commitment to respect rights of all workers⁵ and communities

- Respect and uphold the rights of all workers, including contract, temporary, and migrant workers, in accordance with the conventions of the International Labor Organization (ILO) and United Nations Global Compact's (UNGC) guiding principles on human rights and labour.
- Promote responsible labour practices according to the principles outlined in the RSPO and Free and Fair Labor Guidance.
- Enforce strict rules to prevent and protect against child labour and forced labour as defined by ILO standards and national laws.
- Provide a healthy and safe workplace for our employees, contractors and visitors.
- Respect the right to freedom of association and recognise the right to collective bargaining of our workers in accordance with Conventions 87 and 98 of the International Labour Organisation.

- Provide equal opportunities of employment without regard to the employee's race, colour, religion, sex, age, national origin, sexual orientation, disability, citizenship status, marital status, etc.
- Enforce RSPO requirements for worker's rights, including access to a transparent grievance procedure.
- Engage transparently to ensure Free, Prior and Informed Consent (FPIC) of local communities and stakeholders.
- Respect legal and customary land tenure rights with reference to the UN Declaration on the Rights of Indigenous Peoples.
- Implement mutually agreed dispute settlement resolution for any dispute and ensure access to a transparent grievance procedure.
- Prohibit retaliation against human rights defenders.

⁵ Refers to the Olam's Fair Employment Policy



3.5 Commitment to support a thriving rural community

- Support schemed smallholders to build capacity, improve yields and apply good practices.
- Contribute to community development by improving healthcare, water accessibility, and education facilities.
- Catalyse local enterprises and encourage income generating activities at village level.
- Support cultural development in local communities including contributing to raised awareness and celebration of natural and cultural heritage and local history.⁶
- Promote equality of work and equal access to training and opportunities for women in the workforce.
- Enhance resilience of the local community by supporting activities to strengthen food security and prevent epidemic disease.

3.6 Commitment to ethical business conduct and transparency

- Zero-tolerance to bribery and corruption.⁷
- Submit annual RSPO progress report.
- Transparent progress report through a quarterly dashboard update.
- Maintain a transparent grievance procedure and progress update.
- Continuous engagement with national and international stakeholders.

3.7 Governance

Olam Corporate Responsibility and Sustainability (CR&S) Function oversees the progress against these commitments. The Board CR&S Committee monitors Olam's performance. We set out our principles in our Code of Corporate Governance and Code of Conduct⁸. If any employee discovers any unethical practice, the Code of Conduct explains that they must report it without fear of reprisals.

Please refer to our latest palm annual progress update on roadmap and performance.

 $^{^{6} \ \}text{https://www.olamgroup.com/news/all-news/news-bites/conserving-gabon-cultural-heritage.html} \\$

⁷ https://www.olamgroup.com/content/dam/olamgroup/about-ol am/ethics-and-compliance/ethics-and-compliance-pdfs/Olam-Anti-Bribery-and-Corruption-Policy-Aug2020.pdf

⁸ https://www.olamgroup.com/sustainability/policies-codes-standards.html